

Greenshaw Learning Trust **Procurement Policy**

GLT Procurement Policy

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PART A

1.1. Application

This GLT Procurement Policy applies to the Greenshaw Learning Trust as a whole and to all the schools in the Trust and the Trust Shared Service, in accordance with and pursuant to the Finance Policy of the Greenshaw Learning Trust.

The Greenshaw Learning Trust, including all the schools, their Trustees, governors and staff, must abide by this GLT Procurement Policy.

This Policy is subject to the Trust's Scheme of Delegation for Governance Functions. If there is any ambiguity or conflict then the Scheme of Delegation and any specific alteration or restriction to the Scheme approved by the Board of Trustees takes precedence.

In implementing this policy and associated policies and procedures the governing body, Headteacher and school staff, and Trust Shared Service staff, must take account of any advice or instruction given to them by the GLT Head of Procurement, the Director of Finance, the GLT CEO or Board of Trustees.

If there is any question or doubt about the interpretation or implementation of this Policy, the Director of Finance should be consulted.

1.2. Approval and review

Maintenance of this Policy is the responsibility of the GLT Head of Procurement.

This Policy was approved by the Board of Trustees on: 17 October 2025

This Policy is due for review by: July 2028

1.3. Terminology

The Trust means the Greenshaw Learning Trust (GLT).

- School means a school within the Greenshaw Learning Trust.
- Headteacher means the headteacher or principal of the school.
- Head of Service means the service lead within the Trust Shared Service
- CEO means the Chief Executive Officer of the Greenshaw Learning Trust.
- Governors and Trustees includes governors, Trustees, non-governor members of Trust Committees and members of the Trust Panel.
- Governing body (GB) means the committee of the Board of Trustees to which Trustees have delegated appropriate powers and functions relating to the governance of the school.

- UK Procurement Laws - means the Procurement Act 2023 or Procurement Contract Regulations 2015.

References in this Policy to a school in the Trust should also be read as the Trust Shared Service for services, functions and staff of the Trust that are not contained within a school budget and/or are not the responsibility of a Headteacher and/or Governing Body. With respect to the Trust Shared Service, references in this Policy to the responsibilities of the Headteacher and Governing Body should be read as the GLT CEO and the Finance and Operations Performance Committee respectively.

1.4. Responsibilities

This Policy is the responsibility of the GLT Head of Procurement. It is the responsibility of the Headteacher of each school, and the Board of Trustees and GLT CEO for the Trust Shared Service, to ensure that their school/service and its staff adhere to this GLT Procurement Policy; in implementing this Policy the Headteacher and Trust staff must take account of any advice given to them by the GLT Head of Procurement, Director of Finance, the GLT CEO and/or Board of Trustees.

When procuring on behalf of Trust schools the GLT Head of Procurement is acting as an 'Agent' in creating binding terms and conditions for the Trust. Wherever a school undertakes any procurement independently then the Headteacher will be acting as an agent of the Trust and should ensure procurement is compliant with the Finance Policy, Schedule of Financial Delegation and the Procurement Policy and procedures and guides.

The GLT Head of Procurement is referred to throughout this document. However, procurement or purchasing may be undertaken by Trust and school staff only in accordance with the Finance Policy, Schedule of Financial Delegation and procurement thresholds referred to in this policy.

1.5. Associated policies and procedures

This Policy is a constituent part of the GLT Finance Policy.

The following Trust policies and procedures are directly related to and complement this GLT Procurement Policy:

- GLT Staff and Volunteer Code of Conduct.

PART B

1. Context

- 1.1. The Greenshaw Learning Trust is committed to ensure that any spend of Public money, regardless of value, is carried out in a transparent and non-discriminatory way and in compliance with the UK UK Procurement Laws and the Bribery Act 2010.
- 1.2. As a publicly funded organisation, the Greenshaw Learning Trust acts as a 'Contracting Authority'.
- 1.3. There is a duty on all members of staff who may be involved in any stage of the procurement process to apply the key principles of best practice procurement to achieve appropriate governance, value for money and suitable quality of goods and services to meet operational needs.
- 1.4. The GLT Finance Policy and Schedule of Financial Delegation outline who has authority to award contracts and/or raise orders. Failure to comply with either this GLT Procurement policy, the GLT Finance Policy or the relevant Schedule of Financial Delegation may result in withdrawal of authority and disciplinary action.
- 1.5. This policy sets out how the Greenshaw Learning Trust manages procurement to ensure compliance with relevant legislation. Detailed guidance on how to procure is covered in a range of procurement procedure guides and training are available on the Finance & Procurement Intranet pages which must be followed by all members of staff. Failure to comply with this policy and/or follow the procurement procedure guides could result in disciplinary action.

2. Compliance with the Modern Slavery Act 2015

- 2.1. The Greenshaw Learning Trust is required to follow the requirements of the Modern Slavery Act 2015 and, in doing so, has prepared a statement which is published on the GLT website. All suppliers are required to fully follow the Modern Slavery Act 2015 and will be required to confirm that they do so by accepting the Terms and Conditions. The Greenshaw Learning Trust reserves the right to exclude any bidder who has been convicted of an offence under section 1, 2 or 4 of the Act and reserves the right to terminate contracts where bidders are found to have breached the legislation after contract award.
- 2.2. Where the GLT Head of Procurement has identified that a procurement exercise is particularly high risk then they may require bidders to provide clarification of supply chains and ensure that suppliers demonstrate their methods of corporate social responsibility during the tendering and selection process, details of which may vary according to the project.

