

## **PROCUREMENT AND PURCHASING POLICY**

### **1. Introduction**

#### **1.1 Purpose**

This Purchasing Policy sets out the University's expectations with regard to the purchase of all goods, services and works in order to achieve the best possible value for money from University funds.

The Policy sets out guidance and rules to ensure the requirements of the Financial Regulations are met, along with the University's external regulatory obligations. As a key financial policy, it forms a core part of the "financial framework" (Financial Regulations, financial policies and financial systems).

#### **1.2 Scope**

This Policy applies to all purchases of goods, services and works by the University and its subsidiary undertakings and joint ventures, except where the University's Audit and Risk Committee has approved an alternative policy for a specific subsidiary undertaking or joint venture. It applies irrespective of the source of funding for a purchase, and to purchases undertaken by all members of staff in connection with their University duties. The term 'members of staff' includes University staff and any other individual authorised to undertake purchasing activity on behalf of the University.

This Policy sets out all approved methods of purchasing at the University, and outlines when it is appropriate to use them. For the purposes of this Policy, the words 'purchasing' and 'purchases' refer to the following means of buying goods, services and works:

- University purchase orders
- University purchasing cards
- out of pocket expenses
- advance of funds
- petty cash
- any other purchasing method subject to specific written dispensation of the Director of Finance.

The direct employment of staff is not considered a purchase of goods and/or services and is covered by Human Resource policies. However, the appointment of staff from agencies or through commercial contracts with individuals to provide consultancy or other services (often through Personal Service Companies), is covered by this Policy. As part of the engagement of staff, through agencies or other contractual routes, an assessment of their tax status and consideration of whether they fall under HMRC IR35 regulations is required in

line with the University's Off Payroll Working Policy. This is facilitated by the University's Managed Service for Non-Permanent Workers referenced in Purchasing Guide 1 - Finding the right supplier.

### **1.3 Items not considered to be an appropriate use of University funds**

The following are items of expenditure that are not an appropriate use of University funds. If you are in any way unsure about whether expenditure is appropriate you should contact the Finance Service desk for advice.

Any expenditure of University funds which is not in accordance with this policy is considered to be a breach of the University Financial Regulations and may be recovered from the individual(s) responsible unless it has been authorised in advance by the Director of Finance.

- day-to-day living expenses (e.g. toiletries, clothing, newspapers and snacks)
- traffic fines
- travel between home and usual place of work
- privately arranged travel insurance for UK or overseas travel away from campus – the University insurance provision must be used
- formal attire (dinner jacket or ball gown) to attend formal functions
- kennel/cattery costs or vets' fees and similar expenditure
- contributions to political parties
- gratuities - except when the culture is such that paying a gratuity is seen as an integral part of the cost of receiving a service
- care costs - except to cover the costs of care for the dependents of existing members of staff where this is pre-authorised within the terms of a University approved initiative, for example as outlined within the Carer Support Guidance
- staff parties - except leaving parties for a member of staff who is retiring or leaving after highly valued service (to a maximum of £15 per head) and University staff parties open to ALL staff
- staff gifts/flowers - flowers and cards for members of staff in circumstances other than those recognised in the University's guidance regarding compassionate leave maintained by the Human Resources Division or a recognised University scheme eg long service awards
- subscriptions to professional bodies and academic/learned societies - except in circumstances detailed in Purchasing Guide 5
- charitable donations - except at an institutional level in limited prescribed circumstances and with prior authorisation by the Director of Finance
- alcohol - except in the specified instances below, and detailed in Purchasing Guide 5, where the modest provision of alcohol is considered an appropriate use of University funds:
  - visitor hospitality within the financial limits set for these activities
  - staff leaving events within the financial limits set for these activities
  - student welcome/leaving events within the financial limits set for these activities
  - other University events with a clear business purpose that are open to all staff if authorised in advance by the Director of Finance
  - where alcohol is served at a conference or event with a clear business purpose and is included within the attendance fee
  - for the above examples only when expressly permitted by the funder if the purchase is made from research income.

