

INCOME & CREDIT MANAGEMENT POLICY



1. Purpose and Introduction

1.1 The purpose of Credit Management for the Council is:

“To maximise the amount of collectable debt, through the prudent extension of credit, the balancing of financial risk and the efficient collection of income, within a framework of customer care and client sensitivity.”

- 1.2 The S151 Officer has responsibility, under Section 151 of the Local Government Act 1972, for the administration of the financial affairs of the Council, including the management of credit and the collection of debt. Financial regulations covering this area are to be found in Appendix D, Section 2 of those regulations.
- 1.3 This policy sets out to define the credit management function, stating the objectives and responsibilities, in order that the principles of operation of credit management are clearly recognised and understood.
- 1.4 Income is vital to the Council; the income generated by the Council in the form of Council Tax, Business Rates, rents, fees and charges constitutes a large proportion of the Council’s overall resources. The Council relies on this income to fund the services it provides and any failure to collect income represents a risk to the sustainability of Council services.

2. Definitions

- 2.1 **Credit Management** is defined as the management of the risks and costs associated with allowing customers time to pay. The use of the word credit in the context of this policy relates to the provision of goods or services for payment at a later date.
- 2.2 **Prudent extension of credit** means supplying goods and services with payment due on receipt of invoice (i.e. a credit period is not offered). Payment periods (i.e. credit) may be offered where necessary to ensure that services remain accessible however these will vary from service to service. It should be noted that where possible, payment for standard goods and services should be received in advance of service.
- 2.3 **Balancing of financial risk** means evaluating the financial risk of providing goods and services in advance of payment and the likely prospect of recovering sums due.
- 2.4 **Efficient collection of income** means encouraging people to pay on time by offering a wide variety of payment methods, including direct debit, e-payment, and using cost effective collection methods, such as

automated reminder letters, telephone calls and personal visits. It also means making decisions on the advancing of credit and the collection of debt in an equitable manner. A manner which does not discriminate on any grounds for example by age, gender, disability or ethnicity.

- 2.5 **Customer care and client sensitivity** means handling all customer enquiries with courtesy and sensitivity and meeting the needs and expectations of different client groups, including offering flexible payment options and a wide variety of payment methods, where appropriate.


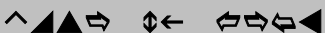
3. Scope

This policy applies to all sources of income across the Council and also applies to the provision of both statutory and non-statutory services.

- Essential and Non-essential Services (General Income)
- Non-Domestic Rates
- Council Tax
- Parking

4. Corporate Financial Systems

- 4.1 The following corporate systems are the primary systems for the collection of income due to the Council:

	
Civica Authority Financials	Sundry debt
Tricostar	Legal debt recovery, case management
Capita Academy	Council Tax National Non-Domestic Rates (NNDR) Housing Benefit
Parking Gateway	Parking Fines

5. Objectives

- 5.1 To administer an efficient debt collection process with clearly defined roles and responsibilities and documented processes.
- 5.2 To maximise the amount of income collected using the most efficient methods of payment.
- 5.3 To ensure that the cost of providing goods or services on credit terms and the cost of recovery is kept to a minimum.
- 5.4 To minimise cost to the Authority by applying administration charges for extended credit arrangements and failed payments, where cost has been incurred.
- 5.5 To minimise cost to the Authority by applying interest and charges as appropriate in accordance with relevant contracts, legislation or Late Payment of Commercial Debt (Interest) Act, 1998
- 5.6 To minimise cost by receiving payment up front for services wherever possible.
- 5.7 To minimise bad debt and provide adequate levels of provision for bad debt occurring.
- 5.8 To identify high risk customers, especially those likely to get into financial difficulties. Departments should make appropriate checks, to ensure affordability and safeguard the recovery of outstanding debt.
- 5.9 To maintain high quality and comprehensive accounts receivable information to provide easily accessible, robust management information as well as accurate customer accounts history.
- 5.10 To operate within an overall framework where core working practices are consistently applied across all services and best practice adhered to.
- 5.11 To adhere strictly to legislation, codes of conduct and professional guidelines, taking into account the Council's policies on equalities and considering diversity issues.

6. Responsibilities

S151 Officer

- 6.1 The S151 Officer has a statutory responsibility for the efficient administration of the Council's financial affairs and to protect the Council's financial position. Consequently, responsibility for the implementation of this policy rests with the S151 Officer. All Officers must comply with this policy and the S151 Officer must be consulted, and give approval, for any deviations to this policy.
- 6.2 The S151 Officer will monitor the overall debt position of the Council and keep under review the arrangements for the effective and efficient collection of debt.
- 6.3 The S151 Officer will report formally as part of the annual outturn report. Exceptions will be reported as required.
- 6.4 Income targets are set as part of the Finance Department Key Performance Indicators (KPI) scorecard and reviewed at Finance Management Team meetings (FMT).

6.5 Chief Officers

- 6.6 Chief Officers will be responsible for ensuring these arrangements are communicated, understood and applied by the staff involved in the income and credit management process.

Head of Revenues, Benefits and Service Centre

- 6.7 The Head of Revenues, Benefits and Service Centre is responsible for making all recommendations over changes to core working practices and procedures and implementing these changes as they relate to this policy, including any associated assessment of risk.

Departmental (for ease of reference the “Department” refers to the originating department that created the debt / invoice).

- 6.8 To ensure affordability the Department will undertake relevant credit checks prior to entering into contract with customers.
- 6.9 Credit arrangements outside of standard payment terms should not be offered to new customers.
- 6.10 The Department will ensure relevant legal documentation (leases and contracts) are signed by Officer and customer and retained.

