

# Debt Management Policy

London Borough of  
Barking and Dagenham

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## 1.0 Introduction

- 1.1 The Council has a duty to recover outstanding debts and in doing so ensure that its processes are fair to everyone. The corporate debt management policy is established so that the Council minimises debt and maximise rates of collection, is consistent in its approach and ensures that the Council assists customers who experience financial difficulty and seeks to prevent debt escalating.
- 1.2 This policy applies to all sums owing to the Council and has been developed to ensure a consistent approach to the management of debts across the Council. The main types of debt are:
- Council Tax
  - Rent for council properties including houses and flats, garages as well as leasehold charges
  - General Income – the fees and charges made for a wide range of Council Services such as adult social care. General income also includes loan repayments and salary overpayments and commercial property
  - Business Rates
  - Housing Benefit Overpayments – this occurs when benefit is paid that the claimant is not entitled to
- 1.3 The key aims of this policy are as follows:
- To maximise the level of income collected by the Council by:
    - implementation of a transparent charging policy
    - accurate and timely billing
    - reducing the level of debt arising
    - effective and timely recovery processes that seek to prevent debt escalating
    - utilising the appropriate recovery method by debt type
  - To recognise that causes of debt vary and recovery methods should be focused accordingly. Debt will be categorised and segmented so that where possible a personalised service is provided with methods of recovery focused by type, with debtors' circumstances understood identifying the larger proportion of debtors who struggle to pay as opposed to the small minority who can be classed as "won't pay" so that unsustainable debt levels are prevented.
    - *Those that struggle to pay* – will receive appropriate assistance and support through debt management and benefit advice, helped to make and adhere to payment arrangements and understand options to minimise costs in the future.

- *Those identified as 'Won't Pay'* will have the appropriate tools of recovery focused on them depending on individual's circumstances and the assets or income they have.
- To ensure that debts are managed in accordance with legislative provisions and best practice.
- To foster good financial management and control across the council
- To ensure income relating to all types of debt is to be handled in accordance with the Council's Constitution, the Financial Rules and this policy.
- To ensure performance in relation to debt recovery is reported through the relevant management structures of the Council.
- To implement a holistic approach to debtors that will ensure that each debtor can understand their overall indebtedness to the Council.

## **2.0 The principles of good practice**

2.1 There are a variety of reasons why debt is created. Putting effective processes in place; charging and invoicing accurately and speedily, ensures that debts raised are correct and do not discourage timely payment. Customers fail to make payments for a variety of reasons. Understanding the debt and the debtor can ensure targeted recovery methods are utilised. Where people genuinely have difficulty maintaining their payments; the Council will make every effort to help. Others may deliberately set out to delay or not make payments at all. In these situations, the Council will act to secure and recover payments. Where appropriate the Council will charge additional fees to cover the cost of the action and reduce the burden on those people who pay charges promptly.

2.2 The Council will follow the principles of good practice set out below:

- Utilise a holistic approach to all debts owed to the Council by individual debtors
- Utilise and promote on-line and self-service methods, with these being the default method of delivery while ensuring that vulnerable customers are not excluded or disadvantaged by this process
- Fair charging policies for community and residential care that are reviewed by the Council regularly
- Payment in advance for services where possible
- Accurate and prompt billing
- Promote Direct Debit as the default method of payment

- Provide advice on ways to prevent debt level rising, reducing bills and maximising income
- Consider special payment arrangements for those customers experiencing financial difficulties
- Keep customers informed
- Take appropriate recovery action
- Multiple debt management - where the Council is aware of more than one debt owing to the Council
- Review and write off debt where appropriate

### **3.0 Charging Policies**

3.1 The Council may charge for all services where allowable

3.2 The council will design charging policies which are coherent and cost effective. Policies will be designed to be fair and easy to understand and administer.

3.3 Charges should cover the full cost of the service unless there is an explicitly agreed subsidy or an alternative means of funding.

3.4 Individual services and departments will regularly review charging policies and fee levels to check that charges are adequate and are applied to all chargeable services.

### **4.0 The Council Payment Options**

4.1 Where payment can be taken before a service is provided these cases are to be identified and payment taken in advance, ensuring that no debt is raised in these cases.

4.2 When this is not possible and a debt is raised, the easier it is to pay the more likely it is that payment will be made. For recurring charges, Direct Debit is the easiest payment method for customers and is the most efficient for the Council helping keep the cost of collection as low as possible. For recurring debts, the Council will propose Direct Debit as the default method of payment to all customers unless they are unable to pay this way. Where a customer is unable to pay by Direct Debit or it's not appropriate (e.g. for a 'one off' bill) the Council will provide a choice of convenient methods of payment with electronic billing and payment as the default method.

