

DRAFT

Purchasing Card Policy



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INTRODUCTION

This policy applies to all staff in possession of a City of London Purchasing Card (Pcard).

This policy should be read in conjunction with the Cardholder agreement (application form signed before receipt of your card) and the Cardholder User Guide¹. This policy must be signed by the Pcard holder in accordance with Financial Regulation 6.5.

Before signing the Pcard, the Cardholder must read and accept Lloyds Bank Plc's ("the Bank") terms and conditions of use (contained in the Cardholder agreement), and undertake to comply with any conditions of use which are notified to the Cardholder by the City in the Cardholder's terms of employment. The Bank's terms are non – negotiable, and in accordance with the terms, the Bank have the right to make changes to such terms at any time. These changes will be notified to you City Procurement.

The City of London Corporation ("The City") uses Pcards as part of its Procurement to Pay process and Low Value Spend Strategy. Pcards do not replace the current process of raising Purchase Orders (POs) for all categories of spend unless the item required is included on the list of items **exempt** from requiring a PO, but provide a method of payment where POs cannot meet specific strategic business needs, or, it is more cost effective to buy items via a Pcard.

Where appropriate, a Pcard should be used for all expenditure up to £1,000 per transaction. This will dramatically reduce the volume of invoices being processed by the City for spend below £1,000, improving invoice processing efficiency and helping to reduce the cost to the organisation for transactions up to £1,000.

Pcards must be used in accordance with The City's Procurement Code Standing Orders and Financial Regulations, and together with the Purchasing Card Policy must be followed by cardholders at all times.

This policy will enable you to make the best use of your Pcard, understand your obligations and restrictions, and will also advise you of what to do and who to contact if you experience any problems.

¹ Pcard User Guide is available on the Intranet.

POLICY STATEMENT

The Purchasing Card Policy has been developed for all Pcard users.

Pcards should be used in accordance with the City of London's Procurement Code, Financial Regulations, Employee Handbook, Staff Code of Conduct, Travel and Subsistence Policy and Business Travel Scheme.

When using your Pcard officers must ensure that:

- Whenever possible, expenditure is agreed prior to the purchase.
- Pcards are used for business purposes only and never for personal use.
- The value of the purchase is in line with agreed cardholder limits.
- Costs are kept to a minimum and transactions represent value for money.
- Cards are used by the individual named on the card.
- All transactions are coded to the correct cost centre and account code.

When entering an item onto the Lloyds purchasing card system, the cardholder is required to enter a description which is:

- Clear and accurate, avoiding the use of terms which may be open to misinterpretation.
- Provide enough information for an independent viewer to identify the item being purchased.
- Avoid the use of personal data.

Suspected misuse of the Pcard will be investigated and may be addressed in accordance with the City of London's Disciplinary Procedure and the Corporate Anti-Fraud & Corruption Strategy.

WHAT IS A PURCHASING CARD?

It is a corporate credit card that has been provided by Lloyds Banking Group, on behalf of City of London Corporation.

WHEN CAN IT BE USED?

- By the Cardholder to whom the card has been issued.
- To purchase goods and services relating to the business service only.
- Where a purchase order is not suitable.
- Low value, low volume purchases.
- One off or infrequent purchases.
- Examples of categories of spend appropriate for a Pcard include:
 - Learning and development
 - ²Travel and subsistence
 - ³Overnight Expenses
 - ⁴Overseas Travel
 - Petty cash expenditure
 - **Police only fuel** for hire cars where a fuel card is not available. Please contact Fleet Admin if a fuel card is required.
 - Subscriptions

In the first instance officers should endeavour to pay by purchase card for any subscriptions, as these are small amounts that are suited to the Pcard process.

If the supplier is not able to take payment by Purchase Card we should ask if they are set up to take payments via PayPal. If you have not signed up to this service you can do so by clicking on this link <https://www.paypal.com/uk/home>. This will link your purchase card to a PayPal account.

If neither of these is an option the subscription can be paid either on a full invoice i.e. the document says invoice on it and gives a date and invoice number or we can pay on a payment request form as a last resort.

