

Tower Hamlets Council Corporate Debt Management Strategy

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1. Introduction

- 1.1 The London Borough of Tower Hamlets has a fiduciary responsibility and duty to protect public funds for its residents. This includes the collection of outstanding debts and to charge for its services both efficiently and fairly, ensuring processes and decisions are equitable and proportionate. The Debt Management Strategy outlines the council's approach to managing and recovering outstanding debts. This strategy aims to ensure that all debts owed to the council are collected efficiently and fairly, while also providing support to those experiencing financial difficulties. This strategy is not a step-by-step debt collection procedure but sets out the principles which the council will follow in recovering amounts owed.
- 1.2 This document will be supported by individual service policies and procedural guidance for staff, agreed by individual directorates. Including the Income Collection Forum. The function of the Forum is to promote good practice in terms of income collection and enforcement, to ensure there is a consistent approach that will maximise its income, minimise write-offs, and consider ability to pay and vulnerability throughout the enforcement process.
- 1.3 By implementing transparent charging policies, accurate and timely billing, and effective recovery processes, the council seeks to maximise income collection and minimise debt levels. Additionally, the strategy emphasises the importance of protecting vulnerable and low-income households, ensuring that those who can pay do so, and offering assistance to those who cannot. This comprehensive approach will help maintain the financial sustainability of the council and ensure the continued provision of essential services to the community.
- 1.4 This strategy has been developed through an examination of the way we currently do things, consultation with all directorates covering all major income streams, and benchmark with other councils' debt policies as well as other good practice. This strategy relates to all customers of the council, residents, businesses, partners, staff, and contractors.
- 1.5 The introduction of this policy supports the council's strategic aim of One Tower Hamlets, "working efficiently and effectively as one council, and should be read in conjunction with the council's Financial Inclusion Policy.

2. Objectives of the Strategy

- 2.1 The key objective of the strategy is to maximise the level of income collected by:

- Implementation of transparent charging policies
- Accurate and timely billing
- Reducing debt levels
- Effective recovery processes

To pursue all debts, ensuring that those with the means to pay do so. To protect vulnerable and low-income households by:

- Ensuring that debts are managed consistently and in line with the relevant legislation, best practice, and Tower Hamlets' values
- Helping customers repay sums owed in a sustainable way and avoid future arrears

- Identifying customers both individual and commercial that *'can't pay' rather than 'won't pay'*
- Making arrangements to enact 'Breathing Space' requirements where appropriate
- Providing facilities to enable customers to discuss their debts in a confidential environment offering assistance wherever possible
- Inviting customers to provide details of their means by listing their income and expenditure, (evidence will be requested if necessary)
- Considering if customers have other debts owing to the council and considering these when agreeing a recovery plan
- Encouraging customers to use the money advice services available from the Citizens' Advice Bureau and other debt advice providers.

To ensure tenants and debtors are receiving all the benefits they are entitled to, to maximise their income.

- Tenants and debtors are encouraged to contact the Tackling Poverty team, Resident Support Service, and/or The Citizen's Advice Bureau and other Debt advice in Tower Hamlets and online, including the Residents Support Service.

2.2 This strategy applies to all sums owing to the council and has been developed to ensure a consistent approach to the management of debt and income across the council. The main areas being:

- **Council Tax** – the charge payable on all domestic properties
- **Business Rates** – the charge payable on all commercial properties
- **Overpayment of Housing Benefit & LCTRS** – this occurs when benefit/LCTRS is paid, and the claimant is not entitled to some or all the Housing Benefit/LCTRS that has been given.
- **Sundry Debts** – the fees and charges made for a wide and varying range of council services such as the following:
 - Commercial Rent
 - Market Rent
 - Schools Repairs & Maintenance Charges
 - Planning and Building Control
 - Highways and recharges
 - Trading Standards
 - Salary Overpayments
 - Recovery of loans
 - Trade Waste
- **Housing Debts** – made up of the following:
 - Housing Rent Arrears
 - Former Tenant Arrears
 - Leaseholder Service Charges

- Major Works
 - Homelessness Rent Arrears
- Parking – including income from Permits and Penalty Charge Notices
- Adult Social Care debt – made up of the following:
- Residential care home charges
 - Non-Residential charges
 - Health Authorities