- 4.3 The Council's default method will be electronic, either by Direct Debit or electronic transfer. These methods being the most convenient for the customer and cost effective for the council.
- 4.4 Services will provide a range of options to reduce the reliance on cash transactions. The current payment options are Direct Debit, Debit and Credit Cards (allowing payments to be made 24 hours a day, 7 days a week by the Council using the automated telephone line or online facility, regular transfers (standing orders), PayPoint and Post Office. Payment options are to be kept under review and where possible and cost effective further options will be utilised.

## **5.0 Prompt and Accurate Billing**

5.1 The council recognises that prompt invoicing and billing is important in reducing the debt burden. The Council will:

- produce accurate and clear bills promptly
- respond quickly to changes in circumstances and applications for exemptions, discounts, reductions, rebates and reliefs
- produce clear bills in plain English and show:
  - what the bill is for and the period of liability
  - the amount due and, where appropriate, the instalment amounts and payment due dates
  - how to make a payment or deduction from earnings or benefit
  - a contact point for enquiries - including the Council website details

5.2 Wherever reasonable, the Council will require payment before service to maximise income collection.

5.3 The Council cannot eliminate the issues arising from individuals and families on low incomes which have been increased by the greater use of "Zero Hours" contracts which add an uncertainty to the of level of pay. The approach to recovery must therefore be sensitive to individual circumstances and will seek to assist in preventing debt levels from becoming unsustainable.

## **6.0 Recovery Processes and securing the debt**

6.1 The Council's approach will be consistent, transparent, firm, fair and courteous.

- 6.2 Consistency means taking a similar approach in similar circumstances to achieve similar ends. The Council aims to achieve consistency in the advice it gives, the use of its powers, and the recovery procedures used.
- 6.3 The Council recognises that consistency does not mean simple uniformity and will take account of many variables such as the individuals needs and ability to pay and the need to secure the debt on behalf of the Council
- 6.4 Transparency is important in maintaining public confidence; helping people to understand what is expected of them and what they should expect from the Council and clearly explaining the reasons for taking recovery and enforcement action.
- 6.5 Recovery action will be taken in a timely manner and wherever possible technology will be utilised to automate and expedite processes.
- 6.6 A written explanation of any rights of appeal against formal enforcement action will be given before or at the time the action is taken.

## **7.0 Range of recovery methods**

7.1 A range of recovery options will be used where arrangements to pay have broken down. The choice of recovery method will depend on a number of factors including the method available for a particular type of debt, but options can include:

- Attachment of Earnings Order
- Deductions from benefit
- Enforcement Agent action
- Charging Order
- Insolvency (bankruptcy) action
- Securing the debt by obtaining charging order against assets, repossession of Council property
- Enforced sale of assets
- Committal to prison
- Use of a Debt Collection Agency

7.2 The Council will always take recovery action where a customer does not pay and does not say they are having difficulty paying. If the customer tells us early enough that they are having problems and we agree a

special payment arrangement, we will not take any further recovery action. However, if we have started recovery action (e.g. we have sent a court summons) and subsequently make a special payment arrangement we will continue with recovery action and ask the court (magistrate or county) for an order, in order to protect the Council's position.

7.3 When a customer tells us they cannot pay the Council will offer advice on ways to reduce their bill and maximise their income. Staff involved in the recovery of debts are trained on anti-poverty and social inclusion awareness so they can:

- inform customers of their entitlement to Housing and Council Tax Benefits, discounts, reliefs and exemptions
- inform customers of the general availability of other income related benefits such as Job Seeker's Allowance, Child Tax Credits, Working Tax Credits, Pension Credits and Guarantee Credit
- refer customers to the Council's partners – Voluntary Sector Advice Services for help and advice on all benefit entitlements
- care will be taken to identify customer who are vulnerable and or struggling to pay bills and signposting them to other support schemes such as Discretionary Housing Payments (DHP), the Council Tax Support Scheme (<https://www.lbbd.gov.uk/residents/benefits-and-support/council-tax-support/>) and Discretionary Council Tax Relief (<https://www.lbbd.gov.uk/residents/council-tax/council-tax-discounts-and-disregards/discretionary-council-tax-relief/>)

7.4 The table below shows the different types of debt and stages of recovery. The table indicates which recovery method the Council is likely to use. In some circumstances the recovery method may differ because of the size of the debt or the customer's circumstances.

