



Consultation response

Shelter Specialist Debt Advice Service response to “Modernising and improving the administration of council tax”

September 2025

About SDAS

Shelter’s Specialist Debt Advice Service (SDAS) has been operating since 2017 and is funded by the Money and Pensions Service (MaPS) and the Welsh Government to provide expert consultancy advice and technical content to Citizens Advice, free-to-client advice agencies, local authorities and housing associations across England and Wales.

The accessible, responsive, expert advice Service is delivered by a telephone advice line, webchat and an online portal. The service handles around 5,000 enquiries per year across a broad range of debt topics, including debt relief orders, breathing space, bankruptcy, County Court money judgments, mortgage possession and council tax.

The Service also develops and publishes a range of legal and technical updates, including a monthly e-bulletin, contributions to the IMA Quarterly Account publication, and ad hoc articles. The updates are made available to SDAS subscribers, as well as being published on the SDAS website and the Debt section of Shelter Legal.

Additionally, the Service has developed and implemented a strategy for raising awareness of debt issues amongst debt advice providers. We attend Money Advice Group meetings, lead discussion forums to share good practice, plan policy initiatives and attend quarterly meetings with the Insolvency Service to discuss themes, trends and suggest changes to debt solutions guidance.

Consultation response

The Specialist Debt Advice Service has provided answers to the questions where it can offer insights. Questions without an answer submitted are omitted, please categorise these as 'no view'.

Question 1: The government intends to change the default bill instalments from 10 months to 12 months. Do you agree with this approach? Why/why not?

Most people living in the UK receive regular income from welfare benefits¹, PAYE employment², or a combination of both. This means a steady stream of income which can be budgeted around on a regular basis (e.g. weekly or monthly).

Almost all household costs are based around a 12-month cycle, including water, gas and electricity, rent, and phone and broadband. While some offer alternate payment methods such as payment in full or annual billing or quarterly billing, bills paid monthly is the default for most household expenditure.

Aligning Council Tax to this same billing cycle will make household budgeting easier. It also avoids any confusion about what months Council Tax is due and not, particularly for customers who are not on Direct Debit and make payments in other ways.

For customers in debt (whether it be Council Tax or other obligations), a 12-month payment schedule makes debt management easier, because customers (and their debt advisers) can design a single budget for the entire year that is accurate. This also reduces the impact on certain debt solutions such as Debt Relief Orders, bankruptcy, or Individual Voluntary Arrangements as customers will have fewer changes in circumstances, particularly around their monthly outgoings.

Question 2: If the government were to move to 12-month instalments by default, should taxpayers be able to request to pay in 10-monthly payments?

Although the standard repayment period should be changed to 12 months, local authorities should continue to provide alternate repayment schedules, whether this be annual payments in full, quarterly, over 10 monthly payments or weekly. This is because

¹ <https://www.gov.uk/government/statistics/universal-credit-statistics-29-april-2013-to-9-january-2025/universal-credit-statistics-29-april-2013-to-9-january-2025>

² <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/bulletins/earningsandemploymentfrompayasyouearnrealtimeinformationuk/july2025>

some taxpayers may prefer having some months where no payments are due and could also align with other utility or insurance payments over the course of the year.

Making council tax information more transparent

Question 6: Do you feel you have a good understanding of the support offered by your council and how to claim this? How might this be improved?

Under Schedule 13(3) and 13(4) of [The Council Tax Reduction Schemes and Prescribed Requirements \(Wales\) Regulations 2012](#), local authorities in Wales have a statutory duty to backdate applications for council tax support / reduction by a minimum of three months. They also have the discretion to backdate further than this.

Local authorities in England should share the same statutory obligation to backdate applications for support by at least three months, to ensure that support is provided to taxpayers making delayed applications.

Question 7: What further information, if any, do you think would be helpful to see on this support? How should this be presented?

