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Enforcement Conduct Board
Research into Doorstep Interactions
Findings report

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Project details and acknowledgements

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M·E·L Research maintains the following certifications and accreditations.



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Introduction

About the Enforcement Conduct Board

The Enforcement Conduct Board (ECB) is the independent, non-statutory oversight body for the debt enforcement sector in England and Wales. Its mission is to ensure that everyone experiencing enforcement action is treated fairly.

Through a system of accreditation, the ECB oversees enforcement firms, and their Enforcement Agents (EAs, colloquially bailiffs) which undertake enforcement action under the Taking Control of Goods Regulations 2014.

One of the key priorities set out in the ECB's business plan for 2023-24 was to commission independent research to improve the evidence base on enforcement behaviour and conduct and to support the development of a proportionate oversight framework for enforcement firms and EAs - including the creation of new Standards for enforcement to ensure that those who experience enforcement are treated fairly.

This report covers the first product of that research priority: independent research into Body Worn Video (BWV) footage of interactions between certificated civil EAs and members of the public who are subject to enforcement, to give the ECB a clearer picture of what is really happening during the enforcement process on the doorstep.

This research

Following an open competition, the ECB selected M·E·L Research (M·E·L), an independent social research agency to conduct the research project.

The ECB asked M·E·L randomly to select and review BWV enforcement footage taken by civil EAs certificated by the County Court who work for a range of firms accredited to the ECB. This meant that the research would focus on the enforcement of significant and high-volume debts, including council tax arrears, non-domestic rates, parking fines, and penalties issued by authorities including Transport for London and National Highways.

This BWV review took place in a series of visits to accredited firms undertaken between June and September 2024.

By systematically analysing real-world footage, this first-of-its-kind project aimed to fill the ECB's evidence gap, offering it the reliable data necessary to develop informed and targeted policy interventions to help achieve its mission of improving fairness in enforcement.

Executive Summary

Researchers from M·E·L Research reviewed 935 videos of visits conducted by Enforcement Agents (EAs) of accredited firms, including 648 in which an interaction occurred with either the named individual facing enforcement action or a third party.

Researchers undertook a number of training and familiarisation sessions prior to entering the field and reviewed videos against a framework agreed by an expert group and based on the existing National Standards (Standards) 2014.¹

ECB accredited firms selected to participate were asked to provide a full list of eligible visits conducted after the 1st of March, from which videos were randomly selected.

Videos were viewed in a controlled environment, without the presence of members of firm staff.

The research found that 94% of visits complied with all of the National Standards. However, a breach of at least one of the Standards occurred in 6% of visits which included an interaction.

Breaches tended to be concentrated in certain areas of the Standards, most commonly:

- breaching the privacy of the individual facing enforcement action (including being found in non-compliance with GDPR);
- a lack of acknowledgment of vulnerabilities;
- conducting enforcement outside of appropriate hours;
- acting in a way which was deemed likely to be publicly embarrassing to the individual facing enforcement action.

There were also a number of instances identified in which:

- agents were judged to have misrepresented their powers;
- agents threatened the removal of ineligible household goods.

While these occurred less frequently, these can be significantly more stressful and concerning for individuals experiencing enforcement.

In addition, there were seven instances where a video was paused or turned off prematurely during the enforcement action without apparent reason. These seven cases have not been included in the

¹ The National Standards represent a non-legally-binding framework and are intended for use by all enforcement agents, public and private, the enforcement agencies that employ them and the major creditors who use their services. The Standards are available here: <https://www.gov.uk/government/publications/bailiffs-and-enforcement-agents-national-standards>

number of visits deemed to breach the Standards as ending a video is not in itself a breach; however it is important to acknowledge their presence within the sample when considering the figures for the total number of videos in which a breach was observed

It is also important to note that as well as recording areas in which the Standards were breached, instances of good practice were observed throughout the research, particularly when it came to entering properties and handing out receipts, and in the majority of instances where an EA encountered someone the research team felt could be considered vulnerable, they acted appropriately. The majority of interactions viewed by the research team were of EAs abiding by the Standards and undertaking a difficult job with professionalism and consideration.

It was also noted that in 1% of visits, the individual facing enforcement themselves was observed being aggressive, physically or verbally, to the EA.

Background to the Research

The ECB was set up in 2021 following a Centre for Social Justice Report, *Taking Control for Good*, and as a result of a collaboration between the civil enforcement industry and leading debt advice charities including Money Advice Trust, Christians Against Poverty and StepChange.²

EAs, previously known as bailiffs, play a crucial role in the economy and upholding the rule of law by enforcing the recovery of debts owed to both public bodies and private companies. However, the ECB was created in response to growing concerns about the behaviour of some EAs, particularly in light of the economic pressures brought on by the cost-of-living crisis.

This research project is of significant national importance. Through the review and analysis of BWV footage, it aims to assess the behaviours and practices of EAs during their doorstep interactions, with a focus on their conduct while collecting civil debts such as council tax arrears, non-domestic rates, parking fines, and penalties issued by authorities like Transport for London and National Highways.

The enforcement process must be undertaken in line with Regulations introduced by the Ministry of Justice (MoJ) in 2014. MoJ has also published National Standards which set out further detail on how enforcement action should be conducted. These Standards are advisory but do not have legal force, although it is a condition of the accreditation of an enforcement company with the ECB that a firm will comply with the Standards.

EAs typically attempt to collect outstanding debts through a structured process, starting with a written request for payment, referred to as the Compliance Stage. Should this stage fail, agents proceed to the Enforcement Stage, which involves visiting the individual or business's property.

An EA may visit a property once or continue to visit until the debt has been paid or a repayment plan reached (to pay the debt in smaller instalments). In some cases, payment is not possible, and the debt may be returned to the creditor, such as when the clear vulnerability of a person makes them unsuitable for enforcement action.

Although the use of BWVs is not yet legally mandated, it is estimated that approximately 95% of EAs voluntarily use this technology to document their interactions, a practice expected to become mandatory in the near future.

² <https://www.centreforsocialjustice.org.uk/wp-content/uploads/2021/07/CSJJ9052-Taking-Control-For-Good-INT-210720-WEB.pdf>

Methodology

Overview

M·E·L Research Ltd, an independent social research agency and Company Partner of the Market Research Society, was appointed by the ECB to lead an evidence-gathering initiative aimed at objectively understanding the experience of individuals experiencing enforcement actions during doorstep interactions.

M·E·L Research undertook a detailed review of BWV footage from a range of enforcement visits across a range of firms accredited to the ECB of different sizes and with different levels of resourcing.