## **1.4 Fraud**

The University is funded predominantly from public sources or tuition fees paid by students and must ensure that all funds (whatever the source) are used appropriately and that justification for any expenditure can be clearly evidenced in the event of a request for information from students, funders, government or members of the public.

Any purchase that appears to be deliberately falsified, inflated or otherwise fraudulent will be investigated under the procedures outlined in the Counter-Fraud Policy and/or the disciplinary procedures for staff or students, depending on the particular circumstances.

## **2. Value for money (VFM)**

### **2.1 Basic principles of VFM**

The University aims to achieve VFM in all of its activities through maximising the economy, efficiency and effectiveness of the goods, services and works it purchases.

Achieving VFM requires judgements to be made, which balance the benefits derived from goods, services and works against the total cost of buying and using them. These total costs of ownership include the purchase cost, maintenance and running costs (including staff resource required) and any costs of disposal, as well as the cost of the buying process itself. Therefore, VFM is not always achieved by purchasing the 'cheapest' product or service.

### **2.2 Ensuring ongoing VFM through Contract Management**

As well as ensuring VFM is achieved at the point of purchase for any given goods, services or works, it is vital for ongoing requirements to ensure that the provision continues to deliver VFM throughout its duration.

Contract Management refers to a number of practices that exist to optimise the relationship between the University and the supplier, manage any risks and issues, and to ensure that both parties are able to perform their obligations under the agreement. It concerns all aspects of the contract's lifecycle, both pre-award (planning, formation, review, drafting, negotiation) and post-award (monitoring performance, renewal, exit, close-out). It is important that both parties should be in no doubt as to their respective obligations throughout the contract lifecycle, and that the contract remains a live document that is updated to reflect the most current status of the relationship.

Applying robust Contract Management ensures:

- a consistent approach to Contract Management across the organisation
- the responsibilities of the University and the supplier under a contract are clearly understood
- the potential for improved supplier performance and improved service delivery is realised
- the University receives the intended benefit of the contract
- the agreement remains current, competitive, and active (i.e. relevant and evolving as necessary)
- contracts are appropriately and proportionately supported by skilled Contract Managers
- availability of high-value management information that supports strategic decision-making and strong negotiations
- financial and reputational risk is reduced

- opportunities for dispute are minimised
- supply risks are avoided or managed effectively.

The amount of resource and activity dedicated to Contract Management activity should be proportionate to the contract that it supports.

### 3. Sustainable procurement

#### 3.1 Ensuring Sustainability in the Supply Chain

The University is committed to sustainable procurement. A number of sections of this policy and associated practice have specific Sustainability considerations included as an integral part of the process. These are identified throughout by this symbol:



Purchasing decisions have major socio-economic and environmental implications locally, nationally and globally, now and for generations to come. The University aims to ensure that its activities meet the diverse needs of students, staff, the economy and society. Procurement and Commercial Services are developing a comprehensive set of targets to support the University's overarching strategy.

Staff involved in the procurement of goods, services and works throughout the University must consider appropriate environmental, social and economic factors in their purchasing decisions.

Our sustainable procurement goals will ensure that:

- sustainability and social impact are incorporated into the whole procurement process; assessing and defining the need, evaluating options, design and specifying, supplier selection, tender evaluation, post-contract management and supplier development
- the University and our supply base complies with all relevant legislation and regulatory requirements
- the University promotes sustainable awareness and assessment amongst suppliers and contractors
- the University procures sustainable products and services wherever possible
- the University continues to reduce the negative environmental and sustainability impacts of construction and refurbishment projects
- the University develops measures to monitor our sustainable practice with a view to seeking continual improvement
- the University uses the results of the monitored practice to benchmark its performance against similar organisations, and analyses the benchmarked performance to identify areas of practice for improvement
- staff are upskilled to make sustainable procurement decisions, and have the tools to do so.

