



ENFORCEMENT
CONDUCT
BOARD

ECB DRAFT / FEBRUARY 2026

BUSINESS PLAN 2026/27



Our Mission

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

Chair's Foreword

We have made significant progress towards our mission over the last year.

We have finalised our full set of new standards for fair enforcement by introducing the crucial elements relating to vulnerability and ability to pay.

We have brought more enforcement firms under our oversight, extending our reach to over 97% of the market.

We launched our independent complaints adjudication service and have already closed over 700 complaints, providing remedies to those who we have found to be unfairly treated.

And we have launched our compliance function, which immediately addressed a significant case of fee overcharging impacting many people. We made sure that people overcharged were reimbursed, and that lessons were learned and improvements made in the firm to ensure that nothing similar can occur in the future.

The recent launch of our first ever Insight Report was a big milestone. This provides reliable, independent evidence on the scale of the industry and the types of non-compliance that are occurring. It sets a new baseline for the sector and shows why independent oversight is so important and where further work is urgently needed to ensure fair treatment for everyone who experiences enforcement action.

Recognising the progress the ECB has made, the Ministry of Justice has now committed to give the ECB legal powers, which will ensure consistent protection for the public and secure the longer-term future of oversight in this important sector.

It is against this backdrop that we are setting out our draft Business Plan for 2026/27. The main focus is on further development of our operational functions to ensure we are able to respond to the risks that we are seeing in a targeted and effective way. This means building our capacity to reflect the reality of the number of complaints and the scale of non-compliance we are seeing. It also means a strong focus on efficiency and ongoing improvement, taking advantage of the learnings available from our first year of operation to ensure we are delivering impact in a targeted and proportionate way.

This year we also plan to push further into influencing positive creditor behaviour, to provide upstream support for enforcement firms in delivering effective and fair enforcement services. At the moment, we see a very mixed picture, with some admirable creditor behaviour alongside some harmful practices. We will seek to shine more light on this, in the interests of fair enforcement.

As ever, we look forward to working closely with stakeholders from across the sector and beyond as we make further progress in pursuit of our important mission.

Catherine Brown

Chair, Enforcement Conduct Board

Progress so far

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



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.



The ECB was formally launched in November 2022 and the Executive team started from March 2023.



The ECB became operational across all of its main functions from the start of 2025 and by the end of the financial year, the team will comprise 13 (12.2 FTE) members of staff.



The ECB has oversight of 45 accredited firms, which we estimate accounts for at least 97% of the whole market.

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 significant 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.

2025/26 – progress against five key priorities

Our 2025/26 Business Plan set out five key areas of focus to support achievement of our mission. Below is an overview of the key achievements in each area during 2025/26.

1) Setting a new bar – clear and comprehensive standards

- Consulted on and developed new standards on how enforcement firms and Enforcement Agents should handle vulnerability and financial vulnerability – two key areas that were highlighted in the initial blueprint for independent oversight
- Commissioned and published qualitative research on vulnerability and ability to pay with people with lived experience of enforcement and with Enforcement Agents themselves
- By the end of the financial year we will have delivered new standards on vulnerability and ability to pay.

2) Delivering a high quality complaints service to the public

- Our complaints service was launched in January 2025 and we started to receive, investigate and adjudicate complaints from members of the public. By the end of January 2026, we had closed 670 complaints from members of the public. We had concluded over 70 investigations and upheld over half of these.
- We have agreed MoUs with other complaints bodies with overlapping remits, including the LGSCO, PSOW and HCEOA.

Demand for complaints has been significantly higher than we anticipated when we set the scheme up. Our modelling was based on the proportion of complaints that were being escalated to the CIVEA CARE Panel, HCEOA and ombudsmen schemes in previous years. Whilst we allowed for a significant uplift from these numbers, the actual uplift has been much greater than expected. We believe that this is largely due to the changes we have made to reduce the number of stages that a complainant needs to go through before being able to access independent adjudication of their complaint. To address the higher demand, we have recruited a larger complaints team with more capacity and resilience, securing people with deep experience of complaints handling in the enforcement industry and other sectors.

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

- Our work programme in this area was reprioritised as a result of identification of a major overcharging issue at a large enforcement firm (Marston Holdings). In response to this, we:
 - Undertook significant work with Marston Holdings. This included development of a Supervised Action Plan setting clear requirements in relation to refunds for people who had been overcharged, independent investigation of the root causes of the breaches and a comprehensive remediation plan to ensure that it is never repeated. We continue to monitor delivery against this action plan.
 - Developed and launched a Thematic Review into overcharging to establish if overcharging was occurring more widely across the sector. This involved undertaking supervision visits to 10 firms. This is the first time that the ECB had visited firms for oversight purposes. A report on this review will be published by April 2026.
- We successfully delivered the first and second full rounds of our new Data Return process for accredited firms, where they submit evidence to us across a large number of different data points. This has helped to build evidence on the sector overall, as well as starting to identify risk factors and indicators to help us to target our resources in the future.