We should not be using payment request forms unless a card payment cannot be made or they don't produce a valid invoice. We cannot pay on the subscription forms that some suppliers issue as this is not a valid document to pay against.

² Pcards may only be used for travel and subsistence in accordance with the Travel and Subsistence Policy included in the Employee Handbook on the intranet.

³ Overnight provision is included in the Travel and Subsistence Policy included in the Employee Handbook on the intranet.

⁴ Pcards may only be used for overseas travel and subsistence in accordance with the Business Travel Scheme included in the Employee Handbook on the intranet.

A list should be held centrally by each department to provide visibility of subscriptions and ensure that the list can be effectively maintained and managed avoiding the risk of duplication. Lists should be reviewed departments on an annual basis.

WHAT NOT TO DO WITH YOUR PURCHASING CARD

It must **NEVER** be used in the following instances:

- No personal use under any circumstances.
- Withdrawal of cash/cash advances unless you are a pre-approved user of this type⁵.
- Transfer money via Western Union or any other money transfer business.
- Fines, penalties, late fees incurred etc even if they were incurred during work.
- Utilities and Fuel are blocked by default on Pcards. All fuel purchases should be made using the corporate fuel card contract.
- Gift vouchers.
- Disaggregating the total value of a purchase by paying for part of a balance via the Pcard and some of the balance by another means, thus avoiding the procurement threshold rules.
- Off Contract spend i.e. where a corporate contract⁶ exists e.g. agency staff, advertising, IT hardware/software, stationery, cleaning and janitorial products, office furniture, printing services.
- The card and card number must not be used for illegal purposes.
- Suspected misuse of the Pcard be investigated and may be addressed in accordance with the City of London Corporation's Disciplinary procedure. Incidents of serious misuse (i.e. those listed above) may lead to action under the disciplinary procedure up to and including dismissal. Use of the purchasing card will be suspended during the course and pending the completion of any investigation.

Where any fraudulent misuse of the card is identified this may be investigated in line with the Corporate Anti-Fraud & Corruption Strategy.

ELIGIBILITY FOR A PURCHASING CARD

It is the Line Manager's discretion and based on business need to nominate staff for assignment of a Pcard.

All requests must be approved by the individuals line manager or designated department approver of Pcards.

⁵ A small number of staff have this facility for emergency procedures.

⁶ A list of current corporate contracts is available on the CoL website.

A cardholder must be a permanent member of staff who has worked for the City of London for a period of at least six months and must also have completed the probation period. Unless there are exceptional business needs, cards must not be allocated to consultants, temporary or agency staff.

Any new Purchasing cardholder must sign a declaration that they have read, understood and fully agree to comply with the purchasing card policy.

HOW MANY CARDS CAN BE HELD BY A BUSINESS UNIT?

A business unit can choose to have only one cardholder or multiple card holders dependant on genuine need and frequency of card use.

CARDHOLDER'S RESPONSIBILITIES

- Comply with all of Lloyds terms and conditions.
- Ensure the Purchasing card is used for business use only.
- Never allow any other employee to use the card or quote its number when ordering.
- Reconcile and submit for approval all transactions monthly in line with the Pcard User Guide⁷.
- Obtain value for money. Any quotations obtained should be attached to the expense report to demonstrate value for money has been sought.
- Retain all valid receipts to support each item of expenditure including VAT receipts⁸ where appropriate and upload onto the card management system each month for submission to your approver with the reconciled statement.
- Follow the User Guide that accompanies this policy on reporting the use of the Card.
- Be aware of the budget available and ensure that purchases made on the Card do not exceed the available budget.
- Ensure that all transactions are coded to the correct cost centre and account code.
- Ensure that the Pcard is used in accordance with The City's Procurement Code Standing Orders and Finance Regulations, and these together with the Purchasing Card Policy must be followed by cardholders at all times. Breach of these procedures may result in your card being suspended pending investigation and your authorisation to use a card may be removed.
- Report any changes in your circumstances that might affect your card use (such as name or job changes or long term absence) promptly to your Department Administrator.

