



Specifications for Pre-Paid Card

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1. Purpose of this document

- 1.1. To define the mandatory and desirable requirements which must be met by the Pre-Paid Card vendors
- 1.2. For Tenderers to respond and comment in the box provided on their ability to comply with each requirement
- 1.3. This document lists the current requirements for Pre-Paid Card schemes/programmes for Brent Council. The following services areas have been consulted and their requirements incorporated within this document:

1.4. Direct Payments – Adults (DPA)

- 1.4.1. Brent Council has 33 clients using the current prepaid scheme. The new scheme will be rolled out to the remainder of the approximately 370 clients, who receive Direct Payments from the council currently that is paid into a separate bank account on a monthly basis to purchase care in accordance with their Care Package
- 1.4.2. The monthly value of payments to these 400 clients is approximately £430,000.00. On average a client makes 3 – 5 transaction per month
- 1.4.3. Card may be used abroad
- 1.4.4. There are approximately 600 other clients that may be moved onto Direct Payments once a successful program exists for them to use
- 1.4.5. A Pre-Paid card program is required that will:
 - 1.4.5.1. Enable the council to reduce the paperwork requests from clients
 - 1.4.5.2. Reduce the amount of paperwork the clients need to send in
 - 1.4.5.3. Enable the council to concentrate efforts on clients who have not sent in paperwork and may need further assistance or money recovered
 - 1.4.5.4. Provide a tried and tested means for clients to pay for their care as well as pay HMRC and other statutory payments clients are required to make themselves
 - 1.4.5.5. Provide a card in the name of the client
 - 1.4.5.6. Enable clients that are required to make contribution towards their care package to add funds to the card account
 - 1.4.5.7. Ensure carers (who are employed directly by the client) can receive payment to their bank account
 - 1.4.5.8. Provide alternative card facilities for clients that are unable to manage their card account themselves, temporarily or permanently
 - 1.4.5.9. Ensure the client can manage the card account on-line, by telephone (able to speak to a person not just automated service) or both 24/7/365
 - 1.4.5.10. Provide suitable support to vulnerable and/or disabled people who still wish to retain independence
 - 1.4.5.11. Cash withdrawal and cash back is not allowed for this program

- 1.4.5.12. Some clients have speech impediments or English is not their first language
- 1.4.5.13. All usage and issuance charges will be borne by the council not the card holder

1.5. Direct Payments – Children and Families (DPCF)

- 1.5.1. The council currently has 110 children entitled to receive Direct Payments to purchase care directly to a bank account. There may be further children who may convert to Direct Payment via prepaid cards once a successful program is in place. The majority of the requirements for this program are the same as for Adult Direct Payments above
- 1.5.2. The card will be in the name of the parent or guardian. The monthly value of payments to these 110 clients is £60,000 per month. On average a client makes 3 – 5 transaction per month
- 1.5.3. A Pre-Paid card program is required that will:
 - 1.5.3.1. Enable the council to reduce the paperwork requests from clients
 - 1.5.3.2. Reduce the amount of paperwork the clients need to send in
 - 1.5.3.3. Enable the council to concentrate efforts on clients who have not sent in paperwork and may need further assistance or money recovered
 - 1.5.3.4. Provide a tried and tested means for clients to pay for their care as well as pay HMRC and other statutory payments clients are required to make themselves
 - 1.5.3.5. Provide a card in the name of the client's parent or guardian
 - 1.5.3.6. Enable clients that are required to make contribution towards their care package to add funds to the card account
 - 1.5.3.7. Ensure carers (who are employed directly by the client) can receive payment to their bank account
 - 1.5.3.8. Provide additional card facilities for a second parent or guardian, temporarily or permanently
 - 1.5.3.9. Ensure the client's parent or guardian can manage the card account on-line, by telephone or both 24/7/365
 - 1.5.3.10. Provide suitable support to cardholders who may be vulnerable and/or disabled themselves whilst caring for children
 - 1.5.3.11. English may not be the client's first language
 - 1.5.3.12. All usage and issuance charges will be borne by the council not the card holder

1.6. Asylum Seekers (Unaccompanied Children) and Section 17 (AS)

- 1.6.1. The council is required to provide financial support to unaccompanied minors who are Asylum Seekers and to children who are leaving care. There may be other children services where financial support is required under emergency circumstances
- 1.6.2. Many of these card holders will be under 18 years of age
- 1.6.3. Personalised and non- personalised cards will be required for this program
- 1.6.4. Payments to this client group are weekly, fortnightly or one off payments
- 1.6.5. Access to the cardholder website by the program administrator for this client group is not required

- 1.6.6. ATM withdrawal is permitted, transaction costs will be borne by the card holder
- 1.6.7. The ability for the cardholder to top up the card from sources other than Brent Council may be required
- 1.6.8. Merchant blocking may be required to prevent use on unsuitable websites or inappropriate outlets

1.7. Corporate Staff Cards (CSC)

- 1.7.1.1. This program is for council staff who need the ability to either draw cash to give to clients or make purchases while in the company of a client, or pay for expenses where a GPC card is not suitable (i.e. the name of a social worker travelling abroad to visit a fostered child, or a youth worker taking a group on an outing is not a GPC holder or needs cash to pay for a taxi etc)
- 1.7.1.2. There are currently 77 Corporate Staff cards in issue, three of which are used to buy Season Tickets by staff once a Season Ticket Loan application has been approved. This number may go up by another 45 cards
- 1.7.1.3. Staff Cards are normally topped up monthly but ad-hoc top ups may occur
- 1.7.1.4. Cash withdrawal at an ATM is permitted. All transaction fees are to be borne by the card at the point of use
- 1.7.1.5. Cashback at retail outlets is not permitted
- 1.7.1.6. Card to bank transactions is not required for this program
- 1.7.1.7. Access to client website is required by cardholder and program administration staff

2. Proof of Concept

- 2.1. In the context of this project, the proof of concept may be scaled down to a proof of technology if suitable reference sites are made available to the project team, otherwise, the following must be provided:

2.1.1. Access to websites

- 2.1.1.1. Access must be provided to both, the administrator website and to the client website. The URLs must be the ones which the Services Users and the Council will use after go-live, i.e., these should not be 'special' URLs set up for the Proof of Concept

URLs:

W x 3

2.1.2. Access to Call Centre

- 2.1.2.1. This must be using the telephone number which the Services Users and the Council will use after go-live, i.e., these should not be 'special' numbers set up for the Proof of Concept

Call Centre Numbers:

W x 3

2.2. Issuance of Cards

- 2.2.1. The project team must be able to issue multiple cards
- 2.2.2. It must be possible to issue a minimum of 15 cards for the Proof of Concept, of which:
 - 2.2.2.1. Three must be DPA client cards only
 - 2.2.2.2. Three DPA client cards with Companion cards
 - 2.2.2.3. Three DPA Companion Card only
 - 2.2.2.4. Three Instant Issue cards (AS)
 - 2.2.2.5. Three Instant Issue cards (CSC)

W x 3

2.3. Card Cancellations

- 2.3.1. The Project Team must be able to completely cancel one card of each scheme under 2.2.1
- 2.3.2. The Project Team must be able to test for reporting lost/stolen cards. Lost/stolen cards must be reissued within 5 working days. The requirements must conform to 12.15

W x 2

2.4. Suspend / Block Access

- 2.4.1. The Project Team must be able to temporarily suspend then unsuspend one card of each scheme under 2.2.1
- 2.4.2. The Project Team must be able to block categories of merchants which cannot then be used to complete purchases
- 2.4.3. The Project Team must be able unblock the categories of merchants in 2.4.2

W x 3

2.5. User IDs

- 2.5.1. The Project Team must be able to add, modify and delete users who access the administrator website
- 2.5.2. The Project Team must be able to make real purchases (acting as a client) on-line, by phone, at a shop and be able to do a bill payment on-line and via the phone using the Vendors call centre/customer services contact numbers
- 2.5.3. The Project Team must be able to re-assign a card (non-personalised)

W x 3

3. Reference Site

- 3.1. The vendor will make arrangements for the project team to visit a minimum of two reference sites where other local authorities are already using the vendor's Pre-Paid card system for distributing their Direct Payments and/or any other relevant card programme
- 3.2. The vendor will make arrangements for the project team to be able to meet with the Project Manager or the Project Lead of such reference sites

W x 1

Please provide the name of the reference sites and contact details

4. Pilot Project

- 4.1. The project team will run up to 4 pilot projects each selecting approximately 10 of the existing SUs¹
- 4.2. These pilot projects will run for approximately 6 weeks
- 4.3. During the pilot projects, the vendor will provide information on all contact made by the Pilot Project's users with itself. This data will be used to evaluate the performance of the vendor
- 4.4. Vendors will address any areas where performance did not reach acceptable standards and these will be re-tested prior to sign off of each project

W x 3

5. Support

- 5.1. Pilot Project
 - 5.1.1. The vendor will provide support for all technical and procedural issues during the pilot project
 - 5.1.2. The vendor will also hold weekly conference calls with the project team during this phase
 - 5.1.3. The vendor will provide a main contact and a backup contact for all support issues

W x 3

Please provide names and roles

¹ Service User

5.2. Ongoing

- 5.2.1. The vendor will provide ongoing support for all technical and procedural issues
- 5.2.2. The vendor will also hold quarterly meetings at the Council offices with the programme lead officers and overall project manager
- 5.2.3. The vendor will provide a main contact and a backup contact for all support issues

Please set out the hierarchy and define roles

W x 3

6. Publicity Material

- 6.1. The vendor must be able to supply sufficient publicity material to the Council which the Council will distribute to its' SUs and Staff members. This material should cover topics such as:
 - 6.1.1. Ease of use of the Pre-Paid cards
 - 6.1.2. Benefits
 - 6.1.3. Support available from the vendor
 - 6.1.4. Contacts (Helpline, Escalation, Website, Email, etc)

Please provide a sample and indicate what aspects can be personalised to the Council and/or Program

W x 1

- 6.2. It is envisaged that the following quantities of publicity material will be required:
 - 6.2.1. Initial Rollout
 - 6.2.1.1. 500 sets for SUs; this will be general in content
 - 6.2.1.2. 200 sets for Council Staff; this will be detailed in content
 - 6.2.2. Ongoing (per annum)
 - 6.2.2.1. 50 sets for SUs; this will be general in content
 - 6.2.2.2. 25 sets for Council Staff; this will be detailed in content

W x 1

- 6.2.3. In addition to the quantities supplied in 6.2.1 and 6.2.2, the vendor will provide the same as a PDF file
- 6.2.4. Cost
 - 6.2.4.1. Please include cost in the Price Schedule

W x 1

7. Presentations to Council Employees

- 7.1. The vendor will be able to provide 5 presentations at the Council offices. Of these:
- 7.1.1. One will be the initial presentation to the Project Team at the tender stage. This will be to approximately 10 persons and will include a demonstration of the system from the Administrator as well as the card holder experience
 - 7.1.2. Short listed tenderers will give a second presentation to the Project Board and other Senior Management. This will be to approximately 20 persons. A brief will be provided in the invitation

W x 1

- 7.1.3. The successful tenderer will present to Council employees spread over a period of 3 weeks:
 - 7.1.3.1. On Monday, Wednesday and Friday at a time decided by the project team
 - 7.1.3.2. The total number of attendees will not exceed 100 per session

W x 1

8. Presentations to Service Users (SU's) at Launch Events

- 8.1. The successful tenderer will provide 5 presentations to SUs at the Council offices spread over a period of 3 weeks, on Monday, Wednesday and Friday at a time decided by the project team and may include 1 evening session – please note attendees may include users of the existing Pre-Paid Scheme as well as Councillors
- 8.2. The total number of attendees will not exceed 100 per session

W x 1

9. Training for Council Employees

- 9.1. The successful vendor will provide a training session for Council employees who will use the administrator websites

- 9.2. The training can be in a classroom environment at the Council offices or via Microsoft NetMeeting
- 9.3. The training sessions will be held during the week at a date and time decided by the project team
- 9.4. The total number of attendees expected will not exceed 35

W x 1

10. User Manuals for Council Administrators

- 10.1. The vendor will provide User Manuals which the Council staff will refer to when using the administrator website. The vendor will update the User Manual after agreement with the Programme Administrators as and when website upgrades or changes occur
- 10.2. The total number of such manuals required will be 35 at general rollout and also at every major upgrade to the administrator
- 10.3. The vendor will provide 10.1 in PDF format too

W x 1

11. User Manuals for Cardholders and Companion Cardholders (SUs)

- 11.1. The vendor will provide User Manuals which the SUs will be able to refer to when using the client website.
- 11.2. The total number of such manuals required will be 550 at general rollout.
- 11.3. Another 550 will be required per annum or a cumulative number required at every major upgrade to the client website

W x 1

12. Requirements

- 12.1. The Council funds must be held within the territorial limits of the United Kingdom

Pass / Fail

- 12.2. The card must be reusable by the Service User

W x 2

12.3. The card must be a 'chip & PIN' card

W x 3

12.4. The card must re-loadable by the LBB². It should be possible to load the card multiple times in any given period

W x 3
Please state the life of each type of card and maximum number of re-loads per card type

12.5. Cash Withdrawals

- 12.5.1. It must be possible to block ATM³ cash withdrawals by groups. These groups could be based on individual projects within LBB or even groups within each project, or if possible on a card by card basis
- 12.5.2. It must be possible to block 'cash-back' from retail and other outlets by groups. These groups could be based on individual projects within LBB or even groups within each project

W x 3

12.6. It must **not be** possible for the SU to overdraw on the Pre-Paid card

W x 3

12.7. Fee

- 12.7.1. All agreed fees (transactional or otherwise) must be charged as separate items to the Council, unless otherwise specified by individual projects
- 12.7.2. All fees (transactional or otherwise) must be charged monthly in arrears to the Council; Settlement can be by Direct Debit per scheme or by invoice per scheme with payment terms of 30 days, unless otherwise specified by individual projects

W x 3

12.8. SUs should be able to carry out the following functions using the vendor's website over the Internet and the vendor's call centre using a standard touch-tone telephone or cellphone:

- 12.8.1. Card Activation and Card Registration
- 12.8.2. Report lost or stolen cards
- 12.8.3. Balance queries

² London Borough of Brent

³ Automated Teller Machine

- 12.8.4. Transaction queries
- 12.8.5. Change of details
- 12.8.6. Transfer funds from card to any valid bank account in the United Kingdom (regular payments as well as one off payments)

Please indicate any additional facilities

W x 3

- 12.9. Requirement 12.8 should be available 24 hours a day and every day of the year (24/7/365)

Please indicate arrangements during Bank Holidays and weekends, maintenance downtime arrangements and contingency arrangements

W x 3

- 12.10. Two reference fields each of a minimum of 18 characters should be provided on the client payment screen. This information must be transmitted as part of the transferring funds via BACS to the beneficiary

Please include details regarding remittance advice facilities for BACS payments

W x 3

- 12.11. Where some functions listed at 12.8 are via an automated telephone service an option must exist for the SU to speak to a person trained to handles calls from vulnerable and disabled cardholders and cardholders whose first language is not English

W x 3

- 12.12. SUs should also be able to carry out the following functions using the vendor's call centre using a standard touch-tone telephone or cellphone:

- 12.12.1. Change Telephone PIN⁴ number
- 12.12.2. Password Resets for website access

Please confirm that details of how this is done will be covered in the user manuals and what type of security questions the card holder will be asked

W x 3

⁴ Personal Identification Number

- 12.13. It should be possible for the SU to set-up alternative identifications means (secret question / answer) for identification in case password is forgotten and the CSR⁵ needs to authenticate the SU

W x 3

Please detail the process for the call centre and the cardholder if the cardholder forgets or gets the answers wrong and how/when the Program Administrator would be able to intervene

- 12.14. Paper statements, at least monthly, must be available for cardholders who do not have access to the internet. Detail any cost for statements in the Pricing Schedules

W x 1

Please provide a sample if possible and provide details of any additional detail that can be included.

- 12.15. New and/or replacement cards and/or PINs must be delivered either to the LBB or to the SU (as set out in the programme set up) within 5 working days from when the request is made by phone or via the website. Confirmation of despatch is required

W x 2

Please include details of process if cards/PINs are lost in the mail

- 12.16. The transaction information on the card holder paper statements, website and telephone transaction query must consist of:
- 12.16.1. Date of Transaction
 - 12.16.2. Date of Posting
 - 12.16.3. Recipient (Trading Name OR bank account number, sort code and name of recipient)
 - 12.16.4. Amount
 - 12.16.5. Reference (i.e. invoice number, description of service/goods) as entered on-line or taken via the vendors call centre

W x 3

⁵ Customer Services Representative

- 12.17. LBB should be able to carry out the following functions using the vendor's administrator website, which should be available 24 hours a day and every day of the year (24/7/365):
- 12.17.1. Request the issue of Cards and/or Companion Cards
 - 12.17.2. Load funds onto individual cards (template upload as well as individual loads)
 - 12.17.3. Transfer funds from one card to another or return the funds to the Funding Account
 - 12.17.4. Add and administer users to be able to access the vendor's administrator website
 - 12.17.5. Obtain SU activity reports per card and per scheme/programme
 - 12.17.6. Obtain reports on Card status (balance, date last used, suspended, cancelled etc)
 - 12.17.7. Obtain reports on the programme funding account transactions and balance, period specified up to at least the previous 15 months
 - 12.17.8. Each transaction line detail should provide adequate information for audit purposes and be in a format that is easy to understand

W x 3

- 12.18. The SU activity reports must contain the following information:
- 12.18.1. 10 digit reference number which has been selected by the LBB to identify the SU
 - 12.18.2. Date of Transaction
 - 12.18.3. Date of Posting
 - 12.18.4. Amount
 - 12.18.5. Trading Name of recipient (in case of a merchant transaction)
 - 12.18.6. Two reference fields / narrative fields each a minimum of 18 alphanumeric characters in length

W x 3

Please confirm reports are exportable to Microsoft Excel as well as PDF

- 12.19. It must be possible for the SU to populate the fields in 12.10 using the vendor's website or by speaking to a CSR

W x 3

- 12.20. It must be possible for the LBB to either temporarily block a card or to be able to instruct the vendor to temporarily block the card

W x 3

Please state if a temporary block will automatically be removed and give the maximum period that would be termed 'temporary'

- 12.21. It must be possible to use the card at outlets (on-line, phone payments and CHIP and PIN) which accept either VISA and/or MASTERCARD

W x 3

Please state if cards can be used at fuel filling station Pay at Pump

- 12.22. Must be possible to set up templates for regular payments. It must be possible to alter the payment amount and the reference / narrative field in these templates

W x 2

Please state if there is a maximum number of templates for regular payments

- 12.23. CSRs must be able to handle telephone calls in English

W x 3

Please confirm which country the call centre is in

- 12.24. CSRs must be able to handle calls from customers not familiar with using cards or websites, whose first language is not English, have speech impediments or other disabilities and or are otherwise vulnerable. Some clients may present with one or more of these needs

W x 3

- 12.25. The card may be re-loadable by the SU via cash, bank transfer and debit/credit card either as one off arrangement or regular payments. It should be possible to load the card multiple times in any given period

W x 1

- 12.26. Timed callback facility should be available. This is where if the SU wishes to speak to a CSR over the telephone and the CSR is busy, the SU should be able to leave their contact details and time when the CSR calls back the SU

Please state the maximum time for a call back to occur

W x 1

- 12.27. It must be possible for the SU to opt-in or opt-out from receiving paper statements. It should be possible for the SU to do so by contacting the vendor's CSR

W x 1

- 12.28. A desirable requirement will be that instead of 12.18.6, there are three reference fields / narrative fields each a minimum of 18 alpha-numeric characters in length

Please include any costs in the Pricing Schedule

W x 1

- 12.29. The SU can set up a low balance trigger which can alert either via SMS or email or both

W x 1

- 12.30. Despite 12.5 it must be possible to use the ATM to check balance or to modify the PIN number

W x 1

- 12.31. Typetalk is honoured by the vendor

W x 2

- 12.32. Vendor's website for SUs is British Sign Language enabled

W x 2

- 12.33. CSRs can handle telephone calls in Western & Eastern European, Middle-Eastern and South-East Asian languages

Please list all languages

W x 2

- 12.34. Data from the vendor system exportable in Microsoft Excel format to enable analysis and in a format suitable for import into Oracle GL, with VAT reports that meet HM Customs and Excise acceptance for transactions to appropriate level 2 and 3 supplier

W x 3

13. Funding

- 13.1. Each scheme/programme will have a unique funding account for funding and loading associated cards

Please describe the process of funding including the invoice process, timetable for cleared funds, transferring money between programs if required and returning money to the council (i.e. at the end of the contract period)

W x 3

- 13.2. Funding will be made by LBB to the unique scheme/programme funding account via BACS for normal funding and CHAPS for emergency funding

W x 2

14. Implementation

- 14.1. The vendor will provide the implementation plan and facilitate the implementation of each scheme/programme to ensure a smooth transition from our existing vendor

Please provide a sample plan from presentation stage to Service Users through to sign off

W x 3

15. Performance Management

- 15.1. A Service Level Agreement will be agreed and form the basis of quarterly review meetings
- 15.2. What penalties do you consider fair for failure to meet agreed performance standards?
- 15.3. What is the escalation process for poor performance?

