



Blue Coat

Church of England Academy

Procurement policy

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	Signature	
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Numbers 10:32: “If you come with us, we will share with you whatever good things the LORD gives us.”

Blue Coat Church of England Academy is an inclusive Christian learning environment, our school values underpin all of our policies: Wisdom, Endurance, Service, Kindness and Hope.

1. Aims and scope

This policy aims to ensure that:

- The Academy’s funds are used only in accordance with the law, its articles of association, its funding agreement and the Academy Trust Handbook
- The Academy’s funds are used in a way that commands broad public support
- Value for money (economy, efficiency and effectiveness) is achieved
- Conflicts of interest are managed adequately and appropriately
- The Academy has open and transparent procurement procedures
- All staff involved in procurement are aware of the procedures they must follow
- Procurement procedures are compliant with procurement legislation

This policy includes procedures for open tenders. This approach allows any supplier who is qualified and eligible to submit a bid to supply goods, works or services required and offers an equal opportunity to any supplier to submit a proposal.

2. Legislation and guidance

The Academy will seek legal and/or professional procurement advice where procurement activity is complex, high-risk, novel, contentious, or where compliance with procurement legislation requires specialist interpretation.

This policy is based on:

- [The Academy Trust Handbook](#)
- [Department for Education \(DfE\) guidance on buying for schools](#)
- [Department for Education \(DfE\) guidance on the Schools Financial Value Standard \(SFVS\) checklist](#)
- [Procurement Act 2023](#)

3. Purchase thresholds

Low to high-value purchase thresholds

Purchase levels are divided into the following:

- Low-value purchase: £0 – £10,000
- Medium-value purchase: £10,000 – £50,000
- High-value purchase: over £50,000, but below the public procurement threshold

All values above are **excluding VAT**.

Public procurement threshold

If it is estimated that the cost of a contract is near to or above the threshold for public procurement spending, the Academy will seek legal advice to ensure it runs a buying process compliant with the Procurement Act 2023. The current thresholds are:

- **£207,720** (inclusive of VAT) for the supply of goods and services

4. Approval authority

CONTRACT LEVEL	CONTRACT VALUE	APPROVAL LEVEL	ROUTE TO BUY
Low – More than one quote is not required	£0 – £10,000	Principal/ Vice Principal/ Chief Financial Officer	Route 2
Medium – 3 Quotes	£10,000 – £50,000	Principal/ Vice Principal/ Chief Financial Officer up to £25,000	Route 3
		Directors over £25,000	
High – Formal Tender Process	Over £50,000, but below the public procurement threshold	Directors	Route 4
Over the public procurement threshold (goods and services)	Over £207,720	Directors	Route 5

5. Preparing to buy

To secure best value and maintain records of the decision-making process, all staff involved in procurement decisions must follow this policy and the stated process for each new procurement.

Write specification

This is required for all purchases over £10,000. The specification should set out relevant requirements, including:

- The price of the goods, works or services
- Technical specifications
- Quantity
- Quality
- Delivery schedule

For higher value purchases, it may be appropriate for the Academy to conduct soft market testing by speaking to suppliers at this stage. Any information provided to suppliers at this stage will also be shared with suppliers who bid later. The specification will not favour the suppliers we have spoken to.

Value of contract

The value of a contract will be determined by calculating the estimated whole-life value of the goods, works or services, including:

- The price of the goods, works or services
- Delivery charges
- Maintenance and support costs
- Disposal costs

We will not divide a single contract into smaller contracts to bypass the purchase thresholds as set out in section 3.

The cost will affect which buying process we use.

Identify route to buy

Following DfE guidance on buying for schools: how to buy what you need, we will follow 1 of the below 5 routes to buy, according to the value of the contract.

- **Route 1:** framework agreement for goods and services (all values)
- **Route 2:** Use supplier catalogues, websites, retail stores and other appropriate sources to compare similar products and choose the supplier that meets our requirements and offers best value for money (low value). More than one quote is not required but it may be considered appropriate to ensure best value is achieved
- **Route 3:** get quotes from at least 3 suppliers (medium value)
- **Route 4:** run a buying process inviting suppliers to submit bids for (for high value contracts below the public procurement threshold)
- **Route 5:** run a buying process compliant with the Procurement Act 2023 (high value contracts above the public procurement threshold)

6. Routes to buy

Route 1 - Framework agreements

The Academy will consider the use of Crown Commercial Service (CCS) and other recognised public sector framework agreements where appropriate, to support compliant and value-for-money procurement activity.

Framework agreements are arrangements that a contracting authority, such as a public sector buying organisation, makes with suppliers. Framework agreements are the preferred route, as:

- They have already been through a tender process
- They have favourable terms and conditions
- The framework provider may offer advice and support

Depending on the framework we choose, we will either pick the best-value supplier from a list or run a mini-competition between listed suppliers, where we will ask each supplier to submit their bid and we will then select the best one.

