NORWICH City Council

Committee name: Cabinet

Committee date: 04/06/2025

Report title: To seek the adoption of a Corporate Debt Strategy and approve the Corporate Debt Policy for Norwich City Council

Portfolio:	Councillor Harper, Cabinet Member for Finance and Major Projects
Report from:	Interim chief finance officer (S151)
Wards:	All wards

OPEN PUBLIC ITEM

Purpose

To seek the adoption of a Corporate Debt Strategy and approve the Corporate Debt Policy for Norwich City Council.

Recommendation:

It is recommended that Cabinet resolves to adopt a Corporate Debt Strategy and approves the Corporate Debt Policy for Norwich City Council.

Policy framework

The council has five corporate priorities, which are:

- A prosperous Norwich.
- A fairer Norwich.
- A climate responsive Norwich.
- A future-proof Norwich.
- An open and modern council.

This report meets the following corporate priorities:

A prosperous Norwich;

A fairer Norwich;

A future proof Norwich and;

An open and modern council.

Report details

1. Income owed to the council is diverse in nature, ranging from low value debts for one-off items and for potentially re-occurring items such as overpaid housing benefits, council tax and housing rents, to high value debts such as business rates and property rents.

2. In total, it is estimated that the council raises invoices for c£227m of income per annum using several systems depending on the category of debt including:

    - NEC Revenues and Benefits
    - NEC Housing
    - Unit 4 Sundry Income

3. As at 31st March 2024, all arrears stood at just over £36m shown in the table below together with an analysis of the bad debt provisions held against each debt type. At 31st March 2025 arrears were just over £39m.

	Arrears at 31st March 2024	Provision for bad debts	Arrears at 31st March 2025
	£000's	£000's	£000's
Business Rates	4,334	2,817	5,064
Council Tax	15,427	11,570	14,840
Overpaid Housing Benefits	4,304	3,192	4,137
Rents (including Former Tenant Arrears)	7,000	4,686	8,417
Court fees (CTax and B Rates)	693	N/A	761
Sundry debts	4,529	1,812	6,063*
Total	36,287	24,077	39,282

*this figure includes new quarter invoices

4. The covid-19 pandemic and resulting lockdowns followed closely by the economic crisis pushed many households in England into council tax debt for the first time. It also resulted in a corresponding rise in the overall level of in-year council tax and rent arrears, highlighting local government's ever-growing reliance on council tax revenue.

5. Reduced Central Government funding along with the pressures faced by residents and businesses due to the economic downturn and welfare changes means effective debt collection is more important than ever.

6. Developing a high-level debt recovery strategy for the council across all service areas involves balancing effective recovery practices with fairness, transparency, and support for vulnerable residents.

7. The strategy sends a clear message about how the council intends to move forward on debt collection, but more importantly, should members adopt the strategy, it will ensure consistency in managing debt across all services.

8. The main strategic objectives are to:

    - Ensure timely and efficient collection of all outstanding debts across service areas.
    - Provide support mechanisms for individuals in financial hardship.
    - Minimise bad debt write-offs and protect public funds to sustain essential services.
    - Ensure the process is transparent, equitable, and compliant with relevant regulations and standards.

9. The main aim will be to prevent debt by:

    - Implementing systems to identify at-risk accounts early and engage with debtors proactively.
    - Offering tailored payment plans using various payment methods.
    - Collaborating with advice agencies to provide financial education and budgeting support.

10. By using ethical enforcement practices we will:

    - Support Vulnerable Residents:
    - Implement safeguards for those experiencing financial hardship, guided by vulnerability assessments.
    - Offer access to third-party debt advice services.
    - Ensure enforcement measures (e.g., court summons, enforcement action) are a last resort and proportional to the debt owed.
    - Contract with enforcement agencies that align with the council's values and adhere to ethical recovery standards.

11. By using data to ensure efficiency and effectiveness across the council we will:

    - Use data analytics to understand and consolidate debts across services and create a single view of each debtor.
    - Categorise debtors based on payment history, vulnerability, and risk to prioritise actions.
    - Establish Key Performance Indicators such as recovery rates, aged debt levels, and cost-to-collect ratios to measure effectiveness

12. The anticipated outcomes will ensure:

    - Efficient collection of outstanding debts, preserving resources for delivering public services.
    - Fair and compassionate treatment of residents and businesses.
    - A sustainable financial position for the local authority.

These will be something that can be reviewed and assessed for effectiveness.

13. The strategy is underpinned by the council's new Corporate Debt Policy and Vulnerability Framework. Both these documents outline the key objectives and

guiding principles to ensure consistent and effective debt management across all council services.

14. The council already has additional policies relating to Hardship and Discretionary Reliefs for Council Tax and Business Rates and can write-off debts where they are considered uncollectable.

Consultation

15. The strategy is intended to be for internal use but shared with relevant stakeholders such as the Enforcement Agencies contracted by the council and the Financial Inclusion Consortium.

16. Internal consultation has taken place within relevant service areas and portfolio holders. Their views have contributed to the preparation of the strategy.

17. Once the strategy has had time to be embedded, feedback will be sought from customers and advice agencies to shape any amendments required to the strategy or any of the relevant policies.

Implications

Financial and resources

18. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its community-led plan "We are Norwich" and budget.

19. The council is currently undertaking a debt project, which is looking at processes across services and leading to a consistent approach to debt collection in a more cohesive way. The project is currently in Phase 2 having completed all the discovery work. To date over £3m of debt has been written off, paid in full or is in a payment arrangement as a result of this additional work.

20. The final report to the Debt Board will make recommendations on the best way forwards to ensure the project success is not hindered by a future lack of resource, but also that the resource is in the right place.

21. Any reduction in a household's disposable income will have a detrimental effect to businesses in the city, with lower turnover, resulting in higher cases of closure, and those businesses which continue to trade will do so with the prospect of lower income levels.

22. Businesses are also under more financial pressure with the increase to the National Minimum Wage and National Insurance contributions.

23. Effective billing, payment methods, income management and debt collection are essential for conducting the business of the council.

24. It follows that even a small reduction in collection rates of, say, 1% would have a significant impact on the council's overall financial position. This could have cashflow implications for the organisation, even if the money is later collected, as well as increasing the risk of unmanageable debt. The aim will always be to

recover in-year debt first before tackling arrears.

25. It is crucial the Corporate Debt Strategy and complementing policies help to strike the right balance between the council's role as a Local Authority interested in the wider economic and social needs of the City, especially vulnerable citizens, and the need to provide an efficient organisation looking to reduce overall costs in an increasingly challenging financial environment.

Legal

26. Local authorities are required to collect monies from both residents and business for a variety of reasons such as Council Tax (Local Government Finance Act 1992) and Business Rates (Local Government Finance Act 1988) and Housing Rents. (Housing Act 1988).

27. Local authorities also have various legal powers to pursue other types of debts. These depend on the nature of the debt involved and are specific to certain services such as off-street parking charges (Road Traffic Regulation Act 1984).

28. Where no specific power exists, the council could rely on Section 1 of the Localism Act 2011. This provides local authorities with a "general power of competence" and allows them to "do anything that individuals generally may do."

29. Where legal proceedings are used to recover a debt, the council must have regard to the requirements of the Pre-Action Protocol for Possession Claims by Social Landlords and the Pre-Action Protocol for Revenues Collection.

