

## Council Tax debt collection and low-income Londoners

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Report to the Greater London Authority (GLA)

Authors: Zoe Charlesworth, Director of Policy and Operations, Dr Benjamin Fell, Head of Research, Paul Howarth, Policy Consultant, Policy in Practice

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## Glossary

Administrative data	Data collected by government departments about their customary activities. Its function means it typically covers a large proportion of the real population and has greater granularity to open data, since it contains information at household level.
Breathing Space	A period during which an individual in problem debt is given respite from creditor action. This time is designed to give the space for the debtor to engage with debt advice and seek a sustainable solution to their debt. There will be a statutory requirement for councils to offer this to debtors with problem debts from May 2021.
Citizens Advice (CA)	A charity that seeks to assist citizens overcome problems particularly around low-income and debt.
Council Tax (CT)	The local taxation charge set by each local authority. The charge is dependent on the valuation band of the property and the charge set by the council for that property band.
Council Tax Reduction (CTR)	In England, this is a local award to help low-income residents with their council tax. The amount of support is determined by the local Council Tax Reduction Scheme set by each council.
Department for Work and Pensions (DWP)	A central government department which is responsible for welfare, pensions, and child maintenance policy.
Financial Conduct Authority (FCA)	An independent public body responsible for regulating the financial services industry.

Greater London Authority (GLA)	A democratically-elected strategic authority, comprising two distinct parts: the Mayor and the Assembly. It aims to create policies, actions and strategies that are in the interest of Londoners.
Income after Costs (IAC)	The net income after deduction of household bills. This measure considers household income (from earnings & benefits), 'unavoidable' costs (rent, council tax, costs of disability) and 'avoidable' costs (estimated household expenditure based on data from the Living Costs and Food Survey).
Index of Multiple Deprivation (IMD)	A measure of relative regional deprivation.
Local Council Tax Reduction Scheme	Council Tax Reduction Schemes in England are often called local schemes because each billing authority sets its own scheme. The generosity and nature of these schemes can vary significantly across boroughs.
Local Government Association (LGA)	The national membership body for local authorities which works on behalf of member councils to support, promote, and improve local government.
The Money and Pensions Service (MaPS)	An arm's-length body sponsored by the Department for Work and Pensions, established at the beginning of 2019, which engages with HM Treasury on policy matters relating to financial capability and debt advice.
Ministry of Housing, Communities, and Local Government (MHCLG)	The central government department with overall responsibility for policy on local government and housing.

Money Advice Trust	A national charity helping people across the UK to tackle their debts and manage their money wisely.
Ofgem	The government regulator for gas and electricity markets in Great Britain.
Single Housing Benefit Extract(s) (SHBE)	SHBE contains administrative data on households receiving Housing Benefit (HB). Policy in Practice also uses administrative data on households claiming Council Tax Support (CTR), including those claiming Universal Credit. In this report these are collectively referred to as Single Housing Benefit Extracts (SHBE).
StepChange	A charity that assists those with debt.
Universal Credit (UC)	An income-related (means-tested) benefit for people of working-age who are on a low income. It replaces four existing means-tested benefits, including Housing Benefit, and two tax credits.

## Key messages

- We could find no clear relationship between stricter council tax collection policies and higher council tax collection rates.
- Higher council tax collection rates are associated with the generosity of a borough's Council Tax Reduction Scheme and lower collection rates are associated with the level of poverty in the borough.
- The relative rigidity of the regulations and limitations to the IT systems can be overcome, enabling councils to pause recovery action for Council Tax Reduction recipients before the summons stage.
- More data-sharing would help move towards a more rounded, single view of household debt and would also help to identify the households who need most help, both now and in the future.
- In-year collection performance indicators are a barrier to more flexible approaches and different performance indicators should be considered.
- Seeking to recover the full council tax bill (rather than a missed instalment) significantly weakens financial resilience, more so if charges for enforcement action are added.

## Executive summary

The Greater London Authority (GLA) is interested in further understanding the council tax collection policies of London boroughs. This interest stems from the impact of collection policies on the lives of low-income Londoners and because collection of council tax is carried out by boroughs on behalf of the mayor's office.

Specifically, the GLA has commissioned Policy in Practice to undertake an evaluation of flexible, customer-centric debt collection practices for low-income Londoners. This project focuses on deepening the GLA's understanding of the business case for council tax collection practices that more effectively support low-income households.

Evidence from previous research undertaken by a variety of organisations shows that the handling of council tax arrears, and associated additional costs incurred in the collection process, can be the cause of extreme poverty or destitution, and may increase levels of problem debt. Some public authorities' collection practices have come under criticism as debts can sometimes be pursued without regard to individual circumstances and vulnerability.

Best practice in flexible, customer-centric collection is emerging with voluntary adoption of protocols, such as that devised by Citizens Advice and the Local Government Association, and individual councils are also developing their own approaches to collection from vulnerable citizens. This report collates the different collection processes across London and evaluates their impact on citizens and councils. It also provides the GLA with an understanding of barriers

to the adoption of more flexible policies and gives empirical evidence of the factors influencing collection rates.

This project was commissioned before the COVID-19 pandemic led to lockdown, and the subsequent impacts on the economy and on people's livelihoods. Recent evidence suggest that many more households have fallen behind with their council tax bills and that existing debts are getting worse. Visits by enforcement agents (bailiffs) were suspended during lockdown but they re-started from 23<sup>rd</sup> August 2020. This worsening situation makes the findings from this report even more pertinent.

## **Background**

In recent years, a number of advice and debt agencies have provided evidence that some practices for collecting council tax arrears from low-income households can exacerbate debt and poverty. The impact of debt-collection practices on low-income households has also been recognised across government. The government has introduced regulations to provide a breathing space for debtors (to commence in May 2021) and has formed the Cabinet Office Fairness Group to provide a cross-departmental lead on debt collection practices. In April 2019, MHCLG signalled an intention to engage with charities, debt-advice organisations, and local authorities, on changes to improve the current council tax collection system and evaluate the possibility of reform.

Some central government departments, such as DWP and HMRC, collect debt, and they can take an uncompromising approach to collection, falling behind best practices in regulated sectors like financial services. While the scope of this project focused on local government collection practices around council tax debt, some of the findings should be applicable more widely across government.

Debt collection practices of both local and central government are thought to fall behind those of the private sector. In the private sector, practices are now generally more customer-centric and take account of ability to pay. The introduction of the Treating Customers Fairly code ensures a customer-centric approach, with support where appropriate, and with fairness at the heart of recovery action.

There have been several attempts to define a set of criteria on public sector debt-collection practices that provide protection for low-income households. Adoption of these is voluntary and adoption has not been widespread. The most well-known is the protocol developed by Citizens Advice and the Local Government Association. However, only eight London boroughs have so far signed up to this protocol.

In light of this, the GLA wishes to further understand the debt-collection practices of London boroughs and the barriers to adopting customer-focused policies.

## **Research**

The research presented in the report is in four parts:

- Understanding local policies
- Determining existing barriers to more flexible collection policies
- Determining the extent to which collection rates can be attributed to collection policies
- Determining the impact of collection policies on low-income Londoners

The research uses mixed methodology. Current collection policies and barriers to change have been informed by a roundtable discussion with London boroughs, surveys and interviews with London boroughs, and supplementary desk research. This process was interrupted in early Spring 2020 by changing working practices as a consequence of the COVID-19 pandemic. As a result, there was more emphasis on desk research than originally envisaged. Data analysis was used to determine the extent to which collection rates are attributable to individual collection policies, and the impact of collection policies on low-income Londoners.

### **Key findings: council tax collection policies of London boroughs**

Although the collation of information on current policies was interrupted by the COVID-19 outbreak, there is sufficient information available to paint a broad picture of current collection policies:

- 67% of London boroughs explicitly state that they take account of vulnerability in determining action on collection of arrears.
- 82% of London boroughs take account of ability to pay in determining action on collection of arrears.
- 8 London boroughs had signed up to the Citizens Advice/Local Government Association voluntary protocol of good practice.
- All but one London boroughs use bailiffs as part of their enforcement activities.

Publicly available information on council tax debt collection rates did not show that those with more flexible policies had lower collection rates: London boroughs that explicitly stated that they consider vulnerability in collection and enforcement reported similar collection rates to those that did not consider vulnerability.

### **Key findings: barriers to more flexible collection and enforcement**

Local councils that engaged with this project identified key barriers to adoption of more flexible collection and enforcement policies and adherence to collection protocols:

- The term “ethical collection” was generally disliked as it implied that those not adopting these practices were acting unethically. A more neutral term was preferred (such as flexible, customer-centric policies).
- The need to maintain in-year collection rates puts pressure on councils to continue current enforcement practices and does not reflect cross-year payment arrangements.
- Data-sharing is needed to define vulnerability, but this is hindered by different IT systems, data protection, and the move to Universal Credit.

- IT systems built around the regulations mean that adoption of flexible policies prior to the summons stage can be problematic.

### **Key findings: the extent to which collection rates are attributable to collection policy**

Data analysis was used to separate out the impact of the main factors commonly deemed to influence collection rates: the nature of the local Council Tax Reduction Scheme (CTRS), the council tax charge, the level of poverty in the borough, and the type of collection policy. This provided an indication of whether the type of council tax collection policy (i.e. the degree of flexibility) affected collection rates. This analysis showed that the type of collection policy is not correlated with collection rates.

- Only CTRS generosity and local poverty levels were significantly associated with collection rates.
- Council tax rates and collection practices (as captured by adherence to the Citizens Advice and LGA Council Tax Protocol) were not significantly associated with collection rates.
- Boroughs with higher levels of relative deprivation tended to report lower council tax collection rates.
- Boroughs with higher maximum award levels for their Council Tax Reduction Schemes tended to report higher council tax collection rates.

### **Key findings: the impact of collection policies on low-income households**

Enforcement action against low-income households can result in further costs being added to their council tax debt. Generally, a household missing a payment has instalments withdrawn and is expected to pay the full amount for the year. Further enforcement action can lead to the addition of court and enforcement fees making the final debt many times higher than the original debt. The analysis sought to understand the proportion of households who would be unable to pay these increased debts compared to those who could pay if a more flexible option was available and the debt had been spread over a longer period.

