

The Taking Control of Goods (Fees) Regulations 2014

National Policy

Recovery of fees from vulnerable debtors

Where the debtor is a vulnerable person, the fee or fees due for the enforcement stage (or, where regulation 6 applies, the first, or first and second, enforcement stages as appropriate) and any disbursements related to that stage (or stages) are not recoverable unless the enforcement agent has, before proceeding to remove goods which have been taken into control, given the debtor an adequate opportunity to get assistance and advice in relation to the exercise of the enforcement power.

Taking Control of Goods: National Standards

Vulnerable situations

Enforcement agents/agencies and creditors must recognise that they each have a role in ensuring that the vulnerable and socially excluded are protected and that the recovery process includes procedures agreed between the agent/agency and creditor about how such situations should be dealt with. The appropriate use of discretion is essential in every case and no amount of guidance could cover every situation. Therefore the agent has a duty to contact the creditor and report the circumstances in situations where there is evidence of a potential cause for concern.

If necessary, the enforcement agent will advise the creditor if further action is appropriate. The exercise of appropriate discretion is needed, not only to protect the debtor, but also the enforcement agent who should avoid taking action which could lead to accusations of inappropriate behaviour.

Enforcement agents must withdraw from domestic premises if the only person present is, or appears to be, under the age of 16 or is deemed to be vulnerable by the enforcement agent; they can ask when the debtor will be home – if appropriate.

Enforcement agents must withdraw without making enquiries if the only persons present are children who appear to be under the age of 12.

A debtor may be considered vulnerable if, for reasons of age, health or disability they are unable to safeguard their personal welfare or the personal welfare of other members of the household.

The enforcement agent must be sure that the debtor or the person to whom they are entering into a controlled goods agreement understands the agreement and the consequences if the agreement is not complied with.

Enforcement agents should be aware that vulnerability may not be immediately obvious.

Some groups who might be vulnerable are listed below. However, this list is not exhaustive. Care should be taken to assess each situation on a case by case basis.

- the elderly
- people with a disability
- the seriously ill
- the recently bereaved
- single parent families



Collect Services Limited Vulnerable Persons Policy

1.0 Introduction

Regulation 12 of the Taking Control of Goods Regulations 2013 provides that “where the debtor is a vulnerable person, the fee or fees due for the enforcement stage and any disbursements related to that stage (or stages) are not recoverable unless the enforcement agent has, before proceeding to remove goods which have been taken into control, given the debtor an adequate opportunity to get assistance and advice in relation to the exercise of the enforcement power.

Additionally, regulation 4 of the Taking Control of Goods Regulations 2013 prescribes classes of exempt goods.

Examples of debtors that may be vulnerable include but are not necessarily limited to the following:

- Those with communication or learning difficulties,
- Pension credit age debtors,
- Disabled persons or those with physical or mental impairment,
- Pregnancy,
- Recently bereaved,
- Individuals with serious illnesses and long term sickness,
- Single (one) parent family,
- Any other circumstances where enforcement of a warrant of control will lead to exceptional hardship.

2.0 Responsibilities

Overall responsibility for our Vulnerable Debtor Policy rests with the Managing Director.

Senior Managers and employees shall be responsible for implementation and application of the policy arrangements.

The Administration Manager shall be responsible for ensuring that the Company Quality Manual, Procedures and Work Instructions are maintained in relation to this policy.

3.0 Training and Awareness

The Company policy for vulnerable debtors is communicated to all employees during their induction training when they first join the organisation. Additionally, the contract familiarisation training provided when we take on a

new contract focuses on the specific requirements for vulnerable debtors for the client concerned. It is also important that adequate training is provided to any casual, temporary and agency employees and those entering Company employment who may not be aware of the high standards required. It is Senior Managers responsibility to ensure that staff are adequately trained to fulfil their duties.

Effective arrangements are also enshrined within the Company's Quality Manual and Procedures established and maintained in accordance with ISO9001 and routinely audited by an external ISO auditor for compliance.

4.0 Methods for Determining Potential Vulnerability

Establishing potential vulnerability commences as soon as we receive an instruction from a client whereby we cross-check debtor details against other records that we hold and databases that we have access to.

