

# **Debt Management & Collection Policy**

“Promoting rights, responsibilities, fairness, consistency and proportionality.”

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## 1. Introduction

Haringey Council has a legal and fiduciary duty to all residents, and to businesses and other organisations that are active in the Borough, to ensure the prompt and cost effective billing, collection and recovery of all sums due to the Council. Delays in collection or non-recovery of debts can lead to higher administrative costs, increased borrowing requirement and reduced resources available for the provision of essential services.

The Council has developed this Fair Debt Collection Policy to promote its aims to be fair and consistent but also firm in the collection of monies owing.

## 2. Overview

### 2.1 Policy Intention

The intention of the Council in agreeing this Policy is to achieve the prompt collection of all sums of money it is due, whilst ensuring that a fair, proportionate and consistent approach is taken to the recovery of sums that are not paid when due. The prompt collection of monies due is essential to providing the financial resources needed by the Council to provide services to the benefit of local residents, businesses and other organisations.

### 2.2 Scope of the Policy

This Policy relates specifically to the collection of the forms of revenue shown below;

- Council Tax
- Non-Domestic Rates (Business Rates)
- Housing Benefit Overpayments
- Parking
- Housing Rent – Current Tenant
- Housing Rent – Former Tenant
- Hostel & Temporary Accommodation
- SAP Sundry Debts including:
  - Sundry Debt administered by the Council's Finance Corporate Debt Management Team
  - Leasehold Debt, managed by HFH Home Ownership Team
  - Adult Social Care Debt,

The Policy may be extended to include other forms of revenue collected by the Council.

### 2.3 Commencement and Duration

This Policy shall take effect from **September 2014**.

The Policy will have continuous effect but shall be reviewed from time to time, as required, to ensure that it continues to encourage best practice in the field of local authority revenue collection and meets current legislative requirements.

A review of the Policy shall be conducted at least once every five years.

## 2.3 Definitions

The following definitions apply for the purpose of this Policy in respect of the terms shown below.

**Arrears** - for the purposes of this policy the term 'arrears' is used to refer to a sum that is due to be paid to the Council, has not been paid and the date on which payment was due has passed.

**Debt** - for the purposes of this policy the term 'debt' is used to refer to an amount that is payable to the Council.

**Debtor** – for the purposes of this policy the term 'debtor' is used to refer to a person, persons, organisation or other legal entity that owes a sum of money to the Council. The term is used for convenience and is not intended to be pejorative.

**Severe Remedy** - for the purposes of this policy the term 'severe remedy' refers to an application to;

- Have the debtor declared bankrupt or other forms of insolvency.
- Register a charge against a property or apply for the sale of a property against which a charge is registered.
- **Apply for the debtor to be committed to prison.**

**Vulnerable Person** – for the purposes of this policy the term 'vulnerable person' refers to a person who has exceptional difficulty dealing with the payment of a bill because of their personal circumstances and who requires additional assistance in dealing with the bill in order to meet their financial obligation. Further explanation is provided under section 4.4 of this Policy.

## 3. Effective Revenue Collection

### 3.1 Good Practice in Revenue Collection

The Council aspires to achieve good practice in revenue collection. Good practice is considered to be achieving the best possible cash flow for the Council whilst ensuring that the liability to pay is calculated correctly, enforcement action is reasonable and those who are vulnerable are assisted in meeting their financial obligation to the Council.

To achieve good practice the Council will follow the principles shown below;

- Issue requests for payment promptly and accurately.
- Provide clear bills and recovery notices which show clearly what to pay, when to pay it and how to pay.
- Respond quickly to notifications of changes in circumstances and applications for exemptions, discounts and reliefs.
- Deliver benefit entitlements promptly and accurately.
- Commence action to recover unpaid amounts promptly to avoid the build up of arrears.

- Make it as easy as possible to pay bills by offering a wide choice of convenient payment options.
- Ensure that all debt recovery documents are clear and informative, detailing deadlines for repayment, the consequences of not paying and where possible the payment options available.
- Provide information about discounts, reliefs, reductions, exemptions and benefit and encourage the take-up of entitlement.
- Make it easy to contact the Council through a range of options including face to face, by telephone, by e-mail or in writing.
- Respond to all enquiries promptly and courteously.
- Signpost to sources of independent money and debt advice.
- Be proactive in identifying vulnerable persons and in providing them with advice to assist them in meeting their financial obligation to the Council.
- Wherever possible use the least severe method of recovering a debt (subject to the method realising payment in a suitable period of time).
- Instigate legal proceedings promptly where sums due are not paid.
- Recover the full cost of enforcement action from the debtor, but avoid imposing unnecessary or excessive charges.
- Respect the debtor's privacy by conducting enforcement activity as discretely as possible.

