CHILTERN LEARNING TRUST

PROCUREMENT POLICY

Issued: July 2026
Review Due: July 2027

1 Trust Policy Statement

Chiltern Learning Trust (CLT) is committed to promoting transparency, fairness and value for money in all our procurement activities, whilst ensuring compliance with relevant legislation and guidance including the Procurement Act 2023 and its associated regulations.

In addition, we will use our buying power to leverage action to promote and address sustainability through the practices of our contracted suppliers and services by considering the impact of environmental, economic and social factors along with price and quality. We will also promote ethical procurement and supply chain management.

2 Introduction and Aims of the Policy

This policy sets out core guidance and principles regarding the approach to purchasing goods, services and works for our schools and for the Trust as a whole. The key principle is that procurement should always deliver the best value for money for the Trust. This means obtaining the correct quality, quantity and timing at the best price possible, ensuring that public funds are used effectively and responsibly.

This policy aims to ensure that:

- The Trust has an open and transparent policy.
- Spending decisions represent value for money.
- The Trust's funds are used only in accordance with the law, our articles of association, our master funding agreement and the Academy Trust Handbook.
- Spending is for the intended purpose, ensuring proper use of public funds.
- Conflicts of interest are managed adequately and appropriately.
- Procurement supports the delivery of wider public benefit, including social value and environmental sustainability.

It is important to note that the Trust is a sole legal entity that can enter into contracts for itself and any of our schools as a 'Contracting Authority'. The schools are not separate legal entities and any contracts awarded by individual schools will be binding on the Trust. Accordingly, the term 'Trust' in this policy also refers to the expectations on individual schools as determined by the CLT's Scheme of Delegation on authorisation levels)

3 Legislation and Guidance

This policy adheres to relevant legislation and national guidance, including, but not limited to:

- The DfE Academy Trust Handbook 2025
- The Procurement Act 2023 and Public Contract Regulations 2024, which came into force on 24th February 2025.
- The Public Contracts Regulations 2015 (where still applicable, primarily for ongoing contracts awarded under the previous legislation).
- Funding agreements with the Department for Education (DfE)
- DfE guidance on buying procedures and procurement law
- CLT Scheme of Delegation and Finance Handbook
- Charities Act 2011
- Bribery Act 2010

4 Roles and Responsibilities

This policy applies to all staff, governors and Trustees involved in procurement across the Trust, including central operations and individual schools. Specific roles include:

Trustees

Adopt this Procurement Policy and ensure alignment with the Trust's objectives.
Trustees will review value for money on large contracts and, if required, participate in any interviews with potential suppliers.
Ensure regulations regarding related or connected parties are followed.

Audit Committee

The Committee is responsible for reviewing the Trust's tendering policy and processes
Ensure compliance with procurement procedures.
Ensure spending decisions represent value for money.

Chief Finance Officer (CFO)

The CFO, in conjunction with the Finance Manager and Chief Operations Officer (COO) are responsible for:

Ensuring appropriate financial governance and risk management arrangements are in place.
Preparing and monitoring budgets.
Providing Trustees and relevant stakeholders with information to make informed decisions on procurement matters.
Overseeing and supporting competitive tendering.

Accounting Officer (Chief Executive Officer)

Is responsible for financial oversight of all transactions within the Trust.
Providing assurance to the Trust Board regarding compliance with the requirements of the DfE Academy Trust Handbook, funding agreement and all aspects of company and charitable law.
Demonstrating how the trust has secured value for money.
Ensuring that measures exist to prevent losses or misuse of the Trust's resources

All Staff

Are responsible for ensuring compliance within areas of individual scope and delegated decision-making authority.

Prior to engaging any contractor or service provider staff are required to consult the Trust's central **Supplier List** to check the status of the prospective supplier. Where a supplier is flagged on the list; typically due to historical performance issues, compliance concerns or operational difficulties; staff must not proceed.

