

Debt Management and Recovery Policy for Adult Social Care Debt

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1 Introduction

1.1 Objectives and Scope

The purpose of this document is to set out consistent and effective processes for the collection, recovery and enforcement of Adult Social Care charges owed to RMBC.

Effective financial management is fundamental to being able to fund the quality of services the Council provides. The best method of debt collection is the prevention of debt arising and this policy covers both prevention and recovery.

Key principles of the Policy:

1. Collection of all money due; quickly, efficiently and economically taking into account the financial circumstances and mental capacity of the customer.
2. Prevention of debt and arrears; by prompt notification of charges, billing and collection of money due and affordable repayment plans and early intervention when a customer is in arrears.
3. Ensuring that principles protecting the rights of vulnerable customers underpin all actions and that where there are issues of financial mismanagement or exploitation, appropriate investigations are carried out under the Council's Safeguarding Policy.
4. Provision of a legal framework to enable legal enforcement (where necessary and appropriate) to recover debts.
5. Compliance with the Council's Financial Regulations and Standing Orders

1.2 Considerations

This document should read in conjunction with the Council's Financial Regulations and the Corporate Debt Policy. It is also supported by operational procedures for staff within the Revenue and Payments Service.

2 Legal and Policy Framework

This policy provides a framework to enable legal enforcement to be undertaken to recover debts where appropriate.

The method of recovery of money owed depends on whether the care services are provided in the community or in a residential care home. For care services which are provided in the community, the Fairer Charging Guidance is applied and for residential care, the Charging for Residential Accommodation Guide (CRAG) is used.

The main powers and duties for local authorities to charge for Social Care services are described in the following acts of legislation:

- Part 3 National Assistance Act 1948
- Section 17 of the Health and Social Services and Social Security Adjudications Act 1983 (HASSASSA)
- The National Assistance (Assessment of Resources) Regulations 1992

Powers to make reasonable charges for non residential services are included in the following acts of legislation:

- Welfare Services for Disabled Persons (section 29 of National Assistance Act 1948);
- Section 2 of the Chronically Sick and Disabled Persons Act; and
- Service for Older People (section 45 Health Services and Public Health Act 1968)

CRAG and the Fairer Charging Guidance provide statutory guidance to local authorities on how to interpret the regulations on charging for residential and non-residential care and support set out in the legislation.

Failure to pay cannot be the grounds for the termination of a service (Section 17 HASSASSA 1983); charges are recoverable as civil debt.

The draft Care Bill which was published on 11 July 2012 proposes to replace the above legal framework for adult care and support, which are deemed as outdated, with a single new law.

The Care Bill has completed all the parliamentary stages in the House of Lords but still has to complete all the stages in the House of Commons, and then receive royal assent before becoming an Act of Parliament (law).

3 Financial Assessment

As part of the Council's social care assessment to determine if there is a need for social care services to be provided, the Council will undertake a financial assessment. This financial assessment will determine how much the customer is required to contribute towards the cost of their social care services.

The Council will provide support through the assessment process and will need a full financial disclosure from the customer to undertake this assessment.

The financial assessment process for customers in residential care is conducted in accordance with CRAG.

The financial assessment process for customer using non residential care services is conducted using Fairer Charging Guidance.

3.1 Independent Sector Providers of Residential Care

Rotherham Metropolitan Borough Council is an in house provider of residential care. It also purchases residential and nursing care services from the independent sector. Under contractual arrangements, the council pays for the cost of the residential and nursing care services net of the customer's assessed charge and requires the Service Provider to collect the customer's assessed charge directly from the customer.

If there are arrears of a customer's charge, the service provider will commence the debt recovery process and are required to notify the Council within 6 weeks of the date of invoice.

Where the service provider meets their contractual requirement to undertake prescribed recovery steps and they prove unsuccessful, the Council will underwrite the debt to the service provider and commence the legal proceedings to recover the debt.

3.2 Residential Care Property Deferred Payment Scheme

For customers who are entering residential care (assessed in accordance with CRAG) their property will be considered as part of the financial assessment process. The treatment of property owned by the customer receiving care will depend on whether the customer is a legal or a beneficial owner. Where ownership is disputed, written evidence to prove ownership via the customer and Land Registry will be obtained and considered as part of this decision.

The Council will determine the value of the property at the time of the social care assessment. This will include asking the customer and making an assessment of the value of similar properties nearby. Where the value is disputed or there is doubt as to the value, the Council will arrange for a professional valuation to support the assessment.

In most circumstances, the Council will consider a Deferred Payment Scheme. Under this scheme the customer is not required to immediately sell the property they own or have a financial interest in. The Council will require a signed legal agreement that allows the Council to place a legal charge on the property and defer that part of their assessment relating to the value of their property until the property is sold. Once the agreement has been signed, a Charge will be placed on their property under Section 55 of Health and Social Care Act.

