



ENFORCEMENT  
CONDUCT  
BOARD

VERSION 1 / JANUARY 2026

# 2026 INSIGHT REPORT

*Key data on the enforcement  
(bailiff) industry.*



# Executive Summary

The Enforcement Conduct Board (ECB) was established in 2022 and became fully operational in 2025. We set standards for accredited firms and agents, oversee their activities to ensure the standards are met, and offer a second-tier complaints service for people who feel they have been treated unfairly by an enforcement firm or agent.

This report brings together data from our oversight and complaints work, as well as the twice-yearly self reported data returns that accredited firms provide. It provides a comprehensive account of enforcement process and practices in 2025 and is the first of what will be annual reports from the ECB.




## Enforcement Industry Data and Processes

- As of November 2025, there are **55 organisations accredited by the ECB**. 45 are in the private sector **covering around 97% of the enforcement market**, and 10 are accredited local authority in-house enforcement teams.
- Enforcement is a significant sector in England and Wales. From 1 January to 30 June 2025, the **industry received almost 3.7m cases for enforcement** under the Taking Control of Goods (TCOG) process, with a **total debt value of almost £2.2bn**.
- The **total value of debts collected by enforcement agents** in this period (without fees) **was £527m**. This indicates that the industry will be **collecting over £1bn of debts a year**.
- **Goods were taken away in 2,624 cases** (almost all vehicles)
- **Firms identified vulnerability in 177,618 cases** between January and June 2025. **Support was provided in 43% of cases** where vulnerability was identified, and the **case was returned to the creditor in 8% of the cases**.
- There were **1,535 assaults or threats of assaults on enforcement agents** during the period; **184 of these were physical assaults on agents**.
- Accredited **firms received 4,691 new complaints** between January and June 2025: a **complaint rate of 0.1%**. **Firms did not uphold 91% of the cases**.

 **55**  
ECB ACCREDITED ORGANISATIONS

**97%**  
OF THE MARKET 

  
**3.7M**  
CASES FOR ENFORCEMENT

  
TOTAL VALUE OF DEBTS COLLECTED BY ENFORCEMENT AGENTS  
**£527M**

  
**177,618**  
CASES OF VULNERABILITY IDENTIFIED

ECB Complaints Handling

- The ECB launched our complaints service in January 2025. Between 6 January and 30 September, we received **515** complaints. 100 met our criteria for investigation.
- By 30 September we had completed 38 complaint investigations. **Half were either upheld or partially upheld.**
- The five themes investigated most often related to agents or firms failing to: act lawfully and appropriately; meet statutory or financial requirements; properly consider vulnerability or ability to pay; properly handle complaints; or follow the correct process when taking control of goods.
- Our investigations have led us to ask firms to change their processes or procedures, as follows:



Changes / reminders recommended	Number of recommendations
Improvements to complaint handling	6
Reminders on the enforcement process	6
Use of de-escalation techniques and importance of remaining calm and professional	5
Improvements to consideration of taking control of goods	4
Enforcement visits should not be undertaken when it is known that the body worn video equipment is not working	1

- As a result of our work at investigation stage we have provided the following individual remedies to complaints:

Remedies	Number
Apologies	15
Consolatory payment	10 (ranging from £50 to £250)
Refund / removal of fees / financial loss	4 (£2,672 in total)
Review of payment plan / affordability to pay	1

- The number of complaints we handled grew steadily through the period and we are projecting much larger volumes for the year ahead (400 to 600 investigations).

Breaches of ECB Standards

- In 2024 we commissioned independent research which found that agents were breaching the Government’s 2014 National Standards in **6%** of their doorstep interactions.
- Since then, the ECB has published its own, more robust Standards for firms and agents. This report provides insight into the most common breaches of the ECB’s Standards, both on the doorstep and at other stages of the enforcement process.



Identified breaches	No of upheld complaints (from 38 concluded investigations)
Failing to act lawfully and appropriately (including threatening behaviour)	7
Inadequate complaints handling	6
Poor treatment of vulnerable people	4
Breaching statutory and financial requirements (including incorrect application of fees)	3
Threatening to take control of exempt goods	2
Clamping vehicles displaying disabled badges	2

- Section 3 of this report sets out five real case studies that illustrate some of these breaches.
- **10 Enforcement Agents were dismissed by their employer for misconduct** in the reporting period. 2 Agents had their certificate removed by the Court. We therefore believe that the majority of those dismissed for enforcement conduct reasons are **still working as Enforcement Agents**, at other firms.
- The ECB is involved in an ongoing case that was reported in the national media about identified **overcharging of enforcement fees** by a large enforcement firm. This has **impacted a large number of people** who had multiple debts that could have been enforced at the same time.





# Introduction

The ECB is the independent oversight body for the debt enforcement (“bailiff”) sector in England and Wales. Our mission is to ensure that everyone experiencing enforcement action is treated fairly and protected from poor practice.

Our remit covers enforcement under the statutory Taking Control of Goods (TCOG) process, which includes Council Tax arrears, parking and traffic fines, Non-Domestic Rates, High Court work, Commercial and Rent Arrears recovery and other debt enforcement.

