



ENFORCEMENT  
CONDUCT  
BOARD

MARCH 2026

# ECB Vulnerability Standards for Enforcement Work: **Consultation Response**



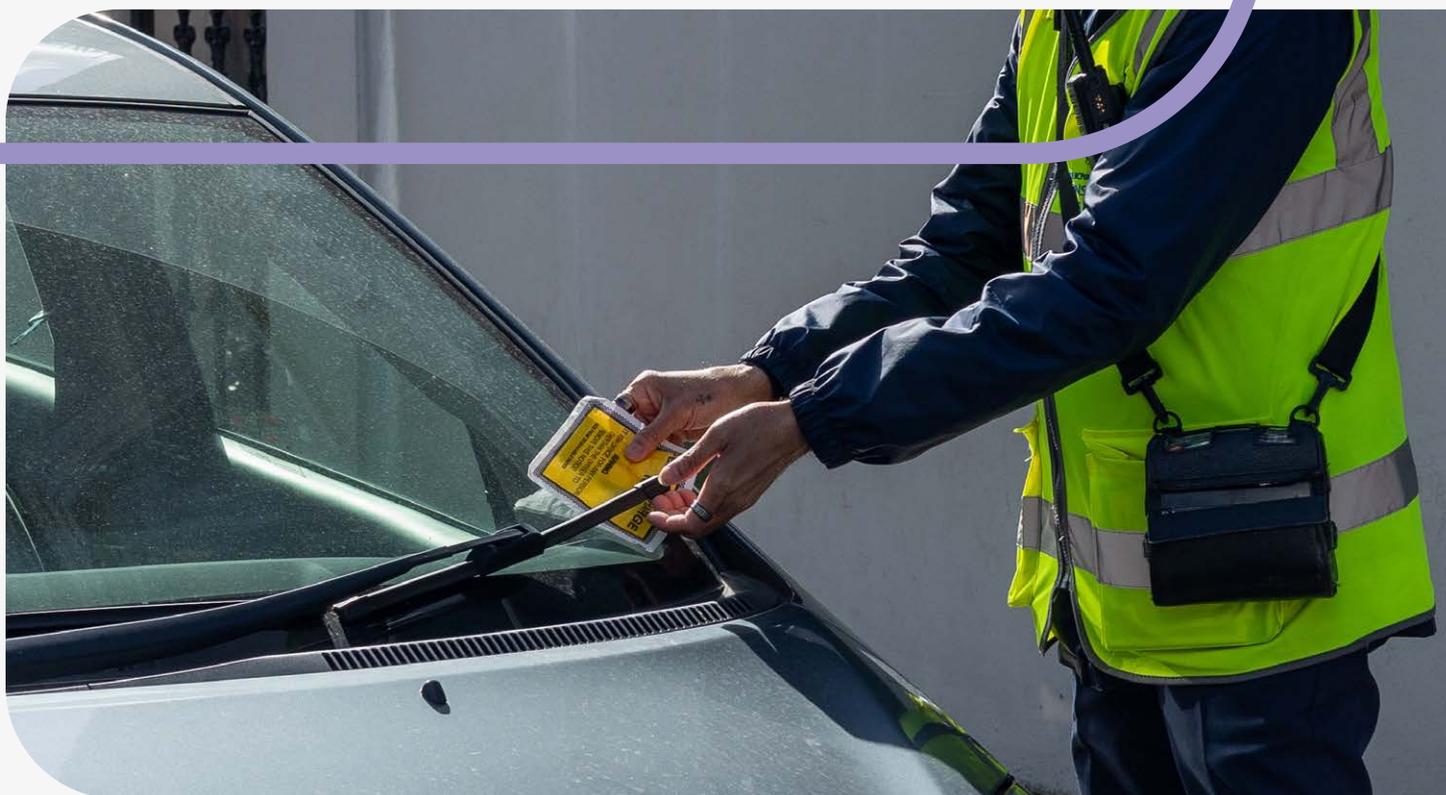
# Background

1. The ECB is the independent oversight body for the enforcement sector. Our mission is to ensure that everyone who experiences enforcement action is treated fairly. To achieve this, we set Standards, monitor compliance with these Standards and take action where there are breaches. We also run an independent complaints adjudication scheme for members of the public who believe that they have not been treated fairly through the enforcement process.
2. The ECB exercises its oversight of the enforcement industry through an accreditation scheme for firms that undertake enforcement work under the Taking Control of Goods Regulations 2013. In order to be accredited, firms need to sign up to the ECB's accreditation criteria. The accreditation framework sets out a range of powers that the ECB can exercise to ensure that accredited firms are meeting the criteria and that there is accountability where these are not met, including sanctions.
3. We have accredited 45 firms across the civil and high court enforcement sectors, achieving coverage of over 97% of the market for debt enforcement work under the Taking Control of Goods Regulations, based on the volume of work completed.
4. We published our first Standards for Enforcement Firms and Standards for Enforcement Agents (V1) in October 2024. These set a new benchmark for fair enforcement, and all ECB accredited enforcement firms have committed, through the accreditation criteria, to meet these Standards. An updated version, V1.1 was published in March 2025 and supplemented V1 of the Standards with guidance in specific areas where this had been requested.
5. When we consulted on V1 of the Standards for Enforcement work, we stated our intention to develop our Standards for Vulnerability and Ability to Pay over a longer timeframe, due to the sensitivity and complexity of the issues involved.

# Executive Summary

6. We began developing our new Vulnerability Standards in 2025 and have carried out an extensive programme of engagement and consultation with the enforcement industry, debt advice sector and other key stakeholders, commencing in April 2025. This has included:
  - a. Workshops with debt advisers and national debt advice charities
  - b. Workshops with accredited firms
  - c. Further engagement through events and conferences with local authorities and creditors, including the Institute of Revenues Rating and Valuation (IRRV) regional forums and Local Authority Civil Enforcement Forum conference.
7. After reflecting on the findings and feedback from our early engagement work we published a set of draft Standards for formal consultation. The formal consultation period opened on 19th September 2025 and ran for six weeks, closing on 31st October. During this time, we carried out further engagement with industry and other key stakeholders including two virtual and one in-person workshops with industry and meeting with the Taking Control Coalition of debt advice charities.
8. It is also important to the ECB to ensure that the views of the people who carry out enforcement and those who have experienced it have shaped the development of the Standards. To help us to achieve this we commissioned an independent research company to test and explore our early thinking on the key concepts and principles that underpin the Standards with enforcement agents and people who had experienced enforcement within the last two years.
9. Twenty-one enforcement agents in total participated in five focus groups in addition to an in-depth interview with an agent who also had experience of working as frontline staff in a call centre. In total, thirty-five people with lived experience of enforcement participated in two focus groups with people whose financial circumstances gave them low ability to pay, and four groups focused on people experiencing different forms of vulnerability. We have referenced some of the research findings at appropriate points in this report and the full research reports can be downloaded from the ECB's website [here](#).

