

CORPORATE PREPAID CARD POLICY

Policy number	CORP/008/V1.0
Version	1
Approved by	Policy Sub Group
Document author	Deputy Director of Finance – Corporate Accounting
Executive lead	Chief Finance Officer
Date of approval	18 October 2021
Next due for review	October 2023

Version control sheet

Version	Date	Author	Comment
1	September 2021	Deputy Director of Finance – Corporate Accounting	Consolidation and re-write of predecessor CCGs policies

Equality Statement

Equality, diversity and human rights are central to the work of the Hampshire, Southampton and Isle of Wight (HIS) CCG. This means ensuring local people have access to timely and high quality care that is provided in an environment which is free from unlawful discrimination. It also means that the CCG will tackle health inequalities and ensure there are no barriers to health and wellbeing.

To deliver this work CCG staff are encouraged to understand equality, diversity and human rights issues so they feel able to challenge prejudice and ensure equality is incorporated into their own work areas. CCG staff also have a right to work in an environment which is free from unlawful discrimination and a range of policies are in place to protect them from discrimination.

The CCGs' equality, diversity and human rights work is underpinned by the following:

- NHS Constitution 2015.
- Equality Act 2010 and the requirements of the Public Sector Equality Duty of the Equality Act 2010.
- Human Rights Act 1998.
- Health and Social Care Act 2012 duties placed on CCGs to reduce health inequalities, promote patient involvement and involve and consult the public.

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1. Introduction

- 1.1 Hampshire, Southampton and Isle of Wight CCG has identified advantages to be gained by using prepaid cards as part of its procurement and purchase process.
- 1.2 The prepaid card can be used when buying goods and services from any supplier who operates a prepaid card facility.
- 1.3 The prepaid card provider is Prepaid Financial Services.

2. Purpose

- 2.1 The purpose of this policy is to provide a clear understanding of the CCG's principles regarding the rules and guidance to be followed for use of the CCGs prepaid cards. This is to ensure sound governance is in place in respect of expenditure incurred on behalf of the CCG.
- 2.2 The CCGs prepaid cards can only be used for buying goods and services required to ultimately deliver the CCG's objectives and vision.
- 2.3 It is envisaged these cards will only be used where it is not possible to use any other form of payment method/procurement. Examples include train tickets, hotel bookings etc.

3. Scope

- 3.1 All CCG staff must be aware of this policy, before they wish to use the prepaid card.
- 3.2. It should be noted that this Policy does not cover the use of Personal Health Budget cards, for these purposes please refer to the Personal Health Budgets Policy.

4. Definitions

- 4.1 A prepaid card is in effect 'cash'. It is not a "credit" or "purchasing card". It is replenished with funds via the internet, once the funds have been spent it cannot be used again until additional funds are added.
- 4.2 A cardholder is someone who has a prepaid card issued to them for use by the CCG.

5. Roles and responsibilities

- 5.1 The Accountable Officer has ultimate accountability for the strategic and operational management of the organisation, including ensuring all policies are adhered to.
- 5.2 The CCG Governing Body is responsible for ratifying all policies in use by the organisation.
- 5.3 The cardholder is responsible for all transactions made on the card and should ensure that the card does not go into a negative balance.
- 5.4 All transactions must be authorised by an authorised budget holder prior to committing the CCG to expenditure. The Chief Finance Officer and the Finance Department have overall responsibility to ensure full compliance of the policy.
- 5.5 The cardholder may only use the card for business purposes, mainly high cost travel expenses, small items of office equipment and training that cannot be paid by other means. The effective working of the prepaid card system depends on the integrity of each cardholder.
- 5.6 Breaches of CCG policy regarding the use of prepaid cards may be referred to the Local Counter Fraud Service (LCFS) for investigation in line with the CCG Fraud, Bribery and Corruption Policy, which could result in the application of criminal action contrary to the Fraud Act 2006 and/or the Bribery Act 2010 and the Theft Act 1968.

6. Process / procedure

Issue

- 6.1 A complete list of the CCGs employees that hold corporate prepaid cards is held by the Deputy Director of Finance (Corporate Accounting).
- 6.2 Authorisation for issuing new or replacement corporate prepaid cards may only be given by the Chief Finance Officer. New cards will only be issued if supported by a case of need based on value for money and operational necessity after taking into account all alternatives such as purchasing through Solent Supplies.
- 6.3 The CCGs Cardholder Procedure must be followed in all cases.
- 6.4 Each card will be issued by the finance department's prepaid card administrator (Business Partner Corporate & Financial Reporting). As the card is issued, each cardholder will be required to sign an Employee Agreement (see [Appendix 1](#)).

