Scottish Government Electronic Purchasing Card (ePC) Policy

May 2022

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Electronic Purchasing Card (ePC) Policy

September 2021

It is mandatory for all card holders and nominated hierarchy to comply fully with this policy and respect the responsibilities and tasks associated with card use.

Support and user guides
electronic-purchasing- cards-guide-for-public-bodies/

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This policy is owned by the ePC Team, Scottish Procurement & Property Directorate

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1.   ePC Overview

1.1   The core Scottish Government (SG) and a number of its partners use electronic Purchasing Cards (ePC) to purchase and pay for appropriate goods and services that are generally:

- unavailable on an existing public sector contract; and/or
- where the supplier is not registered on EASEbuy/PECOS, the government's purchasing system

1.2   The ePC provides a quick and efficient means of payment for appropriate goods and services, largely but not limited to low-value, one-off or annual expenditure (not on a contract). It allows a greater degree of flexibility for the government and partners to buy goods and services from any location, fixed or mobile, that has internet connection (excluding Blackberry devices) and where the supplier accepts MasterCard as a payment method.

1.3   Rigorous authorisation and monitoring processes are in place to safeguard the organisation and individuals against any potential reputational risk due to inappropriate or fraudulent use of the card and/or card information.

1.4   The government's [contract for the ePC arrangements](#) is provided by the Royal Bank of Scotland (RBS), who use the MasterCard platform to record transactions made by cards electronically via their transaction system, Smart Data onLine (SDoL).

1.5   To access SDoL, users must provide specific details to the ePC Team. A hierarchy of card holder, approver and controller must be established and maintained by the card user or controller, who will submit any application for a card.

1.6   It is mandatory for card holders (the individual named on the card) to include on SDoL an appropriate description and that the appropriate financial information (cost centre, account code, sub analysis 1, 2, 3 and programme code) is noted of the expenditure undertaken. Card approvers are responsible for ensuring that financial information is correct, there is a comprehensive expenditure description and quotes are attached to the transaction.

1.7   ePC's are issued in the name of an individual card holder, who is the only person permitted to undertake purchases on that card. That card or card information should not under any circumstances be shared, loaned, borrowed or used by anybody else, including by another card holder.

1.8   Each ePC card holder is set up with a default cost centre that they provide on the financial information submitted with the card application.

1.9   To support a monthly review process and enable recharging of costs to

business areas, all reviewing and approving of transactions **must be completed by the end of the second working day of the following month**. This is the cut-off point for transaction review and approval and transactions cannot be amended after this date. Failure to do so may result in transactions being allocated to the default accounting details for each cardholder.

1.10   For each ePC transaction there are time limits for review and approval. **It is best practice that card holders and approvers review and approve each transaction as quickly as possible**. This ensures that any errors or concerns are quickly addressed, and avoids 'stockpiling' actions for the end of an accounting period. As the monthly deadline nears, transactions will need to be reviewed and approved more quickly to ensure that this is done within the correct accounting period. Rather than waiting until the end of the month, it is **best practice** for:

The Card *Holder* to:
- review each transaction for accuracy **within 5 working days** of appearing on SDoL (transactions usually appear on SDoL within 48 hours) or as soon as practicable
- (after reviewing the transaction) notify the nominated card approver through the SDoL system (sending a message) **no later than 7 working days** after the transaction appears on SDoL or as soon as practicable

The Card *Approver* to:
- approve the transaction description, financial information on SDoL **within 10 working days** of the transaction appearing on SDoL. They should also ensure that the cardholder has complied with competition requirements and attached, where appropriate, quotes. Card approvers are required to tick the 'approved' box on SDoL.
  If the transaction does not meet the requirements stated above, the approver should reject the transaction by unticking the reviewed box on SDoL and request the cardholder amends the transaction details. If it cannot be amended a request should be made from the relevant card controller and sent via iFIX. If they do not have access to iFIX they send to the ePC team via their business email account

Card *Holders*, *Approvers* and *Controllers* have a collective responsibility to inform the ePC Team in good time of changes to hierarchy or roles.