⁷ Pcard User Guide is available on the intranet

⁸ Guidance on treatment of VAT on purchase card transactions is available on the intranet

- Keep your card and PIN secure, separate from each other, and report the loss or theft of your card or PIN to the Bank as soon as you are aware and to the Pcard Team as soon as possible after that.
- Inform your Department Administrator if you are leaving The City, and return your card⁹ to your Department administrator or line manager as soon as possible to avoid issues with reconciling your statement after you have left. Any subscriptions must be cancelled or transferred to a member of staff who requires the subscription.
- Undertake a full reconciliation of their transaction log, receipts and statement every month and submit these to their approver for further scrutiny and authorisation of statement payment. Cardholders should report any unrecognised transactions to the card administrator as soon as they are noticed. Likewise any suspected fraudulent transactions should be promptly notified to Head of Audit & Risk Management.

Transactions must not be split in order to avoid exceeding the single transaction limit.

Where card holders do not review their transactions every month or, fail to obtain valid receipts to support their purchases, this will be reported to senior management for investigation. Repeated or persistent failure to comply may result in your card being suspended or removed in accordance with the three strikes policy.

In exceptional circumstances a request to vary the single transaction or monthly transaction limit on a temporary or permanent basis, will be reviewed on a case by case basis, and will need to be authorised by your Line Manager, accompanied by a business case which includes Category Manager approval. This will then need to be submitted to the City Procurement Pcard team to be amended.

As a cardholder you may be audited by Internal Audit to ensure that you are complying with the Purchasing card guide and Policy.

APPROVER'S RESPONSIBILITIES

- Authorise the issue of a Purchasing card
- Ensure the Purchasing cardholder is using the Pcard appropriately at all times
- Ensure that the cardholder keeps up to date with transaction processing.
- Report any problems that the cardholder is experiencing to the Department Administrator.
- Report changes in the cardholder's circumstances that might affect their card use (such as name or job changes, long term sickness, and maternity leave) promptly to the Pcard Administrators.
- Approve the cardholder's transactions via the card management system once these have been reconciled by the cardholder. Where approvers do not approve their card holder's transactions every month, this will be reported to the approver's line manager. Repeated failure to approve transactions will be reported to your

⁹ In line with the Leavers Policy contained in the Employee Handbook available on the intranet.

Chief Officer and may result in your cardholder having their card removed which may affect your service delivery.

- Ensure that the cost centre and subjective codes are correct.
- Review all receipts to ensure compliance with the policy on items purchased before approving and that the receipts submitted are valid and match to the transactions on the submitted statement.
- Ensure VAT receipts are obtained and that VAT is correctly reconciled so that the City can claim back the VAT (gross amounts will be charged to cost centre where no VAT receipt is obtained). It is vital that VAT is set correctly as any fines incurred from HMRC due to incorrectly coded VAT on the cards will be charged back to the department cost centre.
- Ensure that leavers are reported to Pcard Co-ordinators and the Pcard is recovered and destroyed as soon as possible before the cardholder leaves the CoL.
- Report any suspected fraudulent transactions promptly to Head of Audit & Risk Management.

If you are unsure what the transaction is for or why the money has been spent then this should be clarified before approving. Remember: this is being charged to your budget and you are responsible for authorising any expenditure against your budget.

In the event of misuse of a Pcard, the approver is responsible for ensuring that appropriate and timely action is taken and that any loss associated with such misuse is recovered promptly. Approvers need to take all appropriate steps to ensure that Pcard transactions are for valid business reasons, and that failure to ensure appropriate checks are made may be investigated in accordance with the COL Disciplinary Procedure.

As an approver, you and your cardholder may be audited by Internal Audit to ensure that you are complying with the relevant corporate policies.

DEPARTMENTAL ADMINISTRATOR'S RESPONSIBILITIES

- Provide training, support and guidance to card holders and approvers.
- Check the application form has been completed correctly and authorised by the appropriate line manager.
- Undertake recovery action, including from Payroll, any identified personal transactions, and report these promptly to Internal Audit and HR.
- Inform City Procurement Pcard Co-ordinators when a card holder or approver has changed roles or departments, no longer requires their card or has left the organisation.
- Where the card holder has left the organisation, to retrieve the card and destroy it, and to notify City Procurement for the account to be closed following the last card reconciliation report.
- Where the card holder goes on long-term leave, to retrieve their card (if required) and store securely until the card holder returns. At the point of starting the leave

period, to notify City Procurement so that the card account can be suspended. The departmental administrator should arrange for any outstanding transactions to be cleared by the department on the cardholder's behalf.

