

Report for Cabinet

Title: The award of Enforcement Agency contracts for the Parking Service

Item number: 12

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Ward(s) affected: All

**Report for Key/
Non-Key Decision: Key Decision**

1. Describe the issue under consideration

- 1.1. This report seeks the approval of Cabinet to award contracts for the provision of Enforcement Agency Services to 6 providers for a period of 2 years without an option to extend.
- 1.2. Upon contract award four providers will actively deliver Enforcement Agency services in respect of Parking & Traffic debt, and two providers will act as reserves. Initial and subsequent allocation of work, and any movement between active and reserve status will be managed in accordance with the Enforcement Agency Specification & Code of Practice (appendix 1). This replaces the Council's current reliance on a single Enforcement Agency with a more resilient, performance-led model. Providers may be swapped from active to reserve and vice versa depending on performance against the key performance indicators set out in the Enforcement Agency Specification & Code of Practice (appendix 1), enabling the Council to respond to underperformance and maintain service continuity.
- 1.3. This report gives detail of the services provided and seeks approval from the Cabinet for the implementation of Contract Standing Order 9.07.1 d, which provides that all contracts valued at £500,000 (five hundred thousand pounds) or more at the time of award may only be awarded, assigned, or novated by the Cabinet.

2. Cabinet Member

- 2.1. We want to create a fairer, more equitable borough, protecting vulnerable residents and ensuring that any interaction between the council and our communities is guided by compassion and support. That commitment does not stop when a debt is owed.
- 2.2. This decision increases the number of parking enforcement providers from one to a panel of four, with two in reserve, bringing us in line with most other London boroughs.
- 2.3. Alongside this, we are introducing four new requirements for these providers: 1. metrics to address foreign vehicle debt, 2. metrics to help address vehicles that have no keeper registered with the DVLA, 3. a robust strategy to deal with persistent evaders, and 4. improved analytics and earlier intervention around vulnerability and hardship and increased social value.
- 2.4. This will enable us to curb the flagrant misuse of our roads, often by people who do not live in Haringey, while delivering increased support and protections for vulnerable people and wider community benefits.
- 2.5. Providers are now required to provide over £500,000 in community benefit and investment, around £70,000 in skills and training and over £20,000 in environmental commitments, alongside local employment, apprenticeships and work-experience opportunities.
- 2.6. And all of this will align with the council's Ethical Debt Reduction Policy, with vulnerability assessments embedded throughout the enforcement process and specialist welfare support available where concerns are identified.
- 2.7. I support these recommendations.

3. Recommendations

- 3.1. It is recommended that Cabinet pursuant to Contract Standing Order 7.02 (use of compliant Framework) and 2.01(c), approve the award of contract for provision of Enforcement Agency Services to six suppliers set out in the exempt appendix (Part B) (active and reserve) for a period of 2 years from 16 November 2026 to 15 November 2028 without an option to extend. The estimated aggregate contract value is £4 million over the two-year term, representing statutory enforcement fees anticipated to be recovered directly by the appointed providers from debtors, rather than expenditure payable by the Council.
- 3.2. Four bidders to become active from contract award and the remaining two bidders to be deemed reserves from contract award. Active suppliers may be moved to the reserve list and vice versa in accordance with the Enforcement Agency Specification & Code of Practice (appendix 1).
- 3.3. The number of PCNs registered at the Traffic Enforcement Centre (TEC) over the term of the contract are estimated to be 120,000. The cost of registering will be £11.00 per PCN, making a total of £1.32m. However, whilst some PCNs remain

unpaid, the overall costs are recovered by income raised from this contract (see 6.10) from the overall number of PCNs that are paid.

