Broadland Council

Corporate Debt Management Policy

Updated 2017
**BROADLAND COUNCIL**

**CORPORATE DEBT MANAGEMENT POLICY**

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1. Introduction and objectives

1.1 This document sets out the Council’s policy and procedures in relation to the billing, collection and recovery of monies owed to the Council.

1.2 The Council provides a range of services, and is responsible for the collection of local taxes. Whilst the majority of this income is collected in a timely manner there are occasions when debt-holders do not make payments on time. This gives rise to a requirement to actively manage Council debt, and to set out clearly how the Council will enforce payment of monies owed.

1.3 Methods for the billing and recovery of statutory debt are defined within the relevant statutes. Methods for the billing and recovery of non-statutory debt are designed to comply with best practice.

1.4 The Council’s purpose in relation to debt is:

- To collect all money legally due to the Council, efficiently and fairly in the light of information available taking account of the circumstances of the debtors and the reputation for the Council

1.5 In order to minimise risk, serious consideration must be given to receiving payment prior to providing the goods or services, especially when small sums of money are involved. This will ensure that monies are collected, reduce the work involved in debt collection and will thereby reduce the costs associated in collection and management of debts.

2. Definition of a debtor

2.1 A debtor is any body (whether an individual or an organisation) who is due to pay for goods or services received from the Council, or is liable for a statutory debt, and who has not yet paid the full amount owed.

2.2 The Council will seek payment for goods or services in advance of performance wherever possible.

2.3 The Council would normally expect monies owed in relation to sundry trade debt to be paid, unless otherwise stated, within 30 calendar days of the invoice date. The major exception to this is debts incurred on housing benefit overpayments, where debtors are given one calendar month to appeal against the decision; debt chasing procedures begin as soon as the month expires.

2.4 Community Infrastructure Levy (CIL) recovery is dependent on the value of the invoice and the Community Infrastructure Regulations (2010) as amended. Therefore the pursuit of a debt will follow this route.
3. Procedure for raising an invoice

3.1 Where possible the Council’s trade debt invoices are raised on the Sundry Debtor system, or have been set up as a recurring charge. Services that invoice on a regular basis have access to raise their own invoices on the accounting system. For those invoices that need to be raised centrally, officers should send the following information to the Payments Team:

- Customer name
- Customer address
- Customer number (if existing customer)
- Value of invoice (net of VAT)
- VAT type (if applicable)
- Establishment code (for RADS only)
- Income code
- Detail of the goods/services supplied, which could include:
  1. Goods – type of goods supplied, date of supply
  2. Services – nature of service, address of property (in the case of trade waste collection or property rental etc), dates during which supply has been or will be made
- Whether the invoice is for a recurring supply, or is for a one-off supply
- If recurring: frequency of recurrence (monthly, quarterly, annual)
- Any special instructions (e.g. please provide a DD form to new customer)

3.2 The Payments Team will then notify the relevant service of the invoice number for future reference. For those invoices raised by Service officers, such officers should ensure that adequate records are retained for audit purposes.

3.3 Whenever possible customers should be encouraged to make payment via electronic means (internet, debit/credit cards or direct debit).

4. Performance monitoring and reporting of debt

4.1 The Head of Finance and Revenue Services will report twice yearly on debt recovery in all areas and officers will run the necessary reports for audit purposes during the financial year.

There is a requirement (Reg 62 of the Community Infrastructure Regulations) for the Charging Authority to publish an annual report on its website relating to CIL receipts and expenditure. This report has to include any funds not recovered from Town and Parish Council’s under Reg 59A of the Regulations at the end of the reported year.
5. Principles of enforcement

5.1 The Council will follow principles of good practice based on those originally set out in the Department for Business Enterprise and Regulatory Reform’s Enforcement Concordat. The principles are:

1. Standards
In consultation with business and other relevant interested parties, including technical experts where appropriate, we will draw up clear standards setting out the level of service and performance the public and business people can expect to receive. We will publish this policy on our website. The standards will be made available to businesses and others who are regulated.

2. Openness
We will provide information and advice in plain language on the rules that we apply and will disseminate this as widely as possible. We will be open about how we set about our work, including advertising any charges that we set and consulting businesses, voluntary organisations, charities, consumers and workforce representatives. We will discuss general issues, specific compliance failures or other problems with anyone experiencing difficulties.

