

AFP National Guideline on using the AFP corporate credit card

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1. Disclosure and compliance

This document is classified **OFFICIAL** and is intended for internal AFP use.

Disclosing any content must comply with Commonwealth law and the [AFP National Guideline on information management](#).

This instrument is part of the AFP's professional standards framework. The [AFP Commissioner's Order on professional standards \(CO2\)](#) outlines the conduct expected of AFP appointees. Inappropriate departures from the provisions of this instrument may constitute a breach of AFP professional standards and be dealt with under Part V of the [Australian Federal Police Act 1979](#) (Cth) (AFP Act).

2. Guideline authority

This guideline was issued by Chief Financial Officer using power under section 37(1) of the [AFP Act](#), as delegated by the Commissioner under section 69C of the Act.

3. Introduction

The purpose of this guideline is to control the risks associated with mismanagement or misuse of AFP resources by AFP appointees, in particular Enterprise Risk – Resourcing (E7), as documented in the [AFP Risk Profile](#). Non-compliance with the obligations conveyed in this guideline could prevent the AFP from meeting its operational objectives within budget.

This national guideline informs appointees of their obligations regarding the allocation, custody and use of AFP corporate cards (inclusive of a Diners virtual card and a MasterCard).

AFP appointees who fail to comply with this guideline and the governance instruments listed in this guideline may have their AFP corporate cards suspended and may be subject to a Professional Standards and/or an Australian Commission for Law Enforcement Integrity investigation (specifically for matters giving rise to fraud or corruption), which may result in a review of employment suitability.

4. Application, authorisations and responsibilities

4.1 Application

AFP appointees must use the AFP corporate card in accordance with this national guideline and the relevant governance instruments (see section 7. References).

The previous Commonwealth policy on payment cards, [Resource Management Guide \(RMG\) 416: Facilitating Supplier Payment Through Payment Card](#), has been merged into [RMG 417: Supplier Pay On-time or Pay Interest Policy](#).

4.2 Delegations and authorisations

All spending of AFP money requires approval. The AFP Commissioner's Financial Instructions (CFIs) [Schedules of delegations and authorisations \(Annex A\)](#) sets out the framework, which delegates certain personnel the power to approve spending within particular categories.

Generic financial delegations for general spending may be position-based or level-based and include the authority to:

- approve spending proposals up to a nominated value (GST-inclusive) within the area of financial responsibility
- enter into contracts, agreements or arrangements.

Specific categories excluded from the generic financial delegations are outlined in the [Schedules of delegations and authorisations \(Annex A\)](#).

Spending **must** only be approved where it is considered proper use, that is for the purposes of the AFP and publicly defensible.

Delegates **must** ensure that funds/budget are available prior to entering into a commitment to spend money.

Delegates **must not** approve commitments of relevant money or enter into an arrangement for their own direct benefit (self-commitment). In this circumstance approval must be obtained from another relevant delegate.

4.2.1 Transactions up to \$10,000 (GST-inclusive)

Cardholders are automatically delegated to spend on low-value, low-risk and low-scale expenses up to \$10,000 per transaction. This self-delegation is intended to allow cardholders to procure goods and services without seeking formal written pre-approval from their supervisor.

AFP appointees must ensure all transactions are value for money and are an appropriate use of public monies. Authorised cardholders accept the risk that if their supervisor does not approve the acquitted expense, it may need to be categorised as 'accidental use' and be repaid to the AFP. If in doubt, AFP appointees should obtain verbal or written approval from their supervisor prior to the purchase.

4.2.2 Transactions pre-approved by a travel requisition

Transactions that relate directly to a pre-approved travel requisition do not require additional approval if linked to the appropriate travel requisition in the AFP's travel and expense management system (Fraedom).

4.2.3 Transactions pre-approved by a spending proposal

Transactions that relate to a pre-approved spending proposal outside of the appointee's cost centre or a pre-approved spending proposal for transactions deemed as a self-commitment or a purchase greater than \$10,000 that do not relate to a purchase order must be supported by attaching the spending proposal to the transaction in Fraedom.

