

CORPORATE DEBT POLICY

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1. Introduction

- 1.1 Spelthorne Borough Council has a duty to ensure that all revenue owed is collected efficiently and effectively for the benefit of all our taxpayers. At the same time the Policy aims to prevent our customers from falling into debt. This is best achieved by adopting the principles of early contact and consolidated action.
- 1.2 In relation to Council Tax and Business Rates and Business Improvement District (BID) demand notices the recovery process is set out by law, so recovery notices will be issued in accordance with the legal timeframes. When contact is made by the customer the recovery process is explained and we would seek to encourage them to pay the current year and then aim to discuss a payment arrangement where arrears are outstanding.
- 1.3 We aim to be an outstanding organisation with regards to the collection of debt. The Policy outlines the use of best practice methods providing high standards of customer service dealing with all customers in a fair and inclusive manner, whilst giving careful consideration to the needs of vulnerable customers. We will treat individuals consistently and fairly, ensuring that individual's rights under Data Protection Act 2018, Equality and Human Rights Act 2010 are protected.
- 1.4 The Policy demonstrates and also supports the Government's agenda to provide solutions that have prevention and intervention as a foundation for public and service delivery to local people.

2. Scope

- 2.1 The Policy covers all debts owed to the Council including:
 - Business Rates.
 - Business Improvement District (BID)
 - Council Tax
 - Sundry Debts (Domestic & Commercial Charges/Rents)
 - Parking Fines
 - Housing Rents/Housing Benefit Overpayments
 - Housing Options
 - Independent Living

Please refer to Appendices 1-8 for the billing and recovery process

3. Purpose and Objective

- 3.1 The intention of the Policy is to provide clarity in our approach to the collection of outstanding debts.
- 3.2 The Policy supports prompt, effective and efficient billing, and recovery action, through making best use of available resources. Debts will be managed in accordance with legislative provisions and best practice, whilst ensuring high standards of customer service.
- 3.3 The policy should also have consideration for individual client circumstances in some cases where e.g., clients are vulnerable.

4. Principles

The Policy is strengthened by the following principles:

- 4.1 **Minimising debt;** we will aim to reduce the levels of arrears, bad debt provision and write-offs. We will take an open-minded effective approach, providing consistency in the way customers in debt are dealt with across the Council, and support our customers to manage their priority debts.
- 4.2 **Proactive approach;** we will ensure customers are promptly made aware of their liabilities, being approachable and to encourage customers to contact us at the earliest opportunity. This will enable our officers to take into account customers circumstances of their ability to pay by offering more methods of ways to pay for example monthly fortnightly and weekly payment arrangements. These greater measures of ways to pay, will help customers to manage their finances and could reduce hardship, by agreeing to payment arrangements with more realistic repayments plans that assist the customer in managing their individual financial circumstances.
- 4.3 **Preventative measures;** we will advise on any housing assistance or taxation discounts; reliefs and exemptions customers may be entitled to. We will assist with applications when appropriate and signpost customers to money advice, debt counselling and other support services available through our partners and in the voluntary sector, when additional assistance may be required.

5. Debt Priority

- 5.1 It is not the size of a debt that denotes it as a priority, but the result of the action e.g., rent arrears resulting in loss of home. We will prioritise (e.g., apply payments to) debts in the order as shown in the table below:
 - 1. Mortgage or Secured Loan
 - 2. Rent

3. Council Tax
4. Gas and Electricity
5. Court Fines
6. Maintenance arrears
7. HMRC

6. Providing Support and Advice

- 6.1 We will ensure that staff are well versed in dealing with our customers and will encourage customers to make contact with us as soon as they begin experiencing difficulties paying their accounts.
- 6.2 Our bills and letters will clearly show how the amount has been calculated and we will make them as easy to understand as possible.
- 6.3 We will also advise individuals and businesses of the range of other discounts, reliefs and reductions available at the time an account is issued and also in subsequent communications.
- 6.4 During both face-to-face contact and telephone communications, officers will direct customers as to where they can obtain further specialist advice on benefits and debt matters appropriate to their needs. On-line signposting will also be available to other agency websites, such as:
 - [Citizen Advice](#)
 - [Money Advice Service](#)
 - [Step Change](#)
 - Armed Forces – [Royal British Legion](#) and/or [SSAFA](#)
 - and other appropriate support organisations (See [Appendix 11](#))
- 6.5 Where appropriate we will work with other agencies to assist customers who are receiving help and liaise with them on a local level to solve issues and answer queries.
- 6.6 We will keep up to date with, and where possible, sign up to current best practice.

7. Customers with Multiple Debts

- 7.1 The Policy promotes a flexible approach to working with customers to agree the steps that need to be taken to help address multiple debts. In taking this approach debt management will vary from debt to debt as different solutions will be required, although staff are not trained debt counsellors, we will be able signpost them to help organisations detailed in [Appendix 11](#)
- 7.2 There is currently a consultation document out now by HM Treasury called Breathing Space Scheme, once responses to the proposal have been

received the government intends the scheme to be implemented on the 4th May 2021. We will revise our Policy if required in response to the finalised scheme.

- 7.3 Breathing Space is a period of time during which an individual in problem debt is given a period from creditor action for a period of 60 days. This allows space for the individual to fully engage with debt advice and seek a sustainable solution to their debts.

8. Assessing the Customer's Ability to Pay

- 8.1 During the process of recovery, we will act in accordance with statutory regulations and advice issued by professional bodies e.g., Citizens Advice, Money Advice Service, and Money & Pensions Service.
- 8.2 When recovering multiple debts, we will endeavour to break the cycle of debt more specifically towards Council Tax and Business Rates by encouraging payment for current year, and then work with the customer to achieve an acceptable payment arrangement for recurring debts such as rent and Council Tax to be reduced within the customer's means, whilst ensuring a satisfactory level of repayment for the Council.
- 8.3 We will review payment arrangements to offer flexible options, including different payment dates and amounts to assist those on irregular incomes.
- 8.4 We will endeavour to make payment arrangements with customers who are unable to settle their debt(s) in full. However, this may involve legal action being taken against the customer where appropriate.

