

Patient Purchasing Cards

Policy Number 2.126

Policy Function Leadership and Management

Issue Date 2 December 2022

Summary This policy outlines the requirements for the operational management of Patient Purchasing Cards used to facilitate the purchase of essential personal property items on behalf of Forensic Hospital patients.

Responsible Officer Executive Director Corporate Services

Applicable Sites

- ☒ Administration Centres
- ☐ Community Sites (e.g. Court Liaison Service, Community Integration Team, etc.)
- ☐ Health Centres (Adult Correctional Centres or Police Cells)
- ☐ Health Centres (Juvenile Justice Centres)
- ☐ Long Bay Hospital
- ☒ Forensic Hospital

Previous Issue(s) Policy 2.126 (July 2018, Dec 2014, Dec 2013)

Change Summary

- PP Card transactions are limited to purchases of essential personal property items on behalf of Forensic Hospital patients.
- Allocation limits of active PP Cards, is amended from a maximum per authorised employee, to a maximum per hospital unit.
- Implementation roles and responsibilities are clarified.

HPRM Reference POLJH/2126

Authorised by Chair, Policy Steering Committee

1. Preface

This policy outlines the requirements for the operational management of Patient Purchasing Cards (PP Cards) used to facilitate the purchase of approved and essential personal property items on behalf of Forensic Hospital (FH) patients.

PP Cards, similar to a debit card, will replace cash purchases (with the exception of approved cash transactions as specified in Justice Health and Forensic Mental Health Network (Justice Health NSW) by allowing payments to be processed electronically via the VISA network wherever VISA is accepted. This includes approved internet, mail order (restricted) and telephone purchases, thereby reducing over-the-counter transactions. PP Cards may be loaded with up to \$999 value and do not provide a credit facility.

This policy aims to ensure:

- Justice Health NSW complies with legislative requirements, NSW Ministry of Health (MoH) policy directives (PD) and procedure manuals;
- Appropriate governance for the management of PP Cards is in place and adhered to;
- Operational efficiency occurs when facilitating patient purchases;
- Security of patient trust monies and safety of employees is safeguarded when facilitating patient purchases; and
- Cash transactions are restricted.

2. Policy Content

2.1 Mandatory requirements

- PP Cards must be operated in accordance with legislation, NSW MoH and Justice Health NSW policies and procedure manuals as set out in [Section 5](#) of this policy.
- Appropriate resources and processes must be in place, adhered to and reviewed as necessary in order to eliminate or minimise risks associated with the use of the PP Cards.
- Expenditure from a patient's FH trust account must be approved in accordance with Justice Health NSW policy [2.022 Delegations Authority](#).
- Other than authorised employees (as defined by [Section 4](#) of this policy), Justice Health NSW employees must not become involved in a patient's financial affairs in accordance with Justice Health NSW policy [2.010 Code of Conduct](#), unless authorised in writing by the Director of Nursing & Services, Forensic Hospital and Executive Director, Corporate Services for a specific purpose, and where the written authorisation is stored in the employee's Content Manager (CM) personnel file. Allied Health employees are not obligated to participate in the allocation or use of PP Cards.
- When an authorised employee assists a patient with their financial affairs, they must do so in accordance with legislation, NSW MoH and Justice Health NSW policies and procedure manuals as set out in [Section 5](#) of this policy.
- Employees and other third parties, not including the merchant or patient, must not benefit or gain from transactions made on behalf of FH patients including, but not limited to, seeking and/or accepting

points for any banking, or merchant loyalty reward schemes in accordance with NSW [MoH PD2022_020 NSW Health Procurement](#).

- Documents generated for the purpose of managing PP Cards and conducting transactions must be captured, managed, retained and destroyed in accordance with the *State Records Act 1998*
- Fraudulent activity, known or suspected, must be immediately reported to Justice Health NSW Chief Financial Officer or Financial Accountant and the card holder's line manager.
- Lost or stolen PP Cards or personal identification numbers (PINs) must immediately be reported to Justice Health NSW Chief Financial Officer or Financial Accountant and the card holder's line manager.
- Withdrawing cash funds from a PP Card is prohibited.

