



The Crossley Heath School

Savile Park, Halifax, West Yorkshire HX3 0HG

Tel: 01422 360272 • Fax: 349099 • email admin@crossleyheath.org.uk

Procurement Policy

Version Control

Version Number	Purpose/Change	Author	Date
1	Original policy for review	Carol Spencer	
2	Updated policy to align with new SOFD policy and DfE legislation Approved by the Full Board	Nicola Beaumont	September 2026

Contents

1. Aims and Scope	3
2. Legislation & Guidance	3
3. Purchase Thresholds	4
4. Approval Authority	5
5. Preparing to Buy	6
6. Routes to Buy	7
7. Tender Process	9
8. Conflicts of Interest	12
9. Raising Orders	14
10. Managing Contracts	14
11. Record Keeping	15
12. Appendix	16

1. Aims And Scope

The Academy wants to achieve the best value for money from all purchases. This means securing the correct quality, quantity and time at the best price possible. A large proportion of purchases will be paid for with public funds and therefore it is necessary to maintain the integrity of these funds by following the general principles of:

- Probity - it must be demonstrable that there is no corruption or private gain involved in the contractual relationships of the Academy
- Accountability - the Academy is publicly accountable for its expenditure and the conduct of its affairs
- Fairness - that all those dealt with by the Academy are dealt with on a fair and equitable basis

This policy should be used in conjunction with the Scheme of Financial Delegation policy (SOFD) to ensure that all purchasing is undertaken in accordance with school protocol, via the correct processes and by designated staff.

- 1) The SOFD ensures that individual roles have appropriate limits to their financial activities and that everything aligns with DfE thresholds. It identifies the authority levels for individual roles and who should be undertaking what activities
- 2) The Procurement policy details what must be done as preparation for an order, through to placing and approving an order and, finally, its subsequent management

The aims of the Procurement policy are to ensure that:

- the school has open and transparent procurement procedures
- procurement procedures are compliant with procurement legislation and the Academy Trust Handbook (ATH)
- value for money (economy, efficiency and effectiveness) is secured
- conflicts of interest are managed adequately and appropriately
- all staff involved in procurement are aware of the procedures they must follow

The policy also includes the procedure for tendering.

2. Legislation And Guidance

This policy is based on:

- DfE guidance on buying for schools
- DfE guidance on the Schools Financial Value Standard (SFVS) checklist
- The UK Procurement Act 2023
- Compliance with the Local Authority's scheme for financing schools

3. Purchase Thresholds (Net Of Vat Unless Otherwise Stated)

3.1 Low To High Value Purchase Thresholds

Purchase levels are divided into the following:

- Low value purchase: under £9,999
 - Medium value purchase: £10,000 – £50,000
 - High value purchase: over £50,000, but below the public procurement threshold

3.2 Public Procurement Threshold/UK Procurement Act 2023

If it is estimated that the cost of a contract is near to or above the threshold for public procurement spending, the school will seek legal advice to ensure it runs a buying process compliant with the Procurement Act 2023. The current threshold for the supply of goods or services is **£207,720 inclusive of VAT (1 January 2026)** per the Procurement Act.

A 'light touch contract', with a higher threshold of **£663,540, inclusive of VAT**, applies for some contracts that are specifically for certain social, health, education and other public services provision. Legal advice should be sought to determine if any procurement run by the school qualifies as a 'light touch contract'.

Works **over £5,193,000, inclusive of VAT (1 January 2026)** must adhere to either an open procedure (a single-stage tendering procedure with no restriction on who can submit a tender) or a competitive flexible procedure (more freedom to design your own competitive tendering procedure as appropriate to the contract) per the Procurement Act. Both are explained in Section 7.

For high-value contracts, notices must be published at each of the five stages of the procurement procedure:

- Planning
- Tender
- Award
- Contract
- Implementation

All contract notices must be published on the central digital platform (this is an enhanced version of the Find a Tender service).

3.3 Recent DfE Obligations (New ATH 2026/2027)

Trusts must use the Government Commercial Agency, Supply Teachers and Education Recruitment for their supply staffing requirements, unless they have an alternative compliant agreement with rates which do not exceed those available through the framework.

