SUSTAINABLE PROCUREMENT POLICY 2026/2027

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Approved by:	Corporation Board
Policy Lead:	Deputy Chief Executive Officer (DCEO)

Waltham Forest College

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1. Policy Statement

It is the policy of Waltham Forest College, herein after referred to as “the College”, to ensure that any spend of public money regardless of value is carried out in a transparent and non-discriminatory way and in compliance with the College’s Financial Regulations, the relevant Public Contracts Regulations and Bribery Act as updated from time to time.

The College Procurement Policy is applicable to all purchasing activity regardless of value and should be followed by all staff involved in purchasing whether centrally or department based.

As a publicly funded organisation, the College, in accordance with procurement legislation is a ‘Contracting Authority’. Subsequently any procurement activity is regulated by the UK Public Contracts Regulations/The Public Regulations as updated from time to time. Any procurement activity has to be carried out in a transparent and non-discriminatory manner.

This policy sets out how the College will manage its procurement to ensure compliance with relevant legislation. Failure to comply with this policy and/or follow the procurement procedures set out in this document and in the Financial Regulations could result in a breach of legislation, fines and litigation, claims for damages and loss of reputation.

2. Purpose of the Procurement Policy

- The purpose of this document is to clearly set out Waltham Forest College’s Procurement Policy and to guide staff in adhering to appropriate procedures when undertaking procurement activities. This policy must be read in conjunction with the College’s Financial Regulations.
- The Procurement Policy applies to all purchasing activity, irrespective of value, and is mandatory for all staff involved in procurement, whether operating centrally or within individual departments.
- Following the implementation of the Public Procurement Regulations 2024 (PPR2024)—which consolidate and replace the Public Contracts Regulations 2015, Utilities Contracts Regulations 2016, Concession Contracts Regulations 2016, and aspects of the Defence and Security Contracts Regulations 2011—this policy ensures full compliance with the updated legal framework. It also incorporates relevant requirements from the Department for Education (DfE) and other applicable regulatory bodies.
- The policy reflects and supports the College’s commitment to achieving best value in the procurement of works, goods, and services, by promoting ethical, transparent, and sustainable practices. It seeks to strike a balance between efficiency and risk, while ensuring robust governance and operational integrity.
- This Procurement Policy will be reviewed annually, or more frequently in response to changes in legislation or regulatory requirements.
- All staff involved in procurement are expected to uphold the core principles of best practice: transparency, fairness, value for money, and the delivery of high-quality goods and services that support the College’s strategic and operational objectives.

3. General Principles

When purchasing and contracting for goods and services, the College must demonstrate compliance with procurement legislation and the proper and effective use of public funds at all times. Purchasing procedures should ensure that goods, services, and works are procured in the correct quantity and quality, are delivered on time, and represent best value. In addition to these requirements, the College recognises its responsibility to support sustainability and carbon reduction objectives as part of the procurement process.

The following general principles must therefore be adhered to:

Transparency and Non-Discrimination: The College must ensure that all contractors, suppliers, and service providers are treated equally and without discrimination and must act in a transparent and proportionate manner in all purchasing activity.

Open and Fair Competition: Procurement procedures must not be undertaken in a manner that artificially narrows competition or favours or disadvantages any contractor, supplier, or service provider. All procurement activities must comply with the advertising and budgetary approval thresholds set out in the Financial Regulations.

Probity: All parties must be dealt with on a fair and equitable basis, and there must be no private gain, favouritism, or corruption in any dealings of the College.

Accountability: the College is publicly accountable for its expenditure and for the conduct of its affairs;

Value for Money: Achieving value for money is fundamental to the proper use of public funds. While striving to secure the most competitive price, the College must also consider factors such as quality, suitability, availability, supplier reliability, and contractual terms.