10. This document provides a summary of the responses to the consultation and details of how the ECB has responded, including the changes we have made to the Standards. The final Standards can be found on the ECB's website [here](#).
11. The ECB received thirty responses to the consultation, submitted by a wide range of stakeholders including enforcement firms and industry bodies, debt advice sector representatives and individual debt advice organisations, large utilities providers, the Money and Pensions Service, and an enforcement agent.
12. We are grateful for the invaluable input and level of engagement we have received throughout our programme of activity to develop the Standards. We appreciate the thoughtful approach taken to this final consultation by most respondents who provided constructive feedback, alternative proposals and examples of good practice.



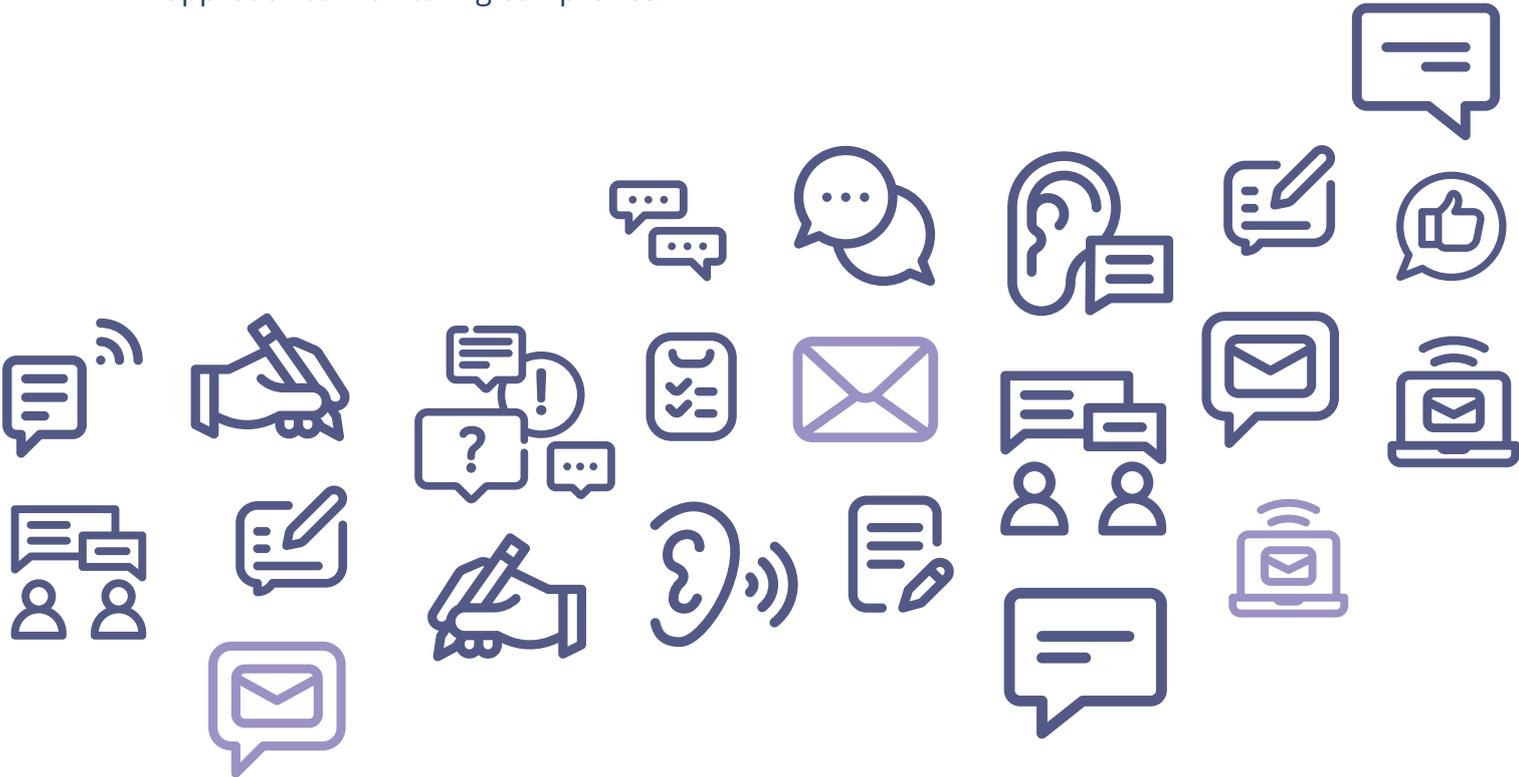
# Overall response to the Standards

13. As expected, we have received a broad range of views, including some areas of significant variance. This has provided the ECB with a great deal to reflect on. Wherever possible we have aimed to achieve a balanced response, and the consultation has highlighted some issues that will form part of our longer-term programme of work including future iterations of the Standards.
14. The significant majority of responses were supportive of the Vulnerability and Ability to Pay Standards, recognising them as a necessary evolution that codified some existing good industry practice and were realistic and consistent with legislation. The ECB's approach was seen as appropriately recognising that vulnerability is a fluid state encompassing a wide range of factors that can negatively impact someone's ability to advocate for themselves effectively. It was also highlighted that these factors are often temporary and do not mean that someone is permanently unable to repay their debt.
15. Respondents noted that the Standards will nonetheless challenge firms to anticipate vulnerability and respond appropriately to individual circumstances. Clarity on the ECB's expectations was therefore requested in a wide range of areas, and we will need to work with industry and other key stakeholders over the coming year to develop guidance where it is needed to achieve consistency of outcomes for people experiencing enforcement.
16. Some responses raised concerns about how 'quasi-legal' obligations could conflict with the statutory framework and existing regulations governing enforcement conduct. In developing the Standards, we have been mindful of a range of relevant activity and proposed changes in the wider enforcement sector landscape including the Ministry of Justice's review of the Taking Control of Goods (Fees) Regulations which referenced the ECB's intention to develop the Standards. Other relevant developments include the Ministry of Housing, Communities and Local Government's proposed reforms to collection and enforcement of council tax and the forthcoming review of the statutory Debt Respite Scheme.
17. The ECB Vulnerability Standards are intended to complement, not supersede existing legislation, regulation, statutory frameworks or the Standards for Enforcement practice. We are confident that this is the case and that these Standards do not contradict any existing legislation including the Mental Capacity Act or the exemption enforcement agents have from the Harassment Act 1977.