Trusts must use the DfE Energy for Schools service or a DfE approved energy deal as shown under Energy on 'Get Help Buying for Schools' unless an alternative agreement with comparable pricing has been sourced. This will apply when energy contracts are renewed.

Trusts must ensure that all Management Information System (MIS) contracts are aligned with the DfE's MIS framework by September 2027.

- where a contract expires before 1 September 2027, any contract extension or replacement must be for no more than 12 months and act as a transitional arrangement ahead of framework procurement
- where a contract extends beyond 1 September 2027, Trusts must not use extension options that delay transition
- Trusts must use the DfE MIS framework when awarding their next full-term MIS contract

- if a Trust cannot reasonably award a contract of 12 months or less, it may proceed only where the supplier agrees to the DfE's latest MIS contractual principles, available in 'Get Help Buying For Schools'

4. Approval Authority

This is covered by the SOFD and summarised below. Appendix A tabulates the Scheme Of Delegations for Procurement.

CONTRACT LEVEL	CONTRACT VALUE	APPROVAL LEVEL
De minimis	Up to £2,000	Budget Holders, Department Heads, Trip Organisers
Low	Up to £5,000	SLT
Medium	Up to £30,000	Chief Finance Officer
Medium	Up to £50,000	Head Teacher/Accounting Officer
High	Between £50,000 and £100,000	• The Business And Resources Committee (BRC)
High	Over £100,000	The Trust Board (subject to adherence to the Public Procurement Act and threshold of £207,720)

5. Preparing To Buy

All Academy staff involved in procurement decisions must follow this policy and the stated process for each new procurement.

5.1 Written Specification

This is required for all purchases over the de minimis level. The specification should set out relevant requirements, including:

- Product/works/service description
- Technical specifications
- Quantity
- Delivery schedule

This information will be required to populate a Purchase Order (PO). For higher value purchases, it may be appropriate to conduct soft market testing by speaking to suppliers. Any information provided to suppliers at this stage will also be shared with suppliers who bid later. The specification will not favour the suppliers already spoken to.

5.2 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
- VAT
- Delivery charges
- Ongoing maintenance costs
- Running costs
- Cost of removing and disposing of an item or service when it's no longer required

For fixed term contracts with an option to extend the term, the value of the contract will be the price of the fixed term plus the potential extension period. Single contracts will not be split into smaller contracts to bypass the purchase thresholds as set out in Section 3. The cost calculated will drive the correct buying process to use.

5.3 Business Case

A business case will be required for purchases over £50,000. This must be approved by the relevant Trustees. The business case should include:

- The benefits (quantified where possible) and reasoning for undertaking the spend
- Draft specification
- Estimated cost
- Potential suppliers for consideration
- Any opportunities to work with other schools

At an appropriate stage post implementation, a review of the business case and its impact should be undertaken to assess whether there has been a successful result and as a learning/development experience to improve the quality of future business cases. Relevant reviews should be requested by the Trustees.

6. Routes To Buy

6.1 Orders Above £2,000 But Less Than £5,000

One written quote should be obtained for all orders between £2,000 and £5,000 to provide a supporting record. Orders below £2,000 should follow the process in Section 9.

6.2 Orders £5,000 Or Above but Less Than £50,000

At least three written quotations should be obtained for all orders between £5,000 and £50,000 to identify the best source of the goods/services. Written details of quotations obtained should be prepared and retained by budget holders for audit purposes. Telephone quotes are acceptable if these are evidenced and email confirmation of quotes has been received before a purchase decision is made.

Orders above £50,000 must be approved by the Business and Resources Committee (BRC), including if outside of the agreed budget. Orders above £100,000 must be approved by the Full Board.

All goods/services ordered with a value above £50,000, or a series of contracts which in total exceed £50,000, must be subject to formal tendering procedures. The UK Procurement Act 2023 threshold for the purchasing of all public sector goods and most services is £207,720 inclusive of VAT. Purchases above this threshold must follow the published procurement process. The school will only follow this process if needs cannot be met through a framework agreement.