Sustainability and Carbon Management: Procurement decisions must consider environmental sustainability and carbon reduction objectives. The College should, where practicable:

> Source goods and services that are environmentally responsible or certified (e.g., energy efficient, sustainably sourced, or low-emission products).Favour suppliers who demonstrate a commitment to reducing carbon emissions and operating sustainable practices.
>
> Reduce waste and consider the lifecycle environmental impact of products and services.
>
> Encourage innovation and the use of sustainable technologies in procurement specifications.

These principles ensure that procurement contributes not only to financial and legal compliance, but also to the College's wider commitment to environmental responsibility and achieving Net Zero targets.

4. What is Procurement?

Procurement is the process whereby goods, services and works are acquired. The procurement process spans a life cycle from identification of need and resources, through selection of suppliers, purchasing, contract management and disposal.

Purchasing is the transactional process of buying the goods/services and is just one part of procurement.

5. The UK Public Procurement Regulations 2024 (PPR2024)

The College is subject to the UK Public Procurement Regulations 2024 (PPR2024. The purpose of PPR2024, covering supplies, works and services, is to encourage and stimulate an open marketplace for public procurement throughout the UK. It is understood that legislation may change from time to time, as a result of government changes or implications such as Brexit and therefore the most up to date guidelines must be followed.

The PPR2024 Regulations set out the legal framework for public procurement. They apply when public authorities and utilities seek to acquire supplies, services or works. They set out procedures which must be followed before awarding a contract when its value exceeds set thresholds.

All UK contracting authorities, irrespective of the source of funding for a particular purchase, must comply with the PPR2024 Regulation and any other Directives. Because of the importance of getting a good quality specification it is essential to plan early as PPR2024 procedures are lengthy and employees with an order or contract expenditure with lifecycle costs approaching the PPR2024 tender threshold which is currently £207,720 for goods and services and £5,193,000 for works (These values are inclusive of VAT) must allow sufficient time for compliant procurement procedures to be conducted. In special circumstances, the Light Touch regime may be used which have different values to work to.

UK authorities are becoming increasingly concerned at breaches of the Regulations and Directives by contracting authorities including Colleges. Breaches of UK PPR2024 may incur penalties from HM Treasury or the DFE. Employees should therefore notify the DCEO of anticipated high value expenditure at their earliest opportunity.

Even when a tender process is not subject to the UK PPR2024 Regulations (for example because the estimated value of a contract falls below the relevant threshold), UK based principles of non-discrimination, equal treatment transparency, mutual recognition and proportionality apply. Some degree of advertising, which is appropriate to the scale of the contract, is necessary to demonstrate transparency. This is in line with the UK objective of achieving value for money in all public procurement.

6. Value for Money/Aggregation

Value for money is the optimum combination of whole life cost and quality (or fitness for purpose) to meet the user's requirement. This is rarely possible with the lowest price alone. To ensure that all purchases obtain optimum value for money, the College is committed to obtaining works, goods and/or services which are best suited to any application in a manner which is compliant with current legislation, PPR2024 and best practice.

All procurements shall satisfy the following 3 criteria to ensure optimal use of resources to achieve the intended outcomes:

- Economy: minimising requirements and cost. spending less;
- Efficiency: the relationship between the output from goods or services and the resources to produce them – spending well;

- Effectiveness: the relationship between the intended and actual results of public spending (outcomes) – spending wisely.

7. Authorisation Thresholds and processes

The College operates a structured system of financial authorisation for all procurement activity. The authorisation thresholds applicable to non-capital purchases, capital purchases, and multi-year contracts are set out in the College's Financial Regulations.

The current authorisation thresholds and the designated approval authorities for each band — including both standard College authorisation arrangements and alternative authorisation arrangements — are set out in the Financial Regulations, as approved by the Board and updated from time to time. Staff must refer to the current Financial Regulations for the operative figures before committing the College to any expenditure.

