

Purchasing Card Policy

This policy describes the process for using purchasing cards, recording spend on purchasing cards, and the extent and limit of internet purchasing within the Trust.

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Policy on a Page

Summary and Aim

This policy sets out the framework within which Trust-owned purchasing cards can be used. It does not address the procedures related to requesting, issuing, managing or monitoring purchasing cards. This is addressed in a separate Purchasing Card Procedure Manual and is described in the flowchart attached as Appendix 4 to this policy.

It also defines the parameters within which internet purchasing is permitted by the card holder and can be used as a route of supply for goods and services. There are clear parameters by which card holders are not permitted to purchase via the internet and this policy.

Target Audience

All purchasing card holders.

Training

Training is delivered individually as new cards are issued to holders

Definitions that Apply to this Policy

Purchasing Card: a Trust bank card issued in the name of the card-holder, used as a specific procurement route for a defined range of goods and services.

Due Regard: Having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people. Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

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1. Introduction and Purpose

It has been identified within LPT that, in certain circumstances and for certain situations, purchasing cards may be used within defined limits of use to procure goods and services, particularly where ad-hoc patient shopping is required, and some procurement is required from internet-based suppliers for specific reasons or internet-based procurement is the only route available.

2. Purpose / Why we Need this Policy

2.1 The purpose of the policy is to define the circumstances in which purchasing cards can be used, and define the controls required to ensure safe use of this route for procuring goods and services.

2.2 The framework of guidance and legislation surrounding the use of purchasing cards are contained within the Trust's Standing Orders and Standing Financial Instructions, relevant linked Trust Policies, particularly those relating to the use of specified or a range of specified goods or services for reasons linked to standardisation, Health and Safety, or other approved agreements.

2.3 The overarching legislation governing the use of purchasing cards is the Consumer Credit Act 2006

2.4 The overarching internal governance for the use of purchasing cards is the Trust's Standing Orders and Standing Financial Instructions. Specific relevant policies include:

- LPT Counter Fraud Policy
- LPT Code of Conduct Policy
- LPT Procurement Strategy

3. Use of the Purchasing Card

3.1 The use of the purchasing card is simply another means of expenditure from budgets. Therefore, the same governance compliance applies when using purchasing cards as for any other purchases or expenditure from budgets Trust Standing Orders and Standing Financial Instructions, and compliance with budget holder approval procedures. You must not use a purchasing card to bypass the Expenditure Control Form (ECF) process.

3.2 Procurement via purchasing cards must adhere to the Trust's Social Value responsibilities and modern slavery statement.

3.3 Spend on commodities using a purchasing card contributes to the overall spend for that commodity across the Trust, across all means of procurement.

3.4 Each purchasing card has unique spending limits that will be advised at the time the card is issued. Different limits apply to different card holders. Each card holder has a limit per order / transaction inclusive of VAT, and each card has a

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monthly credit limit. This is printed on the monthly statements. Splitting purchases in an attempt to avoid these limits is not permitted.

3.5 The purchasing card must not be used to:

- Avoid compliance with any policy or guidance relating to procurement
- Bypass a process to obtain goods quickly
- Avoid raising an order
- Avoid using contracts or recognised sources of supply eg, NHS Supply Chain (NHSSC)
- Obtain cash, except in exceptional circumstances and must be approved by the Chief Finance Officer.
- Purchase any clinical items

The Trust has the duty to obtain value for money for all purchases therefore, use of the card should be limited to those transactions where it is not possible or more efficient to go through the traditional procurement route.

Should a card holder conduct any of the above actions, the card will be removed and deactivated.

3.6 Whilst the purchasing card is printed with individuals' names, the account and therefore the liability remains the responsibility of the Trust. Consequently, there is no impact on the card holder's personal credit status. However, inappropriate use by the card holder may result in disciplinary action, including termination of employment. Where there is a suspicion or evidence of fraud a referral will be made to the Local Counter Fraud Service in line with the Trust's Fraud, Bribery and Corruption Policy, which may result in the application of a criminal sanction.

3.7 Where applicable, the card can be used in person, by telephone, or via the internet. When processing any requests remotely, care should be taken that the vendor is legitimate and the possibility for purchasing card details being "cloned" is limited

3.8 Use of the purchasing card does not create a contract between the buyer and seller. It is a means to make a payment. The contract to purchase is formed when the order is entered onto the vendor's site and is accepted by the vendor.

