

drb Ignite Multi Academy Trust

Procurement Policy

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1. Policy Statement

- 1.1 The purpose of this Policy is to make the Trust Procurement Policy clear and signpost staff undertaking procurement activity to appropriate procedural guidance.
- 1.2 It is the Trust's policy 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 Public Contracts Regulations, EU Procurement legislation, Bribery Act, Trust financial regulations, Scheme of Delegation and any other requirements of the DfE or ESFA.
- 1.3 This Policy is intended to reflect and support the aims of the Trust by working with staff and suppliers to optimise value for money in the procurement of works, goods, and services. It aims to balance efficiency against risk factors in achieving value for money whilst promoting compliance and sustainability.
- 1.4 This Policy should be read in conjunction with:
 - 1.4.1. Trust Financial Procedures Manual
 - 1.4.2. Trust Scheme of Delegation
- 1.5 The Trust Scheme of Delegation outlines who can award contracts and/or raise orders.
- 1.6 The Trust Procurement Policy is applicable to all purchasing activity regardless of value and should be followed by all staff involved in purchasing whether centrally or School based.
- 1.7 There is a duty on all staff who may be involved in any stage of the procurement process to apply the key principles of best practice procurement to achieve appropriate governance, value for money and suitable quality of goods and services to meet our business needs. To satisfy this requirement, the Trust will provide appropriate procedure guides and templates which must be used.
- 1.8 The Procurement Policy will be reviewed annually or whenever required by a change in legislation.

2. General Principles

2.1 When purchasing and contracting for goods and services, the Trust and its Schools must always demonstrate compliance with procurement legislation and the proper and effective use of public funds. Purchasing procedures should also ensure that the goods, services, and work procured are for the correct quantity and quality, arrive on time and achieve best value. The following general principles must be therefore be adhered to:

- **Transparency and Non-Discrimination:** in all purchasing activity the Trust must ensure that all contractors, suppliers, and service providers are treated equally and without discrimination and must act in a transparent and proportionate manner. Procurement procedures must not be undertaken in a manner which artificially narrows competition, favours, or disadvantages any contractor, supplier, or services provider.
- **Probity:** it must be demonstrable that all parties are dealt with on a fair and equitable basis and that there is no private gain, favouritism or corruption involved in any dealings of the Trust.
- **Accountability:** the Trust is publicly accountable for its expenditure and for the conduct of its affairs.
- **Value for Money:** the achievement of value for money underpins the appropriate use of all public funds, therefore as well as striving to achieve the best price possible for all purchases, consideration should also be given to other factors such as quality, suitability, availability, reliability of the supplier, terms available etc.

3. What is Procurement?

3.1 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.

4. The European Procurement Directives

4.1 As a public body, the Trust and its Schools are subject to European Procurement Directives. The purpose of European Procurement Directives, covering supplies and works and Services, is to encourage and stimulate an open marketplace for public procurement throughout the EU.

4.2 The European Procurement Directives 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.

4.3 Public procurement is also subject to the World Trade Organisation Government Procurement Agreement.

5. Value for Money/Aggregation

5.1 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.

5.2 Purchases over £5,000 must be managed by the DOF and in these cases early involvement is recommended to ensure expectations are clear and timelines are achievable.

5.3 All School purchases in excess of £5,000 (excluding VAT) will require pre-approval from the DOF to confirm the process and budget before an order can be raised.

5.4 Unless below the threshold for obtaining multiple quotations or tenders, all procurement of goods, works, services or consultancy should be acquired 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.

5.5 The Trust has a duty to comply with the requirements of EU Procurement Legislation and Academy Funding Agreements. In order to do so the DOF will review all proposed purchases over £5,000 in the context of total Trust expenditure to come to a decision whether the potential requirement to aggregate is complementary or contrary to the requirement to show value for money.

6. Financial Authority to Commit Expenditure

6.1 Any process which involves committing the Trust or a School to expenditure must be approved in accordance with the Scheme of Delegation. The Scheme of Delegation confirms who has the authority and to what financial level.

6.2 Any member of staff placing a purchase order on behalf of the Trust or a School must be sure that they have the correct level of authority to do so in accordance with the Scheme of Delegation and where required must obtain approval from a more senior member of staff with a higher approval limit if necessary.

