FINANCIAL INCLUSION STRATEGY

CORPORATE DEBT COLLECTION & RECOVERY POLICY

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Brighton & Hove City Council

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1 INTRODUCTION

- 1.1 The council has a duty to ensure that all monies owed to the council (debts) are collected efficiently and effectively for the benefit of all council taxpayers.
- 1.2 In striving to continually improve collection and recovery performance, the council recognises that some people may be unable to pay their debts for a variety of reasons. This may include poverty or other reasons for financial exclusion, which the council will endeavour to balance against its duty to collect. Clearly, the council must collect amounts due wherever possible on behalf of its residents and tax payers and will pursue all available recovery routes where it is clear that individuals or businesses have the means and ability to pay.
- 1.3 The need for people or businesses in debt to communicate their financial status is important. Where a person or business makes contact with us, their circumstances will be considered with a view to agreeing a reasonable payment arrangement (except in the case of statutory timescales), minimising recovery action and helping to alleviate hardship or potential insolvency. Where people or businesses fail to make contact or maintain agreed arrangements, recovery action will continue. However, in doing so, the council will ensure that its debt collection and recovery policy and practice is fair to everyone notwithstanding their age, race, gender, disability, sexuality or religious belief.
- 1.4 This policy details the council's corporate approach to recovery including how it prioritises debt outstanding. Where possible, best practice will be applied to all debt collection and recovery activities within appropriate legal powers. Clearly, this policy is aimed primarily at individual debtors ('Personal Debt') but wherever possible and where legislation allows, the principles and objectives of this policy will also be applied to businesses from all sectors ('Business Debt').

2 POLICY AIMS

- 2.1 The key aims of this policy are as follows:
 - To develop a council-wide approach towards sharing debtor information across collection teams and managing multiple debts owed to the council, whether business or personal debt.

- To use cost effective and fair collection and recovery practices in the pursuance of all debts owed to the council, ensuring that those with the means to pay do pay.
- To ensure a professional, consistent and timely approach to recovery action across all of the council's functions.
- Where their ability to pay is compromised, to consider debtors' circumstances on a case-by-case basis, taking into account all debts where possible, and providing appropriate signposting, support and advice to promote financial inclusion.
- To improve the levels of income collected by the council and reduce levels of arrears (debt).
- To treat individuals consistently and fairly in accordance with equality legislation and ensure that individual's rights under Data Protection and Human Rights legislation are protected.

3 SUPPORTING THE COUNCIL'S PRIORITIES

- 3.1 'Tackling inequality' is a key priority for the council and Financial Inclusion is an important aspect of this. This policy therefore aims to support this priority and Financial Inclusion by:
 - Ensuring that this policy remains commensurate with any Financial Inclusion Strategy and actions approved by the council.
 - Requiring that income collection and recovery procedures and practice across the council are aligned with this policy.
 - Ensuring that individual debtors in financial hardship are provided with advice on relevant welfare rights and benefits, discounts, relief and exemptions to prevent a worsening situation.
 - Where individuals may qualify, to signpost people to relevant discretionary payments or funds.
 - Considering longer-term payment arrangements for debtors suffering genuine hardship, although this may not be available for some debts with statutory timescales, such as Penalty Charge Notices (parking tickets).
 - Considering referral to discretionary funds for debtors suffering genuine hardship or where recovery action would lead to

potentially greater costs for the council. Note, this may not be available for some debts with statutory timescales, such as Penalty Charge Notices (parking tickets)

- Ensuring that all debts owed to the council are taken into account, with the debtor's consent, to ensure that the council does not increase hardship where different council services may be seeking to recover debts.
- 3.2 'Creating a more sustainable city' is also a key council priority. The council will therefore take into account the wider potential impact of debt recovery actions. This applies particularly to business debtors where the failure of a business can have wider economic and sustainability implications for the locality.

4 FAIR DEBT COLLECTION

- 4.1 This policy aims to adopt fair debt collection and recovery practices including:
 - Ensuring that bills are accurate, timely and clear.
 - Providing appropriate and easy payment methods.
 - Encouraging people and businesses who fall into arrears to contact us and agree to payment arrangements appropriate to their circumstances.
 - Helping to reduce the effect of debt on people on low incomes by informing people about welfare benefits and helping them to achieve maximum benefit take-up.
 - Advising people and businesses where they can get independent advice with financial problems (e.g. Citizens Advice Bureau or the Money Advice & Community Support).
 - Developing 'standard' recovery practices that are fair and reasonable;
 - Once debts have moved beyond standard recovery procedures, treating outstanding debts on a case-by-case basis and applying the principles of this policy in determining the treatment and recovery of the debt.

