

Title: Procurement Policy

Ref.: PDOC 0001

Rev: 1 Date: 19 March 2020

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TITLE

PROCUREMENT POLICY

Rev.	Date	Amendment	Approved By:	Authorised By:
1	19/03/20	Approved for use	Trustees	Finance Director
0	27/02/20	Draft	C. Johnson	C. Johnson

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Principles

1. Introduction

This policy (“**Policy**”) sets out the rules by which Washwood Heath Multi Academy Trust (the “**Trust**”) spends money, and explains the Trust's approach to the purchase of goods, works and services for its schools (the “**Academies**” or “**Academy**”).

1.2 The Trust is obliged to comply with the Academies Financial Handbook, Funding Agreements with the Department for Education (“**DfE**”), any DfE guidance including “Effective Buying for your School” and the Public Contracts Regulations 2015 (the Regulations). Under our Funding Agreements and as a charity, the Trust's board of Trustees have specific obligations to ensure value for money.

1.3 It is important to note that the Trust is the sole legal entity which can enter into contracts for itself and any Academies. The Academies themselves are not separate legal entities and any contracts awarded by individual Academies will be binding on the Trust. All spend is recorded by the Trust to comply with DfE requirements as set out in this Policy.

1.4 This Policy is mandatory and applies to everybody in the Trust and at Academies who are responsible for purchasing, whether as an employee or contractor.

2. Section 2 - Basic principles

2.1 This Policy applies to any contract for services, supplies or works which results in a payment being made by the Trust (including by an Academy).

2.2 The basic principle is that procurement should deliver value for money to the Trust.

2.3 The procurement process should be considered before any purchase is made. Not all purchasing will require a competitive procurement process and more detailed rules apply for higher value contracts.

2.4 There are specific rules under the Academies Financial Handbook in relation to some types of leasing arrangements and novel/contentious transactions which require Secretary of State consent. Leases are outside of the scope of this Policy and you should seek guidance from the Trust's Director of Finance.

2.5 All suppliers in a competition should be treated in a way which ensures equality of treatment, non-discrimination and transparency (see further information on the general principles in paragraph 14.4 below), for example:

2.5.1 All bidders must be given the same information at the same time, and no bidder should be treated more favourably than another; and

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2.5.2 There must be clear and transparent timescales, requirements, specifications and deadlines to comply with any competition.

3 Section 3 - Who can buy?

3.1 Not all employees of the Trust can buy for the Trust. The details of the individuals authorised to enter into contracts for the Trust are set out at Appendix 1. This list is updated from time to time by the Director of Finance following instructions from the Trustees.

3.2 For High Value and Upper Threshold Contracts (as set out below), prior approval must be sought from the Finance Committee

3.3 Upper Threshold Contracts exceeding £189,330 (excluding VAT) will also need approval from the Board of Trustees.

4 Section 4 - Exemptions to this Policy

4.1 This Policy must be followed in all but exceptional circumstances, and non-compliance may lead to disciplinary procedures.

4.2 Any exemptions should only be relied upon with express written consent from the Board of Trustees. You should check with the Director of Finance or the Procurement team if you are unsure about any procurement and before you place any orders/sign any contracts.

5 Section 5 - Actions before purchase

5.1 Check with the Director of Finance and Procurement whether any other Academies or departments in the Trust need to make the same purchase. If so, the spend should be included within the same contract.

5.2 Consider how the purchase is going to be sourced. Can the Trust use an existing framework agreement (see section 6 below), or can another Academy provide the requirement.

5.3 As a minimum requirement, you must set out clearly what you want to buy. This means knowing in advance what you want the goods, works or services to do, together with the quantity, maximum cost and delivery / completion requirements.

6 Section 6 - Using existing framework arrangements

6.1 In accordance with the Academies Financial Handbook and DfE policy, wherever possible, the Trust should avoid running its own procurement processes and instead use an existing framework arrangement.

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6.2 From time to time, the Trust may also set up its own framework agreements which can be used by all Academies. Such frameworks will be notified to Academies from time to time.