3. General Principles

- 3.1. The Procurement Shared Service Team will work with Headteachers by providing professional support in obtaining works, goods and/or services which are best suited to any application in a manner which is compliant with current Procurement Law and best practice. Alternatively, where

schools are making independent purchases the Procurement Shared Service Team will provide procurement guides which members of staff must follow.

- 3.2. When purchasing and contracting for goods and services, Headteachers must demonstrate compliance with Procurement Law and the proper and effective use of public funds at all times. Purchasing procedures ensure that the goods, services and works procured are for the correct quantity and quality, arrive on time and achieve best value. The following general principles must therefore be adhered to:

- 3.2.1. **Transparency and Non-Discrimination** - In all purchasing activity the responsible member of staff must ensure that all contractors, suppliers and service providers are treated equally and without discrimination and must act in a transparent and proportionate manner. Procurement procedures must not be undertaken in a manner which artificially narrows competition, favours or disadvantages any contractor, supplier or service provider.
- 3.2.2. **Probity** - It must be demonstrable that all parties are dealt with on a fair and equitable basis and that there is no private gain, favouritism or corruption involved in any dealings of the Trust.
- 3.2.3. **Accountability** -The Trust is publicly accountable for its expenditure and for the conduct of its affairs. To support this, appropriate records by the GLT Head of Procurement must be maintained on all procurement opportunities and shared with the Procurement Shared Service Team for inclusion in the Trust Contract Register.
- 3.2.4. **Value for Money** - The achievement of value for money underpins the appropriate use of all public funds. Therefore, as well as striving to achieve the best price possible for all purchases, members of staff should also give consideration to other factors such as quality, suitability, availability, reliability of the supplier, terms available etc.

4. What is Procurement?

- 4.1. Procurement is the process through which goods, services and works are acquired. The procurement process spans a lifecycle from identification of need and resources, through selection of suppliers, purchasing, contract management and disposal. Purchasing is the transactional process of buying the goods/services and is just one part of Procurement.

5. Chartered Institute of Procurement and Supply Code of Conduct

- 5.1. The Chartered Institute of Procurement & Supply has a Code of Conduct which the Procurement Team complies with.
- 5.2. The following four key principles must be applied by all Trust Staff:
 - 5.2.1. Staff must not allow or promote suspicion of any conflict between official and private interests.

- 5.2.2. Members of staff must not be influenced by any gift/consideration or show favour or disfavour to any person or organisation.
- 5.2.3. Relationships and interactions with suppliers must be honest, fair and even-handed.
- 5.2.4. Standards must be promoted through leadership and supported by systems, procedures and policy.

6. Procurement Regulations

- 6.1. Procurement Law sets out the legal framework for public procurement and applies when public authorities and utilities seek to acquire supplies, services or works. It sets out procedures which must be followed before awarding a contract when its value exceeds set thresholds.
- 6.2. As a contracting authority, irrespective of the source of funding for a particular purchase, GLT must follow the Procurement Law directives. Because of the importance of getting a good quality specification it is essential to plan early as procurement procedures can be lengthy. Members of staff with an order or contract expenditure which has lifecycle costs approaching the procurement threshold (currently £179,089 for goods and services and £4,477,174 for works (exclusive of VAT) must consult with the Procurement Shared Service Team as early as possible to avoid any delays.
- 6.3. Breaches of Procurement Law may incur other penalties from HM Treasury or the Department for Education. Members of staff should therefore notify the Procurement Shared Service Team of anticipated high value expenditure at their earliest opportunity.
- 6.4. When a tender process is not subject to the regulations (for example because the estimated value of a contract falls below the relevant threshold), procurement principles of non-discrimination, equal treatment, transparency, mutual recognition and proportionality apply. Some degree of advertising, which is appropriate to the scale of the contract, is necessary to demonstrate transparency. This is in line with the GLT objective of achieving value for money in all public procurement.

7. Intellectual Property, Commercial Information and Personal Data

- 7.1. All procurement staff must protect intellectual property rights and commercial information from unauthorised access by third parties, or misuse by the parties bound by a contract. The GLT terms and conditions of contract show what is required. The GLT Head of Procurement may recommend having a separate confidentiality agreement if the information that the supplier/contract will have access to is highly sensitive.
- 7.2. All suppliers or third parties that require access to the information systems as part of the service they provide must follow the requirements of the General Data Protection Regulations.
- 7.3. Where a supplier or contractor will have access to personal data it will be regarded as a 'data processor' as defined by the UK General Data Protection Regulation (UK GDPR) and the GLT Data Protection Policy. In such cases, the Headteacher needs to notify the GLT Head of Procurement. It will be the Headteacher's responsibility to seek advice from the GLT Data Protection Officer.

Headteachers will be required to complete a data protection risk assessment as part of the process and further Data Protection Impact Assessment (DPIA) might be deemed appropriate in certain cases. Once any personal data risk has been assessed, the GLT Head of Procurement will arrange for a Third-Party Data Processing Agreement to be drawn up and included with the contract award documentation or the supplier or contractor to sign and commit to.