The principles governing the authorisation process are as follows:

- Any member of staff placing a purchase order must be satisfied that they hold the correct level of financial authority in accordance with the Financial Regulations, and must obtain approval from a more senior member of staff with a higher approval limit where required.
- The College operates a system of devolved financial authority under which the DCEO is responsible for decision-making process and planning of purchasing decisions.
- The budget holder or requisitioner is responsible for specifying requirements, evaluation criteria, and committing funding.
- No member of staff may approve purchases unless they have been given authority within the Financial Regulations to do so.
- No employee is authorised to commit the College to expenditure without first ensuring that adequate budget provision exists.
- Schemes of work should not be artificially broken down into smaller orders to phase the issue of purchase orders and thereby circumvent either authorisation levels or the requirement to obtain further quotes or tenders.

Unless below the threshold for obtaining multiple quotations or tenders, all procurement of goods, works, services or consultancy should be sourced by effective competition, including adequate publication of the contract opportunity, unless there are convincing and justifiable reasons to the contrary. Competition promotes efficiency and effectiveness in expenditure. Awarding contracts on the basis of value for money following competition contributes to the competitiveness of supplies.

8. Technical

The minimum procurement requirements applicable to orders for goods and services depend on the value of the order. The specific monetary thresholds triggering each level of procurement activity (single verbal quote, written quotes, Contracts Finder advertising, and Formal Tender) are set out in the College's Financial Regulations.

> *Staff must refer to the current Financial Regulations for the operative threshold values before determining the appropriate procurement route for any order.*

Regardless of value, all procurement activity must comply with the general principles set out in this Policy, including transparency, value for money, and non-discrimination.

9. Technical Authorisation and Approval

All technical Procurements must be authorised by the relevant technical department to ensure aggregation and compliance are achieved.

- IT procurements must be authorised by the Assistant Director of IT
- Estates related procurements must be authorised by the Director of Estates

10. Financial Authority to Commit Expenditure

- Any member of staff placing a purchase order must be sure that they have the correct level of authority to do so in accordance with the Financial Regulations and where required must obtain approval from a more senior member of staff with a higher approval limit if necessary.
- The College operates a system of devolved financial authority under which the DCEO is responsible for the decision-making process and planning of purchasing decisions.
- The budget holder or requisitioner is responsible for specifying requirements, evaluation criteria and committing funding.
- No member of staff may approve purchases unless they have been given authority within the Financial Regulations to do so.
- No employee is authorised to commit the College to expenditure without first ensuring that there is adequate budget provision.
- Schemes of work should not be artificially broken down into smaller orders to phase the issue of purchase orders and thereby circumvent either authorisation levels or the requirement to obtain further quotes/tenders.

11. Purchasing Thresholds

There are two types of threshold governing the procurement for the College. Firstly, authority to commit expenditure, which is covered in the Financial Regulations and secondly the procurement process which is governed by the anticipated lifecycle cost of the procurement.

The transactional thresholds and procurement processes required are set out in the Financial Regulations and must be read in conjunction with the requirements of the UK Public Procurement Regulations 2024 (PPR2024). Staff must refer to the current Financial Regulations for the operative figures.

In accordance with UK PPR2024 Regulations, the use of a direct-award through a government-approved procurement framework is permitted where the framework allows.

12. Use of Procurement consultants and CPC

The College may, from time to time, engage procurement consultants to support its procurement activities. This may be necessary in the case of high-value contracts, tenders, or where specialist procurement expertise is required.

The College procurement activities are overseen through an outsourced service provided by the Crescent Purchasing Consortium (CPC).

13. Dispensations by a waiver to obtain alternative quotes

In exceptional circumstances, a dispensation from the requirement to obtain alternative quotes may be granted. To request this, the budget holder must complete a waiver form. The waiver may permit actions such as soliciting a single quotation, awarding a contract, or placing an order without the required number of tenders or quotations. It may also allow for the direct award of a contract.

All waivers require prior approval from the Budget Holder and the DCEO or designate.

Waivers must not result in a breach of procurement legislation or be contrary to the College Financial Regulations

All waiver requests, whether approved or rejected will be reported to the DCEO. Staff should be called upon to explain the reasons for requesting a dispensation.