7.5 Council Tax has high volumes of recovery action, so reminder, final and summons notices are generated automatically. However, cases can be automatically withheld using 'hold indicators' (e.g. where a special arrangement is in place or work is outstanding). Cases at summons stage are individually checked before the summons is issued.

7.6 If a customer is vulnerable (e.g. elderly, seriously ill, mental health issues) and this makes it difficult for them to pay, the Council will try to avoid recovery action and provide the assistance they need to make payment.

The Council can only do this if the Council knows the customer's circumstances.

7.7 The Council will always ensure that the recovery method is appropriate for the amount of debt. Enforcement Agents will not be engaged to enforce for any debt less than £125.00. Debt collection agencies without enforcement powers may be engaged for lower amounts.

7.8 Where the debt is for an ongoing service provided by the Council which the Council does not have to provide (for example Trade Refuse) the Council will stop providing the service until the debt is paid or an acceptable special payment arrangement is made.

7.9 The Council will follow the principles of enforcement outlined below:

- Our approach will be consistent – with the aim of achieving consistency in the advice the Council give, the use of our powers and in the recovery methods the Council use
- Our actions will be transparent – to help customers to understand what is expected of them and to explain the reasons for taking any recovery action.
- Our action will be proportional – the Council will only use the most severe legal sanctions for the most difficult high value cases or where there is persistent non-payment
- Make additional arrangements for Social Care charging

7.10 The collection of Adult Social Care charging will take into account the vulnerable nature of many of the customers. Although the collection process will be similar to other types of sundry debt the Council will take additional steps to try and understand the customers' personal and financial circumstances so that the Council can act appropriately in the best interests of the customer, other service users and the Council.

7.11 Use of eviction from Council properties will be a last resort and is governed by legislation. Compromise agreements may be sought with Housing where possible. For example, re-locating a family into a smaller more affordable property, although this is limited due the scarce nature of suitable property.

## **8.0 Tracing**

8.1 The Council will make all necessary attempts to trace any debtor that has absconded to ensure that payment is received.

8.2 This will include checking internal and external sources of information and sharing information with other authorities and using tracing agents as appropriate. The timeliness of tracing, allowing time for the debtor to reappear will be considered before the debt is submitted for write off.

## **9.0 Enforcement Agents (EAs) and EA Management**

9.1 The ability to refer debt to enforcement agents (previously known as bailiffs) is an important tool in the recovery process. The Council appreciates the sensitivity attached to the use of enforcement agents.

9.2 The Council will seek to use enforcement agents only where it has determined that this is the most effective collection method for the debt in question.

9.3 Enforcement agents will be selected with regard to their performance and customer service standards and capabilities. The council will balance the requirement for effective debt collection with the reasonable and lawful behaviour of its enforcement agent functions and contractors.

9.4 Enforcement agent performance and contract management will be in place to ensure that compliance with codes of conduct good practice. The Council manage performance across a range of areas including charges, hours of operation, levels and accuracy of taking control of goods

9.5 Enforcement agent payments and incentives will be reviewed as part of the procurement process to align performance to council objectives, maximise income and minimise cost to the council and the customer.

9.6 Enforcement agent services will comply with the national standards for enforcement agents.

## **10.0 Debt Advice, Prevention & Multiple Debt Management**

10.1 The Council recognises that some customers will experience financial difficulty either for short or longer periods. Customers who find themselves in debt will often have multiple debts and often experience a spiral of debt that affects the whole family and life quality and becomes a way of life. All staff dealing with debtors in difficult circumstances must be cognisant of this and recognise the effect being in debt has. For example:

- A parent, recently separated may need help to ensure debt does not escalate, claim benefit and put accounts into their own name. They require help to arrange regular payments for all bills and assistance in making payment arrangements to pay off any arrears accrued

during a difficult separation, where focus had been on the children's welfare.