4. Reasons for decision

- 4.1. This report follows the successful completion of a further competition in accordance with the rules of the Yorkshire Purchasing Organisation (YPO) procurement Framework No.1200 Enforcement Agency Services. The framework is already in use for other debt types within Haringey and other Councils, including Council Tax, Business Rates and Business Improvement District (BID) Levy.
- 4.2. The Council has statutory duties in relation to the effective management of parking and moving traffic. Enforcement is necessary to improve compliance and effectively manage a limited amount of kerb space. The use of enforcement agents is always the last resort. The new multi-provider model is intended to strengthen service resilience, improve recovery performance through competition, provide clearer performance management and maintain safeguards for vulnerable residents and those in financial hardship.
- 4.3. Enforcement Agencies recover their statutory enforcement fees from debtors in accordance with legislation and do not charge the Council for the core enforcement activity. The Council does, however, incur the Traffic Enforcement Centre (TEC) registration fee for cases progressed to debt registration, currently £11 per PCN. Where recovery is successful, the registration fee forms part of the balance owed. The service model also includes pre-TEC activity intended to identify cases where escalation may be inappropriate or unlikely to result in recovery, helping to avoid unnecessary registration costs. The fees the Enforcement Agencies can charge in the recovery of the debt are determined by legislation (see 6.9).
- 4.4. The award will move the Council from reliance on a single Enforcement Agency to a competitive model comprising four active and two reserve providers. This will provide greater operational resilience and allow the Council to adjust allocations and active/reserve status in response to performance in accordance with the Enforcement Agency Specification & Code of Practice. This includes inbuilt checks to identify cases involving hardship and vulnerability that may require earlier intervention before the formal debt recovery process commences. The review of cases earlier on ensures the Council is not unnecessarily incurring a statutory court fee and ensuring value for money.

5. Alternative Options Considered

- 5.1. **Do nothing:** Continuing with the current single Enforcement Agency arrangement would retain dependency on one provider, reduce the Council's ability to use competition to drive recovery performance and provide less resilience where performance or service issues arise. It would also prevent implementation of the enhanced performance, vulnerability and service safeguards contained within the new Enforcement Agency Specification & Code of Practice.

- 5.2. **Cease using Enforcement Agencies:** Ceasing to use Enforcement Agents altogether would significantly impact the collection of legitimate debt and overall income; parking income is ring-fenced, and Section 55 of the Road Traffic Regulation Act 1984 outlines how any parking surplus may be allocated. In summary, a parking surplus can be spent on the provision of off-street parking, funding public transport services (e.g. concessionary travel) and covering the authority's costs for maintaining publicly funded roads. This option would materially weaken the Council's ability to recover unpaid debt after the statutory notice and appeal processes have been exhausted.
- 5.3. **Insource the service:** Unlike Civil Enforcement Services that utilise Civil Enforcement Officers (CEOs) often employed directly by Councils (as in Haringey) or through contractors, parking debt enforcement is typically outsourced to certificated enforcement firms. Most, if not all, London authorities outsource warrant enforcement to specialist enforcement companies such as those listed above and for good reasons; operating an inhouse enforcement service would require the Council to develop a specialism that it does not currently have, and would require significant upfront investment into infrastructure, recruitment and training. The Council considers that outsourcing through the compliant framework provides a more proportionate and resilient approach.

6. Background Information

Enforcement of Road Traffic Debts

- 6.1. The Council can lawfully refer parking debts to an external enforcement company by way of and under the authority of the Traffic Management Act 2004, the Enforcement of Road Traffic Debts Order 1993, and CPR Part 75, with enforcement carried out under the Tribunals, Courts and Enforcement Act 2007 (once the warrant is issued, enforcement agents act under the enforcement powers and procedures contained in Schedule 12).
- 6.2. The progression and recovery of unpaid PCNs is strictly governed by a statutory process. Once the relevant statutory stages have been completed, the Council may obtain a Warrant of Control and refer the debt to an Enforcement Agency for recovery.

