INTERNAL ONLY

ISLHD POLICY COVER SHEET



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EXECUTIVE SPONSOR or EXECUTIVE CLINICAL SPONSOR	Executive Director Finance
AUTHOR	Manager Procurement Policy & Performance
KEY TERMS	Purchasing Card (PCard)
FUNCTIONAL GROUP OR HUB	Strategic Improvement Programs, Finance
NSQHS STANDARD	Standard 1
SUMMARY	This Policy document outlines the application and use of PCards within ISLHD. This Policy highlights the responsibilities of employees who use PCards and the acquittal process of transactions using iExpense.



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1. POLICY STATEMENT

NSW Treasury instructed government agencies (TPP21-02) to use PCard to maximise savings and implement business improvement programs. PCard is a cost effective way to pay for low risk, low value goods and services. Authority to purchase goods and services is in accordance with the ISLHD Delegations Manual and approval processes established by local management. A range of controls have been implemented within ISLHD to manage PCard transactions and processes and reduce risk.

PCards will improve the efficiency of business processes by:

- Reduction of petty cash processes and transaction numbers,
- Reducing the need to raise purchase orders for low risk, low value goods and services,
- Avoiding delays in purchasing goods and services
- Expediting payments to vendors for goods and services purchased.

PCards are <u>only</u> to be used for business related expenses and in accordance with <u>Procurement Cards within NSW Health (PD2022_038)</u> and the <u>NSW Health Code of Conduct</u>. All purchases of goods and services must comply with NSW Government procurement policy, Ministry of Health policies, procedures and manuals, Treasurer's Directions and statutory requirements, especially as they apply to purchasing goods and services under Government contracts. All PCard expenditure must be supported by a valid tax invoice or receipt and identify any GST. All PCard transactions must be verified in iExpense.

PCard holders are responsible for the safe keeping and proper use of their cards and associated security information. PCard holders must <u>not</u> allow another person to use their card under any circumstances. If a PCard holder fails to complete the required financial processes or purchases items outside policy, the PCard holder may be directed to return the PCard for cancellation and face disciplinary or legal action

1.1 Summary of Acceptable Use

PCar	rd Do's		
/	Ensure any gift or reward that is received with a PCard purchase is recorded in the Gift Register and appropriately managed.	/	Make emergency purchases.
✓	Make purchases in response to a business need only.	>	Ensure purchase is within monthly and single transaction purchase limits.
~	Use a PCard only if your name appears on the PCard.	~	Substantiate purchases with appropriate documentation (ie tax invoices).
/	Receive approval and check with Cost Centre Manager that budget funds are available before purchasing.	/	Comply with acquitting and authorising process in accordance with this policy.
/	Purchase goods or services both domestically and internationally via phone, internet or email if secure.	/	Purchase newspapers for private patients only from small businesses and where monthly expense is less than \$1000.
~	Purchase Prepaid Debit Cards are: to be used as gifts (non-health staff only) and have been approved by Procurement & Supply Chain.*	~	Use merchants who have a padlock or solid key in the status bar at the bottom of the window on their web site.

^{*} Approved Prepaid Debit Cards will be entered into ISLHD Prepaid Debit Card register.

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PCar	d Do Not's		
X	Allow another person to use your card or share card details via email.	X	Split purchases to negate credit and purchase limits.
X	Accept a cash refund when returning goods because of damage etc. (EFTPOS refund only).	X	Purchase Clinical Products and Equipment (Please contact Procurement & Supply Chain).
X	Deposit money into the PCard account *Unless refunding a disputed transaction in accordance with Section 7.8 of this policy.	X	Claim a daily subsistence allowance when travelling.
X	Purchase gift cards to be subsequently used to purchase business related goods and services.	X	Purchase entertainment, unless you are a Level 1 or Level 2 ISLHD Executive.
X	Pay infringements and fines or Fleet motor vehicle expenses (excluding car-washing)	X	Purchase foreign currency or travellers cheques.
X	Pay for parking at ISLHD sites. Pool cars can use pool car parks.	X	Use against Special Purpose & Trust Funds
X	Purchase for ISLHD staff; cakes, morning teas and other gratuities in celebration or commemoration of an event, without correct approval and specific funding available.	X	Use to buy newspapers for private patients where a supplier account and monthly invoicing is preferable (monthly expense more than \$1000).
X	Purchase gifts / flowers for ISLHD Staff. ** Purchasing gifts / flowers for external parties as a gift may be permissible following manager approval as appreciation following an event.	X	Purchase from Australian supplier with no ABN.
X	Pay for patient catering that could be sourced from HealthShare.	X	Make any purchases whilst on leave.
X	Purchase airfares, alcohol, tips, or items for personal use		

