Philip Slawther, Principal Scrutiny Officer

020 8489 2957

philip.slawther2@haringey.gov.uk

21 March 2025

To: All Members of the Overview and Scrutiny Committee

Dear Member,

Overview and Scrutiny Committee - Thursday, 27th March, 2025

I attach a copy of the following reports for the above-mentioned meeting which were not available at the time of collation of the agenda:

8. COUNCIL TAX COLLECTION, SUPPORT FOR RESIDENTS & THE ROLE OF ENFORCEMENT AGENTS (PAGES 1 - 28)

Yours sincerely

Philip Slawther, Principal Scrutiny Officer



Report for: Overview & Scrutiny Committee

Title: Council Tax collection, Support for Residents & the role of

Enforcement Agents

Report

authorised by: Kari Manovitch (AD Customer Services)

Lead Officer: Andrew Mackie (Revenues Manager)

Ward(s) affected: All

Report for Key/

Non-Key Decision: Non-Key Decision

1. Describe the issue under consideration

1.1 This report is to respond to the Overview & Scrutiny Committee's request for information about how the Council deals with debt, including the use of Enforcement Agents, and what support we offer people to alleviate debt.

2. Recommendations

- 2.1 That the Committee note the contents of Appendix 1.
- 3. Reasons for decision
- 3.1 N/a.
- 4. Alternative options considered
- 4.1 N/a

5. Background information

- 5.1 As a billing authority, the London Borough of Haringey is responsible for the Levy, Collection and Recovery of Council Tax and Business Rates.
- 5.2 The amount of Council Tax due to Haringey for 2024/25 is £181m and it's higher next year. As the council's budget for 2025/26 shows, there is currently unsustainable pressure on the council's finances with a shortfall of £67.4m before savings are made for 2025/26. Therefore, it remains imperative that all avenues to collect these taxes are used by the Council, to fund vital services for the residents of Haringey.
- 5.3 The Council's Ethical Debt Collection Policy approved in 2021 put in place a number of important changes to how the council engages with residents to try and prevent payment defaults and debt, and to offer support to those who are struggling financially. One key change was to protect our lowest-income and

most vulnerable residents from referral to Enforcement Agents. This has removed thousands of residents from referral since 2021.

5.3 Appendix 1 provides details of the following:

- Council Tax collection performance
- Council tax facts and figures
- Our Ethical Debt Policy commitments
- · Additional measures to support residents introduced in the last year
- Support offered in our Reminder and Summons letters
- Haringey's collection processes
- Financial support team impact
- The Here to Help campaign
- Income maximisation team impact
- The role of Enforcement Agents
- Ensuring ethical behaviour by Enforcement Agents
- Enforcement Agents practice across London
- Why we have rejected an inhouse Enforcement Agents model

6. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes

The collection of Council Tax and Business Rates is the foundation of much of the council's service delivery and CDP commitments.

Tackling inequalities is a central objective for everything we do and drives the Ethical Debt Policy and the council's welfare and financial support work.

7. Carbon and Climate Change

N/a

8. Statutory Officers comments

This report provides and update for OSC to note and is not seeking a decision. Therefore, there are no implications for council finances, procurement, legal, governance or equalities arising from the contents of this report.

9. Use of Appendices

Appendix 1 – Presentation on Council Tax collection, Support for Residents & the Role of Enforcement Agents.