3. Helpfulness
We believe that prevention is better than cure and that our role therefore involves actively working with business, especially small and medium sized businesses, to advise on and assist with compliance. We will provide a courteous and efficient service and our staff will identify themselves by name. We will provide a contact point and telephone number for further dealings with us and we will encourage business to seek advice/information from us. Applications for approval of establishments, licenses, registrations, etc, will be dealt with efficiently and promptly. We will ensure that, wherever practicable, our enforcement services are effectively co-ordinated to minimise unnecessary overlaps and time delays.

4. Complaints about service
We will provide well-publicised, effective and timely complaint procedures which are easily accessible to business, the public, employees and consumer groups. In cases where disputes cannot be resolved, any right of complaint or appeal will be explained, with details of the process and the likely time-scales involved. Further details of the Council’s complaint procedure may be found in section 14 of this policy document.

5. Proportionality
We will minimise the costs of compliance for business by ensuring that any action we require is proportionate to the risks. As far as the law
allows, we will take account of the circumstances of the case and the attitude of the operator when considering action. We will take particular care to work with small businesses and voluntary and community organisations so that they can meet their legal obligations without unnecessary expense, where practicable.

6. Consistency

We will carry out our duties in a fair, equitable and consistent manner. While officers are expected to exercise judgement in individual cases, we will have arrangements in place to promote consistency, including effective arrangements for liaison with other authorities and enforcement bodies.

7. Equality

The Council has a number of duties under the Equality Act, 2010. As a consequence, our approach to enforcement includes offering documents in different formats or languages, providing a translator or interpreter service and providing assistance such as TypeTalk.

8. Statutory Debt

In the case of statutory debt, namely Council Tax and non-domestic rates, and Community Infrastructure levy the Council will follow the statutory route of enforcement. This is set out in the Council Tax Administration and Enforcement Regulations 1992 and the Non Domestic Rate Collection and Enforcement Regulations 1989 and Community Infrastructure Levy regulations (2010) as amended.

6. Responsibility for enforcement

6.1 Responsibility for the enforcement of sundry debt collection and housing benefit overpayment rests with the Senior Finance Manager, with the Payments Manager taking day to day responsibility. The Payments Manager will liaise with relevant departments to ensure the correct action on each case is taken.

6.2 Responsibility for the enforcement of Council Tax, NNDR and temporary accommodation arrears rests with the Local Taxation Manager.

6.3 Responsibility for the enforcement of the Community Infrastructure Levy rests with the Head of Planning.

7. Enforcement procedures - pre-litigation

7.1 Note that officers dealing with the recovery of debt should ensure that detailed records of actions taken are recorded within the relevant debtors system so that a clear audit trail is provided.
## Sundry debt – General

<table>
<thead>
<tr>
<th>Debt Recovery Stage</th>
<th>Action</th>
<th>Actions if Debt Remains Unpaid</th>
<th>Day</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>Invoice</td>
<td>Invoice raised and sent to customer</td>
<td>1</td>
</tr>
<tr>
<td>1</td>
<td>Reminder</td>
<td>Final Reminder sent to customer Note raised on Sales Ledger</td>
<td>30</td>
</tr>
<tr>
<td></td>
<td>Phone Contact</td>
<td>Customer contacted by phone and given notice that if the debt remains, it will be sent for enforcement action Note raised on Sales Ledger of conversation outcome</td>
<td>35</td>
</tr>
<tr>
<td>3A</td>
<td>Refer to NPLaw for legal action</td>
<td>Note raised on Sales Ledger. All relevant information passed to Legal team.</td>
<td>42</td>
</tr>
<tr>
<td>3B</td>
<td>Refer to debt collector</td>
<td>Note raised on file All relevant information passed to debt collection agency</td>
<td>42</td>
</tr>
<tr>
<td>4</td>
<td>Additional Action</td>
<td>Discuss with relevant Services whether any further action can be taken – withdrawal of service, barring from use of facilities until debt cleared</td>
<td>60</td>
</tr>
</tbody>
</table>

7.2 Every case must go through every recovery stage, with notes being made throughout.

7.3 The Council will follow this procedure, even if timescales are not met. The procedure should be halted at any stage if agreement with the debtor is reached on payment of the debt, or a decision is taken to write off the debt. Agreements should be put in writing, and debtors should agree to clear the debt on Direct Debit. If the agreement is subsequently breached, the procedure will once again be followed.