4.3 Responsibilities

AFP appointees must:

- be aware that they are accountable for all transactions on their AFP corporate card
- not use the card in a manner that would contravene legislative requirements or Commonwealth or AFP policy
- maintain a working knowledge of the AFP's purchasing policies, procedures and delegations
- ensure transactions are verified as correct by supporting transactions with accurate acquittal information
- ensure acquittals are completed (coded and approved) within 28 days of the statement date – the statement period ends on the 26th day of each month.

Lost, stolen or damaged AFP corporate cards

If the AFP corporate card is lost, stolen or damaged, the AFP appointee must immediately notify the credit card provider (Diners) to request a replacement card on:

- 1800 105 660 for Australia-based appointees
- (+61 3) 8643 2210 for overseas-based appointees.

5. AFP corporate card use

An AFP corporate card is used by AFP appointees who are required to undertake official travel or make official purchases using a credit card. AFP appointees must complete an application form, accept and acknowledge the declaration, have it approved by a supervisor (coordinator/superintendent level or above) within their business area and then forward the completed form to the AFP Corporate Cards team at s 47E(d) afp.gov.au for processing.

On application, AFP appointees are issued with two corporate cards, a Diners virtual card and a physical MasterCard:

- The Diners virtual card is a non-physical card linked to the cardholder's traveller profile in the QBT, AOT and Hertz travel booking systems and is only used for transactions booked using these systems.
- The MasterCard is a physical card used for business-related expenses that are less than \$10,000 (GST-inclusive) per transaction.

The AFP Corporate Cards team must maintain a national register of AFP appointees who hold AFP corporate cards.

5.1 AFP corporate card transaction limits

Unless a variation is approved by the relevant delegate, transaction limits for the AFP corporate card are:

Monthly credit limit	\$20,000
Transaction limit (SES only)	\$20,000
Transaction limit	\$10,000
Cash withdrawal limit (daily)	\$200
Cash withdrawal limit (monthly)	\$1,000

The default monthly transaction limit is determined by the Chief Financial Officer (CFO). This limit is the default limit for all transactions for each card.

To apply for a temporary or permanent increase to this limit in support of operational requirements, AFP appointees must obtain approval from their manager/commander (SES Band 1) prior to sending the application to the AFP Corporate Cards team for processing. All transaction limits will be maintained on the national register and reviewed by the CFO on a periodic basis.

5.2 Cash withdrawals

Cash withdrawals are permitted only where cards are not accepted while travelling internationally and this circumstance must be documented in the travel approval request. A travel diary must be kept and receipts are required.

For all other allowable cash withdrawals, AFP appointees must separately document a list of recipients, the amount of cash provided, the name of the approver, the purpose of the withdrawal and the basis for the calculation of the withdrawal amount. The

recipient list should also show the recipient's signature acknowledging receipt of the cash amount.

Any unused cash must be repaid as soon as possible using one of the repayment options: either via *Insight!* Repayments or direct deposit into the main AFP bank account.

5.3 Purchasing using the AFP corporate card

Pursuant to [RMG 417](#), the Commonwealth policy incorporating guidelines on the use of payment cards, AFP strongly encourages the use of the corporate card as the preferred payment method for pre-approved/non-prohibited purchases that are low-value, low-risk and low-scale up to \$10,000 (GST-inclusive) per transaction, including:

- general transport (i.e. taxis, buses, trains, tolls and parking costs for meetings separate from a travel request)
- minor stationery and office requisites if not required to be procured under Whole-of-Australian-Government (WoAG) purchasing arrangements
- minor catering for office workshops or meetings (there are additional approval requirements if considered official hospitality)
- other minor purchases (e.g. spare parts).

