

Board meeting in public

Wednesday 01 April 2026



West and North London
Integrated Care Board

Report Title	Standing Financial Instructions (SFIs)	Date of report	24 March 2026	Agenda Item	2.4
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Board Member Sponsor	Steve Bloomer				
Report Author	Alex Stiles – Director of Finance, NWL ICB	Email / Tel		alexstiles@nhs.net	
Recommendation	The Board is asked to APPROVE the Standing Financial Instructions				
Name of Authorising Finance Lead	Steve Bloomer	Summary of Financial Implications The SFIs do not introduce new financial commitments.			
Report summary	<p>This paper sets out the SFIs for the ICB for Board approval.</p> <p>The purpose of the SFIs is to ensure that the ICB discharges its statutory duties and manages its financial affairs effectively, efficiently, economically and in accordance with the principles of regularity and propriety.</p> <p>The SFIs set out the detailed financial responsibilities, policies and procedures that govern the conduct of the ICB's financial business and support robust stewardship of public funds.</p> <p>The detailed delegated financial limits are set out within the appendix to the Scheme of Reservation and Delegation.</p>				
Identified risks and risk management actions	The SFIs provide the framework for effective financial control.				
Conflicts of interest	Not applicable.				
Resource implications	The SFIs do not introduce new financial commitments				
Engagement	Not applicable.				
Equality impact analysis	Not applicable.				
Report history and key decisions	Not applicable.				
Next steps	Not applicable.				
Appendices	Not applicable.				

West and North London Integrated Care Board

Standing Financial Instructions

Draft 0.1 – 09/02/2026

Document Management		
Version	09/02/2026	Summary of Changes
V0.1	09/02/2026	First Draft
V0.2	03/03/2026	14.3 Corrected to reflect CPO responsibility
V.03	24/03/2026	Updated following feedback from governance team

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1. Purpose and statutory framework

- 1.1.1 These are the Standing Financial Instructions (SFIs) for NHS West and North London Integrated Care Board.
- 1.1.2 In accordance with the National Health Service Act 2006, as amended by the Health and Care Act 2022, the ICB must publish its constitution. In accordance with the Act as amended, NHS England is mandated to publish guidance for ICBs, to which each ICB must have regard, to discharge their duties.
- 1.1.3 The purpose of this governance document is to ensure that the ICB fulfils its statutory duty to conduct its functions effectively, efficiently, and economically. The SFIs are part of the ICB's control environment for managing the organisation's financial affairs as they are designed to ensure regularity and propriety of financial transactions.
- 1.1.4 SFIs define the purpose, responsibilities, legal framework, and operating environment of the ICB. They enable sound administration, lessen the risk of irregularities and support commissioning and delivery of effective, efficient, and economic services.
- 1.1.5 The ICB is established under Chapter A3 of Part 2 of the National Health Service Act 2006, as inserted by the Health and Care Act 2022 and has the general function of arranging for the provision of services for the purposes of the health services in England in accordance with the Act.
- 1.1.6 Each ICB is to be established by order made by NHS England for an area within England, the order establishing an ICB makes provision for the constitution of the ICB.
- 1.1.7 All members of the ICB (its board) and all other Officers should be aware of the existence of these documents and be familiar with their detailed provisions. The ICB SFIs will be made available to all Officers on the intranet and on the ICB's website.
- 1.1.8 Should any difficulties arise regarding the interpretation or application of any of these SFIs, the advice of the Chief Executive or the Chief Finance Officer must be sought before acting.
- 1.1.9 Failure to comply with the SFIs may result in disciplinary action in accordance with the ICB's applicable disciplinary policy and procedure in operation at that time.

2. Scope

- 2.1.1 All officers of the ICB, without exception, are within the scope of the SFIs without limitation. The term 'Officer' includes office holders, employees, secondees, temporary staff and contract workers.
- 2.1.2 Within this document, words imparting any gender include any other gender. Words in the singular include the plural and words in the plural include the singular.
- 2.1.3 Any reference to an enactment is a reference to that enactment as amended.
- 2.1.4 Unless a contrary intention is evident, or the context requires otherwise, words or expressions contained in this document will have the same meaning as set out in the applicable Act.