5 DEBTS COVERED BY THIS POLICY

5.1 All debts are covered by this policy. The main areas of income and debt are shown below together with the council service responsible for collection and recovery:

Personal Debts:	Collected/Recovered by:
Council Tax	City Services – Revenues & Benefits Service
Housing Rents	Housing Management – Housing Rents Section
Temporary Accommodation	Housing Management – Temporary Accommodation Credit Control
Overpaid Housing Benefit	City Services – Revenues & Benefits Service
Sundry Debts (Personal)	Corporate Debtors Unit (CDU)
Adult Social Care Fees & Charges	Corporate Debtors Unit (CDU)
Penalty Charge Notices (parking tickets)	Parking Management

Business Debts:	Collected/Recovered by:
National Non Domestic Business Rates (NNDR)	City Services – Revenues & Benefits Service
Commercial and Periodic Rents	Corporate Debtors Unit (CDU)
Sundry Debts (Business)	Corporate Debtors Unit (CDU)
Penalty Charge Notices (parking tickets)	Parking Management

Note, Sundry Debts include the following items:

- Commercial Property Rents
- Adult Social Care charges
- Life Events charges (Registrars, Crematorium and other services)
- Library Service charges and fines
- Planning and Building Control fees
- License fees

- Highways fees and fines (excludes Parking)
- Leaseholder, Garage and other Service Charges
- Royal Pavillion, Museums and other Venues charges
- Trading Standards and Environmental Health charges
- Educational facilities and lettings charges
- 5.2 For housing rent, statutory Housing Benefits are provided upon application, which are designed to offset the effects of low income on ability to pay. The Council Tax Reduction Scheme also provides for reduced Council Tax liability for pensioners and working age people on low incomes. Every effort will also be made to identify benefits and other welfare rights that may be payable or available to people liable to pay toward the cost of personal social care services.
- 5.3 Charging policies, statutory or discretionary, can never completely remove the difficulties faced by some people and families on low incomes. The approach to recovery will therefore be sensitive to individual circumstances and take into account multiple debts owed within statutory limitations.
- 5.4 All income collection and recovery services adhere to the council's 'Customer Promise' which is a customer service commitment to everyone who uses council services.

6 THE LEGAL AND POLICY FRAMEWORK

- 6.1 This policy is in addition to existing legislation and is designed to enhance the procedures already in place to collect debt.
- 6.2 This policy is concerned primarily with the recovery of debts prior to legal action being taken but the principles will still be applied wherever appropriate, even if litigation has commenced.
- 6.3 The setting of fees, charges, rents, licences or fines is not covered by this policy. Some of these are statutory (e.g. Council Tax) while others are discretionary and are set and approved locally by the council (e.g. Library Service charges and fines). However, once determined, all are legally collectable and recoverable. However, the collection and recovery of some categories may also be covered by specific legislation and/or regulations for collection and recovery including:
 - Council Tax
 - National Non-Domestic Rates (Business Rates)
 - Housing Benefit Overpayment recovery
 - Council Housing Rents
 - Penalty Charge Notices (Parking and Bus Lane enforcement)
 - Leaseholders
 - Residential Care charges

Collection and recovery of all other categories is covered by general legislation or common law.

7 THE POLICY IN PRACTICE

- 7.1 Full names, contact address and a phone number will be established wherever possible prior to service provision or invoicing/billing.
- 7.2 All council bills and invoices will be raised as soon as relevant systems allow and will include clear, relevant and full information as to:
 - What the bill is for including date or period of service covered and amount
 - When payment is due
 - How to pay
 - How to contact us if there is a query in relation to the bill or in relation to making payment
 - Where information in other languages can be accessed
- 7.3 All letters and reminders will:
 - Be written in plain English standard
 - Explain fully what has been agreed and the consequences of non-payment
 - Include appropriate contact details
 - Be commensurate with appropriate legislation
- 7.4 Debtors will be encouraged to make prompt contact if they disagree with a bill or have difficulty in making payment on time. Contact can be made via:
 - Web Site
 - Text/SMS
 - Telephone
 - Letter
 - Email
 - Fax
 - In person or through an advocate or intermediary

Full contact details are available on bills and the council's web site.