- 6.11 Departments should consider including a contract clause which allows for the offsetting of payments against outstanding invoices when entering into a contract with customers.
- 6.12 It is the Department's responsibility to provide relevant information enabling accurate customer accounts and invoices to be raised at the appropriate time.
- 6.13 Departments should inform the Revenues, Benefits and Service Centre (RB&SC) of changes to contact and billing details as soon as they occur. RB&SC will undertake all amendments in accordance with the procedures for the maintenance of customer account data on the relevant systems.
- 6.14 It is the Department's responsibility to resolve disputes promptly. All communications relating to the dispute should be provided to the RB&SC.

7. Policy Alignment

- 7.1 The Income and Credit Management Policy is designed to be consistent with the following strategies and policies of the Council:
- Medium Term Financial Strategy
 - Sustainable Community Strategy
 - Financial Regulations.
 - Charging Policy (in respect of Adult Social Care)
 - Deferred Payment Agreement
 - Bad Debt Procedure

Medium Term Financial Strategy

- 7.2 The Medium-Term Financial Plan (MTFP) is aimed at providing the financial capacity to deliver the Council's priorities on a sustainable, medium term basis. It recognises the cost pressures faced by the Council over the medium term and matches this against the resources that the Council is likely to achieve. A key strand of the MTFP is driving efficiency and value for money. Minimising the amount of non-collectable debt helps to achieve the aim of protecting and increasing income.

Sustainable Community Strategy

- 7.3 The Sustainable Community Strategy promotes "Access for all Plymouth's residents to the city's cultural, economic and social life". By maximising the amount of income collected, services enjoyed by those that would otherwise be financially excluded can be maintained. The Income and Credit Management Policy allows for waivers to be granted in exceptional circumstances, taking full account of the diversity of each individual's circumstances.

- 7.4 This policy is consistent with these strategies and aims to recover only that which is due under other approved policies of the Council.

Financial Regulations

- 7.5 The Financial Regulations provide the framework for managing the Council's financial affairs, ensuring that best practice and legal responsibilities are always adhered to.
- 7.6 They apply to every member, committee, school governing body, maintained school, department, Officer, partner, employee of the Council, and anyone acting on behalf of the Council, unless otherwise minuted by the Council. Breaches will be reported to the Audit & Governance Committee, if the Responsible Finance Officer and the chair of the Audit & Governance Committee deem that it is appropriate.

Charging Policy

- 7.7 Section 17 of the Health and Social Services and Social Security Adjudications Act 1983 (HASSASSA Act 1983) gives local authorities a discretionary power to charge adult recipients of non-residential and some respite services such amounts as they consider reasonable.
- 7.9 Like most local authorities, Plymouth City Council is reliant on the income raised from charging for such services to fund a proportion of the costs. Without this income, service levels would be significantly reduced. Central Government assumes that councils will partly fund services from client charges when allocating funding each year. Plymouth City Council has developed a Charging Policy on the basis of equity, need and a duty to provide care.
- 7.10 The policy meets the statutory provisions stipulated in:
- Sections 14, 17 and 69-70 of the Care Act 2014
 - the Care and Support (Charging and Assessment of Resources) Regulations 2014
 - the Care and Support and Aftercare (Choice of Accommodation) Regulations 2014
 - and the guidelines as set out in "Social care charging for local authorities: 2017 to 2018"

8. Principles of Operation – Essential and Non-Essential Services

- 8.1 The Policy Principles set out below represent the standards and procedures that shall apply to all income collections systems throughout the Council. Any deviation from these principles will require the explicit

approval of the S151 Officer. Dispensations are only likely to be given in circumstances where they further the greater economic interests of the Council, avoid undesirable social or economic consequences or where the processes in this policy are incompatible with the currently employed technology.

8.2 It should be recognised that income derived from the supply of goods and/or services is reduced by the following:

- The cost of allowing credit terms by way of lost interest or interest costs incurred during the credit period
- The cost of collecting outstanding debts
- Accounting provisions against non-collection of outstanding debts

8.3 It should also be recognised that allowing credit presents the risk of losses due to bad debt, which results in total loss of income in addition to the incurred costs of collection.

Payment Terms

8.4 All opportunities to take payment in advance will be taken.

8.5 Where payment in advance is not possible, standard terms will be for payment to be made on receipt of invoice. Any deviation from the standard terms must be made with prior agreement from the RB&SC.

8.6 Discounts will not be offered unless previously agreed by S151 Officer.

8.7 Failure to pay on time, or poor payment history, may result in the withdrawal of non-statutory services. Interest may also be applied, either under contracted terms or the Late Payment of Commercial Debt (interest) Act 1998.

Raising of Invoices

8.8 Responsibility for the accuracy of invoicing remains with the originating department.

8.9 All invoices will be generated promptly and as close to the point of provision as possible, and in any event within five working days of that provision.

8.10 Invoices should only be raised when payment is due. The initial recovery process is automated and manual intervention should not be expected to

interfere with this process. For example, an invoice should not be raised then recovery immediately put on hold as the invoice should only be raised when payment is expected and due. This may mean negotiations should be had with debtors in advance to ensure no avoidable disputes will be raised.