Amended Cards

- 6.5 If there is a need to amend the name on a prepaid card, the card holder should contact the prepaid card administrator to facilitate this amendment. Obsolete cards should be cut in half across the magnetic strip and confirmation this has been done emailed to the prepaid card administrator following receipt of the new card.

Security

- 6.6 The prepaid card must only be used by the designated card holder. The designated card holder must not, under any circumstances, disclose their individual card number or PIN to anyone. It is the card holder's responsibility to ensure that the card is retained in a secure location at all times. Details of this safe place must be shared with the appropriate Finance Manager.
- 6.7 The card must be available for audit inspection at all times. The spending log/statements may be audited by senior finance personal, Internal Audit and/or the Local Counter Fraud Specialist at any time without prior notice.

Lost / Stolen Cards

- 6.8 If the card is lost or stolen, the holder must contact the card administrator immediately.

Job Change / Leaving Employment

- 6.9 In the event of a job change, the Chief Finance Officer will decide if the card is required for continued use. This decision will be communicated to the card administrator in writing.
- 6.10 Upon leaving employment of the CCG, the card must be returned to the card administrator who will arrange for it to be cancelled and destroyed

Card Holders Liability / Credit Status

- 6.11 Whilst the card is printed with an individual's name, the funds are held in the name of Hampshire, Southampton and Isle of Wight CCG and consequently there is no impact on the individual cardholder's personal credit status.
- 6.12 Personal purchases should not be charged to the card. If any transactions have been found to breach the NHS organisation's terms and conditions (e.g. spending outside agreed limits), the card will be immediately suspended until the matter is resolved. The cardholder will be held to account for any breach in the CCG's terms and conditions and evidence of inappropriate purchases may result in a referral to the LCFS for further investigation and may result in disciplinary action, including termination of employment.

Limits

- 6.13 Each card has a financial limit and can only be used when there are sufficient available funds on it to meet the transaction. If a transaction is in excess of available funds the transaction will be declined.

- 6.14 The card administrator will arrange for funds to be replenished when the available balance is below an agreed level, as set by the Chief Finance Officer (see [Appendix 1](#)). The card administrator will review the available funds periodically as appropriate depending on the value and volume of transactions being made on an individual card. The CCG may ask for the card to be topped up before the lower limit is reached, if we are aware of a specific need arising.
- 6.15 The card holder is responsible for informing the card administrator if a high value transaction is anticipated. The card administrator will review the available funds and if appropriate seek approval to top up funds as required.

Transactions

- 6.16 The purchasing card can be used at most suppliers; however the card cannot be used to obtain cash as this facility has been blocked.
- 6.17 The CCG 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 efficient to go through the traditional supplies route.
- 6.18 Prepaid cards should only be used for items which are required urgently or where the supplier is not able to provide an invoice in advance of payment. The card should never be used to circumvent the CCG's procurement procedures.
- 6.19 The cardholder may only use the card for business purposes, mainly high-cost travel expenses, small office related items, and training that cannot be paid by other means. Purchases other than for these types of expenditure should be exceptional and agreed in advance with the Deputy Director of Finance (Corporate Accounting). Prior sign-off in writing from the Chief Executive Officer, Chief of Staff or Chief Finance Officer is required if the prepaid card is to be used for purchasing gifts for individuals on behalf of the organisation or for purchasing goods and supplies in relation to holding a celebration event (e.g. a leaving or retirement gathering for an individual) on behalf of the organisation.
- 6.20 Breaches of CCG policy with regard to the use of prepaid cards may be referred to the LCFS for investigation which could result in the application of a criminal sanction.
- 6.21 It is normally expected that staff pay for low value travel tickets in advance and claim the costs back via expenses. However, the card may be used for high value travel expenses or those that are unreasonable for a member of staff to reclaim on travel expenses by causing financial difficulty/hardship.
- 6.22 All goods ordered using the card should normally be delivered to the CCGs premises, however, exceptions can be made when staff are mainly or exclusively working from home.