30. On priority of debt, this area of the accompanying corporate debt policy was approached by looking at how the courts would consider this issue. The priority of debt is based on welfare and protecting human rights. Broadly, paying off debts in the suggested order to minimise the impact on the individual.

Statutory considerations

Consideration	**Details of any implications and proposed measures to address:**
Equality and diversity	See attached Equality Impact Assessment
Health, social and economic impact	Strategy and policies address these areas
Crime and disorder	N/A
Children and adults safeguarding	N/A
Environmental impact	N/A

31. The main potential impact with the strategy arises from the debts accrued through Council Tax and Housing Rent arrears and can be associated with the

socio-disadvantaged residents and low earners where there will inevitably be groups with protected characteristics.

32. A key focus of the Corporate Debt policy is making clear we must appropriately treat potentially vulnerable groups, where vulnerability may arise due to age, disability, health issues or those experiencing poverty or financial hardship. It also identifies best practice principles for charging our customers and the methods of payment we will use.

33. The Vulnerability Framework will enforce how we treat vulnerability in all of our processes moving forwards.

34. The council has recently contracted with two new Enforcement Agencies and the Strategy, updated Policies and Vulnerability Framework will be shared with both.

35. Such approaches help customers to avoid falling into serious debt and fits in with the council's ongoing wider agenda to provide excellent quality, modern public services.

36. If debt is tackled at an early stage it is easier to support a debtor, and the council will look at ways it can encourage debtors to seek advice as early as possible.

37. Clarity over how to manage customers with multiple council debts will help minimise the impact of being in debt. Overall, adoption of the Corporate Debt Strategy and policies should therefore have a positive impact.

Risk management

Risk	**Consequence**	**Controls required**
Failure to recover outstanding debt in a timely manner could exacerbate the financial pressure on the authority and lead to an increase in the bad debt provisions required.	Level of debt increases.	Vulnerability Framework in place. Management of debt with a corporate approach. Adequate resources to recover debt.
Inability of residents and businesses to pay their bills.	Impacts on overall council finances.	Work with relevant groups to educate and raise capability to manage finances. Consider the impact on the debtor of the consequences of any recovery options pursued, and proportionality of these.

38. The Corporate Debt Strategy captures and builds on best practice already conducted at service levels. The Corporate Debt Policy clearly states that the council will operate in accordance with all relevant legal, financial, and regulatory requirements, including the Public Sector Equality Duty. The Vulnerability Framework gives guidance to officers when supporting vulnerable people.

Other options considered

39. No other options have been considered.

Reasons for the decision/recommendation

40. The council does not currently have a Corporate Debt Strategy. To support the relevant corporate priorities it is beneficial to have a strategic steer on debt collection that covers all service areas, helping teams to work together to support a single view of debt.

41. The Corporate Debt Management Policy and Vulnerability Framework:

- Set out the way that the council will adhere to the collection of debt.
- Ensure that debt is collected cost effectively and at acceptable target levels.
- Has recognition of the personal financial circumstances of debtors.

42. Members should note the intention of officers to undertake more work around those debtors owing the council multiple debts.

43. It is proposed that the Strategy is reviewed annually.

Background papers: None

Appendices:

Appendix One- Corporate Debt Strategy
Appendix Two- EqIA Corporate Debt Strategy
Appendix Three- Corporate Debt Policy
Appendix Four- EqIA Corporate Debt Policy
Appendix Five- Vulnerability Framework

Contact officer: Head of Revenues and Benefits

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IN TRAN communication for all	If you would like this agenda in an alternative format, such as a larger or smaller font, audio or Braille, or in a different language, please contact the committee officer above.

Appendix One

Norwich City Council

Corporate Debt Strategy

2025-2028

Vision:

The council's vision is to have a best-in-class debt recovery team and processes to ensure the council maximises income, collecting debt promptly and effectively while ensuring fair and equitable treatment of our customers.

1. Introduction:

Developing a high-level debt recovery strategy for Norwich City Council across all service areas involves balancing effective recovery practices with fairness, transparency, and support for vulnerable residents.

The strategy is underpinned by the council's new Corporate Debt Policy and Vulnerability Framework. Both these documents outline the key objectives and guiding principles to ensure consistent and effective debt management across all council services.

Service areas also have specific policies such as the Council Tax Hardship Policy and the Business Rates Discretionary Relief Policy which support residents and businesses with debt and income maximisation.

The strategy will be in place for a period of 3 years and reviewed annually.

2. Strategic Objectives

• Maximise Debt Recovery: Ensure timely and efficient collection of all outstanding debts across service areas.

• Promote Financial Inclusion: Provide support mechanisms for individuals in financial hardship.

• Safeguard Public Resources: Minimise bad debt write-offs and protect public funds to sustain essential services.

• Enhance Public Trust: Ensure the process is transparent, equitable, and compliant with relevant regulations and standards.

3. Governance and Policy Framework

• Unified Corporate Debt Management Policy: A single, overarching policy to govern debt recovery across all service areas (e.g., council tax, business rates, housing and sundry income).

• Statutory Compliance: Ensure adherence to relevant legislation and guidance, such as the Local Government Finance Act 1992 and the Debt Respite Scheme ("Breathing Space").

• Clear Accountability: Defined roles and responsibilities across teams to avoid duplication and inefficiencies.

4. **Proactive Debt Prevention**

• Early Intervention: Implement systems to identify at-risk accounts early and engage with debtors proactively.

• Payment Flexibility: Offer tailored payment plans using various payment methods.

• Financial Literacy Support: Collaborate with advice agencies to provide financial education and budgeting support.

5. **Data-Driven Approach**

• Integrated Systems: Use data analytics to understand and consolidate debts across services and create a single view of each debtor.

• Risk Segmentation: Categorise debtors based on payment history, vulnerability, and risk to prioritise actions.

• Performance Monitoring: Establish KPIs such as recovery rates, aged debt levels, and cost-to-collect ratios to measure effectiveness.

6. **Streamlined Debt Recovery Processes**

• Standardised Procedures: Develop consistent recovery workflows for all service areas to ensure efficiency and fairness.

• Digital Engagement: Use online portals, SMS reminders, and email notifications to encourage self-service and prompt payments.

• Escalation Protocols: Define clear escalation pathways (e.g., reminders, final notices, enforcement action) that allow for discretion in handling vulnerable cases.

7. **Ethical Enforcement Practices**

• Support for Vulnerable Residents:

• Implement safeguards for those experiencing financial hardship, guided by vulnerability assessments.

• Offer access to third-party debt advice services.

• Proportional Action: Ensure enforcement measures (e.g., court summons, enforcement action) are a last resort and proportional to the debt owed.

• Collaborative Approach: Contract with enforcement agencies that align with the council's values and adhere to ethical recovery standards.

8. **Cross-Department Collaboration**

• Service Integration: Foster collaboration between departments (e.g., housing, revenues, accounts receivable) to share insights and coordinate recovery efforts.

• Corporate Debt Teams: Establish or empower dedicated debt recovery teams to ensure a holistic approach.

9. **Engagement with Stakeholders**

• Public Communication: Clearly communicate debt recovery policies and payment options to residents and businesses.

• Local Partnerships: Work with advice agency partners, Charities, Housing Associations, and Community groups to provide additional support.