Taxpayers should be given clear information about their liability to pay Council Tax, including a breakdown of discounts available, and making clear that certain discounts (such as those under Council Tax Support/Reduction) are not automatically included as part of existing claims for benefits. The consultation states that this is currently optional (page 13); we believe that providing this information should be mandatory by council and as part of the Universal Credit application process.

This information should be given alongside the annual bill each year and should be issued to taxpayers upon a council being made aware of a move of property. For local authority rented tenants, this should be straightforward but would require both the council tax and rental property department of the local authority to work together (see answer to question 26 regarding collaboration between council departments).

Enforcement of council tax

Question 23: The government is interested in changing regulations on when councils can request a full bill, or seek liability orders, to a more appropriate and proportionate timeframe.

How long after a reminder notice, should full liability apply:

- after 31 days

A taxpayer's full council tax liability should apply at least 31 days after the reminder notice.

This length of time would allow a taxpayer to seek free debt advice, review their financial position, apply for any available council tax support / reduction and inform the council of any vulnerabilities that should be considered. Contained within the reminder notice should be information about how to obtain free debt advice and how to apply for council tax reductions (via the Council Tax Support (LCTS) scheme and other discount and exemption schemes) to reduce their overall liability – a step that should already be done by councils according to the ['Council tax collection: best practice guidance for local authorities'](#), but is rarely seen in practice.

However, councils should retain their discretion to recall the reminder notice at any time and allow taxpayers to revert to monthly instalments without the threat of a liability order being obtained. This would be on the condition that the taxpayer can show affordability, this could be independently or with support from a free debt advice agency (for whom the council should have a dedicated team to allow quicker communication).

Question 24: Are there any further steps councils should take before being able to charge for a full-year's bill? For example, offering alternative payment plans, providing further reminder notices or undertaking welfare checks.

We agree with the government's assertion that the current enforcement practices are heavy-handed, disproportionate and do not properly consider the impact on vulnerable taxpayers. We also agree with the government that councils are taking aggressive recovery action too quickly and too intensely. Anecdotally, we are aware of councils that have applied to declare a taxpayer bankrupt before considering other methods of recovery, for example, deductions to benefits (see answer to Question 30).

Before a council can request a liability order, the minimum requirements should be as follows:

Welfare checks: checks of this nature must be carried out where correspondence remains unanswered and no payment arrangements have been organised. It may be that the name or address (or both) are incorrect, English is not the taxpayers first language, or they have other vulnerability (for example learning difficulties), this is not an exhaustive list.

The process of a welfare check could be:

- Establishing that the taxpayer in question is liable. If so, ensure that the taxpayer has been provided with information about alternate payment arrangements and discounts they may be eligible for.
- Proactively check for taxpayer vulnerabilities³, such as where information has been recorded by the taxpayer in applications for benefits or with their housing officer.
- Send a letter to the address on file, giving 5 working days for the taxpayer to respond.
- If there is no response, then an authorised person should attend the property (there should be no power to force entry, request a financial statement or any documentation), the propose of the visit is to establish contact and any reasons for the lack of engagement.
- If contact is made, the authorised person should establish the best method of communication, direct the taxpayer for additional support (e.g. signposting to a free debt advice agency or adult social care, whichever would be most appropriate depending on the taxpayer's personal circumstances).
- If no contact is made at the first visit, a calling card or letter should be left at the property giving an additional 5 working days to make contact before a second visit.
- A second visit is attempted, with the same purpose as the first.

It is only after this second visit that a reminder notice should be considered, and without this step a court should be prevented from issuing a liability order against a taxpayer.

Alternative payment plans: Councils should allow taxpayers to pay their council tax weekly, monthly, quarterly or annually. This flexibility will assist taxpayers to better budget their expenditure and may assist with a council's cashflow.

Checking discounts and exemptions: Due to different approaches each council has when applying discounts and exemptions, there should be a duty on that council to ensure that all relevant discounts and / or exemptions are applied to a taxpayer's liability before a reminder notice is issued. Where there is no evidence that this has been done,

³ [Lock v Aylesbury Vale District Council \[2018\] EWHC 2015 \(Ch\)](#)

a liability order should not be granted. At present, there is no legal duty to conduct these checks and there are no legal ramifications for failure to do so.