In particular, the University will affiliate to Electronics Watch, an organisation monitoring the rights of workers in the electronics industry supply chain.

Procurement and Commercial Services are currently represented on the University's Sustainability Committee and Environmental Forum.

Further information on the University's wider sustainability work can be found here: <https://www.sussex.ac.uk/about/sustainable-university/performance/sustainable-supply-chain/sustainable-procurement-framework>

## **4 Inclusion**

### **4.1 Reasonable adjustments**

The University recognises its obligations with regards to the Equality Act 2010 including, in the context of this policy, the requirement to make reasonable adjustments where necessary to meet the particular requirements of disabled members of staff. Adjustments may also be considered to support the needs of individuals with a relevant health condition or arising from pregnancy or maternity or other relevant circumstance where appropriate.

Areas of this policy which are recognised as potential areas for consideration are highlighted with the symbol below:



### **4.2 Exercising Judgement**

While every effort has been made to ensure that this policy supports these principles, it is recognised that it is not possible to consider the full spectrum of all individuals' specific circumstances or needs in this policy.

In all cases when asked to make an adjustment to standard policy provisions the budget holder should carefully consider the circumstances with the member of staff concerned and, where the request is agreed, record that the adjustment has been considered and agreed in the relevant field in the finance system. This information should be relevant and proportionate and should not contain confidential information.

The Finance Service Desk can advise on all general queries but cannot discuss individual needs or circumstances. Budget holders should refer to their line manager, HR business partner, Head of School or Director of Professional Service as appropriate if they require further support regarding the reasonableness of a particular adjustment.

## **5 Responsibilities**

### **5.1 Director of Finance**

The Director of Finance (or their delegate) is responsible for considering all exceptions to the terms of this Policy, and for approving these where there is a demonstrable business need. This should normally be in advance of the purchase being made wherever possible.

### **5.2 Procurement and Commercial Services**

Procurement and Commercial Services provide advice and support for all purchasing/ procurement activity. Their primary objective is to ensure that individual requirements can be met while ensuring that the University as a whole achieves maximum VFM through its procurement activity.

Procurement and Commercial Services must be engaged at the earliest planning stages for any requirement that may exceed £25,000 (including VAT).

### **5.3 Heads of School and Directors of Professional Services**

Heads of Schools and Directors of Professional Service are responsible for compliance with this Policy in their areas, and for ensuring that those acting under this Policy (for whom they have management or contractual responsibility) are appropriately trained and made aware of their obligations.

Directors of Professional Service maintain oversight of purchasing activity relating to their service area, regardless of the budget it relates to. In many cases, the professional service to which a purchase relates will need to provide authorisation prior to commitment to that purchase by the University.

Heads of School and Directors of Professional Service are responsible for ensuring goods, services and works are purchased within their defined budgets, and that this Policy is followed within their School or Division.

Heads of School and Directors of Professional Service are responsible for the oversight of contracts and their management within their areas of responsibility, unless other specific contract governance has been put in place.

Heads of School and Directors of Professional Service are responsible for the purchasing arrangements in a School or Division and will recommend the appropriate access to the finance system for staff who undertake purchasing, and the distribution and use of purchasing cards.

### **5.4 Budget approvers**

All Budget approvers are required under the University's Financial Regulations to comply with its policies and procedures regarding the authorisation of expenditure.

Budget approvers must ensure sufficient funds are available before committing the University to any expenditure for goods, services and works.

Budget approvers must ensure that purchases of goods, services and works meet the VFM criteria detailed previously.

Budget approvers are Heads of School, Directors of Professional Service and any other individual acting under delegated authority to authorise expenditure from a Head of School or Director of Professional Service.

### **5.5 Members of staff**

It is the responsibility of all staff to ensure that they follow the requirements of this Policy, the Financial Regulations and associated guidance when undertaking purchasing activity. Staff are responsible for ensuring that all purchases provide good VFM for the University.

