Procurement Policy

For the attention of: All Staff
Produced by: Group Director of Finance
Approved by: SLT/Board of Governors
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WINDSOR FOREST
COLLEGES GROUP

Vision, Purpose & Values

Our Vision

Our students will be recognised locally & nationally for their positive impact on the communities and industries in which they choose to work.

Our Purpose

To inspire our students to gain the skills, knowledge and behaviours they need to be resilient and thrive in an ever-changing world.

Our Values

Excellence: A culture of creativity, high expectations, ambition and aspiration

Respect: Showing fairness, courtesy and mutual respect to each other and our environment

Integrity: Honesty, openness and trust at the heart of College life

Diversity: Celebrating diversity and inclusivity as a key to our success

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1. Introduction/ Policy Statement

All funding received by Windsor Forest Colleges Group (WFCG), regardless of its source, is public money and is therefore subject to this policy. The Board of Governors may delegate financial power to commit the organisation to expenditure on their behalf in line with the Scheme of Delegation. The financial limits of such delegation are set out in the Board's Financial Regulations document, which must be reviewed at least annually.

These powers include separate authority to commit to expenditure and authority to certify/release purchase orders as well as, in specific areas, authority to negotiate on behalf of WFCG.

WFCG staff should exclude themselves from any procurement exercise involving a related party (such as a family member, close friend or business interest) after the specification stage of the process.

As an incorporated further education college group, WFCG enters into an Accountability Agreement with the Secretary of State for Education (acting through the Department for Education) each academic year. This agreement sets out the obligations of the College Group in return for receipt of public funding and replaces the earlier 'conditions of funding' framework that previously applied to FE colleges. All spending must be consistent with the purposes set out in that Accountability Agreement.

2. Commitment and Purpose

The Board of Governors is responsible for managing the financial resources allocated to the College Group and ensuring that all spending is for the purpose intended and as set out in the Accountability Agreement with the Department for Education.

This policy aims to ensure that:

- Value for money (economy, efficiency and effectiveness) is achieved.
- Conflicts of interest are managed adequately and appropriately.
- The College Group has open and transparent procurement procedures.
- WFCG staff are provided with information and guidance regarding effective and compliant procurement.
- Clear procedures are established for the procurement of goods and services, based on the expected value of a purchase.
- WFCG's scheme of delegation is set out for the approval of expenditure.

This policy includes procedures for open tenders. This approach allows anyone to submit a tender to supply goods or services required, and offers an equal opportunity to any organisation to submit a tender.

3. Sustainable Purchasing

Sustainability is an increasingly recognised and important aspect of procurement. The Procurement Act 2023 incorporates sustainability considerations, and WFCG is committed to environmentally and socially responsible purchasing practices. WFCG is also committed to improving its environmental best practice and building a social and economic legacy for its students and young people that supports sustainable growth.

Prior to any procurement, the following questions should be considered:

- Is the product or service necessary?
- Can the need be fulfilled in alternative ways?
- Is a more sustainable product or service available internally?

When acquiring goods and services, consideration must be given to the broader impact on the environment, society and the economy. Key aspects include:

Environmental Impact: Choosing products and services that minimise harm to the environment, such as those made from recycled materials or that use renewable energy sources.
Social Responsibility: Ensuring that procurement practices support fair labour practices, human rights and community well-being.
Economic Sustainability: Balancing cost-effectiveness with long-term economic benefits, such as supporting local businesses and sustainable supply chains.

We aim to ensure that all products and services are sourced in a way that is socially, economically and environmentally sustainable.

4. Legislation and Guidance

This policy is based on:

- The Procurement Act 2023.
- Department for Education (DfE) guidance on buying procedures and procurement law.
- The College Financial Handbook 2025 (effective from 1 August 2025), published by the Department for Education.

- The WFCG Financial Regulations.

5. Value for Money

Value for Money (VFM) is defined in the College Financial Handbook 2025 as achieving the best use of resources consistent with the requirements of regularity and propriety. The Handbook draws on HM Treasury's Managing Public Money and defines VFM through three complementary dimensions:

Economy: Reducing the cost of resources used for an activity, while maintaining quality.
Efficiency: Achieving maximum output for given inputs, or minimum inputs for a given output.
Effectiveness: Achieving the intended outcomes or objectives.
Note: The College Financial Handbook 2025 is the primary reference for VFM for FE colleges. It is the most appropriate and authoritative reference, being the DfE's own financial governance framework for the sector. Staff should be aware that some broader definitions of VFM also include 'Feasibility' (i.e. that a proposal can be implemented accurately and sustainably).
WFCG staff should endeavour to secure VFM by ensuring their purchases are:
Effective – staff must establish the required outcome of a procurement process, prior to embarking on that process, in order to identify the most appropriate goods or services to be obtained.
Economic – staff must secure the appropriate quality of goods and services whilst minimising the cost to WFCG. This is most clearly evidenced by obtaining a number of quotes.
Efficient – staff must consider the efficiency of their purchases and ensure efficient use is made of other WFCG resources such as staff time.