- Dividing repayment of one month's council tax arrears across 12 subsequent months had an almost negligible impact on household financial vulnerability. Only 0.1% of households whose monthly income is currently higher than their legitimate expenditure would move into shortfall between income and expenditure as a result of the additional split payments.
- Requiring immediate full payment of council tax after a single missed instalment led to more than half (53%) of all households experiencing an income shortfall.
- Adding recovery and enforcement fees to this financial burden raised the percentage of households in financial shortfall to 83%.

## Recommendations

For councils, there is an understandable tension between supporting low-income households and maintaining council revenues. Promoting a change in council tax debt-collection policies can be supported by empirical evidence which demonstrates adoption of new approaches can be mutually beneficial to both the taxpayer and the council.

The councils that engaged with this research overwhelmingly supported flexible collection policies and had implemented a variety of practices to support vulnerable households. It was acknowledged that this may not be the case for all London boroughs. Even so, participating councils acknowledged that it is likely that all councils are focused on supporting residents and are also protective of their reputation. For councils that had not adopted more flexible collection policies there is likely to be both a fear that by doing so they risk lower collection rates, or there may be internal barriers that could be overcome through external support and empirical evidence.

Our research shows that collection policies can be fairer without an adverse effect on collection rates, and that support to low-income households across London can be improved.

The main recommendations from this research study are:

### Recommendations for the Greater London Authority

1. Help explain to boroughs the outcome of the research undertaken in this project:
  - a. Flexible, customer-centric policies can be just as effective as ‘harder’ enforcement policies, if not more so.
  - b. Different collection policies have a significant impact on a household’s ability to pay (and therefore the relative likelihood of debts being recovered).
2. Support (and lobby for) changes to the legislation to support more flexible collection policies, so that IT systems automatically reflect these changes, engaging as necessary with bodies such as the Cabinet Office who are looking at reforms to the way public debt is collected.
3. Using the breathing space initiative as an impetus for change, offering practical support to boroughs to help them overcome the barriers to more flexible collection policies. As a starting point, work with boroughs to ensure that a) costs are not added the debt, and b) all boroughs differentiate between those with CTR and those without as a first step in identifying those who may have problem debt.
4. Promote the Citizens Advice and LGA protocol as the most used in London and as a useful starting point for the adoption of good practice. It is still worthwhile encouraging London boroughs to sign up, particularly in the light of breathing space. It can be supplemented by other good practice actions which have been suggested.
5. Continue to lobby for further reasonable changes to the breathing space scheme, particularly the inclusion, in all cases, of the whole council tax bill in the statutory debt repayment plan.

6. Support those boroughs who are urging DWP to share more Universal Credit data so that households' financial vulnerability can be measured more accurately.
7. Lobby central government for changes to the key performance measures including:
  - a. Moving away from in-year collection and placing more emphasis on previous years' debt; and
  - b. Looking at the viability of introducing an indicator for the number of debt repayment plans.

### **Recommendations for London boroughs**

1. Adopt a policy of not adding costs to council tax debt for low-income households.
2. Adopt the practice in at least one borough of identifying CTR recipients in advance of the summons stage to allow them to seek debt advice and draw up a repayment plan.
3. Use the Standard Financial Statement as a means of assessing ability to pay.
4. Place more emphasis on allowing repayment of one instalment to be spread over 12 months as this is more affordable for those on low incomes and is more likely to have a positive outcome.
5. Share more data internally between departments to help move towards a more rounded, single view of household debt.
6. Ensure that Council Tax Reduction Schemes:
  - a. Are as generous as possible to support council tax collection;
  - b. Do not incorporate Universal Credit policies such as the two-child limit.
7. Consider the introduction of more customer-friendly contact hours for people in difficulty.
8. If not already done so, sign up for the Citizens Advice protocol for council tax debt collection, in advance of the breathing space initiative.

## Introduction

There is growing evidence that the collection of council tax arrears from low-income households across London can exacerbate poverty and increase levels of problem debt. Significant numbers of low-income Londoners are being referred to bailiffs or pursued through the courts for payment of council tax arrears and the cost of this action is added to their debt burden.

The GLA wishes to build an evidence base and business case for council tax collection policies that better protect low-income, vulnerable, and disadvantaged households. The GLA has commissioned Policy in Practice to:

- evaluate collection practices across London boroughs
- identify good practice
- understand the reasons for non-adoption of good practice
- develop an evidence base of the impact of flexible, customer-centric collection policies
- recommend approaches to the adoption of flexible, customer-centric collection policies

The objective of the research is to inform the formulation of a good-practice framework and provide the business case for a change towards practices that protect low-income Londoners.

This research is timely. Council tax debt is now becoming the most common debt problem seen by advice agencies. At the same time, collection practices within the public sector are falling behind those in the private sector and councils risk criticism for not treating vulnerable customers fairly. The Government's introduction of a "breathing space" provision in 2021 will necessitate a change in council's collection practices and an acceptance of the need for debtor segmentation.

For councils, there is a widespread tension between the wish to support low-income households and the need to protect their budgets. Councils may be resistant to adopting new practices where they believe collection rates could be compromised. This is understandable, given the reduction in council budgets in recent years and the ongoing challenges faced by many councils to fund frontline services. The key to promoting flexible collection practices lies in easing this tension by providing councils with empirical evidence which demonstrates that the adoption of new approaches can be mutually beneficial to both the taxpayer and the council.

This project was commissioned before the COVID-19 pandemic led to lockdown, and the subsequent impacts on the economy and on people's livelihoods. Recent evidence<sup>1</sup> from Citizens Advice, StepChange and the Money Advice Trust suggests that over 2 million households may have fallen behind with their council tax bills and that existing debts are getting worse. Visits by enforcement agents (bailiffs) were suspended during lockdown but re-started from 23<sup>rd</sup> August 2020. This makes the findings from this report even more pertinent.

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<sup>1</sup> [Action needed to prevent a council tax enforcement cliff-edge following coronavirus, StepChange, Citizens Advice and Money Advice Trust, 21<sup>st</sup> May 2020](#)

## Background to the research

London boroughs are not uniform. Council tax charges, support for vulnerable households, deprivation levels, and collection policies differ across councils. Differences in approach across boroughs mean that evaluating the impact of collection policy on collection rates is challenging.

### **Differences in liability for low-income households across London**

London boroughs set council tax rates and collect council tax from London's residents. Levels of council tax charged to residents vary significantly across London. As well as London boroughs having a wide range of underlying council tax levels, they have also taken different approaches to supporting low-income households through their local Council Tax Reduction Schemes (CTRS). In 2013, the Government ended the nationally set and funded Council Tax Benefit scheme and billing authorities were charged with designing their own support schemes. These schemes determine which vulnerable groups will be eligible to receive a reduced council tax bill, and the scale of the reduction that will be applied. At the same time, central government funding for council tax support was reduced by 10%. Since the introduction of local CTRS, funding to councils has reduced significantly. This reduction in funding has generally led to councils reducing the level of support provided to low-income residents.

Even though the general trend across London has been for less generous council tax support over time, the variety in the level of support differs greatly across councils. Some London boroughs have maintained the maximum support of the previous Council Tax Benefit scheme, set at 100% of liability, whilst others have reduced the maximum to 70% of liability. As a result, low-income households in otherwise equivalent situations, can be liable for quite different council tax sums depending on where they live in London.

### **The impact on low-income households**

There is growing evidence that practices for the collection of council tax arrears from low-income households can exacerbate debt and poverty. Research by the Joseph Rowntree Foundation on destitution in the UK<sup>2</sup> highlighted the role that uncoordinated debt collection practices by public authorities can play in leaving households with practically nothing to live on. Rent and council tax arrears were identified as two prominent causes of destitution. In addition, welfare advice agencies are seeing increased demand for advice on council tax arrears. Council tax arrears are now the most common debt problem presented to Citizens Advice<sup>3</sup>.

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<sup>2</sup> [Destitution in the UK 2018, Joseph Rowntree Foundation, June 2018](#)

<sup>3</sup> [Harsh collection methods adding half a billion pounds in fees to people's council tax debt, Citizens Advice, April 2019](#)

There is also evidence that significant numbers of low-income Londoners are being referred to bailiffs or pursued through the courts for non-payment of council tax arrears. Research published by the Child Poverty Action Group and Zaccheus 2000 Trust<sup>4</sup> found that in 2018-19:

- 19,367 council tax support claimants were referred to bailiffs, up from 16,444 in 2017/18.
- 76,475 council tax support claimants received a court summons, down from 89,929 in 2017/18.
- 103,168 council tax support claimants were in arrears, owing a total of £24.8 million in outstanding council tax. This compares with 100,798 claimants owing £18.2 million in 2017/18.

## **Calls for action**

MPs have criticised public authorities' collection practices. The Treasury Select Committee described the debt collection practices of some public authorities as 'worst in class'<sup>5</sup>. It found that debts are often pursued overzealously, uncompromisingly, and with routine recourse to bailiffs. It also cited evidence from debt charity, StepChange, that a third of its clients had council tax arrears averaging £1,000.

The Joseph Rowntree Foundation (JRF), the New Policy Institute (NPI), and the debt charity StepChange have made representations to the Mayor to act on problem debt and poor collection practices. In particular, they suggested that the GLA could influence public authorities in London to improve their practices.

The government has indicated a willingness to act. In 2016, the government established the Cabinet Office Fairness Group, bringing central and local government, the debt advice sector, and the debt collection industry together. The group developed Fairness Principles, in conjunction with the debt advice sector, which are aligned to FCA guidelines on Treating Customers Fairly.

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In May 2019, the Fairness Group reiterated support for the Fairness Principles and stated:

*“People owe debt to the Government for a variety of reasons. Government takes seriously its responsibility to ensure that those people who can pay, do so on time, whilst providing proportionate support to vulnerable people and those in financial hardship”*

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In April 2019, MHCLG signalled an intention to engage with charities, debt advice organisations and local authorities on changes to improve the current council tax collection system and

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<sup>4</sup> [Still Too Poor to Pay, Council Tax Support in London 2018-19 briefing, Child Poverty Action Group and Zaccheus 2000 Trust, March 2020](#)

<sup>5</sup> [Household finances: income, saving and debt, House of Commons Treasury Committee, July 2018](#)

evaluate the possibility of reform<sup>6</sup>. The objective was to create a ‘fairer, more efficient and compassionate debt recovery system.’

