

PROCUREMENT POLICY

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1. POLICY STATEMENT

- a. City Learning Trust is committed to providing a high-quality, inclusive, and comprehensive education that meets the needs of all students, promotes their personal and academic growth, and prepares them for future success.
- b. The purpose of this policy is to outline the process and procedure City Learning Trust (The Trust) will follow to procure resources and services in order to achieve value for money whilst ensuring compliance with the Procurement Act 2023, the DfE funding agreement and the Academy Trust Handbook.

2. PROCESS FOR COMPLIANCE AND IMPLEMENTATION

- a. This policy applies to all procurement including staff expenses regardless of the source of the funds.

2.1 Procurement Procedure

- a. The Trust follow 3 main procurement procedures as demonstrated in the procurement flowchart (Appendix A):
 - i. Single quotations for orders less than £10,000 (exclusive of VAT)
 - ii. Three written quotations for orders between £10,000.01 - £75,000 (exclusive of VAT)
 - iii. Formal tender for orders Over £50,000.01 (exclusive of VAT)

2.2 Orders under £10,000

- a. A singular quote or evidence of one suppliers pricing must be obtained and approved in accordance with the Scheme of Delegation (Appendix B) before a purchase order can be issued.
- b. Competitive quotes are not required but the order request should demonstrate value for money
- c. Orders cannot be broken down in to several smaller requests to circumvent/avoid requirements for purchases over £10,000.

2.4 Orders Between £10,000.01 - £75,000

- a. A minimum of 3 written quotations must be obtained and the best value option put forward for approval in accordance with the Scheme of Delegation (Appendix B) before a purchase order can be issued
- b. Quotations must be like for like quotations
- c. A copy of all quotes obtained must be submitted with the purchase requests and kept on file by the central finance team to evidence that the process has been followed.

2.5 Orders Over £75,000.01

- a. A full tender process is required at this level of expenditure. Tendering processes will be overseen by the central finance team
- b. Invitation to tender packs must be openly advertised/issued to a minimum of 5 suppliers unless they are above the Find a Tender thresholds
- c. Invitation to tender packs must contain:
 - i. Instructions to the Tenderers
 - ii. Specifications
 - iii. Tender evaluation criteria including sustainability and corporate social responsibility (CSR) Appendix C
 - iv. Timescales
- d. Suppliers must be given a minimum of 2 weeks to respond
- e. Submissions must only be opened at the agreed time and be evaluated by a minimum of 2 people
- f. The scoring of submissions against the evaluation criteria must be recorded in writing and retained in the procurement file by the central finance team
- g. Contracts must be awarded to the most advantageous tender
- h. Where tenders are above the Procurement Act 2023 and Find a Tender thresholds listed on the [Procurement Policy Note 11/23](#) the Find a Tender process must be followed. This currently includes:
 - i. Pre-market engagement to test suitability of the tender
 - ii. Advertisement on Central procurement platform by way of a formal contract notice
 - iii. Planned procurement above the Procurement Act 2023 thresholds must be published on Central procurement platform in advance of the tender going live. This will give prospective contractors the opportunity to plan ahead for bid writing.

- iv. Adherence to the prescribed tender timelines
- v. Mandatory use of a suitable e-tendering platform
- vi. Standstill period
- vii. Provision of a full debrief to all bidders
- viii. Issue of a formal Contract Award Notice to FTS
- i. Before a contract can be awarded approval must be obtained in accordance with the delegated authority framework (Appendix B)
- j. Copies of the invitation to tender, responses and written evaluation will be retained by the central finance team

2.6 Frameworks and Dynamic Purchasing Systems (DPS)

- a. Frameworks and dynamic purchasing systems can be used at all levels of expenditure.
- b. In many cases it can be better value to procure via frameworks or DPS as the suppliers have already been vetted and the terms and conditions are likely to be favourable to the Trust.
- c. Where appropriate the Trust may procure using suitable pre-existing frameworks i.e. Crown Commercial Service (CCS), Yorkshire Purchasing Organisation (YPO), Crescent Purchasing Consortium or Schools Buying Club.
- d. Procurement via this route is not permitted without authorisation and acknowledgement by central finance team .