Civil Procedure Rules Part 75 (Traffic Enforcement)

- 6.3. CPR Part 75 governs, the registration of the debt at TEC, Orders for Recovery, Issue of a local authority Warrant of Control and the transfer to enforcement agents.
- 6.4. In 2024/25 the Council issued 404,891 parking and traffic PCNs generating circa £20m in income, of which circa £2m was collected by the existing sole Enforcement Agency, CDER Group.
- 6.5. The use of Enforcement Agencies is considered an essential part of any parking debt recovery process. Debtors are notified of unpaid amounts on several

occasions before being referred to enforcement agents. The statutory process includes a representations and formal appeals stage (appeals are considered independently of the Council). In the event of an unsuccessful appeal or in the absence of any appeal at all, the debt must always firstly be registered with the Traffic Enforcement Centre (TEC). Cases may not be sent to enforcement agents for collection unless these actions have been taken. There is a TEC registration fee of £11.00 for each PCN the Council wishes to register. The quantity of PCNs registered as warrants (and associated debt values) from 2022/23 to 2025/26 was as follows:

Table 1 (number of warrants sent to the incumbent provider since 2022):

Year	Number of warrants referred	Debt Value
2022/23	45,209	£8.9m
2023/24	87,754	£17.6m
2024/25	50,691	£10.2M
2025/26	68,376	£14.5m

- 6.6. Enforcement Agents may find it more challenging where individuals are heavily in debt and have multiple warrants outstanding. Therefore, existing recovery is in a broad range of 18% -25% by number of warrants paid. Through the steps and measures outlined a key objective is to improve recovery to 25% and over, whilst maintaining suitable safeguards and help to those who need it. The collection rate(s) may seem low, but a recovery of 25% would be high given the significant challenges in collecting this type of debt. In the lead up to making improvements around recovery and in order to implement other service improvements, post contract award the Council will commence a detailed mobilisation period to complete system integration, testing, operational readiness and the phased onboarding of additional providers.

Fees and charges

- 6.7. External Enforcement Agents collect fees from debtors and there is no cost to the Council. However, there is a TEC registration fee of £11.00 per PCN which is paid for by the Council. The registration fee is added to the PCN debt and recovered as part of the balance owed, if the warrant is successfully executed.
- 6.8. The Enforcement Agency Specification & Code of Practice includes a pre-TEC assessment stage designed to improve the quality of cases progressed to debt registration. Providers will undertake prescribed checks to support decisions on recoverability before the Council incurs the TEC registration fee. This is intended to reduce unnecessary escalation, improve customer outcomes and support value for money.
- 6.9. The process by which debts are collected by Enforcement agents is split into three parts and is governed by legislation, namely The Taking Control of Goods Regulations 2013, The Taking Control of Goods (Fees) Regulations 2014, The Taking Control of Goods (Miscellaneous Amendments) Regulations 2026 and The Certification of Enforcement Agents Regulations 2014 (including any

amendments). The table below shows the stages of the process and the statutory fees which are governed by legislation and cannot be amended.

Table 2 (statutory fees all providers must adhere to):

Stage of process	Action	Fixed Fee	% fee (over £1900.00 only)
Compliance	Debtor contacted by phone, letter, email, text	£79.00	0%
Enforcement	Visit to home of business, taking control of goods.	£247.00	7.5%
Sale	Removing and sale of goods	£116.00	7.5%

- 6.10. The table below lists the income raised from warrants issued by the Council to CDER, together with the statutory fees collected by them between 2022 to 2026 and total TEC registration costs for the year(s) in question.

Table 3 (TEC registration costs, warrant income and statutory fees charged collected (retained by CDER) since 2022). Registration fees include PCNs that were registered and paid pre-warrant.

Year	Number of warrants issued	Total TEC registration costs*	Income raised from warrants and received by Council	CDER Statutory Fees collected (retained by provider)
2022/23	45,209	£648,891	£1.4m	£1.4m
2023/24	87,754	£760,194	£1.8m	£2.1m
2024/25	50,691	£527,696	£1.9m	£2.1m
2025/26	68,376	£680,890	£2.4m	£2.3m

*Note: TEC registration costs reflect the applicable statutory fee in each financial year (£9 in 2022/23–2023/24 and £10 in 2024/25–2025/26). The current TEC registration fee is £11 per PCN.