4) Building the long-term sustainability of independent oversight

- The third re-accreditation process was successfully delivered, with additional firms coming on Board to further increase our reach.
- Secured a commitment from the Ministry of Justice to bring forward legislation to put the ECB on a statutory footing, ensuring that everyone who experiences enforcement action would be able to rely on the same safeguards and protections.

5) Engaging and influencing creditors

- We stepped up our engagement activity with creditors, with a particular focus on parking and road traffic enforcement. We spoke at a wide range of events, including the IRRV regional forums all across the country.
- We opened up our accreditation scheme to in house enforcement teams at Local Authorities and have now accredited 10 teams across England and Wales, further increasing the coverage of our oversight.

In January 2026 we published our first Insights Report (ECB-Insight-Report-2026-1.pdf) which presents data on the industry, breaches of our standards that we have identified so far and evidence on the operation of our complaints handling scheme. This sheds further light on the progress and achievements of 2025/26 and represents an important step forward in establishing a robust evidence base on practice across the sector.

Priorities and deliverables for 2026/27

The ECB has made significant progress against the five priority areas outlined in our last business plan.

For 2026/27, we will be focussing on ongoing development and delivery of operational oversight and complaints handling, to ensure that the public continues to receive increasing benefits from our oversight.

For 2026/27, our work will be focused around five key areas.

1) Continuing to raise the bar on fair enforcement

- Developing and delivering Guidance and good practice examples to supplement our new Vulnerability and Financial Vulnerability standards
- Developing and delivering Guidance on linking fees and application of sale fees – applying findings from our thematic review on overcharging to provide greater clarity, consistency and protection for the public.
- Commissioning research looking into the demographics of those who experience enforcement action, to develop understanding of which groups might be disproportionately impacted and how this might feed in to our oversight.

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

- Scaling the team up to handle the level of complaints we anticipate to receive next year, taking account of the current run rate and trends.
- Delivering a series of workshops with industry on data and findings from complaints, to help drive improvements in service delivery and first tier complaints handling
- Undertaking a Process and Efficiency Review of our complaints handling rules, process and operation. This will take account of lessons and data from the first full year of operations and will identify any changes required to ensure we are handling complaints in the most proportionate and cost-effective way possible. This will be carried out early in the year, as we expect the number of complaints to the ECB to continue to build over time.

- Developing and delivering a “Guide to Remedy”, explaining what we will consider when determining the type and level of remedy that should be applied for upheld complaints.
- Reviewing our process for handling complaints about the ECB and scope for introducing some external involvement in this.
- Collecting and analysing demographic data from those who complain to us.

3) Impactful oversight and monitoring of the market

- Developing a risk assessment framework for assessing the profile of accredited firms and helping to prioritise where we target our resource.
- Developing incoming intelligence triage and categorisation, including breach reporting process with potential enhancements to self-assessments
- Delivering a pilot visit programme, applying the learning from visits undertaken as part of the Thematic Review of Overcharging in 2025/26
- Post implementation assessment of compliance with the new Vulnerability and Ability to Pay Standards
- Delivering two further Data Return processes and increasing our ability to analyse the results
- Publishing our second Insight Report, sharing evidence on the market and what we have found through oversight.

4) Building the long-term sustainability of independent oversight

- Working with the Ministry of Justice to deliver on its commitment to set the ECB on a statutory footing, ensuring that everyone who experiences enforcement action can rely on the same protections and safeguards.
- Investigating options for introducing some elements of “polluter pays” charging to our model, so that firms who require disproportionate oversight time and resource would pay more towards our costs than those who do not.

5) Influencing creditors

- Delivering our strategy and action plan for driving positive creditor behaviours that support fair enforcement and shining a light on poor creditor behaviours that can make it more challenging for enforcement firms to deliver fair enforcement.

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.

