



Reading Borough Council

Corporate Debt Policy

Date approved, By (Committee or partnership board)
on the Joint Recommendation of Alan Cross, Head of Finance & Zoe Hanim, Head
of Customer Services, who have agreed the policy with the Corporate Management
Team

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Executive Summary

As Reading Borough Council rises to the challenges of reduced grant funding, having to find further savings of some £40 Million over the 2014-17 period whilst delivering increased quality services to our residents, we need to adapt the way in which we approach debt collection.

This policy sets out our key priorities and principles for maximising collection, and provides details of the approach we will take in seeking to recover all money due to the Council. In all cases will be reasonable, fair and appropriate given the nature of the debt outstanding and the circumstances of the individual or businesses involved.

It also identifies our need to work consistently and cross directorate, in order to maximise efficiencies and deliver the best outcome for the authority.

In short this policy promotes the following key messages:

1. Introduce upfront payment for any new services that require payment, not rely on invoices - Payment before service (where appropriate and lawful)
2. Invoices, and other requests/demands for payment to be issued promptly and correctly first time
3. Invoices to be paid by our preferred payment method of direct debit when more than a one off bill (where monthly charge or instalments are appropriate) or standing order where direct debit facility not available.
4. All invoices to be paid within 30 days where appropriate, reminded within 14 days of non-payment, with further recovery action taken once a debt is 60 days or more.
5. Promotion of cheaper self-service payment methods such as internet, automated telephone payments, and direct debit. Moving away from Cash and Cheque.
6. Refer customers experiencing financial difficulty quickly to organisations who provide free and impartial debt and budgeting advice to ensure payment arrangements are appropriate, and that the customers themselves understand priority debts and what help and advice is available to them.
7. Work towards bringing together a corporate debt recovery team that is responsible for collecting all debt types to ensure consistency, fairness, transparency and efficiency.

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8. Publish and promote our corporate debt policy and steps we will take to recover debt, so our customers understand the consequence of non-payment.

9. Report regularly to the Corporate Management Team, in order that the authority is aware of the financial risk of non - collection for the authority.

The Policy

1. Introduction

This document details the Council's policies on the billing, collection and recovery of monies due to the Council.

The UK's recent poor economic climate and increasing pressure due to our central government grants being cut or reduced has accelerated our need for a robust Corporate Debt policy. It is important to have a policy that confirms our commitment to reducing our debt. As part of best practice, we must also have a policy that helps mitigate financial risks. This is especially important in light of the Government's Welfare Reform Policy and programme and whilst having to deliver our services to a high standard and within budget, we must recognise that there are vulnerable customers that not only need the services we provide, but help in accessing those services. This is why it is paramount that anyone collecting money on behalf of the council has the correct training and support to identify those customers who find themselves in genuine hardship. Therefore, a further aim of this policy is to ensure maximum take -up of Financial Help and Advice, whether that be financial assistance from the current National Welfare Benefits System or from the Council Discretionary funds or grants, or Debt Advice from our own internal debt advice service or signposted to our partners who provide such services.

Sums due to the Council can be a mixture of statutory and non-statutory charges, though the majority of the Council's income is associated with charges (and sometimes penalty charges) arising from a statutory regime. The methods for billing and recovery of the statutory debts are usually tightly prescribed. Our recovery practices must fully comply with these requirements.

This Policy sets out the general principles to be applied in relation to debt/income management across all services provided by the Council where appropriate.

The management of income is key to ensuring there is sufficient money available for the Council's service delivery. The Council collects income from many streams; some of this activity is governed by legislation as stated above whilst others follow best practise within service areas. The key to economic, efficient and effective income management is the creation and maintenance of a clear framework that sets out the Council's approach to managing debt which all part of the Council must adhere to.

It is essential that all monies due are collected effectively by the Council, and that debt owed to the Council beyond its normal payment period is kept to a minimum. This is because the Council has both a legal duty and a responsibility to its citizens to ensure that income due is paid promptly.