The Charge will show up in future land searches and providing that the outstanding care fees will be paid from the proceeds of the house sale; the Councils Solicitor will remove the Charge on the property.

3.3 Residential Care Third Party Top Ups

If a customer chooses a residential care provider that is more expensive than those rates set by the Council, then the customer's representative (third party) can pay the difference in the amounts. This is also known as Third Party Top Up Fee.

Customers are not permitted to pay their own Third Party Top Up. Instead their representative (third party) would enter into a legal agreement with the Council. This states that they are responsible to pay the top up fees and that any debts may be recovered from them through legal action. As part of this process, the Council will seek assurance that the third party has the means to make the payments and that they are fully aware of their responsibilities and the potential consequences of non-payment. The Council will not agree to any Third Party Top Up arrangement unless the legal agreement has been signed and agreed.

If there are arrears on a third party account, the Council will commence the legal debt recovery process. The Council may choose to terminate the agreement and reassess the accommodation with a view to moving the customer to a less expensive placement that where possible would be within the rates set by the Council.

Third Party agreements will be reviewed every year as part of the annual care review process.

4 Principles of Collection, Recovery and Enforcement

The intention of the Revenues and Payments Service is to maintain a “firm but fair” approach to the collection and recovery of Social Care Charges.

We will financially assess a customer in a timely manner to ensure customers are aware of how much they have to pay and when.

We will ensure that every individual undergoing a financial assessment under fairer charging is provided with written information on maximising entitlements to benefits.

We will issue prompt and accurate bills ensuring the correct calculated assessed charge is used.

We will make the payment of social care charges as easy and convenient as possible by prompting a wide range of payment methods including our preference of Direct Debit.

We will give our customers a variety of options to contact us to discuss payment of their accounts:

- By telephone to the dedicated Revenue and Payments lines
- By email, in writing or through web forms on our web site
- Face to face through at Riverside House

We will process changes to charges in a timely manner in order to ensure customer’s accounts are as up to date as possible.

We will inform customers who fall 28 days behind with their charges or payment arrangements, of the need to bring their payments up to date.

We will try to engage with the customer at every opportunity during the recovery process in order to discuss and make a suitable repayment arrangement and to avoid further recovery action. This includes clearly warning customers about further recovery actions that may happen and the additional costs and charges they may incur if they do not come to an earlier payment arrangement.

We will try to collect all debts owed where they are legally collectable, irrespective of age, in order that we can maximise revenue to the Authority to be fair to all those tax payers who have paid their liabilities.

We will review the appropriateness of each recovery option based on what we know about the customer’s circumstances, their ability to pay, their past payment history, their mental capacity or any other physical health or age related limitations and the requirement to recover outstanding monies in a timely and efficient manner.

We shall take special care in pursuing debts relating to particularly vulnerable customers. When pursuing debts relating to particularly vulnerable customers we shall seek to involve a responsible third party who can act for the customer in the customer’s best interests, and check the customer consents to the arrangements.

Where appropriate, we will direct the customer to sources of debt and benefits advice.

We will regularly review accounts which are in arrears to ensure that they are subject to ongoing recovery and enforcement action.

We have a complaints procedure to enable customers to challenge us where they believe we have not acted fairly or lawfully.

We regularly review our policies and procedures. This document is reviewed annually.

5 Invoicing and Payment Options

5.1 Non Residential Care

The Revenue and Payment Service is responsible for despatching invoices for non residential care throughout the year.

Invoices for weekly charges of £20.00 or more are issued on a 4 weekly basis; invoices for weekly charges of less than £20.00 per week are issued on a quarterly basis. All invoices should be issued within 4 weeks of the service period end date (this timescale is restricted by allowing for collection and administration of service provision data from independent sector providers).

All invoices are due for immediate payment upon issue.

Direct Debit is the most efficient and preferred method of payment for the Authority and is promoted at every opportunity. It also assists customers to avoid missing payments and being subject to recovery action. Direct Debits are collected every 4 weeks and are collected 12 days after the service period end date.

Other payment options include paying online, paying by telephone, paying by post, paying in person at one of the Customer Service Centres, or paying by swipecard at a Post Office.

5.2 In House Residential Care

The Revenue and Payments Service is responsible for despatching residential care invoices throughout the year.

Residential care invoices are issued on a 4 weekly basis and should be issued within 2 weeks of the service period end date.

All invoices are due for immediate payment upon issue.

Direct Debit is not currently offered for residential care due to the limitations of the existing IT solution but other payment options are available including paying over the telephone, paying by post, by standing order and paying in person/at a kiosk at one of the Customer Service Centres/district offices.

5.3 Independent Sector Residential Care

The authority requests independent sector providers of residential care to collect the charges on its behalf as part of the terms and conditions of the contract between the provider and the authority.

Providers are required to issue monthly invoices and to inform the authority should those charges remain unpaid 6 weeks following the date of the invoice.