• Business Collaboration: Engage with local businesses and relevant business forums to promote compliance with business rates and other obligations.

10. **Use of Technology and Innovation**

• Automation: Leverage technology to automate routine tasks, such as issuing reminders and reconciling payments.

• Predictive Analytics: Use data models to predict payment likelihood and target interventions effectively.

• Digital Payment Channels: Expand digital options and portals for easier payment.

11. **Regular Review and Continuous Improvement**

• Policy Updates: Review and adapt the debt recovery strategy to reflect legislative changes and best practices.

• Feedback Mechanisms: Gather insights from residents, businesses, staff and enforcement partners to improve processes.

• Performance Evaluation: Conduct annual reviews of recovery performance and identify areas for improvement.

12. Outcome Focus

A robust Corporate Debt Strategy will ensure:

• Efficient collection of outstanding debts, preserving resources for delivering public services.

• Fair and compassionate treatment of residents and businesses.

• A sustainable financial position for the local authority.

Equality Impact Assessment

Appendix Two

What is being assessed	Corporate Debt Strategy	**Status**	First assessment of a new proposal
Officer completing	Tanya Bandekar	**Role**	Head of Revenues and Benefits
Team	Revenues and Benefits	**Directorate**	Resources
Senior leadership team sponsor	Alistair Rush	**Role**	Director of Finance (Sec 151)

What are the main aims or purpose of the policy, practice, service or function? *(include links to project briefs, cabinet reports etc)*

The Council aims to have a best-in-class debt recovery team and processes to ensure the Council maximises income, collecting debt promptly and effectively, whilst ensuring fair and equitable treatment for all our customers.

How does it fit with other services and policies, and how does it support our corporate objectives and City Vision?

The new Corporate Debt Strategy supports the Council in its delivery of the 'Open and modern council' and 'Fairer Norwich' priorities within its Community-Led Plan.

The specific aims of the community-Led Plan which are supported by this strategy are: 'A council delivering excellence' through efforts to ensure the council remains financially stable and 'tackling the root causes of disadvantage' through the offer of financial advice and support for individuals experiencing financial hardship and debt.

The strategic objectives of this strategy are to:

• Maximise Debt Recovery: Ensure timely and efficient collection of all outstanding debts across service areas.

• Promote Financial Inclusion: Provide support mechanisms for individuals in financial hardship.

• Safeguard Public Resources: Minimise bad debt write-offs and protect public funds to sustain essential services.

• Enhance Public Trust: Ensure the process is transparent, equitable, and compliant with relevant regulations and standards.

What is the reason for the proposal or change (financial, legal etc)? *The Equality Act requires us to make this clear.*

The council is undertaking a Debt Project, which is looking at the way debt is being recovered currently, reviewing processes and procedures to ensure effectiveness, and will make recommendations for the future of debt collection at the end of the project. There is currently no Corporate Strategy, and teams largely manage debt themselves.

Who implements, carries out or delivers the policy, practice, service or function? *(person/team/body and other organisations who deliver under procurement or partnership arrangements)*

Officers collecting the following debt.

- Council Tax
- Business Rates
- Overpaid Housing Benefit
- Overpaid Council Tax Reduction
- Council Housing Rent, current and former tenants
- Rechargeable repairs and voids
- Residential Garage Rent
- Commercial Property Rent and Service Charges
- Leaseholder payments
- Planning CIL (Community Infrastructure Levy)
- Other sundry income debts (incl. licensing, halls and events, statutory notices, housing service charges, homeless prevention loans, garden waste collection etc.)
- Car parking excess charges
- Recovery of enforcement costs and civil penalties, including works in default
- Charging for discretionary services or any money due to the council under terms of an agreement to pay for goods, services, or property.

What outcomes do we want to achieve, why and for who?

The outcome focus will be the:

• Efficient collection of outstanding debts, preserving resources for delivering public services.

• Fair and compassionate treatment of residents and businesses.

• A sustainable financial position for the local authority.

Decisions must be evidence-based and involve people with protected characteristics and other relevant groups that could be affected. Please use the remaining sections to demonstrate understanding of who could be affected by the proposal.

Will anyone be disproportionately affected by the programme, and/or will it create any benefits? *(customers, employees, groups in the wider community etc)*

Any resident or business can be affected by debt, not just those with protected characteristics. The benefits will be that all service areas will work to the new Strategy and Debt Policies which will deliver a more structured approach to debt for customers. The strategy will ensure that vulnerable debtors are treated sensitively and signposted to receive the best support as a result of the policies underpinning the strategy.

If yes, complete the relevant sections below for any benefits and adverse impacts identified.

Affected group	Key findings from analysis of data and evidence. Identify any gaps in data here	Level & type of impact: low/medium/high, positive/adverse	Justifiable if adverse	Actions to mitigate impacts, maximise benefits or address identified gaps in data	By when
Age	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Disability	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Gender reassignment	N/A	No specific impact identified	N/A	No specific impact identified	N/A

Marriage and civil partnership	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Pregnancy and maternity	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Race/ethnicity	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Religion and belief	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Sex/gender	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Sexual orientation	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Other groups	Vulnerable customers, whether the vulnerability is temporary or permanent	Medium	Not adverse	The Corporate Debt policy will address vulnerability, as will any new Vulnerability framework.	31/7/25

What evidence and data has been used for this assessment, including community engagement and consultation? *(include links to data sources, consultations etc)*

Consultation has taken place internally with all service areas and officers responsible for debt collection. A key learning point is to keep debt recovery high on the agenda as tackling debt early can lead to much better outcomes for customer. The strategy and policy are both intended to support officers in debt collection. It is intended to review both externally once they are embedded and any changes required can be addressed through these reviews.

Policy In Practice undertake regular webinars around debt. Their evidence suggests that more people are falling into debt with negative income, and this is an emerging challenge, however this would appear to be mostly working age rather than anyone with a protected characteristic. Debt advice agencies are also engaged to tackle debt earlier and regular communications with debtors will be key to the success of the strategy.

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of the impacts identified has influenced your proposal, and how the findings of the Equality Impact Assessment can be measured going forward.

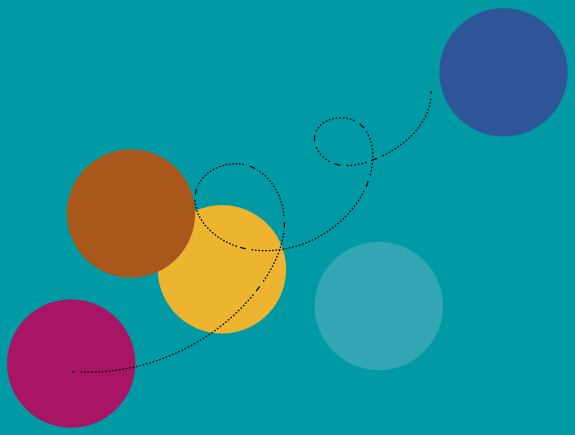
How has the equality impact assessment informed or changed the proposal?