3.9 The purchasing card cannot be used for certain types / categories of spend:

- Any clinical goods
- Items which can be ordered via NHS Supply Chain
- Items which can be ordered via the iProc E-Catalogue
- Items from tendered or contracted sources, unless specifically permitted under the contract arrangements
- Items requiring Trust protocol or branding requirements
- Items requiring the validation of quality, functional or performance standards

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- Any mechanical, electrical or battery-operated equipment which may come into contact with staff or patients
- Medical devices
- Any IT equipment
- Train / aeroplane tickets
- Hotel bookings
- Medicines and pharmaceutical items
- Anything on Amazon, eBay or any other “Market Place” (please contact the procurement team should you require items from these sites)

4. Duties within the Organisation

4.1 The Trust Board has a legal responsibility for Trust policies and for ensuring that they are carried out effectively.

4.2 Trust Board sub-committees have the responsibility for adopting policies and protocols.

4.3 Directors and heads of service are responsible for ensuring the correct use of purchasing cards issued to their staff.

4.4 Managers and team leaders are responsible for ensuring the correct use of purchasing cards issued to their staff.

4.5 Responsibility of Staff: Requisitioner

The person requesting the goods or services. This is the person who requisitions the items, not orders them. This person will receive the goods / services. The requisitioner is never the card holder, or the authoriser of the expenditure.

Cardholder

The person issued with the purchasing card. This person is given authority to commit expenditure by the budget holder. This is the person who will order the goods and services from the supplier. The purchasing card has been issued to the member of staff, and therefore the member of staff is responsible for the proper use of the card, in accordance with the relevant guidance and regulation.

The cardholder must:

- Be responsible for the proper use and security of their purchasing card;
- Purchase only appropriate goods and services using the purchasing card, retaining such evidence of the purchase as is necessary – e.g. telephone conversation notes; receipts; printed acknowledgements;
- Not attempt to process transactions that exceed their transaction limits, or are outside their permitted area of spend;

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- Create a Digital Transaction Log that records details of original request, approval for expenditure (from budget holder), record of all communication with vendor, stores receipts and retains a copy of the monthly statement;
- Record all approval to purchase decisions, and transactions on the digital transaction log for review and proof of activity, whether made in person, by telephone or via the Internet;
- Ensure that goods are received and checked and reconciled with the digital transaction log;
- Check the monthly statement match the details on the transaction log;
- Notify the card administrator immediately if they notice any unauthorised transactions;
- Detail the appropriate financial codes against each transaction on the statement;
- Resolve any charging errors with the supplier and obtain an agreed credit for inclusion in the next monthly statement;
- Approve the statement, via email by coding, attaching evidence of receipts, invoices etc and forwarding to the budget holder for authorisation. The budget holder (approver) must be on the authorised signatory list for the Trust;
- Retain invoices, delivery notes and other documentation for all transactions for at least 6 years;
- Contact the supplier for any returns and to resolve simple disputes;
- In the event of the loss or theft of the card, take the appropriate action as detailed in the guidance (Purchasing Card Manual);
- Inform the card administrator at once of any change in the card holder's circumstances, job and/or department;
- Return approved statements and receipts every month to the card administrator. Failure to do this by the deadline of every month will result in your card being deactivated. If this happens more than 3 times, your card will be removed and cancelled.

Authorising Manager

The person authorised to approve the monthly purchasing card log for payment.

The Authorising Manager must:

- Be an authorised signatory for the Trust;
- Check through the statement and be satisfied that the purchases are valid and appropriate;
- Check that the coding is correct;
- Authorise the statement;
- Identify and take appropriate action on any inappropriate purchases (as per this policy) and report such instances and the action taken to their budget holder, manager, and the card administrator;
- Ensure that the emailed statement is forwarded to lpt.lptpurchasingcard@nhs.net with your approval to meet the monthly

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deadline. This is to allow expenditure audits to be carried out on a timely basis. Failure to do this will result in the card being deactivated. If this happens more than 3 times, the card will be removed.

Budget Holder

The person who controls the budget. It is this person who gives the card holder the authority to commit expenditure on his/her behalf. This person may also be the authorising manager, or may give this authority to someone else, but not the cardholder or requisitioner.