6.3 Examples of existing frameworks include those set up by Crown Commercial Services, Eastern Shires Purchasing Organisation and Yorkshire Purchasing Organisation and cover a wide range of areas.

6.4 In each case, it is important that:

6.4.1 the Trust is entitled to call off from the arrangement. You should check in each case;

6.4.2 the specification and the contract terms are suitable for your 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; and

6.4.3 you must follow the framework's guidance, particularly about how orders should be placed.

7 Section 7 - Extending or varying existing contracts

7.1 You may be considering extending an existing contract or using an existing Trust contract for your spend. You must contact the Director of Finance or the Procurement team agreeing to any such extension or variation.

8 Section 8 - Making the purchase

8.1 Different rules apply depending on the value of the purchase you want to make. The Trust's current spend thresholds are set out below.

8.2 If your contract is of a value which exceeds the Upper Threshold, the Regulations will apply and you must follow the procedure set out in section 15 of this Policy.

Value of spend - which rules apply?

Up to £10,000 - Low Value (follow the rules at section 12)

£10,000 to £50,000 - Medium Value (follow the rules at section 13)

£50,000 to £189,330 - High Value (follow the rules at section 14)

Over £189,330, - Upper Threshold (follow the rules at section 15) including over EU threshold (see Appendix 2)

8.3 Refer to WHMAT delegated authority limits & thresholds (Appendix 3)

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9 Section 9 - Valuing your contract

9.1 It is important that contracts are properly assessed for value. In particular, you must not deliberately divide one contract into smaller contracts with the effect of avoiding the procurement rules.

9.2 The contract value is based on the total value of the spend which is the subject of the procurement. All Academies' needs should be combined into one procurement if they are the same or similar; this is why the Trust will oversee procurement.

9.3 If you do not know what your exact spend is going to be over the life of the contract, you should take an average annual spend and multiply by the estimated duration of the contract. The estimated duration of the contract must include any extensions or options to renew.

9.4 In the case of service contracts which are regular in nature or intended to be renewed, the value is either:

- (i) The total actual value of the successive contracts over the last 12 months (or financial year, if longer), adjusted to take account of likely changes in quantity over the following 12 months; or
- (ii) The total estimated value of the successive contracts over the 12 months (or financial year, if longer) from the first delivery.

9.5 In the case of service contracts which do not indicate a total price:

- (i) If the service contract has a fixed-term of less than or equal to 48 months, the value is the total value for the full term.
- (ii) If the service contract has no fixed-term or a term greater than 48 months, the value is calculated by multiplying the amount it is expected will be paid each month by 48.

9.6 You should check with the Director of Finance or Procurement if you are unsure about how to calculate contract value.

9.7 For the purpose of calculating contract values, all amounts should be taken as net of VAT, where applicable.

10 Section 10 – Charge cards

10.1 Trust charge cards should only be used for low value, one-off spends which cannot be procured through an alternative means. Charge cards are not a suitable method to procure repeat items or higher value goods.

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10.2 The maximum spend for any one item on a Trust charge card without prior permission from the Finance Director is £500 [excluding VAT] and full receipts must be submitted in respect of any charge card purchase. The only exception to this rule is for educational visits. Any other exceptions require approval by the Director of Finance; justification must be provided.

- Please refer to the Trust charge card policy.

11 Section 11 - Sustainability

11.1 The Trust is committed to ensuring sustainability in its contracts and will include relevant sustainability criteria in its contracts. You should check with the Director of Finance or Procurement if you are unsure.

12 Section 12 - Low Value transactions

12.1 For all transactions with a total value of less than or equal to £10,000 exclusive of VAT, competitive quotes are not needed but a cost price must be obtained from the supplier(s) before a purchase order can be issued. The terms and conditions of the purchase will often be found on the purchase order. You should read these carefully before signing.

13 Section 13 - Medium Value transactions

13.1 For Medium Value Transactions, you must produce a short business case for the spend. Where the cost is lower than £20,000 the reason for the purchase may be discussed verbally with the Academy's Principal (or with the Director of Finance if central spend). Short written reports are required where the order falls between £20,000 and £50,000. These reports should be attached to the final purchase order on Access Education Finance.