In either case, we will follow the DfE guidance on procurement to ensure good practice. The reasons for the choice of framework, and for the choice of supplier, will be clearly recorded.

Route 2 – Catalogues for purchasing low value goods

£0 - £10,000

Use supplier catalogues, websites, retail stores and other appropriate sources to compare similar products and choose the supplier that meets our requirements and offers best value for money (low value). Staff are also free to carry out their own research and find alternative suppliers, if these offer better value for money.

More than one quote is not required but it may be considered appropriate to ensure best value is achieved.

Route 3 – Getting 3 quotes for medium-value purchases

£10,000 - £50,000

We will use this process if we cannot meet our requirements through a framework or a catalogue.

We will secure quotes from at least 3 suppliers. These will be assessed following the process set out in section 7.

All suppliers will be provided with the same information, which will include:

- The specification
- Date by which we require the quote
- When our decision will be made
- How the supplier can ask questions about what we're buying or our process

We will assess the quotes using the award criteria provided to the suppliers and proceed to place the order.

Route 4 – Formal Tendering procedure for high-value purchases under the public procurement threshold

£50,000 - £207,720

The Academy will follow this process if our needs cannot be met through a framework agreement.

To ensure we secure good value, we will follow DfE guidance and seek specialist support as necessary.

To initiate the procurement the Academy will advertise a requirement notice. This notice will be publicly accessible and provide details of the following:

- The specification
- Evaluation criteria
- Submission deadlines, including a timeframe for the clarification period

The requirement notice will be published at least 15 working days before the submission deadline to ensure adequate time for suppliers to prepare their bids.

There will be a clarification period of 5 working days to allow potential suppliers to seek clarification on the procurement requirements and seek further information. Suppliers must submit their questions in writing. Where permitted to do so, all questions and responses will be documented and shared anonymously with all interested suppliers to ensure transparency and equal access to information.

Timescales may be extended where the complexity of the procurement requires additional time to ensure fair competition.

Tenders will be assessed following the process set out in section 7.

Route 5 - Tendering procedure for high-value purchases over the public procurement threshold Over £207,720

The Academy will only follow this process if our needs cannot be met through a framework agreement.

We will follow DfE guidance and seek specialist support as necessary to ensure that the process the Academy runs is compliant with the Procurement Act 2023.

All members of staff involved in this process must have completed the appropriate [training on the Procurement Act 2023](#).

Tenders will be assessed following the process set out in section 7, taking into account appropriate legal advice and additional requirements for purchases over the public procurement threshold.

7. Assessing bids

How we will assess bids

Before beginning a buying process that requires quotes or bids to be assessed (routes 1, 3, 4 and 5), we will determine appropriate award criteria to decide which bid best meets the specification and other factors such as price, speed and quality. These award criteria will be made available to all bidders.

The exact criteria may vary depending on the chosen procurement route. For purchases over the public procurement threshold (route 5), we will seek legal advice at this stage to ensure we meet the additional requirements for assessing bids.

Each aspect of the criteria will be scored on a scale of 1 to 5, with 5 being the highest.

Using these criteria, bids and quotes will be assessed independently by at least 2 members of staff, who will then compare scores, discuss any differences and reach a final agreed score.

Bids must be submitted by the deadline specified in the tender notice.

We will:

- Not open any bids/quotes before the deadline
- Treat all bids/quotes fairly and equally
- Record how decisions are made
- Keep confidential, secure, auditable records
- Award the contract to the highest scoring bidder

Notification of award

We will notify both successful and unsuccessful bidders in accordance with the notification requirements specified in the applicable guidance for procurements below or above the procurement threshold.

Contract finalisation

We will work closely with the winning bidder to ensure a smooth transition from the bidding process to contract execution.

There will be no commitments and no work shall begin until both parties have signed the contract.

8. Procurement Waivers

Purpose

The Academy recognises that there may be exceptional circumstances where compliance with standard procurement procedures is not feasible.

A formal procurement waiver process is therefore required to ensure that any deviation from the Academy's Financial Regulations and Procurement Policy is:

- Justified
- Transparent
- Properly authorised
- Subject to appropriate scrutiny

This ensures compliance with the Academy Trust Handbook requirement to achieve value for money and maintain regularity and propriety.

Circumstances for Use

A procurement waiver may only be used where there is a valid and evidenced rationale. Acceptable grounds include (but are not limited to):

- Urgent safeguarding requirements where delay would pose a risk to pupils or staff
- Immediate operational needs where standard procurement timescales cannot be met
- Single supplier situations, including:
 - Technical compatibility requirements
 - Intellectual property constraints
 - Proprietary systems or licensing restrictions
- Frameworks not suitable and where a full tender process is demonstrably impractical or disproportionate

Waiver Approval process

All procurement waivers must:

- Be requested in advance of commitment (wherever possible)
- Include documented justification
- Demonstrate value for money, even where competition is not undertaken. Provide supporting value for money (e.g. benchmarking, prior pricing, market knowledge)
- A clear statement of reasons for the waiver
- Obtain approval from Chair of Directors and one additional Director.

