



UK COLLEGE OF BUSINESS AND COMPUTING

Procurement Policy

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Author:	Finance Manager
Policy Owner:	Chief Operating Officer
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Responsible Committee:	College Management Team (CMT)
Approved by and date:	College Management Team (CMT) – 23 October 2026
External reference points:	OfS Condition of Registration E2 (management and governance) and the Public Interest Governance Principles, including value for money; OfS initial condition E8 (fraud and inappropriate use of public funds); OfS Condition D (financial viability and sustainability); Bribery Act 2010; Modern Slavery Act 2015; Data Protection Act 2018 and UK GDPR
Linked policies:	GA 3.3 UKCBC Corporate and Academic Governance Framework (including Appendix 4, Scheme of Delegation); GA 3.4 Conflicts of Interest Policy; GA 3.5 Anti-Fraud, Bribery and Corruption Policy; GA 3.6 Whistleblowing and Public Interest Disclosure Policy; GA 3.2 Risk Management Framework; DIG 2.1 Data Protection and Confidentiality Policy; DIG 2.6 Information Security and Acceptable Use Policy; Business Case – Procurement and Spend Request Form
Audience:	All staff who request, approve or manage the purchase of goods, services, works or systems on behalf of the College

1. Purpose

This policy sets out how the UK College of Business and Computing (UKCBC), referred to in this policy as the College, purchases goods, services, works and systems. It establishes the principles, approval routes, competition requirements and controls that apply to all College expenditure on third party suppliers.

The policy exists to secure value for money, to protect the College and its staff from the risks of fraud, bribery, conflicts of interest and supplier failure, and to provide the Board of Governors with assurance that resources are applied efficiently and in the interests of students. It supports the College's obligations under OfS Condition E2 and the Public Interest Governance Principles, under which the governing body must ensure that value for money is delivered, and under OfS initial condition E8, which requires comprehensive arrangements to prevent, detect and stop fraud and the inappropriate use of public funds.

2. Scope

This policy applies to all purchases of goods, services, works and systems made by or on behalf of the College, whatever the funding source, including one off purchases, contract renewals, subscriptions, consultancy and temporary agency staff. It applies to all staff, in every department and at every level of seniority.

The following are outside the scope of this policy: salaries and payroll administered through People and Culture; fees payable to awarding body partners under validated or franchise agreements, which are governed by the relevant partnership agreement; and taxes, levies and regulatory fees. Expense claims by staff are governed by the College's expenses arrangements, though the principles of value for money and probity in this policy apply equally to them.

3. Definitions

Term	Meaning
Procurement	The whole process of acquiring goods, services, works or systems from a third party, from identifying the need through to contract award, delivery and payment.
Total contract value	The full value of the commitment over its whole life, including renewals, options to extend and recurring charges, not the annual or instalment value. Value added tax is excluded.
Budget holder	A member of staff with delegated responsibility for a budget line under the Scheme of Delegation.
Spend Request	A request for expenditure submitted on the Business Case – Procurement and Spend Request Form.
Direct award	The appointment of a supplier without competition, permitted only in the circumstances set out in Section 9.
Disaggregation	Splitting a purchase into smaller parts so that each falls below an approval or competition threshold. Disaggregation is prohibited.

4. Policy statement and principles

All procurement by the College is conducted in accordance with the following principles.

- Value for money. Purchasing decisions weigh economy, efficiency and effectiveness over the whole life of the commitment, not simply the lowest price. Quality, reliability, sustainability and total cost of ownership are considered alongside cost.
- Probity and integrity. Staff act honestly and impartially, declare conflicts of interest in accordance with GA 3.4, and never solicit or accept gifts, hospitality or inducements that could influence, or appear to influence, a purchasing decision, in accordance with GA 3.5.
- Fair and open competition. Suppliers are treated equitably and competition is sought in proportion to the value and risk of the purchase.
- Transparency and accountability. Decisions are documented, approvals are evidenced, and expenditure can be traced from the identified need to the paid invoice.
- Proportionality. The procurement process is proportionate to the value, risk and complexity of the purchase, so that controls protect the College without creating unnecessary administration.
- Legal and ethical compliance. The College complies with the Bribery Act 2010 and the Modern Slavery Act 2015, and expects its suppliers to do the same.