We recognise that establishing debtor vulnerability can occur at any stage of the process. Consequently, all our operational personnel are trained to assess whether there is a potential vulnerability and to follow defined procedures where such cases are identified as set out within our ISO9001 Quality System and client specified service requirements.

We aim to determine vulnerability as far as reasonably practicable at the compliance stage to minimise cost and the potential distress that a visit might otherwise cause. Our written communications to debtors provide free contact advice and information numbers and addresses that they might utilise. We also shall seek to determine potential vulnerability when either we phone a debtor or their representative at the compliance stage or if they phone us through questions and the responses given.

Where pre-existing records or a phone conversation with the debtor or their representative at the compliance stage indicate that they are or may be "vulnerable", we will discuss the facts of the case with the Council with a view to determining how or whether to proceed. This will be undertaken for each individual debtor that appears to be vulnerable. Where appropriate and agreed with the Council, we will seek to establish a payment arrangement with the debtor or their authorised representative that accords with their financial and personal circumstances.

5.0 Recording "Vulnerability"

In all situations where it appears that a debtor may be vulnerable, we shall ensure that their case record is updated on our OneStep computer system and that an exclusion indicator is added to prevent automated case progression and to permit manual intervention and review. Debtor "vulnerability" details will be accessible to authorised Council employees via our secure "ClientWeb" facility and a bespoke report for all debtors identified as vulnerable may be produced for review and / or audit of the cases concerned.

6.0 Enforcement Visits

When conducting a visit, our Enforcement Agents shall carry and show to a debtor their relevant forms of identification and authority to act on behalf of the Council. Where a potentially vulnerable debtor is identified through a visit, the Enforcement Agent will contact the Council immediately to give the details of the case and advice as appropriate on whether or not to proceed.

Each case shall be considered on its own merits but with reference to the statutory framework and National Standards for Enforcement Agents. Advice on whether to proceed shall include but not be limited to the circumstances of the debtor, other occupants in the premises concerned, alternative options available to the Council, the amount of the debt to be paid, the period that the debt has been outstanding and any previous communications with the debtor,

Our Enforcement Agents shall withdraw from domestic premises if the only person present is, or appears to be, under the age of 18 or is considered to be vulnerable as per the specification. Enforcement agents shall also withdraw without making enquiries if the only persons present are children who appear to be under the age of 12. A debtor may be considered vulnerable if, for reasons of age, health or disability they are unable to safeguard their personal welfare or the personal welfare of other members of the household.

If a Client should require enforcement action to proceed in relation to a vulnerable debtor, we will ensure that the vulnerable person is given sufficient timescale according to their circumstances to get help and advice. This will occur before any enforcement fees are charged or goods removed and we will also give them contact details for the types of organisation that may be able to assist them.

We will not enter into a controlled goods agreement with a vulnerable debtor where it appears that they may not understand the effect of the agreement. Where such a situation occurs, the agreement may be entered into with another adult authorised by the debtor and we shall ensure that they understand the agreement and consequences if it is breached. We shall also ensure that any payment schedule agreed with a debtor or their authorised representative is reasonable and appropriate and has due regard to their income, expenditure and circumstances.

We will not take control of any goods that are exempt under statute including for example:

- any item or equipment reasonably needed for the medical care of anyone in the household,
- any item or equipment reasonably needed to care for anyone under 18, a disabled person or an older person,
- assistance dogs, including guide dogs, hearing dogs and dogs for disabled people,
- a vehicle displaying a valid disabled person's blue badge.