Notice to Directors of intent to use of waiver

The notice of use of waiver should contain the following:

1. A brief description of goods or services
2. The name of the supplier
3. The proposed contract term
4. The contract value
5. The reason for the waiver; and
6. Details of any changes from any previous arrangement.

Directors shall have the opportunity to object to the proposed waiver. If an objection is raised and upheld by the Board, the procurement must proceed in accordance with the appropriate procurement route set out in this policy.

9. Conflicts of interest

Register of interests

All staff and Directors are required to declare business and pecuniary interests in the Academy's register of business interests, to avoid any conflict between their business and personal interests and the interests of the Academy.

The register of interests must be updated as soon as any change in circumstances or interests are declared or identified.

Identifying and declaring conflicts of interest

Those responsible for the procurement of goods or services for the Academy will review the register of interests to identify conflicts before starting the procurement process.

A conflict of interest arises in a procurement context where there is a conflict between the interests of the person acting in relation to the procurement process and those bidding in relation to the procurement. It is where someone involved has a personal or professional interest that could influence, or be seen to influence, their decisions.

Any potential conflicts of interest in a procurement, arising from a direct or family connection, must be declared and kept under review, in accordance with our conflicts of interests policy.

Any staff member, trustee or Director who believes that a conflict of interest has not been declared must report this to the Accounting Officer David Smith.

Any person involved in a procurement process must withdraw from any discussion and must not vote on any procurement decision where they have a conflict of interest.

Declarations of interest are on the agenda at every board and committee meeting of the Academy. Any conflicts of interest must be declared, including where the conflict would result in no personal gain but might result in the appearance of bias.

- We have a clear division of duties between staff responsible for making buying decisions and those making payments
- Bids will always be assessed by staff without a conflict of interest
- Any individual within the Academy with a conflict of interest must not be involved in any part of the procurement process

Related party transactions

All related party transactions must be managed in accordance with this policy.

Where there is doubt about what constitutes a related party relationship, advice should be sought from an appropriately qualified professional.

Before conducting a related party transaction, we will:

- Perform thorough due diligence to ensure the transaction:
 - Is conducted with honesty, integrity and openness, aligning with the 7 principles of public life
 - Is in furtherance of the objects of the Academy
 - Is in the best interests of the Academy and benefits pupils
 - Demonstrates value for money, having thoroughly evaluated other options
 - Complies with the principles for managing public money
 - Does not compromise the Academy's integrity or cause reputational damage.

For all related party transactions we will:

- Report all contracts and other agreements with related parties to the DfE, in advance of the contract or agreement commencement/renewal
- Seek approval for any related party transactions where a contract or other agreement exceeds £40,000 from the DfE before confirming the transaction with the related party
- Maintain clear, secure, and auditable records of all related party transactions, including:
 - The identification and nature of the relationship that gave rise to a conflict of interest
 - The measures taken to mitigate it
 - The rationale for the decision to proceed
 - Follow-up actions taken to evaluate the goods or services against the agreed standards
- Disclose all transactions with related parties in accordance with charity law and DfE requirements
- Declare all related party transactions, regardless of value, in our annual financial statements

Any related party transactions with the following must be **at cost** only:

- Members or trustees or their companies
- Individuals or organisations related to a member or trustee including:
 - Close family members
 - Any individuals or organisations in partnership with a member or trustee, or their relative
 - A company in which a member, trustee or relative has more than 20% of the share capital or voting rights
 - An organisation controlled by a member, trustee or relative
- An individual or organisation that has the right to appoint a member or trustee
- A sponsor of the Academy

10. Anti-Fraud, Bribery and Corruption

Statement of Commitment

The Academy is committed to maintaining the highest standards of integrity, transparency and accountability in all its activities.

The Academy adopts a zero-tolerance approach to:

- Fraud
- Bribery
- Corruption
- Financial irregularity

11. Raising orders

When the best value quote is identified, suppliers will be sent a purchase order.

12. Managing contracts

The Academy maintains a contract register that is regularly shared with the Directors to make them aware of any upcoming milestones and provide them an opportunity to scrutinise and, if necessary, challenge procurement plans.

13. Record keeping

Records will be kept securely, only for as long as necessary and in line with data protection law, our privacy notices and record retention schedule (current financial year + 6 years).

Records relating to procurement processes over the public procurement threshold must be kept for at least 3 years from the date of the award of the contract.

14. Monitoring arrangements

The Chief Financial Officer is responsible for the implementation of this policy.

This policy will be reviewed and approved by the board every year. It will also be reviewed whenever public procurement thresholds or legislation changes.

15. Links with other policies

This competitive tendering policy is linked to the following policies:

- Financial Regulations Policy
- Financial Procedures Policy
- Scheme of Delegation Policy
- Record Retention Policy/Schedule
- Social Value and Sustainability Procurement Policy