The provider is also required to take reasonable steps to recover unpaid charges, including the issuing reminders

6 Recovery Action for Unpaid Invoices

The Revenue and Payment service has a timetable for recovery action which is set with the aim of ensuring that income is maximised to enable the Authority to provide services to the public of Rotherham.

If an invoice isn't paid within 28 days of issue, telephone contact with the customer may commence and continue for as long as considered appropriate, in addition a reminder letter will be sent. The reminder letter provides the customer with a further 28 days in which to bring the account up to date by paying the overdue balance.

If customer brings their payments up to date within 28 days following the issue of a reminder letter or no further action is taken.

If a payment arrangement is made providing that payment of the arrangement is maintained then no further recovery action is taken.

If the account remains unpaid 28 days after issue of the reminder letter, the second written communication is issued.

Arrangements may be made for a visiting officer to call to see the customer to agree a resolution to the arrears situation.

Should the account remain unpaid after a further 14 days the third written communication is issued.

Should the account remain unpaid after a further 14 days the Revenues and Payments service will liaise with the Council's Legal Department. The Legal Department will write to the customer explaining that legal proceedings are pending, the associated costs and the action that is required to avoid such proceedings.

6.1 Arrangement for Payment

When agreeing an arrangement for payment we will always ask that the customer pays an amount equal to their current weekly charge, plus an affordable amount in respect of any arrears. This ensures that the customer is able to maintain their payments and prevent the overall debt from increasing.

Where this is not possible due to a recent change, a temporary arrangement will be made with an appropriate date for its review.

When making the arrangement we will:

- Have proper consideration for a customer's circumstances.
- Where we feel an offer of payment is too low we will provide clear reasons why we are rejecting the offer and indicate an amount that we believe is reasonable.
- Where appropriate, allow time for benefits and debt advice through referral to advice agencies, or if the agency informs us that the customer is receiving advice from them.
- Accept that, in some exceptional circumstances, no payment scheme is affordable and a temporary deferral of payment can be agreed.
- Respect and protect customer's rights at every stage of the recovery process.
- Recognise where the customer has other priority debts (e.g. rent arrears or utility debts), or debts owed to other Council departments, and ensure that a fair balance is reached between claims.

- Make allowances for poorly organised customers.

We will always try to resolve debt problems at the earliest opportunity, without letting them get out of control by advising customers, or taking appropriate action, as soon as possible after an arrangement payment is missed.

6.2 Referral to Safeguarding Adults Team

In some arrears cases, concerns may arise that the individual acting as financial agent and responsible for paying the charges on behalf of the customer is not administering the finances appropriately, in cases such as this it will be appropriate to refer the case to Safeguarding Adults Team as potential financial abuse.

Each arrears case will be considered on an individual basis before a referral is made; only when it has been clearly established that the financial agent has the ability to pay, but is refusing to co-operate with all our attempts to enforce this will a referral be made.

An arrears visit will always be undertaken as part of this process to establish if there is a clear intention to avoid paying the charges and other factors such as whether any payments have been made, if the personal expenses allowance is being paid to the customer, and the level co-operation/communication from the Financial Agent will also influence the decision.

6.3 Welfare Benefit Appointeeship (Residential Care Only)

Where a customer is in residential care and an appointee is responsible for administering the welfare benefits on their behalf and using them to pay their accommodation charges, should they fail to undertake this duty, this will be reported back to the Pension Service/DWP with a request for benefits to be suspended whilst the appointeeship is reviewed to find a more suitable recipient.

The authority will take this action with the intention to limit the scale of the arrears and protect the customer's best interests.

6.4 Gift of an Asset under HASSASSA 1983

The Council will make full use of its enforcement powers under Section 21 of the Health and Social Services and Social Security Adjudication Act 1983. If a customer gifts an asset within six months before service commenced, with the intention of avoiding charges for accommodation, the recipient of the gift becomes liable for the social care charges

6.5 Charge on a Property under HASSASSA 1983 (Residential Care Only)

Where a customer is admitted to permanent residential care, and they fail to pay their assessed charge and the customer has a beneficial interest in a property, Section 22 of the Health and Social Services and Social Security Adjudication Act 1983 gives the Council the power to place a charge on the property to secure the debt.

The debt then has to be discharged upon sale of the property, subject to the sale value and any higher legal charges present.

The Council will make full use of these enforcement powers where available to secure the repayment of the debt.

Under exceptional circumstances, the authority may consider taking possession of the property and forcing its sale to discharge the debt. Any decision to force sale of a property has to be approved by the Director of Health and Wellbeing.

6.6 Absconders

Sometimes a customer may leave the area or residential care with debt still owing and without providing a forwarding address. These are sometimes referred to as 'Gone Away' or 'absconders'.

We may be able to trace the customer through our internal systems. If we are unable to locate the customer using in-house information, we will use a data credit company or collection agent services.

