

Birmingham City Council

Report to Cabinet

12 December 2023



Subject: Effective commissioning of debt collection

Report of: Graeme Betts, Strategic Director - Adult Social Care

Relevant Cabinet Member: Councillor Brigid Jones, Cabinet Member Finance

Relevant O &S Chair(s): Councillor Jack Deakin (Finance & Resources)
Councillor Lee Marsham (Sustainability & Transport)

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| Are specific wards affected? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No – All wards affected |
| If yes, name(s) of ward(s): | | |
| Is this a key decision? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| If relevant, add Forward Plan Reference: 010948/2023 | | |
| Is the decision eligible for call-in? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Does the report contain confidential or exempt information? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| If relevant, state which appendix is exempt, and provide exempt information paragraph number or reason if confidential: Exempt information paragraph 3: Information relating to the financial or business affairs of any particular person (including the Council) | | |

1 Executive Summary

- 1.1 The Council deals with many different types of debt. The way debt is dealt with varies depending on the legislative powers in place. For the purposes of this report, the type of debt is that which sits under the Taking Control of Goods (Fees) Regulations 2014 (TCOG). The debts which fall under this legislation are: Council Tax; Business Rates; Business Improvement District; Parking and Clean Air Zone. Legislation provides for these debts to ultimately be referred to Enforcement Agents (previously known as Bailiffs).

- 1.2 This paper provides an analysis of the current Enforcement Agent arrangements used by Birmingham City Council (BCC). It also provides Members with a proposal to consider the benefits of bringing some of the arrangements 'in-house' in order to increase income and outlines potential further opportunities in the future.
- 1.3 The hybrid 'in-house' proposal will:
- 1.3.1 enable the Council to identify financial (or other) vulnerability and utilise the knowledge to assist citizens;
 - 1.3.2 link to the Council's approach to 'early intervention and prevention';
 - 1.3.3 ensure the associated income in fees helps the Council to improve services for the citizens of Birmingham; and
 - 1.3.4 continue to work with external providers to ensure that debt collection is maximised to the Council.
- 1.4 As part of the Council's work to identify savings for the 2024-25 budget year and Medium Term Financial Plan (MTFP), a proposal to look at enforcement arrangements (with a view to generate additional income of £360k) in 2023-24 has been put forward as part of the new savings round.
- 1.5 Furthermore, this paper seeks approval of a new contract using the Crown Commercial Services (RM6226) Debt Resolution Services framework (see Appendix B – Exempt information) for a period of up to 12 months as an interim measure to enable services to be carried out for Council Tax, Business Rates and Business Improvement District debt recovery, prior to those services coming in house. The fees charged by all enforcement agencies are statutory in accordance with the TCOG, with these being a fixed fee structure. Enforcement Agent charges will be recovered directly from the debtor and therefore there is no direct cost to the Council.
- 1.6 This paper also seeks approval that following this cabinet report to bring inhouse Enforcement agency services for Council Tax, Business Rates and Bid Levies, to run procurement processes for the other remaining debt/enforcement services (see Appendix B – Exempt information) as and when needed by way of compliant mechanisms in line with Procurement Regulations. This will ensure contract coverage is in place for the remaining services during a period of stabilisation and incremental growth.

2 Recommendations

- 2.1 It is recommended that Cabinet approves the full business case in Appendix A to establish an 'in-house' Enforcement Agent (EA) operation, initially for council tax and business rates debts for the Compliance Stage (first stage), of the formal debt recovery process.