Anyone claiming reimbursement for out of pocket expenses has a responsibility to make bona fide claims in accordance with this Policy.

## **5.6 Delegation**

The Financial Regulations make provision for the delegation of responsibilities, including purchasing by Heads of School and Directors of Professional Service.

Where these are delegated, the Executive, Head of School or Director of Professional Service retains overall responsibility for ensuring the requirements of this Policy are met and that VFM is achieved. This aims to put control and responsibility as near as possible to the point of need.

## **6.0 Principles of purchasing**

Purchasing should be conducted using a competitive process wherever possible, as this will drive up quality, drive down prices and introduce innovation into the products and services offered to the University.

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

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

The following limited exceptions to a competitive process are explained further in this policy:

- the University has already identified an appropriate source of supply of goods or services following a process intended to secure VFM
- the value of the purchase is small in relation to the cost of the buying process
- the expenditure is incurred while an individual is prevented from following the University's normal processes, for example while travelling away from the University. The value of these purchases should normally be small.

Applying this policy and associated processes ensures:

- all purchases are effective and appropriate to the University's diverse needs
- competitive bidding and tender processes are performed transparently and exceptions properly reviewed, authorised and justified
- suppliers are properly selected and authorised for use
- supplier relationships and contracts for the supply of goods, services and works are monitored and managed to ensure performance and VFM is maximised
- goods, services and works are correctly received and recorded as fit for purpose

- payments are only made for goods, services and works received in accordance with agreed standards and terms.

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

The first step in achieving VFM is to identify the right supply route for goods or services. In order to do this, the University has put in place a number of arrangements with suppliers, together with a framework for when they should be used.

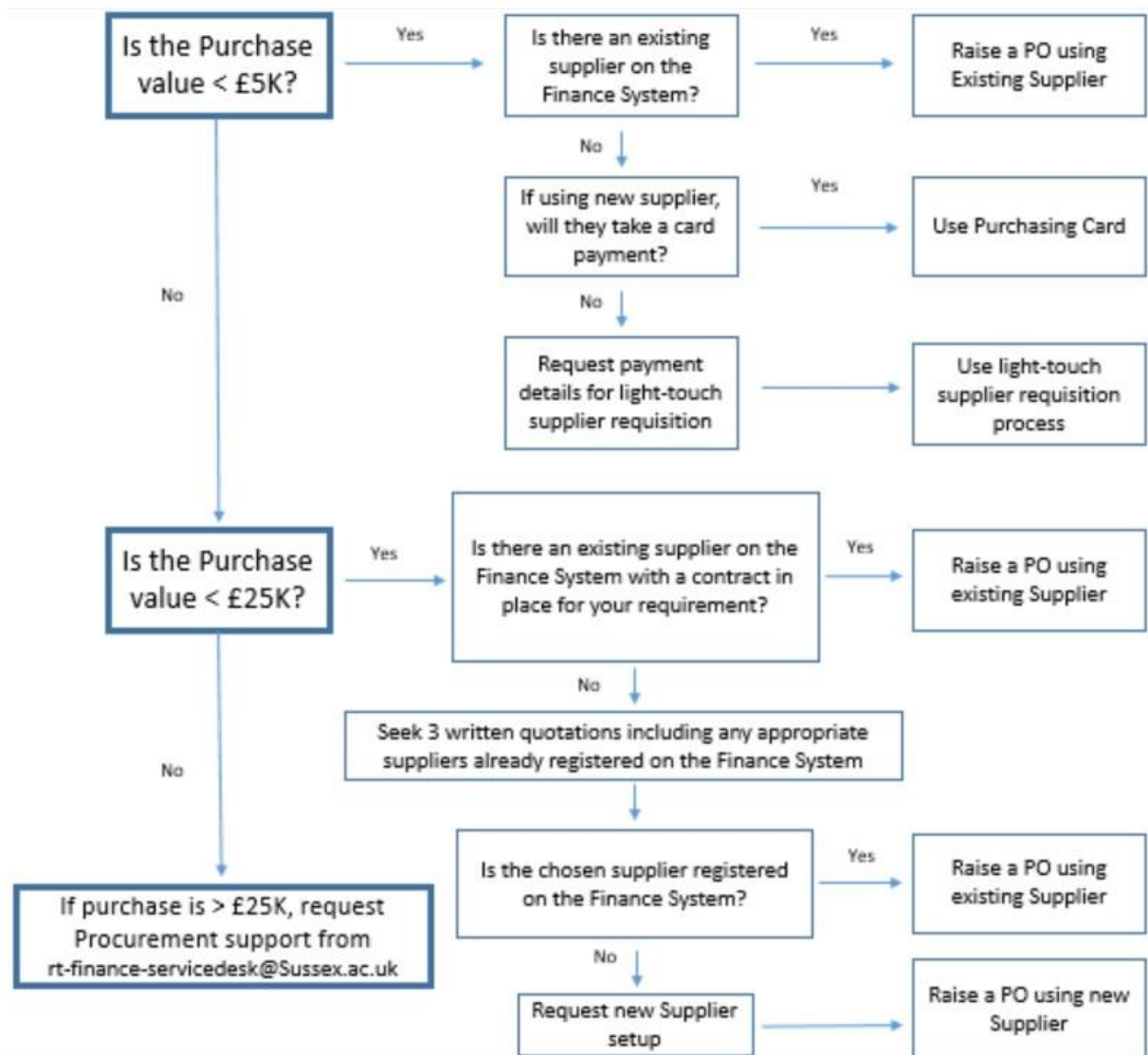
The framework for identifying the right supplier (set out in order below), and the requirements for competitive quotes outlined in Purchasing Guide 1, apply to all of the mechanisms of purchasing outlined in this Policy - including purchase orders, purchasing cards and, where appropriate, to out of pocket expenditure.