Waivers from the requirement for competitive quotations / tenders must not be used to avoid competition, or for administrative convenience, or to award fresh / further work to a supplier originally appointed through a competitive procedure.

A waiver form will not be required in circumstances where sole-suppliers exist due to local monopoly situation.

All waivers will be subject to obtaining and documenting appropriate evidence for single quotation / tender action, obtaining authorisation for such action in accordance with the Financial Regulations and never breaching current UK Public Contract Regulations.

Subject to approval as outlined in the College Financial Regulations, dispensations may be granted for the following reasons:

- Unforeseen emergency requirements
- The goods or services are only available from one source and there is no possibility of the College's requirements being met in any other way
- An extension is required to a current contract in order to allow sufficient time to complete a competitive tendering exercise (but failure to have planned the re-procurement would not be justification for a single tender)
- Where the seeking of tenders and subsequent contract award could cause significant operational difficulties and where any potential savings would be outweighed by those operational issues (which along with a VFM analysis must be documented) and only for use in circumstances to be approved in accordance with the Financial Regulations, under the specific advice of the Principal and DCEO.

A record of the reason(s) for the seeking and granting/declining of dispensations will be kept in accordance to the College retention policy.

14. Raising Orders

Following the raising of a requisition which must be approved in accordance with the Financial Regulations, official purchase orders must be raised for all goods, works, services and/or consultancy required by the College using the computerised Finance system in use at the time, unless specifically exempted.

The Financial Regulations document the purchasing process and must contain adequate controls to ensure that:

- Official orders are raised in respect of all goods, services and works required by the College, except for those specifically exempted. The college adopts a No PO No pay policy.
- Only goods, services and works required by the College are actually ordered.
- Competitive quotations or tenders are obtained for all orders where the value of goods, services or works, individually or for a series of contracts, would exceed the relevant financial thresholds.
- Orders for goods, services and works are placed with the most appropriate suppliers in terms of cost, quality and delivery.
- Goods, services and works received are in accordance with those ordered.
- Payments are made only in respect of invoices authorised in accordance with the Financial Regulations and the College's funds are adequately safeguarded.
- All payments are accounted for properly, promptly and in full.
- Relevant, timely and accurate management information on non-pay expenditure is produced and utilised.
- Adequate physical and logical security is in place.
- All technical Procurements must be authorised by the concerned technical department e.g. All IT related requirements must be pre-approved by IT, Estates related requirements must be pre-approved by the Director of Estates etc.

Specific exemptions to the requirement to raise an official purchase order are limited to:

- Rent or business rates

Utility costs

- Works and services executed under a contract
- Purchasing card transactions, where prior authorisation has been granted by the budget holder, technical approver where pertinent and the DCEO or designate.
- Exams expenditure
- Subscriptions and Software Licences

In accordance with the College's Financial Regulations, before raising any order, checks must be carried out to ensure that no one who has declared a conflict of interest in relation to the purchase or the supplier/service provider has been involved in the selection process.

No orders shall be placed, or contracts altered or extended, with the intention of avoiding the relevant thresholds applicable within the Financial Regulations.

15. Supplier Management

- Purchase orders, contracts and payments should only be raised/made to suppliers which have passed College vetting procedures and have been added to the Finance system.
- New suppliers may only be added to the Finance system following completion of a new supplier form and the requisite vetting procedures.
- All staff who raise purchase orders for work should satisfy themselves that where required, contractors comply with the College's safeguarding expectations before working. The College has issued guidance for the safeguarding of learners whilst contractors are on site which must be followed.

16. Competition

Subject to the thresholds in the Financial Regulations and section 7, competition should be proportionate to the level of expenditure, complexity and risk.

Care should be taken to specify accurately the goods/services required in a way which is unambiguous, offers equality, removes barriers to participation by SMEs, and self- employed people without discriminating against others.

Any minimum standards should be proportionate to the contract and not discriminatory other than where legally required.

When estimating the value of a contract, unless it is a one-off cost, the actual cost of the works, goods or services must be for the whole life costs and include any ongoing costs. If the whole life period is unknown, then three years should be the baseline for costing. Once the whole life cost has been estimated the appropriate procurement procedure should be followed.

