**Procurement Policy**

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| **Version number** | **Date approved (including committee)** | **Reason for production/revision** | **Author** | **Proposed next review date**  |
| V1.0 | February 2022 | Initial Policy Driven by the initiation of the (FR Framework)  | Jenny Marzano | February 2023 |
| **Related policies**  |
| * Corporate Criminal Offences Policy
* ABC Policy (Anti Bribery and Corruption)
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| **External Reference**  |
| 1. HEPA (Higher Education Procurement Association) Paper on Factors to achieve effective procurement. - An appropriately adapted repertoire of recommended principles to achieve the best procurement in higher education.
2. Criminal Finance Act 2017
3. The Bribery Act 2010
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1. **Policy Statement**

The overriding procurement policy requirement is that all ICMP procurement must be based on our ‘value for money’ principles and reflect the three E’s (Efficiency, Effectiveness and Economy). This can be defined as “the best mix of quality and effectiveness for the least outlay but considering optimal efficiencies over the period of use for the goods or services bought.”

This will be achieved through a combination of competition and multiple quotes, unless there are compelling reasons to the contrary, and purchasing competence demonstrated by budget heads (‘buyers’).

Buyers will assess the value to the ICMP outside of just economic reward alongside considering the right quality, right quantity, and right timing to acquire.

1. **Purpose**
	1. This policy sets out the principles and reference procedure which ICMP will apply to purchase the goods and services which aid its business operation.
	2. **Promoting good procurement practices through**:
		1. The application of an authorisation and responsibility hierarchy (Table 1) *-* enabling only budget heads and delegated individuals to commit the business to approved expenditure and to be responsible for ensuring good procurement practices.
		2. The use of the Purchase Order (PO) system - this provides a clear and guided sign-off process for any subordinate who may order a good or service. Before the expenditure is authorised it is the responsibility of the buyer to ensure that this policy has been followed. In an instance where a PO generation is not possible, the same principles will apply, only to be replaced with physical or electronic signatories.
		3. The raising of awareness through the provision of mandatory training regarding the relevant areas of legal compliance and with reference to ICMP’s Anti-Bribery and Corruption (ABC Policy) and the Criminal Finance Act 2017. ().
		4. Consideration of the ICMP ‘6-point procurement principles’:

			1. **1. Relationship** – Procurement requires building good relationships with suppliers and stakeholders and understanding who knows the market. Buyers understand that they must declare all related party transactions.
			2. **2. Negotiation** - Buyers always drive excellent value for money (VFM).
			3. **3. Knowledge** - Promoting budget heads to only purchase in their own areas of interest and expertise, ensuring sound knowledge behind the acquisition.
			4. **4. Competition** – Buyers ensure the appropriate level of competition, quotes and or tenders for procurement
			5. **5. Communication** – Ensuring that the ‘buyer’ has the correct instructions and brief and knowledge of the appropriate budget.
			6. **6. Society and the Environment -** Procurement is in alignment with ICMP corporate strategy regarding societal and environmental outputs. Buyers understand that sustainability and environmental impact must be a serious and key consideration in the way and what we purchase.
2. **Scope**

This policy applies to any ICMP employee who is responsible for and authorised to commit the business to any form of expenditure. This will include but not be limited to supplies, capital equipment and general expenditure

1. **Roles and Responsibilities**
	1. The following table demonstrates the key roles that have responsibility for the business and respective operational areas of spend.
	2. Level 1 ‘buyers’ will be responsible for the training and competence of their level 2 and 3 subordinates to ensure efficient, effective and economic procurement.