We were established in 2022 after a collaboration between the enforcement industry, debt advice organisations and the Centre for Social Justice. We became fully operational in 2025. Our core functions include:

- Setting standards for enforcement firms and agents,
- Accrediting enforcement firms and overseeing their activities to ensure they meet our Standards,
- Operating an independent second-tier complaints service for people who believe they have been treated unfairly by an enforcement firm or agent,
- Compiling evidence, data and research on the industry and using it to drive good practice.

Building a reliable, objective evidence base has been a key focus for the ECB since our inception. There is no shortage of opinion on enforcement practices, but meaningful data on how the enforcement industry is performing has been harder to come by. We are now able to make a significant new contribution by publishing data from three sources: our twice yearly data returns from enforcement firms, our second-tier complaints service, and our oversight programme.

All our data sources are relatively young, with our complaints service and oversight programme having launched in 2025, and the overall numbers of cases we have investigated reflect this. Nonetheless, we are able to present some early findings.

The primary aim of publishing this report is to ensure that conversations about the enforcement industry, and any future reforms, are based on objective fact and evidence. We also believe that sharing this evidence and ECB decisions will help to drive good practice across the industry.

# ECB data sources

The data and evidence we present in this report comes from three sources:

**1. Data returns (DR):** Twice a year we ask all accredited enforcement firms to provide relevant data on a range of enforcement indicators, including the volume and value of instructions for debt enforcement passed to them by creditors, the stage in the enforcement process at which payments were collected, the complaints firms have received, and more. Covering a series of over 300 data points, the DRs provide the most comprehensive self-reported assessment we have of enforcement activity under TCOG.

The DR in this document covers the period January to June 2025. Where possible, data is broken down into the following categories:

- **Council tax** – debts accrued by an individual who has not paid council tax to the local authority.
- **Non domestic rates** – debts accrued by business owners who have not paid the property taxes applied to offices, shops, pubs and other non-residential buildings.
- **Road traffic** – debts related to unpaid parking fines or road traffic fines such as the Dart Charge. These debts are typically owed to the local authority, Transport for London or National Highways.
- **Criminal** – unpaid criminal fines.
- **High Court** – debts enforced by High Court Enforcement Officers include utilities bills and other business debts.
- **Other** – including Commercial Rent Arrears Recovery and collection of overpaid tribunal awards.

**2. ECB’s complaints service:** Our complaints handling function launched in January 2025 and this report uses data from January to September 2025. We can consider complaints about the conduct of an enforcement agent (EA) or firm if it relates to activity on or after 1 January 2025 and has already been through the firm’s internal complaints process.

**3. ECB’s oversight and compliance programme:** Our oversight work is designed to ensure that firms and agents are complying with our Standards and allows us to see how they are operating in practice. We carry out proactive oversight and have several routes through which people can report potential breaches of our Standards, even when they are not directly affected. This work only began in earnest from the Spring of 2025.





## SECTION 1

# ENFORCEMENT INDUSTRY DATA AND PROCESSES



## 1. Enforcement Industry Data and Processes

### 1.1 Number of firms and agents

As of November 2025, there are 55 organisations accredited by the ECB. 45 are in the private sector covering, we believe, around 97% of the enforcement market. In addition, there are 10 accredited local authority in-house enforcement teams.

The 45 private sector firms accredited by the ECB range in size from large companies with several hundred accredited agents down to operations with a handful of agents. 10 firms have a turnover of more than £4m a year, while 8 firms have one of less than £25k a year.

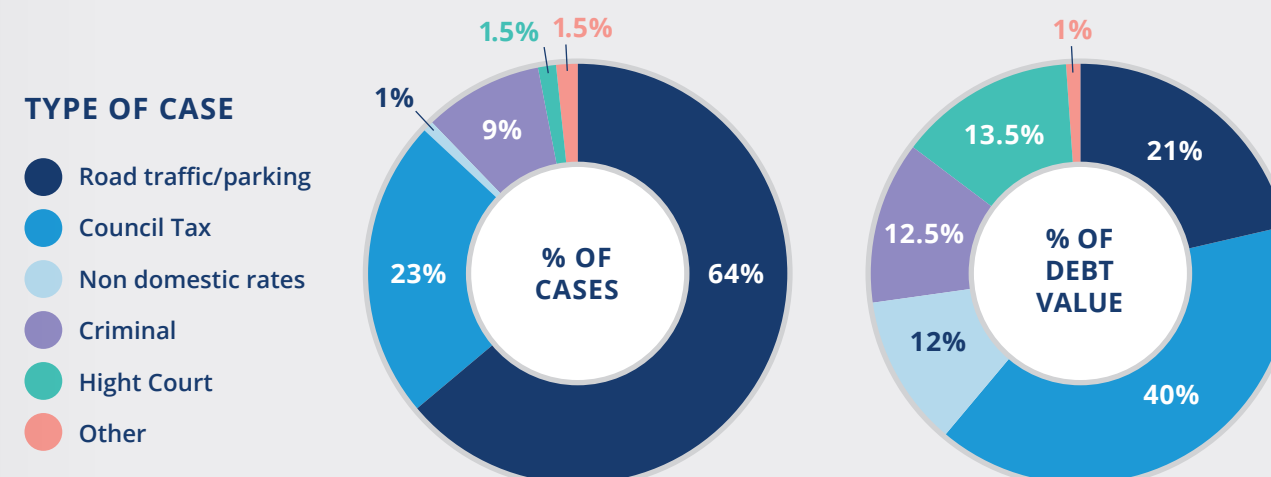
A small number of firms have so far decided against ECB accreditation and oversight, and we estimate that over 200,000 debts each year will be enforced by those firms – without any of the protections that the ECB offers.