Social Value

In accordance with the UK PPR2024 Regulations, social value should be explicitly evaluated in all procurements, where the requirements are related and proportionate to the subject-matter of the contract.

It is a requirement that the College must ensure that social value is considered and where appropriate incorporated into the tendering procedures within the quality element of the evaluation process and take the opportunity at the point of negotiation to increase the social value of each contract.

Financial Standing of Suppliers

For all procurement processes above 'tender' threshold, the College must assess the financial standing of suppliers to ensure that they are suitable for Waltham Forest College.

The financial assessment will be carried out by the designated college finance staff or procurement consultants and signed off by the DCEO.

17. Contract Agreement/Terms and Conditions

All procurement should be carried out using the College's standard terms and conditions. There may be certain exceptions to this where the use of an established framework or access to specific software requires it. In any case any departure from College terms and conditions must be approved by the DCEO before agreement is made.

Any agreement, contract or lease with a supplier which requires a signature by a member of the College (not including general orders for goods and services) should be forwarded to the DCEO for review prior to signature in line with the College Scheme of Delegation.

Following the identification of the most favourable offer for the College, whether by best value, quotation or tender, consistent with the thresholds identified above, contracts may only be awarded by those officers to whom the Senior Leadership Team/College Board has delegated such authority within the Financial Regulations. The authority to accept anything other than the lowest quotation or tender will be granted by the DCEO and/or the Principal and CEO of the College.

18. Payment and Payment Terms

Unless a Purchasing card has been used to make a payment, all invoices from suppliers should be entered on to the Finance system and approved in line with the Financial Regulations and then paid by BACS.

The College's standard payment terms are 30 days following receipt of a correct invoice, unless alternative arrangements have been agreed at purchase order stage. Any exceptions should be approved by the Deputy Principal, Finance & Resources.

Where purchases are made using established frameworks, the payment and other terms and conditions are likely to be those of the framework. Before purchasing from any framework, it should be confirmed that it is permissible for the College to use the framework and where required an appropriate access agreement has been checked and agreed by the DCEO.

Payment should only be made on receipt of goods. Where services are being procured, payment for work in progress or agreed interim stages may be appropriate in accordance with the approved guidance and subject to sign off from the DCEO.

19. Aggregation

UK Public Contracts Regulations (PPR2024) set out how and when multiple orders and contract values for the same type of work should be added together for the purposes of deciding what procurement process is applicable.

Aggregation must be considered when expenditure reaches certain thresholds — including the threshold requiring procurement to be advertised on the Governments Contract Finder. To ensure that the College does not fall foul of this, a procurement plan will be required for the College outlining all procurement activities within a twelve (12) month cycle. This will facilitate easy identification of opportunities for aggregation across the College.

> *The specific monetary thresholds triggering aggregation obligations and Contracts Finder advertising requirements are set out in the Financial Regulations, as updated to reflect current PPR2024 guidance. Staff must refer to the current Financial Regulations for the operative figures.*

Should the College identify that specific expenditure is reaching or has exceeded the current UK PCR threshold, then action should be taken to re-procure the goods/services in a compliant manner as a matter of urgency**.**

20. Annual Procurement Plans

The College will establish an annual procurement plan setting out key tender activity and milestones. The plan will include the use of the college's contract list to plan the requirement for future tenders, ongoing reviews of contracts, strategic areas of development, and any policy and procedural developments that are required.

The College is committed to the preparation and the continued development of the procurement plan whilst complying with all relevant legislation.

The practice of renewing annual contracts is not permissible unless specific provision has been made within the original Procurement Process for contract extensions. Re-procurement should feature on the annual procurement plan and be commenced in a timely manner to ensure completion and transfer to a new contract is managed effectively.

To avoid the inefficiencies of re-procuring services annually, the College will review procurement plans and develop multi-year contracts.