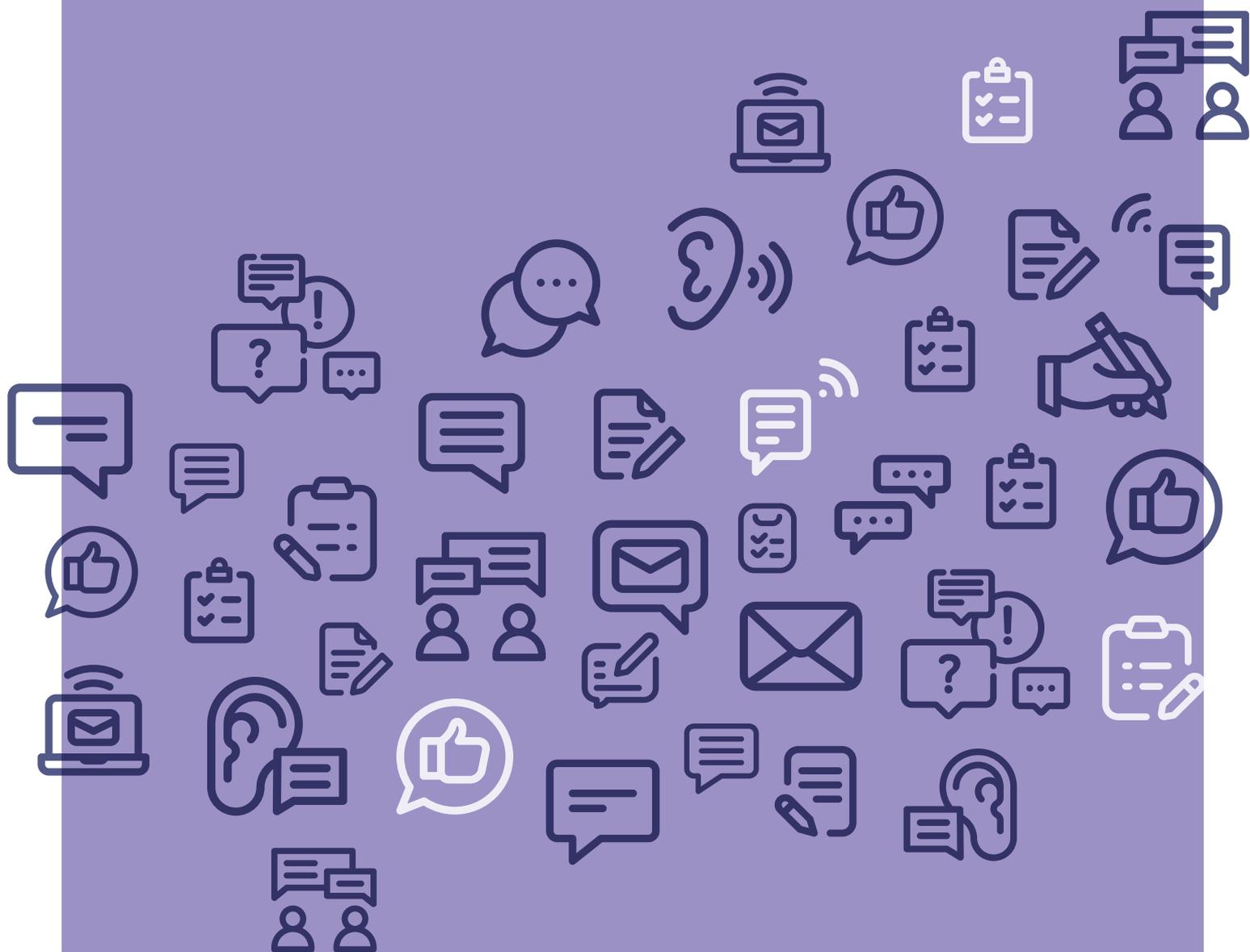
18. Another key concern centred around the principle which underpins the Standards that identification of vulnerability does not mean that enforcement should automatically cease or that someone should not repay their debt. Several responses were keen that this should be enshrined in the Standards and guidance, particularly for agents, and reiterated in all public facing communications. In contrast, other respondents expressed concern about whether it could ever be safe to proceed with enforcement where vulnerability had been identified, proposing that all enforcement should automatically cease in this event.
19. Other overarching concerns focused on the practical implications and costs of implementing the Standards as well as the potential systemic impact that 'slowing down' the enforcement process would have on debt recovery timescales. Several respondents expected this to be the result of the additional processes of assessment, administration and data recording that would be required to meet the Standards as well as a potential increase in complaints.
20. We are clear that enforcement does not need to cease automatically where vulnerability is identified, provided that the right guardrails are put in place to mitigate the risks of someone experiencing harm. The aim and requirements of the Standards are to enable enforcement to continue in cases where identification can lead to provision of appropriate support. We are aware that existing good practice in enforcement enables many people in vulnerable circumstances to repay their debts sustainably, provided they have been identified and their needs are responded to through a 'vulnerability pathway'.
21. As a result of feedback from the consultation, lived experience research and our other engagement activities, we have made some revisions to the Standards and definitions that we consulted on. This paper sets out the summary of the responses, the ECB's response to them and the reforms that we intend to take forward. These changes can be found summarised in a table at Appendix B. The most substantive change that we have made is to combine the separate Vulnerability and Ability to Pay Standards into a single set of overarching Vulnerability Standards incorporating the specific ability to pay requirements as standalone elements. The format comprising a version of the Standards for firms and a separate but linked version for agents remains the same.
22. Overall, we believe that feedback from the consultation process has allowed us to refine our approach and introduce more streamlined Standards that should achieve the intended outcomes in a more targeted, practical and proportionate way. We are grateful for the time people put into providing feedback that has allowed us to reach this position.

# Implementation

- 23. The new Vulnerability Standards launched on 23rd March 2026, and the ECB's intention is that they should come into force in January 2027.
- 24. ECB accredited enforcement firms and local authority in-house teams will now have a period of three months ending 23rd June to develop their plans for implementing the changes required to enable them, and the enforcement agents and frontline staff who work for them, to comply with the Standards. At this point they should be prepared to provide the ECB with an assessment of their readiness (if requested). We will expect to be reviewing a selection of these plans through our pilot compliance visit programme. Firms will have a further six months to deliver the implementation plans fully before the Standards come into force in January 2027.
- 25. Compliance with the new Vulnerability Standards will form part of the ECB's oversight approach from the date they come into force. As with the introduction of V1 of the Standards for Enforcement, there will be an iterative process of testing and learning as the new Vulnerability Standards bed in. The ECB will use an evidence-based approach, drawing on oversight and complaints data to ensure a proportionate approach to monitoring compliance.



# Responses to the Consultation



## Question 1 – Do you have any comments on the proposed definition of “vulnerability” and “potential vulnerability”?

26. We received extensive feedback on the definition of vulnerability in the consultation responses. The overarching request was for a simpler and more accessible version. Several respondents felt that it was ‘circular’ and implied that someone could only be vulnerable if they were identified as being vulnerable by a firm or agent. The phrase ‘especially susceptible’ was also highlighted as confusing. There were also proposals that the Standards should use the existing ‘gold standard’ definition used by the FCA.
27. It was also proposed that the ECB’s approach to vulnerability should draw on narrower existing definitions of vulnerability already used in enforcement. These include protections for people who lack capacity due to physical or mental health conditions and consequently cannot understand or make a rational decision about the enforcement process. Other suggestions included responding to safeguarding situations.
28. Many responses expressed overarching concerns about the Standards’ framing of vulnerability around the ‘harm(s)’ that someone could be vulnerable to and particularly the Standards’ wording of ‘additional foreseeable’ harm. They highlighted that this potentially positions enforcement as an inherently harmful process. A number of respondents were concerned that the ECB’s new Standards would imply that enforcement activity cannot be undertaken if the person experiencing enforcement is vulnerable and were keen that the ECB should enshrine this principle in the Standards and public facing communications.
29. However, others expressed the opposite view, raising concerns about whether it could ever be safe to proceed with enforcement where vulnerability had been identified and proposing that all enforcement should automatically cease in this event. Respondents also raised the question of the extent to which agents and firms could be held accountable for all harms experienced during or beyond the enforcement process. It was felt that the ‘baseline’ harms of over-indebtedness were likely already to be affecting many people experiencing enforcement.
30. The ECB also introduced the concept of ‘potential vulnerability’ in the Standards that we consulted on. Many respondents felt that this concept was confusing and did not reflect the practical reality of how someone would enter the ‘vulnerability pathway’ in the enforcement process. There were concerns about how an agent would satisfy themselves that it would be safe to proceed with the ‘standard’ enforcement process. Some responses also highlighted the risk that the ECB was inadvertently creating a ‘hierarchy’ or additional category of vulnerability and that the FCA had discontinued use of the term upon identifying some of these challenges.