The Ministry of Justice maintains the Certified Bailiff Register, documenting all agents who have gained certificates to perform TCOG activities. There are around 1,700 EAs (both civil and High Court) on the Bailiff Register and these are split between salaried and self-employed agents.

### 1.2 Enforcement cases received

Enforcement is a significant sector in England and Wales, receiving millions of cases each year worth billions of pounds – much of which is public money. From 1 January to 30 June 2025, the industry received almost 3.7m cases for enforcement under TCOG. The proportion of debt types were:

The total debt value of the 3.7m cases received was almost £2.2bn. This is broken down by debt type as follows:



At the beginning of July 2025 the industry was working on £3.5bn of TCOG debt.

### 1.3 Value of debts collected

The total value of debts collected by enforcement agents in this period (without fees) was £527m. This indicates that the industry will be collecting over £1bn of debts a year.

Enforcement firms secured all or some repayment in 21% of cases. Of this, just over half were paid in instalments, rather than in one go.

For every case the industry did close with a payment, the average amount collected in repaid debt was £712. The average enforcement fee collected by firms, per case paid in full, was £201. The average fee was lower for Civil work (£184) than High Court work (£569), reflecting the different fee structure for High Court work.

For each paid case, over 3.7 cases were returned to a creditor without any payment, often at their request. Cases returned to creditor without payment had a combined value of around £1.5bn.

**Table 1: Value of debts collected at each stage of the enforcement process (£, rounded to nearest K or M)**

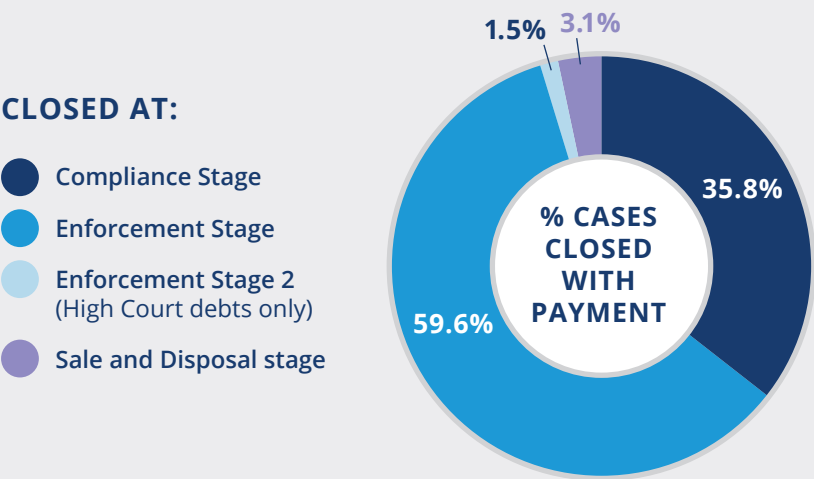
	Council Tax	Non-Dom Rates	Road traffic	Criminal fines	High Court	Other	Total
Compliance							
Closed - recovered in full	80.2m	11.3m	24.9m	4.6m	8.8m	2.2m	132.0m
Closed - recovered in part	7.9m	1.0m	509k	235k	2.7m	117k	12.4m
Total	88.1m	12.3m	25.4m	4.8m	11.5m	2.3m	144.4m
Enforcement							
Closed - recovered in full	130.4m	45.9m	36.8m	13.2m	11.8m	2.4m	240.5m
Closed - recovered in part	34.5m	9.8m	3.5m	4.1m	11.9m	801k	64.6m
Total	164.9m	55.7m	40.2m	17.3m	23.7m	3.2m	305.1m
Second enforcement stage							
Closed - recovered in full	0k	0k	0k	0k	21.0m	5k	21.0m
Closed - recovered in part	0k	0k	0k	0k	9.8m	0k	9.8m
Total	0k	0k	0k	0k	30.8m	5k	30.8m
Sale stage							
Closed - recovered in full	1.9m	729k	3.6m	247k	4.9m	122k	11.5m
Closed - recovered in part	859k	299k	210k	28k	1.3m	16k	2.7m
Total	2.8m	1.0m	3.8m	276k	6.2m	138k	14.2m
Total Closed - recovered in full	212.5m	57.9m	65.3m	18.0m	46.5m	4.8m	405.0m
Total Closed - recovered in part	43.3m	11.1m	4.2m	4.6m	25.7m	934k	89.4m
Total Closed - returned no recovery	499.5m	168.9m	386.1m	212.0m	143.1m	14.9m	1424.6m

In addition, enforcement firms received around £17.6m in early settlement of debts at ‘pre-compliance’, without a formal Notice of Enforcement being sent.