DfE guidance must be followed, with specialist support sought as necessary, to ensure that the school process is compliant with the Procurement Act 2023. All members of staff involved in this process must have completed appropriate training on the Procurement Act.

Tenders will be assessed following the process set out in Section 7 and after considering appropriate legal advice and additional requirements for purchases over the public procurement threshold.

Framework agreements are arrangements that a contracting authority, such as a public sector buying organisation like the DfE, 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 chosen, the school will either pick the best value supplier from a list or run a mini competition between listed suppliers, where each supplier will be asked to submit their bid and the best one will be selected. The reasons for the choice of framework and for the choice of supplier will be clearly recorded.

6.3 Catalogues For Purchasing Low Value Goods

To buy goods under the low value threshold, catalogues should be used to compare similar products and to choose the supplier that meets requirements and offers best value for money. Where possible, the following DfE-reviewed catalogues should be used:

- CCS purchasing platform – for technology products including laptops, smartphones, accessories and software and office machines that print, scan, or copy (multi-functional devices)

- ESPO – covers a range of goods including stationery, art and crafts, classroom resources, furniture, office essentials, sports equipment, and presentation and display equipment
 - YPO procurement product catalogue – covers a range of products from UK suppliers, including pens and paper, storage, computers, audio visual equipment, and furniture
- Staff are also free to carry out their own research and find alternative suppliers, if these offer better value for money.

6.4 Quotes For Low and Medium Value Purchases

This process will be used if requirements cannot be met through a framework or a catalogue. Quotes from at least three suppliers will be secured. 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 the quote is required
- When a decision will be made
- How the supplier can ask questions
- If needed, a link to the school's terms and conditions
- The quotes will be assessed using the award criteria provided

6.5 Tendering Procedure For High Value Purchases Under The Public Procurement Threshold

The school will only follow this process if needs cannot be met through a framework agreement. DfE guidance will be followed and specialist support sought, as necessary.

To initiate the procurement, the school 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 30 days before the submission deadline to ensure adequate time for suppliers to prepare their bids. There will be a clarification period of 14 days to allow potential suppliers to seek clarification on the procurement requirements and 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.

7. Tender Process

There are three forms of tender procedure: open, restricted and negotiated. The circumstances in which each procedure should be used are described below:

- **Open Tender** - this is where all potential suppliers are invited to tender. The budget holder must discuss and agree with the Chief Finance Officer (CFO) how best to advertise for suppliers e.g. general press, trade journals or to identify all potential suppliers and contact them directly if practical. This is the preferred method of tendering as it is most conducive to competition and the propriety of public funds
- **Restricted Tender** - this is where suppliers are specifically invited to tender. Restricted tenders are appropriate where:
 - there is a need to maintain a balance between the contract value and administrative costs
 - a large number of suppliers would come forward or because the nature of the goods is such that only specific suppliers can be expected to supply the academy's requirements
 - the costs of publicity and advertising are likely to outweigh the potential benefits of open tendering
- **Negotiated Tender** - the terms of the contract may be negotiated with one or more chosen suppliers. This is appropriate in specific circumstances where:
 - the above methods have resulted in either no or unacceptable tenders
 - only one or very few suppliers are available
 - extreme urgency exists
 - additional deliveries by the existing supplier are justified
 - a supplier already on site and with the necessary equipment/machinery could be asked to undertake additional work if cost and time savings rendered this the most effective option

7.1 Preparation For Tender

Full consideration should be given to the:

- objective of the project
- overall requirements
- technical skills required
- after sales service requirements
- most suitable form of contract

It may be useful, after all the requirements have been established, to produce a ranking (e.g. mandatory, desirable and additional) and award marks to suppliers on fulfilment of these requirements to help reach an overall decision. Current advice from the DfE in gaining and showing 'Value for Money' should always be considered.

7.2 Invitation To Tender

If a restricted tender is to be used, then an invitation to tender must be issued. If an open tender is used, an invitation to tender may be issued in response to an initial enquiry. An invitation to tender should include the following:

- an introduction/background to the project
- the scope and objectives of the project
- the technical requirements

- the implementation of the project
- the terms and conditions of tender
- the form of response.

