FRAUD PREVENTION GROUP

PROCUREMENT FRAUD THEMES AND CONTROL MEASURES

CONTENTS

1. INTRODUCTION

2. GENERAL PROCUREMENT ISSUES

2.1 Senior staff influencing junior staff involved in a selection process
2.2 Procurement staff being presented with ‘done deals’
2.3 Contracts signed by member of staff not authorised
2.4 Diversion of Funds
2.5 Bogus Vendor
2.6 Sale of confidential information
2.7 Fraudulent Use of one time vendor
2.8 Lack of business interests registers (and monitoring)
2.9 Lack of awareness of risks from all in the process
2.10 No anti-fraud culture in Procurement departments
2.11 Contract awarded prior to specifications being fully agreed
2.12 Manipulation of preferred bidders
2.13 No formal contract in place

3. TENDER PROCESS

3.1 Prices reworked
3.2 Value of contract disaggregated to circumvent EU Regulations
3.3 Inappropriate high value purchase by Senior Staff Member
3.4 Inappropriate use of Single Tender Action (STA)

4. RELATIONSHIPS WITH CONTRACTORS

4.1 Directors members of particular associations (e.g. golf clubs)
4.2 Members of staff relationships with potential suppliers
4.3 Conflict of interest/abuse of position
5. USE AND ASSOCIATED RISKS OF USING CONSULTANTS

5.1 Employment of Senior Consultants who influence the process
5.2 Consultants ‘project hopping’
5.3 Consultants engaged for extensive periods (in excess of 3 years)
5.4 Consultants re-deployed – contrived tender process
5.5 Inflated/fraudulent claims by consultants

6. POST CONTRACT AND CONTRACT MANAGEMENT ISSUES

6.1 Contract extended beyond the authorised value and term.
6.2 Lack of on-going contract and supplier management
6.3 Inflated costs
6.4 Invoices not monitored
6.5 Lack of monitoring of contracts
6.6 Purchase of goods for personal use
6.7 Fraudulent travel costs
6.8 Manipulation of costs.
1. INTRODUCTION

Fraud can manifest itself in many ways, but the procurement process presents a common risk area across almost all organisations, large or small.

This document has drawn on the experience of a number of organisations seeking to share and disseminate good practice. The Procurement Fraud themes outlined are accompanied by a menu of control measures that may assist in mitigating the risk of such events occurring.

Where there is evidence or suspicion of collusion, then other corrupt practice may feature as part of the fraudulent act. Accordingly, any investigation should be cognisant of the possibility of offences under the Bribery Act 2010.

In seeking to provide another tool in our efforts to deter, detect and minimise the impact of Procurement Fraud, this collection of good practice is commended to you as a dynamic document, enabling new fraud themes to be added, alongside a range of controls.

2. ACKNOWLEDGEMENT

The London Public Sector Counter Fraud Partnership would like to thank the following for their contributions to this good practice guidance:

The BBC
London Borough of Camden
London Borough of Tower Hamlets
NHS
Audit Commission
Mayor’s Office for Policing and Crime
National Fraud Authority
London Borough of Newham
## 2.1 Senior staff influencing junior staff involved in a selection process

**Control Measures**

Single contracted recruitment management service or limited number of approved recruitment agencies for contractor recruitment  
Established clear recruitment / tender process with competitive interviews, two or more interviewers, rules on the composition of tender panels, scoring of bids; strict selection criteria against Job description  
Training in fair selection procedures for interviewing managers  
Board evaluation templates with scoring returned to HR/ Procurement  
Team therefore open to review with formal feedback to delegates  
HR/ Procurement Team involved in recruitment to ensure fairness  
Independent member on panel.  
All communications provided through HR and/or Procurement.

## 2.2 Procurement staff being sidelined during initial commercial consultations and subsequently being presented with a ‘done deal.’

