

Report by the Comptroller and Auditor General

Cross-government

Investigation into government travel expenditure

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Investigation into government travel expenditure

Report by the Comptroller and Auditor General

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This report has been prepared under Section 6 of the National Audit Act 1983 for presentation to the House of Commons in accordance with Section 9 of the Act

Sir Amyas Morse KCB Comptroller and Auditor General National Audit Office

6 March 2015

We investigated concerns about central government travel expenditure raised in the national media, and by Parliament and the public.

Investigations

We conduct investigations to establish the underlying facts in circumstances where concerns have been raised with us, or in response to intelligence that we have gathered through our wider work.

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Contents

What this investigation is about 4

Summary 5

Central government travel expenditure, and how and where officials travel 8

Controlling travel expenditure 26

Appendix One 50

Appendix Two 53

The National Audit Office study team consisted of: Mark Bisset, Liam Blanc and Kirsten Payne, under the direction of Keith Davis.

This report can be found on the National Audit Office website at www.nao.org.uk

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What this investigation is about

1 In 2013 the Cabinet Office released information about nearly 236,000 flights taken by central government officials.¹ Public scrutiny resulted in allegations that some travel was unnecessary, unreasonably expensive and used non-standard class rail travel and non-economy class air travel excessively.

2 The Cabinet Office withdrew these data, stating that they were inaccurate and released in error. Following national media reporting of the allegations above, and Parliamentary and public interest, we decided to investigate:

- central government travel expenditure, including how and where officials travel; and
- policies and controls over central government travel expenditure, and whether they deter, prevent and identify inappropriate spending.

3 This report analyses government travel expenditure. We would expect to see variation in how much departments travel, and how much they spend, depending on their responsibilities. This investigation does not seek to identify the reasons for this variation, but presents the facts to increase transparency and public and Parliamentary accountability.

- 4 Our fieldwork took place between April and November 2014.
- 5 Our methods are set out in Appendix One.

Summary

Key findings

6 Travel expenditure is a small proportion of central government expenditure, but is of high public interest and misuse can cause serious reputational damage. The government has introduced measures to reduce travel costs and, in 2013-14, the overwhelming majority of officials travelled standard class by rail and economy class by air. We found little evidence that departments are actively managing demand and the centre of government does not consider this to be part of its role. The numbers of individual rail journeys and flights recorded by central government departments have increased between 2009-10 and 2013-14, despite advancements in video and teleconferencing technology and headcount reductions, although the number of overnight hotel bookings has decreased over the same period.

Findings on what central government spends on travel

7 Although it has put systems in place to capture travel data, government has incomplete knowledge of what it spends on travel. In 2013-14 central government identified £546 million of travel expenditure through travel contracts, and some government procurement card expenditure. However, this analysis does not routinely capture expenditure claimed by officials as expenses. Analysis of central government data suggests that travel expenditure has increased by at least 11% in real terms since 2010-11.² We found that publicly-available travel expenditure data are not complete and prepared on an inconsistent basis.

Findings on how and where officials travel

8 Most central government travel is standard class by rail and economy class by air.³ In 2013-14:

Rail

Central government departments booked 1.2 million rail journeys costing £75.7 million, of which 99% were standard class. However, 41% of rail tickets were anytime flexible tickets, the most expensive standard-class tickets available.

• Flights

Central government departments booked 304,000 flights costing £105.4 million, of which 94% were economy class. The most common international flight destinations were the USA and Germany (together 25% of all international flights). The Foreign & Commonwealth Office used business class most often (25% of its international flights). Of only 259 first-class flights in 2013-14, 207 (80%) were by Ministry of Defence officials.⁴

Hotels

Central government departments made international and domestic hotel bookings worth £57.6 million. Of the 621,000 hotel room nights costing £41.1 million booked in the UK, the average cost was £66 a night. However, average hotel costs vary by department, even for the same location. For example, £82 to £127 for hotels booked in London.

Findings on how government seeks to control travel expenditure

9 Travel expenditure is a small proportion of central government expenditure, but is of high public interest and misuse can cause serious reputational damage. In 2012-13 central government recorded £489 million of travel expenditure. This is 0.3% of the £163 billion government spent on goods and services. Although it represents only a small proportion of overall government spending, inappropriate travel expenditure can seriously damage reputations. Parliament and the public expect officials to travel cost-effectively, and for this public spending to be carefully controlled.

³ The figures quoted below show travel booked by the 17 central government core departments through Crown Commercial Services (CCS) framework contracts. Throughout the report we have focused on expenditure on hotels, rail and air tickets as these are the main areas of government expenditure.

⁴ A significant portion of Ministry of Defence first-class flights were internal flights in the USA and Middle East, where only first and economy class is offered. These first-class tickets are equivalent to business class on international flights. Owing to the manner in which the data is presented, we are unable to quantify the exact number of these flights.

10 Despite the reputational risk, the centre of government has little oversight of official travel although it does seek to manage the price of travel purchased. It lacks comprehensive travel expenditure and usage data, and makes limited use of the data it does have to monitor and analyse trends and variation both between departments and for government as a whole. It developed a set of Business Travel Policy Principles (the Principles) to inform departmental travel policies, but we found varying degrees of awareness of the Principles at the 10 government organisations we spoke to. The Principles were not integrated with other cross-government initiatives such as the Greening Government commitments. The centre of government focuses on managing the price of travel purchased and has achieved savings through the introduction of central procurement frameworks for goods and services. It does not monitor overall demand for travel as it sees this as departments' responsibility.

11 Based on our interviews with officials in 5 departments, we conclude that departments are not managing demand for government travel sufficiently actively. We would expect departments to have a sophisticated understanding of what level of travel is required for them to conduct their business, but found that in general departments have focused on reducing costs rather than actively managing overall demand. The numbers of individual rail journeys and flights recorded by central government department increased between 2009-10 and 2013-14, despite headcount reductions and advancements in video and teleconferencing technology. We note, however, that the number of overnight stays has decreased over the same period.

12 There is considerable variation between departmental travel policies and between travel expenditure controls. For example, there is no standardisation among departments as to when officials can travel non-standard class by rail and non-economy class by air. Hotel rate-caps vary in the same location, for example from £110 to £150 a night in London. Departments employ a range of preventative, detective, payment and deterrent controls over travel expenditure. Preventative controls may be minimised to facilitate travel. However, flexibility is not consistently balanced with robust detective controls to identify off-policy or fraudulent travel, or both.

13 We found that 4 out of the 100 transactions we tested at central government organisations did not comply with travel policies, which suggests that these organisations need to strengthen controls. Our limited testing at central government organisations identified 4% of transactions as non-compliant with travel policies, indicating controls were absent or not operating as intended. This suggests that several central government organisations need to strengthen their controls.

Central government travel expenditure, and how and where officials travel

The facts

What central government spends on travel

1.1 There is limited transparency of central government travel expenditure: publicly-available data are incomplete and prepared inconsistently.

• Departmental annual reports and accounts

Out of 17 central government departments, 16 publish some information on travel expenditure in annual reports and accounts. However, published costs are inconsistent, making comparisons difficult.

• Data.gov and gov.uk

Travel expenditure data hosted on these websites typically cover only some aspects of travel expenditure, such as expenses incurred on departmental business by senior civil servants and ministers. It does not give information about total central government expenditure on travel.

Whole of government accounts

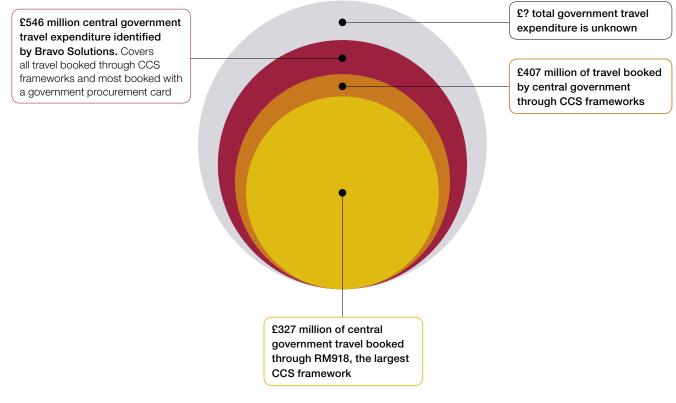
The whole of government accounts do not disclose travel expenditure as a separate category showing how much the government has spent on travel.

1.2 Even including non-published data sources, the government has limited knowledge of what it spends overall on travel and lacks comprehensive expenditure information. Bravo Solutions runs the Cabinet Office analytics tool to capture procurement information from across government. It estimates that it captures approximately 92% of total government expenditure, but does not know what proportion of travel expenditure it captures. Bravo Solutions' data captures all travel expenditure through the Crown Commercial Service (CCS) frameworks and most travel expenditure booked through government procurement cards. However, the quality of data is reliant on departments providing accurate and detailed information from their accounts payable systems. Bravo Solutions' data therefore are unlikely to identify travel expenditure claimed back as expenses by officials, and there is a risk that non-travel expenditure may be misallocated by departments to travel costs.

1.3 In 2013-14 Bravo Solutions' data identified £546 million of central government travel expenditure through travel contracts, and some government procurement cards. Of this, £407 million was through central government travel management framework contracts. The largest framework accounted for £327 million (80%) of this expenditure (**Figure 1**).

Figure 1

Travel expenditure captured by different government data sources, 2013-14

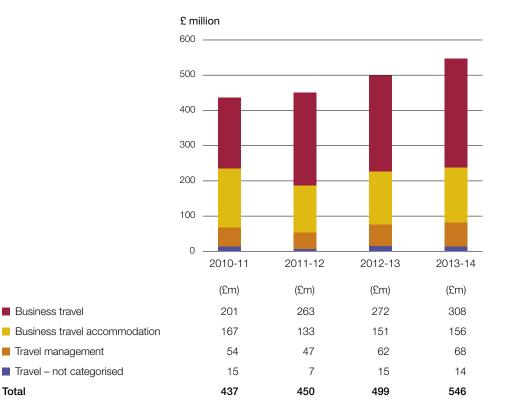


Source: Crown Commercial Service and Bravo Solutions

1.4 Bravo Solutions' data suggest that government travel expenditure has increased by 25% since 2010-11 in real terms (**Figure 2**).

Figure 2

Central government travel expenditure recorded by Bravo Solutions, 2010-11 to 2013-14



Notes

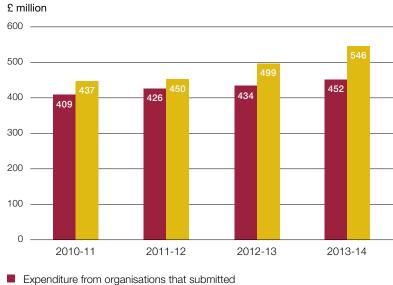
- 1 Business travel accommodation includes hotels and 'events organisation'.
- 2 We have followed current government guidance and used the GDP deflator to show the effects of inflation on public spending series. The GDP deflator is a much broader price index than the CPI, RPI, or PPI as it reflects the prices of all domestically produced goods and services in the economy. The rates of inflation affecting specific sectors, such as travel, could be much higher or lower than the GDP deflator suggests as it reflects the economy as a whole.
- 3 Figures may not sum exactly because of rounding.