## The ECB's response

31. We are grateful for the constructive engagement in relation to this question. As a result of the feedback we received we have worked to modify our definition of vulnerability to ensure that it is not circular and removed the phrase 'especially susceptible'. This maintains the focus of the Standards on mitigating the increased risk of harm posed by someone experiencing the drivers of vulnerability in their personal circumstances while subject to enforcement action. We have chosen not to replicate the FCA's definition of vulnerability because, although we aim to achieve some alignment with the FCA definition of vulnerability, in our view it is important to have a definition specifically tailored for the enforcement context.
32. Following the feedback we received about the concept of potential vulnerability that we introduced in the Standards, we have re-evaluated and believe that our intended outcomes can be achieved through the overall framework and wider Standards. We have therefore removed the definition of 'potential vulnerability' and all references to it.
33. Taking all these changes into account, the new definition of vulnerability is:
- 'A person subject to enforcement is defined as being vulnerable for the purposes of these Standards at a time when, due to their personal or financial circumstances, that person is at increased risk of harm during the enforcement process'.*
34. In response to the concerns about creating a hierarchy of vulnerability, we have also removed the term 'acute' that was used in the provisions relating to situations where it would be unsafe to proceed with enforcement and may be appropriate to return the case to the creditor. The latest draft of the Standards focuses instead on situations where there is a high risk of harm that cannot be mitigated. This also responds to concerns that in some situations simple 'adaptations' are insufficient to make it safe to proceed.
35. The original headline vulnerability 'aim' has also been recast to set a new overarching objective of ensuring that people in vulnerable circumstances achieve fair outcomes from enforcement, mirroring the ECB's mission. This also outlines the specific requirements for identifying and responding to vulnerability and ability to pay that will be required to enable firms and agents to achieve this in practice. The new version of the definition remains underpinned by a description of the drivers of vulnerability and types of harm that someone could be vulnerable to, which is set out in the Standards and definitions.
36. In relation to the comments received about our use of the word 'harm', the ECB maintains that a framing of harms that someone could be 'vulnerable to' is an appropriate way of articulating and defining vulnerability consistent with current good practice in related sectors. The same terminology is used by the FCA in setting its expectations of regulated financial services firms and this will be consistent with definitions already used by some of the largest enforcement firms. Consequently, we consider it to be appropriate for the enforcement context.

37. In response to the concerns expressed we have reviewed and revised the definition of harm. We have replaced 'harm', which was causing some circularity in the definition, with 'adverse impact'. In line with the boundary of accountability that we have set with 'foreseeable harm', we have also removed the categories of 'social' and 'relational' harm which we consider more likely to be longer term impacts beyond the enforcement process itself. Taken together, the new definition of harm is:

*'Adverse impact of, for example, a physical, psychological and/or financial nature to varying degrees of severity which someone might experience during the enforcement process due to their personal circumstances.'*

38. We have also removed the term 'additional' [harm] from the 'identify and respond' requirements of the new Standards. We consider 'foreseeable harm' to provide an effective boundary of accountability that underlines the expectation that a firm or agent will take proactive steps to identify where there is a risk of someone experiencing harm and take steps to mitigate it as soon as they do so.

39. We will also seek to ensure that our messaging about harms in enforcement are consistent throughout our communications about the Vulnerability Standards and approach.



## Question 2 – Do you have any comments on the draft Standards on Vulnerability for Enforcement Firms?

### Vulnerability Strategies

40. In majority, respondents supported the requirement for firms to have a vulnerability strategy in place. Many firms noted that these already exist and that they will not require significant adjustments to comply with the Standards. Some also shared details of existing good practice, including the steps taken to understand and address levels of vulnerability in their business, particularly where work is concentrated in areas of high deprivation. Some responses suggested that the ECB should require firms to publish their strategies, replicating Ofwat's requirements for water companies.

### Pre-enforcement information gathering

41. Virtually all responses supported the ECB's aim of reducing the number of cases involving vulnerability being referred to enforcement through better pre-enforcement checks. However, many highlighted the significant challenges involved in meeting the Standards' requirements for firms to obtain information about the personal or financial circumstances of individuals before commencing the enforcement process.

42. Using external data sources was also viewed as problematic. Some responses referenced the availability of new vulnerability databases and the need to adopt these as the primary route to accessing vulnerability-specific data. Others noted that credit reference agency data and predictive scoring is easy to access and use, while others cautioned against the unintended consequence that this might have in causing negative impacts on credit files. Overall, there were reservations about the reliability, usefulness and costs of accessing all the different data sources.

### Remuneration and contracting

43. The requirement of the Vulnerability Standard that firms address contracting, remuneration and KPI setting as part of their Vulnerability Strategy (FS14.2)<sup>1</sup> reinforces the expectations of the ECB's overarching Standards for enforcement (FS1.14). Many responses highlighted that firms would need to make significant changes to their current approach to remuneration and contracting in order to comply with the Standards. There was also concern that the Standards did not include specific guardrails for self-employed agents. This was both in terms of the training and ongoing support that agents will need to understand and comply with Standards by following the policies and processes set by the firms that they work for, as well as the potential reduction in commission-only remuneration.

1 When the new Vulnerability Standards come into force in January 2027 they will be integrated into V1.1 of the ECB Standards. Until then the relevant sections of the National Standards set out in V1.1 will continue to apply. To allow firms to prepare for implementation, the Vulnerability Standards referenced here are numbered as a continuation of V1.1 of the Standards, beginning at FS11 for Enforcement Firms and AS8 for Enforcement Agents.

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44. Agents who participated in the research reiterated this, noting the challenges that current remuneration structures would pose to them complying with the Standards. Taking more time to carry out assessments and document them would reduce the number of calls they could make in a day. This also posed the risk that less scrupulous agents would focus on more 'lucrative' calls. They suggested that firms may need to provide higher basic salaries, be more flexible and set less stringent productivity KPIs as well as taking ultimate responsibility and accountability for decisions made about vulnerability and someone's ability to pay.
45. There were suggestions that ECB should require firms to go further than simply ensuring there are no disincentives to compliance and actively incentivise staff to identify and support people with vulnerabilities. One response also noted that there should be greater use of partial fee payments, which had been permissible since the introduction of the Taking Control of Goods regulations in 2014.