**Control Measures**

All contracts subject to competitive tendering process  
The Procurement Team appropriately trained and remunerated, providing input and advice during consultation  
Contracts require joint technical/commercial appraisal so cannot be presented with ‘done deal’  
All contract awards to be ratified via Procurement Line Manager/Contracts Board/Committee depending on value  
Standard procurement templates/ tools for transparency and consistency

## 2.3 Contracts signed by member of staff not authorised to do so

**Control Measures**

All contracts or at set thresholds receive procurement sign-off or other agreed level of authorisation with contract/category manager appointed  
Procurement Scheme of Delegation for Contracts sign-off  
Formalised process for approval in Procurement Standard Operating Procedures to include fraud / bribery risk assessment  
Corporate approval process independent from Business Area.  
Finance hold and maintain a register of authorised signatories
### 2.4 Diversion of funds; the risk that a member of staff diverts funds through the set up of a non-existent Supplier/Freelancer

**Control Measures**

- Centralised vendor maintenance team for creation/reviewing new vendor set-up to ensure segregation of duties with validation of vendor set up
- Purchasing permission levels to raise purchase orders
- Realistic and manageable financial authority limits
- Strict controls over authority to set up new suppliers
- Internal Audit review Creditor Payments annually with periodic / scheduled validity checks of existing and new vendors
- A whistle blowing procedure is in place.

### 2.5 Bogus vendor; the risk that an individual authorises the set up of a bogus vendor and raises and authorises a purchase order (excluding One Time Vendor)

**Control Measures**

- Procedures in place to ensure segregation of duties to raise and authorise a requisition e.g.
  - Centralised vendor maintenance team
  - System access controlled segregation of duties
  - Scheme of delegation financial approval limits control
- Appropriate financial limits on purchase order authorisation
- Local financial review by cost centre
- Local and/or central review of vendor list i.e. Internal Audit review annually with periodic / scheduled validity checks of existing and new vendors
- Limited permissions in finance and procurement to set up suppliers

### 2.6 Sale of confidential information; the risk that a member of staff discloses information on bids to other contract bidders

**Control Measures**

- Clear Procurement and Financial procedures and instruction for retention / disclosure tender information with Information Security Policy in place
- Procurement are focal point for tendering process at every stage
- Central retention / controlled access to bids / commercially sensitive information with audit trail. Formal templates used for supplier debriefs
- During a tender all paperwork locked away – clear desk policy
- Secure portals for electronic tendering, bids sealed until tender closes
- Tendering information limited to selection panel
## 2.7 Fraudulent use of One Time Vendor; the risk that staff use the One Time Vendor process e.g. cheques sent to a bogus vendor/settlement of personal expenses

### Control Measures

- Regular review of One-Time Vendors
- Purchase Order authorised before payment made (not on receipt of invoice)
- Review by cost centre of expenses
- No ability for One-time Vendor creation without reference to central Procurement department to establish segregation of duty
- All payments authorised according to the Scheme of Delegation / authorised signatory list.
- The main control against this is management scrutiny of budget reports
- Segregation of duties Accounts Payable set up new vendors for procurement department

## 2.8 Lack of business interest registers (examples of there being no proper constraints, with no monitoring, which could lead to ‘contract creep’ where organisation gets further contracts on the back of being awarded previous contracts and thus further checks not done).

### Control Measures

- Contract monitoring programme.
- Contract managers appointed for independent oversight and reporting
- Risk registers and issue logs in place
- Gifts & Hospitality policy / register
- Declaration of interests protocol

## 2.9 Lack of awareness of risks and issues from all in the process; managers/procurement staff

### Control Measures

- Awareness training (targeted in certain areas of the business according to activity)
- Fraud Control Officers embedded in various locations across the business
- Risk registers and issue logs in place and are regularly reviewed/ updated
- Regular internal audit reviews which highlight risks and recommendations
2.10 No anti-fraud culture in procurement departments – no due diligence/risk registers

**Control Measures**

- Champions within Procurement charged with educating and monitoring to advance good practice and ensure understanding of fraud risk and control measures
- Corporate Procurement Policy in place to reflect fraud risks within processes
- All departments maintain risk registers, which are centrally monitored by the Assurance Department or similar
- Fraud Management Framework / Policy /Guidelines in place
- Bribery Policy /Guidelines in place

2.11 Contract awarded prior to specifications being fully agreed and developed; meaning organisation becomes responsible for additional development and training expenses.

**Control Measures**

- All projects subject to business case including financial spend forecast.
- All Contracts Awards subject to scrutiny from Scheme of Delegation approvers to ensure VFM and right solution has been sought
- All contracts awarded should be subject to a formal authorisation process, in accordance with the organisations Scheme of Delegation
- Training included as part of the contract terms;
- Contract specification defined prior to being let;
- Ensure there is a contract sponsor who is also member of Senior Management
- Contract sponsor should be required to report progress to a committee that is made up of members and senior executives.
- Comply with approved tendering procedures.
- Procurement Policy – Business case to secure additional resource funding
- No contract award may be made for which funding is not identified
- In the event that no source of funding (in part or in total) has been identified the Director of Finance must authorise proceeding with the procurement.
- All procurement above set limits e.g. £250,000 is subject to completion of a Tollgate document, reviewed and approved by a stringent governance process prior to procurement
- Completion of an OJC Gateway Process is required to evidence implementation of recommendations identified at an earlier stage and achievement against set objectives including recommendation on award.
2.12 Manipulation of Preferred Bidders List

Control Measures

Preferred bidders/ short list of sub-contractors should be maintained by a Central Procurement Team.
Preferred bidder list is a control measure bidders having had prior approval
All contracts subject to competition via CompeteFor/OJEU/Framework Award process
Contracts can be let within framework agreements, with an effective selection process. Anything other than an open competition would need justification within an approval process
Standing Financial Instructions and procurement policy in place
Establish evaluation panel

2.13 Sometimes no formal contracts in place despite the organisation paying vendors regularly substantial amounts of money

Control Measures

Standing Financial Instructions in place
Non-compliant spend (spend without contract) monitored on a monthly basis with corrective action plan with Business/Procurement lead
No Purchase Order, No Pay policy
Audit reviews of spend/ contracts
Periodic reviews by Procurement and Internal Audit with a view to identifying large spend ‘off contract’
Regular spend analysis undertaken to address spend categories with key stakeholders / budget holders
Category Management structure in place to spend portfolio
Supplier set up is controlled and monitored by Category Management team
3. TENDER PROCESS

### 3.1 Prices ‘reworked’ to enable the ‘successful’ bidder to move up the proposal list following initial bidding

**Control Measures**

- Use open tendering process;
- No reworking of tenders allowed unless sufficient evidence can be provided that a genuine mistake was made. (In such circumstances other tenders to be informed)
- Partners in outsourced functions required, via contract, to adopt policies of organisation
- All evaluation criteria presented prior to tender submissions to maintain fairness and transparency in the procurement process
- Suppliers have access to debriefs and tender feedback
- Adequate segregation of duties (i.e. no single officer with overall control of supplier selection, tendering and approval)
- Tender registration forms clearly highlight initial bid price. Any post tender negotiation should be carried out in conjunction with procurement team
- There is a set ‘scoring’ system for financial and non-financial elements of bids. Any reworking would have to be applied to all tenders
- Standing Financial Instructions - Formal tenders are sealed in the bidding process
- All tenders to be treated as confidential and should be retained for inspection
- All procurement above EU threshold is managed through Corporate Procurement including e-tendering system to ensure fair and transparent process
- Clear whistleblowing and independent procedures

### 3.2 Value of contract disaggregated to circumvent Organisation/EU regulations

**Control Measures**

- Annual (or more frequent) review by query to determine split payments (query parameters based upon risk exposure) whether pan-organisation or by Division/Department
- Contract Usage/Spend monitored through monthly compliance reports
- Reports on supplier spend by Contract/Department/Organisation
- The contract tendering process should be based on the total value of the contract
- Effective monitoring of budget adjustments
- Procurement involved in process from the outset
- Procurement policy implicit that there should be no disaggregation of purchases simply to avoid the application of the EU rules.
3.3 Inappropriate High Value Purchase; the risk that a senior individual makes a large value purchase e.g. £0.5m for an unauthorised purpose in which they approve the vendor account.

Control Measures

Top 100 suppliers high value reviewed by Procurement on a quarterly basis
For urgent payments financial director authority
Standard review of cost centres
No individual with authority over set limit i.e. £25k able to authorise lowering their own threshold
For raising and authorising purchase order sideways authorities removed
Non-approved suppliers blocked centrally
Periodic review of One-Time Vendors
Business case required for new goods/works/services
Segregation of duties in business case approval and procurement process
Separate financial budget approvals
Separate procurement route approval
Audit reviews of high value payments
A whistle blowing procedure is in place
System with financial hierarchy built into approval process so only authorised people can approve this spend
Authorisation limits require anything over a set limit to be signed off by the Chief Executive
Use a purchasing system which prevents requisitioning and approving by the same person

3.4 Inappropriate use of Single Tender Action (STA)

Control Measures

Single Tender Action (STA) only considered in exceptional cases
All STA’s require legitimate reasoning and approval
All STA’s subject to formalised approval and reporting process through Procurement Services and panel
Central procurement team involved in the tendering process
All tender exercises are conducted according to a corporate procurement policy
All tender waivers are sent to the audit committee and must be approved by relevant Director/Director of Finance.
All single tenders must be signed off by either DoF (under set limit e.g. £250K) or Chief Executive. Also, annual report required to the Audit Committee of all single tenders
All waivers regarding tendering procedures or OJEU Tenders must be reported monthly to Audit Committee.
Mini-tollgates to record and capture all procurement below EU threshold.
### 4. RELATIONSHIPS WITH CONTRACTORS

#### 4.1 Directors of contract company members of particular associations (e.g. golf society) along with members of staff (Conflict of Interest)

**Control Measures**

- Gifts and hospitality register circulated/published
- Conflicts of Interests recorded at contract sourcing stage
- All contracts above £1m scrutinised by Corporate Boards
- Declarations of interest form signed by all involved in the process.
- Undeclared interests that subsequently come to light should be treated as a breach of contract and a disciplinary offence
- A whistle blowing policy communicated to all staff
- Register of interests held centrally.
- Conflict of interest policy and procedure

#### 4.2 Members of staff forming too close a relationship with potential suppliers

**Control Measures**

- Promote Whistleblowing Policy and respond with covert or overt investigation
- Monitor pattern or spending with suppliers
- Overt promotion of concerns in this area without being specific
- Standards of Business Conduct provided to staff with promotion of gifts and hospitality policy
- Minuted suppliers meetings including templates
- Reporting procedure for staff being put under undue pressure
- Register of personal/business interests
4.3 Conflict of interest/abuse of position; the risk that a contract is unfairly awarded to a company/supplier on the basis of personal acquaintance.

**Control Measures**

- Joint/team decision to award for formal tenders (if managed centrally) i.e. no contract one person’s authority
- Tendering overseen by Procurement department
- Purchase orders over set limits i.e. £50k reviewed each week
- Independent oversight of supplier set up by Procurement
- Set authority levels throughout the organisation
- Established Preferred Supplier list
- One-Time Vendors require set up by Procurement centrally
- Index of fixed-price suppliers (catalogue)
- Declaration of Personal Interest documents to be recorded subject of a review schedule
- All contracts subject to competitive tendering process
- Separate independent technical / commercial evaluations
- Staff being subjected to pressure, escalation procedure via Procurement team
- Periodic review of one-time vendors
- Compliance with use of standard procurement templates/tools
- Standards of Business Conduct / disclosure of interests / whistleblowing / value for money requirements
- Pre-qualifications questionnaire for formal tenders over 50k
## 5 USE OF CONSULTANTS

### 5.1 Organisations employed senior consultants who could then affect established procurement procedures

**Control Measures**

- All material changes to procurement standard operating processes subject to approval from the Director of Procurement Services prior to change.
- Compliance with organisation contract regulations / procedures
- Compliance with scheme of delegation for contract commencement/short-listing/awards/signature
- Recruitment to engage on limited ‘temporary’ basis i.e. no more than 12 months
- Vetting of consultants prior to appointment to establish what went well in their previous engagement as a consultant and establish any major changes that were subsequently reversed from their previous engagements. (NOTE: This information should also be established from previous employers); and
- Ensuring that consultants report directly to a senior officer/executive within the procurement section who may also be the project sponsor
- Declaration of Interest forms completed at Project Initiation
- Decisions on high value procurement is subject to a gateway process and Procurement board approval

### 5.2 Consultants ‘project hopping’; possibly involving nepotism, ‘old boys’ network

**Control Measures**

- All requirements for staff resources and subsequent recommended appointments to be approved by an independent panel.
- A consultant should only be employed where there is a clear business need with approval and sign off
- Robust recruitment and vetting procedures;
- Establish whether there are any patterns whereby the same consultants appear to always work together on projects
- Required to sign a declaration, which includes identifying any previous projects worked on with consultants currently on the project
- Restrictions on contractors as interim staff filling a permanently established post
- Initial formal consultancy contract template
### 5.3 Consultants engaged for extensive periods (in excess of 3 years) in specialist and senior positions, making them effectively indispensible and in a position to recruit other consultants

**Control Measures**

- Consultants only engaged for short periods (no longer than 12 months).
- All additional periods need approval
- Adequate succession planning built in as part of the service continuity planning process;
- Recruitment of consultants by other consultants should always be conducted in conjunction with officers from HR who also engage in the selection panel
- Clear reporting lines (consultants in senior positions should always be required to report to a senior executive)
- Any ‘consultants’ in management positions should be held against an established post. Their departmental manager (often director level for the most senior consultants) would have to account for any resulting adverse variance against their budget. In terms of hiring and firing, they are subject to the same disclosure of interest rules
- Appointed via Corp Temp/Agency contract to provide visibility
- Independent review (audit) of consultant staff and reported to committee/panel

### 5.4 Consultants being re-deployed - Contrived Tender Process.

**Control Measures**

- All contract awards subject to approval in line with the scheme of delegation and VFM, competence against the evaluation criteria
- Specification/evaluation criteria drawn up so that more than one consultant is capable of being the successful bidder
- Procurement input into tender evaluation process
- Requirement either for a minimum number of tenders, according to the estimated value of the contract, or a single tender/less than the required number of tenders authorisation
- All new posts in need of panel approval
- No re-deployment rights for consultants
- Where tendering is necessary, an organisation’s standard tendering procedures should be applied
- Use Formal Consultancy Contract Template as part of the initial process
- Appointment of temporary consultants is subject to approval by appropriate Board
- All temp staff including interim project staff procured via a Corporate Temporary Agency contract
- Competitive tender process is subject to procurement procedures and sign off via appropriate Category Manager.
### 5.5 Inflated/fraudulent claims by Consultants

**Control Measures**

- Independent review of project spend
- Benchmarking with the market, costs in line with market rates, either ad hoc or as scheduled review
- Consultant spend monitored by project lead
- Countersigned Timesheets
- Expenses require line manager approval
- Senior officer responsible for authorising and reviewing claims;
- Significant overspends reported to Committee by finance team
- Adequate monitoring of budget adjustments (i.e. virements)
- Responsibility of budget holder approving the invoice to check claims
- Formal contracts with consultants

### 6 POST CONTRACT AND CONTRACT MANAGEMENT ISSUES

#### 6.1 Contract being extended beyond the authorised value and term thus making it non-compliant

**Control Measures**

- Contract managers in place with authority to question and escalate
- Contract Usage/Spend monitored through monthly compliance reports
- Standard operating procedures for granting contract extensions/variations
- Contracts Manager escalates for appropriate action
- Contract sponsor should be required to report progress to a committee that is made up of members and senior executives;
- Significant overspends reported to Committee by finance team;
- Adequate monitoring of budget adjustments (i.e. virements)
- A formal process is in place to authorise significant budget virements.
- Individual purchase orders being raised for contract would highlight once the authorised value had been exceeded. This would trigger another approval process.
- This should become apparent through contract management (see earlier), either by responsible department or Procurement.
- Standing Financial Instructions and contract register in place
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<tr>
<th>6.2 Lack of on-going contract and supplier management</th>
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<tr>
<td><strong>Control Measures</strong></td>
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<tr>
<td>Freelance unit manage Temp/Consultants via managed Contract framework</td>
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<td>Contract Management toolkit developed for Contract Managers</td>
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<td>Regular suppliers meetings to maintain performance against KPI’s</td>
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<td>Formal contract meetings are held on a regular basis with the supplier</td>
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<td>Performance against contract specifications should be evidence based or subject to compliance checks by contract management;</td>
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<td>Contract performance is reported to Senior Management/ Contract Board</td>
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<td>Annual contract review meetings are held</td>
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<td>Fully staffed strategic procurement department</td>
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<tr>
<th>6.3 Inflated costs; the risk that a contractor/supplier overcharges or invoices for inflated time spent on a job</th>
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<tr>
<td><strong>Control Measures</strong></td>
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<tr>
<td>For some suppliers a framework contract or other agreement in place to include rates i.e. fixed priced catalogue</td>
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<tr>
<td>Higher value spend have contract managers to review invoices in detail</td>
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<td>Purchase orders matched to invoice with a tolerance limit for difference in cost (lower of 10% or £200)</td>
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<td>Improper behaviour by supplier – Procurement block vendor on system Blockage can only be removed by Procurement</td>
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<td>All payments to contractors that are dependant on the time spent should be supported by a timesheets which have been authorised by an authorised officer</td>
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<tr>
<td>Benchmarks costs against framework rates/catalogues</td>
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<td>High value invoices monitored by Finance/Procurement</td>
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<td>Contract in place with supplier including schedule/rates</td>
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<td>System controls for price discrepancies between invoices and purchase orders</td>
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<tr>
<td>Responsibility of budget approver/responsible line manager to check</td>
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<tr>
<td>Possibility of benchmarking hourly rates against national frameworks</td>
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<td>Authorisation process. Budgetary control</td>
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<td>Accounts payable challenge all invoices above a pre agreed variance threshold</td>
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### 6.4 Invoices not monitored and no supporting documentation

**Control Measures**

- Invoices paid to properly authorised vendor accounts on computer system.
- Full visibility of payments and access to invoices for audit and inspection.
- Requisition to Pay System ensures invoices without a Purchase Order cannot be paid.
- A budget monitoring system is in place
- Electronic invoice management system in use
- Invoices and supporting evidence is retained and accessible as an audit trail of the transaction
- All invoices properly authorised – authoriser will require appropriate supporting documentation

### 6.5 Lack of Monitoring of contracts due to staff shortages

**Control Measures**

- Allocated Contracts Manager for contracts including procurement/business lead on internal form
- Category specific procurement structure
- Budget allocation/reviews takes into account key areas of risk
- Resources allocated to key contract specifications
- Level of contract monitoring specified on value/risk of contract

### 6.6 Purchase of goods for personal use

**Control Measures**

- POs raised, authorised and subsequently matched to invoice (segregation of duties)
- Financial management information produced by exception for analysis
- Goods can only be delivered to an address predetermined in the system
- Single point of purchase for IT
- Asset register for certain goods (especially IT)
- Segregation of duties built into systems
- Business case required for new goods/works/services
- Separate financial budget/procurement route approvals
- Non-approved suppliers blocked centrally
- Periodic review of one-time vendors
- Without evidence of receipt, the invoice will not be paid
- Audit reviews of high value payments
- Purchase to Pay system - senior line manager must approve orders
- A whistle blowing procedure is in place
### 6.7 Fraudulent travel costs; the risk that an individual books travel through the organisation/separately for personal use paid for by the organisation

**Control Measures**

- PIN required for transport bookings by agents
- Separate PIN for each cost centre
- Regular travel advice spreadsheets produced by Procurement for review monthly
- Agency reports also available for review against internal systems
- Exception reports to financial directors and controllers monthly
- Travel via expenses authorised and itemised
- Expenses independently checked
- Non-approved suppliers blocked centrally
- Periodic review of One-Time Vendors
- All travel expenditure must be completed via travel application and authority form which requires both approval from the individuals line manager and counter approved by the travel services section
- Expenses/Business card spend monitored on a monthly basis
- Checks are performed for any home to base mileage
- Checks are made if distances or the mileage looks incorrect/over inflated
- Authoriser/manager to check if the journey was valid and for work business

### 6.8 Manipulation of costs; the risk that management record bogus discounts/rebates to suppress procurement spend in their area

**Control Measures**

- Limited number of financial people can make annual journal entries system
- Independent authorisers within Finance can raise and authorise
- Report every month to the financial controller showing the level of journals at each month’s end
- Review of budget versus actual full management accounts
- Year end audit
- System controls for price discrepancies between invoices and purchase orders
- Discounts visible on general ledger accounts and traceable to invoice posting
- A reporting module highlighting all areas of spend which allows viewing individual invoices for further clarification