### 1.4 Stages of debt collection

There are several stages to the enforcement process, and fees escalate throughout the process. It begins with Compliance, where debtors will be sent a written Notice of Enforcement and given at least seven days to make contact with the enforcement firm. If they do not, the debt can move to the Enforcement Stage, during which an agent will visit the person’s property. For High Court debts, there is a second Enforcement Stage which applies if the person refuses to make payment, or breaks a payment arrangement. If payments are not made, the agent can sell any goods that have been seized under the TCOG – this is the Sale and Disposal stage.

The graphic below sets out the proportion of cases closed with a payment at each stage of enforcement



Within these statistics are significant underlying differences in practice between the most active firms. For example, for Road Traffic work, the table below shows the average and range for cases closed at each stage:

Stage	Average % closed	Range in % closed
Compliance	38%	17% - 54%
Enforcement	57%	41% - 71%
Sale	5%	0% - 10%

Similar variations are seen within other work types.



# 1.5 Taking away goods and forcing entry

Goods were taken away in 2,624 cases, with clamped vehicles making up 91% of the total.

Entry was forced 25 times – all but one in High Court enforcement, which carries a power to enter premises by force for the execution of High Court debts at business premises.

# 1.6. Identification of vulnerability

A significant number of people who come into contact with enforcement firms and agents are experiencing vulnerability, whether through poor health, major life events, low financial resilience, or reasons such as poor literacy and numeracy skills.

Firms identified vulnerability in 177,618 cases between January and June 2025. Vulnerability was identified in 38% of the cases that were closed at either Enforcement Stage or Sale Stage. Vulnerability led to the return of a case to a creditor in 8% of cases in which vulnerability was identified.

Support was provided in 43% of cases where vulnerability was identified. Support can be defined widely, from sharing information about external debt advice organisations, to providing translators, to referrals to a firm’s own welfare team. In future DRs we may seek more detailed information on the types of support provided.

# 1.7 Assaults on agents

There were 1,535 assaults or threats of assaults on enforcement agents during the period; 184 of these were physical assaults on agents. We know that some of these resulted in the agents requiring hospital treatment.

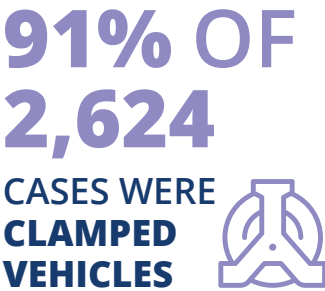
# 1.8 First tier complaints handing

Accredited firms received 4,691 new complaints between January and June 2025. If we compare it to the number of enforcement cases received in the period, this is a complaint rate of 0.1%.

91% of the 4,557 complaints looked at by a firm in this reporting period were dismissed. In fewer than 1 in 10 cases did a firm uphold a complaint, either fully or partially.

Where enforcement firms did uphold complaints, compensation was offered 164 times - 41% of all cases upheld or partially upheld.

Of the 3,394 complaints which arose at firms relating to the enforcement stage, Body Worn Video (BWV) footage was missing in almost 9.5% of cases. Agents are required to wear BWVs under ECB Standard A4, and firms are expected to retain that footage for a minimum of 90 days.



## SECTION 2

# ECB COMPLAINTS HANDLING



## 2. ECB Complaints Handling

On 6 January 2025 we launched our second-tier complaints handling service. Its remit is to consider complaints about enforcement action under the TCOG Procedure from 1 January 2025. Between 6 January and 30 September, we received 515 complaints. 100 met our criteria for investigation, and the remaining 415 were closed. Our complaints process works as follows:

### Initial consideration

At this early stage we decide whether or not the complaint falls within our remit and whether or not the enforcement firm has had a reasonable opportunity to consider it. It is important that enforcement firms are provided with a reasonable opportunity to consider the complaint before it comes to the ECB, as this is usually the most efficient and effective way of resolving matters. If both conditions are met, the complaint moves on to further consideration.

### Further consideration

Here we consider whether the complaint has been put to us in time and whether an alternative dispute resolution forum would be more appropriate, such as a legal remedy or a complaint to the relevant Ombudsmen. If we are satisfied that we are the right organisation to investigate a complaint, we will try to resolve the complaint, either by clarifying the enforcement process for the complainant or agreeing a remedy between the parties.