- 2.2 It is recommended that Cabinet notes that the Invest to Deliver group and associated delegated approval process agreed a sum of £247,171 to be allocated from the Delivery Plan Reserve to set up the operation.
- 2.3 It is recommended that Cabinet approves the phased transfer of other enforcement/debt collection activity (following an internal transformation project that commenced in 2022 on reviewing all these services) - subject to the appropriate due diligence following the initial first phase of in-house operation and a further Cabinet report.
- 2.4 It is recommended that Cabinet approves the consolidation of contract management of all enforcement agent activity across the Council (where possible and practical) and ensure value for money is maximised into the new enforcement operation.
- 2.5 It is recommended that Cabinet approves the requirement to use the Crown Commercial Services (RM6226) Debt Resolution Services framework for a period of up to 12 months commencing from the date this Cabinet report is approved, as an interim measure for Council Tax, Business Rates and Business Improvement District debt recovery, as set out in(Appendix B -Exempt Information).
- 2.6 Notes that a report updating Cabinet on the realisation of benefits associated with the setup of this new service after the first full year of operation.
- 2.7 That Cabinet delegates authority to the Director of Digital and Customer Services (or their delegate), in consultation with Assistant Director Corporate Procurement (or their delegate), the City Solicitor (or their delegate), and the interim Finance Director (or their delegate) to approve any new, compliant procurement processes and arrangements required (see Appendix B – Exempt Information).
- 2.8 That Cabinet delegates authority to the Director of Digital and Customer Services (or their delegate), in conjunction with the Assistant Director Corporate Procurement or their delegate, the Chief Finance Officer or their delegate, and the City Solicitor or their delegate to approve the selection of successful bidder(s) where compliant procurements are undertaken (see Appendix B – Exempt Information) including the execution of the necessary contractual documentation to give effect to these outcomes.

3 Background

- 3.1 Enforcement Agents (EA) operate under TCOG which sets out in law their responsibilities, powers and fee structure. Currently BCC uses one external firm of enforcement agents for all its council tax, business rates and BID levy revenue recovery. There are presently four enforcement agent organisations which BCC contract with – one in Revenues and three are used for the collection of Penalty

Charge Notices (PCNs). The Council has many other sources of debt but these are not covered by the same legislative powers. In general terms, the two strands of enforcement agent activity (Revenues and PCNs) can be summarised as:

- **Council tax, business rates and BID levy revenue:** The Council has a duty to citizens to collect as much council tax, BID levy, and business rates as possible. Part 1, chapter 1, section 1(1) of the Local Government Finance Act 1992 states that “each billing authority shall, in accordance with this Part, levy and collect a tax, to be called council tax, which shall be payable in respect of dwellings situated in its area.” It also has a duty to ensure that in doing so it is fair and reasonable. It is preferable for the Council to work with citizens and businesses to collect debts but as a last resort there is a need to enforce recovery of arrears through the use of enforcement agents, formerly known as bailiffs.
- **Penalty Charge Notices:** The Council follows a statutory process to pursue payment of outstanding PCNs for parking, bus lane and clean air zone contraventions (Road Traffic debt). The final stages can result in cases being passed to enforcement agents for them to recover the amounts due. It should be noted this means the Council pursues payment from motorists throughout the country not just Birmingham citizens.

3.2 Early Intervention and prevention

3.2.1 Consolidating enforcement agent arrangements across the council can help to contribute to wider council goals. If the council has an active role in EA activity it can directly support the corporate priority for early intervention and prevention through (i) identifying underlying debt issues and (ii) preventing different departments ‘chasing the pound’.

3.2.2 **Identifying underlying debt issues:** Combining EA activity into one place will support existing work to utilise council data to have an improved view of citizens personal debt. Existing arrangements mean that all ‘intelligence’ on individual circumstances is (in the main) retained by the external EA – having a broad view of personal financial circumstances will help the council offer appropriate support, enabling underlying debt issues to be dealt with at the earliest possible stage. It will also enable support and signposting to be put in place. This will become even more important as the cost of living crisis deepens.

3.2.3 **Preventing different departments ‘chasing the pound’:** As part of this proposal an external provider will be used to supply enhanced data on our customers, in order to segment the debt prior to it going to enforcement. This will enable unsuitable cases to be identified as early as possible, preventing additional unnecessary fees for those customers as well as reducing BCC resource on uncollectable debt. Costs for this are factored into this proposal. Reducing wasted effort in chasing collection of irredeemable debt is beneficial, particularly to avoid chasing whilst other parts of the council are

proactively supporting customers to mitigate their debt position – key to a successful early intervention and prevention approach.

3.3 What are the fees?

3.3.1 Under the TCOG regulations, as part of the debt collection process, enforcement agents charge fees at three stages for debts collected – they are the:

- compliance fee (£75)
- enforcement fee (£235 + 7.5% of the debt balance over £1,500); and
- sale fee (£110 + 7.5% of the debt balance over £1,500).