2. BACKGROUND

This policy will advise PCard Holders and Authorising Officers of their responsibilities to ensure efficient and compliant use of PCards within ISLHD. This policy must be read in conjunction with Procurement Cards within NSW Health (PD2002 038)

Target Audience

PCard Holders, Authorisers, Financial Operations, Procurement and Supply Chain, Risk Manager and Internal Audit.

Definitions

Term	Definition	
PCard	Purchasing Card / Procurement Card	
PCard Holder	An ISLHD employee who has been issued with a PCard	
A Health Agency employee who is specifically appointed to Executive of the Health Agency to independently review a PCard transactions within the limits of authority delegated		



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ISLHD	Illawarra Shoalhaven Local Health District	
HS	HealthShare	
МоН	Ministry of Health	
CE	Chief Executive	
Acquitting Transactions	Is a certification process that confirms an incurred expense is correct. It is the process of coding the transaction in iExpense	
Authorising Transaction	Review by Authoriser who certifies the transaction as correct and permits the release of a payment	
iExpense	Oracle Expense Management System (EMS) module used to submit PCard transactions.	

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3. RESPONSIBILITIES

Stakeholder	Responsibility	
Ministry of Health (MoH)	Sets policy guidelines and framework for PCard usage.	
HealthShare (HS) PCard Support Team		
Chief Executive (CE)	Overall accountability for the use of PCards across ISLHD and has authority to set PCard limits and delegations for ISLHD.	
Executive Director Finance	Authority to approve ISLHD PCard applications and remove ISLHD PCards from PCard Holders.	
ISLHD Procurement and Supply Chain	ISLHD's internal monitoring and reporting on PCard expenditure, usage and compliance with ISLHD PCard Policy. Liaises with ISLHD Finance during investigations.	
ISLHD Financial Operations	The SPOC within ISLHD for the HS PCard Support Team. Provides finance advice, support and information to PCard Holders and Authorisers Coordinates the PCard Application process and investigates notifications and potential misuse received from the HS PCard Support Team. Liaises with ISLHD Procurement and Supply Chain during investigations	
Authorisers	Must ensure budget and procurement compliance by assessing purchases against the Conditions of Use (section 7.4 refers) and authorises or challenges each individual transaction as soon as possible.	
PCard Holders	Follow local management approval processes to purchase low risk, low value goods and services. Purchases must be in line with the Conditions of Use (section 4.3 refers). PCard Holders are to ensure purchases are coded with a tax invoice or receipt attached in iExpense as soon as possible.	
Australian Taxation Office (ATO)	Sets legislation requirements in relation to Goods and Services Tax (GST) compliance.	

4. POLICY

4.1 Eligibility Criteria

Employees who require a PCard in the performance of their duty may apply for a PCard. Employees who do not have financial delegation under <u>Section 5.5 of the Government Sector</u> Finance Act 2018 are still eligible for a PCard by approval in accordance with the PCard

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<u>Delegations and ISLHD Delegation of Authority Manual</u>. The eligibility criteria for access to a PCard has been set in <u>Procurement Cards within NSW Health (PD2022 038)</u>

A PCard may be issued to a permanent ISLHD employee who:

- Is responsible for purchasing low value goods and or services from suppliers on behalf of ISLHD, or
- Travels on behalf of ISLHD for business related purposes directly associated with their role.
 PCard should not be used for airfares or incidentals. Refer ISLHD Travel Policy

A PCard must **not** be issued to staff that are:

- Agency contractors,
- External consultants,
- Temporary contracted staff, or
- Volunteers.

4.2 Administration of PCards

Prior to the application process commencing, staff should seek approval from their manager.

Applying for a PCard:

- 1. Complete the PCard eLearning Module (including Assessment) on My Health Learning.
- Complete a <u>Procurement Card (PCard) Application and Amendment form</u> via SARA. Your application will be reviewed by your Direct Manager, ISLHD Financial Operations and Executive Director Finance before being sent to the HS PCard Support Team for action.
- 3. Apply for StaffLink iExpenses access via SARA.
- 4. You will receive instructions via email for next steps following approval of your application.