3 Primary Legislation Governing Collection

- Local Government Finance Act 1992 (as amended)
- The Council Tax (Administration & Enforcement) Regulations 1992 (as amended)
- Local Government Finance Act 1988 (as amended)
- The Non-Domestic Rating (Collection & Enforcement) (Local lists) Regulations 1989 (as amended)
- HB Regulations 2006 (as amended)
- Care Act 2014 (as amended)
- Distress Rent Act (as amended)
- Local Government Act 1972 (as amended)
- Civil Procedure Rules 1998 (as amended)
- Insolvency Act 1986 (as amended)
- Tribunals, Court and Enforcement Act 2007 (as amended)
- Taking Control of Goods Regulations 2013 (as amended)
- The Traffic Management Act 2004 (TMA) (as amended)
- Debt Respite Scheme (Breathing Space) - The Debt Respite Scheme (Breathing Space Moratorium and Mental Health Crisis Moratorium) (England and Wales) Regulations 2020. (as amended)

4 Definition of a Debtor

- 4.1 A debtor is anybody (whether an individual, organisation, staff member (current or previous) or councillor) who has received goods or services from the council, or is liable for a statutory debt, and who has not yet paid the full amount owed.

5 Key Principles

- 5.1 It is important to the financial sustainability of the council that it can collect all income due to it. This enables the council to pay for the services it delivers. Any non-payment reduces the services the council can provide.
- 5.2 Responsibility for maximising income to the council for the services it charges for sits with the Corporate Directors. The Section 151 Officer is responsible for the overall financial management of the Authority.
- 5.3 The council will follow the principles of good practice set out below:
- Fair charging policies that are reviewed regularly.

- Payment in advance of receiving services by default.
- Accurate, clear and prompt billing supported by appropriate automation to maximise the time spent supporting those who need it and chasing aged debtors.
- Promote Direct Debit as the default method of payment with a range of other payment options for customers without a bank account.
- We will provide a choice of convenient methods of payment for bills and invoices.
- Provide advice on ways to reduce bills and maximise income.
- Consider special payment arrangements for those customers experiencing financial difficulties.
- Keep customers informed.
- Leverage digital channels.
- Take appropriate recovery action.
- Multiple debt management – taking appropriate actions where the council is aware of more than one debt owing to the council.
- The regular review and write-off of irrecoverable debts
- We will train our staff involved in the recovery of debts on anti-poverty and social inclusion awareness.

6 Charging Policies

- 6.1 The council will charge for all services where it is possible and appropriate to do so.
- 6.2 Charging policies will be clear, effective, and easy to understand.
- 6.3 Charges should cover the full cost of service provision (including overheads) unless there is a decision to subsidise in order to incentivise the take up of services (e.g. for preventative reasons). Any subsidisation decision should be fully cognisant that this effectively charges all residents through Council Tax rather than directly to those accessing the goods and services in question.
- 6.4 Each Directorate will review charges and policies regularly and at least annually. These reviews should fully recover cost inflation so as not to inadvertently introduce a subsidisation
- 6.5 Directorates must ensure their charging and collection methods are robust and effective

7 Performance Management

- 7.1 Prompt recovery action is key to managing debt and maximising income. The council therefore aims to:
 - Regularly monitor the level and age of debt.
 - Set clear targets for the recovery of debt.
 - Have clear written recovery procedures.
 - Set priorities for specific areas of debt and assess recovery methods to ensure maximum recovery.
 - Collaborate across departments to maximise recovery.
 - Regularly review and propose irrecoverable debts for write-off

8 Collection and Recovery

- 8.1 Tower Hamlets Council's approach will be consistent, transparent, firm, fair and courteous.
- 8.2 Consistency means taking a similar approach in similar circumstances to achieve similar ends. The council aims to achieve consistency in the advice it gives, the use of powers, and the recovery procedures used.