- 7.4. Contract records should be retained for six years beyond contract expiry in conformance with the GLT Data Retention Policy and Information Records Management Service guidance. The Procurement Shared Service Team will retain records in electronic format within the Contract Register.
- 7.5. In the event of a contract being transferred or terminated, appropriate provisions must be in place to ensure the continued security of information and systems. Suppliers/third parties will be asked where appropriate to demonstrate their compliance with GLT policies.

8. Supplier Sourcing, Contracting and Achieving Value for Money

- 8.1. The Procurement Shared Service Team will develop a rolling procurement schedule and, where appropriate, will consult with Headteachers and Heads of Service on the potential to develop a range of Trust wide or regional contracts to follow the requirements around aggregation and value for money.
- 8.2. Competition promotes efficiency and effectiveness in expenditure. Awarding contracts on the basis of value for money following competition contributes to the competitiveness of supplies. Therefore, the Procurement Shared Service Team will advertise Trust supply requirements where the procurement thresholds show competition is necessary. The GLT Head of Procurement will place advertisements on Contracts Finder or the Central Digital Platform - previously known as the Find a Tender Service using the Trusts e-Procurement Portal to ensure that competition is open.
- 8.3. Contracts will be awarded on the basis of who has provided the most advantageous tender (MAT). This is one where it is not only the costs that are important, but also consideration is given to capability, delivery and added value.
- 8.4. Value for money is the optimum combination of whole life cost and quality (or fitness for purpose) to meet the user's requirement. This is rarely possible with the lowest price alone. To ensure that all purchases obtain optimum value for money, a range of procurement procedure guides and templates outlining the steps to be taken for varying levels of procurement are available. All purchases must be made in accordance with these guides, except in exceptional circumstances where a dispensation has been granted by the GLT Head of Procurement.
- 8.5. Purchases over £179,089 must be managed by the Procurement Shared Service Team through a procurement process, and in these cases early involvement is recommended to ensure expectations are clear and timelines are achievable.
- 8.6. Formal contracts should be documented and issued by the Procurement Shared Service Team for all goods and services. Contracts should only be signed in accordance with Finance Policy and Schedule of Financial Delegation.

8.7. Where there is an issue concerning terms and conditions, whether GLT's own or that provided by a supplier, then members of staff should refer these to the Procurement Shared Service Team for advice and direction. The Procurement Shared Service Team may seek formal commercial law advice if required.

9. Request for Quote (RFQ)

9.1. A Request for Quote (RFQ) is our standard process used to gain price quotations from suppliers for specific products, services or works. The objective is to ensure a fair, transparent, and efficient procurement process that maximises educational value within allocated budgets. Guidance and support are available on the GLT Finance and Procurement intranet site or by contacting the procurement team.

9.2. The RFQ route allows us to select vendors who demonstrate a strong understanding of the requirements and can provide high-quality goods or services. The evaluation process will consider factors beyond just price, including but not limited to: quality of proposed solutions, vendor experience, adherence to delivery schedules, customer support, and alignment with strategic goals.

9.3. All responses will be treated with confidentiality and evaluated impartially by a designated committee. We reserve the right to request clarifications, conduct vendor interviews, and negotiate terms as necessary to ensure the best possible outcome. The selected vendor will be chosen based on the proposal that offers the most advantageous combination of quality, cost-effectiveness, and responsiveness to our specific requirements. This process is undertaken to ensure that public funds are utilised responsibly and that our students and educators receive the highest quality resources and support.

10. Tendering

10.1. Tendering procedures may take up to 12 months or longer depending on contract/service complexity, lifecycle costs and compliance with Procurement Law. Failure to programme sufficient time for procurement will not be a reason to grant dispensation.

10.2. Subject to the thresholds in Appendix 1, competition should be proportionate to the level of expenditure, complexity and risk.

10.3. There are two forms of tender procedure - open , and competitive flexible-- and the circumstances in which each procedure should be used are described below. The Tenders must be sought on the most appropriate basis.

10.3.1. **Open Procedure:** This is a single stage process suited to clearly defined tenders whereby a tender is advertised, evaluated and awarded. There is no restriction on who may submit tenders.

10.3.2. **Competitive Flexible Procedure:** This is a multi-stage process that provides greater flexibility to design a process that fits the objectives of the Trust. Multi stages can

include market engagement, site visits, technical presentations and pilots enabling a greater range of supplier engagement approaches.

10.4. As a minimum the tender pack must contain:

- 10.4.1. The tender document detailing any minimum criteria the supplier must meet and the tender return date.
- 10.4.2. Detailed specification requirements including pricing schedule where applicable.
- 10.4.3. Evaluation criteria against which the submitted tender will be evaluated. This must include details of criteria, sub criteria and weightings that are being applied and details of the information that the tenderer needs to include in their response.
- 10.4.4. GLT Purchase Order Terms and Conditions.

10.5. Detailed specifications are key to the success of good procurement. It is the responsibility of the Headteacher or Head of Service to draft final specifications in order that the final tender pack meets the needs of the Headteacher or the person requesting goods/services/works.

10.6. Care should be taken to specify accurately the goods/services required in a way which is unambiguous, offers equality, and removes barriers to participation by Small and Medium Enterprises and self-employed people without discriminating against others.