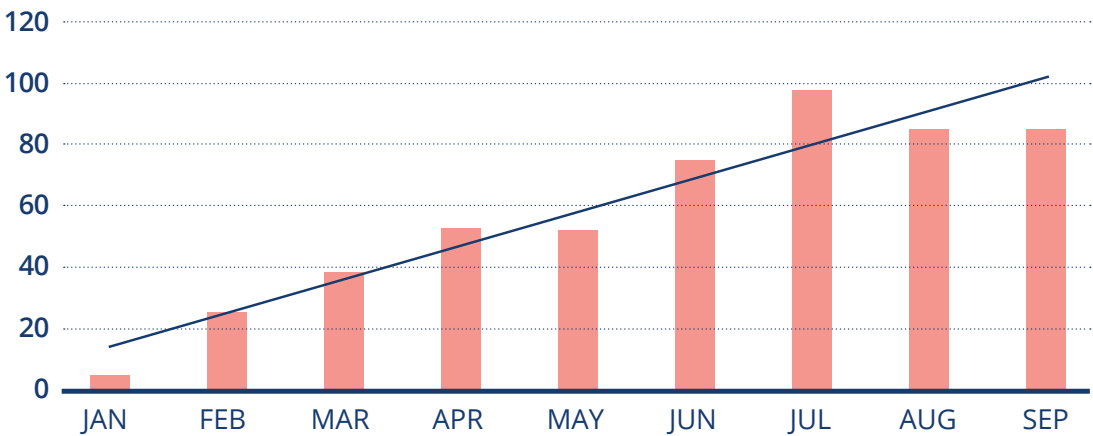
### Investigation

If a complaint has not been closed or resolved at one of the two consideration stages, it may progress to the Investigation stage. Here we request evidence from the parties and take an in depth look at the complaint. We will uphold a complaint in part or in full where we consider something has gone wrong in the enforcement process, and that has had a negative impact on the individual which has not been remedied earlier in the complaints process.

## 2.1 ECB Complaint volumes

Between January and September 2025 we received 515 Complaints.

### Complaints received by month



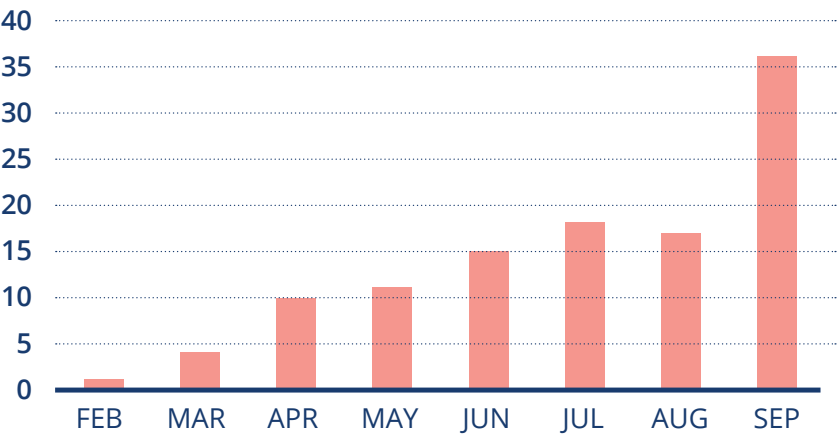
377 complaints were closed at the initial or further consideration stage of the process, meaning we did not investigate further. This was usually because the complaint had come to us prematurely, or because we felt it was not suitable for other reasons. The reasons for closures at initial or further consideration were as follows:

Closure reason	Number
Complaint related to pre-2025 matters	19
Firm not in remit of the ECB's complaints process (typically because the complaint was about a firm not accredited by the ECB, the actions of a Local Authority in-house team or the creditor)	18
Subject matter of complaint not in remit (the action being complained about was not action taken under the TCOG procedure)	26
Duplicate complaint	17
Premature – complaint not yet put to the enforcement firm	90
Premature – complaint not yet completed the complaints process	163
More appropriate for the statutory complaints process	8
Complaint resolved	7
More appropriate for the legal process	6
Complaint was out of time (more than three months from the person becoming aware they have a complaint or one month of the firm's response)	6
Premature – Other (typically cases where we have asked the enforcement firm to take further action to resolve the complaint)	8
Withdrawn	7
Other	2



By 30 September, 152 complaints had completed the further consideration stage. We decided to investigate 112 of those and closed 40 without investigation.

Number of cases accepted for investigation



By 30 September we had completed 38 complaint investigations.

Over half were either upheld or partially upheld or resolved without the need for a formal investigation decision:

OUTCOMES

- Resolution achieved or offered after submission of complaint
- Not upheld
- Partly upheld
- Upheld
- Referred to body for further work



Cases that move on to the investigation stage often involve more than one issue or potential breach. The top five issues complained about in the cases we have closed at investigation are:

Complaint Issues	No of times raised in complaints
Failing to act lawfully and appropriately	24
Failing in statutory or financial requirements	18
Failing in the consideration of vulnerability and ability to pay	17
Failing in complaints handling	13
Failing in taking control of goods	10

2.3 The impact of ECB complaints handling

Through our investigation decisions we ask firms to change their process or procedure where necessary and remind them of the correct process. Firms have also taken the opportunity to review their own processes following the submission of the complaint to the ECB. Where appropriate, we will follow up on recommendations through our Compliance team. The changes and reminders that we have sent are as follows:

2.2 Complaint themes

The complaints we receive are increasingly complex, with people tending to complain about more than one issue. When we first receive a complaint, we capture the main issue, categorised by our Standards for firms and agents. It should be noted that at this stage, we are capturing what is alleged, not deciding whether the complaint should be investigated or upheld.