1. The University has a number of contracted suppliers who have been appointed following competitive tender on the basis that they will be the only supplier, or one of a limited number of suppliers of particular goods, services and works to the University. Contracted suppliers should be used wherever possible.
2. The University also has a number of approved suppliers, who are not contracted suppliers, but have passed the University's due diligence checks to ensure they are a suitable supplier of goods, services or works. Approved suppliers should be considered prior to engaging a new supplier if there is not a contracted supplier in place for your requirement.

The use of contracts negotiated by both the University and consortia will maximise purchasing power for the whole University, optimise VFM, support easier resolution of disputes and maintain legal compliance.

Purchasing Guide 1 - Finding the right supplier sets out in more detail how to identify and engage the right suppliers, as this can be affected by a number of factors (such as the value of the purchase). The table below summarises this process:





## 8 Mechanisms for purchasing goods, services and works

In order to support financial and budgetary control, contractual compliance and the delivery of VFM, the University's Financial Regulations require all purchasing to be carried out using a purchase order.

The only exceptions to this are defined by the Director of Finance (in order of preference) to meet business need and/or to support the achievement of VFM, as follows:

- university purchasing cards (section 6.4)
- out of pocket expenses reclaimed from the University (section 6.5)
- advances of University funds (section 6.6)
- purchasing subject to specific written dispensation of the Director of Finance (section 6.7)
- petty cash (section 6.8)

This Policy sets out the circumstances in which these mechanisms should be used and the key considerations to be taken into account in each case. Further details on processes to be followed, and requirements and guidance with regards to specific personal and travel and related expenditure, is set out in appendices to this Policy.

### **8.1 Supporting information**

To ensure that appropriate authorisation consideration can be given, relevant supporting information should be attached to any transaction within the finance system to demonstrate that the correct procurement process has been followed, that VFM has been achieved, the purchase is an appropriate use of funds and that it is being charged to the correct budget. This may include (but should not be limited to):

- Receipts/Proof of purchase
- written quotations
- tender waiver form (where appropriate)
- scoring summary of tender/quotation exercise
- contract summary page from agreed contract.
- status determination statement arising from Off Payroll Workers assessment under IR35 if the purchase relates to Off Payroll Working.