Some government departments, such as DWP and HMRC, collect debt and evidence to the Treasury Select Committee<sup>7</sup> indicates that they tend to take an uncompromising approach to collection, falling behind best practices in regulated sectors like financial services. The recent call for evidence by the Cabinet Office<sup>8</sup> states that “there remain concerns about some central and local government organisation debt management practices.” A full account of the issues around central government debt recovery can be found in a recent briefing from the House of Commons research department.<sup>9</sup>

While the scope of this project focused on local government collection practices around council tax debt, the findings should be applicable more widely across government.

### **Comparison to practices in the private sector**

Since 2014, the government has made changes to regulate debt within the private sector. Practice in this sector is generally now more customer-centric than in parts of the public sector.

In 2014, the government transformed the regulation of the consumer credit sector through the transfer of accountability from the Office of Fair Trading to the Financial Conduct Authority (FCA). FCA rules require consumer credit firms to assess the customer’s creditworthiness and treat debtors in a considerate and proportional manner. Practices must incorporate TCF (treating customers fairly) policies throughout the business processes. Staff must be trained in the TCF process and this must be evidenced.

The code clearly provides a customer-centric approach, with support where appropriate, and with fairness at the heart of recovery action.

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The code<sup>10</sup> states that:

*“When dealing with customers in default or in arrears difficulties a firm should pay due regard to its obligations under Principle 6 (Customers’ interests) to treat its customers fairly.”*

*“If a customer is in default or in arrears difficulties, the firm should, where appropriate (a) inform the customer that free and impartial debt advice is available from not-for-profit debt advice bodies; and (b) refer the customer to a not-for-profit debt advice body.”*

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<sup>6</sup> [Government pledges to improve the way council tax debt is recovered, MHCLG, April 2019](#)

<sup>7</sup> [Household finances: income, saving and debt, House of Commons Treasury Committee, July 2018](#), page 18, paragraph 49

<sup>8</sup> [Fairness in government debt management, a call for evidence, Cabinet Office, 29<sup>th</sup> June 2020](#)

<sup>9</sup> [Debts to public bodies - are government debt collection practices outdated](#), House of Commons Library, 15<sup>th</sup> September 2020

<sup>10</sup> [Financial Conduct Authority handbook, 21<sup>st</sup> March 2016](#)

Transformation of the private sector debt practices was followed by a voluntary code of practice in 2015 for the water sector<sup>11</sup>. This aimed to align sector practices with those of the FCA. This was followed in 2017 by the issue of enforcement guidelines by Ofgem<sup>12</sup>.

Both the emphasis on proportionality and fairness introduced by the FCA, and sector-wide codes used by the utility companies, are in stark contrast to the wide variety of council tax recovery policies implemented by London boroughs.

## **The introduction of “Breathing Space” provision**

From May 2021, councils will be required to introduce the government’s “Breathing Space” initiative for those with problem debt. The aim of the scheme is to give people with problem debt the opportunity to take control of their finances and to arrive at a sustainable repayment plan. The scheme will cover a broad range of debts including arrears owed to central and local government, including council tax debts and arrears.

There are two key strands to this initiative:

- The introduction of a sixty-day breathing space during which individuals will be protected from enforcement action from creditors and interest on debts will be frozen. Most individuals entering breathing space must engage with professional debt advisers during this period.
- A statutory debt repayment plan which will enable someone in problem debt to enter a statutory agreement to repay their debts within a manageable timetable. Individuals entering a plan would receive legal protections from creditor action for the duration of their plan.

There is additional provision for those with mental health issues: where an individual is receiving NHS treatment for a mental health crisis the breathing space provision will last for the whole of their treatment and they will not need to seek debt advice during this period.

The Government had two key aims in introducing breathing space:<sup>13</sup>

- Encouraging people to access timely debt advice. Research<sup>14</sup> commissioned by the Money Advice Service (now the Money and Pensions Service) showed the importance of this. The research showed that once an individual receives debt advice, debt is less likely to increase, and creditors receive higher repayments.
- Protecting debtors from creditor action allows debtors the time and space to engage with professional debt advisers to identify a sustainable solution.

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<sup>11</sup> [Dealing with household customers in debt – guidelines, Ofwat, 1<sup>st</sup> September 2015](#)

<sup>12</sup> [Enforcement guidelines, Ofgem, October 2017](#)

<sup>13</sup> [Breathing space scheme: response to policy proposal, HM Treasury, June 2019](#)

<sup>14</sup> Independent Review of the Funding of Debt Advice, Peter Wyman, January 2018. Available to download from [Money Advice Trust](#)

Breathing space is expected to assist both debtors and creditors. The government's own impact assessment<sup>15</sup> estimates that it will help over 700,000 people across the UK get professional help in its first year, increasing to over 1 million a year by the 10th year. The government also estimates that creditors will receive over £400m in extra repayments in the first year, as people are supported in sticking with realistic repayment plans.

The government intends to introduce specific rules for council tax debt that take account of the cessation of monthly payments for those in arrears. It was proposed in the consultation that if an individual entered breathing space before payment of the full outstanding annual bill had been requested, only the outstanding monthly arrears would be included in the protections. However, if an individual had already been served with a notice requiring payment of the full council tax bill when they entered breathing space, then the whole of the amount contained in that notice would be included in the protections.

Both local authorities and debt charities have suggested that the full council tax bill should be included in the statutory debt repayment plan under the breathing space protections. As Citizens Advice argued: 'this would ensure that people would benefit from protection from enforcement action and are able to make repayments towards council tax debts in affordable instalments'.<sup>16</sup> However, the government has decided to stick with its original proposal. The GLA may wish to consider further opportunities to lobby for this change, for example, as the draft [Debt Respite Scheme \(Breathing Space Moratorium and Mental Health Crisis Moratorium\) \(England and Wales\) Regulations 2020](#) are considered in Parliament.

Many of those with council tax arrears have multiple debts and long-term debts. This means they may be classified as having "problem debt" and so eligible for consideration of breathing space provision. The Citizens Advice report, Hidden Debt, found that "unlike unsecured consumer credit debt, household bill debt is almost always problematic. People falling behind on household bills is an indicator of severe financial distress - they're the last things people stop paying."<sup>17</sup>

London boroughs will therefore need to plan for the introduction of breathing space and fit this within their wider collection and enforcement strategies. As well as planning for administrative processes, such as the communication portal with the Insolvency Service, who will be administering breathing space, they will need to consider their role in assessing suitability for breathing space and when and how this will be carried out. This process will necessitate a customer-centric approach that is inherent in more flexible collection policies.

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<sup>15</sup> [Breathing Space impact assessment, HM Treasury, February 2020](#)

<sup>16</sup> [Breathing Space scheme – response to HM Treasury's consultation on a policy proposal, Citizens Advice, January 2019](#) page 32

<sup>17</sup> [Hidden Debts The growing problem of being behind on bills and in debt to the government, Citizens Advice, August 2018](#)

## Emerging models of best practice

There have been several attempts to define a set of criteria on collection practices that provide protection for low-income households. Adoption of these is voluntary and has had limited success.

Citizens Advice and the Local Government Association have published a council tax protocol<sup>18</sup> that councils can sign up to. The protocol suggests actions that signatories can consider adopting, including fifteen concerning recovery processes. Generally, these are written in non-committal terms, but encourage signatories to consider a number of issues, including:

- Working with enforcement and advice agencies on the promotion of debt advice
- Clear communication and signposting
- Using the Standard Financial Statement when calculating repayment plans
- Offering flexible payment arrangements to residents
- The appropriate use of enforcement agents when households are in receipt of LCTR
- Publishing their policy on residents in vulnerable circumstances

There are currently 60 local authorities signed up to the protocol nationwide, including eight London boroughs. The GLA has consistently encouraged boroughs to sign up to the protocol in its responses to borough consultations on changes to CTR schemes. It is the only protocol widely known and accepted and it reflects the close working between London boroughs and their local Citizens Advice Bureau. Although the protocol is perhaps couched in over-diplomatic terms, it is still worthwhile encouraging London boroughs to sign up, particularly in the light of breathing space. It can be supplemented by other good practice actions which have been suggested.

The 'Stop the Knock' campaign<sup>19</sup>, established by the Money Advice Trust, relates to local authority collection activity beyond just council tax, and suggests a smaller set of six actions:

- Make a clear public commitment to reduce the use of bailiffs over time
- Review signposting to free debt advice, including phone/online channels
- Adopt the Standard Financial Statement (SFS) to objectively assess affordability
- Put in place a formal policy covering residents in vulnerable circumstances
- Exempt LCTR recipients from bailiff action
- Sign the Citizens Advice/LGA council tax protocol

The Money and Pensions Service has also published guidance<sup>20</sup> on a more progressive approach to the recovery of council tax arrears. The guidance aims to support local authorities

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<sup>18</sup> [Council Tax Protocol, Citizens Advice and Local Government Association, June 2017](#)

<sup>19</sup> [Stop the knock - an update on local authority debt collection practices in England and Wales, Money Advice Trust, September 2019](#)

<sup>20</sup> [Supportive council tax recovery, Money Advice and Pensions Service, December 2018](#)

to achieve fairer outcomes, improved resident engagement, and sustainable arrears payments through greater collaboration with debt advice agencies. Specific measures include:

- The use of a pre-enforcement checklist to create fair and consistent approaches to the use of enforcement
- A more consistent approach to the assessment of affordability by aligning all internal affordability processes with the Standard Financial Statement
- The targeting of specific resident cohorts for debt advice intervention

London boroughs have adopted their own specific policies, many of which contain provision specifically for low-income households. However, the non-committal nature of flexible, customer-centric debt collection guidelines means that different local authorities vary in the specific practices that are put in place. Nevertheless, they share a commitment to move away from 'hard' collection practices such as the use of bailiffs and heavy-handed warnings. The range of flexible practices implemented is exemplified by Croydon and Hammersmith and Fulham.

Croydon's 'Income and Debt Transformation project', which began in 2017, ambitiously set out to embed more flexible debt collection practices throughout their approach. In addition to using engagement and collection processes that foster sustainable payment plans, Croydon set out to work in partnership with local organisations and take into account insights from behavioural specialists. By 2017/18, the council had reached record debt collection rates for council tax, business rates, sundry debt and Housing Benefit overpayments together with a 42% increase in digital payments and a 21% reduction in court summons due to non-payment.

