



# Hinckley & Bosworth Borough Council

## **CORPORATE SUNDRY DEBT RECOVERY POLICY**

## **Contents**

- 1 Introduction
- 2 Key Principles
- 3 Aims of the Policy
- 4 Roles and Responsibilities
- 5 Regulations and Legislation
- 6 Links to other Policies and Strategies
- 7 Policies Relating to the Raising of Sundry Debts
- 8 Policies Relating to the Payment of Sundry Debts
- 9 Policies Relating to the Recovery of Sundry Debts
- 10 Policies Relating to the Write Off of Sundry Debts
- 11 Policies Relating to the Monitoring of Sundry Debt
- 12 Policies relating to the Social Welfare of Debtors

## **1. Introduction**

- 1.1. This Policy sets out the general principles to be applied in relation to sundry debt management across all services provided by this Council. . Sundry debts cover all debtors other than Business Rates, Council Tax and HRA Housing related debts (i.e. rent). It therefore includes a wide range of debts such as commercial premises rents, waste services, planning and building control fees. All budget holders must take note and apply this Policy to ensure that the Council maximises the collection of debts and income in the most efficient, fair, and cost-effective manner.
- 1.2. It is the Council's policy both to ensure that money owed to the Council is recovered so far as possible and to ensure that people receive benefits to which they are properly entitled.
- 1.3. Wherever possible the Council will distinguish between those who cannot pay their debts and those who will not pay them. Where genuine hardship exists, the Council's officers will adopt a sympathetic and reasonable approach, including referring them to the Council's Welfare Support Service.
- 1.4. This Policy sets out the general principles to be applied in relation to debt management across all services provided by the Council.
- 1.5. The management of income is a key business area for the Council. The Council collects income from many streams; some of this activity is governed by legislation while others by sound principles of financial management. The key to economic, efficient, and effective income management is the creation and maintenance of a clear framework that sets out the approach, principles, and strategy within which all activities will be conducted.
- 1.6. This Policy covers procedures relating to the sundry debt only. Additional policies relating to housing rent and revenues and benefits debts are in place.

## **2. Aims of the Policy**

- 2.1 The primary aim of the Policy is to issue debt invoices punctually and correctly, and to ensure the council collects all sundry debt owing to it promptly, effectively, efficiently, and impartially, ensuring fair treatment of all customers.
- 2.2 In order to achieve this aim the Council will:
  - Raise debts promptly and provide full information to debtors on the reasons for the debt and requirements to pay.
  - Recover all money outstanding in respect of debts owed to the Council.

- Ensure that appropriate enforcement action is taken to recover debts.
- Facilitate a coordinated approach to managing multiple debts owed to the Council, where possible.
- Ensure that the Council engages with debtors when enforcing debts to take appropriate action considering the individual circumstances of the debtor.
- Identify, where appropriate, the support which may be required for those owing money to the Council.
- Giving specific considerations to vulnerable customers where appropriate.
- Apply best practice to debt collection.
- Minimise the risk of bad debts.
- Ensure we make early contact to provide support and advice to avoid debt increasing.
- Encourage our customers to contact us and/or recognised advice agencies as soon as there is a problem and to encourage the use of external agencies to assist individuals.

### **3.Key Principles**

3.1. The council will follow the principles outlined below when recovering debt:

- Our action will be proportionate, allowing for a balance to be struck between the potential loss of income to the council and the costs of compliance.
- Our approach will be consistent, taking a similar approach in similar circumstances to achieve similar ends; this needs to be maintained, whilst at the same time considering the specific circumstances of each case
- Our actions will be transparent; helping people to understand what is expected of them and what they should expect from the council. It also means clearly explaining the reasons for taking any recovery/enforcement action.
- Additionally, our intention will be to be firm and fair, and our manner will be courteous.

3.2. Where necessary when working with debtors the Council will provide additional support with the aim of maximising their income by: -

- Providing welfare support advice to ensure the debtor is receiving any benefits, reductions and discounts they are entitled to.
- Promoting and referring debtors to agencies who can offer personal budgeting support / debt advice/ affordable credit.
- We will encourage people with payment problems to come forward early to discuss their individual circumstances.

