



## PROCUREMENT AND PURCHASING POLICY

### 1. OVERVIEW AND PURPOSE

- 1.1 This policy sets out how the University buys goods, services, and works to achieve the best possible value for money from University funds.
- 1.2 The Policy sets out the rules and expectations that are in place to ensure the requirements of the Financial Regulations are met, along with the University's external regulatory obligations. As a key financial policy, it forms a core part of the "financial framework" (Financial Regulations, financial policies and financial systems).
- 1.3 The associated processes and procedures which are linked at the end of this policy should be considered alongside it and must be adhered to in order to ensure compliance with this policy.

### 2. SCOPE

- 2.1 This policy applies to all University staff (and anyone authorised to purchase on our behalf), all funds and all subsidiaries, majority controlled associated undertakings, and joint ventures of the University, unless they have an equivalent policy in place (as assessed by the University's General Counsel, Governance and Compliance division) that has been approved through its own governance structure.
- 2.2 Direct employment of staff is excluded; engagement of workers via agencies, consultancies or Personal Service Companies is in scope (subject to Off-Payroll/IR35).
- 2.3 For the purposes of this policy, 'University staff' includes the following, whether remunerated or not:
  - Senior managers, officers, and directors;
  - Employees (whether permanent, fixed-term, temporary, or casual);
  - Contract, seconded, and agency staff;
  - Volunteers, apprentices, and interns; and
  - Others associated with (i.e. performing services for or on behalf of) the University (for example, agents and consultants) – and any other individual authorised to undertake purchasing activity on behalf of the University.

### 3. RESPONSIBILITIES

#### 3.1 Chief Financial Officer

- 3.1.1 The Chief Financial Officer (or their nominee) is responsible for considering all exceptions to the terms of this Policy, and for approving these where there is a demonstrable business need.

### **3.2 Executive Deans and Directors of Professional Services ('PS Directors')**

- 3.2.1 Executive Deans and Directors of Professional Service are responsible for compliance with this policy in their areas, and for ensuring that those acting under this policy (for whom they have management or contractual responsibility) are appropriately trained and made aware of their obligations.
- 3.2.2 Executive Deans and PS Directors are responsible for the oversight of contracts and their management within their areas of responsibility, unless other specific contract governance has been put in place.

### **3.3 Budget Holders**

- 3.3.1 The term "Budget Holders" refers to University Executive Officers, Executive Deans, Directors of Professional Services, and any other individual acting under delegated authority to authorise expenditure by an Executive Dean or Executive Director of Professional Services.
- 3.3.2 Budget holders must ensure that sufficient funds are available and value for money has been achieved before approving any expenditure for goods, services or works.

### **3.4 The Finance division**

- 3.4.1 The Finance division provides advice and support for all purchasing/ procurement activity at the University.
- 3.4.2 The Strategic Procurement team must be engaged at the earliest planning stages for any requirement that may exceed £50,000 (including VAT) over its lifetime.

### **3.5 All staff**

- 3.5.1 All staff must ensure that they follow the requirements of this policy, the Financial Regulations and associated processes and procedures when undertaking purchasing activity or claiming expenses.
- 3.5.2 All staff are responsible for ensuring that their purchases provide good value for money for the University.
- 3.5.3 All staff must ensure that appropriate approvals are in place before committing the University to any expenditure for goods, services or works.

### **3.6 Delegation**

- 3.6.1 While purchasing responsibilities, including approvals may be delegated, overall accountability remains with Budget holders who must ensure that the requirements of this policy are met.

## **4. POLICY**

### **4.1 Value for Money ('VFM')**

- 4.1.1 The University aims to achieve value for money in all its activities through maximising the economy, efficiency and effectiveness of the goods, services and works it purchases.
- 4.1.2 Achieving VFM requires judgements to be made which balance the benefits derived from goods, services and works against the total cost of buying and using them. These total costs of ownership include the purchase cost, maintenance, running costs (including staff resource required), and any costs of disposal, as well as the cost of the buying process itself. Therefore, VFM is not always achieved by purchasing the 'cheapest' product or service.
- 4.1.3 As well as ensuring VFM is achieved at the point of purchase for any given goods, services or works, it is vital for ongoing requirements to ensure that the provision continues to deliver VFM throughout its duration through robust contract management.