- 10.2 Customer Service and Recovery staff will work with colleagues and families or individuals in debt to understand their particular life circumstances and focus help around these.
- 10.3 Customers will be signposted to assistance in managing debt using the Council's own help and independent partners (Appendix 2)
- 10.4 Where a customer owes more than one debt of the same type, these debts may be amalgamated.
- 10.5 The Council will seek to deal with all debt outstanding at the same time so that a holistic approach is adopted. If the Council are aware, through discussions with the customer or systems matching, that the customer has multiple debts with the Council, the Council will review those debts in total and try to agree a special payment arrangement.
- 10.6 The arrangement will attempt to maintain ongoing payments and reduce arrears for all debts owed to the Council. See Appendix 2 for priority debt guidance.
- 10.7 Where the customer has multiple debts, it is also likely they will owe money to other organisations. The Council does not itself offer debt management advice to individuals or businesses. However, the Council recognises the valuable role of local advice agencies in providing assisting to local residents experiencing difficult in managing debt and prioritising repayments to creditors and in maximising income available to the debtor. For example, money advice for individual debtors is available through Capitalise, London's debt advice partnership. Appointments for clients can be made through Barking CAB. In addition, the Council will point residents to on-line self budgeting tools available at no charge as apps from the internet.

## **11.0 Staff in arrears**

- 11.1 It is not acceptable for Council Members, staff or those employed by Elevate to owe money to the council.
- 11.2 The council may use the information it holds on staff to assist with debt recovery and to make arrangements to clear the debt by salary deduction or Direct Debit.

## **12.0 Treatment of costs**

- 12.1 The Council will seek to levy and recover all costs and fees that are legitimately due from the debtor to the Council or its agents. Only in cases where it would not be in the public interest to pursue costs/fees will they be waived.
- 12.2 A distinction will be drawn between costs which are withdrawn because they were charged incorrectly and costs which are written off because they are considered to be irrecoverable under the guidance of this policy.
- 12.3 Where costs are considered as irrecoverable they shall be treated in the same manner as other debts for the purpose of this policy.

## **13.0 Debt Analysis and Segmentation**

- 13.1 The Council will use all available information to segment existing uncollected debts to maximise recovery before these are considered for write-off. Write offs of irrecoverable debt will be in accordance with the Council's Financial Rules set out in the Constitution as described below. Write off's will be agreed in line with the Revenues & Benefits Write Off Policy (Appendix 3) and total levels of write off each quarter will be reported to Cabinet.
- 13.2 Data will be considered from a range of sources and the Council will work with partners to develop an approach to debt recovery allowing the use of analytical software to sort and segment older debts so that it can be processed by the most appropriate specialist according to the data analysis undertaken.
- 13.3 The purpose of this approach is to take a fresh view of older debts and use specialist technical knowledge to maximise income that the Council may previously have found uncollectable.

## **14.0 Write-Off Policy (all debts)**

- 14.1 The Council will take all necessary action to recover what is due. Debts will be subject to the full recovery, collection and legal procedures as outlined in this policy.
- 14.2 The Council recognises that where a debt is irrecoverable, prompt and regular write-off of such debts is good practice.
- 14.3 Irrecoverable debts are subject to the Financial Regulations and Rules set out in the Council's Constitution. The rules are contained within the Council's constitution which is agreed from time to time by the Council, see link to the meetings that consider and agree the Financial Regulations

and Rules:<http://modern.gov.barking-dagenham.gov.uk/ieListMeetings.aspx?CIId=626&Year=0>

14.4 The Council's Financial Regulation and Rules stipulate write-off relating to revenues and benefits are to be carried out in accordance with the write-off policy as agreed from time to time by the Cabinet. The proposed write off policy relating to Revenues and Benefits is set out at Appendix 3.

14.5 In considering the approval to write off a debt the authorising staff shall give consideration to:

- This Policy
- The interest of the local community
- The Council's fiduciary duty
- The rights of the customer and the effect of continued enforcement action

14.6 Any member of staff, Member or Contractor who has an interest in any debt must not participate in the decision-making process regarding the write off of the debt and must declare their interest.

14.7 For the purposes of this policy an interest includes those in the following list, however, the list is not intended to be exhaustive. Where a member of staff is unsure whether they have an interest, they should seek advice from their line manager or internal audit.

- The debt is owed by a relative, including relatives by marriage
- The debt is owed by a relative of a current or former partner
- The debt is owed by a friend or neighbour
- The debt is owed by an organisation of which you are a member
- The debt is owed by an organisation of which a relative is a member
- The debt is owed by a company or individual with whom you have a business relationship

## **15.0 Write off Monitoring**

15.1 The Council will monitor the implementation of the process to ensure that it is effective. Monitoring will include:

- quarterly reports to Cabinet on Debt Management performance and write off levels
- rate of collection – to identify our performance against the targets set for the collection of debts
- setting targets to improve performance

15.2 Performance reporting will continue to be on an income stream and collection rate basis. The effectiveness of the policy will be seen through the levels of income that individual services achieve.