- 6.11. The estimated contract value over the two-year term is approximately £4 million, representing the statutory enforcement fees (see table 2 fixed statutory fees all providers) anticipated to be collected by the appointed Enforcement Agents. These fees are recovered directly from debtors in accordance with the statutory fee framework. The Council does not pay the Enforcement Agents for their core enforcement services, apart from the separate costs of £11 per PCN associated with registering debts at the Traffic Enforcement Centre (TEC).

- 6.12. Procurement Process

- 6.12.1 A further competition was conducted amongst all suppliers appointed to the YPO Framework 1200 Enforcement Agency Services Framework. Twenty-six framework suppliers were invited to participate, and nine compliant tenders were received by the closing date.
- 6.12.2 The submitted responses were evaluated independently by three appointed evaluators against the published evaluation criteria and methodology. Following the initial evaluation, a moderation exercise was undertaken to review and agree the evaluator's scores and ensure a consistent and robust approach to the evaluation process. The final moderated scores were used to establish the overall ranking of the providers (see Table 4 below).
- 6.12.3 The procurement methodology originally provided for three providers to be appointed as active providers, with a further three providers identified as reserve providers. The remaining providers would be unsuccessful.
- 6.12.4 Following completion of the evaluation and moderation process, six providers were identified for consideration for appointment. However, a tie occurred between the providers ranked third and fourth. The published procurement methodology did not include a specific tie-break mechanism to determine which provider should occupy the third active position. As a result, the evaluation outcome did not produce a clear top three providers in accordance with the originally proposed allocation of three active providers and three reserve providers. The council therefore considered the need to apply a fair, transparent and non-discretionary approach to address the tie, whilst maintaining the integrity of the published evaluation methodology and ensuring that no provider was unfairly advantaged or disadvantaged.
- 6.12.5 The council proposed an alternative arrangement whereby four providers would be designated as active providers and two providers would be designated as reserve providers. This approach would allow the Council to address the tie without retrospectively introducing an unpublished tie-break criterion that could materially affect the outcome of the competition.
- 6.12.6 Procurement sought legal advice on the proposed approach. Legal advised that there was a reasonable basis for the Council to proceed with the proposed arrangement of four active providers and two reserve providers. The proposed arrangement and the rationale for addressing the tie are set out in this report for approval.
- 6.12.7 The final moderated scores are set out in the exempt Part B report along with names of the successful bidders (both active and reserve) and are summarised in Table 4 below. The procurement evaluation comprised Method Statement and Social Value and was weighted 100%. The overall scores below are the weighted scores derived from the six published questions; no separate price score was applied.

Table 4 Final moderated scores

Bidder	Q1 Maximising Collection	Q2 Vulnerability	Q3 Innovation	Q4 Resources	Q5 Additional Services	Q6 Social Value	Overall
Weighting	20%	20%	20%	10%	20%	10%	100%
Maximum Score	5	5	5	5	5	5	
Bidder 1	20%	20%	16%	10%	20%	8%	94%
Bidder 2	20%	16%	20%	8%	20%	10%	94%
Bidder 3	20%	20%	16%	8%	20%	8%	92%
Bidder 4	16%	16%	16%	8%	16%	8%	80%
Bidder 5	20%	20%	12%	8%	16%	0%	76%
Bidder 6	16%	16%	16%	4%	8%	8%	68%
Bidder 7	16%	20%	16%	10%	20%	10%	92%
Bidder 8	16%	16%	12%	8%	16%	6%	74%
Bidder 9	16%	16%	12%	6%	16%	8%	74%

6.13. Contract Management Arrangements

6.13.1 Upon contract award the number of providers will increase to six, comprising four active and two reserve. This structure is intended to provide resilience and create a competitive, performance-led environment. Initial and subsequent allocation of work, and any movement between active and reserve status will be managed in accordance with the Enforcement Agency Specification & Code of Practice (appendix 1).

