

ECB Board Meeting – 21 and 22 January 2026

Venue: The Maid's Head Hotel, Norwich NR3 1LB

Member attendance: Catherine Brown (Chair), Alan Cavill, Delroy Corinaldi, Althea Efunshile, Caroline Wells, Chris Nichols (CEO)

Apologies: Gerard Curran

In attendance: Leonora Miles, David Parkin, Holly Perry (minutes), Louise Rubin, Elizabeth Thompson (via Teams)

Minutes

Item 1: Welcome, apologies and declarations

1. The Chair welcomed all present, particularly Delroy Corinaldi who was attending his first Board meeting since his appointment on 1 January 2026. Apologies had been received from Gerard Curran, whose written comments would be fed into discussion at the appropriate points.
2. There were no new declarations of interest.

Item 2: Minutes of the previous meeting

3. The minutes of 26 November 2025 were **agreed** as an accurate record of the meeting.

Item 3: Matters arising

4. In terms of matters arising not on the agenda, the Board requested an update on the judicial review proceedings that had been reported at the last meeting – the ECB had submitted papers explaining why the case should be dismissed, and a permissions hearing had yet to be held. The Board would be kept informed of progress.
5. The Board **noted** the action tracker and Board forward agendas. Opportunities would continue to be sought to report on the difference that ECB interventions were making; the action related to this work would be refreshed to focus on process, impact and timing of such reports and opportunities to fold them into existing plans (e.g. launch of the business plan consultation) (**actioned**). Regarding the action relating to the 'guide to remedy', the Board noted that remedies had not been set at a high deterrent level – remedy work would be pushed to later in the year, once the resource and workload in the complaints team had stabilised. The action would be

updated (**actioned**). Actions 1, 5 and 8 would be closed, and it was implicit that AI would be reviewed as part of the complaints process review (**actioned**).

Item 4: Chief Executive's report

6. The Chief Executive presented the paper, reporting that the launch of the Insights Report earlier in the week had been a significant milestone for the ECB, and had involved most of the team in some form. There had been press interest, including from BBC Radio 4's *Moneybox*, and the report would also be the focus of an event in Parliament the following week – an All-Party Parliamentary Group, taking place on 26 January at which ECB would be speaking.
7. The Chief Executive provided an update on the complaints team resource – two recently-joined members were performing very well and making an immediate difference to the workload. A further Complaints Investigator who had been due to join in early March had withdrawn, and so the ECB would be going back out to advert for the role shortly.
8. The following points were raised in discussion:
 - i. There was no further update on the timeline for statutory powers. Nor was there an update on timeline for the 5% fee increase. The Government continued to be committed to statutory underpinning, and the ECB continued to work on the basis of a Bill in 2026. Earlier in the week, the ECB had written to the Prime Minister, Deputy Prime Minister, Chair of the Justice Select Committee and Minister Sackman, attaching a copy of the Insights Report.
 - ii. The work on the Thematic Review of firms by the oversight team was nearing completion, and the final report would be presented to the Board at its 4 March meeting.
 - iii. The Board discussed the position relating to a firm that was likely to withdraw from accreditation. The firm had been struggling, and losing contracts, and this was perhaps evidence of consolidation of the market. The Board noted that without accreditation, there would be a risk to the public and this pointed to the need for statutory underpinning without delay. There were also questions to be raised with creditors, where a firm was considering withdrawal. Influencing creditor behaviour would be an increasing focus for the ECB in 2026/27, particularly engagement with local authorities.
 - iv. The Board congratulated the team on the production of the Insights Report, which was an impressive and important piece of analysis.
9. The Board **noted** the Chief Executive's report.

Item 5: Draft Business Plan and Budget 2026/27

10. The Chief Executive presented a paper setting out the ECB's draft budget and business plan 2026/27 for consideration. The version being presented took account of the Board's feedback at the last meeting. Subject to the Board's further reflections, the ECB would consult during February and early March, and return to the Board in April with a final version for approval. The final draft budget for 2026/27 stood at £1.96m, up from around £1.4m in 2025/26, an increase of around 40%. The Chief Executive would begin a round of one-to-one meetings with the CEO of the largest firms in early February, to explain the background.
11. The following points were raised in discussion:
 - i. In relation to turnover figures, the ECB had written to all firms earlier in January to request data for 2025. The levy would be applied to the turnover figures for 2025, and it was possible that by the time the ECB consultation went live, more would be known about turnover levels.
 - ii. References would be made in the consultation to the number of complaints received by the ECB, and how this was much higher than had been expected. Significant additional in-year resource had had to be secured in 2025/26, which had an impact on the required staff resource going into 2026/27, and further recruitment was still needed to meet demand. The efficiency review would be important in shining a light on any areas where improvements could be made in the process – a key piece of work planned for 2026/27. The Board asked for a focus on cost per complaint and suggested exploring the cost per complaint of the previous CIVEA system as a benchmark (**action**). Value for money points in the ECB's approach to complaints handling would be made in the foreword to the business plan, where comparable data was available (**action**).
 - iii. One Board member considered that there was an argument that firms were also experiencing an increase in complaints – possibly driven by AI, though the ECB had pushed hard for greater openness and transparency in complaint handling by firms.
 - iv. Accepting that inflation (postage, heating, rent and rates) were likely to be impacting firms, on balance, the Board felt that the rationale was clear for the amount of business that the ECB needed to deal with in 2026/27, and the proposed budget supported this.
 - v. Opportunities to reference the ECB's stakeholder engagement work would be sought – perhaps in the foreword – as well as opportunities to say what the ECB would be doing in the year ahead in this space. Influencing creditor behaviour would also be emphasised more strongly – this would be a key piece of work starting in 2026/27, and an outline paper would be brought to the Board in March (**action**).