Furthermore, there should be a consistent approach across all local authority areas on how discounts and exceptions apply; this is because one council could apply a 100% reduction, while another may only apply an 80% reduction in the same circumstances ([Money Saving Expert](#) explains the 'council-by-council' reduction scheme in more detail). This results in a council tax liability lottery where different taxpayers in different local authority areas receive unequal levels of support. This is unacceptable when other support (such as Universal Credit) is the same in all areas across England and Wales.

Moreover, there should be much better communication between council departments. This means, for example, that a taxpayer's account should be flagged for review if they start working with social care. We have seen examples of taxpayers working with a separate council department to apply for a council tax reduction, but this information had not been communicated to the council tax recovery team who were actively pursuing the taxpayer for arrears. This approach is detailed in part 2 of the '[Council tax collection: best practice guidance for local authorities](#)' this section highlights the possible 'efficiency savings' of this approach and the idea of a 'single view of debt', which in the debt advice sector, is rarely seen.

Proactively checking council tax band: Council tax bands are still based on how much a property was worth or would have been worth on 1 April 1991 in England (34 years ago), and we have seen many instances where a property band is incorrect, resulting in incorrect taxpayer liability⁴.

Where a property band is set too high, it may be that the taxpayer is paying more than they should be and therefore any excess payments up until the correct band is applied should be returned to the taxpayer as soon as possible.

Where a property band is set too low, the taxpayer will be liable to pay the shortfall in council tax. In these instances, liability should not be applied retrospectively without giving the taxpayer an opportunity to dispute any band changes. At present, the responsibility to check whether a property is correctly banded falls on the taxpayer, who may not be aware of this process.

Discretionary reductions: At present, councils have the power to award discretionary reductions to a taxpayer's council tax liability under [section 13A of the Local Government and Finance Act 1992](#) which says:

(1) The amount of council tax which a person is liable to pay in respect of any chargeable dwelling and any day (as determined in accordance with sections 10 to 13) –

⁴ [Council tax collection: best practice guidance for local authorities - GOV.UK](#)

(a) in the case of a dwelling situated in the area of a billing authority in England, is to be reduced to the extent, if any, required by the authority's council tax reduction scheme (see subsection (2));

(b) in the case of a dwelling situated in the area of a billing authority in Wales, is to be reduced to the extent, if any, required by any council tax reduction scheme made under regulations under subsection (4) that applies to that dwelling;

(c) in any case, may be reduced to such extent (or, if the amount has been reduced under paragraph (a) or (b), such further extent) as the billing authority for the area in which the dwelling is situated thinks fit.'

This means that, in addition to having a council tax reduction scheme, each council has the power to reduce a taxpayer's council tax liability by as much as it 'thinks fit'. The problem is that a taxpayer must formally request a reduction of this nature, and each council has their own policy position on when this should be applied (this is also an area which is in dire need of reform).

It should be noted that this is not an exhaustive list, and other steps could be required depending on a taxpayer's personal circumstances.

There should be a legal duty on councils to take all reasonable steps to ensure that a taxpayer's liability is properly assessed for accuracy. Evidence of the steps above should be documented as part of any request for a liability order. Without evidence, a liability order application must be rejected.

Question 26: What other ways can councils support individuals when they miss a council tax payment?

It is important for taxpayers to be referred for debt advice as early as possible, because a delay in getting debt advice can have a detrimental impact on a person's mental and physical wellbeing (see the Money and Mental Health Policy Institute paper on '[Breaking the Cycle](#)'). This policy document highlights the possible saving to the public spending if mental health and money advice were better integrated. This demonstrates that early intervention may result in a council saving money because enforcement could be avoided and better engagement could result in a higher recovery rate.