The approximate value of Reading Borough Council's income is £300 million each year, as well as tax and business rate income over £150 million. Whilst some of this income is received by way of grant, a significant proportion comes from charges to individuals for services that in some cases take account of ability to pay. Overall at the financial year end we typically have £20 - £40 million outstanding debt, and whilst this varies over time, this policy is intended to explain how we manage that income and ensure that all customers are treated fairly, but when necessary firm action is taken to ensure the Council receives its income. It is therefore of very significant priority to ensure that the existing debt is reduced, future debt is minimised and in some circumstances, prevented altogether.

During 2013/14 a cross directorate project team has been working together looking at how the Council currently collects its debts; this team has mapped the processes and discussed common approaches. While satisfied that the Council follows statutory processes and good practice, the group felt that there was further work that could be undertaken to take payment up front for more services, improve our payment/website facilities - including more take up of direct debit as opposed to standing orders, encourage self-serve, minimise the need to raise invoices in the first place, this would all contribute to efficiency and budget savings and is in line with our commitment set out in our Digital Strategy to develop and integrate e-forms & payment facilities into the website, and into back office systems.

Some work has already started in this area and this group intends to carry on working with service areas, making recommendations as the Digital Strategy is implemented.

2. Aims

The Council want to help people and businesses with their finances, especially those experiencing financial difficulties or on low incomes. At the same time the Council has a duty to ensure that people and businesses pay their bills as quickly as possible.

The Council will balance these two aims by taking the following action:

- Following this policy in helping to resolve problems
- Acting as early as possible to help those who are struggling to pay
- Attempting to assist the customer in sorting out debt problems before they escalate out of control. Identifying potential problems when possible and providing timely money advice referral where early contact has identified financial difficulty e.g. Citizens Advice Bureau etc.
- Acknowledge customers that have multiple debts owed to the Council and discussing with relevant Departments to find the best way forward, if required
- Facilitate a co-ordinated approach to managing multiple debts owed to the Council.
- Protecting customers and their families from harassment and undue hardship

- Allowing for the proper holistic appraisal and consideration of a customer's circumstances and provide arrangements for those who genuinely need time to pay their debts
- Asking customers to provide reasonable information regarding their finances, if required, in order to facilitate agreeing an affordable arrangement
- Periodically reviewing instalment arrangements to ensure that a debt is being cleared as quickly as possible
- Informing customers that once an agreement has been made no further action will be taken unless the arrangement is broken or a review of the arrangement is made
- Acknowledging the customer's obligations and responsibilities to his or her dependants.
- Recognising and protecting the customer's rights at every stage of the process.
- Complying with the relevant customer care standards.
- Using plain English in letters and all other correspondence.
- Providing translation services where required.
- Treating individuals equally, consistently and fairly, regardless of age, gender, disability, and sexual orientation and to ensure that individual's rights under Data Protection and Human Rights legislation are protected.
- Encourage payment up-front where possible to avoid services needing to issue invoices.
- Apply best practice to debt collection in all service areas.

3. Scope of the Policy

This policy applies to the collection of:

- Council Tax
- Non-Domestic Rates (Business Rates / NNDR)
- Housing Rent, service charges and rechargeable repairs
- Housing Benefit and Council Tax Benefit/Support Overpayments
- All other Sundry Debt (Council Services which include non-residential /residential care charges, contractual debts, also including commercial debts, debts payable to schools for nursery fees etc. which are paid to the individual schools via their own invoice system, valuation, trade waste, licensing etc...)
- Overpaid salaries and wages

There are specific rules and regulations which govern the recovery and collection of these debts, and are set out in the respective appendices.

4. Policies common to all types of debt

Every demand for money should be correctly addressed to the person who is liable to pay it. The name on the demand should be that of a person or body possessing "legal personality".

Demands will, wherever possible, be issued as soon as practicable and, if possible, on the day of their production.