In April 2018, Hammersmith and Fulham (H&F) announced an end to bailiff action. This represented a drive towards applying Financial Conduct Authority standards, which the public sector has been slow to pick up on despite its success in the private sector. H&F have subsequently reported an increase in council tax debt collection.

Earlier, softer, approaches to debt collection were also considered successful and assisted 763 residents, generating £798,000 more income for the council. There is limited evidence of results, but Intrum, H&F's partner in the initiative, reported a total of £18.2 million of arrears debts being placed (since July 2017), and £3 million returned to the "public purse" from H&F and their ventures with other councils.

The above examples of flexible, customer-centric practice have not been subject to formal evaluations available to the general public. Figures are reported by councils in news releases or blogs without a clearly transparent methodology. Hence, successful results can appear anecdotal and crucially do not identify contextual factors that serve to enable - or indeed present obstacles - for successful more flexible practices. This makes it more difficult for councils that want to develop their own flexible, customer-centric collection strategy and limits evidence-led change.

## Methodology and activities

Although some London boroughs have introduced individual initiatives reflecting more flexible collection policies, there is still a widespread view among boroughs that what is seen as greater leniency in dealing with vulnerable residents will inevitably lead to lower collection rates. It may assist boroughs to understand more fully the impact of policies that take account of vulnerability in order for them to evaluate their own collection practices.

In order to understand the impact of collection policies on collection rates, those policies need to be isolated from the other key drivers of differences in collections rates between councils - namely, the level of the council tax charge, the nature of the CTR scheme, and the level of poverty within a borough.

Our approach to this research attempts to isolate the impact of collection policy. It then attempts to evaluate policies in terms of their flexible, customer-centric nature, and finally to link this with the isolated collection rates. This will provide a deeper understanding of collection policy on collection rates.

### **Understanding local policies**

The first research objective is to understand current collection practices across London and, in particular, gain a fuller understanding of the prevalence and scope of flexible collection policies.

The examination of current practices was primarily carried out through a questionnaire to all London boroughs, interviews, and a roundtable discussion. This process was interrupted by the introduction of alternative business working practices due to COVID-19 from February 2020. As a result of this, work within councils was focused on supporting residents and reacting to the changed economic conditions. Prior to this a roundtable had been held and six surveys from councils had been submitted. Given that the priorities of councils had rightly shifted to protecting those impacted by Coronavirus, and with the agreement of the GLA, the outstanding survey responses were not collected. Instead, supplementary desk research was carried out in order to provide a broad picture of debt collection practices across London.

### **Determining existing barriers to implementation of good practice**

Through literature review, roundtable discussion and the submitted surveys, the research evaluated existing barriers and resistance to flexible collection practices, including adoption of (or barriers to adopting) codes of good practice and preparation for breathing space. This provided a qualitative understanding of the barriers to the adoption of more flexible practices and an evaluation of preparedness for breathing space and, the barriers to adopting its provisions.

## **Determining the extent to which collection rates can be attributed to collection policy**

This research attempts to develop a metric to account for the impact of external drivers on collection rates, such as the nature of the local CTR scheme, the council tax charge, and local demographics. In order to do this, the research used publicly available data for each borough on council tax rates, CTR schemes, and financial resilience.

## **Determining the impact of collection policies on low-income Londoners**

In order to determine the impact of collection policies on low-income Londoners this research examined the household-level impact of fees and charges on financial resilience, and the subsequent ability to pay future charges. This analysis was based on an existing repository of household-level administrative benefits data for 17 London boroughs.

## Part 1: Understanding local policies

Policy in Practice hosted a roundtable for London boroughs in February 2020 to further understand local collection policies, the drivers behind change, and the attitude towards more flexible collection policies.

The understanding derived from the roundtable was to be supplemented by a survey of London boroughs. However, due to the impact of COVID-19 measures in Spring 2020, survey responses were limited. Given the pressures on councils to implement responses to COVID-19, it was decided to not pursue collection of the additional surveys. However, desk research provided supplementary information on current collection policies across London. It is worth noting that survey results are, in part, self-selecting. Those councils who feel they have flexible collection policies may see fewer barriers to sharing their practice. As such, the limited survey results may not present a picture of collection across London. Nevertheless, the results are provided below.

### **Vulnerability**

All 6 responding councils, and all those attending the roundtable, stated that they considered vulnerability throughout the collection process. 80% of respondents stated that they change collection policies if they believe the debtor is vulnerable and all of these were using the Citizens Advice/LGA Good Practice protocol as a guide to vulnerability.

In some cases, special arrangements are built into the process. At least one borough allows an additional two months for CTR recipients to settle their account before a summons is issued. This is to allow time for a payment from the council's discretionary hardship scheme to be considered.

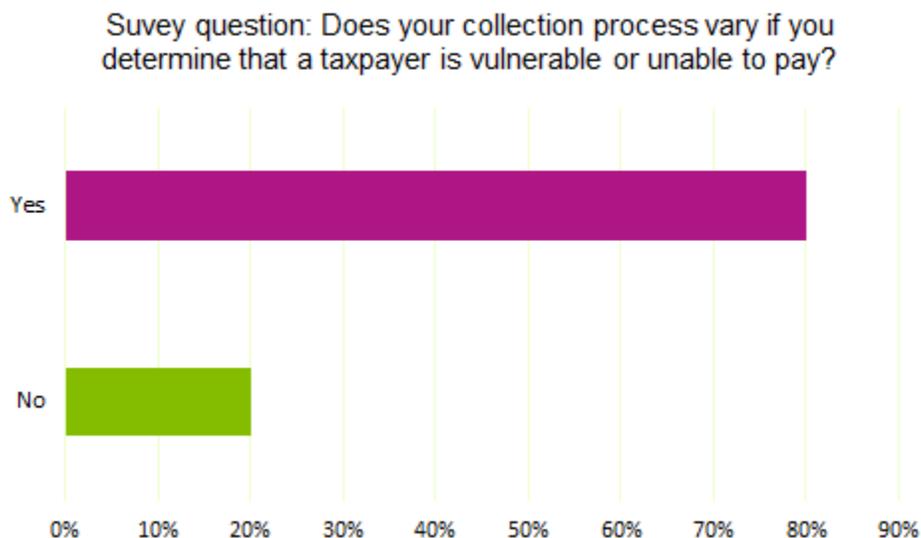
However, the automated collection processes, which are determined partially by the IT system adherence to regulation, mean that, in general, vulnerability is only considered routinely at post-summons stage. All respondents said that vulnerability would be considered if this was brought to the attention of the council at an earlier stage, but this was not automatic.

Desk research of the collection policies for all London boroughs indicated that 67% made explicit mention of vulnerable groups whilst 33% do not explicitly mention different practices for vulnerable groups. These figures should be viewed with caution as some councils may have separate policies around vulnerability but do not publicise them. At the roundtable, the risk of publicising separate policies for vulnerable groups was mentioned by several authorities. The stated risk was that some customers would state that they were in vulnerable groups simply with the aim of delaying or preventing enforcement.

A couple of respondents mentioned the use of data to understand vulnerability, but the general pattern appeared to be identification through use of the debtor's council tax history. One council has introduced cross-departmental data-sharing around vulnerability to create a whole picture of household vulnerability and debt. This is clearly good practice. Policy in Practice has worked

with the Cabinet Office on the evaluation of a pilot project under the Reimagine Debt programme which tested proactive, preventative, and holistic approaches to managing debt. Although small-scale, the evaluation of work undertaken by the London borough of Barking and Dagenham showed that arrears of council tax and rent fell by £1216.00 per household.

**Figure 1: Flexibility of policy based on vulnerability**



Where vulnerability is identified, councils use a variety of methods to amend processes for these clients. Examples of differing practices in relation to vulnerable claimants include:

- The use of a breathing space
- Referral for CTR
- Referral for income maximisation
- Referral to organisations that assist with debt (e.g. StepChange and Citizens Advice)
- Longer-term arrangements for repayment
- Using enforcement agencies with dedicated welfare teams
- Waiver of enforcement costs
- Attachment of benefits rather than bailiff action

Alternative routes to repayment tend to be outside the standard, automated processes. This means that they are generally manual and allow councils to apply a number of remedies based on individual circumstances. However, the volume of cases involved made it difficult for most boroughs to intervene routinely before the liability order stage.

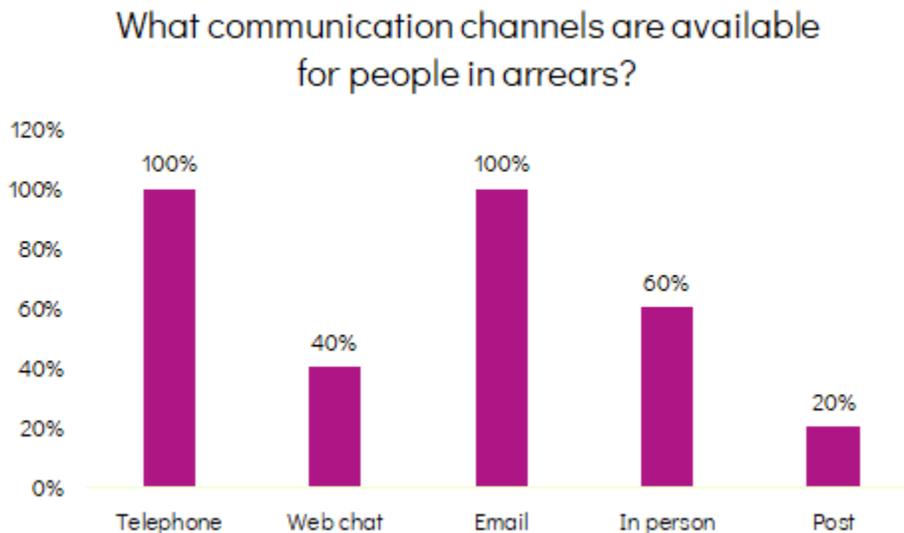
### **Payment options**

All respondents offer alternative ways to pay. All provide options to pay through credit cards, direct debit, cash, or post office accounts. Alternative ways to pay include PayPoint and cheque.

## Advice and communication

The respondents use a variety of methods of communicating with customers. However, it was notable that both telephone and email are the most usual options. Text messaging was not mentioned as an option by respondents, though it is used by some boroughs.

**Figure 2: Communication channels used by London Boroughs**



60% of respondents provide facilities for debtors to contact them outside standard working hours but this was limited to online or email contact. None of the respondents provide face-to-face or telephone access outside working hours.