## Sundry debt – Other public sector

7.4 In many cases where another public sector body owes the debt, the debt will be governed by a separate agreement (such as a service level agreement), which will set out the recovery processes in the event of dispute or non-payment of debt. In such cases, the provisions of the agreement that covered the original supply will supersede the debt recovery stages set out above (Sundry debt – General) and at section 8 of this policy.

7.5 Should the supply to another public sector body not be covered by a separate agreement, the Council will make every effort to resolve any disputes via arbitration and dispute resolution, and will only refer the debt to Nplaw for enforcement if all other methods of recovery have been exhausted.
Council Tax

7.6 Council Tax recovery procedures are set out in the Administration and Enforcement Regulations 1992 and associated regulations. Applications for a discretionary reduction will be considered under section 13a (1) c) of the 1992 Act when received in writing, although these will be awarded only in exceptional circumstances.

National Non-Domestic Rates (NNDR)

7.7 NNDR recovery procedures are set out in the Collection and Enforcement Regulations 1989 and associated regulations.

Housing Benefit (HB) Overpayments

7.8 Housing benefit overpayments recovery procedures are set out in the Housing Benefit Regulations 2006 and The Housing Benefit (Persons who have attained the qualifying age for state pension credit) Regulations 2006 . After an appeal process as discussed in Para 2.3 has been finalised the sundry debtor approach will be followed to collect any outstanding debt after considering recovery from ongoing benefits or by deduction from other DWP benefits.

Garden Waste Collection Service

<table>
<thead>
<tr>
<th>Debt Recovery Stage</th>
<th>Action</th>
<th>Actions if Debt Remains Unpaid</th>
<th>Day</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>DD payment bounces or is cancelled</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>1</td>
<td>Contact client by letter to set up new DD or re-arrange payment terms.</td>
<td>Advise Environmental Waste to stop collection.</td>
<td>1</td>
</tr>
<tr>
<td>2</td>
<td>First &amp; Final Reminder</td>
<td>First reminder letter issued. Note put on Sales Ledger</td>
<td>14</td>
</tr>
<tr>
<td>3A</td>
<td>Refer to NPLaw for legal action</td>
<td>Case sent to Legal; note put on file</td>
<td>28</td>
</tr>
<tr>
<td>3B</td>
<td>Refer to Debt Collectors</td>
<td>Case referred to Debt Collection Agency: note placed on file</td>
<td>28</td>
</tr>
<tr>
<td>4</td>
<td>Notify Depot to collect bin</td>
<td>If no payment is received, bin should be collected from house. Note put on file.</td>
<td>42</td>
</tr>
</tbody>
</table>

7.9 Every case must go through every recovery stage, with notes being made throughout.
7.10 The Council will follow this procedure, even if timescales are not met. The procedure should be halted at any stage if agreement with the debtor is reached on payment of the debt, or it is decided to write off the remaining debt. Agreements must be made in writing, and debtors should agree to make payments by direct debit. If an agreement is subsequently breached, the procedure will once again be followed.

7.11 No payment terms will be offered for garden waste service. This should be a single payment.

Mortgages

7.12 The Council has some residual mortgages relating to the sale of its housing stock in 1993. Failure to repay any mortgage in accordance with the original agreement would trigger the debt recovery process;

1. The mortgage officer would write a reminder letter to the mortgagor, drawing their attention to the default and inviting them to contact the Council to discuss any difficulties and to agree an arrangement to re-schedule payments.
2. If there is no response, a second reminder letter is sent.
3. If there is no response, a third letter is sent, reminding the mortgagor that failure to pay their mortgage as agreed may result in legal action. All additional means of contacting the mortgagor will be considered.
4. If there is no response within 28 days of the third letter being sent, the matter will be referred to the Senior Finance Manager for discussion. As a last resort, the debt may be referred to NPLaw for legal action.
5. It should be remembered that the Council holds a first charge against the property in the event of its sale. In all considerations of the defaults, the proportion of debt to property value will be taken into account.

Loans to staff

7.13 The Council occasionally makes advances of salary to staff. These are repaid by deduction from the next month’s salary, without accruing interest.