Footage assessed by M·E·L:

- were carried out during visits to firms between June and September 2024;
- involved cases which related to certificated civil EAs. This approach was chosen due to civil enforcement being the most common enforcement type within the UK, thus allowing for a holistic view of a large part of the enforcement industry.

Feedback was captured for all videos viewed, although this report focuses on the videos that included a face-to-face interaction, either with the person experiencing enforcement, with a household member, or in some cases other members of the public/business employees.

The footage was evaluated against a robust set of criteria based on existing Standards and developed with input from experts across the ECB, debt advice sector, and enforcement industry.³

A core team of researchers undertook all visits, and each member of the team attended training and advisory sessions run by the ECB, with input from both the enforcement industry and the debt advice sector to ensure that all researchers understood the detail of the Standards and how they should be implemented. The team also reviewed a number of videos as a group prior to undertaking any independent visits, and all feedback included qualitative details which were moderated by the wider team during analysis. To monitor consistency, a number of visits were also reviewed double-blind, meaning that two researchers reviewed the same visit video and provided their feedback independently of one another. These visits are only counted once in the findings.

Video review was undertaken in closed rooms without the presence of any firm staff, so that employees working at the firms could not influence or bias the researcher in anyway. Visits to be reviewed were selected randomly, allowing the researchers to view as representative as possible

³ <https://www.gov.uk/government/publications/bailiffs-and-enforcement-agents-national-standards>

sample of the enforcement visits across the country and to remove the potential for firms to hand pick visits viewed.

It is the view of M·E·L Research that the findings form a solid foundation for the ECB's oversight and regulatory framework and represent an objective view of the situation on the ground vis-à-vis door step interactions between EAs and those experiencing enforcement action.

Detailed Approach

Selecting the firms

M·E·L approached a range of accredited enforcement firms to take part in the research, drawn from the register of accredited enforcement firms who undertake relevant work in civil enforcement.⁴

Firms were organised across three tiers – Tier 1 to Tier 3 – based on turnover related to enforcement activity. Firms were selected to take part in the research from across each of these tiers, to ensure that a range of different sizes of firms were included. This was to ensure different processes and resourcing levels, such as specialist training staff, specialist auditing staff, in some firms were captured and that the visits viewed were representative of the market.

The research team viewed more videos from Tier 1 than from other tiers, due to the high proportion of enforcement visits nationally undertaken by firms from this Tier. More firms were visited in Tier 3 than Tier 2, due to the greater number of enforcement firms existing in this Tier.

The number of completed videos fell into the following tiers:

	Number of videos viewed containing contact viewed	Number of videos viewed not containing contact	Total videos viewed
Tier 1	323	93	416
Tier 2	107	108	215
Tier 3	218	86	304
Total	648	287	935

These firms were spread across England and Wales, covering a broad range of geographies in terms of both head office locations and visits undertaken.

Together, the firms visited represented a significant market share of the civil enforcement business in England and Wales.

⁴ <https://enforcementconductboard.org/directory/>

Privacy & Data Protection

In advance of visits, firms were asked to amend their Privacy Statements to indicate that footage captured on BWVs may be used for research purposes. A pro-forma privacy statement was provided to firms to make this process as straight forward as possible.

As a result, only videos of interactions taking place after the date in which the Privacy Statement came into effect, the 1st of March 2024, were included in the research.

Firms were also provided with a Data Sharing Agreement which was signed by representatives of the firm, the ECB and M·E·L Research. This provided an outline of the protocols for visits on the day, including provision for firms to require researchers to hand-over mobile devices or to secure them in other ways, such as leaving them in a car. As per this agreement, no personally identifiable data about EAs or individuals captured on BWV was recorded as part of the study.

All members of the research team submitted to Enhanced Disclosure and Barring Service checks prior to undertaking any research on-site.

Measures for evaluating visits and interactions

A framework was designed that was to be used by researchers when reviewing each video.⁵ The different areas of the framework were framed as questions informed by National Standards for Taking Control of Goods, and the relevant Standard wording was also provided with each question – providing both ‘plain English’ and formal wording for the researcher to consider. Whilst the Standards are non-statutory guidance, it is a condition of accreditation to the ECB that firms agree to follow them, and thus these Standards represent a ‘bar’ which all firms included in this research should be aiming to meet as a minimum.

In addition to measures around the Standards, we also included questions to capture any good practice, as well as to capture the experience of EAs.

Questions required a yes/no response as to whether an event/issue had or had not occurred for each measure and, where relevant, further detail was provided via qualitative comments. These qualitative comments were used in the moderation process to ensure all researchers were making judgments in a similar way. They also served as examples of how specific breaches of the Standards manifest. However, as noted above, no personally identifiable information was captured within these narrative sections.

⁵ The complete framework utilised is provided in the appendix.

The measures were designed collaboratively by the ECB and M·E·L Research and then reviewed and agreed by an expert group.

Training the researchers

A core team of six researchers was selected to conduct the assessment. All videos were reviewed by members of this core team to ensure consistency across the study. All researchers undertook video reviews at multiple firms. The research team comprised researchers who were only fluent in English, therefore the scope of the research did not include videos conducted in any other language. Where a video, or part of a video was conducted in another language, the video was to be marked up to indicate that it could not be analysed in its entirety.

Each researcher was fully briefed on the requirements and provided with briefing notes written by the ECB and M·E·L Research.

All of the researchers attended face to face training sessions held by the ECB. The purpose of the training was to help the researchers to better understand the Standards (and what constitutes a breach of these), the powers of an EA and the enforcement process, as well as to have the opportunity to review a number of example BWVs in the same or similar formats (e.g. same video platforms) as those to be viewed in the main fieldwork. This training was supported by CDER Group, who provided the venue and example BWVs to review.

In addition to these training sessions, the research team also had the opportunity to engage with, and ask questions of, experienced professionals from CEDR Group, CIVEA and from the Money Advice Trust.

Contact with the firms

In general, although enthusiastic about the research, some firms were relatively slow to get involved. However, this was mainly due to concerns about the lack of resources to set up and facilitate the visits, GDPR concerns – with some needing assurance from the ECB about the strict anonymity of the data and that it was not necessary directly to inform individuals who may have been filmed during the enforcement process – and on the focus of the research itself, with one firm feeling that this was somewhat geared towards highlighting negative interactions.

The vast majority of communications with firms were undertaken independently by M·E·L Research, however where necessary, specific concerns were addressed by the ECB.

Concerns about lack of resources were heightened amongst the smaller firms. However, following one to one Microsoft Teams or telephone conversations with M·E·L Research, firms felt more confident that the process would not be too onerous and were happy to be involved. Firms understood the need for the research and were generally assured of the integrity of the process.