Staff must seek and obtain formal written approval from the **Estates Manager** or **Operations Manager** prior to issuing a purchase order, signing an agreement or allowing work to commence.

This requirement ensures that appropriate risk assessments and safeguards are applied before re-engaging any supplier with a recorded history of issues.

Report any concerns or suspected non-compliance with procurement processes in

accordance with CLT's Whistleblowing Policy.

5 Needs Identification & Valuing Contracts

It is important for those responsible for procurement to clearly define the requirements and outline what goods, works, or services are needed. In accordance with CLT procurement thresholds, a formal written specification must be produced where required, detailing what the Trust intends to procure and aligning with the appropriate procurement method.

Proposed contracts need to be accurately assessed for value and the method of procurement will depend on the likely overall contract value. The contract value is determined by calculating the estimated whole-life value of the goods, works or services, including any related fees. For fixed term contracts with an option to extend the term, the contract value will be the price of the fixed term plus the potential extension period.

In particular, it is important not to deliberately divide one contract into smaller contracts to avoid procurement thresholds or rules.

Procurement must ensure that value for money is achieved. The most advantageous tender is not simply about the lowest purchase price, but should also consider quality and the whole-life cost. Procurement decisions should take account of sustainability and social value where appropriate.

Wherever possible the common needs of all of our schools will be combined into one procurement, to ensure economies of scale and value for money. Multiple-year contracts can be a potential way to achieve additional discounts.

There are specific rules in the DfE Academies Handbook in relation to leasing. For all leases, irrespective of value, guidance from the CFO or the Trust's Finance Manager before progressing should be sought.

6 Procurement Thresholds and Delegated Authority to approve purchases and enter contracts

The Trust operates a system of delegated financial authority and no member of staff may approve purchases or enter into contracts unless they have been given authority within CLT's Scheme of Delegation.

The Trust's current scheme of delegation, in respect of procurement thresholds and authority to approve purchases and enter contracts are outlined below:

Estimated Value of Procurement (excl VAT)[1]	**Procurement Procedure[2]**	**Delegated Authority[3]** to commence procurement, commit expenditure, enter contracts
Under £3,000	Single Written Quotation	**School specific contract:** Headteacher (if budgeted for) **Trust-Wide or Central Contract:** CFO, or Finance Manager, or Chief Operations Officer
£3,001 - £10,000[4]	Three Written quotations	

£10,001[5] to £50,000	Three Written quotations or Formal Tender	**School specific contract:** Headteacher (if budgeted for), with CFO approval **Trust-Wide or Central Contract:** CFO, in conjunction with the CEO and COO
£50,001 to £150,000*	Formal Tender	CFO in conjunction with the CEO (Accounting Officer)
Above £150,001*	Formal Tender (following PCR 2024 rules, where relevant)	Board of Trustees, or Chair of Trustees with delegated authority

***** equivalent to the current Public Contract Regulations 2024 (PCR) lowest threshold of £214,904 for goods and supplies inclusive of VAT. See below for more information on PCR.

[1] This estimate should include the cost of the goods or services, delivery, installation, service/maintenance, disposal and any options to renew or extend the contract
[2] Procuring via an approved Framework supersedes the requirement to follow the procurement procedure specified in the above table (CFO to advise/direct)
[3] Persons with Delegated Authority to commit expenditure are required to check and confirm the appropriate procurement procedure has been followed before approving a purchase order requisition, invoice or signing a contract
[4] In respect of School specific contracts, the Headteacher must notify the CFO in respect of any contracts over £5,000.
[5] For School specific contracts or projects over £10,000 the Headteacher must seek initial advice and in principle agreement from the Trust's Central Team, before the school's LGB is also consulted. An application to the Trustees for final approval can then be submitted via the Central Team, using the form attached as Appendix 1 to the Trust's Scheme of delegation.