7.14 The Council operates an assisted car purchase scheme for staff. Employees repay the loan principal and the interest accrued in monthly instalments via salary deduction. If the employee leaves the authority any outstanding loan amount becomes repayable in full by the last day of service. The collection of this debt is administered via the Sundry Debtors system.

7.15 The Council may bear the cost of studying for a professional qualification on behalf of a staff member, if the qualification is an essential part of the career development for the post concerned. Trainees are required to sign a training contract prior to the commencement of their training. If the trainee leaves the authority within 12 months of successfully completing the training, or fails to complete the requirements of the course, any training expenditure that was incurred becomes repayable in full by the
last day of service. The collection of this debt is recovered from the employee’s final salary payment; if the debt exceeds 20% of the final salary payment the remaining debt will be invoiced to the employee. Recovery procedures will then follow those set out under “Sundry Debts” in Section 7 of this policy.

8. Enforcement procedures - litigation

8.1 If the debt remains outstanding after the pre-litigation enforcement steps noted in section 7 have been followed, the debt should be referred to NPLaw. Payments will ordinarily take the following actions:

- Issue a letter stating that the non-payment of the debt may lead to court action or enforcement by the Council’s Debt Collection Agency.
- The Council has the option at this point to take the case to court for action.

8.2 The Payments Manager will decide whether to use legal action or debt collection action to pursue the debt. If legal action is considered appropriate, the following principles will be followed:

- Debts below £5,000 will be pursued in the Small Claims Court. Payments Section will action this process.
- If the debt is over £5,000 the claim will be pursued in the County Court, and legal advice from NPLaw will be followed throughout the whole procedure.
- Large debts consideration may be given to instigating Charging Orders on land. All such cases must be referred to NPLaw initially.
- Any cases of a sensitive, controversial or contentious nature will be referred to NPLaw in the first instance prior to any decision on recovery action.
- Cases which are disputed and defended in court will be referred to NPLaw.
- If the Payments Supervisor has serious concerns about a debt of less than £5,000, this may also be referred in the first instance to NPLaw for legal advice. In such cases, notes must be kept of the factors that prompted such action, and the Senior Finance Manager should be informed beforehand.

Council Tax

8.3 Council Tax recovery procedures are set out in the Administration and Enforcement Regulations 1992 and associated regulations. Applications for a discretionary reduction will be considered under section 13a (1) c) of the 1992 Act when received in writing, although these will be awarded only in exceptional circumstances.
National Non-Domestic Rates (NNDR)

8.4 NNDR recovery procedures are set out in the Collection and Enforcement Regulations 1989 and associated regulations.

8.5 The over-riding responsibility of all concerned is to pursue debts as far as is reasonably practicable, without bringing the Council into disrepute.

9. Enforcement Procedures – Debt Collection Agency

9.1 If a debt collection agency is employed to recover debts, the agency may be instructed to use all means at their disposal to ensure payment of the debt. The procedures to be utilised are laid out in the contract between the Council and the debt collection agency.

9.2 The Payments Manager will liaise closely with the agency, and will decide whether the debt is irrecoverable. If this is the case, the management of the case will return to the Council to be written off, as set out in Section 12 of this policy.

Council Tax

9.3 Council Tax recovery procedures are set out in the Administration and Enforcement Regulations 1992 and associated regulations.

National Non-Domestic Rates (NNDR)

9.4 NNDR recovery procedures are set out in the Collection and Enforcement Regulations 1989 and associated regulations.

Community Infrastructure Levy

9.5 Procedures to recover community infrastructure levies are set out in the Community Infrastructure Levy Regulations (2010) as amended.

10. Agreeing Payment Plans

10.1 Officers discussing payment options with customers must take the individual’s specific circumstances into account; however, the Council has a responsibility to maximise the amount of debt collected. Officers should refer customers to debt advice agencies if appropriate (see Section 13).

11. Council Tax and Non-Domestic Rates

11.1 Each month from April onwards an initial reminder notice will be issued to customers whose account has overdue instalments.

11.2 Where customers ring to make payments or agree an arrangement following the issue of reminder notices, calls should be logged using the Academy notes facility where appropriate.
11.3 Staff should attempt to persuade the debtor to pay the outstanding amount over the phone – if debtors are unable to pay enough to bring the account up to date, an arrangement may be considered. Checks on payment history may be made as well as details of failed arrangements.

