

**Document Control Table**

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Key Notes:	<ul style="list-style-type: none"> <li>- This version further separates the Procurement Policy from Procurement Guidelines – making a clearer distinction between them and therefore more easily understood and applied.</li> <li>- This version is updated to reflect the introduction of the Procurement Act 2023 which has replaced The Procurement Contracts Regulations 2015 (PCR15)</li> <li>- We have changed the title “Waivers” and “Single Tender Process” (STP) to Direct Award Process – there is much debate in the HE Procurement sector on this as the word Waiver implies a work around to Procurement Regulations. Direct Award Process reflects better the process which is being undertaken.</li> </ul>		

**Document History**

Version	Date	Author	Notes
V1.0	11 June 2021	Suzanna Hinnell	Created using Communications & Engagement Framework and updated following input from UEB

V1.1	19 November 2021	Joanne Davies	Updates to policy to improve / streamline processes and reflect changes in Regulations
V1.2	15 December 2021	Joanne Davies	Updates to policy to improve / streamline processes and reflect changes in Regulations
V2	March 2023	Phil Davies	Annual review of Policy – separating Policy and Guidelines
V3	November 2025	Phil Davies	Updates to reflect new Regulations – Procurement Act 2023 and associated Regulations and the introduction of Responsible Procurement Policy. Also further separates Policy and Guidelines.



**CARDIFF UNIVERSITY**

**PROCUREMENT POLICY**  
**November 2025**

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## 1. INTRODUCTION

Procurement Services has functional responsibility, within a devolved purchasing environment, for overall procurement governance, policy, strategy, processes, procedures, risk, controls, standards, performance management and the promotion of best practice.

## 2. PURPOSE OF THE POLICY

The purpose of this Policy is to ensure all procurement undertaken by the University is performed consistently, ethically, sustainably, in full compliance with current Legislation and Regulations and optimises value for money.

## 3. SCOPE OF THE POLICY

This Policy covers all staff and members of the University community involved in the University's procurement activities with third party suppliers, regardless of the value (including where there is a contractual relationship without financial consideration) or source of funds and including Individual Scholarship Budgets and Individual Research Budgets.

This Policy does not apply to:

- Contracts with Research Partners (however goods and services purchased to deliver the outcomes of a grant, including sole source goods and services, are within scope of this Policy)
- Payments to Statutory Authorities
- Arrangements for Cardiff University to supply goods or services via internal trade or to third parties such as catering services provided by the University Catering Service
- Suppliers that provide student placements as part of their degree course

Categories exempted by the Procurement Act 2023 (PA2023) including:

- Works of art, museum specimens or historical documents
- Acquisition or rental of land, existing buildings or other immovable property
- Arbitration or conciliation services
- Legal services where the lawyer is representing the University in arbitration or conciliation or judicial proceedings or where there is a tangible indication and high probability that the issue will go to arbitration, conciliation or court
- Financial services in connection with the issue, sale or purchase of securities or loans
- Employment contracts for University staff
- The exemption for contracts for research and development (R&D) services at paragraph 22 of PA2023 applies where the services are intended to be for or result in a public benefit and provided the contract does not include goods or works

## 4. PROCUREMENT PRACTICE

Procurement at the University is devolved to budget holders who are empowered to purchase within a framework of financial procedures and regulations designed to ensure probity & accountability for purchasing decisions. ([Delegation of Financial Authorities Framework](#))

- The University seeks to use national, regional or institutional contracts/frameworks to satisfy its needs whenever practicable.
- Regardless of value, where university-wide contracts with pre-approved suppliers are available these must be used for all relevant purchases. These contracts, including approved Framework Agreements, cover a wide range of goods and services and will be kept updated on the Procurement intranet pages. The contracts and suppliers have been selected using competitive procedures, meet set quality standards and the contracts are actively managed.
- The University pursues progressive increases in the amount of appropriate procurement opportunities made available over time to interested suppliers through web-based mediums e.g. Sell2Wales.
- The University pursues optimised competition in its purchasing activities, consistent with the requirements of its own financial procedures and regulations.
- When engaging with the market, the University develops and applies contract evaluation/award criteria fairly and reasonably proportionate to requirement and risk, being mindful always of the need for equality of treatment and to provide constructive de-briefing to unsuccessful tenderers, where requested.
- The University continually monitors and manages the risks associated with any perceived or actual conflicts of interest in procurement processes.
- The University aligns its procurement activities with the Corporate Code of Ethics of the Chartered Institute of Procurement & Supply, which it will expect individuals with purchasing responsibility to respect. (CIPS Code of Ethics.)
- The University considers the application of Responsible Procurement as an integral consideration in relevant procurements, whenever practicable.
- A procurement intranet site is maintained which will provide clear and comprehensive guidelines to inform and support devolved purchasing activities.

