

PAYMENT OF SUPPLIER INVOICES

NOVEMBER / 2020

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Name of Policy:	Payment of Supplier Invoices
Date Issued:	November 2020
Date to be reviewed:	November 2022

Policy Title:	Payment of Supplier Invoices	
Supersedes: (Please List)	All previous versions of Payment of Supplier Invoices Policies	
Description of Amendment(s):	Reformatting to new policy template/ rewording as necessary / review of impact analysis	
This policy will impact on:	All employees of the CCG, all staff who are seconded to the CCG, contract and agency staff and any other individual working on CCG premises including financial services employees (currently hosted by NHS East Riding CCG).	
Policy Area:	Finance	
Version No:	4.0	
Author:	Victoria Rimmington, Finance Manager	
Effective Date:	25 th November 2020	
Review Date:	25 th November 2022	
Equality Impact Assessment Date:	9th October 2019	
APPROVAL RECORD		Date:
	Integrated Audit and Governance Committee	10 th March 2020
	Integrated Audit and Governance Committee	14 th November 2017
Consultation:	Integrated Audit and Governance Committee	15 th November 2016
	Integrated Audit and Governance Committee	14 th November 2017
	Integrated Audit and Governance Committee	15 th November 2016



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1. INTRODUCTION

The CCG incurs costs for the goods and services it consumes in order to deliver healthcare to its target population.

This policy provides guidance on how to pay for these goods and services in a controlled and efficient way.

2. SCOPE

This policy applies to all employees of the CCG, any staff who are seconded to the CCG, contract and agency staff and any other individual working on CCG premises including financial services employees (currently hosted by NHS East Riding CCG)..

This policy is available on the CCG website.

Guidance and support will be provided as and when required by the CCG finance team.

3. POLICY PURPOSE AND AIMS

This policy is intended to provide guidance to employees and managers of the steps to take, and the controls in place to enable timely payments of invoices for goods and services supplied to the CCG.

4. IMPACT ANALYSIS

4.1 Equality

The CCG is committed to:

- Eliminating discrimination and promoting equality and diversity in its policies, procedures and guidelines, and
- Designing and implementing services, policies and measures that meet the diverse needs of its population and workforce, ensuring that no individual or group is disadvantaged.

To ensure the above this policy has been Equality Impact Assessed (see Appendix 1)

4.2 Bribery Act 2010

NHS Hull Clinical Commissioning Group has a responsibility to ensure that all staff are made aware of their duties and responsibilities arising from The Bribery Act 2010.

The Bribery Act 2010 makes it a criminal offence to bribe or be bribed by another person by offering or requesting a financial or other advantage as a reward or incentive to perform a relevant function or activity improperly performed. The penalties for any breaches of the Act are potentially severe. There is no upper limit on the level of fines that can be imposed and an individual convicted of an offence can face a prison sentence of up to 10 years.

For further information see <http://www.justice.gov.uk/guidance/docs/bribery-act-2010-quick-start-guide.pdf>.

If you require assistance in determining the implications of the Bribery Act please contact the Local Counter Fraud Specialist on telephone number 01482 866800 or email at nikki.cooper1@nhs.net.

Due consideration has been given to the Bribery Act 2010 in the review of this policy document and no specific risks were identified.

5. NHS CONSTITUTION

5.1 The CCG is committed to:

- The achievement of the principles, values, rights, pledges and responsibilities detailed in the NHS Constitution, and
- Ensuring they are taken account of in the production of its Policies Procedures and Guidelines.

5.2 This policy supports the NHS Constitution by committing to use NHS resources responsibly and fairly and providing best value for taxpayer's money.

6. RESPONSIBILITIES

6.1 Authorised Signatories

Authorised signatories are responsible for ensuring that invoices are accurately coded and signed for within allocated limits.

6.2 Financial Services Team

Financial services are responsible for the processing of invoices, ensuring systems and relationships are working to allow payments to suppliers to meet the 'better

practice payment codes' target effectively and efficiently as possible.