7.0 Approaches to vulnerability

We shall also apply the following provisions for vulnerable debtors under our Company policy:

- Where a debtor has been identified as potentially vulnerable, we will liaise with a nominated representative directly if agreed by the Council and the debtor provides a written permission to do so. This could include for example the Citizens Advice Bureau, Age Concern or a relative of the debtor.
- For debtors that have a hearing impairment, we operate a portable Minicom facility. We may also liaise with local organisations such as the RAD or RNID to assist with any communications where these are authorised.
- In cases where a debtor has a sight impairment or is blind we offer the facility of documentation in large print or Braille and may produce information on CD or Tape where appropriate.
- Where it appears that a debtor may have language difficulties, we will seek the assistance of a local translation service.
- Where we believe that a debtor may be entitled to financial assistance, we will inform them accordingly. Where this is a Council provided benefit such as Housing Benefit or Council Tax Support, we will inform the Council. In cases where a debtor may be entitled to a welfare benefit, we will refer them to the appropriate agency to enable further guidance to be obtained.
- If a visit identifies a debtor as being seriously ill, we will contact the emergency services for assistance and our representative will remain with the debtor until the emergency services arrive.
- If the circumstances of the debtor are such that they require other support or action, we will refer them to the appropriate support agency to enable the appropriate advice and support to be effected.
- If we identify a vulnerable debtor that we believe requires urgent support, we may make urgent contact with either the Local Authority in order that Social Services may assist or a third party organisation such as 'Help the Aged'. If the situation is an emergency we will contact the emergency services.
- In cases where a debtor is severely mentally impaired, we would seek Council advice as to whether they may be eligible for a Council Tax discount or exemption. We would also seek to ascertain contact details of any third party support worker such as a Community Psychiatric Nurse or the Local General practitioner.
- Where a visit identifies that the debtor has recently passed away, we may according to the situation, seek a copy of their death certificate, relevant

contact details for executors of the will and any details of solicitors who may be involved in the estate.

- Where our representative identifies a residence with young children and cases where severe social deprivation appear present or in our representative's professional judgement there may be potential child safety issues, we shall contact the Council as an immediate priority. If in any situation where an Enforcement Agent visits a property and is greeted by a child or young person, they shall ask when their parent may be in provided that the child does not appear to be under 12. If the child appears to be under 12, we shall leave the premises immediately. In any case, we shall make arrangements to contact the debtor at another time. In situations where another adult is supervising the young children, we will leave our contact details in a sealed envelope marked for the attention of the debtor. In situations where we find young children left unsupervised and consider that there may be social concerns for their welfare, we will notify the Council immediately.
- We will have due regard to the 9 protected characteristics of the Equality Act 2010 in fulfilling our obligations to Local Authority clients to mitigate against the potential for any adverse impact arising from our activities.

8.0 Commitment and Review

Collect Services Limited is committed to the establishment and maintenance of high standards. The Company is determined to ensure that these arrangements are effectively maintained and shall apply a continuous review of its systems and procedures to ensure that this policy remains effective.

This policy statement shall be reviewed at least once a year by the Company Board of Directors.

Vulnerable Persons Policy

Equita appreciate that in the course of our work we often come into contact with potentially vulnerable debtors. We believe that to deliver a truly ethical approach in delivering a service that is extremely sensitive, the commitment has to permeate throughout all activity of the business as a whole. We believe that the adoption and application of the right policies, standards and approach will deliver an ethical approach in a practical and measureable way.

As a result, we work in line with advice given by the Civil Enforcement Association (CIVEA), together with the *Taking Control of Goods; National Standards 2014* when dealing with vulnerable people. They are both quite clear in stating that enforcement agencies, their employees and creditors must ensure that the genuinely vulnerable and socially excluded are protected. This statement should be considered in conjunction with the company's Code of Practice policy.

What is a Vulnerable Person?

Those who might be potentially vulnerable include anyone over the age of 18, who:

- Is elderly, frail or confused
- Has a physical or sensory impairment
- Has a learning disability or mental health problem
- Is seriously ill
- Is recently bereaved
- Is a single parent family
- Is in the latter stages of pregnancy
- Has obvious difficulty in understanding, speaking or reading English

Equita define vulnerable through:

- Taking Control of Goods: National Standards
- Councils' own definition
- CIVEA's code of practice and guidelines
- The Royal College of Psychiatrists and the Money Advice Trust's guidelines (Debt collection and mental health-ten steps to improve recovery)

Equita also give full consideration to any other mitigating or vulnerable conditions and seek the advice and approval of our clients before proceeding with any recovery action.

Our Code of Practice when dealing with Vulnerable Customers is as follows

Equita recognise that we have a role in ensuring that the vulnerable and socially excluded are protected and that our recovery process includes procedures agreed between the company and the client about how such situations should be dealt with and the care taken.