The Council will attempt at all times to use the most appropriate and effective method of debt recovery in order to maximise income.

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.

Equality and diversity considerations will be taken into account in accordance with the Council's Equal Opportunities, and other relevant policies. 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.

All notices issued by the Council will be identifiable as being from the Council by use of the corporate logo and full contact details.

Where either national or local performance indicators exist the Council will strive for top quartile (in comparison to similar councils) performance and will publish its actual performance against these targets annually. Progress reports will be made available at regular intervals during the year to the Corporate Management Team and (normally) Policy Committee.

The Council will continue to work in partnership with welfare/advice agencies where authorised by the debtor in connection with debts due to the Council, and recognises 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.

The Council supports the provision of advice from external agencies and will work in conjunction with them. These include Age Concern, Citizens Advice Bureau (CAB) and Welfare Rights.

In cases of multiple debts there must be close liaison between services. Multiple debts are where a debtor has significant debts in more than one service area, e.g. NNDR, council tax and housing benefit overpayment. Such cases can present problems in determining the relative priority of the individual debts for both the individual concerned and some officers pursuing settlement.

In such cases Officers are expected to liaise and agree an appropriate means of co-ordinated recovery, which reflects these policy aspirations together with the need to balance repayment profiles across all debts due to the Council. It has been recognised by the working party that we do need to establish a hierarchy of debt therefore those debts that result in the loss of accommodation or imprisonment be given greater priority first. Please see below for hierarchy of debt. Whilst recognising this need, it should also be noted that lower priority debts are not automatically written off; the debtor will need to understand that these will require payment also.

We are committed to cross council and service communication, where appropriate cases present themselves in these circumstances we will work closely with other departments to ensure the appropriate action is taken.

The Council recognises that prompt recovery action is key in managing its debt and maximising income. The Council therefore aims to:

- Regularly monitor the level and age of debt.
- Set clear targets for the recovery of debt.
- Have clear written recovery procedures.
- Set priorities for specific areas of debt and continue to review the recovery methods used to ensure maximum recovery.
- Regularly review irrecoverable debts for write-off.

Sundry debt accounts that are written off as a charge against the income code against which they were raised. Separately the Council makes a bad and doubtful debt provision, and reviews it at each financial year-end.

Where an external agency is procured to assist with the delivery of a service the flow of information between the Council and the agency must be in a secure electronic format (in accordance with the Council's policies for data security).

Where legislation permits, the Council will seek to levy and recover from the debtor any and all costs/fees that are legitimately due from the debtor to the Council or its agents. Only in exceptional cases, where it would not be in the public interest to pursue costs/fees, will they be waived.

5. Principles of Recovery

The Council will follow the principles outlined below.

- Our action will be **proportionate**
- Our approach will be **consistent**
- Our actions will be **transparent**

Additionally our intention will be to be firm, fair and effective whilst adhering to our customer service standards.

Proportionality - Proportionality allows for a balance to be struck between the potential loss of income to the Council and the costs of collection.

Consistency - Consistency means taking a similar approach in similar circumstances with different debtors to achieve similar ends and be fair to all. The Council's aim to achieve consistency in:

- The advice the Council gives.
- The use of its powers.
- The recovery procedures used.

However, the Council recognises that consistency may not mean simple uniformity. Officers need to take account of many variables such as:

- The social circumstances of the debtor.
- The debtor's payment history.
- The debtor's ability to pay.

Transparency - Transparency is important in maintaining public confidence. It means helping people to understand what is expected of them and what they should expect from the Council. It also means explaining clearly the reasons for taking any recovery action.

Transparency is a key part of the Council Officer's role. If action is required, the reasons why must be clearly explained and time scales must be clearly stated. A distinction must be made between advice and legal requirements.

Communications should be in plain English, and large print with Braille or translated versions will be made available to customers upon request.

