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# Purchasing Card Procedure

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## 1. Purpose

Corporate Purchasing Cards (PCards) were introduced as a means of streamlining public sector purchasing and payment procedures, thereby achieving savings through improved administrative efficiency and more effective cash management.

Under the terms of the established [Common Use Arrangement \(CUAPC2019\)](#), the WA Country Health Service (WACHS) has entered into an agreement with National Australia Bank (NAB) for a Western Australian Purchasing Card.

## 2. Procedure

### 2.1 Governing Legislation

The issue and use of the Western Australian Government Purchasing Card is governed by the following legislation and policies.

Under section 53 (1) of the [Financial Management Act 2006](#) (WA) (FMA), the accountable authority is responsible for ensuring that the agency operates in a manner that is efficient, economic and achieves the agency's objectives.

[Treasurer's Instruction](#) (TI) 5 Expenditure and Payments, Requirement 2. Credit Cards sets out the use of Purchasing Cards by Public Authorities for the purpose of purchasing and accounts payable functions as follows:

- the accountable authority may arrange for a PCard to be issued to a person in line with business needs
- the PCard must not be used for a personal purpose. A 'personal purpose' is a purpose that is not directly related to performing functions for the agency.

The accountability and stewardship issues for PCards are the same as for all other payment methods and are set out in TI 5 Expenditure and Payments, Requirement 1. Authorisation of Payments and [Treasurer's Guidance Handbook](#) (TG) 5 Expenditure and Payments, Chapter 2. Payment Records.

In the development of this procedure, the [Western Australian Government Purchasing Card Guidelines](#), have been used as the basis to ensure continuity across government procedures and policies. The WA Government Guidelines above also outline the advantages of utilising PCards to deliver more flexible purchasing processes.

In conjunction with the above, cardholders must also comply with the requirements outlined in the WA Health [Financial Management Manual](#) (FMM) under [s625 Purchasing Cards](#) and [s625-A Purchasing Cards: Prohibited Items](#).

## 2.2 Overview

WACHS has approved the use of PCards as the preferred method of purchasing and paying for general purpose, low-value goods and services in circumstances where:

- the purchase of that category of goods and services is authorised
- this method of acquisition is more cost effective than utilisation of the iProcurement Supply System process.

In using PCards, WACHS staff must comply with Department of Finance policies on purchasing, including utilising Mandatory Whole of Health Contracts and [Common Use Arrangements](#) (CUAs) where applicable. Purchases can also be made under the [Western Australian Buy Local Policy 2022](#) where CUAs are non-mandatory and further savings can be achieved using local providers.

## 2.3 Scope for Use

As described above, the use of PCards is governed by a range of legislative and policy requirements that cardholders need to be aware of when using a WACHS PCard. This section outlines how and when PCards should be used and when it is inappropriate to do so. All WACHS purchasing is to be undertaken using only the following methods:

- via a Purchasing Card in line with approved policy, procedures and guidelines; and/or
- for assets above \$5,000, by using the iProcurement requisition process
- an approved Purchasing pathway as outline in FMM [s601 Purchase to Pay Pathways](#) and [s601-A Purchase to Pay Pathways](#).

### Cardholder's Duty of Care

Holding a WACHS PCard carries a great deal of responsibility. A cardholder who is found guilty of misuse or fraudulent use of a PCard is liable for prosecution under the [FMA](#), the [Criminal Code Compilation Act 1913](#) (WA) and the [Public Sector Management Act 1994](#) (WA).

Cardholders are to be aware that in being approved to hold a PCard, they have been placed in a position of trust and that a consequence of fraudulent misuse of a PCard may lead to prosecution. It is also noted that holding a WACHS PCard does not affect an individual's personal credit rating.

### Restriction on the Use of PCards

PCards **must not** be used to purchase:

- any of the prohibited items outlined in FMM [s625-A Prohibited Items](#)
- any item that is not for official purposes as defined under FMM [s602 Acceptable Expenditure for Official Purposes](#)
- items for which a purchase order has already been raised in the iProcurement system.

**Note:** A WACHS PCard is to be used only by the officer named on the card. It **must not, under any circumstances**, be shared with or be used by another individual. The cardholder **must not, under any circumstances** delegate authority to use their PCard to another person.

## Approval for Emergency Situations and Extraordinary Circumstances

All cardholders are to adhere to the restrictions governing the use of PCards at WACHS outlined under [Restriction on the Use of PCards](#). However, as a result of the nature of the business (where facilities may constitute the home of patients for example) there may exist some extraordinary circumstances which may require the purchase of items that appear to be of a personal nature (i.e. for the purchase of brandy for the Christmas pudding for aged care residents). There might also be an emergency situation that requires the use of a PCard to purchase a [prohibited item](#) to meet an operational need.

Under these limited and emergency or extraordinary circumstances, approval should be sought in writing from the Chief Executive or Executive Directors, or any other person authorised to do so under any applicable local policies and procedures. (See [WA Country Health Service Authorisation Schedule](#)).

**Note:** For these limited scenarios in:

- extraordinary circumstances, written approval must be obtained **prior** to the purchase; and in
- emergency situations, written approval may be obtained **after** the purchase but must be obtained **prior** to the 10<sup>th</sup> calendar day of the month following the transaction (to provide authorising officers with sufficient time to review by the 10<sup>th</sup>).

Records of the above must be kept with all other PCard documentation.

## Non-Prohibited Purchases – No Prior ICT Approval Required

Cardholders are encouraged to contact their local Information and Communication Technology (ICT) team to check availability of any pre-purchased Information Technology (IT) items, prior to purchasing. Where there is any doubt as to whether an ICT purchase is permissible, cardholders should seek WACHS ICT approval prior to purchasing using a PCard in the HFN-070 or HFN-080 Form.