Please provide a sample SLA

W x 3

16. Miscellaneous Questions

16.1. Is your card issuer Mastercard, Visa or both?

W x 1

16.2. Can each card be loaded with up to £20,000 per month, every month?

W x 2

16.3. What is the maximum withdrawal limit per withdrawal and per day at an ATM?

W x 1

16.4. Which bank will the funding account be held by?

W x 1

16.5. What will the name of the bank account be?

W x 1

16.6. In the event that your company went into administration how would the council get access to its money?

W x 3

16.7. What is the maximum amount that can be held on each of the funding accounts?

W x 2

16.8. How many system administrators can we have?

W x 2

16.9. Will each have an individual user name and password?

W x 2

16.10. What is your password security format requirement?

W x 1

16.11. How often does the website access prompt passwords to be changed?
Client and Administrators

W x 2

16.12. Can the system cope with one/two overall program administrator(s) who has access to all programs and program leads who can only access their programs?

W x 1

- 16.13. Give details of the types of card programs you offer and which type you believe will meet each of the programs listed above. i.e. personalised named cards, non personalised cards, single use cards

	W x 2
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- 16.14. Given the volumes, frequencies and values of loads at the beginning of this document please complete the pricing schedule stating the per card rate, any tiered rate for increased numbers or values, set up fees etc. Please include any items we are not aware of. Any costs not shown in the pricing document will not be paid unless they are new services (i.e. not in existence in any form at the start of the contract period)

- 16.14.1. Please state if the tariffs are fixed for the period of the contract or increase with RPI each year

	W x 1
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- 16.15. Have you ever found that a cardholder has been able to withdraw cash or spend more than the credit balance on the card? If you know that it has happened and you cannot prevent it in future, how would you propose you reimburse the council for any amount that is overdrawn and not deduct it from any top-up amounts by the council?

	W x 2
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- 16.16. Provide a sample of each type of prepaid card as it would arrive to a cardholder or the council. Indicate what elements of a standard letter can be changed without attracting a charge at the time of set up and cost of changes after program in place. Please include this detail in the pricing schedule

	W x 1
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- 16.17. Who can change the delivery address for new and replacement card?

	W x 2
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- 16.18. If the card or PIN does not arrive within agreed timescales (as per SLA) what emergency delivery options are in place? Please confirm that you will bear the cost of emergency delivery where SLA has not been met

	W x 3
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- 16.19. At the end of the contract, in the event that your do not retain the business, please explain how the balance on cards and in the funding accounts will be returned to the council (including timescales)

	W x 3
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- 16.20. Are there any charges if the card is not used, if so how much and after what period of inactivity? Please include these costs in the Pricing Schedule

	W x 3
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- 16.21. At the end of the card life what happens to any balance on the card
- 16.21.1. if the card is to be replaced
- 16.21.2. if the card is not to be replaced? Explain each process and circumstances of returning money on cards to the council for each program where different

	W x 3
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- 16.22. Card balances that include money paid onto the card by other than the council will be addressed as part of the legal agreement between the council and the client. Do you have any concerns in this regard?

	W x 1
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- 16.23. Please describe the process of allocating funds to each scheme on receipt of payment that may not contain the scheme reference for the destination of fund or your receive funds for more than one program as a lump sum

	W x 1
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- 16.24. Are calls made to the CSR recorded? If so how long are the recordings kept for and who has access to them?

	W x 3
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- 16.25. Is there any requirement to install any software on either the cardholders PC or council network/PC's? If so please provide full specification

	W x 1
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- 16.26. What fraud prevention/detection activity do you have in place?

	W x 3
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- 16.27. If other Local Authorities or public bodies wish to contract with you, would you accept them on the same terms as this contract (based on very minor changes to requirements)?

	W x 1
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- 16.28. Please provide a sample Service Level Agreement. The SLA should include corrective action timescales, penalties for repeated failures to meet agreed service standards and escalation process.

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- 16.29. Please provide the Programme Implementation Plan. Direct Payments will have priority but all existing programs will migrate followed by any additional programs identified and agreed.

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