With the exception of Council Tax and NNDR and any charge that is made by way of a "fine" for non-compliance with the law, an opportunity must be given to discuss what is required to comply with the law before formal recovery action is taken. In the case of council tax, NNDR, and other statutory charges where the customer seeks clarification of their legal obligations, the Council will provide this. A written explanation must be given of any rights of appeal against formal recovery action either before, or at the time the action is taken.

6. Hierarchy of Debt

Some customers will owe more than one debt to the Council, and may be on a low income or experiencing financial hardship. In such cases, it needs to be as clear as possible, which debts the Council considers a priority.

Priority will normally be given to debts where non-payment could lead to loss of the customer's home or imprisonment. These relate to Rent/Service charges and Council Tax, which are most commonly enforced through the courts as per statutory requirements. Account will also be taken of the stage we have reached in the recovery process.

Other debts owed to the Council may, depending on the circumstances, will normally be considered to be of a lower priority. However, this should not provide a debtor with a reason to believe that they are not liable to pay these debts. In some instances the Council must follow statutory procedures for these debts as well.

When agreement on appropriate action and priority cannot be reached between service managers the individual case will be referred to the Council's section 151 officer who will decide.

7. Methods of Payment

The Council's preferred method of payment is payment up front, if applicable, or at request of service. Failing that Direct Debit is preferred, and we will continue to encourage this approach, and improve systems so it is available for an increasing range of debts whilst implementing our Digital Strategy. However, this does not prohibit continuing to accept payment by other methods.

In order to promote the most cost effective and less manually driven processes, we will review arrangements, and may withdraw some options that are less cost effective. Apart from Direct Debit, the Council accepts a range of payment types including cash, cheque, credit and debit cards, paypoint payment cards, post office payments, standing orders and other electronic banking methods, such as online internet banking and touch tone telephone payments.

Each debt will have its preferred method of payment and these will be clearly communicated to the debtor which methods of payments are acceptable.

8. Write Offs

The Council recognises that each year a small number of debts become irrecoverable, and in such circumstances prompt and regular write off of such debts is good practice. This will allow for a correct calculation of bad debt provision each year, and avoid wasting resource chasing debt where there is no realistic prospect of recovering.

The Council will seek to minimise the cost of write-offs to the local Council Tax payers by taking all necessary action to recover what is due. All debts will be subject to the full collection, recovery and legal procedures as outlined in this policy.

Write off is only appropriate where:-

- The demand or invoice has been raised correctly and is due and owing; and
- There is a justified reason why the debt should not be pursued further.

Justified reasons - It is not possible to list every scenario which could make a debt suitable for write off. However, the following factors could be appropriate depending on the circumstances. The advice of the Corporate Debt Team should be sought in determining whether a debt is suitable for write off. Some of the justified reasons are included below:

- The customer is bankrupt or in liquidation and the Official Receiver or Liquidator has confirmed there is no dividend payable; these matters should be referred to the Corporate Debt Team as soon as a notification of bankruptcy or liquidation is received;
- The customer cannot be traced. The Corporate Debt Team should be consulted before applying for write off, as they have search engines and other methods to locate absconded customers;

- The debt is uneconomical to pursue, or to pursue further. This may be based on more than one factor, such as the amount of the debt, the financial position of the customer and the cost in administrative and Officer time in pursuing the debt. If the debt is over £10 the Service should consult the Corporate Debt Team to determine whether the debt is economically viable to pursue; and permission to write off will be sought from the Head of Finance or Service Head.
- Administrative errors or loss of documentation. When a debt is referred to the Corporate Debt Team, under the Civil Procedure Rules, the Council is required to set out in detail the basis of the claim and enclose documentary evidence to back up the claim. If there is a lack of evidence it may not be possible to pursue the matter. The Service may wish to consult Legal Services on the position before referring the debt for write off;
- The debt is a contractual debt over 6 years old. Under the Limitation Act 1980, it is not possible to issue court proceedings in a contractual matter which is over 6 years old; however there are exemptions to this rule and the Services should consult Legal Services where they believe the debt is no longer enforceable by virtue of the Limitation Act 1980.
- The Magistrates Court has refused a committal application and remitted the debt.
- The Council has evidence to confirm the claimant is suffering a severe physical or mental illness, which renders recovery action inappropriate.
- The customer has died and there are no or insufficient funds in the estate to settle the debt

Please note Services will be required to confirm they have followed the normal debt recovery procedures before referring the debt for write off, and where the procedures have not been followed an explanation will need to be provided.

