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[Council Name]

CREDIT CARD POLICY

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1 Policy Statement

1.1 Scope

Corporate credit cards are recognised as an efficient and flexible method of paying for goods and services in the public sector. They offer a convenient and highly traceable payment option, particularly for low value, day-to-day transactions, and can substantially improve purchasing efficiency by reducing administrative costs.

However, any transaction method holds the potential for misuse and the convenience and flexibility of credit cards can be a vulnerability. Therefore, sound policies and protocols for use and control must be established to take advantage of the improved purchasing efficiency while minimising the opportunity and impact of misuse of funds.

The policy is intended to apply to credit cards, as well as any other similar type of corporate or organisational purchasing card. In this policy, the term “credit card” is used to refer to any purchasing card, including credit, debit, EFTPOS and similar bank cards issued by Council and used for purchasing on behalf of Council. The key features of an account to which this policy applies are:

- (1) Purchasing responsibility on the account holder; and
- (2) A bank card for making purchases utilising Council finances; and
- (3) A periodic transaction statement cycle.

1.2 Purpose

The purpose of this policy is to provide guidance on how Council corporate credit cards are to be allocated, used and administered to ensure that they assist in efficient delivery of local government services while minimising the potential for misuse and fraud.

1.3 Purchasing Principles

[Guidance on this section is provided at Appendix A – Guidelines for Using this Document]

Cardholders must conform to sound principles of purchasing when using a Council credit card. These principles are detailed in Council’s **Purchasing Policy**.

1.4 Preferred Purchasing Methods

In using a Council credit card, Cardholders must consider the alternative purchasing methods available, such as purchase orders and purchase contracts.

Credit cards are appropriate for purchasing in the following typical situations:

- (1) Smaller purchase amounts, typically below **[\$1,000]**;
- (2) Invoices for approved goods or services requiring immediate or out-of-cycle payment, when payment has been authorised;
- (3) Where purchase orders:
 - (a) are impossible or unworkable (such as internet purchases of approved goods or services); or
 - (b) would take too long, unreasonably impact operational efficiency or result in missed opportunity, for example, if a PO would incur significant and unreasonable additional costs (either to Council or the supplier) relative to the cost of the goods or services being procured;
- (4) Where payment by credit card has been formally authorised, such as emergency situations; or

- (5) For purchases that cannot be made in the office, such as work-related travel expenses generated while traveling, or field work expenses requiring payment in the field.

Purchase orders or purchase contracts are preferred in the following typical situations:

- (1) For invoices not requiring urgent or immediate payment, such as invoices with a future due date;
- (2) Larger purchase amounts, typically of [\$1,000] or more; or
- (3) Purchases requiring agreement between parties on terms (of service, engagement or sale).

Cardholders operate with some discretion, but must justify their purchasing decisions, including the purchasing method chosen. Seek guidance or written instruction from your General Manager or financial executives if you are in doubt.

1.5 Related Policies – Essential Reading

Understanding and complying with this policy relies on understanding and complying with several other related Council policies, including:

- [Purchasing Policy];
- [Travel Expenses Policy];
- [Entertainment Expenses Policy]; and
- [Gifts Policy].

All Council purchasing, including with a Council credit card, must be undertaken in compliance with these related policies.

1.6 Policy Review and Update Cycle

This policy is to be reviewed every two years. Credit card allocation and credit limits are to be reviewed at the same time as the policy review, as well as those time specified in section 2.4.

2 Control of Credit Cards – For Authorisers

2.1 Risk Management Strategy

Each active credit card represents a risk of accidental or intentional misuse of public funds and each credit limit amount is the extent of that risk. To minimise risks associated with credit cards, Council must:

- (1) Allocate credit cards according to an organisation-wide strategy, and avoid allocating on an ad hoc or individual basis; and
- (2) Only issue cards to organisational roles where the operational benefits of efficient purchasing outweigh the increase in risk; and
- (3) Maintain control on the total number of credit cards issued and their combined purchasing potential (or credit limit) at any one time; and
- (4) Control the credit available on each card to an appropriate amount required to facilitate efficient purchasing for each role, considering the alternative payment options available; and
- (5) Ensure Cardholders and Authorisers adhere to the procedures and responsibilities set out by the policy by placing the onus of evidence for each purchase upon the Cardholder.