2.2 Implementation – Roles & Responsibilities

Executive Director, Corporate Services and **Director of Nursing & Services, Forensic Hospital** are responsible for:

- Ensuring Justice Health NSW has appropriate resources and control framework to eliminate or minimise risks associated with the use of PP Cards;
- Reviewing PP Card expenditure, resources and control framework as required; and
- Providing written authorisation to Finance to allocate a PP Card to non-Finance/Allied Health employees.

Chief Financial Officer is responsible for:

- Overseeing and monitoring controls for the management of PP Cards;
- Ensuring Justice Health NSW Finance staff are aware of and comply with this policy; and
- Authorising the use of alternative payment methods.

Chief Financial Officer and **Financial Accountant** are responsible for:

- Approving allocations of PP Cards to authorised employees;
- Approving submissions for loading and unloading patient funds to/from PP Cards;
- Managing *CardWiz* User profiles;
- Suspending or cancelling the active status of a PP Card where it, or the PIN, has been lost or stolen, or where suspected or known fraudulent activity has been reported; and
- Addressing any matters of fraudulent or unauthorised activity and escalating where necessary.

Line Manager (of Authorised Employee) is responsible for:

- Notifying Finance/ Patient Accounts of employees authorised to assist FH patients with their financial affairs; and
- Addressing any matters of fraudulent or unauthorised activity and escalating where necessary.

Card Holder (Authorised Employee) is responsible for:

- Complying at all times with this policy;
- Ensuring all forms are completed and carried out in accordance with [Section 3](#) of this policy;
- Purchasing approved patient property items in accordance with FH procedural requirements for the purchase, security clearance and storage of patient property items

- Ensuring the provision of secure storage for purchased patient property items temporarily in their care;
- Safe keeping of PP Card and PIN are to be secured in the same way as a personal credit card in order to prevent fraudulent use by unauthorised persons.
- Signing their PP Card immediately on receiving it and before using it;
- Reporting lost and stolen cards or PINs immediately to Justice Health NSW Chief Financial Officer or Financial Accountant and their line manager; and
- Reporting fraudulent activity, known or suspected, immediately to Justice Health NSW Chief Financial Officer or Financial Accountant and their line manager.

Patient Fees & Trust Accounting Officer and **CardWiz User** are responsible for:

- Providing the card holder with a copy of this policy and Personal Identification Number (PIN)
- Providing the card holder with a copy of *My Account User Instructions*;
- Complying with procedural content as set out in [Section 3](#) of this policy and related *Finance-Patient Accounts work instructions*;
- Ensuring that written authorisation for employees/staff to act as Authorised Employees is recorded in the employee's CM personnel file;
- Reporting lost and stolen cards or PINs immediately to Justice Health NSW Chief Financial Officer or Financial Accountant; and
- Reporting fraudulent activity, known or suspected, immediately to Justice Health NSW Chief Financial Officer or Financial Accountant.

3. Procedures

3.1 General

- A flow chart outlining key procedures is provided at Appendix A.
- Justice Health NSW Chief Financial Officer and Financial Accountant should be registered with *Westpac Banking Corporation* as an Administrator for Secure Access/IT and Secure Reports online programs.
- Justice Health NSW Chief Financial Officer and Financial Accountant should be registered as a Manager for the *CardWiz* online program.
- Patient Fees & Trust Accounting Officer (PF&TAO) and at least one other Justice Health NSW Finance employee should be registered with *Westpac Banking Corporation* as an Administrator for the Secure Reports online program.
- The PF&TAO and at least one other Justice Health NSW Finance employee should be registered as a User for the *CardWiz* online program.
- Patients must not be provided with a credit facility.
- Withdrawing cash funds from a PP Card is prohibited.
- PP Cards must not be used to purchase items prohibited in the FH.
- PP Cards must not be used for any unlawful purpose, including the purchase of goods or services prohibited by the laws of Australia.

- PP Cards must only be used to purchase approved and essential personal property items for inpatients of the FH. Funds held for a discharged patient must be promptly returned to the patient's FH trust account and related documents returned to Patient Accounts.
- PP Cards are to be used in conjunction with approved policies and procedural requirements for patient purchasing and property in the FH, and patient trust accounts.
- PP Cards should be used as the preferred payment method where VISA facilities are available. Other payment methods may be used upon approval by the Chief Financial Officer or Executive Director, Governance and Commercial Services.
- Provisions must be made by the PF&TAO/*CardWiz* or card holder for the secure storage of active and non-active PP Cards when not in use.