- Manage the day to day administration of the Pcard within the business area. Pcard administrators are not permitted to hold a card.

REPORTING A LOST, STOLEN OR MISUSE OF A PURCHASING CARD

The City of London Corporation operates a “zero tolerance” approach towards fraud. Any deliberate misuse of a Pcard will result in disciplinary action in accordance with the City of London Corporation's Anti-Fraud Strategy and Staff Code of Conduct.

Cardholders and their authorising managers are responsible for reporting the loss, theft or misuse of a purchasing card, by calling Lloyds on **0870 513 4588** and **emailing the Pcard Administrators at chbpurchasecards@cityoflondon.gov.uk**, as soon as you are aware your card is missing or as soon as you become aware of unusual transactions on your account.

PCARD SECURITY

To reduce the risk of fraud, Cardholders should:

- Sign their new card immediately.
- Never lend the card or card number to anyone.
- Never send card details via e-mail.
- Never give out your PIN number to a third party when purchasing on the internet and only use secure sites.
- Ensure the Purchasing Card is kept in a secure location at all times. Leaving cards on your desk could pose a serious security risk for potential fraud or theft, and if lost or stolen due to negligence may result in disciplinary action.
- Always check the total on the sales voucher is correct before you sign or entering your PIN for transactions.
- If found after it is reported stolen, destroy the card and dispose of securely.
- Do not leave receipts with card number unattended.

CARDHOLDER ABSENCE

There may be instances when the deadline for all coding and paperwork falls during a period of short-term absence, for example, annual leave. If you know that there is going to be a deadline while you're away then you should update all transactions on the system and submit for approval. If the absence is likely to take

you well beyond the deadline then temporary arrangements should be made by advising the administrators.

APPROVER ABSENCE

If your approver is absent and your statement and transactions need to be authorised then you must identify a temporary approver – this can be someone in your team/department who has the financial delegation to sign off card transactions. Please make sure that you notify the Card Administrator if this happens.

CARD CANCELLATIONS

Cardholders who are no longer required to hold a Pcard, must inform the Pcard team and copy to their departmental administrator as soon as possible. Cardholders must cancel their cards if they:

- Are requested to do so;
- Leave the service of the City of London Corporation;
- Transfer to a different Department where use of the card is not authorised for that position.
- The Pcard Team will run regular reports on Pcard use for Line Managers. Any Pcards which remain unused for a continuous period of 6 months will automatically be reviewed with the Line Manager. If it is determined that the Pcard is no longer required by the Business Unit, it will be cancelled.

PURCHASING CARD THREE STRIKES P OLICY

It is important that if you have used your card within a particular accounting cycle you must ensure that all end of month procedures are completed prior to the deadline. All cardholders are reminded of the deadline by email around the 1st of each month. All transactions must be coded to the relevant cost centre and account code and approved by the 10th of each month following the transaction.

For each month that a cardholder fails to complete their coding and / or submit their expense reports by the appropriate deadline, the following will apply:

First Month of incomplete coding/submission of paperwork

- The cardholder will be notified, by email that they have failed to complete their coding and/or submit their paperwork and will be expected to rectify this as soon as possible.
- The Approver will also be notified.
- The card will be suspended until the coding/submission of paperwork is completed.

Second Month of incomplete coding/submission of paperwork

- The cardholder will be notified, by email that they have failed to complete their coding and/or submit their paperwork and will be expected to rectify this as soon as possible.
- The Approver will also be notified.
- The card will be suspended until the coding/submission of paperwork is completed.

Third Month of incomplete coding/submission of paperwork

- The card will be suspended and the cardholder and their Approver will be notified of this action. The Chief Officer will decide if the card is still required.