## **5. PROCUREMENT ACT 2023**

The regulations set out the procedures which must be followed before awarding a contract when its value exceeds set thresholds (see section 6).

Where the Procurement Act 2023 regulations do not apply, the University must still assess the proposed arrangement in the context of the following principles:

- A degree of advertising which is proportionate to the scale of the contract
- Non-discrimination
- Equality of treatment
- Transparency
- Mutual recognition
- Proportionality
- Compliance with Responsible Procurement Policy

## **6. THRESHOLDS**

Thresholds determine the procurement procedure that needs to be followed for all spend according to the estimated Total Contract Value, not on an individual purchase order value.

Total Contract Value must be calculated:

- On the total amount payable including any form of option and renewals
- Gross (including) VAT
- Not subdividing the requirement unless justified by objective reasons

- By calculating the total anticipated spend across the University (not subdividing by School/Department/grant)
- Taking the maximum estimated value for any Framework or Dynamic Market
- For annual software licences or annual manufacturer maintenance agreements, over a period of 4 years

The below procurement procedure according to the University Threshold (aligned to the Procurement Act 2023 and University Financial Regulations) must be followed.

Total Contract Value (Including VAT)	Applicable Regulations	Tendering Procedure	Procurement Lead
Under £6,000	University Financial Regulations	Discretion to decide whether to obtain three quotations. A proportional risk-based approach must be taken that considers the risk associated with the purchase and a contractual agreement put in place. Consideration must be given to which Terms and Conditions are applied. The default should be Cardiff University Terms and Conditions.	Customer Lead
£6,000 - £29,999	University Financial Regulations	At least three quotations or a completed sub £30,000 Direct Award Process. A proportional risk-based approach must be taken that considers the risk associated with the purchase and a more robust contractual agreement put in place. Consideration must be given to which Terms and Conditions are applied. The default should be Cardiff University Terms and Conditions.	Customer Lead
£30,000 - £ 207,720	University Financial Regulations	Competitive sealed Tenders or approved Direct Award Process.	Procurement Services

Over £207,720 for goods & services ( <i>Above threshold</i> )	Procurement Act 2023 & University Financial Regulations	Regulation compliant Tender process or approved Direct Award Process.	Procurement Services
Over £5,193,000 for works ( <i>Above threshold</i> )	Procurement Act 2023 & University Financial Regulations	Regulation compliant Tender procedure	Procurement Services

Where funders' thresholds or procedures differ, the above should be treated as the minimum requirement, and in all cases the Procurement Act 2023 must be adhered to.

## 7. DIRECT AWARD PROCESS: (Previously Waivers / Single Tender Process)

The use of a Direct Award Process is an exception to the routine procurement process. Competitive bids must be sought for all goods, works and services with a Total Contract Value of over £6,000 (incl VAT) - except in the circumstances set out in this section of the Policy.

The Direct Award Process and exemptions cannot override the obligations to adhere to the Regulations or a Funders' terms and conditions, except in an emergency or to provide limited continuity of service whilst a procurement exercise in accordance with this Policy is undertaken.

Exemption from seeking quotations or competitive tendering is permitted for the procurement of goods, works and services:

- With a Total Contract Value of under £6,000 (incl VAT) without the requirement for any Direct Award
- That are required in circumstances of extreme urgency that could not have been reasonably foreseen, are not of the University's making and are necessary for the University to comply with our statutory obligations with an approved Direct Award
- Which are available only as proprietary or patented articles, services or works from one Supplier and for which there is no reasonably satisfactory alternative available, with an approved Direct Award
- That must be compatible with existing equipment, machinery, systems or software, where the goods and services can only be provided by the Original Equipment Manufacturer (OEM) in order to preserve warranties or expand existing systems with an approved Direct Award
- For collaborative research, whereby the equipment required must be the same as that of Research Partners to ensure uniformity and coherence of research outputs and results with an approved Direct Award
- When part exchanging equipment or machinery with the original manufacturer with an approved Direct Award
- That are second-hand or ex-demonstration models with an approved Direct Award Process, except for those which are above threshold
- For the provision of International Recruitment Agency services, without the requirement for any Direct Award
- Where a grant funder mandates a named Supplier and this is confirmed in the grant award letter or other formal documentation from the grant funder, with an approved Direct Award Process
- Where it was not possible, following advertisement, to secure competition, with an approved Direct Award Process.