Random selection of body worn video

The process for selecting the videos to watch was agreed by the ECB having taken on board some suggestions from an expert group and is outlined below. Where relevant this was tailored slightly to suit the specific situation of individual firms. However, each tailored process still maintained the key focus on the randomisation of selected videos.

The process agreed with all firms maintained the following principles:

1. The firm supplied a list of all applicable visits. All cases included in the list were conducted post issuance of the updated Privacy Policies
2. M·E·L identified a random sample and advised the firm of the selected BWVs
3. The firm downloaded the selected videos to a local hard drive for M·E·L to view in a clean room
4. M·E·L validated that the videos they reviewed are the selected BWVs and undertook analysis

In some instances, instead of videos being downloaded to a local hard-drive, videos were provided via a secure login on the firms' video management system.

Firms were asked to provide the length of videos if this was available. Where possible, videos were viewed which were over 3 minutes in length to maximise the potential for a doorstep interaction (the focus of this study). Randomisation was undertaken multiple times if required in order to ensure that videos being viewed were selected by M·E·L Research and not by firms.

Finally, some firms were able to identify in advance whether or not videos were of visits which included contact being made with the individual experiencing enforcement, with a third party or whether no contact was made. Given the focus of this study, in these instances, it was agreed that the random sample would focus on these videos, although checks were undertaken to ensure visits identified as being non-contact were correctly identified as so.

Evidence Base

As outlined above, the total number of visits reviewed was as follows:

	Number of videos viewed containing contact viewed	Number of videos viewed not containing contact	Total videos viewed
Tier 1	323	93	416
Tier 2	107	108	215
Tier 3	218	86	304
Total	648	287	935

These visits were made across a total of twelve firms and includes visits which both did and did not result in contact being made with the individual experiencing enforcement action or a third party.

This included:

- 24 instances where a video selected by our team was paused or turned off prematurely during the course of the enforcement. Most of these were stopped for a reason that could be determined based on the footage available, such as the person being enforced against asking for the video to be halted. However, in seven cases, there was no clear reason for the video to be stopped or paused. Ending a video is not in breach of the National Standards so these visits have not been marked up as such. However it is important to acknowledge the presence of these videos within the sample when considering the figures for the total number of videos in which a breach was observed. We have provided a breakdown of these visits in Appendix 2.
- 34 instances where a video or audio was unable to be seen or heard for at least part of the interaction, due to reasons such as background noise or the camera picture being distorted. On two visits, part of the interaction took place in English, and part in another language. In these cases, analysis was conducted on the part of the visit that was conducted in English only.

In addition, it is important to note that videos of visits which were usable within the study fell into three broad categories:

- Videos with a full visit captured from start to finish
- Videos which included part of a visit, but were clearly not the entire visit, and where we were unable to identify a video which detailed the remainder of the visit
- Instances where we were able to view multiple videos to see a complete visit

The vast majority of the videos we viewed included a complete visit. Where a partial visit was viewed and we were not able to identify a related video to view the remainder of the visit, this was due to the approach of randomly selecting videos and asking firms to pre-download them ready for viewing in the closed room described above.

Assessment of Video Selection and Representation

M·E·L Research is confident that the videos we reviewed were selected in a manner that can be considered both random and representative of the available BWV footage at the firms in this study and within the parameters set. The selection process was conducted by our team, and the visit videos were chosen using random selection, ensuring that the sample reflected a fair cross-section of the footage.

Several key points underscore our assessment:

- **Random Selection Process:** All videos were randomly selected by M·E·L Research, independent of influence from the firms involved.
- **Volume and Time Constraints:** The sheer volume of video content requested across firms was substantial, and to comprehensively review all footage would require significant staff time. The time between selecting videos for viewing and actual viewing was, in most cases, relatively short. To be clear, firms were asked to make available significantly more videos than were actually viewed.
- **Commitment to Research:** Through direct discussions with senior staff members within firms, it became apparent that, by and large, there was a genuine commitment to support the research. We acknowledge the possibility of disingenuity, but as experienced researchers used to speaking to a wide range of people, our interactions did not raise any such concerns.
- **Full Database Access:** In a number of instances, firms provided unrestricted access to their entire video databases, allowing us the option to review videos outside of our pre-selected sample. This openness suggests a level of transparency, reinforcing the notion that these firms had 'nothing to hide.' However, we remained committed to our randomised selection to maintain the integrity of the review. It is also the case that the way some firms catalogue and index videos did not always help us to easily determine that we had a full list of their videos. We understand that the ECB is looking at ways to establish this.

- **Diversity of Firms:** The footage sampled was drawn from a diverse range of firms across different sizes and sectors, providing a broad cross-section of operational contexts. This helped to ensure that the findings were not skewed by a particular type of firm or environment.
- **Review period:** The review covered footage spanning a wide observation period, which helped to ensure that the sample reflected regular, day-to-day operations rather than being influenced by any specific event or short-term anomaly.
- **Moderation & Review:** All video analyses were reviewed by multiple researchers, ensuring that any potential for individual bias was mitigated through consistency checks and collective analysis. A proportion (5%) of videos were also watched by two researchers, spread across firms.
- **Video length:** The videos reviewed varied widely in length, ranging from brief interactions to more extended footage. This ensured that a full range of operational contexts, from routine to more complex situations, was captured, providing a comprehensive view of the firm's activities. The range in video lengths reflects the operational realities of the firms, where interactions vary naturally in duration. This diversity of footage adds to the authenticity of the sample, making the review more reflective of real-world conditions

Findings

This document is based on the results of 648 visits where contact was made with the individual named as part of the enforcement or with a third party.

Enforcement Agent actions flagged

Of the 648 visits viewed, 40 have been flagged as breaching the Standards, equating to 6% of the viewed visits. Most videos included only one breach, however 9 contained 2 or 3 breaches, bringing the total number of breaches to 50.

The incidence of breaches across all areas of the Standards are outlined below:

Acknowledging vulnerability

A noticeable area in which the Standards are least commonly met is in acknowledging and taking into account self-identified or obvious vulnerability, which occurred in eight videos observed.

No cases were observed in which the enforcement continued after the individual experiencing enforcement action stated that they were in Breathing Space or an Individual Voluntary Arrangement (IVA).