3.3.2 The compliance fee is the initial fee charged at the point an enforcement agent is instructed to collect the debt. It covers the first stage of the recovery process including tracing, letters, text messages and written correspondence. It is paid ahead of any debt collected. The second stage is the enforcement fee, this is charged once an agent is required to visit a property to establish contact, set up an arrangement or seize goods. The enforcement fee is paid on a pro-rata basis together with the actual debt. The sale or disposal stage fee is paid once seized goods are sold and is again paid on a pro-rata basis together with the actual debt. All fees are paid by the customer or business during the debt repayment process. All of the fee income is currently retained by the EA. This is a lost opportunity which could benefit BCC if the Council provided the service in house. The first phase of this proposal will be to bring 'in house' the Compliance Stage of collection of council tax, business rates and BIDs income.

3.4 Current enforcement agent work at BCC

3.4.1 Council Tax and Business Rates

3.4.2 The incumbent primary EA provider is the sole contractor to provide EA collection services until July 2023. Following approval of the recommendations in this paper the Council will need to continue with the existing arrangements for a period of 12 months as an interim measure, after which a procurement exercise will need to take place for a resilience EA contract.

3.4.3 For collection, performance and business continuity reasons, the Revenues Service has recently awarded a contract to Qualco via a Crown Commercial Services framework to provide coverage for recycled debt. Recycled debt is debt that has been unsuccessfully collected by the primary EA provider and returned to the council for collection.

3.4.4 Under the arrangement with Equita, the Council has received £38.9m in recovered debt over the previous four years. The exact amount of fees received by Equita is commercially confidential. The Council has analysed its data and

assessed the potential fee income. It has concluded that the income received for undertaking the Compliance Stage of enforcement would cover its costs and generate additional income.

3.4.5 This is based on 112,000 cases being referred with 70,000 (63%) returned where enforcement action was not possible. The main reasons for return being unable to locate or trace the individual or business or insufficient assets to allow for repayment in full or any payment at all. The Council already has arrangements in place to 'recycle' such cases to other enforcement agents – and this would continue should the 'in-house' proposal be accepted.

3.4.6 **Penalty Charge Notices**

3.4.7 Road traffic debt, in respect of the collection of outstanding PCNs, varies in a number of ways to council tax and business rates. There are many more out-of-area debts due to those not residing in Birmingham receiving PCNs. The process follows the same three stages.

3.4.8 EA contracts are often subject to procurement challenges. This is a national issue in a very competitive market. The enforcement of Road Traffic debt is currently out of contract due to complications of the previous procurement process, where legal challenges were received regarding the outcome of the contract award process. Since this time the council has continued to use the four companies that were last awarded the contract in 2013 when the tender process was followed. The Council has also worked to adapt working practices to reflect the changes in legislation that came into force after the award of the contract.

3.4.9 The Council follows a statutory process to recover payment of outstanding PCNs. This requires formal documents to be served by post to the registered keeper of the vehicle that fully explain the requirement to pay/appeal. In cases where all documents have been served and the full process has been followed (but payment remains outstanding), arrangements are made with the Traffic Enforcement Centre to register the outstanding sum as a debt.

3.4.10 If payment still remains outstanding, the cases are passed to one of the four companies to execute the warrants of control to collect the debt. The four companies are awarded a percentage of cases based on their successful recovery of debt from cases based on the previous six months.

3.4.11 The number of warrants have increased since the Clean Air Zone commenced in June 2021. Under the current arrangement, the Council has already received £3.7m from 2018/19 for the recovery of PCN charges (with the fee income retained by the EAs).

- 3.4.12 It should be noted that legislation has recently been introduced to allow councils to take on board the enforcement of moving traffic offences. If the Council decides to take on these powers at some point in the future, it would result in further increases to the number of cases that need to be enforced.
- 3.4.13 Full enforcement of these debts involves considerable additional set-up costs. EA's have invested in vehicles fitted with Automatic Number Plate Recognition (ANPR) to detect vehicles associated with outstanding PCNs allowing them to stop, clamp and potentially remove the vehicle. The investment also covers for costs associated with vehicle clamps being damaged/destroyed and storing the removed vehicles together with the costs to dispose of the vehicles by sale at auction/scrappage etc. At present, around 55% of warrants are not paid in full until they enter the enforcement stage and around 4-6 vehicles are authorised for removal per day.
- 3.4.14 Further work is required to establish the extent of what further EA activity could be brought 'in-house' for collecting Road Traffic debt. Conducting some pilot Enforcement stage visits for council tax and business rate recovery will assist the learning and understanding in terms of potential scope to include PCNs.