Decommissioning a PCard:

If a PCard Holder does not require a PCard any longer due to a change of position, resignation or 'under usage' they must perform the following tasks. **Note:** 'Under usage' is defined as no transactions in a six month period.

- Complete the cancelation application via the SARA Portal
- Destroy the card by cutting it into numerous pieces in front of a witness (department colleague)
- Ensure all current transactions are coded, certified and submitted for authorisation

4.3 Expenditure Limits

Each PCard Holder may only make purchases within their expenditure limit.

Purchases must not be split to circumvent the transaction or monthly limit specified in the Card Holder Agreement.

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Purchase Expense Per Transaction	Limit of Transactions Per Month
\$500	\$5,000
\$1,000	\$10,000
\$3,000	\$30,000
Custom level approved by the CE or EDF	Custom level approved by the CE or EDF

When completing the application via the SARA Portal the employee is to select the appropriate expenditure limit. ISLHD only allows up to the \$3,000 per transaction / \$30,000 per month, unless approved by the Chief Executive or Executive Director Finance.

Should a PCard Holder need to change their expenditure limit they must complete a PCard amendment form via the SARA Portal. The amendment form will then be sent to the Direct Manager for approval. Once approved by the Direct Manager, the amendment form will go to ISLHD Financial Operations for review prior to approval by the Executive Director Finance or CE

4.4 Conditions of Use

Compliance with the <u>Procurement Cards within NSW Health (PD2022 038)</u> policy directive when purchasing items is mandatory for all ISLHD PCard holders. PCard usage is aimed at improving the efficiency of the business processes associated with the purchase of low risk goods and services.

Conditions of use are outlined at Section 1: Summary of Acceptable Use

If PCard holders have any concerns please contact any of the following:

- Direct Manager
- Cost Centre Manager
- ISLHD Procurement and Supply Chain
- ISLHD Financial Operations transactional team

Caution: Suppliers may have a credit card surcharge fee. Wherever possible, PCard Holders should avoid paying a surcharge and advise the Supplier that the purchase is for a government agency. If there is no alternative and a fee is payable, this must be carefully considered when purchasing from a credible supplier and factored in to deciding best market value. The surcharge is clearly marked on the tax invoice and is to be coded specifically as an additional line in iExpense.

4.5 Internet Use

Internet purchases must only be made by approved PCard Holders on secure sites and after ensuring that the merchant is a reputable company/organisation with facilities to e-mail or post copies of tax invoices. This relates to both domestic and international internet purchases.

To ensure a site is secure, look for a padlock or solid key in the status bar at the bottom of the window on the merchant's web site. These symbols indicate a secure page where the information being sent is encrypted and cannot be read by other internet users. Secure sites also contain https:// rather than http:// in the address indicating an added encrypted transaction layer. The 's' after http means secure.

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Before making purchases, the PCard Holder must:

- Read the purchasing and return of goods policies of the merchant including delivery method costs which is normally available on the site.
- Not click on pop-up windows or go to different links on the site when making payments.
- · Verify the contact details of the Supplier.
- Not store credit card details on any online accounts.
- Insist that the Supplier provides email confirmation, which the cardholder will store for record keeping purposes.
- Retain the web address of the merchant along with the invoice when used.

4.6 Travel and Conferences – Refer to ISLHD Travel Guidelines

4.7 PCard Management and Maintenance

The PCard policy is established through the segregation of the roles of the PCard Holder and Authoriser outlined in Procurement Cards within NSW Health (PD2022_038). Purchases will be monitored to ensure compliance with Section 5.5 of the Government Sector Finance Act 2018 and whole of government procurement requirements and ISLHD delegations.

4.7.1 PCard Storage

PCards are to be kept secure by:

- Keeping the PCard in a secure location.
- Not keeping the PCard and Personal Identification Number (PIN) together.
- Ensuring the PIN is not shared.
- Signing the back of the PCard as soon as it is received.
- Not sharing the PCard or its details.
- Treating your card as if it were cash. Do not leave it unattended, such as in a car or workplace and do not give or lend your card to anyone.
- Ensuring when PCard details are disclosed the PCard holder receives a confirmed receipt of the correspondence from the Supplier.

