PENK VALLEY ACADEMY TRUST

Procurement Policy

A Statement of Policy

Adopted by Trustees:	
Signed:	
Date:	Summer 2026
This policy is reviewed annually by the Audit Finance & Risk Committee.	
Next Review date:	Summer 2027

COLLABORATION CHALLENGE CURIOSITY CARE

POLICY INFORMATION

Date of last review:	Summer 2026	**Review period:**	Annually
Date ratified by Trustees:	Summer 2026	**Trustee committee responsible:**	Audit Finance and Risk
Policy owner:	Chief Finance Officer	**Executive team member responsible:**	Chief Finance Officer

Reviews/revisions

Review date	Changes made	By whom
Spring 2025	New policy in line with the latest procurement regulations and the DfE Routes to Buy. (Template from SBM Services Toolkit)	CFO
Summer 2026	PCR thresholds amended in line with updated guidance as at 01.01.2026.	CFO

Equality and GDPR

All Penk Valley Academy Trust policies should be read in conjunction with our Equal Opportunities and GDPR policies.

Statement of principle – Equality

We will take all possible steps to ensure that this policy does not discriminate, either directly or indirectly against any individual or group of individuals. When compiling, monitoring and reviewing the policy we will consider the likely impact on the promotion of all aspects of equality as described in the Equality Act 2010.

Statement of principle – GDPR

Penk Valley Academy Trust recognises the serious issues that can occur as a consequence in failing to protect an individual adult's or child's personal and sensitive data. These include emotional distress, physical safety, child protection, loss of assets, fraud and other criminal acts.

Penk Valley Academy Trust is therefore committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the Data Protection Act (DPA)/GDPR.

Penk Valley Academy Trust will be referred to as **PVAT** for the remainder of the document which includes all schools who are members of PVAT, business operations and centralised services.

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PROCUREMENT POLICY

1. Introduction

The Procurement Policy explains Penk Valley Academy Trust's ('The Trust') underlying approach to procurement. It details how the trust will manage its procurement to ensure compliance with relevant legislation.

2. Purpose

This Procurement Policy forms part of the trust's internal control and governance arrangements.

The policy explains the trust's underlying approach to procurement. It gives key aspects of the procurement process and identifies the main reporting procedures.

It is the trust's policy 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 Public Contracts Regulations 2015 and The Bribery Act 2010.

The trust's Scheme of Delegation and Financial Procedures outline who has authority to select contractors and award contracts and/or raise orders. Failure to comply with either this Procurement policy, the trust's Financial Procedures or Scheme of Delegation may result in withdrawal of authority and / or disciplinary actions.

The purpose of this document is to make the trust's Procurement policy clear and signpost staff undertaking procurement activity to appropriate procedural guidance.

The trust's Procurement policy is applicable to all purchasing activity regardless of value and should be followed by all staff involved in purchasing whether centrally or school/academy based.

All procurement within the trust and its schools/academies shall be carried out in such a way to ensure compliance with legal requirements, including the Public Contract Regulations 2015, the trust's Financial Procedures and Scheme of Delegation and any other requirements of the Department for Education (DfE).

This policy is intended to reflect and support the aims of the trust by working with staff and suppliers to optimise value for money in the procurement of works, goods and services. It aims to balance efficiency against risk factors in achieving value for money whilst promoting compliance and sustainability.

There is a duty on all 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 our business needs.

This policy also complies with our funding agreement and articles of association.

3. Approach to Procurement

The following key principles outline the trust's approach to procurement:

- Compliance: When purchasing and contracting for goods and services, the trust and its schools/academies must demonstrate compliance with procurement legislation and the proper and effective use of public funds at all times. Purchasing procedures should also ensure that the goods, services and work procured are for the correct quantity and quality, arrive on time and achieve best value.

- Transparency and Non-Discrimination: In all purchasing activity the trust 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 services provider.

- 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 dealing of the Trust.