10. Background papers

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Haringey Ethical Debt Reduction Policy:

Agenda for Cabinet on Tuesday, 9th February, 2021, 6.30 pm | Haringey Council (Public Pack)Agenda Document for Cabinet, 09/02/2021 18:30



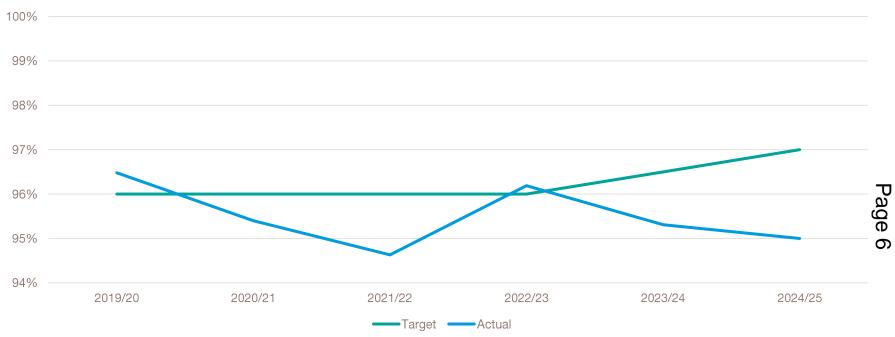
Council Tax collection, Support for Residents & the role of Enforcement Agents

Presentation for Overview & Scrutiny Committee 27 March 2025



Council Tax collection performance





- Uncollected council tax this year is worth £9m (5% of £180.9m)
- Next year's target is 95.75%, which will be challenging to achieve
- The increase in 2022/23 is due to the £150 Council Tax rebate which was applied to Council Tax accounts as instructed by central government in response to the increases in utility bills.



Council tax facts and figures

- We have **114,671 dwellings** in the borough
- 24,866 dwellings were in receipt of Council Tax Reduction (CTR) – 21.7%, as at January 2025. Of these, 14,582 pay no council tax (59% of all CTR recipients)
- The most common property band is Band C.
 £1,873.18 per year, £156 per month
- Over the past 10 years the Council Tax payable by residents has increased by 42%.
- Council Tax contributes 40% of the council's total revenue budget (£140m* of £349m)
- Haringey has a high level of rental properties, which means a high level of moves triggering high volumes of council tax changes. There is an estimated 30% turnover of residents in the borough annually.



Council Tax Bands 40000 35000 30000 25000 20000 15000 10000 5000 0 Α В C D Ε G Н

^{*}actual amount collected is much higher due to GLA portion

Our Ethical Debt Policy (2021) commitments



Cease the use of bailiffs for Council Tax for people on **very low-income (CTR recipients)** or **facing mental health concerns (known to Adult Social Care)** or **vulnerable** (registered with VRS). This has removed thousands of residents from referral to date.

Between April-Dec 2024, only 54% of debts with liability orders were referred to EAs, for a variety of reasons and many due to this policy.



Ensure our letters encourage residents in need to **contact us** if they are facing problems



Offer a **helpline** for getting assistance from the **Financial Support Team**, available to help all residents experiencing or at risk of financial hardship



Operate a Local Welfare Assistance Scheme – Haringey Support Fund



Operate the Haringey Here To Help campaign



Have an **Income Maximisation** team who help ensure residents are aware of their local and national benefits entitlements



There are also officers in Housing and Housing Demand who **support tenants** and those in **TA** with their finances and Benefits entitlements

Support offered in our reminder letters

How to pay





Bank payments to sort code 20-98-47, bank account number 43399710, account name London Borough of Haringey, Your reference is: 2307032

Pay cash where you see the Paypoint sign using the barcode on this letter

If you cannot pay

If you are on benefit or have a low income, you could get help through the Council Tax Reduction Scheme. Apply at Haringey.gov.uk click "Council Tax and Benefits"

If you are having financial difficulties, you can get independent help and advice please see the back of this letter.

To make a payment arrangement or get help, please ring us on 020 8489 1000

The barcode shown here can be used to make payment at any Post Office or PayPoint outlet.

Council Tax Reduction

If you are on Benefits or have a low income you might be able to get more help with your Council Tax.

Apply online at www.haringey.gov.uk Press "Pay, report, apply" then Apply for Council Tax Support and Housing Benefit.

You can get help to make an application for "Council Tax Support" from both Citizens Advice Haringey and Connected Communities, see below for their contact details.