Councils should be encouraged to work collaboratively with the debt advice sector and charities to create effective referral pathways when taxpayer falls behind with a single council tax payment and / or is identified as vulnerable and requiring greater support. This partnership should include the council having a dedicated team to work with the debt advice sector to quickly provide information regarding the taxpayer's liability, steps already taken to assess their liability and any reductions that have been applied to the taxpayer's account.

It should be made clear to taxpayers that the debt advice service is independent from the council and how a debt advice service can help, as this may encourage better engagement.

Liability orders

Question 27: Do you agree that the government should introduce a cap on the reasonable costs that a court can award for a council's costs for an application for a liability order?

Under regulation 34 of the Council Tax (Administration & Enforcement) Regulations 1992, a local authority is lawfully allowed to seek from the customer *"a sum of an amount equal to the costs reasonably incurred"* in connection with the liability order⁵.

The cost of an application for a liability order is just 50p per defendant that the order is sought against⁶. According to Freedom of Information request FOI-87871⁷, liability order applications are "bulk listed" before a court and heard in bulk by the court. An application for a liability order is generated by software (such as NEC Software Solutions⁸), and there is no requirement for a wet ink signature by the court. This makes an application for a liability order straightforward, with minimal human involvement beyond a local authority administrator interfacing with the software, and a Justice of the Peace rubber stamping the application.

Additionally, liability orders are issued against hundreds of thousands of people per year; in 2021/22, the Manchester City Council issued 39,000 liability orders against 243,000 eligible properties⁹. It is not realistic to assume that each one of those liability orders was manually reviewed in any great depth.

At the Manchester City Council rate of £79.50 per liability order, this suggests that in 2021/22 alone, the "reasonable costs" incurred by the local authority in the application of those liability orders was £3,100,500. Based on the automation and bulk stamping of the liability orders, this seems unrealistically high.

⁵ <https://www.legislation.gov.uk/ukxi/1992/613/regulation/34>

⁶ <https://www.legislation.gov.uk/ukxi/2008/1052/schedule/1/made>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/295878/procedure-for-liability-orders.doc

⁸ https://www.whatdotheyknow.com/request/software_for_council_liability_o#incoming-2215562

⁹ https://www.manchester.gov.uk/info/200028/council_tax/6722/council_tax_data

This lack of realism in the amount charged for a liability order compared to what costs a local authority have reasonably incurred was discussed in detail in *Nicolson v Tottenham Magistrates Court & Anor [2015]*, a judicial review case. The High Court outlined that – before making a Liability Order – a Magistrate must be satisfied that the local authority had actually incurred the costs claimed, and that those costs were reasonable. The High Court deemed that it was not sufficient to rubber stamp bulk applications and agree to any cost assessment advanced by a local authority without scrutiny¹⁰.

This suggests that the cost of a liability order and a “reasonable sum” incurred in connection with that liability order should be set at a considerably lower amount. In Wales, the cap on liability order costs is £70¹¹.

Therefore, we agree that a cap should be introduced on the cost of liability orders.

We also propose that local authorities should be accountable for the reasonable costs incurred in relation to these applications to ensure they are acting lawfully under the Council Tax (Enforcement & Administration) Regulations 1992, and that this information is available to the public without the need for a Freedom of Information request.

Question 28: What do you think this cap should be set at?

Please explain your answer:

- less than £70

We believe that the cost of a liability order is considerably lower than even the £70 proposed by the consultation. Given the number of liability orders sought each year, and the ease of the application by a local authority, the cost of a liability order should be as little as £20.

Question 29: Should the cap apply when seeking a liability order on second or empty homes?

Millions of people are denied a safe, stable home, and the country is in a housing emergency¹². According to the Action on Empty Homes charity, the combined total of empty and second homes exceeds 1,000,000 properties¹³. According to Shelter, there are over 350,000 people living in temporary accommodation or are street homeless¹⁴.