TRANSPARENCY

In accordance with the Local Government Transparency Code 2015, the City of London Corporation may publish P Card transactions on our website including transaction date, transaction reference, merchant category and the amount spent. Officers should refer to the Good Practice Guidelines for Purchasing Cards contained in Appendix 2.

FREEDOM OF INFORMATION

Under the Freedom of Information Act the public has the right to ask to see any information held by the City of London Corporation as a local authority, Police Authority or Port Health Authority.

DATA PROTECTION

In the course of applying for, and using, a purchase card, personal data about you will be processed by Lloyd's Bank PLC (the card provider). This includes:

- Your name, and who you are employed by (the City of London);
- Your work contact details (address, email address, telephone number);
- Your date of birth;
- Your staff/payroll number;
- Any proof of identification deemed necessary in order to process your application.

To obtain a purchase card, you must consent to your personal data being processed by Lloyds Bank PLC in accordance with the purchase card conditions of use (data Protection section) and the Lloyds Bank privacy statement (www.lloydsbank.com/privacy2.asp).

Such processing includes using your personal data to manage your application for a purchase card and providing the required purchase card services (eg access to online transaction systems). This may include checking your personal data against electoral registers, credit reference agencies and/or fraud prevention agencies

Unless you opt-out, Lloyds Bank PLC will share your personal data, both within and outside of the Lloyds Banking Group, for the purpose of direct marketing.

If, at any time, you wish to access your personal data processed by Lloyds Bank PLC, you may (subject to a £10 fee) submit a Subject Access Request to them under the Data Protection Act.

Should you have any queries or concerns with the processing of your personal data, you may wish to contact the City of London's Data Protection Officer by email at information.officer@cityoflondon.gov.uk, or on 020 7332 1209.

APPENDIX 1: CARD HOLDER LIMITS SCHEDULE

The following cardholder limits are set by default:

	Transaction Limit	Monthly Card Limit
Approved Departmental Officers	£1,000	£2,500

Monthly card limits can be varied in accordance with the following process:

Threshold for monthly card limit	Approval	Process
Up to £10,000	Line Manager approval	Line Manager to send approval confirmation to Departmental Administrator who will forward request to the Pcard team to increase the monthly card limit.
Over £10,000	Line Manager and Member of Finance Team with appropriate budgetary authorisation limit.	Line Manager and Member of Finance Team with appropriate budgetary authorisation limit to send confirmation to Departmental Administrator who will forward request to the Pcard team to increase the monthly card limit.

APPENDIX 2: BEST PRACTICE GUIDELINES FOR PURCHASING CARDS

The following guidance is an outline of good practice for the use of City of London Procurement Cards (Pcards). Expenditure needs to be clear on how it supports the strategic aims in the City's Corporate Plan namely:

- To support and promote The City as the world leader in international finance and business services.
- To provide modern, efficient and high quality local services and policing within the Square Mile for workers, residents and visitors with a view to delivering sustainable outcomes.
- To provide valued services to London and the nation.

Chief Officers

Chief Officers are responsible for ensuring that managers and officers in their departments apply the good practice principles in this guidance. They should utilise the reports provided by City Procurement to monitor the suitability of purchases, check that appropriate descriptions have been used and ensure that appropriate management approvals are being applied.

City Procurement will send Chief Officers a monthly report of all of their departmental transactions. This report will enable them to:

- Monitor the suitability of purchases
- Check that appropriate descriptions and rationales have been recorded for each transaction
- Ensure that appropriate management approval controls have been applied
- Take corrective action where necessary
- Report back actions taken in a form provided

City Procurement will provide Chief Officers with as much support as required, ensuring that good practice is consistently achieved, including management information, further guidance and training.

Line managers

Are responsible for approving Pcard transactions and for challenging officers to clarify the descriptions of their transactions where the suitability and rationale for the purchase isn't clear.

Suitability

Where possible expenditure should be agreed and approved prior to purchase. Care should be taken to exclude transactions deemed to be inappropriate such as alcohol or expenditure for informal staff social events. Care should also be taken in selecting venues, hotels and shops to ensure they represent value for money and there is a clear business case especially where luxury vendors are selected.

