



ECB response to its draft business plan consultation 2025/26

April 2025

Executive summary

1. The ECB is grateful to all those who have been engaged in in the development of our third business plan.
2. We received nine formal responses to our consultation, in addition to wider targeted engagement as the plan was being developed.
3. Responses to the consultation came from the enforcement industry, the debt advice sector and membership bodies.
4. The responses received were broadly supportive, particularly around the core ECB workplan and overall focus on delivery.
5. In line with the responses to this consultation we have retained the priorities we set out in the draft business plan. In addition to this we have made amendments in line with the feedback we received. Attached is our final business plan which includes drafting changes following the input from stakeholders during this consultation.
6. The responses to this consultation contain valuable insight into the views of our stakeholders on our programme of work for the next year and we look forward to continuing our engagement with them as we begin to deliver on the priorities set out in the final business plan.

Background

7. The ECB is the independent oversight body for the enforcement industry. We were set up with agreement between the enforcement industry and leading debt advice charities including Money Advice Trust, Christians Against Poverty and Step Change. Our mission is to ensure that everyone who experiences enforcement action is treated fairly.
8. In February 2025, we published a consultation on our draft business plan for 2025/6, which sets out our key strategic priorities and planned deliverables for the year ahead.
9. We were interested in hearing from all stakeholders with an interest in fair enforcement, including industry, consumer groups and the debt advice sector.
10. Prior to the start of this consultation, an earlier draft of our Business Plan was shared with our Stakeholder Engagement Forum.
11. The forum comprises representatives from the enforcement industry and the debt advice sector. Their feedback was taken into consideration in the development of the draft plan.
12. The consultation sought responses on the following questions:

Q1 – Do you have any comments on the proposed priorities for 2025/26?

Q2 – Are there any activities that you believe the ECB should be prioritising that are not contained in this plan?

Q3 – Do you have any comments on the draft budget and levy?

Q4 – Are there any other comments or observations that you would like to make?

13. The consultation closed on the **12th March 2025** and received nine responses, from the following bodies:

- The Civil Enforcement Association (CIVEA)
- The High Court Enforcement Officers Association (HCEOA)
- Money Advice Trust
- Step Change
- Institute of Money Advisers
- DCBL (an ECB accredited firm)
- Newlyn (an ECB accredited firm)
- CDER Group, Rundle and Court Enforcement Services (ECB accredited firms)
- Lowell

14. Some of the above organisations also engaged in the development of the draft business plan informally in the stakeholder engagement forum.

15. The points below summarise the responses to each of the consultation questions, alongside the ECB's response.

Consultation responses

Q1 – Do you have any comments on the proposed priorities for 2025/26?

16. Overall, responses were very positive about the content of the draft business plan and the main focus on delivery for the year ahead.

17. Within this, the main themes raised by respondents on the business plan were as follows:

- **Know your rights work** – there was strong support from the debt advice sector for the ECB undertaking this work and also in some industry responses. Other responses from the enforcement industry, on the other hand, expressed concern about the idea of a “know your rights” document and concern that this workstream could mean the ECB overreaching its remit. Specific concerns raised included duplication of cost and effort when there is already lots of information available on Gov.uk, debt advice websites and in other places. CIVEA also referenced the work it does to raise public awareness and concern about its members essentially paying twice for public awareness work. Some responses suggested that this work should focus on revamping the Notice of Enforcement and taking control of this from the MoJ, instead of developing a separate document. HCEOA in particular cautioned against the ECB creating a requirement for a new hard copy document that would need to be sent alongside the existing Notice of Enforcement and stated a preference for work on revamping the core document with MoJ.
- **Lived experience work** – this work was supported strongly by the debt advice sector, who see it as key to developing meaningful standards on vulnerability and

ability to pay. Industry responses did not oppose the concept but some (including the HCEOA) expressed concern about the costs that had been budgeted, which were seen as too high. They also stressed the importance of this work involving properly representative samples of people, expressing a fear that in practice the ECB might use cherry picked samples of debt advice clients. There were also suggestions that some expert behavioural insight type input might be more valuable than lived experience testing.

- **Research and evaluation** – responses from the debt advice sector generally acknowledged the pause in commissioned research for this year as we focus on delivery but stressed the importance of the ECB continuing to lay the groundwork for meaningful evaluation of the impact of its changes and planning to commission further research in future years to assist with this.
- **Work with creditors** – some responses from both the debt advice sector and enforcement industry noted specific support for the ECB's goal of seeking to influence creditor behaviour, noting what an important role creditors have to play in the market and in supporting fair enforcement.
- **The ECB's remit** – a number of responses noted views on the ECB's remit and cautioned against the ECB seeking to go beyond the blueprint for independent oversight set out in the Taking Control for Good report. In particular, two responses specifically expressed a view that consumer education is not within the ECB's remit.

ECB response

18. We are encouraged by the overall support for the content and approach to our business plan. Our response on the specific themes highlighted above is set out below.

