

Thank you for inviting us to speak at this scrutiny meeting. My name is Rhi Hughes and I'm speaking as a Community Engagement Manager of South West London Law Centres. I'm based in Croydon, Davis House. As a law centre we provide free legal advice in debt, housing, welfare benefits, immigration, employment, and pro bono advice. We are constantly pushing full capacity and are dedicated to supporting residents through crisis and push against the systems that contribute to this crisis which is why it's important for us to speak today.

Last month we heard harrowing testimonies of how people with council tax arrears had their debts recalled. These experiences spanned over many years to the present day and suggest this is an issue with the enforcement strategy the council uses not individual enforcement officers.

We believe some of the strategy could be improved by:

- **Transparency of council tax policies, including who is considered a vulnerable resident.**
- **Offer people advice and support options before escalating debt and make checks before pursuing the debt.**
- **Prevent residents from being overwhelmed into making payment plans they can't afford, by first making them aware of money advice services that can help them prepare payment plans such as ours.**
- **Signpost when needed to additional financial support schemes available within the council.**
- **Regarding hardship payment- If residents are not successfully rewarded a hardship payment, they are told they are able to appeal. It would be beneficial if a reason was given on why the application was unsuccessful, so residents know what to appeal.**
- **Monitor and ensure that no bailiff action is being used for those who were previously in receipt of Council Tax Support as promised by Croydon Council.**
- **As there is no longer an inhouse welfare rights or pioneering gateway team we do urge Croydon Council to fund essential frontline legal advice services in Croydon and arrange direct referrals to these services. This would ensure that residents get face to face advice and support to reduce or pay debts. Referrals to bailiff action can increase debts between £75 and £300, for anyone financially pushed this amount would be crippling.**

Documents provided to this committee by Croydon Enforcement Agencies state they have a policy for dealing with vulnerable residents. To feed into our call for transparency, please would these agreed procedures be shared along with a definition of what is considered a 'vulnerable' resident. This will help us and vulnerable residents ensure they are protected when it comes to enforcement action.

In December 2021 Croydon Council held a consultation into the removal of its Council Tax Support Scheme for a range of people on low income. The law centre along with other poverty fighting charities strongly objected to the removal of Council Tax Support for some of the Croydon's most vulnerable residents. The changes were agreed by cabinet with the recommendation of a review of the new scheme and hardship payment to be carried out in August 2022. We would be keen to see this review and understand the impact that the changes to the council tax support scheme are having.