### **8.2 Information and guidance**

The efficiency and effectiveness of all purchasing mechanisms is reliant on the members of staff involved in the purchasing and authorisation process. Appropriate training and guidance is offered by the Finance Division to support this.

### **8.3 Purchase orders**

Purchase orders raised using the finance system are the principal mechanism for the purchase of goods, services and works in the University.

By sending a purchase order to a supplier, the University is effectively entering into a contract with that supplier based on the University's standard terms and conditions, unless other contract terms have been specifically agreed.

If a contract or terms other than the University's standard terms and conditions are to be used, these must have been approved and signed in line with the process detailed in Purchasing Guide 6, prior to the purchase order being raised.

The resulting contract should be clearly referenced in the purchase order description to make it clear that these are the terms that apply.

The University operates a 'No PO, No Pay' policy. This means that no invoice will be paid unless it can be matched against a valid purchase order, which has been goods received (to confirm that the order has been fulfilled). The only exception to this is where specific dispensation has been given by the Director of Finance in accordance with section 6.6 of this Policy.

It is therefore essential that no orders are placed with a supplier that will result in an invoice being submitted until there is an approved purchase order in place.

The purchase order is the primary way of confirming a requirement to the supplier and ensures that the University is protected by its own terms and conditions. It should contain all necessary information to ensure that the supplier can fulfil the requirement in terms of type, quantity, quality, location and price of the goods services or works being purchased.

It is essential for the supplier to receive full details of the purchase order to ensure that they can fully meet the University's requirements, and that subsequent invoices can be matched to and paid against them.

### **8.3.1 Financial and budgetary control and VFM considerations**

Adherence to the purchase order process enables the user to meet all of the University's financial control requirements and also supports them in delivering VFM as set out below.

With respect to financial and budgetary control, the use of purchase ordering ensures:

- up front Budget approver authorisation before a commitment is made
- segregation of duties and audit trail
- immediate and accurate recording of a commitment and the type of expenditure
- real time tracking of transaction status.

With respect to VFM, the use of purchase ordering ensures:

- suppliers engaged have successfully passed due diligence checks
- University terms and conditions are in place guaranteeing the most advantageous terms for the University and protecting it from potential liability
- shared and documented understanding of the goods or services being purchased
- a documented check over quality received before payment is made
- access to e-marketplace and frameworks, where VFM judgements can be made to purchase the most appropriate goods, services and works from an increasing number of suppliers.

### **8.4 University purchasing cards**

The University's policy is that a University purchasing card should be used when:

- a supplier is not set up on the University finance system and the purchase is below £5,000 (including VAT)
- a supplier only accepts card payments either on-line, by telephone or in person

- services are being purchased from the University's managed travel provider, in order to secure the price on offer
- the individual does not have access to the University finance system at the point when the purchase is needed
- facilitating travel and working away from base
- considering out of pocket expenses or a cash advance as an appropriate purchasing method

A Purchasing Card should never be used if the payment relates in any way to Off Payroll Working.

#### **8.4.1 Financial and budgetary control and VFM considerations**

Purchasing cards should be used in preference to out of pocket expenses where access to both alternatives exists. Whilst they are intended to provide a quick and easy access to purchasing it is important that, wherever possible, staff and Budget approvers take a planned approach to purchasing and do not use purchasing cards as a routine 'emergency' alternative to purchase ordering - or to engage suppliers where contracted or approved suppliers already exist that can meet the requirement.

Heads of School and Directors of Professional Service are responsible for the purchasing arrangements in their School or Division and should be aware that, whilst the use of a University purchasing card can offer certain VFM benefits to the University in comparison to purchase ordering, there are a number of financial and budgetary control considerations which must be kept in mind when determining the appropriate arrangements.