7.3 Aspects To Consider

Financial

- Like should be compared with like and if a lower price means a reduced service or lower quality, this must be borne in mind when reaching a decision
- Care should be taken to ensure that the tender price is the total price and that there are no hidden or extra costs
- Scope for negotiation

Technical/Suitability

- Qualifications of the contractor
- Relevant experience of the contractor
- Descriptions of technical and service facilities
- Certificates of quality/conformity with standards
- Quality control procedures
- Details of previous sales and references from past customers

Other Considerations

- Pre sales demonstrations
- After sales service
- The financial status of the supplier. Suppliers in financial difficulty may have problems completing contracts and the provision of after sales service. It may be appropriate to have an accountant, or similarly qualified person, examine audited accounts etc.
- Credit Checks
- References
- Visit work on other establishments

7.4 Tender Acceptance Procedures

The invitation to tender should state the date and time by which the completed tender document should be received by the Academy. Tenders should be submitted in plain envelopes clearly marked to indicate the contents. The envelopes should be time and date stamped on receipt and stored in a secure place prior to tender opening. Tenders received after the submission deadline should not normally be accepted.

7.5 Tender Opening Procedures

All tenders submitted should be opened at the same time and the tender details should be recorded. Two staff should be present for the opening of tenders as follows:

- For contracts up to £50,000 – the budget holder, CFO and Head Teacher (HT)
- For contracts over £50,000, or a series of related contracts exceeding £50,000, - either the CFO or HT plus a member of the BRC

A separate record should be established for the names of the firms submitting tenders and the amount tendered. This record must be signed by both people present at the tender opening.

7.6 Tendering Procedures

The evaluation process should involve at least two staff. Those involved should disclose all interests, business and otherwise, that might impact upon their objectivity. If there is a potential conflict of interest, then that person must withdraw from the tendering process.

Those involved in making the decision must take care not to accept gifts or hospitality from potential suppliers that could compromise or be seen to compromise their independence.

Full records should be kept of all criteria used for evaluation and, for contracts over £50,000, a report should be prepared for the BRC highlighting the relevant issues and recommending a decision. For contracts under £50,000, the decision and criteria should be reported to the BRC.

Where required by the conditions attached to a specific grant from the DfE, the Department's approval must be obtained before the acceptance of a tender.

The accepted tender should be the one that is economically most advantageous to the Academy. All parties should then be informed of the decision.

7.7 Notification Of Award

Both the successful and unsuccessful bidders will be notified in accordance with the notification requirements specified in the applicable guidance for procurements below and above the procurement threshold.

7.8 Contract Finalisation

The school will work closely with the winning bidder to ensure a smooth transition from the bidding process to contract execution. There will be no commitment, and no work shall begin, until both parties have signed the contract.

8. Conflicts Of Interest

8.1 Register Of Interests

It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from the decisions they make. To avoid any misunderstanding that might arise, all Academy Trustees and staff with significant financial or spending powers are required to declare any financial interests they have in companies or individuals from which

the Academy may purchase goods or services. The Register of Business Interests (RBI) is open to public inspection.

The RBI should include all business interests such as directorships, shareholdings or other appointments of influence within a business or organisation which may have dealings with the Academy. The disclosures should also include business interests of relatives such as a parent or spouse or business partner where influence could be exerted over a Trustee or a member of staff by that person.

The existence of an RBI does not, of course, detract from the duty of Trustees and staff to declare an interest whenever they are relevant to matters being discussed by the Trust Board or a Committee. Where an interest has been declared, Trustees and staff should not attend that part of any Committee or other meeting.

The RBI must be updated by either the Trust Board Chair or Chair of the BRC as soon as any change in circumstances or interests is declared or identified.