The Strategy has been developed alongside the EqIA to ensure that it is fair and equitable to all. This is a high level EqIA which will be revisited once the strategy has had time to be embedded in service areas.
What actions have been identified going forward? To review both the Strategy and Policy at a reasonable interval to ensure both are fit for purpose. An EqIA will be completed for the Corporate Debt Management Policy which will support this strategy.
How will the impact of your proposal and actions be measured moving forward? Feedback from debtors. Number of compliments Number of complaints in service areas and about Enforcement Agents Feedback will be used to ensure the current approach is suitable and is proactive towards the debtor's circumstances rather than reactive. Both the Strategy and Policies will be sense checked and can be revisited alongside any comments amd suggestions from the Financial Inclusion Consortium and National Debt agencies/charities.

Once complete, email to: strategy@norwich.gov.uk For the assessment to be final, the relevant people agreeing it must sign off this section

Officer completing assessment	**Tanya Bandekar**	**Date**	**29.1.25**
Senior leadership team sponsor	**Alistair Rush**	**Date**	**20.5.25**
Equality lead (strategy team)	**Joe Siggins**	**Date**	**20.5.25**

NORWICH
City Council



Corporate Debt Management Policy

2025 to 2028

Policy

Corporate Debt Management

Owner: Debt Manager

Approval level: ELT

Version: v3

Published date: June 2025

Review period: 3 years

Review date: 2028

Relevant legislation or regulation: Included in the policy

Version control			
Date	Version number	Reason	Author
05/04/2025	V1	Draft	Nigel Hunt
10/04/2025	V2	To ELT	Nigel Hunt
08/05/2025	V3	To Cabinet	Nigel Hunt

Contents

1. Purpose

1.1 This policy is designed to set out a robust framework for Norwich City Council (NCC) employees and provide clear guidance for all council Officers on the recording, reporting, recovery, and monitoring of income.

1.2 This policy is aligned with and supports the overarching Corporate Debt Strategy, which outlines the key objectives and guiding principles for managing the council's overall debt portfolio. The Strategy provides the strategic framework within which this policy operates, including processes, practices and use of technology and innovation. This policy translates those strategic objectives into operational guidelines and principles to ensure consistent and effective debt management.

1.3 This policy covers all debts shown in section 4.

1.4 The council has a legal duty to ensure cost-effective billing, collection, and recovery of all sums due to the council.

1.5 All service areas must follow this policy to ensure that the council maximises income by using a co-ordinated approach whilst having due regard to the customer's ability to pay.

1.6 Below this sits the new Vulnerability Framework, which gives operational guidance for dealing with and supporting individuals and customers who may find themselves in difficulties with debt in a fair and transparent way.

1.7 For the avoidance of doubt when this policy states 'customers' it includes both individuals, whether private citizens or sole traders and organisations.

2. Objectives

2.1 The policy objectives are:

- To treat customers fairly when assessing ability to pay.
- Know your customer (Conduct financial due diligence on all commercial customers).
- To follow all appropriate legislative requirements and procedures in an efficient and effective way.
- To use all methods available to recover debts.
- To ensure that benefit entitlement is accurately and efficiently applied to maximize the debtor's income.
- To have clarity in the enforcement action process.
- To identify and assist those who face difficulties in paying at an early stage and to actively encourage them to contact us.
- To signpost potential debtors to advice agencies and other sources of support and do everything possible to encourage them to use them.
- To identify customers who face barriers in understanding what is expected of them e.g., because of age, language, culture or disability.

3. Outcomes

3.1 The outcomes expected from this policy are to:

- Set out the general principles of debt management across all services provided by Norwich City Council in accordance with the Corporate Debt Strategy & Vulnerability Framework.
- Ensure a consistent approach to the management of debts across the authority.
- Obtain prompt payment to agreed terms and conditions.
- Identify and enforce against deliberate non-payers or people who delay payment without good reason.
- Set out provisions to assist customers to make payment agreements appropriate to their circumstances.

- Ensure individuals and organisations financial circumstances are considered on a case-by-case basis before enforcement proceedings are commenced.

4. Debts to which this policy applies

4.1 For the avoidance of doubt, this policy document applies to all debts and income due to the council including but not limited to:

- Council Tax
- Business Rates
- Overpaid Housing Benefit
- Overpaid Council Tax Reduction
- Council Housing Rent, current and former tenants
- Rechargeable repairs and voids
- Residential Garage Rent
- Commercial Property Rent and Service Charges
- Leaseholder payments
- Planning CIL (Community Infrastructure Levy)
- Other sundry income debts (incl. licensing, halls and events, statutory notices, housing service charges, homeless prevention loans, garden waste collection etc.)
- Car parking excess charges
- Recovery of enforcement costs and civil penalties, including works in default
- Charging for discretionary services or any money due to the council under terms of an agreement to pay for goods, services, or property.

5. Priority debts

5.1 Priority debts are those debts that can result in loss of essential service, loss of home or imprisonment.

Housing
- Mortgage/Rent
- Council Tax
- Secured Loan

Utilities
- Electricity
- Gas
- Telephone

Other
- TV licence
- Court Fines
- Overpaid tax credits
- Hire purchase
- Income Tax, VAT, National Insurance
- Child Maintenance

5.2 Non-Priority debts could include
- Credit cards
- Unsecured loans

- Unpaid water bills
- Overpayment of benefits
- Penalty charge notices

6. Roles & responsibilities

Financial Services leadership

6.1 The leader of the finance organisation is the Director of Finance (Sec 151) who has statutory responsibilities in relation to the council's financial affairs.
6.2 In addition, the Director of Finance is responsible for regulating and controlling the finances of the council and hence he/she shall be responsible for the proper administration of the council's financial affairs.
6.3 Heads of Service have responsibility for the raising and recording of debts in relation to Services they manage.
6.4 Income relating to all types of debt should always be handled in accordance with the council's Constitution and the Financial Regulations.
6.5 Where the council is made aware that a debtor owes multiple debts to the council and unless the debtor advises to the contrary, debts will be considered in a priority order, to avoid the customer losing their tenancy, or going to prison for non-payment as follows:

- Rent Arrears
- Council Tax Arrears
- Business Rates
- Other

7. General principals

7.1 The general principles adopted in this policy are as follows:

- To ensure a professional, consistent, and timely approach to debt recovery action across all of the council's functions.
- To limit the circumstances in which credit is offered by considering the customer's circumstances and ability to pay prior to granting any credit terms, and to only extend credit to those customers in a position to pay the debt in accordance with the council's terms.
- If the customer's circumstances do not justify the granting of credit, payment in advance should be offered for the goods/services.
- For some debts, particularly those paid periodically, such as garden waste, periodic rents, or licensing, the preferred method of payment is by electronic means and where possible direct debit should be selected.
- To promote a coordinated approach towards sharing debtor information internally and managing multiple debts owed to the council.
- To improve the speed of collection and the levels of income collected by the Authority.
- To ensure that debts are managed in accordance with legislative provisions and best practice.
- To consider the impact on the debtor of the consequences of any recovery options pursued, including their mental wellbeing and the proportionality of the option chosen.
- To try and protect customers from undue financial hardship by ensuring realistic payment arrangements are agreed upon.
- Where appropriate, to encourage the debtor to make contact with relevant organisations for debt management advice, and to do everything possible to ensure they take up these options.
- To differentiate between the debtor who will not pay, and the debtor who cannot pay, and take appropriate action in either case.

- To maintain debt recovery procedure notes for staff and regularly update these, as well as provide face to face training, including as part of the relevant induction process.