1.11   These arrangements provide an important expression of the government's commitment to assist the cash flow of businesses and support economic growth through improved payment performance. They support the commitment to transparent government, permitting wider access to the information it holds under the Open Government Partnership 'pioneer' status. They apply the most efficient purchase to pay process for the appropriate 'goods and services in line with our ambitions to reduce the costs of government administration, and contribute to our prompt payment commitment to pay all suppliers within 10 working days.

Scrutiny

1.12   ePC arrangements are subject to FoI (Freedom of Information) requests and/or other forms of public scrutiny (for example, media enquiries). They can also attract attention as:

- there is a ministerial commitment to publish all SG ePC transaction activity of £500 and over on the SG website on a monthly (retrospective) basis. Partners are responsible for their own publication arrangements and the commitment does not apply to them.
- ePC expenditure is reported under the payment policy section of the government's annual consolidated accounts.
- Audit Scotland and SG internal auditors undertake periodic reviews of our ePC arrangements.

1.13   **Before committing expenditure to an ePC the transaction must be justified and due consideration given to the scrutiny it could attract.**

2.   Using the card

Before using a card

2.1   It is the responsibility of business areas (unless specified otherwise, meaning core government and partners using ePC) to ensure that any card under their responsibility is <u>used only to purchase appropriate goods and services</u>. This extends to providing assurances to the **card controller** that prior to the purchase of the goods and/or services concerned the appropriate checks have been undertaken to ensure that:

- a public sector contract or framework which could be used does not already exist; or
- the supplier is not already on EASEbuy/PECOS. A list of all active users is available in Saltire under the EASEbuy/PECOS pages.

Delegated Purchasing Authority

2.2   Many government business areas receive support from their local delegated purchasing officer (DPO), who have delegated purchasing authority (DPA) to undertake procurement contracts for their business area within their specified limit. The DPO is a valuable source of advice on purchasing matters, who can help to make the right buying choice for the goods and services required.

2.3   Core government staff do not need to hold DPA to be part of a card hierarchy. It is for government partners to determine whether similar arrangements regarding DPA are appropriate for their organisation.

Government collaborative contracts

2.4   Scottish Procurement and Property Directorate (SPPD), within the SG , have awarded a number of collaborative contracts - Scottish Government frameworks and

contracts - http://www.gov.scot/Topics/Government/Procurement/directory on behalf of the public sector in Scotland for a broad range of goods and services. **These contracts should be used, wherever possible**.

2.5   Where doubt exists, contact the relevant contract manager within SPPD to clarify whether the goods or services that are required could be provided 'on-contract'. This extends to specific devices/ products/ services that may not be listed on a contract presently, as this does not necessarily mean it cannot be sourced from a contracted supplier.

2.6   Contract items should be raised through our purchasing systems EASEbuy or PECOS and are paid using the embedded ePC card.

2.7   For general enquiries about the availability of goods or services through a contract, the Scottish Government Procurement Team are your first point of contact. Partners should contact those responsible for purchasing within their organisation for advice.

Competitive quotes
2.8   Where a contract does not exist or cannot be used, cardholders must ensure that any goods or services that are being purchased provide best value for money for public funds. Before reaching a decision to purchase:

- For purchases up to £1,000 – it is *good practice* for cardholders to obtain **one quote** for purchases made by telephone or in writing from the relevant supplier
- For purchases £1,000 and above – it is *recommended* that cardholders obtain **a minimum of three written quotes** from different suppliers

(Note: Any decision to purchase should be based on both quality and price.)

2.9   It is the responsibility of cardholders and good practice to retain securely – either by uploading to SDoL or saving within eRDM – relevant quotations for all purchases with ePC, in particular those over £1,000 and all purchases that may be subject to scrutiny.

Transaction limits
2.10   Card transaction expenditure generally applies to a:
- single item transaction limit of up to a maximum of £5,000; and
- monthly transaction limit of up to a maximum of £25,000
for the goods and services being requested. In both cases, this excludes VAT.

Note: During the lockdown period, commenced in Spring 2020, the single item

transaction limit was raised to £10,000 and monthly transaction limit raised to £50,000. These limits will be reviewed in April 2022.