All respondents stated that they signpost towards support throughout the debt recovery process. The most mentioned agency was StepChange for debt advice, followed by Citizens Advice. The high prevalence of external signposting was confirmed by the desk research which showed all London boroughs had simple-to-locate signposting to debt advice through their websites.

For the two councils that had introduced a breathing space provision, engagement with a debt agency and development of a repayment plan were an integral part of the process.

The responses regarding advice and communication indicate a high level of flexibility within local authorities, with the exception of customer-friendly contact hours.

## Collection

If a council tax payment has been missed, and still not paid within seven days of the resident receiving a reminder or a final demand, councils may apply to the Magistrates Court for a summons to be issued, stating the full amount owed. At this time, the Council can also apply to the Magistrates Court for a liability order which gives the council legal power to collect the debt. All respondents followed this pattern but 2 of the respondents said that the liability order is only

pursued if there has been no response to attempts to make contact following the issue of the summons. These councils felt that contact at this stage could prevent escalation of action and the associated costs to the debtor. Where fees are incurred, through summons, court, liability order, or bailiff action, all councils apply these fees to the debt.

All the councils attempt to prevent debts getting to the stage of a summons being issued. If contact can be made, then most carry out affordability assessments and try to make revised arrangements to pay. However, only one council looks at debt across the council to build up a council-wide picture of household debt. Other respondents stated that they would take additional debts into account if the debtor raised the issue, but they did not actively join up debts across the council. Desk research across all London boroughs showed that 82% of boroughs explicitly stated that they consider ability to pay in deciding appropriate collection and enforcement.

All survey respondents segregate CTR and non-CTR cases, following the granting of a liability order by magistrates. The general pattern is that, for those in receipt of CTR, collection post-liability order is outside enforcement action. The most common method of collection is through attachment of earnings or benefits.

For those not identified as vulnerable, or in receipt of CTR, all the survey respondents use enforcement following the issue of a summons. 40% use internal enforcement teams. The drive towards internal enforcement was poor performance of external agencies. The councils that use internal enforcement commented that this gave them greater flexibility over the enforcement process and eased identification and response to vulnerability.

Desk research showed that all London boroughs apart from Hammersmith and Fulham use internal or external enforcement (bailiff) action.

## **Breathing Space**

Half of the respondents do not have a breathing space policy. Those who do generally offer about 60 days grace in which enforcement action is suspended for the debtor to seek debt advice and draw up a repayment plan. One council specifically refers those going into breathing space to their discretionary support scheme.

The respondents were not yet preparing for the introduction next year of a statutory breathing space as they were awaiting final regulations. In particular, they wanted to know whether the council itself could be an independent adviser and refer its own debtors to breathing space. The response to breathing space will be determined by regulation, which will in turn determine the necessary IT provision for implementation and the flexibility available to councils.

There is a concern that current debt advisers (CA/StepChange) will not have the capacity to offer breathing space. Several of the councils that took part in this project would like to offer this internally (perhaps co-located at Citizens Advice) but this would need additional funding, possibly through proposals for retention of a percentage of the debt recovered.

## Relationship with local Council Tax Reduction Schemes

The councils that engaged with this project felt it was important to include the impact of the local Council Tax Reduction Scheme as a driver for council tax debt. All councils reiterated the need to maximise CTR uptake and join-up scheme design and collection practices. Some of the methods of joining-up these services are to:

- Use the flag that is sent to the council from DWP indicating that a person is in receipt of Universal Credit as an automatic trigger to award CTR. This prevents the need for residents to complete a further form to apply for CTR. This enables all those in receipt of Universal Credit to be provided with support and ensures there is no gap in support between receipt of the UC flag, and the start of the CTR award. (There is a separate issue about following UC policies for these applicants which is considered below).
- Provide council tax reduction based on 100% maximum liability. At the moment, there are differences across London, with some councils awarding support based on 100% liability, and the least generous schemes providing support based on 70% liability. Residents of areas with less generous schemes will need to pay council tax from their means-tested benefit awards. It is worth noting that these awards have been frozen for 4 years whilst council tax charges have continued to rise.
- Introduce scheme change to allow backdating of awards. This will ensure that debts do not arise due to lack of understanding of the application process.

On a separate point, boroughs can ensure that Universal Credit policies such as the two-child limit and the Minimum Income Floor are not carried forward to their CTR scheme. The default position is that a CTR scheme uses Universal Credit calculations in determining CTR for those receiving Universal Credit. But councils have the freedom to vary their schemes for working-age applicants, so they don't need to do this. We suggest all boroughs review their CTR policies for applicants receiving Universal Credit.

### Drivers for scheme design

Responses to the reason for the shape of the current collection policies, and policy change can be grouped into three main areas: political will, the performance of external agencies, and the council's reputation.

#### Political will

Participants felt strongly that change can only be delivered with political will and leadership. For example, in Hackney the current policy was driven by the Mayor and elected members. The collection policy has moved away from the emphasis on 100% in-year collection and towards individual ability to pay. In Southwark, the new mayor has given priority to a customer-focused

approach to all council business. This has led to a re-examination of all council processes. The outcome is an individual examination of debt before passing to enforcement<sup>21</sup>.

### **Poor performance of external agencies**

Poor performance of external agencies was also a driver towards more flexible enforcement policies (cited by Hackney and Hounslow). In Southwark, the low collection rate achieved by external agencies allowed services to be brought in-house. With in-house teams, the council has used internally held data to segregate claimants and identify appropriate enforcement routes.

### **Reputation of the Council**

Respondents felt that the reputation of the council was an important consideration in scheme design. The councils mentioned the need “to be seen on the side of the debtor” and “to be human”.

### **Relationship of policies to collection rates**

Desk research showed that 27 (82%) of London boroughs considered the ability to pay in collection, and so could be considered to have flexible collection policies. This left 6 (18%) of London boroughs that did not explicitly state that they considered the ability to pay.

There is little difference in collection rates between those with flexible policies and those without.

### **Summary**

The survey of all London boroughs and follow-up interviews was not as detailed as originally envisaged due to restrictions caused by the COVID-19 outbreak. This limited the understanding of current practices. In addition, the self-selecting nature of attendance at the roundtable and early survey return, means that only a partial picture is available of collection policies across London.

Nevertheless, the information from councils that did engage with the project provided some interesting insights.

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<sup>21</sup> [Step by step - working together to manage your debts, London borough of Southwark website, September 2020](#)

## Key findings

- At least some councils in London provide flexible policies and attempts are made to segregate debt collection practices. Segregation is primarily based on receipt of CTR which is used as a proxy for vulnerability, but the segregation generally takes place after a liability order has been issued.
- Councils are generally flexible in their methods of contact with debtors but text messaging, which has been used successfully by the DWP to contact claimants, is not widely used. In addition, there is little flexibility in the hours that a debtor can contact the council by phone or in person.
- Enforcement action varies with vulnerability. Councils try to ensure that those who cannot pay are not forced down the standard enforcement route, thus protecting them from fees and charges. However, this may occur if the debtor chooses not to engage with the council. Customer engagement was key to ensuring alternative payment processes were implemented.
- Data is not used widely in the identification of vulnerable claimants. Only one council routinely shared data across council departments to build a whole household view of debt.
- The councils that already provide a type of breathing space will find the move to statutory breathing space less problematic than those that do not currently provide this service. However, councils are not preparing for statutory introduction until regulations are agreed in Parliament as this will determine whether the councils can provide the debt advice service. Councils' preparation of processes to accommodate breathing space will be partly determined by the IT providers' response to the regulatory framework.
- Examination of collection of council tax debts needs to be joined up with the development of CTR schemes. Less generous schemes can lead to inability to pay and drive up debt amongst the poorest residents. Under Universal Credit, councils can use the information from DWP to automatically award CTR. Councils felt that this practice should be more widespread. Councils can also ensure that Universal Credit policies such as the two-child limit are not imported into their CTR schemes.
- Political leadership is key to a change in policy towards a more customer-focused approach. Councils are also concerned about their reputation and this can drive change.
- There is little difference in collection rates between those with flexible policies and those without.

## Part 2: Determining existing barriers to better practice

The councils that engaged with this project did tend to segregate debtors from other customers and were, in general, customer-focused. The majority of respondents (80%) were also already signed up to the Citizens Advice protocols. This meant that discussions on barriers to implementation of good practice were focused on how to improve current practices, in other words, how to move towards better practice. The councils involved in the project also provided an insight into why other councils may not follow similar practices. The interruption of the qualitative research due to COVID-19 meant that direct engagement with councils that currently may not meet good practice guidelines was not possible. These councils may have provided an alternative insight into the barriers to a more flexible approach.

The key barriers to development of collection practices, identified by those attending the roundtable, are shown below.

### **Terminology**

Councils felt the term “ethical collection” presumes that current practices are not ethical and can therefore be seen as misleading. They also stated that “ethical collection” felt like a current fad. As such, even those who operated customer-focused collection policies felt this terminology is a barrier to engagement. One council stated that, as all councils collect within the legal framework, they are ethical. A more neutral term (e.g. flexible repayment/collection) was preferred.

### **In-year collection as a performance measure**

All Councils mentioned in-year collection as a key performance indicator. This is seen as one of the key indicators by both elected members and the public. As long as this remains a key performance indicator, there will be reluctance to risk slippage. The move to a more flexible system will potentially introduce this risk. The councils that engaged with this project would like to see a move to indicators that include previous years’ debt. If previous years’ debt is not included in the key indicator, there is little pressure on councils to move towards a more flexible approach with repayment plans crossing financial years. As performance indicators and targets, tend to drive behaviour, it may also be helpful to explore the viability of a new performance indicator for the number of repayment plans in place.

### **Need for data**

In order to understand vulnerability, and so inform collection segregation, councils require data on debtor households. Councils stated that barriers to data-sharing hindered segregation. Several councils are developing a cross-council view of debt and are considering or have implemented appropriate data-sharing across relevant departments. For example, Newham has conducted a review of debt management across the council. See the annex for more detail. This could be a useful case-study for those councils who are looking to do something similar.

Other councils that engaged with this project said they were hindered in this approach by the numerous IT systems holding data and the legislation around data-sharing.