- 8.3 The council recognises that consistency does not mean simple uniformity and will take account of many variables such as the individuals needs and ability to pay and the need to secure the debt on behalf of the council.
- 8.4 Transparency is important in maintaining public confidence; helping people to understand what is expected of them and what they should expect from the council and clearly explaining the reasons for taking recovery and enforcement action.
- 8.5 Customers are proactively encouraged to make contact to discuss their situation and the options available to them to make payment before any necessary recovery and enforcement action is taken.
- 8.6 Tower Hamlets Council recognise that causes of both individual and commercial debt vary and recovery methods should be focused accordingly. Therefore, wherever possible debt will be categorised to help focus the use of resources and concentrate action on those who won't pay rather than those who can't pay.
- 8.7 Recovery action will be taken in a timely manner and wherever possible technology will be utilised to automate and expedite processes. For example, Council tax has very high volumes of recovery action, so reminder, final and summon notices are generated automatically. Cases at summons stage are individually checked before the summons is issued.
- 8.8 Before enforcement action is taken, the council may use reminders, correspondence, nudge techniques, SMS and telephone contact with the debtor.
- 8.9 Where an enforcement agency is used to assist with collection, the flow of information between the council and the agent must be in a secure electronic format.
- 8.10 All statutory methods of enforcement of debts shall be available for use. These include:
- Attachments of earnings
 - Warrants of execution
 - Third party orders
 - Insolvency
 - Possession proceedings
 - Deferred payment agreements
 - Means Hearing for council tax and business rates
 - Charging orders
 - Recovery from ongoing or arrears of benefit
 - Attachments to state benefits
 - Registering debts at County Court
- 8.11 **Enforcement Agents and Enforcement Management**
- 8.11.1 When collecting the sums due for services, we believe there is a balance to be struck between taking effective action to recover as much as possible, in the interest of all customers, and dealing sensitively with those customers who genuinely find themselves in financial difficulty.

8.11.2 The ability to refer debts for enforcement is an important tool in the recovery process. The council appreciates the sensitivity attached to the use of Enforcement Agents, but we recognise that they can be the most effective method to collect debt from those who won't pay rather than can't pay.

8.11.3 Enforcement performance and contract management will be in place to ensure compliance with codes of conduct good practice. These services will comply with the Government's National Standards for Enforcement.

8.12 **Tracing Absconders**

8.12.1 The council will make all necessary attempts to trace any customer that has absconded to ensure that payment is received. This will include checking internal and external sources of information, sharing information with other authorities and using tracing agents as appropriate. The timeliness of tracing, allowing time for the customer to reappear, will be considered before the debt is submitted for write off.

8.13 **Charges on Property**

8.13.1 The enforcement action taken will depend on the nature of the services that have been provided, and hence the client group. Where the council has a monopoly, an obvious course of action would be to withhold services until the debt is paid. However, where the council has a duty to provide the service and only a power to charge, withholding future services is not an option and an alternative approach needs to be considered such as placing a legal charge on a property.

8.14 **Council Members and Staff**

8.14.1 Council members, officers, and current or former employees are expected to demonstrate the highest standards of integrity. This includes ensuring that no overdue debts are owed to the Council, as timely payment sets a clear example of accountability and good practice.

8.14.2 The council will use the information it holds on staff to assist with debt recovery. Where debt is overdue, the council may choose to pursue an attachment of earnings, deduction from salary or other formal processes as appropriate.

8.14.3 Section 106 of the Local Government Finance Act 1992 imposes a duty on a Councillor whose Council Tax payments are two months overdue to make a declaration to that effect, and refrain from voting in certain matters.

8.15 **Staff Overpayments**

8.15.1 In most circumstances the council has the right to reclaim money if they have overpaid a member of staff. The council will contact the staff member as soon as they are aware of the mistake.

8.15.2 If a staff member notices an overpayment in their payslip, they must talk to their manager as soon as possible.

8.15.3 All staff overpayments should follow the council's overpayment of salary policy which can be found on the **Bridge** site.

8.15.4 If an overpayment has occurred:

- The payroll section will contact the employee by letter, email or telephone and agree how the money will be paid back,
- The Council will not deduct money from a staff members wage without letting them know.
- If a staff member owes money but not no longer works for the Council, the council will contact them.
- The Council will be reasonable and fair pursuing repayment and seek to reach agreement with any staff member on the method and timing of recovery.
- If a former staff member refuses to pay back money, the Council will go to court to get the money back from them

9 Application of Interest on Commercial Debts

- 9.1 The Council is often owed significant sums of money from commercial entities who deliberately delay payment, costing Tower Hamlets residents in lost interest.
- 9.2 To ensure timely payments and to compensate for the financial impact of late payments, Tower Hamlets Council may apply statutory interest on all overdue commercial debts. Statutory interest will be calculated at a rate of 8% per annum above the Bank of England base rate, as stipulated under the Late Payment of Commercial Debts (Interest) Act 1998. This interest will be applied from the day after the payment was due until the date the payment is received. This approach will be applied on a case-by-case basis and aims to encourage prompt payment and ensure that the council is fairly compensated for the delay in receiving funds.
- 9.3 The council will only seek to apply interest on payments where it is satisfied that the situation is a 'won't pay' scenario rather than a 'can't pay' situation. The council will act consistently with its approach to support local SMEs.

10 Right of Appeal and Complaints

- 10.1 One of the principles of this strategy is to minimise the level of appeals and complaints. However, officers must make decisions regarding the most appropriate action to take and the reasons why. If the customer/organisation disagrees with the decision they have the right of appeal.
- 10.2 Appeals should be made in writing by post or e-mail and considered by the Management Team of the Service area concerned. Customers should be asked to explain the reason for the appeal and provide as much information as possible to support proper consideration of any complaint or appeal.
- 10.3 The original decision will be reviewed within 7 days, and the customer will receive a written response. The response will either uphold the original decision or revise the decision.
- 10.4 The Corporate Complaints procedure allows for formal complaints to be made if a customer is not satisfied with the standard of service.
- 10.5 If the complainant remains dissatisfied after the Council has investigated the complaint, the complainant may make a further complaint to the Local Government Ombudsman.
- 10.6 All information collected is governed by the Data Protection Act 1998 and the council has the following procedures and policy in place to comply with the Act.

- Information Security Policy
- [GDPR \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

11 Write-Off Procedures

- 11.1 The council recognises that where a debt remains unpaid after exhausting all appropriate recovery methods and is deemed to be uncollectable, or where there are extenuating circumstances, the debt will be recommended for write off. The council will seek to minimise the cost of write offs to Council taxpayers by taking necessary action to recover monies due.
- 11.2 Debts may be regarded as uncollectable where:
- The debt is uneconomic to collect i.e. the cost of collection is greater than the value of the debt.
 - The debt is time barred, where the statute of limitation applies. Generally, this means that if a period of six years has elapsed without notifying the debtor of the amount owing, the debt cannot be enforced by legal action.
 - The debtor cannot be found or communicated with despite all reasonable attempts to trace.
 - The debtor is deceased and there is no likely settlement from the estate or next of kin and where there is written confirmation from the Receiver.
 - Insolvency where there is no likelihood of settlement and written confirmation from the Official Receiver or Administrator.
- 11.3 Good practice dictates that, when all methods of debt recovery have been exhausted, any debts that remain irrecoverable are written off promptly in accordance with the council's Constitution and Financial Regulations. Debt, even when written off, may still be due to the council and may therefore continue to be pursued. For example, should a debtor seek to obtain council services in the future, or the debtors whereabouts become known, action will be taken to recover the outstanding debt.
- 11.4 The CIPFA Code of Practice on Local Authority Accounting, (The Code) requires the council's statement of accounts to include sufficient allowance for doubtful debts (bad debt provision). This provision will be determined by the Section 151 Officer as part of their responsibilities. The external auditor will subsequently review this provision for appropriateness.
- 11.5 Generally, the older a debt is, the greater the requirement for an allowance for doubtful debts. Provisions are always reviewed as part of the closure of accounts process but should also be reviewed on a regular basis throughout the year, and any likely requirement to increase the provision at the year-end should be identified and reported through regular budget monitoring.
- 11.6 Where aged debts are written off, they will generally be charged to the allowance for doubtful debt of the council and not impact on service budgets. Where in year debts are written off, or debts are cancelled through Credit Notes, these will be offset against the service area in question, appropriately reducing the amount of income being reported.

12 Customer Care and Advice

The Local Government Ombudsman has dealt with a number of high-profile cases where, in their opinion, local authorities are guilty of maladministration where they have opted to pursue debtors

using bankruptcy proceedings. The report draws attention to debtors who may lack capacity and the duties of the council under the Equalities Act.

Factors that should be considered before commencing bankruptcy proceedings include:

- Costs, effectiveness, and other implications of bankruptcy. The individual circumstances of the debtor, e.g.; vulnerability
- If a charging Order maybe appropriate, due to vulnerability or debt value
- General equality duties
- Implications for overall payment levels if people come to believe that council tax will not be collected
- Impact of non-payment on revenues and the ability to deliver services of the community, and
- Equality between those who do pay and those who don't

The Ombudsman is likely to find maladministration if a council:

- Does not have a formal, published Debt Recovery Policy
- Has not gathered and considered information about a debtor's circumstances
- Does not include in its Debt Recovery Policy the steps officers must take before deciding on bankruptcy, committal to prison, or charging orders, or
- Pursues bankruptcy without clearly recording that each of these steps had been taken

12.1 Vulnerability should always be considered to ensure, where possible, inappropriate action is not taken in the enforcement process. It is difficult to give an all-encompassing definition of vulnerability, but it will include any individual or household experiencing difficulties with everyday living due to health, disability, worklessness, language, behavioural, family, social, age, financial, educational, or other circumstances or combination of these, that prevent a resident from managing their affairs.

Vulnerability can be a variable state and can occur at points in life, such as bereavement, and can be temporary, periodic and recurring due to, for example, mental distress can be ongoing or can increase over time. It is important that we are aware of it as early as possible in the billing and enforcement process and cases should be identified early on in the collection process to ensure that the needs of vulnerable residents are being taken into account and should be built into all processes used to collect money in the borough. This information should be noted, where possible, at the time the account is set up. Prior to recovery action with regards to Adult Social Care Charges, the debt will be presented to a debtors panel, which will be held monthly, where the Director of Adult Social Care will be presented with the background of the debtor, supplied by the social worker, with the key element confirming capacity before any decision on further recovery action is agreed.

12.2 Where committal action, insolvency proceedings or eviction are being considered, all reasonable efforts must be made to ascertain whether the debtor is vulnerable in any way, before commencing this type of enforcement action. Adult Services, the Benefits Service, and Revenue Services may all hold useful information to help determine whether this course of action is appropriate. For audit purposes, a note should be made of what services have been checked

12.3 We will always seek to make realistic arrangements to clear outstanding debts by regular payments in preference to enforcing court orders.

12.4 Any reminders we issue will convey a willingness to discuss matters with customers and encourage them to make contact if they cannot pay as advised. They will also make the customer aware of the consequences of failing to pay or keep to arrangements.

12.5 If a customer fails to make contact or maintain payment arrangements, we have a duty to collect what is due and will use all means available to recover debts. The methods of enforcement include (but are not limited to the following):

- visit to debtor's home and telephone contacts.
- digital messaging
- attachment of earnings
- warrants of execution (taking possession of goods, charging order on land and securities).
- Warrant of Control for penalty charge notice
- deduction from housing benefits – for Overpayment of Housing Benefit
- deduction from DWP benefits
- external Collection agents including enforcement agents – who follow detailed legislation and a Code of Conduct agreed with the council.
- possession proceedings
- charging orders
- third-party debt orders
- insolvency/bankruptcy
- liquidation
- committal to prison proceedings

12.6 Where contact or payments are not made for Sundry Debts we will terminate any non-statutory services.

12.7 Enforcement Agents must follow the requirements in the Tacking Control of Goods Legislation as well as a strict code of conduct agreed with the council.

Once an account is passed to enforcement agents all future payments must be made directly to them unless otherwise agreed by the council in exceptional circumstances.

Enforcement agents must seek approval from the council prior to the removal of goods from a debtor's home.

We will follow the **principles of enforcement** outlined below:

- our action will be proportional – we will strike a balance between the potential loss of income to the council and the costs of taking a course of action
- our approach will be consistent – with the aim of achieving consistency in the advice we give, the use of our powers and in the recovery procedures we use
- our actions will be transparent – to help customers to understand what is expected of them and to explain the reasons for taking any enforcement action

13 Breaches and Non-Compliance

13.1 Despite our procedures for recovering debts there are always cases that may be deemed impossible or not cost-effective to pursue. There are a variety of reasons why this might happen, these include:

- the amount outstanding is below a pre-agreed lower petty write off limit.
- the customer has left an address, and we are unable to trace them.
- the customer has died and there are not sufficient funds from their estate to pay the amount owed.
- the customer is bankrupt or if the company is insolvent (however we do submit a claim in bankruptcy and any payments received from the Official Receiver are credited to the account accordingly)
- it is uneconomical to pursue the debt
- health and financial considerations
- statute barred – an invoice is irrecoverable if six years have elapsed from the date of the invoice, date of service or last payment date, whichever is the latter. If the debt is acknowledged by the debtor, the six years runs from this date. All debts which are statute barred will be processed through the agreed write off procedures as irrecoverable.
- Official error Housing Benefit and/or Council Tax reduction overpayments, where the customer could not reasonably be expected to know they were being overpaid.
- Housing Benefit and/or Council Tax reduction overpayments where the authority decides that it is unreasonable to recover the debt.

13.2 We will monitor all outstanding debts to ensure that they are recoverable and will take prompt action when irrecoverable debts are identified to write them off in accordance with our financial regulations. These financial regulations include an appropriate level of authority that has been delegated to officers.

13.3 The formal 'writing off' of any debts will not rule out recovery action being taken in the event that a customer's circumstances change or we are able to trace their whereabouts. The council may carry out further searches for absconder debts at any time.

14 Review of Strategy

14.1 The London Borough of Tower Hamlets is committed to continuous improvement and so it is inevitable that new approaches and ways of working will be introduced. This framework will be continually reviewed to enable it to be updated where necessary and to consider any service improvements or changes to legislation.

In order to comply with our customer promise we will:

- encourage customers to make early contact to avoid a 'build-up of debt'
- ensure that debts are collected in an efficient, sustainable and sympathetic way

- seek an understanding of the debtor, including if they are vulnerable or have been affected by welfare reforms or other legislative change. This may include having benefits reduced, or being impacted by the bedroom tax or benefit cap
- provide advice and guidance on ways to reduce bills and maximise income
- advise customers how to complain if they are unhappy with the service they have received
- ensure that customer experiences and feedback are used to inform policies and processes on collecting debt
- welcome the involvement of welfare agencies where authorised by the debtor in connection with debts due to the council and recognise the benefits that these organisations can offer both the debtor and the council in prioritising repayments to creditors and in maximising income available to the debtor.
- ensure that services are delivered in the line with our Equality Strategy and that they are accessible, including making services physically accessible to people with disabilities.
- attempt at all times to use the most appropriate and effective method of debt recovery in order to maximise income and minimise costs to the debtor
- develop a better understanding of customers to aid the targeting of direct debit and benefit 'take up' campaigns
- ensure that initiatives do not have a negative impact on vulnerable people.
- highlight and signpost debtors to the appropriate support either within the council or elsewhere.

[Customer promise \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

[Tower Hamlets Customer Experience Strategy 2023-26](#)

[Residents' Support Scheme \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

14.2 All staff involved in the billing, collection, recovery and enforcement of debts will be trained in customer care and understanding the debtor including the identification of vulnerability.

15 Efficiency and cost-effectiveness

15.1 We will seek to ensure that our recovery and enforcement activities are delivered in the most efficient and cost-effective manner. This will include the use of external suppliers of services such as tracing agents and enforcement agents and investigating the use of alternative suppliers of other recovery, legal and enforcement related services. Some of these services will be free to the council under the terms of the Enforcement Agent contract (2024). Requests can be made to the Income Collection & Enforcement Monitoring Officer. 15.2 The use of external agents will be conducted in accordance with the council's procurement policies.

15.2 We will seek to maximise the use of IT and technology to improve efficiency and consistency.

15.3 Service Level Agreements will be established where prompt service delivery is required between two separate but interdependent services to ensure that the debt recovery process is not delayed.

15.4 We will work with other recovery sections to maximise marketing opportunities, and efficiencies in promoting the 'take-up of direct debit (the council's preferred cost-effective method of payment), online payment and benefits etc, dealing with banking arrangements and other appropriate economies of scale.

16 Monitoring

16.1 We will monitor our policies and procedures to ensure that they are effective. Monitoring will include:

- collection rates – to identify our performance against the targets set for the collection of debts
- quality checks on work processes to ensure fairness and consistency
- audit and quality checks on work processed by individuals
- number of cases at each stage of the recovery process
- complaints received – to assist us with making service improvements
- setting of targets to improve performance
- consultation with our customers and with advice agencies
- regular monitoring of Service Level Agreements
- analysis of Advice Centre feedback/surveys to ensure that the service is customer focused
- monitoring of contracted services & performance management such as Enforcement Agents and Insolvency Solicitors

17 Review of this framework

17.1 The London Borough of Tower Hamlets is committed to continuous improvement and so it is inevitable that new approaches and ways of working will be introduced. This framework will be continually reviewed to enable it to be updated where necessary and to consider any service improvements or changes to legislation.