Brunel University of London

Procurement Policy

Version: 8.0

Sign Off History

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1. Introduction

1.1 Executive Summary

This Procurement Policy sets the mandatory procurement rules for Brunel University of London (BUoL). The policy applies to all persons and organisations responsible for supplier selection, contract awarding, management, and monitoring at BUoL.

1.2 Purpose and Scope

This policy ensures all procurement activities are fair, transparent, ethical, and legally compliant. It applies to:

- Purchases of goods, services, and works
- Externally funded and collaborative projects
- Compliance with Public Procurement Regulations (where applicable)
- Contract renewals, modifications, and supplier management

Failure to comply with this policy may result in disciplinary action.

1.3 Definitions

Data means any information which relates to the company, its operations or its staff or students.

Financial Regulations means the BUoL internal financial regulations.

Framework Agreement means a contract between a purchasing consortium and one or many suppliers which may be utilised by BUoL to award a procurement in a cost effective and risk averse manner.

Goods and Services means products or services provided by an individual or company. Includes maintenance work, soft and hard facilities management, does not include construction or demolition services.

Procurement means the acquisition of Goods, Services or Works in return for payment.

Public Contracts Regulations means the Public Contracts Regulations 2015 (as amended). These regulations set out the legal requirements which must be adhered to by public bodies when applicable.

Purchasing Consortium is a membership organisation responsible for delivering Framework Agreements. Examples are Crown Commercial Services and the London Universities Purchasing Consortium. These organisations are collectively known as Consortia.

Single Tender Action means, where very specific situations apply, the process which may be followed to award a contract without following the usual competitive process.

Thresholds mean the monetary values associated with the requirement at which a specific procurement process applies.

Works means construction or demolition services including electrical wiring, insulation work, plumbing and gas, heating and ventilation, building completion (plastering, flooring, joinery, wall coverings, internal or external painting and glazing). Includes major renovation projects, does not include routine maintenance or decoration (soft and hard facilities management).

2. Operating Model

2.1. Responsibility and Application of the Policy

- **Associate Director of Procurement** is accountable for procurement policy compliance and strategic direction.
- **Procurement Department** manages procurement strategy, supplier relationships, and category-based procurement.
- **Budget Holders & Officers** ensure policy adherence, approve expenditures, and monitor supplier performance.
- **Contract Managers** manage contractual obligations and supplier performance.

2.2. The Procurement Department

The Procurement Department applies a Category Management approach for managing all spend and leads on procurement activity over £50,000 excluding VAT.

The Procurement Department aims to aggregate spend and contract for goods and/or services over multiple years to ensure BUoL can derivate maximum value and economies of scale from the procurement. The contract term will be determined by the Procurement Department in conjunction with the relevant College/Directorate.

The purpose of the Procurement Department is to ensure that the required goods, services and works arrive at the right place, time, quality and cost in order to support the delivery of the University's key organisational objectives and in making commercially sound decisions incorporating:

- Value for Money
- Whole Life Costing
- Sustainability/Social Value Considerations
- Compliance with the latest Government Procurement Regulations (where applicable)
- Compliance with the latest GDPR Regulations

2.3. Category Management

Category Management is a strategic approach which organises Procurement resources to focus on specific areas of spend.

The Category Managers focus their time and conduct in depth market analysis to fully leverage their procurement decisions on behalf of the University. They act as commercial lead and provide expert knowledge and advice and deliver all procurement with an aggregated value over £50,000 (exc VAT).

The major spend categories are:

Major Spend Categories
Soft Facilities Management
Construction & Hard Facilities Management
Information, Communications & Technology
Professional Services
STEM, Teaching/Research Projects

2.4. Procurement Operations

Procurement Operations supports the procure to pay (P2P) activity for BUoL, advising on all aspects of the procurement cycle and the use of the ERP System for raising requisitioning all the way through goods receipting.

Procurement Operations is responsible for the management of the University's Purchasing Card (PCard) Programme.