13.2 The business case will be considered by the Principal of the Academy (or Director of Finance, as the case may be) and must include as a minimum:

13.2.1 The estimated impact on pupil outcomes where it is a curriculum spend;

13.2.2 Where the expense relates to administration costs evidence that the Academy is required to incur such costs and attempts to minimise the expenditure has been considered;

13.2.3 Confirmation there is sufficient budget remaining to enable the transaction to proceed and there will not be any detriment on potential future expenditure;

13.2.4 Details of the suppliers to be approached and the reason for their selection.

13.3 There are two approaches for medium value transactions:

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13.3.1 Lowest price only - at least three written quotations must be obtained before a purchase order or contract is issued. You must provide a specification of the purchase in advance which must include as a minimum:

- (a) a statement that the Trust or Academy will buy the lowest priced only item;
- (b) a description of the requirement;
- (c) the quantity needed;
- (d) the timescale for the provision or completion; and
- (e) the deadline for submission of the quotation.

13.3.2 Price and quality - at least three written quotations must be obtained before a purchase order or contract is issued. You must provide a specification of the purchase in advance which must include as a minimum:

- (a) a statement setting out what the Trust or Academy wants to achieve from the purchase;
- (b) the evaluation criteria which will be used to evaluate the quotations received, including disclosure of the criteria, sub criteria and weightings that will be applied to select the best bidder(s). This is a complex area and you should check with the Director of Finance or Procurement if you are unsure;
- (c) a description of the requirement;
- (d) the quantity needed;
- (e) the timescale for provision or completion; and
- (f) a draft set of terms and conditions. The supplier may provide a draft contract and you should check with the Director of Finance if you are unsure about particular contract terms.

14 Section 14 - High Value transactions

14.1 Prior to undertaking any High Value transaction, you must produce a business case for the spend.

14.2 The business case will be considered by the Director of Finance or a person nominated by that post holder and must include the following as a minimum:

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14.2.1 The estimated impact on pupil outcomes where it is a curriculum spend, with reference to the Academy Development Plan;

14.2.2 Where the expense relates to administration costs evidence that the Academy is required to incur such costs and attempts to minimise the expenditure has been considered;

14.2.3 Confirmation the expense was included as part of the budget prepared at the start of the academic year and that there is sufficient budget remaining to enable the transaction to proceed and there will not be any detriment on potential future expenditure;

14.2.4 Notes on discussions held with the Finance Director to confirm the purchase of the goods or services will not result in any cash flow issues.

14.2.5 Details of the suppliers to be approached and the reason for their selection.

14.3 An advertisement must be placed to seek expressions of interest from interested bidders. The decision about where to advertise must be taken on a case-by-case basis and should be proportionate and reasonable – see the next paragraph (14.4) for more information.

14.4 Please note that although contracts which are not “Upper Threshold” are not caught by the fully public procurement regime (see section 15 below), such contracts are subject to the principles of the Treaty on the Functioning of the European Union which are as follows:

- (1) Equal Treatment;
- (2) Proportionality;
- (3) Mutual Recognition;
- (4) Non-discrimination; and
- (5) Transparency.

What these principles require in practice is that the contract has to be “adequately” advertised and some form of fair competition run thereafter. The scope and nature of the advertisement will depend on the nature of the contract, the value of it, and who is or is likely to be interested in it, including where it is to be carried out. The European Commission has provided some guidance on this issue which includes methods such as advertising a contract on the Trust’s website or on other portals designed for that purpose, or in the national press. Local advertising would usually only be appropriate for contracts which are very local in nature. As an Academy trust, the Trust is exempt from the obligation to advertise all such contracts on Contracts Finder.

The appropriate advertising medium depends on the likely level of interest in the procurement. The more interest that there is likely to be and the greater the value of the contract, the wider the coverage must be.

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14.5 Bidders must be allowed suitable time to respond to the advertisement. This should be clearly set out together with any submission requirements.