A Direct Award is required for new requirements where the competitive process cannot be followed as well as for extensions to contracts where there is no specific provision.

The value of a Direct Award must be the Total Contract Value, plus the value of any previously approved Direct Award related to the same project.

Requests for a Direct Award or exemptions must be approved in compliance with the below table.

Total Contract Value (incl VAT)	Chief Financial Officer	Director of Procurement	Senior Category Manager	Head of School / Department	Head of School Finance	Financial Approver
£6,000 - £29,999	No	No	No	Yes	No	Yes
£30,000 - £99,999	No	No	Yes	No	No	Yes
£100,000 - £499,999	No	Yes	Yes	Yes	Yes	Yes
£500,000 to £1,999,999	Yes	Yes	Yes	Yes	Yes	Yes
Over £2,000,000	Yes	Yes	Yes	Yes	Yes	Yes

All Direct Awards for procurements with a Total Contract Value between £6,000 - £29,999 (incl VAT) once approved must be held locally with the Financial approver / Finance Manager. These should be kept available for audit and reporting purposes.

As part of the annual Procurement Services update report to F&RC, a detailed summary of all Direct Award Process with a Total Contract Value of £30,000 (incl VAT) and above will be contained.

Direct Awards for procurements with a Total Contract Value of £30,000 (Incl VAT) and above will be requested through completion of the relevant sections of a Procurement Plan. The Procurement Lead is responsible for gathering the relevant information and creating the Procurement Plan with input from all relevant stakeholders.

The Procurement Lead will obtain the other necessary approvals and keep a copy of the approved Procurement Plan in the tender file.

Procurement Services will keep copies of all completed Procurement Plans on file and will support the Customer Lead with contract creation.

## 8. PURCHASE ORDERS - 'No PO, No Pay'

Customer Leads must ensure a Purchase Order (PO) is issued, which includes the tender reference number where applicable, to Suppliers in advance of any type of commitment, goods being delivered and works and services commencing, except where an exemption has been agreed in advance with the Director of Procurement or where using a Purchasing Card. ([PCard Policy](#))

Invoices will not be paid without a three-way match of PO, receipt and invoice unless an exception has been agreed as above.

The 'No PO, No Pay' Policy supports:

- Financial planning
- Invoice processing efficiency
- Fraud risk mitigation
- Adherence to the University's Financial Regulations

## 9. SECOND-HAND GOODS

In some circumstances the University may obtain best value for money by purchasing second hand Goods rather than purchasing new. This carries inherent risks regarding provenance, quality, fitness for purpose, warranties, delivery etc.

Where second hand Goods are to be purchased through an auction or an e-auction site the Customer Lead together with the Procurement Lead will draft a Direct Award, prior to engaging or bidding, to include the following; full details of the goods, their provenance, warranties, original/new price of the Goods, estimated price of the Goods if they were to be purchased through a bona fide reseller, the sellers details, the maximum price that the University will bid for the Goods.

The Director of Procurement must approve the Direct Award process in advance of commencing the procurement.

Under no circumstances should second hand Goods be purchased from members of staff, relatives of members of staff, students or private individuals.

## 10. ROLES & RESPONSIBILITIES

The Director of Procurement is responsible for providing and operating a Procurement Service that contributes to achieving the aims of the Our Future, Together strategy.

As defined in the Procurement Strategy 2025 – 2028, the Director of Procurement will provide a service: Structured to meet the needs of our Students, Academics and Professional Services staff for goods, services and capital projects with a Procurement Service that offers value for money and innovation through compliant, responsible and sustainable solutions.

**The Director of Procurement** is also responsible for establishing a compliance framework for this Procurement Policy and will report annually on performance of the function to F&RC.

**The Procurement Lead** is the member of Procurement Services allocated to lead an individual procurement with a Total Contract Value of £30,000 (incl VAT) and above, working with the Customer Lead to identify and achieve the procurement's objectives.