The following items have been identified as acceptable purchases, and do not require WACHS ICT approval and no HFN-070 or HFN-080 is required (although normal policies and procedures governing acquisitions would still apply):

- apps from the Apple App Store or Google Play Store, when being purchased and used for official purposes, and where they are downloaded on a cellular network or within a secure WA Health network environment
- ‘Plug-and-Play’ computer peripherals purchased for official purposes, including:
  - keyboards, up to a value of \$80.00 each
  - mice, up to a value of \$50.00 each
  - webcams, up to a value of \$300.00 each
  - headphones (including headsets with microphone capabilities), up to a value of \$300.00 each
  - cables and cable adapters up to a value of \$50.00 each
  - power adapters and charges up to a value of \$100.00 each
- styluses, including ‘smart’ styluses (e.g. Surface Pro Pen, Apple Pencil) up to a value of \$190.00 each
- device cases, sleeves and carry bags up to a value of \$100.00 each
- any ICT peripheral recommended by Occupational Health and Safety (evidence must be uploaded to FlexiPurchase linked to the transaction).

Purchases of items specified above that exceed the specified values require ICT approval. Upon approval of an ICT request, users may be requested to process a purchase using a PCard, even if this was not specifically requested. These purchases are permissible if ICT approval is uploaded to FlexiPurchase and linked to the transaction.

**Note:** District level or program wide policies may dictate further restrictions on the appropriate PCard use for ICT purchases.

### Approved Uses of a PCard

All PCard purchases must comply with the Department of Finance [Procurement Act 2020](#) (WA). Goods and services available on CUAs should be purchased from the approved supplier. If the purchase is not covered by a contract, [WA Health procurement processes](#) must be followed as with any other payment method. The purchase can then be made either via a PCard in line with approved policies, procedures and guidelines, the supplier's CUA portal (where possible) or the iProcurement requisition process.

PCards are a versatile purchasing tool that may be used for purchases in the following circumstances:

- across the counter, where the cardholder uses Visa payWave or provides a Personal Identification Number (PIN)
- library subscription renewals, payment of utilities accounts and other similar expenses
- internet purchases, although cardholders are to ensure that:
  - the vendor is well-established and has a history of reliability
  - the website uses Secure Socket Layer (SSL) encryption (if the web address on the browser starts with https://, the 's' after http represents SSL)
  - all relevant documentation for the purchase is uploaded to FlexiPurchase and linked to the transaction, including tax invoices and receipts
- approved official travel, accommodation, and related expenses (including purchasing bus and train tickets for patient related travel), except for airline tickets – which should be purchased by a designated WACHS travel coordinator. Please note that:
  - WACHS travel coordinators do not need to have this specific title in their job title or duty defined in their job description form. This role should be designated to an appropriate staff member within the business unit
  - PCards can be used to book Air BnB accommodation if cardholders take care to ensure above safeguards are followed including ensuring the vendor is well-established and has a history of reliability etc. Please also refer to safeguards under [Internet Purchases](#)
- for capital works or capital purchases, noting that:
  - purchases must be coded to a Capital Works Entity (CWE) cost centre that has an active approved capital works project with a relevant Capital Projects (CAP) number
  - no assets (over \$5,000 threshold) are to be purchased with a PCard
  - a CAP99999 cost centre must not be used
- for selected ICT purchases, where no prior ICT approval is required. See [Non-Prohibited Purchases – No Prior ICT Approval Required](#)
- when purchasing food, please refer to MP 0142/20 [Healthy Options WA Food and Nutrition Policy](#).

**Note:** Suppliers are permitted to charge additional fees for the use of PCards. If a supplier charges a fee for use of PCards, the cardholder is to consider if the fee is excessive and if

using a PCard is the most appropriate means of payment. If the transaction proceeds, the cardholder is to ensure the tax invoice clearly outlines the fee charged.

## PCard Purchase Pre-Approval

Prior to a purchase being made, cardholders are to ensure that all transactions are approved by an officer with the appropriate delegation (see [WA Country Health Service Authorisation Schedule](#)).

Pre-approval to purchase can be gained in one of two ways:

- Cardholder has an approved delegation:
  - If the position occupied by the cardholder has an approved financial delegation under the Authorisations Schedule and the proposed purchase is within their delegation limit, they can proceed with the purchase without pre-approval.
  - This does not apply if the goods/services being purchased provides a personal benefit to the cardholder (i.e. course/conference attendance or subscription to professional organisation). In this instance, the purchase must be approved by another delegate like the cardholders' manager.
  - If a cardholder is unsure of their level of delegation, they can check with the PCard administrator. If the administrator is unavailable, written approval should be obtained from an officer with an appropriate delegation.
- Cardholder has no approved delegation:
  - If the cardholder has no financial delegation in the [WA Country Health Service Authorisation Schedule](#) or their delegated limit does not cover the value of the proposed purchase, then pre-approval must be obtained from an officer with an appropriate financial delegation. This can be obtained from other existing systems of pre-approval (like PATs, or the WACHS Travel booking system for example). If these existing systems are not available, then a [PCard Purchase Request Form](#) must be completed.
    - The PCard Purchase Request Form has been developed to ensure there is an auditable record of procurement requests, and authorisation whenever written approval is required.
    - Cardholders are to keep a record of the approved form and file with supporting invoices/receipts for audit purposes.

## Internet Purchases

As previously outlined, a WACHS PCard may be used to make purchases over the internet. Cardholders should take reasonable precautions to ensure the security of their purchases and ensure that purchases over the internet comply with all other purchasing policies and requirements previously outlined. See [buying and selling products and services](#).