Financial Help and Advice

Get free help and advice if you have money worries or are in debt:

- Haringev financial help and support haringev.gov.uk/heretohelp (020 8489)
- Citizen Advice Haringey www.citizensadviceharingey.org.uk (0800 240 4420)
- Stepchange www.stepchange.org (0800 138 1111)
- The Money and Pensions Service (MaPS) www.moneyhelper.org.uk

Direct Debit

Council Tax is due on the 1st of each month unless you pay by Direct Debit. Choose to pay on the 1st, 15th or 25th of the month.

Set up a direct debit go to www.haringey.gov.uk/dd or ring 020 8489 1000

Council Tax online with My Account

See your bills, balance and instalments at any time. Go to myaccount.haringey.gov.uk/

How to pay your Council Tax

Online at Haringey.gov.uk click "Pay Now"

By phone 24/7 at 0300 456 0520

Bank payments to sort code 20-98-47, bank account number 43399710, account name London Borough of Haringey. Please quote 2307032 as your reference and do not put any other words

Pay cash where you see the Paypoint sign using the barcode on this letter

Contact us

- You can let us know that you are moving home, apply for discounts & exemptions or tell us about other changes which may affect your Council Tax by visiting www.haringey.gov.uk/counciltax
- Telephone 0208 489 1000





Support offered in our summons letters

If you are unable to pay the full amount before the hearing date, please pay the following instalments:

2 instalments of £126.00 to be paid from 07-MAR-2025. The last instalment of £125.10 is due on 07-MAY-2025.

The Court will grant a Liability Order and we will add £17.00 to the total amount due. This is included in the arrangement.

If you need help or advice:

Email us at ctaxsummons@haringey.gov.uk, include your account number in the subject line.

Telephone us on 0208 489 1000.

Please see the back of this letter for independent help and advice and how to pay.

How To Pay



Pay online: www.haringey.gov.uk and search "pay it"



Automated payment line: 0300 456 0520



To pay by direct debit call 0208 489 1000

Powers of a liability order

We want to help you to pay. A liability order allows the Council to collect Council Tax by:

- Taking payment direct from your earnings
- · Taking payment direct from your benefits
- Ask an enforcement agent (formerly bailiff) to collect the money
- Put a charge on your property so that we get Council Tax when you sell.

Each time we take more action, the amount you have to pay goes up. Please contact us now to avoid further costs being added to your account.

Help and Advice

If you cannot pay this debt, we strongly advise you contact a debt advice service.



Haringey Here to Help offers a range of support to help you manage your finances, get budgeting and debt advice, and claim everything you are entitled to. Go to Haringey.gov.uk/heretohelp to find out more



citizensadviceharingey.org.uk 0800 240 4420

Money ⁹Helper

moneyhelper.org.uk 0800 138 7777



nationaldebtline.org

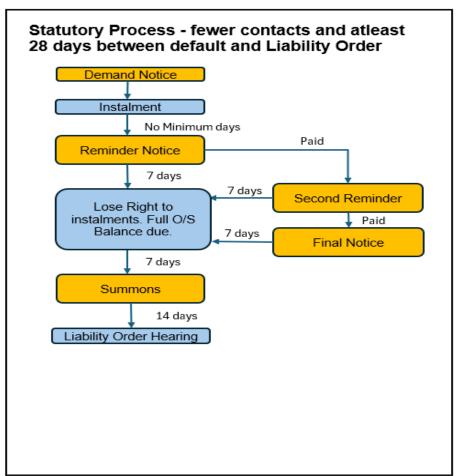


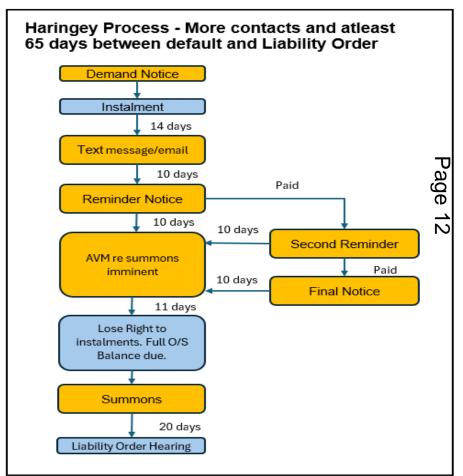
Additional measures to support residents introduced in the last year

