

The ECB's proposed vulnerability and ability-to-pay standards

**Report on reflections of people with
lived experience of enforcement**

January 2026



REVEALING REALITY

Executive summary

People with recent experience of debt enforcement were broadly supportive of the proposed vulnerability and ability-to-pay standards.

This was largely because they felt these would address shortcomings in their own often negative experiences of enforcement. Participants believed the standards could make enforcement feel more personalised, less intimidating, and easier to navigate. Some explained that they supported the proposed standards as they thought they would help to reduce or even negate their debt. In particular, the proposed approach of clearer communication, better-trained agents, and fairer, more sustainable repayment plans would support this. Overall, participants felt the proposed standards would improve consistency, proportionality, and fairness in enforcement.

There was strong support for resolving debts earlier in the process, although many acknowledged barriers to this.

Participants agreed that they would have preferred to have an opportunity to resolve their situation earlier in the process. However, many acknowledged barriers to early engagement, including avoidance, confusion, and communications perceived to be inaccessible or intimidating. Others felt that their attempts to communicate with firms ahead of an enforcement visit had been unsuccessful.

Many participants claimed to be willing to share personal information as evidence of vulnerability or inability to pay.

Many participants said they were willing to share information about their vulnerability or finances where this clearly led to practical benefits, such as avoiding escalation or agreeing manageable repayments. They did, however, express concerns about privacy and having to repeat information. There were more concerns over sharing financial information than medical information, as it was thought that this could result in scrutiny of their spending habits and payment plans resulting in a lower standard of living.

Some participants were happy for their data to be shared across organisations to streamline disclosure of vulnerability or inability to pay.

A few participants expressed a belief that personal information was already being shared across organisations, particularly information that the government had access to around their income. Many approved the idea of data sharing so that they could avoid having to disclose their circumstances multiple times. However, a few noted that they would only be comfortable with this information being stored for the duration of their case but would feel concerned about having a vulnerable time in their life recorded indefinitely.

There were mixed responses to being signposted to free debt advice.

A few participants felt that this would have been appreciated during their own experience, as they had resorted to looking online. Others expressed doubt about how far they thought debt advice organisations would be able to help, either due to resourcing issues or a perception of what these organisations offered.

Introduction

Enforcement is a necessary part of the debt recovery process, but it frequently involves people living in complex and challenging circumstances. Enforcement agents are required to exercise judgement, skill and sensitivity when navigating difficult interactions, often in real time and with limited information.

As part of its remit to ensure that people experiencing enforcement are protected from poor practice, the Enforcement Conduct Board (ECB) has been drafting a new set of vulnerability and ability-to-pay standards for enforcement work. To inform this process, the ECB has conducted an industry consultation. This has involved commissioning Revealing Reality to engage both enforcement agents and people with experience of debt enforcement to understand their views on the thinking underpinning the proposed standards.

The research was designed to address the following objectives:

- To explore how people with experience of enforcement understand and respond to key concepts within the draft standards, particularly vulnerability, ability to pay, and sustainable repayment.
- To understand the practical challenges that enforcement agents face identifying and responding to vulnerability and financial difficulty, and to test how the proposed standards could work in practice from their perspective.
- To identify examples of good practice, dilemmas, or unintended consequences that may arise when operationalising the new standards across different enforcement contexts and circumstances.
- To generate insight that informs the Enforcement Conduct Board's development of accompanying guidance, ensuring the standards are fair and protective in principle, and workable and effective in delivery.

This report presents findings from the research with people with experience of enforcement.

Methodology

This qualitative research explored how people with experience of enforcement reflected on the key principles underlying the Enforcement Conduct Board's discussion paper and direction of travel on vulnerability and ability to pay. The aim was to examine the underlying concepts and assumptions, and how these resonated with participants' experiences of enforcement, rather than testing specific wording.

The discussion materials were drawn from the ECB discussion paper developed for wider engagement and industry consultation. Stimulus was produced to share practical steps that both firms and agents would be expected to take in line with the new thinking, which was grouped into themed 'principles' by the research team. This enabled the research to prioritise topics and focus on the issues that mattered to people.

Fieldwork comprised six focus groups with people who had experience of enforcement within the past two years, involving a total of 35 participants. Not all participants had experienced a doorstep visit; some had resolved their case at the compliance stage. Two groups focused on people who were unable to pay, including those on low or unstable incomes and unable to afford essentials. Four groups focused on people experiencing different forms of vulnerability, including visible disabilities, hidden disabilities, low resilience

(related to factors such as digital exclusion, low literacy levels, inconsistent income) and significant life transitions. While they were structured to reflect different circumstances, there was overlap between vulnerability and ability to pay. In addition, two depth interviews were conducted with people with limited English proficiency, supported by interpreters.