Source: Bravo Solutions

1.5 Bravo Solutions' data have become more complete over time, with expenditure included from more sources and in greater detail.⁵ This makes comparing figures difficult, as later years' data contain information from more government bodies. **Figure 3** gives a more consistent picture, capturing only those organisations that submitted data in all 4 financial years (2010-11 to 2013-14). These figures also suggest that government travel expenditure has risen since 2010-11, although the increase is lower at around 11% in real terms.

Figure 3

Central government travel expenditure recorded by Bravo Solutions, 2010-11 to 2013-14



data to Bravo Solutions for all 4 years

Note

These figures have been inflation-adjusted using the government's GDP deflator and are shown in 2013-14 prices. We have followed current government guidance and used the GDP deflator to show the effects of inflation on public spending series. The GDP deflator is a much broader price index than the CPI, RPI, or PPI as it reflects the prices of all domestically produced goods and services in the economy. The rates of inflation affecting specific sectors, such as travel, could be much higher or lower than the GDP deflator suggests as it reflects the economy as a whole.

Source: Bravo Solutions

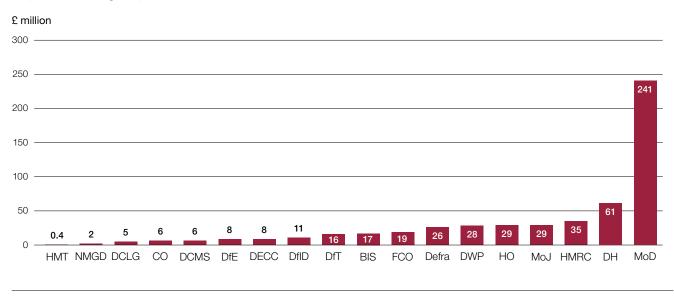
5 Between 2010-11 and 2013-14 Bravo Solutions captured increasingly detailed expenditure data, and data from more public organisations.

Total expenditure per Bravo Solutions

1.6 Figure 4 shows travel expenditure by departmental group in 2013-14, as captured by Bravo Solutions. The Ministry of Defence was the largest procurer of travel in central government in 2013-14, accounting for 44% of travel expenditure.

Figure 4

Expenditure on travel, business travel accommodation and events organisation by departmental group, 2013-14



	£
Travel – not categorised	13,956,569
Travel management	68,254,564
Business travel	308,360,839
Business travel accommodation	87,724,563
Events organisation	68,151,871

Notes

1 Departmental groups include a core department and its associated public organisations. The proportion of expenditure attributable to core departments varies considerably by group.

BIS = Department for Business, Innovation & Skills; CO = Cabinet Office; DCLG = Department for Communities and Local Government;
 DCMS = Department for Culture, Media & Sport; DECC = Department of Energy & Climate Change; Defra = Department for Environment,
 Food & Rural Affairs; DfE = Department for Education; DfT = Department for Transport; DfID = Department for International Development;
 DH = Department of Health; DWP = Department for Work & Pensions; FCO = Foreign & Commonwealth Office; HMRC = HM Revenue & Customs;
 HMT = HM Treasury; HO = Home Office; MoD = Ministry of Defence; MoJ = Ministry of Justice; NMGD = Non-ministerial government departments.

Source: Bravo Solutions

1.7 It is not possible to extract reliable data from Bravo Solutions in more detail, for example to show the proportion of travel expenditure on flights or rail tickets. Bravo Solutions relies on departments and associated public organisations to give supplementary expenditure data, and to classify it correctly. Government bodies do this inconsistently. Therefore, any further analyses using these data would be incomplete and potentially misleading.

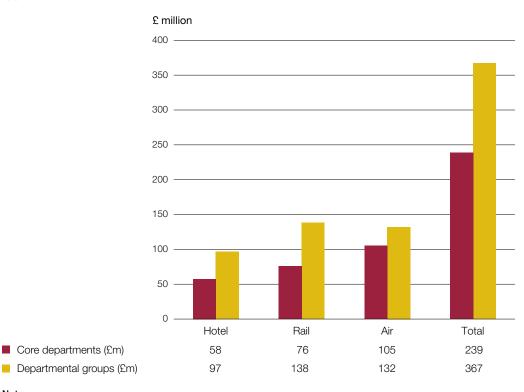
How officials travel

1.8 The CCS receives information from travel management companies on all bookings made through its framework contracts. These frameworks cover hotel, air and rail bookings, but not taxis. We analysed a subset of the £407 million spent through CCS frameworks (Figure 1). We analysed this data set, as opposed to departmental data, as it is prepared on a consistent basis across government, making in-depth cross-government comparisons possible. Our analyses focused on travel booked by the 17 core departments. It excludes other organisations' bookings within the same departmental group – most departments do not have access to, or control, this expenditure. This is consistent with our review of travel policies, which only examined core departmental policies.

1.9 The CCS data differ from that held by departments as they show booked, rather than invoiced, travel. This means that the data include travel bookings that have been cancelled and never charged to departments. The CCS collects these data in order to track booker intention and behaviour. While this means that the data are likely to be overstated, the data available on invoiced travel are less detailed. The difference between the two sets is approximately 19%: in 2013-14 the CCS recorded £503 million of travel booked through the frameworks, compared with £407 million invoiced.

1.10 The 17 core departments booked travel worth £238.7 million in 2013-14. Air was the largest category of expenditure, accounting for 44% of total bookings (**Figure 5** overleaf).

Departments' expenditure through CCS frameworks by expenditure type, 2013-14



Note

1 These figures are based on travel that the 17 core departments booked. Some bookings may have been cancelled subsequently and never charged to departments, so the expenditure is overstated.

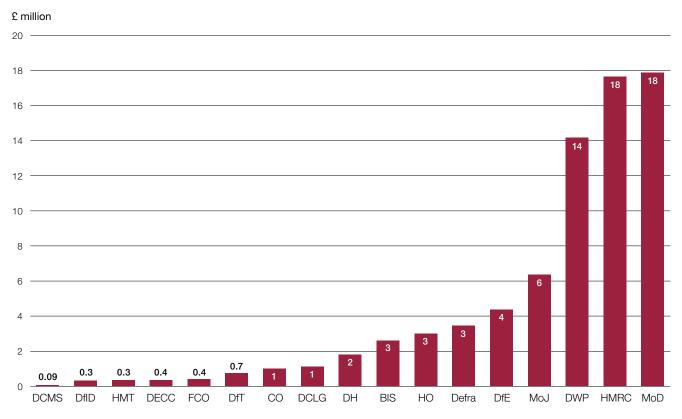
Source: Crown Commercial Service

Rail

1.11 During 2013-14 central government departments booked rail travel costing £75.7 million. The Department for Work & Pensions, HM Revenue & Customs and the Ministry of Defence accounted for nearly two-thirds of this expenditure. This is as expected as they are the three largest departments by headcount (**Figure 6**).

1.12 During 2013-14 departments booked 1,189,656 rail tickets at an average cost of £64. Of these, 1,174,448 (98.7%) were standard-class and 13,654 (1.1%) were first class. The proportion of standard-class rail bookings booked by departments varied between 100% and 94.6% (**Figure 7** on page 16).

Core departments' expenditure on rail through CCS frameworks, 2013-14



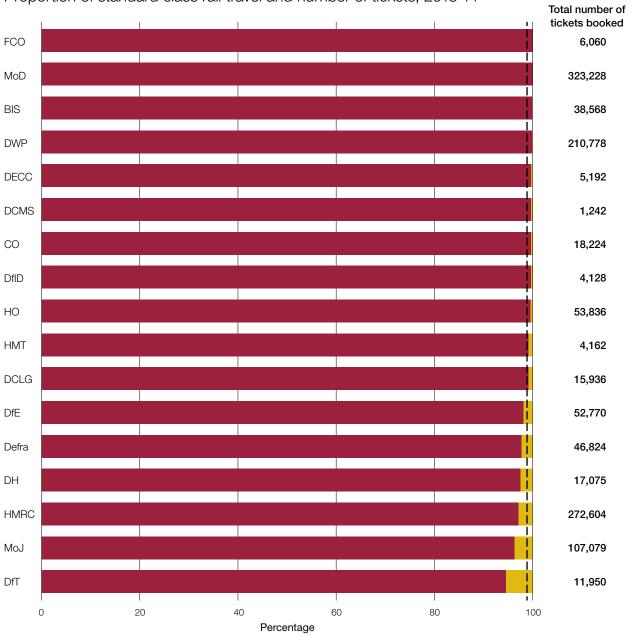
Notes

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 HMT = HM Treasury; HO = Home Office; MoD = Ministry of Defence; MoJ = Ministry of Justice.

Source: Crown Commercial Service

1.13 There was considerable variation in the number of advance and anytime train tickets departments booked (**Figure 8** on page 17). Departments booked 492,177 anytime rail tickets (41.4% of all tickets) in 2013-14. Anytime rail tickets are normally the most expensive. By contrast, advance tickets are generally the cheapest, but have to be booked several days before travel. Departments booked 281,385 (23.7%) advance tickets in 2013-14. Our analysis of several intercity train journeys suggests that anytime fares are typically between two and five times more expensive than the cheapest advance fares. Advance tickets are often available only for longer rail journeys, so departments with significant volumes of short rail journeys are likely to book a lower proportion of advance tickets.



Proportion of standard class rail travel and number of tickets, 2013-14

Notes

Standard class

Non-standard class

1 The data column shows the total number of rail tickets that departments booked in 2013-14. Return tickets are classed as one ticket in this analysis.

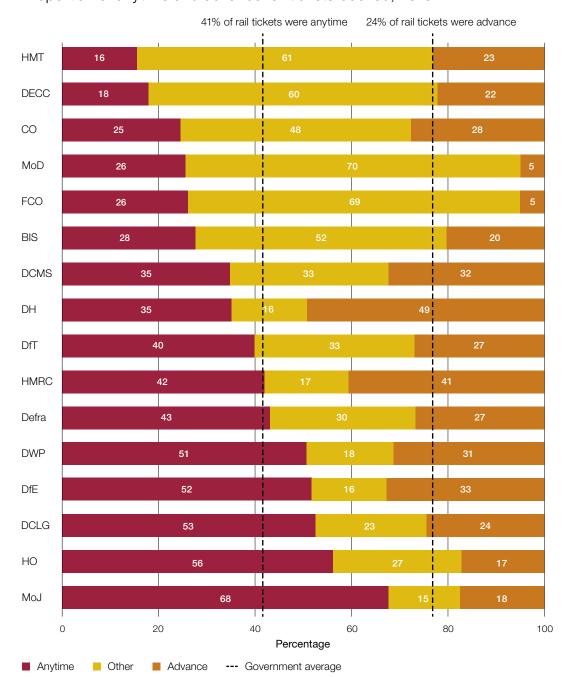
2 We treat the 3,584 'economy'-class bookings made on Eurostar services as standard class, and the 962 'premium economy' and 592 'business'-class bookings as non-standard.

--- Government average: 98.7% standard class

3 The Department for Transport revised its travel policy in October 2014, removing officials' contractual right to non-standard class rail travel.