7 Legal Proceedings through the County Court

7.1 Decision to Commence Legal Proceedings

A County Court Judgement gives the Authority the various powers of recovery,

The Authority will choose the appropriate recovery option based on what we know about the customer's circumstances, their ability to pay, their past payment history, their capacity to litigate, any physical health or age related limitations and the requirement to recover outstanding monies in a timely and efficient manner.

The decision to commence legal proceedings for recovery of an unpaid debt will be approved by the Director of Health and Well Being. Where approval is declined, the debt will be submitted for write off.

7.2 Mental Capacity Act 2005

Where a decision is made to commence legal proceedings, consideration should be given to whether the customer has mental capacity for litigation purposes. The Mental Capacity Act provides a framework for assessing a persons' mental capacity and determining their best interests if they lack capacity to make a decision.

Where a customer lacks mental capacity to conduct or defend the litigation on their own behalf then an application should be made to the court to appoint a litigation friend.

It is the duty of a litigation friend fairly and competently to conduct proceedings on behalf of a protected party. The litigation friend must have no interest in the proceedings adverse to that of the protected party and all steps and decisions the litigation friend takes in the proceedings must be taken for the benefit of the protected party

7.3 Issue of County Court Claim

The court will issue a claim form with details of the claim to the customer who has a set period of time to respond; this is their opportunity to explain the situation to the court.

The customer can accept that they owe the debt and they will receive an admission form with the claim form, asking about their income and outgoings. On the form they can make an offer to repay the debt in instalments.

The customer can dispute that they owe the debt and can complete a defence.

If the customer does not respond or if the court agrees that the customer owes the debt then the court will issue an order to pay the debt.

Once a county court judgement has been obtained a notice will be sent to the customer, where no payment arrangement has been agreed, together with an income details form requesting they supply details of their income and expenditure. The notice also contains details of what action may be taken if payment, or an arrangement for payment, is not made.

If the customer doesn't make an offer on the form, or if they make an offer that both we and court do not agree with, or if they do not make the offer in the required timescale, then the court may order the customer to either:

- pay the full amount in one lump sum
- pay the debt back in set monthly payments

Records of judgments are kept for 6 years unless the customer pays the full amount within a month.

7.4 Enforcement Options

Once a county court judgement has been issued, there are various options open to us to enforce repayment:

Approval will be sought from the Director of Health and Wellbeing prior to any enforcement action commencing.

7.4.1 Warrant of Execution leading to Bailiff Action

We can ask the court to use bailiffs to collect the money.

The bailiff will ask for payment within 7 days.

If the debt isn't paid, the bailiff will visit the customer's home or business, to see if anything could be sold to pay the debt.

7.4.2 Attachments of Earnings

We can ask the court for an attachment of earnings order which is a method by which money will be stopped from a customer's wages to pay a debt.

An attachment of Earnings will only help if the defendant is in paid employment, due to this it will not always be an appropriate method for enforcing recovery action for debts for Adult Social Care.

7.4.3 Bankruptcy

We can petition to the court for a bankruptcy order, in order that the customer's assets can be used to pay their debts.

Bankruptcy may only be an appropriate method for enforcing recovery action for Adult Social Care in exceptional circumstances.

7.4.4 Third Party Debt Order to Freeze Assets/Bank Accounts

We can ask the court to freeze money in the customer's bank or building society account (or in a business account).

The court will decide if money from the account can be used to pay the debt.

7.4.5 Charging Order on a customer's Land or Property

We can ask the court to charge the customer's land or property.

If the land or property is sold, they must pay this charge before they get their money.

8 Write Off

We have an agreed procedure for writing off social care charges, provided the relevant criteria are met.

We will only consider writing off debts where they are deemed to be uncollectable, e.g. in circumstances where we are unable to trace the customer, where they have passed away (although we will normally look to collect any outstanding amounts from the deceased's estate), if it is considered uneconomical to pursue the debt further or where the Director of Health and Well Being has decided that legal action is not appropriate.

The age of the debt is not usually a reason itself to consider write off.

9 Assistance to Customers

We recognise that some people do not pay their social care charges because of genuine financial or other difficulties. Although we take a 'firm but fair' approach to recovery and enforcement, it is our policy also to offer help and support to all customers who are experiencing difficulties paying at every stage of the collection and recovery process.

Although we have a duty to collect all social care charges we also recognise that some customers will have financial and other difficulties that are not limited to paying social care charges. Wherever possible, therefore, we will try to achieve a long term solution, rather than just recovering money that is owed now, so that the customer is better able to manage their finances in the future, and meet their future liabilities.

We recognise that some customers experience genuine hardship because of financial problems. It is our intention, wherever possible, not to add to that hardship through collection and recovery (recognising that customers do have to pay what they are liable for), but to provide the customer with help and support to resolve their finances.