10.7. Any post tender bid clarification with suppliers will be led by the Procurement Shared Service Team.

10.8. Any communication with the suppliers involved in the tender process will be facilitated by the Procurement Shared Service Team utilising the Trust e-Tendering Portal during the tender process and via email once the tenders have been received.

11. Dispensations

11.1. In limited circumstances a dispensation from the requirement to obtain alternative quotes may be granted by the GLT Head of Procurement. This may include authority to solicit a single quotation, to award a contract or place an order without having obtained the requisite number of tenders or quotations or to directly award a contract.

11.2. All dispensations require prior approval from the GLT Head of Procurement before progressing and must not result in a breach of procurement legislation or be contrary to the Finance Policy; Schedule of Financial Delegation.

11.3. All dispensation requests, whether approved or rejected, will be reported to the Finance, Operations and Performance Committee. For purchases over £10,000, Headteachers will be required to submit a suitable business case to the GLT Head of Procurement to explain the reasons for requesting a dispensation.

- 11.4. Dispensations from the requirement for competitive quotations/tenders must not be used to avoid competition, or for administrative convenience, or to award fresh/further work to a supplier originally appointed through a competitive procedure.
- 11.5. All dispensations will be subject to obtaining and documenting appropriate evidence for single quotation/tender action, obtaining authorisation for such action in accordance with the relevant Schedule of Financial Delegation and never breaching current Procurement Law or the relevant procurement thresholds.
- 11.6. Subject to approval as outlined in the Trust Schedule of Financial Delegation, dispensations may be granted for the following reasons:
 - 11.6.1. Unforeseen emergency requirement.
 - 11.6.2. The goods or services are only available from one source and there is no possibility of the Trust's requirements being met in any other way.
 - 11.6.3. An extension is required to a current contract in order to allow sufficient time to complete a competitive tendering exercise (but failure to have planned the re-procurement would not be justification for a single tender).
 - 11.6.4. Where the seeking of tenders and subsequent contract award could cause significant operational difficulties and where any potential savings would be outweighed by those operational issues (which along with a Value for Money analysis must be documented). Contract awards should be approved in accordance with the Finance Policy and the Schedule of Financial Delegation. Advice and approval should be sought from the Head of Procurement in terms of compliance with UK legislation and subsequently reporting to the Finance & Operations Performance Committee.
- 11.7. A record of the reason(s) for the seeking and granting/declining of dispensations will be kept for at least six years.

12. Using existing framework arrangements

- 12.1. The Trust will, wherever possible, use collaborative procurement in the sourcing of goods and services to achieve value for money. This may involve the use of framework agreements negotiated nationally, for the sector, or locally with other partners.
- 12.2. It is preferred that closed mini-competitions are conducted if requirements can be met through pre-existing frameworks. Preference is given to frameworks that require the additional completion of a mini competition; this ensures that suppliers have been pre-approved, that maximum charge rates should be known and that terms and conditions of engagement are pre-agreed.
- 12.3. Where a collaborative framework exists for the provision of required goods and/or services, these should be used (unless agreed otherwise by the GLT Head of Procurement) for the following reasons:

- 12.3.1. Competitive pricing, benefiting from economies of scale and greater negotiating resource in compliance with Procurement Law (for spending above the thresholds shown in [Appendix 1](#));
 - 12.3.2. Authorised suppliers on such contracts have been vetted for financial health, insurance status, trading references, health and safety, quality, and corporate and social responsibility policies;
 - 12.3.3. Redress: benefit from well-defined terms and conditions as well as support from the buying consortium should any issues arise;
 - 12.3.4. An existing framework provides adequate information on technical standards etc. and facilitates dialogue with approved suppliers, generating a more informed procurement decision and cost avoidance; and
 - 12.3.5. Utilising these frameworks, the Trust is not obliged to undertake its own fully compliant tender exercise.
- 12.4. Whenever using a framework contract, it is essential that the Headteacher considers whether:
- 12.4.1. The School is entitled to call-off from the arrangement.
 - 12.4.2. The specification and the contract terms are suitable for the school's particular needs. The terms and conditions from frameworks are generally set in advance and cannot be changed beyond the mechanism set out in the framework.
- 12.5. Headteachers and Heads of Service must follow the framework's guidance, particularly about how orders should be placed. Headteachers and Heads of Service must seek the advice from the Procurement Shared Service Team. This will generally permit either direct awards of contracts to a supplier and/or a further round of mini competition between all suppliers with capacity to deliver the requirement on the framework.

13. Sustainability

- 13.1. All Trust procurement should take account of environmental, social and economic factors; and should include but not be limited to, looking at what products are made of, where they have come from and who has made them.
- 13.2. Suppliers will be encouraged to remove packaging at the point of delivery to us. The Trust will work with suppliers to ensure that they have robust recycling procedures in place and are actively addressing waste reduction across their organisation.
- 13.3. The Trust applies the principle of 'whole life costing' to promote sustainable procurement. This looks at all life-cycle costs (including disposal costs) of a product or service and makes sure they are minimised.
- 13.4. The Procurement Shared Service Team will use sustainability criteria, for instance the [Government Buying Standards](#), and will consider supplier policies for waste, transport, energy, procurement and

staff awareness of environmental impact in its selection/award questionnaire and specification. It will also use the criteria in the tender evaluation and may ask suppliers to submit alternative goods or services that are more sustainable.