Guidance for internet purchases

- 6.23 Cardholders must use websites from known and reputable suppliers. A list of known suppliers is held by Shared Business Services. Cardholders should check with the Deputy Director of Finance (Corporate Accounting) if they are unsure of whether a supplier is included within this list.
- 6.24 Cardholders must only transmit card details using secure Web pages, for example those which use Secure Socket Layer (SSL) technology. A web page address that begins with https:// (instead of http://) indicates the page uses SSL technology with encryption features.
- 6.25 The browser will automatically check that a recognised authority has issued the suppliers security certificate. If the cardholder has a screen message alerting of problems with the suppliers security certificate the cardholder must contact the card administrator before placing the order. With Internet Explorer and Edge web browsers, a locked padlock icon will appear at the bottom of the screen when viewing a secure web page. Data transmitted over a secure connection will be encrypted so unauthorised persons cannot read it.
- 6.26 The cardholder may only transmit card details through secure email. If there is suspected fraudulent transactions on monthly statements, the card administrator must be contacted immediately.
- 6.27 Users should click 'not to save' card details on websites so that the card number is not retained for future use. If necessary the CCG will apply for a corporate account or an alternative method of purchase should be investigated.

Administration

- 6.28 Each card holder or their nominated lead must complete transaction log (see [Appendix 2](#)).
- 6.29 It is important that all receipts are retained and attached to the transaction log. These will be retained for a period of six years to comply with Her Majesties Customs and Exercise (HMRC) legislation. The transaction log must be sent to the card administrator on the 1st working day of each month. If the card holder's transaction log is not received by the deadline the card administrator will contact the card holder to request details are sent immediately.
- 6.30 Each month, the card administrator will download a statement detailing all transactions carried out on the card. The card administrator will reconcile this to the card holder's transaction log for the same period.
- 6.31 Any discrepancies should be referred to the Deputy Director of Finance (Corporate Accounting) in writing with copies of relevant paperwork enclosed. Once the transaction log and statement have been agreed, the transaction log and the statement should be signed by the card administrator as evidence that the reconciliation has been carried out and is correct.

- 6.32 The finance team will arrange for each month's expenditure to be input into the ledger as per the codes supplied on the transaction log by the 4th working day of each month.

Audit

- 6.33 Random audits will be conducted annually for both prepaid card activity and retention of receipts and invoices. It is therefore most important that documentation is checked and filed promptly.
- 6.34 Improper use of the prepaid card is not acceptable and will be dealt with accordingly. Evidence or suspicions of fraudulent activity will result in a referral being made to the LCFS in line with the CCGs Fraud, Bribery and Corruption Policy. Counter fraud investigations may result in the application of a criminal sanction in accordance with the NHS Counter Fraud Manual.

7. Equality Act 2010 – Equality Analysis

- 7.1 The Equality Impact Assessment found that there would be no negative impact on people protected under the Equality Act (2010) (see [Appendix C](#)).
- 7.2 However, The facility to use the Prepaid Card to pay for expenses where it is unreasonable for a member of staff to pay in advance without causing financial difficulty / hardship has a positive impact.

8. Training considerations

- 8.1 All cardholders will be issued with a copy of the policy when applying for a prepaid card. The prepaid card administrator will ensure that the cardholders fully understand the policy and review it with the cardholder if necessary. Attendance at any training session carried out as a consequence of the policy implementation must be formally recorded and documented.

9. Dissemination/publication

- 9.1 This policy will be made available to staff via the StayConnected App. In addition, a copy of the policy will be shared with new card holders when a card is issued.

10. Monitoring

- 10.1 The cardholder is ultimately responsible for ensuring correct use of the prepaid card in line with this policy. The cardholders will check that the policy has been adhered to before making the payment. On a monthly basis during the prepaid card reconciliation process, the finance team will check all payments to ensure that the policy has been adhered to. On this basis, the policy will not require periodic audit to ensure compliance.

10.2 Random audits will be conducted annually for both prepaid card activity and retention of receipts and invoices.

11. Review and revision

11.1 This policy will be reviewed every two years by the Deputy Director of Finance (Corporate Accounting) to ensure continued validity and relevance.

12. Stakeholder / consultation information

12.1 The policy has been shared with the CCG's Local Counter Fraud Specialist for comment in September 2021.

13. References and links relating to this policy

- Standing Financial Instructions
- Standing Orders
- Scheme of Delegation
- Travel and Expenses Policy
- Local Fraud, Bribery and Corruption Policy
- Standards of Business Conduct and Managing Conflict of Interest Policy
- Procurement Policy

Appendix 1 Prepayment Card - Employee Agreement

I, _____, as an employee of NHS Hampshire, Southampton and Isle of Wight CCG, have been issued with a Prepaid card.

The value held on this card is _____ as agreed by the CFO.

As a card holder, I agree to comply with the following terms and condition pertaining to the card.

I have received, and understood that I am entrusted with a CCG prepaid card and will be making financial commitments on behalf of the organisation.

I understand that the prepaid card is in effect the CCGs money.

I agree to use this card for appropriate NHS Hampshire, Southampton and Isle of Wight CCG business purchases only and agree not to use the card to make personal purchases.