2.2 Authorisers

Authorisers have a key role in the control of credit cards, managing purchasing risk and maintaining compliance with this policy. Authorisers:

- (1) May authorise or decline the issuing of credit cards to a Cardholder;
- (2) May authorise or decline applications for the top-up of funds to monthly credit limits;
- (3) May authorise or decline discretionary transactions, such as entertainment or gifts in accordance with this policy;
- (4) May direct a Cardholder to reimburse Council for transactions deemed not to be in accordance with this policy;
- (5) May or may not be allocated a credit card; and
- (6) If they are allocated a credit card, **may not** authorise their own purchases, top-ups, or issuing their own credit card.

The following roles are Authorisers for the purpose of this policy:

- General Manager
- [e.g. Chief Financial Officer or equivalent financial management executive]
- [e.g. Deputy General Manager]
- [Insert additional roles here, but limit to executive/senior management roles. Each council should maintain control of the number of Authorisers, with a suggested maximum of 6-8. Authorisers should include, as a minimum, the General Manager and a financial management executive, such as the Chief Financial Officer]

2.3 Allocation and Issue of Credit Cards and Credit Limits

[Guidance on this section is provided at Appendix A – Guidelines for Using this Document]

Credit cards are allocated and issued according to the rules in the following sections.

2.3.1 Allocating Credit Cards

- (1) **Schedule 1 – Allocation of Credit Cards and Credit Limits** lists the roles that, at the absolute discretion of the Authorisers, may potentially be issued with a credit card and the maximum credit limit for each role.

- (2) The General Manager and [Chief Financial Officer or equivalent financial management executive] must authorise the allocation table.
- (3) Council credit cards are allocated to people in roles that require them. Credit cards may not be applied for. Contact your supervisor if you believe your role requires a credit card or a different credit limit. Your supervisor may choose whether or not to request a review of **Table 1. Credit Card Allocation Table** to include your role or change the credit limit available to your role.
- (4) A credit card will not be allocated to Councillors and Aldermen.
- (5) A credit card may be issued to the Mayor if the operational benefits to Council of efficient purchasing sufficiently outweigh the administrative cost of managing an additional card.

2.3.2 Issuing Credit Cards

- (1) The issue of each credit card must be authorised by an Authoriser and recorded.
- (2) An Authoriser cannot authorise the issue of their own credit card.
- (3) A person in a role that is allocated a credit card is not obliged to hold one.

2.3.3 The General Manager's Credit Card

- (1) The General Manager is allocated a card, if they choose to hold one.
- (2) The credit limit for the General Manager is determined by Council approval, including subsequent adjustments.
- (3) All statement reconciliations and credit limit top-ups for the General Manager's credit card are reviewed by the Mayor (who is not an Authoriser) and authorised by the Chief Financial Officer [or equivalent financial management executive] who is an Authoriser.

2.3.4 Setting Limits and Controls on Credit Cards

- (1) The maximum number of cards that Council will allow to be active at any one time is [to be set according to Council needs and acceptable risk; e.g. ten (10) credit cards – see guidance at **Appendix A – Guidelines for Using this Document**].
- (2) The maximum total credit limit of all cards is to be no more than [to be set according to needs, acceptable risk and budget requirements; e.g. \$30,000 cards – see guidance at **Appendix A – Guidelines for Using this Document**].
- (3) Monthly credit limits will be set to the lowest amount required by the Cardholder to conveniently execute their role, considering budget constraints, the role of top-ups, and the alternative payment methods available.
- (4) Limits on individual transactions may be set.

2.4 Review of Credit Card Allocation and Credit Limits

The allocation of each credit card and their credit limits detailed in **Schedule 1 – Allocation of Credit Cards and Credit Limits** is to be set according to operational requirements and authorised by the General Manager and Chief Financial Officer. Only the General Manager's credit limit requires Council approval; all other roles and limits are set according to Council operational requirements, as determined by the General Manager and Chief Financial Officer.

Appendix A may be reviewed and updated at any time as needed. Additionally, **Table 1. Credit Card Allocation Table** will be periodically reviewed every two years, as a minimum, in conjunction with the policy update cycle. The aim of each review is to ensure that credit card allocation and limits are facilitating efficient purchasing and delivery of Council's services while effectively managing purchasing risk. Unnecessary or insufficiently justified cards should be withdrawn and destroyed. Credit limits should be adjusted to the lowest monthly amount needed to facilitate efficient purchasing, as evidenced

by purchasing history and adherence to this policy. [Top-ups to monthly credit limits are preferred over increasing credit limits – see **Appendix A – Guidelines for Using this Document**].