In addition to the considerations outlined in [Approved Uses of a PCard](#), cardholders **must** also adhere to the following:

- Purchases are within the cardholder's financial delegation or there is written approval from an officer with the appropriate financial delegation.
- Procurement of **used goods** is not permitted unless prior approval is granted by a Tier 3 Director.
- Procurement of **new goods** must be from a registered business.
- Procurement of **new goods** from an individual, rather than a business, is not permitted unless prior approval is granted by a Tier 3 Director.
- Tax invoices must be able to be supplied by the individual or business.

- As with any other purchasing methods, staff are to avoid any procurement where an actual or potential conflict of interest arises, unless otherwise approved in writing by a person authorised to approve such purchases as per the [WA Country Health Service Authorisation Schedule](#).
- Cardholders are not to establish accounts with third party payment providers (e.g. PayPal), for the purposes of using their PCards to make purchases on the Internet. The cardholder may specifically make purchases on PayPal as a guest user, if the website owner or seller has enabled the 'Guest Checkout' function to do so.
- Cardholders are not to use 'Buy Now, Pay Later' services (or other similar payment splitting and credit services) to make purchases.
- To limit the occurrence of unintended use of Pcards, cardholders are discouraged from storing their PCards details anywhere. This includes but is not limited to, saving PCard details:
  - with a supplier, through an account or otherwise (unless for a subscription service)
  - in a digital wallet (e.g. Apple Pay, Google Pay etc.) on the phone
  - within the browser 'Autofill' features (or other similar services).

### Telephone and Fax Purchases

Purchases are **not** to be made over the telephone or fax unless there is no other alternative. When using a PCard to make purchases over the telephone, cardholders are to ensure that the following details are documented and retained, until written confirmation of the details have been received from the supplier (e.g. tax invoices and receipts):

- the name and Australian Business Number (ABN) of the supplier
- the date of the purchase
- a description of the goods and services purchased
- the amount to be incurred and the GST component of that amount (if any).

Some suppliers may require confirmation/authority of the details above in writing, prior to charging the PCard. PCard details should not be emailed to suppliers. Sending PCard details to external parties via email poses security and potential financial risks for WACHS.

Microsoft Outlook is able to detect when an email is sent with PCard details to parties outside of WA Health, with an alert message sent to the sender. If written confirmation is still required, send partial PCard details by e-mail and then contact the supplier directly to provide the remaining details. For example, if you are required to send a credit card authority form for accommodation bookings, complete the first 12 digits of the PCard and leave the last 4 digits and expiry dates blank. After sending this by email, please contact the supplier on the phone and provide the remaining details.

When purchases are made via fax, the cardholder is to take measures to ensure the security of the fax sent. This may include discussing the access to the fax messages and the record keeping procedures with the supplier.

The cardholder is also to ensure that all relevant documentation for the purchase is uploaded to FlexiPurchase and linked to the transaction, including tax invoices and receipts.

Do not email credit card details to suppliers.

## 2.4 Purchasing Card Administration

This section outlines how WACHS PCards, issued by NAB must be administered. It covers the requirements for staff applying for and approving the issuing of a WACHS PCard and the administrative procedures undertaken to manage and record the correct use and oversight of WACHS PCards.

### Administration Hierarchy

For the purposes of administration, the PCard administrative structure is a single entity under WACHS Finance to streamline governance and reporting processes. Refer to [Roles and Responsibilities](#) for the administration of WACHS PCards.

### Administrative Factors to be aware of:

- Before making a purchase on your PCard, consider if a more appropriate purchasing pathway is available, such as iProcurement.
- In some areas such as Aged Care, Palliative Care and Mental Health, Tier 3A (Executive Director) approval may be given to purchase 'specific special purpose' expenditure related to client/patient activities such as catering and items to celebrate special/festive occasions (refer [Restrictions on the use of PCards](#)), that would otherwise have been considered non-compliant.
- An appropriate card (monthly credit) and transaction line financial limit should be requested, noting that:
  - limits are to be set in line with the bands in FMM [s625 Purchasing Cards](#)
  - limits should not be too restrictive and be set at a realistic level to balance the appropriate level of governance; meeting procurement requirements and maintaining operational efficiency
  - requests for PCard limits in excess of \$20,000 must be supported by justification and must be approved by the WACHS Chief Finance Officer. This is in recognition that in some instances it may be appropriate to allocate large financial limits to specific positions. For example, supply managers may have to maintain a larger credit limit to respond in the event of an emergency; and
  - transaction limits are to be set at \$1,000 for Band 5 and \$5,000 for Bands 1 to 4, unless otherwise approved by the WACHS Chief Finance Officer or another person authorised to do so (as per the [WA Country Health Service Authorisation Schedule](#)). The PCard administrator will review transaction limits as a part of their monitoring function and apply them to existing cards where feasible.
- A default cost centres must be identified for every cardholder. Cost centres are used to recognise which budget at WACHS the expense is being charged to, and this default cost centre will be used in the event the purchases is not coded in a timely manner by the cardholder.
- All approved new and renewing applicants for PCards must complete the WACHS PCard eLearning Program prior to the issuing of the PCard to the individual.
- New authorising officers must also complete the training prior to being able to approve transactions in FlexiPurchase.
- Cardholders and authorising officers are to be provided with user manuals, passwords to FlexiPurchase, and a copy of this guideline at the time the PCard is issued.
- PCards cannot be issued to non-WACHS employees performing a function on behalf of WACHS (e.g. agency personnel or officers from other agencies representing WACHS).