- Improved council tax bills We have improved the layout of our bills to make them clearer and added additional information about support available for those in difficulty.
- Improved text messages We have upgraded to RCS (rich communication services) which gives the resident options, including an option titled 'need support', which allows the resident to visit our Council Tax reduction page, our Here to Help webpage and to download the SuperFi app, as well as payment and contact details.
- SuperFi Pilot We have entered a pilot with SuperFi which is a free debt prevention app available to all residents who receive our reminder messages. It can give users an overview of their finances, help them to manage and prioritise bills and credit commitments, and can support them to maximise their income via cancelling unnecessary subscriptions and using the Government Benefits Calculator. We are trialling it as part of a pilot funded by the GLA.
- Introduced further checks using "Pathway" this is an extra check using credit reference agency data to validate accuracy of name/address data, to identify those who are registered with the Vulnerability Registration Service, and/or in financial difficulty. Those showing as in financial hardship will receive an additional communication (letter/email) offering support and giving them more time to engage with us. In January we checked 1,117 cases using Pathway with 192 cases being identified as in financial difficulty, this represents 17% of cases checked.

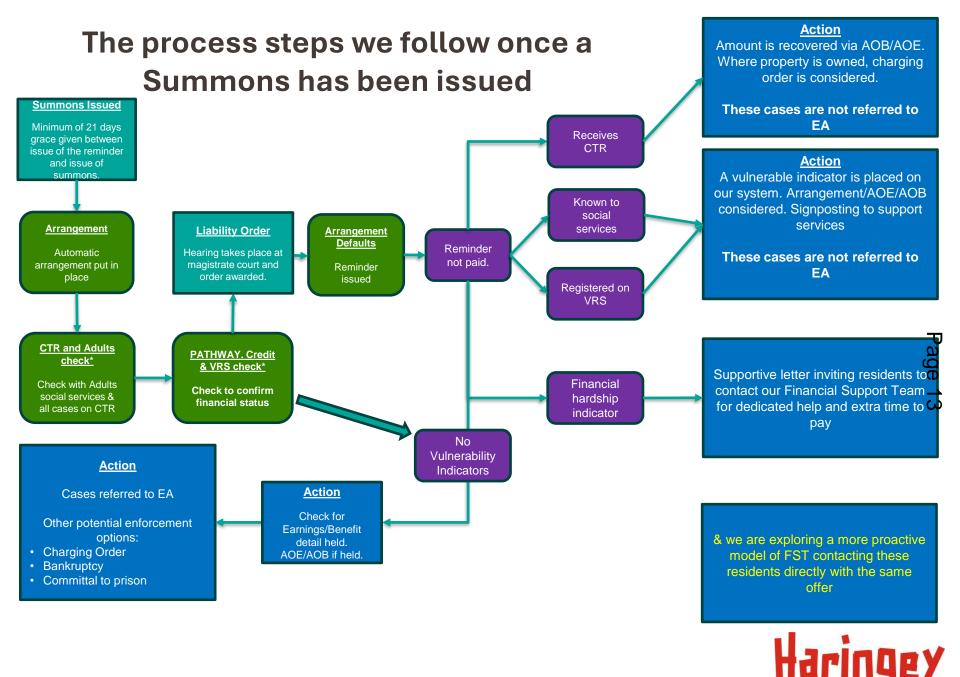
Haringey's process allows more than double the amount of time between payment default and Court Hearing than required by law

The Council Tax Regulations 1992 sets out the statutory process that billing authorities must follow for the billing and recovery of Council Tax. Our process has **additional** stages built in and allows more time at each