We will particularly try to help and support customers in the following key ways:

- We will offer a range of payment dates and payment methods to enable customers to be able to easier maintain payments.
- We will always try to resolve debt problems at the earliest opportunity, without letting them get out of control, by advising customers as soon as possible that charges are overdue.
- We will sign post customers towards relevant assistance, including advice agencies.
- When agreeing an arrangement for payment we will always ask that the customer pays an amount equal to their current weekly charge, plus an affordable amount in respect of any arrears. This ensures that the customer is able to maintain their payments and prevent the overall debt from increasing. Where this is not possible due to a recent change, a temporary arrangement will be made with an appropriate date for its review.
- We will provide time for benefits and debt advice through referral to advice agencies, or if the agency informs us that the customer is receiving advice from them.
- We will have proper consideration for a customer's circumstances and financial situation, including other priority debts, when taking recovery action and making arrangements for payment.
- Where we feel an offer of payment is too low we will provide clear reasons why we are rejecting the offer and indicate an amount that we believe is reasonable.
- We will respect and protect customer's rights at every stage of the recovery process.
- We accept that in some exceptional circumstances, no payment scheme is affordable.
- We will advise customers of their possible entitlement to any benefits, discounts or exemptions.
- We also work as co-operatively as possible with advice agencies. For example, wherever possible and appropriate, at the request of an advice agency we will agree to put a hold on any recovery action for an agreed period to enable the customer to receive specialist advice which will help them make a sustainable payment arrangement with us.

10 Glossary of Terms

Abbreviation	Explanation
CRAG	Charging for Residential Accommodation Guide
HASSASSA	Health and Social Services and Social Security Adjudication Act 1983
DWP	Department for Work and Pensions
RMBC	Rotherham Metropolitan Borough Council

11 Reference Documents

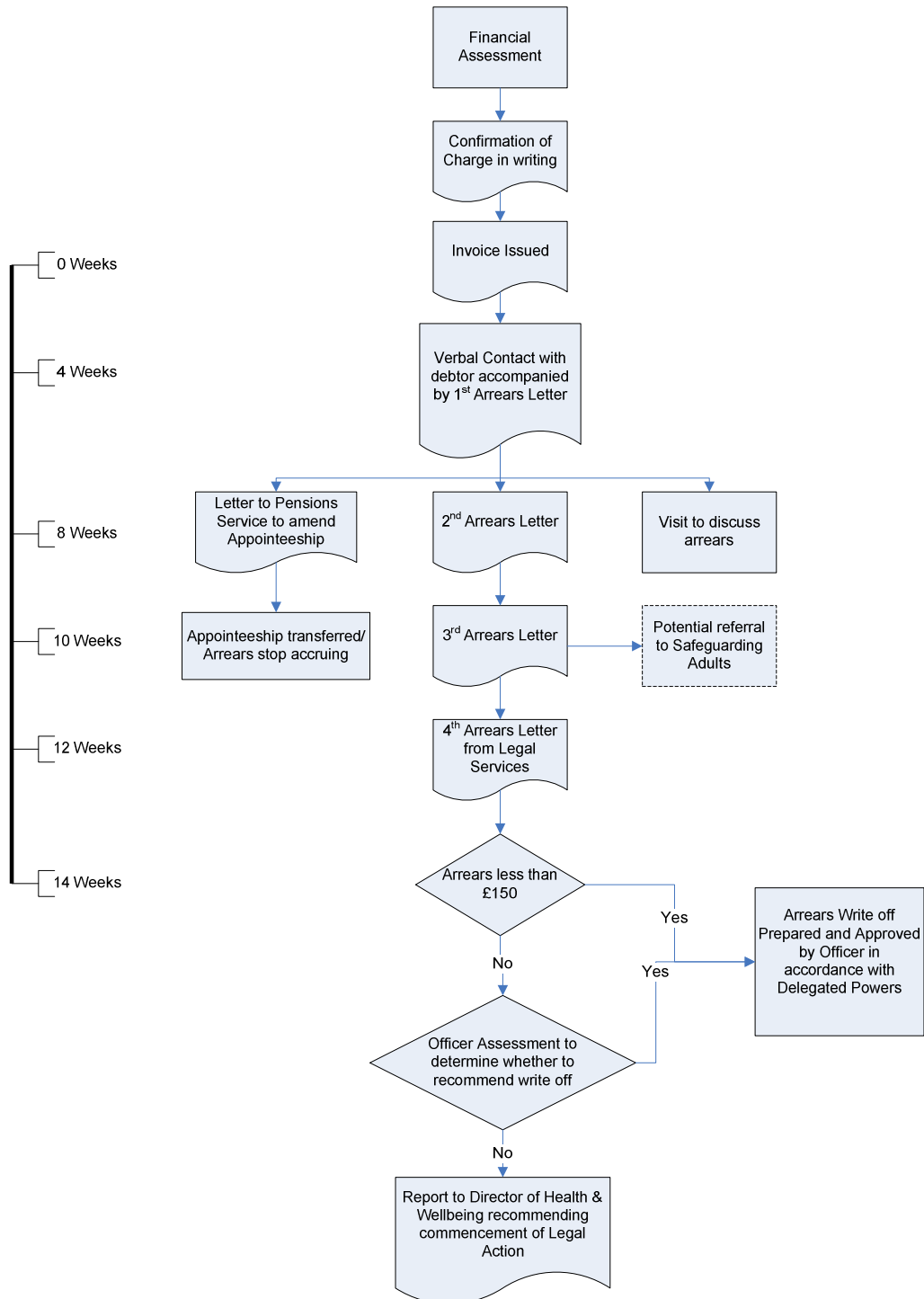
Ref. No.	Document Title	Document Ref.
1	RMBC – Financial Regulations	http://intranet.rotherhamconnect.com/C9/C13/Key%20
2	RMBC – Corporate Debt Policy	Financial information downloads - Rotherham Metropolitan Borough Council
3	OFT – Guidance for Businesses Engaged in the Recovery of Consumer Credit Debts.	http://www.ofc.gov.uk/about-the-ofc/legal-powers/legal/cca/debt-collection