8. Delivering the policy

8.1 Delivering the policy involves several processes which are explained in more detail below:

- Customer on-boarding due diligence.
- Raising of invoices
- Methods of Payment
- Refunds and contras
- Collection and Recovery
- Social Inclusion – the ability to pay.
- Bad Debt Provision
- Writing debts off

Customer on-boarding & credit risk due diligence

8.2 The process used to set up a customer on the system and to assess their credit risk is key to maximising the ability to recover debts. Making sure that you are dealing with the correct customer you must perform what is called 'due diligence.' Due diligence takes the form of collecting accurate legal name and address details and performing a credit check, typically with Dun & Bradstreet/Experian and using Companies House to ascertain the credit score and legal details of the organisation to determine the risk of trading with the customer and the likelihood of obtaining recovery of the debt.
8.3 This information is used to set up the correct customer in the finance system to allow accurate invoices to the produced and sent to the customer for prompt payment.
8.4 Before providing requested goods or services to a company for more than £10,000 for which payment will be invoiced, officers must carry out a credit check and/or company search to establish the financial standing of the organisation and if concerns are raised, a payment in advance should be sought.

Raising Invoices

8.5 Invoices are generated accurately and promptly based on agreed upon terms.
When charging for goods and services provided, the council will make it as easy as possible for customers to pay by seeking to raise the invoice within 10 working days of delivering the service or goods or of the commencement of the period where service covers a period of time.
8.6 Invoices include all relevant details, such as billing period, due date, itemised charges, and payment instructions. The invoice frequency (e.g. monthly, quarterly, or annually) is clearly indicated. Invoices will be sent via secure methods, either via email or post but email will be the preferred default method.
8.7 All information will be clearly written, without the use of jargon.

Methods of Payment

8.8 The council will promote the use of Direct Debit as a preferred payment method, maximising the use of this wherever possible. It will discourage the use of cash and cheque, by persuading customers to use more electronic methods of payment.
8.9 The council will accept payment of debt by credit/debit card.
8.10 All Invoices/Demand Notices will include information on how and where payments can be made i.e. listing the various options we offer, for example: -

- Bank account details for bank transfers.
- Direct Debit
- Standing Order
- Pay Point
- Post Office
- Card Payments
- Internet Payments

8.11 Customers may request an instalment arrangement for debts which will be considered by the relevant service area. The instalment amount offered, and frequency of the payments, will be based on an assessment of the likelihood of the customer meeting the arrangement. The emphasis will be put upon Direct Debit payments when agreeing such arrangements.
8.12 Whatever the method of payment individuals must ensure that payments made reach the council by the due date.
8.13 Housing Benefit overpayments will be recovered from on-going benefit /Universal Credit where possible.
8.14 Council Tax Reduction excess payments will be recovered from the claimant's Council Tax account where possible.
8.15 For debts under £20 alternative methods of payment should be sought such as by card/bank payment rather than by invoice.

Collection and Recovery

8.16 The collection of income in respect of invoices/demand notices raised must follow a standard course, which fully documents the efforts made to settle the debt. It is recognised that certain debts such as Council Tax and Business Rates will have a more regulated period for recovery.
8.17 The recovery process for each type of debt covered by this policy is shown in Appendix 1 with the following principles applying to unregulated debt:
8.18 Invoices raised in respect of services delivered are normally due for payment immediately although the maximum payment terms are 30 days unless otherwise agreed with the Director of Finance (Sec 151).
8.19 If no payment is received within 10 working days of the invoice date or agreed payment terms a reminder letter will be issued.
8.20 For Sundry Debts, where debts in respect of services provided remain unpaid after the first reminder, a second debt notice is raised, and the provision of further services will cease (where possible) until the debt is paid.
8.21 If no payment is received within 10 days of the reminder letter, a final demand will be sent.
8.22 If no payment is received within 10 days further recovery action will be initiated which may include legal proceedings and/or referral to debt collection agencies.
8.23 Where legislation permits, the council will seek to levy and recover from the debtor all costs/fees that are legitimately due from the debtor to the council or its agents. Only in exceptional circumstances, where it would not be in the public interest to pursue costs/fees will they be waived.
8.24 The council will contract with Debt Collection Agencies in respect of unregulated debt that remains unpaid after the final reminders have been issued. Heads of Service will be expected to use agencies contracted by the council.
8.25 All debts will be taken into consideration when referring the debt for legal recovery. Where multiple debts are owed, the council will endeavour to consolidate those debts before taking recovery action.

Customers who find themselves in arrears

8.26 Customers are encouraged to contact us early if they are having difficulty paying any debt owed to the council and advise them where to get independent advice as appropriate. Many customers are unaware of their rights and responsibilities and of the availability of a variety of payment options.
8.27 If customers contact the council as soon as they fall into arrears, we will discuss the situation and prepare a payment plan. This will help customers to be in control of their debts.
8.28 When customers contact us, we will:

- Comply with current service standards.
- Check whether they should be paying less or nothing at all by ensuring that all the relevant benefits, reductions, discounts, reliefs, exemptions, and rebates are being claimed.
- Advise on the most appropriate payment methods.
- Make a realistic payment agreement if appropriate.
- Advise them to contact an independent advice agency if appropriate.
- Expect priority debts to be given precedence over other debts.

8.29 All information collected by the council is governed by the General Data Protection Regulations 2016/679 which were implemented on 25th May 2018.

Breathing Space

8.30 If you live in England or Wales, a debtor can get temporary protection from creditors while they get debt advice and make a repayment plan. This scheme is called 'Breathing Space.'
To apply for the 'Breathing Space' scheme, a debtor would need to talk to a debt adviser. They will apply on the debtors behalf if it is the right thing to do.
8.31 A debtor can find a free debt adviser on the MoneyHelper website and can get confidential advice online, over the phone or in person.
If a debtor is receiving mental health treatment and cannot speak to a debt adviser, someone else can do so on their behalf. A debtor receiving mental health crisis treatment will have protection from creditors for the length of their treatment, plus another 30 days.

Vulnerability and the ability to pay

8.32 Ability to pay is a paramount concern when considering debt recovery; however, we will also take into account each individual's circumstances. For those that we identify as vulnerable we will work across service areas and with external agencies to achieve the best outcome, which balances the council's need to recover debt with the well-being of the individual/family. Reference can be made to the Vulnerability Framework for more guidance on dealing with vulnerable individuals.
8.33 Our Enforcement Agents also identify vulnerable cases and have protocols in place for supporting vulnerable debtors. The Enforcement Agent will report any potential vulnerable cases after establishing the debtor or their partner falls into any of the established definitions of vulnerability.
8.34 A customer can be vulnerable in lots of different situations, for example if:

- disabled.
- or seriously ill.
- have mental health problems.
- have small children or are pregnant - especially if a single parent.
- elderly.
- does not have English as a first language
- have been the victim of a crime.
- become unemployed.
- a death in the family.

8.35 This is not a prescriptive list but potential indicators. All individual cases will be considered and decided upon their merit.
8.36 Where applicable, an "income and expenditure" form can be used to ensure that officers can ascertain a customer's total income and expenditure, and agree a consolidated affordable payment, which will clear all overdue sums over an appropriate period.