Access to data from the DWP is particularly difficult with the move to Universal Credit as councils hold less data on low-income households than under the legacy benefit systems. In order to facilitate segregation, councils require full understanding of household vulnerabilities. This could be achieved with greater sharing of data with DWP and internally with health services. Up to now, the DWP has appeared reluctant to share further data unless a specific reason can be identified. There may be a role for the GLA in putting the case for further data-sharing to the DWP.

### **Inflexible IT systems built around regulation**

Current practices are somewhat determined by legislation as the IT systems used to administer collection adhere strictly to regulation. The relevant provisions of the legislation in the The Council Tax (Administration and Enforcement) Regulations 1992 (and amendments) set out procedures for reminder notices in the event of failure to pay by instalments and then outline arrangements for court action and ensuing enforcement measures. There is no mention of debt advice nor the desirability of repayment plans.

This stymies the ability of councils to act outside the standard collection routes. Any amendment to IT systems on an individual basis would be very expensive. Councils also mentioned that the need to build processes around the IT provision would determine how they responded to breathing space.

### **Key findings**

- Using the right terminology to describe collection practices is important to encourage engagement
- Use of in-year collection as a key performance indicator does not encourage adoption of a more flexible approach to repayment plans that may span different financial years
- Barriers to data sharing in councils hinder understanding of vulnerability though there are notable exceptions of councils who have successfully overcome these. In addition, councils need access to Universal Credit data, held by DWP, to understand the fullest picture possible of vulnerability.
- To some extent council processes are determined by IT systems, leaving little room for adaptation of collection practices

## Part 3: Determining the extent to which collection rates are attributable to collection policy

### Modelling and data

#### Modelling the impact of collection practices using public data

Data on council tax collection rates is publicly available for every local authority in England, Scotland, and Wales. Specifically, MHCLG provides (for England and Wales) public tables on the amount of council tax collected by each local authority during the financial year, expressed as a percentage of the amount of council tax due. For the financial year 2018/19, this data is available for 313 local authorities. This data, alongside other publicly reported statistics (see below) was used to explore the factors contributing to collection rates.

#### Collection practices

Some national data is available on the adoption of flexible customer-centric collection practices via the Council Tax Protocol developed by Citizens Advice in partnership with the Local Government Association.<sup>22</sup> The protocol includes template procedures for flexible, customer-centric collection, including criteria such as offering flexible payment arrangements and avoiding the use of enforcement agents. At the time of writing, 61 councils have signed up to the protocol, of which 56 were identifiable within the public datasets described above.<sup>23</sup>

Collection practices are one of several factors that may affect council tax collection rates. To isolate any effect of collection practices, other influential factors need to be quantified and controlled for. This analysis examined the impact of the three key factors; the level of council tax, the local Council Tax Reduction Scheme, and levels of poverty.

#### Council tax rates

As the most direct determinant of council tax costs for households in each borough, the cost of council tax is expected to affect collection rates. However, the direction of the effect is harder to predict. It may be that a higher level of council tax causes a reduction in collection rates because fewer households are able to meet their payments. Alternatively, it may be that higher rates are associated with more affluent resident populations. If only relatively affluent households can afford to live in a given local authority, their council tax collection rates are likely to be high.

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<sup>22</sup> [Council Tax Protocol, Citizens Advice and Local Government Association, June 2017](#)

<sup>23</sup> Due to changes in local authority boundaries, mergers etc. since the publication of the signatory list.

In order to capture the cost of council tax, we made use of public data on the average Band D rate paid by households in every local authority in England, Scotland, and Wales for 2018/19. This data was available for 313 local authorities.

### **Council Tax Reduction Scheme**

Local Council Tax Reduction Schemes allow local authorities to reduce council tax costs for their low-income households. Where CTR schemes are more generous, households that are less able to pay tend to be required to pay less. As such, we would expect local authorities with more generous schemes to see higher collection rates.

Policy in Practice holds scheme details for all local authorities in the UK. This data was used to understand the impact of CTR schemes.

### **Relative deprivation**

In addition to factors relating to the tax itself (rates and level of reduction offered through CTR), council tax collection rates are likely to be affected by the financial capacity of the local population. Local authorities with relatively less affluent populations would be expected to have lower collection rates, as fewer households will have the level of income (and income stability) needed to maintain payments.

Public data on the level of relative deprivation (using the Index of Multiple Deprivation - IMD) was used to understand the impact of poverty on collection rates.

### **Which factors affect collection rates?**

A multiple regression model is used to determine how the factors listed above relate to council tax collection rates. Each predictor variable is added to the model in turn, but only those that show a statistically significant association with the outcome variable are kept for the final model.

Following this approach, we found that only financial resilience (IMD) and the local Council Tax Reduction Scheme were significantly associated with local authority's council tax collection rates.

As expected, local authorities with higher levels of relative deprivation tended to report lower council tax collection rates.<sup>24</sup> Local authorities with higher maximum CTR awards tended to report higher council tax collection rates.<sup>25</sup> Together, these two predictors accounted for 73% of the variance in collection rates.<sup>26</sup> Neither the level of council tax nor adherence to the Citizens Advice council tax protocol significantly improved the amount of variance in collection rates accounted for by the model.

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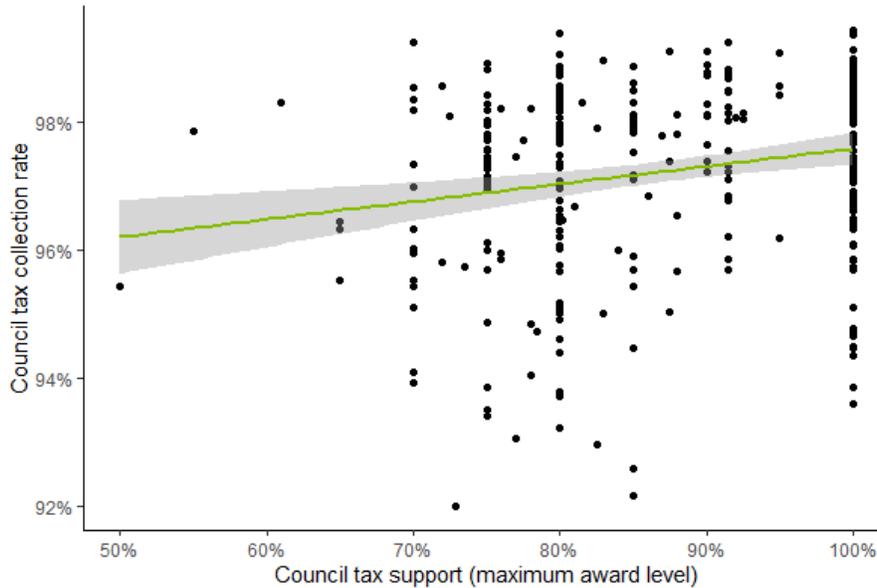
<sup>24</sup>  $b = -.002, SE = .001, p < .001$

<sup>25</sup>  $b = 0.016, SE = .004, p < .001$

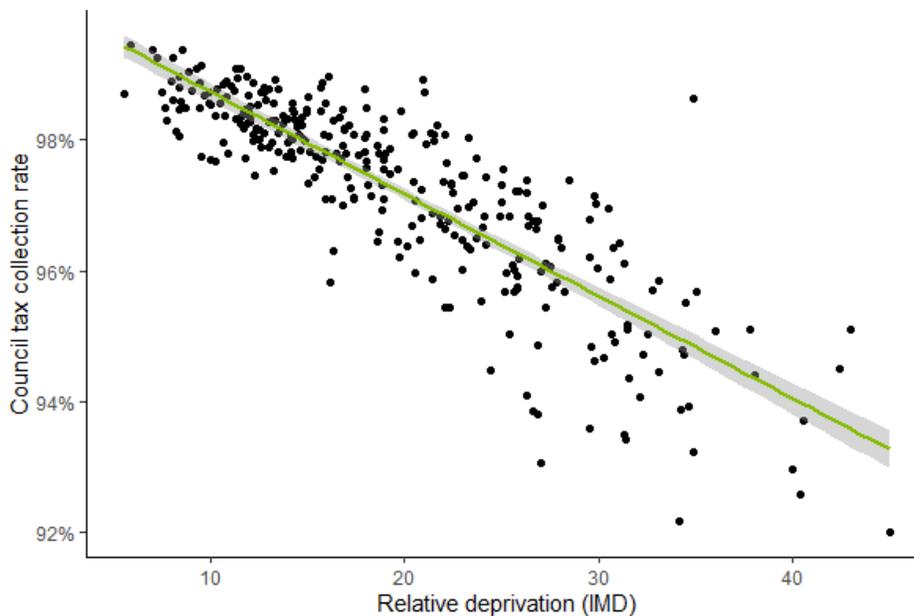
<sup>26</sup> Adjusted  $R^2 = 0.73, F(2,308) = 422.64, p < .001$

This analysis suggests that adherence to flexible, customer-centric collection practices (at least those specified in the Citizens Advice protocol) does not alter collection rates. In this model, by far the most influential factor on collection rates was a local authority's level of relative deprivation. More generous CTR schemes were associated with significantly higher collection rates. However, this effect was relatively small - every 1% increase in maximum CTR award level was associated with a 0.02% increase in collection rates.

**Figure 4: Council tax support and collection rates**



**Figure 5: Relative deprivation and collection rates**



## **The relationship between court summonses and bailiff usage on collection rates**

Data on court summonses issued, and bailiff visits undertaken, by local authorities in Great Britain are not routinely gathered. It is therefore difficult to develop a robust method for testing the association between these practices and overall collection rates.

However, in 2015 Child Poverty Action Group and Zacchaeus 2000 Trust published a report on the impact of CTR schemes in London which included surveyed data on the use of bailiffs and court summonses. The report was updated in 2019.

Using this data, we attempted to plot bailiff/summons rates against public data on council tax collection rates from the same financial year. Unfortunately, the sample size proved too small to support statistical tests of the correlations, and we found no clear trend association between council tax collection rates and the use of court summonses or bailiffs. However, these data do provide an illustration of how such analysis could be applied if collection practices were more routinely documented, and they do appear to back up our previous findings that collection practices have little bearing of collection rates

### **Key findings**

- Only Council Tax Reduction Scheme generosity and local poverty levels are significantly associated with collection rates.
- Council tax rates and collection practices (as captured by adherence to the Citizens Advice/LGA Council Tax Protocol) were not significantly associated with collection rates.
- Local authorities with higher levels of relative deprivation tended to report lower council tax collections rates.
- Local authorities with higher maximum award levels for their CTR schemes tended to report higher council tax collection rates.