12 Change History

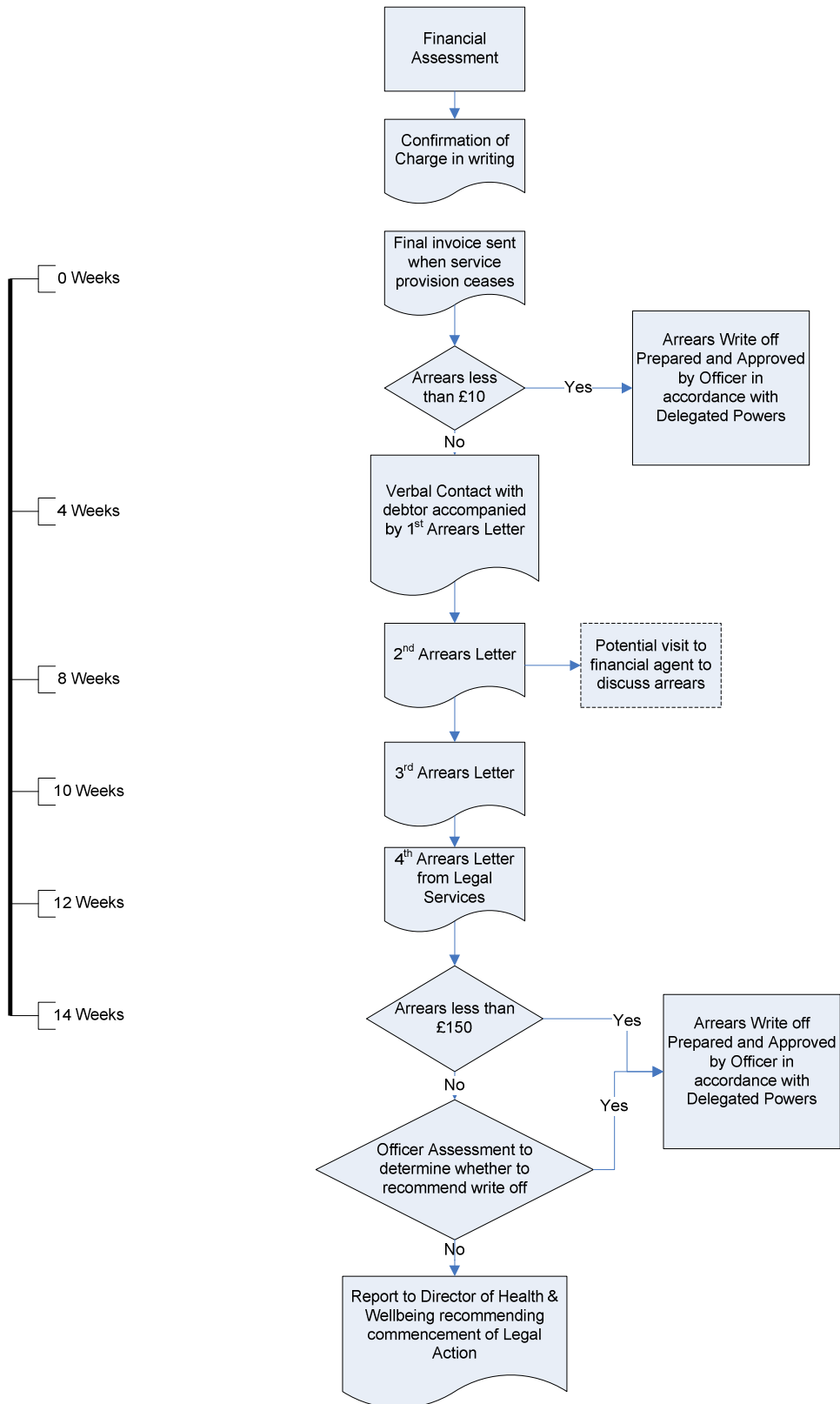
Issue	Owner	Date	Change Details
1, 1 st Draft	Gillian Buckley	05/08/13	Initial Draft
1, 2 nd Draft	Gillian Buckley	03/09/13	Updated with amendments identified by; <ul style="list-style-type: none"> • R Cutts Service and Development Manager
1, 3 rd Draft	Gillian Buckley	20/11/13	Updated with amendments identified by: <ul style="list-style-type: none"> • S McFarlane Director of Health and Wellbeing, Neighbourhoods and Adult Services • A Phillips Team Manager – Litigation, Legal Services
1 4 th Draft	Gillian Buckley	29/11/13	Updated with amendments identified by; <ul style="list-style-type: none"> • A Bucknell Senior Financial Assessment Officer • A Phillips Team Manager – Litigation, Legal Services
1, 5 th Draft	Gillian Buckley	10/12/13	Updated with amendments to Safeguarding referrals identified by; <ul style="list-style-type: none"> • S Newton Safeguarding Service Manager
1, 6 th Draft	Gillian Buckley	15/01/2014	Updated with flowcharts as appendices and addition of restriction on timescales in section 5.1.