### **Vulnerability Support**

46. Most respondents were comfortable that the range of adaptations and responses set out at VF5.1 and following (FS16 and following) were practical and reasonable and in alignment with existing good practice. However, some felt that these were too simplistic to address the complexity and multi-faceted nature of vulnerability and proposed that all firms should be required to have an easily accessible specialist welfare team empowered to respond quickly.
47. In relation to VF5 (FS15) and following, which sets expectations for how firms should identify and verify vulnerability, many respondents felt that the existing evidence-based approach was fair and effective. Respondents agreed that those who were 'genuinely' vulnerable were typically willing to volunteer 'reliable' personal information to corroborate their circumstances. This view was also supported by agents and people with lived experience of enforcement who participated in our research to test the Standards.
48. Respondents noted that it was important that firms' evidence requirements should be flexible and reasonable and the ECB should provide guidance on what this would mean in practice. The difficulty some people faced obtaining evidence in a 'straightforward and quick way', for example due to delays getting an GP appointment was also highlighted. We heard that firms' current practice varies, with the time given for someone to gather evidence ranging from 14 to 28 days and further extensions given in specific circumstances. The significant difficulties in obtaining a formal diagnosis made evidencing mental health even more challenging. One creditor encouraged use of the existing debt and mental health evidence form, which allows 28 days.

49. There was some nervousness about the requirements for responding to disclosures of vulnerability, particularly in the absence of information about a case when none was available or forthcoming. Firms were unsure how they would evidence that a decision to proceed with enforcement in this situation complied with the Standards. Similarly, respondents queried what steps an agent or firm should take where a declaration of vulnerability was 'evidently untrue' or if someone continued to repeat it after the firm or agent had decided that it was safe to proceed.
50. Some responses expressed reservations about the additional data that firms would need to gather and store in order to comply with the Standards, particularly as most vulnerability data is of a sensitive personal nature. Other highlighted a range of areas where there were potential conflicts with GDPR, including the need to seek explicit consent to share vulnerability data and the risks of non-compliance in storing sensitive personal data for too long.
51. These related particularly to the requirements of the Standards to share vulnerability data with creditors (VF4.8) and to link cases where vulnerability had been identified (VF5.2). Some respondents felt that people would be uncomfortable with a firm continuing to hold data about a short-term vulnerability once their circumstances had changed, as well as highlighting challenges around obtaining their explicit consent to do so.
52. There was support for the ECB's outcomes-based approach and responses sought further guidance on the types of data that firms should be recording and the approach they should take to monitoring and evidencing the outcomes being achieved in different cases. Responses emphasised the importance of firms being able to carry out analysis and make comparisons of outcomes, for example across different types of vulnerability, using a Monitoring, Evaluation and Learning (MEL) approach. Some respondents felt that firms should use this data to identify the types of harm most frequently occurring in their business and develop a proactive approach to preventing these, suggesting good practice examples from other sectors to support this.

### **Assessment of assets**

53. Questions were raised about the requirement that firms should extend the compliance stage in order to enable frontline staff to seek to agree a payment plan (APF5.3 and 5.4). It was noted that the definition of Ability to Pay in part 'with money and/or assets' added a circularity to this, suggesting that it was not possible to determine whether someone has the Ability to Pay in part without first assessing assets. This was felt to be particularly applicable in High Court cases where creditors will always have the right to decide whether they wish to offer a payment arrangement at compliance stage.

## The ECB's response

54. We are grateful for the detailed feedback that respondents provided to the draft Standards for firms. This has highlighted key areas of the Standards where there is potential for the ECB to give further consideration to how the Standards will be implemented in practice and we will look to work with industry and key stakeholders to identify good practice examples and, where necessary provide additional guidance in response to some of the key issues raised. In doing so we will consider the helpful suggestions proposed in many consultation responses.
55. The list of adaptations that firms and agents could use to respond to vulnerability set out in the Standards are not intended to be exhaustive or prescriptive. The types of support that firms offer should be proportionate to the nature and size of the business and this will be taken into consideration in the ECB's oversight approach. We do not agree that dedicated, specialist welfare teams are needed in all firms, particularly as this would be overly burdensome for very small firms. The key is that appropriate support can be provided by people who are appropriately trained to do so.
56. In relation to evidencing vulnerability, the intention of the Standards is to ensure that evidence requirements do not place the onus on someone to 'prove' their vulnerability in a way that unfairly delays or prevents them from accessing appropriate support. However, we do not consider it necessary or appropriate to update the Standards to mandate specific timescales for providing evidence, as this is most effectively approached on a case-by-case basis. We will work with stakeholders to identify good practice. For example, some respondents highlighted existing resources on data sharing to support vulnerable people, including the Money Advice Trust's 'Ten principles for designing vulnerable consumer data-sharing programmes'.
57. We are confident that firms and agents will be able to implement the Vulnerability Standards in a way that does not conflict with legislation, regulation or their existing data protection policies and processes. We believe that the importance of the Standards, particularly FS26., which requires firms to link cases involving vulnerability proactively warrant the work that this might entail. For example, agents who participated in research to test the Standards specifically highlighted the current issues caused by cases not being linked, even when the agent has alerted the firm to the vulnerability. We expect firms to take a proportionate approach and, where necessary, we will work with key stakeholders to ensure that firms are able to do this in a way that is compatible with GDPR.
58. We recognise the tension between the objective of the Standards to see more sustainable payment plans set up at compliance stage and the need to assess assets where this is appropriate. However, we do not propose to change the definition of 'ability to pay part only' as we believe that while this clause will not be applicable to every case, there will be some circumstances where, at compliance stage, agents and/or frontline staff will be able to use evidence provided by the individual experiencing enforcement or the creditor to determine that they have the 'ability to pay in part only'. We have also clarified in FS19.1(i) that where a payment plan is acceptable to the creditor and a credible offer has been put forward at compliance stage, firms should (if needed) extend the compliance stage to enable it to be put in place. We understand this to be in line with existing practice.

## Question 3 – Do you have any comments on the draft Standards on Vulnerability for Enforcement Agents (including the proposed application to third parties)?

59. Many responses were supportive of the Standards for enforcement agents overall, seeing it as a natural progression for the onus to be on the agent to look for indicators of vulnerability and respond, even in the absence of a disclosure, “balancing the welfare of the debtor with the court’s expectation of diligence in execution”. Again, the Standards were felt to codify the good practice often shown by agents carrying out a challenging and skilled job, identifying and responding to vulnerability at first hand.
60. However, some respondents felt that entrenched behaviours would only change if agents were positively incentivised to identify and act on indicators of vulnerability, ceasing or adapting their approach to enforcement where appropriate. Otherwise, they would continue to prioritise earning fees and commission and meeting their contract terms. Many responses noted the importance of agents receiving training on the new Standards, with some expressing concerns about situations where agents are seen to be continuing to use the National Standards while disregarding the ECB’s Standards.
61. It was also suggested that agents would be worried about being held accountable for decisions about vulnerability and felt that ultimate responsibility should rest with firms and creditors. There were fears that, as agents are neither trained social workers or healthcare professionals, there was a risk that they might give the wrong advice and be held liable for doing so. However, other responses suggested that agents do not currently take ownership of responding to vulnerability because, in line with the National Standards, they regard this as the responsibility of the firm or creditor.
62. There were also concerns about how agents would be confident that it was ‘safe to proceed’ with enforcement when they had identified vulnerability. Some respondents felt that the ECB should provide agents with guidance and examples of what would constitute ‘safe continuation criteria’ to ensure a consistent approach.
63. Agents who participated in the research emphasised the importance of firms taking responsibility for monitoring and recording information about vulnerability and ability to pay that had been disclosed to them and communicating this to agents. This was vital for them to be able to verify circumstances and progress cases through an appropriate route.