Under new legislation, contained within the “ Tribunal, Courts & Enforcement Act 2007”, “The Taking Control of Goods Regulations 2013” and “The Taking Control of Goods (Fees) Regulations 2014”, in force from April 6th 2014, potential vulnerability may be identified at:

- Compliance stage – by our Customer Service Team, Investigation Officer or CAB or other similar agency; or
- Enforcement stage – by an Enforcement Agent, Investigation Officer or CAB or similar agency

Prior to Receiving a Case

We work in partnership with our clients by holding regular workshops to identify any potential vulnerable debtor’s cases that will be passed over to us.

Once we have Received a Case

Cases identified prior to receiving a case are automatically flagged up on our collections system as soon as they are entered, and dealt with as per client specification and codes of practice and our own code of practice. Our system interfaces, available to all clients, retains employment and benefit details enabling Equita to extract the information to assess each debtor and identify vulnerable debtors.

Compliance Stage

At Compliance stage, potential vulnerability may be identified:

- from our initial debtor profiling
- as a result of a telephone conversation with the debtor
- by debtor or CAB (or similar agency) advising us
- as a result of a response to our initial Notice of Enforcement
- as a result of a Investigation Officer visit

Where it is believed at this stage that a debtor may be vulnerable, we will put the case on hold immediately and cease current action and advise the council. We will seek further evidence/information such as the supply of Income Support and Job Seekers Allowance through the inclusion of specially designed forms so that a report can be submitted to the council with our findings.

Special scripts are used (approved by our clients) to identify if the calling debtor falls into a vulnerable group and our highly trained tactful contact centre operators and customer facing staff will respond accordingly to the information given with all details recorded against the debtors case.

To assist with clarifying the situation we may ask our Investigation Officer to visit to assess the circumstances. If as a result of our enquiries, evidence of vulnerability is produced and the council accept that the debtor is vulnerable we will return the case to the council. If no evidence is received and the council do not consider the debtor is vulnerable we will continue to the enforcement stage.

Enforcement Stage

At Enforcement stage, potential vulnerability may be identified:

- by the Enforcement Agent
- by debtor or CAB (or similar agency) advising us
- as a result of a Investigation Officer visit

All our Enforcement Agents and Investigations Officers are hand-picked to work for a specific client; have all been fully trained in these areas and are well experienced in enquiring sensitively in such matters and respond accordingly. Agents will also advise of our debt advice pack, home visiting service and the mobile surgery availability.

Where it is believed at this stage that a debtor may be vulnerable, we will put the case on hold immediately and cease current action and advise the council. The Enforcement Agent will seek further evidence/information so that a report can be submitted to the council with our findings. To assist with clarifying the situation we may ask our Investigation Officer to visit as well to assess the circumstances. If as a result of our enquiries, evidence of vulnerability is produced and the council accept that the debtor is vulnerable we will return the case to the council. If

no evidence is received and the council do not consider the debtor is vulnerable we will continue with action and request payment either in full or make an instalment arrangement with the debtor.

At all stages wherever vulnerability is identified we may also signpost the circumstances to CAB or similar agencies. In addition our letters to the debtor will highlight where impartial and free debt advice can be obtained (i.e. National Debtline, Money Advice Service, CAB etc).

Minors

Enforcement Agents will withdraw from domestic premises if the only person present is, or appears to be, under the age of 18. They can ask when the debtor will be home or if they are present - if appropriate.

Enforcement agents will withdraw without making enquiries if the only persons present are children who appear to be under the age of 12.

If the enforcement agent withdraws from the premises because no responsible adult is present, a report will be made via their tablet and placed on the computer system. The enforcement agent will plan to visit on another occasion. A letter may be left for the debtor by posting it through the letter box or leaving it in a prominent place, if appropriate. The enforcement agent will not involve the minor into taking responsibility for the letter.

Children

During the course of their duties, Enforcement Agents and other staff may come across situations where they consider that a child may be in a vulnerable situation in their home circumstances, and may have suffered abuse or neglect. To deal with such situations, Equita has a Child Protection Policy and recognise that all staff have a role to play in this. Enforcement Agents or other employees will highlight any concerns that they have or may see on their visits and in the course of their duties.

It is very difficult to sometimes identify individuals in some of these categories, but our Enforcement Agents are trained with the softer skills, together with awareness, and as a matter of course will explain processes, at every stage, when

talking to the debtor. If, during their visit, the Enforcement Agent feels that there is a real lack of understanding (learning difficulties) or fulfils one of the vulnerable categories, they will withdraw from the property and then report back to the office. A report will be made and placed on the computer system. The Council will be notified within 24 hours and a hold will be placed on the account until further instruction is received if the Enforcement Agent had not already contacted the Council via telephone.

If required or the situation is not very clear, our Investigation Officer will visit to assess the situation and also try and give further assistance if possible. If they feel that the person is vulnerable they will then contact the Council for advice or recommend the case to be returned.

Avoiding Fees being applied on Cases of Vulnerability

We seek to engage with all debtors at the earliest possible stage in the recovery cycle to find the most effective and fair payment plan and facilitate payment of the debt as early as possible.

Where possible an arrangement to pay the debt will be agreed. Where this necessitates a longer period that falls outside of the Council's specification we will seek authorisation from the Council before agreeing the payment plan.

We will seek to agree a payment plan that is realistic and encourage the use of the cheapest payment option. Where payment is not maintained we will issue postal, telephone and SMS text reminders before taking any action that may incur additional charges.

We seek at all times to ensure that the vulnerable meet their payment obligations (if possible) but do not incur charges that make their situations worse.

Discretion

The appropriate use of discretion is essential in every case and no amount of guidance could cover every situation, therefore we have a duty to contact our client and report the circumstances in situations where there is potential cause for concern. If necessary, the Enforcement Agent will advise the client if further action is appropriate. The exercise of

appropriate discretion is needed, not only to protect the debtor, but also the Enforcement Agent who should avoid taking action which could lead to accusations of inappropriate behaviour such as a lone female becoming distressed.

Equita offer clients a service that evolves and reflects the general financial environment in which we work. In a current climate where individual's financial circumstances can deteriorate with little warning, we have the flexibility in our approach to ensure that we are sensitive to these changes.

In an environment where an individual's circumstances may change through no fault of their own, due to redundancy or a drop in hours worked, we have completed a process where such individuals are dealt with sympathetically and with maximum flexibility. Recent refresher training courses have focused on enabling staff to indentify and deal considerately with such individuals. We are working with clients in reviewing and updating collection guidelines to reflect the current environment and establish escalation routes for those affected by the recession. We are constantly working with clients and relevant organisations in reviewing our list of vulnerable individuals to ensure that people who may recently through no fault of their own, experience extreme hardship are identified and action tempered to reflect this.

Equita has the following in place to assist vulnerable customers:

- Free phone & local rate contact numbers
- Provide a variety of communication and payment methods
- Direct dial numbers for CAB and other advice agencies
- Debt recovery pack including budget forms to help debtors take back control of their finances
- Providing translation services to those whose first language is not English
- All Enforcement Agents carry language identification cards
- Language line/language matrix
- Interpreters
- Sign language available
- Braille and large print letters
- Debt advice hotline
- Free payment options
- Home visits

- Local surgeries

All staff are intensively trained, display a positive attitude and are considerate to customers in financial difficulties, responding sympathetically to their difficulties and encouraging them to obtain guidance from a debt advisory organisation.

Through regular dialogue with customers and advisory bodies we will ensure that enforcement staff are kept up to date with any changes in our collection policy and carry the most up to date contact details for advisory groups within each area. We are skilled in achieving the correct balance between maximising payments whilst ensuring that the most vulnerable are treated sympathetically and will work with the council in shaping a collections policy that mirror's the council's own corporate approach.

Staff Training

It is essential to ensure all employees likely to be dealing with such groups are given the correct training and attend the following courses which are readily available to Equita:

- Introduction to Benefits
- Welfare Benefits Overview
- Practical Solutions to Common Benefit Problems
- Identifying the Vulnerable
- Assisting the Vulnerable
- Customer care
- Providing fair and sensitive treatment in vulnerable conditions
- How to identify various individual and group behaviours
- Understand prejudices and discrimination
- Appreciate the difference between diversity and equal opportunities
- Understand the law on equal opportunities in the workplace
- Identify different types and possible effects of harassment and discrimination
- Apply different methods in dealing with discriminatory situations
- Apply an equal opportunities approach to your job
- Cross Cultural Communication – history, meaning and relevance.
- The impact of cultural values on business norms, practices and behaviours.

- Examples of the positive and negative manifestations of cross cultural differences
- Equality, Diversity & Human Rights Legislative Training
- Race and Equality Relations
- Cultural awareness in the UK
- The mentally healthy workplace
- Discrimination, language, and labelling

Specialised Staff

Equita have specialised staff who have had previous experience and/or advanced training on all aspects of vulnerability to include:

- Learning difficulties
- Deaf
- Disabled
- Ethnic minorities

Enforcement Agents & Customer Facing Staff Specific Training

Equita's training course given to all Enforcement Agents' is the highest quality in the industry and is County Court and IRRV approved, therefore making our team of Enforcement Agents the finest in the UK. The training course includes comprehensive modules on identifying and dealing with vulnerable debtors. Following the Enforcement Agents comprehensive and intense training they are tested and signed off by senior management before commencing practical training with a senior Enforcement Agent.

All Enforcement Agents and Investigations Officers are intensively trained on identifying and dealing with varying categories of the vulnerable and have also received training on safeguarding children. All Enforcement Agents and Investigations Officers carry a handbook which includes guidelines on identifying and dealing with vulnerable people that they can refer to at any time.

All staff are sensitive, use discretion and treat each case individually. Enforcement Agents motto is *'if you are unsure of the debtors vulnerability always seek advice from the Council'*.

Dealing with Vulnerable Debtors – Customer Contact Centre

All operators within our Customer Contact Centre are intensively trained prior to commencing their duties, with particular regard to customer service and identifying and dealing with vulnerable debtors. Their training includes using type talk and text talk for the deaf and guidelines from MIND in identifying and communicating with people who show signs of having mental health problems. Training also includes dealing with debtors who struggle to speak English and dealing with ethnic minorities and cultural and diversity awareness.

Operators use discretion and record all details of the call on the case file. If a vulnerable debtor is identified the operator follows our clients and Equita's guidelines and codes of practice and seek further advice on the conclusion of the call swiftly and sensitively.

Office Visits

Equita use specialist trained staff within their local offices who have advanced training in dealing with the vulnerable. We ensure at least one member of staff at each site are able to use basic sign language and the whole staff speak a variety of languages and have access to translation and interpreting services.

Correspondence Received (i.e. emails, letters)

Staff dealing with communications from debtors are always on the alert to identify vulnerable debtors and use information given by a debtor to update the case and, wherever necessary, return the case under client guidelines or seek advice from our client. Sensitivity and discretion is always used and our client updated on any situation where a vulnerable debtor has been identified.

Dealing with Categories of Vulnerable Debtors

Pregnancy or recent birth of a child

Where the debtor states that they are in the advanced stages of pregnancy and/or have very recently given birth to a child, the operator will carefully assess the persons financial position and/or support structure before requesting payment of the arrears. Where the operator considers the person may be vulnerable they will place the case on hold and seek further advice from the client. This may result in the client withdrawing the case and or a long term arrangement

being agreed. The outcome will be communicated to the debtor with 48 hours.

Recent bereavement

It is a requirement of all contact centre staff to deal sympathetically with any debtor who may have suffered a recent bereavement to an immediate family member. Where the operator is advised of the bereavement, they should seek to confirm the details and place the account on hold for a minimum period of 28 days and/or seek to establish an arrangement to clear the arrears if this is appropriate.

Recent unemployment

Equita recognise that in the current economic climate debtors may be unexpectedly made redundant without warning. Where contact is made the operator will seek to establish the precise position regarding benefits and other household income. Where appropriate the debtor will be referred to an advisory group such as the CAB or Money Advice for a completion of an income and expenditure analysis. Where the debt is the subject of an arrangement and payments have previously been maintained the operator may consider varying the arrangement to reflect the debtor's new circumstances.