3.2 Administration of PP Cards

3.2.1 Allocating a PP Card to an Authorised Employee

- Only one (1) PP Card per hospital unit may be activated at any one time.
- PP Cards may be allocated to Authorised Employees as defined by [Section 4](#) of this policy. The employee to whom the card is, or intended to be, allocated to will hereafter be referred to as the card holder.
- The PF&TAO/*CardWiz* User must provide the card holder with this policy prior to allocating the PP card.
- The PF&TAO/*CardWiz* User should refer to the *CardWiz User Instructions* for instructions on allocating a PP Card to a card holder.
- The PF&TAO/*CardWiz* User must notify the Chief Financial Officer or Financial Accountant of submissions for PP Card allocations requiring approval.
- Following approval of the PP Card allocation, the PF&TAO/*CardWiz* User must provide the card holder with their PIN.
- The card holder must immediately sign the back of the PP Card.
- The PF&TAO/*CardWiz* User must provide the card holder with the *My Account User Instructions* for the use of the online program.

3.2.2 Loading Funds onto a PP Card

- Following the approval of a patient's request for additional property items, the card holder must provide a completed FIN453 *Essential Property Items* form. Expenditure from a patient's FH trust account must be approved in accordance with Justice Health NSW policy [2.022 Delegations Authority](#). Incomplete forms will not be processed by Finance-Patient Accounts.
- PF&TAO/*CardWiz* User must confirm availability of funds in a patient's FH trust account prior to submitting a request for loading of funds to a PP Card via the *CardWiz* online program. Funds provided to a card holder must not exceed the value of patient's FH trust account.
- The structure of a PP Card ensures the maximum value available at any time will not exceed \$999.00.
- The PF&TAO/*CardWiz* User should refer to the *CardWiz User Instructions* for instructions on loading funds to a PP Card and submitting the request for approval.

- The PF&TAO/*CardWiz* User must notify the Chief Financial Officer or Financial Accountant of submissions for PP Card fund transfers requiring approval.
- The Chief Financial Officer or Financial Accountant may choose to approve or decline requests for fund transfers at their discretion.
- The PF&TAO/*CardWiz* User must record approved transfers for each patient in the *PP Card Transactions* register for the current financial year and allocate a reference number from the register.
- The PF&TAO/*CardWiz* User must immediately update the patient's FH trust account with the withdrawn value and register the reference number.

3.2.3 Issuing PP Card to a Card Holder

- The card holder must sign for the receipt of their PP Card and patient funds using the FIN453 *Essential Property Items* form. By signing, the card holder accepts responsibility for the safe keeping of the PP Card and funds, and to carry out all transactions in accordance with this policy.

3.2.4 Purchase, Security & Storage of Patient Property Items

- Card holders must comply with FH procedural requirements for the purchase, security clearance and storage of patient property items.
- Foreign currency transactions will incur a 1.5% fee charged by VISA which is payable by the patient. This rate is subject to change.

3.2.5 Finalising Transactions

- The card holder is responsible for ensuring that sections 6-7 of the FIN453 *Essential Property Items* form have been completed.
- Original purchase receipts must be sticky taped to a separate sheet and attached to FIN453 *Essential Property Items* form. Tape may dissolve the ink and care should be taken so as not to jeopardise quality of Justice Health NSW records and/or exchange or refund opportunities if required. In accordance with [Section 3.2.6](#) original documentation should be recorded in CM to ensure a legible copy of the receipts is retained.
- The card holder must make all attempts to return the original purchase receipts, FIN453 *Essential Property Items* form and PP Card to the PF&TAO by the end of each calendar month.
- The PF&TAO must reconcile original receipts against PP Card transactions and the remaining card balance. Accounts that do not reconcile should be addressed in the first instance with the card holder. Matters that remain unresolved must be escalated to the Chief Financial Officer and Financial Accountant.
- The PF&TAO must immediately report suspicious transactions to the Chief Financial Officer and Financial Accountant. Suspicious transactions include transactions where a card holder has obtained loyalty/reward points against a purchase.
- When patient funds are no longer required and the PP Card has been returned to Finance-Patient Accounts, the balance of funds issued for that patient must be transferred to the respective patient's FH trust account as soon as possible. The PF&TAO/*CardWiz* User should refer to the *CardWiz User Instructions* for instructions on unloading funds from a PP Card and submitting the request for approval.