It is acknowledged that the easier it is to make a payment, then the more likely it is that payment will be made promptly. Therefore, a choice of convenient methods will be offered for payment of bills and invoices and details of these options will be provided with requests for payment.

Whatever the method of payment chosen it is the responsibility of the person making the payment to ensure that payments made reach the Council by the date they are due. The date payment is due will be shown on each request for payment.

Those having difficulty in paying will be actively encouraged to contact the Council as early as possible. Where a debtor contacts the Council because they are experiencing difficulty in making payment the following actions will be taken.

- Check whether the bill should be less or nothing at all by ensuring that all the relevant benefits, discounts, reliefs, exemptions and rebates are being claimed.
- Provide advice on the most appropriate payment methods.
- Consider agreeing a payment arrangement (see separate heading below).
- Provide advice regarding the next course of action that will be taken if payment is not made as required.
- Where appropriate advise them to contact an independent advice agency.

## **3.2 Making it Easy to Pay**

The Council recognises the need to make it as easy as possible for its customers to pay their bills. In order to reduce the cost to the Council and, therefore, local taxpayers the most cost effective methods of payment will be encouraged.

For most bills this will be Direct Debit because it is, by far, the most economical collection method available. It is also very reliable, easy to set up and cancel, and is backed by a refund guarantee. It is also the cheapest and most convenient method of payment for the customer.

Where Direct Debit is not available the preferred payment method will be on-line by debit or credit card. The range of payment methods offered is;

- **Direct Debit**

Direct Debit is the Council's preferred method of payment and is offered for payment of Council Tax, Non Domestic Rate, Housing Rent and Sundry Debts including Leasehold service charges.

For Direct Debit, services will offer a choice of payment dates and frequencies.

- **On-Line via the Council's Website**

Council Tax, Non Domestic Rates, Housing Benefit Overpayments, Commercial Rent and Sundry Debt invoices and reminders can be paid through the Council's website [www.haringey.gov.uk](http://www.haringey.gov.uk) and may be paid using either debit or credit card.

A service charge calculated as a percentage of the amount paid may be made where a credit card is used for payment. The full amount collected in service charges will be used to meet the charge made to the Council by its card payment service provider. The service charge made may vary in the event that the charge incurred by the Council changes.

- **24 hour Automated Telephone payment line (ATP)**

Payments for Council Tax, Parking Penalty Charge Notices, Housing Rent, Business Rates, Housing Benefit Overpayment, Commercial Rents and Sundry Debt invoices and reminders may be paid by debit or credit card by calling the Automated Telephone Payments Service on 0845 070 1414.

A service charge may be made where a credit card is used for payment as detailed above.

- **Post Offices and Paypoint Outlets**

You can make payments at a large number of PayPoint outlets for Council Tax, Housing Rent and Haringey Invoices using your allpay Payment Card (Rent), or using the barcode on the invoice (Council Tax and Haringey Invoice).

- **Bank Transfer / BACS / Standing Order**

Payment of Council Tax, Non Domestic Rates, Housing Benefit Overpayments, Sundry Debts and Commercial Rent may be made directly to the Council's bank account, details of which are provided with requests for payment.

### **3.3 Responsibilities of Debtors**

The Council expects any person or organisation that owes a sum of money to the Council, or should have a liability to pay, to comply with any and all legal obligations in respect of the liability or potential liability. The Council's commitments to a fair debt collection process are set out in this Policy and it is the Council's expectations that those owing sums to the Council will contribute to this process by abiding with the following principles;

- Pay amounts due promptly to ensure receipt by the Council on or before the date that payment is due.