I understand that the CCG will audit the use of the card and report any discrepancies found. I also understand that appropriate action will be taken if required in line with the CCGs Disciplinary Policy, and a referral could be made to the Local Counter Fraud Specialist (LCFS) in line with the CCGs Fraud, Bribery and Corruption Policy. I understand that Counter Fraud investigations may result in the application of a criminal sanction in accordance with the NHS Counter Fraud Manual.

I will follow the established procedures for use of the card. Failure to do so may result in either revocation of my use privileges or any other disciplinary actions, including termination of employment and a referral being made to the LCFS for criminal investigation.

I agree to return the card immediately upon request or upon termination of employment.

If the card is lost or stolen I agree to notify the Deputy Director of Finance (Corporate Accounting) immediately by telephone and the card administrator as soon as possible thereafter.

Employee’s Signature _____

Print Name _____

Date _____

cc Employee's Personal File
Prepaid Card Administrator

Appendix 3 Equality Impact Assessment

Equality analysis

Title of policy, project or proposal:
Corporate Prepaid Card Policy

Name of lead manager: Deputy Director of Finance – Corporate Accounting
Directorate: Finance

Q1 What are the intended outcomes of this policy, project or proposal? This policy summarises how to use the prepaid card and what it is for.
Q2 Who will be affected by this policy, project or proposal? <i>Identify whether patients, carers, communities, CCG employees, and/ or NHS staff are affected.</i> Any individual employed by the CCG who is authorised to use the pre-paid card.

Evidence
Q3 What evidence have you considered? <i>Consider, for example, national drivers, local drivers, Public Health data, ONS data, and any pilots undertaken nationally or locally.</i>
Age <i>Consider and detail (including the source of any evidence) across age ranges on old and younger people.</i> There will be no impact on individuals regardless of their age.
Disability (physical and mental) <i>Consider and detail (including the source of any evidence) the impact on people with different kinds of disability (this might include attitudinal, physical and social barriers). Certain medical conditions are automatically classed as being a disability – for example, cancer, HIV infection, multiple sclerosis.</i> The impact of this policy is equal for all individual regardless of whether they have a disability or not.
Dementia <i>Given the CCGs commitment to commissioning “Dementia Friendly” services, consider and detail any impact on people with dementia.</i> There will be no impact on individuals regardless of whether they have dementia or not.
Gender reassignment (including transgender) <i>Consider and detail (including the source of any evidence) on transgender people. Issues to consider may include same sex/mixed sex accommodation, ensuring privacy of personal information, attitude of staff and other patients.</i> There will be no impact on individuals with regard to gender reassignment.

<p>Marriage and civil partnership <i>Note: This protected characteristic is only relevant to the need to eliminate discrimination within employment. Where relevant, consider and detail (including the source of any evidence) on working arrangements, part-time working, infant caring responsibilities.</i></p> <p>There will be no impact on individuals depending on marriage and civil partnership status.</p>
<p>Pregnancy and maternity <i>Consider how the policy project or proposal impacts on staff and detailed (including the source of any evidence) impact on Health and Safety at work and working arrangements such as part-time working, infant caring responsibilities. As well as service provision, where applicable, for service users consider facilities, such as child and parent parking, baby changing, breast feeding.</i></p> <p>There will be no impact on individuals dependent on pregnancy / maternity.</p>
<p>Race <i>Consider and detail (including the source of any evidence) the impact on groups of people defined by their colour, nationality (including citizenship), ethnic or national origins. This will include Roma gypsies, travellers, people from Eastern Europe, Nepalese and other South East Asian communities. It will also include language and different cultural practices and individual experience of health systems in other countries.</i></p> <p>There will be no impact on individuals depending on their race.</p>
<p>Religion or belief <i>Consider and detail (including the source of any evidence) on people with different religions, beliefs or no belief. May be particularly relevant when service involves intimate physical examination, belief prohibited medical procedures, dietary requirements and fasting, and practices around birth and death.</i></p> <p>There will be no impact on individuals depending on their religion or belief.</p>
<p>Sex (gender) <i>Consider and detail (including the source of any evidence) the impact on men and women (potential to link to carers below). This may include different patterns of disease for each gender, different access rates.</i></p> <p>There will be no impact on individuals depending on their gender.</p>
<p>Sexual orientation <i>Consider and detail (including the source of any evidence) the impact on heterosexual people as well as lesbian, gay and bisexual people.</i></p> <p>There will be no impact on individuals depending on their sexual orientation.</p>
<p>Carers <i>Consider and detail (including the source of any evidence) impact on people with caring responsibilities. This must include people who care for disabled relatives or friends (as specified in law to avoid discrimination by association) but should also consider patient/guardian(s) of children under the age of 18 years. Carers are more likely to have health problems related to stress and muscular-skeletal issues. They may have to work part-time, have shift-patterns, or face barriers to accessing services.</i></p> <p>There will be no impact on individuals depending on whether they are carers or not.</p>
<p>Serving Armed Forces personnel, their families and veterans <i>The needs of these groups should be considered specifically. The CCG has a responsibility to commission all secondary and community services required by Armed Forces' families where registered with NHS GP Practices, and services for veterans and reservists when not mobilised (this includes bespoke services for veterans, such as mental health services).</i></p>

