

Request

Sent: 19 November 2023 20:35

UNDER THE FREEDOM OF INFORMATION ACT 2000 I [REDACTED] am requesting the following,

I WOULD LIKE TO SEE COPIES OF THE AGREEMENTS THAT YOU HAVE WITH THE DIFFERENT AGENCIES.

I WOULD LIKE TO SEE WHAT RESTRICTS WHICH COMPANIES THAT YOU CAN USE.

I WOULD LIKE TO SEE ANY RNN GROUP POLICIES THAT ARE IN PLACE THAT RESTRICT THE AGENCIES THAT YOU CAN USE.

I WOULD LIKE TO SEE ANY COLLEGE POLICIES THAT APPLY. (Could you also supply the link on the college web site that would take me to these policies)

I WOULD LIKE TO KNOW THE EXACT PROCESS THAT IS IN PLACE FOR AN AGENCY TO GET BECOME AN APPROVED SUPPLIER OF THE RNN GROUP.

I WOULD LIKE TO SEE THE AGREEMENTS THAT YOU HAVE REFERRED TO.

I WOULD LIKE TO KNOW WHAT "FINANCIAL REGULATIONS" YOU ARE REFERING TO. COULD YOU ALSO STATE THE PARTICULAR PARAGRAPH OF THE REGULATIONS, or a link to the paragraph of the "Financial Regulation" That you have referred to.

Our Ref: FOIA228

Your Ref: N/A

Date: 14th December 2023

Dear [REDACTED]

FREEDOM OF INFORMATION REQUEST (FOI): Agency Recruitment Process

Thank you for your request for information, which we received on 20th November 2023. We have handled your request under the Freedom of Information Act 2000 (FOIA).

Any correspondence regarding this should be addressed to FOI@rnngroup.ac.uk

Please note that we will be providing a response on behalf of the RNN Group as a whole, rather than any individual college or organisation within the Group.

The RNN Group main centres of operations are located at the following sites:

Site Name	Address
Rotherham College	Eastwood Lane, Rotherham. S65 1EG
North Nottinghamshire College	Carlton Road, Worksop. S81 7HP
Dinnington Campus	SITE NO LONGER IN OPERATION*
Dearne Valley College	Wath upon Dearne, Swinton. S63 7EW
University Centre Rotherham	Doncaster Gate, Rotherham. S65 1DJ
RNN Training	Carlton Road, Worksop. S81 7HP
Idle Valley Rural Centre	North Road, Retford. DN22 8SG
Construction Centre Rotherham	Rawmarsh Road, Rotherham. S60 1RU
Skills Centre Shireoaks	SITE NO LONGER IN OPERATION*
National Fluid Power Centre	Carlton Road, Worksop. S81 7HP
Create Skills Ltd	SUBSIDIARY COMPANY CEASED TRADING*
Charnwood Training	SUBSIDIARY COMPANY CEASED TRADING*
Aston Recruitment & Training	NO LONGER OWNED BY THE RNN GROUP*
Rotherham Education Services	Eastwood Lane, Rotherham. S65 1EG
Retford Post 16 Centre	Old Hall Drive, Retford. DN22 7EA
Nottinghamshire Children & Family Partnership	PARTNERSHIP HAS CEASED*

*Data from these sites have been re-located to other centres within the RNN Group, and if applicable, have formed part of the search for the information requested.



Below is the information you requested (*copied directly from the original request*):

UNDER THE FREEDOM OF INFORMATION ACT 2000 I (Mario Charalambous) am requesting the following,

I WOULD LIKE TO SEE COPIES OF THE AGREEMENTS THAT YOU HAVE WITH THE DIFFERENT AGENCIES.

Exempt under Section 43 (2) of the Freedom of Information Act 2000 – Commercial Interests.

I WOULD LIKE TO SEE WHAT RESTRICTS WHICH COMPANIES THAT YOU CAN USE.

Attached to the email is a copy of the Group's Procurement Policy – this is currently under review.