- Follow instructions provided regarding the making of payments to ensure payments are credited correctly against the amount due.
- Inform the Council promptly of any changes to their circumstances that may affect the amount to be paid or the ability to pay.
- Notify the Council promptly if their address changes.
- Contact the Council promptly if it is believed the amount charged is not correct, both where the amount may be too much or too little.
- Contact the Council promptly if they are unable to pay an amount that is due.
- Respect the Council, its employees and its agents and respond to them courteously.
- Be frank and honest when providing information in connection with the billing, collection or recovery of sums due to the Council.

### **3.4 Arrangements for Repayment of Arrears**

It is the Council's expectation that all bills should be paid promptly as due. However, it is recognised that occasionally a debtor will experience genuine difficulty in making a payment when it is due.

Anyone experiencing such difficulty is encouraged to contact the Council at the earliest opportunity to discuss repayment options. Where contact is made consideration will be given to entering into an individual repayment arrangement based on the debtor's personal circumstances. The Council's staff will seek to obtain as much information as possible about the debtor's circumstances, as considered necessary in order to make the best assessment of their ability to pay and to determine a realistic payment arrangement. More detailed information is likely to be required where the debtor claims to be unable to pay the debt over a short space of time and where the debt will not be repaid in full by the end of the financial year.

Where a debtor refuses to divulge any information that is considered essential to assessing their ability to pay then no payment agreement will be entered into.

When undertaking a detailed assessment of a person's financial situation and evaluating their ability to pay an income and expenditure form replicating the form used by the Citizen Advice Bureau will be used. Expenditure declared will be measured against the Bureau's common financial statement. This will ensure a consistent approach is taken to assessing a person's financial circumstances using a widely recognised methodology.

In accordance with recognised good debt management practice the Council will expect the debtor to undertake to pay priority debts in preference to other debts. Priority debts are those debts that can result in loss of an essential service, loss of a person's home or imprisonment such as;

- Mortgage or Rent
- Council Tax
- Electricity
- Gas
- Telephone
- Water
- Secured Loan
- Child Support Agency deductions.
- Maintenance Arrears
- Income Tax
- VAT

- Court Fine

The principles that will be followed in determining repayment arrangements are;

- The Council will seek repayment of all outstanding arrears as soon as possible. Guidelines are as follows:
  - No more than 6 payments where repayment by instalment is agreed.
  - Amounts under £250, payment in full.
- Payment arrangements extending beyond guidelines should only be made in exceptional circumstances following a detailed assessment of the debtor's ability to pay.
- The Council's preferred method of repayment for any arrangement is Direct Debit.
- Repayment should commence promptly and the first payment of any payment arrangement should normally be payable within no more than one month of the agreement being reached.
- Where liability is ongoing any arrangement will require payments to be over and above the on-going monthly liability, except in the most exceptional circumstances (for example where a debtor's financial circumstances are expected to improve in the near future).
- Where a payment arrangement is accepted at less than the rate at which liability is accruing, the arrangement should be for a maximum of three months but may be extended further following review, but on each occasion shall not be extended for more than three months.
- Payment of current year debts should be given priority except where this would conflict with arrangements already in place for previous years' debts.
- Payment arrangements should not normally be for less than could be obtained by attachment of earnings or deductions from benefits unless there are extenuating circumstances.
- Payment arrangements in respect of local taxes should be made on the basis that the Council will progress enforcement action to the point of obtaining a liability order from the Magistrates' Court.
- Payment arrangements should be refused where it is considered that entering into an arrangement may jeopardise the likelihood of the Council recovering payment in full (e.g. if there is a risk the debtor will be declared insolvent).
- Payment arrangements may be refused where the debtor appears to have sufficient assets which could be realised to pay the debt but the debtor is unwilling to take steps to realise the assets.

It is recognised that debtors may occasionally make unrealistic offers of payment that they cannot afford. Where the Council has reason to believe that an offer of repayment is unrealistic, for example a person is known to be on a low income but offers to make substantial payment, further information will be sought in order to agree an affordable rate of repayment.

Payment arrangements will normally be confirmed in writing so that the debtor is aware of the amount and frequency of their payments.

The responsibility for making sure that payment reaches the account by the due date remains with the debtor. This means that debtors must allow sufficient time for the payment to reach the Council by the due date.

The Council reserves the right to refuse to accept offers to repayment.