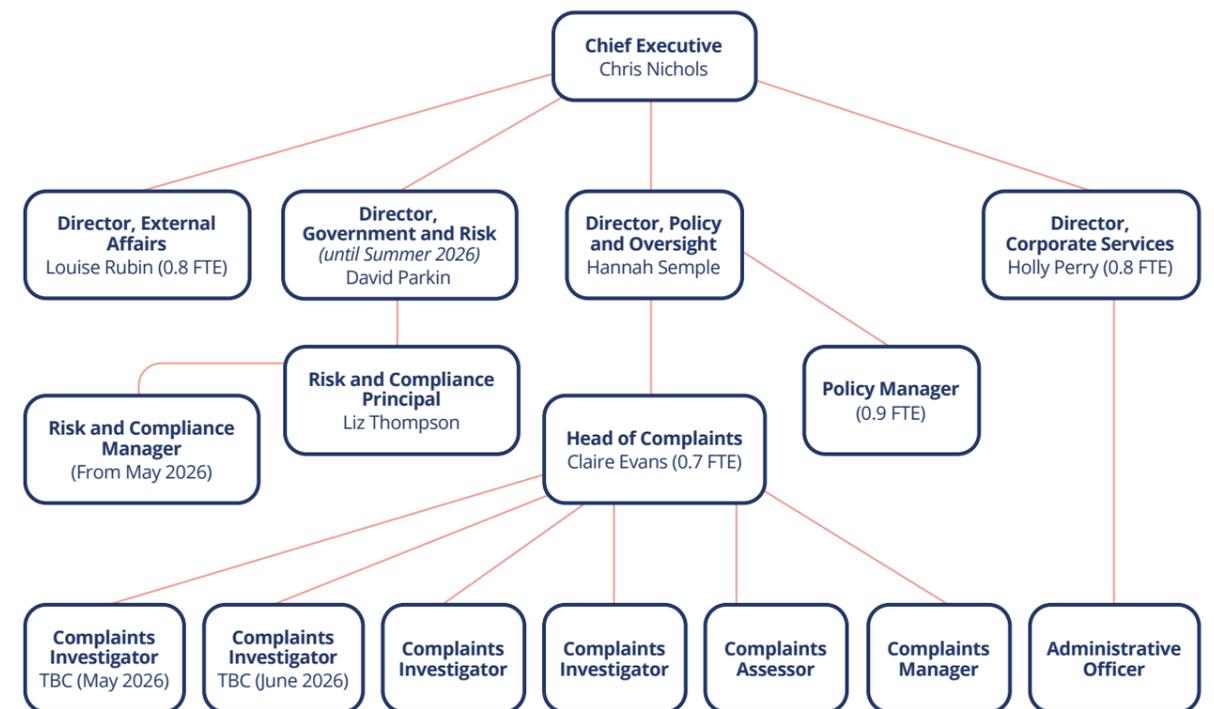
They are:

- Independence
- Ambition
- Proportionality
- Collaboration
- Transparency

The ECB Team

To deliver this business plan the ECB Team will grow to 15 members of staff, translating to 14.2 FTE (from Summer 2026).

The organigram below shows the structure of the team.



The additions that we have made to the team over the past year have continued to show market interest in working for the ECB, with a series of strong fields of candidates for each role we have recruited to. We now have three members of the team who have come direct from Enforcement firms, with significant experience in the sector between them. These colleagues complement the deep existing experience that we have across regulation, complaints handling, audit and policy. We have colleagues with a background in central government, debt advice, Local Authorities and regulatory and ombudsman services.

We plan to continue to work as a remote organisation, with a monthly day where the team will come together.

Budget

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

The budget to deliver this business plan is approximately £1.96m. This compares to a budget of £1.4m for 2025/26

The main headline costs in the budget are as follows:

Main categories of spend	Budget assigned (rounded up)
Staff costs (full costs including pensions and NI)	£1.3m
Board member costs (full costs including NI)	£135k
Travel meeting rooms and expenses (including staff and board meetings)	£83k
Legal fees	£60k
Complaints scheme (IT, expert panel, phone system)	£45k
Professional fees and insurance	£74k
Research	£40k
Communications and external affairs	£15k
Recruitment costs	£33k
Training	£35k
IT and systems	£49k
Enforcement industry expert consultancy	£10k
Contingency	£94k

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.

The budget for this year has increased compared to previous years. This is the first year in which we are able to develop our workplan and resourcing requirements based on evidence on both the emerging volumes of complaints that we will need to handle and also the emerging evidence on the level and types of non-compliance that is occurring in the market.



We have developed our resourcing plans based on the findings of our recently published Insight Report. This evidence suggests:

- That we expect to be receiving 1,200-1,500 complaints next year and investigating 400-600. Our existing Complaints Team should be able to handle capacity of 240-300 investigations and therefore our resourcing plan provides for two additional Investigators to be recruited to provide additional capacity. We are also expecting the Process and Efficiency review of complaints to establish what other efficiencies are possible to increase our capacity within existing resources.
- Whilst the large majority of enforcement action appears to be compliant with our standards, we are finding a number of material examples of non-compliance that need to be addressed in order to protect the public (and the reputation of the industry). We need additional capacity in the oversight team to ensure we can address this.

We are not planning to build our staff capacity at Senior Leadership levels, or to build any further capacity in policy.

We will remain an agile, remote organisation, without the costs of maintaining an office.

The draft budget has a 5% flexible contingency provision. During 2025/26 we did not provide such a contingency and, as a result of external factors beyond our control (mainly the high demand for complaints, as well as the oversight issue we encountered), we ended up slightly overspent on our budget.

The Board has therefore determined that a contingency should be included in the budget to ensure that we are able to respond to any emerging, essential resource requirements that arise during the year as a result of external factors.

This budget will result in a levy of [0.7%] of firms' turnover from TCOG work fees.



ENFORCEMENT
CONDUCT
BOARD

Enforcement Conduct Board

Office 605, Albert House,
256-260 Old Street,
London EC1V 9DD

in enforcement-conduct-board

www.enforcementconductboard.org