Purchases equal to or greater than \$10,000 (GST-inclusive) per transaction must be evidenced through contractual arrangements. If these requirements cannot be met due to urgent operational circumstances, the reasons for exceeding this limit must be formally documented and approved by the relevant pre-purchase approval delegate and maintained by the AFP appointee.

Purchases **must not** be 'split' in order to bypass the [AFP National Guideline on procurement and contracting](#) and the [CFI](#) requirements for:

- all procurements valued \$10,000 (GST-inclusive) or more to be executed via a contract
- all contracts, irrespective of value, to be registered in *Insight! Purchasing* within 7 business days of execution
- a purchase order to be raised, via a shopping cart in *Insight! Purchasing*, for purchases valued \$10,000 (GST-inclusive) or more.

5.3.1 Portable and attractive items

If the AFP corporate card is used to purchase portable and attractive items (as defined in the AFP's [Asset Management Policy](#)), the AFP appointee must complete an [Asset Creation Form](#) and forward it to the [National Assets team](#). A copy of the form should be attached to the relevant transaction when acquitting the expense in *Fraedom*.

For further information on portable and attractive items, contact the [National Assets team](#) or refer to CFI 07 and the AFP [Asset Management Policy](#).

5.3.2 Internet purchases

If goods are ordered via the internet under the terms of a Deed of Standing Offer (DoSO) such as stationery, uniform supplies or computer equipment, the process of ordering goods via the internet must be outlined clearly in the terms of the DoSO.

When ordering over the internet, the:

- ordering site must be secure (i.e. it should have a security key and the supplier's contact details, address, telephone and email should be identifiable)
- supplier must issue a tax invoice and receipt (within Australia) or a formal invoice and receipt (outside Australia)
- payment gateway must be encrypted.

5.4 Prohibited purchases

The AFP corporate card **must not** be used for the purposes outlined in the following subsections.

5.4.1 Purchasing items of a personal/private nature

It is the responsibility of an authorised AFP corporate cardholder to ensure government (official) funds are not used for purchases of a personal/private nature.

Personal expenditure is not permitted on the AFP corporate card. Accidental personal use of the card is considered to be inappropriate use of relevant money.

All accidental personal use must be repaid and reported in accordance with section 5.5 Reporting and repaying accidental personal purchases.

Coincidental personal expenditure means private expenditure incurred by an official in direct connection with their work duties. An official may use a Commonwealth credit card to pay a claim that includes both official and coincidental private expenditure. Coincidental private expenditure must be repaid prior to acquittal with evidence of repayment attached to the transaction in Freedom.

Pre-approved repayable personal expenditure – certain utility providers at some overseas posts do not accept private credit cards and require the use of a corporate card. Where the AFP corporate card is used in these circumstances, the senior liaison officer at post must monitor and manage this process, including by:

- initially assessing whether the transaction can be made by means other than the AFP corporate card
- reviewing the statement to properly identify private expenditure items
- ensuring timely and complete reimbursement of the private expenditure.

5.4.2 Purchasing goods and services subject to the WoAG coordinated procurement arrangements

WoAG coordinated procurement arrangements exist for a variety of purchases including laptops, monitors, mobile carriage services including mobile data services, major office machines including printers, photocopiers, multifunction devices, telecommunications services and Microsoft software. The arrangements for the purchase of these items are set out in the [AFP National Guideline on procurement and contracting](#).

This excludes purchases that have been conducted/brokered via the AFP's established contracts and associated arrangements (e.g. travel, accommodation, hire of vehicles).

5.4.3 Purchasing assets with a value exceeding \$5,000 (GST-exclusive)

These purchases must be transacted through *Insight!* Purchasing and require the completion of an [Asset Creation Form](#) as part of the shopping cart process.

5.4.4 Payment of invoices referencing an AFP purchase order

Where a system-generated purchase order has been issued to a supplier, the payment should be made through the AFP automated invoice processing system.

5.4.5 Purchasing controlled items

The arrangements for the purchase of these items are set out in the [AFP National Guideline on controlled items](#).