Budget holder approval must be sought in advance of entering into any procurement process.

6. Roles & Responsibilities

The Board of Governors
The Board of Governors will ensure that:

- The College Group achieves value for money.
- Relevant legal or professional advice (such as from an external auditor) is used, where appropriate.
- Any conflicts of interest that may arise are managed.

- A register of the up-to-date business and pecuniary interests of Governors, Committee Members, the Principal and any other senior employees is kept, helping to ensure the Board is transparent and open.
- Where any individual has a pecuniary interest in a procurement decision, they exclude themselves from the process and records (e.g. meeting minutes) show they had no influence on the decision.

The Principal and Chief Executive

The Principal and Chief Executive is responsible for:

- Supporting competitive tendering across the College Group.
- Providing information to the Board, as appropriate.
- Monitoring budgets.

7. Purchase Thresholds

Purchase Threshold Bands

Purchase levels are divided into the following bands (all values inclusive of VAT):

- De Minimis: up to £2,499
- Very Low: £2,500 – £9,999
- Low: £10,000 – £29,999
- Medium: £30,000 – £99,999
- High: £100,000 and above (but below the PA23 procurement threshold)

These thresholds take effect from 1 August 2026 and supersede all previous threshold tables. A single contract must not be divided into smaller contracts to bypass these thresholds.

8. Procurement Act 2023 Thresholds

Where it is estimated that the cost of a contract will reach or exceed the Procurement Act 2023 (PA23) threshold, WFCG will seek legal advice to ensure it runs a fully PA23-compliant buying process. The current thresholds (inclusive of VAT, effective from 1 January 2026) are set out below.

Category	Threshold (inc. VAT)	Requirement
Goods and most services	Above £207,720 (inc. VAT)	Full PA23-compliant tender process required

Category	Threshold (inc. VAT)	Requirement
Light touch regime (certain education services)	Above £663,540 (inc. VAT)	Legal advice to be sought to confirm eligibility
Works	Above £5,193,000 (inc. VAT)	Full PA23-compliant tender process required

A 'light touch regime', with a higher threshold, applies to certain services specifically for education provision. Legal advice will be sought to confirm whether any procurement qualifies for this regime.

9. Approval Authority

The table below sets out the delegated approval authority and the quotation or tendering process required at each contract value band. All values are inclusive of VAT. These limits are effective from 1 August 2026.

Contract Level	Contract Value (inc. VAT)	Delegated Authority	Quotations / Process	Notes
De Minimis	Up to £2,499	Department Managers (HoD)	Value for money check – no formal quotation required	
Very Low	£2,500 – £9,999	Assistant Principals / Curriculum Directors	2 written quotes (or Framework)	
Low	£10,000 – £29,999	Group Finance Director / Exec Leads	3 written quotes (or Framework / preferred suppliers)	
Medium	£30,000 – £99,999	Group Finance Director	Framework, preferred supplier, or single source waiver (with approval)	All contracts above £30,000 added to the contract register
High	£100,000 – £207,719	Group Principal & CEO (on behalf of Board)	Full tendering process – see section below	Reported to Resources Committee for noting

Reporting Requirements

Higher-value contracts require additional reporting and approval as set out below.

Contract Value	Approval Required	Notes
£100,000 – £199,999	Group Principal & CEO approval	Noted retrospectively by Resources Committee
£200,000 – £499,999	Resources Committee approval	
£500,000 and above	Corporation (Board of Governors) approval	
Above £750,000 (major capital)	Corporation approval	Post-project evaluation report required to Board

10. Single Source Waivers

Single-source procurement (i.e. procurement without competitive tendering) is only permitted where it is justified and formally approved. The justification must be documented. The approval authority for single-source waivers is as follows:

Value Limit	Authorising Body
Up to £25,000	Group Finance Director
Up to £50,000	Group Principal & CEO
Above £50,000	Resources Committee or Corporation approval required

Above these limits, committee or Corporation approval is required. Single-source waivers must never be used to routinely circumvent competitive tendering requirements.

11. Framework Agreements and Dynamic Purchasing Systems

Where possible, WFCG will use a framework agreement or a dynamic purchasing system (DPS) to contract suppliers. These are arrangements that a contracting authority, such as a public sector buying organisation, makes with suppliers. The benefits of frameworks are that they have already been through a competitive tender process and carry favourable terms and conditions. In addition, the framework provider may offer advice and support.

Depending on the framework chosen, WFCG will either select the best-value supplier from a list or run a mini-competition between listed suppliers. In either case, WFCG will follow DfE guidance on procurement to ensure good practice. The reasons for the choice of framework, and for the choice of supplier, will be clearly recorded.

12. Contract Value Determination

The value of a contract will be 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 value of the contract will be the price of the fixed term plus the potential extension period.

A single contract must not be divided into smaller contracts to bypass the purchase thresholds set out in this policy.