The focus group format was designed to surface shared perspectives, practical challenges, and areas of consensus or tension, rather than to provide detailed accounts of individual enforcement journeys.

Broad agreement with the principles

Participants were broadly in favour of principles they felt would improve their experience or, in a few cases, remove the need to pay their debt.

Participants with experience of enforcement were broadly supportive of the steps and principles set out in the discussion paper developed by the Enforcement Conduct Board. This support was closely linked to their negative past experiences of debt enforcement. Most described their experiences as poor, for a range of reasons, and saw the proposed standards as addressing issues they felt were missing or mishandled. It is important to note that the method did not allow for detailed examination of individual cases and, therefore, it is not possible to determine whether participants had in fact been treated unfairly.

Against this background, participants responded positively to the ideas set out in the discussion paper. Many felt that, if implemented, the standards would have made their experience of debt collection more personalised, less stressful, and easier to navigate.

"It would have made it a lot less painful for me, I can say that." **Visible disabilities group**

"I think bringing the ECB in and having standards in terms of consistency of message, simplicity of message, and delivery of message, I think are really important." **Hidden disabilities group**

Participants reported issues and experiences that related both to interactions with enforcement agents and to the wider process. Agents were described as intimidating or 'bullying' at times, while the process itself was felt to be stressful, particularly due to the volume of letters received and fines increasing over time.

"He said he was coming back in the morning, but he didn't follow or pursue with what he said. It was more like threats. It was quite bully-ish. It wasn't professional at all." **Unable to pay group**

Across the board, they tended to favour components of the standards that they felt would support an easier and more manageable debt collection process. 'Compulsory tools and training for staff' were seen as important because participants expected it would lead to more empathy, clearer explanations, and interactions that felt more 'human'.

'Fair and sustainable payment plans' were valued by many participants who did not think they could afford to repay their debt in one go and wanted arrangements that allowed them more time to pay at a manageable pace.

'Accessible and clear communication' was seen as central to reducing anxiety and confusion, with participants describing existing letters as overwhelming or "threatening". Clearer communication was expected to help people understand their options, know what to do next, and feel less intimidated by the process.

"Instead of coming across as bullying, if they came across as more helpful with more information... if they had the knowledge for [people] to seek advice, that would be amazing." **Unable to pay group**

"They need proper training... just to support the customer and don't be so rude...It's like they want stuff out of the house before you've even agreed whether you can pay it or not. They need to do more training on how they approach people." **Low resilience group**

However, for some, their approval was guided by the principles they felt might delay or reduce repayment. A small subset believed they should not have to repay the debt, and therefore favoured principles they felt would enable them not to repay the debt in full.

“If anything could have made me lower my payment, then that’s the best.” **Unable to pay group**

“If there was better communication and I was able to make my appeals correctly and they’ve listened to my evidence, they could’ve easily not approached my house and terminated the fine.” **Low resilience group**

Disclosing vulnerability and inability to pay

While many reacted positively to earlier debt resolution, a few acknowledged that they did not respond to communications.

Participants responded positively to the ECB’s suggestion that debt should be resolved earlier in the process, particularly at the compliance stage and before an enforcement agent attended their home. Many felt that earlier resolution would have been less stressful and easier to manage than dealing with enforcement at a later stage. A few suggested that proactive outbound calling on the agents’ side felt like an efficient way to facilitate disclosure of vulnerability or sort out a payment plan.

“I think once the court order is signed off, they should contact you and say, ‘hi, we’re just letting you know that basically we took on your debt’, and then maybe they could just go through like a very brief assessment of your daily living ...if you have children, if you live alone, if you live with someone, are you considered vulnerable? Are you on disability? They could try and call you and then if we don’t respond to it, then yeah, cool, it’s our fault. But at least try and give us a bit of a leeway rather than just jumping the gun and acting like we don’t care.” **Visible disabilities group**

“Well, if you speak to that person on the phone, then you can sort it all out in one call. If they’re busy, they’re going to throw it to one side, then they start doing something else, then it doesn’t get done. That’s when the problems start. But if they phone, you can get the whole thing sorted. Yes, I do want to pay. Can we set up a payment plan? Yes, we’ll go through it all. There’s your payment plan sorted, all in one conversation.” **Life events group**

However, many also reported that they had not engaged with early communications from enforcement firms. Most described not responding to letters or phone calls during the compliance stage. Some acknowledged that this was driven by avoidance, including a hope that the debt might go away.