3.4.15 Proposal for in and out of scope work

- 3.4.16 All income collection areas that can be enforced under the Taking Control of Goods regulations are deemed in scope, which includes Council Tax, Business Rates, Business Improvement District levies, PCNs and Commercial Rent Arrears.
- 3.4.17 Within the areas that are in scope a phased approach is proposed due to case volumes and individual requirements for each of the areas, for example more advanced equipment.

Phase 1 Compliance stage for Council Tax, Business Rates and Business Improvement District levies. Some cases will progress through to enforcement in small numbers.

Phase 2 Both compliance and enforcement stage for Council Tax, Business Rates and Business Improvement District levies

Phase 3 Compliance and enforcement of PCNs and Commercial Rent Arrears debts

- 3.4.18 Later phases introduction of work outside of the TCOG regs, for example Debt Collection Agency work for other income streams such as sundry debts. Opportunities to outsource the service to other local authorities.

4 Options considered and Recommended Proposal

- 4.1 Please see appendix C for the options which have been considered.

- 4.2 A hybrid phased in-house approach handling up to and including the Compliance Stage for Council Tax, Business Rates and Business Improvement District debt recovery is recommended (Option 3). This will include contingency to carry out visits under the enforcement stage on a small batch of cases, where appropriate.
- 4.3 Further work needs to be completed so the introduction of the collection of the compliance fee for PCN debt can be considered, once the 'in-house' service is established and operating successfully.
- 4.4 To align procurement activity of other EA/Debt contractual arrangements where possible and practical and run compliant procurement processes in line with Public Procurement Regulations where required.

4.5 **Procurement Approach**

There are a number of procurement options available for consideration and the report seeks approval to use multiple routes based on the best approach for the various debt/enforcement services to achieve the best outcomes and timescales:

- Tender for a Council only contract –. To undertake an open procurement process. Although a collaborative framework agreement can demonstrate better value for money and timescales, this route may still be an option for the low value services.
- Use a national collaborative framework agreement's such as:
 - Yorkshire Purchasing Organisation: Enforcement Agency Services (DPS 953). Collaborative framework agreement can demonstrate better value for money and timescales and this framework although does not offer all the services /requirements may also be an option for some of the services.
 - Crown Commercial Services (RM6226) Debt Resolution Services framework that covers the services required across 20 lots.
 - The lots cover all the services / requirements.
 - 2 of the lots (lot 1 and 20) are for Managed Collection Services (Debt) and for Managed Enforcement Agency Services respectively.
 - This framework protocols allow to carry out further competitions on lots 2 to 19 and direct awards to the managed service providers (MSP) on lots 1 or 20. The Public Body contract with the MSP and then undertake analytical research to identify the most effective enforcement/debt agencies based on the Council services and requirements.

4.6 **Benefits of a Managed Service Provider**

- Vendor neutral, Managed Service Providers (MSPs) help clients source goods and services, by acting as a single point of contact for clients with no affiliation or interest in any one supplier. They act as a conduit between the contracting authority and suppliers who have had to go through a rigorous pre-qualification and accreditation process. Although the client can choose to contract manage the suppliers off of the MSP themselves in terms of performance monitoring based on collection rates, case status, case progression/turnaround, outcomes, and the number of valid complaints received. Monthly performance reports. Audits will also be undertaken by the council at agreed intervals to ensure cases are being progressed in line with legislation, the contract, CIVEA guidance, and Council policy. Strategic and operational meetings will take place at agreed intervals, at which any concerns regarding performance or compliance will be raised and addressed.
- The MSP does not seek to replace suppliers with their own service offer. Instead, when needed, they can recommend suppliers based on strength and core competencies as opposed to relationships. This helps provide a wider choice, better quality, more competitive rates where they are not regulated for these services, higher percentage collection rates and the flexibility to respond to new demands. MSPs can if needed assume primary responsibility for the management of sourcing, engagement, and administration, unless the Council's own Contract Management teams for the different areas decide to undertake this function themselves. This also helps to reduce risk, improve compliance, and supports more informed resourcing decisions.
- Each MSP have a panel of enforcement/debt agents to help you achieve the best commercial and individual outcomes. Workloads can be distributed by the Council to the best performing agencies based on quality and percentage collection rates aligned to our requirements and strategies in an ethical manner.
- Allows for an accelerated, compliant route to market for projects via further competition or direct award. This gives the Council greater agility and the ability to flex with specific requirement/service needs, and timescales whilst always engaging with the most suitable suppliers in a compliant, efficient, and effective way.
- Through the MSP framework, the Council can choose to restrict competition/award to localised areas such as a specific council borough; or can restrict competition/award to certain sectors such as micro-organisations or SMEs (Small and Medium Enterprises).
- Vendor neutral MSPs are currently used by hundreds of public sector organisations including local authorities, central government, and other