Know your rights work and ECB's remit

19. We do not believe that at the moment there is a concise, balanced, well designed and user-friendly advice product for members of the public experiencing enforcement action already out there. And we think it is important that this gap is filled, so that those who are experiencing enforcement action can benefit from this. We believe that fostering greater understanding of the process and rights within it could also be of benefit to enforcement firms and enforcement agents and note that this point was made by one firm in response to this consultation and was also noted numerous times in our previous consultations and engagement on the ECB's standards.

20. We recognise concerns expressed about the potential cost of this work. It is important to clarify that of the £30-40k assigned in the budget to lived experience panels and testing, we are only expecting the user testing of this product to account for £5-10k of this. The majority of that budget is assigned to lived experience work to support the vulnerability and ability to pay standards, which are larger workstreams. We have separated the costs out in the business plan for greater transparency on this point. We believe that £5-10k is proportionate expenditure for a product that should deliver significant value.

21. We also acknowledge concerns expressed about the ECB appearing to be embarking upon a wide scale public awareness campaign. This is not what is planned. We believe that the ECB's focus should be on ensuring that those who experience enforcement

action have access to better information. We agree that it would not be a proportionate or sensible use of resource for the ECB to undertake a wide scale public awareness campaign.

22. We have included additional lines in the business plan to reflect our intention to work with the MoJ on using this work to inform future improvements to the Notice of Enforcement, recognising recommendations made in this regard from respondents.
23. Taking account of the points made in paragraph 21 above, we are confident that the ECB's business plan and current focus remains consistent with the blueprint set out in the Taking Control for Good Report in 2021. And we will continue to be guided by this framework. At the same time, the report sets a high level framework and as we continue to enhance our evidence-based understanding of the sector, it is important that our plans and focus evolve consistent with this.

Lived experience work

24. We agree that this work will play an important role in feeding into development of our standards on vulnerability and ability to pay. We recognise concerns about how people will be sourced for the panels that will contribute to this work. It is precisely because of our desire to ensure that we have a balanced, representative groups of people that we have assigned a budget to this work that will allow us to work with a well-regarded agency to handle recruitment and management of the panels.
25. In relation to the size of the budget assigned, we believe that this is a proportionate figure to make provision for this work. In practice, we will tender for this work to help ensure that we get the best value support within this budget.
26. It is also important to point out that this work will be one of many inputs into our work in this area. Whilst important, this work is not expected in itself to give us the answers in these areas.

Research and evidence gathering

27. Whilst we are not commissioning any research this year, it will still be a year in which we continue to build and share an increasingly rich evidence base on the market. In particular, we will be publishing the first report on the aggregate data return evidence and evidence from the first year of our complaints scheme. We expect to run further commissioned research in future years.

Q2 – Are there any activities that you believe the ECB should be prioritising that are not contained in this plan?

28. Most respondents did not identify specific additional activities for the ECB to be progressing. The main suggestions made were:
 - CIVEA stated that the ECB should focus more on parking enforcement as its focus has been disproportionately on council tax so far. It also stressed the importance of focussing on bringing more LA in house teams under accreditation.
 - Some industry responses noted the role the ECB could play in shining a light on and seeking to address poor creditor practices around social value and added value.

- Lowell suggested that ECB could do more to prioritise improving data sharing between LAs and the enforcement industry.
- Money Advice Trust and Stepchange included suggestions for further monitoring of impact and research and evaluation projects.

ECB response

29. We welcome all of these suggestions. In relation to increasing our focus on parking enforcement, this is something that we already have in hand and will be prioritising over the coming year. We have commented above on our plans for future evidence and research work and will factor in the specific recommendations made as part of this. On the suggestions on creditors, these are things that we will consider how to take forward through our planned work on creditors.

Q3 – Do you have any comments on the draft budget and levy?

30. Overall, from consultation responses and other engagement, the debt advice sector is supportive of the budget and encouraged us to ensure that we have sufficient resources for robust monitoring and oversight. Stepchange also mentioned concern about the lack of statutory underpinning for the funding model.

31. On the other hand, the enforcement industry expressed concerns about the scale of the proposed rise in the budget and levy. Responses noted that fees had remained static since 2014 whilst costs had significantly increased in this period. It was noted that the incoming Employers' National Insurance and minimum wage changes would add to this, significantly increasing costs for firms whilst fees remained unchanged, in spite of the previous Government having agreed to increase them. Some firms have also noted that the cost of the ECB goes beyond the levy, as there are wider costs associated with the work needed to comply with the new standards.

32. The consultation encouraged respondents to focus any concerns in relation to the budget primarily on three areas of increased spend that were not directly linked to delivery of the ECB's core operational oversight. One area was the lived experience research, which has been covered above. Whilst there was concern expressed by some about the amount of money assigned to this, there was little sense that this should not be a line in the budget at all.

33. There was support overall for recruitment of an additional Board member, with responses from industry expressing the importance of the ECB using this opportunity to bring in more direct enforcement industry experience into the Board.