- 13.5. Where sustainability factors in the supply chain are particularly important, the Procurement Shared Team will speak to the supplier to understand the sustainability risks and how they are managed and mitigated.
- 13.6. The Trust will encourage the supply base to investigate and minimise the environmental impacts of supplying the Trust, including resource use, waste, energy consumption and carbon emissions.

14. Financial Authority to Commit Expenditure

- 14.1. The Trust operates a system of delegated financial authority under which Headteachers are responsible for the decision-making process and planning of purchasing decisions. In accordance with this Procurement Policy for lower value purchases the GLT Head of Procurement may provide technical and professional support if requested. However, where the value of planned purchases exceeds £25,000 to the threshold levels detailed in [Appendix 1](#) the Procurement Shared Service Team must be consulted and will provide support and guidance.
- 14.2. Contracts of any length require approval from the GLT Head of Procurement or as per the Trust Shared Service Schedule of Financial Delegation. All contracts must be included in the Trust Contract Register.
- 14.3. Any process which involves committing the school/ Trust to expenditure must be approved in accordance with the GLT Finance Policy and the relevant Schedule of Financial Delegation. The Schedule of Financial Delegation confirms who has the authority and to what financial level.
- 14.4. A number of exclusions are applicable to a Purchase Order being raised beforehand - for example, this would apply to certain supplies of agreed services such as, and not limited to, property rates, energy costs and school insurance.
- 14.5. No member of staff is authorised to commit to expenditure without first ensuring that there is adequate budget provision, a Purchase Requisition has been approved by the budget holder and a Purchase Order has been raised/issued.
- 14.6. Schemes of work should not be artificially broken down into smaller orders to phase the generation of purchase orders and thereby circumvent either authorisation levels or the requirement to obtain further quotes/tenders.

15. Purchasing Thresholds

- 15.1. Subject to the GLT Finance Policy and relevant Schedule of Financial Delegation thresholds, competitive purchasing should be proportionate to the level of expenditure, complexity and risk. This minimises procurement costs for the Trust and suppliers, avoids doubt and ensures compliance with legislation, best practice and the Finance Policy.

- 15.2. There are two types of thresholds governing procurement.
- 15.2.1. authority to commit expenditure, which is covered in the GLT Finance Policy and Schedule of Financial Delegation, and
 - 15.2.2. the procurement threshold levels which are governed by the anticipated lifecycle cost of the procurement.
- 15.3. Where the purchase is being made from a contract/framework agreement that has been through a compliant tender process in line with Procurement Law, then an order may be placed without having to follow the above procurement processes providing that it follows any procedures set out under the contract. The Procurement Shared Service Team will be able to advise on the correct procedure and provide advice on the relevant frameworks.
- 15.4. Procurement Threshold Levels for Goods and Services: The various transactional thresholds and procurement process required is covered in detail in the associated procurement process guides which must be followed. Values of thresholds relate to the full life cycle of the financial commitment such as contract extensions.

Procurement Threshold Levels for Goods and Services	
Level 1 Up to £5,000	<p>Goods & Services Budget holders should review the Trust’s preferred supplier list and ensure that they review the use of existing resources considering the cost, quality, reliability and availability according to best value principles, before ordering goods and services. At least one written quote should be submitted with the purchase requisition</p> <p>Contracts All Contracts require the approval of the GLT Head of Procurement and must be added to the Trust Contract Register.</p>
Level 2 £5,000 to under £25,000	<p>Goods & Services In addition to Level 1 requirements, two quotations should be obtained for all orders within the Level 2 threshold, to ensure that best value is achieved. All quotations should be compared on a like-for-like basis and submitted with the purchase requisition. Guidance is available from the GLT Head of Procurement on obtaining appropriate quotes.</p> <p>Contracts All Contracts require the approval of the GLT Head of Procurement and must be added to the Trust Contract Register.</p>
Level 3 £25,000 up to £179,089	<p>Goods & Services At least three written quotations should be obtained for all orders within the Level 3 threshold, to ensure that best value is achieved. All quotations should be compared on a like-for-like basis and submitted with the purchase requisition. Guidance is available from the GLT Head of Procurement for obtaining appropriate quotes.</p> <p>Contracts All Contracts require the approval of the GLT Head of Procurement and must be added to the Trust Contract Register.</p>

Procurement Threshold Levels for Goods and Services

Level 4	Goods, Services & Contracts
Over £179,089	<p>All Goods, Services & Contracts with a value over £179,089 including aggregated purchases are subject to formal tendering procedures. All tenders must be conducted with full consultation, management and approval of the GLT Head of Procurement.</p> <p>Following a successful tender, the final contract must be signed by the GLT Head of Procurement</p> <p>Contracts</p> <p>All Contracts require the approval of the GLT Head of Procurement and must be added to the Trust Contract Register.</p> <p>Trustee Oversight</p> <p>For all procurement above Procurement Law thresholds detailed in Appendix 1, the Board of Trustees will be notified of the procurement route and timescales and may appoint a Trustee to be a member of the procurement panel.</p>

- 15.5. Procurement Threshold Levels for Works: The various transactional thresholds and procurement process required is covered in detail in the associated procurement process guides which must be followed. Values of thresholds relate to the full life cycle of the financial commitment such as contract extensions.