3. Roles and Responsibilities

3.1 Staff

- 3.1.1 All ICB Officers are responsible for:
- abiding by all conditions of any delegated authority;
 - the security of the statutory organisation's property and avoiding all forms of loss;
 - ensuring integrity, accuracy, probity, and value for money in the use of resources; and
 - Abiding by the requirements of these SFIs.

3.2 Accountable Officer

- 3.2.1 The ICB constitution provides for the appointment of the Chief Executive by the ICB Chair. The Chief Executive is the Accountable Officer for the ICB and is personally accountable to NHS England for the stewardship of ICBs' allocated resources.
- 3.2.2 The Chief Finance Officer (CFO) reports directly to the ICB Chief Executive Officer and is professionally accountable to the NHS England regional finance director.
- 3.2.3 The Chief Executive will delegate to the Chief Finance Officer the following responsibilities in relation to the ICB:
- preparation and audit of annual accounts;
 - adherence to the directions from NHS England in relation to accounts preparation;
 - ensuring that the allocated annual revenue and capital resource limits are not exceeded, jointly, with system partners;

- ensuring that there is an effective financial control framework in place to support accurate financial reporting, safeguard assets and minimise risk of financial loss;
- meeting statutory requirements relating to taxation;
- ensuring that there are suitable financial systems in place (see Section 6)
- meets the financial targets set for it by NHS England;
- use of incidental powers such as management of ICB assets, entering commercial agreements;
- The signing of the Annual Accounts;
- planned budgets are approved by the Board; developing the funding strategy for the ICB to support the Board in achieving ICB objectives, including consideration of place-based budgets;
- making use of benchmarking to make sure that funds are deployed as effectively as possible;
- Executive Members, Partner Members, Non-Executive Members and Other Members and other officers are notified of and understand their responsibilities within the SFIs;
- specific responsibilities and delegation of authority to specific job titles are confirmed;
- financial leadership and financial performance of the ICB;
- identification of key financial risks and issues relating to robust financial performance and leadership and working with relevant providers and partners to enable solutions; and
- supporting a strong culture of public accountability, probity, and governance, ensuring that appropriate and compliant structures, systems, and process are in place to minimise risk.

3.3 Audit Committee

3.3.1 The Board and Accountable Officer is supported by an Audit Committee, which provides proactive support to the Board in advising on the management of key areas of risk as follows;

- Ensuring there is a robust risk management framework in place that operates effectively;
- the operation of internal controls;
- control and governance and the governance statement;
- the accounting policies, the accounts, and the annual report of the ICB;
- the process for reviewing the accounts prior to submission for audit, management's letter of representation to the external auditors; and
- the planned activity and results of both internal and external audit.

4. Management accounting and business management

4.1.1 The Chief Finance Officer (CFO) is responsible for maintaining policies and processes relating to the control, management and use of resources across the ICB.

4.1.2 The CFO will delegate the budgetary control responsibilities to budget holders through a formal documented process.

4.1.3 The CFO will ensure:

- the promotion of compliance to these SFIs through an assurance certification process;
- the promotion of long-term financial health for the NHS system (including ICS);
- budget holders are accountable for obtaining the necessary approvals and oversight of all expenditure incurred on the cost centres for which they are responsible;
- the improvement of financial literacy of budget holders with the appropriate level of expertise and systems training;
- that the budget holders are supported in proportion to the operational risk; and
- the implementation of financial and resources plans that support the NHS Long Term Plan objectives.

4.1.4 In addition, the CFO should have financial leadership responsibility for the following statutory duties:

- in conjunction with its partner NHS trusts and NHS foundation trusts, to exercise the ICB's functions with a view to ensuring that, in respect of each financial year:
 - local capital resource use does not exceed the limit specified in a direction by NHS England; and
 - local revenue resource use does not exceed the limit specified in a direction by NHS England;
- ensuring that the ICB's expenditure does not exceed the aggregate of its allotment from NHS England and its other income; and
- in conjunction with its partner trusts, to seek to achieve any joint financial objectives set by NHS England for the ICB and its partner trusts.

4.1.5 The CFO *and any senior officer responsible for finance within the ICB* should also promote a culture where budget holders and decision makers consult their finance business partners in key strategic decisions that carry a financial impact.

5.1 Income

5.1.1 An ICB has power to do anything specified in section 7(2)(a), (b) and (e) to (h) of the Health and Medicines Act 1988 for the purpose of making additional income available for improving the health service.