All controls and procedures related to expenditure equally apply to any procurement via a procurement charge card. Approvals must always be secured in advance of making any purchase, whether online, in person or over the phone. All card transactions must be accompanied by an appropriately authorised purchase order and receipt, retained for accounting purposes and must be used solely for company purchases. This requirement must be followed for any spend.

Capital works are subject to all the aforementioned thresholds and procedures. The Trust's Central Capital programme which is funded through a combination of DfE School Condition Allocation (SCA) and top slices from qualifying schools, is managed centrally by the COO.

7 Framework Agreements and Routes to Market

As recommended by the DfE, established framework agreements should be used to contract suppliers wherever possible. These frameworks can help the Trust and schools to procure goods and services compliantly from a list of pre-approved suppliers, with agreed legal protections, terms and conditions. The benefits of frameworks include having already undergone a competitive tender process and it can often be quicker and easier than running a bespoke tender exercise. Each individual framework agreement will have their own specific process to follow. Whilst often free to access, some framework providers may charge for their services, so it is important to check this with the provider.

The DfE has a number of approved framework agreements, but others are available. For more information, visit DfE-approved frameworks - https://find-dfe-approved-framework.service.gov.uk/

Only the Trust's Central team has the authority to register the Trust or individual schools on a new framework. For advice on frameworks or to initiate registration with a new framework provider, please consult the CFO. CLT is already registered with several DfE-recommended framework providers, including Crown Commercial Services (CCS), Crescent Purchasing Consortium (CPC), Everything ICT (EICT), North East Procurement Organisation (NEPO) and Yorkshire Purchasing Organisation (YPO).

Depending on the chosen framework, the best value supplier will be selected from a list or a mini- competition will be conducted among listed suppliers. In either case, adherence to the DfE guidance on procurement is essential to ensure good practice. The rationale for selecting a particular framework should be clearly documented throughout the process and approach agreed with the CFO.

Whilst some frameworks offer the option to directly award contracts, it is important to clearly justify why a further competition was deemed unnecessary and how value for money can be demonstrated. Direct award should only be relied upon with the express consent of the appropriate delegated authority and must be agreed with the CFO before any orders are placed. Direct award cannot be used where the value of the procurement exceeds the Procurement Act 2023 threshold for regulated procurement.

As a general rule, subject to the thresholds outlined within this Policy, competition should be proportionate to the level of expenditure, complexity and risk.

Please refer to Appendix 1 Procurement Decision Tree.

Informal Competition <£3k

For procurement under £3k, a single written quotation is acceptable. However, it is still necessary to demonstrate that the purchase offers value for money. Therefore, it is recommended to source additional quotes wherever possible. As detailed above, framework agreements should be considered wherever practical. The DfE also recommend the use of catalogues for informal competition - Once the desired product is identified, similar products should be compared to determine which offers the best value for money. Research can be conducted to find suppliers or use DfE recommended catalogues to help achieve the best value. Current DfE recommended catalogues include CCS, ESPO and YPO.

Purchase orders are required for all purchases unless exempt expenditure, i.e. energy is stated in the CLT's Scheme of Delegation. If unsure or believe this is not practical, guidance can be sought with the central finance team.

Competitive Procurement £3k to £10k

For procurement between £3k and £10k at least 3 written quotations should be obtained from suppliers to ensure competitive pricing and value for money. This involves researching suppliers, assessing bids and choosing the supplier that offers the best value. Suppliers should be provided with the same information and a reasonable amount of time to prepare their quotations. A summary of the quotes received should be provided to the authoriser along with clear justification as to why the recommended supplier represents best value. This is also required by auditors.

Again, framework agreements should be considered wherever possible to streamline the procurement process and ensure compliance. Alternatively, a competitive tender process

could be run where appropriate.

Competitive Procurement £10k to £50k

For procurement between £10k and £50k framework agreements must be considered wherever possible, or a competitive tender process could be run where appropriate. As a minimum at least 3 written quotations should be obtained from suppliers to ensure competitive pricing and value for money.