Where debts have been referred to the Corporate Debt Team and it becomes impossible to recover the balance, the Corporate Debt Team will provide a memorandum to the instructing Service explaining the reasons why it is considered appropriate to write off the balance. The Corporate Debt Team can only recommend or agree to write off. It is the responsibility of the Head of Service to ensure completion of the write off form and submit the request to the Corporate Debt Team in accordance with the procedures identified in this guidance note. All relevant correspondence relating to the debt must accompany the write off form.

Irrecoverable debts will be referred to the relevant Officer(s) or Committee, designated under the Council's Finance and Contract Rules at a pre-agreed frequency and in a pre-agreed format. At officer level this is the Head of Finance.

The limitations for writing off irrecoverable debts are those contained within the Council's Finance and Contract Rules.

The appropriate policy on the write off of a debt is detailed in the appendices attached.

9. Helping Customers

9.1 Customer Care

We can make it easier for Customers to pay by making sure they know when paying a bill:

- How they can pay
- Where they can pay
- To quote the correct references so that their account is credited quickly and correctly.

Financial Difficulty

Where a customer believes they cannot afford to pay as billed they should contact us in the first instance as it may be appropriate depending on individual circumstances to enter into an agreement or carry out a financial assessment of their incomings and outgoings. This may mean at times advising customers that they will need to rethink their spending habits and prioritise what they pay to whom differently.

The customer should contact the Council as soon as possible - as the Council may continue to take action to collect a debt if there is no response.

The Council will require the outstanding amount to be cleared as quickly as the customer's finances will allow. Debt recovery staff are always available to discuss Customers' requirements and provide instalment applications and advice.

It is not always possible to place cases on hold due to statutory procedures for enforcement of the debts. Each case will be considered on its own merits.

9.2 How to get help and advice

The Council will offer early and professional advice to all of its customers - and customers can help us to help them by contacting us if there is a problem.

We will signpost customers facing financial difficulty to our partners, including CAB, Welfare rights. For those residents experiencing difficulties paying their rent/service charges a referral will be made to our in house Debt advice Team.

We will where appropriate make customers aware of the financial crisis support team and discretionary housing/council tax support schemes to encourage maximisation of take up.

We also need to be mindful when dealing with customers those that may fall in to the following categories and therefore could be considered vulnerable:

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The Elderly

People with a disability

The seriously ill (*this could include depression, bipolar & mental health issues*)

The recently bereaved

Single parent families

Pregnant women

Unemployed people

Those who have obvious difficulty in understanding/speaking/ reading English

- We need to guard against abuse of vulnerable status.
- We need to be aware that individuals may not admit to being vulnerable so we will need to try and establish if they are by using leading questions.
- We should continue to refer potentially vulnerable debtors to Advice UK, National Debt Line, The Money Advice Service or CAB & allow a period of time for them to take advice
- If we are unable to establish someone is vulnerable, but we believe they are during a visit or on the phone, we should send a letter referring them to the relevant advice agencies and allow them a period of time to do this.
- We need to take care, make an informed decision as to whether they have capacity to deal with the issue but in most instances recovery can continue where appropriate.

Business Customers

Where we are aware of a business struggling to meet their debt liability to the local authority, we will where appropriate sign post to them to available help. For example in the case of Business Rates we will ensure that they have applied for any small business rates relief or other reliefs as appropriate.

For other types of debt we will work closely with the business to ascertain the reason for non or late payment and make appropriate arrangements to collect the debt. This may mean extending the time to pay or offering a further arrangement.