“I just ignored them... I couldn’t believe I got myself into so much debt... You bury your head in the sand and you think it will go away, but it never goes away.” **Visible disabilities group**

“Me personally, and I think there’s probably a lot like me, I don’t look at my emails... if I’ve got a debt, I bury my head in the sand. So I don’t answer text messages, I don’t reply. To be honest, I don’t know what they would do with me because I just ignore it until it gets to the point of this is the last chance.” **Hidden disabilities group**

Others reported that their lack of engagement was shaped by how communications were presented. Some said they believed letters were scams, often because it was unclear what the debt related to, or because the information was difficult to understand.

“A lot of the letters you’re getting through from bailiffs are going to have way too much information on. And when you have a letter that has that volume of information, most people will either turn it off or it feels really heavy, so they’re not going to communicate back to it.” **Unable to pay group**

“I have no idea what kind of fine I’m getting into it. The letters say ... the court orders and you have to pay this amount... the companies keep changing. The letters were coming from two different companies. I was thinking is this a kind of like a scam or something?” **Unable to pay group**

“I think with the correspondence, there should be an obligation for any bailiff or debt recovery company to ensure that the original company where the debt arose is referenced on all correspondence, the date that the debt was created and the history of repayment.” **Low resilience group.**

Others described communications as threatening or intimidating, which they said made the situation feel overwhelming.

“The classic red top letters - they’re printed in a way that’s designed to intimidate and the information within the letter isn’t clear.” **Low resilience group**

Those who did try to contact firms reported challenges getting through to anyone.

A small number of participants did attempt to engage with enforcement firms during the compliance stage. This was a key part of the sample for the research, to capture a range of experiences that included people with experience of an enforcement agent at their homes, but also people who resolved their debt before this happened.

However, most of these reported experiencing difficulties in doing so. These included challenges getting through to a person, reliance on automated phone systems, and confusion when trying to access information online.

“You couldn’t speak to anybody. It was really hard to get anyone on the phone... Even when I tried to go online and put the PCN reference, nothing was coming up on the database, so I thought it’s nothing to worry about.” **Unable to pay group**

“I tried to make a few phone calls, they weren’t having it. So they sent someone to my house, and no one was home at the time, so they forced their way inside.” **Low resilience group**

Some shared experiences where they had attempted to communicate their vulnerability by calling the office, only to be received by an automated payment system without providing an opportunity to discuss the matter with a person.

“When you try to ring them, communicate with them, one of the answer machines comes on and you have no chance or half an hour, probably two hours, you have to wait till you get through to [an actual person].” **Low resilience group**

“Sometimes it would even be when you try to ring them, most of the time they don’t answer you, it goes through a system where you’ve got to just make payments. They just go straight to payment. You know, when the computer’s speaking to you.” **Low resilience group**

Most were happy to share evidence about their vulnerabilities and ability to pay, especially if it would help them negotiate payment plans.

Most participants reported that they would be willing to share information about their vulnerabilities or ability to pay, particularly where they believed this would support resolving their debt or negotiating a repayment plan they felt was fair and manageable. Sharing personal information was generally framed as acceptable if it was clearly linked to a practical outcome, such as avoiding escalation or agreeing an alternative arrangement.

“I think it would be helpful if people could understand to say, look, if I can do this and give this information to not get bailiffs to my door or to set up an alternative, I think people are going to look at that positively.” **Hidden disabilities group**

“I think whilst you’re dealing with them and whilst you’re trying to resolve your debt with them, it would make sense for them to have [personal information]... They would only have the information that you would give them in terms of helping to resolve your debt.” **Life transitions group**

“Show them my income, my payslips... my bank statements, I’m paying my rent, I’m paying my phone bill, I’m paying my water bill, my electricity bill. This is how much I spend on food, my car insurance, things like that. And then whatever I’m left over with is what I can afford to pay you.” **Low resilience group**

However, participants described clear boundaries around the types of information they felt comfortable sharing. Many were more willing to share health or medical information than financial information, particularly among those with disabilities or long-term health conditions. Medical information was often seen as a credible way for firms to understand vulnerability and to take this into account when deciding how to approach the debt resolution. Participants felt that this could influence how strictly the process was applied, for example by prompting a more flexible or cautious approach, or by reducing pressure during interactions.