4 BIS = Department for Business, Innovation & Skills; CO = Cabinet Office; DCLG = Department for Communities and Local Government; DCMS = Department for Culture, Media & Sport; DECC = Department of Energy & Climate Change; Defra = Department for Environment, Food & Rural Affairs; DfE = Department for Education; DfT = Department for Transport; DfID = Department for International Development; DH = Department of Health; DWP = Department for Work & Pensions; FCO = Foreign & Commonwealth Office; HMRC = HM Revenue & Customs; HMT = HM Treasury; HO = Home Office; MoD = Ministry of Defence; MoJ = Ministry of Justice.





Notes

1 The CCS does not hold information on the types of rail tickets DfID booked.

2 Due to rounding, not all bars add up to 100%.

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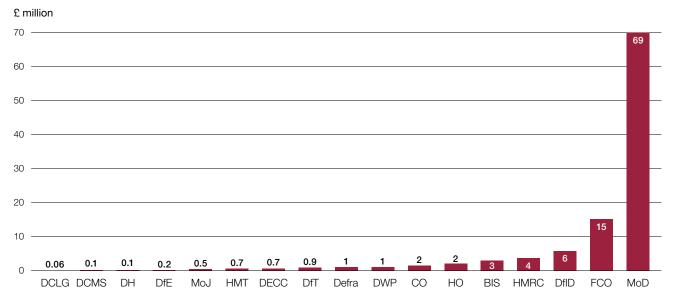
Flights

1.14 During 2013-14 government departments booked flights costing £105.4 million. The Ministry of Defence accounted for 65% of these bookings by value (**Figure 9**).

1.15 Departments booked 304,418 flights in 2013-14 at an average cost of £346. Of these, 145,339 flights were domestic and 159,079 were international. Of the domestic flight bookings, 144,870 (99.7%) were economy class, while 140,840 international flights (88.5%) were economy class. There was considerable variation between departments in the proportion of economy and non-economy class international flights booked (**Figure 10** on pages 19 and 20). Most departments allow non-economy class air travel for flights over a certain duration (Figure 22). Departments with a higher proportion of intercontinental flights are more likely to have a higher proportion of non-economy class air travel.

Figure 9

Core departments' expenditure on flights through CCS frameworks, 2013-14



Notes

1 These figures are based on travel that the 17 core departments booked. Organisations may subsequently cancel bookings, so the figure is likely to be overstated.

BIS = Department for Business, Innovation & Skills; CO = Cabinet Office; DCLG = Department for Communities and Local Government;
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International air travel bookings by class, 2013-14

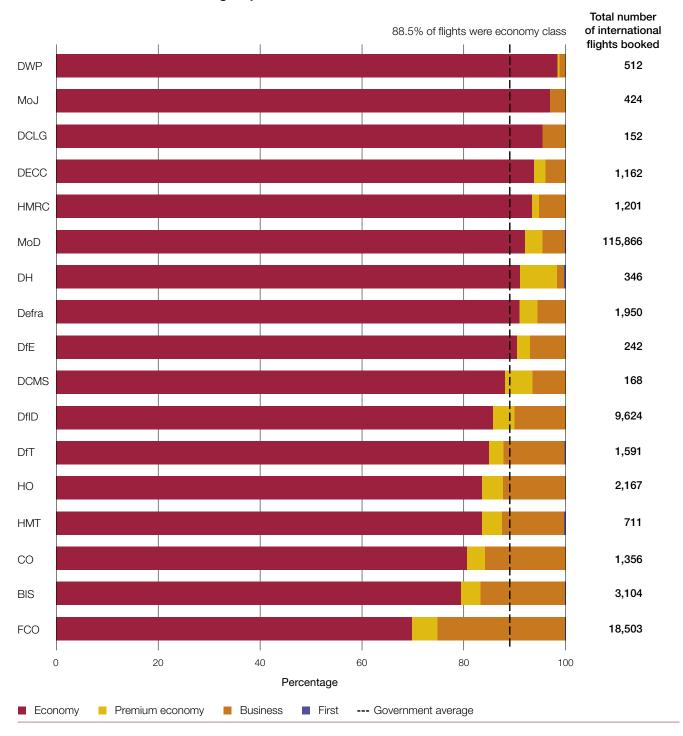


Figure 10 continued International air travel bookings by class, 2013-14

Notes

- 1 There were 259 first-class flights booked out of a total of 159,079 international flights in 2013-14. A significant proportion of MoD first-class flights were internal overseas flights in the USA and Middle East, where only first and economy class is offered. These first-class tickets are equivalent to business class on international flights.
- 2 The Foreign & Commonwealth Office redacted the start and finish points of 6,449 flights. We treat these as international flights as this is most consistent with the department's travel profile.
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Source: Crown Commercial Service

1.16 In 2013-14 departments booked flights to many international destinations. Given the Ministry of Defence accounts for 73% of all international flights, the results correlate strongly with where the department has bases or carries out training for service personnel. The USA and Germany were the most common destinations (**Figure 11**), together accounting for 25% of international flights.

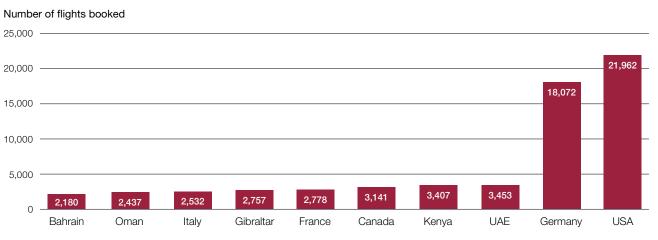
Hotels

1.17 During 2013-14 government departments booked hotels costing £57.6 million. The Ministry of Defence accounted for more than half of the bookings by value (**Figure 12** on page 22).

1.18 The CCS data show that 620,820 UK hotel room-nights were booked by officials through its travel framework contracts in 2013-14. In total, these hotel bookings cost \pounds 41.1 million, with an average cost of \pounds 66.18 per room per night.

1.19 The Cabinet Office's Principles suggest that departments should have separate rate-caps for hotel bookings in London, other major UK cities, and the rest of the UK.Figures 13, 14 and 15 on pages 23, 24 and 25 set out the average cost of a hotel room night in these 3 locations. There is considerable variation between hotel rates that departments pay in each location. Hotels in London are considerably more expensive than those in the rest of the UK.

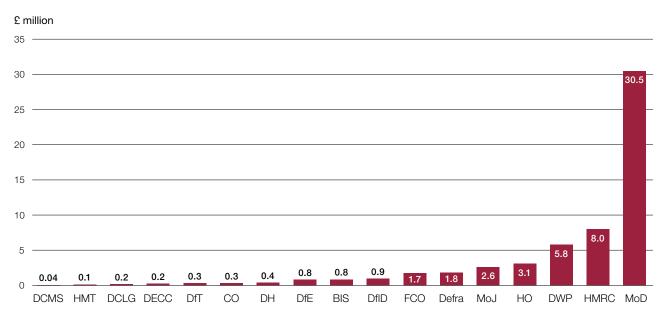
Ten most common international destinations for air travel, 2013-14



Note

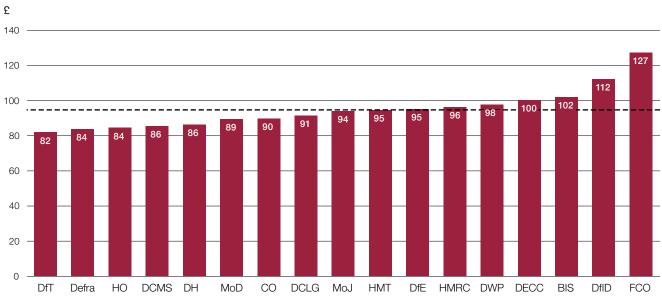
1 Of the 19,800 flights booked by the Foreign & Commonwealth Office, the destinations of 6,449 were redacted.

Core departments' expenditure on hotels through CCS frameworks, 2013-14



Notes

- 1 These figures are based on travel that the 17 core departments booked. Departments may have cancelled some of these bookings later, so the figure overstates expenditure.
- 2 This Figure, and Figures 13–15, only include hotels booked and paid for through the travel management companies using a system known as 'billback', as this was the only data available to the CCS for 2013-14. The Ministry of Defence books a significant proportion of hotel rooms by other means; most notably 'pay and claim' whereby the room is booked through the Hogg-Robinson system, but the cost is paid directly to the hotel. The Ministry of Defence suggests that its true expenditure on hotels for 2013-14 was £43.5 million once bookings outside of 'billback' are added.
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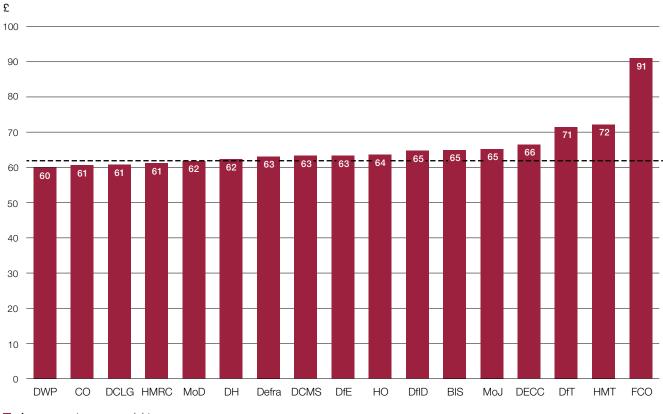
Average cost of hotel room per night in London, 2013-14

Average cost per room-night

--- Government average: £94.44 per room-night

Notes

- 1 This covers all hotel bookings for locations within the M25.
- 2 These figures exclude VAT. VAT is usually chargeable on hotel rooms at the standard rate of 20%.
- 3 Some bookings may have been cancelled subsequently and never charged to departments, so the average costs may be under- or over-stated.
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Average cost per room-night

--- Government average: £61.81 per room-night

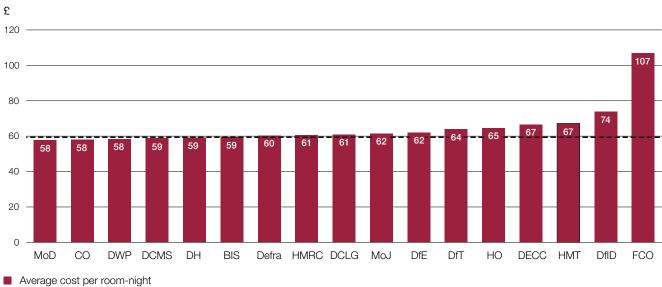
Notes

1 This covers hotel bookings in Aberdeen, Birmingham, Belfast, Bristol, Cardiff, Coventry, Edinburgh, Glasgow, Harlow, Leeds, Liverpool, Manchester, Middlesbrough, Newcastle, Oxford, Portsmouth, Reading, Sheffield and York.

