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Harrow Monitoring Group - email

Technical Consultation – Improving Enforcement of Council Tax

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Introduction

Harrow Monitoring Group welcomes the opportunity to respond to the Ministry of Housing, Communities and Local Government's technical consultation on improving the enforcement of council tax.

As an independent community organisation supporting residents, particularly those in vulnerable circumstances and experiencing financial hardship, we regularly see the impact that council tax practices can have on individuals and families. Through our work, we support residents to engage with the Council and access Council Tax Support and other benefits.

We support the Government's objective of creating a fairer, more proportionate and consistent approach to council tax enforcement that distinguishes between those who are unable to pay and those who deliberately avoid payment. We welcome the emphasis on earlier engagement, improved communication and greater consistency in recovery arrangements, which we believe will help reduce avoidable hardship while supporting sustainable collection of council tax.

As Harrow Monitoring Group is a community organisation rather than a billing authority, we are not able to provide operational data or comment on the internal administration of Harrow Council's council tax service. Where consultation questions seek information that only billing authorities can provide, we have indicated this. Our responses draw on our experience of supporting Harrow residents affected by council tax arrears and enforcement, together with our understanding of the challenges faced by vulnerable communities across the borough.

The following responses address each consultation question in turn from the perspective of a community organisation working directly with residents affected by council tax arrears and enforcement.

Question 1

Harrow Monitoring Group is not the billing authority and therefore cannot provide operational data on the number of reminder notices, final notices or liability orders issued by Harrow Council. We encourage the Government to consider this information alongside qualitative evidence from community organisations that work directly with residents affected by council tax enforcement.

Question 2

We support proposals requiring councils to take meaningful pre-enforcement steps before commencing formal recovery action. Our experience shows that many residents who fall into council tax arrears are not unwilling to pay but are experiencing temporary financial hardship, illness, insecure employment, caring responsibilities, domestic abuse or administrative difficulties. Mandatory early engagement is likely to prevent avoidable escalation of debt while improving collection rates over the longer term.

Question 3

Reminder notices should clearly explain the reason for the notice, the amount outstanding, the actions available to the resident, the availability of Council Tax Support and other financial assistance, how to seek independent debt advice, and the consequences of failing to engage. Information should be written in plain English and made available in accessible formats and community languages where appropriate.

Question 4

We strongly support a requirement for councils to make genuine attempts to contact residents before commencing enforcement action. Communication should not rely solely on standard letters. Telephone contact, email, text messaging and face-to-face engagement should be used where appropriate, particularly where vulnerability is suspected.

Question 5

Repayment arrangements should always be based upon affordability rather than standard instalment arrangements. Residents should be given reasonable opportunities to discuss their circumstances before enforcement costs are added. Flexible repayment plans increase the likelihood of successful recovery while reducing financial hardship.

Question 6

Councils should proactively identify residents who may be entitled to Council Tax Support or other financial assistance before enforcement action progresses. Many residents supported by Harrow Monitoring Group are unaware of their entitlement or have experienced difficulties navigating the application process.

Question 7

As Harrow Monitoring Group is not responsible for administering council tax, we cannot comment on the operational challenges facing billing authorities. However, we recognise that implementing additional pre-enforcement requirements will require appropriate funding, staff training and updated administrative systems. These reforms should be properly resourced if they are to achieve their intended objectives.

Question 8

We strongly support statutory guidance promoting consistent standards across all billing authorities. Residents should receive the same minimum standards of fairness regardless of where they live. Guidance should promote proportionality, early intervention, affordability assessments, effective communication and appropriate use of discretion.

Question 9

We are not in a position to comment on Harrow Council's internal recovery procedures. However, our experience of supporting residents indicates that many people seek advice only after recovery action has already escalated. Earlier engagement with independent advice organisations would improve outcomes for both residents and councils.