6.3 All Staff

All staff are responsible for ensuring prompt authorisation and coding of invoices for payment targets to be met as in section 7.

7. NHS HULL CCG OBLIGATION

As an NHS organisation, NHS Hull CCG has signed up to the Institute of Credit Management 'Prompt Payment Code' whereby we undertake to pay suppliers within the terms agreed at the outset of the contract.

In addition, all CCG's must meet a 'Better Payment Practice Code' target of paying 95% of bills within contract terms or 30 days where no terms have been agreed. On a monthly basis Financial Services will provide a report to the CCG with statistics to this effect. This is reported to the Quality and Performance Committee on a monthly basis and included in the board report.

8. PAYMENT OF INVOICES

8.1 All Staff

All supplier invoices received by the CCG must be sent to Shared Business Services at the below address. This address also needs to be on the invoice. Invoices cannot be accepted to the site address.

NHS Hull CCG 03F Payables L295
PHOENIX HOUSE
TOPCLIFFE LANE
WAKEFIELD
WF3 1WE

Where appropriate, invoices must be matched with relevant order/delivery notes.

Using Oracle system non-purchase order invoices must be distributed by SBS /Financial Services to the relevant checkers/budget holders of the CCG for coding and authorisation via Oracle (please refer to SBS guidance for details on how to do this).

Each department is responsible for coding their own invoices according to the budget holder list. Invoices must not be returned without a financial code. For coding information please refer to the budget book or contact the CCG finance team.

All invoices should be checked by a person who can verify the goods/services have

been received.

Authorised signatories should then approve to authorise the payment of invoices.

All invoices relating to an individual must be signed by the line manager of the individual to which it relates. Individuals cannot authorise invoices relating to themselves

Invoices should be split-coded where appropriate for example, in cases where multiple items on the invoice require different cost codes. Under no circumstances can invoices be split-coded to other organisations e.g. other CCGs. Similarly, other organisations have no authority to allocate expenditure to NHS Hull CCG.

It will not normally be acceptable to pay part-invoices where the amount payable has been amended by an officer of the CCG. If an invoice is incorrect, the supplier should be advised they should cancel/credit the original invoice and send a revised invoice for payment.

Financial Services should be informed of any disputes with regards to invoices and the invoice should be rejected or forwarded to member of financial services (note can be included on oracle) to dispute with suppliers.

8.2 Financial Services/SBS Staff

VAT for business activity and contracted out services must be claimed as per current HM Revenue and Customs rules and guidance. Invoices are assessed by SBS/VAT Liaison as to what can be reclaimed. This is then reviewed by the Financial Services team and authorised by the CCG.

When invoices are authorised SBS will flag them for payment and Financial services team will confirm that sufficient funds are available before processing before being paid on the next available run.

At every meeting of the Integrated Audit & Governance Committee they will receive a report of all supplier invoices that are over £5,000 and have been outstanding for more than 6 months.

Monthly and/or quarterly meetings will be held between financial services and CCG staff to discuss the creditor's position (NHS & non-NHS).

Financial Services/CCG teams will provide training and support to oracle users as and when required.

9. MONITORING AND REVIEW

Monitoring compliance with and effectiveness of this policy will be accomplished via the statistics in better payment practice, creditor reports and periodic Internal Audit reviews of accounts payable systems.