PERSONAL DEBTS

7.5 For Personal Debts, debtors seeking help due to financial difficulties will, where appropriate:

- be asked if they have other debts owing to the council that they
 also wish to be considered to avoid them falling into the situation of
 paying one debt only to build up arrears on another;
- be given the opportunity to have their ability-to-pay assessed by the relevant collection unit and be invited to provide details of their means by listing their income and outgoings (evidence to confirm the accuracy of the means statement will be requested if necessary);
- be encouraged to use the money advice services listed on the council's website and be signposted to welfare rights advice, where appropriate.
- where they may qualify, to signpost them to appropriate discretionary payment schemes (e.g. Discretionary Housing Payments) or discretionary funds (e.g. Council Tax Reduction Scheme Discretionary Fund) for further assessment.
- 7.6 If a debtor takes up the offer to deal with all council debts collectively, the various collection units will communicate the debtor's details confidentially between themselves and will endeavour to take a holistic approach to collection without prejudice to their own collection unit. The collection units will agree who will be the appropriate lead team responsible for managing each case. This will often be the collection unit handling the largest outstanding debt. The collection units will also agree the priority allocation of any payments to outstanding debts using a guiding set of principles.
- 7.7 Where there is no continuous liability, a special long-term arrangement may be made according to the ability to pay and the existing recovery provisions, for example, an attachment of earnings. Where liability is continuous e.g. Council Tax, any arrangement made will normally require payments over and above the ongoing monthly liability. Future instalments must be paid when due as a condition of the arrangement.
 - For example, someone owing Council Tax arrears of £600 in March has a new bill issued requiring monthly instalments of say £75.00 from April. They must pay the £75.00 each month, but could be allowed to spread the arrears of £600.00 plus any other council debts over an agreed period. The £75.00 per month would be taken into account when assessing their ability to pay the £600 arrears. If the period agreed was, say, 10 months to match the instalment period

for the new bill, the monthly Council Tax payment would be £135.00 (£75.00 plus £60.00).

- 7.8 If only the current year's bill is owed, arrangements should normally require payment within the financial year wherever possible. Longer-term arrangements for older arrears will be strictly monitored and reviewed. If there is no improvement by the review date and if the amount payable cannot be reduced, the council will reserve the right to continue with legal action, and in the case of Local Taxation, obtain a liability order from the magistrates' court. This is to protect the council's interests and prevent the debt from becoming statute barred and irrecoverable. Nevertheless, regular contact with the debtor will be undertaken and part payments will be accepted to reduce the overall debt.
- 7.9 Debtors given time to pay will be advised to contact the council immediately should they experience a change of circumstances affecting their ability to pay. This is to discuss the options available to prevent recovery action and additional costs.
- 7.10 If a debtor chooses not to co-operate by:
 - refusing to provide details of their income or expenditure, and/or;
 - not consenting to multiple debts being dealt with together, and/or;
 - failing to pay a special arrangement on time without contact,

then the council must immediately continue recovery action in the normal way.

BUSINESS DEBTS

- 7.11 For Business Debts, debtors seeking help due to financial difficulties will, where appropriate:
 - be considered for alternative payment plans on a case-by-case basis taking into account all debts owed to the council;
 - be signposted to relevant advice agencies where appropriate.
- 7.12 If legal proceedings have already commenced, consideration will be given to the priority of the debts owed and the level of repayments currently being made.
- 7.13 If a specific recovery action has already commenced e.g. bailiff action, the action taken will usually continue. However, any arrears not included

