



National Audit Office

The UK's independent public spending
watchdog

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Date 28 January 2026

LATE SUPPLIER PAYMENTS - NAO

Thank you for your FOI request received on 2 January 2026 for information about late supplier payments. We have considered your request under the terms of the Freedom of Information Act 2000 (FOIA). Your specific request is set out at **Annex A** where we have provided our responses to your points.

We have searched our records and compiled the list in response to points 1-6 and 8 of your FOI request. Please find these details in the attached Excel Spreadsheet which accompanies our response.

In terms of your request, between 1 April 2019 and 9 January 2026, the NAO received 18,254 valid invoices. Of these, 895 were paid more than 30 days after receipt, representing about 5% of the invoices processed in the period.

The information provided shows the invoices that have not been paid within 30 days of date of receipt; however, it does not distinguish between invoices that were queried thereby delaying payment, or those which have been disputed. Therefore, the information provided contains invoices where payment exceeds 30 days for valid reasons. The NAO aims to pay all undisputed invoices within 30 days, in line with Government prompt payment targets.

Definition of data fields

The data fields requested are defined as follows:

- **Supplier name:** Name of the supplier recorded in our system.
- **Invoice date:** The date shown on the supplier's invoice.
- **Invoice received date:** The date the NAO Finance Team received and recorded the invoice.
- **Invoice due date:** 30 days after the later of the invoice date or the invoice received date.
- **Gross invoice value:** The total value of the invoice, including VAT.
- **Payment date:** The date the NAO paid the invoice.
- **Number of days to pay:** The number of days between receipt of the invoice and the payment date.

We consider the information you have requested at point 7, 'payment terms' to be exempt from disclosure

under section 12 of the FOIA. The FOIA provides a legal right of access to recorded information held by a public authority, but it is subject to certain exemptions that may apply. While we hold information in scope of your request, we are refusing to supply some of the information you requested under section 12 cost of compliance under the FOIA.

This information is not readily available from our purchase ledger system, and to compile the details would entail searching every individual contract record. As your request currently stands, we would need to extract and review a huge amount of data to comply with this request. The cost of extracting the information from our computer systems would be above the appropriate cost limit set out in section 12 of the FOIA. Details of this exemption and how it applies to your request can be found at **Annex B**.

You may wish to submit a refined, more focused request. However, it is likely that if it relates to the same subject matter and content, the same exemption will be applied.

I hope this information is useful and you are happy with the way we have handled your request. If you are not happy with this response, you can ask for an internal review within 40 working days by writing to the NAO FOI Team at FOI@nao.org.uk. If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The primary way of escalating your concerns to the Information Commissioner is at: <https://ico.org.uk/foicomplaints>.

Yours sincerely,

FOI and Correspondence Manager

Annex A

We request under FOIA that you provide, (in a machine readable format, preferably Microsoft Excel or CSV) the following information in respect of suppliers which were not paid in within 30 days for the period starting 1 April 2019 to the date of this request:

1. Supplier Name
2. Invoice Date
3. Invoice Received Date
4. Invoice Due Date
5. Gross Invoice Value
6. Payment Date
7. Payment Terms
8. Late Payment Compensation or Interest Paid (if any)

Clarification:

We reiterate that this request:

(a) is limited to information which should (if proper records are kept) be readily available from a purchase ledger system and should therefore be possible to retrieve without any difficulty and without imposing any significant burden;

(b) relates to organisations (not individuals) who are entitled to be paid out of public funds for public services, and we do not require the disclosure of any personal information of any individual person;

(c) does not require the disclosure of any confidential information or information to the production of which there could be any other lawful objection.

Annex B

This annex sets out the exemption that we have applied to your request

Section 12 Freedom of Information Act 2000 (FOIA)

Section 12(1) – (4) are as follows:

12. — (1) Section 1(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit.

(2) Subsection (1) does not exempt the public authority from its obligation to comply with paragraph (a) of section 1(1) unless the estimated cost of complying with that paragraph alone would exceed the appropriate limit.

(3) In subsections (1) and (2) “the appropriate limit” means such amount as may be prescribed, and different amounts may be prescribed in relation to different cases.

(4) The Secretary of State may by regulations provide that, in such circumstances as may be prescribed, where two or more requests for information are made to a public authority-

(a) by one person, or

(b) by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign,

the estimated cost of complying with any of the requests is to be taken to be the estimated total cost of complying with all of them.

Section 12 of the FOIA allows a public authority, such as the NAO, to refuse a request if the cost of complying with the request would exceed the 'appropriate limit' as defined by the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004.

The Regulations stipulate that the appropriate limit to be applied to requests received by public authorities such as the NAO is £450. For the purposes of the estimate, the costs of performing these activities should be estimated at a rate of £25 per hour. This is therefore equivalent to 18 hours work.

In estimating the cost of complying with a request for information, a public body can only take into account any reasonable costs incurred in:

- (a) determining whether it holds the information,
- (b) locating the information, or a document which may contain the information,
- (c) retrieving the information, or a document which may contain the information, and
- (d) extracting the information from a document containing it.

The section 12 exemption provides for a judgement to be made of whether the request will exceed the 18 hour threshold before any work is undertaken. To help us make this judgement we have estimated the time required to locate and retrieve the information you requested.

There is a large amount of material relevant to this request and the cost of complying with the request would be far in excess of the appropriate cost limit and furthermore, it would be disproportionately burdensome for the NAO to comply with in terms of resources and time.