- 8.11 All invoices should be raised with the correct income detail code(s) for the goods or services supplied
- 8.12 It is essential for recovery purposes that the correct and accurate name and title of the customer are shown on the invoice. If the customer is a business the following information should be obtained:
- Full trading title
 - Whether it is a partnership/sole owner/limited company/PLC
 - The registered office
 - Directors' or partners' names
 - Company Registration number
 - VAT number
 - VAT rate
 - Full address, main telephone number(s) and email address.
 - Date of invoice
 - Name and telephone number of Customer Payment Manager/Team
- 8.13 Invoices must only be raised to the person or organisation ultimately responsible for paying the account. Litigation is likely to be unsuccessful if the debtor details are not accurate, which will result in departments losing their income.
- 8.14 A clear description of the goods or services provided must be contained in every invoice to ensure prompt payment. Specific details must be given to assist the customer and reduce any ambiguity (for example 'see attached' is not acceptable);
- Correct customer details
 - No abbreviations
 - Clarity of content
 - Quantity of charge
 - Date/Time of service / provision
 - Purchase order number
 - VAT if applicable
- 8.15 Invoices must not be manually amended following print.
- 8.16 Internal billing should be used for all inter-departmental debt by journal transfer in the General Ledger. Please speak to your Service Accountant for further advice.

- 8.17 In general, the principle to be applied is not to raise invoices for less than the value of £30.00. Charges below this amount should be collected in advance or aggregated billing raised.

Payment Methods

- 8.18 Various methods of payment shall be available to all customers for the benefit of both the Council and the customer. These will include BACS, standing order, direct debit, debit and credit card payment, PayPoint Terminals, Post Office Branches, by telephone and also via the internet. The preferred method of payment for continuous services is direct debit. The Council will encourage and promote this method of payment at every opportunity and Service Departments should assist in moving customers to direct debit.
- 8.19 Methods of payment will be reviewed regularly to take advantage of technological advances to ensure the most efficient methods of collecting income are used.

Customer Service

- 8.20 Customers will be provided with the contact details of the originating department on any invoices issued in order that they have access to Officers with detailed and specific knowledge of the goods and/or services provided at all times.
- 8.21 All customers will be encouraged to take ownership of their financial affairs. Whilst it is not the role of the Council to provide a debt counselling service, customers will be signposted to external debt counselling services (such as the Debt Helpline and Citizens Advice Bureau) so that where a customer feels they are facing financial hardship they will be able to seek further support.

Collection of Non-Domestic Rates

- 8.22 The Non-Domestic Rating (collection and enforcement) Regulations 1989, outlines the recovery details. This policy must follow the guidelines in the Act. The flow chart at Appendix I indicates the process of statutory recovery.

Collection of Income – Council Tax

- 8.23 The Council Tax (Administration & Enforcement) Regulations 1992 outlines the recovery details. This policy must follow the guidelines in the

Act. The flow chart at Appendix 2 indicates the process of statutory recovery.

Collection of General Income

- 8.24 Recovery of debt is the responsibility of the RB&SC. Responsibility commences from the point the invoice is created on the Debtors system.
- 8.25 The flow chart at Appendix 3 indicates the Central Recovery Process and Appendix 5 indicates the Continuous Service Recovery Process for General Income.
- 8.26 Automated reminder letters will be generated when invoices remain unpaid beyond the agreed terms.
- 8.27 Where automated reminders do not elicit a response, pro-active recovery is undertaken. The preferred method for contacting customers is by telephone.
- 8.28 Where it has been established that a customer is experiencing difficulty in paying outstanding amounts, the RB&SC may arrange collection by instalment. The instalment plan should not exceed a period of six months. Where this is not possible the RB&SC will work with the customer to agree a mutually acceptable plan.
- 8.29 It is the responsibility of the RB&SC to ensure that all sundry debt outstanding to the Council from one debtor is pursued on a consolidated basis.
- 8.30 Outgoing Creditor payments may be offset against outstanding invoices after communication with the customer.
- 8.31 All debts that remain outstanding after the normal recovery process has been exhausted will be considered for legal action or referral to the Council's approved external collection agent or enforcement agent.
- 8.32 All outstanding debt is to be pursued until such time as it becomes uneconomic or disproportionate to the administrative effort required. In determining "uneconomic", account must be taken of the overall impact on the Council of non-pursuit of that debt including the impact on the Council's reputation.

Collection of unpaid Penalty Charge Notices

- 8.33 The Traffic Management Act 2004, outlines the recovery process for Regulation 9 and 10 Penalty Charge Notices and the Transport Act 2000,

outlines the recovery process for Bus Lane Penalty Charge Notice's. The flow chart at Appendix 6 indicates the process of statutory recovery.

Collection of Income – Adult Social Care

- 8.34 Within the Care Act 2014, recovery details are outlined. This policy must follow the guidelines within the Act.
- 8.35 The Care Act 2014 enables the local authority to make a claim to the County Court or Money Claim Online for a judgment to recover the debt. Plymouth City Council will consider the full range of alternative options in accordance with this Income and Credit Management Policy before proceeding to a County Court Judgment in the case of debt attributable to care and support costs.
- 8.36 A Deferred Payment Agreement must be offered in the first instance where this is applicable, if the person is receiving care in a care home or renting an extra care property. If a Deferred Payment Agreement is not applicable or is refused, then this needs to be recorded. See also the Deferred Payment Agreement Policy for full details.
- 8.37 Plymouth City Council will explore other suitable options with the person where a deferred payment is not applicable or is refused. These will include negotiation, using an advocate, supporting the family to gain a power of attorney or deputyship, the local authority applying to be a deputy and mediation.
- 8.38 Consideration to how different approaches will impact on someone's wellbeing will be taken at all times and effort should be made to resolve the issue positively using effective social work skills.
- 8.39 Consideration to be given to a person's mental capacity to manage financial affairs. Where this is in question, support from Livewell South West (social workers) will be sought, and where necessary a decision specific capacity assessment completed.
- 8.40 Where the person is deemed to have capacity then negotiating an agreement, mediation and arbitration options should be considered before the commencement of legal action, such as for example, applying for a County Court Judgment.
- 8.41 Where a person has an attorney for property and financial affairs or a deputy, these roles give the attorney or the deputy the legal authority to make the financial decisions on the person's behalf. Plymouth City Council will then need to consider the options of negotiation, mediation and arbitration with the attorney or deputy.