9. Supporting Vulnerable Customers

- 9.1 We will ensure that arrears are pursued in a timely manner with a firm but fair approach. It is Council policy to try to balance customer care with the responsibility of collecting the tax efficiently. We endeavour to be responsive to individual circumstances wherever possible. Our current collection rates are very good.
- 9.2 We recognise that everyone will require a more sensitive and considered approach to our customers and that some customers do not pay their debts for a variety of reasons. This may include poverty or other financial hardship, which we will endeavour to balance their circumstance against our duty to collect.
- 9.3 Spelthorne Borough Council Customer Services does manage a hardship policy and funds of £30,000 which is designed to help those who currently believe they are unable to pay because of hardship. The fund considers a one-off payment to help reduce the level of arrears with the view to educating the customer to pay their arrears through an agreed payment plan.

- 9.4 Vulnerability does not mean that a person will not be required to pay amounts they are legally obliged to pay. The cause of vulnerability may be temporary or permanent in nature and the degree of vulnerability will vary widely.
- 9.5 Whilst there are several characteristics which may cause an individual to be judged as vulnerable, we will consider each case on an individual basis, and take all relevant factors into account.
- 9.6 Whilst there is no legal definition of a vulnerable person. Generally, persons considered vulnerable are likely to be those who:
- a) Are elderly.
 - b) Appear to be physically or mentally ill, severely disabled or suffering mental confusion.
 - c) Have young children and severe social deprivation is evident.
 - d) Are heavily pregnant.
 - e) Are in mourning due to recent bereavement (of immediate family).
 - f) Have difficulty communicating e.g., due to profound deafness, blindness, or language difficulties.
 - g) Are in receipt of state benefits and/or on a low income and severe social deprivation is evident; and/or
 - h) Are suffering from long term sickness or serious illness including the terminally ill.
 - i) Are in a refuge.

10. Debt Recovery and processes

- 10.1 We will ensure that our customers are aware when enforcement action is near to give our customers every opportunity to bring their account up to date. Costs raised in relation to Council Tax generates an income of around £165,000 per annum. We will take enforcement action when our communications are ignored if needed.
- 10.2 The Council will contact promptly in writing, within the appropriate legislative procedures such as timescales, any person or organisation that fails to make a payment will be informed that the payment is overdue, and what the next course of action may be.
- 10.3 Where collection of the outstanding amount is increased due to costs being incurred the person(s) or organisation, will be responsible for payment of all costs incurred, in addition to their outstanding balance.
- 10.4 A range of recovery options will be used to secure payment for Council Tax and Business rates, discretionary arrangements have failed, such as making an application for a liability order (an order made by the Magistrates Court which gives the Council the power to take further action to enforce payment) the following recovery measures could be considered:

- Attachment of Earnings Order
- Deductions from Benefits
- Enforcement Agent
- Charging Order
- Insolvency (Bankruptcy) action debts over £5,000
- Securing the debt by obtaining charging order against property, that's a consequence of a Bailiff action.

10.5 We will only employ certificated enforcement agents who comply with the taking Control of Goods Regulations 2014 and will ensure they act to the standard Code of Practice with the authority which protects our customers.

11. Evasion and Fraud

- 11.1 The evasion of payments owed to the Council reduces the financial resources available to the Council, this has a direct impact on all our residents, businesses and other organisations that rely on Council services.
- 11.2 Evasion or fraud to avoid payment will not be tolerated and where this is identified then in addition to enforce payment, the Council will seek to impose such further penalties or sanctions as the law allows. We are currently in partnership with Reigate and Banstead Borough Council where referrals are made to them for Business Rates, Council Tax and Housing Overpayments for the investigation and detection of fraud being made.

12. Write-off Policy

- 12.1 The Council recognises that a small proportion of its overall debt may not be collectable due to matters beyond its control and where a debt is assessed to be irrecoverable it will be considered for write-off. However, the Council will seek to minimise the cost of write-offs by taking all appropriate action to recover what is due.
- 12.2 Furthermore, if a debt is written off but circumstances change such debts will be considered for write-on and pursued to the full extent of the law. An example of when this may occur is if a debtor absconds with no forwarding address but is subsequently traced. A further example would be in insolvency cases where an individual/company goes bankrupt or is made insolvent, partial/full dividend(s) can be received many years later.
- 12.3 All officers, members and contractors will ensure that they have no work-related involvement with any account involving any relatives, friends, close associates, organisations of which they or their relatives are members or previous employees of. This includes making any decisions on how money owed to the Council is collected and recovered.

12.4 Please refer to write off policy in [Appendix 9](#)

13. Right to offset

13.1 The Council will transfer any credit that is on an account to pay off other debts that are owed to the Council this is known as the right to “offset” or to combine accounts. Before using the right to offset consideration should be given as to whether a customer is in financial difficulty and that they have enough money to cover reasonable day to day priority debts such as:

- Mortgage
- Rent
- Council Tax
- Food Bills

14. Monitoring Performance

14.1 The collection of Rent, Council Tax, Non-Domestic Rates and Sundry Debts are all under public scrutiny as Key Performance Indicators (KPIs). The efficiency of this policy and associated procedures will be monitored through the following KPIs, which are currently reported quarterly as part of the Corporate Performance framework:

- % of Council Tax debt recovered
- % of Non-domestic Rate debt recovered
- % of BID debt recovered, and
- % of Sundry debt recovered
- % of Housing Benefit overpayment

15. Equality Duty

15.1 Under the Equality Act 2010, the Council, in exercising any of its functions, must have due regard to the need to:

- Eliminate unlawful discrimination
- Advance quality of opportunity; and
- Foster good relations between people of different background
- Be fair to all

16. Use of data

16.1 The Council will collect and store personal data for the purposes of the effective billing, collection, and recovery of sums due. Data retained for this

purpose will be processed in accordance with the Data Protection Act 2018 and will be stored securely at all times.

- 16.2 Data will be shared with agents or contractors appointed by the Council for the purposes of the billing, collection, and recovery of sums due. Data may also be shared within the Council or with external organisations where the law allows and in particular where it is in the interests of the debtor or where it will prevent fraud or the unlawful evasion of payment of sums due.