¹⁰https://england.shelter.org.uk/professional_resources/news_and_updates/council_tax_liability_orders_the_price_of_non_payment

¹¹<https://www.legislation.gov.uk/wsi/2011/528/regulation/3/made>

¹²https://england.shelter.org.uk/support_us/campaigns/what_is_the_housing_emergency

¹³<https://www.actiononemptyhomes.org/>

¹⁴https://england.shelter.org.uk/media/press_release/at_least_354000_people_homeless_in_england_today_

While local authorities should take steps to minimize the amount of debt passed to debtors where a liability order is obtained (see our answer to question 28), this should not be extended to second or empty homes.

A person with a second home or empty property may be liable for an increased amount of Council Tax due to additional premiums, which may increase the longer the home remains uninhabited¹⁵.

This increased sanction on second homes and empty homes may help local authorities supplement the reduced revenue from a decrease in the amount charged for liability orders on main properties. It can also be used to supplement a local authority's income generally, which might be used to provide homeless services or temporary accommodation, which are necessary as a direct result of the housing emergency. Moreover, the additional premiums for second or empty homes may result in these properties re-entering the housing stock sooner¹⁶.

Powers to enforce council tax

Question 30: Do you believe the current enforcement is or is not proportionate in the context of council tax collection? Why/why not?

The current enforcement powers available to a local authority include deductions from benefits, a direct earnings attachment to wages, use of enforcement agents, charging orders, petitioning for bankruptcy, or committal to prison.

Imprisonment: Although Council Tax is a "tax" debt in name, no other household debt carries the sanction of imprisonment for non-payment. Since 2019, the sanction of imprisonment has been removed from Welsh local authorities¹⁷.

There should no longer be a sanction of imprisonment for English Council Tax debts, to bring us in line with Wales.

Bankruptcy: At the Shelter Specialist Debt Advice Service (SDAS), we offer technical advice and support to front-line debt advisers across England and Wales. We have seen several instances of local authorities seeking bankruptcy petitions against debtors

¹⁵ <https://www.gov.uk/council-tax/second-homes-and-empty-properties>

¹⁶ [Response - Council Tax: Proposed Changes for Second and Long-term Empty Homes - Shelter England](#)

¹⁷ <https://www.gov.wales/written-statement-removal-sanction-imprisonment-non-payment-council-tax>

(usually homeowners) because of council tax. We believe that this method of recovery is draconian and should be used only as a very last resort.

The use of bankruptcy has been shunned by the Local Government Ombudsman^{18&19}. In these cases, the local authority was warned that bankruptcy should be a last resort, and only in exceptional circumstances, after all other options have been entirely exhausted. This might include all other options available to the local authority, including a charging order.

The ramification of bankruptcy is incredibly damaging to any taxpayer and includes the loss of their home and any other assets, as well as considerable impact to their ability to obtain credit for several years. The taxpayer is also likely to lose out on a considerable sum of money as a result, particularly if their home is sold at a reduced value by the Official Receiver, who take a cut of 15% of all asset sales²⁰. There may also be conflicts of interest where the solicitors used by the local authority to petition for bankruptcy are the same solicitors who act as trustees in bankruptcy.

Bankruptcy is not always a reliable way of recovering a sum outstanding. Depending on the other debts and the value of assets of a customer, the local authority might receive only a small portion of their debt, and the process of recovery could take years. The loss of home of the taxpayer is also likely to impose a homelessness duty on the local authority for that customer, which is likely to cost far more than any sum recovered following bankruptcy.

On this basis, we believe that bankruptcy should be considered only as a final resort for Council Tax, and misuse of bankruptcy should include severe sanctions on the local authority.

Enforcement Agents (formally known as bailiffs): Enforcement Agents have the right to visit and enter a property, can remove and sell goods to repay debts, including council tax. It's widely known that council are under significant financial pressure, and the collection of council tax is crucial for provided local services. However, councils are very quick to instruct enforcement agents to recover council tax debts, and the use of enforcement agents is detrimental in almost all cases, especially where it is considered as a first option and its use is necessary for committal proceedings. The Money Advice Trust has been publishing '[Stop the Knock](#)' reports since 2015, and these reports highlight the proliferation of enforcement agent use by councils.