- in the action will be considered in line with existing arrangements and this policy and relevant legal constraints.
- 7.14 If it is found that the business has the ability to pay, but refuses to pay, then recovery action will continue promptly within the existing arrangements for the type of debt.
- 7.15 If a business takes up the offer to deal with all council debts collectively, the various collection units will communicate the debtor's details confidentially between themselves and will endeavour to take a holistic approach to collection without prejudice to their own collection unit. The collection units will agree who will be the appropriate lead team responsible for managing each case. This will often be the collection unit handling the largest outstanding debt. The collection units will also agree the priority allocation of any payments to outstanding debts.
- 7.16 Where there is no continuous liability, a special long-term arrangement may be made according to the ability to pay and the existing recovery provisions. Where liability is continuous e.g. Business Rates (NNDR), any arrangement made will normally require payments over and above the ongoing monthly liability. Future instalments must be paid when due as a condition of the arrangement.
 - For example, a business owing Business Rate arrears of £600 in March has a new bill issued requiring monthly instalments of say £75.00 from April. They must pay the £75.00 each month, but could be allowed to spread the arrears of £600.00 plus any other council debts over an agreed period. The £75.00 per month would be taken into account when assessing their ability to pay the £600 arrears. If the period agreed was, say, 10 months to match the instalment period for the new bill, the monthly Business Rate payment would be £135.00 (£75.00 plus £60.00).
- 7.17 If only the current year's bill is owed, arrangements should normally require payment within the financial year whenever possible. Longer-term arrangements for older arrears will be strictly monitored and reviewed. If there is no improvement by the review date and if the amount payable cannot be reduced, the council will reserve the right to continue with legal action. This is to protect the council's interests and prevent the debt from becoming statute barred and irrecoverable. Nevertheless regular contact with the debtor will be undertaken.

- 7.18 Businesses given time to pay will be advised to contact the council immediately should they experience a change of circumstances affecting their ability to pay. This is to discuss the options available to prevent recovery action and additional costs.
- 7.19 If a business fails to co-operate by:
 - not consenting to multiple debts being dealt with together, and/or;
 - failing to pay a special arrangement on time without contact,

then recovery action will be taken promptly in the normal way.

8 LIMITATIONS ON DEBT RECOVERY

- 8.1 All in-house or external bailiffs appointed will be given a code of conduct requiring them to refer to the council, before proceeding to take action, and will be used according to approved procedures.
- 8.2 Referrals to bailiffs for levying distress will normally only be undertaken where there is reasonable likelihood of recovery. This covers Local Taxation debts where the power to remove goods is granted by the Magistrates Court.
- 8.3 Unless otherwise authorised, referrals to collection agencies or bailiffs for debts where there is no power to levy distress, will not be made where this is uneconomic.
- 8.4 Existence of disputed debts must be fully evidenced before litigation can proceed.
- 8.5 Vulnerable debtors and those lacking mental capacity may need a designated "litigation friend" to deal with the proceedings.
- 8.6 In some instances, for example insolvency or bankruptcy of a debtor, it may be necessary to write off debt. The write off of any debt is governed by the council's Financial Regulations and requires Chief Finance Officer (\$151) approval.

9 MONITORING

- 9.1 Each unit/section will be responsible for ensuring that this policy is adhered to and effective. Management information will be required for each debt stream on a monthly basis. The numbers of long-term arrangements, money advice referrals and multiple-debt management arrangements will be recorded.
- 9.2 The council's Internal Audit team will test compliance with this policy in future reviews and will report thereon to management.
- 9.3 Regular meetings between responsible officers nominated by each collection unit/section, known as the Corporate Debt Management Group, will be held at least quarterly to ensure that best practice is kept under review.

APPENDIX - DEBT AND MONEY ADVICE AGENCIES

Debt Advice Agencies

The agencies listed below may be able to offer you advice and assistance in dealing with money and debts.

StepChange Debt Charity (formerly Consumer Credit Counselling Service)

Registered charity offering free, impartial, confidential advice and support to anyone who is worried about debt. Dealing with debt can be a stressful experience but it need not be a challenge you face alone. Step Change Debt Charity (CCCS) has been providing free debt help to people across the UK for over 15 years. The services they can offer include debt counselling, personal budgeting, advice on borrowing and advice on setting up realistic debt repayment plans. StepChange can also help with identifying your highest priority debts and living expenses and can help you negotiate with your creditors. Use their online tool, StepChange Debt Remedy, for an instant assessment of your situation with free advice tailored to your individual needs.

- Website: www.stepchange.org
- StepChange Debt Remedy (on-line debt counselling service)
- StepChange Guide to debt management plans
- Tel: (0800) 138 1111

Opening Times: Monday-Friday 8am-8pm; Saturday 9am-4pm

Brighton & Hove Citizens Advice Bureau (CAB)

Citizens Advice Bureau
Offers free, confidential, impartial, and independent advice on managing your finances, including opening bank accounts, problems with bank accounts, benefit overpayments, council rent arrears, budgeting and general debt problems.