In addition to the periodic review, **Table 1. Credit Card Allocation Table** is recommended to be reviewed if:

- (1) Requests are received to add or remove roles from the Credit Card Allocation Table, or alter individual credit limits;
- (2) Proposed changes to the Credit Card Allocation Table require changes to the maximum number of credit cards or the maximum total credit limit;
- (3) A Cardholder terminates employment or returns their card;
- (4) A card is lost or stolen or the subject of fraud or identity theft;
- (5) A significant breach of the policy (under section **2.6**) occurs; or
- (6) Significant reorganisation of Council roles is undertaken.

Where the operational benefits to Council of a role holding a credit card no longer outweigh the increase in risk of the extra card, the credit card should be returned and cancelled.

- The last review of credit cards and limits was: [insert date]
- The next review of credit cards and limit is: [insert date two years from above; for administrative convenience, card review date is recommended to coincide with policy review date]

2.5 Top-Ups to Monthly Credit – Deciding Applications

A Cardholder may apply for a top-up of funds to the monthly credit. Top-up applications are decided according to the following procedure:

- (1) A top-up requires the following approval:
 - (a) An Authoriser, or any person, cannot authorise top-ups for their own credit card.
 - (b) Top-ups of the General Manager's credit card account are always reviewed by the Mayor (who is not an Authoriser) and authorised by the Chief Financial Officer [or equivalent financial management executive] who is an Authoriser.
 - (c) Top ups of the Chief Financial Officer's [or equivalent financial management executive] credit card are authorised by the General Manager and another Authoriser.
 - (d) Top ups of all other Cardholders are authorised by the [Chief Financial Officer or General Manager] and one other Authoriser [OPTIONAL – it is recommended that councils have a specific role, involved in financial management, who is always an Authoriser for all top-up applications].
- (2) Authorisers review the Cardholder's purchasing and top-up history for adherence to this policy and justification of purchases.
- (3) For any given month, the total top-up amount for an account should generally not exceed 50% of the monthly credit limit.

2.6 Breach of Policy or Misuse

Any breaches of this policy by any Cardholder, Authoriser, staff or elected member, depending on the nature and extent of the breach, may result in:

- (1) Counselling and retraining in the policy and requirements;
- (2) Reimbursement of costs;
- (3) Cancellation of card;
- (4) Disciplinary action in accordance with Councils' **Disciplinary Policy**; or
- (5) Referral to police or civil proceedings.

If you become aware of policy breaches or misuse, report them immediately to an Authoriser. Policy breaches or misuse should also be reported to Council and credit card allocation should be reviewed.

3 Statement Reconciliation and Acquittal Process – Cardholders and Authorisers

The purpose of the Statement Reconciliation and Acquittal Process is to ensure that:

- Cardholders justify and prove every purchasing decision to Council; and
- Council is able to justify and validate its endorsement and validation of Cardholders' purchasing decisions to auditors, investigators and the public.

On receipt of the account transaction statement each month, the statement will be reconciled according to the following process:

- (1) The Cardholder must collate all purchase evidence (including tax invoices with purchase purpose or signed purchase statement) with all written approvals for discretionary purchases or top-ups and provide them to a Council financial officer who is delegated to reconcile the account statement.
- (2) A delegated Council financial officer will:
 - (a) Reconcile transactions individually against the supporting documentation and the requirements of this policy; and
 - (b) Question with the Cardholder any transactions:
 - (i) without supporting documentation;
 - (ii) that may be in conflict with this policy;
 - (iii) that appear suspicious, unauthorised, excessive or of unknown purpose.
 - (c) If there are any outstanding transactions that cannot be adequately explained or reconciled with this policy, the officer must report these to the Chief Financial Officer [or equivalent financial management executive] for further investigation and appropriate action.
- (3) Any breaches of this policy will be dealt with according to risk and severity of the breach in accordance with section **2.6 Breach of Policy or Misuse**.
- (4) If all transactions are supported by adequate documentation and purchases appear to be in accordance with this policy with no suspicious activity:
 - (a) The cardholder will sign the account statement to confirm the purchases; and
 - (b) For the General Manager's credit card, the Mayor will review the statement and sign to confirm purchases are in accordance with this policy; and
 - (c) The [Chief Financial Officer or equivalent financial management executive or delegated financial officer] signs the statement to approve for payment.
- (5) Full statement reconciliation, acquittal and approval for payment must be completed before payment is due or within four (4) weeks of receiving the statement.
- (6) Direct debt or similar automatic payment methods are not to be used for payment of credit cards as they can bypass the statement reconciliation and acquittal process.

