

Business Plan 2025/26



ENFORCEMENT
CONDUCT
BOARD

Our Mission

The ECB's mission is to ensure that everyone who experiences enforcement action is treated fairly

Foreword

With the support of our stakeholders, we made significant progress during 2024/25 towards our mission of ensuring that everyone who experiences enforcement action is treated fairly.

- We published ground-breaking independent research which shed light on the scale of non-compliance with existing enforcement standards when Enforcement Agents interact with members of the public.
- Taking account of this evidence, we developed and implemented standards which set a new bar for fair enforcement and, for the first time, apply to enforcement firms as well as agents.
- We developed and implemented our new complaints scheme and started to investigate complaints from members of the public who feel that they haven't been treated fairly through the enforcement process.
- And we extended our reach further by bringing more enforcement firms under our accreditation and making ECB accreditation a mandatory condition for contracts with most local authority creditors.

This has given us a great foundation to build on. And the overriding focus for this business year is now on delivery.

Now is the time to make use of the new framework we have built and really deliver the benefits that we were set up to provide. Ensuring that the industry is embracing and complying with our new standards. Ensuring that people who have

a complaint about how they have been treated get a fair and timely resolution to their complaint. And delivering the crucial remaining sections of our standards on vulnerability and ability to pay.

In many ways, this is the year when our oversight will really start to bite for the industry and those who experience enforcement action.

And so as we embark upon another important and busy year ahead, it will be more important than ever that we continue to prioritise extensive engagement and input from a wide range of people and groups with a stake in this important sector. And I look forward to doing exactly this.

Chris Nichols

CEO, Enforcement
Conduct Board



Progress so far

The ECB is the independent oversight body for enforcement (bailiff) work in England and Wales.

The ECB was formally launched in November 2022. Our Chief Executive started in March 2023 as the first member of staff. By the start of 2025 the ECB team comprised of nine people, making up 7.9 full time equivalents.

The blueprint for the ECB was set out in the Taking Control for Good report of 2021, which was produced by a coalition of debt advice and enforcement industry bodies.

Why our work matters

Enforcement action is extremely important to society, through its role in the collection of public money and in support of the administration of justice. It can also have a profound impact on the lives of those who experience it.

However, until the ECB's creation, there had not been any proactive, independent oversight of this important and sensitive work.

And at a time of huge costs of living pressures on individuals and households and ongoing financial pressures on many creditors, including public bodies, ensuring that there is robust, evidence-based oversight of the enforcement industry is more important than ever.

2024/25 – progress against five key priorities

Our 2024/25 Business Plan set out five key things that needed to change in the market to support achievement of our mission. Below is an overview of the key achievements that we have made in each area during 2024/25.

1) A reliable and objective evidence base

- Publication of independent research analysing over 600 cases of body worn video, assessing Enforcement Agents' compliance with the existing national standards when interacting with members of the public. For the first time, this gives a sense of the scale of compliance and non-compliance by Enforcement Agents with existing rules, during this part of the enforcement process.
- Completion of the pilot of periodic data returns from all accredited enforcement firms, providing significant new evidence on how the market is operating and allowing the ECB to start to identify outlier firms in certain areas. The ECB plans to publish an anonymised, aggregated report on the next data return exercise in 2025.

2) A new, clear and comprehensive set of standards for enforcement work

- Published a new suite of standards for enforcement work for both Enforcement Agents and accredited enforcement firms, alongside guidance on these. These standards set a new benchmark for fair enforcement and our oversight regime will be based around these. During the year, we decided to de-couple the sections on vulnerability and ability to pay from the main standards and deliver these sections in 2025/26.

3) Proactive monitoring and meaningful accountability for those undertaking enforcement work

- Published our oversight model and sanctions framework, which sets the framework for how we will create accountability and ensure that Enforcement Agents and firms are complying with our standards.
- Published our complaints guidance and complaints model, recruited a team to manage our complaints functions and developed and built the systems required for the ECB to determine complaints. We launched our complaints function in January 2025.

4) Long-term sustainability of independent oversight in this sector

- This year was the third round of levy collection from the industry and this was collected in full and on time. We therefore received the income we planned for and are projecting to end the year on budget. We have now received £2,771,000 in total from the industry since the ECB was established.
- Completed the re-accreditation process for the second year of accreditation. This year, firms were required to commit to meeting the ECB's new standards for enforcement and to accept the ECB's determination of complaints. All previously accredited firms applied for re-accreditation and 9 additional firms have signed up (including 8 in-house teams at Local Authorities). This means the ECB's coverage of the market is now likely to be above the 95% already achieved in the first year of accreditation.

5) More consistent and reliable engagement from creditors in driving fair enforcement

- Secured commitments from a very wide range of creditors to only work with ECB accredited firms. This includes:
 - All Welsh local authorities.
 - The YPO (purchasing organisation used by over 75% of local authorities).
 - Four water companies.
 - Lowell.
- Undertaken significant number of workshops with creditors across the country, gaining input into the development of our framework.

Priorities and deliverables for 2025/26

The ECB has made significant progress against the five priority areas outlined in our last business plan. This has laid a strong foundation for significant progress against our mission, as we start to implement full operational oversight of the enforcement sector.

For 2025/26, the overall focus will be on successful delivery of full operational oversight. Most of our work will comprise the next phases of the work delivered in 2024/25. And we will continue to be focused on bringing about the five key changes in the market that are highlighted above.