17. Review

- 17.1 This Policy will be monitored and regularly reviewed and updated where necessary to take account of changes in legislation and best practice. A full review of the Policy will be scheduled for 1st December 2022 from its introduction.

Appendices

Appendix 1 - Business Rates/BID Recovery

The bills for Business rates and for any BIDs operating within the Borough, are issued on an annual basis and the responsibility for issuing bills and the collection and recovery of debt is held by the Chief Finance Officer. business rates and BID levy payments are payable in line with legislative requirements.

The business rates bill will detail when instalments are due to be paid and the methods which can be used to pay, whereas the BID levy payment is payable in one instalment. If an instalment for either business rates or BID are not paid on time, then a reminder will be issued following non-payment.

Only one reminder notice will be issued for business rate bills and those of BID; any further default will result in a final notice being issued. A final notice withdraws from the customer the right to pay by instalments for business rates and requires full payment of the outstanding amount to be made within seven days. The enforcement action to be taken BID mirrors that of business rates and therefore the final notice issued will give the ratepayer their final opportunity to settle the outstanding levy payment. If the business rate account or the BID levy payment remains unsettled, the Council will make a complaint to the Magistrates Court by the issue of a summons notice for an application to apply for a liability order to be granted.

The Liability Order enables the Council to consider other enforcement remedies for example: instructing enforcement agents to collect the balance of debt that is outstanding.

If an appeal is made against the rateable value to the independent Valuation Officer, payment must still be made against both the business rates and the BID account until the appeal is settled.

Enforcement agents will be appointed based on the contracts which have been procured in line with contract procedure rules. Enforcement/agent's performance and contract management will be in place to ensure compliance with codes of conduct and good practice. Enforcement/agent's services will comply with the Taking Control of Goods: National Standards, issued by the Ministry of Justice.

Appendix 2 - Council Tax Recovery

The responsibility for the issuing of council tax bills, its collection and recovery of debt is held by the Council's Chief Finance Officer.

The Council will issue a council tax bill, which will give instructions on when the instalments are due to be paid. The preferred method of payment for council tax is direct debit and flexibility is available on the date on which the direct debit is collected. Unless paid by Direct Debit the first instalment is due by the first of the month.

A reminder notice will be issued if an overdue instalment is not paid within seven days of the instalment due date. If the instalment is paid as requested, then no further action will be taken. If the instalment is not paid or only partly paid, recovery action will proceed to the summons stage. Within a council tax year (April – March) only two reminders will be issued for late payment of instalments.

A final notice will be issued on the third occasion that an instalment is paid late. The final notice will be a request for the full balance to be paid. The balance must be paid within seven days of a final notice being issued.

If payment is not received within 14 days after the first or second reminder notice or within seven days of a final notice, the Council will take legal action and a summons will be issued against the customer. All costs incurred are recoverable by the Council and will be added to the amount due when the summons is issued.

The Council reserves the right to take recovery action where a customer does not pay and does not indicate that they are having trouble paying. Customers are informed of:

- entitlement to housing and council tax support and other income related benefits
- discounts, reliefs, and exemptions

The ability to refer debt to an enforcement agent is an important tool in the recovery process. The Council appreciates the sensitivity attached to the use of enforcement agents and will only use them if it is deemed necessary. The Council will seek to use enforcement agents only where it has been determined that this is the most effective collection method for the debt in question.

Enforcement agents will be appointed based on the contracts which have been procured in line with contract procedure rules. Enforcement/agents performance and contract management will be in place to ensure compliance with codes of conduct and good practice. Enforcement agent's services will comply with the Taking Control of Goods: National Standards, issued by the Ministry of Justice.

Appendix 3 - Sundry Debts Recovery

The responsibility for the raising of sundry debts against a debtor account is set up by Customer Services, each service will request for an invoice to be raised via a 'Finance Sundry Debt' form that can be found on Spelnet via [online forms](#).

The overall responsibility for the collection and recovery of sundry debt is held by the Council's Chief Finance Officer. Customer Services will be responsible for ensuring that assistance/guidance is provided to the Group Heads/senior managers for each service in recovering the debt due to their Service, where appropriate.

Wherever possible, Spelthorne Borough Council should endeavour to obtain payment in advance or at the time when a service is delivered.

The council will only raise a debtor's invoice where payment in advance for a service is inappropriate. All sundry debtor invoices must be raised using the corporate sundry debtor's system.

The general settlement terms for sundry debtors are 21 days from the date of the invoice, there are on odd occasions other dates, these are specified by the individual service areas.

A reminder notice will be issued to the debtor, 21 days after the invoice date, which requires the account to be brought up to date within seven days. Some service areas do fall within vulnerable groups, where this applies, no further notices are issued.

A final notice letter will be issued after a further period of 14 days which will give a further seven days for the account to be brought up to date.

A further final notice before recovery action is sent asking for payment within seven days.

At this stage an arrears analysis report is run for all outstanding debts that are at reminder letter three stage. This is produced on a quarterly basis and forwarded to the Group Heads/senior managers for them to consider the next recovery action they would like to take.

All Service areas are required to return this report within four weeks, failure to do this, will result in Customer Services exercising their professional judgement as to what action should be taken. The Council's Corporate Debt Group will receive regular aged debtor reports and monitor performance.

The recovery options are as follows:

- Letter before action allowing the debtor 14 days to pay
- Referral to the Council's approved debt collection agent (where additional costs may be incurred)
- A Collection Agency

- Money Advice Service (previously known as County Court action seeking a Judgement e.g., Attachment of Earnings)
- Refer to the Council's own Legal Team.

The list is not exhaustive, and the Council will seek to recover outstanding debt via the most practical and cost-effective manner. Where debt proves uneconomical to collect or the debtors have absconded, we would have to consider to write-off the debt in accordance with the Council's write-off Policy.

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Appendix 4 - Policies Specific to Unpaid Parking Penalties

Spelthorne Borough Council undertakes parking enforcement to control and regulate parking in its off-street car parks and on the streets in Spelthorne as the enforcement agent for Surrey County Council. This enforcement is necessary to minimise dangerous and inconsiderate parking on our roads and in our car parks. The Council employs its own Civil Enforcement Officers we also employ temporary Civil Enforcement Officers from time to time from Unity.