21. Tenders

Tendering procedures can in some cases take up to and sometimes longer than six (6) months depending on lifecycle cost and compliance with legislation. Failure to programme sufficient time for procurement will not be a reason to grant a dispensation.

All current and future tenders are advertised in accordance with PPR2024 requirements. It is the responsibility of the budget holder to ensure they comply with guidance within this Procurement Policy and Financial Regulations.

Any post tender bid clarification with suppliers will be led by the DCEO and the budget holder where necessary.

22. Contract Signing and Reporting Requirements

Contracts must be reported to and signed off at the appropriate governance level depending on their value. The specific monetary thresholds determining whether a contract requires sign-off at Finance and Resources Committee level or College Board level are set out in the Financial Regulations.

Staff must refer to the current Financial Regulations for the operative contract-value thresholds before submitting any contract for approval. The relevant report, financial appraisal, and confirmation of budget availability requirements also accompany each threshold band as specified in the Financial Regulations.

- The budget holder, assisted by the DCEO or designate, is required to complete a tender report for all tenders in accordance with UK PCR Rules.

23. Contracts Register

The College will maintain a contract register detailing all procurement activity undertaken, with a value over £100,000 + (including VAT), which records all related documentation, details of the winning bidder, price, duration of contract and the procurement process followed. Budget holders will be expected to support the detailing of all contract data, including historic and new contract arrangements.

24. Equal Treatment of Suppliers

One of the key principles of procurement legislation is that all suppliers are treated equally in any competitive process regardless of value. They should have the same availability of access to specifications, plans, College staff time, facilities etc.

Evaluation criteria should be decided in advance and made available in full to suppliers to show they will be treated fairly.

All bidders are entitled to be debriefed at the end of a process and informed of the winning bidder.

Any discussions and or correspondence prior to the conclusion of procurements should be on a “without commitment” basis and this phrase should be clearly stated on any such correspondence.

The contract offer or purchase order should be the only point at which commitment is made.

25. The Bribery Act 2010 and Economic Crime and Corporate Transparency Act

All staff should also be aware of The Bribery Act 2010, which came into force in April 2011. The College, its employees and contractors/bidders are all covered by the Act; full details are included in the Financial Regulations.

Staff should also be aware of the Economic Crime and Corporate Transparency Act 2023 (ECCTA), which introduced a corporate “failure to prevent fraud” offence. Under this Act, the College may be held liable where a person associated with it – including employees, agents, contractors or subcontractors – commits a fraud intended to benefit the College, unless the College can demonstrate that it had reasonable fraud prevention procedures in place. All staff involved in procurement must therefore act with honesty and integrity at all times, and must not engage in, facilitate, or overlook any fraudulent activity in connection with the procurement, award or management of contracts. Full details of the College’s fraud prevention measures are included in the Financial Regulations.

26. Acceptance of Gifts or Hospitality

The College policy is not to accept any form of gift or hospitality from suppliers that might be seen to compromise the personal judgment or integrity of any member of staff. The Board recognises that there may be occasions when a gift or other benefit is offered that it would be in the College’s interest to accept, without risk of impropriety. Full details are included in the Financial Regulations.

27. Confidentiality and Data Protection

All procurement activity must comply with the College's policies on IT systems and procedures, including e-safety, data security, document retention, and acceptable use. In addition, all activity must adhere to applicable UK data protection and privacy legislation in force at the time of procurement. This includes, but is not limited to:

- The UK General Data Protection Regulation (UK GDPR), which incorporates the retained EU Regulation 2016/679 as adapted for the UK;
- The Data Protection Act 2018;
- The Privacy and Electronic Communications Regulations 2003 (SI 2003/2426), as amended.

Where applicable, procurement must also observe relevant guidance issued by the Information Commissioner's Office (ICO) and any future updates arising from changes in UK law post-Brexit.

The College's Standard Terms and Conditions place explicit obligations on both the College and its suppliers to comply with all relevant data protection, privacy, and IT-related policies and legislation in effect at the time of contract execution.