12. The Board **agreed** the draft business plan and budget 2026/27, and accompanying consultation document as the basis for public consultation, subject to the points raised in discussion, and would review and approve the final version in April 2026.

Item 6: ECB Standards on Vulnerability and Ability to Pay - final draft Standards and consultation update

13. The Policy Manager presented the paper, and explained that the ECB was now at the penultimate stage of the process, with the final version of the standards for sign off to be presented to the Board on 4 March. The drafting had developed significantly since the Board had last seen the draft standards, however the ambition and framing of the narrative had not shifted. The definition of 'vulnerability' had changed, and the standards for 'ability to pay' had been folded into those for 'vulnerability' so that there was now a single set of standards. The paper outlined the main changes to the standards, and the key points from the consultation responses.

14. The following points were raised in discussion:

- i. The Board were overwhelmingly in support of the changes, with support for the precision and clarity that was emerging, and the drafting having navigated well the tensions between the responding groups. While the changes had been substantial, they did not change what the ECB was seeking to achieve.
- ii. The Board discussed how the Standards relating to third parties would work in practice, noting that they would not always be in the room if the person experiencing enforcement contacted them by phone, and there was a need to better understand how the 'observable indicators' would work. Issues raised in the consultation were also discussed including that the agent's main focus should be on the person experiencing enforcement, as well as concerns relating to GDPR compliance in soliciting or sharing information with or from third parties.
- iii. The shorter definition of 'vulnerable' was felt to be more accessible. There could, however, be greater clarity on the concept of 'harm' – with the emphasis perhaps being that vulnerable people should be subject to 'no more harm' as part of the enforcement process than those who were not vulnerable. There was nuance here, as the Standards placed discretion on EAs in relation to identifying and making judgements on harm and acceptable living standards. Their role involved skill and judgement, and training and support would be critical to enabling them to fulfil the requirements of the Standards in these areas. During the implementation period, the ECB would develop guidance and best practice material which would also assist.
- iv. The temporary nature of many vulnerabilities was noted, along with terminology used in other sectors to avoid customers being driven away by being labelled or asked if they were vulnerable, including 'people in

vulnerable circumstances' or 'people experiencing vulnerability'. It was suggested that the ECB's approach should align with the social model of disability.

- v. There was a sense that there was more divergence between those responding from the enforcement sector, and those responding from the debt advice sector, with the latter taking an increasingly robust line. The industry responses were, overall, constructive.
- vi. The approach to the Standard Financial Statement¹ (SFS) was discussed, recognising that in its current form the SFS was not recognised by enough local authorities. It was noted that while there were some shortcomings of the SFS in its current form, and that it was not built for use by the enforcement industry, there were other workable models which aligned with it. It was agreed that working with debt advice and industry to agree a single, accepted approach to assessment was vital in the long-term. This was also felt to be an important lever for the creditor influencing work.
- vii. The Board noted its disappointment with the IRRV at a national level for not engaging with the consultation on the Standards in a constructive way. Relations at a local level were however positive, and the ECB would continue its engagement with the regional IRRV workshops again in 2026.
- viii. Once finalised, the standards needed to be shared with creditors, so that they were aware of the requirements, and it was proposed that the development of a protocol with local and central government (perhaps based on the example in Wales) should form part of the creditor-influencing strategy.
- ix. In terms of the final standards, it was suggested that a visual representation might be helpful – creating a slide or diagram of the touchpoints.
- x. The Board discussed the issues in relation to training enforcement agents on the new standards, which would be necessary during the implementation period. While this was squarely a role for the firms themselves, the ECB would want to be helpful and share expectations and thinking on the preparation and training required; it would be the firms' role to communicate the Standards effectively to EAs and for them or other providers to design and deliver training. The ECB would not accredit training but would have a role in continuous development by identifying and sharing good practice through its oversight work.
- xi. In terms of timing and process from here, it was confirmed that the lived experience research would be circulated to the Board ahead of the 4 March Board meeting, with the final standards and report on the consultation to be considered and approved at that meeting.

¹ The SFS is a tool for summarising an individual's income, expenses and debts, used primarily by debt advice professionals in the UK to help people in financial difficulty.

15. The Board **agreed** the latest draft of the revised standards and definitions, and looked forward to considering the final draft for approval on 4 March.

Item 7: [ITEM REDACTED]

Item 8: [ITEM REDACTED]

Item 9: AOB

16. There were no other items of business.

Item 10: Reflection section

17. The Board reflected on the meeting and agreed that it had been a productive meeting with high quality papers.

Private session

18. The Board met for a private session, for which there were no papers.

Stakeholder session

19. The Board met the following day with representatives from industry, debt advice charities and creditors to discuss '*working together for fairer enforcement*'.