## **16.0 Review of this policy**

16.1 The Council is committed to continuous improvement and it is critical that new approaches and ways of working will be introduced. This policy will be reviewed annually to allow it to be updated and to take any service improvements or changes into account.

## Appendix 1: Table 1: Debt Types & Recovery Methods

	Request for Payment	1 <sup>st</sup> Reminder 2 <sup>nd</sup> Reminder	Claim Form or Summons	Court	Enforcement agents and taking control of goods	Attachment of Earnings or Benefit	Charging Order	Bankruptcy or Insolvency	Committal to Prison	Withdrawal of Service / Eviction
Council Tax	Annual Bill	✓	✓	Magistrate	✓	✓	✓	✓	✓	x
Business Rates	Annual Bill	✓	✓	Magistrate	✓	✓	✓	✓	x	x
Rents	Weekly Charge	✓	✓	County Court	✓	✓	✓	✓	x	✓
Parking Charge Notice (PCN)	PCN	✓	✓	County Court	✓	x	x	x	x	x
Lease-holders	Annual Bill	✓	✓	County Court	✓	x	✓	✓	x	x
Commercial Rents	Quarterly Bill	✓	✓	County Court	✓	x	✓	✓	x	x
Trade Refuse	Invoice	✓	✓	County Court	✓	x	✓	✓	x	✓
Hall Hire	Invoice	✓	✓	County Court	✓	x	✓	✓	x	x
PCT invoices	Invoice	✓	✓	County Court	✓	x	✓	✓	x	x
Nurseries	Invoice	✓	✓	County Court	✓	x	✓	✓	x	x
Care Lines	Invoice	✓	✓	County Court	✓	x	✓	✓	x	x
Fairer Charging Contribution	Invoice	✓	✓	County Court	✓	x	✓	✓	x	x

## **Appendix 2: Advice on priority debts from the Citizens Advice Bureau**

The following advice is supplied to debtors by the Citizens Advice Bureau for information. It does not override the Council's debt policies and process. The full advice can be found here: <https://www.citizensadvice.org.uk/debt-and-money/help-with-debt/>

### **Priority debts include:**

- Priority debts are generally those that can have serious consequences such as sending you to prison or losing your home, see <https://www.debtadvisorycentre.co.uk/blog/what-are-priority-and-non-priority-debts-0-4212-0>
- Mortgage or rent arrears. If you don't pay these, you could lose your home
- Gas and electricity arrears. If you don't pay these, you can have your supply disconnected
- Council tax arrears. If you don't pay these, the local authority can go to court and get a summary warrant to enforce the debt. This may include arrears for water and sewerage charges
- Court fines such as fines for driving offences. If you don't pay these, the creditor can get a court order to recover the debt direct from your pay or freeze your bank account. If, after this, you still have unpaid arrears, you can be sent to prison
- Arrears of maintenance payable to an ex-partner or children. This includes child maintenance you owe to the Child Support Agency or Child Maintenance Service. If you don't pay this, the creditor can get a court order to recover the debt from your pay or your bank account. If, after this, you still have unpaid arrears, you can be sent to prison, see Child maintenance enforcement - sanctions by the court
- Income tax or VAT arrears. You can be sent to prison for non-payment of income tax or VAT
- TV licence or TV licence arrears. It's a criminal offence to use a television without a licence. You could be fined.

### **Non-priority debts include:**

- credit debts such as overdrafts, loans, hire purchase, credit card accounts and catalogues
- student loans
- Money borrowed from friends or family.

You can't be sent to prison for not paying non-priority debts. If you don't make any offers to pay, without explaining why, your creditors may take you to court. If you still fail to pay when the court has ordered it, your creditors can take further action. For example, they can get another court order which allows them take money from your bank account or your wages.

For benefits overpayments, you may get the overpayment taken off your benefit. This is called a third-party deduction. For what to do if you have been told you have been paid too much benefit, see Benefit overpayments.

Your local Citizens Advice Bureau will be able to provide you with information and provide contact details for the relevant person(s)/Department(s) to assist with managing your debt and repayment.

If you don't keep up payments under a hire purchase agreement, the lender may be able to take back the goods. Depending on how much you have paid, the lender may not need to get a court order first.

For more information about when a lender can repossess goods on hire purchase, see Hire purchase.

## Appendix 3 Write-Off Policy

Enforcement action is to be taken prior to considering write off.

