

## ECB Board Meeting – Wednesday 15 October 2025

Venue: Covent Garden, London

**Member attendance:** Catherine Brown (Chair), Alan Cavill, Gerard Curran, Caroline Wells, Chris Nichols (CEO)

**Apologies:** Althea Efunshile

**In attendance:** Louise Rubin, David Parkin, Holly Perry (minutes)

### Minutes

#### Item 1: Board stakeholder session

1. The Board meeting was preceded by a Board stakeholder session with representatives from the debt advice sector, including; Vikki Brownridge, Chief Executive of StepChange; Peter Grigg, Executive Director of Partnerships and Advocacy at Citizens Advice; Helen Undy, Chief Executive of Money and Mental Health Policy Institute, and Steve Vaid, CEO of the Money Advice Trust.

#### Item 2: Welcome, apologies and declarations

2. The Chair welcomed all present, including Caroline Wells, who was attending her first meeting since taking up the role of Board member on 1 October 2025. The Chair advised that new Board member Delroy Corinaldi would be joining on 1 January 2026, and was expected to observe the Board's 26 November 2025 meeting.
3. Apologies had been received from Althea Efunshile, and it was noted that her written comments would be considered at the appropriate points during the meeting. The Chair declared an interest in relation to item 7, on the basis that she was currently interim Chair of the Legal Services Board (LSB) (and substantively, a Board member of the LSB).

#### Item 3: Minutes of the previous meeting

4. The minutes of the 3 September 2025 Board meeting were **agreed** as an accurate record of the meeting. The Board **agreed** a small number of redactions in the minutes prior to publication.

#### Item 4: Matters arising

5. The Board **noted** the action tracker and Board forward agendas.

#### Item 5: Chief Executive's Report

6. The Chief Executive presented the report and the following points were raised in discussion:
  - i. It was confirmed that the new Secretary of State was David Lammy, and that the Minister with responsibility for enforcement, Sarah Sackman KC, had not changed.

- ii. The compliance team was especially active currently, now that the targeted review and thematic review work was underway.
- iii. The ECB was close to agreeing a Memorandum of Understanding (MoU) with the High Court Enforcement Officers' Association (HCEOA), however there was some further work to do to finalise the MoU with the Public Services Ombudsman for Wales (PSOW) with some final points to resolve.
- iv. The Vulnerability and Ability to Pay (V&A2P) consultation was now live, and would close on 31 October. Following a detailed review of the workplan at a recent senior leadership meeting, the executive was proposing for the final consultation response and standards to be presented to the January Board, and this was agreed. The insights report would also be presented in January.

#### *Complaints update*

- v. Tizo's investigation into the options for AI in the complaints process had been noted previously by the Board. A question was raised whether the team had been able to assess the adequacy of Tizo's response, and it was confirmed that while there was some functionality to help with streamlining processes, this was at the preliminary stage in terms of implementation, and at the margins of the work, rather than central to it. It was noted that there would be a process review of the ECB's approach to complaints handling in 2026/27 to consider lessons learned from the first year of operation and to identify opportunities for maximising the efficiency of our process to help manage demand. In the meantime, the team would review other options that might be immediately available on AI (**action**).
- vi. The Board noted that the complaints rate being reported via the data returns (see next item) was very low and that the ECB could therefore expect further increases in complaints in coming months and years as awareness and confidence in complaining grows amongst those who experience enforcement action. Complaints trends and analysis would be presented to the Board at its next meeting.
- vii. The Board welcomed the introduction of the demographic questionnaire.

#### *Developments in relation to Marston Holdings (MH)*

- i. The Board considered an update from the executive on developments in relation to Marston Holdings (MH).
7. The Board **noted** the Chief Executive's report.

#### **Item 6: Analysis of data returns January to June 2025**

- 8. The Director of Policy and Oversight presented the paper and report, which provided the findings from Data Returns (DR) submitted by accredited firms for the six months from 1 January to 30 June 2025. This was the ECB's second DR, (DR1 covered 1 April to 31 Dec 2024) and the first from which the ECB planned to publish results - in anonymised and aggregated form - in the Insight Report (IR) in January 2026. The ECB now had some 14,000 data points from the returns received to date.
- 9. The Board **noted** the report on the analysis of data returns. The Board thanked the team for the hard work that had gone into assessing the data, concluding that the

report was very rich, and provided a large number of jumping off points for oversight. The next data set would be ready to present to Board at its March or April 2026 meeting.

#### **Item 7: Administrative arrangements for statutory status**

10. The Chief Executive presented the paper which provided the Board with a brief update on the latest progress with the Ministry of Justice (MoJ) consultation on reform of the debt enforcement sector, and also provided a briefing on what the administrative arrangements for statutory status would look like.
11. The Board **noted** the paper.

#### **Item 8: Budget reforecast 2025/26**

12. The Director of Corporate Services presented the paper, which set out a mid-year reforecast based on 5 months of actual expenditure (April to August) and reforecast the remaining 7 months of future expenditure to the end of the current financial year. The reforecast suggested that in order to deliver the work programme, avoid the development of an unacceptable backlog of complaints and ensure that the ECB was able to resource the thematic review and wider oversight work, it was necessary to invest an additional £108k in staff salary costs over the remainder of 2025/26, and also £16k in pension and £9k on employer NI. If the additional investment was agreed by Board, it would be partly offset by £20k of additional income, and some small savings on other cost lines, leading to a deficit of £81k. The following points were noted:
  - i. The plan to direct additional resource to complaints was fully supported, and the impact on the plan to build reserves was noted.
  - ii. It was agreed that a financial strategy should be developed to help the ECB strike the right balance between building contingency into budget setting, ensuring that reserves were sufficient, and balancing the budget at year end (**action**).
  - iii. It was inevitable that the pressure would only increase in relation to complaints, and this would be reflected in the budget plans for 2026/27. This serves to emphasise the importance of reviewing the process to ensure that efficiency is maximised.
13. The Board **agreed** the mid-year reforecast which would now supersede the original 2025/26 budget as the target to measure actual expenditure against for the remainder of the financial year.

#### **Item 9: Governance policies for review and approval (a) Matters reserved and scheme of delegation and (b) Financial policy and financial scheme of delegations**

14. The Director of Corporate Services presented two policies for the Board's review. Both policies had been in place for two years and appeared to be operating well. No substantive changes were proposed to the Matters reserved and scheme of delegations. Some minor changes were proposed to the Financial policy and financial scheme of delegations. Both policies were approved as drafted, and would be reviewed again in two years' time (**action**).

**Item 10: AOB**

15. There was no other business. The Board reflected that it had found the stakeholder session at the start of the afternoon insightful, and considered that the overall balance of topics on the agenda had been helpful. The Board thanked the Chief Executive and team for the high quality papers, which had assisted discussions.

**Item 11: Strategy session**

16. The Board met for a strategy session after the main meeting. The discussion would help to inform the early scoping of the business plan and budget 2026/27, which would be presented to the November Board.

**Private session**

17. The Board met for a private session, and among other matters, considered the results of the 2025 Board evaluation exercise and CEO pay.