The 515 complaints received between January and September 2025 were categorised as follows:

Failure to act lawfully and appropriately	202
Failing in the statutory or financial requirements	112
Failure to take account of vulnerabilities	76
Failure to consider affordability to pay	52
Failing in taking control of goods	43
Failure to deal with complaints properly	11
Failing to maintain confidentiality	8
Failure in mode of entry requirements	8
Failure in times and hours of visits	3





Changes / reminders recommended	Number of recommendations
<b>Improvements to complaint handling, including:</b> <ul style="list-style-type: none"> <li>• Providing honest and fair consideration</li> <li>• Communicating in a clear and transparent manner</li> <li>• Addressing all relevant aspects of the complaint</li> <li>• Considering all relevant evidence</li> <li>• Escalation of complaints</li> </ul>	9
<b>Reminders on the enforcement process, including:</b> <ul style="list-style-type: none"> <li>• Time and hours visits permitted</li> <li>• Use of the reseal process</li> <li>• Stopping use of inappropriate threats</li> <li>• Stopping use of forced entry into a property</li> <li>• Application of the 2nd stage enforcement fee (High court)</li> </ul>	6
<b>Improvements to processes for managing vulnerability, including:</b> <ul style="list-style-type: none"> <li>• Escalation of serious calls about a person's well-being</li> <li>• Improvements to communication</li> <li>• Prompt response to declarations and referral to the creditor</li> <li>• Provision of translation services</li> </ul>	5
<b>Use of de-escalation techniques and importance of remaining calm and professional</b>	4
<b>Improvements to consideration of taking control of goods, including:</b> <ul style="list-style-type: none"> <li>• Updating instructions to clarify payments should only be sought from person subject to enforcement</li> <li>• Making sure any evidence provided during a visit to suggest that goods in a property may not belong to the named debtor is given fair and appropriate consideration.</li> <li>• That third party payments are only explored with the agreement of the person subject to enforcement and it is made clear that third-party goods are not at risk of being taken into control.</li> <li>• Reminder on the procedures related to exempt goods (vehicles displaying a disabled badge)</li> </ul>	5
<b>Enforcement visits should not be undertaken when it is known that the body worn video equipment is not working</b>	1

As a result of our work at investigation stage we have provided the following individual remedies to complaints:

In 2026 we intend to review our approach to consolatory payments to ensure the amounts are in line with other oversight and regulatory bodies.

Remedies	Number
Apologies	15
Consolatory payment*	10 (ranging from £50 to £250)
Refund / removal of fees / financial loss	4 (£2,672 in total)
Review of payment plan / affordability to pay	1



SECTION 3

BREACHES OF ECB STANDARDS



# 3. Breaches of ECB Standards

In the majority of cases, agents and firms are adhering to ECB Standards. In 2024 we commissioned independent research which found that agents were complying with the Government's 2014 National Standards in 94% of their doorstep interactions.

We estimate that a 6% breach rate amounts to tens of thousands of people being treated unfairly each year on their doorstep.

Our oversight and complaints work now provides further insight into the most common breaches that are occurring, both on the doorstep and at other stages of the enforcement process.

## 3.1 Lawful and appropriate behaviour

The most frequent complaint we received in 2025 was that either the enforcement firm or the agent had failed to act lawfully and appropriately. We investigated 24 complaints in this category; 16 related to the conduct of the enforcement agent. We upheld 7 of those complaints.

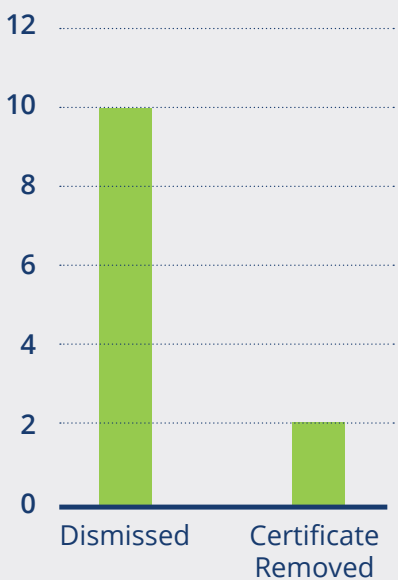
Firms themselves investigated EA conduct 1,557 times between January and June, with 96 investigations finding against the agent. 10 agents were dismissed or had their contracts terminated as a result - around 0.5% of the certificated cohort.

2 agents had their certificates revoked by the Court for enforcement conduct reasons, following an 'EAC2' process. The EAC2 is the process by which an individual – or an enforcement firm – can ask the County Court to consider whether an agent is a fit and proper person and whether they should be allowed to operate.