Where a Civil Enforcement Officer discovers a car parked in contravention of a parking control, they are required to issue a Penalty Charge Notice.

After a Penalty Charge Notice has been issued, and if it is not cancelled by the Council within the appeals process or paid within statutory timescales (about 60 days from the date of its issue), parking law makes provision for the unpaid Penalty Charge to be referred to the Traffic Enforcement Centre (TEC) for registration of the civil debt and application for an Order for Recovery.

To ensure that appropriate arrangements are in place for the recovery of the debt the order/warrant will be referred to a bailiff company to be executed.

This Policy aims to ensure that the arrangements and activities undertaken in seeking to recover the Debt:

- are applied in a fair and equitable way
- comply with the law, guidance and local policies including the Enforcement Concordat, and the Council's Finance Procedure Rules and the Corporate Debt Policy
- maintain public confidence in parking enforcement processes
- encourage the prompt payment of otherwise undisputed parking penalties.

It is normal practice to appoint one or more bailiff companies that are specialised in the recovery of traffic and parking enforcement debts. The Council will incur no direct cost as a result of the bailiff companies' services since their charges are passed on to the debtor, with the level of these charges being set by regulation.

A good working relationship and good communication is maintained with bailiffs to ensure that public queries are dealt with quickly to establish in advance of its execution that the Warrant is still appropriate and necessary.

In the first instance where the debt is not settled by way of a cash or similar payment, bailiff action may include the removal and sale of goods up to the value of the total of the outstanding debt and subsequent bailiff charges. The Council will only consider authorising the bailiff company to clamp or remove a vehicle in circumstances where the vehicle owner has incurred multiple debts with the Council and where there are three or more outstanding Warrants. However, this will be avoided where it is proved that the vehicle is essential for the employment of the debtor.

The Parking Services Section will, at every stage of the recovery process, consider any information from the bailiff company or the debtor and reserves the option to agree to either defer or to cancel a debt if circumstances justify this. At their discretion bailiffs are authorised to set up payment plans to encourage payment of debts where there is a proven claim of financial hardship. Where the debtor's particular circumstances will be treated on their individual merits, ideally supported by documentary information, for example proof of bankruptcy.

If during the execution of a Warrant, the bailiff receives new information in regard to the case, i.e., a new address for the debtor, the bailiff company are required to refer the case back to the Parking Services Section for review before further debt recovery action can be undertaken.

Warrants that the bailiff company are unable to recover are classified as "no trace" or "executable" and are returned to the Council. These can be either:

- i) Reviewed and either be passed to a second bailiff company
- ii) Referred to the Traffic Enforcement Centre after 12 months (on expiry of the initial warrant) for a further warrant application
- iii) Recommended to be "written off" as unrecoverable.

It is anticipated that unless special circumstances apply in the main most cases will follow the course of item iii.

The debt recovery process will be monitored and reviewed to ensure that the bailiff's performance is at a level consistent within the industry. Benchmarking will be sought between other similar Surrey Boroughs and Districts to ensure performance and quality. A recovery rate of approximately 25% is expected based on payment rate of the number of debts referral per annual.

Complaints against bailiffs monitored will be dealt with in accordance with the Council's customer service standards and complaints procedures.

The Council's Corporate Debt Group will receive regular aged debtor reports and monitor performance.

Appendix 5 - Housing Benefits Overpayment Recovery

Policies Specific to Recovery of Benefit Overpayments

Overpayments of Housing Benefit and Council Tax Benefit/Support are established through a change in benefit entitlement. They are described as an amount of benefit that has been awarded but to which there is no or reduced entitlement under the regulations.

The Council believes that the prevention of overpayment debt is better than the cure

Therefore, measures are to be employed to prevent overpayments occurring. These will include:

- Using a well laid out application form to collate accurate information which contains an unambiguous statement that failure to provide correct information could lead to overpayments of benefit and to prosecution.
- Ensuring all benefit notification letters and relevant correspondence informs the people affected of their responsibility to tell the Council of any change of circumstances that may affect their claim.
- Making use of reasonable evidence in support of claims and changes or circumstances for example:
 - using checks for identity
 - residency and National Insurance numbers
- Targeted interventions that are risk profiled where possible and appropriate.
- Ensuring all staff involved with overpayments receive, suitable training with comprehensive access to overpayment recovery procedures and an awareness of problems relating to debt.
- Providing fraud awareness training for staff.

Using and developing information technology to automate the identification and recovery of overpayments and to reduce error:

- Including publicity material and information on responsibilities for reporting changes of circumstances.
- Ensuring that benefit awards are suspended and terminated in line with current regulations and case law.
- Dealing as quickly as possible with reported changes of circumstances.
- Participating in various data matching exercises with external agencies and cross matching against internal databases whilst adhering to principles laid down by the Data Protection Regulations 2018, Data Protection and Human Rights Act 1998.

The Council aims to calculate overpayments quickly and accurately and to provide quality information to the people affected, ensuring it recovers the correct amount. To achieve this, the Council will:

- Invite claimants to apply for underlying entitlement.

- Calculate the overpayment, on average, within 14 days of receiving all necessary information.
- Use the proper effective date of change to fix the correct overpayment period.
- Consider uncashed or returned cheques or underpayment of benefit.
- The Council aims to ensure the correct classification of overpayments for subsidy purposes is always used to prevent loss of subsidy.
- All necessary invoices, reminders and pre-debt collector stage letters/Financial Enquiry will be raised according to recovery stage, using the Housing Benefits and Debt Management system.
- Invoices will only be issued when the overpayment cannot be recovered from benefits.

The Council has a responsibility to act in accordance with all relevant legislation and regulations, when recovering overpayments.

Social Security Administration Act 1992.

Social Security Administration Act 1992 (Housing Benefit).

Social Security Administration Act 1992 (Council Tax Benefit).

Social Security Contributions and Benefits Act 1992.

The Housing Benefit (General) Regulations 1987 - and subsequent varying regulations.

The Council Tax Benefit (General) Regulations 1992 - and subsequent varying regulations.

Housing Benefit (Recovery of Overpayments) Regulations 1997.

Social Security (Overpayment and Recovery) Regulations 2013.