#### 4.2 **Where to purchase goods, services and works**

- 4.2.1 The first step in achieving VFM is to identify the right supply route for goods or services. These routes are defined in Purchasing Procedure 1 – Finding the Right Supplier.
- 4.2.2 The University has arrangements in place with selected suppliers:
  - (i) Contracted Suppliers – the University maintains a number of contracted suppliers, appointed through competitive tender, to provide specific goods, services, or works. These suppliers should be used wherever possible.
  - (ii) Approved Suppliers – the University also maintains a list of approved suppliers, who, whilst not under contract, have successfully passed due diligence checks to confirm their suitability to supply the University and should be considered before engaging a new supplier.

#### 4.3 **Mechanisms for purchasing goods, services and works**

- 4.3.1 **Purchase orders** are raised using the finance system and are the principal mechanism for the purchase of goods, services, and works at the University.
- 4.3.2 The University operates a 'no PO, no pay' policy, which means that no invoice will be paid unless it can be matched against a valid purchase order, which has been 'goods receipted' (to confirm that the order has been fulfilled).
- 4.3.3 **University purchasing cards** are permitted for low value (i.e. below £5,000 including VAT) and/or one-off requirements, or where suppliers only accept card payments.
- 4.3.4 Purchasing cards should never be used if the payment relates in any way to Off-Payroll Working
- 4.3.5 **Out of pocket expenses** (i.e. the upfront purchasing of goods and services using an individual's own funds) are permitted only where the individual:

- does not have access to the University's finance system or a purchasing card in their own name or by a member of staff with authority to purchase on their behalf; and/or
- is required to use personal assets for business purposes, such as personal vehicle usage.

4.3.6 Detailed information on when to use each purchasing mechanism, along with key considerations, is included within the University's Purchasing Procedures.

#### 4.4 Principles of procurement

4.4.1 Procurement activity for new requirements must be conducted using a competitive process wherever possible to increase quality, reduce prices, and introduce innovation into the goods, services and works procured by the University.

4.4.2 The University conducts its procurement activity in line with the Procurement Act 2023.

4.4.3 Statutory Procurement thresholds vary depending on the type of requirement and may change from time to time. The Strategic Procurement team will advise on the relevant threshold and appropriate action as a result. The threshold to engage the Strategic Procurement team will always be below these thresholds and is detailed in Purchasing Procedure 1 – Finding the Right Supplier.

4.4.5 Requirements must not be split to avoid procurement thresholds.

4.4.6 The procurement approach and subsequent contract management will be proportionate to the value and risk of the requirement.

4.4.7 Weighting should be given to both cost and quality, regardless of the scale of the purchase, when evaluating quotations or proposals from suppliers. The term 'quality' includes the following considerations:

- conformance to specification
- environmental / sustainability considerations
- risk management
- delivery (time / location / method / etc.)

#### 4.5 Sustainable procurement & social value

4.5.1 Wherever possible, the University will integrate environmental sustainability, social value and ethical supply chain standards into specifications, evaluation, contract clauses and key performance indicators ('KPIs').

4.5.2 As a minimum, all relevant procurement activity will:

- (i) consider whole-life carbon and circular economy (repair/re-use);
- (ii) require compliance with our Supplier Code of Conduct and Modern Slavery commitments; and

(iii) include proportionate social value elements.

4.5.3 The University will meet or exceed sector best practice wherever possible through use of its Ethical Procurement Framework.

#### 4.6 **Contract Approval**

4.6.1 Contracts must not be signed or committed to without appropriate authorisation.

4.6.1 Purchasing Procedure 8 – Contract Approval details the correct route for all contract approvals.

#### 4.7 **Contract Management**

4.7.1 Effective contract management ensures that agreements deliver the intended value throughout their lifecycle.

4.7.2 Every contract must have a designated owner from within the relevant business area responsible for monitoring performance, managing risks, and maintaining compliance with agreed terms.

4.7.3 The Contract Management team will provide advice and commercial support proportionate to the contract's value and risk profile.

4.7.4 Contract Management activities should be proportionate to the contract's value, complexity, and risk, and include regular reviews, clear KPIs, and documentation of any variations.

4.7.5 Specific processes are detailed within purchasing procedure 6 – Contract Management.

#### 4.8 **Sanctions, embargoes, and restrictions**

4.8.1 Transactions that may be subject to sanctions, embargoes and restrictions must comply with the University's Sanctions Policy.

4.8.2 The inclusion of terms in a contract that bind the University to apply sanctions must comply with the University's Sanctions Policy.

