

WRITING OFF BAD DEBTS

NOVEMBER / 2020

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If you need this document in a different format or language (e.g. large print, Braille, audio or easy read), please contact us on 01482 344700, or email HULLCCG.contactus@nhs.net, or write to: NHS Hull Clinical Commissioning Group, 2nd Floor, Wilberforce Court, Alfred Gelder Street, Hull HU1 1UY.

Name of Policy:	Writing off Bad Debts
Date Issued:	November 2020
Date to be reviewed:	November 2022

Policy Title:	Writing off Bad Debts	
Supersedes: (Please List)	All previous versions of writing off bad debt 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, any staff that 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:	9 th 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	10 th March 2020
	Integrated Audit and Governance Committee	14 th November 2017
	Integrated Audit and Governance Committee	15 th November 2016

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1. INTRODUCTION

This policy is to document the procedure for writing off debts owed by non-NHS organisations where the CCG assesses that it is unlikely that payment will be received.

2. SCOPE

This policy applies to all employees of the CCG, any staff that 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 NHS Hull CCG website

3. POLICY PURPOSE AND AIMS

This policy aims to outline the procedures to be followed to write off bad debts when all attempts to recover Non NHS debts have been exhausted

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

Every effort must be made to receive payment for the invoices raised by both CCG and Financial Services teams.

Authorised signatories should try to seek agreement from other party before invoice is raised to prevent any disputes, and should assist the finance teams to get any disputes resolved efficiently

7. WRITING OFF BAD DEBTS PROCEDURE

This procedure is only applicable to debts with non-NHS organisations. NHS debts are never written off as bad debts.

The Debtors Clerk from Financial Services will advise the CCG when all credit control letters have been sent out and any follow up telephone calls have been made, where amounts due are outstanding in excess of 90 days.

The CCG Deputy CFO will review the aged debt and decide which debtors will be credit managed and if any will be referred to an external debt collector.

On a monthly/quarterly basis Financial Services will compile a list of debtors to be referred to external debt collectors and forwarded to the CCG for review and approval.

Financial Services will make an assessment regarding individual debts based on any other information available and a recommendation will be made to the CCG's Deputy CFO regarding write off.

Before any write off is approved the CCG's Deputy CFO must be satisfied that all efforts have been made to recover the debt and that there are no outstanding queries from the customer giving reason for non-settlement.

The appropriate accounting transactions will be undertaken by the Financial Services team and details of any bad debts written off will be filed with the Annual Accounts working papers for the relevant financial year.

For amounts over £1,000 a 'losses and special payments form' will need to be completed and authorised and it is good practice to complete these for all losses. (See separate 'Losses and Special Payments' policy for details).

8. MONITORING AND REVIEW

This policy will be monitored with regular reviewing of the aged debtor report.

This policy will be reviewed every two years, more frequently if necessary.

9. ASSOCIATED DOCUMENTATION

Losses and Special Payments 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:	Writing off Bad Debts
Date of Analysis:	19 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 aims to outline the procedures to be followed to write off bad debts when all attempts to recover Non NHS debts have been exhausted
Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?	No significant changes
Please list any other policies that are related to or referred to as part of this analysis	Losses and special payments policy
Who will the policy, project or function affect?	All employees of the CCG, any staff that 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.	This policy applies to all regardless of any protected characteristic.
How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation?	This policy is available on the internet and is available in different formats and languages if necessary.
How does the policy promote our equality	

<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 procedure has been considered to have no impact and applies to all regardless of gender
Age	✓			This has been considered and has no impact. This policy applies equally to all regardless of age
Race / ethnicity / nationality	✓			This procedure has been considered to have no impact and applies to all regardless of any religion race, ethnicity or nationality
Disability	✓			This procedure has been considered to have no impact and applies to all regardless of any disabilities
Religion or Belief	✓			This procedure has been considered to have no impact and applies to all regardless of any religions and/or beliefs

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

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

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