2 These figures exclude VAT. VAT is usually chargeable on hotel rooms at the standard rate of 20%.

Average cost of hotel room per night in major UK cities, 2013-14

- 3 Some bookings may have been cancelled subsequently and never charged to departments, so the average costs may be under- or over-stated.
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Average cost of hotel room per night in other UK locations, 2013-14

--- Government average: £58.86 per room-night

Notes

- 1 These figures exclude VAT. VAT is usually chargeable on hotel rooms at the standard rate of 20%.
- 2 Some bookings may have been cancelled subsequently and never charged to departments, so the average costs may be under- or over-stated.
- BIS = Department for Business, Innovation & Skills; CO = Cabinet Office; DCLG = Department for Communities and Local Government; DCMS = З Department for Culture, Media & Sport; DECC = Department of Energy & Climate Change; Defra = Department for Environment, Food & Rural Affairs; DfE = Department for Education; DfT = Department for Transport; DfID = Department for International Development; DH = Department of Health; DWP = Department for Work & Pensions; FCO = Foreign & Commonwealth Office; HMRC = HM Revenue & Customs; HMT = HM Treasury; HO = Home Office; MoD = Ministry of Defence; MoJ = Ministry of Justice.

Controlling travel expenditure

The facts

Central oversight of government travel

2.1 In 2010-11 the Cabinet Office announced measures to reduce government spending, which could influence government travel.

Civil service staff reductions

In March 2014 there were 405,070 full-time equivalent civil servants, a reduction of 73,060 (15%) since the 2010 spending review.⁶

Budget reductions

Departmental budgets have been tightened considerably since 2010, creating pressure to reduce costs.

• Video- and teleconferencing

Technology is increasingly available across government.

Greening Government commitments

In February 2011 the government set goals and associated reporting requirements for departments to tackle carbon emissions, water use, waste and supply chain impacts.⁷

2.2 The Cabinet Office and HM Treasury have tried to influence central government procurement of travel in several ways:

• Restricting first-class travel

In May 2010 the Chief Secretary to the Treasury announced that "first class fares are very expensive and should be avoided by all public servants wherever possible", and that HM Treasury would monitor this closely. However, a ban on first-class travel was never implemented as policy. HM Treasury does not monitor first-class travel across government.

Business Travel Policy Principles

In 2011 the Cabinet Office and the CCS (formerly Buying Solutions), in consultation with several departments, developed the Business Travel Policy Principles. These Principles included guidance for departmental travel policies and set aspirational targets for travel bookings. Despite obvious synergies with the Greening Government commitments, the Principles did not mention environmental issues.

⁶ These figures reflect changes in civil service FTE numbers, see Table 8 available at: www.ons.gov.uk/ons/publications/ re-reference-tables.html?edition=tcm%3A77-335605

⁷ Departments are required to reduce the number of domestic flights by 20% from 2009-10 levels, by 2015. Departments are not required to report carbon emissions resulting from international flights.

The Cabinet Office established the travel category governance board to encourage departments to take up the Principles. Departments remain responsible for travel policies, and there remains scope for departments to set their own travel policies to match their business requirements, for example reflecting the frequency and duration of travel required of their staff.

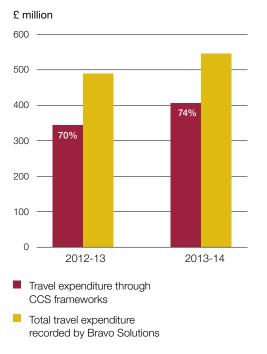
The status of the Principles is not well understood. The Principles have never been formally withdrawn, and no new guidance has been issued to replace them. However, we found little awareness of the Principles at the 10 government organisations we spoke to and there was confusion as to whether they remained current.

Central travel management framework contract

In 2011, the Cabinet Office and HM Treasury required all departments to use the central government travel management services framework. This was also made available to other central government organisations. The framework set guaranteed prices and management fees. Call-off contracts were signed by 162 central government organisations, including all departments, to use these travel management services. Over the past two years, the proportion of travel expenditure procured through CCS frameworks has increased from 70% to 74% of central government travel expenditure recorded by Bravo Solutions (**Figure 16**).

Figure 16

Travel bought through CCS frameworks compared with total travel costs recorded by Bravo Solutions, 2012-13 to 2013-14

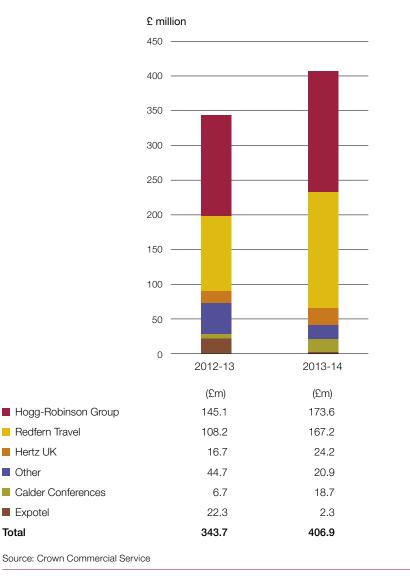


Source: Crown Commercial Service and Bravo Solutions

2.3 Not only has more travel been booked using central frameworks, expenditure is increasingly concentrated in one framework with two travel management suppliers: Redfern Travel and Hogg-Robinson Group. These are the largest suppliers, accounting for more than 80% of government travel expenditure through CCS frameworks in 2013-14 (**Figure 17**).

Figure 17

Travel expenditure through CCS frameworks by supplier, 2012-13 to 2013-14



2.4 In 2013-14 the CCS reported savings of £138.5 million on travel expenditure through 10 central government travel frameworks, compared with the 2009-10 baseline. This saving is for travel expenditure made through the framework contracts that the CCS negotiated. The government is making savings because it is procuring cheaper travel in real terms, even though central government booked more travel in 2013-14 than in 2009-10 (**Figure 18**). In 2014 we reviewed the 2013-14 savings reported by the Efficiency and Reform Group. We concluded the methodology the Group used to calculate travel savings was reasonable.⁸

2.5 The CCS focuses on managing the price of travel. It aims to make a range of travel options available, at competitive prices. The CCS negotiates framework contracts and manages other initiatives such as the Crown Hotels Programme, which guarantees terms and prices at hotels across the UK. The CCS collects data on the overall demand for travel, but considers responsibility for managing travel expenditure to lie with departments.

2.6 The CCS previously collected data from travel management companies to review how departments performed against the aspirational targets in the Principles. It still gathers these data but it stopped analysing this during 2013-14 when it became clear there was little departmental appetite for comparing performance. The centre of government therefore does not have a detailed view of how travel procurement differs between departments, whether departments are getting value for money, and whether travel looks reasonable overall given wider cross-government initiatives (paragraph 2.1).

Figure 18

Volume of government travel in 2013-14 compared with 2009-10 baseline

	2013-14	2009-10
Single flights	561,641	512,639
Single rail journeys	3,108,023	2,481,785
Hotel room-nights	1,363,153	1,395,295
Source: Crown Commercial Service		

⁸ Comptroller and Auditor General, *The 2013-14 savings reported by the Efficiency and Reform Group*, Session 2014-15, HC 442, National Audit Office, July 2014.

Departmental oversight of government travel

2.7 Departments have delegated responsibility for controlling and overseeing their own travel expenditure. We would expect departments to have a sophisticated understanding of what level of travel they need to conduct their business. This should form the basis of departmental travel policies and controls over travel expenditure.

Departmental travel policies

2.8 Departments are responsible for creating travel policies setting out what type of travel is available to officials, and the circumstances when travel is acceptable. We analysed how 5 departments had set their travel policies. They told us that the Cabinet Office's Principles had influenced recent travel policy revisions, as did the Civil Service Employee Policy framework. However, the main consideration for revisions had been having to find efficiencies and reduce costs rather than managing overall demand. Some departments indicated that they needed flexibility, which prevented them from making travel policies too restrictive.

2.9 Although the status of the Principles is ambiguous, they remain the most recent guidance the centre of government has issued. We have therefore used them to review the travel policies at central government departments (**Figure 19** on pages 31 and 32). We aimed to assess how consistent travel policies are, and to highlight important areas of difference. Our review looked only at departmental travel policies. A number of departments include additional guidance on booking travel on their intranets. We have not referred to this additional guidance in our work.⁹

2.10 All departments include some of the Principles in their travel policies (see **Figure 20** on page 33). Departments differ in how far they have adopted the Principles. These differences partly reflect the different business needs and business models of the departments to which they apply.

2.11 Figure 19 has the full wording of the Principles and identifies those Principles most and least widely adopted by departments.

⁹ We omitted some of the Principles from our analysis as they were not all relevant to travel policies. For example, the Principles indicate that "It is recommended that departments set a monthly divisional travel budget to ensure that there is a close check kept on expenses." Although sensible, this relates to the organisation, not an individual traveller.

Figure 19 The Cabinet Office's Business Travel Policy Principles

Most	Principle
Only using taxis in London when it is absolutely necessary	0
Lowest cost rail and air travel should be the default choices	A and E
Hotels should be booked within a rate-cap	K
That all travel should be necessary	Ρ
Least	
Flying premium economy on flights over eight hours with senior management agreement	I
Where premium economy is unavailable, flying business class on flights over eight hours,	J

with senior management agreement

Principle	Full wording of Principle
А	Lowest cost option for travelling by rail should be the default option. Departments should monitor exceptions for not choosing lowest cost options.
В	Personnel should travel in standard class for all rail journeys, irrespective of grade, entitlement or distance.
С	Rail tickets purchased should have date and time restrictions where possible.
D	Rail tickets should be purchased in advance of travel, through departmental contracts.
E	Lowest cost option for air travel should be default option. Departments should monitor exceptions for not choosing lowest cost options.
F	All domestic air flights should be economy class without exception.
G	All air tickets to be purchased in advance of the date of travel.
Н	No public sector personnel should be travelling first class, irrespective of grade, entitlement or distance.
I	For international flights of over eight hours flying time, personnel should be provided with cost options for flying premium economy but may only be used with senior management agreement.
J	If premium economy is unavailable, the use of business class travel after eight hours flying time may only be used with senior management agreement and should not be deemed as an automatic choice irrespective of grade, entitlement or distance.
К	Departments should ensure a consistent rate cap is used and that personnel should not exceed this rate. Departments should report on exceptions to agreed rate caps.
L	Hotel rate cap, London: £115
М	Hotel rate cap, major cities: £75
Ν	Hotel rate cap, elsewhere: £70
0	The use of taxis in London should only be undertaken as a real necessity, e.g. not during normal working hours or where the underground is available etc.

Figure 19 continued

The Cabinet Office's Business Travel Policy Principles

.	
Principle	Full wording of Principle
Ρ	Travelling is kept to an absolute necessity, departments should ensure that personnel have the relevant access to (and consider using first) telephone conference and video conference facilities to minimise travel between different sites and departments.
Q	Cancellation rates for air, rail and hotels should be kept to an absolute minimum and departments should ensure personnel fully understand the cancellation clauses within the terms and conditions when purchasing tickets or booking hotel rooms.
R	Personnel should always purchase travel and accommodation through departmental travel management contracts to ensure that value for money and/or data benefits are being gained.
S	Personnel safety and well being should always be of paramount importance. If this affects policy principles being met then departments should report these exceptions as appropriate.
Т	When travel is required, limit the number of personnel attending from the same department.
U	When travelling for specific meetings, the start and finish times should be considered to allow travellers to maximise the benefits of off peak travel.
Note	
1 This is a	selection of 21 of the 26 Principles included in the Cabinat Office guidance that we consider to be most

1 This is a selection of 21 of the 26 Principles included in the Cabinet Office guidance that we consider to be most relevant to departmental travel policies. Also see footnote 9, page 30.