Procurement Operations will carry out due diligence checks on all new suppliers, before they are approved. These checks will be completed and recorded by the Procurement Operations team and include:

- Financial data on the supplier,
- Financial strength (a Credit Safe report will be generated, any Supplier scoring lower than 30 will be rejected),
- Insurances,
- Conflict of interest declaration, and
- References (if required).

Important - The Procurement Department doesn't allow retrospective set-up of Suppliers. Retrospective setup meaning the Supplier has already committed to provide work/services to the University at the point of request. This is to allow the Procurement Department to advise at the point of the set-up request whether a preferred Supplier should be used instead. All retrospective Supplier set-ups will be recorded for audit purposes. Non-compliance with this process may lead to the Procurement Operations team to reject the retrospective set-up request.

Procurement Operations requires requesters to attach the relevant supporting information (*please refer to section 3.12*) to their Supplier set-up and/or STA as the spend committed to on these forms will be monitored. This is to ensure that:

- The spend thresholds are being adhered to for audit purposes; and
- If overspend occurs, explore the needs for any tender to be run and contracts to be put in place.

2.5. Brunel eSourcing

Brunel eSourcing is the University's Procurement Portal which encompasses spend analysis, strategic sourcing, evaluation and contract management in an integrated portal.

2.6. Lead Officers

Lead Officers at BUoL are persons responsible for or involved in the procurement of Goods, Services and Works below £50,000 (exc VAT). Lead Officers:

- must adhere to this policy,
- are required to ensure they are able to demonstrate they are achieving value for money through the process undertaken,
- must ensure that the highest levels of ethical standards and behaviour are maintained at every stage of the procurement process.

The Procurement Department has published guidance for procuring Goods, Services and Works below £50,000 (exc VAT) and will continue raising awareness through the organisation of yearly Roadshows.

If Lead Officers are unsure of best practice, guidance is to be sought from the Procurement Department by emailing procurement@brunel.ac.uk.

All procurement processes must follow the below steps as a minimum:

- Be aware of existing contractual obligations
- Understand and clearly specify in writing the requirement and the impact of the procurement on the University department/s
- Follow the correct procurement process in accordance with the thresholds table
- Formally contract with the supplier in writing – simple or complex
- Raise a purchase order (this may be our contract for smaller requirements)
- Receive goods/services
- Receive and check invoices
- Pay the supplier on time
- Contract manage the agreement (for all contracts longer than one year)

It is not acceptable to raise a purchase order after goods or services have been received or only in response to an invoice.

Payments to suppliers will be made in arrears, and to 30-day payment terms. Any exceptions should be discussed with the Associate Director of Procurement.

2.7 Purchasing in CHIME

The majority of purchasing within the University is done using our ERP system CHIME. Whilst the University operates a No PO No Pay policy, there are Purchasing Cards and One-Off Payment routes that can be explored as a method for purchasing in exceptional circumstances.

A Purchase Requisition only transfers into a confirmed Purchase Order once it has been through the appropriate approval workflow. The information that is contained in the requisition will appear on the purchase order that is sent out to the supplier. The information is also then displayed in CHIME via different reporting output.

A user of the Requisition Standard screen is expected to have completed the following Procurement Training sessions:

- Manage Suppliers
- Requisition and Purchase Order Overview training session
- Receipting in CHIME

When completing a requisition, the user is required to use due diligence when adding additional texts and descriptions that may lead to the identification of anything or anyone that is deemed to be protected via the data protection principles, for example not using individual names or other identifying information, such as a role. Always consider the principle of data minimisation, only collect what you need to process a PO and ensure that you use reference numbers/codes provided by suppliers.

When using the CHIME reports, designed to show a user their own purchase orders, to manage the receipting of goods and/or services and the subsequent payment of invoices, no information should be shared with others who do not need to know.