Hardship Relief

8.37 The council has the authority to reduce council tax payments in cases of financial hardship. Each application is assessed individually to decide if relief is warranted.
8.38 The council can offer hardship relief from business rates to businesses that are having temporary financial difficulties, where the business owner would suffer financial hardship and it is in the best interests of the community to give relief.

Information and Advice

8.39 The council provides information to all debtors on its website www.Norwich.gov.uk which covers all services and gives details on how to pay all debts under the relevant debt type. Information is also included on bills, statements and letters.
8.40 Information is available in a variety of formats and languages when requested.
8.41 Staff will promote the services of qualified debt advisers i.e. Citizens Advice Bureau, National Debt-Line, Neighbourhood Advice Centres, Money Advice (MA) etc.

Equality Statement

8.42 We will be consistent and fair in our dealings, regardless of any protected characteristic. By administering this policy, we will assist with Financial Inclusion by offering support to enable debtors to maximize their income and to help prevent the build-up of debt.
8.43 When people get into arrears, we will:

- ensure that as far as possible, payment arrangements reflect the ability to pay as well as the level of debt owed.
- expect Priority Debts to be given priority over other debts owed to the council.
- work with recognized advice agencies wherever possible to reach an acceptable arrangement for the recovery of the debt.

Refunds & Contras

8.44 Where refunds are required from an NCC account, the officer responsible will check other areas of the councils' business to ascertain whether any debt is owed to the council for any other goods or services provided, and take that indebtedness into account, before making any refund. If another debt is owed, the customer will be advised that any credit will be used to offset that debt unless they advise to the contrary.
8.45 Likewise, when a debtor is also a supplier to the council, the council will seek to offset any overdue debts owed to the council from the monies owed to the supplier. All future supplier contracts should include a clause clarifying this right.

Bad Debt Provision

8.46 The Director of Finance (Sec 151) in conjunction with Heads of Service must ensure there is adequate provision for Bad Debts, in accordance with CIPFA[1] Code of Practice on Local Authority Accounting in United Kingdom – A Statement of Recommended Practice.
8.47 Bad debts which are usually an amount owed by a debtor that is unlikely to be paid should be reviewed quarterly to establish if circumstances have changed and the debt is now recoverable. This is particularly relevant to debt incurred as a result of works carried out in default of statutory notices.
8.48 A separate bad debt provision is held for each service area so that any increase required in the provision will be charged to the service area concerned. Conversely, if the debt for which a bad debt provision is paid then the provision for that debt will be credited back to the relevant service area.

[1] Chartered Institute of Public Finance and Accountancy

Writing Debts Off/On

8.49 All debts of the council will be acted on in accordance with its Financial Regulations. If the debt remains unpaid, after exhausting all appropriate recovery methods, the debt should be written off. All requests to write off debts must be approved by the appropriate authority as per the Financial Regulations

8.50 It would normally be expected that debts to be written off would consist of:

- Cumulative debts under £50, where no payment has been received within six months of sending the final demand.
- All debts where an Enforcement or Debt Collection Agent advises they are unable to collect, and all options are exhausted - in these circumstances the Director of Finance (Sec 151) will deem it not cost-effective to pursue.
- All debts where Legal Services advise the debts are irrecoverable or that legal action is unlikely to be cost effective.
- Debtors who have absconded/ or have been unable to be traced.
- Bankruptcy /Liquidation of debtor
- Limitations Act, where debt is older than 6 years old and no recovery action has commenced.
- Debt Relief Orders
- Debtor is deceased and there are insufficient funds in the Estate to clear the outstanding charge.
- The debt is uneconomical to collect meaning the cost of collection outweighs the value of the debt recovered.
- In cases of vulnerability and/or ill health/terminal illness where collecting the debt would cause further hardship (usually for benefit overpayment cases)

8.51 Once appropriate authorisation has been received and final authorisation for the write off obtained as appropriate, the debt will be removed from the relevant accounting system and charged against the appropriate bad debt provision.

8.52 Where circumstances change and it becomes possible to collect the debt then it will be written back on to the account and pursued.

9. Monitoring

9.1 It is the responsibility of the council to ensure the policy is effective through monitoring by considering the indicators listed below:

- Rate of collection (against targets set)
- Accounts receivable ageing profile
- Recovery of housing benefit overpayments
- Number of cases reaching each stage of recovery
- Number of cases where attachments of benefit/earnings are made
- Number of cases being referred to Enforcement Agencies
- Number of cases where recovery is suspended due to arrangements being made.
- Number of cases with arrears outstanding at year end
- Amount of arrears outstanding monthly and at year end
- Number of complaints received where policy is not being followed.
- Bad Debt Provision (BDP) by service area, at least quarterly.
- Audit recommendations.

10. Other information

10.1 The council will train staff who advise the public & organizations on debt matters to be aware of the benefits, discounts, reliefs, and exemptions that may be applied to ensure that take-up is maximized.
10.2 Staff responsible for the recovery of debt will all complete the relevant Safeguarding awareness training as part of their induction and will have regular refresher training in accordance with council policy.
10.3 Staff will undertake other debt recovery training as part of their role to enable them to recognize vulnerability issues and their trigger points and identify ways to manage debt appropriately in these cases. Where necessary the council will assist vulnerable customers by discussing their case with an appropriate adult, where authority to discuss has been obtained.
10.4 The supporting documents relating to a demand/ invoice must be made readily available to Financial Services as and when requested. All documentation relating to a demand/ invoice will be kept either in paper or scanned image format in accordance with the services policy which is to hold supporting documents for a period of up to 6 years.

Appendix 1

Debt Recovery Processes by Debt Type

Type of Debt	Regulated Recovery process	1st Reminder	2nd Reminder	Final Demand
Sundry Debts	Dunning process	14 days after due date	30 days after due date	60 days after due date
Council Tax	Yes	7 days after due date If payment not made, a summons will be issued.	7 days after due date If payment not made, a summons will be issued.	Sent after 3rd instance of a missed payment. Right to instalments is lost; remaining balance is due in full. If payment is not made in full, a summons will be issued.
Business Rates	Yes	14 days after due date If payment not made, a summons will be issued.	Not issued	14 days after due date If payment not made, a summons will be issued.
Housing Rent	Yes	2-3 weeks in arrears	Pre-Notice of Seeking Possession (NSP) warning then NSP 4-6 weeks rent in arrears	N/A
Housing Benefit Overpayments	Yes	7 days after due date	Not issued	14 days after 1st reminder
Excess Charges	Yes	After 28 days of the penalty notice being raised the owners details are requested from the DVLA. Once the details are received a 1st reminder is sent out.	14 Days after the 1st reminder letter is sent	21 Days later notification of enforcement agent action is sent
Commercial Property Rent	Yes	7 days after due date	21 days after due date	21 days after due date (2nd reminder is final demand)

Leaseholder payments	Yes	14 days after due date	7-14 days after initial contact	Letter to lender, Application for determination of the debt in the First Tier Tribunal then a Forfeiture application.