2.7 Staff Expenses and Petty Cash

- a. Where possible all procurement should be carried out via the procedures listed above however in circumstances where this is not suitable, staff are able to purchase goods/ services themselves and claim back using the staff expenses on the Access People portal or via Petty Cash.
- b. Before purchasing items which you intend to claim back via expenses prior written approval must be obtained in accordance with the Scheme of Delegation (Appendix B).
- c. Claims must be made within three months of date that the claimable expenditure was incurred
- d. If submitting an expense claim, employees should submit their expenses for approval on the portal (Appendix C). Once submitted the expenses will be automatically sent to the appropriate approver within the system. Claims will be paid via the next available payroll following approval.
- e. If submitting a petty cash claim, employees should complete the appropriate petty cash form and obtain authorisation from the appropriate approver before submitting the form to the central finance team. Claims will be paid via BACs within 2 working days of the central finance team receiving an approved claim form.
- f. It is the responsibility of the claimant to ensure the amounts claimed are justifiable and represent value for money.
- g. Receipts and written prior approval must be attached for all claims. Credit card slips or bank statements will not be accepted as evidence of the expenditure
- h. Claims for mileage and subsistence can only be made via expenses.

2.8 Procurement Dispensation

- a. In limited circumstances an exemption (dispensation) may be granted when the procurement procedures laid out in the policy cannot be followed
- b. A dispensation may be granted for one of the following reasons:
 - i. Unforeseen emergency
 - ii. Good/ services are only available from one source and there is no other way to meet the Trust's requirements
 - iii. An extension is required to a current contract in order to allow sufficient time to complete a competitive tendering exercise
 - iv. Where seeking of tenders and subsequent contract award could cause significant operational difficulties and where any potential savings may be outweighed by those operational issues.
- c. All dispensations must be compliant with the procurement legislation
- d. Dispensations must not be used to simply avoid competitive tendering
- e. All dispensations must be requested using a dispensation form, approved in accordance with the delegated authority framework and reported to the Board of Trustees.

2.9 Contract Approval

- a. All contracts must be signed in accordance with the Scheme of delegation
- b. By signing a contract, the Trust is agreeing to the Terms and Conditions set out in the contract
- c. Failure to comply with policy may result in breach of legislation and/or claims for damages/reputational damage.

2.10 Contract Register

- a. A register of all contract held by the Trust will be kept centrally by the central finance team.
- b. Contracts will be monitored for compliance and to ensure that they deliver the value intended. This will be done through agreed KPIs set out during the procurement process.
- c. Where contracts are coming to an end the central finance team will liaise with the contract owner to serve notice in the timescales set out within the contract and/ or arrange for re-tendering for the service/goods

2.11 Bribery, Fraud and Corruption

- a. Procurement is a high-risk area for potential bribery, fraud and corruption
- b. All employees should be aware of the Bribery Act 2010. The obligations under this act are listed within the Finance Policy. All employees must familiarise themselves with the policy to ensure compliance at all times
- c. All reasonable steps to identify conflicts of interests must be taken

3. RESPONSIBILITIES

3.1 Board of Trustees

- a. Policy Review: Review and approve the procurement policy ensuring it remains relevant and effective.
- b. Authorising of contracts, orders and payments within agreed approval limits

3.2 Chief Executive Officer (CEO)

- a. The Chief Executive Officer (CEO) is the Accounting Officer (AO) with responsibility to Parliament and the ESFA for the propriety and regularity of the public finances for which they are accountable.
- b. Authorising of contracts, orders and dispensation forms within agreed approval limits
- c. Review of procurement plans and schemes of work for projects
- d. Ensure compliance with the Scheme of Delegation
- e. Ensure regularity and propriety of value for money practices