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| **ICMP** |  |  | Table 1 |
| **Procurement Authorisation** |  |  |  |
|  |  |  |  |
| **Budget Area of Spend** | **Overall Responsibility Level 1**  |  **'Budget Head' 'Buyer'****Level 2** | **Dedicated Alternate 'Buyer'****Level 3** |
| Non-Accredited Learning (NAC) | Business Development Director | Pete Whittard | Tony Garston |
| General Capital Expenditure | Business Development Director | Chris Catchpole |  |
| Business Development Projects | Business Development Director | Pete Whittard | Jenny Marzano/ Chris Catchpole |
| Management (MAN) | Chief Executive Officer | Paul Kirkham | Jenny Marzano |
| Human Resources (HR) | Chief Executive Officer | Olivia Besly |  |
| Other Balance Sheet Expenditure | Chief Executive Officer | Paul Kirkham |  |
| Facilities (FAC) | Chief Operating Officer  | Chris Catchpole | Damien Omen |
| Admissions (ADM) | Chief Operating Officer  | David Essien | Darren Suckling |
| Academic Support (ADS) | Chief Operating Officer  | Stef Jones | Emma Lobb |
| Student Services (S+S) | Chief Operating Officer  | Angela Morley |  |
| Registry (DAT) | Chief Operating Officer  | Stef Jones | Melissa Cadby |
| Industry and Careers (I+C) | Chief Operating Officer  | James Brister  | Oliver Tatler |
| Access and Participation (APP) | Chief Operating Officer  | Hannah Trott | Terri Cash |
| Information Technology (IT) | Chief Operating Officer  | Chris Catchpole | John Macdonald |
| Finance (FIN) | Finance Director | Linda Ashong | Gavin Clarke |
| Marketing (MKT) | Marketing Director | Steve Dunhill  | Lisa Wadham |
| Education (EDU) | The Dean and Director | Jonathan Whiskerd, Lucy Bernstien | All PL's for their own programme delivery |

Table 2

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **< £1,000** | **> £5,000 < £10,000** | **> £10,000** | **Commitments more than £50K** |
| Authorised Signatories | Single L1, L2, L3 | Single L1, L2 | Single L1 | Double L1 |
| Quotes required | N/A | 3 | 3 | 3 |
| Bids written | N/A | N/A | Yes  | Yes |

* 1. All employees that require a product or service must complete a Purchase Order (PO) requisition prior to approval and commitment of expenditure. Any employee is authorised to do this.
	2. Where a purchase order requisition is not possible, for example an expense claim, the employee must continue to follow the authorisation processes as detailed in table 1 and table 2 of this document, in order to claim a refund.
	3. All level 1 2 and 3 buyers are responsible for authorising the expenditure in accordance with table 2 where practical.
	4. All level 1 signatories may sign off any expenditure for any business area but are encouraged to restrict activity to areas indicated in Table 1. Level 2 and 3 buyers must adhere to areas outlined in Table 1 by way of authorisation. This will ensure we are following ICMP procurement principle 3.
	5. Where expenditure exceeds £5,000 the buyer must have obtained and considered three written or verbal quotes (where possible) before issuing the PO.
	6. Buyers should not recommend or use a known service or supplier that is assessed to not have reasonable preventative measures in place with regards to the facilitation of tax evasion). Buyers should ask to see company policy if in doubt.

For commitments that are related in total to a project more than £50k the following process should be used

* 1. Detail the scope clearly,
	2. Identify qualified suppliers and present a short list for review to a panel who will consider the ICMP’s procurement policy and principles in its decision-making process.
	3. Negotiate the best value from a selected supplier or contractor
	Present the final contract cost to ExCo for approval and inclusion into budget expenditure
	4. Signatories of that project spend should be authorised in accordance with table 2.
1. **Code of conduct**
	1. All employees are expected to conduct themselves in a professional and ethical manner, maintaining high standards of integrity and transparency with both internal and external stakeholders.
2. **Definitions**
	1. ‘ABC’ – Anti Bribery and Corruption
	2. ‘Budget Head’ - ICMP delegate in charge of managing the costs and expenditure of a designated departmental area of the business.
	3. ‘Buyers’ - Level 1, 2 or 3 authorised employees of ICMP in charge of committing the business to a budgeted expenditure.
	4. ‘CCO’ - Corporate Criminal Offences
	5. ‘PO’ - Purchase Order
3. **Monitoring and Review**
	1. This policy will be reviewed in accordance with the ICMP annual policy review.