Increasing expenditure limits (for one off payments)
2.11   Cardholders can request an increase to one or both of these limits to meet a particular circumstance, should there be good reason to do so. A request should be made from the relevant card controller and sent via iFIX. If they do not have access to iFIX they send to the ePC team via their business email account outlining the circumstances for a temporary or permanent limit increase. **A temporary limit default duration is set for 14 days unless agreed and documented otherwise**.

Split transactions
2.12   Cardholders must not 'split' a transaction to overcome their single item limit of £5,000 (or where their limit is set lower or higher). If a split transaction is identified, an automatic suspension may be invoked, pending investigation by the ePC Team. It will require the intervention of a Director, Deputy Director or equivalent to unlock the suspension; and only where assurance is provided that local arrangements are now sufficiently robust to avoid any further occurrence on the card(s) concerned.

2.13   If you have a combination of purchases that could appear to be a split transaction contact the ePC Team in advance to discuss and record if required, to avoid a suspension. (For example – booking multiple delegates where suppliers only take one booking per delegate for a conference).

The recharge process – Paying for your transactions
2.14   The ePC Team recover all appropriate costs from cardholders for their purchases via a comprehensive 'recharge' process on a monthly basis. All new partners wishing to use ePC must confirm whether or not they use the government accounting system (SEAS). Partners using ePC are required at the outset to provide financial information to enable the monthly recharge process.

Publication of spend on the SG website
2.15   In line with the ministerial commitment, the government publishes a list of all transactions of £500 and over ('ePC500') on its website on a monthly (retrospective) basis. This is only mandated for the SG, all other partners can determine their won publication requirements.

2.16   **Prior to publication, cardholders are required to review their previous month's ePC transaction activity**. Those in the card hierarchy must ensure that the description input to SDoL accurately reflects what has been purchased. This may be required, for example, to respond to any Freedom of Information (FoI) or media enquiry.

2.17   The ePC Team review all ePC expenditure of £500 and over for core government spend on a monthly basis. Non-core government partners and agencies are responsible for their own publication arrangements. The published

information contains the following headings:

- **Directorate** – The name of the SG directorate which incurred the expenditure.
- **Merchant Name** – The name of the supplier who provided the goods or services purchased. The merchant could attract the umbrella name of the company group they are part of. On rare occasions the merchant name may be redacted for reasons of security.
- **Merchant Code Description** – The description applied by MasterCard to the goods/services provided. Suppliers who accept payment by ePC card are allocated a Merchant Code (MC). MC's provide a general description of the main type of goods/services that the supplier/group provides. It is not necessarily a description of an individual transaction with that supplier.
- **Transaction Date** – When the expenditure occurred.
- **Transaction Amount** (inclusive of VAT, where applicable) – the payment amount.
- **Expense description** - a brief description of the actual goods or services purchased.

3.   Value Added Tax, Transaction Fees & Foreign Transactions

3.1   On making a payment it is essential that you receive a Value Added Tax (VAT) invoice. You can only reclaim VAT paid when in receipt of a VAT invoice.

3.2   If you believe that the VAT on a transaction is recoverable, you must complete the necessary forms found on Saltire and **submit a copy of the VAT invoice to the VAT Advisory Unit**. If you do not identify recoverable VAT correctly when using your ePC, it could lead to unnecessary additional expenditure being incurred against your budget.

3.3   When using the ePC, you should ask the supplier to send the full item detail of the VAT information for the transaction - for each item being bought - or a VAT invoice. BAs should contact the [VAT Advisory Unit](#) for further help.

3.4   Non-core government partners should seek advice on such matters from their own VAT advisors.

Transaction fees
3.5   We do not incur any transaction charges from RBS for transactions in GBP.

3.6   Suppliers reach agreement with their own service provider regarding the transaction charges that apply for using this method of payment. **Cardholders should check with the supplier whether any service charge applies to a transaction being made and make judgement as to whether this is**

reasonable. (For example, a percentage based charge may on some larger amounts seem unreasonable, and the supplier could be asked if it is possible to waive this charge).

Foreign transactions
3.7   Overseas suppliers will normally charge and be paid for in their local currency (For example, for a transaction being carried out in the United States of America, the payment will be made in US dollars).

3.8   Once a supplier transmits their charge to RBS, the bank will convert this to GBP at the exchange rate applicable at the time. The commission charge is detailed separately on the card holder's transactions within SDoL. A percentage fee (confirmed by RBS at 2.75% at time of update for non-sterling transactions) of the total transaction value will be applied throughout the life of the existing contract arrangements with RBS.

3.9   All goods received from outwith the UK will be subject to importation tax. When making a purchase from outside the UK it is important that you submit a VAT 5 form to the VAT Advisory Team (VAT forms can be found on the VAT section on Saltire).

3.10   When buying items valued at less than £135 via an online marketplace the VAT will be charged and accounted for by the seller. Where you have purchased goods from outwith the UK and have provided your VAT registration number the business supplying the goods will zero rate the item, the VAT will then be charged by way of a reverse charge process on receipt of the relevant VAT 5 in the VAT Team. In cases where a service is received the place of supply of the service will decide on the VAT treatment. Instructions and guidance can be found on Saltire.

3.11   The VAT reverse charge process ensures that UK VAT registered companies are not unduly disadvantaged and as such it is important that you notify the VAT advisory Unit of any transactions carried out outwith the UK VAT system. Where doubt exists contact the VAT advisory Unit for help. Further information on VAT can be found on Saltire.

4.   Broader governance arrangements and Embedded cards

Scottish Public Finance Manual (SPFM)
4.1   All business areas are expected to be familiar with the Expenditure and Payments and Procurement sections of the SPFM which set out the context for the broader governance arrangements that apply to expenditure made on an ePC.

Supporting additional business needs outwith standard ePC Policy
4.2   The ePC Team can authorise the opening up of specific categories that would normally be applicable and/or any increase in the spending limits applied to cards for their area. The card hierarchy should be mindful of other government policies or

procedures, such as the provision of official hospitality, which might inform purchasing decisions when using an ePC.

Embedded (virtual) cards
4.3   The SG applies embedded card (also referred to as a 'virtual' card) arrangements for five of its contracted suppliers, providing the following goods or services:
- Catering
- Information Technology consumables
- Information Technology peripherals
- Stationery
- Vehicle Hire

4.4   These arrangements support low cost and regularly ordered goods and/or services, and guarantees immediate payment of goods rather than a need to match an invoice. To use an embedded card, an EASEbuy/PECOS requisitioner (NOT an ePC card holder) sends an approved purchase order to a supplier on EASEbuy/PECOS.

5.   Out of scope expenditure and exclusions

Travel and Subsistence
5.1   Separate procedures and processes apply within government for travel and subsistence (T&S) made on official business by individuals. The responsibility for this rests within the Directorate for People. It is important that the differences in operating arrangements are observed and where doubt exists you should contact your local T&S team or refer to T&S guidance can be found on Saltire

5.2   The *T&S chargecard* is a credit card covered by the ePC service, which is managed by the T&S Team in the Directorate for People. This card is used primarily by senior officials and those supporting Ministers, to pay for meals, personal incidental expenses, fuel for hire cards and minor ad-hoc hospitality.

5.3   Car hire, air or rail tickets can be paid for using the *T&S chargecard*, but only in emergencies where it is not possible to use SG contracts. Accommodation can be paid for using the *T&S chargecard*, but only where it cannot be booked and paid for through the Corporate Travel Management billback facility. Non travel and subsistence expenses are procured through the government accounting system.

5.4   To apply for a charge card you must be a permanent member of SG staff, a SG minister, or an agency who have their travel and subsistence claims processed and paid by the SG travel and subsistence team. **Temporary staff, consultants, contractors and other non-permanent staff are not eligible to apply**.

5.5   The charge card is issued to an individual and is not transferable. Only the cardholder's own travel and subsistence can be charged to the card. Guidance on applications and usage can be found on Saltire.

Specific exclusions
5.6   Exclusions apply to specific categories of spend which can not be made with the ePC. These are in place to safeguard business areas from organisational or reputational risk and card users from inappropriate card use.

5.7   Goods and services provided by suppliers are grouped into categories within SDoL, referred to as 'Merchant Category Codes'. There are specific exclusions to the following categories:
- MCC 13 Personal services
- MCC 26 Automotive fuel
- MCC 28 Auto rental
- MCC 29 Hotels and accommodation
- MCC 30 Restaurants and bars
- MCC 32 Leisure activities
- MCC 34 Cash withdrawals

5.8   For core government, MCC 26, 28, 29 and 30 are covered by T&S arrangements, or through contract or embedded purchases. In some circumstances these exclusions can be opened to meet specific business needs. MCC 13, 29, 30 and 32 have the potential to attract media interest. MCC 34 is permanently excluded - where an attempt is made to withdraw cash or use any other exclusion category the transaction will be blocked automatically by RBS. **To note: During the lockdown, all categories have been opened for card users, bar MCC13 Personal services, and MCC 34 Cash withdrawals. This remains in effect as at September 2021 and will be reviewed in April 2022 .**

5.9   A block can arise if the supplier is part of a larger group of companies that provide a range of goods/services some of which could attract a block. Where a cardholder feels that the block has been applied inappropriately they should contact the ePC Team.

Opening and closing exclusion categories
5.10   Cardholders may request different exception arrangements to help meet business needs. These will need to be agreed with the ePC Team in advance (and where appropriate, the Directorate for People).

5.11   Cardholders can make a case to open or close categories permanently to meet their particular operational need; or open a category to make a specific purchase and then close this again after the purchase has been made.

5.12   An explanation of the requirement and reasoning should be provided, by

either the business area Director, Chief Executive or equivalent, or the appropriate **card controller**, to the ePC Team from their relevant business email account.

5.13   The ePC Team retain the right to challenge and decline requests on a case by case basis. In such circumstances, the ePC Team would seek Internal Audit advice prior to reaching a final decision.

6.   Fraud and Risk

6.1   In line with the fraud and risk sections of the Scottish Procurement Finance Manual (SPFM), core government, partners are expected to apply all reasonable checks and precautions to avoid inappropriate, fraudulent use or theft of the ePC card or card information. Disciplinary or criminal proceedings may be taken, if necessary.

Local arrangements
6.2   The card hierarchy are expected to have local arrangements in place to ensure that all reasonable steps are being taken to protect and safeguard the card and card information both in and out of the office environment. This extends to ensuring that all those purchasing or 'commissioning' a purchase on an ePC are familiar with this policy and its supporting arrangements, and adopt and respect the appropriate behaviours regarding card usage.

Appropriate Card Usage
6.3   An ePC is issued in the name of an individual card holder. It is only the card holder (the person whose name appears on the front of the card) that is permitted to undertake purchases on that card. That card or card information **should not under any circumstances** be shared, loaned, borrowed or used by anybody else, including by another card holder. Where a breach of these arrangements is uncovered disciplinary procedures may apply.

7.   ePC Responsibilities and Hierarchy

7.1   There should be a clear hierarchal arrangement and chain of authorisation applied to each card. There are **3 roles required** to ensure a strict separation of duties between those ordering goods and/or services and those approving them. This safeguards public funds, ensures strict compliance with government arrangements and satisfies auditory requirements. Unless agreed otherwise with the ePC Team, a**ll members of a card hierarchy must be permanent members of staff within their organisation (SG Core and partners)**. The roles are:

- Card **Holder** – The owner and user of the card.
- Card **Approver** – Must be at band B level or above and at least one grade above the card holder (or equivalent in partner organisations). Reviews

financial information description and, where appropriate, ensures competition quotes are attached for each transaction.

- Card **Controller** - <u>Must be</u> at least band C1 level. Has the same access and rights in SDoL as an *approver*. If required they can undertake the role of approver (for example, to cover periods of leave or absence).

7.2   Should a hierarchy encounter difficult applying these roles, they should discuss potential alternative arrangements with the ePC Team. In such circumstances, advice will likely be sought from SG Internal Audit prior to decision.

7.3   Quarterly reviews of Hierarchy will be sent to all Card Controllers and confirmation required to ePC Team to advise if in agreement or changes required. Failure to comply may result in suspension of cards.

Mandatory responsibilities
7.4   ePCs are issued in the name of an individual card holder. **It is only the card holder** (the person whose name appears on the front of the card) **that is permitted to undertake purchases on that card.**

7.5   Card **Holders** must:
- Include on SDoL an appropriate description of the transaction, correct financial information and, where relevant, attach the quotes for the purchase. Card holders must also investigate and identify any issues on charges or credits. The ePC team are only there for escalation if there is a situation that cannot be fulfilled by the supplier to the cardholders requirements
- Review their transactions in SDoL within policy timescales.
- Quickly resolve any issues or inaccuracies and ensure transaction activity is sent to an approver within policy timescales

7.6   Card **Approvers** must:
- Approve transactions on SDoL ensuring that information on card activity is accurate, auditable and corresponds to the goods or services provided, within policy timescales. Card Approvers should also reject any transactions that do not meet the above criteria.
- Ensure the correct financial information has been applied to the purchase and that any VAT recovery has been actioned
- Ensure expenditure complies with policy requirements
- Support the card holder as required

7.7   **Card Controllers** must:
- Undertake regular checks to ensure policy and procedures are adhered to and ensure that the card holder and approver(s) actively reviews ePC spend

- Advise the ePC Team of hierarchy changes and put sufficient resource and proxy arrangements in place for card usage, monitoring and control
- Ensure that the rules around reviewing and approving transaction activity are being applied as required and issues like splitting transactions are avoided.

7.8   Where specific issues with card usage/behaviour are identified, the **card controller** must bring this to the attention of the ePC Team as quickly as possible. Failure to adhere may result in card suspension or cancellation.

Proxy and Alternate arrangements
7.9   Business Managers/ Card controllers should put in place proxy arrangements to support local purchasing needs and ensure reviewing and approving responsibilities for ePC can continue uninterrupted during periods of leave or absence.

7.10 Alternative arrangements for **purchasing**: Identify an alternative existing card holder who can make purchases on behalf of the primary card holder and has access to assign the appropriate accounting information, for example, cost centre etc. to the primary card holder's budget. If a card holder wishes to makes a transaction on behalf of another cardholder in another Directorate, they should contact ePC administration.

7.11 Proxy arrangements for **review:** A proxy can be set up to undertake a card holder's responsibilities **to review transaction activity** during their absence. There can be more than one proxy assigned to each card. A proxy can be assigned to different card holders.

7.12 Alternative arrangements for **approval**: Additional card approvers and card controllers can be assigned to approve transaction activity on behalf of another approver or controller in their absence. This ensures that the full card hierarchy are able to meet approver and controller responsibilities in a timely manner.

7.13 **There can be more than one approver but only one controller assigned to each card holder**, provided that this does not compromise the hierarchy needs of a card.

7.14 To set up proxy arrangements, a request should be made from the relevant **card controller** and sent via iFIX. If they do not have access to iFIX they should make a request from their business email account to the ePC Team. A user guide for proxy arrangements is available here.

Review and approval timescales and responsibilities
7.15 All transaction activity undertaken using the ePC is recorded on SDoL. This should be accessible to card users approximately 48 hours after a purchase has been made. SDoL should be accessible from any device with an internet

connection, including tablets and smart phones (*Blackberry* is the only exception).

7.16 Rather than waiting until month end, it is **best practice** for the card holder to review each transaction for accuracy **within 5 working days** of appearing on SDoL or as soon as practicable.

7.17 Rather than waiting until month end, following review of a transaction, it is **best practice** for the card holder to notify the nominated card approver **within 7 working days** of the transaction appearing on SDoL or as soon as practicable (using the notification facility on SDoL).

7.18 Rather than waiting until month end, it is **best practice** for the card approver to review and approve the description, financial information and, where appropriate, competitive quotes attached for the transaction on SDoL **within 10 working days** of the transaction appearing on SDoL. Card approvers are required to tick the 'approved' box on SDoL.

7.19 **Card controllers** should ensure that the purchase, review and approval processes are correctly undertaken in line with ePC policy.

7.20 To support a monthly review process and enable recharging of costs to business areas, all reviewing and approving of transactions **must be completed by the end of the second working day of the following month**. This is the cut-off point for transaction review and approval and transactions cannot be amended after this date. Failure to do so may result in transactions being allocated to the default accounting details for each cardholder.

7.21 Repeated failure to complete review and approval responsibilities will result in escalation to **card controller** and potential card suspension.

7.22 The reporting period for transactions is formally set from the 26th of the month to the 25th of the following month (see diagram at Annex 3). This is a set accounting period.

7.23 Transactions made after the 23rd of each month are likely to be charged against the next financial month. This is because transactions may not appear on the SDoL in time for the cut-off period.

7.24 This is particularly important at the close of any financial year. Upon approval, payment is uploaded to SEAS (the SG accounting system) and recharged (or invoiced to partners not on SEAS, the core SG accounting system) to the relevant business area's budget on the fifth working day of each month.

7.25 Where discrepancies arise (and the matter has subsequently been resolved with the supplier concerned), a member of the card hierarchy should check the

next expenditure period to ensure the appropriate correction appears against the relevant SDoL account, to be accurately reflected in the relevant card holder's budget.

7.26 It is the responsibility of card holders, approvers and controllers to inform the ePC Team in good time of any changes in circumstances.

Budget Centre Liaison Officers and Business Managers
7.27 SDoL is a useful source of management information on expenditure incurred by the cards in use in their area. Business areas can apply for their budget centre liaison officer (BCLO) or business manager (BM) to have access to SDoL to download reports to assist with spend reconciliation. Requests should be made to the ePC Team. Specific guidance for BCLO's and BM's is available here.

8.   Escalation

8.1   In addition to review of single transactions as per this policy, a **card controller** must identify a member of their card hierarchy to undertake a monthly review of all their card activity on SDoL, which must be completed by the second working day of every month, for the previous reporting period (which takes place between the 26th of month to the 25th of the following month).

8.2   The ePC Team monitor card usage to ensure that policy is met. If monthly cardholder review and approval responsibilities have not been undertaken in accordance with policy and audit requirements, an escalation process begins, which can result in suspension of card usage or cancellation.

Suspension and Cancellation
8.3   Suspension or cancellation of card usage is a last resort and the ePC Team actively engage business areas that have failed to undertake their responsibilities to review and approve transactions at the end of each reporting period.

8.4   Failure by a cardholder and/or card approver to complete satisfactory checks for three reporting periods in a row will lead to card suspension.

8.5   The full card hierarchy should be aware that suspension may impede their purchasing activity and will require the intervention of a Director, Deputy Director, Chief Executive or equivalent to unlock the suspension; and this will only be on provision of assurance that local arrangements have been made sufficiently robust to avoid any further occurrence on the card(s) concerned.

8.6   If a suspension is not resolved within a month then the card will be cancelled.

8.7   If arrangements are not put in place as agreed following the lifting of a

previous suspension this will lead to automatic cancellation of the card in question.

8.8   A card which has been cancelled will need to be reapplied for. This will be subject to assurances from the relevant Director, Deputy Director, Chief Executive or equivalent that improved behaviours will be adopted.

8.9   The ePC Team reserve the right to consider each case on its individual merits, taking into account the circumstances that have led to any suspension(s) and/or cancellation. This is likely to involve seeking advice from Internal Audit prior to any decision being taken.

Dormant cards and hierarchy checks
8.10 The ePC Team publish an updated hierarchy list fortnightly on Saltire. The ePC Team undertake a review of all cards bi-annually, which includes a check for dormant cards - those that have been unused for a period of time, to see whether these are still needed; and to ensure that the financial information and hierarchy for the card(s) in question remains accurate and up-to-date.

8.11 The full card hierarchy should not wait for checks to be undertaken, and should inform the ePC Team of changes in circumstances. This is particularly important where any member of the card hierarchy leaves the SG/partner organisation.

9.   ePC support

Lost, stolen, cloned or damaged cards
9.1   The card holder, card controller or business manager must report a lost, stolen, cloned or damaged card immediately to RBS on the (24 hour) hotline:
- UK: 0370 6000 459
- Overseas: +44 1268 500 813
- Minicom users: 0370 154 1192 / +44 370 154 1192

9.2   Card users should keep a record of these numbers to hand, particularly where the card is being used outside of the office.

User guides & Troubleshooting
9.3   There are separate user guides for card holders, card approvers and card controllers, with practical advice on using SDoL, including reviewing and approving transaction activity. Full guidance on using ePC is available electronic-purchasing-cards-guide-for-public-bodies.

9.4   If someone in the card hierarchy encounters difficulties using SDoL, the ePC Team can provide remote access support or be contacted through the mailbox or by telephone. Remote access support may not be available for partners. If so

contact ePC Team through the mailbox or by telephone.

New application and card cancellation
9.5   Further information on creating a new application, including the ePC application form is available from the ePC Team.

9.6   A member of the card hierarchy must contact the ePC Team if a card is no longer required, or if the cardholder moves or leaves their role, and confirm whether the card is still required (and request a new user). The ePC Team run monthly checks to identify 'Movers and Leavers', which can identify staff no longer employed (within SG core only). Non SG-core partners are to notify the ePC Team of any 'Movers and Leavers' immediately after the cardholder has left.

9.7   If a card holder leaves their role (moves or leaves) or no longer needs a card their card should be destroyed. The ePC Team will request a completed card cancellation form from the **card controller**. It is an audit requirement to retain copies of all card holder details for 6 years before the details can be removed. Card holder information is deleted from eRDM (card information and financial information sheet), SDoL and the ePC Mailbox. Transactions made will still be accessible to download on reports, with the financial codes. For card cancellation and other forms please visit Electronic purchasing cards (ePC): guide for public bodies - gov.scot (www.gov.scot)

Service standards
9.8   The ePC Team will seek to respond to all general enquiries within 24 working hours. Find out all our other service standards .

10. GDPR

10.1 In accordance with UKGDPR, we recommend that when providing information for the SDoL system that you provide your work address, email and phone number.

10.2 In exceptional circumstances, and where there is no alternative, you may be asked to provide personal details to receive a card. Please only send that information to iFIX or ePC mailbox. (For example, Covid, where you are unable to access the office to receive your card and your home address is required to have your card sent there. This allows RBS to send you your card to your home address, they do not use the information for any other purpose).

10.3 The ePC mailbox is restricted to a small number of staff. On receipt of personal information to be uploaded to (SDoL), the email is deleted once the information has been uploaded to your profile on the system.

10.4 SDoL is password protected. You can see what details are being held about

you on the 'account maintenance' section of the system. Only card holders and administrators can view this data, your card approvers and card controllers will not be able to access this data.

10.5 Applications are saved to eRDM and are kept for as long as is set out on the agreed SG retention policy and any applications sent through iFIX will also be stored for a maximum of 3 years as per ITECs data retention policy.

10.6 On receipt of a card cancellation form the application and **financial information form is deleted from ePC eRDM folders but will remain as per 10.5 above.**

10.7 RBS retention policy is to keep electronic applications for 7 years.

11. Non SG-core Partners using the ePC

- Accountant in Bankruptcy
- *Care Inspectorate**
- Community Justice Scotland
- Disclosure Scotland
- Education Scotland
- Ferguson Marine
- Food Standards Scotland
- Mental Welfare Commission for Scotland
- National Records of Scotland
- *Office of the Scottish Charity Regulator**
- Revenue Scotland
- Scottish Courts and Tribunals Service
- Scottish Fiscal Commission
- Scottish Forestry
- Scottish Housing Regulator
- Scottish Land Commission
- Scottish Law Commission
- Scottish Public Pension Agency
- Social Security Scotland
- Student Awards Agency for Scotland
- Transport Scotland

*These partners only use our embedded card arrangements