- The PF&TAO/*CardWiz* User must update the register for *PP Card Transactions* with the values of purchases and remaining funds to be returned to the patient's trust account.
- The PF&TAO/*CardWiz* User must update the patient's FH trust account with the returned value as soon as possible once the request has been actioned by the Chief Financial Officer or Financial Accountant

3.2.6 Content Manager (CM)

- The PF&TAO/*CardWiz* User is responsible for ensuring all documentation and correspondence is recorded in CM.
- The PF&TAO/*CardWiz* User is responsible for ensuring that correspondence for a non-authorised employee to act as an Authorised Employee is recorded in CM and that Finance has security rights to view the CM record.

3.2.7 Reconciling PP Card accounts

- The PF&TAO must ensure purchase receipts and other transactions are matched to the PP Card transaction statement upon finalising any transaction for essential property items.
- The PF&TAO must reconcile monthly statement movements for all PP Card accounts at the end of each calendar month with MYOB accounts.
- The PF&TAO must record all monthly Reconciliation Reports in CM.

3.2.8 Protecting the PIN

The PIN must be used as a replacement to signature authorisations at merchant terminals. It is important to keep the PIN secure because if the PP Card is lost or stolen, knowing the PIN may assist someone else to use the card to obtain cash or goods and services.

In accordance with Justice Health NSW's agreement to comply with *Westpac Banking Corporation's Conditions of Use* document for PP Cards, the following provides for PIN security.

- Records of the PIN must be kept separate and well away from the PP Card
- To protect the PIN one must:
 - try to memorise it;
 - retain an electronic copy (with restricted access rights) of the letter notifying of the PIN and destroy the hard copy;
 - not write the PIN on the PP Card, even if it is disguised;
 - not keep a record of the PIN with or near the PP Card;
 - not tell anyone the PIN, including family members, friends, Justice Health NSW employees;
 - if the card holder selects their own PIN, not select a number or word that can be easily guessed, such as part of the data imprinted on the card, a previously selected PIN, consecutive numbers, one number repeated or numbers which form a pattern, or that can be easily associated with the card holder, such as their date of birth, telephone number, driver's licence and so forth;
 - where reasonably possible, avoid circumstances where another person can watch the PIN being entered at merchant terminals;
 - never enter the PIN in a merchant terminal that does not look genuine, has been modified, has a suspicious device attached to it or is operating in a suspicious manner;

- be ready to make a transaction or enquiry when approaching a merchant terminal;
- make sure not to leave anything behind when a transaction is completed, including leaving the PP Card unattended in or at a merchant terminal; and
- notify PF&TAO immediately if a PIN change has taken place without being requested.
- Card holders who select their own PIN, for security reasons, should endeavour to change it at regular intervals.
- Card holders who make a record of their PIN, must take reasonable steps to prevent unauthorised access to the record

3.2.9 Lost, Stolen and Damaged PP Cards and PINs

- Compliance with this policy and related policies and procedures will protect the card holder from liability for lost and stolen cards or funds.
- A card holder is responsible for the use and safety of their PP Card and PIN. Conditions for the security of the PIN and PP Card must be complied with at all times.
- If a PIN record or PP Card is lost or stolen, or it is suspected that unauthorised transactions have been made, the card holder must immediately contact the Chief Financial Officer or Financial Accountant and their line manager.
- Justice Health NSW will only replace lost or stolen cards where it is satisfied that the card has genuinely been lost or stolen.
- Upon notification of a lost or stolen PIN or PP Card, the *CardWiz* Manager must immediately suspend the card and unload the card value.
- A damaged card will only be replaced if it is returned to Finance or Finance-Patient Accounts.