## Part 4: Modelling the impact on households of collection practices

Policy in Practice's secure repository of household-level administrative benefits data was used to model the impact of different collection practices on household income. Policy in Practice processes administrative benefits data for local authorities across the UK, including 17 London boroughs. These datasets capture all households in each local authority in receipt of Housing Benefit or CTR, and include a wealth of demographic, social and economic information about the household. Policy in Practice processes administrative benefits datasets on behalf of local authorities as part of our Low-Income Family Tracker analytics platform and CTR modelling services. These services help local authorities to identify vulnerable households, target interventions and support, track household financial trajectories over time, and carry out strategic planning around discretionary funding programmes such as CTR and DHPs.

A key element of Policy in Practice's analytics service is the in-house measure of financial resilience. This measure considers household income (from earnings & benefits), 'unavoidable' costs (rent, council tax, costs of disability) and 'avoidable' costs (estimated household expenditure based on data from the Living Costs and Food Survey). Using this metric, local authorities can identify households whose costs exceed their income. Such households are at greater risk of falling into debt or may be forced to reduce their expenditure on household costs such as food or utilities to make ends meet.

This income after costs (IAC) measure of financial resilience was used to estimate the capacity of low-income households in 17 London boroughs to manage different council tax debt collection practices. A number of collection scenarios were modelled to explore the impact of different approaches to debt recovery. In each case, modelling assumed a missed council tax payment and then included different costs of collection added to the debt. In practice, the addition of collection costs will depend on the collection policy of the council. This modelling provides an understanding of the impact of collection policies on household finances.

The collection practices modelled were as follows:

### **Split payment plan**

In this scenario, the council does not go down the enforcement route and does not automatically add the full bill to the debt. Instead, it divides the single missed payment over the household's next 12 monthly payments. Each month's council tax bill therefore increases by 1/12th of the monthly amount.

### **Immediate full recovery**

In this scenario, the missed payment triggers the full bill to be added to the debt. The household's next month's council tax bill therefore equals the full annual amount.

## **Immediate full recovery + enforcement costs**

In this scenario, the household is required to pay the full annual amount, but in addition is billed for the costs of enforcement. Specifically, the visiting costs (£75) and court fees (£280). These costs are applied to the next council tax bill alongside the full year's council tax amount.

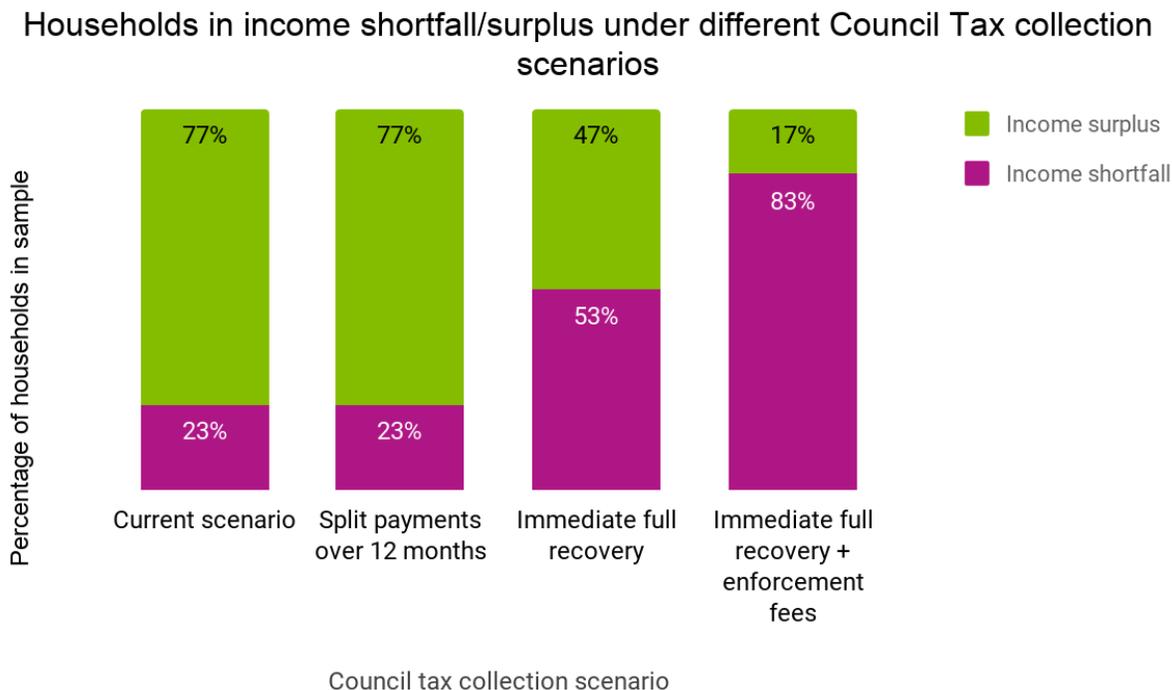
## **Impact of collection practices on households**

For each scenario, the household's income after costs for the month following a missed council tax payment was calculated. These adjusted IAC scores were compared to a baseline scenario in which no payment was missed (i.e., the household paid their normal monthly council tax bill).

The results of this analysis were as follows:

- Across the 17 London boroughs for whom data was available, 77.4% of households had income above their costs under the baseline scenario.
- When the split payment plan scenario was applied, the number of households with income above their costs dropped by only 0.1%. That is, only 0.1% of households would no longer be able to maintain an income surplus if their missed council tax payment were split across 12 subsequent payments. For context, this 0.1% represents 271 households out of the total sample of 176,066.
- When the immediate full recovery scenario was applied, the number of households with income above their costs dropped to 52.7%. That is, an additional 25% of the sample would no longer be able to make ends meet if they had their full year's council tax bill applied as a single payment.
- When enforcement costs were applied on top of the full annual council tax bill, the number of households with income above their costs dropped to only 17.1%. This means that an additional 60% of households who were making ends meet, would no longer be able to do so under this collection practice scenario.

**Figure 6: Impact of collection policies on financial resilience**



### Key findings

- Dividing repayment of one month's council tax arrears across 12 subsequent months had an almost negligible impact on financial vulnerability. Only 0.1% of households in a monthly income surplus would move into shortfall as a result of the additional split payments.
- Requiring immediate full payment of council tax after a single missed instalment led to more than half (53%) of all households experiencing an income shortfall.
- Adding recovery and enforcement fees to this financial burden raised the percentage of households in financial shortfall to 83%.

## Conclusion and recommendations for GLA promotion of good practice

The impetus for an examination of council tax collection practices across London springs from a growing understanding of the impact of council tax collection policies on low-income households. Research from several advice and debt charities (given elsewhere in this report) provides a cumulative picture of how the council tax collection process can be the cause of extreme poverty or destitution and may increase levels of problem debt. The acknowledgement of the potential negative impacts of council tax collection practices has recently gathered momentum across government; the Treasury Select Committee described the debt collection practices of some public authorities as ‘worst in class’. And, in 2016, the government established the Cabinet Office Fairness Group, bringing central and local government, the debt advice sector, and the debt collection industry together. The group developed Fairness Principles, in conjunction with the debt advice sector, which are aligned to FCA guidelines on Treating Customers Fairly.

In light of the acknowledgement of the problem across the debt and advice sectors, and across government, the GLA is examining how public authorities in London can adapt their practices.

For councils, there is an understandable tension between the wish to support low-income households and the need to protect budgets. The key to promoting more flexible collection practices lies in easing this tension by providing councils with empirical evidence which shows that the adoption of new approaches can be mutually beneficial for both the taxpayer and the council.

The councils that engaged with this research overwhelmingly supported flexible collection practices and had implemented a variety of practices to support vulnerable households. It was acknowledged that this may not be the case for all London boroughs. Even so, participating councils acknowledged that it is likely that all councils are focused on supporting residents whilst being protective of their reputation. For councils that had not adopted more flexible collection practices there is likely to be both a fear that by doing so they risk lower collection rates, or there may be internal barriers. These could, however, be overcome through external support and empirical evidence.

The GLA wishes to promote council tax collection practices that more effectively support low-income households. The key findings that may inform the promotion of good practice are shown below.

### **Use different terminology**

The councils that took part in this project recommended that in promoting good practice, the term “ethical collection” should be avoided. Using this term is seen as accusatory as there is a presumption that current practices are not ethical. This terminology discounts the objective of councils to support residents. A more neutral term, such as flexible, customer-centric collection policies, is advised and has been used throughout this document.

## **Provide clarity of the role of policy in determining collection rates**

The data analysis from this project shows that collection policy is not the key determinant of collection rates.

- Average collection rates across London for those that explicitly offered different debt collection routes for vulnerable customers, were slightly higher than for those that did not offer flexible policies.
- Across the UK, collection practices (as captured by adherence to the Citizens Advice/ LGA Council Tax Protocol) were not significantly associated with collection rates.

Changing policy to be more flexible is therefore highly unlikely to impact adversely on collection rates.

## **Ensure that Council Tax Reduction Schemes are designed to support council tax collection**

Our data analysis showed a correlation between Council Tax Reduction Schemes and collection rates. Local authorities with higher maximum award levels for their CTR schemes tended to report higher council tax collection rates. The generosity of the CTR scheme is more important in determining collection rates than the collection policy.

In London, CTR schemes vary significantly. The most generous schemes provide support based on 100% of council tax liability. The least generous provide support based on 70% of liability. If residents that are reliant on means-tested benefits are required to pay a substantial sum towards council tax, this is paid from their personal allowance. The means-tested personal allowance was set at a time when Council Tax Benefit was based on 100% of liability and was not increased to take account of these additional payments. A reduction in the generosity of financial support for council tax has occurred at the same time as benefit rates have been frozen. For many residents, payment of this additional amount is not possible and will inevitably result in the accumulation of arrears.

London boroughs are likely to find that increasing the generosity of the Council Tax Reduction Scheme will support collection rates more so than a non-flexible collection policy. It is also open to councils to mitigate the impact of Universal Credit policies such as the two-child limit in their CTR schemes.

## **Provide clarity on a household's ability to pay**

There is little point in councils expanding collection resources if the household does not have the ability to pay. If enforcement practices do not take account of ability to pay, the addition of costs can make the debt unrecoverable. Flexible policies whereby the debt is spread over future months may enable the same debt to be recoverable in full.