If anyone obtains information from purchase orders in CHIME that is deemed to be a breach of data protection, it will be reported to the Privacy Team without delay. Breaches can occur in the following ways:

a) Misdirected emails or documents
b) Inadequate disposal of information
c) Physical information lost or left unprotected (such as bank cards, passports, confidential correspondence)
d) Leaving IT equipment unattended when logged-in to a user account without locking the screen to prevent others accessing information
e) Loss or theft of laptop, mobile device or USB
f) Physical security e.g. forcing of doors or windows into a secure area or restricted information left unsecured in an accessible area g. Unauthorised use of a BUoL systems and information i.e. hacking
g) Virus or other malicious (suspected or actual) security attach on IT equipment systems or networks
h) Disruption to, failure of loss of access to information or services due to fire, flood, power outage, cyber-attack, theft or any other disruptive action that prevents access to Personal Data.

More information can be found on the Data Protection & Information Access Policy.

2.7. Conflict of Interest and Ethical Conduct

- Staff must declare conflicts of interest before engaging in procurement activities.
- All Officers involved in procuring goods/services/works must behave with the highest levels of integrity in accordance with the Bribery Act 2010 and BUoL Anti-Bribery Policy.
- Receipt of gifts or hospitality must comply with BUoL Financial Regulations.

Failure to adhere to these conditions may result in disciplinary action.

3. Procurement Planning and Thresholds

3.1. Corporate Contracts

The Procurement Department has awarded a range of Corporate Contracts for goods, services and works that are commonly required (i.e. Stationery, PPE Equipment). Using these Corporate Contracts is mandatory, and compliance will be monitored/reported upon.

Corporate Contracts may be accessible through various P2P routes: Punchout Catalogues set-up on ERP system, Purchasing Orders or directly through Supplier Portals. Officers must seek advice from the Procurement Department if unsure which P2P route is to be followed.

3.2. Estimating the Total Contract Value

Lead Officers should calculate a genuine pre-estimate of the total contract value excluding VAT. This should be for the whole life of the contract period and must include any provisions for extensions. If the terms of a contract are yet to be established or uncertain, then a 4-year contract should be assumed for the purposes of estimating the contract value.

Lead Officers must not deliberately sub-divide or disaggregate procurement for the purpose of avoiding procurement thresholds.

3.3. Spend Definitions

- ***Works*** are defined as the construction, demolition, transformation or repair of a building or location.
- ***Goods and Services*** are defined as the provision of tangible items (goods) or intangible routine actions (services) that are required to fulfil a need.
- ***Consultancy Services*** are defined as the provision of objective advice relating to strategy, structure, management or operations of an organisation.

3.4. Standard Procurement Documents

The Procurement Department is responsible for developing and maintaining standard procurement documents to be used when conducting tender or requests for quotations. These shall be used for all procurements above £50,000 (exc VAT).

3.5. Terms & Conditions of Contract

The University will only use and accept its own standard Terms and Conditions. The standard terms and conditions are located on the Intranet. Any variation to the standard Terms and Conditions will require express authorisation and advice from the Associate Director of Procurement, who will seek advice on alternative clauses from Legal Services as appropriate.

3.6. Tender Evaluation Criteria

The standard evaluation criteria for any procurement is weighted 60:40 to Cost:Quality. Any deviation from this ratio requires the Associate Director of Procurement's approval. This rule to obtain approval will not apply to procurement where the total contract value is below £100,000 and the price criterion is increased.

3.7. Responsible Procurement

For all contracts with a total contract value of £50,000 or above, the University requires a minimum of 5% of the total weighting of the tender evaluation score to be allocated for Responsible Procurement. This will be derived from the Quality section of the evaluation and will include social, economic and environmental characteristics (example: Quality has 40% overall weighting Social Value will be 5% of that weighting allowing 35% for other quality evaluation criteria). This is aligned with the University's Responsible Procurement Policy.

Contracts exceeding £50,000 exc VAT require suppliers to sign the BUoL Supply Chain Code of Conduct available on the Intranet.

3.8. Procurement Thresholds and Approval

The Thresholds below detail the procurement procedure which should be followed. There may be exceptions however these must be discussed with the Associate Director of Procurement.

Values should be considered exclusive of VAT over a 4-year period. If more than one contract is to be let to the same supplier, the cumulative value of the requirement must be considered.

Framework Agreements should be considered for all procurement requirements below £50,000 for Goods and Services, or below £100,000 for Works.