contracting authorities for specific consultancy contracts with well over £1billion of spend going through these vendor neutral models.

- Social value is embedded and incorporated within the policies, processes, procedures, and technology of the MSP frameworks.
- By having the ability via the MSP for the Council to choose which suppliers to direct award to enable us to choose the right suppliers to ensure arrears are collected in accordance with the Council's Anti-Poverty Strategy and Code of Conduct for Enforcement Agents and to adhere to statutory requirements in respect of Equal Opportunities, Health & Safety and Human Rights.
- The right suppliers are directly chosen for the protection of the image of the Council when recovering the debts on its behalf.

4.7 **How the Managed Service Provider framework model works.**

- The Council would award a contract (for the value and term) to a selected Managed Service Provider (MSP).
- Each MSP has a range of suppliers already signed up to provide the debt/enforcement services. Should the Council identify a specific requirement that cannot be met by those suppliers already on the MSP framework who perform extremely well, or provide the better percentage collection rates, new suppliers can be added to the framework easily, often in as little as 48 hours. The work to add a new supplier to the framework is done by the MSP and not the Council.
- Once awarded and in progress the Council only pays for work when pre-agreed, outcome-based, delivery milestones have been achieved. If there is a dispute regarding payment it is the MSP who deals with the supplier, not the Council.
- Via the MSP framework, the Council has access to a software platform that enables Council staff to monitor progress, both at an individual project level and across all projects/services commissioned through the MSP framework.
- There is a small management cost with the MSP with these paid for by the supplier and not the Council per case being paid by the suppliers upon a case being issued to them for collection.

5 Consultation

- 5.1 Discussions have taken place internally to assess the overall provision of debt collection across the Council. Informal discussions have been held with CAB, other external agencies and the relevant Cabinet Members and our portfolio holder.
- 5.2 Officers from Finance, Legal Services and Procurement have been consulted on the contents of the report.

6 Risk Management

- 6.1 A project group has been established from across the Council to consider all the risks and mitigations needed to implement this change. The financial impact has been included in the medium term financial plan – with an associated net £360k per annum at risk for Council Tax and Business Rates if the proposal is not accepted.

7 Compliance Issues:

7.1 How are the recommended decisions consistent with the City Council's priorities, plans and strategies?

- 7.1.1 The recommended decision supports making Birmingham a great city to live but providing urgent and important financial support to citizens and businesses within the city during an extremely difficult period of trading helping to safeguard their economic future.

7.2 Legal Implications

- 7.2.1 The Council has a duty to collect as much council tax, BID levy, and business rates under S.1(1) of the Local Government Finance Act 1992. The Council has a duty to deliver best value in the delivery of its functions under S.3 Local Government Act 1999.
- 7.2.2 The Council has a legal duty to ensure cost effective billing, collection and recovery of council tax and business rates via the Council Tax (Administration and Enforcement) Regulations 1992 and the National Non-Domestic Rating (Collection and Enforcement) (Local Lists) Regulations 1989.
- 7.2.3 The Commissioning of Debt Collection does not have any direct legal implications, by virtue of the current commissioning arrangements and the way the supplier has organised its workforce, neither BCC nor the supplier believes that the Transfer of Undertakings (Protection of Employment) regulations will apply, consequently there will be no transfer of supplier employees into the Council.