One of the Money Advice Trust's '[six steps for local authorities](#)' includes a request that taxpayers in receipt of Council Tax Support, and therefore highly likely to be in a vulnerable group, should be exempt from the use of enforcement agents to recover council tax. This is an approach that SDAS supports due to the detrimental impact the

¹⁸ LGO decision: Wolverhampton City Council, 06/B/16600

¹⁹ LGO decision: Camden London Borough Council, 07/A/12661

²⁰ <https://www.legislation.gov.uk/uksi/2016/692/schedule/1>

use of Enforcement Agents has on vulnerable taxpayers. On 15 August 2025, the [Guardian](#) reported that Marstons Holdings (a company that is also instructed by councils to pursue [council tax arrears](#)), the 'biggest bailiff company' had overcharged people it was pursuing for unpaid debts by adding multiple enforcement fees (£235) to an individual's debt. This article highlights how a debt can quickly escalate following the use of enforcement agents and this is even more detrimental to taxpayers with smaller council tax debts.

Not only should taxpayers in receipt of council tax support be exempt from the use of enforcement agents, but taxpayers identified as vulnerable and those who owe less than £1,000 should also be protected. This is because the fees that can be added effectively double or triple a taxpayer's debt and therefore make it far more difficult to repay.

Local authorities should be expected to withdraw cases from enforcement agents where necessary (as outlined in the [Council Tax Collection best practice guide](#) and paragraph 16 of the [Taking Control of Goods: National Standards](#)). In our experience, local authorities are not always prepared to do this and instead insist that debtors liaise directly with enforcement agents, even though this is likely to be detrimental to the debtor. By exercising a right to withdraw a case, a local authority can give a debtor an opportunity to deal with the local authority directly.

Deductions from Earnings and Benefits: A local authority can make up to three deductions from Universal Credit, at a rate of 5% of the standard allowance (currently £400.14) each²¹. This could allow a local authority to recover up to three accounts at a time in a way that guarantees regular repayments, as the money comes directly from benefits and does not require the debtor to set up a payment plan which they might default on.

The rate of deduction from wages is considerably higher²², scaling with the earnings of the debtor. A debtor earning £500 per week after tax could face up to two deductions of £85 per week (based on a deduction rate of 17%). This allows a local authority to recover sums much more quickly and effectively than using enforcement agents.

The current legislation allows for two attachments to be made to earnings at a time²³. Although recovery of arrears is a priority, taking too much from a taxpayer's earnings can create financial hardship in other areas (such as rent or mortgage). This could inadvertently end up costing a local authority more in the long run if they must then provide other services such as homelessness prevention. There is also the risk that a taxpayer would default on their current year's council tax if the attachment of earnings reduces their income, which creates a domino effect on recovery. To combat this, we recommend that the number of attachments to earnings for recovery of Council Tax be reduced from two to one.

²¹ <https://www.gov.uk/bills-benefits>

²² <https://www.legislation.gov.uk/uksi/1992/613/schedule/4>

²³ <https://www.legislation.gov.uk/uksi/1992/613/regulation/37>

However, local authorities should also be prepared to reduce the amount deducted from earnings on a case-by-case basis, depending on the material impact this may have on a taxpayer. This may require a local authority to undertake an assessment of income and expenditure first, rather than always assuming the highest rate of deduction. This could include closer relationships with the debt advice sector (as suggested in our answer to Question 26).

If deductions from wages or benefits can be imposed in a way that isn't financially detrimental to taxpayers, this could result in a much more reliable and cost-effective way of recovering arrears compared to the use of enforcement agents or other enforcement methods.

Question 31: What are your views on ways enforcement could better reflect the needs of those in financial or other hardship?