4 Use of Credit Cards – For Cardholders

4.1 General Use

4.1.1 Cardholder Responsibility and Liability

As a Cardholder, you are responsible for the safe custody and security of the card and account and liable for any misuse and associated costs. You are responsible for resolving use and transaction disputes and ensuring that use of the card is ethical and strictly in accordance with this policy.

Credit cards are provided strictly for business-related purchasing only. Cardholders must be able to justify and prove their purchasing decisions to Council in a manner that allows Council to be able to justify and validate their endorsement of purchasing decisions to auditors, investigators, and the public. Always follow this policy and seek guidance from an Authoriser if in doubt.

Cardholders must comply with any terms and conditions of use provided by the card issuer and should follow the guidelines and recommendations of the issuing institution.

4.1.2 Non-Cardholder Use

Only the designated Cardholder may use the credit card. You must not let any other person use your credit card or account or record or share your credit card number, including other Council staff or elected members.

Where for an approved purchase in compliance with this policy, you may use your credit card to purchase work-related items on behalf of another Council staff or elected member, provided you are satisfied the expense is appropriate and approved in accordance with this policy. If you choose to do so, the purchase must always be made, documented and justified by the Cardholder in accordance with this policy.

4.1.3 Receipts and Documentation for Every Purchase

You must obtain a valid tax invoice for all credit card purchases and note the purpose of the purchase.

A valid tax invoice must provide sufficient information to demonstrate that the document is intended to be a tax invoice and include the following¹:

- (1) The seller's identity;
- (2) The seller's Australian Business Number (ABN);
- (3) The date the invoice was issued;
- (4) A brief description of the items sold, including the quantity (if applicable) and the price;
- (5) The GST (goods and services tax) amount payable (if any) – this can be shown separately or, if the GST amount is exactly one-eleventh of the total price, as a statement such as 'Total price includes GST'; and
- (6) Purchases over \$1000 must also show the buyer's identity or ABN (in addition to the seller's details).

You should make every attempt to obtain valid original documents in support of transactions. Council cannot claim the GST credit for purchases over \$75 without a valid tax invoice², so it is always important your purchases have original documentation. Contact vendors for original tax invoices if necessary.

In the absence of a valid tax invoice or original receipt, the you must provide sufficient information regarding the transaction to satisfy an Authoriser that the purchase is a valid work-related purchase that

¹ ATO tax invoice requirements: <https://www.ato.gov.au/Business/GST/Issuing-tax-invoices/>

² See *A New Tax System (Goods and Services Tax) Regulations 1999*:
https://www.legislation.gov.au/Details/F2011C00417/Html/Text#_Toc297551530

complies with this policy. The supporting information should include details of the transaction purpose, date, time, amount, vendor name and ABN, and your signature.

If you make a transaction of over [e.g. \$150] and fail to retain a valid tax invoice for it, you must complete and sign a statutory declaration³ that includes all the required supporting information to justify the purchase, including the transaction purpose, date, time, amount, vendor name and ABN.

Cardholders are liable for the cost of transactions that cannot be verified to be in compliance with this policy. Repeated purchases without original supporting documentation (valid tax invoice), requiring the Cardholder's explanation, or a statutory declaration are a purchasing risk to Council and may result in a credit card being revoked or disciplinary action in accordance with **2.6 Breach of Policy or Misuse**.

4.1.4 Applying for a Monthly Credit Top-Up (Cardholders)

A Cardholder may apply for a top-up to the monthly credit. An application can be made as a written request to an Authoriser, detailing the following:

- (1) The top-up amount requested (top-ups, if approved, will usually not be greater than 50% of the monthly credit limit);
- (2) The account balance and monthly credit limit;
- (3) Reasons for exceeding the monthly limit; and
- (4) Forthcoming purchases expected and amounts to justify the need for a top-up.

4.1.5 Lost, Stolen or Damaged Cards

If your Council credit card is lost or stolen, you must immediately contact the issuing institution to report the lost or stolen card. Follow the advice of the institution and then advise an Authoriser at the earliest opportunity.

Damaged cards can be reported to Council's financial management team for a replacement card to be arranged.