34. There was little push back in consultation responses to the modest proposed building of reserves. In the targeted engagement, this was an area that some firms suggested some savings could be made to keep overall costs down.

35. Beyond these highlighted areas, there were some comments made about the size of specific budget lines, such as:

- The size of the budget line on staff and board costs and what this suggests in terms of staff salaries
- A perceived excessive increase in travel budget
- The amount of budget assigned to recruitment costs.

36. The HCEOA noted how the levy has risen each year since the ECB was established and sought commitments to avoid future rises to the levy, given that the ECB has now built its core team and in recognition of wider cost pressures on the sector.
37. The IMA suggested that the ECB should allocate some budget for reimbursing costs to smaller debt advice groups for contributing to the ECB's work.

ECB response

38. As set out in the consultation paper itself, we recognise the challenging economic context in the market. And we are grateful for the constructive feedback we have received from respondents in the light of this.
39. We have taken account of the responses and feedback received and made the following changes to our budget:
- We have sought to provide more granularity to the budget figures in the business plan to better contextualise the costs. For example, we have separated Board and staff costs and made clear that the staff costs line includes Employers' NI and employers' pension contributions. Similarly, we have better itemised the recruitment costs, which are now estimated at £35k (the response that expressed concern about this had taken a figure of £55k from the draft budget).
 - In relation to the concern about the perceived jump in travel costs, again we have sought to emphasise that this line includes travel, meeting rooms and expenses for both staff and Board. This amalgamated line has only increased around £3k since last year and the specific travel element has also not increased significantly. The small increase that there is reflects the growth of the team and allowances for more on-site visits. For a remote organisation with no office costs and that places importance on spending time in the field and meeting in person with stakeholders, we believe that £71k is a proportionate budget for travel, meeting rooms and necessary accommodation costs.
 - We have added a £10k provision for procuring industry specific expertise to feed into the development of our oversight model and pilot visits. This will help to ensure that we develop an approach that is practical and effective. This is in addition to separate existing budget for our pool of expert advisers who will be able to advise on specific complaints or oversight issues that arise in the future and ongoing ad-hoc access to industry experts who have been providing technical advice on our work throughout the last year.
 - We have reduced the planned building of reserves this year from £26k to £9k to account for the additional investment in industry expertise and to ensure that the budget did not rise following consultation. However, we have agreed that we would plan to prioritise redirecting any in year underspend towards further building our reserves to make up this shortfall.
40. Overall, we are retaining a budget of £1.4m, in line with what we consulted on. However, we are pleased to be able to confirm that we will not need to set the levy at 0.51% (as indicated in the consultation) to meet this budget. Now that we have actual turnover figures from all firms, including the 8 new in house local authority teams, we can confirm

that the levy will need to be set at 0.49% of TCOG turnover in order to meet our budget. This is now a smaller increase (around 11%) compared to the 0.44% levy from last year.

41. In relation to comments made about future rises, as set out in the initial consultation, we have now built the core ECB team and we are not currently envisaging significant future growth in the size of the team (unless complaint volumes significantly increase over historic levels). For future budgets, we will continue to focus on proportionality, transparency and engagement before settling our levy.

Q4 – Are there any other comments or observations that you would like to make?

42. One response from an enforcement firm expressed concern about the lack of technical enforcement industry expertise at the ECB and also a concern that the ECB could be disproportionately influenced by larger firms and not always hear enough from medium and smaller firms.
43. CIVEA and another response emphasised again the importance of the ECB being mindful of its remit and the importance of focussing on the core brief of monitoring standards and complaints adjudication. CIVEA emphasised the importance of building trust with industry, of gathering and following the evidence and of the ECB not seeing itself as a voice for consumers. It noted its support and the industry funding provided to date and a commitment to continue to support the ECB to ensure that the evidence it obtains is robust and complete.
44. Stepchange and Money Advice Trust noted the ongoing importance of the ECB continuing to keep its staffing and resourcing needs under review to ensure that it is able to provide sufficiently robust oversight.

ECB response

45. We have set out above the measures that we are taking to ensure that we have access to appropriate levels of expert and technical expertise. We have also supported members of our complaints team to achieve their Level 2 TCOG qualifications to build our own in house knowledge and expertise.
46. We are interested in ideas for how we can continue to ensure that our work benefits from input from a range of stakeholders, including firms of all sizes. We have found that offering separate workshops for small, medium and large firms has worked well on the standards development and data returns so far and we plan to continue this approach.
47. We note the points made about the ECB's remit and support for our core focus for the year ahead. We will continue to be evidence-led and to concentrate on building our evidence-based understanding of what is happening in the market.
48. In relation to resources, we believe that our budget will provide us with the resources that we will need to deliver this business plan. We will of course need to keep our resourcing under review, particularly in relation to complaints, where demand is hard to predict. This is one of the reasons that it is important that we maintain a reasonable level of reserves.