Standard	Number of breaches viewed	% of videos containing a breach
Failure to acknowledge a self-identified or obvious vulnerability and/or to provide any indication of how this might be proven or taken into account.	8	1%
Cannot continue enforcing debt, when an individual states they are in Breathing Space and providing a reference number. The Government's Breathing Space scheme allows an individual temporary protection (60 days) from most types of debt collection including enforcement. When an individual is in or in the process of one of these solutions the EA should not continue to collect the debt when the individual can provide a reference number or letter proving this. EAs must at the very least stop the enforcement process and check with originating creditor to confirm debt they are enforcing is included in the solution and therefore cannot be enforced.	0	0%
Cannot continue enforcing debt when an individual states they are in a DRO, in the process of bankruptcy, declared bankrupt or in an IVA and provide supporting documentation Solutions such as a Debt Relief Order (DRO), bankruptcy and Individual Voluntary Arrangements (IVA) are legal processes via The Insolvency Service. When an individual is in or in the process of one of these solutions the EA should not continue to collect the debt when the individual can provide supporting documentation. EAs must at the very least stop the enforcement process and check with originating creditor to confirm debt they are enforcing is included in the solution and therefore cannot be enforced.	0	0%

Examples of failure to acknowledge vulnerability:

The door of the home of the individual facing enforcement action is opened by another resident of the property. The other resident explains to the EA that the individual facing enforcement action is currently in hospital, and would not be out for another week. The EA continues with the enforcement action regardless, stating that the amount due would increase further if it was not paid that day, despite the individual facing enforcement not being present, and being unwell in hospital.

When explaining the nature of the debt to the individual facing enforcement action, the individual (who presents as an older female) reveals that she has been widowed and left with large volumes of debt by her late husband, and is unable to pay anything. The individual facing enforcement action is clearly in emotional distress and is in a state of shock about her situation, staring blankly at the EA for periods, as if shell-shocked. The EA himself initially appears to be unsure how to proceed. However, he subsequently attempts to proceed with the enforcement, not helping to signpost the individual to any available support that she could access, and instead making comments such as “You’re still able to buy fish and chips though” and failing to acknowledge clear vulnerability.

After the EA explains why they are present and the nature of the debt they are enforcing, the individual facing enforcement action explains that she has depression and has been signed off work for a year, and is living in her home under police protection, having previously been homeless. Additionally her phone is broken so she is unable to receive a payment link. She is visibly distressed throughout the interaction and her appearance is visibly unkempt. The EA doesn’t acknowledge her vulnerability or signpost to any support, and instead continues to push her to set up a payment arrangement.

Approaching and entering property of the individuals facing enforcement action

In this area, two types of breach were observed. On five occasions, the EA conducted the enforcement outside of the hours of 6am to 9pm. All but one of these occurred before 6am, with the earliest being conducted at 5.25am.

There was no indication the agent had a court warrant to permit this in any case, nor that they were commercial properties.

On a further three occasions, EAs were observed misrepresenting their powers, qualifications, capacities, experience or abilities, by overstating the consequences of not making a payment on the date of their visit, or in the future.

Standard	Number of breaches viewed	% of videos containing a breach
Cannot enter a property to take control of goods outside the hours of 6am to 9pm.	5	1%
Cannot gain entry by non-peaceful means, including pushing past a person, jamming a foot in the door or asking to use the toilet. The reason for entry should be clear at all times.	0	0%
Cannot force initial entry to a residential property, or claim the right to do so.	0	0%
Cannot tell the individual that it is an offence to let them into the property.	0	0%
Cannot refuse to prove their identity if asked by the individual.	0	0%
Cannot be deceitful by misrepresenting their powers, qualifications, capacities, experience or abilities. An individual can in theory be committed to prison for 90 days for not paying council tax, however this is a last resort and only occurs after ignoring multiple court warnings and a court deciding the person wilfully refused to pay or was culpable. It requires a local authority to apply to magistrates for a Warrant of Committal, which an EA (not CEAs) acting as a warrant officer can then execute, but this is a process which can take weeks or months. An EA can tell an individual factually that this process may be started by the council if they do not pay. This process only applies in England, not Wales.	3	*%

Examples of misrepresenting powers, qualifications, capacities, experience or abilities.

The EA arrives at the home of the individual facing enforcement action and is greeted on the driveway. The EA explains that he is in attendance to enforce a fine. The person experiencing enforcement asks the EA to explain who he is, and the EA gives the name of the firm he is visiting from, however the individual facing enforcement does not recognise this and remains confused as to who he is. The EA tells the individual facing enforcement that he has ten minutes to make a payment or he will seize his car. The person experiencing enforcement tries to ask the EA again why he is there. The EA explains again, and the individual facing enforcement protests against this. The EA tells the individual that: "Obstruction of an enforcement agent is 52 weeks imprisonment, if you get in my way at any point I will call the police and you will go to prison."

The EA provides a detailed explanation of how the debt was incurred and how it got to the point of enforcement to help the person experiencing enforcement avoid similar situations in the future. In doing so, he states that he can "track and trace you through your phone". Likewise, after sending the payment link, the EA says "I'm connected to all the banks in the country so I can see your movements", when explaining that the enforcement firm will be able to see that the fine has been paid, and will stop sending EAs to chase it as a result. Arguably this is clumsy wording rather than an overt attempt to mislead the person experiencing enforcement, however, the statement is factually incorrect, misleading and potentially a cause for concern for a person experiencing enforcement.

The enforcement action is being taken on a business debt incurred by a café. When explaining the debt to the manager responsible for it, the EA states that "it [the debt] needs to be cleared today otherwise the doors [to the business] will be closing in the next fifteen minutes", thus suggesting that without an immediate resolution to the debt, the EA has the power to shut down the business and prevent it from operating. The EA makes no attempt to enforce the debt through the securing of goods on the property before suggesting this course of action.

Acting in a way that is publicly embarrassing or breaches the privacy of individuals facing enforcement action

One of the most common areas in which breaches occur is in ensuring that individuals facing enforcement aren't publicly embarrassed, or have their privacy breached, during the process of enforcement.

Six videos observed included actions which were likely to be publicly embarrassing to the person being enforced against, and eighteen involved breaches of their privacy.

Breaches of GDPR legislation took three forms: revealing the detailed nature of the enforcement to a person from outside of the household of the individual facing enforcement action, leaving letters in a location where they could be easily obtained from outside of the household, and the capturing of payment information such as credit or debit card numbers on the BWV.

Standard	Number of breaches viewed	% of videos containing a breach
Cannot act in a way that is likely to be publicly embarrassing to the person being enforced against.	6	1%
Cannot breach privacy, through breaches of GDPR legislation, for example, disclosing personal information about other individuals experiencing enforcement action to anyone who lives outside the property.	18	3%

Example of an enforcement action likely to cause embarrassment to the individual facing enforcement action:

An EA knocks on the door of the property listed as the residence of the individual facing enforcement action. The person who answers the door states that he is not the individual in question, but that the individual lives in the flat upstairs, thus the person who answered the door is his neighbour, and later also revealed to be his landlord. The landlord invites the EA into his home while he fetches documentation to demonstrate that the individual facing enforcement does not live at his address. While he is collecting this information, the EA and the neighbour speak at length about many aspects of the individual facing enforcement's life, including the nature of his debt. He later calls the individual facing enforcement action in front of his landlord to again explain the nature of the debt and that his car will be removed if he does not pay what is owed.