- Office based at Hove Town Hall, 1 Tisbury Road, Hove, BN3 4AH
- Drop-in advice times (held at the CAB offices at Hove Town Hall): Mon-Fri: 9.15am-11.15am.
- Tel: (01273) 223951

- Phone line open Monday, Wednesday & Thursday: 9.30am-12 noon & 1pm 3.30pm. Tuesday & Friday: 9.30am 12 noon.
- Website: www.brightonhovecab.org.uk

National Debtline

Free, confidential and independent telephone helpline service on debt issues. Offers specialist advice, self-help materials and individually tailored Debt Management Plans. Language Line, an interpreter service, is available offering professional telephone interpreters in over 100 languages to translate what you and the adviser are saying to each other.

Tel: (0808) 8084000

Line open: Monday-Friday 9am - 9pm. Saturday 9.30am - 1pm

Website: www.nationaldebtline.co.uk

My Money Steps

Struggling to pay credit cards, loans or household bills? My Money Steps is a free and easy to use online debt advice service from National Debtline. It will give you a personalised action plan to manage your debts and help get rid of the stress that goes with them.

Website: www.mymoneysteps.org

Brighton Housing Trust Advice

Brighton Housing Trust (BHT) can provide specialist legal advice on housing, immigration, welfare benefits and debt at their advice centre in Brighton. BHT also has an advice centre in Eastbourne. See their website for more details.

Address: Community Base, 113 Queens Road, Brighton, BN1 3XG

• Tel: **(01273) 234737**

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Email: advice@bht.org.ukWebsite: www.bht.org.uk

Money Advice Service



Service provides clear, impartial information about UK financial services to help you manage your money better and make more informed financial service choices. The website contains a section devoted to getting free debt advice. The Money Advice Service was set up by the government, is funded by the UK financial services industry and is run by an independent chair and board, appointed by the UK Financial Conduct Authority.

- Tel: (0300) 500 5000 calls should cost no more than 01 or 02 UK-wide calls and are included in inclusive mobile and landline minutes. You can also ask to be called back.
- Opening Times: Monday-Friday 8.00am-8.00pm. Saturday 9.00am-1.00pm
- Website: www.moneyadviceservice.org.uk

St Luke's Advice Service

Provides help with completing welfare benefit forms, appeals, correspondence with creditors and can offer legal representation at tribunals. Specialises in debt solutions such as agreeing suitable repayments and negotiating with creditors. Also offers help with income and expenditure forms, and advice on Individual Voluntary Arrangement (IVA) or Bankruptcy.

- Address: 18 Exeter Street, Brighton, BN1 5PG
- Opening times: Monday, Wednesday & Thursday 10am 4pm. Friday 10am 1pm
- Tel: (01273) 549203
- Email: info@stlukesadviceservice.org.uk
- Website: www.stlukesadviceservice.org.uk

Debt advice from Shelter

Shelter, the housing charity offers advice on dealing with debts and advice on where to get expert help.

Website: http://england.shelter.org.uk/get advice

Debt Advice Foundation

Registered UK **debt advice** charity offering free, confidential support and advice to anyone worried about debt. Can offer you information on what options are available to you based on your own personal circumstances.

- Tel: (0800) 043 40 50
- Lines Open: Monday-Friday 8am 8pm. Saturday 9am 5pm
- If you're calling from a mobile phone, you can ask to be called back.
- Website: www.debtadvicefoundation.org

Debt Support Trust



The Debt Support Trust is a national charity offering advice on dealing with debts, including the use of debt management plans, Individual Voluntary Arrangements (IVAs), Bankruptcy, Protected Trust Deeds* and Sequestration* (*for people living in Scotland).

- Website: www.debtsupporttrust.org.uk
- Helpline: 0800 085 0226
- Opening times: Monday-Friday 8am 7pm

Money Advice and Community Support

Money Advice and Charity providing a welfare benefit and debt advice telephone line. The service is impartial and confidential and the advice is free.