This Policy will be reviewed every two years from the date of implementation, more frequently if required

10. ASSOCIATED DOCUMENTATION

Prompt Payment Code available at: www.promptpaymentcode.org.uk

<https://www.sbs.nhs.uk/supplier-good-invoicing-practice>

Raising Debtor requests Policy

APPENDIX 1

Please refer to the EIA Overview & Navigation Guidelines located in Y:\HULLCCG\Corporate Templates and Forms\Equality and Diversity Information before completing your EIA)

HR / Corporate Policy Equality Impact Analysis:	
Policy / Project / Function:	Payment of Supplier Invoices
Date of Analysis:	26 th September 2019
Completed by: (Name and Department)	Victoria Rimmington, Finance Manager
What are the aims and intended effects of this policy, project or function?	This policy is intended to provide guidance to employees and managers of the steps to take, and the controls in place to enable timely payments of invoices for goods and services supplied to the CCG
Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?	No significant changes made
Please list any other policies that are related to or referred to as part of this analysis	Raising Debtor Requests
Who will the policy, project or function affect?	All employees of the CCG, all staff who are seconded to the CCG, contract and agency staff and any other individual working on CCG premises including financial services employees (currently hosted by NHS East Riding CCG).
What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?	IAGC
Promoting Inclusivity and Hull CCG's Equality Objectives. How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation? How does the policy promote our equality	This policy applies to all regardless of any protected characteristic. This policy is available on the internet and is available in different formats and languages if necessary.

<p>objectives:</p> <ol style="list-style-type: none"> 1. Ensure patients and public have improved access to information and minimise communications barriers 2. To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone's day-to-day job 3. Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve 4. Ensure the that NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs 	
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Equality Data	
<p>Is any Equality Data available relating to the use or implementation of this policy, project or function?</p> <p>Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine <i>Protected Characteristics</i> – referred to hereafter as '<i>Equality Groups</i>'.</p> <p>Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <ol style="list-style-type: none"> 1: Recruitment data, e.g. applications compared to the population profile, application success rates 2: Complaints by groups who share / represent protected characteristics 4: Grievances or decisions upheld and dismissed by protected characteristic group 5: Insight gained through engagement 	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document). If you answered No, what information will you use to assess impact?</p> <p>Please note that due to the small number of staff employed by the CCG, data with returns small enough to identify individuals cannot be published. However, the data should still be analysed as part of the EIA process, and where it is possible to identify trends or issues, these should be recorded in the EIA.</p>

Assessing Impact

Is this policy (or the implementation of this policy) likely to have a particular impact on any of the protected characteristic groups?

(Based on analysis of the data / insights gathered through engagement, or your knowledge of the substance of this policy)

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and, if applicable, justification where a <i>Genuine Determining Reason</i> ¹ exists (see footnote below – seek further advice in this case)
<p>It is anticipated that these guidelines will have a positive impact as they support policy writers to complete meaningful EIAs, by providing this template and a range of potential issues to consider across the protected characteristics below. There may of course be other issues relevant to your policy, not listed below, and some of the issues listed below may not be relevant to your policy.</p>				
Gender	✓			This has been considered and has no impact. This policy applies to all regardless of gender
Age	✓			This has been considered and has no impact. This policy applies to all regardless of age
Race / ethnicity / nationality	✓			This has been considered and has no impact. This policy applies to all regardless of race, ethnicity or nationality
Disability	✓			This has been considered and has no impact. This policy applies to all regardless of disability
Religion or Belief	✓			This has been considered and has no impact. This policy applies to all regardless of religion or belief
Sexual Orientation	✓			This has been considered and has no impact. This policy applies to all

1. ¹ The action is proportionate to the legitimate aims of the organisation (please seek further advice)

				regardless of sexual orientation
Pregnancy and Maternity	✓			This has been considered and has no impact. This policy applies to all regardless of pregnancy and maternity
Transgender / Gender reassignment	✓			This has been considered and has no impact. This policy applies to all regardless of transgender or gender reassignment
Marriage or civil partnership	✓			This has been considered and has no impact. This policy applies to all regardless of marriage or civil partnership

Action Planning:

As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse impact or strengthen the promotion of equality?

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:

Sign-off

All policy EIAs must be signed off by Mike Napier, Associate Director of Corporate Affairs

I agree / disagree with this assessment / action plan

If *disagree*, state action/s required, reasons and details of who is to carry them out with timescales:



Signed:

Date: 09.10.19