I WOULD LIKE TO SEE ANY RNN GROUP POLICIES THAT ARE IN PLACE THAT RESTRICT THE AGENCIES THAT YOU CAN USE.

As above.

I WOULD LIKE TO SEE ANY COLLEGE POLICIES THAT APPLY. (Could you also supply the link on the college web site that would take me to these policies)

Link to the Group's Financial Regulations below:

<https://www.rnngroup.co.uk/ig/financial-regulations-2023/>

Also attached to the email.

I WOULD LIKE TO KNOW THE EXACT PROCESS THAT IS IN PLACE FOR AN AGENCY TO GET BECOME AN APPROVED SUPPLIER OF THE RNN GROUP.

Please refer to the RNN Group's Procurement Policy.

The Group is currently undertaking a tender process for agency providers.

I WOULD LIKE TO SEE THE AGREEMENTS THAT YOU HAVE REFERRED TO.

Exempt under Section 43 (2) of the Freedom of Information Act 2000 – Commercial Interests.

I WOULD LIKE TO KNOW WHAT "FINANCIAL REGULATIONS" YOU ARE REFERRING TO. COULD YOU ALSO STATE THE PARTICULAR PARAGRAPH OF THE REGULATIONS, or a link to the paragraph of the "Financial Regulation" That you have referred to. **Please refer to the link above. See para 18.3 onwards on Financial Regulations**

Please note, whilst you have exercised your right to information under FOI, the RNN Group may not release some data it has on record. For example, if it contains personal details of individuals or if other exemptions apply, as detailed within the FOI legislation. See the Information Commissioners Office (ICO) website for further details as to what this means to you and the request you have made:

<https://ico.org.uk/for-organisations/guide-to-freedom-of-information/what-is-the-foi-act/>

In keeping with the spirit and effect of the FOIA, and in keeping with the RNN Group's transparency agenda, all information is assumed to be releasable to the public unless exempt. Therefore, the information released to you may now be published on the Group's website at www.rnngroup.co.uk/IG together with any related information that will provide a key to its wider context. Please note that this will not include your personal data.

Attached is Appendix A, giving contact details should you be unhappy with the service you have received from the RNN Group in regards to this FOI request.

If you have any queries about this letter then please do not hesitate to contact us.

Yours sincerely

The RNN Group Information Governance Team

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Appendix A

If you are unhappy with the service you have received in relation to your request, you may make a complaint or appeal against our decision under chapter 36, part 1, section 17 (7) of the Freedom of Information Act or under chapter 12, part 6, section 165 of the Data Protection Act (Article 57(1)(f) and (2) and 77 of the General Data Protection Regulations), within 40 working days of the date of this letter.

A copy of our complaints process can be found on the RNN Group website by following the link below and selecting the Feedback and Complaints section:

<https://www.rnngroup.co.uk/IG>

If you are not content with the outcome of the internal review of your complaint, the DPA gives you the right to apply directly to the Information Commissioner for a decision.

Please note that generally the Information Commissioner cannot make a decision unless you have first exhausted the RNN Group's own complaints procedure.

The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF



PROCUREMENT POLICY

2020

POLICY/ DOCUMENT PURPOSE STATEMENT

This document sets out the policy regarding the purchasing of goods and services including consultancy and professional services.

APPLICATION

All staff that procure supplies or services for the RNN Group should use this policy. Under this policy all goods and services should be acquired in a manner that reasonably ensures value for money in line with Financial Regulations. All purchasing should be based on good practice, where practical a co-ordinated system of purchasing should be used as a mechanism for obtaining value for money, whilst ensuring compliance with relevant procurement directives and legislation.

LEGAL REQUIREMENTS/ISSUES

Procurement of goods and services must comply with UK Procurement Contracts Regulations 2015 and tender thresholds.

DEFINITIONS

The Group means the merged Corporation of Rotherham College and North Nottinghamshire College established from 1st February 2016 and the subsequent merger with Dearne Valley College from 1st February 2017.