“Vulnerable people are asking for leniency. We should have to prove why we’re asking for that. Otherwise, everyone would just go, oh, I’ve got this, I’ve got that. I think they’re perfectly within their right to ask.” **Hidden disabilities group**

“I think enforcement agents should have information, so they know who’s vulnerable and who’s not... If it’s not going to put a lot of pressure on me, I don’t mind the information being shared.” **Hidden disabilities group**

One participant felt that they had actually gone to some lengths to provide both medical information and detailed financial information which was then refused. They described their frustration at not feeling able to proactively resolve their situation.

“I’ve given them access to my medical records because I asked them if they want proof of my medical conditions. I’ve even offered them my bank statement and they still refused them. So, if they’re refusing them how are we supposed to go forward?” **Visible disabilities group**

In contrast, participants were more cautious about sharing financial information as it was sometimes seen as something that could potentially lead to negative outcomes. Some participants were concerned that sharing details could result in scrutiny about spending they felt would be judged as non-essential, and lead to agreeing a repayment arrangement with a lower standard of living.

“I don’t believe they should have access to your bank statements. Medical information, I’m more than happy to share, but not your bank statements. They’re going to penalise you for going to Home Bargains.” **Visible disabilities group**

“Even if they got your bank statement, they would find something on there to say well stop paying for that then. They would say why did you go to KFC, why did you have an ice cream? You know they just pick hairs. It’s not very nice. You won’t be able to live”. **Visible disabilities group**

Participants who did try to share information about their circumstances were frustrated about having to repeat this to multiple people within the same firm

While most participants said they were willing to share evidence about their circumstances, some reported that they had actively tried to do so when engaging with enforcement firms and found this experience frustrating. These participants described having to repeat the same information to multiple staff members within the same firm. They felt that information they had already provided was not properly recorded or reflected in subsequent interactions, which made them feel that they were not being listened to or that their circumstances were not being recognised within the process.

“I had already rung the company and explained to them that I had just lost my mum and dad within six months of each other... Never heard from them again. And then all of a sudden, I’ve got a bailiff on the door screaming and shouting and everything else.” **Life transitions group**

“I think the communication was extremely poor, to be honest, because each time you were ringing up, you were almost trying to explain the whole situation over again rather than there being adequate history notes on the system.” **Unable to pay group**

In this context, while participants generally responded positively to the idea of firms recording and using information more consistently across a case, they raised concerns about how long information would be stored for. This was discussed in response to the ECB’s proposed practical step that ‘Firms should record and analyse information about vulnerability for continuous assessment of individual needs through a case and use this to learn how to improve in the future’.

“I wouldn’t necessarily want them to keep my information just in relation to my privacy. At the same time, I understand how it would help them learn and improve in the future, but I think there should be an option to opt out of information staying on their files, maybe after you’ve cleared whatever you have in your case, you can then opt out of them keeping it on their system. I’d almost feel violated if I knew someone who wasn’t in my life like that had this information about a very vulnerable time in my life.” **Life transitions group**

Some participants also said they would be comfortable with relevant information being shared across organisations if this reduced the need to repeat information and led to clearer communication. Across the groups, there was a range in understanding and perceptions of the kinds of personal information that enforcement firms and agents could easily access. Some participants suggested that given the amount of information already shared with the government, they would expect firms to be able to access this information before contacting them.

There was a view that official bodies already hold extensive data about individuals' circumstances, such as benefit receipt or inclusion on the Priority Services Register, and that this information could be used to reduce the burden on individuals to repeatedly explain their situation.

"The government is very much aware of each person's income outgoings. However many mouths they need to feed and don't need to feed. Nothing we have is private information. Whether we tick as many boxes as we like, nothing is private." **Unable to pay group**

*"Maybe if there was like a legislated act in place when it goes to court, where DWP could disclose information on any individual to see if they're actually under any mental health. Because **anyone can say they're vulnerable, but it's DWP that are going to be able to prove that**, whether you're on ESA, Universal Credit, PIP, etc... That could be disclosed then they would be aware without having to contact you."* **Visible disabilities group**

There were mixed responses to the idea of being signposted to free debt advice by agents

Many participants responded positively to the idea of being signposted to free, independent debt advice by enforcement agents. Even where participants were uncertain about the direct usefulness of the advice itself, they felt that the act of referral would require agents to change their tone and approach, and to engage in a more supportive and 'human' way.

"With [enforcement agents] obviously working towards or working with the debt charity companies, it will give them a better understanding of people's situations, and less aggressive." **Unable to pay group**

When discussing the types of support that could be offered during enforcement, participants reflected on the role of debt advice. 'Access to independent debt advice' was tested as an underlying principle within the groups, particularly in relation to ability to pay.