3.2.10 Cancellation of PP Cards

- Justice Health NSW may cancel or suspend a PP Card at any time if:
 - the card holder does not comply with policy and procedural requirements;
 - it is believed or discovered that the card holder is not entitled to the PP Card or to the value which has been loaded on the PP Card;
 - the card holder ceases employment or their contract has concluded with Justice Health NSW; or
 - it is determined at the discretion of Justice Health NSW that the PP Card should be cancelled for another reason.
- Card inventory must be checked monthly by the PF&TAO. Any PP card which has been damaged or has expired must be destroyed once all funds have been unloaded from the card.
- Finance must notify *Westpac Banking Corporation* via *CardWiz* of any card that has been destroyed, or of cards that are cancelled or void after activation and any reason for doing so.

3.2.11 Audit and Reporting Requirements

A periodic review of PP Card expenditure, resources and control will be performed by the internal audit.

The review will consider the following:

- The current policy and work instructions
- Operational concerns or inefficiencies raised since the last review

- Changes to operational activities
- A summary of total expenditure per hospital unit and merchant
- Suitability of resources and training
- Any reported potential fraudulent activity.

4. Definitions

Authorised Employee

A Justice Health NSW employee authorised to assist a patient with their finances. Authorised Employees include: Patient Fees & Trust Accounting Officer, Finance staff, Allied Health staff and staff nominated by the Director of Nursing & Services, Forensic Hospital and Executive Director, Corporate Services for a specific purpose.

The Patient Purchasing Coordinator has been authorised to facilitate the purchase of essential personal property items on behalf of FH patients.

Card Holder

An authorised employee, including Ward Clerk and Clinical Support officer.

CardWiz

The card inventory management system and card activation system to which *CardWiz* Users will have access via a web browser.

CardWiz Manager

Nominated as Verifying Officer or Agent with *Westpac Banking Corporation*, usually the Chief Financial Officer or Financial Accountant. Managers have the responsibility of identifying card holders, approving submissions for card activation and transfer of patient funds to/from a PP Card.

CardWiz User

A Justice Health NSW Finance employee, usually the Patient Fees & Trust Accounting Officer, Account Payable Officer or Finance Support Officer. *CardWiz* Users are responsible for entering requests for patient funds into the *CardWiz* program and submitting request for funds and card activations to the *CardWiz* Manager.

Card

The prepaid debit card bearing the Visa logo which is issued to a recipient card holder.

Employee/Staff

A Justice Health NSW employee, agency employee, contractor or other third party undertaking the work of Justice Health NSW.

Essential Property Item

Is a relatively inexpensive item of necessity, such as, but not limited to, clothing, shoes and toiletries. FH *Patient Purchasing Procedures* contains a list of essential items.

Loading

Movement of patient funds from the trust account onto a PP Card.

Must

Indicates a mandatory action or requirement.

Patient Purchasing Cards

Are prepaid debit cards bearing the Visa logo and used by authorised staff in accordance with Justice Health NSW policy [2.126](#) *Patient Purchasing Cards*, to purchase certain essential goods and services on behalf of patients.

PIN

Personal Identification Number

Should

Indicates a recommended action that should be followed unless there are sound reasons for taking a different course of action.

Trust Account

Is, unless otherwise stated, an account managed and operated by Justice Health NSW Finance-Patient Accounts and made available to individual patients admitted to the FH to hold their funds in trust.

Unloading

The movement of patient funds from a PP Card to the trust account.

5. Legislation and Related Documents

Legislation	<i>Health Services Act 1997</i> <i>Mental Health Act 2007</i> <i>Mental Health (Forensic Provisions) Act 1990</i> <i>Government Sector Finance Act 2018 (GSF)</i>
Justice Health NSW Policies, Manuals and forms	<i>2.010 Code of Conduct</i> <i>2.020 Corruption Prevention and Fraud Control</i> <i>2.022 Delegations Authority</i> <i>2.124 Patient Trust Accounts</i> <i>5.135 Security Risk Management</i> <hr/> <hr/> <i>FIN453 Essential Property Items form</i>
NSW MoH Policy Directives and Manuals	<i>PD2005 054 ICAC Report: Cash Handling in Public Hospitals</i> <i>PD2015 045 Conflicts of Interest and Gifts and Benefits</i> <i>NSW Health Privacy Manual for Health Information</i> <i>PD2022 020 NSW Health Procurement</i> <hr/> <i>Accounts and Audit Determination for Public Health Organisations</i> <i>Accounting Manual for Public Health Organisations</i>

6. Appendix A – Procedure Flow Chart