4.8.3 Information on sanctions can be found on the Finance website at <https://www.sussex.ac.uk/finance/how/sanctions>

#### 4.9 **Ethical obligations / considerations**

4.9.1 All staff involved in any way in the purchasing process must adhere to the University's rules on gifts and hospitality, as set out in the University's Anti-Bribery Policy.

4.9.2 Staff who are engaged in purchasing decisions, e.g. through their participation in tender evaluation or other processes leading to the purchase of goods, services, and

works, must declare any conflicting interest which may influence or be perceived as having the potential to influence that person's ability to act impartially within the process. Any person declaring such an interest must not participate in or seek to influence any decision relating to the matter concerned.

#### 4.10 **Exercising Judgement**

4.10.1 Whilst this policy aims to reflect key principles, it cannot anticipate every individual circumstance. Where an adjustment to standard provisions is requested, the budget holder should review the situation with the staff member and, if agreed, record the decision in the relevant field within the finance system. The record must be clear, proportionate, and free from confidential or sensitive information.

### 5. **LEGISLATION AND GOOD PRACTICE**

5.1 The primary legislation impacting University purchasing includes:

- [Procurement Act 2023](#) and [The Procurement Regulations 2024](#)
- [Bribery Act 2010](#)
- [Modern Slavery Act 2015](#)
- [Equality Act 2010](#)

5.1.1 The University will comply with all statutory transparency requirements under the Procurement Act and related regulations. This includes publishing tender, award, and contract notices on the Central Digital Platform, as well as any required pipeline information for planned procurements. Where applicable, contract modifications and termination notices will also be disclosed in accordance with legal obligations.

5.1.2 Under the Modern Slavery Act, the University is committed to ensure there are no instances of modern slavery, human trafficking, forced and bonded labour, and labour rights violations in its supply chains. The University's Modern Slavery Statement is linked at the end of this policy.

#### 5.2 **Ethical obligations**

##### 5.2.1 **Gifts and hospitality offered by suppliers**

All staff involved in any way in the purchasing process must adhere to the University's rules on gifts and hospitality as set out in the University's Anti-Bribery Policy.

##### 5.2.2 **Conflicts of Interest**

Staff who are engaged in purchasing decisions through their participation in tender evaluation or other processes leading to the purchase of goods, services and works must declare any conflicting interest that may influence or be perceived as having the potential to influence that person's ability to act impartially within the process. Any person declaring such an interest must not participate in or seek to influence any decision relating to the matter concerned.

#### 5.3 **Inclusion**

##### 5.3.1 **Reasonable adjustments**

The University is committed to meeting its obligations under the Equality Act 2010. In the context of this policy, this includes making reasonable adjustments where required to support disabled staff. Adjustments may also be considered for individuals with relevant health conditions, or arising from pregnancy, maternity, or other appropriate circumstances.

### 5.3.2 Exercising Judgement

While this policy aims to reflect key principles, it cannot anticipate every individual circumstance. Where an adjustment to standard provisions is requested, the budget holder should review the situation with the staff member and, if agreed, record the decision in the relevant field within the finance system. The record must be clear, proportionate, and free from confidential or sensitive information.

### Review / Contacts / References

Policy title:	Procurement and Purchasing Policy
Date approved:	March 2026
Approving body:	Council
Last review date:	August 2024
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Related internal policies, procedures, guidance:	<a href="#">Purchasing Procedure 1 – Finding the Right Supplier</a> <a href="#">Purchasing Procedure 2 – Purchasing Cards</a> <a href="#">Purchasing Procedure 3 – Out of Pocket Expenses</a> <a href="#">Purchasing Procedure 4 – Expenditure while traveling away from main place of work</a> <a href="#">Purchasing Procedure 5 – Staff, Student and visit hospitality and incidental expenditure</a> <a href="#">Purchasing Procedure 6 – Contract Management</a> <a href="#">Purchasing procedure 7 – Guide tables to Expenditure of University Funds</a> <a href="#">Purchasing Procedure 8 – Contract Approval</a> <a href="#">The University’s Financial Regulations</a> <a href="#">The University’s Sanctions Policy</a> <a href="#">The University’s Modern Slavery Act Statement</a> <a href="#">The University’s Anti-Bribery Policy.</a> <a href="#">The University’s Supplier Code of Conduct</a> <a href="#">Ethical and Sustainable Procurement Principles Framework</a>
Division:	Finance
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