The Housing Benefit and Council Tax Benefit (Decisions and Appeals and Discretionary Financial Assistance) (Consequential Amendments and Revocations) Regulations 2001.

Welfare Reform Act 2012.

Housing Benefit Overpayment Guide 2015.

Where the Council decides an overpayment is recoverable, the most appropriate method of recovery will be considered in all cases and arrangements will follow the general hierarchy below:

- From arrears of Housing Benefit.
- On-going deductions from further payments of continuing Housing Benefit. This will include payments that are sent directly to the Landlord on the claimant's behalf. The Council will base recovery rates as laid down by regulation and will initially seek to recover the standard weekly deduction calculated, unless the health or financial circumstances of the claimant suggests, a more appropriate rate should be used. In all cases, however, a minimum amount of fifty pence per week Housing Benefit must remain in payment. The debtor has the right of appeal against the rate of recovery chosen by the Council.
- Overpayments of recoverable Council Tax Benefit/Support, apart from in exceptional circumstances, will result in an adjustment being made to the respective Council Tax account for the appropriate year. An amended bill

will be issued, and any unpaid monies will be subject to recovery action under the Council Tax regulations.

- By deductions from certain Department of Work and Pensions benefits. Section 75(1) of the Social Security Administration Act 1992 allows recovery of overpaid Housing Benefit by deduction from prescribed benefits which are defined in Regulation 105 of the Housing Benefit Regulations 2006.
- As of 8 April 2013, Sections 105 and 106 of the Welfare Reform Act 2012 amends the Social Security Administration Act 1992 allows the Council to recover by attachment of earnings without court authority. Known as Direct Earnings Attachments (DEA), their primary purpose is to enforce recovery where a liable person is in Pay as You Earn (PAYE) employment.
- Referral to an external debt collection agency (after all the above avenues of recovery are considered and/or exhausted).
- In extreme circumstances Civil Proceedings Application to the County Court for a County Court Judgement (after all avenues of recovery are considered and/or exhausted). With a County Court Judgement (CCJ) further recovery actions can be taken, e.g., application to the High Court to instruct High Court enforcement agents.

The Housing Benefit (Recovery of Overpayments) Regulations 1997 provide for the opportunity if deemed appropriate for the Council to recover overpayments from landlords, when the landlord has been classed as responsible for their current tenants' entitlement. The Council will, in appropriate circumstances, reduce payments to landlords for their current tenants to recover overpayments that arose for former tenants, known as 'blameless tenant,' recovery. It will take this action when the original tenant has no continuing Housing Benefit entitlement.

We will ensure recovery is applied in a fair and equitable way. We will also set up payment plans wherever possible to encourage payment of debts considering the claimant's financial circumstances to try and prevent financial hardship but taking into account the need to clear any outstanding debt.

Only if after all attempts at recovering the overpayment have become exhausted and there is no hope of recovery, or there are qualifying circumstances, shall the debt be recommended for write-off.

Appendix 6 – Policies Specific to Recovery of Housing Options

SPELTHORNE RENT ASSURE CURRENT ARREARS PROCESS

The Rent Assure Scheme provides the Council with an avenue for homeless prevention by utilising the private rented sector to achieve tenancies, thus minimising the use of long-term bed and breakfasts placements or other temporary accommodation. It also enables us to end the main homeless duty by making a PRSO (private rented sector offer).

Two-year assured shorthold tenancies are arranged by the Rent Assure Team. An income and expenditure exercise are undertaken to ensure that the properties are affordable for the ingoing tenants, who are advised of the amount they are due to pay towards the overall rent cost.

The accounts are set up and monitored each week by the Tenancy Sustainment Officer and a series of letters sent out should any arrears accrue. Repayment plans are agreed for the arrears to be cleared, plus an amount for the ongoing rent costs.

Should the tenant default on this repayment plan, further letters will be sent, but ultimately will be issued with an eviction notice, through the Council's Legal Department, if payment is not forthcoming.

Following eviction, if a forwarding address is known, further recovery action will be taken and if after a series of letters there is no further payment, the case will be passed to Customer Services for further recovery action, unless the debit is less than £100, in which case the debt will be written off. If there is no forwarding address, and it is economical to do so, the case will be passed to Customer Service to attempt to gain a forwarding address and if successful recovery action will continue. If no forwarding address is found the debt will be sent for write off.

For tenants who leave the scheme as a natural progression at the end of the two-year period, and a forwarding address is known, recovery action will commence for any outstanding arrears in the form of a series of letters. In these cases, previous tenants will be encouraged to enter a payment plan to clear the arrears over a period, if it is not possible to clear immediately. If payment is not forthcoming, having received follow up letters, the case will be passed to Customer Services for further recovery action. For cases where the forwarding address is not known, details will be passed to Customer Services to attempt to find a current address and if found the recovery process will continue. If unsuccessful the debt will be sent for write off.

BED AND BREAKFAST & HOME PREVENTION LOAN ARREARS PROCEDURE

This area of the Council's sundry debt covers homeless applicants placed in emergency accommodation or those who are assisted with homeless prevention in the form of a loan. These are statutory services and the people assisted cover a wide age group, with a mixture of family groups and single applicants, some of whom have vulnerabilities and lead an itinerant lifestyle, affecting the ability for debt recovery.

For current placements in emergency accommodation, recovery action is monitored via the Income Recovery Officer on a weekly basis, with varying levels of arrears letters being sent out each week to encourage payment and seeking to arrange payments plans to cover the weekly charges plus an amount towards the arrears. If the applicant persists in non-payment, having taken account of possible vulnerabilities, the applicant will be asked to leave the accommodation on a given date unless payment is forthcoming.

For former applicants, having left the emergency accommodation either voluntarily or by prior arrangement, recovery action for any arrears will be commenced by the Income Recovery Officer. Where an address is known a series of letters will be sent to inform the applicant of what is owed and put a repayment plan in place if the debt cannot be cleared immediately. If the repayment plan is not adhered to, following the recovery letters being sent, cases will be transferred to Customer Services for further recovery action to be instigated if the debt is over £100. If under £100 the debt will be put forward for write off.