Source: Cabinet Office Business Travel Policy Principles

Variation in travel policies: hotel rate-caps

2.12 In line with the Principles, most departmental travel policies include a nightly rate-cap for hotel bookings in different locations. However, rate-caps vary by department, even for the same location: for example, \pounds 110 to \pounds 150 for hotels booked in London (**Figure 21** on page 34).

2.13 Departments told us that it was often challenging to find suitable hotel accommodation within the rate-cap, particularly in London. Some departments use a 'flexible' rate-cap to increase the choice available in any location. The system will allow accommodation bookings above the rate-cap within certain limits (for example, up to £20 above the policy rate-cap). Other departments encourage staff to seek accommodation in peripheral areas (including commuter hubs such as Croydon or Watford) and then travel onwards the following day (for example, into central London).

How far departmental travel policies reflect the Cabinet Office's Principles, November 2014

There is considerable variation in how far departmental travel polices reflect the Cabinet Office's Principles

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Department	BIS	CO	DCLG	DCMS	DECC	Defra	DfE	DfID	DfT	HD	DWP	FCO	HMRC	HMT	ОН	MoD	LoM

2 – Travel policy is less restrictive than the principle 4 – Travel policy is more restrictive than the principle 3 – Travel policy is exactly in line with the principle

0 – Travel policy does not refer to the principle

1 – Travel policy has no restrictions in relation to the principle

Notes

2

See Figure 19 for the full wording of the Principles coded A to U. -

While not incorporated within its departmental travel policy, for contractual reasons, BIS has introduced measures and a set of principles that prevent members of staff booking first-class travel and limit business-class flights to journeys in excess of 5 hours.

DCLG revised its travel policy in February 2015 so that it now addresses Principles C, Q, T and U. ന

Energy & Climate Change; Defra = Department for Environment, Food & Rural Affairs; DfE = Department for Education; DfT = Department for Transport; DfID = Department for International Development; DH = Department of Health; DWP = Department for Work & Pensions; FCO = Foreign & Commonwealth Office; HMRC = HM Revenue & Customs; HMT = HM Treasury; HO = Home Office; BIS = Department for Business, Innovation & Skills; CO = Cabinet Office; DCLG = Department for Communities and Local Government; DCMS = Department for Culture, Media & Sport; DECC = Department of MoD = Ministry of Defence; MoJ = Ministry of Justice. 4

Source: National Audit Office analysis of the Cabinet Office's Business Travel Policy Principles, and departmental travel policies

Hotel rate-caps by department

	London (£)	Major cities (£)	Elsewhere (£)
Cabinet Office Business Travel Policy Principles, 2011	115	75	70
BIS	125	85	85
CO	115	75	70
DCLG	110	85	85
DCMS	115	75	70
DECC	125	85	85
Defra	115	75	75
DfE	110	75	75
DflD	150	90	90
DfT	115	90	90
DH	115	85	85
DWP	130	80	80
FCO	-	-	-
HMRC	120	80 to 90	80
HMT	140	100	100
НО	125	90	90
MoD	65 to 135	63 to 105	35 to 100
MoJ	115	86	70

Notes

1 The FCO travel policy does not specify hotel rate-caps.

2 The Cabinet Office's Principles define London as within the M25. Major cities includes: Aberdeen, Belfast, Birmingham, Bristol, Cardiff, Coventry, Edinburgh, Glasgow, Harlow, Leeds, Liverpool, Manchester, Middlesbrough, Newcastle, Oxford, Portsmouth, Reading, Sheffield and York.

3 The MoD specifies a room rate for 368 different places within the UK, so the range indicates the minimum and maximum room rates within the Cabinet Office's three defined locations (London, major cities, and elsewhere).

4 BIS = Department for Business, Innovation & Skills; CO = Cabinet Office; DCLG = Department for Communities and Local Government; DCMS = Department for Culture, Media & Sport; DECC = Department of Energy & Climate Change; Defra = Department for Environment, Food & Rural Affairs; DfE = Department for Education; DfT = Department for Transport; DfID = Department for International Development; DH = Department of Health; DWP = Department for Work & Pensions; FCO = Foreign & Commonwealth Office; HMRC = HM Revenue & Customs; HMT = HM Treasury; HO = Home Office; MoD = Ministry of Defence; MoJ = Ministry of Justice.

Source: National Audit Office analysis of departmental travel policies

2.14 These approaches have different cost implications, which are comparable only if including the cost of the entire trip. Departments do not collect these data, so it is not possible to say which approach is more cost-effective. It is the view of the CCS that some departments may see the hotel rate caps as targets to be aimed for rather than absolute maximums, and that greater reduction in spend could be made by departments procuring the best value hotel available rather than the hotel nearest to the hotel cap. Our discussions with 5 departments suggest that departments can find it difficult to book hotel rooms within the rate caps, particularly in central London.

Variation in travel policies: non-standard class rail travel and non-economy class air travel

2.15 All departmental travel policies contain exceptions for officials to travel non-standard class by rail, and non-economy class by air. Often these exceptions are for staff disability, illness or security, but 13 policies also allow non-standard class travel by rail, and/or non-economy class travel by air, dependent on journey duration. Policies differ in how long a journey must be before officials can upgrade from standard or economy class (**Figure 22** overleaf).

2.16 A number of departments told us that they are contractually obliged to allow non-standard class travel by rail and non-economy class travel by air for officials with retained rights. This can be reflected in the relevant travel policy (for example, HM Revenue & Customs and the Ministry of Defence).¹⁰

2.17 Departmental travel policies also varied considerably in whether officials had to seek approval for non-standard class rail, or non-economy class air travel. Out of 17 departments, 11 require officials to seek manager approval for any non-standard class rail travel. Seven departments require manager approval for any non-economy class air travel.

2.18 Despite the Chief Secretary to the Treasury's announcement in May 2010 about public servants travelling first class, HM Treasury did not ban such travel (see paragraph 2.2). However, the Principles suggest that departmental travel policies should not allow first-class air or rail travel under any circumstances.

¹⁰ Such benefits reflect the terms of individual contractual obligations between employers and employees, which enshrine the rights guaranteed to those officials while they conduct their duties.

Right to non-standard class rail travel and non-economy class air travel, based on journey duration

13 departments allow non-standard class rail travel and non-economy class air travel based on journey duration

Department	For a journey over		Officials can travel Other non-standard class	First class
Rail travel				
Department for International Development	5 hours		Yes	
HM Revenue & Customs	2.5 or 5 hours ¹			Yes
HM Treasury	3 hours			Yes
Air travel		Premium economy	Business class	First class
Cabinet Office Business Travel Policy Principles	8 hours	Yes	Yes	No
Business, Innovation & Skills	5 hours	Yes	Yes	
Cabinet Office	5 hours	Yes	Yes	
Department for Environment, Food & Rural Affairs	10 hours		Yes	
Department for International Development	5 hours	Yes	Yes	
Department for Transport	8 hours	Yes	Yes	
Department of Health	4 hours		Yes	
Department for Work & Pensions	2.5 hours		Yes	
Foreign & Commonwealth Office	10 hours	Yes	Yes	
HM Revenue & Customs	2.5 hours ²	Yes	Yes	Yes
HM Treasury	6 hours	Yes	Yes	
Home Office	10 hours	Yes	Yes	
Ministry of Defence	4 hours	Yes	Yes	
Ministry of Justice	8 hours	Yes	Yes	

Notes

1 HM Revenue & Customs actively discourage first-class rail travel, but allow first-class travel for a single journey of more than 2.5 hours, or when total journey time (within a day) is more than 5 hours.

2 HM Revenue & Customs officials are only permitted first-class air and rail travel if there is no availability in other classes and travel at that time is essential.

3 While not incorporated within its departmental travel policy, for contractual reasons, the Department for Business, Innovation & Skills has introduced measures and a set of principles that prevent members of staff booking first-class travel and limit business-class flights to journeys in excess of 5 hours.

4 'Other non-standard class' rail refers to various classes of rail travel available outside the UK.

Source: National Audit Office analysis of departmental travel policies

2.19 All departmental travel policies contain exceptions so officials can make first-class rail journeys. However, departments have taken a much more varied approach to first-class air travel. Five departments allow first-class air travel, 4 do not mention first-class air travel in their policies, and 8 departments do not allow first-class air travel (**Figure 23**).

Figure 23

Departmental travel policies and first-class air travel

	Departments		
Travel policy allows first-class air travel in certain	Department for Communities and Local Government		
circumstances	Department for Culture, Media & Sport		
	HM Revenue & Customs		
	Home Office		
	Ministry of Justice		
Travel policy does not mention first-class air travel	Cabinet Office		
	Department for Environment, Food & Rural Affairs		
	Department for Education		
	Department for Transport		
Travel policy does not allow first-class air travel	Department for Business, Innovation & Skills		
	Department of Energy & Climate Change		
	Department for International Development		
	Department of Health		
	Department for Work & Pensions		
	Foreign & Commonwealth Office		
	HM Treasury		
	Ministry of Defence		

Notes

1 The circumstances under which officials can travel in first class may be determined by several factors including: their grade, journey duration, whether they need to work while travelling or are required to work immediately on arrival, or whether they have a disability.

2 While not incorporated within its departmental travel policy, for contractual reasons, the Department for Business, Innovation & Skills has introduced measures and a set of principles that prevent members of staff booking first-class travel and limit business-class flights to journeys in excess of 5 hours.

Source: National Audit Office analysis of departmental travel policies

How officials procure travel

2.20 Figure 24 shows the three most common ways central government officials book or pay for travel, which are as follows:

Travel management services company

Either using a self-service online portal, or by specifying travel requirements by email or phone. Travel management services are provided through framework contracts negotiated by the CCS.

Government procurement card or corporate credit card

In either case, the organisation is billed by the card company.¹¹

• Private funds

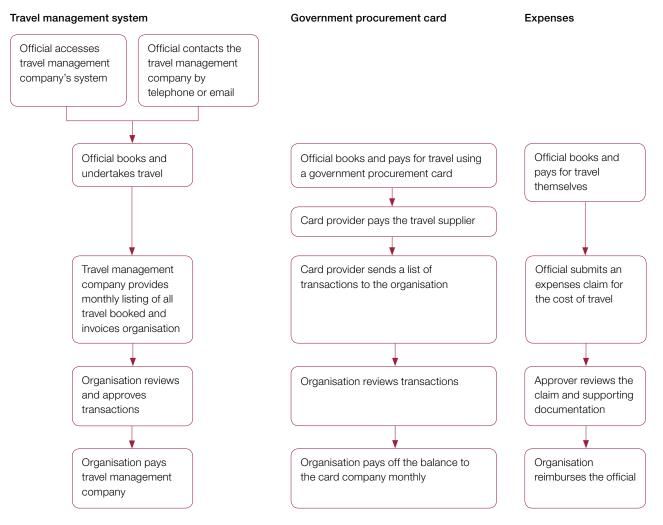
Officials reclaim these through an expenses system.

2.21 In 2013-14 central government spent £407 million on travel booked through travel management service companies. This is approximately 74% of all travel expenditure captured by Bravo Solutions (£546 million; see Figure 1). There is no complete data source for the whole of central government showing the value of travel purchased using government procurement cards or repaid to officials as expenses, although some departments do collect these data.