- 8.42 If the person is deemed to lack capacity and has no power of attorney or Deputy, then an application for a Deputy is required. Plymouth City Council will request a family member to apply for Deputyship (if this is appropriate). Where there is no suitable family member, or they chose not to act in this capacity, Plymouth City Council will explore other options which may include an application to become the Deputy or use of an external Deputy.
- 8.43 Where a person is deemed not to have capacity and it is suspected that some form of financial (or other) abuse has occurred, Plymouth City Council will take appropriate action, commencing with involving the Safeguarding Team.
- 8.44 Any debts occurring after the Care Act 2014 came into effect (01 April 2015) must have recovery action commenced within six years of the monies becoming due otherwise the debt will be written off. For any debts that have accrued prior to this date, the period for commencement of the recovery of that debt continues to be three years as previously set out under Section 56 of the National Assistance Act 1948.

The use of Third Parties and Legal Action – General Income

- 8.45 Legal action may be taken on debts with the exception of Environmental Health.
- 8.46 Legal action will be instigated on behalf of the authority by the RB&SC or Legal Services, following consultation with the department that originated the debt. Where the recovery process is the responsibility of the originating department, that department will instigate legal action.
- 8.47 Legal Action will be instigated in accordance with legal requirements stated in the Pre-action Protocol, detailed in Appendix 4.
- 8.48 For debts considered uneconomical to refer for legal action, the use of tracing and collection agents will be considered prior to any decision to write off the debt.
- 8.49 Where the council incurs additional costs as a result of non-payment e.g. court costs, these will be the responsibility of the originating department and added to the outstanding debt and (where allowed under statute) recovered from the customer.

Use of External Collection and Enforcement Agents

- 8.50 The Council has a contract with approved external collection and enforcement agents, and these should be used in all cases. The distinction between collection agents and enforcement agents lies in the legal authority and stage of the debt recovery process at which they operate.

Collection agents primarily attempt to recover debt through communication and negotiation, while enforcement agents act on behalf of the courts and have legal authority to seize assets to recover debt if a court order is not adhered to.

- 8.51 The services of external collection agents may be used for the collection of sundry debts including Adult Social Care. For these types of debt, without a court order the collection agents will be used to discuss and negotiate with the debtor.
- 8.52 Regarding Adult Social Care debt, before referral to external collection agents there must be reason as to why the referral is considered appropriate, taking into account circumstances of the debtor, their capacity, vulnerability and what other support the debtor has (for example, from family or through the care provider).
- 8.53 The external collection and enforcement agents may make personal visits to customers when the normal reminder procedures have been exhausted.
- 8.54 In these situations, the external collection and enforcement agent will be acting in the capacity of representative of the Council, and due consideration will be given to the individual circumstances of the customer.
- 8.55 All external collection and enforcement agents shall be required to adhere to a Code of Conduct, which complies with and extends beyond any statutory requirements. The Code of Conduct shall be determined in the Corporate Contract for Enforcement Agent Services.
- 8.56 Where the council employs third party collection agencies, these agencies may apply their own costs to the amount to the recovered.

Other Legal and Enforcement Action

- 8.57 Other forms of recovery action that may be used to secure a debt are:
- Civic claims in either High or County Court
 - Third Party Debt Order
 - Attachment of Earnings
 - Attachment of Benefits
 - Charging Orders
 - Orders for Sale
 - Filing for Bankruptcies & Liquidations
 - Statutory Demands
 - Taking control of goods
 - Committal to prison
 - Deferred Payment Agreements

Bad Debts and Bad Debt Write Offs

- 8.58 Full details of the correct procedures for the write off of debt can be found in the Bad Debt Write off Procedure.
- 8.59 If the invoice is valid, the charges are due and all viable means of collection have been exhausted, the debt should be written off. Invoices that have been incorrectly raised must be cancelled by being credited and not written off.
- 8.60 Departmental provisions for bad debts shall be reviewed on a periodic basis. Sufficiency of provisions will be amended annually.
- 8.61 S151 Officer, or any Officer delegated by him/her, must approve the write off of any debt in accordance with the Bad Debt Write off Procedure and Financial Regulations.

Insolvency / Bankruptcy / Receivership / Ceased Trading

- 8.62 Such debt should be written off as soon as a proof of debt has been lodged. Any subsequent income collected should then be written back to the relevant bad debt provision.
- 8.63 Responsibility for the monitoring of insolvencies and completion of documentation shall rest with the RB&SC (General Income, NNDR, Adult Social Care, Council Tax, Housing Benefit Overpayments). Representation at creditors' meetings should be the responsibility of Legal Services.

Dispute Management and Credit Notes

- 8.64 Responsibility for the management and resolution of all disputes, regarding service delivery and amount of invoice, remains with the originating department. Every endeavour should be made to ensure disputes are resolved within two months.
- 8.65 All disputes regarding invoiced charges and fees shall be recorded, monitored and reported on via the relevant debt recovery system (currently the Civica system). Where this is not possible an email should be sent to the income recovery team (incomerecovery@plymouth.gov.uk).
- 8.66 Where an invoice is in dispute the recovery process should be 'delayed' on the relevant system pending resolution. In the case of sundry debts, the delay should be reviewed at least every two weeks and should be resolved within two months, except where prior agreement has been obtained from the RB&SC. If the delay period is not managed promptly, recovery will recommence at the point recovery had reached previously.

- 8.67 If the dispute is not resolved within two months this could result in the debt being cancelled, resulting in a reduction of service income.
- 8.68 Credit notes will only be raised to reduce or cancel charges where an error has occurred and must be properly authorised and documented. The member of staff raising the credit note must include a reason using the note function on the debtor's system.
- 8.69 Credit notes must be raised and authorised immediately to correct the error, or as soon as the mistake is realised.