A Card Validation Value (CVV) is a security code designed to improve cardholder verification and help protect PCard Holders against fraudulent transactions. This code is required for all purchases made over the internet. To ensure the CVV is kept secure, photocopies of the back of the card must **not** be shared under any circumstance.

4.7.2 Acquittal Process

Once a purchase has been made, the PCard Holder must code each purchase in iExpense. Coding must include particulars including the correct cost centre, account, entity and provide a full description of what the good or service is and the purpose. Transactions are to be coded as soon as possible after incurring the expense. Tax invoices must be scanned and attached to the transaction in iExpense. Once coded correctly, transactions are submitted for approval to the Authoriser.

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4.7.3 Approval Process

The approval process requires the Authoriser to ensure purchases have been made in accordance with the Conditions of Use. Authorisers are required to review the purchases made via PCard by viewing the coding and tax invoice/receipt in iExpense as soon as possible. Should the authoriser believe there is a discrepancy please review - Procurement Cards within NSW Health (PD2022 038)

4.7.4 Monitoring and Reporting

4.7.4.1 HS PCard Support Team

The HS PCard Support Team performs periodic reviews and provision of reports on card usage on behalf of ISLHD to ensure compliance is occurring in areas such as spend habits, coding, approval activity and frequency. They also run daily tests via Satori Continuous Control Monitoring to identify occurrences of potential misuse e.g. split transactions, duplicate transactions, and transactions with suspicious key words.

If potential misuse is identified by the HS PCard Support Team or Satori Continuous Control Monitoring, the HS PCard Support Team will notify ISLHD Financial Operations for review. The HS PCard Support Team will revoke PCards when instructed by the ISLHD Director of Finance.

4.7.4.2 ISLHD Procurement and Supply Chain

ISLHD Procurement and Supply Chain will monitor PCard transactions and complete a review at the end of each quarter. Reports will be sent to General Managers, business unit managers and staff detailing non-compliant behaviour and requesting response, with a view to sanctions and/or card removal where required. PCards that have not been used in the 6 months prior to any quarterly audit will be investigated.

Any instances where conditions of use or policies and procedures have been contravened will be reported to the Core Executive and Internal Audit. Procurement and Supply Chain will provide support to the ISLHD Financial Operations and Internal Audit during investigations as required.

4.7.4.3 ISLHD Financial Operations

ISLHD Financial Operations is the single point of contact (SPOC) for the HS PCard Support Team. They will keep a register of all PCard Holders across ISLHD. Any notifications received from HS in relation to PCards will be investigated by ISLHD Financial Operations and referred to the ISLHD Procurement and Supply Chain as appropriate.

4.7.4.4 Monitoring Gift Card Purchases

PCards are not to be used to purchase Gift Cards or Prepaid Debit Cards unless they are to be used genuinely as gifts for non-Health staff. The use of Gift Cards for business related expenses by ISLHD staff is unacceptable.

The correct process for purchasing prepaid debit cards to be used as gifts is:

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- 1. Request approval from Procurement & Supply Chain to purchase gift cards.
- 2. PSC will advise preferred suppliers and ensure the ISLHD Gift Card Register is updated with card numbers, values, purchaser and recipients.

Gift card use will be audited by Procurement and Supply Chain and Internal Audit.

4.8 Unauthorised/Disputed Transactions

All unauthorised or disputed transactions must be handled as outlined in the <u>Procurement Cards within NSW Health (PD2022_038)</u>. PCard Holders are to ensure there are no unauthorised purchases. If unauthorised purchases are identified, they are to be immediately reported to CitiBank who will investigate the disputed transaction(s). If the transaction is found to be fraudulent Citibank will cancel the PCard and re-issue a new one.

Should a transaction be made in error, repayment by the PCard Holder is mandated. Following consultation with their Direct Manager and ISLHD Financial Operations, the PCard Holder will mark the transaction as a dispute and refund the funds directly to the Card Account via BPAY.

The following business day, in iExpense they will match the deposit to the disputed transaction and attach a copy of the original Tax Invoice for the transaction and the BPAY Deposit Receipt to the refund transaction. This will allow for direct matching of the transactions.

NOTE: PCard Holders are to report and resolve disputed transactions immediately.