Examples of enforcement action that breaches privacy:

An EA is seeking out a business owner to carry out enforcement action, and is unable to find the address of the business in question. In an attempt to find it, he enters an alternative business with a different address and asks for directions. The employee in the business he enters says that the owner of the business which is experiencing the enforcement action also owns the business she works for, and she can pass on a letter to him on the EA's behalf. The EA hands her the letter containing details of enforcement without checking her name or validating in any way that she knows the business owner, or that the businesses are connected, and there is nothing beyond the word of the employee to suggest that the businesses are linked, and that the letter will be passed on.

In the process of taking payment, the EA, who had on multiple occasions noted on camera that the video was rolling so is actively aware that this is the case, holds both the front and rear of the debit card up to the camera whilst taking card payment. The number is clearly visible on the video when paused. The individual facing enforcement action also provides the name on the card. The card details including number and expiry date are also read out on the video in combination by the EA and the individual facing enforcement action.

Removal of goods

In a very small number of videos watched, breaches were observed in the manner in which goods were to be removed. All of these instances related to discussion about, or threats of the removal goods, rather than the actual action of them being taken.

These included visits in which the EA threatened to remove microwaves or a sofa, by writing them on a Controlled Goods Arrangement, or by asking about the make and model of a mobile phone during a discussion about removal of goods, taken as an implicit threat that it could be removed from the home. It also included a case in which the individual facing enforcement action was a former tenant, and the EA threatened to remove goods belonging to new tenants, who resided at the property in question, and which the individual facing enforcement action did not reside at.

Standard	Number of breaches viewed	% of videos containing a breach
Cannot remove anything clearly identifiable as an item belonging to, or for the exclusive use of a child (person under the age of 16) or items clearly identifiable as required for the care and treatment of the disabled, elderly and seriously ill.	0	0%
Cannot take control or remove goods clearly belonging solely to a third-party not responsible for the debt, e.g. where they have produced a receipt or other evidence.	1	*%
Cannot take control of, remove, or threaten to remove any items or equipment (for example, tools, books, telephones, computer equipment and vehicles) which are necessary and for use personally by the individual experiencing enforcement action in their employment, business, trade, profession, study or education.	0	0%
Cannot take control of, remove, or threaten to remove any clothes, beds, bedding, furniture, household equipment, items and provisions as are reasonably required for basic needs of the individual experiencing enforcement action and every member of their household.	3	*%
Cannot take control of, remove, or threaten to remove any essential items such as a cooker or microwave, fridge, washing machine, dining table and dining chairs.	3	*%
Cannot take control of, remove, or threaten to remove a landline or mobile phone.	1	*%
Cannot take control of, remove, or threaten to remove sufficient lighting or heating facilities.	0	0%
Cannot take control of, remove, or threaten to remove medical equipment.	0	0%
Cannot take control of, remove, or threaten to remove items needed for the care of a child or elderly person.	0	0%
Cannot take control of, remove, or threaten to remove security or safety equipment such as a CCTV system.	0	0%
Cannot take control of, remove, or threaten to remove pets.	0	0%

Cannot take control of, remove, or threaten to remove any item that the individual experiencing enforcement action can prove belongs to someone else.	1	*%
Cannot take control of, remove, or threaten to remove a vehicle of value £1,350 or less that can be clearly evidenced (such as through insurance) as a tool of the trade (which is vital for operating a business and is solely used for business purposes?	0	0%

Example of enforcement action in which an EA takes control of, removes, or threatens to remove clothes, bedding, furniture, household equipment, items and provisions as are reasonably required for basic needs of the individual experiencing enforcement action and every member of their household:

An EA discusses with the individual facing enforcement how he could pay the debt that is currently outstanding. The individual facing enforcement explains that he does not have the money to cover the total debt amount and can only pay part of it. The EA explains that if the individual facing enforcement isn't able to set up a reasonable payment plan, that his furniture could be sold at auction to cover the outstanding amount.

Example of enforcement action in which an EA takes control of, remove, or threaten to remove a landline or mobile phone.

When completing a control of goods form with an individual facing enforcement to list items in a property that could be removed from the home if a payment agreement was broken, an EA asks a number of questions about the make, type, and colour of the debtor's mobile phone, implying to the individual facing enforcement it will be included on the control of goods agreement. This was deemed to be a threat to remove the mobile phone. There is no evidence of a landline phone being in place in the property for the individual to use if their mobile was removed, nor does the EA attempt to ascertain whether this is the case.

Acting in a discriminatory or aggressive manner towards the individual facing enforcement action

No instances were observed in which EAs discriminated against the individual facing enforcement action on any grounds. However, one video contained an instance in which the behaviour by the EA was deemed to be clearly threatening and unacceptable by the research team.

Standard	Number of breaches viewed	% of videos containing a breach
Cannot discriminate on any grounds including those of age, disability, ethnicity, gender, race, religion or sexual orientation.	0	0%
Cannot act in a threatening manner when visiting the person being enforced against by making gestures or taking actions which could reasonably be construed as suggesting harm or risk of harm to the individual, their families, appointed third parties or property. Did the EA act in a threatening manner against the person being enforced against at any point, for example by making gestures or taking actions which could reasonably be construed as suggesting harm or risk of harm to the individual, their families, appointed third parties or property.	1	*%

Example of enforcement action in which an EA acts in a threatening manner when visiting the person being enforced against by making gestures or taking actions which could reasonably be construed as suggesting harm or risk of harm to the individual, their families, appointed third parties or property:

When explaining the reason for enforcement action and how the debt has been incurred, the EA explains to the individual facing enforcement the consequences of not paying the debt. The individual facing enforcement presents as a young woman and is accompanied by her mother. They present as being of Muslim faith/heritage due to a head covering. In explaining, he outlines the importance of paying off the debt today, stating that if the debt isn't paid, in the future another EA could attend, who could "walk in and disrespect you." This is repeated. This implication was deemed to be threatening.

Conducting enforcement in the presence of children

In the course of the research, no videos were watched in which the enforcement continued in the presence of children without a person aged 16 or older present. We did not view any videos where the only person present appeared to be under 12 years of age.