A summary of the quotes received, or a tender report, should be provided to the authoriser along with clear justification as to why the recommended supplier represents best value. This is also required by auditors.

Competitive Procurement £50k to £150k

For procurement between £50k and £150k framework agreements must be used wherever possible or a formal competitive tender process must be run where appropriate. A formal tender report must be provided to the authoriser along with clear justification as to why the recommended supplier represents best value. This is also required by auditors.

Procurement in excess of £150k, including Regulated Procurement exceeding PCR Procurement Thresholds

All contracts in excess of £150k will require either procurement via a framework agreement or a competitive tender process.

From January 2026, education-related procurement thresholds (incl VAT) are £207,720 for goods and services, £5,193,000 for works, and £663,540 for specific services listed in Schedule 1 of the Procurement Regulations.

For purchases exceeding the relevant PCR Procurement threshold the Trust must ensure that a compliant procurement process is followed.

This will involve either a framework agreement or a competitive tender process. It should be noted that the Trust will make high-value purchases without a framework only in rare circumstances and only with the appropriate legal support in place.

High-value and Regulated (PCR) procurement in excess of £150k will be managed by the Central Team and the Trust Board will be advised.

8 Tendering

As detailed above, established framework agreements should be used to contract suppliers wherever possible. If a competitive tender is initiated, it will be managed with support of the Central Finance team. The following process should then be followed:

Create a specification

Assess the market – and determine the appropriate tender procedure:

- ***Open Procedure*** – allows anyone to bid for the tender requirement
- ***Competitive Flexible Procedure*** – allows the procurement to be tailored through a number of stages, using evaluation at each stage to restrict the number of bids.

Check the trust's position in relation to the PCR procurement thresholds

Develop a contract – a contract will include terms and conditions, service levels expected, a contract management plan and an exit strategy.

Identify and shortlist potential suppliers – consider the potential suitability of suppliers by gathering general information and verifying their capabilities. Depending on the value of the contract it may be necessary to run a Pre-Qualification Questionnaire process to undertake detailed due diligence.

Establish the assessment criteria – to establish criteria that will enable the evaluation of suppliers' bids, ensuring they best meet the requirements outlined in the specification, and identify the most advantageous tender that best combines price and quality. The Trust will consider social value in procurement decisions, prioritising suppliers that contribute positively to the local community and the environment.

Create a timeline for the tender process – this will include the dates of the clarification period, the deadline for submitting tenders and the date we expect to award the contract

Prepare the tender documents – this would usually include:

A covering letter with a timeline for the process
Instructions on how suppliers can ask clarification questions and submit their tender
The specification
A pricing schedule
The contract's terms and conditions
Contract management requirements and Key Performance Indicators (KPIs)
Award criteria, including the scoring system and any weightings

Advertise the contract – For regulated procurement it is important to note that the relevant notices must be posted on the government's new Central Digital Platform.

Run the tender process and provide clarifications

Receive and evaluate tender responses – at least 2 people will be present for opening the tender returns. They will be scored and evaluated; records of decision making and moderation decisions will be kept. The status of suppliers must be verified against the central debarment list. Any supplier found to be on the list must be excluded from the procurement process in line with the Procurement Act 2023. The evaluation may include interviews with potential suppliers.

Notify bidders – both the successful bidder and the unsuccessful bidders will be informed at the same time, ensuring adherence to the 8 day mandatory standstill period.

Challenges from unsuccessful bidders – if an unsuccessful bidder challenges the fairness of the process, they will be contacted to explain that a fair process has been conducted and good records have been maintained. Should a formal challenge be made, then the contract will not be formalised and legal advice will be sought.

Finalise the contract – (if there are no legal challenges) and advertise the award on the Central Digital Platform if it is a regulated procurement. For all contracts over £50,000 a detailed Tender report should be prepared for the authoriser, recommending a decision.

Abandoning the tender process – on very rare occasions, it may be necessary to halt the tender process. The tender documents should make it clear that we have the right to do so without any liability to the bidders. Should this occur, suppliers will be notified as soon as possible.