If you need this information by email for use with the read-aloud function or in an alternative format, please contact us on **0344 980 4444** or visit **norwich.gov.uk/INTRAN**

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Equality Impact Assessment

Appendix Four

What is being assessed	Corporate Debt Management Policy	**Status**	First assessment of a new proposal
Officer completing	Tanya Bandekar	**Role**	Head of Revenues and Benefits
Team	Revenues and Benefits	**Directorate**	Resources
Senior leadership team sponsor	Alistair Rush	**Role**	Director of Finance (Sec 151)

What are the main aims or purpose of the policy, practice, service or function? *(include links to project briefs, cabinet reports etc)*

The Council aims to have a best-in-class debt recovery team and processes to ensure the Council maximises income, collecting debt promptly and effectively, whilst ensuring fair and equitable treatment for all our customers.

How does it fit with other services and policies, and how does it support our corporate objectives and City Vision?

The new Corporate Debt Management Policy supports the Council in its delivery of the 'Open and modern council' and 'Fairer Norwich' priorities within its Community-Led Plan.

The specific aims of the community-Led Plan which are supported by this policy are: 'A council delivering excellence' through efforts to ensure the council remains financially stable and 'tackling the root causes of disadvantage' through the offer of financial advice and support for individuals experiencing financial hardship and debt.

The strategic objectives of this policy are to:

• Maximise Debt Recovery: Ensure timely and efficient collection of all outstanding debts across service areas.

• Promote Financial Inclusion: Provide support mechanisms for individuals in financial hardship.

• Safeguard Public Resources: Minimise bad debt write-offs and protect public funds to sustain essential services.

• Enhance Public Trust: Ensure the process is transparent, equitable, and compliant with relevant regulations and standards.

What is the reason for the proposal or change (financial, legal etc)? *The Equality Act requires us to make this clear.*

The council is undertaking a Debt Project, which is looking at the way debt is being recovered currently, reviewing processes and procedures to ensure effectiveness, and will make recommendations for the future of debt collection at the end of the project. There is currently no Corporate Debt Management Policy covering both commercial and non-commercial debts, and teams largely manage debt themselves.

Who implements, carries out or delivers the policy, practice, service or function? *(person/team/body and other organisations who deliver under procurement or partnership arrangements)*

Officers collecting the following debt.

- Council Tax
- Business Rates
- Overpaid Housing Benefit
- Overpaid Council Tax Reduction
- Council Housing Rent, current and former tenants
- Rechargeable repairs and voids
- Residential Garage Rent
- Commercial Property Rent and Service Charges
- Leaseholder payments
- Planning CIL (Community Infrastructure Levy)
- Other sundry income debts (incl. licensing, halls and events, statutory notices, housing service charges, homeless prevention loans, garden waste collection etc.)
- Car parking excess charges
- Recovery of enforcement costs and civil penalties, including works in default
- Charging for discretionary services or any money due to the council under terms of an agreement to pay for goods, services, or property.

What outcomes do we want to achieve, why and for who?

The outcome focus will be the:

• Efficient collection of outstanding debts, preserving resources for delivering public services.

• Fair and compassionate treatment of residents and businesses.

• A sustainable financial position for the local authority.

Will anyone be disproportionately affected by the programme, and/or will it create any benefits? *(customers, employees, groups in the wider community etc)*

Any resident or business can be affected by debt, not just those with protected characteristics. The benefits will be that all service areas will work to the new Corporate Debt Strategy and Corporate Debt Management Policy which will deliver a more structured approach to debt for customers. Both will ensure that vulnerable debtors are treated sensitively and signposted to receive the best support as a result of the policies underpinning the strategy.

If yes, complete the relevant sections below for any benefits and adverse impacts identified.

Affected group	Key findings from analysis of data and evidence. Identify any gaps in data here	Level & type of impact: low/medium/high, positive/adverse	Justifiable if adverse	Actions to mitigate impacts, maximise benefits or address identified gaps in data	By when
Age	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Disability	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Gender reassignment	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Marriage and civil partnership	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Pregnancy and maternity	N/A	No specific impact identified	N/A	No specific impact identified	N/A

Race/ethnicity	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Religion and belief	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Sex/gender	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Sexual orientation	N/A	No specific impact identified	N/A	No specific impact identified	N/A
Other groups	Vulnerable customers, whether the vulnerability is temporary or permanent.	Medium	Not adverse	The Corporate Debt Management policy will address vulnerability, as will the new Vulnerability framework.	31/7/25

What evidence and data has been used for this assessment, including community engagement and consultation? *(include links to data sources, consultations etc)*

Consultation has taken place internally with all service areas and officers responsible for debt collection. A key learning point is to keep debt recovery high on the agenda as tackling debt early can lead to much better outcomes for customers. The strategy and policy are both intended to support officers in debt collection. It is intended to review both externally once they are embedded and any changes required can be addressed through these reviews.

Policy In Practice undertake regular webinars around debt. Their evidence suggests that more people are falling into debt with negative income, and this is an emerging challenge, however this would appear to be mostly working age rather than anyone with a protected characteristics. Debt advice agencies are also engaged to tackle debt earlier and regular communications with debtors will be key to the success of the strategy and policy.

How has the equality impact assessment informed or changed the proposal?

The Corporate Debt Management Policy has been developed alongside the EqIA to ensure that it is fair and equitable to all. This is a high level EqIA which will be revisited once the policy has had time to be embedded in service areas.

What actions have been identified going forward?

To review both the Strategy and Policy at a reasonable interval to ensure both are fit for purpose.

The EqIAs for both the Corporate Debt Strategy and Corporate Debt Management Policy will be revisited following successful implementation and again as both the strategy and policy are reviewed as outlined above.
How will the impact of your proposal and actions be measured moving forward? Feedback from debtors (held on Civica) Number of compliments (held on Civica) Number of complaints in service areas (held on Civica) and about Enforcement Agents (their records) Feedback will be used to ensure the current approach is suitable and is proactive towards the debtor's circumstances rather than reactive. Both the Strategy and Policies will be sense checked and can be revisited alongside any comments and suggestions from the Financial Inclusion Consortium and National Debt agencies/charities. Feedback will be gathered quarterly and reported at contract management meetings, SLT and at the Debt Board as appropriate.

Once complete, email to: strategy@norwich.gov.uk For the assessment to be final, the relevant people agreeing it must sign off this section

Officer completing assessment	**Tanya Bandekar**	**Date**	**14.02.25**
Senior leadership team sponsor	**Alistair Rush**	**Date**	**20.05.25**
Equality lead (strategy team)	**Joe Siggins**	**Date**	**19.02.25**

Appendix Five

NORWICH CITY COUNCIL VULNERABILITY FRAMEWORK

Owner: Independent Living Manager, Norwich City Council
Approval Level: Executive Leadership Team
Version: 1.0
Published Date: 16 June 2025
Review Period: Every three years
Review Date: 16 June 2028
Relevant Legislation/Regulation:

Version control

Date	Version no.	Reason	Author
	1.0	No previous framework published. This framework was developed to provide guidance for officers when supporting vulnerable residents and customers.	Senior Financial Inclusion Officer

Introduction

Norwich City Council is committed to supporting vulnerable residents and customers across the city. We want to assist customers to access our services and to help our vulnerable tenants to maintain their tenancies. Under the Fairer Norwich priority within our Community-Led Plan we are committed to support and empower people and families, reduce inequality and tackle poverty. The adoption of the socio-economic duty will mean that we will actively consider what more can be done to reduce the inequalities outcome caused by socio-economic disadvantage, in any strategic decision-making or policy development context.

This framework sets out the steps we will take to support this.

