

Mr John Gilchrist
Freedom of Information Officer

5 December 2017

Ref: FOI/November 2017/ Jacob Dirnhuber

By email to foi@jtdirnhuber.com

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Dear Mr Dirnhuber

Your request for information received on 2 November 2017 has been dealt with under the provisions of the Freedom of Information Act 2000 (FOIA).

You asked:

1. How many Middlesex University procurement cards and/or corporate credit cards (or equivalent purchase cards) are currently in active use?
2. Have you had an internal audit of card spending since 01/01/2012? If so, please provide any reports(s) written as a result of these audits.
3. A copy of Middlesex University's current purchase card policy
4. If any procurement/corporate credit card holder has been reprimanded for its usage or had a transaction queried for validity since 01/01/2012, please provide the details (redacted if necessary).
5. The name of the bank(s) or organisation(s) who provide your procurement cards/purchase cards/corporate credit cards.
6. The following spending details on all Procurement Cards/Corporate Credit Cards and any other payment cards in .csv/.xls/.xlsx format:
 - Posted date and occurred date (if available)
 - Billing amount (please state how you express returns e.g. as a negative number, as a number in brackets or other variations)
 - Merchant name (as expressed in the bank statements if available)
 - Justification if given

I am requesting the information for Question 6 for 2016 and 2017 so far.

University Response

1. 197
2. Our finance systems have an in-built audit function which randomly selects a number of credit card payments for additional validation checking. Card spend is not allowed without the associated receipts, paperwork or authorisation. Additionally we carried out an internal audit of our Accounts Payable in February 2017 and no findings were raised in relation to purchasing card payments.
3. The University's Purchasing Card Policy is currently undergoing a review and the latest version has not yet been formally approved by the Chief Financial Officer so we do not hold this information in a finalised format.
4. This has not occurred during the period you have specified in the question.
5. NatWest
6. Whilst we hold the information you have requested we are writing to advise you that it has been necessary to refuse this part of the request under the Freedom of Information Act (FOIA).

We estimate that compliance with your request would exceed the appropriate costs limit established by section 12 of the Freedom of Information Act 2000; this is currently set at £450 (or 18 hours work) by virtue of the [1] Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. Our estimate has considered the time it would take to determine whether we hold the information and then to locate, retrieve and extract it. We estimate that to determine whether we hold the requested information, and then to locate, retrieve, and extract that information would take longer than 18 hours to complete.

This is mainly due to the fact that we would be required to compile 24 months' worth of expenses reports for circa 200 staff (the number of credit card holders will have varied slightly over the 2 year period). This part would take at least 4 hours at a conservative estimate. We would then be required to manually re-format the reports into the format you have requested and confirm the contractual terms we have with each supplier (of which there are hundreds) to ensure if each supplier considers our total spend with them to be commercially sensitive as per the definition in section 43(2) of the Freedom of Information Act 2000. This part would take at least 297 hours at a conservative estimate. That is 301 hours to complete at a conservative estimate, so well above the 18 hour threshold. So in accordance with Section 17 of the Freedom of Information Act 2000, (the Act), this letter acts as a Refusal Notice.

A limited number of the supplier details are also withheld under section 40(2) of the Freedom of Information Act which covers the personal data of third parties where complying with the request would breach any of the principles in the Data Protection Act. It would not be fair to the data subject to disclose their personal data and so the University considers the information to be exempt from disclosure.

If this question could be refined to request total spend via purchasing cards for each year it would be possible to provide a response within the appropriate cost limit established by section 12 of the Freedom of Information Act 2000.

I trust this satisfies your request sufficiently. Under the Freedom of Information Act 2000, you have the right to complain about the University's response to your request for information. If you have such a complaint, you may contact Mrs Teresa Kelly, Clerk to the Board of Governors, Middlesex University, Hendon campus, London NW4 4BT, tel: 020 8411 6018, t.kelly@mdx.ac.uk within 40 days of the date of this letter for a review of the University's decision. If you remain unsatisfied with the outcome of that complaint, you may seek further recourse by lodging an appeal with the Information Commissioner.

Yours sincerely

John Gilchrist
Freedom of Information Officer