All references to **The Corporation** are to the members of the Corporation. This is the body to which the CEO/Principal reports and which is responsible to the Education Skills Funding Agency for discharging the functions of the Group.

The Corporation Board refers to a committee of the Corporation with delegated powers as outlined in its terms of reference, which can be found in the Group's Standing Orders.

The CEO/Principal is the Accounting Officer and is responsible and accountable under statute for the operational management of the Group.

The Executive Director of Finance refers to the person responsible for financial management and control within the Group.

Executive Leadership Team (ELT) refers to the CEO/Principal, Deputy CEO/Principal, Executive Director of Finance, Executive Director of HR & Marketing and Executive Director of Corporate Services.

Senior Leadership Team (SLT) refers to the body collectively responsible for the strategic and operational management of the Group including the Executive Leadership Team.

Budget Holders are members of staff responsible for income and/or expenditure within defined areas.

1. Introduction

- 1.1 Procurement should be co-ordinated, enabling the aggregation of requirements combined with a reduction of the number of suppliers used, including consideration of the use of call off contracts /orders as a means of reducing the administrative costs of raising and processing a large number of small value orders.
- 1.5 The Group aims for a decentralised but co-ordinated system of purchasing utilising purchasing consortia contracts (where possible), ensuring compliance with Procurement Contracts Regulations 2015 (PCR2015), and reducing commercial risk.

2. Strategic Objectives

- 2.1 Purchasing should be in accordance with the following objectives;
- to supply the Group with the right goods and services, at the right time, at the most advantageous cost.
 - to promote the delivery of value for money through good procurement practice, utilising the most cost efficient and effective methods for procuring goods and services throughout the organisation.
 - to facilitate the development of an effective and co-ordinated purchasing effort within the Group.
 - to identify opportunities for working with others, in order to increase the scope for maximising purchasing power and its attendant benefits.
 - to give due consideration to good governance, and to ensure transparency of arrangements.
 - to give consideration to sustainable, ethical, social and environmental objectives.
 - to comply with all relevant UK legislation.
 - to develop appropriate management information in order to measure the performance and value for money (VfM) achieved in purchasing by the Group.

Strategic Objective 1	To supply the Group with the right goods and services, at the right time, at the most advantageous cost.
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- Carry out an annual spend analysis to identify scope for better procurement. Report savings to the Corporation Board

- Optimise use of Government Procurement Cards (GPC) for low value transactions to reduce transaction volume and transaction costs
- Use electronic systems to render procurement processes more efficient

Strategic Objective 2	To promote the delivery of value for money through good procurement practice.
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- Embed the support of national and regional contracts where appropriate
- Identify opportunities to aggregate purchases at Group level to achieve VfM
- Standard approach to tendering controlled centrally using the eTendering portals Multiquote or the CPC Quote Tool.

Strategic Objective 3	To facilitate the development of an effective and co-ordinated purchasing effort within the Group.
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- Comprehensive annual analysis of Group spend patterns to inform procurement decisions
- Source supplies and services via consortium framework where appropriate
- Ensure that staff involved in purchasing receive appropriate training

Strategic Objective 4	To identify opportunities for working with others, in order to widen the scope for maximising purchasing power and identifying innovation.
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- Maintain membership of Association of Colleges (AoC) procurement network and build relationships with local colleges
- Maintain membership of Crescent Purchasing Consortium (CPC) and utilise the Frameworks available where appropriate.
- Network with other colleges by attending the regional Procurement Advisory Group (PAG) meetings.
- Network with other colleges / participate in collaborative arrangements

Strategic Objective 5	To give due consideration to good governance, and to ensure transparency of arrangements.
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- Identify key commodity spends for priority tendering and undertake tenders / mini-competitions to ensure VfM is achieved
- Ensure that Governors are informed of key procurement activity
- Maintain central database of all non pay contracts

Strategic Objectives 6 & 7	To embed sound ethical, social and environmental policies within the Group's procurement function and to comply with all relevant UK legislation in all aspects of Group purchasing.
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- Ensure that Group expenditure complies with UK Procurement Contracts Regulations 2015
- Ensure that environmental, social and ethical issues are fully considered when procuring goods/services

Strategic Objective 8	To develop appropriate management information in order to measure the performance and VfM achieved in purchasing by the Group.
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- Report on efficiency gains and savings against strategic objectives within annual report to the Corporation Board

3. Strategic Development

- 3.1 The Executive Director of Finance will be responsible for the implementation of the Procurement Strategy and will report annually to the Corporation Board.