Debt advice organisations such as Citizens Advice, National Debtline and StepChange were frequently mentioned, and most participants were aware of them. However, views on their usefulness were mixed. Some participants described debt advice services as helpful and supportive, while others questioned the practical impact they could have during enforcement.

"I got really good independent advice. Lenders actually put me in touch with organisations. And that advice was really good, I have to say. You know, they give you an hour or something and then they follow up later on to say 'how are you getting on?' There's charities, isn't there, that are very good." **Life transitions group**

A few participants acknowledged resourcing challenges faced by debt advice organisations, meaning that they didn't feel they were necessarily able to offer support as and when the participants would have liked it.

"So my experience of these types of organisations is they're understaffed, under-resourced and you can never get through to them. So it's all good and well saying that you should go seek some free advice. Well, you just can't get through. And when you do get through, it's literally somebody just taking your name and number, saying that somebody will give you a call back because they are that pushed for resources." **Unable to pay group**

“Debt advice, it's kind of like, when they refer you to things like StepChange and things like that. Okay, what's that going to help with? Is that going to stop the bailiff from coming to your door? The real answer is I don't think so, no.” **Unable to pay group**

A small number of participants who had not accessed debt advice during their own experiences felt that this could have made a meaningful difference.

*“I didn't know who or where to get advice from. I was getting advice from Reddit on how to handle the bailiffs... I don't think it would have spiralled this far if the payment plans were based on consulting me on what I was able to pay. And so **maybe if I had independent debt advice, I would have known.**”* **Life transitions group**

Conclusion

Overall, participants with experience of enforcement were broadly supportive of the principles and practical steps set out in the Enforcement Conduct Board's discussion paper. This support was closely linked to their self-reported negative experiences of debt enforcement, which many felt highlighted gaps that the proposed standards sought to address. Participants described difficulties both in their interactions with enforcement agents and in navigating the wider system.

Against this background, participants generally felt that the proposed standards would have made enforcement feel more consistent, proportionate, and easier to navigate. They responded positively to principles emphasising clearer communication, staff training, and more flexible approaches to repayment, which were seen as practical ways to reduce pressure and support arrangements that better reflected individual circumstances. A small subset, however, expressed preferences shaped by a desire to delay or reduce repayment, highlighting the need to balance protections for people in difficulty with fairness to creditors and the enforcement process.

Participants expressed a strong preference for resolving issues earlier in the enforcement journey, particularly at the compliance stage, but many also acknowledged not engaging with early communications. Reasons included avoidance, confusion about what communications related to, and perceptions that letters were overwhelming or intimidating. A smaller number reported trying to engage early but experiencing practical barriers, such as difficulty speaking to a person or accessing information. This points to a tension between the value participants place on early resolution and the challenges they experience in engaging at that stage.

Most participants said they would be willing to share information about their circumstances where this was clearly linked to achieving a practical outcome, such as agreeing a repayment plan or avoiding escalation. They described boundaries around what they felt comfortable sharing, with greater acceptance of sharing medical information than detailed financial information. Some who attempted to share information reported frustration at having to repeat themselves, shaping positive reactions to proposals around recording and using information more consistently across a case.

Awareness of independent debt advice was high, but views on its usefulness varied. Many participants nonetheless viewed signposting to free debt advice as a positive signal of a more supportive approach from enforcement agents.

Annex I: Research materials

As described in the methodology section of this report, the research team created stimulus for the focus groups based on the ECB's discussion paper. This discussion paper included the ECB's early thinking on direction of travel on the new vulnerability and ability-to-pay standards. The research did not test the actual standards themselves.

Within the discussion paper there were two key types of content that were used within the testing:

- Practical steps for firms and agents
- An overview of the ambition for earlier intervention

Earlier intervention

In terms of the potential for earlier intervention, the research tested the following two statements:

- Firms to identify and understand someone's financial information before enforcement
- Firms to work with creditors and other sources to make an early assessment of individuals' personal circumstances

Vulnerability

The research team grouped the practical steps for firms and agents into the following five themes:

- Better identification and awareness of vulnerability
- Appropriate response and support
- Accessible and clear communication
- Better monitoring of vulnerability
- Compulsory tools and training for staff and agents.

Within each focus group, participants were required to rank these themes from 1-5 in terms of importance. The top 1-2 themes within each group were discussed in more detail.

Ability to Pay

The research team grouped the practical steps for firms and agents into the following three themes:

- Fair and sustainable payment plans
- Evidence-based decision making
- Access to independent debt advice

Within each focus group, participants were required to rank these themes from 1-3 in terms of importance. The top 1-2 themes within each group were discussed in more detail.