**The Head of School/Department** is accountable for ensuring all staff in their School/Department comply with this Procurement Policy to obtain best value for money, taking the necessary remedial action where the Policy is breached. For contracts with a Total Contract Value of £30,000 (incl VAT) and above they must ensure resources are available to assist Procurement Services with developing the specification and evaluation criteria, to evaluate Tenders received and ensure a Contract Manager is allocated.

**The Financial Approver** is responsible for confirming that funding exists for the proposed contract for its full duration and ensuring that best value is obtained.

**The Customer Lead** provides an in-depth knowledge, as the Subject Matter Expert, of the requirement, acting as the School/Department/University lead on the procurement and development of the specification. The Customer Lead must ensure that sufficient budgetary provision has been agreed with the Financial Approver prior to any Procurement exercise being undertaken. The Customer Lead must comply with this Procurement Policy, including: following the appropriate procedure for the value of spend, contacting Procurement Services prior to commencing any procurement activity where the anticipated Total Contract Value is £30,000 (incl VAT) and above and ensuring a Purchase Order is raised in accordance with this Policy.

**Heads of School Finance** must act as Policy gatekeepers to provide support, guidance and signposting to ensure that expenditure follows this Policy, and that Procurement Services are given as much advance notice as possible to plan and support Customer Leads. Heads of School Finance, where necessary, will provide support for Customer Leads in the ordering and receipting of goods, works and services.

**The Contract Manager** is the allocated member of the Customer team who is responsible for the day-to-day management and performance monitoring of the contract. It is their responsibility to confirm that goods and/or services have been delivered in full compliance with the terms of the contract. They must follow Procurement Guidance and Procurement Policy to manage contract variations, performance management, disputes or potential contract termination.

The Procurement Lead will support the Contract Manager with all periodic contract reviews and will be the point of escalation in the rectification process of any non-rectified contractual disputes.

**Contract Signatories** are responsible for ensuring the required approvals have been obtained to award the Contract and that the terms of the contract are acceptable to the University before signing contracts within their delegated authority (as set out in the Delegation of Financial Authority Framework – section 13.2).

## **11. EQUALITY, DIVERSITY AND INCLUSION**

The University is committed to supporting, developing and promoting Equality, Diversity and Inclusion (EDI) in all its activities.

The University strives to ensure its services are accessible to everyone and promotes understanding of the differing needs of staff and students and the community we serve. By embedding EDI in service delivery, we ensure the services the University provides meet the diverse needs of different groups.

The University's procurement practices, as relevant and reasonably required, ensure compliance with, and the embracing of, legislation and recommended good practices relating to ethical employment in supply chains and the abolition of modern slavery and human trafficking in commercial activities.

## **12. ETHICS, FRAUD & CONFLICTS OF INTEREST**

All staff and members of the University community who are engaged in procurement and purchasing/buying activities on behalf of the University, members of the Chartered Institute of Purchasing and Supply (CIPS) or not, will abide by the CIPS Code of Ethics.

Conflicts of interest (COIs) are any actual, potential or perceived conflicts or personal interests that must be declared for any individual who influences or is directly involved in a procurement and include:

- any personal interest in a purchasing decision e.g. being a Director/owner, employee, shareholder or ex-employee
- any connection to a relative or close friend of someone with a personal interest in the goods or services being purchased or who could be personally affected by the purchasing decision e.g. contracting, or proposing that a colleague contracts with a family member
- any personal obligations, loyalties, memberships or bias that could influence the way you evaluate offers and recommend purchases
- if within the last 12 months you have been offered any special discounts, gifts, trips, hospitality, rewards or favours by a Supplier of the goods or services being purchased
- if you are aware of anything that could give the appearance that you might be biased towards or against a particular Supplier.