3.3 Chief Finance Officer (CFO)

- a. Management of the day-to-day procurement responsibilities of the trust
- b. Initial review of procurement plans and schemes of work for projects
- c. Authorising of contracts, orders and dispensation forms within agreed approval limits
- d. Ensure regularity and propriety of value for money practices
- e. Ensure compliance with the scheme of delegation

3.4 Finance Director

- a. Management of the day-to-day procurement responsibilities of the trust at an operational level
- b. Ensure compliance to the scheme of delegation
- c. Ensure internal controls to prevent and detect fraud are in place
- d. Ensure regularity and propriety of value for money practices
- e. Support colleagues with procurement processes
- f. Oversee procurement using DPS
- g. Lead on all tenders
- h. Make recommendations for approval on tenders/ contracts
- i. Prepare procurement plans for projects

3.5 All Staff Members

- a. Ensure economy and efficiency in the procurement of Trust resources
- b. Complete purchase request forms attaching required evidence
- c. Obtain correct approval for purchase requests
- d. Understand the procedures on accepting gifts and hospitality
- d. Declare conflicts of interest

4. DOCUMENT INFORMATION

KEY INFORMATION		ASSOCIATED DOCUMENTS	
Contact Name:	Finance Director	Whistleblowing Policy	
Date Effective:	September 2025		
Version:	V2.6		
Frequency:	Annual		
Next Date:	September 2026		
REVIEW BODY		DISTRIBUTION	
Name:	Compliance Director	Name:	All academies
Date:	September 2026	Date:	September 2026
		Websites:	n/r
		Sharepoint (pdf):	
VERSION HISTORY		APPROVAL	
Version:	Date:	Change:	
V0.1	April 2020	New Document	
V1.0	September 2020	Annual review	Corporate format only
V2.0	June 2022	Annual review	Re-wrte of policy
V2.1	June 2022	Update from FAR Comm.	Section 8 added - CSR
V2.2	November 2022	Interim Review	Section 9.c - threshold amounts updated Section 12.b.i , 12.b.ii and 12.b.iii - value updated Section 24.a & b - values updated.
V2.3	May 2023	Annual Review	Date changes only
V2.4	September 2024	Annual Review	Re-write of policy
V2.5	March 2025	Interim Update	Updated in line with Procurement Act 2023 Section 2.3, 2.4 & 2.5 - amounts Section 2.5.g added and h updated Section 2.10.b and 2.11.c updated Section 3.5.d added
V2.5	September 2025	Annual review	Section 2.5.c.iii – CSR included in tender evaluation criteria (Appendix C) Appendix C added for CSR

APPENDIX A

- a. The City Learning Trust aims to be an honest and ethical organisation. As such it is opposed to fraud and seeks to eliminate fraud by creating a culture which deters fraudulent activity, encourages its prevention and promotes detection and reporting.

Definitions

Fraud

- a. Fraud is intentional deceit covering theft, deliberate misuse or misappropriation of assets or resources.
- b. Fraud incorporates theft, embezzlement, forgery, corrupt practices and falsification of accounts

Corruption

- a. Corruption or corrupt practices is defined as the offering, giving, soliciting or acceptance of a reward which may influence the actions taken by the Trust, its staff or Trustees.

Gifts and Hospitality

- a. Any gifts, rewards and benefits that are disproportionately generous or that could be seen as an inducement to affect a business decision should be declared.

Theft

- a. The dishonest taking of property belonging to another person/entity with the intention of depriving the owner permanently of its possession

Examples

- a. Theft of cash
- b. Non-receipting of income
- c. Expense claims for non-existent journeys/purchases
- d. Inflated mileage claims
- e. Manipulation of payroll documents i.e. false overtime claims
- f. Unauthorised borrowing of Trust equipment
- g. Failure to declare pecuniary interests
- h. Concealing generous gifts/rewards
- i. Creation of false documents i.e. supplier invoices
- j. Unfairly influencing the award of a contract
- k. Using position for personal reward