Please refer to the definitions of Goods, Services and Works to ensure you use the correct thresholds table below.

Goods, Services and Works Procurement

Estimated value of requirement excluding VAT over a 4-year period	Procedure	Detail	Procurement involvement
<£15,000	1 Formal quote	See guidance. Ask supplier to send information, no BUoL templates required. Use the University's Standard Terms and Conditions. Consider Framework Agreements.	No
£15,000 to £50,000	3 Formal quotes	Use BUoL appropriate terms and conditions (relevant to the requirement) available on the Intranet. Consider Framework Agreements.	Seek advice if required.
£50,000 +*	Formal Tender with Central Procurement Team support	Consult Procurement for appropriate. Use Brunel ESourcing to run the procurement process (Mandatory) Consider Framework Agreements.	Yes Mandatory

**In accordance with UK Research & Innovation T&C's: for the purchase of equipment over £25,000 (ex.VAT), procurement team must be consulted before the Procurement process begins.*

3.9 Subcontracting threshold and direct procurement considerations

Where subcontracting to a single Supplier is anticipated to exceed 30% of the total contract value, or £15,000 ex VAT (whichever is greater), the University will assess the feasibility of separating this element into a distinct, directly managed contract. This approach aims to ensure transparency, value for money and effective oversight of significant subcontracted activities. The Procurement Department should be consulted at the earliest opportunity to advise on the most appropriate approach.

3.10. Single Tender Action (STA)

A Single Tender Action may be used only on occasions where the University is required to award a contract to a specific supplier and a competitive process is genuinely not possible. There are a small number of circumstances where a Single Tender Action may be necessary.

A) A genuine emergency, when immediate action is necessary to:

- Prevent significant loss to the University
- Prevent danger, injury or hardship
- Comply with legislation

Failure to consider planning for procurement far enough in advance does not qualify as an emergency.

B) Only one supplier is able to provide the requirement and no satisfactory alternative is available because of:

- Technical or artistic exclusive rights reasons
- The requirement is for branded items which are sold at a single fixed price

C) Addition or extension to an existing or previous contract where it would be inappropriate to offer the additional work to a competitor due to technical or copyright reasons.

D) When “spot-purchase” demonstrably provides better value for money than longer term contract arrangements (i.e. Auction).

STA’s cannot be requested retrospectively. Requests for retrospective waivers, where a commitment has been made to a provider of works/goods/services without appropriate approval, will be reported to the Audit Committee as non-compliant and will also be reported to the Executive Board as part of the quarterly contract review and to the Audit Committee as part of the Annual Contract Review.

3.11. The Public Contracts Regulations

The University is not legally required to comply with the Public Contracts Regulations 2015 however, there are a small number of occasions where funding bodies, especially Grant providers, will request that they are followed. Where a procurement is linked to a Grant, persons must ensure they check the terms and conditions for the appropriate process required and seek support from the Head of Procurement to ensure the regulations are adhered to compliantly.

3.12. Documentation and Specification

The use of the relevant BUoL quote and tender documentation is mandatory.
Where low value and low risk purchases are made (under £50,000 exc VAT) supplier Terms & Conditions may be used (if checked and appropriate) as an alternative to the University's Terms and Conditions. For requirements above £50,000, BUoL standard Terms and Conditions must be used unless the requirement is of a unique or specialist nature, on these occasions, the Associate Director of Procurement must be consulted. When specifying requirements, these must be clear and accurate with appropriate quantities and quality references. Brand names should be avoided to ensure competition is maximised.

3.13. Health and Safety Requirements

Procurement activities within the University should take appropriate account of health and safety considerations. Suppliers, contractors and procured goods/services should comply with all relevant UK Health and Safety legislation, sector-specific standards and University policies. As part of the procurement and contract management process, appropriate due diligence should be carried out to assess Suppliers' health and safety practices, including their risk management procedures, competency and relevant accr editations, as appropriate. This approach supports the University's commitment to maintaining a safe and healthy environment for staff, students, visitors, and the wider community.