Question 10

The statutory guidance should also encourage partnership working between councils and trusted voluntary and community organisations. In Harrow, community organisations frequently help residents understand council correspondence, complete benefit applications, negotiate affordable repayment arrangements and restore communication between residents and the council. Earlier referral pathways could prevent many cases progressing unnecessarily to enforcement.

Question 11

One of the greatest challenges is identifying vulnerability at an early stage. Residents may not disclose mental ill health, disability, domestic abuse, language barriers or financial hardship until enforcement action has already commenced. Staff training should therefore include recognising indicators of vulnerability and responding appropriately.

Question 12

As a community organisation we cannot comment on the operational data currently available to billing authorities. We encourage Government to support lawful data sharing, where appropriate, to help identify residents who may be entitled to financial support while maintaining appropriate safeguards for privacy and data protection.

Question 13

The distinction between those who cannot pay and those who deliberately choose not to pay is fundamental. Affordability assessments, evidence of engagement, household circumstances and previous payment history should all be considered before more serious enforcement measures are used. Residents demonstrating willingness to engage should receive support rather than immediate escalation.

Question 14

Additional enforcement powers should be used only where there is clear evidence of deliberate and persistent non-compliance after reasonable opportunities to engage have been exhausted. Stronger enforcement should not inadvertently affect residents experiencing genuine hardship.

Question 15

We believe the proposals are likely to improve overall collection in the medium and longer term because earlier engagement reduces escalation, increases trust and enables affordable repayment arrangements. Residents are more likely to maintain repayments where they feel they have been treated fairly and respectfully.

Question 16

While Harrow is often perceived as a relatively affluent outer London borough, this masks significant inequalities between neighbourhoods. Harrow Council's own deprivation analysis identifies pockets of income deprivation, health inequalities and barriers to housing and services. Approximately 96,000 households are liable for council tax, with around 8,200 working-age households receiving Council Tax Support. These figures demonstrate that a significant number of residents remain financially vulnerable and may experience difficulty meeting council tax liabilities following relatively small changes in household income. Our experience of working with Harrow residents suggests that council tax arrears are more commonly associated with financial shocks and changing personal circumstances than with deliberate avoidance.

Harrow Monitoring Group regularly supports residents with council tax issues, but we are often approached only after reminder notices have escalated to liability orders or enforcement action. By that stage, relatively modest arrears have frequently become significantly more difficult to resolve because of additional costs and the stress associated with enforcement. Earlier intervention, clearer communication, affordable repayment arrangements and timely referral to independent advice services would improve outcomes for both residents and the Council.

Earlier engagement is particularly important in boroughs such as Harrow, where our experience suggests that opportunities for meaningful engagement with residents on welfare-related issues could be strengthened. Working more closely with trusted community organisations would help ensure that residents receive timely information, appropriate support and opportunities to resolve council tax difficulties before enforcement action becomes necessary.

Question 17

We believe these proposals have the potential to reduce inequalities if implemented effectively. In our experience, residents most likely to require additional support with council tax include people on low incomes, older people, disabled people, people with long-term health conditions, carers, people experiencing poor mental health, migrants and refugees, people with limited English proficiency, and others facing multiple forms of disadvantage. Measures requiring earlier engagement, accessible communication, affordability assessments and better identification of vulnerability should therefore have positive equality impacts.

The Government should monitor implementation through equality impact assessments, engagement with voluntary and community organisations, and feedback from people with lived experience of council tax arrears to ensure that the reforms achieve their intended outcomes without creating unintended barriers for vulnerable residents.

Conclusion

Overall, Harrow Monitoring Group supports the direction of the proposed reforms. We believe a council tax enforcement framework based on proportionality, early intervention, accessibility and partnership working will improve outcomes for residents while supporting sustainable council tax collection. We also emphasise the important role that community organisations can play in helping residents engage constructively with councils, access available support and resolve council tax arrears before they escalate into formal enforcement.

We appreciate the opportunity to contribute to this consultation and would welcome continued engagement with the Ministry as these proposals are developed and implemented.

References

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