- 3.3. The Council welcomes the involvement of welfare agencies where authorised by the debtor in connection with debts due to the Council. The benefits that these organisations offer both the debtor and the Council in prioritising repayments to creditors and in maximising income available to the debtor are recognised.
- 3.4. The Council supports the provision of advice from the following agencies and will work in conjunction with them for the benefit of the debtor.
- Age Concern
  - Citizens Advice Bureau (CAB)
  - Shelter

#### **4. Roles and Responsibilities**

- 4.1 The **Head of Finance** is the Council's Chief Financial Officer (section 151 officer) in accordance with the Local Government Finance Act. The Head of Finance is responsible for the organisation and supervision of all income arrangements, which includes proper accounting, management reporting, and collection arrangements. To achieve this, the Head of Finance assigns responsibility to budget holders of the team whose service provision gives rise to the debt or potential income with appropriate support provided by the Accountancy Manager and Income Officer.
- 4.2 **Budget holders** are responsible for notifying the finance team of any debt that is due. As the ultimate "owner" of the debts, budget holders should advise finance and legal of any circumstances relating to the debt or the debtor's position to inform them of the most effective method of debt recovery. Budget holders are responsible for requesting write-offs of debts when deemed irrecoverable. These requests should be sent to finance for authorisation by the Head of Finance.
- 4.3 Within the Council's finance team, the **Income Officer**, under the supervision of the **Accountancy Manager**, holds responsibility for administering the raising of debts and maintaining appropriate records. The finance team are responsible for the initial stages of debt recovery, as well as monitoring and reporting on the Council's aged debt position. The finance team will ensure that there are dedicated finance officers in maintaining the necessary separation of invoicing / pursuit of payment duties from the actual receipt of monies. All managers should be aware of the need to keep these two roles separate (segregation of duties).
- 4.4 The Council's **legal team** is responsible for evaluating and administering all legal proceedings relating to aged debt, as deemed appropriate in consultation with the finance team. Only debt where it is financially and economically not viable as the amounts involved in

recovery are greater than the debt outstanding should legal proceeding not be conducted.

## **5. Principles of Enforcement - all sundry debts**

- 5.1. Where a debt remains outstanding for a service provision and there is no statutory obligation to provide the service, consideration will be given to terminate the service until such time that the debt is brought up to date.
- 5.2. Costs incurred are the responsibility of the debtor. The aim of the policy is to minimise such costs wherever possible.
- 5.3. Payment orders made by a Court will take priority over any informal payment arrangement.
- 5.4. We will utilise all methods of recovery available including the use of legal proceedings and Enforcement Agents where appropriate.
- 5.5. Enforcement agents and debt collection agencies instructed by the Council will always be required to work within agreed guidelines, legislation, and Codes of Practice.

## **6. Links to other Policies and Strategies**

- 6.1 A number of Council policies and strategies contribute to and complement the Corporate Sundry Debt Recovery Policy and should be read in conjunction. These include:
  - Council Tax, Non-Domestic Rates (Business Rates) and Benefits Overpayments Recovery Policy
  - HRA Rent Arrears Policy.
  - Financial Procedure Rules
  - Corporate Anti-Fraud Policy
  - Anti-Fraud Framework
  - Whistle Blowing Policy
  - Equality Policy

## **7. Raising of Sundry Debts**

- 7.1 Budget holders are responsible for raising debtor invoices in their own service areas or notifying finance of the debt that is to be raised. When notifying finance, the following information should be provided:
  - The name and address of the debtor
  - The amount of debt to be raised.
  - Narrative to include on the invoice outlining the nature of the debt and which period (if applicable) the charge relates to
  - The purchase order reference as issued by the debtor (if applicable)

- The cost centre to which income should be receipted.
  - Any VAT rate should be applied.
- 7.2 All fees and charges should be raised in accordance with the Council's published Fees and Charges listing.
  - 7.3 Sundry debt accounts should only be raised where payment in advance for a service is inappropriate or there are alternative contractual arrangements in place, such as invoicing for rent or other supply in advance of that service being delivered.
  - 7.4 There is currently no minimum level for invoices. That said, budget holders should pay due regard to whether debts can be combined to achieve efficiency of processes.
  - 7.5 Debtor's invoices must be raised promptly and within one calendar month of the service provision. Budget holders must notify the Accountancy Manager and legal services when any contract, lease or arrangement is made, whose terms provide that the Council should receive money.
  - 7.6 Where a continuing supply is involved, invoices should be issued periodically, within five working days of the end of each period or, if payment in advance is appropriate, five working days in advance of the end of each period. The timing of invoices needs to take account of the Council's legal obligations under relevant legislation. In the case of accumulated invoices these should be raised, as far as possible, within 5 days of the last service date being charged.
  - 7.7 Where the potential for a statutory benefit or discount exists in relation to the debt, the budget holder is responsible for making the debtor aware of such opportunities and they will be assisted and encouraged to apply for these.
  - 7.8 Budget holders must ensure the Council is not breaching legislation by levying a charge for a service, or by pursuing recovery of sums arising from a service provision.
  - 7.9 The Civica system (or any replacement system that serves its function) will be used to raise invoices (and subsequent reminder letters), using approved Council Stationery.
  - 7.10 Every demand for money will be correctly addressed to the person who is liable to pay it. The name on the demand will be that of a person or body possessing "legal personality".
  - 7.11 Demands will, wherever possible, be issued on the day of production.
  - 7.12 All invoices issued by the Council will comply with the corporate style guidance and be readily identifiable as being from the Council. All bills