## Notification of Breaches

Where there is a suspected breach of the legislation, relevant policy, this procedure or the Terms and Conditions of Use, the authorising officer or other WACHS staff member should immediately report the details of the breach to the PCard administrator. The PCard administrator, in conjunction with the authorising officer, may initiate the suspension or cancellation of an individual's PCard without notice by completing the, FMM [s625-5 FORM Application to Return or Reissue a PCard](#).

All serious breaches will be reported to the WACHS Chief Finance Officer.

## Notice of Personal Expense

If a transaction is non-compliant because it relates to a personal expense, and is identified as such, FMM [s625-3 FORM Notice of Non-Compliant Transaction](#) is to be completed by the cardholder and authorising officer and submitted to the accountable authority via the WACHS Chief Finance Officer within five (5) working days of the personal expense transaction being identified. A copy of the form is also to be provided to the PCard administrator and cardholder's line manager.

The cardholder is to repay the personal expense amount incurred within five (5) working days of becoming aware of the transaction. The WACHS Chief Finance Officer is to ensure that all notices related to personal expenses are retained on an official file for annual reporting purposes, and the accountable authority is notified of all outstanding debts relating to personal expenses, on a regular basis (at least quarterly).

## Notice of Non-compliance - Other

Where a non-compliant transaction is identified for any other reason than it relates to a 'personal expense', FMM [s625-3 FORM Notice of Non-Compliant Transaction](#) is to be completed. Where the non-compliant transaction is identified by the cardholder, they are responsible for ensuring that it is completed and submitted to the PCard administrator. Where identified by a party other than the cardholder, the authorising officer is responsible instead.

In either case, FMM [s625-3 FORM Notice of Non-Compliant Transaction](#) must be completed and sent to the authorising officer and then PCard administrator within five (5) working days of the non-compliant transaction being identified, and shall include either:

- where applicable, a statement of whether the cardholder agrees that the transaction was non-compliant, along with any relevant justification; and
- a description of the steps that will be undertaken to resolve any underlying issues and to prevent it from recurring in the future.

If the PCard administrator is satisfied with the response, they are to ensure the relevant actions are undertaken and that the response is retained on an official file. If dissatisfied, they are to liaise with the cardholder and/or their authorising officer to explore alternative solutions in order to reach a mutually agreeable resolution.

If a resolution cannot be reached or the cardholder fails to respond to the authorising officer (whom is to then refer the matter onto the PCard administrator), the PCard administrator may refer the matter to the WACHS Chief Finance Officer for further review and action, including:

- suspending or cancelling the PCard issued to the cardholder
- referring the matter for further investigation
- taking other appropriate disciplinary action.

The PCard administrator is to ensure that actions taken are documented and retained on an official file, and all relevant parties are appropriately notified.

## Purchasing Card Transaction Declaration

Where a cardholder is unable to produce a tax invoice or supporting documentation to substantiate a transaction, an FMM [s625-4 FORM Purchasing Card Transaction Declaration](#) is to be completed by the cardholder. The cardholder should send a copy of the form to the PCard administrator and upload the Form into FlexiPurchase linked to the transaction.

The PCard administrator is to monitor and maintain a register of all completed Form 625-4. The register can be accessed via [SharePoint – Business Services – Finance and FTE Reports – Compliance Reporting – PCard Compliance](#). The PCard administrator will investigate any cardholders who frequently utilise the Form 625-4 and escalate to the WACHS Chief Finance Officer and relevant Executive Director, as necessary.

## Training

The PCard administrator is responsible for arranging initial and refresher training (prior to receiving the replacement card when the previous card has expired usually every three (3) years) for PCard applicants and authorising officers which is available via the [MyLearning System](#). Refer to the [WACHS Government Purchasing Card \(WPCRD EL2\)](#) training program.

The PCard eLearning Program outlines the responsibilities of cardholders and authorising officers, as well as how to use FlexiPurchase. Applicants for PCards and authorising officers **must** complete the training prior to the PCard being issued to the individual.

## Security

The cardholder should take all reasonable steps to maintain the security of their PCard as per the NAB Terms and Conditions. In the event that a PCard is lost or stolen, the cardholder is to **immediately** notify NAB and the PCard administrator. To obtain a replacement card, the Cardholder must submit a FMM [s625-5 FORM Application to Return or Reissue a PCard](#) to the PCard administrator.

## 2.5 Duties and Responsibilities of Cardholders

All transactions made on a PCard will appear in the cardholder's online FlexiPurchase account within 48 hours of the purchase. The cardholder is to regularly review and code each transaction recorded in FlexiPurchase. The cardholder will receive weekly e-mail notifications identifying transaction(s) awaiting coding and a further e-mail on the second day of the month if transactions remain outstanding.

Cardholders are to:

- review and code all transactions to the appropriate expenditure account classification and cost centre by the 7th calendar day of the month following the transaction, cardholders should note that:
  - it is imperative for the cardholder to ensure that:
    - the transaction is valid and not fraudulent (see [Notice of disputed Transaction](#) for further information)
    - the appropriate expenditure account is identified
    - the purchase is charged to an appropriate cost centre
    - the identity / name of the vendor is clearly visible/articulated, for example, purchases where a payment intermediary (like PayPal) is used. In this case, it is the intermediary's details that appear on FlexiPurchase and not the name of the actual vendor
    - a full description of the goods purchased is provided in the relevant description sections.
- upload all tax invoices or supporting documentation into FlexiPurchase and link it to the correct transaction(s).

**Do not** forward copies of invoices for purchases made on your PCard to Accounts Payable or WACHS Finance, as it may result in a duplicate payment. Similarly, there is no need to raise requisitions/purchase orders for goods and services already purchased with a PCard.