9 Waivers and Direct Award

In very limited circumstances, an exemption or waiver may be granted, but only where there is an exceptional reason not to follow the procurement procedures outlined in this policy. A waiver may include authority being granted to award a contract or place an order without obtaining the requisite number of tenders or quotations, or to directly award a contract. All waivers must be compliant with procurement legislation and therefore under no circumstances can a waiver be used where the value of the procurement exceeds the Procurement Act 2023 threshold for regulated procurement.

Any exemptions should only be relied upon with the express consent from the appropriate delegated authority and must be agreed with the CFO before any orders are placed.

10 Contract Management and Record Keeping

The Trust is subject to scrutiny by internal and external auditors, as well as the DfE. It is the responsibility of everyone involved in the procurement process to ensure compliance with all current legislation, policies and procedures. A clear audit trail must be maintained for all purchases, regardless of value, with the level of detail proportionate to the value of the procurement.

The procurement process should consider and document how the resulting contract will be managed to ensure it delivers the value intended, not just immediately following contract award, but for the full duration of the contract. Contracts should include clear performance measures and Key Performance Indicators (KPIs) and be regularly monitored. Once contracts are fully approved, they should be passed to the central Finance team to be entered onto the Trust's contracts list. The person responsible for the contract must ensure regular review meetings take place throughout the year, along with KPI monitoring.

Additional requirements apply for 'above threshold regulated procurement', such as placing relevant notices on the government's new Central Digital Platform (an enhancement of the previous Find a Tender Service). To avoid the inefficiency of annual re-procurement, the Central Team will work with schools to review procurement plans and develop multi-year contracts where appropriate.

Any contract extension or variation to be approved in line with the Trust's scheme of delegation must be discussed with the CFO/Finance Manager for guidance.

11 Conflicts of Interest

The DfE Academies Handbook puts strict obligations on the Trust to ensure that conflicts of interest in procurement are managed appropriately. Any interest which has the potential to affect the outcome of a procurement process must be declared to the CFO immediately, to allow appropriate mitigations to be put in place.

All Trustees are required to complete and regularly update the register of business interests. The DfE Academy Trust Handbook outlines specific rules regarding payments to individuals or organisations which are 'connected' to a Member or Trustee. In such instances, the CFO must be notified before engaging with these suppliers.

In accordance with the CLT Code of Conduct, no gifts or hospitality should be accepted from any service provider as an inducement to award a contract. Accepting such inducements may constitute an offence under the Bribery Act 2010. Any staff member who becomes aware of such gifts or hospitality must inform the CFO immediately.

12 Information Rights

CLT is committed to transparency and accountability in its procurement processes, in accordance with the Freedom of Information Act 2000. The Trust will ensure that all procurement activities are conducted openly, with information readily available to the public upon request, unless where exemptions apply under the Act. As part of the process for providing quotations and tenders, the Trust requires all bidders to identify confidential or commercially sensitive information which they wish to protect from disclosure in response to Freedom of Information requests.

The Trust is also dedicated to safeguarding personal data in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Throughout procurement activities, CLT will ensure that personal data is processed lawfully, fairly and transparently. Data collection is limited to what is necessary, maintained accurately, up-to-date and stored only for the required duration. Robust security measures are in place to protect against unauthorized access, loss or damage. All suppliers must adhere to these data protection standards.