and notices will be clear, accurate and timely indicating what must be paid and when.

- 7.13 In the interest of economy and where appropriate all demands, reminders and final notices shall be issued by email as a preference or by 2<sup>nd</sup> class post unless contrary to regulations or other statutory or legal requirements.
- 7.14 All relevant information relating to a demand will be kept either in paper or scanned image format until at least six years after the demand is raised. If at the end of that six-year period the demand remains unpaid, the supporting documentation will be retained until either the bill is paid, or the debt is written off.

## **8. Payment of Sundry Debts**

- 8.1 The Council will encourage the most cost-effective payment methods with the emphasis being on unmediated electronic means where possible. "Unmediated" in the context of electronic payment methods means a method of payment that requires no human intervention by officers of the Council to achieve its crediting to the account in question.
- 8.2 Customers may request an instalment arrangement, even when they are not generally available. The responsible budget holder, in liaison with finance, will consider each request on the following basis: the instalment amount offered; frequency of the payments; and the likelihood of a customer meeting the arrangement. The Council's general terms will apply in each case. If the Council is unable to accept an instalment arrangement, the officer must give a clear explanation of this to the customer.
- 8.3 An agreed payment plan should be a realistic representation of what the debtor can afford to pay over the period agreed but should at the same time mean that the Council is recovering some of the debt. Agreed payment plans are mutually beneficial for both parties because:
- The Council can recover the debt, albeit over a longer period, and at the same time avoid the costs associated with enforcement action.
  - The debtor can make repayments that are within their means and at the same time avoid becoming involved in any more serious debt enforcement action.
- 8.4 All debts should be paid in full by the due date. Therefore, if officers agree to an arrangement and the customer defaults, without having contacted the Council in advance, the remaining balance becomes due in full.

## **9. Recovery of Sundry Debts**



- 9.1 The Council recognises that prompt recovery action is key in managing its debt and maximising income.
- 9.2 In carrying out recovery action the Council will follow the principles outlined below.
- **Proportionality** – Proportionality allows for a balance to be struck between the potential loss of income to the Council and the costs of compliance.
  - **Consistency** – Consistency means taking a similar approach in similar circumstances to achieve similar ends.
  - **Transparency** – Transparency is important in maintaining public confidence. It means clearly explaining the reasons for taking any recovery/enforcement action. The Council will ensure that all recovery documentation is clear and informative so that debtors are fully aware of the procedures and consequences and options available.
  - **Vulnerable debtors** – Any action to recover debts will take account of the debtor's personal circumstances. We may not pursue recovery of debts where exceptional circumstances exist, and recovery of the debt would cause unreasonable hardship to the debtor. In determining genuine financial hardship, the Council will require an applicant to confirm the causes of the hardship or factors that have contributed to a downturn in business, these have to be beyond the control of the debtor, and they will have to provide documented evidence of such hardship or downturn including but not limited to the impact on the sales of Goods and Services and bank statements confirming the impact on cash available to settle the amount due.
- 9.3 All statutory methods of enforcement of debts shall be available for use. If there is a refusal to pay an invoice, the council will take legal action to collect the overdue debt. This applies if:
- There is no response to any requests for payment.
  - There is a commitment to pay, and it is not honoured.
  - An agreement to provide information or contact us by a specified future date is not complied with.
  - A failure to provide evidence of why you can't pay.
  - There is no adherence to any agreed payment arrangement.