Suspending Recovery

- 8.70 'Suspending' (stopping) recovery action on the sundry debt system should only occur in the event of specific circumstances, such as hardship/financial difficulties, debt respite (Breathing Space), the death of a customer, payment investigation or dispute (this list isn't exhaustive) and on receipt of the appropriate evidence and/or confirmation. The member of staff must include a reason for the suspension using the note function on the debtor's system.

Management Reporting

- 8.71 Levels of debt will be monitored on a regular basis using system generated reports by appropriate Officers.

9. Policy Review

- 9.1 This policy shall be reviewed periodically by the S151 Officer and approved through the relevant decision-making process.

10. Useful Contacts & Links

General Income (RB&SC)

Tel: (30)4443

E-mail: incomes@plymouth.gov.uk

NNDR (RB&SC)

Tel: (30)4966

E-mail: businessrates@plymouth.gov.uk

Client Financial Services (RB&SC)

Tel: (39)8155

E-mail: CFServices@plymouth.gov.uk

Council Tax Helpdesk (RB&SC)

Tel: (30)4924

Legal Department (Debt Recovery)

E-mail: debtrec@plymouth.gov.uk

Civica Authority Financials – Debtors User Manual

Document Library/All/Training Manuals-ICT/Debtors

Financial Management webpages on Staffroom

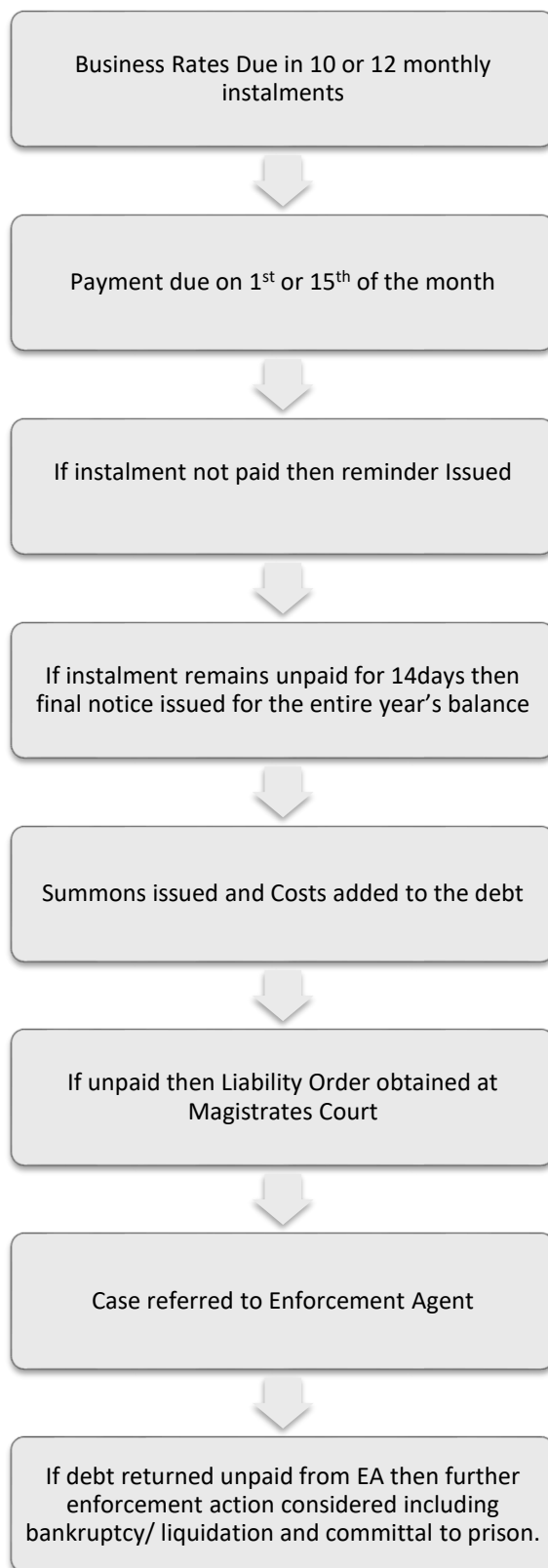
<http://www.plymouth.gov.uk/homepage/staffroom/finmgt.htm>