Gifts and Hospitality

- a. These guidelines set out the gifts and levels of hospitality which are acceptable.
- b. To accept gifts should be the exception. You may accept a small thank you gift of token value such as a diary, mug or flowers not over £50 in value from an individual or company. Any gifts over this value must be recorded on the Gifts and Hospitality register which is held by the HR department.
- c. Always decline the gift/hospitality if you believe that the giver has an ulterior motive
- d. Never accept a gift/hospitality from anyone who is or maybe tendering for any contract with the Trust, seeking employment with the Trust or is dispute with the Trust, even if you are not directly involved in the process.
- e. Where items purchased include a free gift these must be used for Trust business or donated to charity
- f. If you are in any doubt about the acceptance of gifts or hospitality it is your responsibility to consult the HR Director or Finance Director in advance.

Examples of acceptable hospitality

- a. Occasional working lunches with customers/partners.
- b. Invitations to represent the Trust at corporate hospitality events i.e. cultural/sport event/celebrations. Consideration must be given to the public perception of these events before accepting the invitation. Where spouses are invited to attend the cost for the spouse must be met personally.
- c. Acceptance of refreshments when visiting other academy trusts/customers/suppliers
- d. Acceptance of hospitality provided at conferences/seminars related to your work

Reporting Suspected Fraud or Corruption

- a. All allegations of suspected fraud and corruption must be reported the Academy Lead or CEO without delay. Please refer to the whistleblowing policy for further guidance.
- b. Response to Allegations
- c. The Academy Lead will co-ordinate the initial response and will liaise with the HR Director and Finance Director.

APPENDIX B

Procurement Flowchart

<C:\Users\VictoriaLeon\OneDrive - City Learning Trust\Desktop\Procurement Process Flowchart.pdf>

APPENDIX C

Corporate Social Responsibility (CSR)

- a. City Learning Trust will take into account the economic, social and environmental impact in everything we do. All member schools, academies and colleges, and our Trust employees are dedicated to being highly responsible citizens. We have adopted the 'United Nations' 17 Sustainable Development Goals to transform our world' and so commit to mobilising efforts within our own organisation, the City Learning Trust, to achieve the Sustainable Development agenda by 2030.
- b. We recognise the importance of integrating our business values and operations, with our educational values to meet the expectations of our stakeholders. They include our employees, our children and young people, Trust suppliers and partners and the communities in which we operate.
- c. Our social, economic and environmental responsibilities to these stakeholders are essential. We aim to demonstrate these responsibilities through our coordinated activities, all of which are linked into the sustainable development goals, and within our corporate policies. We aspire to balance the interests of all our stakeholders so that our reputation is associated with positive and innovative ideas and actions.
- d. City Learning Trust will, through the Executive Leadership Group working with the Trust Board, make the necessary resources available to realise our corporate responsibilities. The responsibility for our performance on this policy rests with all employees throughout the Trust.