The types and values of purchases made with a Pcard must be within the limits agreed with the relevant budget holder or Line Manager at the time of issue or as subsequently amended.

Good Practice Guidelines:

- Wherever possible, expenditure should be agreed prior to the purchase. This should take account of the suitability of the transaction.
- In relation to staff social events, a distinction should be made between informal staff social events for which no official policy exists and the policies on long service or retirement events or awards set out in the Employee Handbook.
- In the case of the former, Pcards must not be used, in the case of the latter, Pcards can be used and if so, the descriptions and rationale provided on the Pcard system must make it clear that it is for a long service or retirement award in accordance with the City's policy.
- It is appropriate to use Pcards for business hospitality purposes including internal working lunches between officers and those between officers and external organisations, but only where prior managerial approval has been given and the nature and justification of the expenditure is provided in full with detail that shows how this meeting furthers our work e.g. "Working Lunch re Square Mile works maintenance 2 staff & 2 guests". Or 'Working breakfast with London open space partners, 1 staff & 3 guests.'
- Always think when officers seek approval for P Card expenditure whether they have followed the principles in this guidance.
- Bear in mind that in addition to the usual internal checks such as management reports and Chief Officer's reviews, some Pcard transactions may also be subject to external disclosure and scrutiny.
- Special care should be taken when selecting venues and hotels to make sure they are the best choice in terms of value for money, bearing in mind we are often compared to local authorities who are facing large-scale cuts in their services. There may be a good reason for breakfast at the Four Seasons New York, but please describe appropriately, e.g. 'Work breakfast with NY Mayor + 3 re: joint Air Quality programme.'

Descriptions

All descriptions of Pcard transactions must be clear and understandable and provide enough information for an independent viewer to identify the item (s) being purchased and the reasons for the transaction.

When entering an item onto the Pcard system the cardholder is required to enter a description, as shown below. This description must be an accurate account of the purchase.

Good Practice Guidance:

- All descriptions should be clear and understandable, avoiding the use of terms which may be open to misinterpretation. Please avoid the use of personal data (e.g. names of individuals).
- All descriptions should be given in full and provide sufficient information for an independent viewer to identify the transaction item. The description needs to be clear but concise.
- All descriptions should provide a clear reason for the purchase. For example, a description that reads “Return flight from London to Amsterdam” does not provide an associated reason, whereas “Return economy flight London to Amsterdam to speak at SME Conference” provides a clear rationale for the purchase and shows how it serves the wider public of London and the UK.

Approvals:

It is the responsibility of all Line Managers to assess the suitability of the transaction and that all information has been completed and recorded appropriately. Line Managers will receive an expense report (hard copy). All purchases should be carefully reviewed prior to sign-off and particular attention should be given to the description and rationale for the transaction. Where a description is not suitable, Line Managers should request that the cardholder re-enter the description and produce a new report for sign-off.

- Bear in mind that the shop or payee could also be problematic without proper explanation. ‘Jewellery’ from www.harrods.com is not a proper entry but ‘Repair for Mayoralty sword’ from www.astors.com might be.
- If no description is provided and this field is blank, Line Managers cannot sign off the expense report.
- Where unsuitable transactions or inadequate descriptions have been identified, feedback should be provided to staff members to support improvements in the future. Depending on the circumstances, senior management action may be required which could range from simply instructing the member of staff to take corrective action, formally addressing the issue via the Performance Development Framework, removal of the card from the officer concerned, or in the most serious instances initiating disciplinary measures in accordance with the City’s employment policies and procedures.
- Following Line Manager sign-off, Department Administrators will submit the approval on Pcard system. Department Administrators can act as a secondary checker of all information but not be the primary agent of raising concerns with purchase cardholders.
- Pcards should be used in accordance with the City of London’s wider expenditure policies provided in the Financial Regulations, Procurement Code, Employee

Handbook, City Buyer, Staff Code of Conduct, Travel and Subsistence Policy, and Business Travel Scheme.

I have read and understood the City of London's Purchasing Card Policy:

Signed: _____

Name [print]: _____

Date: _____