11.4 In principle, only one payment arrangement should be made for each debtor prior to summons. Therefore if there has already been a payment arrangement within the year that has failed, no further arrangements should be suggested or accepted. However there may be exceptions to this, and all factors should be considered before refusing a further arrangement.

11.5 Where payments are not made following the issue of a reminder, staff may telephone the debtor and attempt to persuade him or her to pay the outstanding amount by debit card during the call. If the debtor is unable to pay in full, an arrangement may still be considered, although reference should be made to payment history, as explained in the previous paragraph.

11.6 If debtors do not comply with an arrangement to pay, an arrangement reminder will be sent, followed by a default notice if there is still no response.

11.7 A Final Notice will be sent to those cases who do not pay at reminder stage or make an arrangement.

11.8 A Magistrates Court Summons will be issued where payment has not been made.

11.9 Following court and the granting of a liability order further action will be taken as appropriate. This may include an attachment to earning or benefit or use of an enforcement agent.

11.10 Where enforcement agents are unsuccessful the Council may commence committal proceedings, bankruptcy action or apply for a charging order.

12. Write-off procedures

12.1 Whilst the Council will make every effort to pursue debts, it recognises that in some circumstances debts are not recoverable. Good practice dictates that, when all methods of debt recovery have been exhausted, any debts that remain outstanding and are deemed to be irrecoverable are written off promptly in accordance with the Council's Constitution and Financial Regulations.

12.2 In order to request a debt write-off, an officer must demonstrate that the enforcement steps of the Council’s Debt Management Policy and Procedures have been followed where appropriate, and that one or more of the following conditions have been met:

1. The debt has been remitted by a Magistrate;
2. The debt is owed by a person or corporate body subject to bankruptcy or
3. insolvency proceedings, with little chance of the Council receiving part of the final distribution;
4. The debtor has died, leaving insufficient funds in his or her estate to settle the debt;
5. The debtor is suffering from a severe illness which makes enforcement action inappropriate;
6. It is not cost-effective to pursue the debt (for example, fact that enforcement might cost more than the debt to be recovered); or
7. The debtor cannot be traced.
8. It has been determined that under the Housing Benefit regulations that it is not appropriate to recover a recoverable overpayment.

12.3 Note that it is only appropriate to issue a credit note against a debtor invoice when some detail on the original invoice was incorrect. If a valid invoice was raised but the debt is not collectable, the debt must be written off in accordance with the write-off procedures.

12.4 The Council’s write off delegation levels are shown in Section 18.10 of Part Four of its Constitution.

13. Advice and assistance

13.1 The Council will seek to provide information about debt advice and potential statutory benefits and discounts to those debtors who cannot pay. Officers will remind debtors of the importance of paying priority debts, such as Council Tax arrears. Non-payment of Council Tax and CIL arrears can result in the seizure of a debtor’s goods, or in the debtor being sent to prison. Debtors who are in financial difficulty may find it beneficial to obtain specialist advice from one of the following agencies:

- **Broadland District Council**
  Appointments can be made for face to face or telephone debt advice. Please contact the Debt Advice Officer on 01603 430147 or email suzanne.payne@broadland.gov.uk quoting “Debt Advice” in the subject line. Alternatively, download our self-help guide from [http://www.broadland.gov.uk/advice_and_benefits/3542.asp](http://www.broadland.gov.uk/advice_and_benefits/3542.asp).

- **Money Advice Centres and Law Centres**
  Money Advice Centres or Law Centres can also provide help with debt problems. Details of the nearest centres may be found in the telephone directory. Further advice can be found in the Community Legal Advice section of the [www.gov.uk](http://www.gov.uk) website: [https://www.gov.uk/legal-aid/how-to-claim](https://www.gov.uk/legal-aid/how-to-claim).

- **National Debtline**
The National Debtline provides free debt management information to people living in England and Wales. Debtors can contact National Debtline by calling them on 0808 808 4000 or via the website: www.nationaldebtline.co.uk.

- **Business Debtline**
  Business Debtline provides advice for small business in England and Wales.
  Debtors can contact them by calling 0800 197 6026, or online at www.bdl.org.uk.