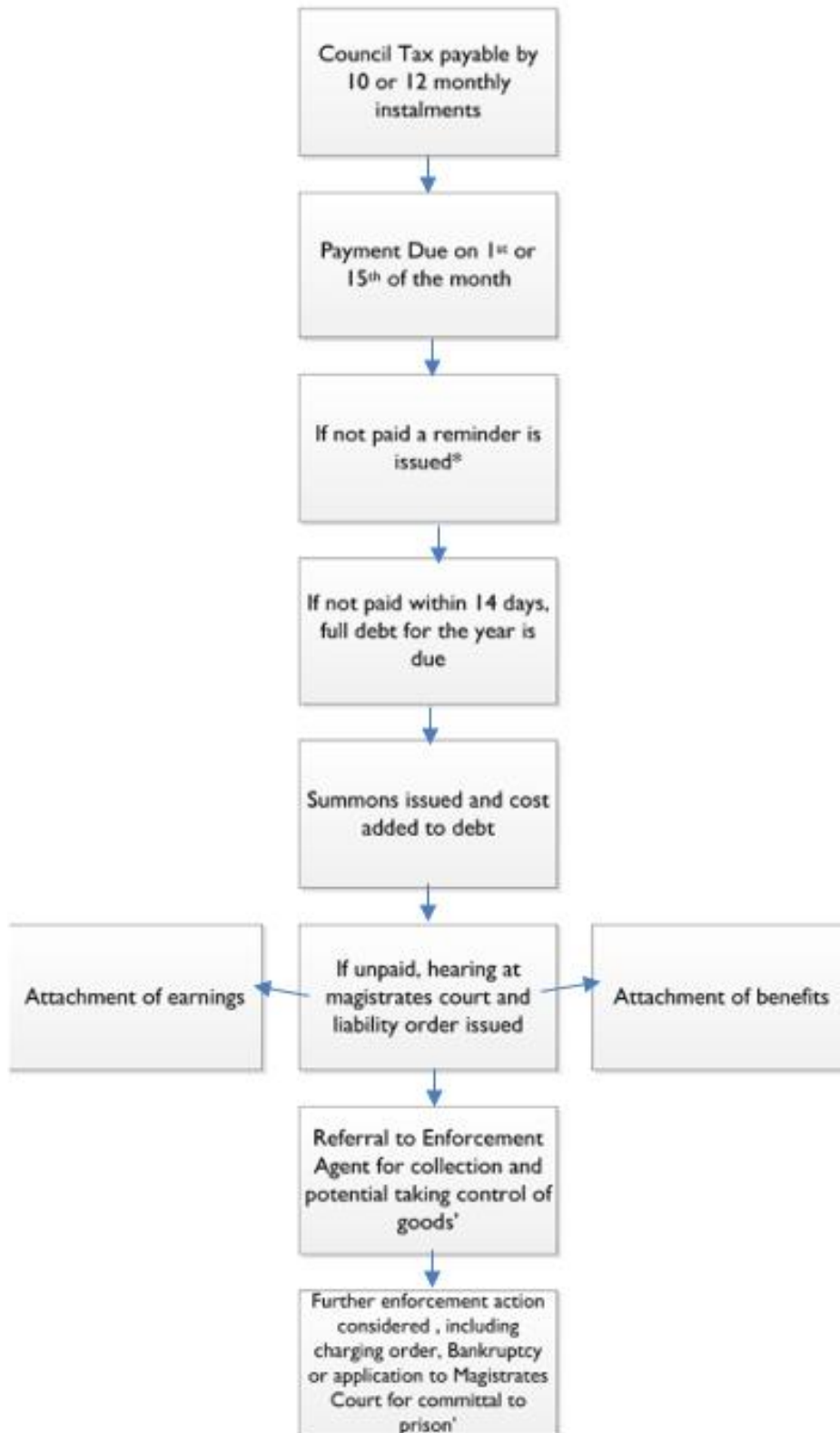
Online payments

<http://www.plymouth.gov.uk/homepage/general/onlinepayments.htm>

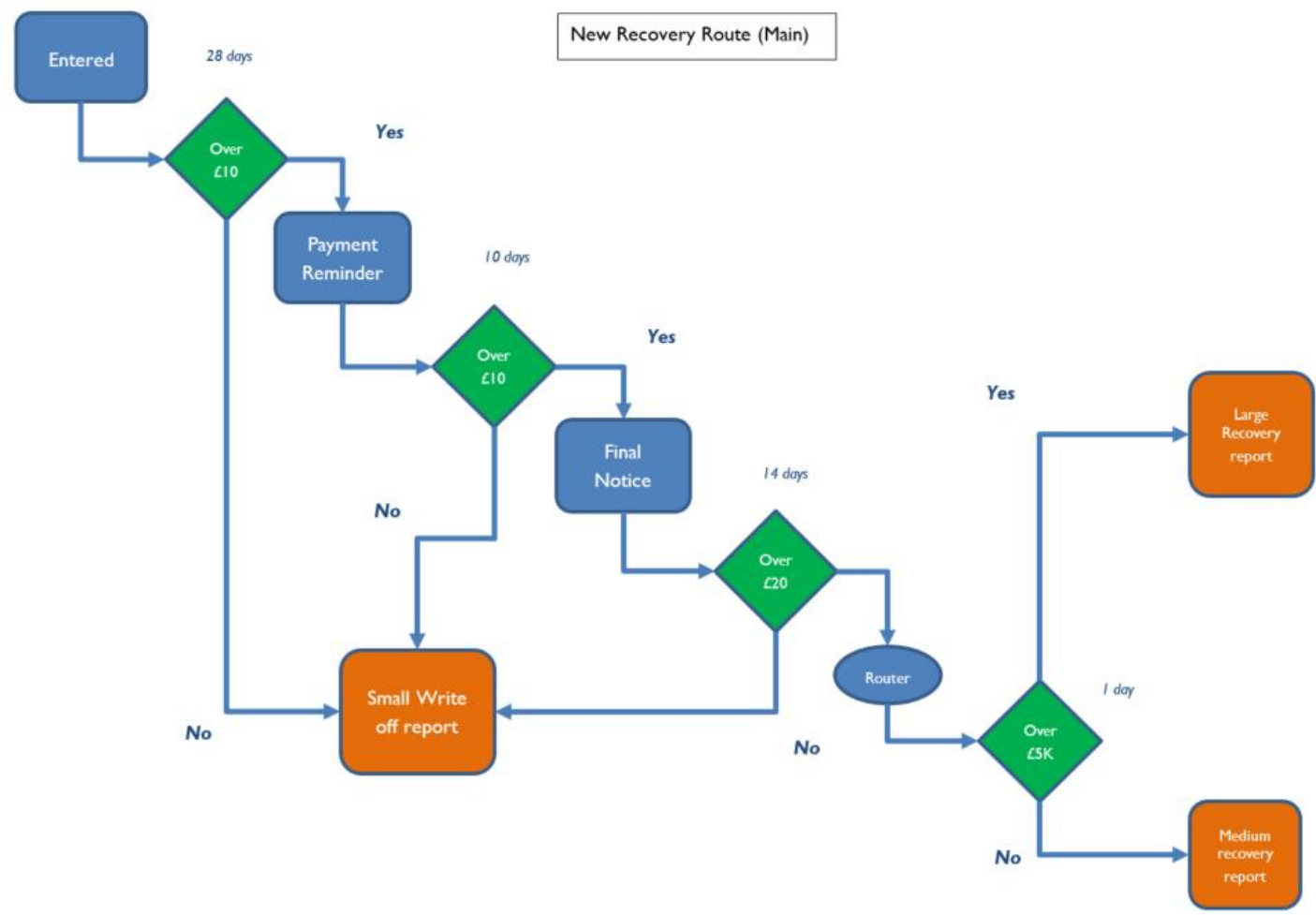
11. Glossary of Terms

Term	Description
Financial regulations	A number of rules that must be followed in order to ensure that public accountability and high standards of financial integrity are exercised in the use of public funds.
S151 Officer	S151 Officer (S151 Officer)
CMT	Corporate Management Team
FMT	Finance Management Team
RB&SC	Revenues, Benefits and Service Centre
MTFP	Medium Term Financial Plan
NNDR	National Non-Domestic Rates (more commonly known as Business Rates)
Statutory services	Services that the Council is required to provide by statute (written law)
ECA	External collection agent
Delay recovery	Process by which the invoice is manipulated to delay production of notices/reminders.
Suspend recovery	Process by which the invoice is manipulated to temporarily stop production of notices/reminders.