Local authorities should undertake welfare checks (see answer to question 24) before imposing recovery action. This should include signposting to debt advice, and being prepared to place holds on accounts of vulnerable taxpayers to give them time to seek advice or apply for other support, where appropriate.

Deductions from benefits or earnings are much more reliable as enforcement methods to recover unpaid Council Tax, and these methods should be prioritised above the use of enforcement agents, provided this option does not lead to financial hardship for the taxpayer. To prevent this, local authorities should be required to assess the financial impact of such assessments before imposing them.

Question 32: What are your suggestions on alternative or additional measures to ensure council tax is paid?

Current Council Tax regulations are not always straightforward to interpret, and as a debt advice service, we regularly see taxpayers not sure of what they need to be paying and when. Greater transparency about what is owed would ensure that customers are aware of their obligations.

Although a bill (demand notice) is issued at the beginning of the year, greater transparency could be achieved through regular notices (that can be opted into or out of by taxpayers), such as via text (including WhatsApp) or email. Given the advent of mobile phones, local authorities could also offer this information through a portal (e.g. via web browser or app), as well as a way of paying their bill via said portal.

For taxpayers in receipt of certain benefits, it might be appropriate to offer a direct deduction from those benefits for ongoing payments, as well as any arrears. This would reflect the position for rent, where taxpayers can opt to have their Universal Credit paid

directly to their landlord to avoid rent arrears, or Fuel Direct, where customers can have their utility payments paid directly from their benefits for ongoing usage.

Local authorities could also offer a discount for paying in full at the beginning of a year. This would encourage payments in full, whilst giving local authorities those Council Tax funds much more quickly to help with planning and fundings the provision of services.

Broader collection powers

Question 33: What are your views on the current methods available to councils to collect council tax?

Given the rapid advance of mobile phones and how there has been a shift in how people access the internet²⁴, since the original regulations were drafted, we believe that customers should be able to access an online portal (see our answer to question 32) that gives instant access to their Council Tax balance and payment schedule.

Taxpayers should also be able to pay in several ways using a mobile phone, including by text, PayPal, or open banking. Taxpayers could also be offered the option to pay in Cryptocurrency.

For taxpayers in receipt of certain benefits, it might be appropriate to offer a direct deduction from those benefits for ongoing payments, as well as any arrears. This would reflect the position for rent, where customers can opt to have their Universal Credit paid directly to their landlord to avoid rent arrears, or Fuel Direct, where customers can have their utility payments paid directly from their benefits for ongoing usage.

Question 34: How else do you think council tax could be efficiently and fairly collected?

More regular reminders such as via text or email, to ensure that customers are aware of any outstanding amount and next date of payment.

Use of modern technology (such as a payment app or portal) will cater to a wider audience, whilst existing methods (such as Direct Debit, Post Office, and Payzone) will continue to cater to those familiar with those methods.

²⁴ [UK Mobile Phone Statistics 2025 - Stats Report - Uswitch](#)

Any other comments

Question 35: Do you have any views on anything else related to council tax administration which has not been covered in this consultation and call for evidence? If so, please provide them here (250-word limit).

As highlighted in our answers to questions 24 and 26, there must be more effective and quicker communication between council departments. A more joined up approach would be more cost effective and help to establish any vulnerable taxpayers, especially where a taxpayer is working with housing options (if they are homeless) or may already be receiving a Discretionary Housing Payment (DHP) or housing benefit (if appropriate).

Public Sector Equality Duty

Question 36: Do you have any views on whether any of the proposed changes in the consultation will have any disproportionate impacts on any particular groups with protected characteristics compared to others?

We believe that there would be no detrimental impact from greater transparency in the billing process, including information about discounts and more regular reminders. The key issue would be ensuring that this information is available in a wider range of formats and mediums, including Braille, large print, audio or video, and alternate languages.

We have seen that certain recovery methods (such as enforcement agents) can have a detrimental impact on vulnerable taxpayers, and local authorities should take further steps to assess the impact of recovery and signpost to debt advice before taking steps against vulnerable taxpayers.