- 5.1.2 The Chief Finance Officer (CFO) is responsible for:
- ensuring order to cash practices are designed and operated to support, efficient, accurate and timely invoicing and receipting of cash. The processes and procedures should be standardised and harmonised across the NHS system by working cooperatively with the Shared Services provider; and
 - ensuring the debt management strategy reflects the debt management objectives of the ICB and the prevailing risks.

5.2 Banking

5.2.1 The CFO is responsible for ensuring the ICB complies with any directions issued by the Secretary of State with regards to the use of specified banking facilities for any specified purposes.

5.2.2 The CFO will ensure that:

- the ICB holds the minimum number of bank accounts required to run the organisation effectively. These should be raised through the government banking services contract; and
- the ICB has effective cash management policies and procedures in place.

5.3 Debt management

5.3.1 The CFO is responsible for the management of ICB debts.

5.3.2 The Scheme of Reservation and Delegation sets out the approval process for the write-off of any bad debts.

6. Financial systems and processes

6.1 Provision of finance systems

6.1.1 The Chief Finance Officer (CFO) is responsible for ensuring systems and processes are designed and maintained for the recording and verification of finance transactions such as payments and receivables for the ICB.

6.1.2 The systems and processes will ensure, inter alia, that payment for goods and services is made in accordance with the provisions of these SFIs, related procurement guidance and agreed prompt payment policies and practices.

6.1.3 As part of the contractual arrangements, ICB officers will be granted access, where appropriate, to the Integrated Single Financial Environment (“ISFE”). This is the required

accounting system for use by ICBs. Access is based on single access log on to enable users to perform core accounting functions such as transacting and coding of expenditure / income in fulfilment of their roles.

6.1.4 In relation to financial systems, the CFO will:

- promote awareness and understanding of financial systems, value for money and commercial issues;
- ensure that transacting is carried out efficiently and in line with current best practice – e.g. use of purchase orders;
- ensure that the ICB meets the required financial and governance reporting requirements as a statutory body, through the effective use of finance systems;
- enable the prevention and the detection of inaccuracies and fraud, and the reconstitution of any lost records;
- ensure that the financial transactions of the authority are recorded as soon and as accurately as reasonably practicable;
- ensure publication and implementation of all ICB business rules and ensure that the internal finance team is appropriately resourced to deliver all statutory functions of the ICB;
- ensure that risk is appropriately identified, recorded and managed;
- ensure identification of the duties of officers dealing with financial transactions and the division of responsibilities of those officers;
- ensure the ICB has suitable financial and other software to enable it to comply with these SFIs and any consolidation requirements of the ICB;
- ensure that contracts for computer services for financial applications with another health organisation or any other agency shall clearly define the responsibility of all parties for the security, privacy, accuracy, completeness, and timeliness of data during processing, transmission and storage. The contract should also ensure rights of access for audit purposes; and
- where another health organisation or any other agency provides a computer service for financial applications, the CFO shall periodically seek assurances that adequate controls are in operation.

7. Procurement and purchasing

7.1 Principles

- 7.1.1 The Chief Finance Officer (CFO) will take a lead role on behalf of the ICB to ensure that there are appropriate and effective financial, contracting, monitoring and performance arrangements in place to ensure the delivery of effective health services.
- 7.1.2 The ICB must ensure that procurement activity is in accordance with Procurement Act 2023 and the NHS Provider Selection Regime ('PSR') and associated statutory requirements whilst securing value for money and sustainability.
- 7.1.3 The ICB must consider, as appropriate, any applicable NHS England guidance that does not conflict with the above.
- 7.1.4 The ICB must have a Procurement Policy which sets out all the legislative requirements.
- 7.1.5 All revenue and non-pay expenditure must be approved, in accordance with the ICB's business case policy, prior to an agreement being made with a third party that enters a commitment to future expenditure.
- 7.1.6 All officers must ensure that any conflicts of interest are identified, declared and appropriately mitigated or resolved in accordance with the ICB Conflicts of Interest & Standards of Business Conduct policy.
- 7.1.7 Budget holders are accountable for obtaining the necessary approvals and oversight of all expenditure incurred on the cost centres for which they are responsible. This includes obtaining the necessary internal and external approvals which vary based on the type of spend, prior to procuring the goods, services or works.
- 7.1.8 Undertake any contract variations or extensions in accordance with the Procurement Act 2023, PSR and the ICB Procurement Policy.
- 7.1.9 Retrospective expenditure approval should not be permitted. Any such retrospective breaches require approval from the CFO before the liability is settled. Such breaches must be reported to the Audit Committee.
- 7.1.10 Appropriate records of decisions and outcomes for all procurements must be made in line with the provisions in the Health and Care Act 2022 to act transparently, fairly and proportionately.