5. Roles and responsibilities

5.1 Board of Governors

The Board of Governors holds ultimate accountability for the stewardship of College resources and receives assurance on value for money and financial controls through the Audit and Risk Committee and the Finance Committee, in accordance with GA 3.3.

5.2 Chief Operating Officer

The Chief Operating Officer owns this policy, holds delegated authority for procurement and operational contracts under Appendix 4 of GA 3.3, and is accountable to the Executive Leadership Team for the effective operation of the procurement controls it describes.

5.3 Finance Manager

The Finance Manager administers the procurement process: maintaining the supplier records and contracts register, checking that Spend Requests are complete and correctly authorised before orders are placed, raising purchase orders, processing invoices against approved orders, and reporting procurement activity and exceptions to the Finance Operations Committee.

5.4 Operations Committee

The Operations Committee considers Spend Requests submitted on the Business Case – Procurement and Spend Request Form, tests the business justification, options and costings, and confirms whether the request should proceed to budget approval.

5.5 Budget holders and requesting staff

Budget holders confirm that proposed expenditure is within budget and consistent with departmental plans. Staff requesting a purchase are responsible for completing the Spend Request honestly and completely, obtaining the required quotations, and declaring any connection with a proposed supplier.

6. Delegated financial authority

Financial approval authority is set by Appendix 4 (Scheme of Delegation) of GA 3.3, which takes precedence over this policy if the two differ. The limits relevant to procurement are summarised below.

Commitment	Limit	Authority
Expenditure within an approved budget line	Below £100,000	Budget holder
Procurement and operational contracts; estates and facilities; IT and systems; operational service contracts	Up to £750,000	Chief Operating Officer
Academic related contracts and services	Up to £750,000	Chief Academic Officer
Contracts above £750,000	Above £750,000	Chief Executive Officer, with escalation to the Board of Governors where required by GA 3.3

Approval authority applies to the total contract value. No purchase may be disaggregated to bring it within a lower limit.

7. The Spend Request process

All proposed expenditure with a total contract value of £5,000 or above is initiated through the Business Case – Procurement and Spend Request Form, matching the level at which Section 8 requires three written quotations or a competitive tender. The form records the need being met, the expected benefits, the alternatives considered, the impact of not proceeding, the cost breakdown and the proposed procurement route. Purchases below £5,000 do not require a form: they are approved by the budget holder within the delegated limits in Section 6, supported by the quotations Section 8 requires and a purchase order raised before supply.

The completed form is submitted to the Operations Committee for consideration. Where the Committee supports the request, budget approval is confirmed by the presenting member of the Executive Leadership Team within their delegated authority. Once approved, the Finance Manager raises a purchase order, and the purchase order number, supplier and final approved value are recorded on the form as the post approval record. No commitment may be made to a supplier, verbally or in writing, before these approvals are complete.

8. Competition requirements

Competition is sought in proportion to the total contract value. The following thresholds apply and are proposed for confirmation by CMT at approval.

Total contract value	Minimum competition requirement
Up to £1,000	One quotation. The requester confirms the price is reasonable.
£1,000 to £5,000	Two written quotations.
£5,000 to £25,000	Three written quotations, evaluated on value for money and recorded with the Spend Request.
Above £25,000	Competitive tender: a written specification, invitations to at least three suppliers, evaluation against published criteria by at least two staff, and a written award recommendation.

Quotations and tenders are evaluated on value for money over the life of the contract. The evaluation and the reasons for the award decision are recorded and retained with the Spend Request.