- Accountability: The trust is publicly accountable for its expenditure and for the conduct of its affairs.

- 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, consideration should also be given to other factors such as quality, suitability, availability, reliability of the supplier, terms available etc.

4. Public Contract Regulations 2015 (PCR)

The trust is deemed to be a 'contracting authority' because they largely receive their funds from the UK taxpayer via the Department of Education ('DfE'). As a contracting authority, the trust must consider PCR 2015 every time they place a significant order for goods, services or building works. If a purchase is above a certain threshold, then formal public procurement processes must be followed. The current thresholds can be found at:
https://www.gov.uk/guidance/buying-procedures-and-procurement-law-for-schools/find-the-right-way-to-buy#euprocurementthresholds
When calculating whether the contract value is over the threshold, you must include the total cost of the contract until its termination date and also include VAT.
If you are in any doubt regarding the thresholds, please refer to the Trust's Chief Finance Officer (CFO).

5. Value for Money

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.

Please refer to the Scheme of Delegation for higher value thresholds that must be managed by the Chief Finance Officer (CFO) or Chief Operating Officer (COO) or their delegated representative and in these cases early involvement is recommended to ensure expectations are clear and timelines are achievable.

Unless below the threshold for obtaining multiple quotations or tenders, all procurement of goods, works, services or consultancy should be acquired by effective competition, including adequate publication of the contract opportunity, unless there are convincing and justifiable reasons to the contrary. Competition promotes efficiency and effectiveness in expenditure. Awarding contracts on the basis of value for money following competition contributes to the competitiveness of supplies.

The trust has a duty to comply with the requirements of their procurement obligations under the Academy Trust Handbook, the Public Contracts Regulations 2015 and Academy Funding Agreements. In order to do so the CFO or their delegated representative will review all proposed purchases over the threshold detailed in the Scheme of Delegation in the context of total trust expenditure to come to a decision whether the potential requirement to aggregate is complementary or contrary to the requirement to show value for money.

6. Financial Authority to Commit Expenditure

Any process which involves committing the trust or one of its schools/academies to expenditure must be approved in accordance with the Scheme of Delegation. The Scheme of Delegation confirms who has the authority and to what financial level.
All procurement should be requisitioned through the Finance system with a purchase order unless the activity is on the exception list detailed in the Financial Procedures.

Any member of staff placing a purchase order on behalf of the trust or one of its schools/academies must be sure that they have the correct level of authority to do so in accordance with the Scheme of Delegation and where required, must obtain approval from a more senior member of staff with a higher approval limit if necessary.

No employee is authorised to commit the trust or one of its schools/academies to expenditure without first ensuring that there is adequate budget provision.

Schemes of work should not be artificially broken down into smaller orders to phase the issue of purchase orders and thereby circumvent either authorisation levels or the requirement to obtain further quotes/tenders.

7. Routes to Buy

The various transactional thresholds and procurement processes required are covered in detail in the Trust's Financial Procedures and Scheme of Delegation and follows the DfE 'Routes to Buy', however, the broad, approximate thresholds are outlined briefly below:

Route to Buy	Value
Route 1: Use a DfE framework agreement	All values
Route 2: Use catalogues to find low value goods and services	Under £5,000
Route 3: Get at least 3 quotes from suppliers for medium value goods or services	£5,001 to £50,000
Route 4: Advertise a contract and run a tendering process for high value goods and services which are below the Public Contracts Regulation (PCR) threshold	From £50,001 and above
Route 5: Run a PCR compliant tendering process for goods and services above the PCR threshold	PCR thresholds Goods: £207,720 (inc. VAT) Works: £5,193,000 (inc. VAT) Most services: £207,720 (inc. VAT) Some services for education are covered by the 'light touch regime'. This threshold is £663,540 (inc. VAT). See Gov.uk website for more details.

For all procurement activities, the trust will first check the DfE approved frameworks and see if an appropriate framework is already in place. If there is not an appropriate framework in place, the trust will follow the next most appropriate route to buy (routes 2-5).