**Cardholders are to note that:**

- If a cardholder regularly fails to code transactions in a timely manner their PCard may be suspended by the PCard administrator.
- Where there are either transactions un-coded for more than three (3) months, or transactions unapproved for more than six (6) months, the PCard can be suspended.
- If a PCard is suspended, the cardholder will need to contact the PCard administrator to seek to have the card reactivated.
- Continual failure to code PCard transactions on time may result in the cancellation of the PCard. Live compliance reporting can be accessed via [SharePoint – Business Services – Finance and FTE Reports – Compliance Reporting – PCard Compliance](#).
- In circumstances where coding is not complete by the tenth day of the month, those items not coded will be posted to a predetermined account code (determined by WACHS Finance) within the cardholder's default cost centre until correctly coded.
- It is the cardholder's responsibility to arrange for any further journal transfers to clear the entry in the event this needs to be rectified (to address budget variances for example).

**Absence of Cardholder or Authorising Officer**

If a cardholder goes on leave for a period of three (3) months or more, they are to:

- return their PCard to their authorising officer for safekeeping, prior to going on leave
- notify the PCard administrator as soon as possible of the period of leave, so that the PCard can be temporarily deactivated (deactivating a card will be achieved by setting the monthly credit limit to a nominal value, such as \$1).

For planned periods of leave shorter than three (3) months, cardholders are to consider implementing safekeeping measures, such as:

- notifying their authorising officer and the WACHS PCard administrator, so that a temporary decrease can be placed on the PCard during the shorter absence
- physically handing the PCard to their authorising officer for safekeeping
- leaving the PCard in a physically secure area at the workplace or at home.

If the planned period of leave will prevent the cardholder from coding their transactions within the required timeframe upon their return, they are to code the transactions prior to their leave wherever possible.

Where a cardholder is seconded to another position, their PCard is to be returned to their authorising officer for safekeeping, and the PCard administrator is to be notified so that the card can be deactivated

Where an authorising officer goes on leave during the approval timeframe or vacates their position, they or the cardholder are to notify the PCard administrator and ensure an appropriate officer covers or replaces them.

## 2.6 Notice of disputed Transaction

If the cardholder has reason to dispute a transaction, the cardholder is to immediately contact the vendor to seek clarification and arrange for a refund. If the matter cannot be resolved with the vendor, or the transaction appears to be fraudulent, the cardholder is to generate a Disputed Transaction Advice Form using FlexiPurchase.

### Notice of Personal Expense

If a transaction relates to a personal expense, the cardholder is to submit a FMM [s625-3 FORM Notice of Non-Compliant Transaction](#) to the PCard administrator and repay the funds within five (5) working days of becoming aware of the transaction.

The notice should include:

- name, HE number and position of the cardholder
- name, HE number and position of the Authorising Officer
- details of the usage of the PCard for personal expenses, and the circumstances giving rise to that usage, including the goods and services purchased; the date of purchase, the name of the vendor and the reason why the PCard was used by the cardholder,
- amount of personal expenses incurred
- whether repayment of the amount incurred has been made by the cardholder.

The cardholder is to ensure that the amount incurred is paid back to WACHS within five (5) working days of becoming aware of the transaction. If the amount remains outstanding after that time, an invoice is to be raised, and the cardholder recorded as a debtor in the General Ledger.

The WACHS Chief Finance Officer (in conjunction with the PCard administrator) is to ensure that all notices related to personal expenses are retained on an official file for annual reporting purposes, and the accountable authority is notified of all outstanding debts relating to personal expenses, on a regular basis.

## Duties and Responsibilities of Authorising Officers

The authorising officer is generally the direct line manager of the cardholder. This position reviews and approves transactions recorded in FlexiPurchase for each cardholder. Automated e-mail reminders are sent via FlexiPurchase to remind approvers to review cardholder purchases on a regular basis. Authorising officers are to:

- review and approve all purchases of cardholders under their supervision, in a timely manner, noting:
  - approval for each transaction should only be made where the original supporting tax invoice/receipt has been reviewed, (for how to identify a tax invoice, see the ATO's fact sheet on [Issuing Tax Invoices](#))
  - in the event that a tax invoice/receipt is not able to be obtained, a FMM [s625-4 FORM Purchasing Card Transaction Declaration](#) must be provided by the cardholder to assure the authorising officer that the purchase is in line with the approved policy
  - the text "625-4" should be included in the Details of Transaction whenever a Form 625-4 is utilised.
- ensure approvals are completed monthly.
- monitor the ability and commitment of cardholders (or their approved nominee) to reliably and in a timely manner, reconcile and code all purchase transactions – noting that:
  - transactions are to be coded by the cardholder to the appropriate expenditure account classification and cost centre before the seventh day of the following month
  - cardholders are to supply the authorising officer with a copy of all the supporting tax invoice/receipt information for each transaction
  - it is preferable that coding and approvals be completed as regularly as possible
  - the authorising officer should review all supporting documentation before approving the expenditure online.

**Note:** Where an authorising officer fails to review and approve transactions for more than six (6) months, the cardholder's PCard can be suspended. If a PCard is suspended, the cardholder will need to contact the PCard administrator to seek to have the card reactivated upon approval by the WACHS Chief Finance Officer.