9. Direct awards and waivers

A purchase may proceed without the competition required by Section 8 only where one of the following applies and a waiver is approved in writing by the Chief Operating Officer (or, for academic related contracts, the Chief Academic Officer) before any commitment is made: the goods or services are available from only one supplier for genuine technical or proprietary reasons; the purchase is a compatible extension of an existing contract where a change of supplier would cause disproportionate cost or disruption; genuine unforeseeable urgency, not caused by a lack of planning, makes competition impracticable; or the purchase is a renewal of an existing system or subscription where the Spend Request demonstrates that renewal remains value for money.

Every waiver is recorded with its justification in the waiver log maintained by the Finance Manager and reported to the Finance Operations Committee. Waivers above £25,000 are also reported to the Audit and Risk Committee.

10. Contracts and purchase orders

All purchases are supported by a purchase order raised before the goods or services are supplied. Contracts are in writing, entered into in the name of the College, and signed only by those with authority under the Scheme of Delegation. Contract terms are reviewed before signature for renewal and termination provisions, price variation mechanisms, liability, data protection and exit arrangements. Automatic renewal clauses are identified at the outset and diarised so that renewals return through the Spend Request process in good time.

The Finance Manager maintains a contracts register recording the supplier, subject matter, value, start and end dates, renewal dates and contract owner for every contract above £5,000.

11. Conflicts of interest, gifts and hospitality

Any member of staff with a personal, family, financial or other connection to an actual or potential supplier must declare it under GA 3.4 before taking any part in the specification, evaluation or approval of the purchase, and must withdraw from the decision. Gifts, hospitality and inducements offered by suppliers or prospective suppliers are governed by GA 3.5; anything beyond trivial hospitality must be declined or declared. Suspected fraud, bribery or corruption in procurement must be reported immediately under GA 3.5, and concerns may also be raised under GA 3.6.

12. Ethical procurement, modern slavery and sustainability

The College will not knowingly contract with suppliers who use forced, bonded or child labour, or who breach fundamental employment, health and safety or environmental standards. Proportionate due diligence is applied before supplier onboarding, including, for significant contracts, confirmation of the supplier's approach to the Modern Slavery Act 2015. Environmental impact and sustainability are considered in specifications and evaluations where relevant, including energy consumption, waste and the whole life cost of equipment.

13. Supplier due diligence and data protection

Before a new supplier is onboarded, the Finance Manager verifies the supplier's identity, bank details and standing, proportionate to the value and risk of the contract. Changes to supplier bank details are verified directly with a known contact at the supplier before payment records are amended, in line with GA 3.5 fraud controls. Where a supplier will process personal data on behalf of the College, the contract must include data processing terms meeting the requirements of UK GDPR, and the arrangement is assessed under DIG 2.1 before award.

14. Records and audit

Spend Requests, quotations, tender documents, evaluations, waivers, contracts and purchase orders are retained in accordance with DIG 2.4 Records Management and Data Retention Policy, and are available for inspection by internal and external audit and by regulators. The procurement process and a sample of transactions are reviewed periodically through the College's internal assurance arrangements, with findings reported to the Audit and Risk Committee.

15. Monitoring and review

The Chief Operating Officer monitors the operation of this policy. The Finance Operations Committee receives regular reporting on procurement activity, waivers and exceptions, and the Executive Leadership Team receives an annual summary of procurement value for money. The policy is reviewed at least every two years, or earlier where regulation, the Scheme of Delegation or College structures change.

16. What this means for you

If you need to buy something for the College: check your authority and budget, complete the Business Case – Procurement and Spend Request Form where the value is £5,000 or above, obtain the quotations the value requires, declare any connection you have with a supplier, and wait for the purchase order before committing. If you are unsure at any point, ask the Finance Manager before you act. Committing the College without approval, splitting purchases to avoid thresholds, or accepting inducements from suppliers are serious matters that may be treated as misconduct.

Version History

Version	Date	Author	Summary of changes	Approved by
1.0	23 October 2026	Finance Manager	Initial version.	College Management Team (CMT)