Pro-active recovery	Targeting specific debtors or types of debt for more robust recovery action e.g. telephoning customer to obtain payment.
Recovery process	A chain of events taken to ensure payment of outstanding invoices.
Income	Money due to the authority for services provided.
Credit	Payment not being made by the invoice due date.
Payment terms	Agreed terms for payment of an invoice.
Bad debt	Non-payment of income that is due to the Council, resulting in the debt being written off.

APPENDIX I - NON-DOMESTIC RATES

APPENDIX 2 - Council Tax Recovery

APPENDIX 3 - Central Recovery Route



APPENDIX 4 - Pre-Action Protocol

The Council shall comply with the re-action Protocol for Debt Claims as annexed to the Court's Civil Procedure Rules.

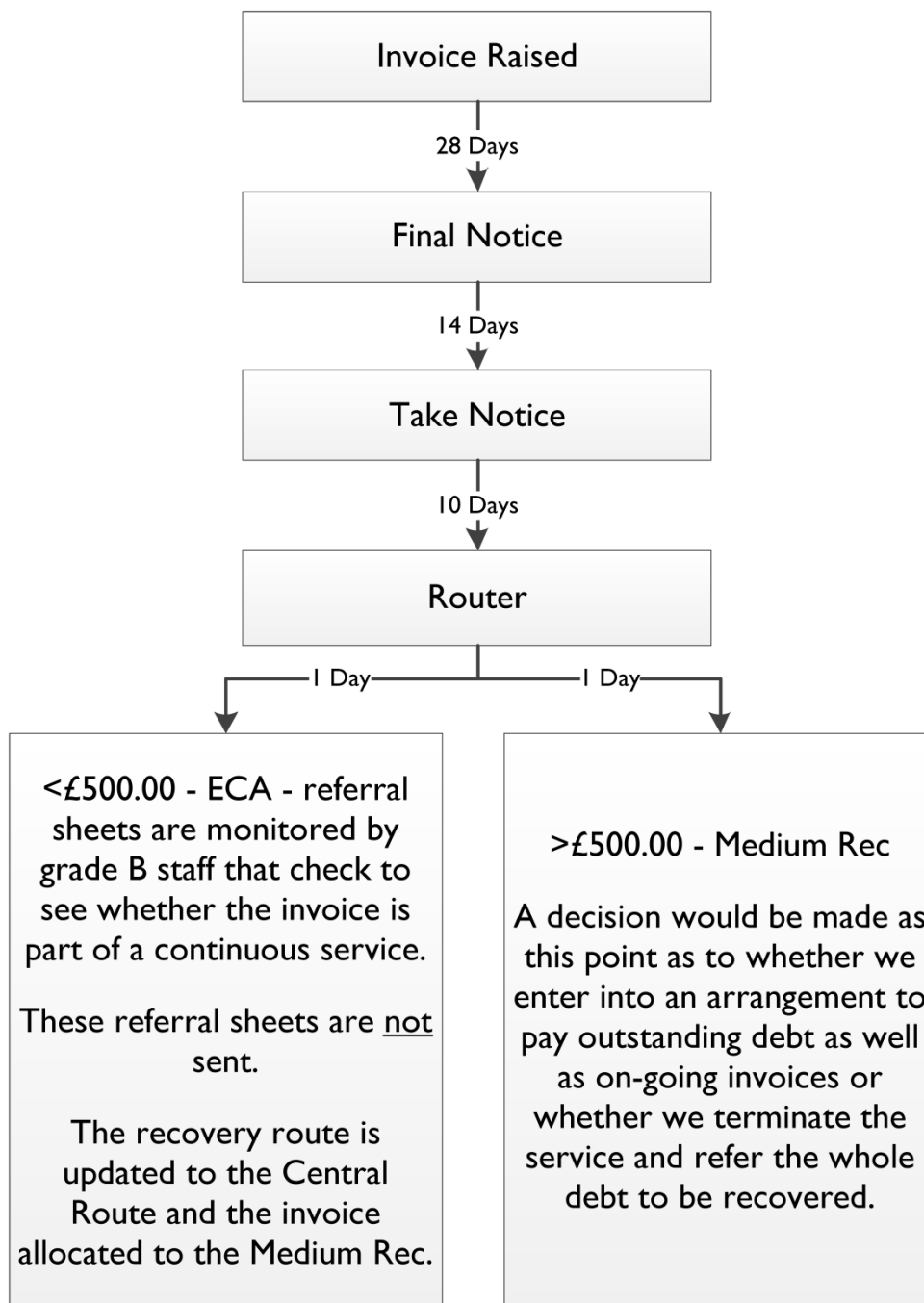
This Protocol applies to organisations and persons (including sole traders) operating a business with whom the Council deals. In this Protocol the Council is "the Creditor". Under the Protocol debtors shall be sent a Letter of Claim before proceedings are started. The Letter of Claim shall–