In the case where contracts may be awarded to companies who the Members, Trustee or staff have declared as a related party, there is a requirement to notify the DfE in advance and to seek DfE approval for those contracts that exceed £40,000 either individually or cumulatively.

8. Dispensations/Scheme of Delegation breaches

In limited circumstances a dispensation from the requirement to obtain alternative quotes may be granted. 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.

All dispensations from schools/academies require prior approval from the CFO before progressing and must not result in a breach of procurement legislation or be contrary to the Trust scheme of delegation.

All dispensations from the CFO or their delegated representative require prior approval from the Chief Executive Officer (CEO) before progressing.

- All dispensation requests, whether approved or rejected will be reported to the Audit, Finance & Risk Committee. Staff may be called upon to attend the Audit, Finance & Risk Committee to explain the reasons for requesting a dispensation.

Subject to approval as outlined in the trust's Scheme of Delegation, dispensations may be granted for the following reasons:

- Unforeseen emergency requirement;
- 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;
- An extension is required to a current contract in order to allow sufficient time to complete a competitive tendering exercise;
- 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 Value For Money analysis must be documented) and only for use in circumstances to be approved in accordance with the scheme of delegation, under specific advice of the CFO in terms of compliance with the EU and UK legislation and subject to approval by the CEO and subsequently reported to the Audit, Finance & Risk Committee.

A record of the reason(s) for the seeking and granting/declining of dispensations will be kept for at least three years.

9. Raising Orders

Following the raising of a requisition which must be approved in accordance with the Scheme of Delegation, official orders must be raised for all goods, works, services and/or consultancy required by the trust or one of its schools/academies unless specifically exempted. The Financial Procedures document the purchasing process and contains adequate controls to ensure that:

- Official orders are raised in respect of all goods, services and works required by the trust and its schools/academies, except for those specifically exempted;
- Only goods, services and works required by the trust and its schools/academies are ordered;
- Competitive quotations or tenders are obtained for all orders where the value of goods, services or works, individually or for a series of contracts, would exceed the relevant financial thresholds;
- Orders for goods, services and works are placed with the most appropriate suppliers in terms of costs, quality and delivery;

- Goods, services and works received are in accordance with those ordered;

- Payments are made only in respect of invoices authorised in accordance with the approved scheme of delegation and the trust's funds are adequately safeguarded;

- All payments are accounted for properly, promptly and in full.

Specific exemptions to the requirement to raise an official purchase order are limited to:

- Energy
- Waste Disposal
- Printer services
- IT support costs
- Entrust SLAs
- Alternative provision
- Exams
- Visits
- Supply Teaching
- Catering Supplies

Details outlining the number of non-order invoices paid will be reported to the Audit, Finance & Risk Committee. The CFO may be required to attend in order to explain any non-compliance.

Before raising any order, checks must be carried out to ensure that no one who has declared a conflict of interest in relation to the purchase or the supplier/service provider has been involved in the selection process.

No orders shall be placed, or contracts altered or extended, with the intention of avoiding the relevant thresholds applicable within the Financial Regulations or Scheme of Delegation. In the event that the terms of any purchase order or contract have to be amended, the appropriate approval in line with Scheme of Delegation will be sought.

10. Purchase Cards

The trust recognises the benefits of purchase cards as an alternative means of paying for goods and services. Ideally, purchase cards should only be used for emergencies but the Trust appreciates there are advantages in using purchase cards such as, the opportunity to make online purchases and to seek discounts from suppliers on the basis that they receive immediate payment.

Full details governing the distribution and use of purchase cards is included in the Trust's Financial Procedures.

11. Contract Agreement/Terms and Conditions

Any agreement, contract or lease with a supplier which requires a signature by a member of trust or its school/academy staff (not including general orders for goods and services) should be forwarded to the CFO or their delegated representative for review prior to signature.