14.6 Bidders requesting more information should be sent a tender pack. This should contain the information about the requirement and needs, together with the information required from bidders. This will need to be bespoke in each case but could include, for example:

14.6.1 details of pricing;

14.6.2 details of method statements;

14.6.3 details of product characteristics;

14.6.4 the evaluation criteria which will be used to evaluate the tenders received, including disclosure of the criteria, sub criteria and weightings that will be applied to select the best bidder(s). This is a complex area and you should check with the Director of Finance or Procurement if you are unsure; and

14.6.5 a draft set of terms and conditions.

15 Section 15 - Upper Threshold

15.1 The Regulations must be followed whenever the total value of the contract exceeds the Upper Threshold. This is a complex area and you should agree with the Director of Finance whether any legal and/or financial support is required with the process. Under no circumstances should an Upper Threshold Contract be entered into without prior approval.

Fully Regulated Upper Threshold contracts

15.2 No Upper Threshold contract should be awarded without approval from the Director of Finance. The key points to remember are:

15.2.1 an advertisement will need to be published on the Official Journal of the European Union (OJEU) to notify the market of the contract opportunity. The contract must also be advertised on Contracts Finder or TED (Tenders Electronic Daily) once it has been published in the OJEU. Other adverts (for example, on the Trust's or Academy's website) must not appear before the OJEU notice and must be consistent with it;

15.2.2 there are legal minimum timescales to allow bidders to request information about a procurement process and to complete each stage. It is important that these timescales are followed.

15.2.3 bidders are entitled to understand all of the evaluation criteria, sub criteria and weightings to be used in the procurement process. Once any such criteria are set, they should not be changed;

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15.2.4 bidders are entitled to certain information when they are excluded from a process;

15.2.5 a minimum cooling off period of 10 calendar days must be left between notifying all bidders of the outcome of the procurement and entering into the contract ("mandatory standstill period".) Certain information about the procurement must be provided with the notification to bidders and you should liaise with the Director of Finance to ensure compliance with this important requirement; and

15.2.6 a contract award notice must be published on the OJEU within 30 calendar days of the award of the contract.

15.3 There are a choice of procurement routes available and limited circumstances where a contract can be awarded directly. The Trust should use electronic procurement techniques wherever possible. This is a complex area and you should discuss with the Director of Finance before any decisions are taken.

"Light touch" Services

15.4 Certain services contracts (including education services and catering services) are subject to a slightly different (more light touch) regime. The common services which are "light touch" are listed in Appendix 2.

15.5 Above the relevant threshold, which is higher for "light touch" services (see the thresholds in Appendix 2), certain obligations apply but these are less prescribed than for other types of services. An advert must be placed on OJEU and, following award, a contract notice.

15.6 Beyond those requirements, the Trust is free to determine the procedures applicable to award, but these must be sufficient to ensure transparency and equal treatment. Time limits should be reasonable and proportionate. In practice, this may mean sometimes deciding to comply with the full prescribed process as if they did apply.

Contracts not caught by the Regulations

15.7 Some contracts, regardless of their value, are not subject to the Regulations. This includes, for example, employment contracts.

15.8 Some types of arrangements may be covered by other rules, for example, if the arrangement is a contract where the income is being collected directly by the provider. This is known as a "concession" contract.

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15.9 This is a complex area and you should check with the Director of Finance or the Director of Finance and Procurement if you are unsure.

16 Section 16 - Rules on opening tenders

16.1 Every quotation for a Medium Value, High Value or Upper Threshold procurement may be:

16.1.1 provided in hard copy, on memory stick or via email

16.2 The Trust or Academy must keep tenders secure until the time specified for all tenders to be opened. Email tenders should be stored in a secure site.

16.3 All tenders submitted should be opened at the same time and the tender details should be recorded. A minimum of three persons should be present for the opening of tenders being the Director of Finance (or that post holder's representative), the Principal (or the appropriate Head of Service if the tender relates to the central budget) and a representative from the central finance team. All such expenditure must be approved by the Trust's finance committee.

16.4 A separate record should be established to record the names of the firms submitting tenders and the amount tendered. This record must be signed by all those present at the tender opening.