However where a business does not pay, and there is not a valid reason for non-payment, we will continue to enforce the recovery tools available, such as use of court action, bailiff and winding up orders.

In some instances this may include the withdrawal of service for example waste management we would withdraw service if invoices remained outstanding.

However before any action is taken, there would be contact with the customer to understand why they have not been able to pay and an appropriate assessment of their circumstances taken in to account before any further action is carried out.

Visiting Customers

The Council or contracted External Debt Recovery and Enforcement Agents may undertake visits to persons / businesses in arrears in order to resolve accounts outstanding.

All staff or third parties making such visits will act in accordance with an agreed code of conduct.

The Council will make every effort where possible to co-ordinate visits to debtors so that where appropriate and practical, different debts owed by the same individual / business can be addressed at the same time.

If someone needs further assistance

Some people despite what we can offer as a Local Authority may still need further help and may require the assistance of one of the following:

The Citizens Advice Bureau - for personal debt and housing advice
Tel 0844 826 9713
www.citizensadvice.org.uk

Reading Community Welfare Rights Unit- for personal debt and welfare benefit advice and assistance
0118 9551070
www.readingcommunitywelfareunit.co.uk

Money Advice Service- for personal debt and financial advice
www.moneyadviceservice.org.uk

The National Debt Line
0121 410 6230
www.nationaldebtline.co.uk

Age Concern for independent advice on benefits / financial concerns
Wigan 01942 241972. Leigh 01942 607337
www.ageconcern.org.uk

Consumer Credit Counselling Service
0800 138 1111
www.direct.gov.uk

Free, confidential help and advice for Businesses can be found at:
Business Debt Line
0800 197 6026
www.bdl.org.uk

There are many other advice call centres and websites available on-line, though many sites are profit-making and will charge for their services - customers are advised to use care and check for fees and charges when selecting any of these services.

9.3 Paying by instalments

When a Customer find themselves in difficulty with debts, it may be possible that all their debts including all Council debts will be taken into account when assessing ability to pay. All cases will have individual treatment according to the circumstances surrounding their debt. For non-priority debts an assessment of the ability to pay will be based on the proportion of disposable income that the customer states that he/she has and realistic arrangements by regular payment amounts will be agreed in preference to taking legal action.

The intention is that the debts should be cleared as soon as possible. It may not always be appropriate to offer payment by instalments. For instance some accounts may not be paid by instalments e.g. where a customer has requested goods or services from the Council - they would be expected to be able to pay if they've made the order, or if they have incurred parking or bus lane penalties. The Council will consider what course of action is appropriate as follows:

- Payment at once, in full as per the invoice, agreement etc.
- Payments within 3 months - agreed without completing a pro-forma of details of income and expenditure, but written agreement from the customer is required.
- Payment within 12 months - would require income and expenditure details to be supplied.
- Payment over a longer period if the customer does not have the funds to clear the debt as above - would require income and expenditure details to be supplied and may be subject to periodic review.

To determine the level of instalments, departments will use a standardised Income and Expenditure pro-forma which takes account of the standards and guidelines available nationally e.g. the details as required by the County Court and documents supporting the financial statement may be required in order for an arrangement to be made.

Once an arrangement is made Customers are expected to comply with that arrangement. Where a customer's circumstances change and that becomes difficult again, contact should be made to discuss further options. Failure to comply with the arrangement will result in further recovery action.

The payment of a judgment or order by instalments through the County Court/Magistrates. Where instalment orders have been made based on the debtor's means at the time the order is made, these can only be amended by a further order pursuant to an application from one of the parties. This may impact on instalment agreements for multiple debts.

9.4 What Service Will Customers With Multiple Debts Receive?

Customers presenting with multiple debts need to believe that there is a solution to their debt problems and should be actively encouraged to share with staff, information on all monies owed, in order for the most appropriate referral to be made.