5.4.6 Purchasing meals while in receipt of a per diem (travel allowance)

Please refer to the [AFP National Guideline on travel and living away from home](#) for further details.

5.4.7 Tips of an unacceptable amount based on the country and custom

Prior to travel, the cardholder should become familiar with the customary tipping associated with the country being visited.

5.4.8 Any fuel purchases where a fuel card is available

AFP appointees must not use an AFP corporate card for fuel purchases unless an emergency situation makes a fuel card transaction impossible. Please refer to the [AFP National Guideline on AFP vehicles](#) for further details.

5.4.9 Procurement outside the cardholder's business area (cost centre)

AFP appointees must not use an AFP corporate card unless pre-approval has been provided from the relevant cost centre delegate and retained by the cardholder.

5.5 Reporting and repaying accidental personal expenditure

If an AFP appointee accidentally uses their AFP corporate card for personal purchases, they must arrange for reimbursement to the AFP for the full amount within one working day of becoming aware of the accidental use. The payment should be via one of the following methods:

- *Insight!* Repayments to enter a payroll deduction (preferred)
- direct deposit via EFT to the AFP main bank account
 - Further details can be obtained from the HUB [How do I pay back unspent money?](#) EFT payment details must be emailed to s 47E(d) AFP@AFP.GOV.AU for payment identification.

All instances must be reported to the AFP appointee's supervisor, who must consider all circumstances and determine whether the matter should be referred to Professional Standards. The supervisor must report the incident to the [Finance Governance team](#) via an email to s 47E(d) [@AFP.GOV.AU](mailto:AFP@AFP.GOV.AU) with the following information: the appointee's name, AFP ID, supplier, amount, date and whether the amount was refunded by the vendor or repaid by the appointee. This information will be included in the AFP's compliance reporting.

5.6 Acquittal of AFP corporate card transactions

5.6.1 Cardholder acquittals

It is the responsibility of the cardholder to ensure that all corporate card transactions are fully acquitted (coded and approved) within 28 days of the end of the statement period, using Fraedom. This includes refunds and personal or disputed transactions. The end of the statement period is the 26th day of each month.

Failure to acquit within this time frame may result in suspension of the card and will be reported accordingly.

By acquitting corporate card transactions, the cardholder must ensure that they:

- recognise the transaction
- correctly code and provide an informative reason for the expense
- link travel transactions to an approved travel requisition
- attach appropriate transactional evidence (tax invoices/receipts) for MasterCard transactions, including **all** cash withdrawals and purchases greater than or equal to \$82.50 to satisfy GST compliance obligations
 - Where the MasterCard transaction is equal to or greater than \$82.50 and a tax invoice/receipt is not available, cardholders must complete and attach a [statutory declaration](#) including relevant information on amount, date, purchase details and reason for no receipt.
 - Transactions on the Diners virtual card are considered GST-compliant and do not require the invoice to be attached unless requested by the cardholder's supervisor.

- Merchant receipts (from the EFTPOS terminal) and ATM cash withdrawal receipts are **NOT** considered as appropriate transactional evidence.
- attach pre-approval for relevant transactions – where the cardholder is not exercising their self-delegation of \$10,000 within their own business area (cost centre)
- send the completed transactions to the higher relevant approver.

5.6.2 Approvers

AFP corporate card transactions must be approved by the cardholder's current supervisor (team leader/sergeant or above). The approver is prefilled in Fraedom based on where AFP appointees are sitting within the organisation structure in SAP. These cardholder defaults are updated from SAP weekly.

5.6.3 Disputed transactions

As part of acquitting all transactions in Fraedom, the cardholder must check to ensure that there are no unrecognised transactions.

Suspicious transactions must be investigated with the supplier – this is the responsibility of the cardholder. If the supplier is not able to provide a suitable outcome, the cardholder must complete a [Disputed Transaction form](#), located on the AFP Corporate Card Hub page, as soon as practicable but no later than five working days after the disputed transaction has appeared in Fraedom.