**Enforcement action can include:**

- Referral to a Third-Party Debt Collection Agency
- Issue a claim and enforce this through the Small Claims Court
- Referral to internal Solicitors to issue a claim and enforce this through the County Court
- Referral to High Court for the debt to be enforced by a High Court Sheriff.
- Potential enforcement action to recover the debt may involve:
  - Warrant of Execution – Court Bailiffs ('enforcement agents')
  - Charging Order – a Legal Charge over your land or property

- Attachment of Earnings – deductions will be made directly from your wages.
- Third Party Debt Order – an amount owed to you by a third party will be frozen and paid directly to us.
- Order to Obtain Information – you will be ordered to attend Court and be examined in relation to the debt under Oath.

9.4 If enforcement action is taken, additional charges including Court costs, interest and compensation charges will be added to the overdue debt. these will be in line with the following:

- Section 69 County Courts Act 1984 (interest charged at 8%)
- Late Payment of Commercial Debt (Interest) Act 1998 (interest charged at 8% above the Bank of England Base Rate).

9.5 Except in the case of a demand payable by instalments, or, as otherwise contractually agreed, the generic recovery action (carried out by finance) for all demands is as follows:

- An invoice will be issued with a payment due date. Typically, this is within 30 days of issue.
- If no payment is received within 14 days of the due date of the invoice, a Stage 1 Letter will be issued giving a further 7 days' notice.
- If no payment is received within 7 days of the Stage 1 Letter, a Stage 2 Letter will be issued giving a further 7 days to pay. Note, if the amount is £10,000 or less offer the debtor court mediation before taking the claim formally to court. (see <https://www.gov.uk/make-court-claim-for-money/mediation>)
- If no payment is received within 7 days of the Stage 2 Letter, a Final Demand Letter will be issued.
- If no payment is received within 7 days of the Final Demand Letter, the debt will be referred to court by Finance for debts of less than £25,000 and passed to Legal Services to consider further action for sums totalling more than £25,000.
- Where legally permissible, the provision of future services to the debtor will be suspended until outstanding debts are settled.
- We will encourage people with payment problems to come forward early to discuss their individual circumstances.

| Stage                 | Action  | Days | Cumulative Days |
|-----------------------|---|------|-----------------|
| <b>Invoice issued</b> | With payment due date within 30 days  | 30   | 30              |
| <b>Stage 1</b>        | If no payment within 14 days of the payment due date, send Stage 1 Letter giving a further 7 days | 14   | 44              |
| <b>Stage 2</b>        | Stage 2 Letter giving a further 7 days  | 7    | 51              |
| <b>Stage 3</b>        | Final written letter, including wording to encourage debtors in                                   | 7    | 58              |

|                |  |                   |    |
|----------------|--|-------------------|----|
|                | difficulty to contact the council to discuss payment options. This includes notice that the debt will be referred for legal recovery action. Payment or payment arrangements to be in place within 7 days to avoid court action. See County Court procedures required on : <a href="https://www.gov.uk/make-court-claim-for-money">https://www.gov.uk/make-court-claim-for-money</a> |                   |    |
| <b>Stage 4</b> | For items less than £25K when debt is 90 days old. Court claim procedures can be instigated by Finance. Items over £25k refer to legal services for legal recovery.  | 32                | 90 |
| <b>Stage 5</b> | Failure to comply with legal decision by due date, refer to Council's Enforcement Agents   | As given by court |    |

9.6 Ownership of all sundry debts rests with the originating services who can issue an instruction to cancel an invoice if it is appropriate and justified to do so. It is the responsibility of the originating services to correspond with or discuss with the debtor, issues relating to the validity of the debt if the validity is being challenged by the debtor.

9.7 When dealing with all debt enforcement and collection cases, local authorities should ensure that accurate records are kept of:

- A debtor's details including their personal circumstances and anything that could impact on their ability to repay the debt.
- Any other agencies that could be involved, such as social services or mental health teams.
- The total debt including any additional costs incurred, for example, enforcement agent costs or court fees.
- Any discussions with the debtor concerning repayment.
- Any payment plans that have been agreed and the debtor's compliance (or lack of compliance) with any such plan.
- Any enforcement action taken.
- Any other relevant correspondence with the debtor including anything that they have sent, such as bank statements or income and expenditure forms.

9.8 Keeping full and comprehensive records of all aspects of a debt recovery case will also:

- Enable cases to be dealt with quickly.