With respect to financial and budgetary control, the use of a University purchasing card offers reduced control in the following ways:

- the University has already been committed to the purchase before involvement of the Budget approver – their control is retrospective
- the recording of the transaction in the finance system is delayed until statements are processed and approved
- the risk of fraud or misuse is higher, placing additional requirements for vigilance on staff and Budget approvers.

The use of a University purchasing card can support good VFM in the following ways:

- cards enable simple and immediate purchasing with low maintenance cost and effort
- cards reduce the administration burden for one-off purchases
- cards offer some protection for the University against supplier issues and third party fraud (as for a personal credit card)
- where approved, cards enable cash withdrawal overseas - reducing the administration and security burden attached to advances of funds
- cards enable 'a better deal' for the University - for example, with card only suppliers or where prices are changing rapidly.

It should however be noted that when purchasing 'off system', supplier terms and conditions will apply in most situations and the member of staff concerned will usually be responsible for due diligence around the supplier, including the VFM they offer.

#### **8.4.2 Internal audit review**

Owing to the limitations and risks to financial and budgetary control and VFM outlined above, all use of purchasing cards may be subject to regular review by the University's Internal Auditors and reported onwards to the University's Audit and Risk Committee.

### **8.5 Out of pocket expenses**

It is the policy of the University that out of pocket expenses (which is the up-front purchasing of goods and services using an individual's own funds) should only be carried out where the individual:

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

Whilst out of pocket expenses is intended to provide a quick and easy access to purchasing when required, it is important that, wherever possible, staff and Budget approvers take a planned approach to purchasing and do not use out of pocket purchasing as a routine 'emergency' alternative to using a purchase order.

#### **8.5.1 Financial and budgetary control and VFM considerations**

The use of out of pocket purchasing limits financial and budgetary control and the ability to ensure VFM.

With respect to financial and budgetary control the use of out of pocket expenses offers reduced control in the following ways:

- the Budget approver's control is retrospective and dependent on the timing of the purchaser's claim for reimbursement
- financial records are not updated until a claim for reimbursement is made
- the risk of fraud or misuse and associated public scrutiny (for example through Freedom of Information requests) is high, placing additional requirements for vigilance on staff and Budget approvers
- the purchaser always takes responsibility for due diligence around the supplier including the VFM they offer.

In addition, the purchaser's personal funds are at risk until the claim is approved.

Evidence to support VFM judgements made should be retained for presentation to the authoriser. All claims must be submitted within 90 days of the expense being incurred or the staff member returning to their usual place of work following travel for business or research purposes (whichever is later).

Staff must ensure that they are never in a position to authorise claims that directly benefit themselves (e.g. approving their own expenses when a colleague may have raised the claim on their behalf). If unsure, staff should seek advice from the Finance Service Desk.

#### **8.5.2 Internal audit review**

Owing to the limitations and risks to financial and budgetary control and VFM outlined above, all use of out of pocket expense claims may be subject to regular review by the University's Internal Auditors and issues identified reported to the University's Audit and Risk Committee.

### **8.6 Advance of funds**

Any advance that relates to pay or salary is the responsibility of the Director of Human Resources and is outside of the scope of this policy.

In exceptional circumstances, it is the policy of the University that University funds may be advanced to staff, students and visiting researchers who are purchasing goods or services on behalf of the University and who:

- do not have access to the finance system or to a purchasing card in their own name or held by a member of staff with authority to purchase on their behalf
- are unable to make purchases or cash withdrawals using a personal credit card and receive reimbursement without incurring any additional personal costs.

Where a purchasing cardholder is required to hold an amount of cash, for example because they are travelling in an overseas location with a prevailing 'cash culture', this card should be authorised to withdraw cash and no alternative advance will be granted unless there are exceptional circumstances.

Any advance in any situation will always be limited to the anticipated expenditure and should not be regarded as a cash 'float'.