(a) contain the following information –

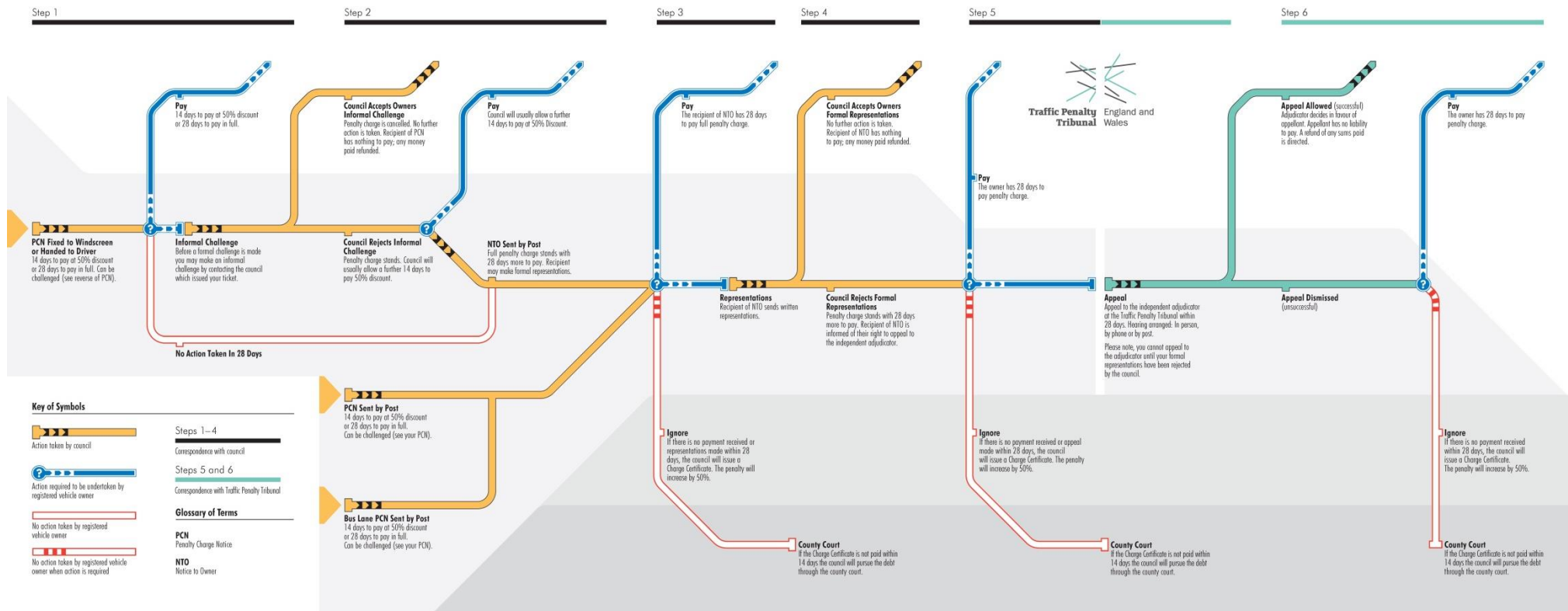
- (i) the amount of the debt;
- (ii) whether interest or other charges are continuing;
- (iii) where the debt arises from a written agreement, the date of the agreement, the parties to it and the fact that a copy of the written agreement can be requested from the creditor;
- (v) where the debt has been assigned, the details of the original debt and creditor, when it was assigned and to whom;
- (vi) if regular instalments are currently being offered by or on behalf of the debtor, or are being paid, an explanation of why the offer is not acceptable and why a court claim is still being considered;
- (vii) details of how the debt can be paid (for example, the method of and address for payment) and details of how to proceed if the debtor wishes to discuss payment options;
- (viii) the address to which the completed Reply Form should be sent;

(b) do one of the following –

- (i) enclose an up-to-date statement of account for the debt, which should include details of any interest and administrative or other charges added; or
- (ii) where no statements have been provided for the debt, state in the Letter of Claim the amount of interest incurred and any administrative or other charges imposed since the debt was incurred;

APPENDIX 5 - Continuous Service (Trade Waste, Licensing)

APPENDIX 6 - Parking Penalty Enforcement Process



APPENDIX 7 - Write Off Debt Approval Levels

Value of Debt	Who can approve it?
Up to £40	Nominated recovery Officers
Up to £200	Nominated recovery Officers (Grade E and above)
Up to £1,000	Nominated Officers (Grade H and above)
Up to £10,000	Heads of Service and other nominated Officers of the Strategic Director of Corporate Services.
Up to £100,000	Responsible Finance Officer (Section 151 Officer)
Up to £200,000	Cabinet Member
All debt over £200,000 unless covered by below exception.	Cabinet
Unlimited in the case of bankruptcy or liquidation/CVA/death/no assets/no trace	Responsible Finance Officer or other senior finance Officer nominated by him.