**We believe that the majority of those dismissed by their firms for enforcement conduct reasons are likely to still be carrying out TCOG work, for other employers.**

**Number of Agents Dismissed for Misconduct vs Certificate Removal**



## ECB Complaints case study: Agent threatens and intimidates couple while enforcing council tax debts

Mr and Ms D were visited by an agent due to council tax debts. The agent spoke briefly with Mr D before Ms D came to the door. She attempted to close the door but the agent prevented her from doing so by pushing his hands against it. Ms D said that she would call the police but was told that if she did so, she would be arrested for obstructing an agent. Body worn video footage also captured the agent banging loudly on Ms D's door and window, and laughing at her on several occasions.

We considered that the agent had breached several ECB Standards for Agents. AS1.5 states that agents must not use force to enter a property, including using their body to stop a door from being closed on them. The agent's comments regarding Ms D being arrested were in direct contravention of AS1.22.6, which says that agents should not falsely imply or state that refusing entry to a property is an offence. In addition, several of the agent's actions and comments during the interaction were threatening and intimidating.

The firm's handling of the complaint failed to identify the full extent of the failings within the visit and they failed to review the evidence that Ms D was able to provide to us. We upheld the complaint and the firm issued an apology and a consolatory payment.

**Our Compliance team investigated an instance of misleading communications from a firm, where we found that a template text message had overstated actions that could be taken.**





## ECB Compliance issue case study: Misleading communication from a firm

The ECB was made aware of a firm sending misleading SMS communications to debtors. The SMS wrongly threatened bankruptcy when this was not an available escalation route. ECB Standard FS2.8.3 states that communications, including text messages, must be appropriate and should not be “misleading or untrue in terms of the powers of an enforcement agent or an enforcement firm or in terms of the stated timescales within which action may be taken.”

The firm was contacted and asked to explain why the SMS had been sent, and to provide further details on how communications are controlled to ensure they meet ECB Standards and expectations.

Following our intervention, the firm acknowledged that the message could be misleading, changed the message content and confirmed that they had reviewed other communications of a similar nature. In addition, communications will now only be sent after approval by a senior member of the team to ensure the content is correct and appropriate.

### 3.2 The Taking Control of Goods Process

We considered 10 complaints at investigation stage that relate to the Taking Control of Goods process. 4 of those related to the enforcement agent either threatening to take control of, or actually taking control of, an item that is exempt from being taken into control (ECB Standards for Agents AS1.11).

We upheld those 4 complaints, 2 of which were about the clamping of vehicles displaying a disabled badge.



## ECB Complaints case study:

### Agent clamps a vehicle displaying a blue badge

An agent visited Mr E's property to enforce an unpaid PCN. Mr E's vehicle was parked and displaying a blue badge. The agent saw the badge and took a photo of it before clamping the vehicle. Mr E explained that the blue badge was his and correctly pointed out that the vehicle couldn't be taken into control. However, the agent argued that the vehicle was not being used for disability purposes at the time as the relevant clock was not on display. Mr E's car was immobilised for 2 days and he incurred expenses as a result.

The enforcement firm's complaints team did refund his expenses but refused to accept that the vehicle had been clamped in error. They argued incorrectly that a vehicle displaying a blue badge could be clamped if there was no proof that the vehicle was on Motability finance, or it did not have relief from Vehicle Excise Duty.

We considered that both the agent and the firm should have been aware that vehicles with a blue badge cannot be clamped. As a result of our investigation the enforcement firm provided a full apology for the error and increased its existing consolatory payment for inconvenience and frustration. We also recommended that the enforcement firm updated its instructions to its own complaints team and enforcement staff so that all staff are aware a vehicle is exempt from being taken into control where it is displaying a blue badge.





### 3.3 Statutory and Financial Requirements

We considered 18 complaints relating to the statutory or financial requirements around enforcement. 7 of those related to issues in receiving the Notice of Enforcement. We didn't support any of those complaints.

We upheld 3 complaints in this category and 2 of those related to the application of the 2nd Stage enforcement fee of £495. In both cases we found that the 2nd stage enforcement fee had been applied incorrectly and the complainants were refunded.



#### ECB Complaints case study: Agent uses threatening and intimidating tactics and escalated fees

An agent visited Mr and Mrs F to enforce a writ of control. The couple have a porch on their property and the agent used his body to keep the first door to the porch open. With a degree of pushing and shoving he then gained access to the hallway. We considered that the agent had not gained peaceful entry as required by AS1.5 of the ECB's Standards.

Once inside the property the agent told Mr and Mrs F that he would take photographs of the whole house. He took photos of a number of goods, including those which could not be removed such as a bed and a dining table, and told Mrs F that if they did not settle the debt, they would lose everything. We considered this an implied threat to take exempt goods that cannot not be removed, contrary to AS1.11 of the Standards.

During the 30 minute visit Mr F was not asked if he wanted to make payment but the agent moved to the second stage of enforcement, applying the additional 2nd stage enforcement fee of £495 and the sale or disposal fee of £525, plus 7.5% of the total debt. The process and the stages of enforcement were not explained, and the agent did not take any goods into control, despite adding the fee.