#### **8.6.1 Financial and budgetary control and VFM considerations**

The use of advances is the highest risk method of purchasing, and entails significant limitations to financial and budgetary control and VFM. They also entail significant additional administrative burden and security risks for any cash advanced. For this reason, the use of advances is strictly limited and controlled.

Failure to comply with University requirements set out by the Director of Finance will result in appropriate follow up action being taken to recover the value of the advance:

- staff: salary deduction
- students: a charge to the Student account
- others: a charge to a nominated budget.

#### **8.6.2 Internal audit review**

Owing to the limitations and risks to financial and budgetary control and VFM outlined above, all use of advances to fund purchases may be subject to regular review by the University's Internal Auditors and issues identified reported to the University's Audit and Risk Committee.

#### **8.7 Dispensation by the Director of Finance for certain supplies**

Where the Director of Finance has given specific written dispensation for purchases to be made outside of the mechanisms described above, this will be published on the Finance website.

Existing dispensations include purchasing from the on-campus catering supplier via the approved system.

#### **8.8 Specific arrangements for Staff Based Overseas**

Where staff are based overseas and do not have access to the University's finance system, purchasing should (wherever possible) be carried out using a purchasing card, which will be issued to them for this purpose. Staff should at all times aim to achieve VFM in purchasing in accordance with this policy and irrespective of the method of purchasing.

All out of pocket expenses must be reclaimed in accordance with this Policy, unless any more restrictive statutory or taxation provisions apply to these staff in the country in which they are based, which will take precedence.

### **9.0 Compliance**

#### **9.1 Legal context**

The primary legislation impacting University purchasing includes:

- [Public Contracts Regulations 2015](#)
- [Bribery Act 2010](#)
- [Modern Slavery Act 2015](#)
- [Equality Act 2010](#)

#### **9.2 Ethical obligations**

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

All members of staff involved in any way in the purchasing process must adhere to the University's rules on gifts and hospitality as set out in the University's Financial

Regulations and Anti-Bribery Policy.

### **9.2.2 Conflicts of interest**

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

Further details can be found in the Financial Regulations.

### **9.2.3 Modern Slavery Act 2015**

Under the Act, the University is committed to ensuring there are no instances of modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains, and that the following principles are adhered to:

- employment is freely chosen
- freedom of association and the right to collective bargaining are respected
- working conditions are safe and hygienic
- child labour shall not be used
- living wages are paid
- working hours are not excessive
- no discrimination is practiced
- regular employment is provided
- no harsh or inhumane treatment is allowed.

The University's modern slavery statement can be found at <https://www.sussex.ac.uk/about/strategy-and-funding/corporate-information>

## **9.3 Sanctions, embargoes and restrictions**

Under the Financial Regulations, unless authorised by the Director of Finance, transactions are not permitted with any individual or organisation that is the subject of sanctions, embargoes or restrictions imposed by the United Nations Security Council, European Union, UK Government or any other government or organisation with whom the University is required to comply by virtue of a contractual or regulatory obligation.

An individual or organisation may be the subject of sanctions, embargoes or restrictions by express inclusion on a published list or by association with another individual or organisation appearing on a published list. Individuals and organisations may be the subject of sanctions, embargoes or restrictions because they originate from, operate in or have association with a particular industry, regime, and country or otherwise defined geography appearing on a published list.

The inclusion of terms in a contract that bind the University to apply sanctions imposed by any other authority than the United Nations, European Union or the United Kingdom Government must be authorised by the Director of Finance in advance.

If there is any possibility that an existing or potential supplier may be subject to sanctions, or whether a contract term imposes an obligation to apply sanctions, Procurement and



Commercial Services must be contacted immediately.

Information on sanctions can be found on the Finance website.

<b>Review/Contacts/References</b>	
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Policy owner	Director of Finance
Lead contact/author:	Assistant Director of Finance (Procurement and Supply Chain)

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