Standard	Number of breaches viewed	% of videos containing a breach
Must withdraw without making enquiries if the only persons present appear to be under the age of 12.	0	0%
Cannot conduct enforcement if the only person present appears to be under the age of 16.	0	0%
Cannot ask a child under the age of 12 when their parent would be home, in the absence of an adult over the age of 16 in the building.	0	0%

Areas of good practice

Good practice demonstrated by the EA was also recorded in addition to collecting data on behaviour and actions by EAs in which Standards were breached. Many of these instances evidenced an empathetic approach to enforcement taken by a number of EAs, which was cognisant of the potential vulnerabilities experienced by individuals facing enforcement action, their stress and anxiety, and the difficulties and embarrassment that enforcement action could cause them.

In all videos observed in which an EA entered a property, this was deemed to have been done so peacefully and through a usual mode of entry, with the reason for entry made clear – and thus within the definitions provided in the National Standards. Following all payments that were taken by cash, card or bank transfer, a receipt was provided. This does not include payments made online via online payment link as it is not possible to ascertain from the videos whether an automated receipt was sent in these cases – it has been assumed in all cases that this occurred.

However, there were some gaps in good practice when it came to supporting vulnerability. For example, only 91% of those who encountered an individual who the research team reasonably considered to be vulnerable supported them – for example by allowing them to seek debt advice or referring them back to the client via a welfare team. Most (93%) withdrew and allowed the individual time to submit supporting evidence of their vulnerability.

Behaviour	% of relevant videos in which behaviour displayed
Providing a receipt following taking of payment by cash, card or bank transfer.	100%
Support an individual who they may consider to be vulnerable, including allowing them to seek debt advice or referring them back to the client via a welfare team.	91%
Withdraw when an individual claimed to be vulnerable, and allow them time to submit evidence to support this.	93%
Gain peaceful entry to a property through a usual mode of entry. This can include an unlocked door, and they do not need to be invited in.	100%
Make clear reason for entry.	100%

In addition to the above instances of good practice that were observed in the footage, some videos also included examples of individuals expressing thanks, or gratitude to EAs for helping them to deal with the debts they were facing.

Example of an enforcement action in which the support and empathy provided by the EA reduces the level of anxiety experienced by the person facing enforcement, and changes their perception of the process:

The individual facing enforcement has multiple debts. In the course of the interaction, he explains that, having recently lost his home and being unemployed at the time of the visit, he feels overwhelmed and believes he will never be able to clear his financial obligations. His anxiety has led him to avoid engaging with the situation, ignoring correspondence from collection agencies and allowing his debts to accumulate further.

The EA takes the time to listen to the individual's concerns. Upon learning that he would soon begin a new job, the agent works with him to establish a payment plan that will commence after his employment begins. Additionally, the agent offers reassurance by providing advice, demonstrating empathy, and extending the opportunity for the individual to contact him further if needed.

This understanding and supportive approach helps alleviate the individual's anxiety, enabling him to feel more in control of his financial situation. The individual later expresses his relief, stating, "If everyone was like this, it would be different." He emphasises that had he known it could be so manageable, he would not have avoided addressing his debts for so long.

Actions of individuals facing enforcement against EAs

Incidents of aggressive, discriminatory, or threatening actions by individuals facing enforcement against the EA were also recorded.

Most common were acts of aggression directed towards the EA, including physical/and or verbal aggression. Behaviours observed included threats to stab EAs, threats to set dogs on agents, shouting, pushing, swearing and slamming doors towards EAs.

Behaviour	Number of incidences viewed	% of videos containing an incidence
Acts of aggression directed towards the EA, including physical aggression such as pushing and shoving or verbal abuse.	9	1%
Threatening to cause harm or injury to the EA or their family.	6	1%
Discrimination against the EA on any grounds including those of age, disability, ethnicity, gender, race, religion or sexual orientation.	1	*%

Considerations for findings and future research

Expand the Scope to Include High Court Enforcement: The scope of the current research focused on civil enforcement, excluding interactions related to cases passed down by the High Court. To gain a more complete understanding of the enforcement industry, it would be beneficial to extend future research to include High Court enforcement cases. This would provide deeper insights into whether there are differences in practices and behaviours across enforcement types and could illuminate additional areas for improvement in industry Standards.

Facilitating Participation from Smaller Enforcement Firms: The current research highlighted challenges faced by smaller enforcement firms in participating, including logistical difficulties in allowing site visits for video analysis and the limited number of available videos. To enhance inclusivity, future projects could provide greater lead time to smaller firms, helping them prepare for participation. In addition, alternative methods of data collection, such as remote video submission or using digital tools to securely share footage, could be explored to make the process less burdensome for smaller firms. Although there are considerations around privacy and an on-site approach may still be the most appropriate.

Benefits of On-Site Training and Interaction with the Expert Group: The training sessions and meetings with experts played a critical role in preparing the research team for reviewing body-worn camera footage and interacting with firms. Early exposure to a selection of videos, combined with feedback from EAs about their experiences and the technical aspects of the systems used, significantly enhances the team's preparedness. The sessions allowed researchers to better understand the context of what they will observe, helping them identify relevant behaviours and Standards breaches more accurately.

Additionally, receiving this feedback prior to site visits equips the team to navigate the complexities of different systems and video formats used by firms. This preparation not only improves the team's ability to assess footage but also facilitates smoother, more efficient collaboration with firms during the research process.

Advantages of a Small Research Team: The use of a small, focused research team has clear benefits in ensuring consistency, particularly when viewing large amounts of footage. A smaller team is more likely to develop a deep understanding of the research methodology, apply consistent judgment, and reduce the variability that can come with too many researchers.

Consider More Granular Analysis of Non-Compliance: The research revealed a spectrum of behaviours, from minor infractions to serious breaches of Standards. Future research could benefit from categorising these behaviours more granularly, identifying specific areas where EAs may require additional guidance or training. This approach could better inform targeted recommendations for improving enforcement practices across the board.

Address the Challenges of Reviewing Large Volumes of Video Footage: Given the substantial volume of footage reviewed, future projects may need to allocate even more time or resources for thorough analysis.

Enhance Stakeholder Communication and Engagement: Open communication with firms, especially smaller ones, should be a priority to ensure smooth participation in the research programme. Establishing a more formal engagement process—such as informational webinars or briefings before the research begins—could clarify expectations, reduce logistical challenges, and foster a more collaborative environment.

Explore Cross-Industry Comparisons: To understand how enforcement practices compare across sectors, future research could expand to examine enforcement in other industries (e.g. commercial debt recovery). Cross-industry comparisons could offer valuable insights into best practices and areas for harmonising Standards across the enforcement sector as a whole.