6.13.2 Provider performance will be monitored against the contractual KPIs and wider performance requirements set out in the Enforcement Agency Specification & Code of Practice, including complaints and service quality. Allocation may be adjusted in accordance with those provisions to incentivise successful recovery, maintain service standards and minimise upheld complaints. Where performance concerns arise, the Council may require rectification action and, where the contractual thresholds are met, change a provider's active or reserve status.

6.13.3 Warrants expire after 12 months but may be returned at the request of the Council at any point during this period by way of agreed return reason codes. This may result in the Council deciding to stop enforcement of the warrant altogether or to reallocate the warrant to another one of the active providers in line with the Enforcement Agency Specification & Code of Practice.

6.13.4 The contracts will be subject to regular performance monitoring in accordance with the Enforcement Agency Specification & Code of Practice. This will include

review of KPIs, recovery performance, complaints, service quality and compliance (see table 5 below). Where performance falls below the required standard, the Council may require a rectification plan and apply the performance remedies provided for in the contract, including changes to allocation and active/reserve status where appropriate.

Key risks and mitigations

- 6.14. Principal risks include provider underperformance, inappropriate enforcement against vulnerable residents, complaints and reputational impacts, mobilisation or systems/data integration issues, information security and recovery performance below expectations. These risks will be mitigated through the multi-provider structure, contractual KPIs and remedies, vulnerability and complaints requirements, audit trails and ongoing contract management.

Table 5 (Enforcement Agent Key Performance Indicators (KPIs)):

KPI	Measure
KPI 1	% recovery by number of fully paid Recovery Orders vs total number of Recovery Orders issued to date across all batches.
KPI 2	% recovery by number of fully paid and partially paid Recovery Orders where an instalment plan is active across all batches.
KPI 3	% of warrant alerts attended within 1 hour, with and without a positive outcome (payment, clamping and/or removal).
KPI 4	% of statutory Notices of Enforcement (NOE) issued by day 2.
KPI 5	% of reminders issued by day 7.
KPI 6	% of enforcement visits carried out between days 14–21 following receipt of the Recovery Order and % compliance with the Service Provider's own enforcement plan submitted as part of the tender.
KPI 7	% of planned visits aborted due to the absence of video and/or recording devices.
KPI 8	% of requested responses provided to the Contracting Authority within 48 hours.
KPI 9	% ANPR deployed hours vs agreed deployment plan.

Consultation:

7. **Statutory Officers' comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)**

Finance:

- 7.1. This report seeks Cabinet approval to award contracts for the provision of Enforcement Agency Services to the successful bidders for a period of two years. The contracts will not include any extension options.
- 7.2. The new contract model moves the Council away from reliance on a single provider and introduces a competitive multi-provider arrangement. This approach will provide greater operational resilience, stronger performance management, and the flexibility to adjust work allocation in response to provider performance.
- 7.3. External Enforcement Agents recover their fees directly from debtors and therefore do not generate a cost to the Council. However, when Penalty Charge Notices (PCNs) are progressed to debt registration, the Council is required to pay a Traffic Enforcement Centre (TEC) registration fee of £11.00 per PCN. In order to minimise the number of these TEC fees that are ultimately non-recoverable, the new recommended contract requires providers to undertake prescribed checks to support decisions on recoverability before the Council incurs the TEC registration fee. This is intended to reduce unnecessary escalation, improve customer outcomes and support value for money. This fee is added to the outstanding debt and is recoverable from the debtor where the warrant is successfully executed.
- 7.4. The estimated contract value of £4m represents statutory enforcement fees recoverable by the Enforcement Agent directly from debtors and therefore does not constitute expenditure by the Council. The Council's financial liability is limited to the costs associated with registering debts at the Traffic Enforcement Centre (TEC). As such, there is no significant revenue budget implication arising from the appointment of the Enforcement Agent beyond the TEC registration costs.
- 7.5. There are no significant additional revenue budget implications arising from the award of the contracts beyond the ongoing TEC registration costs, which will continue to be managed within existing service budgets. The Council's financial exposure is therefore limited and proportionate to the statutory debt recovery process.