Advantages and disadvantages of booking or payment methods

2.22 Each of these three ways for booking travel has advantages and disadvantages (**Figure 25** on page 40). In any situation, the method chosen will be determined by several factors, including: organisational policy; destination; journey duration; when travel will be taken; and how much flexibility is required. Organisations should consider which method is most appropriate given their business needs, and encourage officials accordingly. The CCS recommends the adoption of a travel management services company/system in order to improve management and increase transparency of travel spend.

Three most common ways officials book or pay for travel



Note

1 There are other ways officials might book or pay for travel, depending on their employer. For example, the Department for International Development sometimes uses local travel agencies for overseas travel by its country office staff as no provider in the framework currently provides the necessary service. The Ministry of Defence sometimes uses its own aircraft to transport personnel.

Advantages and disadvantages of the three most common ways officials book or pay for travel

	Advantages	Disadvantages	
Travel management	Relatively light administrative burden	Travel options limited to those on the system	
services companies	Typically present many travel options	Fixed management fees, which can make low-value	
	Can prevent off-policy bookings through	bookings more expensive	
	automated controls	Concerns expressed by some customers that transaction-level data sometimes contain errors	
	Guarantee price reductions on standard fares		
	Provide transaction-level data for all booking activity		
	Can deliver emergency response/disaster recovery assistance		
Expenses systems	Convenient, especially if travel is at short	Relatively heavy administrative burden	
	notice or to less common destinations	Increased risk of fraud as process involves	
	Officials can book options not available	disbursing cash	
	through travel management systems	Relies on officials researching travel options	
		Challenging to prevent and identify off-policy travel claims	
Government	Relatively light administrative burden	Relies on officials researching travel options	
procurement card	Convenient, especially if travel is at short	No facility to prevent off-policy bookings Transaction-level expenditure data is unlikely to be detailed enough to identify off-policy travel Card use is normally restricted to a few staff members	
	notice or to less common destinations		
	Expenditure can be controlled by an expenditure cap		
	Officials can book options not available through the travel management systems	Stan members	

Source: National Audit Office

Travel expenditure risks and departmental controls

2.23 As with all government expenditure, travel generates financial risks. In 2012-13 £489 million of travel expenditure¹² represented only 0.3% of total central government expenditure on goods and services of £163 billion.¹³ However, officials normally must book their own travel, and autonomy increases the associated risk. Inappropriate travel bookings can cause financial loss, poor value for money and serious reputational damage. **Figure 26** identifies examples of typical travel expenditure risks.

12 Bravo Solutions recorded expenditure on travel in 2012-13 as £489 million.

13 HM Treasury, Whole of Government Accounts year ended 31 March 2013, Session 2014-15, HC 93, June 2014. This is the most recent whole of government accounts available.

Figure 26 Examples of typical travel expenditure risks

Access risks

Officials automatically gain access to book travel with no prior approval.

Officials access travel options not required to perform their duties.

Government procurement cards have travel category enabled when officials do not require this to perform their duties.

Access rights for officials leaving their organisation are not removed promptly.

Booking risks

Officials do not comply with travel policies when booking or paying for travel.

Travel policies contain ambiguous guidance open to interpretation.

Officials book personal travel, or claim personal travel costs.

Officials do not book cost-effective travel.

Officials do not cancel travel no longer required.

Bookings are not subject to sufficient scrutiny for budget holders to be assured that travel is necessary and reasonable.

Payment risks

Travel management companies and government procurement card suppliers invoice incorrectly.

Expense claims are submitted claiming incorrect amounts.

Expense claims are authorised without appropriate consideration by approvers.

Source: National Audit Office

2.24 Organisations should design and implement expenditure controls to mitigate these risks. To design an optimal set of controls, organisations must understand their business needs, and the specific risks they face. This analysis should underpin a selection of preventative, detective, payment and deterrent controls chosen to mitigate these risks.

Preventative controls

Designed to prevent inappropriate travel bookings before they are made.

Detective controls

Designed to identify inappropriate travel bookings after they have been made.

Payment controls

Designed to ensure that departments pay suppliers the right amount at the right time.

Deterrent controls

Designed to dissuade officials from making inappropriate travel bookings.

2.25 Figures 32 to 35 in Appendix Two show the types of preventative, detective, payment and deterrent controls that might reasonably be associated with central government travel expenditure.

Travel expenditure controls at 10 organisations

2.26 We reviewed controls over travel expenditure at 10 central government organisations (**Figure 27**): 5 departments and 5 other central government organisations (3 executive non-departmental public bodies, and 2 executive agencies).

2.27 We compared travel expenditure controls for travel management service providers' systems, government procurement cards and expenses systems against a hypothetical set of controls intended to mitigate against the access, booking and payment risks identified in Figure 26.

2.28 Our results identified consistency and variation among the 10 organisations reviewed (see Appendix Two, Figures 36 to 38). We consider these similarities and differences for each of the three ways of booking travel in turn (see **Figures 28** to **30**). We do not conclude on whether controls in place are appropriate and proportionate to the business needs of each organisation. Nor do we suggest that organisations should implement all these controls.

Figure 27

Travel expenditure controls reviewed at 5 departments and 5 other central government organisations

Departments	Other central government organisations
Cabinet Office	Education Funding Agency
Department for International Development	Homes & Communities Agency
Department for Transport	National Portrait Gallery
Department for Work & Pensions	National Institute for Health and Care Excellence
Ministry of Defence	HM Passport Office

Note

Fieldwork at HM Passport Office was conducted during August 2014. In October the Home Secretary announced that HM Passport Office would cease to be an executive agency of the Home Office, and become part of the department.

Travel management service providers' systems: similarities and differences in spending controls at 5 departments and 5 other central government organisations

Control type	Similarities	Differences
	All or most organisations	Organisations vary in how far they
Preventative	confirm officials' status before granting access.	use automated hard controls to prevent off-policy bookings:
	confirm whether officials need booker, or booker and traveller access.	 2 organisations prevent all off-policy bookings: Department for Work & Pensions and HM Passport Office.
	require a budget code for bookings.	 6 prevent some off-policy bookings (typically relating to hotel costs): Cabinet Office, Department for International Development,
	highlight travel options that do not comply with policy, and require an explanation if selected.	Department for Transport, Education Funding Agency, Homes & Communities Agency and National Institute for Health and
	do not restrict the value of a travel transaction.	Care Excellence.
		 2 prevent no off-policy bookings: Ministry of Defence and National Portrait Gallery.
Detective	provide travel data to business units.	report travel data to senior managers: Cabinet Office, Department for International Development, Department for Work & Pensions, Ministry of Defence, Education Funding Agency, Homes & Communities Agency, National Institute for Health and Care Excellence, HM Passport Office. conduct checks to identify off-policy and/or suspicious bookings: Cabinet Office, Department for Work & Pensions, Ministry of Defence, Homes & Communities Agency, National Portrait Gallery,
		National Institute for Health and Care Excellence.
Payment	attempt to reconcile travel management company invoices against transaction-level data, but timing differences between the travel bookings and invoices can make this difficult. The Department for International Development does not receive invoices from their travel management provider, but receives statements and detailed transaction-level breakdowns of its travel spending from its payment provider.	
Deterrent	make officials aware of the travel policy, including sanctions and penalties for misusing public funds, before being granted access to the travel management system.	

Travel management service providers' systems

2.29 All 10 organisations have call-off contracts from the CCS's framework contract for travel services. In 2013-14, £156.2 million of travel at the 10 organisations was booked through the Redfern and Hogg-Robinson Group travel management companies; 58% of this was booked online, using a web-based portal provided by the contractor. Organisations could also book travel by emailing or calling the contractor.

2.30 All 10 organisations had similar deterrent controls, with a policy that stated sanctions for misusing travel. These controls would apply equally to travel booked through travel management systems, the government procurement card, or claimed back as expenses.

Travel expenses

2.31 All 10 organisations allow officials to claim legitimate travel costs incurred while conducting their duties (**Figure 29**). At the 10 organisations sampled, expense claims accounted for a minority of travel costs (typically less than 10% of total travel expenditure).

Government procurement card

2.32 The number of government procurement cards (or corporate credit cards) has decreased during the current Parliament.¹⁴ These cards were introduced in 1997 for low-value, high-volume transactions. Each card has categories which organisations can enable or disable, based on the cardholder's business needs. In our sample, 9 organisations allowed staff to pay for travel using such a card.

2.33 With the decline in the number of cards and the rise in accessible travel management company services, use of such cards for travel is now low. In 2013-14 at only one of the organisations we sampled (the National Portrait Gallery) did card use account for most travel expenditure. At the remaining organisations it accounted for less than 10%.

¹⁴ Four out of 5 departments included in our review used government procurement cards with the travel category enabled. In 2014 these 4 departments used approximately 11,100 cards, of which approximately 10,500 were held by the Ministry of Defence. When we reviewed usage of these cards in 2012, the number held by these 4 departments was 14,858. See Comptroller and Auditor General, *The Government Procurement Card*, Session 2010-2012, HC 1828, National Audit Office, March 2012.

Expenses systems: similarities and differences in travel expenditure controls at 5 departments and 5 other central government organisations

Control type	Similarities	Differences
	All or most organisations	Organisations vary in
Preventative	require a budget code for	how far claimants and approvers must justify off-policy travel claims:
	expense claims	• 7 organisations require claimants to justify off-policy claims: Cabinet Office, Department for Work & Pensions, Ministry of Defence, Education Funding Agency, Homes & Communities Agency, National Institute for Health and Care Excellence, HM Passport Office.
		• 5 organisations require approvers to justify off-policy claims: Cabinet Office, Department for Work & Pensions, Homes & Communities Agency, National Portrait Gallery, National Institute for Health and Care Excellence. However, the Cabinet Office lacks the resources to ensure this is done consistently.
Detective	categorise expenditure by code	how far they regularly test samples of expense claims:
	(to identify travel)	• 4 performed regular sample testing: Cabinet Office, Department for International Development, Homes & Communities Agency, National Institute for Health and Care Excellence.
		 3 performed occasional sample testing, seeking off-policy claims, Department for Transport, Department for Work & Pensions, National Portrait Gallery.
Payment		how expense claims are authorised:
		• 6 organisations require line manager approval by default: Department for Work & Pensions, Department for International Development, Department for Transport, ¹ Homes & Communities Agency, National Portrait Gallery, National Institute for Health and Care Excellence. The Homes & Communities Agency also requires secondary approval for some claims.
		• 2 organisations allow senior officials to self-certify claims:
		HM Passport Office.
		Cabinet Office.
		1 organisation allows all officials to self-certify claims:
		Education Funding Agency.
Deterrent	make officials aware of the organisation's travel policy, including sanctions and penalties for misusing public funds	

Note

1 On 2 June 2014, the Department for Transport implemented a policy requiring all expense claims to be approved by a line manager, by default.