All reasonable and economical debt recovery action should be taken before consideration is given to writing off a debt. The degree of enforcement action attempted should be dependent on the amount owed, the type of debt and the customer's personal circumstances where they are known.

Debts to be written off fall into two broad categories, firstly those debts that the Council is unable to collect and secondly those debts that are deemed uneconomic to collect. The following reasons are recognised as valid reasons for the write off of debts, subject to all appropriate action to enforce payment having been attempted.

*Unable to recover:*

- The customer is deceased and has left no estate
- The customer is subject to a formal insolvency order (*in such cases any accruing debt to be written off will only be up to the date of the order*)
- The debt has been remitted by the court
- It would cause the customer hardship to enforce payment, or it is in the interests of the Council or the wider community to write off the debt. This includes the use of the Council's powers under Section 49 of the Local Government Finance Act 1988 in respect of writing off a Non-Domestic Rate on the grounds of hardship when appropriate
- The customer has absconded/gone away and cannot be traced
- The customer is living outside the jurisdiction of the English Courts and is unlikely to return.
- The Court has refused to make an order in respect of the debt
- The customer has served a prison sentence to discharge the debt
- The debt is an overpayment of Housing Benefit which is deemed to be unrecoverable in accordance with the Housing Benefit General Regulations 1987 and the Department for Work and Pensions overpayment guidance manual
- The age of the debt precludes recovery or the debt as it is statute barred.

*Uneconomic to recover*

- It is uneconomical to take action to enforce payment if the amount is a small balance (under £10) or it is in the Council's interest to agree a negotiated settlement of part of the debt
- In general, recommendation for debts to be written off should be made only where one of the above categories applies. However, it is recognised that it is difficult to anticipate all potential circumstances where write off may be justified, and that on occasion it may be appropriate to write off a debt for other reasons. Where this is the case a full written report justifying the recommendation must be provided to the appropriate authorised Officer, who will make a decision regarding the writing off of the debt.

**Authorisation to write off debts**

The Council's Financial Rules allow for debts in relation to Revenues and Benefits to be written off in accordance with the debt write off policy as agreed from time to time by the Cabinet. For Revenues and Benefits in accordance with paragraph 14.3 of the Financial Rules debt write-off may be approved in accordance with the following table:

Value of Debt / Credit	Staff Authorised to Write Off Debt
Up to £2000	Head of relevant service area, i.e. Benefits, Revenues, Rents (Elevate)
£2000.01 to £10,000	Authorised Officer of Council Client Unit
Over 10,000	Strategic Director of Finance and Investment

Authorisation may only be given by means of an original signature. A single signature may be applied to a schedule of debts of individual amounts within a single category. Signed approved documents are scanned and stored for 6 years.

**Guidelines to authorising write off of debts**

In considering the approval to write off a debt the authorising staff shall give consideration to:

- This Policy
- The interest of the local community
- The Council's fiduciary responsibilities

- The rights of the customer and the effect of continued enforcement action.

## **Appendix 4 Links to Existing Policy & Policies**

### **Overview of Council vision and priorities: -**

<https://www.lbbd.gov.uk/council/priorities-and-strategies/vision-and-priorities/overview/>

**Corporate Delivery Plan:** - <https://www.lbbd.gov.uk/council/priorities-and-strategies/corporate-plans-and-key-strategies/corporate-delivery-plan/overview/>

**Single Equality Scheme:** - <https://www.lbbd.gov.uk/council/priorities-and-strategies/council-policies/equality-and-diversity-strategies/equality-duty/>

**Fraud Prosecution Policy** – the Council holds a ‘zero tolerance to fraudulent activity’:

<https://lbbd.sharepoint.com/sites/IntTp/FR/CounterFraud/Prosecution%20Policy.pdf#search=fraud>

**Members Code of Conduct** – <https://www.lbbd.gov.uk/wp-content/uploads/2014/11/Members-Code-of-Conduct.pdf>

**Customer Service Standards** – <https://www.lbbd.gov.uk/council/priorities-and-strategies/council-policies/customer-service-standards/our-customer-promise>

**Employee Code of conduct** – is in the constitution <http://moderngov.barking-dagenham.gov.uk/ieListMeetings.aspx?CId=626&Year=0>

**Whistle Blowing Policy:** - <https://www.lbbd.gov.uk/council/complaints-and-feedback/reporting-fraud/counter-fraud-work/>

# Appendix 5

**Appendix 5: Debt Management Flowchart**