The Budget Holder must:

- Be an authorised signatory for the Trust;
- Approve appropriate requests for goods / services to be obtained using the purchasing card;
- Establish that use of the purchasing card is the only or the best value way to procure the item, and that all relevant budgetary and procurement governance is being followed.

4.6 Training is mandatory for all staff involved in the use of purchasing cards, or authorisation of the expenditure incurred, and is provided at the point of card issue by the Support Buyers based in the Procurement Team.

4.7 Adherence to this policy is mandatory to retaining your purchasing card.

5. Purchasing Card Safeguards

5.1 Whether using the card directly to shop for goods and services, or using the internet as an interface to procure, there needs to be safeguards in place to protect both the card holder and the organisation; and to ensure that the goods being purchased are safe to use on NHS premises and fit for purpose.

5.2 The card is a Trust card but is registered to the individual card holder who has signed an LPT Card Holder Agreement. Each card is issued to a single named card holder and has pre-agreed limits on the value of single transactions and monthly expenditure, and categories of spend.

5.3 There is a division of responsibilities in the process of purchasing using the purchasing card, which reflects that of all procurement within the Trust. Items are requested by a member of staff, approved by the budget holder, and purchased by a different member of staff who is a card holder, and the card expenditure is approved for payment by the card holder's manager.

5.4 The supplier is paid by the bank within 4 working days of the transaction, and the Trust receives monthly statements from the card provider, detailing the transactions for each card holder, which enable Finance to record the

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transactions and allocate costs accordingly, without the need for invoices. The Trust makes one payment per month to the bank to cover all card transactions.

- 5.5** Cards are not transferable to another Trust or public authority.
- 5.6** The card cannot be used to obtain cash, except in exceptional circumstances and must be approved by the Chief Finance Officer.
- 5.7** The card cannot be used to set up direct debit arrangements, but can be used for subscription charges (for example, cloud storage, apps, etc).
- 5.8** The card holder may only use the card for business purposes. Goods can only be delivered to Trust premises. The effective working of the purchasing card system depends on the integrity of each card holder. Breaches of Trust policy with regard to the use of purchasing cards may be referred to the Local Counter Fraud Specialist (LCFS) for investigation, which could result in the application of a criminal sanction on individuals.
- 5.9** All purchasing policies apply to purchases made with the purchasing card. These include, but are not limited to, compliance with Trust Standing Orders and Standing Financial Instructions; compliance with budget holder approval procedures; and compliance with all relevant standards including electrical safety requirements; fire standards; FSC standards for items made from wood; and country of origin (compliance with UK law on labour standards).
- 5.10** Audits will be routinely conducted for both purchasing card activity and retention of receipts and invoices. The expenditure on each card will be reviewed and audited. Special attention will be paid to verifying that expenditure is appropriate to Trust business. This is in addition to any routine audits undertaken by the Trust's audit team.

6. Card Security

- 6.1** The purchasing card must only be used by the designated purchasing card holder.
- 6.2** It is the card holder's responsibility to ensure that the card is retained in a secure location (locked away for access by the cardholder only) at all times. The card must be available for audit inspection at all times.
- 6.3** The card can only be used in accordance with the financial limits applicable to each issued card.
- 6.4** The purchasing card holder must not, under any circumstances, disclose their individual purchasing card number (PIN) to anyone.

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- 6.5** The purchasing card number must not be sent to anyone by email. Information that travels over the internet as regular electronic mail is not fully protected from being read by outside parties. All reputable merchant sites use encryption methods that protect private data from being read by others as online transactions are made.
- 6.6** The purchasing card is for Trust purchases only; cardholders must not provide purchasing card details to a web site for any other purpose (eg, surveys or other instances where a purchase is not being made).
- 6.7** Cardholders must never allow the card number to be held or saved in a vendor's database.
- 6.8** Transactions should be reviewed and reconciled routinely, so that any fraud is identified as early as possible. There have been instances where a vendor's database of stored credit card numbers has been accessed through the Internet. Should you identify any fraudulent activity, please escalate as soon as possible to the card administrator / Procurement Team and LCFS.