Our Business and Operations

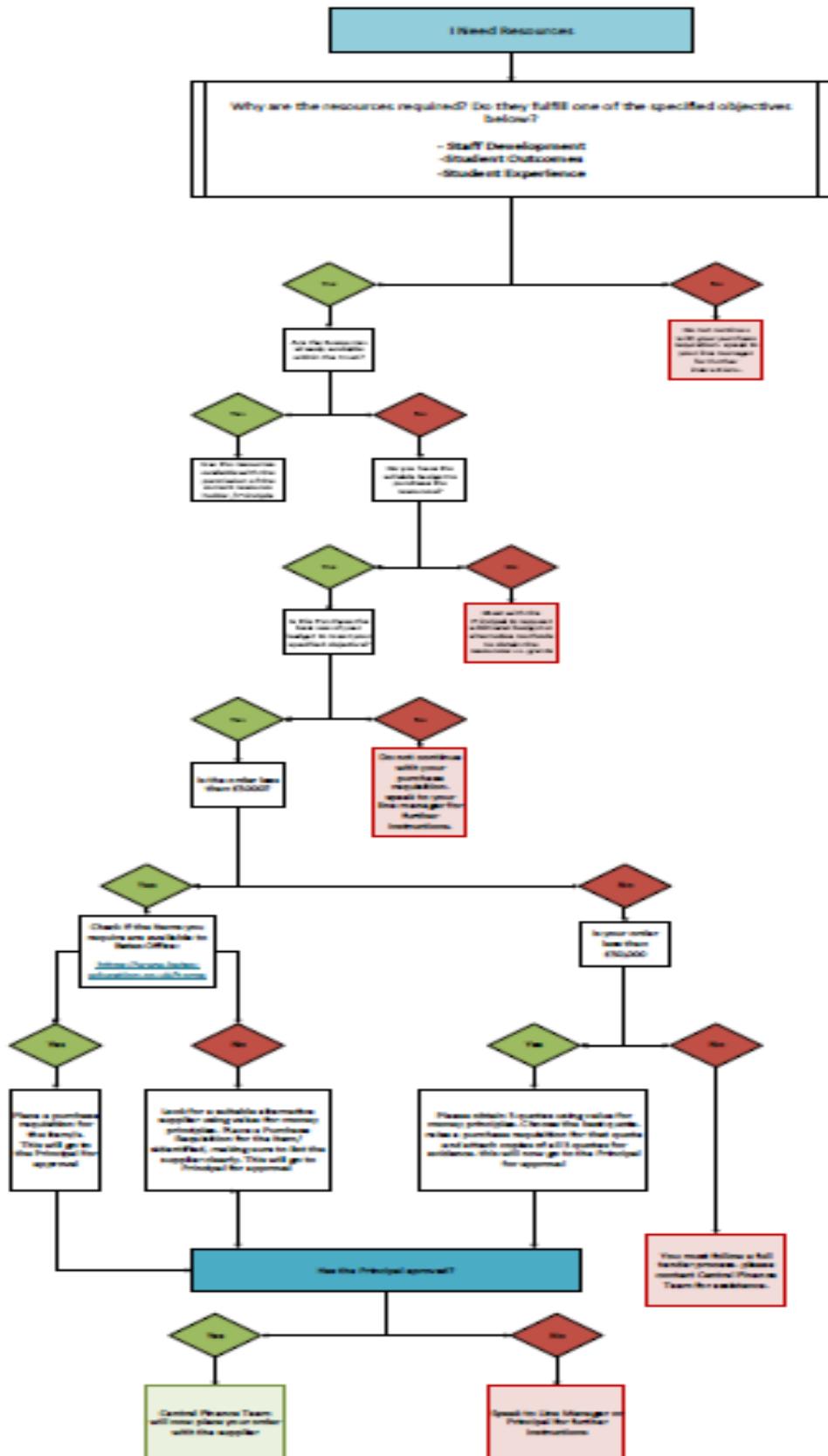
- a. We will work with our business partners and suppliers to maximise the positive impact that we can have on the communities that we serve. We are committed to achieving this through:
 - i. Establishing Corporate Social Responsibility (CSR) as an intrinsic element within our procurement process. The social values exhibited by potential suppliers will form part of our procurement decision-making process when selecting contractors;
 - ii. Where possible, working with locally based companies that are employing local people, are impacting positively on the communities that we serve across the Trust and that show clear commitment to sustainability and the sustainable development goals;
 - iii. Encouraging our suppliers and business partners to review their own approaches towards CSR and actively seek to work with them on suitable CSR approaches and initiatives for mutual benefit;
 - iv. Engaging with business networks, and partner organisations, that share our CSR philosophy and work with them on appropriate programmes aligned to our CSR values;
 - v. Committing to sustainability in our business and operational activities, and across the Trust we will investigate opportunities for good practice with regard to sustainability. Where possible we will use the United Nations Sustainable Development Goals framework to guide our actions and seek to:
 - Help all City Learning Trust employees and students to understand their own impact upon the environment and how they can support sustainability.
 - Reduce our carbon emissions (and increase carbon offsetting – e.g. through tree planting; solar schools; bio-diversity and conservation).
 - Reduce energy consumption across the Trust.
 - Reduce waste production by 'Reducing, Reusing and Recycling'.
 - Reduce emissions from transportation.
 - Procure goods with consideration of the long-term lifecycle costs and benefits, as well as the suppliers' "green" credentials.
 - Prioritise sustainably sourced goods and food items.
 - Manage our water usage effectively.
 - Improve our urban landscapes.
 - Include "green" designs in the development of new capital works programmes.

Our Communities and Social Justice

- a. Mindful of Sustainable Development Goal 17 we will promote partnership and collaboration for the goals. We will work with voluntary organisations, charities, community groups, community interest companies, and not-for-profit businesses to maximise the positive impact that we can have on the communities that we serve. We are committed to achieving this through:

United by our values, we place children and young people first in everything we do

- i. Seeking out opportunities to work with local 3rd sector organisations that are striving to make a difference in our local communities;
- ii. Making time and resources available to participate on steering groups and project groups, actively participating in 3rd sector initiatives, including the participation of employees, students and other stakeholders, as far as is reasonably practicable;
- iii. Initiating, leading on, and supporting innovative projects, in tandem with 3rd sector partners, that will make a positive difference, will contribute to sustainability and improve social mobility of our wider stakeholders, helping people to overcome barriers, gain in confidence and develop new skills and abilities;
- iv. Facilitating contact between 3rd sector organisations and our business partners and suppliers, enabling them to work together effectively, for their mutual benefit.



APPENDIX D

Delegated Authority Framework

<https://citylearningtrust.org/wp-content/uploads/2024/04/Scheme-of-Delegation-23-24.pdf>

APPENDIX E

Claimable Expenses

Modes of Travel

- a. The use of public transport is encouraged and should be used where possible and most cost effective
- b. Staff are responsible for the cost of all travel between their home and their place of work as set out in their contract.
- c. Mileage rates for the relevant mode of transport are paid at the rate of 0.25 pence per mile.
- d. All drivers must note that any parking, road traffic, congestion fines or penalties incurred are their own personal responsibility and will not be reimbursed by the Trust
- e. Drivers will be reimbursed for the congestion and toll charges incurred subject to the production of receipts, where available. Congestion charges will only be reimbursed at the daily rate, so the driver must ensure that they are paid before the deadline.
- f. When travelling by taxi, a receipt must be obtained from the driver. Where possible, the claimant should obtain prior travel approval from an appropriate line manager before using a taxi. Travel by taxi should be kept to a minimum and normally only under the following circumstances:
 - i. Where heavy baggage or equipment is being transported;
 - ii. Where no public transport is available;
 - iii. When a member of staff has a temporary or permanent mobility issue, or;
 - iv. Where personal security/safety is an issue
- g. For all rail journeys, staff will be expected to travel standard class. Rail tickets should be booked in advance where possible. This can be facilitated through the central finance team. Open tickets may be booked if you have no way of knowing when your meeting will finish however, they are to be avoided where possible.
- h. Where air travel is the most cost-effective mode of transport, value for money should be demonstrated. Flights should be booked well in advance using the most effective ticketing arrangements. All airfares should be booked via the central finance team with the authorisation of the Chair of Trustees.

Subsistence

- a. NB: Alcohol and tobacco are not claimable under any circumstances.
- b. Staff may claim for the reasonable cost of meals whilst away from home on official Trust business. Only actual cost can be claimed (up to the limits set out below) and receipts must be provided:
 - i. Breakfast when staying away from home overnight if not part of the stay package – up to £10
 - ii. Evening meal can be claimed if staying away from home overnight or arriving home after 20.30 – up to £20
- c. Accommodation should be booked through the central finance team using methods that obtain the best rate and are value for money in the location. Accommodation must be budget/standard class and must adhere to the following limits:
 - i. London – up to £200 per night excluding VAT
 - ii. Outside London – up to £100 per night excluding VAT