4.9 Non Compliance

PCards are to be used in accordance with:

- NSW Health Code of Conduct
- Procurement Cards within NSW Health (PD2022_038)
- PD2019 028 NSW Health Goods and Services Procurement Policy
- ISLHD Delegations Manual

Failure to submit transactions within iExpense by the PCard Holder in a timely manner will initiate the following:

- HS send an email to the PCard Holder after 15 days if transactions are not submitted for approval.
- If after 30 days no action has occurred an email will be sent to the PCard Holder and their Direct Manager. The Direct Manager must direct the PCard holder to complete the required actions in iExpense.
- If after 60 days no action has occurred an email reminder will again be sent to the PCard Holder advising that if after 90 days of no action the PCard will be suspended.
- After 90 days if no action has still occurred then the PCard will be suspended until the transactions have been acquitted or approved.

ISLHD bears the liability for all PCard transactions. There is a range of consequences applicable if purchases made with a PCard are not compliant with the PCard conditions of use. The outcome of a breach may result in the PCard being cancelled, and /or result in disciplinary or legal action for the employee in accordance with the NSW Health Managing Misconduct Policy Directive 2018 031.

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4.10 Tax Invoices & Goods and Services Tax ('GST')

A tax invoice is a document containing information about a taxable supply that must be provided by the Supplier to the purchaser. It is the Suppliers' responsibility to ensure they are charging the correct GST, if applicable.

When purchasing from an Australian Supplier the PCard Holder must:

- Obtain the original or endorsed fax/copy tax invoice as evidence of approval for each PCard transaction and to enable ISLHD to claim back any GST,
- Ensure all invoices are valid tax invoices.

PCard Holders are required to scan and upload tax invoices with every transaction within iExpense. If the tax invoice is not provided or is lost by the PCard Holder a Statutory Declaration Form must be completed and uploaded into iExpense. Assistance with GST coding can be provided by ISLHD Financial Operations.

5. DOCUMENTATION

Forms

The following forms can be accessed from the <u>HealthShare internet page</u>:

- PCard Application and Amendment Form
- PCard statutory declaration form

Policies and Procedures

- PD2015 049 NSW Health Code of Conduct
- PD2019 028 NSW Health Goods and Services Procurement Policy
- PD2022 038 Procurement Cards within NSW Health
- PD2018_031 NSW Health Managing Misconduct
- PD2016 010 NSW Health Official Travel
- ISLHD CORP DOC 04 ISLHD Official Travel Guidelines
- ISLHD Chart of Accounts

6. AUDIT

PCard use is monitored by Procurement and Supply Chain, ISLHD Financial Operations, and HSNSW PCard Support Team as per **Section 4.7.4** of this document.

Potential fraud or corrupt conduct will be reported to the Director Internal Audit. Findings of deliberate misuse must be reported to the Chief Executive

7. REFERENCES

- Treasury Policy TPP21-02 Use and Management of NSW Government Purchasing Cards
- HealthShare Procurement Card Webpage

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• <u>Audit Office of NSW - Use of Purchasing Cards and Electronic Payment Methods | Audit Office of New South Wales (nsw.gov.au)</u>

8. REVISION & APPROVAL HISTORY

Date	Revision No.	Author and Approval / Date
May 2015	1	PCard Steering Committee
2 October 2015	2	PCard Steering Committee
22 October 2015	3	Executive Director Finance
30 October 2015	4	Hyperlinks and policy updated to most current
March 2016	5	30 October 2015 - Issued for approval by Chief Executive
September 2018	6	Manager Financial Accounting. Revision and update to Policy as required by Policy review date.
January 2019	6	Executive Director Strategic Improvement Programs - Approved for Publication
August 2021	7	Review by Procurement Policy and Performance (Procurement and Supply Chain) and ISLHD Financial Operations. Incorporating agreed actions of Internal Audit PCard Review 2020.
April 2022	8	Author: Manager Policy & Performance (Procurement and Supply Chain)
		Approval/Date: Corporate Policy Recommendation committee / March 2022
		Approval/Date: Executive Director Infrastructure Development / April 2022
February 2023	9	Author: Manager Policy & Performance (Procurement and Supply Chain)
		Minor Change Approval/Date: Director Corporate Governance & Risk / February 2023
June 2023	10	Author: Manager Policy & Performance (Procurement and Supply Chain)
		Minor Change Approval/Date: Director Corporate Governance & Risk / June 2023

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