Purpose of this framework

The purpose of this framework is to:

- set out how we define vulnerability
- set out how we will identify vulnerable adults and record their needs
- provide clear information about how we will adapt our services to meet the needs of vulnerable customers
- ensure that we adopt a consistent approach to responding to any resident who is experiencing vulnerability to make sure that they have fair and equal access to our services
- set out how this framework will be monitored and reviewed

This framework supports our commitment to ensure any vulnerable customer is not at a disadvantage when accessing our services.

Scope of this framework

This framework sets out Norwich City Council's commitment to helping vulnerable customers to access services and manage debt. It details how we will identify vulnerable customers and how we will record this information.

The council is committed to providing holistic, wraparound support for vulnerable individuals and will deliver this through collaboration, both internally and with our partners. We are committed to supporting vulnerable individuals and ensuring that they have access to the services and support that they need and wherever possible, we will adapt to meet those needs.

This framework applies to all residents.

All officers will need to be familiar with this framework but it will be specifically relevant for housing and community safety teams, revenue and benefits services, frontline officers and income teams.

When appropriate we will work in collaboration with our partners to ensure that they work with us when developing services and delivering policies that may impact on vulnerable customers.

Defining Vulnerability

For the purpose of this framework, vulnerability refers to any individual who is, or may be in need of help or support, due to mental health difficulties, disability, age, illness or frailty. It also includes those who may be going through an exceptional life event and are temporarily unable to manage without additional support. We understand that we can all experience moments of vulnerability.

Within this framework, we define vulnerability as anyone who, due to their personal circumstances, experiences difficulties with everyday living and is susceptible to detriment that requires Norwich City Council or a partner to provide an enhanced level of support.

Examples of people who may have specific requirements include but are not limited to those who are experiencing:

- Health issues – physical disability, severe or long-term illness, hearing or visual impairment, mental health condition or disability, substance use, addiction, low mental capacity, or cognitive disability
- Life events – retirement, bereavement, income shock, relationship breakdown, domestic abuse, financial abuse, caring responsibilities, care leavers, those going through the asylum process
- Resilience challenges – inadequate or erratic income, over-indebtedness, low or no savings, low emotional resilience
- Capability issues – lack of financial education, poor literacy and numeracy skills, poor English language skills, learning difficulties, limited access to support, limited, or no access to online services

A person may be considered vulnerable due to a life event, like losing their job, or at multiple times, for example when experiencing a recurring mental health issue. Some residents may experience difficulties communicating with us because of a key characteristic for instance if English is not their first language. Some of these factors are a constant, while others, like bereavement, are temporary. The combination of these factors determines how vulnerable a person is at any given time and how much extra help they may need.

Signs of vulnerability

There are a number of signs that someone may be vulnerable. These may include, but are not limited to:

- Self-neglect, and/or hoarding
- Erratic payments or falling into arrears when there were no payment issues before
- Heightened stress levels due to difficult personal circumstances
- Increasing time pressures due to additional responsibilities
- Increasing pre-occupation ('brain is elsewhere') limiting their ability to manage
- Processing power and ability decreasing due to competing pressures, for example due to the side effects or emotional impact of receiving medical treatment
- Lack of perspective especially when experiencing something for the first time: being unable to see the 'bigger picture'
- Changing attitudes towards taking risks; people often become more 'reckless' and/ or careless when under stress.
- Falling into arrears with rent, council tax, or other payments
- Tenancy problems
- Failing to respond to correspondence, or telephone calls
- Avoiding contact with council officers or other professionals when they had previously engaged with them

Identifying vulnerability

When a resident or customer contacts us, we have an opportunity to identify whether they are vulnerable. A resident's vulnerability may be identified by:

- A residents or customers self-disclosure
- A record on internal systems
- Reviewing any support needs or vulnerabilities identified in a housing application form or other contact forms
- New tenant sign ups
- Home visits
- Information from relatives or other support networks
- Information from support agencies or external partners

We expect all officers to be aware of the possibility that a resident may be vulnerable either from information they receive or their own observations during routine work such as home visits and this information should be recorded accordingly.

Identification of vulnerabilities is not just at first contact but should be reviewed whenever contact is made as we know some vulnerabilities are temporary.

Recording Vulnerability

We will record any known vulnerability, particular communication or access needs, as well as whether there is anyone with authority to speak to us on the residents behalf, such as a care or support worker. This will make sure our officers have advance knowledge of any additional factors to consider when delivering services.

We will proactively check that we have the correct information recorded on our systems and will update this where information is missing or has changed.

Safeguarding adults and children at risk of harm is paramount and concerns will be raised in accordance with the Council's Safeguarding Policy which sets out how we identify and support vulnerable adults and children at risk, and ensure statutory agencies are involved immediately if we have a concern.

Signposting and referrals

When an officer identifies a resident as being vulnerable, they will seek to signpost or refer the person to appropriate support if it is needed. Some of the services signposted or referred to may include:

- Norwich early help hub
- INTERACT
- The Financial Inclusion Consortium (debt advice and welfare benefit services advocacy services)
- Norfolk Community Advice Network referral system
- Budget and money advice team (our tenants)
- Client Hardship Service (Norfolk County Council)
- Complex needs team (DWP)
- Adult Social Services (safeguarding)
- Domestic abuse services (NIDAS/DA champion)
- Police – where a person or persons are at serious risk of harm
- Norfolk Fire and Rescue if there are significant fire safety concerns in the home
- Other internal council teams e.g. tenancy management and / or environmental health if there are concerns regarding the overall safety within the home

Those who are caring for vulnerable people in a voluntary capacity, such as a partner or relative, may also need support and we will signpost carers to sources of support or advice whenever it is appropriate to do so.

Training

We will ensure that all relevant staff have training to raise their awareness of vulnerability issues, their impact on tenants and the assistance we can offer This will include:

- Induction and refresher training for all staff involved in the delivery of services in customer service and vulnerability issues, including safeguarding adults (also adult safeguarding) and children, PREVENT and domestic abuse awareness, so that they are equipped to deliver a quality service
- Ensuring that all staff are aware of this framework and have the skills and knowledge to implement it and its associated procedures
- Ensuring that officers have the right skills to recognise vulnerabilities and encourage disclosure
- Ensuring that officers understand how they can support vulnerable customers within their own service areas
- Ensuring that officers responsible for policy, procedure and guidance create these documents with due regard to the vulnerability framework

Related Policies and guidance

The following Norwich City Council policies provide further guidance for officers and should be referred to as required:

- Safeguarding Adults and Children policy
- Anti-social Behaviour Policy
- Tenancy Policy
- Corporate Debt Strategy (link to be added once approved)
- Corporate Debt Policy (link to be added once approved)
- Domestic Abuse Policy for residents
- Equality, Diversity and Inclusion policy

- Data protection policy
- Income Collection policy (council tenants) – currently under review (ready end of April)
- Home Options Allocations policy

The council's complex case safety planning template also provides prompts to help officers assess the risks and concerns regarding tenants and to develop a plan to reduce those risks.

Monitoring

The Council will monitor the impact and effectiveness of this vulnerability framework by ensuring adherence to the existing policies and procedures outlined above.

Feedback from the stakeholders outlined within this framework will be considered and where appropriate, incorporated to enhance the framework's effectiveness and ensure it meets the needs of vulnerable residents and customers.