A signature on an agreement or contract, or even an email response indicates that the trust or its school/academy accepts the suppliers Terms and Conditions which may not be favourable.

Following the identification of the most favourable offer for the trust or its schools/academies, whether by best value, quotation or tender, consistent with the thresholds identified above, the contract may only be awarded by those officers to whom the Trust Board has delegated such authority within the approved Scheme

of Delegation. The required authority to accept other than the lowest quotation or tender is also included within the Scheme of Delegation.

12. Payment and Payment Terms

Unless a purchase card has been used to make a payment, all invoices from suppliers should be entered on the financial accounting system for appropriate approval and then paid by BACS/Cheque.

The trust's standard payment terms are 30 days following receipt of a correct invoice, unless alternative arrangements have been agreed at purchase order stage, for example orders placed by schools/academies shortly before the summer break. The Trust generates a payment run fortnightly during term time and endeavours to run payment runs regularly through school closure periods.

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 sign off appropriate sign off in line with the Scheme of Delegation.

13. Tenders

Please refer to the Trust's Scheme of Delegation for thresholds; any expenditure over the tender limit threshold must be subject to a PCR compliant buying process in accordance with the trust's Financial Regulations and UK Public Contract Regulations 2015.

All tendering where the anticipated lifecycle costs are in excess of the tender limit threshold within the Scheme of Delegation must be undertaken by either the CFO or COO or their delegated representative.

The CFO or COO or their delegated representative will select and manage the most appropriate procurement process in accordance with the anticipated value, any potential aggregation and trust tendering guidelines which are compliant with current procurement legislation. This may include the use of frameworks or bespoke tenders.

Tendering procedures may take up to six months depending on lifecycle costs and compliance with legislation. Failure to programme sufficient time for procurement will not be reason to grant a dispensation.

14. Reporting Requirements

For contracts over the tender limit threshold within the Scheme of Delegation (excluding VAT) the decision and criteria should be reported to the Audit, Finance and Risk Committee.

The Audit, Finance and Risk Committee may refer any larger tender items to the Trust Board for further discussion and approval. In cases where, due to the timing of the meetings, this would not be practicable, and any undue delay would cause significant operational issues, the Chief Executive Officer acting jointly with the Chair of the Trust Board may accept a tender but this must be reported to the next meeting of the Audit, Finance & Risk Committee.

The CFO or COO or their delegated representative is required to complete a tender report for all tenders in accordance with procurement legislation.

15. Contracts Register

The CFO or their delegated representative will maintain a contract register detailing all procurement activity undertaken, which records all related documentation, details of the winning bidder, price, duration of the contract, the procurement process followed, and details of any indemnities included in the contract.

16. Equal Treatment of Suppliers

One of the key principals of procurement legislation is that all suppliers are treated equally in any competitive process regardless of value. They should have the same availability of access to specifications, plans, trust staff time, facilities, etc.

Evaluation criteria should be decided in advance and made available in full to suppliers to show they will be treated fairly.

All bidders are entitled to be debriefed at the end of the process and informed of the winning bidder.

Any discussions and or correspondence prior to the conclusion of procurement should be on a "without commitment" basis and this phrase should be clearly stated on any such correspondence. The contract offer or purchase order should be the only point at which commitment is made.

17. Acceptance of Gifts or Hospitality

Full details are included in the Gifts & Hospitality Policy.

18. Leases

The trust or any of its schools/academies should not enter into any finance lease without prior approval from he DfE, unless the goods appear on the DfE approved goods list as this would be in contravention of the requirements of the Academy Trust Handbook.

The trust may enter into operating leases; however, this is subject to the approval of the CFO and Audit, Finance & Risk Committee, in line with the Scheme of Delegation.

If there is any doubt, please refer to the CFO for clarification.

19. Payment in Advance

With the exception of some software licenses, payment should not be made in advance of receipt of goods, services, works or consultancy. If a supplier requests payment in advance this should be discussed with, and approval sought from, the CFO.