- 6.3 The Trust operates a system of devolved financial authority under which Headteachers are responsible for the decision-making process and planning purchasing decisions. In accordance with this Procurement Policy for lower value purchases, the DOF may provide technical and professional support if requested, however where the value of purchases exceed £5,000 the DOF will manage the process on behalf of a School. In these cases, a School is still responsible for specifying requirements, evaluation criteria and committing funding.
- 6.4 No member of staff may approve purchases unless they have been given authority within the Scheme of Delegation to do so.
- 6.5 No employee is authorised to commit the Trust or a School to expenditure without first ensuring that there is adequate budget provision.
- 6.6 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.

7. Purchasing Thresholds

- 7.1 There are two types of threshold governing the procurement for the Trust and Schools. Firstly, authority to commit expenditure, which is covered in the Scheme of Delegation and secondly the procurement process which is governed by the anticipated lifecycle costs of the procurement.
- 7.2 The various transactional thresholds and procurement process required is covered in detail in the associated procurement process guides which must be followed, however, they are outlined briefly below:

Purchasing undertaken by the Trust

- Below £5,000 – a minimum of one written quotation from suitable supplier/contractor.
 - £5,001 - £50,000 – obtain three written quotations from suitable suppliers/contractors.
 - £50,001 - £100,000 – subject to three quotes and business case if necessary unless an appropriate framework can be used and to be managed by the DOF.
 - Over £100,001 compliant tender procedures or use of compliant public framework and to be managed by the DOF.
- 7.3 Where the DOF or their delegated representative are managing a procurement process on behalf of a School, orders will not be raised without approval from the budget holder in accordance with the Scheme of Delegation.

7.4 Occasionally there may be a recommendation to award a contract to, or place an order, with an organisation which has not submitted the lowest priced bid. If this is the case because the scheme has been evaluated using the Most Economically Advantageous method (MEAT) then this is acceptable without further action, provided that the evaluation scores are recorded and retained on file. However, if this is for any other reason approval must be sought before confirming award or raising an order in accordance with the scheme of delegation.

7.5 From 1st April 2019, in the case where contracts may be awarded to companies who the Members, Directors or staff have declared as a related party, there is a requirement to notify the ESFA in advance and to seek ESFA approval for those contract that exceed £20,000 either individually or cumulatively.

8. Dispensations

8.1 In limited circumstances a dispensation from the requirement to obtain alternative quotes may be granted. This may include authority to solicit a single quotation, to award a contract or place an order without having obtained the requisite number of tenders or quotations or to directly award a contract.

8.2 All dispensations from Schools require prior approval from the DOF before progressing and must not result in a breach or procurement legislation or be contrary to the Trust Scheme of Delegation.

8.3 All dispensations from the DOF or their delegated representative require prior approval from the Chief Executive Officer before progressing.

8.4 Full details of the circumstances and reason where a dispensation may be granted are included below:

- All dispensation requests, whether approved or rejected will be reported to the Finance Committee. Staff may be called upon to attend the Finance Committee to explain the reasons for requesting a dispensation.
- Dispensations 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.
- All dispensations will be subject to obtaining and documenting appropriate evidence for single quotation/tender action; obtaining authorisation for such action in accordance with the approved Scheme of Delegation and never breaching current Public Contract Regulations.

- 8.5 Subject to approval as outlined in the Trust's Scheme of Delegation, dispensations may be granted for the following reasons:
- Unforeseen emergency requirement.
 - The goods or services are only available from one source and there is no possibility of the Trust'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 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 VFM analysis must be documented) and only for use in circumstances to be approved in accordance with the Scheme of Delegation, under specific advice of the DOF in terms of compliance with the EU and UK legislation and subject to approval by the CEO and subsequently reported to the Finance Committee.
- 8.6 The DOF or their delegated representative may develop a schedule of dispensations for specific areas which School staff may use under certain circumstances.
- 8.7 A record of the reason(s) for the seeking and granting/declining of dispensations will be kept for at least three years.