- Office address: 24 Old Steine, Brighton, BN1 1EL
- Advice line: (01273) 664040
- Line Open: Monday, Wednesday & Thursday 10am 12 noon. Tuesday & Friday 2pm - 4pm. Outside of these hours you can call and leave a message to request a call-back.
- Email: info@macss.org.uk
- Website: www.macss.org.uk

East Sussex Credit Union



East Sussex Credit Union is a not-for-

profit savings and loans co-operative focusing on the needs of those on low incomes. The credit union offers easy-to-access savings accounts and affordable, flexible loans. It is authorised and regulated by the Financial Services Authority with savings 100% guaranteed by the FSA Compensation Scheme.

If you are in debt and are looking for ways to raise some money or if you've been refused loans by the high street banks, East Sussex Credit Union can offer an alternative to the high-cost loans offered by predatory lenders or doorstep lenders, sometimes referred to as loan sharks.

- Address: Community Base, 113 Queens Road, Brighton, BN1 3XG
- Help Point at Community Base: Mon-Fri 10am 3pm (call for details of help points outside of Brighton & Hove City Council's area.)
- Tel: (01273) 234 858 open Mon-Fri 10am 4pm
- Email: info@eastsussexcu.org.uk
- Website: www.eastsussexcu.org.uk

Knoll Advice Centre



Advice on housing, debts and benefits for residents of Hangleton and Knoll estates and bordering areas.

- Open Mondays 10.00am-1.00pm (except bank holidays)
- Tel: (01273) 410 383
- Address: St Richard's Church & Community Centre, Egmont Road, Hove, BN3
 7FP

Business Debtline

Business Debtline

The Business Debtline provides a free

telephone debt counselling service for the self-employed and small businesses facing financial hardship.

• Tel: **(0800) 197 6026**

Lines open: Monday-Friday 9am - 5pm

Website: www.bdl.org.uk

Payplan



Offers free, impartial debt solutions tailored to meet personal circumstances such as Debt Management Plans (DMPs) and Individual Voluntary Arrangements (IVAs). Payplan is part-funded by donations from the UK credit industry. It is not a registered charity.

Tel: (0800) 280 2816

Lines open: Monday-Friday 8am - 9pm, Saturday 9am - 3pm

Website: www.payplan.com

Online resource: Gov.uk guide to dealing with debt problems



Step-by-step guidance provided by the UK Government's public services access website: www.gov.uk/options-for-paying-off-your-debts

Money Matters Online



A collection of links vetted by Brighton & Hove Library Service and designed to help you with money and finances.

Website: www.brighton-hove-rpml.org.uk/Libraries/MoneyMattersOnline

Online resource: Citizens Advice Bureau (CAB) Advice Guide



Online help provided by the Citizens Advice Bureau:

www.adviceguide.org.uk

Online resource: Brighton & Hove NHS ~ Information Prescriptions



The Information Prescriptions website has been developed to help people with long term health conditions or social care needs. The website offers information and links to support organisations that can help people manage their conditions better and live longer, healthier and more independent lives. The site includes tips on where to look for financial advice and benefits advice, both locally and nationally - go to: www.ipbh.org.uk/financial-advice-and-benefits

Online resource: Martin Lewis ~ Money Saving Expert



Guidance on dealing with debt, including budgeting advice, a useful budgeting tool and ways to make your money go further. There's also a guide to mental health & debt. The website is run by Martin Lewis. It is not a registered charity. Website: www.moneysavingexpert.com

Legal Aid



Legal Aid can help you pay for legal advice, mediation or representation in court if you can't afford it. This could include help for housing or debt problems. The Gov.uk website has an online Legal Aid checker to help you find out if you are entitled to this help.

Legal Aid on the Gov.uk website: www.gov.uk/legal-aid

Online resource: Gov.uk Benefits Adviser

Many people are missing out on benefits and tax credits by not knowing that they may be entitled to them. The Benefits Adviser is an online questionnaire to help you find out which benefits and tax credits you and your family may be entitled to. No personal information is required. The Benefits Adviser tool is provided by Gov.uk, the UK government's public services access website: www.gov.uk/benefits-adviser

talk about debt

talkaboutdebt

Directgov

The talkaboutdebt website provides useful information and tips on dealing with debts and suggestions on which of the national debt help organisations might be more suited to help you, based on your circumstances. The website also has some reviews of debt management companies and debt help charities from people who have used them. The website is run by Talk About Holdings Limited. It is not a registered charity. Website: www.talkaboutdebt.co.uk