Financial Support Team impact

- FST is 5 officers who support residents with a wide range of financial challenges and in
 particular benefits maximisation, benefit applications, grants, issues with council tax and
 linking in with employment and training support. They are not qualified to offer debt advice
 but will signpost onto services who can
- The Financial Support Team (FST) operates a **phoneline** between 9.30 and 1pm Monday-Wednesday, and an email address. Staff can arrange to see residents in the community, or in their own homes, if they are vulnerable and housebound.
- Between August 2023 and February 2025, **2,842 residents were supported directly by the team** and these residents generated **9,150 support requests** showing the complexity of support needed with several interactions to resolve financial issues. 12% of the contacts FST have been regarding Council Tax.
- FST introduce residents to relevant parts of the organisation to access support if their team is not best placed this includes the Financial Inclusion Team in Housing (who have a housing specific remit), and VCS groups such as Disability Action Haringey, CAB, Haringey Advice Partnership and Step Change for debt.
- They support proactive benefits campaigns such as the recent pension credit campaign FST made direct contact with eligible residents to promote and support a claim



Other sources of Financial Support in the borough

Council Support Family	Haringey Support Family	National Support Family	
Financial Support Team Financial Inclusion Team Connected Communities Social Services	VCS organisations: CAB, Law Centre, Advice Partnership, Roj Women, Kurdish Advice Centre, Disability Action Haringey, St James's Legal Advice, Haringey Migrant Centre, Engage, Reach and Connect	Step Change CAB Universal Credit phoneline CAB Debt Line	
Family Hubs	Faith Groups	Turn2Us Scope	Page 15
	Housing Associations	MS Society	
		Shelter Gypsy and Travellers Unit	



Here to Help communications









Direct financial support given to low-income residents

The Council offers a wide range of support for vulnerable residents, and has provided more than £200m of support in 2024/25:

Type of Support	Description	24/25 spend to- date	Number of households supported
Housing Benefit	Support with rental costs for low-income households	£165m	12,347
Council Tax Support	Means-based support which reduces the Council Tax liability for low-income households	£34m	24,759
Household Support Fund	Provides: (i) Food vouchers for holidays for children receiving free school meals (ii) Cash vouchers to residents identified as being in financial stress (iii) Support to pensioners on Council Tax Support who didn't receive the Winter Fuel Payment	£4.02m	c.18,000



Direct financial support given to low-income residents (cont)

Type of Support	Description	24/25 spend to- date	Number of households supported
Discretionary Housing Payment (DHP)	Provides support to Housing Benefit & Universal Credit (housing element) recipients at risk of homelessness	£1.10m	632
Haringey Support Fund	Emergency fund to support residents with daily living needs or white goods	£378k	2,028
Clothing Grant	Provides support to low-income households with school uniform costs	£35k	319



Outside the Benefits function, there are other financial support administered to residents for specific purposes e.g. help with childcare costs



Income maximisation team impact

Impact of other income maximisation work

- 471 households supported by Welfare Team in 2024/25 to date
- £136,971 of backdated Benefits payments secured
- An estimated annual increase in income for these residents of £526,060, not including the payments above.