Procurement Threshold Levels for Works (Estates Capital Projects) The Trust Shared Service Only	
Level 1 Up to £5,000	<p>Works Budget holders should review the Trust’s preferred supplier list and ensure that they review the use of existing resources considering the cost, quality, reliability and availability according to best value principles, before ordering goods and services. At least one written quote should be submitted with the purchase requisition</p> <p>Contracts All Contracts require the approval of the GLT Head of Estates and must be added to the Trust Contract Register (Estates Section).</p>
Level 2 £5,000 to under £25,000	<p>Works In addition to Level 1 requirements, two quotations should be obtained for all orders within the Level 2 threshold, to ensure that best value is achieved. All quotations should be compared on a like-for-like basis and submitted with the purchase requisition. Guidance is available from the GLT Head of Procurement on obtaining appropriate quotes.</p> <p>Contracts All Contracts require the approval of the GLT Head of Estates and must be added to the Trust Contract Register (Estates Section).</p>
Level 3 £10,000 up to £4,477,174	<p>Works At least three written quotations should be obtained for all works contracts within the Level 3 threshold, to ensure that best value is achieved. The Request for Quote (RFQ) process must be used. Guidance is available from the GLT Head of Procurement for obtaining appropriate quotes.</p> <p>Contracts All Contracts require the approval of the GLT Head of Estates and must be added to the Trust Contract Register (Estates Section).</p>
Level 4 Over £4,477,174	<p>Works All Works Contracts with a value over £4,477,174 including aggregated purchases are subject to formal tendering procedures. All tenders must be conducted with full consultation, management and approval of the GLT Head of Procurement. Following a successful tender, the final contract must be signed by the GLT Head of Procurement</p> <p>Contracts All Contracts require the approval of the GLT Head of Procurement and must be added to the Trust Contract Register.</p> <p>Trustee Oversight</p>

Procurement Threshold Levels for Works (Estates Capital Projects) The Trust Shared Service Only

For all procurement above Procurement Law thresholds detailed in [Appendix 1](#), the Board of Trustees will be notified of the procurement route and timescales and may appoint a Trustee to be a member of the procurement panel.

16. Preferred Supplier Register

- 16.1. A preferred supplier is one with whom an agreement/contract which could include price discounts, delivery arrangements, customer service requirements, etc. for a specified period of time, has been chosen by the Procurement Shared Service Team. The Preferred Supplier Register formalises the relationship with suppliers who are selected based on procurement volume, quality and strategic and economic benefits to the Trust.
- 16.2. A preferred supplier may also be a supplier who is part of a purchasing consortium which provides national and/or regional contracts. These consortium suppliers offer deeper discounts because of the combined purchasing volume of the Trust.
- 16.3. For a supplier to be included in the register the Procurement Shared Service Team will complete a competitive selection process.
- 16.4. Suppliers on the register are deemed to have met the Trust requirements for Best Value and therefore any purchases made through them are not subject to obtaining the required quotes.

17. Mandatory Suppliers

- 17.1. In certain cases, suppliers will be selected by the GLT Head of Procurement as a mandatory supplier to ensure consistency across the Trust. When looking at a potential supplier, Headteachers must check the Mandatory Supplier Register to ensure that a service is not duplicated.
- 17.2. For a supplier to be included in the Mandatory Supplier register the GLT Head of Procurement will complete a competitive selection process.
- 17.3. Suppliers on the Mandatory Supplier register are deemed to have met the Trust requirements for Best Value and therefore any purchases made through them are not subject to Headteachers obtaining the required quotes.

18. Supplier Debarment

- 18.1. Under the Procurement Act 2023, contracting authorities have crucial obligations regarding debarment checks. The Contracting authority must review the list prior to selecting suppliers to award the supply of goods/services or works.
- 18.2. This list identifies suppliers excluded from public contracts due to past misconduct or circumstances posing risks. If a supplier is on the debarment list for a mandatory exclusion ground, the contracting authority must exclude them. For discretionary exclusion grounds, the authority retains some discretion, but must carefully consider the debarment. These checks are essential for ensuring integrity and minimising risks in public procurement.

19. Supplier Management

- 19.1. Purchase Orders, Contracts and Payments should only be raised/made to suppliers which have passed the Trust's vetting procedures and have been added to the finance system.
- 19.2. New suppliers may only be added to the finance system following completion of a new supplier form and the requisite approval process by the Procurement Shared Service Team has been completed.

20. Contract Agreement/Terms and Conditions

- 20.1. All procurement should be carried out using the Trust terms and conditions as outlined in the various procurement procedure guides and templates. There may be certain exceptions to this, for example when an established framework is being used.
- 20.2. Any agreement, contract or operating lease with a supplier which requires a signature by a budget holder/Headteacher/member of Procurement staff (not including general orders for goods and services) should be forwarded to the Procurement Shared Service Team for approval prior to signature.
- 20.3. A signature on an agreement or contract, or even an email response, indicates that the Trust accepts the supplier's terms and conditions which may not be favourable.
- 20.4. Following the identification of the most favourable offer, whether by best value, quotation or tender, consistent with the thresholds identified above, contracts may only be awarded by those officers to whom the Trust Board has delegated such authority within the approved Finance Policy and Schedule of Financial Delegation.