Consider Revising Enforcement Standards Based on Observed Behaviours: During the review, there were instances where EAs exhibited behaviours that, while not breaching existing Standards, caused discomfort or distress to individuals facing enforcement. We have provided a separate note to the ECB outlining these. The ECB may wish to consider revising the current Standards to address these observed behaviours. A more refined set of guidelines could help ensure that EAs engage in practices that not only meet compliance but also mitigate distress, enhancing the overall professionalism and ethicality of the enforcement process.

Appendix I: Research Framework used based on National Standards

Aspects of the interaction

Behaviour type	Behaviour - aligned with key power of an Enforcement Agent	Proposed question	Yes (capture qualitative feedback where relevant)	No (capture qualitative feedback where relevant)	Not applicable
Other breaches of National Standards	Cannot enter a property to take control of goods outside the hours of 6am to 9pm (unless otherwise stated by a Court) or the debtor is a business that is open for the conduct of trade.	Did the EA enter the property during the appropriate hours. This means: If not in possession of a court order, between the hours of 6am and 9pm Outside of 6am and 9pm, if in possession of a court order In the case of a business, between 6am and 9pm, or during the hours it was open?			
Other breaches of National Standards	Cannot gain entry by non-peaceful means, including pushing past a person, jamming a foot in the door or asking to use the toilet. The reason for entry should be clear at all times.	Did the EA enter the property by non-peaceful means, (including pushing past a person, jamming a foot in the door or asking to use the toilet)?			
Misrepresentation of powers	Cannot force initial entry to a residential property, or claim the right to do so (The exceptions are if the person has broken a controlled good agreement or specifically for collecting a	Did the EA wrongly force the initial entry to a residential property, or wrongly claim the right to do so? This could include implying or stating that entry can be forced, including through use of a locksmith			

	magistrates' courts fine in respect of a criminal conviction. In all cases, this must be done 'reasonably' and using a locksmith.				
Misrepresentation of powers	<p>Cannot be deceitful by misrepresenting their powers, qualifications, capacities, experience or abilities.</p> <p>N.B.: An individual can in theory be committed to prison for 90 days for not paying council tax, however this is a last resort and only occurs after ignoring multiple court warnings and a court deciding the person wilfully refused to pay or was culpable. It requires a local authority to apply to magistrates for a Warrant of Committal, which an EA (not CEAs) acting as a warrant officer can then execute, but this is a process which can take weeks or months. An EA can tell an individual factually that this process may be started by the council if they do not pay. This process only applies in England, not Wales.</p>	<p>Was the EA at any point deceitful, in representing their powers, qualifications, capacities, experience or abilities?</p> <p>This could include, stating that failure to pay will result in being arrested or sent to prison, or that the EA will soon return with an arrest warrant.</p>			
Threatening or intimidating behaviour by the EA	Cannot act in a way that is likely to be publicly embarrassing to the person being enforced against.	<p>Did the EA act at any point in a way that was likely to be publicly embarrassing to the person being enforced against?</p> <ul style="list-style-type: none"> • Threatening to tell neighbours or doing so in order to gain entry into the property. • Threatening to contact the individual's place of work 			

		unless the debt is paid, or threatening to involve social services or other third parties that are not relevant.			
Threatening or intimidating behaviour by the EA	Cannot act in a threatening manner when visiting the person being enforced against by making gestures or taking actions which could reasonably be construed as suggesting harm or risk of harm to the individual, their families, appointed third parties or property	<p>Did the EA act in a threatening manner against the person being enforced against at any point, for example by making gestures or taking actions which could reasonably be construed as suggesting harm or risk of harm to the individual, their families, appointed third parties or property?</p> <p>This could include:</p> <ul style="list-style-type: none"> • Acts of aggression such as shouting or raised voices, slamming doors • Using words, actions, or implied threats that cause reasonable fear of injury to the health and safety of any person or property. • Threats to cause physical injury to another person or serious damage to the property. • Physically assaulting the individual or any person in the property. 			
Misrepresentation of powers	Cannot tell the individual that it is an offence to not let them into the property.	Did the EA at any point tell the person being enforced against that it is an offence to not let them into the property?			
Other breaches of National Standards	Cannot refuse to prove their identity if asked by the individual.	Did the EA, refuse to provide their identity when asked?			
Clear failures to respond to vulnerability	Must withdraw without making enquiries if the only persons present appear to be under the age of 12	Did the EA continue to make enquiries if the only person present appears to be under the age of 12?			

Clear failures to respond to vulnerability	Cannot conduct enforcement if the only person present appears to be under the age of 16.	Did the EA continue to conduct enforcement if the only person present appears to be under the age of 16?			
		Did the EA ask a child under the age of 14 when their parent would be home, in the absence of an adult over the age of 16 in the building?			
Clear failures to respond to vulnerability	Cannot conduct the enforcement if the individual facing action is pregnant.	Did the EA continue to conduct enforcement if the individual facing action informs the EA that they are pregnant, alone in the home, and are unable to pay the debt?			
Clear failures to respond to vulnerability	Failure to acknowledge a self-identified or obvious vulnerability and/or to provide any indication of how this might be proven or taken into account.	Did the EA fail to acknowledge a self-identified or obvious vulnerability and/or provide any indication of how this might be proven or taken into account			
Other breaches of National Standards	Cannot breach GDPR legislation, for example, disclosing personal information about other individuals experiencing enforcement action to anyone who lives outside the property.	Did the EA, at any point breach GDPR legislation, for example, by disclosing personal information about other individuals experiencing enforcement action to anyone who lives outside the property?			
Other breaches of National Standards	Cannot discriminate on any grounds including those of age, disability, ethnicity, gender, race, religion or sexual orientation. (Note: this will need to be clearly overt, and not a subjective view).	Did the EA discriminate against the person being enforced against, on any grounds including age, disability, ethnicity, gender, race, religion, or sexual orientation			
Violations of debt services and solutions	Cannot continue enforcing debt, when an individual states they are in Breathing Space and providing a reference number. The Government's Breathing Space scheme allows an individual temporary protection (60 days) from most types of debt collection including enforcement.	Did the EA, at any point continue enforcing debt and/or remain on the property, when an individual states that they are in breathing space and provides a reference number to support this			

	<p>When an individual is in or in the process of one of these solutions the EA should not continue to collect the debt when the individual can provide a reference number or letter proving this. EAs must at the very least stop the enforcement process and check with originating creditor to confirm debt they are enforcing is included in the solution and therefore cannot be enforced.</p>				
Other breaches of National Standards	<p>Cannot continue enforcing debt when an individual states they are in a DRO, in the process of bankruptcy, declared bankrupt or in an IVA and providing a reference number.</p> <p>Solutions such as a Debt Relief Order (DRO), bankruptcy and Individual Voluntary Arrangements (IVA) are legal processes via The Insolvency Service. When an individual is in or in the process of one of these solutions the EA should not continue to collect the debt when the individual can provide a reference number or letter proving this. EAs must at the very least stop the enforcement process and check with originating creditor to confirm debt they are enforcing is included in the solution and therefore cannot be enforced.</p>	<p>Did the EA, at any point continue enforcing debt and/or remain on the property, when an individual states they are in a DRO, in the process of bankruptcy, declared bankrupt or in an IVA and provides a reference number to support this</p>			