The Policy does not promote a “one size fits all” approach, but rather looks to work with the customer to take agreed steps to help address multiple debts.

To this end, the response to debt management will vary as different solutions will be needed to address the far ranging complexity of cases etc.

Alongside the debt owed to the Council, the Policy will enable customers to receive help, advice and support in reaching realistic payments to other creditors including HMCS (in respect of fines), utilities, credit companies and mobile phone suppliers.

The provision of individual responses will also take into account diversity and exclusion issues.

Support will be offered including access to interpreters for customers whose first language is not English or for those who are deaf, ensuring staff attending appointments are able to address the individual customer’s needs. Where requested the provision of supporting information for customers will be made available in an appropriate format, e.g. large print, Braille or audio.

9.5 Irrecoverable debts

The Council recognises that not all debts are collectable and therefore it will be appropriate in certain circumstances to classify debts (or sometimes parts of debts) as irrecoverable, where pre-determined criteria are met.

The Council will ensure that there are guidelines / policies in place which detail the action to be taken prior to an account being written-off as stated earlier.

In relation to the above, it is also recognised that accounts below a certain value will be uneconomic to collect. These will be assessed by the individual debt officer will take advice from their line manager or service head.

9.6 Credits

Reading Borough Council will develop a corporate approach to refunding credits, in that where ever possible; checks will be made for other outstanding debts to the customer, prior to a refund being made.

Where other debts are identified, it may be necessary to obtain the customer’s permission to transfer the credit to another outstanding debt, though normally every reasonable effort must be made not to refund the credit whilst other debt is outstanding.

9.7 Complaints

Most complaints can be sorted out by discussing the problem. If we agree a solution we will keep a record to make sure nothing was missed.

If we cannot solve the problem immediately it will be passed on for further investigation and action. We use a two stage complaints process to do this

Stage One

- Within 5 working days we will write and tell you who is investigating your complaint.
- The letter will also explain how long this will take.
- We aim to answer your complaint within 20 working days.
- The investigating officer will write to you with the results of the investigation.
- This letter will explain what to do if you are not happy with the investigation
- If you want to take your complaint to stage two you need to write to us within 14 days

Stage Two

- Within 5 working days we will write and tell you who is doing the stage two investigations.
- The investigating officer will be a more senior officer.
- The officer will contact you and make a written record of your complaint.
- Within 30 working days their service manager will write and tell you the result of the investigation.
- You will also get a copy of the officer's report.

We aim to sort out any complaint as quickly as possible and hopefully you won't want to go to stage two. However, if you are still dissatisfied after stage two you have the right to contact the Local Government Ombudsman.

9.8 Rights of Appeal

There are a number of ways in which people can appeal about decisions the Council may have taken:

- Valuation Tribunal: For people who believe the Council has acted incorrectly on a Council Tax billing matter.
- Magistrates Court: For people who are aggrieved by the recovery process for Council Tax and Non-Domestic Rates and for Non-Domestic Rates payers who believe the Council acted incorrectly on a billing matter.
- Appeal Tribunal: For decisions made on Housing Benefit claims
- County Court: For those defending possession action of Council property, action taken to recover Housing Benefit overpayments and for Sundry Debt Invoices.
- Traffic Penalty Tribunal: for appeals against Parking and Bus Lane Penalty Charge Notices (PCNs)

10. Implementing the Policy

The Council will take steps to:

- Give early advice to the customer on instalments and where to get assistance with debt problems

- Make all advice on how and where to pay clear and simple.
- Raise awareness of a debt as quickly as possible and take action when it says it will if the amount remains unpaid.
- Raise the implications for non-payment - review all reminders and letters periodically, change type face, font, printing and paper colours, if required to heighten the impact.
- Review each case individually, taking into account the known circumstances of that customer, if possible and endeavouring to find a remedy before taking any proceedings.
- If an account remains unpaid then advise the customer what will happen and let the customer know which organisations or agencies can advise them and how they can be contacted.