8. Staff costs and staff related non-pay expenditure

8.1 Chief People Officer

- 8.1.1 The Chief People Officer ('CPO') will lead the development and delivery of the long-term people strategy of the ICB ensuring this reflects and integrates the strategies of all relevant partner organisations within the ICS.
- 8.1.2 Operationally the CPO will be responsible for:
- defining and delivering the organisation's overall human resources strategy and objectives; and
 - overseeing delivery of human resource services to ICB employees.
- 8.1.3 The CPO will ensure that the payroll system has adequate internal controls and suitable arrangements for processing deductions and exceptional payments.
- 8.1.4 Where a third-party payroll provider is engaged, the CPO shall closely manage this supplier through effective contract management.
- 8.1.5 The CPO is responsible for management and governance frameworks that support the ICB employees' life cycle.

9. Annual reporting and Accounts

- 9.1.1. The Chief Finance Officer (CFO) will ensure, on behalf of the Accountable Officer and ICB board, that:
- the ICB can produce its required monthly reporting, annual report, and accounts, as part of the setup of the new organisation; and
 - the ICB, in each financial year, prepares a report on how it has discharged its functions in the previous financial year;
- 9.1.2 An annual report must explain how the ICB has:
- discharged its duties in relating to improving quality of services, reducing inequalities, the triple aim and public involvement;
 - review the extent to which the board has exercised its functions in accordance with its published five-year forward plan and capital resource use plan; and
 - review any steps that the board has taken to implement any joint local health and wellbeing strategy.
- 9.1.3 NHS England may give directions to the ICB as to the form and content of an annual report.

9.1.4 9.1.4 The ICB must give a copy of its annual report to NHS England by the date specified by NHS England in a direction and publish the report.

9.2 Internal audit

- 9.2.1 The Chief Executive Officer ('CEO'), as the Accountable Officer ('AO'), is responsible for ensuring there is appropriate internal audit provision in the ICB. For operational purposes, this responsibility is delegated to the Chief Finance Officer to ensure that:
- all internal audit services provided under arrangements proposed by the CFO are approved by the Audit Committee, on behalf of the ICB board;
 - the ICB must have an internal audit charter. The internal audit charter must be prepared in accordance with the Public Sector Internal Audit Standards (PSIAS);
 - the ICB internal audit charter and annual audit plan, must be endorsed by the AO and Audit Committee, on behalf of the board;
 - the head of internal audit must provide an annual opinion on the overall adequacy and effectiveness of the ICB Board's framework of governance, risk management and internal control as they operated during the year, based on a systematic review and evaluation;
 - the head of internal audit should attend Audit Committee meetings and have a right of access to all Audit Committee members, the Chair and CEO of the ICB; and
 - appropriate and effective financial control arrangements are in place for the ICB and that accepted internal and external audit recommendations are actioned in a timely manner.

9.3 External Audit

- 9.3.1 The Chief Finance Officer is responsible for:
- liaising with external audit colleagues to ensure timely delivery of financial statements for audit and publication in accordance with statutory, regulatory requirements;
 - ensuring that the ICB appoints an auditor in accordance with the Local Audit and Accountability Act 2014; in particular, the ICB must appoint a local auditor to audit its accounts for a financial year not later than 31 December in the preceding financial year; the ICB must appoint a local auditor at least once every five years; and
 - ensuring that the appropriate and effective financial control arrangements are in place for the ICB and that accepted external audit recommendations are actioned in a timely manner.

10. Losses and special payments

- 10.1.1. HM Treasury approval is required if a transaction exceeds the delegated authority, or if transactions will set a precedent, are novel, contentious or could cause repercussions elsewhere in the public sector.