Staff and members of the University community who are involved in any aspect of the procurement process are responsible for reporting any actual, potential or perceived COIs:

- Those involved in purchases with a Total Contract Value of under £30,000 (incl VAT) must notify Procurement Services of any potential perceived conflict, as included in their Declaration of Interest or not, as soon as it is identified by them.
- Those involved in developing specifications for procurements with a Total Contract Value of £30,000 (incl VAT) and above must notify Procurement Services of any potential perceived conflict, as included in their Declaration of Interest or not, as soon as it is identified by them.
- For procurements with a Total Contract Value of £30,000 (incl VAT) and above all members of evaluation panels or those who influence Supplier selection where competition is waived must complete and return a COI form to Procurement Services (or Head of International Recruitment for International Recruitment Agents' contracting) even if to declare no conflict has been identified.
- Where contracts are to be varied, extended or renewed, those involved in the original procurement must notify Procurement Services of any new potential perceived conflicts. For any individual involved in the procurement process for the first time at the time of variation, extension or renewal, the appropriate process above must be followed.
- Conflicts must be reported to the Director of Procurement by members of Procurement Services as soon as any potential perceived conflict of interest arises with any aspects of the team member's role.
- Procurement Leads, will complete an annual COI and will report any Conflicts they have with a procurement to their respective line manager.
- Conflicts must be reported to the Chief Financial Officer by the Director of Procurement as soon as any potential perceived conflict of interest arises with any aspects of the Director of Procurement role.

On receipt of information about any actual, potential or perceived COI, Procurement Services must evaluate the risk and decide what mitigating action (if any) should be taken to manage the conflict, or if the individual should be removed from the procurement process.

Procurement Services/Head of International Recruitment must complete records of the conflict and management response and keep them on the relevant tender file.

All ITTs for procurements with a Total Contract Value of £30,000 (incl VAT) and above requires Suppliers to complete and return a signed the relevant tender file.

For fairness and transparency, staff and members of the University community who are engaged in procurement and purchasing/buying activities on behalf of the University when in contact with potential Suppliers, must not:

- pass information to Suppliers, meet, have discussions or make comments regarding formal procurement processes unless authorised by Procurement Services.
- receive any inducements, or gifts and hospitality except in compliance with the Gifts and Hospitality Policy.
- share details about a procurement outside the immediate tender team without prior approval from Procurement Services.

The University's Conflict of Interest and Confidentiality (COI) form can be found on our intranet or by following the link: [Conflict of Interest Form](#)

### **13. RESPONSIBLE PROCUREMENT POLICY**

Procurement is recognised as a key driver in securing broader Environmental, Social and Governance (ESG) benefits for the city, region, and nation such as decarbonisation, fair trade and labour practices and support for local businesses and communities. The Responsible Procurement Policy was published in July 2024 and introduces ESG considerations into our purchasing decisions. The policy lays the foundations to a three-year programme which includes:

- Embedding the policy into the procurement process
- Introducing a Supplier Code of Conduct to our supply chain
- Evaluating our scope 3 emissions to set realistic and aspirational targets to reduce
- Promoting training and engagement within the University and with our supply chain
- Advocate in the recruitment of sustainability related roles
- Accreditation under ISO 20400:2017

The aims of this policy are to meet its need for goods, services, and works in a way that achieves value for money and delivers the optimal ESG impact throughout the whole life cycle of the product or service being procured.

The policy also aids in increasing awareness and engagement regarding ESG risks, encouraging the University to be more considerate in its practices, and further working towards our vision to build an inclusive, responsible and resilient future for our Community, Cardiff, Wales and the wider World.

The Responsible Procurement Policy can be found on our intranet or by following the link below:

[Responsible Procurement Policy](#)

The Procurement Guidelines outline how the Responsible Procurement Policy has been embedded into the University's procurement process.

#### **14. WELSH LANGUAGE ACT**

The University specifies in tender documents and contracts any particular requirements as to the use of Welsh and will monitor the fulfilment of any such requirements by contractors.

Tender documentation and opportunity listings on Sell2Wales will be issued and submissions accepted in English and/or Welsh consistent with the subject matter of the contract and the requirements of the Welsh Language [Wales] Measure 2011 (and any future iterations thereto).

#### **15. PROCUREMENT GUIDELINES**

Full guidance on each stage of a procurement can be found on the Procurement intranet site: [Procurement-Guidelines-V3-English.pdf](#). Please ensure you read the document, are familiar with the areas relevant to your respective procurement and remain up to date, as the document will be regularly revised.

#### **16. REVIEWS**

The Director of Procurement is responsible for ensuring this Policy and the Procurement Guidelines are regularly reviewed and amended to update any changes in legislation, Regulation, procedure or best practice. Any material changes to the Procurement Policy must be approved by UEB and supported with a communication plan.

The Director of Procurement may make:

- minor changes that make no material difference to the Procurement Policy without further approval;
- and
- any changes to the Procurement Guidelines without further approval.