Serious illness/long term sickness

Where contact is made with the contact centre by either the debtor or a carer acting on their behalf, full details of the illness will be obtained and the case placed on hold pending discussion with the client. If the illness or sickness is considered to be most serious, the case will be returned to the council immediately and the caller provided with contact details at the client to discuss the most appropriate way forward.

Severe financial difficulties

On contact being made with the debtor our customer contact staff will seek to complete an income and expenditure form that is designed to establish what total liabilities the debtor may have, what priority debts and what payments may be made against the debt. Where an individual claims to be in such severe financial difficulties that they cannot make any payments, they will be referred to a local advisory body, however the Enforcement Agent may make an appointment to visit the debtor to obtain clear information regarding their status.

Ethnic minorities who cannot understand or speak English

Equita appreciate that on occasions the customers' first language will not necessary be English. The Enforcement Agent will not abuse the trust of vulnerable customers whose first language may not be English. The Enforcement Agent identify themselves by showing their ID card and will attempt to find out if there is an adult English speaker in the property. The enforcement agent will always obtain permission before speaking to someone else.

Sometimes it is difficult to identify a language but Equita have a variety of methods to encourage communication.

Enforcement Agents (and customer facing office staff) carry a Language Identification Form where the debtor points to one of the 211 languages which allows the Enforcement Agent to contact the interpreter for that language via the following methods:

- Via our internal language matrix of 43 languages
- Via our Interpreter Service
- Via our translation line
- Via Enforcement Agents translators installed in their mobile phones (for debtors who speak a little English)

Our Customer Contact Centre operators are trained in identifying various languages and attempt to ascertain which language the debtor speaks via a list of language nationalities (showing pronunciation) e.g. Francais (fransays) – French or Espanol (espanyol) – Spanish.

Once the language is identified, communication can then commence via the following:

- Via our internal language matrix of 43 languages
- Via our Interpreter Service
- Via our translation line

Making contact with any of the above is swift (average around 13 seconds) so it allows us to keep call times down.

Any Other Guidelines stipulated by our Client

At the commencement of the contract, Equita will agree with the Council the precise definition of vulnerability that is sensitive to any local issues. This will be communicated to all frontline staff who will identify any who fall within the

category at the earliest possible stage in the process. Where contact is made with our contact centre and an operator is made aware of a potentially vulnerable case, further advice will be sought from a supervisor and or the Client if in doubt.

Working with Third Parties

On each Council contract and in every area of the country, Equita aim to liaise with local Citizens Advice Bureaus and Advice Agencies to form good three way relationships between us, our client and them.

Equita have also given over 20 presentations to local Citizens Advice Bureaus across the country over the past 24 months to give an insight into the industry and share any concerns within the local communities.

The feedback from these presentations has been encouraging, particularly in playing a part in developing a close working relationship between Equita, the Authority and any other third party. Follow up sessions have been held and joint workshops established.

Equita provide local CAB offices with clear lines of communication and offer:

- Direct dial telephone lines/e-mails to client team
- Include local CAB contact details in debt advice pack

All correspondence received for both the CAB and the Ombudsman is dealt with as a matter of urgency and copies are supplied to our clients. We ensure:

- Correspondence are dealt within 3 working days
- Copies of all correspondence are sent to the client within 24 hours
- All Enforcement Agents and Investigations Officers carry a Debt Advice Pack which they will pass onto the debtor if required. The Debt Advice Packs carry full contact details for CABs and advice agencies local to the area.

Enforcement Agents also carry cards with local CAB contact details on that they also pass onto the debtor if the Enforcement Agents deem it appropriate.

Other Organisations we liaise with

Equita also take advice from the following organisations with regard to our training course content and codes of practice:

- MIND (information and advisory charity for people with mental health problems)
- Ethnos (specialists in ethnic minority research)
- Scope (equal opportunities charity for disabled people)
- RNIB (Royal National Institute of Blind People)
- Sense (charity for deaf/blind people)
- MALG Awareness Guidelines 2015 (Money Advice Liaison Group)