For those where a current address is not available, and the debt is over £100 (and economically viable to do so), the case will be passed to Customer Services to attempt to trace a forwarding address to be used for further recovery action to take place. If an address is not forthcoming, then the debt will be passed for write off.

Home Prevention Loans are given to prevent homelessness, usually from an existing private rental property, although there are other circumstances in which this budget would be used for homeless prevention. Loans are given as a one-off sum and therefore there is no ongoing debt, and the address of the applicant is known. At the time of arranging for the loan to be given a repayment plan is discussed between the Housing Options Officer dealing with the case and the applicant and a payment method arranged. The Income Recovery Officer will monitor the repayment of these loans monthly, as in most cases repayment is received monthly from the applicant. Arrears letters would be sent and if the repayment plan is not being adhered to the case would be passed to Customer Services for further recovery action.

Appendix 7 – Policies Specific to Recovery of Independent living

Spelthorne Borough Council offers several discretionary services. Though discretionary these services are essential to the wider community offer and are offered to our most vulnerable residents, including those who are elderly, frail those with multiple long-term conditions, those with a learning disability and those with mental health issues. As a result, recovery is very important to the service, we will be empathetic to the needs of our service users. A number of our services require our users to pay up front including community centre memberships, centre meals, and activities. As a result, they rarely require recovery.

Debts predominantly accrue through our SPAN service, Meals on Wheels, and the OPAL High Needs group.

To ensure that appropriate arrangements are in place for the recovery of the debt we will ensure.

- Recovery is applied in a fair and equitable way
- After non-payment of invoice the client will receive two appropriately worded debt recovery letters
- The administration lead for each of the service areas will then lead on telephone calls to collect debt based on evidence in relation to:
 1. Client capacity
 2. Vulnerability
 3. Impact of non-payment and service removal
- Encourage sign up to Direct Debit for ongoing debt and debt recovery.
- The administration lead for each service area will monitor if an invoice has not been paid. This should be outside of Sundry Debts as they will be providing you with a quarterly arrear's analysis report every quarter.
- It remains the responsibility of the Group Head who are the budget holders to ensure that there is a proactive approach to the collection of revenue that is owed to the council for providing a service, non-payment of an invoice requires monitoring, before the three-month arrear's analysis report is provided by Customer Services.

We will set up payment plans to encourage payment of debts where there is a claim of financial hardship or financial impact. Where the debtor's particular circumstances will be treated on their individual vulnerabilities.

Benchmarking will be sought between other similar Surrey Boroughs and Districts to ensure performance and quality.

The Council's Corporate Debt Group will receive regular aged debtor reports and monitor performance on individual Service areas.

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Appendix 8 - Code of Practice Enforcement Agent

Below is the Code of Practice detailing the practices to be followed by any Enforcement Agent acting for and on behalf of Spelthorne Borough Council

What happens if an enforcement agent is sent to my home?

As part of a liability order, enforcement agents can be sent to your home to seize your personal belongings should you be unable to set up a repayment plan.

There are three stages that enforcement agents follow:

1. Compliance stage

A written request is sent to pay your outstanding council tax and the compliance fees in full or to arrange a payment plan.

This written request is an official notice that an enforcement agent will visit your property in seven days to take control of goods if you do not respond.

A fee of £75 is added to your account balance at the compliance stage. Every time a liability order is passed from us to an enforcement agent a fee of £75 is charged to your account balance.

2. Enforcement stage

An enforcement agent visits your property and takes control of your goods - if you do not contact them within 7 days to pay the account in full or to arrange a payment plan.

If you arrange a payment plan, the enforcement agent may let the goods stay in your property and you enter into a Controlled Goods Agreement. This agreement means a list of all items is created. Should you fail to honour the payment plan then items can be taken.

If you do not pay in full or agree to a payment plan for the outstanding balance of your account, an enforcement agent can seize goods - up to the value of what is owed; this is known as Taking Control of Goods. The value of the goods may not be as much as you paid which means you will still have a balance to pay.

An enforcement fee of £235 is added to your account balance as soon as an enforcement agent visits your property for the first time. Should you owe more than £1,500 then 7.5% of the total amount above £1,500 along with the enforcement fee will be added to your account balance.

For multiple liability orders, only one enforcement stage fee is charged.

3. Sale or disposal stage

An enforcement agent attends your property to remove goods for auction or prepare goods to be sold – if the sale takes place at your home.

A fee of £110 is added to your account at the sale or disposal stage, for multiple liability orders, only one enforcement stage fee will be charged.

Should you owe more than £1,500 then 7.5% of the total amount above £1,500 along with the enforcement fee will be added to your account balance.

In addition to the above fees, enforcement agents may also recover fees for associated costs that are reasonable such as storage fees following removal of goods, locksmith's fees, and auctioneer's fees.

Please note: Once your account is passed to an enforcement agent your account balance and all fees must be paid to the enforcement agent, not the Council.

Should you miss an enforcement agent visit, their details will be left, and you should contact the agent to make payment or arrange another visit.

Debt unable to be recovered

The Council will seek to minimise the cost of write off to the local council taxpayer by taking all necessary action to recover what is due. All reasonable and economical debt recovery action will be taken before consideration is given to writing off a debt. The degree of enforcement will be dependent on the amount owed, the type of debt and the debtor's personal circumstances. This will be progressed in accordance with the Council's Scheme of Delegation.

Appendix 9 - Write-Off Policy

Review of irrecoverable debts

Despite our procedures for recovering debts there are always cases that may be deemed impossible or not cost effective to pursue. There are a variety of reasons why this might happen, these include:

- The amount outstanding is below an agreed lower limit less than £100.00
- The customer has left an address and we are unable to trace them.
- The customer has died and there are not sufficient funds from their estate to pay the amount owed.
- The customer is bankrupt or if the company is insolvent (however we do submit a claim in bankruptcy and any payments received from the receiver are credited to the account accordingly).
- It is uneconomical to pursue the debt.
- Health and financial considerations.
- Statute barred – an invoice is irrecoverable if six years have elapsed from the date of the invoice, date of service or last payment date, whichever is the latter. If the debt is acknowledged by the debtor, the six years runs from this date. All debts which are statute barred will be processed through the agreed write off procedures as irrecoverable.
- Official error Housing Benefit overpayments, where the customer could not reasonably be expected to know they were being overpaid.
- Housing Benefit overpayments where the authority decides that it is unreasonable to recover the debt.