7. Internet Purchasing

- 7.1** It is recognised that in certain circumstances, the only route for purchasing an item is via the internet. This includes any form of on-line buying, whether it is directly from the supplier or through a third-party supplier. Please note that purchasing via Amazon, eBay or any other "Market Place" is not permitted for many reasons – ethical, financial, legal, etc. If you require any items via these websites, you must contact the Procurement Team.
- 7.2** Card holders should only use secure sites and reputable well-known suppliers for ordering goods and services on the internet. If a card holder has any doubts about the security of a website then they should not use it.
- 7.3** Payment via third parties (payment gates), such as 'PayPal' are not permitted.
- 7.4** Accounts should only be set up in the name of the Trust / department. The cardholder's private account must not be used to purchase items on behalf of the Trust.
- 7.5** You must use UK based suppliers, unless there really is no other option, in which case, please contact the Procurement Team

8 Training

- 8.1** Training is provided to the card holder at the point of card issue by the Procurement Team and must be refreshed annually via e-learning. If you do not refresh your training, your card will be deactivated.

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9. Monitoring Compliance and Effectiveness

- 9.1 The effectiveness of this policy will be maintained and reviewed jointly by the Director of Finance and Performance, the Group Head of Procurement and the Financial Controller.
- 9.2 The prime means of auditing the use of the purchasing card is via the statements and receipts that you must submit on a monthly basis. The detail stored on the digital storage log will be audited on an ad-hoc basis via the audit team. A report is provided to the Group Head of Procurement on a monthly basis. The report details cards not used, any amendments made to cards, spend and prohibited spend. Action is taken on any cardholders as a consequence.
- 9.3 Where any inappropriate purchases are identified by the Authorising Manager, appropriate action must be taken by the Authorising Manager, and also reported to their budget holder/ manager, and the card administrator.
- 9.4 Cards will be withdrawn if:
- There are persistent delays in the reconciliation process
 - A cardholder uses the card inappropriately. Disciplinary action may be taken against the card holder

If the card is used inappropriately by a group of staff / department (eg colleagues using a card and having access to the card and PIN), disciplinary action may be taken against all staff involved.

10. Fraud, Bribery and Corruption Consideration

The Trust has a zero-tolerance approach to fraud, bribery and corruption in all areas of our work and it is important that this is reflected through all policies and procedures to mitigate these risks.

Fraud relates to a dishonest representation, failure to disclose information or abuse of position in order to make a gain or cause a loss. Bribery involves the giving or receiving of gifts or money in return for improper performance. Corruption relates to dishonest or fraudulent conduct by those in power.

Any procedure incurring costs or fees or involving the procurement or provision of goods or service, may be susceptible to fraud, bribery, or corruption so provision should be made within the policy to safeguard against these.

If there is a potential that the policy being written, amended or updated controls a procedure for which there is a potential of fraud, bribery, or corruption to occur you should contact the Trusts Local Counter Fraud Specialist (LCFS) for assistance.

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Appendix 1: Governance

Version control and summary of changes

Version number	Date	Description of key change
2	15.11.2017	New checklist requirements.
3	14.11.2019	Policy Renewal. Includes various changes including stringent controls around internet purchasing and the banning of sites like Amazon and eBay. This is due to maverick buying behaviour around the Trust and purchasing of items for clinical use via these sites. Any purchases required via these sites need to be done via the Procurement Team.
4	13.12.2022	Policy Renewal. amendments to update various elements. Introduction of reporting process and actions undertaken as a result of uncompliant behaviour.
5.	12.03.2026	Policy Renewal. Minimal amendments to update various elements. More clarity around control of use when vendor not present and update from manual to digital record keeping.

Responsibilities

Responsibility	Title
Executive Lead	Chief Finance Officer
Policy Author	Group Head of procurement Financial Controller Assistant Finance Manager Purchasing Card Administrator
Advisors	360 Assurance Directorate Heads of Finance Director of Governance and Risk Chief Finance Officer Buying Team Leader Deputy Assistant Director IT Infrastructure
Policy Expert Group	

Governance

Governance Level	Name
Level 1 Assurance Oversight	Finance and Performance Committee

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Level 2 Delivery Group for policy approval and compliance monitoring	
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Compliance Measures

KPI (only need 1-2 KPI's per policy)	Where will this be reported and how often
All purchases made in line with this policy	Annual review at Audit Committee

References and Associated Documentation

This policy was drafted with reference to the following:

- Ministry of Justice, Government Procurement Card (GPC) Policy (March 2013, updated February 2015)
- LPT Code of Conduct-Policy (December 2024)
- LPT Counter Fraud, Bribery and Corruption Policy (December 2025)

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