13 Appendices

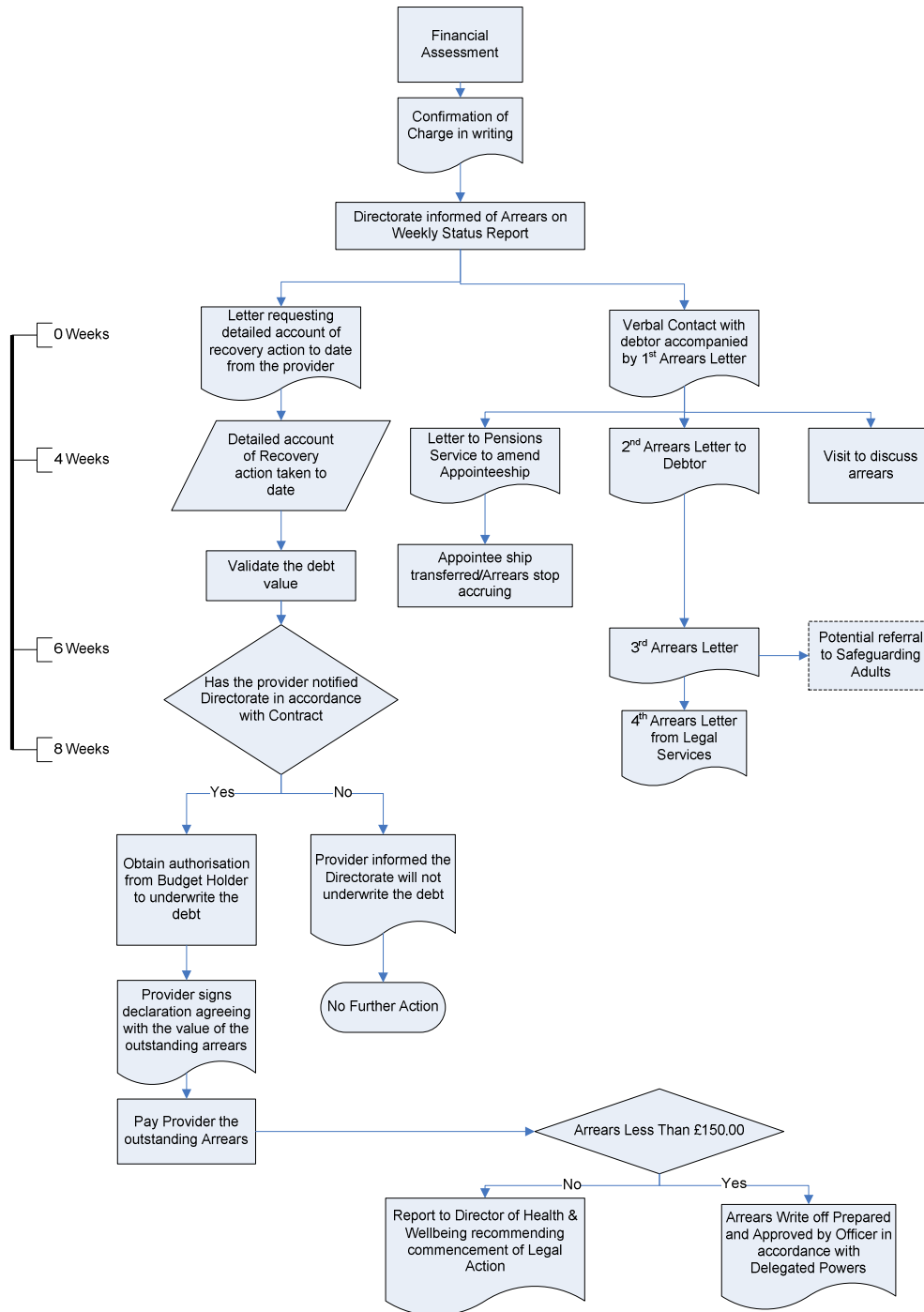
13.1 Appendix A: Residential Recovery Route – Council Managed Debt – Open Cases