17 Section 17 - Tender evaluation and contract award

17.1 For Low Value or Medium Value (Lowest Price) tenders, where written quotations are received, the bidder offering the lowest price must be awarded the contract.

17.2 For Medium Value (Price and Quality), High Value and Upper Threshold procurements, a more complex assessment of the mix of price factors and non-price factors should be taken into account.

17.3 The evaluation approach requires the use of evaluation criteria which:

17.3.1 are pre-determined and listed in the invitation to tender;

17.3.2 are strictly followed at all stages through the process;

17.3.3 include price;

17.3.4 are relevant and proportionate to the subject matter of the contract;

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17.3.5 are capable of objective assessment;

17.3.6 are weighted in accordance with the relative importance and weighting of the tenders; and avoid discrimination on the basis of the bidder's nationality or other discriminatory measure.

17.3.7 Where the approach set out in 17.3 above is used, any contract must be awarded to the bidder which achieves the highest score in the objective evaluation.

18 Section 18 - Audit Trail

18.1 The Trust's Accounting Officer must include a DfE value for money statement within the annual statutory accounts.

18.2 A clear audit trail should be kept for all purchases. The level of detail required will increase with the value of the procurement. The written record should include:

18.2.1 who was responsible for making the decision to procure, and details of their decision making process;

18.2.2 full minutes of any meetings at which the procurement was discussed;

18.2.3 who was responsible for evaluation of tenders, and details of the evaluation, if applicable

18.2.4 who was responsible for receiving and checking the goods or services and for authorising and making payment. Note that in all cases the person responsible for the decision to procure must not be the same person who authorises payment;

18.2.5 details of the dialogue or negotiation stage, and the selection process;

18.2.6 details of the purchase itself, for example, what was purchased, from whom and for what price; and

18.2.7 be available to Head Office at all times for audit purposes.

18.3 For Upper Threshold procurements (except for framework agreement call offs) a written report should be kept as the procurement is undertaken. As a minimum, this should include:

18.3.1 the name and address of the Trust, the subject-matter and value of the contract;

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18.3.2 where relevant, details as to how bidders have been shortlisted or selected to tender, including: the successful and unsuccessful bidder names; the reasons for the deselection/selection and whether any tender was found to be abnormally low;

18.3.3 the name of the successful tenderer and the reasons why its tender was selected;

18.3.4 the share (if any) of the contract or framework agreement which the successful tenderer intends to subcontract to third parties, and the names of the main contractor's subcontractors (if any);

18.3.5 the justification for using a particular procurement procedure (where needed);

18.3.6 where applicable, the reasons why the Trust decided not to award a contract;

18.3.7 where applicable, the reasons why means of communication other than electronic means have been used for the submission of tenders; and,

18.3.8 where applicable, if conflicts of interests were detected and the subsequent measures taken.

19 Section 19 - Documentation

19.1 The Trust must document the progress of all Upper Threshold procurement procedures. The Trust is obliged to ensure that it keeps sufficient documentation to justify decisions taken in all stages of the procurement procedure. In each case, the written record should include copies of all original documentation used during the procurement such as tender packs, quotes, contracts and invoices. The written record shall be kept for a period of at least 3 years from the date of award of the contract.

20 Dealing with conflicts of interest

20.1 The Academies Financial Handbook puts strict obligations on the Trust to ensure that conflicts of interest in procurement are managed.

20.2 Any interest which may affect the outcome of a procurement process must be declared. This includes all Members, Trustees, governors as well as members of the Academy's senior leadership team and budget holders.

20.3 All Members, Trustees, Governors, members of the Academy's senior leadership team and all budget holders must complete the register of business interests and keep this updated at least once per year. You should speak to the Trust's Governor Services Team if you are unsure.

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20.4 There are rules in the Academies Financial Handbook in relation to payments to individuals/organisations which are "connected" to a member or trustee. In any such case the Director of Finance must be informed before such expenditure is incurred.

20.5 A record of all such declared conflicts of interest must be sent to the Director of Finance without delay who will determine what if any action can be taken to seek to remedy any such conflict of interest.