### 2.7 Application, approval, and issue of a WACHS PCard

Responsible officer	Action required
PCard administrator	<ul style="list-style-type: none"> <li>• Specific forms are uploaded to the <a href="#">Purchasing Card Intranet</a> site (<a href="#">New Application Forms and Related Documents</a>).</li> </ul>
Applicant	<ul style="list-style-type: none"> <li>• The Applicant, in consultation with their line manager, considers their requirement for a PCard in line with the scope and restrictions for use outlined in this procedure.</li> <li>• Applicant reviews and completes the relevant Application Form <b>and</b> Terms and Conditions document including:                             <ul style="list-style-type: none"> <li>○ complete personal information</li> <li>○ provide certified copies of identification to complete a 100-point identification check</li> <li>○ signs the Terms and Conditions document</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ arranges for the application to be signed by a Tier 4 or higher.</li> <li>● Submits the completed application and documents to the PCard administrator.</li> <li>● The WACHS PCard training module must be completed by the cardholder prior to taking possession of the card.</li> </ul>
PCard administrator/ NAB authorising officer	<ul style="list-style-type: none"> <li>● PCard administrator considers application and checks all forms for accuracy, completeness and required approval signatures.</li> <li>● NAB authorising officer reviews certified copies of the necessary identification as per the <a href="#">Cardholder Identification Requirements</a> for 100-point identification check.</li> <li>● NAB authorising officer signs authorised officer's signature box on the application form.</li> <li>● PCard administrator or NAB authorising officer forwards to NAB for processing, or processes application through NAB Connect.</li> </ul> <p><b>Note:</b> Credit card limits must be set at one of the following bands, unless otherwise approved by the WACHS Chief Finance Officer:</p> <ul style="list-style-type: none"> <li>● Band 5 – Low Threshold user \$1,000</li> <li>● Band 4 – Standard User \$5,000</li> <li>● Band 3 – Moderate User \$10,000</li> <li>● Band 2 – High Threshold User \$20,000</li> <li>● Band 1 – Premium User \$50,000.</li> <li>● Applications for PCards with financial limits exceeding \$20,000 must be forwarded to the WACHS Chief Finance Officer for approval. (See also <a href="#">Requests for Limit Increases</a>).</li> </ul>
PCard administrator	<ul style="list-style-type: none"> <li>● Maintains and updates FlexiPurchase with applicants, any purchasing restrictions and required exemptions.</li> <li>● Completes and maintains the PCard hierarchy tables in FlexiPurchase for approved cardholders and authorising officers.</li> </ul>
National Australia Bank	<ul style="list-style-type: none"> <li>● Once approved and processed, PCards will be sent by NAB to the PCard administrator for issuing to the cardholder.</li> </ul>
PCard administrator	<ul style="list-style-type: none"> <li>● Advises the applicant that the application has been approved.</li> <li>● Confirms the best address with cardholder for the PCard to be posted to.</li> </ul>
PCard administrator/ Applicant	<ul style="list-style-type: none"> <li>● After confirming completion of eLearning package, the PCard administrator posts the PCard to the applicant.</li> <li>● The cardholder must sign the signature panel on the PCard immediately upon receipt.</li> <li>● User manuals, passwords to FlexiPurchase and a copy of this policy is to be provided at the time the PCard is posted (this may be via email).</li> </ul>

PCard administrator	<ul style="list-style-type: none"> <li>• Maintains files for application forms and other application documentation.</li> <li>• Signed applications must be filed in a secure location for audit purposes.</li> </ul>
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**Requests for Limit Increases**

Monetary limits are set by National Australia Bank (NAB) for monthly credit limits and transaction limits per cardholder. There is also a Facility Limit per NAB Billing Account.

**Individual PCard Limit Increase**

If a cardholder is regularly reaching their monthly PCard credit limit (i.e. the PCard is ‘maxed out’ each month) or they need to make a purchase which currently exceeds their transaction limit, the cardholder can request approval to increase the card financial limit.

**Note:** Increasing the individual PCard limit does not negate the requirement for the cardholder to gain pre-approval from a person with the appropriate financial delegation level for the transaction (See [PCard Purchase Pre-Approval](#)).

**Where the cardholder does not have a financial delegation to make the purchase, completion of the [PCard Purchase Request Form](#) prior to purchase is still required for each transaction.**

**2.8 Cardholder’s limit changes**

Requests to increase or decrease a cardholder's limit, require the completion of the below:

Responsible officer	Action required
Applicant / cardholder	<ul style="list-style-type: none"> <li>• Discuss request to increase limit with authorising officer (usually the line manager).</li> <li>• Submit a completed FMM <a href="#">s625-2 FORM Application to Change a PCard</a>, signed off by a Tier 4 or higher.</li> </ul>
PCard administrator / NAB authorising officer	<ul style="list-style-type: none"> <li>• <b>Consider the Facility Limit before approving increased individual PCard limits</b> (see <a href="#">Facility Limit Increase</a>).</li> <li>• Increases up to \$20,000 can be approved by a Tier 4 or higher. Limits in excess of \$20,000 must be approved by the WACHS Chief Finance Officer.</li> <li>• PCard administrator or NAB authorising officer submits limit change request to NAB or actions limit change via NAB Connect.</li> <li>• Final signed documentation is to be filed with the original application forms and documentation.</li> </ul>

## 2.9 Contact Details

### General Queries

For any queries relating to the application of this procedure, please contact the PCard administrator in the first instance.

### WACHS Finance

PCard administrator

Phone: (08) 6372 2227

E-mail: [WACHSPCards@health.wa.gov.au](mailto:WACHSPCards@health.wa.gov.au)

Please refer to the [Finance Services](#) page on SharePoint for contact details.