4. Organisation

Procurement advice and guidance will be provided by Tenet Education Services, the consultant will be involved in procurement activity to ensure compliance of UK Directives and advise on best practice.

- 4.1 The Group will work with approved purchasing consortia in conjunction with the Finance Department who are responsible for monitoring procurement, including assisting with and monitoring contract negotiations where appropriate, assisting in tendering, maintaining supplier lists, and ensuring compliance with all relevant purchasing legislation.
- 4.2 Budget Holders will be responsible for ordering and authorising payment of purchases within their department (subject to Financial Regulations and Financial Administration Procedures). Purchasing authority may be delegated to named individuals within the department. Where authority is delegated the Budget Holder is responsible for ensuring all delegated staff are fully aware of financial regulations and procedures.
- 4.3 All staff involved in purchasing are expected to work in conjunction with the Finance Department and observe financial regulations and procedures related to purchasing at all times.
- 4.4 The Group requires all staff involved in purchasing, irrespective of the source of funding, to obtain supplies, equipment and services which are the most cost effective, whilst considering environmental aspects.

If an approved purchasing consortium is able to supply the required goods or service, departments must obtain the goods via the consortium contract where this contract represents best value for money.

When determining best value factors to be considered will include;

- Purchase cost (including firmness of price)
- Fit with sustainable development considerations
- Currency of payment
- Method of payment

- Length of warranty (or period of free maintenance) and annual maintenance charges thereafter
- Installation & running costs (or other ongoing costs inc. staffing implications)
- The cost of any required building or service alterations arising from the purchase
- Scrap or sale value
- End of life disposal costs
- Taxation
- IT Systems to have Data Protection by design

5. Best Value

- 5.1 The Group is fully committed to improving the economy, efficiency, and effectiveness of all its activities. All procurement of goods, works and services will be based on best value principles. Having due regard to priority, regularity and the Groups legal obligations.
- 5.2 The Group will consider all reasonable procurement options and any suitable hybrid/alternatives, to ensure best value is secured for all procurement of goods, works and services.
- 5.3 The Group promotes economy, efficiency, and effectiveness in its expenditure and it will seek to ensure that competition supports this. Goods, works and services will be purchased in a mixed economy of suppliers from the public, private, voluntary and community sectors, according to which supplier offers best value. The Group will give local suppliers every reasonable opportunity to bid for its business.

6. Diversity

- 6.1 The Group is committed to review services and policies to remove any discrimination and to ensure that the Group fulfils its duties in relation to diversity. Procurement practice will reflect this commitment by encouraging relationships with contractors and service providers who are equally committed to diversity.

7. Health and safety

- 7.1 The Group recognises and accepts its responsibility as an employer for providing a safe and healthy work place and working environment for all its employees and contractors.
- 7.2 Group staff need to be mindful of the health and safety issues to be considered when contracting in goods, works and services.

8. Authority to Purchase

- 8.1 Staff responsible for purchasing should be familiar with the relevant sections of Financial Regulations and Financial Administration Procedures.
- 8.2 The Corporation approves the budget for the financial year, thus allocating funds and delegating authority to make purchases from these funds to Budget Holders.
- 8.3 Authority to place orders can only be formally delegated to other named responsible staff by the Budget Holder. The number of people within a department authorised to place orders should be limited and must be agreed with the Director Finance and Funding.
- 8.4 Budget Holders (or their nominated representatives) are not authorised to commit the Group to any expenditure without ensuring that sufficient funds are available to meet the purchase cost of the goods or service. All purchases must conform to financial regulations and procedures at all times.
- 8.5 Materials and items in common use are usually obtained on the most advantageous terms if Group wide purchasing is employed. Where available, goods will be obtained via approved purchasing consortium; other supplies should be obtained from suppliers included on the Group Approved Supplier List.
- 8.6 IT supplies may not be obtained without the involvement of the Group IT Services Department to ensure compatibility with existing hardware and systems.
- 8.7 All purchase contracts or orders entered into on behalf of the Group will be authorised in accordance with Financial Regulations 7.3, which is detailed in paragraph 11.1 below.

9. Purchasing Procedures

- 9.1 The Finance Department will be responsible for ensuring a standardised Group wide approach to procurement.
- 9.2 All purchases will be subject to the Group's Official Terms and Conditions, unless other Terms and Conditions are agreed.
- 9.3 All purchases must be made via an approved official Group purchase order. The order must clearly indicate the nature of the goods or service, and if applicable refer to any agreed price, quotation or tender submitted.
- 9.4 Maintenance agreements should be co-ordinated by the department concerned to take advantage of a supplier's ability to undertake work on all equipment of a similar nature with a view to reducing overall costs.
- 9.5 Items may only normally be purchased from approved suppliers. Where an item is not available from an approved supplier the department concerned will liaise with the Finance Department to facilitate this purchase.

- 9.6 The ability of a supplier to meet the Group’s requirements should be assessed before any contract is awarded or order placed. The Finance Department, and where appropriate the purchasing consortium, will be responsible for examining a supplier’s conditions of sale to ensure they do not materially prejudice the Group.
- 9.7 Where another College department can provide a service internally, this must be used in preference to external suppliers. This includes repair and maintenance facilities.

10. Approved Suppliers

- 10.1 The Finance Department will maintain lists of approved contractors and suppliers.
- 10.2 All suppliers will be involved in an approval process prior to inclusion on the approved supplier list.
- 10.3 Approved suppliers and contractors will be subject to regular appraisal, and those companies whose performance has been unsatisfactory will be removed. The Finance Department will be responsible for carrying out ongoing supplier reviews.

Except in the case of specialist supplies where alternatives are not available (or in emergency situations for example storm damage or where there is an immediate Health and Safety risk) only approved suppliers may be used by departments for the supply of goods or services.

11. Quotations and Tenders

- 11.1 Requirements for quotes and tenders are specified in Financial Regulations. The aggregated value of the contract or purchase of goods and services over a 4 year period must be taken into account.

Financial Regulations paragraphs 7.2 to 7.7 (Authorisation of Orders and Contracts for Goods and Services) are reproduced below for completeness.

- 11.2 Goods and services purchased by the Group must be obtained expeditiously and economically. Budget Holders will ensure that purchases are made at the most favourable rate by obtaining tenders/quotations. If a tender/quotation other than the lowest is accepted, a written record will be kept of the reasons for the decision.
- 11.3 The requirements for obtaining tenders/quotations are as follows:

Value of Order	Requirements	Approval
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Up to £5,000	Assurance that best value has been achieved.	Budget Holder
£5,001 to £24,999	At least three hard copy quotations or use of consortia frameworks.	Budget Holder & Line Manager
£25,000 to £159,999	Tender process or use of consortia frameworks. All opportunities must be advertised through Contracts Finder.	Budget Holder & a Senior Postholder
£160,000 to £199,999	Tender process or use of consortia frameworks. UK PCR 2015 requirements must be complied with – see Financial Regulation 7.7. All opportunities must be advertised through Contracts Finder and Find a Tender service (FTS).	Budget Holder & a Senior Postholder
Over £200,000	Tender process or use of consortia frameworks. UK PCR 2015 requirements must be complied with – see Financial Regulation 7.7. All opportunities must be advertised through Contracts Finder and Find a Tender service (FTS).	Budget Holder, a Senior Postholder and Chair of Governors. A report to the Corporation is also required.

11.4 Where it is impossible or inappropriate because of the nature of the supply to obtain three quotations or tenders, a Senior Post Holder who is independent of the department wishing to place the order may authorise the placing of the order on the basis of a single quotation.

11.5 The tendering procedure is to be used to secure “approved annual suppliers” for supply of such items as computer equipment or maintenance/building works. This annual supplier is to be engaged for a period not in excess of one year. Where an individual building maintenance transaction exceeds £10,000 the process will revert to the standard procurement rules. *Purchase Requisitions relating to work of less than £10,000 requested under these arrangements are not subject to tendering procedures outlined in 11.3.*

11.6 Post tender negotiations will be undertaken in an attempt to secure additional savings.

11.7 Where the value of quotation or tender is likely to exceed £25,000 the

opportunity must be advertised through Contracts Finder to ensure compliance with UK Procurement Contracts Regulations 2015.

- 11.8 Where the value of a potential contract is in excess of UK procurement thresholds (see Financial Regulation Annex A or paragraph 15.1 below) consideration must be given to compliance with UK Procurement Contracts Regulations 2015. FE Sector Purchasing Organisation frameworks tenders may save the requirement to advertise throughout the Find a Tender service (FTS), provided they are PCR 2015 compliant.
- 11.9 Maintenance and lease agreements must also conform to Financial Regulations and Procedures, and tendering guidelines. When determining tender thresholds the total contract value ie reflecting duration of the agreement must be taken into account.
- 11.10 **It is not acceptable under any circumstances for purchases or contracts to be split into a number of lower value orders to avoid a quotation or tender threshold.**
- 11.11 Deviations from standard requirements contained in 11.3 and 11.5 will be reported to the Corporation Board.

12. Tendering Procedures

- 12.1 Tender procedures are specified within Group Financial Regulations (see above).
- 12.2 The Finance Department will ensure a consistent approach to tender documentation
- 12.3 The closing date must be strictly adhered to. Tenders received after the closing date will not be considered. The eTendering system Multiquote will lock all tenders received prior to the deadline, tenders will not be able to be viewed until the deadline has passed.
- 12.4 In line with Financial Regulations tenders will be opened by nominated individuals. A comprehensive audit log is stored within the eTendering system Multiquote which logs the user who opened the tenders and the date and time they were opened.
- 12.5 The decision to opt for a particular supplier must be taken after thorough evaluation of both the tender price, quality of service and cost effectiveness. If the lowest tender price is not accepted a written record of the reason will be recorded on the record of tenders form.

Post tender negotiations may be conducted to benefit the Group. The reason for any post tender negotiation must be detailed in writing and retained on file.

The Finance Department will assist departments in evaluating tenders, and will be fully involved in all post tender negotiations.

- 12.6 Successful tenderers will be informed in writing via the eTendering portal Multiquote and standard documentation will be used to inform unsuccessful tenders.
- 12.7 **Tender documentation will be retained for seven years after the completion of the contract.**

13. Sustainable Purchasing

- 13.1 The Group will consider environmental and social responsibility as a factor in all of its purchasing decisions.
- 13.2 Before buying any product or service the following questions should be asked:
- Is the product or service required?
 - Can the need be met in any other way?
 - Is a suitable product available elsewhere in the Group?
 - Can the requirement be met by renting, leasing or sharing rather than buying?
 - Is the specification right? Is it “fit for the purpose”, the appropriate quality (not over or under specified) and the correct quantity?
 - Can the product serve any useful purpose after its initial use?
- 13.3 Wherever possible the Group will give preference, where items are of a similar cost, to those that are:
- Manufactured with a high-recycled content.
 - Biodegradable or able to be recycled or reused.
 - Energy, water and resource efficient.
 - Packaged appropriately, not excessively using packaging that is recyclable or re-usable.
 - Non-polluting during production, working life and on disposal.
 - Durable, easily upgraded and repairable.
 - Not categorised as Special Wastes entailing additional disposal costs and procedures.
- 13.3 From suppliers who:
- are based locally;
 - are committed to environmental transparency and improvement;
 - do not exploit child labour or labour and economies in the developing world and adhere to Fair Trade Standards; and
 - supply environmental handling and disposal information.
- 13.4 The Group will strive to:
- Comply with all relevant environmental legislation.
 - Increase awareness of Sustainable Procurement across the Group.