Taking goods

Behaviour type	Behaviour - aligned with key power of an Enforcement Agent	Proposed question	Yes	No	Not applicable
Misrepresentation of powers	Cannot remove anything clearly identifiable as an item belonging to, or for the exclusive use of a child (person under the age of 16) or items clearly identifiable as required for the care and treatment of the disabled, elderly and seriously ill.	Did the EA at any point remove anything clearly identifiable as an item belonging to, or for the exclusive use of a child (person under the age of 16) or items clearly identifiable as required for the care and treatment of the disabled, elderly and seriously ill?			
Misrepresentation of powers	Cannot take control or remove goods clearly belonging solely to a third-party not responsible for the debt, e.g. where they have produced a receipt or other evidence.	Did the EA at any point take control or remove goods clearly belonging solely to a third-party not responsible for the debt?			
Misrepresentation of powers	Cannot take control of, remove, or threaten to remove any “exempt goods”.	Did the EA at any point take control of, remove, or threaten to remove any items or equipment (for example, tools, books, telephones, computer equipment and vehicles) which are necessary and for use personally by the individual experiencing enforcement action in their employment, business, trade, profession, study or education			
		In the case of a vehicle, this means that the vehicle is used to carry out work, such as a builder’s van, not a vehicle that is used to travel too/from the place of work. Vehicles removed should not have a value of less than £1,350. Did the EA at any point take control of, remove, or threaten to remove any clothes, beds, bedding, furniture, household equipment, items and provisions as are reasonably required for basic needs of the individual experiencing enforcement action and every member of their household.			

		Did the EA at any point take control of, remove, or threaten to remove any essential items such as a cooker or microwave, fridge, washing machine, dining table and dining chairs.			
		Did the EA at any point take control of, remove, or threaten to remove a landline or mobile phone.			
		Did the EA at any point take control of, remove, or threaten to remove sufficient lighting or heating facilities			
		Did the EA at any point take control of, remove, or threaten to remove medical equipment.			
		Did the EA at any point take control of, remove, or threaten to remove items needed for the care of a child or elderly person.			
		Did the EA at any point take control of, remove, or threaten to remove security or safety equipment such as a CCTV system.			
		Did the EA at any point take control of, remove, or threaten to remove pets.			
		Did the EA at any point take control of, remove, or threaten to remove any item that the individual experiencing enforcement action can prove belongs to someone else.			
		Did the EA at any point take control of, remove, or threaten to remove a vehicle of value £1,350 or less that can be clearly evidenced (such as through insurance) as a tool of the trade (which is vital for operating a business and is solely used for business purposes.			

Instruction to interviewer: Please summarise the method taken by the EA to collect repayment, including what was collected and how.

Instruction to interviewer: Did any instances occur in the course of the interaction that constitute a safeguarding concern. If any such instances occurred, please provide detail on this.

Behaviour towards the Enforcement Agent

Behaviour from individual experiencing enforcement	Proposed question	Yes	No
Acts of aggression directed towards the EA, including physical aggression such as pushing and shoving or verbal abuse.	Did the individual experiencing enforcement, at any stage display an act of aggression directed towards the EA, including physical aggression such as pushing and shoving or verbal abuse.		
Threatening to cause harm or injury to the EA or their family.	Did the individual experiencing enforcement, at any stage threaten to cause harm or injury to the EA or their family.		
Discrimination against the EA on any grounds including those of age, disability, ethnicity, gender, race, religion or sexual orientation. (Note: this will need to be clearly overt, and not a subjective view).	Did the individual experiencing enforcement, at any stage discriminate against the EA on any grounds including those of age, disability, ethnicity, gender, race, religion or sexual orientation. (Note: this will need to be clearly overt, and not a subjective view)		

Good practice

Briefing power	Proposed question	Yes	No	Not applicable
Take a payment by cash, card or bank transfer from either the individual experiencing enforcement action or a friend/family on a voluntary basis and must provide a receipt.	Did the EA provide a receipt following collection of payment by cash, card or bank transfer?			
Support an individual who they may consider to be vulnerable, including allowing them to seek debt advice or referring them back to the client via a welfare team. (N.B. Vulnerability, even if proven, does not automatically exempt a person from enforcement.)	Did the EA provide support to an individual who they may consider to be vulnerable, including allowing them to seek debt advice or referring them back to the client via a welfare team. (N.B. Vulnerability, even if proven, does not automatically exempt a person from enforcement.)			
	Did the EA withdraw when an individual claimed to be vulnerable, and allow them time to submit evidence to support this?			
Gain peaceful entry to a property through a usual mode of entry (they do not need to be invited in and can enter through an unlocked door).	Did the EA gain entry to the property peacefully through a usual mode of entry? This can include an unlocked door, and they do not need to be invited in.			
Gain peaceful entry to a property through a usual mode of entry (they do not need to be invited in and can enter through an unlocked door).	Did the EA make clear their reason for entry?			

Appendix II: Reasons for not being able to view or listen to complete videos

The following tables display the number of videos of visits in which contact was made with the individual facing enforcement or a third party, which were not able to be viewed in their entirety, because they were switched off (not including instances where the video ended due to the visit exceeding the maximum length held by the video database software), or because the audio or video could not be analysed for another reason. In some videos, more than one of the following occurred, thus the figures in the tables below may add up to more than the total number of videos watched.

Was the video switched off for any of the following reasons? (possible to select more than one reason)	Number of instances
Video is switched off due to the presence of a child	0
Video is switched off during the taking of bank card details	6
Video is switched off due to a request by the individual receiving enforcement action or another individual present	1
Video is switched off for other reason	17
<i>Video stopped during apparent break in interaction</i>	5
<i>Video unexpectedly stops for no clear reason</i>	5
<i>Video reaches maximum recording length</i>	3
<i>Video skips forward in time for no clear reason</i>	2
<i>EA volunteers to switch off camera</i>	2
Video is not switched off at any point	624

Did any of the following occur, which made it difficult or impossible to analyse the footage of the BWV? (possible to select more than one reason)	Number of instances
Audio unable to be heard	6
Interaction conducted in a language other than English	2
Other	29
None of the above	614