21. Data Protection Impact Assessments (DPIAs)

- 21.1. A DPIA is mandatory for any procurement that involves a new or changed way of processing personal data that is likely to result in a high risk to the rights and freedoms of individuals. The Procurement Team, in conjunction with the Headteacher or budget holder, must consult the Trust Data Protection Officer (DPO) at the outset of such procurements.
- 21.2. **Requirement for a Data Processing Agreement (DPA)** - Where a supplier will process personal data on behalf of the Trust, a DPA must be in place. The Trust's standard DPA must be used unless an alternative has been approved by the Trust DPO. The DPA must be signed before any personal data is shared.
- 21.3. **Contractual Clauses** - All contracts with suppliers processing personal data must include clauses that require them to:
 - Act only on the written instructions of the Trust.
 - Ensure their staff are subject to a duty of confidence.
 - Implement appropriate technical and organisational measures to ensure data security.
 - Not engage a sub-processor without the Trust's prior written consent.

21.4. **Supplier Due Diligence** - All suppliers processing personal data on behalf of the Trust must provide evidence of appropriate data protection and information security measures as part of the procurement process. This may include certification (e.g., ISO 27001), policies, or other assurances deemed necessary by the Trust DPO.

21.5. **Breach Reporting** - Suppliers must notify the Trust immediately, and no later than 24 hours after becoming aware of any personal data breach or security incident involving Trust data.

22. Insurance

22.1. It is essential that procurement staff ensure that suppliers have in place acceptable levels of insurance indemnity cover for public liability, and employer's and professional indemnity as relevant. Advice on relevant levels can be obtained from the Procurement Shared Service Team.

23. Payment and Payment Terms

23.1. All invoices from suppliers should be entered onto the finance system immediately and the invoice placed on hold to await approval. This includes purchases by procurement staff via a purchasing card.

23.2. Unless a purchasing card has been used to make a payment, all invoices from suppliers should be paid by BACS once approved.

23.3. The Trust's standard payment terms are 30 days following receipt of a correct invoice, unless alternative arrangements have been agreed by procurement staff at purchase order stage.

23.4. Payment should only be made on receipt of goods. Where services are being procured then payment for work in progress or agreed interim stages may be appropriate in accordance with the approved guidance and subject to approval by the GLT Head of Finance.

24. Aggregation Rule

24.1. Procurement Law sets out how and when multiple orders and contract values for the same type of work should be added together for the purposes of deciding what procurement process is applicable.

24.2. As Headteachers and Heads of Service manage their own budgets and purchasing decisions independently, spending under £10,000 in this instance does not aggregate across the Trust.

24.3. Headteachers and Heads of Service do need to consider aggregation when expenditure reaches over £10,001. To ensure that Headteachers and Heads of Service do not fall foul of this, a procurement plan will be required for all procurement activities within a twelve (12) month cycle. This will enable the GLT Head of Procurement to identify where activity such as contracts being rolled over are proposed and take appropriate action to re-procure on behalf of a school.

24.4. In appropriate circumstances the GLT Head of Procurement may identify opportunities to establish regional or corporate contracts on behalf of Headteachers or Heads of Service. Headteachers or

Heads of Service will be invited to participate, though in such cases the GLT Head of Procurement will work on the basis that this expenditure does aggregate and procure accordingly.

25. Annual Procurement Plans

- 25.1. The GLT Head of Procurement will complete an annual procurement plan setting out key tender activity and milestones. The plan will include the use of the contract list to plan the requirement for future tenders for on-going reviews of contracts, strategic areas of development, and any policy and procedural developments that are required.
- 25.2. Headteachers and Heads of Service are required to complete an annual procurement plan following procurement procedure guidance detailing key purchases for the year with a lifecycle cost in excess of £10,000. This is to enable the Procurement Shared Service Team to identify any opportunity to procure similar services either regionally or Trust wide, exploit value for money opportunities and identify potential aggregation or breaches to thresholds.
- 25.3. The Trust is committed to the preparation and the continued development of the procurement plan. The GLT Head of Procurement will continually review the procurement requirements of the Trust whilst complying with all relevant legislation.
- 25.4. The practice of renewing annual contracts is not permissible unless specific provision has been made within the original procurement process for contract extensions. Re-procurement should feature on the annual procurement plan and be commenced in a timely manner to ensure the completion and transfer to a new contract is managed effectively.
- 25.5. To avoid the inefficiencies of re-procuring services annually, the GLT Head of Procurement will work with Headteachers and Heads of Service to review procurement plans and develop multi-year contracts both nationally and regionally.

26. Reporting Requirements to the Board of Trustees

- 26.1. The Finance and Operations Performance Committee will be provided annually with a planned procurement pipeline, identifying planned procurement above Public Procurement Regulations thresholds and key trust wide tenders.
- 26.2. The Board of Trustees will be notified annually of all planned procurement above Procurement Law thresholds and may appoint a Trustee to be a member of the procurement panel, procurement sponsor or provide oversight.
- 26.3. For procurement over £179,089 the award decision and procurement route will be reported annually to the Finance and Operations Performance Committee.
- 26.4. The Finance and Operations Performance Committee and appropriate link Trustee has oversight of the operation and outcomes of the Trust's procurement procedures.