### Third Parties

64. Overall, respondents were supportive of the third-party Standards, although some were less sure how they would apply in practice and whether they duplicated existing protections provided by the Taking Control of Goods Regulations 2013 (10,14,23). Firms noted that although the focus should be on the person who owes the debt, their agents are already trained to act professionally and with ‘empathy and discretion’ in relation to all individuals who are, or become involved in the enforcement process. Consequently, they were confident that agents would respond appropriately to signs of vulnerability in third parties.

65. There were strong representations about whether the new Standards would conflict with the need for agents to comply with GDPR and existing requirements that an agent can only interact with a third party who is already aware of the facts of the case. Others questioned whether there was an expectation that agents would proactively seek information and if so, what evidence they could reasonably be expected to obtain. It was also questioned whether it was practical or appropriate to try and make an assessment of their personal or financial circumstances.
66. Some proposed that the Standards should be clear that an agent can only make an observational assessment and respond accordingly where issues of safety or someone's immediate welfare are identified.



## The ECB's response

67. We acknowledge that decisions about proceeding with enforcement when vulnerability has been identified are difficult and complex. We think that the definition of 'potential vulnerability' may have been causing some of these concerns and that removing it should help to make the process of identifying and responding to vulnerability simpler, including decisions about when and how it is safe to proceed with enforcement. The process set out in the final Standards should lead the agent to provide appropriate adaptations or support that mitigate the risk of harm and enable the enforcement to proceed or cease enforcement when necessary.

68. We appreciate the reflections on the third-party elements of the Standards and recognise the challenges of requiring agents to solicit information from third parties even for safeguarding purposes. In light of the feedback we received, we think that it is a more reasonable and practical expectation for agents to respond to what they see. Consequently, we have changed the wording of the Standard to require agents only to respond to 'observable indicators' of vulnerability and ability to pay (AS16. and following) which was proposed in several responses.



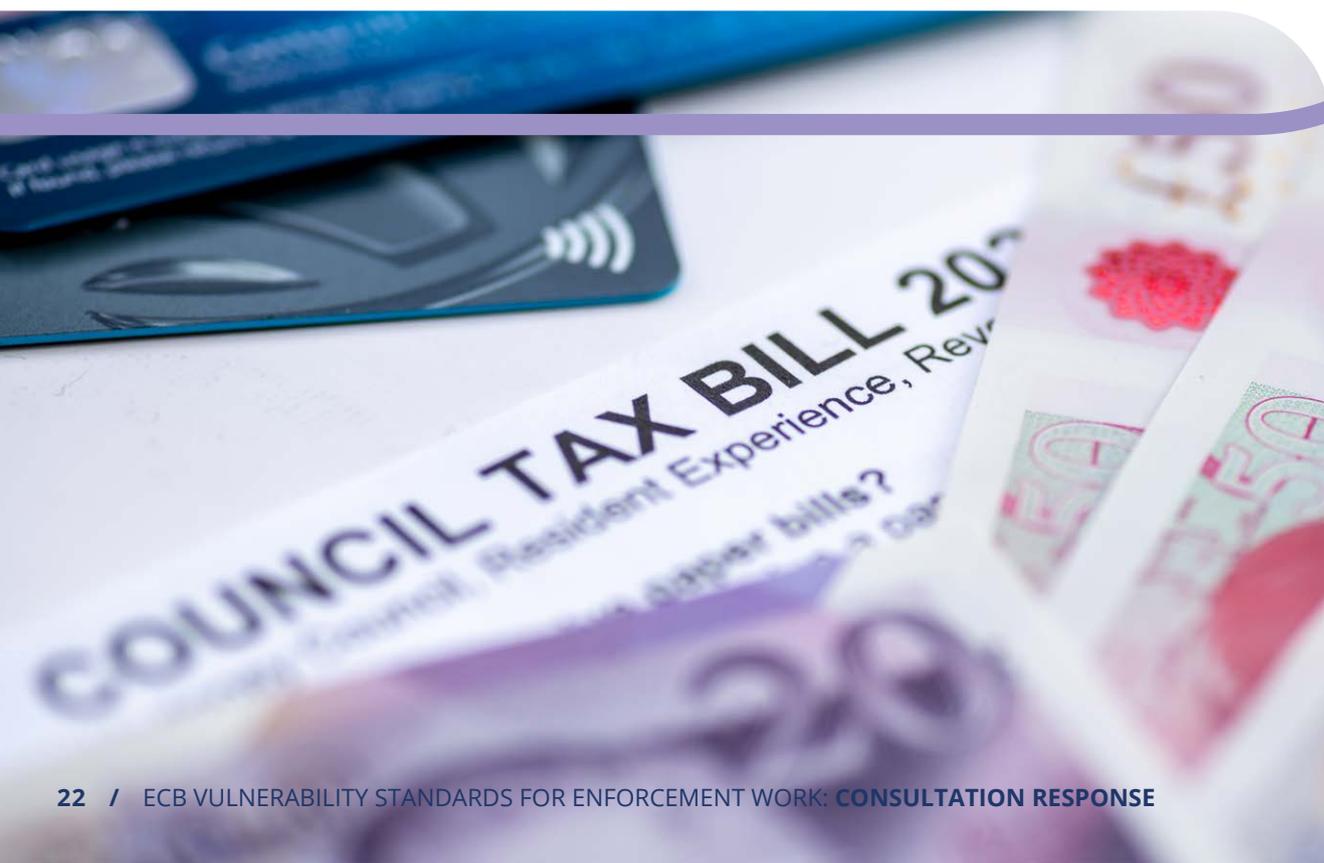
## Question 4 – Do you have any comments on the proposed ability to pay outcome and the categories of ability to pay?