3.14. Digital & Data Assurance

Contracts involving data processing must comply with GDPR and undergo IS security review.
Cybersecurity risks must be assessed before contract approval.

3.15. Procurement Exemptions

In limited instances it is not necessary to seek a competitive tender, quotations or an STA; the list of approved exemptions to procurement is included in Appendix 1.

4. Contract Award and Signature

The contract thresholds set out the level of approval required prior to proceeding with the **award of a contract**. When seeking approval, lead officers must clearly state the contract term (which must include any provisions to extend).

Total Contract Value (exc VAT)	Contract Award Approval
Less than £50,000	Appropriate member of BUoL Leadership Team*, Procurement Category Manager.

Strategic £50,000 +	Appropriate member of BUoL Leadership Team*, Procurement Category Manager and Associate Director of Procurement.
Strategic £150,000 +	Appropriate member of BUoL Leadership Team*, Procurement Category Manager and Associate Director of Procurement.
Strategic £1 million +	Chief Finance Officers or Chief Operating Officers, Procurement Category Manager and Associate Director of Procurement.
Strategic £3 million +	Vice Chancellor, Chief Finance Officers or Chief Operating Officers, Procurement Category Manager and Associate Director of Procurement.

**Deputy Vice Chancellor, Deans of College, Directors of Institutes, Directors of College Operations and Directorate Heads*

Following on the contract award approval, once the Contract is ready for signature, the below scheme of financial delegation is applicable (as per Scheme of Financial Delegation Authority Document):

Total Contract Value (exc VAT)	Contract Signature
Up to £15,000	Head of Department / Institute (system approver Finance Administrators) and Procurement Category Manager.
£15,001 to £50,000	Heads of Department (Academic), Directors of Institutes, College Managers and Procurement Category Manager.
£50,001 to £100,000	Pro-Vice Chancellors and Executive Deans of College, Directors of College Operations, Directorate Heads and the Associate Director of Procurement.
£100,001 to £1,000,000	Vice-Chancellor and President, Deputy Vice-Chancellor, or Chief Operating Officer and the Associate Director of Procurement.
Exceeds £1,000,000	Requires additional approval from either – Vice-Chancellor and President, Deputy Vice-Chancellor, or Chief Operating Officer and the Associate Director of Procurement.

In the event of an approver being absent, the substitute for the period of absence would ordinarily escalate to the approver with a higher approval authority within the chain of escalation or to a peer. In the event of the absence of the Head of Department a nominated alternate from within the department is permitted, provided that this individual ordinarily assumes responsibility for the university during the Head of Department's absence. The Head of Department should confirm this nominee.

Information relating to Contracts may be commercially sensitive and officers must not communicate it directly or indirectly to other external suppliers.

BUoL does not enter into Memorandums of Understanding or issue Letters of Intent for procurement exercises.

BUoL will only issue or operate under Voluntary Ex-Ante Transparency (VEAT) notices in exceptional circumstances. Any VEAT must be approved by the Associate Director of Procurement and Chief Finance Officer prior to notice being completed. A standstill period of 10 days must also be observed.

No goods will be delivered, works or services commence without a proper contractual commitment in place.

All contracts shall have a defined duration and provision(s) for extensions and termination.

Contracts shall not have provision for automatic roll over or be allowed to exist in perpetuity.

4.1. Contract Extensions and Variations

Lead Officers must consult the Procurement Department, on all contract extensions or variations to ensure compliance with this Policy. It should be noted that the extent of permitted variations is limited by law and require specific conditions to be fulfilled.

Extending or varying the terms of a contract may require the same approvals as the contract award. This is appropriate to the total contract value and will depend on the specific factors and assessment of any potential risks concerning the proposed extension or variation.

4.2. Contract Management

Contract Management is the responsibility of the College/Directorate. This includes ensuring a Contract Manager is identified during any tendering process.

Periodic reviews of our strategic suppliers will be undertaken quarterly. The Contract Manager and Procurement Category Manager will be present and review supplier performance during the contract period. Ideally suppliers will be monitored against a set of Key Performance Indicators (KPIs), Service Level Agreements (SLAs) agreed before contract commencement date.