- Across London Boroughs, spread of debt over 12 months meant less than 1% of households no longer had the resources to pay.
- Full bill recovery meant that 53% of low-income Londoners no longer had the resources to pay.
- Addition of enforcement costs meant 83% of low-income Londoners no longer had the resources to pay.

Where councils recovered missed payments through demands for the full bill, or through enforcement action that resulted in additional costs, the majority of households would not have the ability to pay. In effect, these arrears would need to be written off or covered by discretionary support. For low-income households, flexible repayment practices support collection rates.

### **Move away from in-year collection as the key performance measure**

All Councils that engaged in this project mentioned in-year collection as a key performance indicator for the council. This measure is seen as an indicator of not only the ability to collect local taxes but also as a measure of the council's efficiency and performance overall. As such, it is highly protected. Introduction of flexible policies risks this measure in two ways; firstly, introduction of any change will have an unknown impact. Secondly, spreading repayments over several years means that these collections are not part of in-year collection figures and do not feed into performance figures.

The councils that engaged with this project would like to see a move to indicators that include previous years' debt. If previous years' collection was included in a key performance statistic there may be more of an impetus to introduce flexible repayment terms. There is also an opportunity to explore the viability of a new performance indicator based on the number of repayment plans in place.

### **Ease barriers to data-sharing**

In order to understand vulnerability, and so inform segregation of debtors and alternative approaches, councils require data on debtor households. Councils identified numerous barriers to this including:

- Data-sharing between departments, primarily due to interpretations of data protection legislation.
- Data-sharing with other organisations with insights into vulnerability (e.g. the NHS) again due to data protection legislation.
- Different IT systems meaning that data is stored in different ways. Bridging these different systems and creating a single view of a household is problematic.

DWP is sharing less household data as households move to Universal Credit. Under Universal Credit, councils have access to only basic household information compared to the data for

legacy benefits which they could access. They also collected their own data as administrators of Housing Benefit which is no longer available.

The issues around data-sharing, particularly internally, are not insurmountable. Some councils, including Newham and Southwark, are working to overcome internal barriers to develop a single view of household debt. A case-study from Newham is included as an annex to this report. Another council, Barking and Dagenham, has developed a more holistic approach as part of the Reimagine Debt programme.

Councils are also working together to request further data from external agencies. The GLA may wish to explore this further.

### **Support more flexible IT systems built around regulation**

Current practices are somewhat determined by legislation as the IT systems used to administer collection adhere strictly to regulation. This is a barrier to councils to providing more flexible policies. Given the high level of arrears within a council, initial stages of collection and enforcement are likely to always need some level of automation. However, this means that cases may not be viewed individually until after a liability order has been issued.

Councils were of the view that, if flexible policies were bound by regulation, the IT suppliers would need to create the required level of automation whilst taking account of more flexible requirements. This is likely to occur with the introduction of breathing space and may occur if the recent government interest in council tax enforcement results in a new regulatory framework.

### **Make the most of existing protocols**

Most councils that took part in this research had signed up to the Citizens Advice/Local Government Association Council Tax protocol. However, across London only eight London Boroughs have done so. Councils stated that there is no advantage to a council to sign up to the protocol even if they already meet protocol requirements. It may be that the regulatory framework needs to be in place first, prior to protocol support. As the Citizens Advice/LGA protocol is the most used in London, it may be worthwhile using it as the basis for development of more flexible policies.

### **Use Breathing Space as an impetus for change**

From 2021, councils will be required to introduce the Government's breathing space initiative for those with problem debt. The aim of the scheme is to give people with problem debt the opportunity to take control of their finances and to arrive at a sustainable repayment plan. IT systems and collection processes will need to be adapted to take account of the new regulatory framework. This need for change could potentially provide the impetus for other changes towards flexible policies.

This research noted a general agreement amongst London boroughs that took part in the project of the need to take account of individual circumstances in council tax arrears collection. Even so, there are barriers to the implementation of better practices, even for those councils that are committed to change. These barriers are not insurmountable, and this is evidenced by the type of practices adopted by some London boroughs to support vulnerable households. The GLA can take a lead in helping London boroughs overcome the barriers identified in this research. Finally, the London boroughs that took part in this project all mentioned that buy-in from council leaders was the impetus and driver of change. It may be that this is where attention should be focused.

Our research shows that collection policies can be fairer without an adverse effect on collection rates, and that support to low-income households across London can be improved.

## **Summary of recommendations**

### **Recommendations for the Greater London Authority**

1. Help explain the outcome of the research undertaken in this project to boroughs:
  - a. Flexible, customer-centric policies can be just as effective as 'harder' enforcement policies, if not more so.
  - b. Different collection policies have a significant impact on a household's ability to pay (and therefore the relative likelihood of debts being recovered).
2. Support (and lobby for) changes to the legislation to support more flexible collection policies, so that IT systems automatically reflect these changes, engaging as necessary with bodies such as the Cabinet Office who are looking at reforms to the way public debt is collected.
3. Using the breathing space initiative as an impetus for change, offering practical support to boroughs to help them overcome the barriers to more flexible collection policies. As a starting point, work with boroughs to ensure that a) costs are not added the debt, and b) all boroughs differentiate between those with CTR and those without as a first step in identifying those who may have problem debt.
4. Promote the Citizens Advice and LGA protocol as the most used in London and as a useful starting point for the adoption of good practice. It is still worthwhile encouraging London boroughs to sign up, particularly in the light of breathing space. It can be supplemented by other good practice actions which have been suggested.
5. Continue to lobby for further reasonable changes to the breathing space scheme, particularly the inclusion, in all cases, of the whole council tax bill in the statutory debt repayment plan.
6. Support those boroughs who are urging DWP to share more Universal Credit data so that households' financial vulnerability can be measured more accurately.
7. Lobby central government for changes to the key performance measures including:
  - a. moving away from in-year collection and placing more emphasis on previous years' debt; and

- b. looking at the viability of introducing an indicator for the number of debt repayment plans.

### **Recommendations for London boroughs**

1. Adopt a policy of not adding costs to council tax debt for low-income households.
2. Adopt the practice in at least one borough of identifying CTR recipients in advance of the summons stage to allow them to seek debt advice and draw up a repayment plan.
3. Use the Standard Financial Statement as a means of assessing ability to pay.
4. Place more emphasis on allowing repayment of one instalment to be spread over 12 months as this is more affordable for those on low incomes and is more likely to have a positive outcome.
5. Share more data internally between departments to help move towards a more rounded, single view of household debt.
6. Ensure that Council Tax Reduction Schemes:
  - a. Are as generous as possible to support council tax collection;
  - b. Do not incorporate Universal Credit policies such as the two-child limit.
7. Consider the introduction of more customer-friendly contact hours for people in difficulty.
8. If not already done so, sign up for the Citizens Advice protocol for council tax debt collection, in advance of the breathing space initiative.

## Annex: London Borough of Newham case study on collection in a post-COVID world

The London Borough of Newham, its management team and cabinet members have made debt management a corporate priority and are exploring new ways of managing debt across the council.

The council's continuous improvement team started work around a year ago to investigate how debt is currently collected, and what improvements could be made. The review is timely because the council stopped all debt collection activity due to COVID-19, and there is now an opportunity to look afresh at working methods as debt collection is re-introduced.

The first step of the review involved detailed end-to-end process mapping of each area of the council where debt is collected. All parts of the council with an interest were fully involved in the study. In common with most councils, each department has its own policies and processes and there is no overall place where debt is managed or reported to, and no consistent central place for learning and good practice.

This first stage of the review led to several important lessons that resonate with other local authorities:

- **Consideration of overall debt collection aims.** It is important to consider trade-offs between, for example, bringing in as much money as possible and supporting a healthy, vibrant community.
- **A greater appreciation of the customer experience.** With a range of different vulnerability criteria, payment methods, communications and enforcement policies, it is easy to lose sight of how this impacts on an individual household, particularly where there are multiple debts.
- **A recognition that more needs to be done to profile and segment customers, and target support measures.** It is also important to understand more about how debt increases demand on other council services.
- **Councils need a better understanding of overall household debt levels and the total financial impact of debt on the council.** There are high levels of debt in the borough, with an estimated one in four adults over-indebted, yet information on who is over-indebted is not readily available or collected regularly. This information is an essential starting point for a holistic approach to collections.

Having discussed their findings within the council, they are now going to take forward work in three key areas:

- **A council-wide debt policy.** The team will look at what needs to happen to make this work in practice. This will include a review of their overall debt collection aims, and efforts to decide upon a hierarchy of debt.

- **Better use of data.** This can help with the customer segmentation process to understand the different customer groups and therefore what the most appropriate and effective debt management solutions would be. Services may be better able to manage the needs of resident/customer based on greater information on circumstance with clear parameters. Ideally, making smarter use of data should help identify warning signs, and so allow the council to give help to people before their debt escalates or even begins.
- **A cross-service pilot.** This will involve drawing up a single view of resident debt, adopting common definitions of what constitutes vulnerability, and signposting people to the most appropriate means of support. For those with high, multiple debts this could include referral to MoneyWorks, an innovative in-house service that provides a range of free and confidential money, debt and benefits advice. The focus is on a person's or household's whole circumstance, and as such it provides support to boost income whilst also using tools such as the Standard Financial Statement to manage repayment based on what people can manage and afford.

Newham has very clear values and priorities for community wealth building that focus on a 'fair and inclusive Newham' and building an inclusive economy. The focus on debt management is an important step within this journey.

In Newham, the corporate team is focusing work on cross-council co-ordination on certain key areas such as debt management. There is a lot more work to do but there is a growing appreciation across the council that a cross-cutting approach can be highly effective.

## Contact

Zoe Charlesworth, Head of Policy, Policy in Practice  
[zoe@policyinpractice.co.uk](mailto:zoe@policyinpractice.co.uk)

Dr Benjamin Fell, Head of Analysis, Policy in Practice  
[ben@policyinpractice.co.uk](mailto:ben@policyinpractice.co.uk)

Paul Howarth, Policy Consultant, Policy in Practice  
[paul@policyinpractice.co.uk](mailto:paul@policyinpractice.co.uk)

Company number: 07042993

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0330 088 9242

[hello@policyinpractice.co.uk](mailto:hello@policyinpractice.co.uk)

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