### National Australia Bank

#### General Queries

Phone: 13 10 12

E-mail: [client.services@nab.com.au](mailto:client.services@nab.com.au)

#### Lost or Stolen Cards

Phone: 1800 033 103 (within Australia)

+61 3 8641 9121 (from overseas 24 hours, 7 days)

**Advise NAB directly, then contact your PCard administrator ASAP.**

#### FlexiPurchase Support (PCard administrators only)

E-mail: [FlexiPurchasesupport@fraedom.com](mailto:FlexiPurchasesupport@fraedom.com)

## 2.10 Monitoring and compliance of PCard transactions

### PCard Analysis report

The Manager – FAAR will regularly review the WACHS PCard Analysis report for WACHS wide compliance with PCard timeliness requirements.

### Non-compliance reporting

On the first working day following the 7<sup>th</sup> calendar day of the month, WACHS Finance will review transaction data to determine if transactions have been coded on time.

On the first working day following the 10<sup>th</sup> calendar day of the month, WACHS Finance will review transaction data to determine if transactions have been approved on time. Non-compliance information will be available on [SharePoint – Business Services – Finance and FTE Reports – Compliance Reporting – PCard Compliance](#).

Transactions relating to personal expenses, that are not repaid within five (5) working days of being identified, should be reviewed for invoicing to the cardholder by WACHS Finance.

The PCard administrator will inform staff members (and their line managers), who have committed non-compliance in:

- the latest month and
- at least three (3) of the latest four (4) months.

## Automated and Routine Monitoring of Transactions and Issued Cards

Automated scripts on NAB FlexiPurchase will trigger for a defined population of transactions and will result in email reminders being sent to the relevant cardholder where the transaction:

- has not been approved in FlexiPurchase
- is assigned to Account Code 346700 – *Unassigned Transactions PCard*

The PCard administrator will also review transaction limits as a part of their monitoring function and apply them to existing cards where feasible.

## Audits and Reviews

Audits and reviews of the PCard regime at WACHS are carried out to both improve compliance with the requirements from various sources, and to reduce certain natural risks associated with the volume of PCards used at WACHS.

WACHS Finance will:

- carry out a monthly review of flagged transactions by keyword to determine if any require further investigation for potential non-compliance
  - the list of keywords will be maintained by Coordinator – General Ledger and PCard administrator
- carry out quarterly audits in line with the [Purchasing Card Audit Procedure](#)
- conduct an annual review focusing on dormant or low usage cards to identify PCards that:
  - could be cancelled
  - could have reduced limits due to low or under-utilisation
- review monthly employee termination reports to ensure that PCards are cancelled for all terminated employees.

Records and outcomes of these review procedures are to be maintained on an official file and reported to the WACHS Finance and Performance Sub-Committee every month.

The PCard administrator is to notify cardholders who have been identified to have their PCard cancelled or have their monthly credit limit reduced. All notices provided, and responses received from cardholders are to be documented and retained on an official file.

## Annual Reporting to the WACHS Finance and Performance Sub-Committee

Each year, a report will be presented to the WACHS Finance and Performance Sub-Committee by the WACHS Chief Finance Officer, that includes the following details:

- non-compliance reporting
- a breakdown of cardholders whose limits exceeded \$20,000 and the justification for the higher limit
- spend analytics with comparisons to prior year
- details of facility limit changes

### 3. Roles and Responsibilities

The centralised PCard administrative structure enables WACHS to have better oversight in managing the administration of WACHS PCards. Under this structure, the overall responsibility for oversight of WACHS PCards remains with the WACHS Chief Finance Officer; and the day-to-day administration and management is the responsibility of the PCard administrator.

WACHS Finance staff have been appointed to the following PCard administrative positions with area wide authority and FlexiPurchase functionality:

- Chief Finance Officer: NAB authorising officer
- Manager – FAAR: NAB authorising officer
- Coordinator – General Ledger: NAB authorising officer & PCard administrator
- PCard administrator: PCard administrator

The positions are then to be registered with NAB (See details under [Appointment of PCard Administrator/Authorising and Verifying Officer](#)):

The **NAB authorising officer** is responsible for monitoring compliance with this procedure. This involves approving all PCard functions including new applications, changes to PCard financial limits up to \$20,000, card suspensions and verifying certified copies of the necessary identification to establish that new PCard applicants have satisfied the 100-point identification check. Please note, authorising officers are required to undergo a 100-point ID check at a NAB Branch.

The **PCard administrator** is responsible for facilitating the operation of PCards including the day-to-day management of the PCard process, maintenance of FlexiPurchase and PCard hierarchy, generating automated reminder emails via FlexiPurchase to cardholders, authorising officers for coding and completion of transactions and providing guidance and assistance to cardholders where required.

The **cardholder** is responsible for compliance with the range of legislative and policy requirements outlined in this procedure and will be held accountable for any non-compliance.

Please note that in relation to NAB, the FlexiPurchase help desk will only respond to FlexiPurchase queries made by an approved **FlexiPurchase Representative**. NAB will only respond to queries and instructions relating to the PCards from an authorised **NAB account representative**

**All staff** are required to comply with the directions in WACHS policies and procedures as per their roles and responsibilities. Guidelines are the recommended course of action for WACHS, and staff are expected to use this information to guide practice. If staff are unsure which policies procedures and guidelines apply to their role or scope of practice, and/or are unsure of the application of directions they should consult their manager in the first instance.

## 4. Monitoring and Evaluation

WACHS Internal Audit and the Office of the Auditor General (OAG) may conduct regular audits of WACHS PCard usage and compliance with government policy and this procedure. All records necessary to evidence compliance with this procedure should be retained on an official file.

An evaluation of the effectiveness of the procedure will be undertaken through feedback from cardholders and through any findings from WACHS Internal Audit or the OAG.

