

# PROCUREMENT

**Scope:** This policy applies to all employees, contractors and volunteers of Catholic Education - Diocese of Rockhampton (CEDR)

## 1. POLICY STATEMENT

Catholic Education Diocese of Rockhampton (CEDR) is committed to the principles of Catholic social responsibility, maintaining school accreditation, and eligibility for government funding. CEDR's approach to procurement supports this commitment, through this Procurement policy, a supporting procedure, delegations' framework, and appropriate processes, systems and templates. This policy applies to all procurement activities undertaken by employees, contractors and volunteers engaged by CEDR.

## 2. DESCRIPTION

This policy describes CEDR's aims and principles for the procurement of goods and services including (but not limited to): information technology (IT); construction goods and services; rights; licences; intangibles; engaging contractors and consultants; venue hire; catering; travel; stationery; consumables, and cleaning. It establishes a framework that maximizes the benefits that can be delivered through sound procurement decision making and processes, recognising the need to achieve value for money, both in a budgetary sense and through advancing Catholic Social Responsibility, Good Governance and Sustainable resourcing practices.

The responsible use of CEDR resources means avoiding waste and extravagance by ensuring the purchasing of goods and services is undertaken with due care, for legitimate, work-related purposes and in accordance with law and this policy.

This policy will be implemented by employees, contractors and volunteers, applying the following principles to procurement:

- Catholic social responsibility: procurement activities are enlivened by the *Modern Slavery Action Plan*, *Reconciliation Action Plan*, and other relevant Catholic Social Teaching initiatives. CEDR is committed to upholding human rights, not only with respect to its own employees and users of our facilities, but also for workers within its supply chain. CEDR seeks to partner with suppliers who do not engage workers in forced or involuntary labour conditions. Suppliers of good and services to CEDR must not engage in child labour practices and we expect our suppliers to conduct themselves with integrity within their own business dealings.
- Good governance: procurement activities and outcomes meet probity, transparency, and accountability requirements. This includes compliance with law, CEDR policies, *Delegations Framework* and funding conditions. All procurement shall be undertaken in a manner that results in:
  - appropriate record keeping and documentation as set out in the *Procurement Procedure*
  - transparency of decisions made
  - adherence to the *Staff Code of Conduct*
  - identification and management of actual or potential (including perceived) conflicts of interest
  - avoidance of collusion in tendering, price-fixing, or other anti-competitive behaviours
  - management of risks through effective oversight and appropriate internal controls
  - confidentiality of all commercial information

- decision makers being accountable for their actions.
- Sustainable resourcing: procurement activities follow a structured procurement process in which employees formally demonstrate to the delegate (budget owner or contract approver) justification of the need to spend funds, with respect to all relevant ethical and financial considerations.

CEDR prioritises obtaining goods and services that meet specification, are delivered on time, at competitive prices, from screened suppliers for the best value for money based on total cost of ownership, and where possible using local suppliers to support local supply chains within our communities. Value for money evaluation should consider relevant financial and non-financial costs and benefits of each purchase including quality, risk, safety, suppliers relevant experience and performance history, ethical and environmental sustainability and whole of life costs.

CEDR seeks relationships with suppliers that demonstrate a commitment to these principles, through policies that align to or exceed CEDR's standards.

### 3. IMPLEMENTATION ISSUES

1. Procurement Procedure: This *Procurement* policy is enacted through implementation of the *Procurement Procedure*.
2. Gifts and benefits from suppliers: CEDR employees are required to behave with the highest integrity and ensure that their conduct is beyond reproach. No matter how small a gift or benefit is, accepting it may:
  - a. be perceived as a bribe or secret commission
  - b. cause a perception of undue influence
  - c. provoke a sense of obligation in the donor or the recipient
  - d. benefit some individuals or organisation through influence or unjust decisions, while unfairly disadvantaging others
  - e. result in the organisation incurring a Fringe Benefits Tax liability or any benefits obtained by CEDR employees
  - f. compromise the independence, impartiality or good name of CEDR.

Accepting gifts or benefits may create a conflict of interest between a CEDR person's official duty and personal interests. Where a gift or benefit is offered by a supplier or potential supplier and the gift or benefit is accepted, the CEDR person must declare the gifts of over \$150. Refer to the *Procurement Procedure* for further information. In conjunction with the above, CEDR employees are also required to ensure adherence to the *Staff Code of Conduct*.

3. Arm's length dealings: CEDR employees will always engage in transactions that are at arm's length with suppliers. Where a perceived or known conflict of interest exists, a *Conflict of Interest Declaration* should be completed and authorised by the delegated authority before entering into the transaction.
4. Delegations: CEDR employees will always seek purchasing approval for operating and capital expenditure in accordance with the *Delegations Framework*.

5. Preferred supplier arrangements: Where there is significant demand for particular goods and/or services, CEDR may consider establishing a documented supply arrangement with suitably qualified suppliers that is consistent with State Government purchasing arrangements.
6. CEDR employees must comply with all relevant legislation and regulatory requirements as applicable to their specific procurement activity.

#### 4. REFLECTION MATERIAL

##### CATHOLIC EDUCATION POLICIES AND DOCUMENTS

- [Code of Conduct](#) v4 2022
- *ICT Code of Practice - Staff* v7 2022
- [Conflict of Interest Declaration Procedure \(Code of Conduct\)](#) v2 2021
- *Procurement Procedure (currently titled School Purchasing Procedure)*
- [Risk Management Framework](#) v3 2021
- *Delegations Framework* v2 2023
- *Modern Slavery Action Plan*
- [Information, Communication and Technologies \(ICT\)](#) 2019/06
- [Maintenance of Catholic Schools and Services](#) 2018/07
- [Risk Management](#) 2020/08
- [Work Health and Safety](#) 2021/03
- *Reconciliation Action Plan 2021-2023*
- *Fraud and Corruption Prevention (draft policy)*
- [Sponsorship in Schools Guidelines](#) v1 2023

##### RESOURCES

- Diocesan Modern Slavery Statement
- Diocesan Delegations Policy
- Education Act 2013 (Cth)
- Education (Accreditation of Non-State Schools) Act 2017 (Qld)
- Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)
- Education Regulation 2013 (Cth)
- Modern Slavery Act 2018 (Cth)
- QCEC Not for Profit, Capital Assistance and Grant Funding guidelines

Supererogatory Fiduciary