Any operational discussions or meetings with our strategic suppliers will be led by the Contract Manager or designated person from the business area, responsible for operational issues. Any commercial discussions or meetings with our strategic suppliers must be led by Procurement.

4.3. Changes of Suppliers Details

The Procurement Department must be consulted on any requests for the assignment or novation of contracts to ensure compliance with the Public Procurement Regulations.

Copies of all documentation such as a Deed of Novation or Parent Company Guarantee must be supplied to the Procurement Department for contracts valued at £50,000 exc VAT or more.

The supplier shall cover all costs arising from assignment/novation where this has been at the request of the supplier.

Where it is established that no assignment or novation has taken place, but only a rebranding exercise following a company merger or acquisition, then a copy of the Change of Name Certificate must be provided to the Procurement Department.

4.4. Record Keeping and Audit Requirements

All procurement records must be retained for six years.

Contracts awarded under seal must be stored for 12 years.

The University enforces a No PO, No Pay policy. As such, a valid PO must be raised on the ERP system and appropriately receipted.

4.5. Purchasing Cards (PCards)

Where appropriate, the Chief Finance Officer may approve the issuing of procurement cards. The Associate Director of Procurement is responsible for setting in place a system to monitor the use of all cards and to ensure that all expenses charged through them are properly accounted for.

Holders of PCards must use them in accordance with the University Procurement PCARD Policy available on the Intranet.

5. Further Information & Contact

For procurement guidance, visit the Procurement pages on the Intranet or contact the Procurement Department at procurement@brunel.ac.uk.

APPENDIX 1

University Procurement Exemptions

There are instances where conducting a procurement under the Procurement Policy would not represent Best Value, these circumstances are set out in the table below and may be exempt from the full application of the requirements of the Procurement Policy. ***Please note that if there is an identified exemption, you do not need to seek a waiver (STA) of the Procurement Policy***.

A Category Manager shall still be engaged for expenditure - £50,000 exc. VAT and above.

Note that the examples listed below are not necessarily exhaustive. Any use of these exemptions must be pre-approved by the Procurement Department and lead officers must seek the advice of a Category Manager to ensure that the correct process is followed.

Exemption Number	Circumstance	Example
E1	BUoL has no influence over the supplier selection	The procurement activity is grant funded (or BUoL is match funding) and the supplier is named as a condition of that funding.
		Where it can be robustly demonstrated that there is only one supplier capable of providing the requirements of BUoL (e.g. Where software is being procured which must be compatible with an existing IS system thereby limiting the potential providers to the current software provider ONLY).
		A subscription is to be paid for a particular service (e.g. annual subscription to London Universities).
E2	BUOL are buying goods on behalf of another organisation and those goods will remain on their asset register.	e.g Where purchases are made on behalf of the NHS.
E3	Where services need to be procured as a matter of extreme urgency, timescales do not allow for the prescribed procurement route set out in the	Where an incident occurs, which has brought about the events that could not be unforeseen circumstances by BUoL.

	Procurement Policy to be fully followed. This would normally be within 7 day of the incident occurring.	
E4	The acquisition, disposal, or rental of land, existing buildings or other immovable property.	Sale of University land to public or private organisation.
E5	Loans	Secured lending to fund the development of a new building.
E6	Banking Services	Banking services including the provision of current and deposit accounts and related financial services.
E7	Payment Card Services	Including but not exclusively PCards and Lodge Cards.
E8	International Recruitment	Overseas (non-EU) providers of international recruitment who are paid based on number of students accessing BUoL graduate/post graduate courses.
E9	Library Services	Specific suppliers where they have exclusive books/journals that can only be procured from them direct.
E10	Collaboration Agreement	Specific Institutions have entered into a collaboration agreement and therefore this partner Institution is the only one that can be used.
E11	Direct Award with procurement involvement	A direct award to a single supplier may be approved where the Procurement Category Team has been actively involved in the process, endorsed the justification for the direct award and has helped secure measurable financial and/or non-financial benefits for the University.