8. Procurement

- 8.1. The proposed arrangement is a concession-like service model whereby the successful providers recover their statutory enforcement fees directly from debtors in accordance with the relevant legislation. The Council's principal financial exposure relates to Traffic Enforcement Centre (TEC) registration fees and associated contract management activities.
- 8.2. The procurement was undertaken through a further competition under the Yorkshire Purchasing Organisation (YPO) Framework 1200 Enforcement Agency Services, a framework established in accordance with the Public Contracts Regulations 2015. The use of this framework provided an efficient, compliant and proportionate route to market, enabling the Council to access a pre-qualified pool of suitably experienced and accredited enforcement providers.
- 8.3. Following completion of the evaluation process, six providers were identified as capable of delivering the Council's requirements. The procurement strategy proposes the appointment of four active providers and two reserve providers. This approach will increase operational resilience, reduce dependency on a single supplier and create a competitive delivery environment in which performance can be continuously monitored and managed.

- 8.4. The active and reserve structure provides the Council with flexibility to respond to performance issues, service failures or changes in operational demand. Providers may be moved between active and reserve status in accordance with the contractual arrangements and performance management framework, thereby promoting continuous improvement and safeguarding service continuity.
- 8.5. Contract performance will be actively managed throughout the contract term through the Enforcement Agency Specification & Code of Practice, key performance indicators and governance arrangements set out elsewhere in this report. This will enable the Council to monitor recovery performance, complaint levels, compliance with vulnerability requirements and delivery of social value commitments.
- 8.6. In accordance with Contract Standing Order 7.02, the Council may access framework agreements established by external public purchasing organisations. Cabinet has authority under Contract Standing Order 2.01(c) to approve the contract awards recommended within this report.

9. Legal:

- 9.1. The Director of Legal and Governance (Monitoring Officer) was consulted in the preparation of the report.
- 9.2. The report indicates and Strategic Procurement has confirmed that the contract in the report was procured via the Yorkshire Purchasing Organisation (YPO) Framework 1200 Enforcement Agency Services and this is a compliant route to procure such a contract in line with the provisions of the Council's Contract Standing Order (CSO) 7.02 and Regulation 33 of the Public Contracts Regulations 2015.
- 9.3. Pursuant to the provisions of the Council's CSO 2.01(c), Cabinet may approve the award of a contract where the value of the contract is £500,000 or more and as such the recommendation in paragraph 3.1 of the report is in line with the Council's CSO.
- 9.4. The Director of Legal and Governance (Monitoring Officer) see no legal reasons preventing the approval of the recommendation in the report.

10. Equality:

- 10.1. The council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:
 - Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
 - Advance equality of opportunity between people who share protected characteristics and people who do not.
 - Foster good relations between people who share those characteristics and people who do not.