- Ensure that the Council has a detailed picture of a debtor's circumstances and will be able to consider the best method of recovering a debt from them.
  - Assist a debtor making a formal complaint to the Council or the Local Government Ombudsman (LGO) about how their case has been dealt with, as the background to the complaint can be easily investigated.
- 9.9 Debts should be collected as due and not allowed to build up with no clear payment plan. Anything other than this will lead to more hardship and perhaps start a downward spiral on the ability of the debtor to manage all debts.
- 9.10 Once a debt has reached a final written warning stage consideration of legal enforcement is required.
- 9.11 The initial consideration will be to establish if there are multiple debts between services and to make sure there is liaison with the other services such as Housing and Revenue and Benefits, to determine the relative priority of the individual debts for both the individual concerned and the staff preparing settlement. In such cases, staff are expected to liaise and agree an appropriate means of coordinated recovery. Overall, our approach will be a proactive one to provide for multiple debt payments. In assessing the payment, we will have regard to:
- Circumstances of debtor
  - The size of the debt
  - Its relative priority
  - Consequences of failure to pay.
  - Increases in the debt.
- 9.12 Following this assessment, a joint decision by the services involved can then be made on taking legal actions via a court claim. If services cannot agree, the decision will be made by the S151 Officer.
- 9.13 For amounts less than £25,000 the Controls Accountant and Exchequer Team Leader can, after notifying the Section 151 Officer, make a court claim without referral to legal services. For amounts above £25,000 the decision should be referred to legal services for consideration. The Controls Accountant and Exchequer Team Leader may have to attend court if required as part of the process (see 9.16, below, for more details on court procedures)
- 9.14 For items that are passed to legal services to consider for further action, a judgment by legal officers will need to be documented as to if it is worth enforcing and if the debtor has any assets against which the judgment can be enforced. If it is decided that the costs of legal recovery are higher than the value of the debt, consideration of writing off the debt will be made and documented by the S151 Officer for approval for write off in accordance with the financial procedure rules.

- 9.15 Using a court incurs fees. The fees, as of March 2024, are set out below. If the outstanding amount is less than the court fees, then it is economically inefficient to use the court to settle the recovery of debt, and action should not be taken. The court fee is based on the amount, inclusive of interest, being claimed. (See 9.4)

| Claim amount           | Fees            |
|------------------------|-----------------|
| Up to £300             | £35             |
| £300.01 to £500        | £50             |
| £500.01 to £1,000      | £70             |
| £1,000.01 to £1,500    | £80             |
| £1,500.01 to £3,000    | £115            |
| £3,000.01 to £5,000    | £205            |
| £5,000.01 to £10,000   | £455            |
| £10,000.01 to £200,000 | 5% of the claim |
| More than £200,000     | £10,000         |

### What is a court claim

- 9.16 An application can be made to a county court to claim money owed to the council by a person or business. This is known as making a court claim. It was formerly known as taking someone to a 'small claims court'. Applications can be made online or by post. More detail can be found on the link below:

<https://www.gov.uk/make-court-claim-for-money/make-claim>

- 9.17 Claim the interest.** The Council can claim interest on the money owed. The interest will be calculated for you if you claim for an unspecified amount.
- 9.18 The amount of interest will need to be calculated when claiming for a fixed ('specified') amount of money.
- 9.19 Interest can be charged on late commercial payments for goods, or services. This is called 'statutory interest' - this is 8% plus the Bank of England base rate for business-to-business transactions. Statutory interest cannot be claimed if there's a different rate of interest in a contract.
- 9.20 For other types of debt, the rate is usually 8%. To calculate this, use the steps below.
- Work out the yearly interest: take the amount you're claiming and multiply it by 0.08 (which is 8%), then divide your yearly interest from by 365 (the number of days in a year) and multiply the daily interest from step 2 by the number of days the debt has been overdue.

- 9.21 A mediation service could be quicker and cheaper than going to court. Mediation is when an impartial person helps both sides work out an agreement.
- 9.22 Mediation organised by the court** - The court will offer mediation if the claim is for £10,000 or less and the defendant disputes it. This service is free. If both sides agree to mediation, a mediator from HM Courts and Tribunal Service (HMCTS) will be appointed.
- 9.23 The mediation appointment** - If both sides agree to mediation, a date and time will be advised for a telephone appointment.
- 9.24 The Small Claims Mediation Service can be contacted as below:
- Small claims mediation service  
scmreferrals@justice.gov.uk  
Telephone: 0300 123 4593  
Monday to Friday, 9am to 5pm

### **Use of Enforcement Agents (Bailiffs)**

- 9.25 Enforcement Agents are employed as a last resort and follow a strict code of conduct agreed with the council and in accordance with the National Standards for Enforcement Agents. After all attempts to gain payment have failed, a debtor's account may be passed to the bailiffs for collection. The bailiff is employed to obtain goods belonging to the debtor and sell them to pay off the debt.
- 9.26 Enforcement Agents will make arrangements for payment under guidelines provided by the council. Their charges are set in law.
- 9.27 Once an account is passed to the enforcement agents, all future payments must be made directly to them. Unless there are exceptional circumstances, no arrangements or payments will be accepted by the Council.
- 9.28 Enforcement Agents strict Code of Practice ensures that approval to remove must be sought from the Council prior to the removals of goods from the debtors' home.