9. Raising Orders

- 9.1 Following the raising of a requisition which must be approved in accordance with the Scheme of Delegation (to enable the School office to raise an order), official orders must be raised for all goods, works, services and/or consultancy required by the Trust or a School using Access Finance (the Trust's financial operating system), unless specifically exempted. The procurement procedures guidance documents in the purchasing process must contain adequate controls to ensure that:
- Official orders are raised in respect of all goods, services and works required by the Trust and its Schools, except for those specifically exempted.
 - Only goods, services and works required by the Trust and its Schools are 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 costs, 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 approved Scheme of Delegation and the Trust'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.

9.2 No orders shall be placed, or contracts altered or extended, with the intention of avoiding the relevant thresholds applicable within these Financial Regulations. In the event that the terms of any purchase order or contract have to be amended, an official variation order must be approved in accordance with the Scheme of Delegation and issued by the School Business Manager/Office Manager/DOF or their delegated representative as appropriate.

10. Debit Cards

10.1 The Trust recognises the benefits of debit cards as an alternative means of paying for goods and services. The advantages include reducing paperwork, reduced administration time and costs, the opportunity to make online purchases and seek discounts from suppliers on the basis that they receive immediate payment.

10.2 Debit cards are particularly suitable for high volume, low value purchases, booking off site visits and for site staff to order building materials etc.

11. Supplier Management

11.1 New suppliers may only be added to the Access Financial system following completion of a new supplier form and the requisite vetting procedures.

11.2 All staff who may raise purchase orders for work should satisfy themselves that where required, contractors have appropriate DBS clearance before raising an order for work. The Trust will issue guidance for the safeguarding of pupils whilst contractors are on site which must be followed.

12. Competition

12.1 Competition should be proportionate to the level of expenditure, complexity, and risk. To minimise procurement costs for the Trust and suppliers, avoid doubt and ensure compliance with legislation, best practice and Trust Financial regulations, procedures documents and templates for procurement at all levels have been provided which must be followed.

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

- 12.3 Any minimum standards should be proportionate to the contract and not discriminatory other than where legally required.
- 12.4 All requests for quotations must be made using the appropriate templates and in accordance with the guidance most relevant to the estimated value of expenditure.
- 12.5 When estimating the value of a contract, unless it is a one-off cost, the actual costs of the works, goods or services must be for the whole life costs and include any on-going costs. Once the whole life costs have been estimated the appropriate procurement procedure should be followed.

12. Contract Agreement/Terms and Conditions

- 12.1 All procurement should be carried out using the Trust's terms and conditions as outlined in the various procurement procedure guides and templates. 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 Trust terms and conditions must be approved by the DOF before agreement is made.
- 12.2 Any agreement, contract or lease with a supplier which requires a signature by a member of the Trust or Headteacher (not including general orders for goods and services) should be forwarded to the DOF or their delegated representative for review prior to signature.
- 12.3 A signature on an agreement or contract, or even an email response indicates that the Trust or School accepts the suppliers Terms and Conditions which may not be favourable.
- 12.4 Following the identification of the most favourable offer for the Trust, or its Schools, whether by best value, quotation or tender, consistent with the thresholds identified above, the contract may only be awarded by those officers to whom the Trust Board has delegated such authority within the approved Scheme of Delegation. The required authority to accept other than the lowest quotation or tender is also included within the Scheme of Delegation.

13. Payment and Payment Terms

- 13.1 All invoices from suppliers should be entered on the Access finance system once approved and then paid by BACS. Only in circumstances where BACS is not available, should a credit card payment be made.
- 13.2 The Trusts standard payment terms are 30 days following receipt of a correct invoice, unless alternative arrangements have been agreed at purchase order stage.

13.3 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 Trust or a School to use the framework and where required an appropriate access agreement has been approved by the DOF.

13.4 Payment should only be made on receipt of goods. Where services are being procured then 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 DOF.

14. Aggregation

14.1 EU legislation sets 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.

14.2 Should a School or the Trust identify that specific expenditure is reaching or has exceeded the current EU threshold then action should be taken to re-procure the goods/services in a compliant manner as a matter of urgency. The DOF or their delegated representative will review half-termly reports to ensure that this is the case.

14.3 In appropriate circumstances the DOF or their delegated representative may identify opportunities to establish locality or corporate contracts on behalf of Schools. Schools will be invited to participate, however in such cases the DOF or their delegated representative will work on the basis that this expenditure does aggregate and procure accordingly.

15. Annual Procurement Plans

15.1 The DOF or their delegated representative will complete an Annual Procurement Plan setting out key tender activity and milestones. The plan will include the use of the contract list to plan the requirement for future tenders, ongoing reviews of contracts, strategic areas of development, and any policy and procedural development that are required.

15.2 The Trust is committed to the preparation and the continued development of the procurement plan. The DOF or their delegated representative will continually review the procurement requirements of the Trust and Schools whilst complying with all relevant legislation.

15.3 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.

- 15.4 To avoid the inefficiencies of re-procuring services annually, the DOF or their delegated representative will work with Schools to review procurement plans and develop multi-year contracts.

16. Tenders

- 16.1 Any expenditure over £25,000 must be subject to tendering in accordance with Trust Financial Regulations and UK Public Contract Regulations 2015 and if the anticipated value is over the current threshold then also in accordance with EU procurement legislation.
- 16.2 All tendering where the anticipated lifecycle costs are in excess of £25,000 must be undertaken by the DOF or their delegated representative.
- 16.3 The DOF or their delegated representative will select and manage the most appropriate procurement process in accordance with the anticipated value, any potential aggregation and Trust tendering guidelines which are compliant with current procurement legislation. This may include the use of frameworks or bespoke tenders.
- 16.4 Tendering procedures may take up to six months depending on lifecycle costs and compliance with legislation. Failure to programme sufficient time for procurement will not be reason to grant a dispensation.
- 16.5 It is the responsibility of the DOF or their delegated representative to carry out tenders for goods, services and works on behalf of the Trust and Schools.
- 16.6 Any post tender bid clarification with suppliers will be led by the DOF or their delegated representative.
- 16.7 Any communication with the suppliers involved in the tender process will be facilitated by the DOF or their delegated representative.

17. Standards of Business Conduct

- 17.1 In limited circumstances, with the approval of the CEO, the DOF may directly award certain contracts without the need to conduct a competitive process, provided that all such instances are compliant with EU and UK procurement legislation and the circumstances are subsequently reported to the Finance Committee with a record of the justification for the direct awarding being retained for three years.

18. Reporting Requirements

- 18.1 For all contracts between £25,000 and £100,000 (excluding VAT) the decision and criteria should be reported to the Finance Committee.
- 18.2 For all contracts in excess of £100,000 (excluding VAT) a report should be prepared for the Trust Board, highlighting the relevant issues and recommending a decision.

18.3 All contracts whose value is over £100,000 (excluding VAT) must be authorised by the Trust Board. In cases where, due to the timing of the Board meetings, this would not be practicable and any undue delay would cause significant operational issues, the CEO acting jointly with the Chair of the Trust Board may accept a tender in excess of £100,000 but this must be reported to the next meeting of the Trust Board.

18.4 The DOF or their delegated representative is required to complete a tender report for all tenders in accordance with EU procurement legislation.

19. Contracts Register

19.1 The DOF or their delegated representative will maintain a contract register detailing all procurement activity undertaken, which records all related documentation, details of the winning bidder, price, duration of the contract and the procurement process followed.

20. Equal Treatment of Suppliers

20.1 One of the key principals 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, Trust staff time, facilities etc.

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

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

20.4 Any discussions and or correspondence prior to the conclusion of procurement 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.

21. The Bribery Act 2010

21.1 All staff should also be aware of The Bribery Act 2010, which came into force in April 2011. The Trust, its employees and contractors/bidders are all covered by the Act. To meet our obligations under the Act, the Trust has a Gifts, Hospitality and Bribery Policy and all employees involved in procurement should be familiar with the policy.

22. Acceptance of Gifts and Hospitality

22.1 The Trust's policy is not to accept any form of gift or hospitality from suppliers: full details and guidance are included in the Trust Gifts, Hospitality and Bribery Policy.

23. Confidentiality (FOI)

- 23.1** The Freedom of Information Act 2000 gives the public and potential suppliers the right to request certain information regarding School and Trust policy purchasing. All such requests should be handled in accordance with the Trust policy.
- 23.2** As part of the process for providing quotations and tenders, the Trust requires all bidders to identify confidential information which they would not want the Trust to disclose in response to a freedom of information request.