Where a payment arrangement has been agreed but payment is not received strictly in accordance with the agreement, action to enforce payment will be recommenced promptly following the default in payment. Where a debtor has failed to make payments as agreed further

payment arrangements will not normally be considered unless the debtor's circumstances have changed. Anyone experiencing difficulty in making payments under a payment arrangement due to a change in circumstances should contact the Council as soon as they experience difficulty.

## 4. Debt Recovery

### 4.1 Enforcement Action

It is widely recognised to be good practice to take prompt action where a payment becomes overdue. Commencing action promptly ensures that the debtor is reminded of the requirement to make a payment as early as possible; allowing them the opportunity to bring payments up to date before the debt increases or more severe action to recover payment is commenced.

The Council will contact promptly in writing, within the appropriate legislative timescale, any person or organisation that fails to make a payment to inform that the payment is overdue, the payment options available and the consequences of failing to pay. Wherever possible correspondence issued in relation to debts will be provided in simple language.

Where the collection of sums due results in increased cost to the Council the person owing the debt should be responsible for paying the full cost incurred to recover the amount. Therefore, the Council will seek to recover all costs or fees that are legitimately due from a debtor. It is a requirement of this Policy that any costs or fees should be reasonable and should reflect the actual cost incurred.

Due to the volume of accounts payable to the Council, the Council will employ automated Dunning processes to progress the recovery of sums due. Where a debtor contacts the Council in response to enforcement action the Council will consider each case individually. Automated processes will not be used to progress severe remedies.

The Council recognises that people do not pay their debts for a variety of reasons:

- Some people genuinely struggle to meet their payments and need advice and assistance in budget management.
- Some people are not receiving the benefits or reductions they are entitled to.
- Some people go through personal difficulties that result in short-term problems in paying their debts.
- Some people deliberately choose to set out to delay and not pay their debts.
- Some people are not very organised in managing their finances resulting in erratic payments.

Where the debtor is willing to provide information about their personal and financial circumstance the Council will take this into account in determining the enforcement action to be taken, and in agreeing any payment arrangement.

The debtor's previous history in paying sums due to the Council will also be taken into account.

### 4.2 Recovery Processes

The Council will establish timely and vigorous processes for the recovery of overdue sums and will start to recover unpaid debt promptly when a payment becomes overdue or an instalment plan or



payment arrangement is not maintained. The Council will be stringent in recovering overdue amounts from persistent non-payers and late-payers.

Details of the recovery processes to be followed for the different types of debt are contained in the following appendices to this document.

Council Tax Recovery Process

Non-Domestic Rates Recovery Process

Commercial Rent Recovery Process

Housing and Council Tax Benefit Overpayment Recovery Process

Parking Recovery Process

Sundry Debt Recovery Process

Use of Severe Remedies

Enforcement Officer Code of Practice

In pursuing the payment of overdue sums the Council may utilise any and all of the methods available to it in law. However, the enforcement actions employed in each case should be on an escalating basis, with repayment being sought by the least severe action, and then actions of increasing severity used where actions are not effective in securing payment.

### **4.3 Severe Remedies**

The following enforcement actions are considered to be severe remedies and should only be used in accordance with appendix 6 to this Policy.

- An application to have the debtor declared bankrupt or for other forms of insolvency.
- An application to register a charge against a property or apply for the sale of a property against which a charge is registered.
- An application to have the debtor committed to prison.

### **4.4 Vulnerable People**

The Council recognises that some members of the community may be considered to be more vulnerable and, therefore, may require additional support in dealing with their financial affairs. Vulnerability does not mean that a person will not be required to pay amounts they are legally obliged to pay. However, where a person is recognised to be vulnerable consideration should be given to;

- Allowing longer to pay.
- Postponing enforcement action.
- Assisting the person to claim benefits, discounts or other entitlements.
- Referring the person to sources of independent advice.
- Providing information in an accessible format.
- A temporary payment arrangement with lower repayment than would normally be agreed.
- Informing the Council's Adults and Community Services Directorate of any concerns regarding the debtor's safety or welfare.

The cause of vulnerability may be temporary or may be permanent in nature and the degree of vulnerability will vary widely. The following list identifies characteristics of persons who could be considered vulnerable;

- **Disabled Persons**

A person with a disability is not necessarily vulnerable for the purposes of this Policy. However, where the disability affects the persons ability to deal with their financial affairs they should be considered to be vulnerable.