We will monitor all outstanding debts to ensure that they are recoverable and will take prompt action when irrecoverable debts are identified to write them off in accordance with our financial standing orders.

Groups Heads and the Deputy Group Head for Customer Services and Deputy Chief Executive (Chief Finance Officer) have delegated authority to write off debts for individual outstanding balances up to the following values.

- Council Tax to the value of £5,000
- Business Rate to the value of £9,000
- Housing Benefits to the value of £5,000
- Sales Ledger to the value of £3,000

For write offs over these limits, a Cabinet report must be prepared in the required format.

Additional provisions to write off all debts without limit, where bankruptcy, liquidation proceedings, administration or receiverships proceedings have been instigated, as stated in the Delegations to Officers report section 3 updated 31/01/2018.

Where the court has remitted the debt, a copy of the court order should be sent to the Customer Services to do all other write-offs, should be prepared in the usual way, and checked by the Customer Services and Revenues Manager and then forwarded onto Deputy Group Head for approval.

The write off policy remains in force and for all write offs over £750, external checks such as Call Credit must be used.

All write offs submitted to the Sales Ledger Team must be authorised by the Group Head for their service area and will also require the signature of the Chief Finance Officer, quarterly reports as to the value of write offs made onto our systems will be reported to the Chief Finance Officer.

The formal 'writing off' of any debts will not rule out recovery action being taken in the event that a customer's circumstances change

Where there is an outstanding balance for closed accounts between the value of £0.01 and £100.00 the value of costs that would be added to an account if recovery were to take place. This amount would be written off without reference to the Group Head or Deputy Chief Executive /Chief Finance Officer.

Appropriate paperwork needs to be completed for checking by the Customer Services and Revenues Manager.

Accounts in Credit

As a matter of housekeeping there are times where we are unable to refund a credit that is on an account due to no forwarding address being provided.

A refund form should always be sent out in case a re-direction may be in place for the customer who has a credit on an account and every effort should be made to return the credit to the customer.

Where this is not possible a quarterly report should be identified of all credits with a view to consider writing these off our systems, we would need to liaise with our accountancy section regarding this to ensure the appropriate transaction code is used and authorisation is given by the Chief Finance Officer, this needs to be evidenced for audit purposes.

Appendix 10 - Way to Pay

Internet & Automated Telephone Payments

Payment by Debit or Credit Card can be made using the Council's Internet Payment facility using:

- our website <https://www.spelthorne.gov.uk/pay-online>
- or, by automated telephone service on 01784 444 220

These services are available 24 hours a day 365 days a year.

Direct Debit

The Council offers a choice of dates for payment by Direct Debit.

Standing Order

Obtain a standing order form from your bank and complete, instructing your bank to pay:

The Lloyds Bank

Account number 11441960

Sort code 308012

Always quote your Reference number. Return the completed standing order to your bank. It is your responsibility that the Standing Order is paid on time for the right amount.

Telephone Banking

Make a payment using any of the telephone banking services offered by most banks or building societies. Please make sure you quote your Council Tax Reference number together with The Lloyds Bank account number: 11441960 and sort code: 308012.

Post Office/Paypoint outlets

Payment can be made at most Post Offices by cash or cheque or at Paypoint outlets by cash only if your bill has a barcode printed on it. There is no fee for this service.

By Post (Do not send cash).

Cheques to be made payable to Spelthorne Borough Council and crossed "A/C PAYEE ONLY".

Please write your Council Tax Reference on the back of the cheque. If you would like a receipt, please be sure to include a self-addressed stamped envelope

Appendix 11 - Helping Customers to Pay

HELP WITH MANAGING YOUR MONEY AND DEBT

It is often the case that customers do not know where to turn if they are concerned about managing their money or they have debts, and many customers are not opting for advice that is available. Customers are still unwilling to access the services of a financial adviser or debt advisor which means customers make complex choices without support.

Ignoring the problem will not make it go away. Customers must ask for help and there are many organisations that can provide advice on welfare, debt, and money problems. Please note the following agencies/bodies:

Advice UK

Advice UK is a registered charity and is the UK's largest support network for free, independent advice centres.

For more details:

- visit their website <https://www.adviceuk.org.uk>
- call them on 0300 777 0107
- write to them at: Advice UK, 101E Universal House, 88 – 94 Wentworth Avenue, London, E1 7SA

Age UK

Age UK is a registered charity in the UK and is the country's largest charity dedicated to helping everyone make the most of later life.

For more details:

- visit their website: www.ageuk.org.uk
- call them on 0800 678 1602
- write to them at: Age UK, Tavis House, 1-6 Tavistock Square, London WC1H 9NA

Local – Age UK Surrey:

- visit their website www.ageuk.org.uk/surrey
- email enquiries@ageuksurrey.org.uk
- write to them at: Age UK Surrey, Rex House, William Road, Guildford. GU1 4QZ

Armed Forces – Service Charities

The Royal British Legion and SSAFA

- visit their website: www.britishlegion.org.uk/

- call them on 0800 802 8080
- visit their website: www.ssafa.org.uk/
- call them on 08007314880

Christians Against Poverty

Christians Against Poverty is a national Christian charitable company specialising in debt counselling for people in financial difficulty, including those in need of bankruptcy or insolvency regardless of their religious beliefs. It also provides other services and courses.

For more details:

- visit their website: <https://capuk.org/>
- call them on 01274 760720
- write to them at: Christians Against Poverty, Jubilee Mill, North Street, Bradford BD1 4EW

Citizens Advice

Citizens Advice (CA) to offer advice on financial advice and debt problems. The CA also provide a very wide range of advice on other money and non-money topics.

Your local Citizens Advice can be contacted at:

- www.citizensadvice.org.uk/

Runnymede and Spelthorne Borough Council's do support at a local level the following C.A.R.S service.