28. Information Security

All suppliers or third parties that require access to the College's information systems as part of the service they provide must comply with the IT requirements and policies of the College.

Staff responsible for agreeing maintenance and support contracts where access is required must ensure that prior to the contracts being signed, the supplier / third party meets the requirements of the College and will comply with the College safeguarding and security policies.

In the event of the contract being transferred or terminated, appropriate provisions must be in place to ensure the continued security to information and systems. Suppliers / third parties will be asked where appropriate to demonstrate their compliance with the policies.

29. Leases

The College must not enter into any finance leases, as doing so would contravene the requirements set out in the DfE's financial control framework for further education colleges. Under current DfE guidance (post-reclassification), finance leases are treated as forms of borrowing, which require explicit DfE approval and are generally not permitted unless part of a DfE-approved restructuring or capital plan.

The College may enter into operating leases, but these must be approved by either the Deputy Chief Executive Officer (DCEO) or the Principal. All leasing arrangements must comply with the principles of Managing Public Money and the relevant guidance issued by the Department for Education (DfE). Reference must be made to the College's Financial Regulations for detailed guidance on the approval process and classification of leases.

30. Payment in Advance

With the exception of some software licenses, payment should not be made in advance of receipt of goods, services, works or consultancy. If a supplier requests payment in advance then this should be discussed with and approval sought from the DCEO.

Examples of circumstances where payment may be made in advance are:

- Some software licenses
- Prepaid contracts such as mobile phones
- Trips
- Deposits for Building Works/Equipment

31. Health and Safety

When procuring any goods, services or works, employees must ensure that checks are made to confirm that suppliers are suitably experienced and qualified to undertake the work required.

Where building or maintenance works are planned, suitable risk assessments and/or method statements must be in place.

All services, supplies and works procured by the College must comply with the relevant UK Health and Safety legislation in force at the time the items are procured.

Where required by legislation, products (including used or refurbished products) must comply with the relevant UK Laws on the design, supply and operation of products.

32. Retention of Documents

Tender or quotation documentation should be retained for a minimum of six (6) years from the date of the end of the contract. Documentation may be retained electronically rather than in hard copy, however it must be readily accessible for audit or other purposes if required.

All documentation in relation to the procurement process will be retained centrally.

33. Travel, Accommodation and Subsistence

All travel and accommodation should be purchased in accordance with the College's approved procedures, the Financial Regulations and Waltham Forest College Expenses Policy.

34. Monitoring and Audit

The College is subject to scrutiny by internal and external auditors as well as the DFE and other government departments/organisations. It is the responsibility of everyone involved in the purchasing process to ensure that they comply with current policies, procedures, guidance and legislation.

35. Anti-Slavery and Human Trafficking

The College complies with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015 and applies, within its Standard Terms and Conditions, the relevant clauses to ensure that suppliers shall not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK.

36. Ethical Procurement

The College will seek to work with organisations which pledge to incorporate ethical, social, environmental and Fairtrade aspects into their work. The College works towards and follows procurement ethics principles of the Chartered Institute of Procurement and Supply (www.cips.org) and the Crown Commercial Services (www.crowncommercial.gov.uk). In so doing, all procurements are conducted in line with the UK PPR2024 legislation. As much as possible, the College makes use of established procurement frameworks which suppliers are vetted for ethical soundness. As a London Living Wage (LLW) employer, the College expects that all contractors working on its behalf endeavour to pay their staff the London Living Wage or as a minimum National Living Wage.

37. Employment Rights Act 2025

The College is aware of forthcoming changes under the Employment Rights Act 2025, which, from October 2026, will amend the Procurement Act 2023 to prevent the creation of a “two-tier” workforce on outsourced public service contracts. Where the College outsources a service involving the transfer of staff, it will ensure that relevant procurement and contract terms comply with these requirements and any associated statutory code of practice once in force, so that transferring and newly engaged staff delivering the same service are treated no less favourably. Budget holders should factor the potential cost implications of these provisions into procurement planning for affected contracts.