7.3 **Financial Implications**

- 7.3.1 The financial income of £360k per annum will contribute to achieving the Debt Management saving in the medium-term financial plan. This income will relate to fees from the enforcement activities described in this report. This income will come into the Council's General Fund.
- 7.3.2 A sum of £247,171 has been identified from the Invest to Deliver fund. This will enable the set-up costs to be met in advance of the operation which will see a net surplus (see below). This funding has been approved by the Section 151 Spending Control Board (on 27 September 2023).
- 7.3.3 The set-up costs for first year detailed in appendix A are to be funded by monies provided by the Invest to Deliver board, which was agreed in October 2022. After Year One it is expected that the ongoing costs can be covered by the additional income collected, resulting in a net £360k surplus.
- 7.3.4 Under the Mandatory Spending Controls debt/enforcement services falls under the below allowable expenditure criteria as agreed with the Finance Business Partner for Council Management.

f) Expenditure to address services which are under regulation, including Health, Safety and Regulatory matters

i) Expenditure necessary to achieve value for money and / or mitigate additional in year costs.

As under section f) The Council has a duty to maximise collection of council tax, BID levy, and business rates under S.1(1) of the Local Government Finance Act 1992. The Council has a duty to deliver best value in the delivery of its functions under S.3 Local Government Act 1999 and the Council has a legal duty to ensure cost effective billing, collection and recovery of council tax and business rates via the Council Tax (Administration and Enforcement) Regulations 1992 and the National Non-Domestic Rating (Collection and Enforcement) (Local Lists) Regulations 1989. i) it is used in order to maximise income to the Council on recovery of council tax, business rates, rents, parking fees, sundry debts etc.

7.4 **Procurement Implications (if required)**

- 7.4.1 Following cabinet approval to bring inhouse Enforcement agency services for Council Tax, Business Rates and Bid Levies, the recommendation is to run procurement exercises for the other remaining debt/enforcement services (see Appendix B – Exempt Information) as and when needed by way of compliant mechanisms in line with Council Procurement and Contract Governance Rules and Public Procurement Regulations 2015 (2106 amended). This will ensure contract coverage is encompassed for the remaining services during a period of stabilisation and incremental growth. A further review will then take place to

consider these remaining services being delivered as part of a third stage of the inhouse service transformation project. Estimated to be in between 2 to 3 years' time.

- 7.4.2 Cabinet approval for a new contract for Council Tax, Business Rates and Bid Levies using the Crown Commercial Services (RM6226) Debt Resolution Services framework for a period of up to 12 months commencing from the date this Cabinet report is approved for the value of £4.0m (See Appendix B – Exempt Information) in line with the procurement governance arrangements and Public Procurement Regulations, as an interim measure for Council Tax, Business Rates and Business Improvement District debt recovery, while these services are brought inhouse.

7.5 **Human Resources Implications (if required)**

- 7.5.1 The Commissioning of Debt Collection does not have any direct HR implications, by virtue of the current commissioning arrangements and the way the supplier has organised its workforce, neither BCC nor the supplier believes that the Transfer of Undertakings (Protection of Employment) regulations will apply, consequently there will be no transfer of supplier employees into the Council.

- 7.5.2 There is a requirement for a new team of 14 staff (12 under existing job descriptions). During the first phase of the project the service will predominately carry our desk top collection processes which would involve answering customer calls as a result of recovery correspondence, tracing work and outbound collection calling. A small number of external visits would also take place as part of a process pilot for the purposes of phase two.

- 7.5.3 The recruitment will be phased to take into account the gradual increase in the workload with all staff being fully trained and those that require it, being licensed and receiving appropriate PPE to ensure their wellbeing Risk assessments will be conducted and the normal TU consultation will be undertaken.

7.6 **Public Sector Equality Duty**

- 7.6.1 An equality impact assessment has been completed 5 January 2023 under reference EQUA1043. There are no adverse findings and approval is recommended.

7.7 **Environmental and Sustainability Implications**

- 7.7.1 An Environmental and Sustainability Assessment has been completed and approved. (See Appendix E) The service will utilise technology and electronic communications thereby reducing the requirement for printing and postage of notices and letters. Where visits to properties are required, it is proposed

enforcement agents will use electric vehicles and will plan and prioritise their route to ensure that travel within the area is minimised.

8 Appendices

- 8.1 Appendix A – Full Business Case
- 8.2 Appendix B – Exempt Information
- 8.3 Appendix C – Options Appraisal
- 8.4 Appendix D – Equality Impact Assessment
- 8.5 Appendix E – Environmental and Sustainability Assessment

9 Background Documents

- 9.1 MTFP document that approved the outline business case