For 2025/26, our work will be focused around five key areas.



Under each of these five areas, there are a range of activities that the ECB will pursue.

Further detail on what we plan to do under each area is set out below.

1) Setting a new bar – clear and comprehensive standards

(a) Developing and implementing the remaining sections of the ECB standards – vulnerability and ability to pay

- To be developed through extensive engagement with stakeholders.
- To include targeted input from those with lived experience.
- New standards should make a material improvement on the current situation and should be capable of being accepted by our diverse stakeholders.
- New standards to be ready for the third year of ECB accreditation.

2) Delivering a high-quality complaints service for the public

(a) Successful delivery of first year of complaints handling

- Provide a high-quality complaints service to members of the public.
- Meet our KPIs on timeliness and quality of decisions.
- Develop impactful means of sharing learning from complaints, that help drive improvements across the sector.
- Develop a framework for remedy.

(b) Ensure smooth interaction with other complaints schemes

- Continue to develop MoUs and operational protocols for effective collaboration and information sharing with other ombudsman and complaints schemes.

(c) Develop an accessible “Know your rights” document

- Recognising the limitations of the current Notice of Enforcement, we will work collaboratively with the enforcement industry and debt advice sector to develop an accessible one page document for different types of enforcement explaining the process, what Enforcement Agents can and can't do, and what people can do if they believe they have not been treated fairly.
- Materials will undergo some targeted user testing.
- Engage with MoJ on opportunities for this work to form a starting point for improvements to the Notice of Enforcement.

3) Delivering impactful proactive oversight of the market to ensure ECB standards are being met

(a) Data returns

- Delivering the second and third full data return processes and, for the first time, publishing an aggregated report on the process to allow the wider data and learning to be shared.

(b) Other intelligence and risk assessment

- Develop means of assessing the relative risks of different firms (for ECB oversight purposes) and start using this to prioritise the ECB's resources.
- Develop processes for triaging and assessing incoming intelligence.

(c) Pilot monitoring visits

- Undertake a pilot programme of approximately 5 monitoring visits.
- Secure consultancy input from industry expert into design of process.
- Publish anonymised report on this pilot process and plan for how monitoring visits will work in the future.

(d) EAC2 complaints

- Progress any EAC2 complaints that are required to seek to remove certification from Enforcement Agents who are considered not fit to be certified.
- In doing so, establish how to progress these cases effectively and efficiently in the future.

4) Building the long-term sustainability of independent oversight

(a) Deliver third year of accreditation

- Update the accreditation criteria to reflect the new sections of the ECB standards.
- Collect the levy in full.
- Continue to build coverage of the market.

(b) Statutory powers for the ECB

- Engage with the MoJ on the case for the ECB being given targeted legal powers to underpin its work.

5) Engaging and influencing creditors

(a) Build creditor awareness of new ECB standards and complaints handling and how to support this

- Engaging creditors to build trust and further support for the ECB's mission and minimise risks of creditor actions undermining this.
- Identifying innovative creditors and examples of good practice that could contribute to future market learning and improvement.

(b) Develop longer-range strategy and plans for influencing creditors towards driving fair enforcement

- Whilst the focus for 2025/26 is primarily on delivery of the ECB's core operations, we will use this year to plan how we will approach engaging and influencing creditors in future years, when we have more data and evidence to deploy and more bandwidth to push in this area. This recognises the crucial role creditors play in ensuring that enforcement is fair for all.

Overarching principles and approach

Our entire programme of work will reflect five overarching principles, originally set out in the Taking Control for Good report in 2021. These principles remain appropriate and valid for the ECB during the next period of our development.

They are:

- Independence.
- Ambition.
- Proportionality.
- Collaboration.
- Transparency.

Budget

The ECB is funded by a levy paid by all accredited firms.

The budget to deliver this business plan is approximately £1.4m (an increase of £205k (17%) compared to 2024/25).

The main headline costs in the budget are as follows:

Category	Budget assigned (rounded up)
Staff costs (full costs including pension and NI)	£884k
Board member costs (full costs including NI)	£119k
Travel, meeting rooms and expenses (including staff, Board and Board meetings)	£71k
Legal fees	£60k
Complaints scheme (IT, expert panel, phone system)	£53k
Professional fees and insurance	£52k
Lived experience (vulnerability and ability to pay)	£30k
Recruitment costs (2 x board members plus 1x staff)	£35k
Other IT and systems	£27k
Enforcement industry expert consultancy	£10k
Building reserves	£9k
Lived experience user testing (know your rights)	£5k-10k

Our budget has been developed to provide the ECB with the resources it needs to deliver its business plan. As always, we have been careful to ensure that the budget remains proportionate. In this regard, we recognise that the enforcement industry did not receive the 5% fee increase that the last Government recommended, alongside the fact that enforcement firms (like the ECB) will have had their costs increase as a result of increases in employers NI and the living wage.

As forewarned in previous years, our budget has increased this year, reflecting the increased costs of starting to deliver operational oversight. The main increases are in staff costs, reflecting the growth of the ECB staff team to deliver operational oversight and full year salary costs for the new posts that were introduced during 2024/25. Having built our core operational team, we do not currently envisage significant future growth in the ECB staff team.

We have sought to limit all discretionary spend this year. For example, our budget for this year does not include any new pieces of research and we will remain a remote organisation, without the costs of maintaining an office.

This budget will result in a levy of 0.49% of firms' turnover from TCOG work fees.