20.6 A record must be signed by all those present at the tender opening which confirms that they held no pecuniary interests with any firms tendering.

20.7 No gifts or hospitality should be accepted by any service provider as an inducement to award a contract to that supplier. This may be an offence under the provisions of the Bribery Act 2010. This includes free IT equipment. You must inform the Director of Finance immediately on becoming aware of any such gifts or hospitality. Staff must make themselves aware of the Trust's gifts and hospitality policy and ensure it is complied with at all times.

20.8 Washwood Heath Multi Academy Trust is required to comply with the UK Modern Slavery Act 2015. Service providers should provide positive confirmation that to the best of their knowledge slavery and human trafficking is not occurring in their own institution or in any of their supply chain.

21 Further information

21.1 You should always check with the Director of Finance or Procurement if you are unsure about how this Policy may apply to you.

21.2 Staff should be aware of the requirements of the Trust's Financial Procedures, particularly those parts relating to the procurement of goods and services.

21.3 This Policy will be reviewed at least annually by the Trust. Any changes will be communicated to all staff at the Trust and the Academies.

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Appendix 1 Authorised Staff

The Trust's Financial Procedures set out in detail the persons responsible for placing purchase orders. In summary, all purchase orders are approved by a budget holder before being checked and where appropriate amended by the Procurement team prior to issuing to the supplier. No order should be placed with a supplier until this process has been completed in full.

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Appendix 2

EU thresholds, procedures and timescales and services

Tender thresholds in force at time of writing

Supplies	Services	“Light Touch”	Works contracts
£189,330	£189,330	£663,540	£4,733,252

Thresholds are net of VAT and are updated every two years. Where thresholds are updated Academies will be formally notified by the Director of Finance. That notification will supersede the values included in this policy.

Tender procedures and periods under the Regulations

<u>Procedure</u>	<u>Pre qualification required</u>	<u>Tendering period</u>
Open	NA	35 days
Restricted	30 days	30 days
Competitive dialogue	30 days	Not specified
Competitive with negotiation	30 days	Not specified
Innovation partnership	30 days	Not specified

Note that, for open and restricted procedures, a 5 day reduction in the tendering period is permitted where tenders are submitted electronically.

Note also that the above does not cover the compulsory 10 day standstill period.

Examples of common “Light touch” services

- Legal services
- Education and training services
- Health and social services
- Catering and school meal services

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An Upper Threshold light touch services contract will require an advertisement across Europe. Below the threshold, this policy should be followed together with any DfE/Government guidance.

Appendix 3

WHMAT Delegated Authority Limits and Thresholds.

Contract Limits

- | | |
|------------------|---------------------------------------|
| • £100K and over | Board of Trustees |
| • Up to £100K | Finance Committee* |
| • Up to £40K | Chief Executive Officer (CEO) |
| • Up to £25K | Deputy Chief Executive Officer (DCEO) |
| • Up to £25K | Finance Director |
| • Up to £10K | Strategic Director |
| • Up to £10K | Head of Academy/Head of School |

Budget Virement Limits

- | | |
|------------------|---------------------------------------|
| • £100K and over | Board of Trustees |
| • Up to £100K | Finance Committee |
| • Up to £50K | Chief Executive Officer (CEO) |
| • Up to £25K | Deputy Chief Executive Officer (DCEO) |
| • Up to £25K | Finance Director |
| • Up to £10K | Strategic Director |
| • Up to £10K | Head of Academy/Head of School |

Write offs/Disposals

- | | |
|----------------|--|
| • Up to £500 | Head of Academy/Head of School |
| • Up to £500 | Strategic Director |
| • Up to £1K | Finance Director/Head of Trust Finance |
| • £1K and over | Chief Executive Officer (CEO) |

Purchase Order Approval

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|-----------------|-----------------------|
| • Up to £5K | Budget Holder |
| • Up to £10K | Strategic Director |
| • Up to £25K | Head of Trust Finance |
| • £25K and over | Finance Director |

*In Exceptional circumstances, the chair of the board may exercise the same financial authority as the Finance Committee via a chairs action.