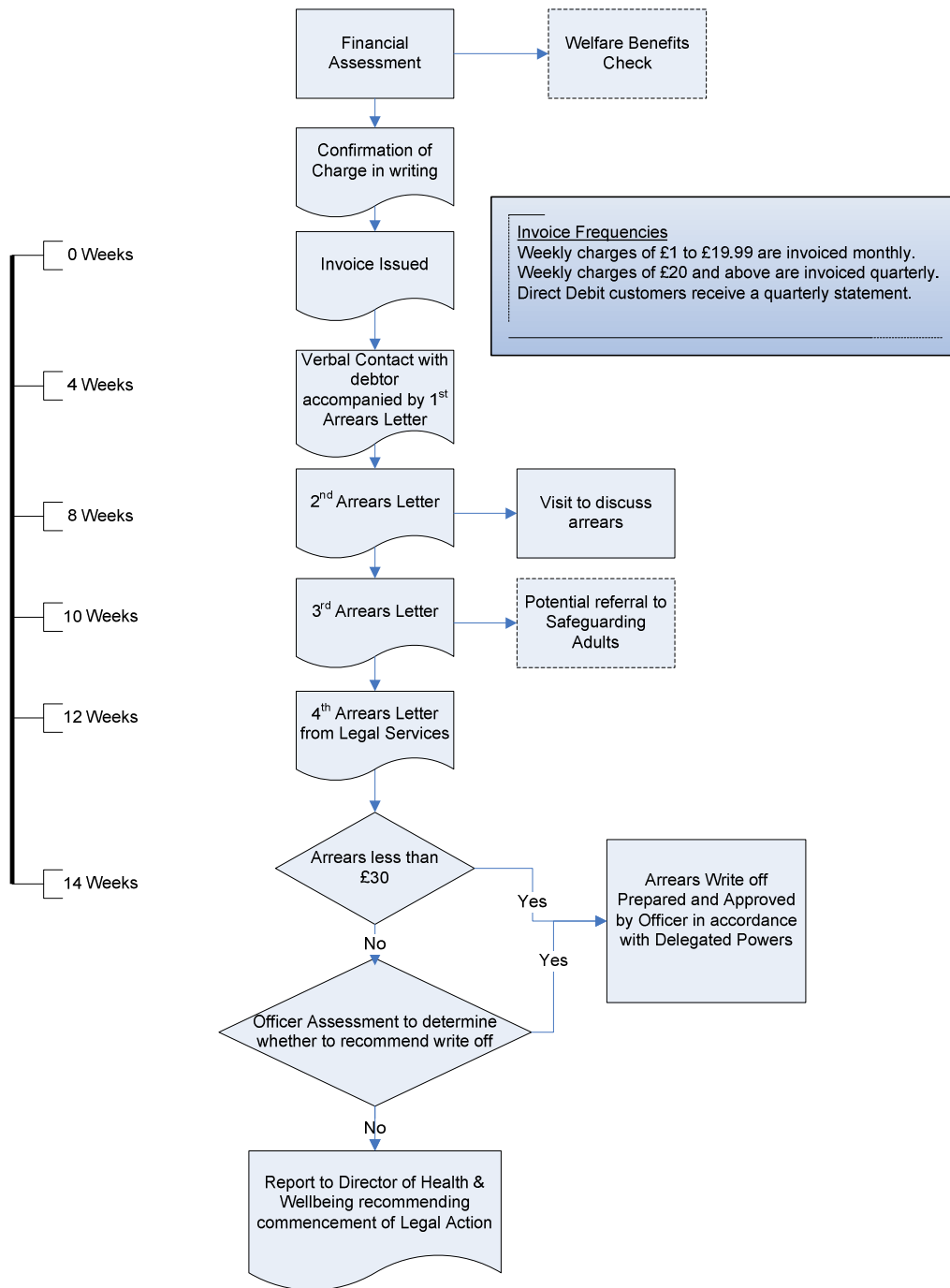
13.2 Appendix B: Residential Recovery Route – Council Managed Debt – Closed Cases



13.3 Appendix C: Residential and Nursing Recovery Route – Debt Managed by Independent Sector



13.4 Appendix D: Non Residential Recovery Route – Open Cases



13.5 Appendix E: Non Residential Recovery Route – Closed Cases