- Encourage and persuade suppliers to operate environmentally friendly processes and supply environmentally friendly products.
- Educate its suppliers concerning the Group's sustainability objectives.
- Work with key suppliers to bring about changes and thereby spread sustainability improvements throughout the supply chain.
- Ensure that suppliers' environmental credentials are, as far as legally practicable, considered in the supplier appraisal process.
- Ensure that, where appropriate, environmental criteria are used in awarding contracts.
- Encourage internal purchasers to review their consumption of goods and materials, in order to reduce usage and adopt more environmentally friendly products, including the use of recycled products as appropriate.
- Specify, wherever possible and reasonably practicable, the use of environmentally friendly materials and products.
- Ensure that consideration is given to inclusion, within all specifications, of a facility for suppliers to submit offers for environmentally friendly alternatives.
- Ensure that appropriate consideration is given to the costs and benefits of environmentally friendly alternatives.
- Explore opportunities for recycling of materials as appropriate.
- Will monitor legislation impacts upon the Group in terms of disposal costs e.g. the disposal of fluorescent tubes, computers and monitors, disposal of cooking and other oils etc. Suppliers of these products will be required to quote for their disposal. Contracts may have to be reconsidered if suppliers are unable to meet this request.
- Address barriers to entry so that SMEs and local suppliers are encouraged to bid for appropriate work.

13.5 Further Environmental considerations, although not exhaustive, include:

- How raw materials are sourced (i.e. wood from sustainable forests).
- Will the supplier remove their packaging or are they obliged to remove it under the Producers Responsibilities and Packaging Waste Regulations.
- How suppliers consolidate deliveries, reducing environmental impacts ie fewer journeys, and reductions in transport costs.
- RNN Group has an obligation to ensure that appropriate steps are taken for the recovery and recycling of WEEE supplied by its business customers. Equipment provided that is covered by this legislation should be recoverable and recycled by the supplier at the end of its life, wherever possible.

14. Code of Ethics

14.1 Any personal or family interests which may impinge, or might reasonably be deemed by others to impinge, upon the impartiality, of any matter relevant to purchasing duties should be declared.

14.2 The confidentiality of information received in the course of duty should be respected and specific details of suppliers offers must not be divulged to

competitors. Information given in the course of duty should be true and fair and never designed to mislead, and must not be used for personal gain.

- 14.3 Whilst bearing in mind the advantages to the Group in maintaining a continuing relationship with a supplier, any arrangement, which might, in the long term, prevent the effective operation of fair competition, must be avoided.
- 14.4 Approval must be sought from the Executive Director of Finance or the Chief Executive for the use of official Group suppliers for personal purposes.
- 14.5 All Group staff involved in procurement must familiarise themselves with the Group's Anti-Bribery Policy and confirm their adherence to the policy.

Group suppliers will be advised of the Group's zero tolerance approach to bribery in line with the Anti-Bribery Policy.

Guidance on Group policy with regard to gifts and hospitality is contained in the detailed Anti-Bribery Policy.

Group staff should undertake training made available by the Group.

15. UK Procurement Contracts Regulations

- 15.1 In accordance with the UK Public Contracts Regulations 2015 (PCR 2015), the Group is required by law to advertise high value tenders in the Find a Tender service (FTS). The EU Threshold below apply until 31st December 2021. .

Threshold	Euros
Supplies £189,330	214,000
Services £189,330	214,000
Works £4,733,252	5,350,000

Thresholds are valid for two years, currently from 1st January 2020 until 31 December 2021.

(n.b. these amounts are exclusive of Value Added Tax (VAT).

- 15.2 The Executive Director Finance will be responsible for ensuring the Group complies fully with UK PCR 2015 requirements.