69. There was widespread support for the ECB's aim that the approach to ability to pay would enable more people to get out of debt with increased cases being resolved at compliance stage and sustainable payment plans being put in place. There were some concerns about how this would work in practice in relation to the requirement for an enforcement agent to seek payment in full or take control of goods in lieu.
70. However, there was strong pushback on having separate vulnerability and ability to pay Standards. The existing 'resilience' driver of vulnerability was viewed as reflecting the typical circumstances of someone experiencing enforcement, as well as it being unusual to find someone with low ability to pay who did not have at least one other vulnerability. Having two processes of 'identifying and responding' was also viewed as an artificial separation of current practice where financial assessment is part of an overall assessment of support needs.
71. Most responses supported the ability to pay 'categories' as an appropriate reflection of existing practice. However, there was some apprehension that 'ability to pay in full' implied that firms and agents would have to prove proactively that someone could pay in full rather than starting from the position that they could, and responding to indicators that they were unable to do so. There was also emphasis on the fact that agents were required by the courts to seek payment in full, and consequently there were concerns about how they would demonstrate that they had not pressured someone to pay in full as required by APA5.3 (AS15.1(ii)). Others raised the issue of whether including 'no ability to pay' as a category would give the impression that someone could simply claim that this was the case.
72. Some respondents viewed 'ability to pay in part' as too broad, suggesting that the ECB providing reference thresholds and timeframes would be helpful to increase consistency in industry practice and ensure alignment between the expectations set by debt advice and creditors. It was also noted that 'no ability to pay' would be most likely to apply to council tax and other 'rolling' debt, while 'ability to pay in part only' would be more appropriate for short-term debts such as parking fines.
73. There were suggestions that commercial debtors should be explicitly excluded from the protections of the Standards, along with persistent evaders, in alignment with DfT's statutory guidance.

## Assessing ability to pay

74. Industry responses highlighted the challenges that client requirements posed to making sustainable payment arrangements. For example, some required repayments to be negotiated based on the Attachment of Earnings scale, resulting in much higher payments than they would typically look to attain for other clients.
75. Many responses sought clarification of the objective standard that firms should use to assess ability to pay required by APF4.4. Other responses advocated for the ECB to require firms to use the Standard Financial Statement (SFS) as the only widely recognised objective standard for calculating affordability and ability to pay. Some respondents also felt that the Standard was not sufficiently robust to prevent firms from ignoring repayment recommendations and payment offers from debt advice without an objectively justifiable reason for doing so.
76. Questions were raised about how assets should be approached, in determining which ability to pay category applied to someone, noting that this would be particularly challenging at the compliance stage. Some responses observed that the inclusion of 'eligible assets' in the Ability to Pay categories suggested that an enforcement visit would need to be undertaken in all cases and that this created a conflict with requirements to set up a payment plan at compliance stage.
77. Firms also noted the importance of undertaking an enforcement visit to assess assets where this was required by the creditor to enable them to return a case. Similarly, confirming nulla bona or 'no-goodsing' is essential, particularly where committal proceedings are being considered. This was also reiterated by agents who participated in the ECB's research.
78. Another view was that assessment of assets had no place as part of an assessment of ability to pay, as it was effectively an invitation for an agent to consider taking control of goods. It was suggested that the ECB should introduce an alternative approach of considering it only as a last resort after the option to arrange a payment plan had been exhausted.
79. Several responses observed that someone faced with removal of goods, particularly a vehicle, may feel pressure to agree to an unsustainable payment plan. The alternative option of 'protecting' the asset and enabling someone to retain use of it by entering into a controlled goods agreement was highlighted as potentially more appropriate for situations involving vulnerability.

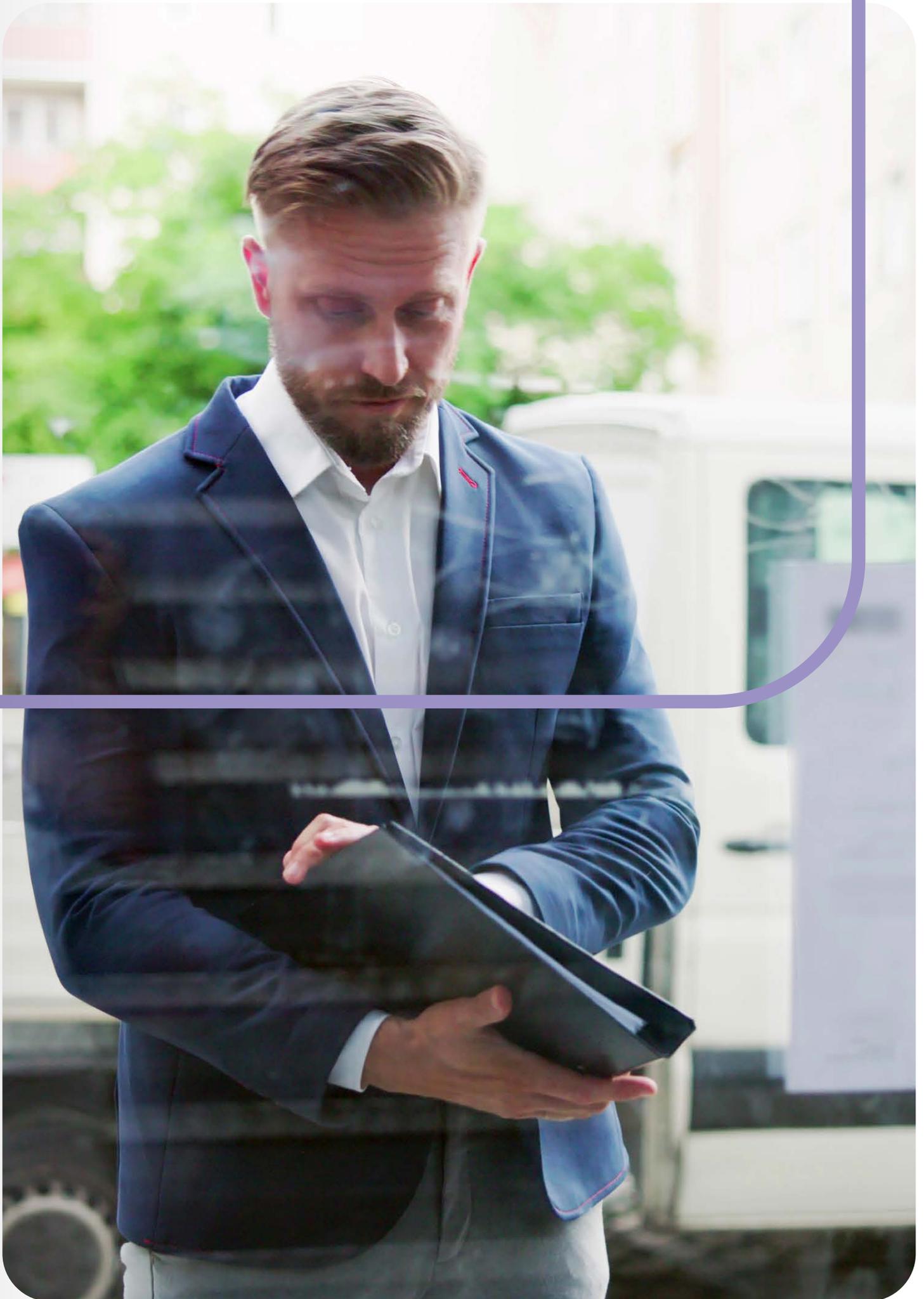
80. Some respondents felt that the term 'Basic Living Costs' as part of the definition of 'sustainable repayment' did not adequately reflect the reality of living costs and essential expenditures and set a low bar for payment arrangements that could still leave someone with a subsistence standard of living. This could potentially cause, or exacerbate existing vulnerabilities.
81. Many responses agreed on the importance of agents and firms facilitating access to debt advice provision by making active referrals rather than just signposting. This would enable people both to manage their debts and receive support with income maximisation, increasing ability to pay and benefiting all concerned. A suggestion was also made that evidence of multiple debts should be used as a trigger for an automatic referral to debt advice. The importance of this Standard was underlined by statistics showing that 38% of clients delayed seeking debt advice because they did not think anyone could help and 36% because they did not know where to find it.
82. Firms also sought clarification of the ECB's expectations for pausing cases and providing an extension to the compliance stage to enable someone to seek debt advice (APF5.7 and 5.8). Several noted that the statutory period of 60 days set by the Debt Respite Scheme (Breathing Space) should be the appropriate starting point and that allowing additional time beyond this could be counterproductive as the objective should always be to enable someone to repay their debt in the timeliest way possible.