### **10. Write-Off of Sundry Debts**

- 10.1 The Council recognise that where a debt is irrecoverable, prompt, and regular write-off of such debts is good practice.
- 10.2 The Council will seek to minimise the cost of write-offs by taking all reasonable action to recover what is due. All debts will be subject to the

full recovery, collection and legal procedures as outlined in this policy before write-off is considered.

- 10.3 Irrecoverable debts will be referred to the authorised signatory as per the constitution as needed, but within 30 days of the budget holder considering the debt to be irrecoverable. With sufficient information to be able to identify the amounts, customer and invoices the write off relates to and what time period it covered.
- 10.4 The limitations for writing off irrecoverable debts are those contained within the Council's Financial Procedure Rules.
- 10.5 Debts may be referred to authorised officers for write-off in the following circumstances:
- Debt remitted by a Magistrate.
  - The Council has evidence to confirm the claimant is suffering a severe physical or mental illness, which renders enforcement action inappropriate.
  - The Council is unable to trace the debtor.
  - The debt is not cost-effective to pursue due to small balance.
  - The debt is not cost-effective to pursue due to the likelihood of payment balanced against the cost of proceedings.
  - The claimant has died and there are no or insufficient funds in the estate to settle the debt.
  - The claimant is subject to formal insolvency proceedings and there is little likelihood of a dividend.
- 10.6 All accounts that are written off will be written off against the income code against which they are raised.

## **11. Policies Relating to the Monitoring of Sundry Debt**

- 11.1 On a monthly basis, a report showing all debts over 120 days is passed to all budget holders. It is the budget holders' responsibility to review this listing and to advise finance whether to write off the debt, any reasons not to pursue legal action against the debtor, make arrangements to get the debt cleared or cancel the debt (if inaccurate).
- 11.2 The Council has a performance indicator for debt over 90 days old as a % of aged debt. This is monitored quarterly as part of the Performance Management Framework. Where either national or local performance indicators exist, the Council will strive for top quartile performance and will publish actual performance against these targets as required.
- 11.3 A report showing performance against the set indicator and the profile of aged debt month on month is reported to the Finance, Audit and Performance Committee on a quarterly basis.

- 11.4 In accordance with CIPFA Code of Practice on Local Authority Accounting in United Kingdom, a bad debt provision is calculated annually and accounted for as part of the Statement of Accounts. This is based on the age of the debt and factors known by budget holders affecting its recoverability.

## **12. Policies relating to the Social Welfare of Debtors**

- 12.1 Equality and diversity considerations will be considered in accordance with the Council's Equalities Policy. Specifically, staff seeking to recover debts will have regard to:

- Ensuring information is accessible through translations, larger print versions or sign language, as appropriate to the needs of the debtor.
- The need for home visits where the debtors are unable to access advice services.

- 12.2 Budget holders will be able to intervene in the recovery cycle in appropriate circumstances to deal with hardship or dispute situations. This includes the ability to make deferred payment arrangements where immediate payment is impossible due to lack of means. Recovery procedures should not be so rigid as to cause unnecessary hardship or to prevent an individual approach and flexibility where appropriate.

- 12.3 The Council welcomes the involvement of welfare agencies were authorised by the debtor in connection with debts due to the Council and recognise the benefits that these organisations can offer both the debtor and the Council in prioritising repayments to creditors and in maximising income available to the debtor.

- 12.4 The Council supports the provision of advice from a number of agencies (including those below) and will work in conjunction with them for the benefit of the debtor.

- Age UK
- Citizens Advice Bureau (CAB)
- Shelter
- Clockwise Credit Union
- Jobcentre Plus
- National Debt Helpline
- Turn2us
- EDF Energy Trust
- British Gas Energy Trust (open to all customers)
- Energy Savings Trust
- Severn Trent Trust Fund
- Breathing Space

- 12.5 The Language Line facility is to be used as an aid to improve verbal communications with those customers for whom English is not their first



language. Language Line provides immediate access to a professional qualified telephone interpreter in 150 languages 24 hours a day 365 days per year.