4.1.6 Return of Cards

Return your Council credit card immediately to your manager if you:

- (1) Are ceasing or terminating employment;
- (2) Moving to a role that is not assigned a credit card;
- (3) Taking extended leave from your role for [6] or more months, or otherwise where you feel retaining your card is an unnecessary risk; or
- (4) No longer require, or do not wish to hold, a credit card.

Credit cards should generally be cancelled and destroyed in these circumstances. If employees are returning from leave of [9] months or less, cards may be held securely by Council, at Council's discretion.

[Councils should include the return of credit cards in an employee exit checklist. Councils should consider initiating a review of the credit card allocation table as a whole each time a Cardholder returns a card.]

³ Statutory declaration forms are available from the Department of Justice:
http://www.justice.tas.gov.au/forms/statutory_declarations

4.2 Permitted Transactions

The following types of transactions are permitted and purchases may generally be made with a Council credit card without written approval from Authorisers.

Transactions for expenses that are demonstrably approved and budgeted for, such as approved projects, approved entertainment or approved travel, may be made without additional approval from Authorisers. You must be able to demonstrate purchases you make are approved and in accordance with this policy, if queried.

[Councils may wish to specify here the process by which expenses are considered to be approved.]

4.2.1 Travel Expenses

[Guidance on this section is provided at **Appendix A – Guidelines for Using this Document**]

Travel expenses are expenses incurred in the course of authorised work-related travel. They include accommodation, transport, meals, and expenses incidental to travel. Credit cards are ideally suited to cater for expenses incurred while travelling.

Travel expenses should be purchased in accordance with Council's **Travel Expenses Policy**.

4.3 Discretionary Transactions Requiring Authorisation

The following types of transactions and purchases generally require written approval from one or more Authorisers and are **discretionary transactions**. Written approvals for discretionary purchases must be provided with all purchase invoices as part of the Statement Reconciliation and Acquittal Process (see Part 3).

4.3.1 Entertainment Expenses

[Guidance on this section is provided at **Appendix A – Guidelines for Using this Document**]

Entertainment means the provision of food drink or recreation – even if business discussions or transactions occur. Entertainment is typically considered a private expense and must not be purchased using a council credit card or funds without clear prior approval to do so.

Entertainment expenses are discretionary transactions and should only be purchased where approved in accordance with Council's **Entertainment Expenses Policy**.

There are a range of circumstances where entertainment expenses may be considered to be work-related and may be purchased with your Council credit card. These include travel expenses (in accordance with section 4.2.1 Travel Expenses above), to support approved overtime work, for approved Council events or social functions or within an approved entertainment expenses budget for your role. Refer to Council's **Entertainment Expenses Policy** for how to seek approval for work-related entertainment expenses.

Certain roles are delegated the discretion to incur work-related entertainment expenses as part of their roles. These roles and their **discretionary expense limits** are allocated in **Schedule 1 – Allocation of Credit Cards and Credit Limits**.

4.3.2 Gifts

Gifts are typically considered to be private expenses and must not be purchased with a Council credit card without prior approval. However, there may be limited instances where a gift using Council funds is appropriate, such as in recognition of exceptional service of a community volunteer, or as prizes for Council-sponsored community awards, and so are discretionary transactions.

Refer to Council's **Gifts Policy** for guidance and how to apply for approval to purchase a gift.

4.3.3 Fuel

Wherever available, use a fuel card to purchase fuel for work-related fuel expenses. In the event a fuel card is not available or not accepted by vendors in a location, you may use your Council credit card to purchase fuel for work-related travel, however you must provide sufficient supporting evidence that documents the trip, its length, and purpose.

4.4 Prohibited Use and Transactions

The following types of transactions and purchases are generally prohibited and must not be made on a Council credit card.

4.4.1 Cash Advances / Withdrawals

Council credit cards must not be used for cash advances or withdrawing cash.

4.4.2 Refunds

Any refunds for purchases made on a Council credit card must be refunded back to the credit card account. Refunds must not be accepted in cash.

4.4.3 Purchases of a private or personal nature

Council credit cards must not be used for purchases of a private or personal nature, even if you intend to reimburse Council. Only approved, work-related expenses in accordance with this policy may be incurred.

4.4.4 Fines

Council credit cards must not be used to pay fines of any nature. You must pay any fines that you incur.

4.4.5 Alternative Online Payment Methods and Storing Credit Card Details

Use of Council credit cards on, or linking to, alternative online payment methods and e-commerce payment systems or accounts, such as PayPal, Google Pay, Apple Pay, iTunes, or any system that records and stores credit card details, are prohibited.

Where a payment for necessary goods or services can only be made through such a payment/e-commerce system, and that system requires the storage of credit card details or linking to a credit card account (such as Uber), then the General Manager may delegate certain Cardholders to set up and manage an online account. This policy applies for the online account, as for the credit card itself:

- (1) The online account is restricted for use by the Cardholder;
- (2) The online account is for work-related purchases only, in accordance with this policy;
- (3) The online account is to be set up with the Cardholder's work email address and details and to be managed separately from any personal online payment/e-commerce accounts.

Permissions for online accounts should be centrally controlled and recorded by Council. Council credit cards must never be linked to personal online payment systems or accounts.

5 Cardholder Declaration

I have read and understood Council’s Credit Card Policy. I understand the requirements of me as a Cardholder and agree with comply with them.

In particular, I agree:

- That I understand and will follow the rules and procedures of credit card use outlined in this policy;
- That I will adhere to all related Council policies, including Council’s **Purchasing Policy, Travel Expenses Policy, Entertainment Expenses Policy, and Gifts Policy**;
- That my credit card is to be used for Council business only;
- That I must retain receipts and documentation to support all transactions made with my card;
- That I am responsible for the safekeeping and security of my card and account and liable for any misuse;
- That I will not allow any other person to use my Council credit card; and
- That disciplinary action will be taken for any breaches of the policy.

Name: _____

Position: _____

Signed: _____

Date: _____

6 Authorisation

A Council credit card is approved to be issued to the Cardholder named above, who is authorised to hold and use a Council credit card in compliance with this policy.

Authorised by:

Name: _____

Name: _____

Position: _____

Position: _____

Signed: _____

Signed: _____

Date: _____

Date: _____

Schedule 1 – Allocation of Credit Cards and Credit Limits

This Policy permits the issue of credit cards only to the Council roles and with the limits stated in **Table 1** below.

Table 1. Credit Card Allocation Table

Role/Position	Issue	Credit Limit ⁴	Transaction Limit ⁵	Discretionary Expense Limit ⁶
General Manager	1	[e.g. \$7,000]	[e.g. N/A]	[e.g. \$800]
[e.g. Deputy General Manager]	[2]	[e.g. \$3,000]	[e.g. \$2,000]	[e.g. \$500]
[e.g. Chief Financial Officer or equivalent financial management executive]	[3]	[e.g. \$3,000]	[e.g. N/A]	[e.g. N/A]
[e.g. Executive / Director]	[4]	[e.g. \$3,000]	[e.g. \$1,000]	[e.g. N/A]
[e.g. Procurement/Purchasing Officer, Fleet Manager]	[5]	[e.g. \$3,000]	[e.g. \$2,000]	[e.g. N/A]
[e.g. Mayor]	[6]	[e.g. \$3,000]	[e.g. \$800]	[e.g. \$500]
TOTAL	[6]	\$22,000		

Table 1. Credit Card Allocation Table is authorised by:

Name: _____	Name: _____
Position: General Manager	Position: Chief Financial Officer
Signed: _____	Signed: _____
Date: _____	Date: _____

⁴ **Credit Limit** means the monthly credit limit and total value of purchases that may be made in a month.

⁵ **Transaction Limit** means the maximum value for any single transaction.

⁶ **Discretionary Expense Limit** means the maximum value per occasion of work-related entertainment expenses that a role is permitted to be purchased before seeking approval from an Authoriser.

Appendix A – Guidelines for Using this Document

How to Use this Document

This document is designed to be model policy for Tasmanian Councils to use to manage credit card use and control. However, each council has its own policies and operational procedures. Some aspects of this model policy may be best suited to an existing policy, such as a Purchasing and Procurement Policy, Financial Management Policy, or Travel Expenses Policy, or require integration with existing Council policies in a customised way.

Therefore, this document has been constructed to allow tailoring to each council’s policy environment and operational needs. Please note the following formatting in constructing your Credit Card Policy:

[Small sections in square brackets and highlight] include guidance notes or are specific items for Council to decide upon. Please edit these sections considering your Council’s operations while justifying decisions to an auditor.

All highlighted sections should be edited or deleted as required for your Council. Example text is provided below in this Appendix where your Council does not have a separate policy.

Appendix A – Guidelines for Using this Document should be deleted when producing your council’s Credit Card Policy.

“Credit Card” versus “Purchasing Card” (Section 1.1)

Some Councils prefer the term “purchasing card” to credit card. There is no issue using either term and Councils should amend the policy to reflect their preferred terminology.

Guidelines for Purchasing Principles (Section 1.3)

If your council does not have a policy explicitly dealing with principles of purchasing, the following wording is provided as an example for Council to consider. As a minimum, a purchasing policy should include guidelines around ethical dealings and purchasing risks, but may include council-specific values regarding competition, and buying locally and sustainably.

Cardholders must conform to sound principles of purchasing when using a Council credit card. These principles, listed in priority order, are:

- (1) Above all else, aim for **fair, ethical and transparent dealings** at every purchase – use an open market; justify and account for each purchase; avoid or declare conflicts of interest. Understand that the convenience of a credit card is appropriate for some purchases, but not others, and at times their convenience can work against this principle.
- (2) Manage **purchasing risks** – including safety, fraud, misuse and conflicts of interest. Purchase only where there is an operational need for the goods and services for an agency acting in the public interest; spend according to budgets; justify and account for each purchase.
- (3) Seek **value for money** – make the most effective use of public funds by balancing price, quality and convenience in each purchase.
- (4) Use **effective competition** – to drive down pricing and deliver services openly and efficiently, such as comparing offers and prices, seeking multiple quotes or advertising and seeking tenders.
- (5) Consider **environmental sustainability** in purchasing decisions – including efficiency, energy use, consumption, waste, pollution and necessity of purchase.

(6) **Buy locally** – where a purchasing opportunity meets all other purchasing principles above, have a preference for buying locally-sourced goods and services to support the skills and capabilities of your community’s business and industry.

All Local Government operations must be managed in a way that focuses on the public interest and eliminates the opportunity for misuse, fraud and conflicts of interest. This procurement of goods and services and the handling of public funds is one of those instances.

Guidelines for Allocating Credit Cards and Credit Limits (Section 2.3)

Allocation of credit limits should not necessarily be based on hierarchical positions, but on purchasing values for organisational roles.

Setting the Maximum Number of Credit Cards

It is important to maintain centralised control and awareness of the number of credit cards that Council has allocated and active at any one time. Setting a maximum number of credit cards in section 2.3.4(a) provides clarity for management in controlling the number of active cards and allows for allocation and issue of cards according to a broader strategy rather than an individual, ad-hoc basis. It also provides a trigger point for review of the allocation strategy and the Credit Card Allocation Table.

To allow for additional roles to be added to the Credit Card Allocation Table, the maximum number may be set slightly higher than the total number of roles in **Table 1**.

Setting the Maximum Total Credit Limit

It is important to maintain centralised control and awareness of the total credit available, representing the purchasing risk, that Council has allocated and active at any one time. Setting a maximum total credit limit of all credit cards in section 2.3.4(b) provides clarity for management in controlling the distribution of purchasing risk and allows for a more strategic allocation of purchasing power, rather than incremental creep of the total credit limit by individual, ad-hoc allocation.

To allow for additional roles to be added to the Credit Card Allocation Table, the combined credit limit of all cards may be set slightly higher than the total credit available of active cards in **Table 1**.

Credit Limit versus Top-Ups

Councils should set credit limits with an understanding of how it intends to use top-ups to monthly credit under section (2.5). Councils may choose to either:

- (1) Prohibit top-ups and set higher credit limits to compensate; or
- (2) Set tighter credit limits and facilitate top-ups.

Option 1 is less secure and less flexible and is not recommended as it eliminates the flexibility of top-up approvals and requires a laxer credit limit. Option 2 is a superior strategy and recommended as it allows for more secure setting of credit limits and facilitates flexibility for unusual months when purchases are high by providing an approval mechanism for top-ups to credit.

Setting Limits for Individual Transactions

Setting limits for individual transactions is optional, as they restrict operational flexibility with only marginal benefits for managing purchasing risk. Credit limits are a more effective control of risk. If chosen, transaction limits may be specifically set below the monthly credit limit according to operational requirements.

Guidelines for Travel Expenses (Section 4.2.1)

If your council does not have a policy explicitly dealing with travel expenses, it is recommended to include wording similar to the following. As a minimum, a travel expenses policy should include guidelines around reasonable amounts and/or daily allowances for travel expenses as well as appropriate and inappropriate types of expenses.

Travel expenses are expenses incurred in the course of authorised work-related travel. They include accommodation, transport, meals, and expenses incidental to travel. Credit cards are ideally suited to cater for expenses incurred while travelling.

Travel expenses **must not** include:

- Any expenses for unauthorised travel, especially flights and accommodation;
- Entertainment, defined below, including alcoholic beverages;
- Expenses for any other person who is not a council employee;
- Membership subscriptions for airline clubs or loyalty programs;
- Minibar purchases, in-room movies and other similar expenses of a private nature.

Travel expenses must be reasonable and an efficient use of public funds. The Australian Taxation Office Tax Determination TD 2017/19⁷ provides guidance on 'reasonable amounts' for overnight accommodation, meals and incidental expenses for taxation purposes. Note that the ATO 'reasonable amounts' are for *taxation purposes* and are a guide only for setting reasonable amounts for your Council. This means that while travel expenses of the ATO reasonable amounts and below can be considered reasonable and justified, you must justify travel expenses in excess of these amounts or pay the excess at your personal expense.

It is recommended that you use the following guidelines when arranging your work-related travel and incurring travel expenses:

- (1) Ensure your travel is approved and budgeted for.
- (2) Have an officer experienced with applying the ATO reasonable amounts determine your travel budget or book and pay for your travel.
- (3) Travel expenses:
 - (a) below the ATO reasonable amounts are justified for authorised travel and do not need approval;
 - (b) in excess of the ATO reasonable amount must be justified by the Cardholder or the excess paid by the Cardholder personally. This means Cardholders can pay extra, at their own expense, for upgrading travel services.

- (4) Travel should be as economical and efficient as is reasonable. This means preferring cheaper modes of travel, such as economy class, where time and availability allow. It does not necessarily preclude upgraded travel services where it can be justified – for example, business class flights purchased at low price (relative to economy travel), or with reward points, or with the excess cost paid personally or, if they were only available seats for necessary travel.
- (5) If you are in doubt about any travel purchase, seek guidance or written approval.

Guidelines for Entertainment Expenses (Section 4.3.1)

If your council does not have a policy explicitly dealing with entertainment expenses, it is recommended to include wording similar to the following. As a minimum, an entertainment expenses policy should include guidelines around determining the public interest of entertainment expenses and how to apply for approval.

⁷ See ATO TD 2017/19: <https://www.ato.gov.au/law/view/document?DocID=TXD/TD201719/NAT/ATO/00001>

Entertainment means the provision of food, drink or recreation, even if business discussions or transactions occur, but excludes travel expenses, such as meals on overnight, work-related travel. Some examples of entertainment include business lunches and social functions. Entertainment is defined by the *Income Tax Assessment Act 1997*, section 32-10 – Meaning of Entertainment⁸.

Entertainment is typically considered a private expense and must not be purchased using a Council credit card or funds without approval. If you are purchasing food or drink, you are purchasing entertainment, except where for valid work-related entertainment expenses.

There are a range of circumstances where entertainment expenses may be considered to be work-related and may be purchased with your Council credit card. Such work-related entertainment expenses include travel expenses (in accordance with Council's Travel Expenses Policy), to support approved overtime work, for approved Council events or social functions or within an approved entertainment expenses budget for your role.

Entertainment may be deemed a work-related expense where the public interest of the entertainment clearly and substantially overrides the personal benefit, such as where the provision of entertainment supports a work-related, council-sponsored event or social function. Council should seek to avoid covering the entertainment expenses that would be seen to predominantly direct benefit to specific private individuals, such as contractors and private business representatives, except where incidental to a community-focused event or function.

For entertainment expenses to be approved:

- (1) Cardholders must apply in writing, justifying the expense;
- (2) Applications must be approved in writing by:

- (a) One Authoriser for entertainment purchases below [\$400]; and
- (b) Two Authorisers for entertainment purchases of [\$400] or more;

- (3) An Authoriser cannot approve their own expenses;
- (4) The written approval must be provided with transaction receipts.

Cardholders should apply for approval to use a Council credit card for entertainment expenses prior to incurring the expense. Cardholders who do not apply for approval of entertainment expenses prior to incurring the charge carry their own risk that it be considered a private and not a work-related expense and will be liable for the cost.

⁸ See the *Income Tax Assessment Act 1997*: <https://www.legislation.gov.au/Details/C2018C00056>.