8.2 Identifying And Declaring Conflicts Of Interest

Staff responsible for the procurement of goods or services will review the RBI to identify any potential conflicts of interest 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 via the RBI
- Any member of staff or our Trust Board who believes that a conflict of interest has not been declared must report this to the Trust Board
- 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.
- There is a clear segregation 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
- Where necessary, to avoid any appearance of actual or potential bias, bids will be anonymised prior to being assessed

8.3 Related Party Transactions

The Academy must obtain prior DfE approval, using their on-line form, for contracts for the supply of goods or services to the Academy by a related party where any of the following criteria arise:

- a contract exceeds £40,000
- a contract of any value that would take the total value of contracts with the related party beyond £40,000 in the same financial year ending 31 August
- a contract of any value if there have been contracts exceeding £40,000 individually or cumulatively with the related party in the same financial year ending 31 August

For the purposes of reporting to, and approval by, the DfE, transactions with related parties do **NOT** include salaries and other payments made by the Trust to a person under a contract of employment through the Trust's payroll. Contracts or agreements with the local authority are also **NOT** related party transactions. 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, the school will perform due diligence to ensure the transaction:

- is necessary
- is in the best interests of the school
- does not compromise the school's integrity or cause reputational damage

For all related party transactions, the school will maintain clear, secure, and auditable records, 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

9. Raising Orders

Budget Holders (or their designated support staff) can create a Purchase Order (PO) on the Access Education Purchasing (AEP) system, however, they only have access to their own cost centres. If the support staff member enters a PO, the budget holder has to authorise on the system before this is notified to the Finance Team. Alternatively, the budget holder can input the PO themselves and authorise.

There are occasions where budget holders need to spend from centrally controlled budgets and therefore a PO should be created, the appropriate budget code used and the PO sent to the appropriate budget holder (often the CFO or HT) for approval.

The Finance Assistant will access the system daily to review any pending POs. They will check to ensure that the order is coded correctly and that the items are for educational resources from an approved supplier. Once the order is approved, and has been checked by the Finance Assistant, they will submit it to the supplier via AEP.

Standing orders for centrally controlled budgets should be put on the system as a PO for the CFO or HT to approve per the SOFD.

As mentioned, the SOFD authority limits for Procurement are shown in Appendix A.

10. Managing Contracts

Legal advice will be sought before entering a contract. The school maintains a contract register that is regularly shared with Trustees to make them aware of any upcoming milestones and provide them with an opportunity to scrutinise and, if necessary, challenge procurement plans.

11. Record Keeping

Records will be kept securely for as long as necessary and in line with data protection law and privacy notices. Records relating to procurement processes over the public procurement threshold must be kept for at least 3 years from the date of award of the contract.

Appendix A

CROSSLEY HEATH SCHOOL - SCHEME OF DELEGATION (PROCUREMENT)

Aligned to Academy Trust Handbook (effective 1 Sept 2026)

	Trust Board	BRC	HT	CFO	SLT	HOF	COO	Budget Holders
	> £100k and reported to BRC if outside agreed budget '>£207,720 (incl VAT) Procurement Act compliance	£50k to £100k (3 quotes)	£50k (3 quotes)	£30k (3 quotes)	£5k (1 quote)	£5k (1 quote)	£5k (1 quote)	£2k (1 quote)
Purchasing Limits								
Purchase Orders And Approvals	> £100k	£50k to £100k	< £50k	< £30k	<£5k	<£5k	<£5k	<£2k
		> £50k via formal tender process	£50k - 2 x approvers	£50k - 2 x approvers				£50k - 2 x approvers
Contracts/Leases								
BACS/Cheques Approval (Dual Authorisation)			Approves	Approves		Creates		
	Approves and ensures compliance. DfE approval required for contracts (incl cumulative) > £40k. Must use online form and publish in accounts							
Related Party Transactions		Monitors	Escalates	Checks and reports				
	Approves and ensures compliance. DfE approval required for entering in to such arrangements							
NCR (Novel, Contentious, Repercussive) Contracts			Escalates	Identifies and flags				
<u>Note:</u>								
The SLT roles (excluding the HT, CFO and COO) are - the Associate HT, Deputy Heads, Assistant Head and Associate Assistant Heads								
All figures are exclusive of VAT except where stated								