- **Persons with Mental Impairment or Learning Difficulties**

If it is evident that the debtor has mental impairment or learning difficulties they should be considered to be vulnerable.

- **Persons Experiencing Serious Illness, including Mental Illness**

Where the debtor (or the debtor's partner) appears to be suffering from any condition which is serious or life threatening they could be considered to be vulnerable.

- **Persons receiving Income Support, Job Seeker's Allowance, Employment and Support Allowance or Pension Credit (or where a benefit application has been made but not yet determined)**

Those on Income Support, Job Seeker's Allowance, Employment and Support Allowance or Pension Credit are considered to be vulnerable for the purpose of this Policy as they are living on a subsistence level benefit.

- **Unemployed Persons**

Unemployment does not automatically mean the debtor is vulnerable. For example a person may have received a substantial redundancy payment and be financial secure in the short-term. However, loss of employment may result in serious financial difficulties if a person is suddenly unable to meet their existing financial commitments.

A person who has recently become unemployed after a long period of employment may be unfamiliar with processes for claiming benefits and may need additional assistance to understand their entitlements.

- **A Person who has Difficulty Understanding English**

Where a person does not understand either spoken or written English they should be considered to be vulnerable, particularly if they do not have support from family members who can speak and read English. Appropriate translations should be provided where necessary, information on how to access this is available on the Councils website via the following link: <http://www.haringey.gov.uk/index/contact/translate.htm>

- **Persons Aged Under 18**

It is unlikely that a person aged under 18 years will owe any sums to the Council, however, it is possible that a person may assist or care for a parent or other older person and could contact the Council on their behalf. A person aged under 18 years may be the only person at home when an enforcement visit is made. Anyone aged under 18 years should automatically be considered to be vulnerable.

- **Elderly Persons**

An elderly person is not necessarily vulnerable and many elderly people are financially secure and both mentally and physically healthy. However, some elderly people are frail, confused, ill, and living on fixed and limited incomes and, therefore, are considered to be vulnerable.

- **A Person Recently Bereaved**

A person suffering the recent bereavement of a close relative could be considered to be a vulnerable person.

- **Lone Parents**

A lone parent is not necessarily a vulnerable person and it is recognised that some lone parents are financially secure. However, lone parents, and in particular those with very young children, may have difficulty in undertaking employment and, therefore, rely on Welfare Benefits.

- **Pregnancy**

A person in the later stages of pregnancy may find dealing with serious financial issues stressful, particularly if they are not supported by a partner, or if they are on a low income or benefits. This may be compounded by any additional essential expenditure due to the pregnancy or birth of a child.

- **A person that has difficulty reading or writing**

A person who has difficulty reading or writing should usually be regarded as vulnerable because they will have difficulty in understanding written notices. People who have difficulty reading or writing may be reluctant to reveal their difficulties and where there is concern that a person has such difficulties the issue should be addressed in a sensitive manner.

This list is not intended to be exhaustive and each case should be considered on an individual basis taking into account all relevant factors. For the purpose of this Policy the key factor in determining that a person should be regarded as vulnerable will be that the circumstances which give rise to the concern that the person is vulnerable affect their ability to deal with their financial affairs or ability to pay.

Particular care must be taken in authorising enforcement action where the debtor is known to be vulnerable

## **4.5 Enforcement Officers and Debt Collection Agents**

A Code of Practice to be followed by Enforcement Officers and debt collection agents appointed by the Council is set out at Appendix 7 to this Policy.

## **4.6 Evasion and Fraud**

The unlawful evasion of payments due to the Council reduces the financial resources available to the Council and has a direct impact on all residents, businesses and other organisations that rely on Council services. Unlawful evasion or fraud to avoid payment will not be tolerated and where this is identified then in addition to taking action to enforce payment the Council will seek to impose such further penalties or sanctions as the law allows.

Where debts arise through evasion or fraud the Council will seek to recover payment in full as quickly as possible and will only agree payment arrangements in very exceptional circumstances.

## **5. Working with Advice Agencies**

The Council will seek to work in partnership with local advice agencies and refer people who appear to have complex benefit or money advice problems.

## 5.1 Citizens Advice Bureau

The Citizens Advice Bureau offer advice about simple debt problems, and will be able to refer debtors to a specialist advisor if the debt problem is complicated.