- Runnymede and Spelthorne Citizens Advice (Sunbury), Sunbury Library, The Parade, Staines Road West, Sunbury-on-Thames TW16 7AB
- <https://www.citizensadvice.org.uk/local/runnymede-spelthorne/>

Money Advice Service (MAS) (from 8 April 2019 Money and Pensions Service)

This is an independent service set up by the Government. The MAS provide a financial health check service. This can help you work out your financial priorities and make decisions about your money.

The MAS also have a budget calculator to help you to think about your spending and to work out whether you have enough money coming in to cover your outgoings.

For more details:

- visit <https://www.moneyadviceservice.org.uk/en/tools/health-check>
- call them on 0800 138 7777

National Debt line

This is a telephone-based service and is a national helpline for people with debt problems in Wales, England, and Scotland. They will discuss debt problems with you and explain the options available to you.

For more details:

- visit their website <https://www.nationaldebtline.org/>
- call them on 0808 808 4000 or have a web chat with an advisor
- write to them at: National Debt line, Tricorn House, 51-53 Hagley Road, Edgbaston, Birmingham B16 8TP

Payplan

Payplan provide free debt advice and management.

For more details:

- visit their website <https://www.payplan.com>
- call them on 0800 280 2816 or have a web chat with an advisor
- write to them at: Payplan Ltd, Kempton House, Dysart Road, PO Box 9562, Grantham, NG31 7LE

Shelter

Shelter is a registered charity that gives advice, information, and advocacy to people in need.

For more details:

- visit their website <https://england.shelter.org.uk/>
- call them on 0808 800 4444 or have a web chat with an advisor
- write to them at: 88 Old Street, London, EC1V 9HU

Step Change Debt Charity

The Step Change provides free debt advice over the phone. Everything is free and confidential, from budgeting advice to practical Debt Management Plans. This service is available to everyone in the UK.

For more details:

- visit their website <https://www.stepchange.org>
- call them on 0800 138 1111 or have a web chat with an advisor
- write to them at: Step Change Debt Charity, Wade House, Merrion Centre, Leeds, LS2 8NG

The Money Charity

The Money Charity provides information and guidance for people with debt or money worries.

For more details:

- visit their website <https://www.themoneycharity.org.uk>
- email hello@themoneycharity.org.uk
- call them on 0207 062 8933
- write to them at: The Money Charity, 15 Prescott Place, London, SW4 6BS

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Appendix 12 – Equality Impact Analysis

Directorate: Customer Services and Revenues Service Area: Customer Services	Lead Officer: Martyn Forward Date completed: April 2021
Service / Function / Policy / Procedure to be assessed: Corporate Debt Policy	
Is this: New / Proposed <input type="checkbox"/> Existing/Review <input checked="" type="checkbox"/> Changing <input type="checkbox"/> (Please tick appropriate box)	Review date: December 2022

Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

What are the aims and objectives/purpose of this service, function, policy, or procedure?

Review existing Corporate Debt Policy to improve collection for all Service areas and promote a more joined up working with regards to collection of outstanding debt across the Council.

Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	Yes	
Advancing equality of opportunity		No
Fostering good community relations	Yes	

If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete - please send a copy to Roy Tilbury. **If relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

PART B: Full Equality Analysis.

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

What outcomes are sought and for whom?	Greater understanding of amount of debt outstanding by service areas, provide greater transparency of the Group Head of a service, to reduce debt owed by the service in a timelier manner. Engage with our customers with equality and fairness in promoting more positive solutions to managing their debt.
Are there any associated policies, functions, services, or procedures?	The corporate debt policy brings together all service areas where the agreed policy tackles all areas of debt that is owed to the Council as a whole and set guideline's as how collection of debt should be dealt with. It will also be monitored by the Corporate Debt Group on a quarterly basis where balances have not been reduced will be discussed as to how payment can be achieved.
If partners (including external partners) are involved in delivering the service, who are they?	N/A

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands', i.e., race, disability, gender, gender identity, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g., are there any significant gaps?

No

Has there been any consultation with, or input from, customers / service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

Consultation has been made with all Service areas and Group Heads and Managers and the Corporate Debt Group, regarding this document

Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?

No

Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

Barriers:

What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:

- **Where** you provide your service, e.g., the facilities/premises.
- **Who** provides it, e.g., are staff trained and representative of the local population/users?
- **How** it is provided, e.g., do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?
- **When** it is provided, e.g., opening hours?
- **What** is provided, e.g., does the service meet everyone's needs? How do you know?

* Some barriers are justified, e.g., for health or safety reasons, or might actually be designed to promote equality, e.g., single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified, then please indicate which they are and why.

Solutions:

What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:

- Other arrangements that can be made to ensure people's diverse needs are met.
- How your actions might help to promote good relations between communities.
- How you might prevent any unintentional future discrimination.

Equality Themes	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
Age (including children, young people, and older people)	Health and Mental Health Yes,	To have understanding in meeting specific individual needs. The Council's approach on debt would not discriminate against them specifically,

		but to ensure everyone is treated fairly and sensitively. The policy assists and signposts customer's to organisation's that can help them
Disability (including carers)	N/A	As above
Gender (men and women)	N/A	Depends on individual details
Race (including Gypsies & Traveler's and Asylum Seekers)	N/A	Depends on individual details
Religion or belief (including people of no religion or belief)	N/A	Depends on individual details
Gender Re-assignment (those that are going through transition: male to female or female to male)	N/A	Depends on individual details
Pregnancy and Maternity	N/A	Depends on individual details
Sexual orientation (including gay, lesbian, bisexual and heterosexual)	N/A	Depends on individual details

Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

- Quarterly arrears analysis report to be sent to all Service areas with a response from the Service area within a 4-week period, and arrears for all areas will be reported to the Corporate Debt Group on a quarterly basis.
- Handling of specific debt is undertaken at service level in an equitable manner for all so there is no specific actions to deal with those with protected characteristics

Step 5 – Monitoring

How are you going to monitor the existing service, function, policy or procedure?

Quarterly review of arrears for all services areas reporting to the 151 Officer of the Council and quarterly meetings held by the Corporate Debt Group.
Ongoing monitoring of complaints and issues in services to ensure there is no discrimination against any of the protected groups

Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale

Equality Analysis approved by:

Group Head:	Date:
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Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team and ensure the document is uploaded to the EA Register which will be available to the public: