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## **FULL COUNCIL REPORT**

Date Written	28th April 2015
Report Author	Mike Parry
Service Area	Revenue
Exempt/Non Exempt	Non exempt
Committee Date	17 <sup>th</sup> June 2015

*To: Mayor, Ladies and Gentlemen*

# **CORPORATE SUNDRY DEBT RECOVERY POLICY**

### **PURPOSE OF THE REPORT:**

To seek Council approval for the implementation of an updated Corporate Sundry Debt Recovery Policy

## **1.0 INTRODUCTION AND BACKGROUND**

- 1.1 The proposal for the implementation of a Corporate Debt Recovery Policy was submitted and approved by Cabinet on December 13<sup>th</sup> 2006 and approved by Council on January 10<sup>th</sup> 2007.
- 1.2 The introduction of the Policy enabled all Directorates to fully understand their Corporate role and responsibilities, and participate in the debt recovery process.
- 1.3 The Policy has helped to significantly reduce sundry debt arrears levels.
- 1.4 The Policy was last reviewed in June 2011 and now is an appropriate time to update and further review the Policy which is attached at Appendix 1
- 1.5 Appendix C Identifies the changes in the Policy since the last review.

## **2.0 FINANCIAL IMPLICATIONS**

2.1 There are no financial implications for the Authority. However, maintaining and improving debt recovery will have a positive impact on the Council's budgets and assist in reducing the Corporate bad debt write off figure.

## **3.0 SINGLE INTEGRATED PLAN AND SUSTAINABILITY IMPACT SUMMARY**

3.1 The Single Integrated Plan & Sustainability Impact Assessment has been completed and the proposals positively impact on the Financial Sustainability of Public Services. No negative impacts have been identified.

## **4.0 EQUALITY IMPACT ASSESSMENT**

4.1 An Equalities Impact Assessment (EqIA) form has been prepared for the purpose of this report. It has been found that a full assessment is not required at this time. The form can be accessed on the Council's website/intranet via the Equality Impact Assessment link.

## **5.0 RECOMMENDATION(S) that**

5.1 The Corporate Sundry Debt Recovery Policy be approved.

5.2 The updated Policy be implemented with immediate effect.

**ELLIS COOPER**  
**CORPORATE DIRECTOR (PLACE & TRANSFORMATION)**

<b>BACKGROUND PAPERS</b>		
<b>Title of Document(s)</b>	<b>Document(s) Date</b>	<b>Document Location</b>
Equalities Impact Screening form	28 <sup>th</sup> April 2015	Electronic Library
Single Integrated Plan & Sustainability Impact Assessment	28 <sup>th</sup> April 2015	Electronic Library

***Consultation has been undertaken with the Corporate Management Team in respect of each proposal(s) and recommendation(s) set out in this report.***

**MERTHYR TYDFIL COUNTY BOROUGH COUNCIL**

**CORPORATE SUNDRY DEBT RECOVERY POLICY**

April 2015

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## **1. Introduction**

- 1.1 This document sets out the Council's policy for the recovery of Sundry Debts and Housing Benefit Overpayments. Effective debt management is crucial to the success of any organisation, and it is essential that Merthyr Tydfil County Borough Council (the Council) have clear policies and strategies to prevent debt occurring in the first instance, and to manage the recovery of the debt where prevention has failed. The Council must seek to recover all debts due and sustain collection rates, and where appropriate, provide advice and assistance to customers where cases of genuine hardship are involved.
- 1.2 The policy has been developed to ensure that all debtors are treated in a fair and consistent manner, taking account of the customers' personal and financial circumstances, but recognising the Council's responsibility to its many residents who pay their invoices on time. It provides advice and guidance to Council staff in respect of the administration of Sundry Debt invoices, procedures to be followed pre and post invoicing, and the recovery actions available to the Council to recover unpaid debt. A close working relationship between all Directorates across the Council is essential to establishing a co-ordinated approach to reducing debt levels. The development of documented procedures between the Debt Recovery section and Legal Department has had a significant impact in reducing corporate debt levels.
- 1.3 The policy document identifies the methods by which we aim to achieve continuous service improvement. By implementing recognised good practice, regularly reviewing working practices, and networking with other Local Authorities, these aims are achievable in the areas of debt referred to earlier.
- 1.4 Councillors need to be confident that the corporate debt is being effectively managed, as this will ultimately reduce the pressure on the Council's budget. Councillors will be provided with performance reports on a regular basis, at Portfolio Councillor and Service Management Board meetings. This process will provide Councillors with the assurance that recovery performance is being monitored regularly, and is subject to scrutiny at all times. In addition, the Debt Recovery section will provide senior Officers with performance information, as part of the monitoring process.
- 1.5 To comply with financial procedure rules, any changes to these policies or procedures must be reported to the Corporate Director (Place & Transformation) and the Chief Finance Officer for approval.

## **2. Policy Aims**

- 2.1 The following identify the key elements that will be adhered to in the issuing of debts and charges, and the recovery thereof:

- a) All Council invoices must be raised through the Agresso system (except those in respect of Housing Benefit Overpayments), and discharged by payment in full within the prescribed timescale; by instalment agreements approved by senior Debt Recovery staff; by appropriately authorised cancellation or write-off
- b) When invoices are raised, the originating department will ensure that the invoice is coded against the appropriate account number and cost centre
- c) "Cheque book" schools who raise invoices through their own systems will not be required to raise invoices via Agresso
- d) Every effort must be made to ensure that payments for goods or services provided by the Council should be received in advance, thereby avoiding the administrative costs incurred in the issuing of invoices, and pursuance of unpaid debts
- e) If a debtor fails to pay an invoice or charge, recovery procedures applicable to the type and value of debt involved shall be instigated
- f) The relevant Directorate will aim to identify potential debtors as early in the recovery process as possible, and fully consider the debtors ability to pay, thereby distinguishing between those who are unable to pay, and those who refuse to pay
- g) In cases where the debtor's circumstances identify financial hardship, they will be invited to apply for Housing Benefit or Council Tax Reduction.
- h) The customer has the responsibility to pay the debt in full as quickly as possible
- i) The Revenue section will pursue all debts owed to the Council, and aim to continuously improve collection rates. (Subject to the separate arrangements for the collection of Lifeline and Social Services debts as outlined in Appendix B).
- j) It will work in partnership with internal Directorates within the Council to deliver a co-ordinated approach to debt recovery, and to share information where the Data Protection Act or such other relevant legislation allows
- k) It will work in partnership with advice agencies to assist the customer wherever possible, especially in cases where hardship is identified
- m) Debts will only be written off when all other avenues of recovery have been exhausted, and where applicable, a report will be prepared for Cabinet. Irrecoverable debts will be written off against the corporate write-off provision, in accordance with the Council's write-off policy as referred to in Section 9
- n) The Council will treat all its customers consistently and fairly, irrespective of age, sex, gender, disability, ethnicity, race or sexual orientation, and will ensure that the customer's rights under the Equal Opportunities, Data Protection, Disability Discrimination and Race Relations Acts are protected.

### **3. Sundry Debts Administration**

- 3.1 The administrative responsibility for the collection and recovery of sundry debts lies with the Corporate Director (Place and Transformation). All sundry debt invoices are currently raised through the Agresso Debtors system, although some older outstanding debts were raised through the HBIM system
- 3.2 Additionally, all Housing Benefit overpayment invoices are raised through the Northgate Benefits system.
- 3.3 All Directorates must make every effort to obtain payment in advance for goods or services provided by the Council. Sundry Debt invoices must only be raised where payment in advance is not possible, or if it is inappropriate to invoice for the goods or service provided
- 3.4 If payments for goods or services are to be made by the "Miscellaneous Cash" facility, staff must check that an invoice has not previously been raised for the goods or services in question
- 3.5 Blacklists should be maintained by each department showing bad and doubtful debtors in order that no further debts are allowed to accrue

### **4. Agresso system procedures**

- 4.1 Unless otherwise agreed with the Revenues Manager, all invoice requests, refunds, cancellations, amendments must be made on the controlled stationery available from Business Services.
- 4.2 Each Directorate must identify staff responsible for inputting invoice requests, as on the recommendation of Internal Audit, no invoices are to be raised by the Debt Recovery section
- 4.3 When a Sundry Debt is raised, the full name of the individual, organisation, or trading name of the business, and the full address, including postcode, must be included on the Invoice Requisition Form. In the case of businesses, staff should request a copy of the company letterhead, or carry out a free check at Companies House, to verify the correct billing name. Incomplete names and addresses must not be used, as this will delay recovery of the debt, and in certain cases, render the debt irrecoverable
- 4.4 Invoices must include specific details of the goods or service provided, along with the contact name, department and telephone number of the individual raising the invoice, as this will help to reduce invoice queries

- 4.5 Where the invoice is addressed to a business or organisation, it must also include the name of an appropriate individual, department, directorate or section within that business or organisation as a point of contact, as this will assist the Debt Recovery section in pursuing the debt should it remain unpaid
- 4.6 The invoice must be raised within a maximum of 14 days after the goods or services have been provided, as this will assist the recovery process
- 4.7 It is vitally important that all supporting documentation relating to the invoice is retained by the Directorate raising the debt, as this will need to be provided to the Legal Department in the event of non-payment (see Para 6.18)
- 4.8 The invoice must provide details of the date payment is due, the various payment methods available, and how to contact the Debt Recovery section if there is a payment query
- 4.9 Invoices will be sent directly to the debtor by the Debt Recovery section, and will only be returned to the requesting Directorate in exceptional circumstances
- 4.10 Where practicable, amendments to Customer accounts will be carried out by an employee independent of the one responsible for raising the account.

## **5. Methods of Payment**

- 5.1 The Authority offers a number of payment facilities, which are as follows:
  - a) Cash or Credit/Debit card at the Civic Centre payment kiosk
  - b) 24 hour Automated Telephone Payment System by Credit or Debit Card.
  - c) Post – cheques and postal orders to the Civic Centre, payable to M.T.C.B.C..
  - d) Standing Order by arrangement with the Debt Recovery section.
  - e) Electronic payments via Council website
  - f) At Paypoint and Payzone facilities across the County Borough
  - g) Telephone payment via member of staff.

## **6. Recovery procedures (see summary in Appendix A)**

- 6.1 All final notices and subsequent correspondence will be written in plain English, and will include information on the consequences of non payment. Where a request is made for correspondence to be issued in a language other than English, the Council will make every effort to provide this information



- 6.2 A Final Notice will be issued 14 days after the raising of the invoice. Lifeline and Social Services invoices are excluded from this process. (see Appendix B)
- 6.3 If the debt remains unpaid on the expiry of the Final Notice, Debt Recovery staff should, if appropriate, attempt to contact the debtor by telephone to discuss the reasons for non-payment, and to advise them of the next stage in the recovery process (see Para 6.9)
- 6.4 Details of any calls or visits to the debtor must be recorded and retained within the Debt Recovery section
- 6.5 If a debtor has agreed a payment arrangement, staff will monitor payments on a regular basis, and instigate further recovery action should the arrangements be broken
- 6.6 Debt Recovery staff will use their discretion, and take the individuals financial circumstances into account when setting up payment arrangements
- 6.7 All payment arrangements must be completed within 12 months of the invoice date. The Revenues Manager or the Assistant Revenues Manager must approve any arrangements beyond that period
- 6.8 If the debtor does not agree to make payment, either in full or by arrangement, they will be advised in writing that legal action will commence in 7 days. This action could take the form of Bankruptcy proceedings in respect of debts over £5,000, and an application for a County Court Judgement in respect of debts under £5,000
- 6.9 If the debt remains unpaid, Debt Recovery staff will provide the Legal Department with information on outstanding invoices where legal action is appropriate
- 6.10 A joint decision will be made by the Legal Department and Debt Recovery section (in consultation with the client Directorate), on the appropriateness of pursuing the debt by legal action, based on the circumstances of the debtor, and the age and value of the debt
- 6.11 Consideration will always be given to the balance to be struck between the cost and amount of work involved in recovering the debt, and the value of the debt itself. At present, the Court fees for issuing debt claims are as follows:
- Up to £300 - £35 fee
  - £300 to £500 - £50 fee
  - £500 to £1000 - £70 fee
  - £1,000 to £1,500 - £80 fee
  - £1,500 to £3,000 - £115 fee

- £3,000 to £5,000 - £205 fee
- £5,000 to £10,000 - £455 fee
- £10,000 to £15,000 - 5% of the value of the claim
- £15,000 to £50,000 – 5% of the value of the claim
- £50,000 to £100,000 – 5% of the value of the claim
- £100,000 to £150,000 – 5% of the value of the claim
- £150,000 to £200,000 – 5% of the value of the claim
- Greater than £200,000 - £10,000

All methods of enforcing a County Court Judgement involve further costs. Insolvency proceedings involve fees which are payable to a Process Server.

- 6.12 Where appropriate, the Debt Recovery section will forward details of the debt to the Legal Department to commence legal proceedings. If the debt is not eventually recovered, any recovery costs incurred will be added to the debt to be written off against the corporate write-off provision.
- 6.13 At this stage, and only where it is legally permissible, any provision of goods or services to the debtor will be suspended until the debt has been paid in full.
- 6.14 If it is decided that legal action is not the most appropriate method of recovery, consideration will be given to forwarding the debt to an external collection agency, or to recovering the debt by other means.
- 6.15 In cases where the invoice is disputed, the Debt Recovery Section will request that the Directorate responsible for raising the invoice provide the Legal Department with all supporting paperwork relating to the invoice within 14 days.
- 6.16 The originating Directorate will then forward a complete file to the Legal Department, so that legal proceedings can commence without undue delay.
- 6.17 The Legal Department must be provided with the following information:
- i) The debtor's FULL name (including his/her title, and date of birth), or the trading name of the business/organisation, and FULL address (including postcode), as referred to in section 4.3, as this information will be required by the Courts
  - ii) In the case of limited companies, the Registered Office address of the business
  - iii) Copy of the invoice(s) and full details on what the debt relates to, including all supporting paperwork
  - iv) Details of any previous payment arrangements; part payments already received; exact current balance due; any disputes raised by the debtor about the invoice

- 6.18 If the information received by the Legal Department is incomplete, they will identify the additional information required, and return the file to the originating Directorate for completion.
- 6.19 If insufficient documentary evidence is available to the Legal Department to commence the necessary recovery action, consideration will be given to forwarding the debt to an external collection agency, recovering the debt by other means, or writing the debt off.
- 6.20 Any cost of enforcement action incurred by the Authority in recovering unpaid debts, will be charged to the corporate budget. Costs (disbursements) recovered from the debtor will be credited against these charges, but Solicitor's costs will be credited to the Legal Department, and will be deducted first from any money recovered from the debtor.
- 6.21 The Legal Department will proceed with the most appropriate action to recover the debt, advising the originating Directorate and the Debt Recovery section of progress on a regular basis.
- 6.22 The Local Authority will consider utilising County Court Judgements; Attachment of Earnings Orders; Warrants of Execution; Charging Orders; Bankruptcy (in the case of an individual), and Winding Up (in the case of a limited company), and any other powers available to it to recover a debt.
- 6.23 Senior staff at Director or Head of Service level may be required to attend Court as a witness on behalf of the Council, in cases that progress to County Court proceedings.

## **7. Use of Debt Collection agencies**

- 7.1 As referred to in Section 6 (Recovery procedures), there will be occasions when the Debt Recovery section and Legal Department will be unable to collect the debt. Examples are when legal action may not be the most appropriate method of recovery, or when resources are not available to pursue high numbers of outstanding debts.
- 7.2 The Debt Recovery Section will utilise the services of the Authorities internal Enforcement team or an external Debt Collection Agency. Where an external Agent is used, the following will apply;
- a) Agree a rate of commission for collection of the debts
  - b) Agree pay over schedules to the Authority for debts collected
  - c) Forward the relevant debts to the agency for collection
  - d) Monitor the performance of the agency concerned
  - e) Hold regular meetings with the agency to discuss performance and operational matters

- f) Have easy access to the agency's records to check on each debt with them
- g) Obtain sufficient documentary evidence from the agency on debts to be written off
- h) Debts that the Agency has failed to recover will NOT be referred back to the Legal Department for further action.

## **8. Housing Benefit Overpayments**

- 8.1 The Housing and Council Tax Benefit section has a Benefit Overpayment Recovery Policy, which was approved by Council in November 2014
- 8.2 The policy is available in electronic or hard copy version from the Benefits Manager.
- 8.3 The Overpayment Policy is reviewed annually, and reflects the development of documented procedures between the Debt Recovery section and Legal Department, which takes the Corporate Sundry Debt Recovery Policy into account

## **9. Write-off procedures**

- 9.1 As outlined in Section 4.07.09 of the Council's Constitution (December 2014), the Director of Customer Services has the authority to write off irrecoverable debts under £1000. For Audit purposes, a report identifying all debts written off under this amount will be agreed and countersigned by the Chief Finance Officer. All irrecoverable debts to be written off over the value of £1000 will be the subject of a report to Cabinet
- 9.2 It is inevitable that certain debts raised by the Authority will eventually be written off, due to the fact that it is uneconomical to pursue the debt further; because the debtor is untraceable or deceased; because they do not have the financial resources to pay; or because the debt becomes statute barred.
- 9.3 Prior to write off, every effort must be made to recover the debt in full or part, as written off debts place an annual burden on the Authority's budgets.
- 9.4 A list of all debts that are being nominated for write off will be circulated to Directors and Heads of Service, to identify the debts raised by their service area, and to approve them for write-off
- 9.5 This list will include the debtors name and address; invoice number and amount; current balance of invoice and reason for write off.

- 9.6 Other than those debts where Officers have delegated powers, this list will form the basis of the write off report to Cabinet/Council, in accordance with the Authority's Financial Regulations
- 9.7 The report to Cabinet/Council will include where appropriate, the debtors name and address; invoice number and amount; current balance of invoice; reason for write off
- 9.8 It is important that the following procedures are followed before a debt is written off, to ensure that every avenue has been explored in attempting to obtain payment:

**9.8a – Untraceable/No forwarding address**

If correspondence has been returned identifying that a debtor is no longer living at their last known address, the procedures below must be followed:

- i) Council Tax records should be checked for a forwarding address
- ii) A debtor name search should be carried out against the most recent Electoral Register
- iii) Appropriate tracing agencies such as Experian should be contacted to check for forwarding addresses, or any other information they may hold
- iv) Where it is known that the debtor is in employment, their last known employer should be contacted
- v) Internal Directorates within the Council should be contacted for information they may hold on the debtor
- vi) Where appropriate, visits should be made to the last known address (if within the County Borough), and enquiries made at neighbouring properties – details of these visits must be recorded and retained within the Debt Recovery section
- vii) If none of the above is successful in tracing the debtor, the debt should be nominated for write off in accordance with the Authority's Financial Regulations

**9.8b – Low Value Debts (under £100.00)**

It may be uneconomical for the Authority to pursue such debts, as the administrative costs incurred may exceed the value of the debt. There will be exceptions, such as it being part of a multiple debt for an individual or a company, and these will be pursued in accordance with the Recovery Procedures referred to in Section 6. However, in most cases, such debts will be forwarded to a Debt Collection Agency for recovery (see Section 7) as legal action may not be appropriate, but if the agency is unsuccessful in recovering the debt, it should be nominated for write off.

In such instances:

- i) The Directorate raising the debt should be advised of the intention to write the debt off
- ii) The writing off of the debt must be approved by an appropriate senior officer
- iii) The debt should be nominated for write off in accordance with the Authority's Financial Regulations

#### **9.8c – Refunds**

Before a refund of an overpayment is authorised, the debt recovery section will ensure there are no other balances outstanding. Where other balances are identified, any credit due will be offset against it.

#### **9.8d – Deceased Persons**

Prior to writing off debts for a deceased person, the procedures below must be followed:

- i) Interest in the deceased person's estate must be registered, and a claim made through the Executors
- ii) If there are no funds available in the estate, the debt should be nominated for write off in accordance with the Authority's Financial Regulations

**ELLIS COOPER  
CORPORATE DIRECTOR (PLACE & TRANSFORMATION)**

## Appendix A

### Recovery Cycle for debts where legal action is appropriate

DAY NUMBER	ACTION	DETAILS
1	Invoice issued	Includes details of goods/services supplied
15 (as practicable)	Final Notice issued	As above, but also advises payment is overdue and legal action will be taken
22 onward	Phone contact with debtor	To advise of further action if payment not received immediately
29 onward (as practicable)	7 day letter	Letter advising that legal action will commence in 7 days if the debt remains unpaid
44 onward (as practicable)	Referred to Legal Department	Request that Statutory Demand is issued immediately
	OR	
	Debt referred to Collection Agency	
45 onwards (as practicable)	Formal legal action commenced	Debt Recovery section will contact originating Directorate, requesting that full details of outstanding debt, including all supporting paperwork, be forwarded to the Legal Department within 14 days

## **Appendix B**

As per the agreement between the Director of Customer Services and the Chief Finance Officer, lifeline invoices are not produced automatically from Agresso as with other invoices. The Customer ID will be suppressed so that reminders are not produced.. Monitoring of accounts and the issue of reminders and further recovery notices will be the responsibility of the lifeline department

## **IAS Invoices**

As per the agreement between the Director of Customer Services and the Chief Finance Officer, IAS invoices will follow the recovery cycle set down in Appendix A, up to and including the issue of a 7 day letter. Due to potential vulnerability issues, all IAS accounts will be referred back to the issuing department at this stage for further instruction.

Additionally, IAS accounts may be manually suppressed prior to the 7 day letter stage at the request of the issuing department. This may be due to potential vulnerability or other issues relating to the account. Monitoring of accounts will be the responsibility of the IAS Department

## **Appendix C**

### **Details of Policy Changes;**

1.5 (Revise)

Director of Customer Services to Corporate Director (Place and Transformation)

2.1 (g) (Revise)

Housing to Housing Benefit

Council Tax Benefit to Council Tax Reduction

2.1 (i ) (Addition)

Subject to the separate arrangements for the collection of Lifeline and Social Services debts as outlined in Appendix B

2.1 (l) (Remove)

Heads of Service and staff responsible for monitoring debt levels within their own Directorate will run regular system reports for their service areas, thereby assisting the debt monitoring process

2.1 (m) (Revise)

Councillors to Cabinet

3.1 (Revise)

Director of Customer Services to Corporate Director (Place and Transformation)

3.4 (Revise)

Yellow Cash to Miscellaneous Cash

3.5 (Remove)



Staff within each Directorate who monitor the monthly reports referred to in 2.1 I), will liaise with the Debt Recovery section to determine if appropriate recovery action is required

### 3.5 (Addition)

Blacklists should be maintained by each department showing bad and doubtful debtors in order that no further debts are allowed to accrue

### 4.1 (Remove) write - offs

Unless otherwise agreed with the Revenues Manager, all invoice requests, refunds, cancellations, amendments or write-offs must be made on the controlled stationery available from the Debt Recovery section

### 4.1 (Revise)

Debt Recovery Section to Business Services

Unless otherwise agreed with the Revenues Manager, all invoice requests, refunds, cancellations, amendments or write-offs must be made on the controlled stationery available from the Debt Recovery section

### 5.1 (a) (Revise)

Cash or Credit/Debit card at the Civic Centre payment kiosk

### 6.2 (Revise)

Lifeline and Social Services invoices are excluded from this process (see Appendix B)

### 6.8 (Revise)

£750 to £5,000

### 6.11 (Revise to current fee structure)

- Up to £300 - £35 fee
- £300 to £500 - £50 fee
- £500 to £1000 - £70 fee
- £1,000 to £1,500 - £80 fee
- £1,500 to £3,000 - £115 fee
- £3,000 to £5,000 - £205 fee
- £5,000 to £10,000 - £455 fee
- £10,000 to £15,000 - 5% of the value of the claim
- £15,000 to £50,000 – 5% of the value of the claim
- £50,000 to £100,000 – 5% of the value of the claim
- £100,000 to £150,000 – 5% of the value of the claim
- £150,000 to £200,000 – 5% of the value of the claim
- Greater than £200,000 - £10,000

### 7.2 (Revise)

On occasions such as this, the Debt Recovery section will utilise the services of a Debt Collection Agency, and:

Revise to;

The Debt Recovery Section will utilise the services of the Authorities internal Enforcement team or an external Debt Collection Agency. Where an external Agent is used, the following will apply.

8.1 (Revise)

December 2005 to November 2014

9.1 (Revise)

(April 2007) to (December 2014)

Director of Customer Community Services to Director of Customer Services

Appendix A (Revise)

7 day letter – day number, revise from 37 onward to 29 onward

Appendix B (Addition)

### **IAS Invoices**

As per the agreement between the Director of Customer Services and the Chief Finance Officer, IAS invoices will follow the recovery cycle set down in Appendix A, up to and including the issue of a 7 day letter. Due to potential vulnerability issues, all IAS accounts will be referred back to the issuing department at this stage for further instruction.

Additionally, IAS accounts may be manually suppressed prior to the 7 day letter stage at the request of the issuing department. This may be due to potential vulnerability or other issues relating to the account. Monitoring of accounts will be the responsibility of the IAS Department