- 10.2. In order to achieve the above, the Enforcement Agency Specification & Code of Practice sets out the Council's requirements around vulnerability and that providers are required to provide support where required. This requirement was formally included in the invitation to tender and formal tender evaluation. Similarly, providers were required to make contractually binding commitments around Social Value including the undertakings referred to in section 2.1 of this report e.g. residents experiencing financial hardship will benefit from the establishment of a hardship fund providing direct support to vulnerable households and improving overall financial resilience amongst residents.
- 10.3. The Council's invitation to tender asked providers to describe the social value commitments their respective organisations would deliver throughout the contract period and asked providers to explain how those commitments would be delivered, measured, monitored and evidenced. This included considerations on how commitments would affect persons with protected characteristics. If the recommendations in this report are accepted, providers already working with the Council's revenues team will continue to work closely with local stakeholders, charities, community groups and Council officers to create employment opportunities, support vulnerable residents, invest in community safety initiatives and contribute to environmental projects that make a real difference locally. New providers will be expected to work in partnership with the Council towards achieving community benefits and investment.
- 10.4. Regular evaluation against KPIs (table 5), is intended to improve experience for all residents, regardless of protected characteristics. Providers are expected to align all Social Value commitments to the National TOMs (Themes, Outcomes and Measures) Framework, assigning measurable targets, collecting supporting evidence and reporting outcomes through recognised indicators to ensure transparency, accountability and maximum community impact. This enables the providers and Council to monitor, measure and evidence the social value being delivered throughout the contract term and compare and map this data back to opportunities afforded to people who share protected characteristics and people who do not.
- 10.5. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 10.6. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.
- 10.7. Section 17 of Enforcement Agency Specification & Code of Practice (Appendix 1) requires all successful bidders to operate in compliance with the Equality Act 2010 and the Public Sector Equality Duty and associated statutory codes of practice.
- 10.8. The information supplied to Enforcement Agents, as part of the enforcement process, does not identify protected characteristics under the Equality Act 2010 nor socioeconomic status. This is intended to limit discrimination.
- 10.9. Body worn video and audio recording equipment must be worn by Enforcement Agents carrying out visits and must be worn on every visit. A clear audit trail must be maintained at all times providing a comprehensive history of all activities and outcomes at an individual case level from receipt of instruction through to its ultimate return. Body worn video has proven and considerable benefits in the

resolution of disputes, complaints and allegations around behaviour of enforcement agents. The Council requires providers to be considerate in the use of body worn video and given the safeguards and audit around recording does not expect any significant drawbacks around protected characteristics.

10.10. Section 12 of the Enforcement Agency Specification & Code of Practice sets out the Council's requirements with respect to how complaints are handled. If the complaint relates to an Enforcement Agent and the complaint is upheld, the Council may request that the Enforcement Agent is removed from the contract and further action may be taken by the Council against the service provider. This provides an additional layer of protection and empowerment against discrimination and harassment from Enforcement Agents against persons with protected characteristics.

10.11. Section 16 of the Enforcement Agency Specification & Code of Practice sets out the Council's requirements with respect to how vulnerable residents are identified and protected. This includes identification and additional protection of those with certain protected characteristics, namely age, disability, pregnancy/maternity and socioeconomic status. Upon making contact for the first time, the Enforcement Agent must endeavour to establish whether the debtor or their partner falls into any of the following categories:

- a) Ongoing mental illness/severe depression
- b) Allegations of attempted suicide
- c) Long standing health condition
- d) Learning disability
- e) Terminally ill
- f) Recent bereavement
- g) Elderly – where it is clear the person is unable to deal with payment or their affairs
- h) People with severe disabilities (physically or mentally)
- i) Where the debtor or partner is in the final weeks of pregnancy (to be reviewed after the birth of the child)
- j) Where severe social deprivation is evident
- k) Communication difficulties where an advisor or an interpreter would be helpful (profound deafness, blindness or language difficulties)

To meet this requirement, and ensure adequate treatment, the Council requires all agents to be suitably trained and for providers to confirm this prior to deploying any enforcement agent to undertake work on the contract.

10.12. In these recommendations, including the increased powers to evaluate Enforcement Agents' performance, the Council foresees a benefit of decreased harassment and discrimination against all residents, with particular benefit to those with the following protected characteristics: age, disability, pregnancy/maternity and socioeconomic status.

10.13. In making this decision to accept the report recommendations, the Council do not anticipate any negative equalities impact. However, during the course of the contract, should there be any negative impacts identified, the Council shall put mitigations in place to tackle them.

10.14. Corporate Policy and Equality Impact - An Equality Impact Assessment (EIA) Screening Tool was completed which confirmed that a full EIA was not required.

11.0 Use of Appendices

Appendix 1 – Enforcement Agency Specification & Code of Practice

Exempt Appendix 2 – Part B report

Local Government (Access to Information) Act 1985

This report contains exempt and non-exempt information. The exempt information is contained in the Part B Exempt Report and is not for publication. The information is exempt under amended schedule 12A of the Local Government Act 1972, category 3, as it relates to the financial or business affairs of particular persons, including the authority holding that information.