

# Pendle Council & Liberata

## Vulnerable Persons Policy: Debt Recovery

We recognise that certain groups of customers may be more vulnerable than others. Whilst not all customers in such groups may be vulnerable, we will consider customer's individual circumstances where a potential vulnerability is identified.

The groups more likely to be vulnerable may include, but are not restricted to:

- Recent care leavers
- Pregnant women or recent parents within a month of giving birth
- Those with a serious long term medical condition, illness or are frail
- The elderly
- Those with a low literacy or numeracy capability skills
- Those with a physical disability
- People with learning difficulties, or mental health problems
- People experiencing recent bereavement
- Those experiencing severe financial difficulties and/or have recently experienced a change in their financial circumstances
- Customers with communication difficulties
- Customers with a history of alcohol or drug misuse
- Victims of domestic violence
- Non-digital customers
- Armed forces Veterans

We recognise that certain debt recovery options may not be appropriate where a customer is identified as vulnerable. Where we are aware that a person may be vulnerable we will adapt our debt recovery and collection procedure accordingly to minimise any hardship or distress.

## What we will do

When dealing with vulnerable customers we will adopt key principles that our officers will adhere to:

- We will attempt to identify vulnerable customers at every stage of our debt recovery process. If identified at a later stage, recovery action will be reviewed.
- We will review the personal circumstances of our identified vulnerable customers before taking any debt recovery action.
- Should a vulnerable customer be identified as in receipt of Income Support, Job Seekers Allowance Employment Support Allowance or Pension Credit, we may consider for their debt to be paid by deductions from their benefit rather than the use of enforcement agents, to avoid extra debt being incurred.
- Prior to taking bankruptcy action against a customer we will take pro-active action to contact Lancashire County Council to identify whether the customer is known to Social Services

- We will direct our customers to Citizens Advice Bureau for debt advice early on in the debt recovery process and refer to other sources of advice / support at the request of the customer
- We will monitor our complaints procedure to identify any trends.
- Our enforcement agents will be obliged under contract to advise Liberata of any customers they identify as possibly being vulnerable.
- Our enforcement agents will provide the debtor with the Customer Services contact number and email should they wish to speak to Liberata.
- Liberata's contract with our enforcement agents will insist that they maintain a vulnerable persons and safe guarding policy.
- Upon agreed conditions, and in exceptional circumstances, we will offer an up to 6 weeks hold on enforcement action for vulnerable customers when they first seek debt advice from an accredited advice provider.
- Should there be a communication issue we will follow our 'Communications with all our Customers' policy
- We will maintain a specific complaint procedure for customers unhappy with the conduct of enforcement agents if the matter hasn't been resolved directly by them..
- We will monitor our enforcement agents, and meet regularly with them to review their practices.
- We will regularly meet with advice agencies in order to discuss practical ways to assist vulnerable customers.
- We will work with the individual and advice agencies to agree repayment schedules that are affordable.
- We will publicise debt advice contact details with our literature.
- If known, we will consider a customer's total indebtedness to the Council when considering repayment arrangements.
- We will encourage other partners to identify possible vulnerable customers and where possible, develop a joint strategy for repayment of any debts.
- Where agreed by the customer, we will share data with external agencies in order to try to help the individual
- We will promote our Council Tax Support Scheme and Council Tax Hardship Fund, exemptions and discounts on our literature and on our website.
- We will encourage customers to contact us if they are experiencing financial hardship.
- We may ask customers experiencing financial hardship to complete personal budget sheets, to enable us to agree fully informed repayment schedules that are affordable to the customer, and in the best interest of the council.
- If we do not accept a repayment arrangement, we will inform customers in writing
- We will offer face to face appointments for vulnerable customers unable to access services on-line(Customer Services)
- We will offer pre-arranged appointments for vulnerable customers with complex cases as part of our debt recovery process. (Revs & Bens).
- We will hold regular meetings with CAB and our Enforcement Agents to discuss practical and policy issues