2.34 Controls relating to cards are more consistent than controls for the other methods of booking or paying for travel. This is partly because of government work to strengthen oversight (**Figure 30**).¹⁵

Variation in controls and assurance

2.35 Variation in controls is inevitable, and partly reflects some departments' complex travel requirements. For example, the Ministry of Defence may have to move officials and equipment to remote locations at short notice. The lack of automated controls in its travel management system is deliberate, and intended to make travel easier. It is challenging to design automated controls that recognise (and prevent) undesirable travel, but allow unusual but legitimate travel.

2.36 It may sometimes be desirable to have few preventative controls. However, this must be offset by effective detective controls to identify off-policy and suspicious bookings. The Homes & Communities Agency analyses monthly travel data, identifies high-risk bookings and reports data to senior managers. Budget holders can then be held to account, which encourages active enforcement of the travel policy. Organisations that do not make any detective checks get limited assurance that travel expenditure is reasonable and is for genuine business need. In the worst case, such organisations risk unintentionally funding inappropriate or fraudulent travel.

Figure 30

Government procurement card (and other corporate credit cards): similarities in travel expenditure controls at 5 departments and 5 other central government organisations

Control type	Similarities
	All or most organisations
Preventative	restrict access to cards.
	conduct regular assessments to ensure officials with cards still require them to conduct their duties.
	set individual transaction limits, and monthly expenditure limits.
Detective	conduct regular sample testing of card transactions (6 out of 10).
Payment	require cardholders to conduct monthly reconciliations of transaction logs and card statements.
Deterrent	publish clear sanctions and penalties for card misuse.
	publish transactions of more than $\$500$ online (departments did so consistently, but only 2 out of 5 other organisations did).

¹⁵ HM Treasury, Government responses on the First to the Fourth and on the Sixth to the Tenth Reports from the Committee of Public Accounts: Session 2012-13, Cm 8467, November 2012.

Transaction testing

2.37 As well as reviewing controls at 10 organisations, we tested 10 travel transactions from each. Most transactions we tested were through a travel management company. However, 2 were also made using a government procurement card and 5 were claims for expenses. We tested whether each transaction met the relevant organisational travel policy and, if not, confirmed whether there was a reasonable explanation for non-compliance.

2.38 Transaction testing revealed several potentially inappropriate transactions. For example, at the Ministry of Defence we tested an economy-class return flight from London to Brunei costing more than £21,000. Further investigation revealed this to be a group booking for 14 travellers. However, this was unclear from monthly transaction summary data the travel management company provided. Inability to easily distinguish group bookings from such summary information will skew value-based stratified or spot-checking. It reduces the likelihood of identifying expensive tickets for solo travellers. Group bookings explain some journeys reported in the press in 2013.¹⁶ Of 100 transactions tested, 4 did not comply with the relevant organisational travel policy (**Figure 31** overleaf).

2.39 Our testing highlights the importance of controls over travel expenditure. All 4 transactions should have been identified as questionable and further scrutinised, but none were. In 3 cases this was because detective controls were in place but did not function properly, and in 1 case the relevant organisation had no detective controls.¹⁷ For the 3 cases, the organisations conducted monthly reviews of travel bookings. However, they did not identify these to be off-policy transactions. The transaction at the Department for Work & Pensions may not have been off-policy. The data available to the Department lacked detail to identify the traveller's identity, and therefore whether they were eligible for first-class rail travel because of personal circumstances. Detailed management information is necessary for detective controls to work properly.

2.40 It is neither practical nor desirable for organisations to block officials from making off-policy travel bookings. Travel policies cannot cover every conceivable travel requirement. Organisations therefore need processes to identify and investigate unusual travel expenditure, to confirm their eligibility and get assurance over such expenditure. Our investigation considered a small number of travel bookings, but found a number of off-policy bookings. This suggests that several central government organisations need to strengthen their controls.

16 See also 'What this investigation is about', page 4.

17 In these cases, the 3 organisations told us that they reviewed travel transaction listings to identify and follow up off-policy bookings. However, checks failed to identify the 3 transactions in our sample.

Figure 31 Testing identified 4 transactions non-compliant with organisational travel policies, with no satisfactory explanation

Organisation	Booking	Cost (£)	Issue	Control failure (see Figures 36–38)
Cabinet Office	3 first-class rail tickets from London to Crewe	1,092	The Cabinet Office travel policy only allows first class rail travel if it is cheaper than standard class, but there is a senior management override that can be exercised in exceptional circumstances. The Department told us that these tickets were approved via that route on this occasion, even though they were not the cheapest available, because the officials concerned were travelling on ministerial business.	Failure of control 1i
Department for Work & Pensions	First-class rail travel from Blackpool to London	335	First-class travel is permitted only if the traveller has a disability. The department could not provide any evidence that the traveller had a disability in this instance.	Failure of control 1i
Education Funding Agency	First-class rail ticket from Manchester Piccadilly to London	23	Travel policy permits first-class travel if the ticket is cheaper than the cheapest available standard-class ticket, but evidence must be retained to support this. The Agency told us that this was the cheapest ticket for this journey, but could not provide the necessary evidence in this instance.	Absence of control 1i
National Portrait Gallery	First-class rail ticket from London to York	104	Travel policy permits first-class travel for journeys normally of more than 12 hours' duration, and with the authorisation of a budget holder. This journey would not have exceeded the duration threshold, nor was any authorisation provided.	Failure of control 1i
Total value of non-compliant transactions	actions	1,584		
Total value of all 100 transactions tested		113,3141		
Proportion by value of non-compliant transactions	ant transactions	1.4%		
Notes 1 This includes a Euro currency transaction converted at the midmarket rate offered on the date of travel. 2 The £104 transaction was first class for only one leg of a return journey.	tion converted at the midmarket rat or only one leg of a return journey.	e offered on tl	ie date of travel.	

National Audit Office policy and performance on travel expenditure

2.41 As part of our investigation, we performed the same testing on the National Audit Office (the NAO) as the 10 organisations outlined in Figure 27. In 2013-14 the NAO spent approximately £1.65 million on a combination of domestic and international travel. The NAO publishes information relating to travel expenditure in its annual reports and accounts, and expenditure incurred by the leadership team and board members on its website. We tested 10 travel transactions with a total value of £7,070. All were compliant with the NAO's travel policy, and none suggested controls were absent or had not functioned as intended.

2.42 The NAO's travel policy is consistent with many of the Cabinet Office's Business Travel Policy Principles; however, no government department has a travel policy which is exactly in line with the Principles and the NAO's policy likewise is in some respects less restrictive than the Principles. For example, hotel rate caps are set higher than those in the Principles and, during 2013-14, the NAO's policy allowed first class rail in certain circumstances. Compared to averages across government, the NAO therefore booked a higher proportion of first class rail tickets and our hotel costs were above average, particularly in London. The cost of hotels booked in London was on average £135 (£113 exclusive of VAT for consistency with Figure 13) and £79 outside London (£66 exclusive of VAT for consistency with Figures 14 and 15).

2.43 In terms of first class rail travel the NAO travel policy permitted first class travel where: the Director has approved the booking; the seats have been pre-booked; the employee is required to work during the journey; and where the travel time is expected to be in excess of two and a half hours for a single trip. In 2013-14, the NAO booked 93.7% of rail tickets in economy class. The policy was set because we have a requirement for a significant amount of travel between Newcastle and London. This is required for meetings with government departments and in Parliament, as well as internal NAO commitments.

2.44 In response to the comparison we have made of our travel policy to those across government, we have revisited our policy, taking account of our business requirements and have revised it in the following respects:

- to remove any provision for first class rail travel; and
- to reduce the hotel rate cap for London to £125.

Appendix One

Our investigative approach

Scope

- **1** We examined:
- data to show the public how much the government spends on travel, and how officials travel;
- how the Cabinet Office and HM Treasury have tried to control travel expenditure across central government;
- travel policies at 17 central government departments; and
- controls over travel expenditure at 10 central government organisations, and performed transaction testing to assess how these work.

2 Our investigation considers central government travel expenditure between 2010-11 and 2013-14. It focuses on expenditure for rail and air travel, and hotel bookings.

Methods

3 In examining these points, we drew on several evidence sources.

4 We **interviewed officials** from the Cabinet Office and the Crown Commercial Service to identify the role of the centre of government in relation to:

- creating and mandating framework contracts for travel services;
- collaborating with other departments to produce guidance for setting travel policies; and
- reviewing travel data collated and analysed by the Crown Commercial Service.

5 We **analysed data** held by Bravo Solutions and the Crown Commercial Service to calculate:

- central government travel expenditure from 2010-11 to 2013-14;
- travel expenditure by departmental group; and
- travel expenditure through the Crown Commercial Service travel management framework contracts.

6 We reviewed departmental reports and accounts from 2010-11 to 2013-14 to assess the completeness and comparability of publicly-available travel expenditure data. We reviewed departmental travel policies for consistency, using the Cabinet Office's Business Travel Policy Principles as a framework.

7 We conducted work programmes at 10 central government organisations.Work programmes consisted of three elements:

- walk-throughs of how officials book travel;
- transaction testing; and
- interviews covering travel expenditure and policy from the perspective of finance, procurement, internal audit and human resources.

Departments	Other central government organisations
Cabinet Office	Education Funding Agency
Department for International Development	Homes & Communities Agency
Department for Transport	National Portrait Gallery
Department for Work & Pensions	National Institute for Health and Care Excellence
Ministry of Defence	HM Passport Office

8 The work programme was conducted with 5 departments and 5 other central government organisations:

- 9 These 10 organisations were selected to include a variety of:
- public functions;
- volumes of travel;
- travel expenditure; and
- types (modes) of travel required.

10 We **reviewed 10 travel transactions at each organisation** (100 transactions in total). Each sample included the most expensive flight and train ticket booked through the travel management company, along with a selection of other tickets purchased through the travel management company. Where government procurement card and expenses claims were also available, we selected a maximum of 2 transactions from these sources.

11 We compared transactions against relevant travel policies and, where these were in breach, sought to identify why the transaction had proceeded. This might have been because controls were absent or had failed to work as intended.

- 12 We did online research, including:
- media articles relating to the data released by the Cabinet Office in 2011; and
- rail and airfare analysis, for example to calculate achievable savings if advance rail tickets are purchased instead of anytime tickets.

Appendix Two

Preventative, detective, payment and deterrent controls

 The following Figures 32, 33, 34 and 35 represent, respectively, the types of preventative, detective, payment and deterrent controls that might reasonably be associated with central government travel expenditure. The subsequent Figures 36, 37 and 38, indicate those controls we identified at 10 central government organisations.

2 These figures reflect the types of controls we would expect to see in a functioning travel expenditure control environment. They do not include every control present in each of the organisations we reviewed.