27. Contracts Register

27.1. The Procurement Shared Service Team will maintain a contract register detailing all contracts held and undertaken by the Schools and the Trust Shared Services which records all related documentation, details of the winning bidder, price, duration of contract and the procurement process followed.

28. Related Party Transactions

28.1. All Trust staff must ensure when awarding contracts or placing orders that they are at all times in full compliance with the requirements of the Academy Trust Handbook and GLT Finance Policy in relation to Related Party Transactions.

28.2. Parties included within this term are all members, Trustees, governors and senior Trust staff as well as their relatives and any organisations owned, managed or controlled by those individuals.

28.3. Where a related party is identified, normal procurement procedures should be followed with the addition of approval from the Board of Trustees noted before the purchase is confirmed.

28.4. A register of all related party transactions will be maintained by the Head of Procurement.

29. Procedural and Guidance Notes and Templates

29.1. To ensure consistent and compliant processes, the Procurement Shared Service Team has provided a range of procedure documents, guides and templates outlining the process all Trust staff must follow when undertaking procurement and purchasing.

29.2. The guides are reviewed and updated from time to time by the Procurement Shared Service Team to ensure compliance with legislation and best practice.

29.3. The following procedure documents are applicable:

- Obtaining two or three quotations
- Seeking dispensations
- Raising requisitions and orders
- Adding new supplier
- Works (including Payments, Variations, Certification, etc)
- Specification drafting

30. Retention of Documents

30.1. Tender or quotation documentation should be retained for a minimum of six (6) years from the date of the end of the contract. Documentation may be retained electronically rather than in hard copy, but it must be readily accessible for audit or other purposes if required.

30.2. Where procurement is undertaken on behalf of a Headteacher or Heads of Service by the Procurement Shared Service Team, all documentation in relation to the procurement process will be retained centrally. Headteachers or Heads of Service need not hold local copies and can rely on notification from the Procurement Shared Service Team that the Trust Financial Regulations and relevant procurement legislation have been complied with. The records held centrally are available should auditors wish to inspect them.

31. Monitoring and Audit

31.1. The Trust and its schools are subject to scrutiny by internal and external auditors as well as the ESFA and other government departments/organisations. It is the responsibility of everyone involved in the purchasing process to ensure that they comply with current policies, procedures, guidance and legislation.



Procurement Thresholds Services & Goods

Level 1	Level 2	Level 3	Level 4
Up to £5,000	£5,000 to £25,000	£25,000 to £179,089	Over £179,089
<p>Preferred Suppliers - Up to £25,000</p> <p>Preferred suppliers allow you spend up to £25,000 per transaction without the need to provide any further quotes. The procurement team have fully assessed the suppliers on the list, so you don't need to anything else.</p> <p>Please note that you cannot separate out an order if the value is over £25,000.</p>			<p>Tender</p> <p>Procurement Team Managed – Tender Issued</p> <p>Approval required the GLT Head of Procurement.</p> <p>Managed by eProcurement Portal and advertised on Contracts Finder/Find a Tender Service</p>
<p>Contracts</p> <p>A contracts of any length requires the approval from the GLT Head of Procurement.</p>			<p>Best Value Principles</p> <p>The achievement of value for money underpins the appropriate use of all public funds, therefore as well as striving to achieve the best price possible for all purchases, consideration should also be given to other factors such as quality, suitability, availability, reliability of the supplier, terms available etc.</p> <p>When planning a purchase or a service contract; the effective, efficient, and economic use of resources, requires that an evaluation of relevant costs and benefits along with an assessment of risks, non-price attributes, and/or whole life costs, be considered before being requested.</p> <p>If in doubt at any point when deciding on quotes, please review the guidance documents available on the Finance & Procurement Intranet.</p>
<p>Goods & Services - Documentation</p>			
At least one written quote, following best value principles	At least two written quotes, following best value principles	Contact the Procurement Team for Support. Complete a Request for Quote (RFQ) process	

Note All values are excluding VAT

Procurement Thresholds Works (Estates Capital Projects) Trust Shared Service Only

Level 1	Level 2	Level 3	Level 4
Up to £5,000	£5,000 to £25,000	£25,000 to £4,477,174	Over £4,477,174
Contracts			Tender
A contracts of any length requires the approval from the GLT Head of Procurement.			Procurement Team Managed – Tender Issued Approval required the GLT Head of Procurement. Managed by eProcurement Portal and advertised on Contracts Finder/Find a Tender Service
Works - Documentation			
At least one written quote, following best value principles	At least two written quotes, following best value principles	Contact the Procurement Team for Support. Complete a Request for Quote (RFQ) process	Best Value Principles
			The achievement of value for money underpins the appropriate use of all public funds, therefore as well as striving to achieve the best price possible for all purchases, consideration should also be given to other factors such as quality, suitability, availability, reliability of the supplier, terms available etc. When planning a purchase of a works contract; the effective, efficient, and economic use of resources, requires that an evaluation of relevant costs and benefits along with an assessment of risks, non-price attributes, and/or whole life costs, be considered before being requested. If in doubt at any point when deciding on quotes, please review the guidance documents available on the Finance & Procurement Intranet.

Note All values are excluding VAT