Pension Credit Campaign

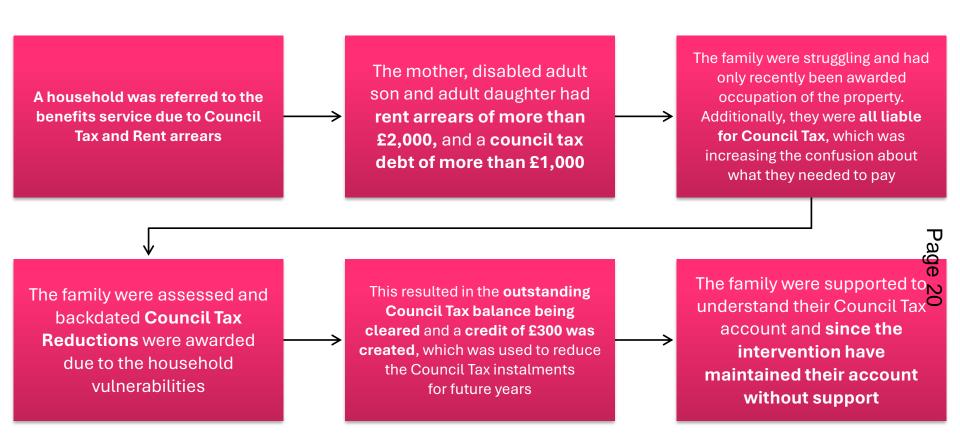
- Since October, the Team has supported 390 pension-age households to apply for Pension Credit.
- Additionally, holistic advice has been provided on a range of benefits and support which these residents may be entitled to.

Attendance Allowance Campaign

- The team is currently supporting Policy in Practice and the GLA to run an Attendance Allowance campaign.
- Income Maxmisation Officers are providing guidance and advice to residents on the process, and the information they need to provide. Vulnerable residents who cannot complete the form themselves are signposted to Citizens Advice for support.



Case study of helping a household get out of debt





Enforcement agents are only used when all other requests to pay have failed

- After at least 2 formal notices following a missed payment, plus emails and texts where data is held, and 45 days of non-payment, we issue a Summons to Court.
- The summons confirms action that may be taken if the debt remains unpaid i.e. attachments to benefits, attachment to earnings, referral to Enforcement Agents or charging order (see slide 6)
- We undertake **3 separate checks** for all cases which have had summons issued to confirm if we should exclude from EA referral (CTR, known to social services, and Pathway which includes VRS & financial hardship)
- We issue another **payment arrangement** to all residents at the point of summons issue. This arrangement is not a statutory requirement and is something we do to give our residents another opportunity to clear the amount in instalments. If the arrangement is paid as stated, no further action will be taken.
- If the resident **defaults** on their arrangement and they do not bring their arrangement up to date following another **reminder**, the case will progress to Enforcement stage.
- At the Enforcement stage and **prior to referring cases to Enforcement Agent**, we review whether attachments to Benefits or Earnings are possible and request these for DWP/Employer to enact, who apply collection values determined by legislation.

Enforcement agents are only used when all other requests to pay have failed

- Prior to any EA visit, there are at least 7 points of contact and 3 checks undertaken to try
 and identify vulnerabilities. A vulnerable case could slip through the net by exception, and
 it is never too late, we will step in and withdraw cases from Enforcement Agents where
 appropriate, and Enforcement Agents are required to immediately return cases where
 they've found the resident to be vulnerable.
- Without EAs, there would be £2,439,459 less funding for essential council services (23/24 collection value), and likely a much higher level of payment defaults in the absence of a deterrent.
- January 2025 data (as at 17/03/2025)

of Summons ued (12/2024)	No. of liability orders granted (16/01/2025)		No. of attachments to Benefits requested	No. of attachments to earnings requested	No. of referrals to EAs
1,464	1,156	192	83	28	426



Ensuring ethical behaviour by Enforcement Agents

We have just completed a procurement process in which we appointed three Enforcement Agent companies, putting in place a clear contract and service specification. These contracts are effective 21st April 2025.

The specification:

- requires body worn cameras to be worn on every visit. A clear audit trail must be always
 maintained providing a comprehensive history of all activities and outcomes at an individual
 case level from receipt of instruction through to its ultimate return
- requires a **dedicated welfare team**. This means that if a visiting Enforcement Agent were to identify a resident is potentially vulnerable, they would refer the case to their welfare team to follow up on the matter.
- clearly states that cases are to be returned **where vulnerability is identified**, including the resident being in receipt of benefits, ceasing all action immediately.
- if our officers have reviewed the case and considered that it's no longer appropriate for enforcement action to continue, the EA will be **requested to return the case** and take no further action (see slide 21).