<p>There will be no impact on serving Armed Forces personnel, their families and veterans.</p>
<p>Meeting psychological needs <i>The CCG is working to improve how services meet the psychological needs of patients. This recognises that an individual's experience of disease or illness, and/or their experience of treatment and time spent in care settings can cause stress and anxiety. This in turn, can impact on treatment and outcomes.</i> <i>Do you have evidence of additional or unmet psychological need? Identify how the project, policy or decision could better meet the psychological needs of patients and carers. This might include staff training in Mental Health First Aid, signposting patients to sources of mental wellbeing support, provision of peer support or psychological therapy.</i></p> <p>There will be no impact on individuals with regard to psychological needs.</p>
<p>Other identified groups <i>Consider and detail and include the source of any evidence on different socio-economic groups, area inequality, income, resident status (migrants) and other groups experiencing disadvantage and barriers to access. This may therefore relate to: Poverty, living in rural areas, resident status (migrants and asylum seekers).</i></p> <p>It is normally expected that staff pay for low value travel tickets in advance and claim the costs back via expenses. However, the card may be used for high value travel expenses or those that are unreasonable for a member of staff to reclaim on travel expenses by causing financial difficulty/hardship.</p>
<p>Involvement and consultation <i>For each engagement activity, briefly outline who was involved, how and when they were engaged, and the key outputs.</i></p>
<p>Q4 How have you involved stakeholders with an interest in protected characteristics in gathering evidence or testing the evidence available?</p> <p>N/A</p>
<p>Q5 How have you involved stakeholders in testing the policy or programme proposals?</p> <p>This policy is based on existing policies and processes in use within predecessor CCGs. It has also been shared with the CCG Local Counter Fraud Specialist and the Equality & Diversity Lead Manager for comment.</p>
<p>Q6 For each involvement activity, please state who was involved, how and when they were engaged, and the key outputs:</p> <p>N/A</p>

Equality statement

Considering the evidence and engagement activity you listed above, please summarise the findings of the impact of your policy, project or proposal. Consider whether the evidence shows potential for differential impact, if so state whether adverse or positive and for which groups.

The policy will have an equal impact on all individuals, however the facility to use the Prepaid Card to pay for expenses where it is unreasonable for a member of staff to pay in advance without causing financial difficulty / hardship has a positive impact

Positive impacts

Where there is evidence, provide a summary of the positive impact the policy, project or proposal will have for each protected characteristic, and any other relevant group or policy consideration. This should include outlining how equal opportunities will be advanced and good relations fostered between different groups.

The facility to use the Prepaid Card to pay for expenses where it is unreasonable for a member of staff to pay in advance without causing financial difficulty / hardship has a positive impact.

Negative impacts

Where there is evidence, provide a summary of the positive impact the policy, project or proposal will have for each protected characteristic, and any other relevant group or policy consideration. This should include outlining how equal opportunities will be advanced and good relations fostered between different groups.

There are no direct negative impacts from the policy.

Health inequalities

Please outline any health inequalities highlighted by the evidence (for example, differential access to services or worse health outcomes for particular groups or localities).

There are no direct health inequalities impacts from the policy.

However, the facility to use the Prepaid Card to pay for expenses where it is unreasonable for a member of staff to pay in advance without causing financial difficulty / hardship and so prevent anxiety / stress has a positive health impact.

Action planning for improvement, and to address health equalities and discrimination

Please give an outline of the key actions based on any gaps, challenges and opportunities you have identified. Include here any general action to address specific equality issues and data gaps that need to be addressed through consultation or further research.

Action	Person responsible	By date	Progress/ review (Add new actions if required)

For your records

Role of person who carried out this assessment:

Date assessment completed: 28 September 2021

Date to review actions: N/A

Role of responsible executive lead: Chief Finance Officer

Date assessment was approved: 18 October 2021 (Policy Sub Group)