- **Step Change**
  StepChange Debt Charity is the new name for the organisation known as Consumer Credit Counselling Service (CCCS). Their website is at http://www.stepchange.org and their phone number is 0800 138 1111.

- **Community Legal Advice**
  Community Legal Advice offers advice to people in debt who are on a low income or on benefits.
  Debtors can contact them by calling 0845 345 4 345 or via the website at https://www.gov.uk/legal-aid/how-to-claim.

- **Citizens Advice Bureaux**
  Citizens Advice Bureaux offer advice about simple debt problems, and will be able to refer debtors to a specialist advisor if the debt problem is complicated. Accessible through their website: http://www.adviceguide.org.uk/index/life/debt or their Advice line of 08444 111 444.

- **Norwich Citizens Advice Bureau**
  St Crispin’s House
  Duke Street
  NORWICH
  Norfolk
  NR3 1PD
  Telephone Admin and Appointments 01603 660857
  Fax 01603 679679

14. Complaints
14.1 Debtors may wish to complain to us if:
- We have done something wrong
- We have not done something we should have
- We have not treated one of our customers in a professional or civil manner

Our promise:
- We will take any complaint about our services seriously
• We will investigate any complaint thoroughly
• We will inform complainants of the outcome of the investigation

There are three steps in the Council’s complaints procedure:

Step 1 - Talk to us
The first step is to talk to the person you originally dealt with. You can use telephone or e-mail. If you are not sure how to contact them, please look at the contact us page on our website or call our reception on 01603 431133 and they will put you through.

Step 2 – Make a formal complaint
If you are still unhappy after having spoken to our staff, you should make a formal complaint. This may be done by email (complaints@broadland.gov.uk), letter (Thorpe Lodge, 1 Yarmouth Road, Norwich NR7 0DU) or if you prefer you can file a complaint online by going to our website, www.broadland.gov.uk, searching ‘Make a complaint’ and complete and submit the online form.

We will acknowledge your complaint and send a reply within ten working days. If we need more time to fully investigate, we will write to you within this time to let you know.

Step 3 - Local Government Ombudsman
If you have tried Steps One and Two and are not satisfied with the response you have received, you can take your complaint to the Local Government Ombudsman. The Ombudsman works independently from the Council, and will assess the problem impartially, provided that you have tried and failed to resolve the problem through our complaints procedures first.

You can contact the Local Government Ombudsman’s office by calling their Adviceline on 024 7682 0000 or via the website: http://www.lgo.org.uk/

Councillors
You may contact your councillor for assistance at any stage. To find your own councillor’s contact details, go to the Council’s website (www.broadland.gov.uk), click on ‘find your councillor’ from the home page.

For more information or clarification on our complaints scheme please contact us using the details below:

How to contact us regarding a complaint
• Online - follow the relevant link in Step 2 above;
• In person at the Council’s offices – Thorpe Lodge, 1 Yarmouth Rd, Thorpe St Andrew, Norwich NR70DU
• By telephone, on our main switchboard number 01603 431133;
• **By email**, at complaints@broadland.gov.uk.

• **In writing**, to Broadland District Council (using the above address).

• **Alternative formats** are available, such as Braille and large print. If you require this document in a different format, please contact us on 01603 431133.

• **Intran** is available if you prefer to talk to us in a language other than English. This includes sign languages.

15. **How to contact us otherwise**

• **Online** – Our website is www.broadland.gov.uk

• **In person** at the Council’s offices – Thorpe Lodge, 1 Yarmouth Rd, Thorpe St Andrew, Norwich NR7 0DU

• **By telephone**, on our main switchboard number 01603 431133;

• **By email**; Go to our website at www.broadland.gov.uk, click on the “Contact us” link and find the departmental email address you need.

• **In writing**, to the Council’s offices – Thorpe Lodge, 1 Yarmouth Rd, Thorpe St Andrew, Norwich NR7 0DU

• **Alternative formats** are available, such as Braille and large print. If you require this document in a different format, please contact us on 01603 431133.

• **Intran** is available if you prefer to talk to us in a language other than English. This includes sign languages.

16. **Review of this policy**

16.1 The Council is committed to continuous improvement and it is critical that new approaches and ways of working will be introduced. This policy will be reviewed regularly to allow it to be updated and to take any service improvements or changes into account as appropriate.

16.2 For transparency the policy will be available on the Council’s website.