13. Tender Evaluation

Tenders will be evaluated against the criteria and weightings outlined in the tender document. These criteria will include:

- Cost and price stability
- Quality
- Delivery
- Performance
- Value added
- Staff wellbeing
- Social value and sustainability
- Risk

WFCG may specify additional criteria based on the type of tender, as outlined in the tender document.

14. Tendering Procedure: Low and Medium-Value Purchases

When making low or medium-value purchases (£10,000 – £99,999) without a framework agreement, WFCG will use the process outlined below.

Create a specification – a specification document will set out what suppliers need to understand about what WFCG is looking to buy, including the quality, quantity and delivery date. A specification must be authorised by the end user or Subject Matter Expert. For major building works, the services of an architect would typically be engaged to handle specifications.

Compare suppliers – a comparison of different suppliers, including their reputation, will help to develop a shortlist of at least three suppliers to approach for a written quote.

Assess quotes – an award-criteria framework will be developed to assess suppliers' quotes. Criteria may include:

- How well the supplier meets the specification.
- The whole-life cost of the contract (sale price, VAT, delivery charges, maintenance costs, running costs and disposal costs).
- Whether there will be price increases or decreases over the life of the contract.
- Value for money overall.

Each aspect of the criteria will be scored on a pre-agreed scale from low to high, and a record of how quotes are evaluated will be kept. Appointed staff members (including Governors, where applicable) will evaluate quotes with support from the Subject Matter Expert(s) and Procurement Lead.

Place an order – when the best-value quote is identified, WFCG will send the supplier a purchase order, including details of the goods/works/services, price, delivery address, delivery deadline and payment schedule.

15. Tendering Procedure: High-Value Purchases

WFCG will make high-value purchases (£100,000 and above) without a framework only in rare circumstances and with legal support. When this is necessary, the following process will be followed.

Create a specification.

Assess the market – prepare for the tendering process by developing knowledge of the market, including the number of suppliers available and the best way to advertise the contract.

Check the College Group's position in relation to PA23 procurement thresholds – refer to Section 8 above.

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

Reduce the number of bids – use an expression of interest process or a pre-qualification questionnaire to focus evaluation effort.

Establish evaluation criteria – set out criteria that identify the most economically advantageous tender, combining price, quality and value for money.

Create a timeline – include clarification period dates, the tender submission deadline and the expected contract award date.

Prepare an invitation to tender (ITT) – the ITT will include a covering letter with timeline, instructions for clarification questions, the specification, a pricing schedule, terms and conditions, contract management requirements, and the award criteria including scoring system and weightings.

Advertise the contract – the contract will be advertised where suppliers are likely to look, such as:

- The Find a Tender service (mandatory for contracts above the PA23 threshold).
- The government's Contracts Finder service.
- Local or national newspapers.
- Education publications or websites.
- Trade magazines.

Run the tender process and provide clarifications.

Evaluate tender responses – at least three people will independently score and evaluate each bid, then compare notes after completing their evaluations. Records of decision-making and moderation will be kept. The evaluation team members should have detailed knowledge of the specification and the key objectives of the tender. The composition of the evaluation team must be agreed by the Chief Finance Officer.

Notify bidders – WFCG will inform both the successful and unsuccessful bidders at the same time.

Challenges from unsuccessful bidders – if an unsuccessful bidder challenges the fairness of the process, WFCG will contact them to explain the fair and well-documented process followed. If a formal challenge is made, WFCG will not formalise the contract and will seek legal advice.

Finalise the contract (if there are no legal challenges) and advertise the award where required.

Abandoning the tender process – on rare occasions, WFCG may need to halt the tender process. Tender documents should make clear that WFCG reserves the right to do so without liability to bidders. Suppliers preparing bids will be notified as soon as possible.

16. Contract Management

Contracts must be actively managed, monitored and stored. Performance must be reviewed regularly. All contracts above £30,000 must be included in the contract register, as required by the WFCG Financial Regulations. This register will be reported to the Resources Committee on an annual basis. Contract management ensures consistency and accountability across the College Group.

17. Record Keeping

Records will be kept securely, only for as long as necessary, and in line with data protection law, WFCG's privacy notices and the data retention policy. Procurement documentation must be retained in accordance with the College Group's retention schedules and the College Financial Handbook 2025. All records must be stored securely and handled in compliance with UK GDPR.

18. Monitoring Arrangements

The Principal and Chief Executive, Group Finance Director and all Budget Holders are responsible for the implementation of this policy.

Where expenditure is not included in the budget, or where anticipated expenditure exceeds the budget allocation, the decision as to which tender to accept will be taken by the Finance and Resources Committee, in line with their terms of reference, and then ratified by the Board of Governors.

This policy will be reviewed and approved by the Corporation Board every two years and whenever PA23 procurement thresholds change.

19. Associated Documents

- WFCG Financial Regulations
- College Financial Handbook 2025 (Department for Education)
- Procurement Act 2023
- DfE guidance on buying procedures and procurement law
- DfE Accountability Agreement (Colleges) 2026–2027