## 5. References

Financial Management Manual (FMM): FMM s625 - Purchasing Cards v2-00. Department of Health Financial Management Policy. [accessed 15 October 2025]. Available from: <https://healthpoint.hdwa.health.wa.gov.au/FinanceGroup/Pages/Chapter-6-Expenditure-Management.aspx>

Financial Management Manual (FMM): FMM s625-A - Prohibited Items v1-00. Department of Health Financial Policy. [accessed 15 October 2025]. Available from: <https://healthpoint.hdwa.health.wa.gov.au/FinanceGroup/Pages/Chapter-6-Expenditure-Management.aspx>

Common Use Arrangements (CUAs). Government of Western Australia. [accessed 15 October 2025]. Available from: <https://www.wa.gov.au/government/cuas/common-use-arrangements-cuas>

WA Buy Local Policy. Government of Western Australia. [accessed 15 October 2025]. Available from: <https://www.wa.gov.au/government/document-collections/wa-buy-local-policy>

Guidance on Procurement Processes. Health Support Services HealthPoint Online. [accessed 15 October 2025]. Available from: <https://wahealthdept.sharepoint.com/sites/hss-customer-governance-support/SitePages/Guidance-for-Procurement-Processes.aspx>

Buying and selling products and services. Department of Local Government, Industry Regulation and Safety. [accessed 15 October 2025]. Available from: <https://www.consumerprotection.wa.gov.au/buying-and-selling-products-and-services>

MP 0142/20 Healthy Options WA Food and Nutrition Policy. Department of Health Public Health Policy. [accessed 03 February 2026]. Available from: <https://www.health.wa.gov.au/About-us/Policy-frameworks/Public-Health/Mandatory-requirements/Chronic-Disease-Prevention-and-Health-Promotion/Healthy-Options-WA-Food-and-Nutrition-Policy>

## 6. Definitions

Term	Definition
<b>Authorising officer/NAB authorising officer</b>	The line manager of the cardholder, or another person who has personal visibility over the transactions made by the cardholder.
<b>Cardholder</b>	The person listed as the cardholder for the PCard in FlexiPurchase.
<b>PCard administrator</b>	Officers who are registered as such with National Australia Bank and responsible for administering the PCard hierarchy and FlexiPurchase.  <a href="mailto:WACHSPCards@health.wa.gov.au">WACHS PCards &lt;WACHSPCards@health.wa.gov.au&gt;</a>

## 7. Document Summary

<b>Coverage</b>	WACHS wide
<b>Audience</b>	All staff
<b>Records Management</b>	Non Clinical: <a href="#">Corporate Recordkeeping Compliance Policy</a>
<b>Related Legislation</b>	<a href="#">Criminal Code Compilation Act 1913</a> (WA) <a href="#">Financial Management Act 2006</a> (WA) <a href="#">Public Sector Management Act 1994</a> (WA) <a href="#">Procurement Act 2020</a> (WA)
<b>Related Mandatory Policies / Frameworks</b>	<ul style="list-style-type: none"> <li>• <a href="#">Financial Management Policy Framework</a></li> <li>• MP 0142/20 <a href="#">Healthy Options WA Food and Nutrition Policy</a></li> </ul>
<b>Related WACHS Policy Documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">Purchasing Card Audit Procedure</a></li> </ul>
<b>Other Related Documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">Financial Management Manual</a></li> <li>• <a href="#">WA Country Health Service Authorisation Schedule</a></li> <li>• <a href="#">Western Australian Government Purchasing Card Guidelines</a></li> </ul>
<b>Related Forms</b>	<ul style="list-style-type: none"> <li>• <a href="#">PCard Purchase Request Form</a></li> <li>• <a href="#">Appointment of PCard Administrator/Authorising and Verifying Officer</a></li> <li>• <a href="#">New Application Forms and Related Documents</a></li> <li>• <a href="#">Cardholder Identification Requirements</a></li> <li>• FMM <a href="#">s625-2 FORM Application to Change a PCard</a></li> <li>• FMM <a href="#">s625-3 FORM Notice of Non-Compliant Transaction</a></li> <li>• FMM <a href="#">s625-4 FORM Purchasing Card Transaction Declaration</a></li> <li>• FMM <a href="#">s625-5 FORM Application to Return or Reissue a PCard</a></li> <li>• <a href="#">Facility Limit Increase</a></li> </ul>
<b>Related Training</b>	Available from <a href="#">MyLearning</a> : <ul style="list-style-type: none"> <li>• WACHS Government Purchasing Card (WPCRD EL2)</li> </ul>
<b>Aboriginal Health Impact Statement Declaration (ISD)</b>	ISD Record ID: 4676
<b><a href="#">National Safety and Quality Health Service (NSQHS) Standards</a></b>	1.07c
<b><a href="#">Aged Care Quality Standards</a></b>	Nil.
<b><a href="#">Chief Psychiatrist's Standards for Clinical Care</a></b>	Nil.
<b>Other Standards</b>	<a href="#">Treasurer's Instruction</a> TI 5 <a href="#">Treasurer's Guidance Handbook</a> TG 5

## 8. Document Control

Version	Published date	Current from	Summary of changes
5.00	19 February 2026	19 February 2026	<ul style="list-style-type: none"> <li>updates in line with PCard – Inadequate coding and approvals of transactions finding, relating to mandatory coding, approvals and non-compliance reporting</li> <li>updates in line with change of practice, language/concept design changes and roles to existing purchase card procedures.</li> </ul>

## 9. Approval

<b>Policy Owner</b>	Executive Director Business Services
<b>Co-approver</b>	Nil
<b>Contact</b>	Manager, Financial Accounting, Analysis and Reporting
<b>Business Unit</b>	Business Services - Finance
<b>EDRMS #</b>	ED-CO-13-83367
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