The disputed transaction must still be acquitted in Fraedom, as per a normal transaction, with the disputed transaction form used as the attached evidence. Approvers must approve the transaction and should identify in the comments area in Fraedom that they are approving the transaction with the understanding that it is under dispute. If and when the transaction is refunded, it should be acquitted to the same codes as the disputed transaction.

5.7 Approval of AFP corporate card transactions

It is the role of the higher relevant approver to review and approve AFP corporate card transactions for their direct reports.

Approvers must consider and check the following when approving transactions:

- The AFP corporate card has been used for approved official expenses only.
- Relevant tax invoices/receipts are attached to MasterCard transactions greater than or equal to \$82.50. For transactions less than \$82.50, receipts are recommended but not mandatory if an informative description is included in the Reason for Expense field.
- Approval was obtained prior to travel for travel expenses.

- **All** cash withdrawals are acquitted correctly including relevant supporting documents such as a travel diary and supporting receipts.
- Supporting pre-approvals are attached to relevant transactions.

5.8 AFP appointees going on long-term leave

When taking leave in excess of 3 months and less than 12 months, AFP appointees must email the AFP [Corporate Cards team](#) and advise the intended dates of leave. The card will be suspended for the duration of the leave.

When taking leave in excess of 12 months, AFP appointees must email the AFP [Corporate Cards team](#), advise the intended dates of leave and shred or destroy the MasterCard. The card will be cancelled and the AFP appointee will need to reapply for an AFP corporate card when they return to work.

Prior to going on leave, the AFP appointee must ensure that:

- all transactions have been acquitted and approved
- any periodic direct debits have been cancelled or transferred to another AFP appointee's active card.

Do not leave the card with a supervisor or colleague.

5.9 AFP appointees leaving the AFP

AFP appointees must ensure the following activities related to the AFP corporate card are completed before leaving the AFP:

- All outstanding transactions recorded in Fraedom, including relevant attachments, have been acquitted.
- Any coincidental personal expenditure has been repaid.
- Any periodic direct debits have been cancelled or transferred to another AFP appointee's active card.
- The card has been shredded or destroyed responsibly.

As per the AFP off-boarding process, the supervisor must ensure all outstanding transactions are acquitted and approved prior to the last day of the AFP appointee's employment. If a cardholder leaves with outstanding transactions, the supervisor at the time must acquit the transactions on behalf of the cardholder; the [Fraedom and Travel Support team](#) can provide the supervisor with the appropriate access in Fraedom.

5.10 Compliance

5.10.1 Non-acquittal of AFP corporate card transactions

To ensure that fraudulent or incorrect transactions are detected and actioned and that expenses are correctly recorded in SAP against budgeted funds, corporate card transactions must be acquitted (coded and approved) in a timely manner:

- Acquittals that are not completed within 28 days of the end of the statement period are monitored and reported by the AFP Corporate Cards team. A follow-up reminder email should be sent to the cardholder, supervisor and assistant commissioner / national manager (SES Band 2).
- If transactions remain unacquitted after 14 days from this reminder, the card may be suspended. A Corporate Card Acquittal Period Extension form is available on the [AFP Corporate Cards](#) Hub page for extenuating circumstances.
- To have the suspension lifted, cardholders must acquit and have approved all outstanding transactions in Fraedom. Following this, a completed Corporate Card Reinstate Suspended Card form, located on the [AFP Corporate Cards](#) Hub page, must be submitted to the AFP Corporate Cards team.
- If a cardholder has their AFP corporate card suspended three times within a two-year period, a review will be undertaken. The card may be cancelled and the cardholder is not permitted to hold an AFP corporate card in the future.