We concluded that neither the sale or disposal fee nor the 2nd stage enforcement fee should have been added. While the firm had removed the sale or disposal fee prior to the complaint coming to us, the 2nd stage enforcement fee remained, which was not satisfactory. As a result of our investigation the firm removed the 2nd stage enforcement fee and paid a consolatory payment for the upset the visit had caused. This case resulted in a referral on to our Compliance team.

### 3.4 Linking of debts

The largest compliance issue we have investigated - an ongoing case - relates to a breach of ECB Standard FS1.6. Under this Standard, firms are required to:

*"have a system which links multiple debts owed by the same person so that, after charging the compliance fee, only one set of fees are charged where the activity that generates the fee can reasonably be carried out at the same time."*

This Standard echoes Regulation 11 of [The Taking Control of Goods \(Fees\) Regulations 2014](#) and is designed to ensure that people are not charged multiple enforcement fees (of £235 each) when multiple debts could reasonably be enforced in a single visit.

In April 2025 we became aware that a large accredited firm had been overcharging members of the public with multiple debts over a number of years. In line with our requirements, the firm also self-referred to the ECB.

Following significant work, a comprehensive Supervised Action Plan was put in place. This included commitments to refund everyone who had been overcharged; to commission an independent investigation to determine the root causes of the issue; and to put in place a full remediation plan to address the causes and ensure the overcharging cannot re-occur. We continue to monitor and assess progress in delivering this action plan.

To ensure that overcharging issues are not happening more widely in the industry, the ECB is conducting a Thematic Review of fee charging across a sample of firms. We have selected a mix of small, medium and large firms to allow for a balanced view across industry. This work is currently underway with conclusion of the work expected to be in early 2026.





### 3.5 Responding to vulnerabilities

Vulnerability was a core component of 17 cases that we investigated and we upheld 4 such complaints. In 2025, those complaints were assessed against the Ministry of Justice's National Standards. In 2026 we will publish new Standards on Vulnerability for firms and agents, to be fully implemented by the end of the year. This will include guidance to address the issues that we have encountered through our complaints and compliance work.



#### ECB Complaints case study: Poor handling of serious declaration of vulnerability

Mr A received a compliance letter from a firm due to Council Tax debt. Mr A and his representative contacted the firm to let them know about his serious mental health vulnerabilities, which included a history of substance misuse, self-harm and a previous suicide attempt. This information was supported with medical documentation.

The firm declined to engage with Mr A's representative for several weeks because their own authorisation form had not been completed. Mr A did provide written confirmation that the representative was supporting him, but this was not accepted. The firm did not respond when a payment offer was made by the representative; delayed the arrangement of a welfare assessment; failed to signpost to advice; took five months to make the creditor aware of the situation; and failed to communicate sensitively with Mr A.

During this time an enforcement visit took place, and number of text messages were sent that the ECB deemed unsuitable for a person experiencing the level of vulnerability that had been evidenced in Mr A's case.

We upheld the complaint, which resulted in an apology from the firm and consolatory payment. The firm has made changes to its processes in response.



#### ECB Complaints case study: Agent shouts at elderly couple with vulnerabilities

An enforcement agent visited the address of Mr and Mrs B. The address matched the address on the warrant of control, but it was a relative C that was subject to enforcement, not the couple themselves.

The agent was provided with evidence to show that it was Mr and Mrs B's property, and the agent confirmed this with C on the phone. Despite this, the agent said that he would return to remove goods if the debt was not paid by that evening, contravening ECB Standard AS1.23. This Standard states that agents cannot take payment from another person unless they have explicitly agreed it with the person subject to enforcement. Mr B requested a translator and there were indicators that he had not fully understood the situation. He also explained that his wife needed to leave to attend a medical appointment, indicating potential vulnerabilities. The agent asked to see evidence of the appointment before he would allow them to leave their property.

As the visit progressed Mrs B became extremely distressed. The agent became frustrated and the body worn video captures him shouting and swearing at Mrs B while she was visibly and audibly distressed. Mrs B sought medical attention following the visit.

We considered that when the firm responded to this complaint and reviewed the body worn video, they failed to address the pertinent points and did not pick up on Mr and Mrs B's lack of fluency in English.

We upheld the complaint, which resulted in an apology and consolatory payment. We also followed up with the firm to review other footage of the agent in this case to determine what other steps might need to be taken.

### 3.6 Handling of Complaints

The ECB Complaints teams considered 13 issues related to firms' complaints handling. We upheld 6 complaints and resolved 2 others that related to the accessibility of the complaints process itself.

We investigated 5 complaints that the firm had failed to undertake a fair and proportionate investigation of the complaint and upheld 4 of them.



## 4. Next Steps

Following the publication of this report, the ECB will run a number of workshops for enforcement firms and agents to discuss the findings in more detail and share learning.

We will also be expanding our Complaints team in 2026 to meet the growing demand. Our recruitment plans will be covered in the ECB Business Plan 2026/27, which we will consult on in February and March 2026.

We intend to publish an Insights Report annually, as well as an Impact Report each Spring.

We would like to thank and acknowledge everyone who has fed into the creation of this report.



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