- 10.1.2 The Chief Finance Officer ('CFO') will support a strong culture of public accountability, probity, and governance, ensuring that appropriate and compliant structures, systems, and process are in place to minimise risks from losses and special payments.
- 10.1.3 NHS England has the statutory power to require an ICB to provide NHS England with information. The information, which is not limited to that relating to losses and special payments, must be provided in such form, and at such time or within such period, as NHS England may require.
- 10.1.4 As part of the compliance and control procedures, ICBs must submit an annual assurance statement confirming the following:
- details of all exit packages (including special severance payments) that have been agreed and / or made during the year;
 - that NHS England and HMT approvals have been obtained before any offers, whether verbally or in writing, are made; and
 - adherence to the special severance payments guidance as published by NHS England.
- 10.1.5 All losses and special payments (including special severance payments) must be reported to the ICB Audit Committee and where appropriate NHS England.
- 10.1.6 For detailed operational guidance on losses and special payments, please refer to the ICB losses and special payment guide.

11. Fraud, bribery, and corruption (Economic crime)

- 11.1.1. The ICB is committed to identifying, investigating and preventing economic crime.
- 11.1.2 The Chief Finance Officer is responsible for ensuring appropriate arrangements are in place to provide adequate counter fraud provision which should include reporting requirements to the Board and Audit Committee, and defined roles and accountabilities for those involved as part of the process of providing assurance to the board. These arrangements should comply with the NHS Requirements the Government Functional Standard 013 Counter Fraud as issued by NHS Counter Fraud Authority and any guidance issued by NHS England.

12. Capital Investments & security of assets and Grants

- 12.1.1 The Chief Finance Officer (CFO) is responsible for:
- ensuring that at the commencement of each financial year, the ICB and its partner NHS trusts and NHS foundation trusts prepare a plan setting out their planned capital resource use;

- ensuring that the ICB and its partner NHS trusts and NHS foundation trusts exercise their functions with a view to ensuring that, in respect of each financial year local capital resource use does not exceed the limit specified in a direction by NHS England;
- ensuring the ICB has a documented property transfer scheme for the transfer of property, rights or liabilities from ICB's predecessor clinical commissioning group(s);
- ensuring that there is an effective appraisal and approval process in place for determining capital expenditure priorities and the effect of each proposal upon business plans;
- ensuring that there are processes in place for the management of all stages of capital schemes, that will ensure that schemes are delivered on time and to cost;
- ensuring that capital investment is not authorised without evidence of availability of resources to finance all revenue consequences; and
- for every capital expenditure proposal, the CFO is responsible for ensuring there are processes in place to ensure that a business case is produced.

12.1.2 Capital commitments typically cover land, buildings, equipment, capital grants to third parties and IT, including:

- authority to spend capital or make a capital grant; and
- authority to enter leasing arrangements.

12.1.3 Advice should be sought from the CFO or nominated officer if there is any doubt as to whether any proposal is a capital commitment requiring formal approval.

12.1.4 For operational purposes, the ICB shall have nominated senior officers accountable for ICB property assets and for managing property.

12.1.5 ICBs shall have a defined and established property governance and management framework, which should:

- ensure the ICB asset portfolio supports its business objectives; and
- comply with NHS England policies and directives and with these SFIs.

12.1.6 Disposals of surplus assets should be made in accordance with published guidance and should be supported by a business case which should contain an appraisal of the options and benefits of the disposal in the context of the wider public sector and to secure value for money.

12.2 Grants

12.1.1. The CFO is responsible for providing robust management, governance and assurance to the ICB with regards to the use of specific powers under which it can make capital or revenue grants available to:

- any of its partner NHS trusts or NHS foundation trusts; and
- to a voluntary organisation, by way of a grant or loan.

12.1.2 All revenue grant applications should be regarded as competed as a default position, unless there are justifiable reasons why the classification should be amended to non-competed.

13. Legal and insurance

13.1.1. This section applies to any legal cases threatened or instituted by or against the ICB. The ICB should have policies and procedures detailing:

- engagement of solicitors / legal advisors;
- approval and signing of documents which will be necessary in legal proceedings; and
- Officers who can commit or spend ICB revenue resources in relation to settling legal matters.

13.1.3 ICBs are advised not to buy commercial insurance to protect against risk unless it is part of a risk management strategy that is approved by the Accountable Officer.

14. Use of seal and authorisation / execution of documents

14.1.1 The ICB will use a seal for executing documents where necessary. The use of the seal must be approved by the CEO or the CFO, and the sealing of any document must be witnessed by a member of the Governance, Risk and Legal Services Team.

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14.1.2 The Chief People Officer shall keep a register in which he/she shall enter a record of the sealing of every document.