5.10.2 Misuse of the AFP corporate card

Misuse of the AFP corporate card may result in an investigation by AFP Professional Standards. Some examples of misuse are:

- giving an AFP corporate card to someone else
- sharing a PIN
- sharing a Fraedom logon and password
- purchasing items of a personal/private nature
- repeated accidental use of the card for personal expenses
- unauthorised cash advances
- unauthorised use of another cardholder's corporate card
- purchasing uniform items
- sending transactions to a subordinate for approval in Fraedom.

Failing to comply with the guideline on appropriate acquittal documentation is reported to the Finance Governance team. This includes incorrectly attaching merchant receipts as proof of purchase, attaching unreadable receipts and not including pre-approvals for relevant transactions.

6. Further advice

Further information on how to use Fraedom to complete corporate card transaction acquittals and approvals can be found at *Insight!* [Online Help](#).

For further information and frequently asked questions on the AFP corporate card, please visit the [AFP Corporate Cards](#) Hub page.

Queries about the content of this guideline should be referred to the AFP Corporate Cards team: s 47E(d) afp.gov.au.

7. References

Legislation

- [Australian Federal Police Act 1979](#) (Cth)
- [Public Governance, Performance and Accountability Act 2013](#) (Cth)
- [Public Governance, Performance and Accountability Rule 2014](#) (Cth)

AFP governance instruments

- [AFP Commissioner's Financial Instructions](#)
- [AFP Commissioner's Order on professional standards \(CO2\)](#)
- [AFP National Guideline on procurement and contracting](#)
- [AFP National Guideline on hospitality and entertainment](#)
- [AFP National Guideline on travel and living away from home](#)
- [AFP National Guideline on representation expenditure](#)
- [AFP National Guideline on gifts and benefits](#)
- [Resource Management Guide No. 417: Supplier Pay On-Time or Pay Interest Policy \(RMG 417\)](#)

Other sources

- [Request for Approval and Acquittal of Official Hospitality](#)
- [Asset Creation Form](#)

8. Shortened forms

AFP	Australian Federal Police
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CFIs	Commissioner's Financial Instructions
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CFO	Chief Financial Officer
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EFT	electronic funds transfer
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EFTPOS	electronic funds transfer at point of sale
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GST	goods and services tax
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PRS	Professional Standards
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RMG	Resource Management Guide
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9. Definitions

AFP appointee means a deputy commissioner, AFP employee, special member or special protective service officer and includes a person:

- engaged under section 35 of the AFP Act as a consultant or contractor to perform services for the AFP and determined under section 35(2) of the AFP Act to be an AFP appointee
- engaged overseas under section 69A of the AFP Act or
- seconded to the AFP under section 69D of the AFP Act.

(See section 4 of the [AFP Act](#).)

AFP corporate card is issued to AFP appointees to pay for official expenses in accordance with this national guideline. The AFP has two corporate cards, the Diners virtual card and the MasterCard card in hand.

Controlled items are AFP items that, if lost, may pose a risk to the AFP either through compromise of communications or through the potential for these items to harm or enable harm to AFP appointees, AFP partners and/or members of the public.

Deed of Standing Offer is an arrangement setting out the terms and conditions, including a basis for pricing, under which a supplier or members of a panel agree to supply specified goods and services for a specified period, as set out in an official order.

Fraedom is the travel and expense management system used by the AFP to acquit corporate card transactions and manage travel requisitions. A Fraedom account is automatically created for new AFP employees and corporate card transactions are automatically uploaded from the credit card provider into AFP appointee's Fraedom account.

Fraedom app is available from the Apple Apps store, Google Play or iTunes. The app can be used to capture travel receipts to the Fraedom image library and to acquit and approve transactions on the go. It can be used on personal and official mobile phones or devices.

Hospitality and entertainment relevant definitions are contained in the [AFP National Guideline on hospitality and entertainment](#).

Personal/private expenditure means any expenditure that is the liability of an AFP appointee and not the AFP. Personal expenditure on the AFP corporate card is

prohibited.

10. Attachments

Summary 1/7/2022 – changes to the AFP National Guideline on using the AFP corporate credit card.