Ensuring ethical behaviour by Enforcement Agents

Enforcement agents are paid via fees added onto the council tax arrears, and **these fees are set by legislation**.

Enforcement Agents only pursue cases where they identify a means to pay the debt via a payment plan or via the seizure and sale of goods.

Any bad practice from an enforcement agent will not be tolerated and we do investigate complaints thoroughly. This is made clear to all agents at the outset.

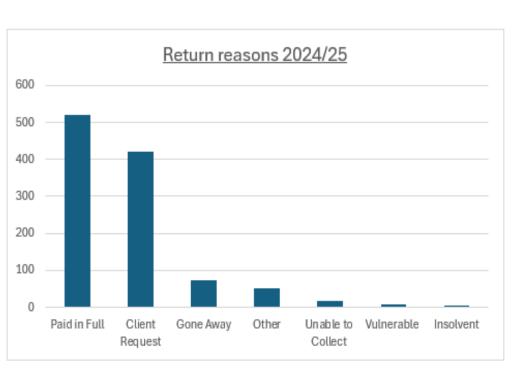
Since January 2024:

- 27 Complaints were received in respect of enforcement agent cases with only 4 relating to agent behaviour. In all 4 cases, body worn camera footage was reviewed by the recovery manager and Only 1 complaint about EA behaviour was escalated to no improper behaviour was witnessed.
- stage 2, and was not upheld

We have a dedicated client manager at each company and we meet with all Enforcement Agent companies to discuss performance against our specification during the contract. Meetings are scheduled with all companies in April prior to cases being referred under the new contracts.



EA referrals and numbers returned in 2024-25



Cases Retained

- 6,149 of the 7,246 cases referred in 24-25 up to 31st December remained with the EAs.
 - 194 of these cases are paying via an arrangement
- Q4 data will be ready in early April 2025, and the number retained will reduce to a much smaller number.
- Our new specification requires cases to be returned within 120 days where no payment is received. This will allow for case return and consideration of alternative recovery methods.

Referrals 1st April 2024 to 31st	7246
December 2024	

	Return reason	Paid in Full	Client Request	Gone Away	Other	Unable to Collect	Vulnerable	Insolvent
		520	421	74	52	18	7	5



Enforcement Agents practice across London

- In 2024 we asked other London boroughs to share with us some aspects of their approach to using EAs to see if there were opportunities to learn
- 16 boroughs responded on a confidential basis, using 23-24 data
- Haringey had 7th lowest number of referrals to EAs in 23-24 (8,942); in 24-25 the referrals to EAs have been 8,513 to date
- The difference between liability orders granted and referrals to EAs **residents removed** due to vulnerability checks, and attachments to earnings and benefits



Enforcement Agents practice across London

- 9 of the 16 borough policies were not as strong as Haringey's in terms of preventing EA referrals to low income and vulnerable groups
- **7 boroughs** had **similar protections** in place to Haringey they exclude CTR recipients and adult social care users, and or persons marked as "vulnerable"



Why we have rejected an inhouse Enforcement Agents model

- 1. **Cost** the cost of setting up and running an inhouse service whilst collecting the same income would exceed the amount that can be collected in fees from residents, whereas currently the service cost is covered in full by the fees that are capped by legislation. Commercial providers have economies of scale and geographic reach we can't match.
- 2. Council priorities our priority is to collect council tax and support residents experiencing financial hardship. Building an EA service inhouse would require us to generate enough fees to cover its costs conflicts with our priorities.
- 3. Performance & conduct we have had only 4 complaints about behaviour in 14 months and no complaints upheld after camera footage reviewed.
- **4. Added value** the new EA contracts are providing significant additional social value to the council:
 - Providing debt segmentation software prior to referral
 - Providing and/or funding training for the Revenues service including funding towards apprentices
 - Undertaking empty property inspections
 - Funding professional qualifications, professional memberships, conferences
 - Providing hardship funding.