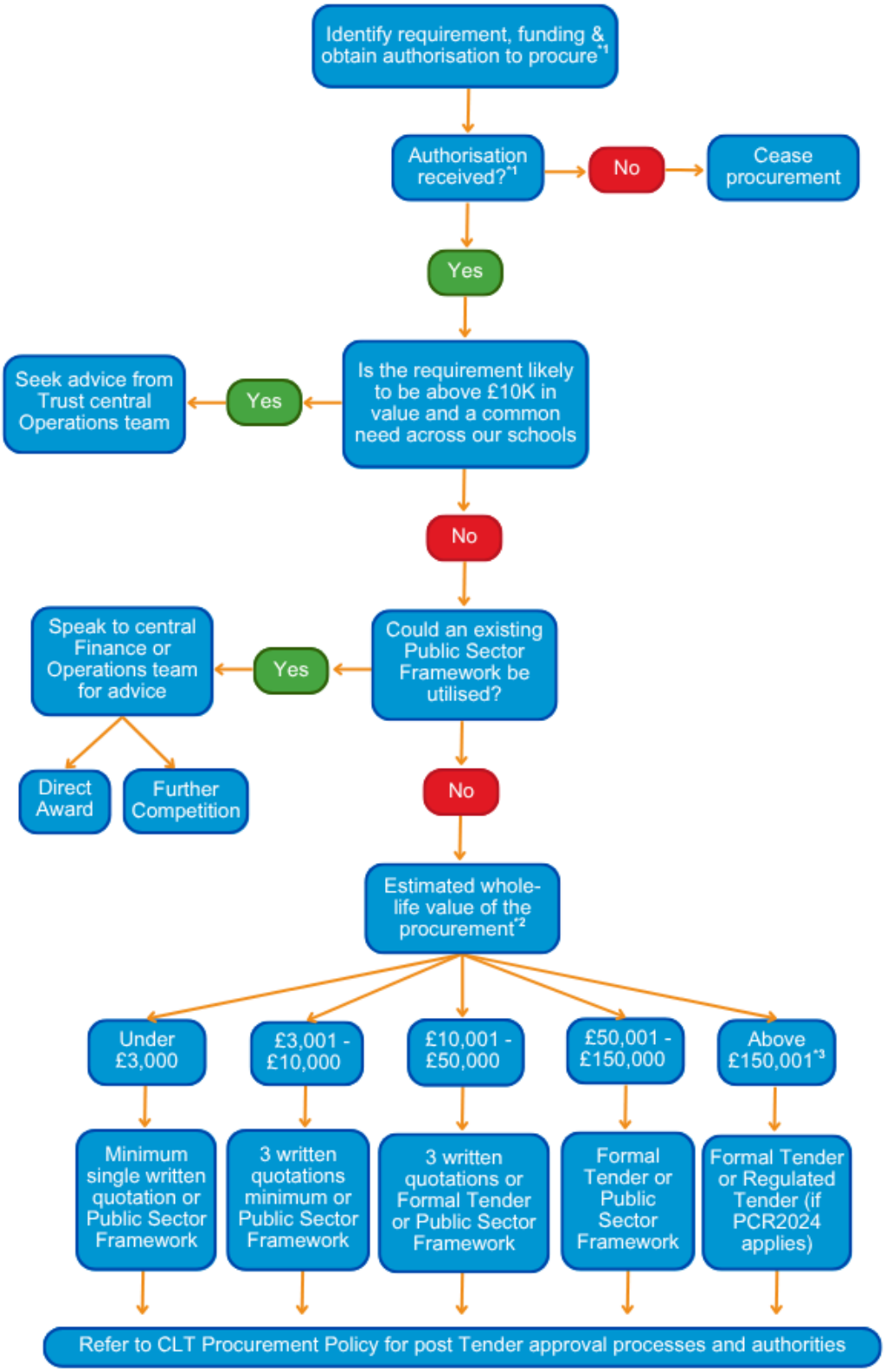
13 Policy Review

The CFO is responsible for the implementation of the Procurement policy. This policy will be reviewed annually to ensure its effectiveness and compliance with current legislation.

The central Finance team and Chief Operations Officer (COO) will be able to provide further support and advice on this policy.

Procurement Decision Tree

Appendix 1



Notes:
*1 see section 6 of the Procurement Policy.
*2 see section 5 of the Procurement Policy.
*3 if likely to exceed current Public Contracts Regulations 2024 threshold for contract type.