Preventative controls

Preventative controls	Controls selected to mitigate against			Control grid references
	Access risks	Booking risks	Payment risks	
Access rights should be approved by line managers/ finance/ human resources	Yes			1a, 2a, 3b
Access rights should be reviewed regularly, particularly when an official's circumstances change	Yes			1a, 3c
Officials should have the ability to book travel for themselves, others, or both as appropriate	Yes			1b
Officials should have access only to modes of travel that they need to perform their duties	Yes			1c
Officials should have travel expenditure limits commensurate with their responsibilities		Yes	Yes	1d, 3a
All travel expenditure should be associated with a travel budget or cost centre		Yes		1e, 2d, 3f
Automated controls should be used to minimise off- policy bookings		Yes		1f
Travel management systems should show a full range of cost options for any journey		Yes		1g
Expense claims should categorise transactions, and be supported by travel documentation			Yes	2b, 2c
All off-policy travel should be justified by the booker and approved by their line manager		Yes	Yes	1h, 2e
Source: National Audit Office				

Detective controls

Detective controls	Controls relating to		Controls grid references	
	Access risks	Booking risks	Payment risks	
Reconciliations between government procurement card statements and transaction logs should be performed by cardholders and reviewed by finance teams			Yes	Зf
Finance teams should interrogate transaction-level data to identify, investigate and review off-policy and suspicious bookings		Yes	Yes	1i, 2h
Finance teams should conduct random, stratified and risk-based testing on a sample of transactions		Yes	Yes	1j, 2f, 3d
Finance teams should provide detailed reports to budget managers so they can hold officials to account		Yes		1l, 3e
Finance teams should compare a sample of travel bookings and claims relating to travel on the same day to identify duplicate claims			Yes	2g
Summary data should be reported upwards to provide a travel expenditure overview, and to hold budget managers to account		Yes		1k, 3e
Internal audit should complete reports on travel expenditure for senior managers and audit and risk committees. How regular these reports are should be commensurate to the risks posed by the organisation's travel expenditure	Yes	Yes	Yes	1m
Source: National Audit Office				

Payment controls

Payment controls	Controls relating to		Controls grid references	
	Access risks	Booking risks	Payment risks	
Reconciliation of travel management company invoices to transaction-level data			Yes	1n
Expense claims should be approved at an appropriate level before funds are released			Yes	2i
Reviewer should review all the supporting documentation for expense claims to ensure it is adequate			Yes	2j
Reconciliations between government procurement card statements and transaction logs should be performed by cardholders and reviewed by finance teams			Yes	Зf
Source: National Audit Office				

Deterrent controls

Deterrent controls	Controls relating to		Controls grid references	
	Access risks	Booking risks	Payment risks	
Organisations should publish a clear and comprehensive travel policy, and ensure that officials are familiar with it. The policy should set out clear sanctions for the misuse of public money in relation to travel, including disciplinary action		Yes		1o, 2k, 3h
Finance teams should remove government procurement cards for non-adherence to travel policy	Yes			3g
Organisations should publish government procurement card transactions online (transactions of more than £500)		Yes		Зі
Source: National Audit Office				

Travel management system controls at 10 central government organisations

1

Preventative controls over access

- a Access rights should be approved by line managers/finance/human resources and reviewed periodically.
- **b** Between them, these three groups should ensure that officials are given the appropriate type of booking access to the travel mangement system.
- c Between them, these three groups should ensure that officials are given access only to the travel categories they need (for example, rail but not air).
- d Appropriate spend limits (by individual transaction or by time period) should be built into each official's access rights.1

Preventative controls over bookings

- e Officials should provide a job code or cost centre for all bookings.
- f There should be automated controls preventing officials from making off-policy bookings.
- g The travel management system should clearly present all cost options for the journey.²
- h Off-policy bookings should only be possible with the pre-approval of a line manager, or the finance team. The approver should provide an explanation as to why an off-policy bookings is appropriate/necessary in such an instance.

Detective controls

- i Review these data to identify suspicious and/or off-policy bookings, and confirm whether or not these were appropriate.
- j Regularly conduct both random and stratified testing on a sample of transactions to ensure that there was a legitimate business need to travel, and that travel was in-policy.
- k Report up: a summary of the data to the finance director/senior management team and business units, including analyses of any organisation-wide and unit-wide issues. This should be used by senior management to hold budget holders to account for travel expenditure incurred against their budgets.
- I Report horizontally/down: provide full details of all relevant transactions to budget holders. Budget holders should provide a signed return confirming that they are satisfied that all bookings were made for genuine business purposes.
- m Internal audit should report on travel expenditure to senior managers, and audit and risk committees.

Payment controls

n Invoices issued by the travel management company should be reconciled back to the transaction-level data.

Deterrent controls

o Officials should be made aware of the organisation's travel policy, including sanctions and penalties for misusing public funds, before being granted access to the travel management system.

Notes

- 1 Control 1d: The current Redfern and Hogg-Robinson travel management systems are unable to set limits on individual transactions, so none of the 10 case study organisations were able to implement this control.
- 2 Control 1g: The current Redfern and Hogg-Robinson travel management systems do not always show a full range of cost options for different modes of transport on a given journey, and therefore none of the 10 organisations can fully implement this control.
- 3 CO = Cabinet Office; DfID = Department for International Development; DfT = Department for Transport; DWP = Department for Work & Pensions; MoD = Ministry of Defence; EFA = Education Funding Agency; HCA = Homes & Communities Agency; NPG = National Portrait Gallery; NICE = National Institute for Health & Care Excellence; HMPO = HM Passport Office

со	DfID	DfT	DWP	MoD	EFA	HCA	NPG	NICE	НМРО
Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Yes	Yes	Partial	Yes	Yes	Yes	Yes	Yes	Yes	No
No	No	No	No	No	No	No	No	Yes	No
No	No	No	No	No	No	No	No	No	No
Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Partial	Partial	Partial	Yes	No	Partial	Partial	No	Partial	Yes
Partial	Partial	Partial	Partial	Partial	Partial	Partial	Partial	Partial	Partial
Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes
Yes	No	No	Yes	Yes	No	Yes	Yes	Yes	No
Yes No	No No	No No	Yes No	Yes No	No No	Yes Yes	Yes No	Yes Partial	No No
No	No	No	No	No	No	Yes	No	Partial	No
No Yes	No Yes	No No	No Yes	No Yes	No Yes	Yes Yes	No Partial	Partial Yes	No Yes
No Yes Partial	No Yes Partial	No No Partial	No Yes Yes	No Yes Yes	No Yes No	Yes Yes Yes	No Partial Yes	Partial Yes Partial	No Yes Partial

Expenses controls at 10 central government organisations

N	1

- Access rights should be approved by line managers/finance/ Preventative controls സ
 - human resources and reviewed periodically
- All expenditure reclaimed should be categorised م
- All expenditure should be supported by appropriate documentation. с
 - All expenditure reclaimed should be linked to a travel budget or cost centre. σ
- Where the claim is for off-policy travel, the claimant should provide an explanation as to why this was necessary or appropriate. Ð

Detective controls

- random and/or risk-based approach (for example, they could focus Finance should regularly check a sample of claims, either using a on higher-value claims, or on claims with spend categorised as 'miscellaneous'). <u>ч</u>
- nobody has claimed expenses for tickets also booked through the bookings through the travel management system (to ensure that Finance should compare a sample of travel claims against travel management system). D
- Finance should review all off-policy bookings. _

Payment controls

- Expenses should be approved at the appropriate level line managers for lower-value claims, and more senior grades for higher-value and/or off-policy claims.
- Approvers should review all supporting documentation, and if this is missing or inadequate, they must satisfy themselves that the claim is genuine/appropriate, and provide an explanation.

Deterrent controls

Officials should be made aware of the organisation's travel policy, including sanctions and penalties for misusing public funds. ×

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- racity and appropriateness of travel claims. Detective and payment controls at the MoD are carried out by the 7 Top-Level Budget holder organisations (TLBs). Processes vary between the TLBs, so it is not possible to provide a single N
 - CO = Cabinet Office; DifD = Department for International Development; DfT = Department for Transport; DWP = Department for Work & Pensions; MoD = Ministry of Defence; EFA = Education Funding Agency; HCA = Homes & Communities Agency; NPG = National Portrait Gallery; NICE = National Institute for Health & Care Excellence; HMPO = HM Passport Office. assessment for the MoD as a whole. ന

Source: National Audit Office

ОЧМН	Yes	Yes	Partial	Yes	Yes
NICE	Yes	Yes	Partial	Yes	Yes
NPG	Yes	No	Yes	Yes	No
НСА	Yes	Yes	Yes	Yes	Yes
EFA	Yes	Yes	٥N	Yes	Yes
MoD	Yes	Yes	Yes	Yes	Yes
DWP	Yes	Yes	Yes	Yes	Yes
DfT	Yes	Yes	Partial	Yes	Partial
DfID	Yes	Yes	Yes	Yes	Partial
S	Yes	Yes	Partial	Yes	Yes

g	No	No	
Yes	Partial	Partial	
Partial	0 N	Partial	
Yes	Partial	Yes	
° Z	0 N	No	
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Varie Tl	Varies by TLB	Varies by TLB	
Varie TI	No Varie TL	Yes Varies TLF	
Partial	Q	Yes	

Partial	Partial	
Yes	Yes	
Yes	Yes	
Partial	Yes	
No	No	
Varies by TLB	Varies by TLB	
о Х	Yes	
No	Partial	
No	Yes Partial	

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

60 Investigation into government travel expenditur	60	D Investigation into	government travel	expenditure
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Government procurement card controls at 10 central government organisations

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Preventative controls

- a Officials should have authorised expenditure limits for both single transactions and monthly expenditure which, if exceeded, would cause the transaction to be declined.
- b Organisations should restrict who can become a cardholder, with mandatory training for cardholders and card administrators.
- Organisations should conduct regular assessments of whether individual cards are still required to meet business needs.

Detective controls

- d Organisations should conduct spot-checks on a sample of transactions.
- Organisations should review management information to monitor travel spend by individuals and business units.

Payment controls

f Organisations should require monthly reconciliations between transaction logs and card statements, which are then reviewed by an approver.

Deterrent controls

- g Organistions should remove cards from officials for repeated low-level non-adherence to the policy.
- h Organisations should have clear sanctions for misuse, including the threat of disciplinary action in the case of serious misuse.
- Organisations should publish transactions with a value of more than E500 online.

НМРО	Yes	Yes	Yes	
NICE	Yes	Yes	Yes	
NPG	Yes	Yes	Yes	
НСА	Yes	Yes	Yes	
EFA	No information	No information	No information	
MoD	Yes	Yes	Yes	
DWP	N/A	N/A	N/A	
DfT	Yes	Yes	Yes	
DfID	Yes	Yes	Yes	
8				

Yes	Yes
Yes	Yes
Partial	Yes
Yes	Yes
No	No
Yes	Yes
N/A	N/A
Partial	No
	-
Yes	Partial

Yes

Yes

Yes

۶

Yes

A/A

Yes

Yes

Partial	No	No
Yes	Yes	Yes
Yes	Yes	No
Yes	Yes	Yes
No information	Yes	Yes
Yes	Yes	Yes
N/A	N/A	N/A
Yes	Yes	Yes
Yes	Yes	Yes
Yes	Yes	Yes

Notes

- On 7 July 2011 the Prime Minister wrote to cabinet ministers to say that government was working with purchase and payment card providers to provide a consistent method of reporting government procurement card spend data for transactions above £500 in value, so that this information is available for publication on departmental websites from the end of September 2011.
- CO = Cabinet Office; DfID = Department for International Development; DfT = Department for Transport; DWP = Department for Work & Pensions; MoD = Ministry of Defence; EFA = Education Funding Agency; HCA = Homes & Communities Agency; NPG = National Portrait Gallery; NICE = National Institute for Health & Care Excellence; HMPO = HM Passport Office 2

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