Website: <http://www.citizensadvice.org.uk>

### Local branches:

Tottenham Citizens Advice Bureau 551B Tottenham High Road (alleyway next to Barclays) LONDON N17 6SB  Telephone: 020 8341 2400 Web site: <a href="http://www.haringeycabx.org.uk">www.haringeycabx.org.uk</a>	Turnpike Lane Citizens Advice Bureau 7 Willoughby Road LONDON N8 0HR  Telephone: 020 8341 2400 Web site: <a href="http://www.haringeycabx.org.uk">www.haringeycabx.org.uk</a>
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When assessing a person's financial situation an income and expenditure form replicating the form used by the Citizens Advice Bureau will be used and expenditure declared will be measured against the Bureau's common financial statement. This will ensure a consistent approach is taken to assessing a person's financial circumstances using a widely recognised methodology.

## 5.2 Money Advice Centres

Money Advice Centres can also provide help with debt problems. Details of the nearest centres may be found by accessing the DirectGov website: [www.direct.gov.uk](http://www.direct.gov.uk) and following the link to Community Legal Advice or by telephoning the helpline on 0845 345 4345

## 5.3 National Debtline

The National Debtline provides free debt management information to people living in England and Wales. Debtors can contact National Debtline by calling them on 0808 808 4000 or via their website at [www.nationaldebtline.co.uk](http://www.nationaldebtline.co.uk)

## 5.3 Business Debtline

The Business Debtline provides advice for small business in England and Wales. Debtors can contact them by telephone on 0800 197 6026 or via their website: [www.bdl.org.uk](http://www.bdl.org.uk)

# 6. Miscellaneous

## 6.1 Equality Duty

The Council has a statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010.

In determining this Policy consideration has been given to the Council's statutory equality duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations and an equality analysis was conducted. It was concluded that this Policy has a positive effect on the Council's duty.

Acting in accordance with this Policy will help to ensure that the collection of sums due is conducted in a consistent and objective manner that will reduce the risk of inadvertent discrimination against persons with protected equality characteristics. It will also ensure and that revenue collection and recovery is delivered in an equally accessible manner to all members of the community.

## **6.2 Exceptions to the Policy**

On rare occasions it may be in the best interests of the Council or local residents for action to be taken in the collection or recovery of a debt other than in accordance with this Policy. On such occasions a decision may be taken by an appropriately senior officer to allow an exception to the Policy having considered the normal requirements of the Policy, the specific case and the interests of the Council and local residents.

Where such an exception is made to the Policy the decision and the reason for the decision shall be recorded in writing by the officer making the decision.

## **6.3 Measuring Performance**

The Council aspires to be a high performing Council in all its undertakings including the collection of revenue. The collection of revenue will be monitored through the use of performance indicators. Key indicators of performance will be reported as part of the Council's performance management framework.

Where comparative information is available either nationally or locally the Council will aim to be in the top 25% performing unitary authorities and will publish performance information annually. The performance of external service providers will be monitored to ensure services are provided in accordance with this Policy.

## **6.4 Disputes, Complaints and Mistakes**

It is recognised that mistakes in the billing, collection or recovery of amounts due can cause distress and the Council aims to issue all bills for the correct amount and to ensure enforcement action is necessary and proportionate. If an apparent mistake is brought to the Council's attention the issue will be investigated promptly and where a mistake has been made an apology will be made and the mistake rectified.

Any disputes raised regarding the application of this Policy should, in the first instance, be raised with the relevant Council service. In the event that the dispute cannot be resolved then the dispute shall be dealt with in accordance with the Council's Complaints Procedure.

## **6.5 Disclaimer**

The Council will seek to adhere to this Policy, however, no omission in respect of the requirements of this Policy shall invalidate a requirement to make a payment, nor shall it be accepted as a basis for delay in the making of a payment.

The Policy does not affect the statutory rights of the Council or the debtor.

## **6.6 Use of Data**

The Council will collect and store personal data for the purposes of the effective billing, collection and recovery of sums due. Data retained for this purpose will be processed in accordance with the Data Protection Act 1998 and will be stored securely at all times.

Further information regarding Data Protection can be found on the Councils website using the following link:

<http://www.haringey.gov.uk/index/contact/data-protection.htm>