24. Information Security

- 24.1** All suppliers or third parties that require access to the Trust or School information systems as part of the service they provide must comply with data protection legislation and safeguarding Policies.
- 24.2** Staff responsible for agreeing maintenance and support contracts where access is required must ensure that prior to the contracts being signed that suppliers/third parties meet the data protection legislation and safeguarding Policies.
- 24.3** In the event of the contract being transferred or terminated, appropriate provision must be in place to ensure the continued security of information and systems. Suppliers/third parties will be asked, where appropriate to demonstrate their compliance with the Policies.

25. Leases

- 25.1** The Trust are now able to enter into any finance lease as per the below criteria due to the Secretary of State's consent for particular classes of leased asset (listed below). Leases for items on this list will therefore not need to be submitted to the department for approval:
- all existing leases already in place by 1 April 2022 (maintained schools) and 1 September 2022 (academies).
 - IT equipment.
 - telephony.
 - catering equipment.
 - furniture.
 - bathroom/sanitary equipment.
 - gym equipment.
 - grounds keeping equipment.
 - minibuses and other vehicles for the use of the school.
 - temporary classrooms and equivalent structures.

25.2 The Trust may enter into operating leases; however, this is subject to the approval of the DOF.

26. Payment in Advance

26.0 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 this should be discussed with an approval sought from the DOF.

27. Health and Safety

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

27.2 Where buildings or maintenance work is planned, suitable risk assessments and/or method statements must be in place and if required School change approval must be sought.

27.3 All services, supply and works procured by the Trust must comply with the relevant UK and European health and safety legislation in force at the time the items are procured.

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

28. Separation of Duties

28.1 There are a number of processes in purchasing goods and services. There must be adequate separation of duties to ensure that the process of ordering goods, services and works, checking receipt/completion and authorising of payment is not the responsibility of one person. In some smaller Schools this may be difficult; however, in all cases the appropriate guidance must be followed.

28.2 Where the DOF or their delegated representative undertake tendering exercises, either on behalf of a School or for the Trust, the receipt and custody of tenders prior to opening must be separated from the specification, selection and evaluation. Contract awards subject to tendering will be subject to approval of the procurement procedure undertaken and in accordance with the Scheme of Delegation.

29. Retention of Documents

29.1 All documentation and communication (including emails) relating to purchases or tenders should be kept and maintained within a contracts folder or online filing system. This will enable easy location of all electronic records relating to a purchase for audit purposes.

- 29.2 Tender or quotation documentation should be retained for a minimum of five 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.
- 29.3 The Central Finance Team are required to maintain a contract register for all purchases with lifecycle costs of over £25,000.
- 29.4 Where the procurement is undertaken on behalf of the School by the DOF or their delegated representative, all documentation in relation to the procurement process will be retained centrally. Schools need not hold local copies and can rely on notification from the DOF that the Trust financial regulations and relevant procurement legislation has been complied with. The records held centrally are available should auditors wish to inspect them.

30. Travel and Accommodation

- 30.1 All travel and accommodation should be purchased in accordance with the Business Expenses Policy and the cost claimed back through the staff expenses procedure.


31. Disposal of Redundant Equipment

- 31.1 Wherever possible where equipment is no longer required by a School or the Trust, alternative internal uses should be sought, however where this is not possible or there is no interest then it is permissible to dispose of by sale to suppliers or the general public.
- 31.2 In all cases where external disposal is proposed this must be carried out with the approval of the DOF. Disposals must also be in accordance with the Financial Procedures Manual.
- 31.3 Any proposed disposal/sale must comply with the current Waste Electrical and Electronic Equipment (WEEE) regulations.

32. Monitoring and Audit

- 32.1 The Trust and Schools are subject to scrutiny by internal and external auditors as well as the ESFA 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.

33. Change Management

Monitoring and review:	CEO Trust Board
Links:	Scheme of Delegation Financial Procedures Manual
Staff responsible:	Director of Finance (CFO)
Committee responsible:	Finance Committee
Date approved:	March 2023
Next review:	March 2024
Sign off by Chair of Trust:	 Date: March 2023

- * Please note that should there be any changes/further national guidance issued relevant to this Policy, it will be updated accordingly prior to the review date shown above and referred to the next Trust Board meeting.