## The ECB's response

83. Based on the feedback we received we have made significant changes to the way that ability to pay is framed and positioned in the final iteration of the Standards. The two separate sets of Standards have been consolidated into one overarching Vulnerability Standard which incorporates the core elements of the Ability to Pay requirements. The original ability to pay 'outcome' has been nested under the new headline vulnerability aim at FS11.ii). We have retained the distinct elements of the original ability to pay Standards to underscore the importance of agents carrying out affordability assessments as a core part of the enforcement process.
84. It is not our intention to change or undermine the requirement for an agent to seek payment in full. However, the Standards aim to ensure that someone is not pressured to pay in full or to agree to an unsustainable payment plan once it is clear that they are unable to do so. As we intended primarily to introduce additional safeguards for situations where someone has 'no ability to pay' or the 'ability to pay in part only' we can see that an 'ability to pay in full' category was potentially unhelpful. Consequently, we have removed this category to maintain the focus of the Standards on circumstances where there is a risk of someone experiencing harm.
85. The ECB strongly maintains that where a debt advice provider has carried out an objective assessment of ability to pay based on the SFS firms must take this into account. This was a requirement of the draft Standards for firms at APF5.11 (FS22). Based on what we heard we have supplemented the new Standards with a requirement that firms also record how a budget resulting from debt advice has been taken into account in determining the sustainability of a payment plan (FS25.3(i)).
86. There are compelling arguments for requiring consistent use of the Standard Financial Statement in enforcement, including the counterproductive impact of using a different scale to assess ability to pay to the one accepted by most of the debt 'ecosystem'. The ECB also recognises concerns that firms' bespoke I&E assessments could deliver inconsistent outcomes and that failing to take into account other debts, liabilities and priority expenditures risks an unsustainable payment plan that will break or cause harm.
87. However, the ECB does not intend to mandate use of the SFS. In our view it would be problematic to require firms always to accept or use it, where their clients, particularly High Court creditors, do not accept it and/or insist on repayment parameters that conflict with it. There are also some types of debt, such as criminal fines, where different mechanisms including set tariffs or legislative provisions are used to determine repayments. Nonetheless, we are aware that the SFS is accepted by some local authorities and that firms are beginning to adopt systems based on the principles of the SFS, suggesting that its use in enforcement is feasible.

88. Consequently, we believe that there is a longer-term need to develop a consistent, agreed approach to assessing ability to pay that is practicable in an enforcement context. We intend to collaborate with stakeholders in industry and debt advice as well as other key bodies like the IRRV, the Local Government Association, the British Parking Association and the Money and Pensions Service (MaPS) to understand what form this could take and how it might best be implemented. This work will also consider the potential for future alignment between the ECB Standards and the work of HM Government's Debt Management Function.
89. The new ability to pay Standards are underpinned by the principle that agents can take control of goods in lieu of payment where it is safe and appropriate to do so. The ECB recognises the complexity of this area and the tension between the desire to resolve more cases at compliance stage, the need to assess assets physically, and preservation of the agent's role and power to take control of goods where appropriate. While we recognise the ability to take goods, we want to underline the importance of other means of securing the debt in preference to this. Consequently, we have not made direct changes to the Standards in response to the points raised, but we will continue to work with stakeholders to explore this question.
90. The National Standards already provide protections for mobility vehicles or those belonging to 'blue badge' holders, as well as medical equipment and goods that are required for work or education. In complying with the new Vulnerability Standards, we will expect agents and firms to consider carefully whether it is an appropriate option to seize eligible goods, particularly vehicles. This is in view of the high risk that the doing so could exacerbate existing vulnerability, for example by making it challenging to access medical care or meet health or personal needs.
91. The ECB's intention is to ensure that someone has sufficient time to access debt advice before the case moves from compliance stage to enforcement. This should not supersede or supplement statutory provisions. However, our understanding is that the protections of the Debt Respite Scheme typically begin once debt advice has been provided or commenced and is not always recorded on case files. On this basis we do not anticipate a conflict with the Standard, but complying with the Standard will require firms to work collaboratively with debt advice providers. We have also noted HM Government's upcoming five-year review of the Debt Respite Scheme and will reflect any changes to the scheme as appropriate in future iterations of the Standards. We do not agree that there should be set 'triggers' for referrals to debt advice.
92. We agree that the definition of sustainable repayment should not give the impression that it is acceptable to leave someone with a subsistence standard of living while repaying their debt. Consequently, we have replaced 'basic living costs' with 'essential living costs', with the additional aim of closer alignment with the terminology used in the debt advice and financial services sectors. We have also listed some of the example expenditure categories and costs used in income and expenditure assessments while noting that this is not an exhaustive list.



## Question 5 – Do you have any comments on the draft Standards on Ability to Pay for Enforcement Firms?

93. Most responses were supportive of the Ability to Pay Standards for firms while reiterating many of the themes raised in relation to the Vulnerability Standards for firms that we have addressed earlier in this document. Challenges in relation to the accessibility and reliability of financial information and assessment of assets were frequently highlighted.
94. The general view was that the categories of ability to pay provided a sufficiently flexible framework to enable firms to make decisions on a case-by-case basis. Some thought that the Standards should be stronger and require firms always to use a consistent objective standard rather than their own income and expenditure forms and approaches to assessing ability to pay. Triggers for action were suggested, for example identification of a negative budget should automatically result in a case being returned to the creditor.
95. There was unease that the Standards could prevent firms and agents from seeking payment in full. It was noted that standard practice compliant with existing regulation is to seek payment in full first then within creditor timeframes before moving to assessment for potential vulnerability and considering an extended payment arrangement. Additional support is provided where appropriate and the case is returned to the creditor if all of these options fail. Questions were raised again about whether ultimate responsibility for decisions about ability to pay should rest with the firm, agent or creditor particularly where there is some ability to pay in part.
96. Some responses emphasised the importance of close ECB oversight to ensure that firms were complying with the Ability to Pay Standards and increasing the use of sustainable payment arrangements. This included specific proposals that firms should be required to report on the number of payment arrangements agreed and the proportion of broken agreements.
97. Both the ECB's overarching standards (FS1.14) and the new vulnerability standard (FS14.2) require firms to ensure that their approach to contracting, remuneration and KPI setting do not disincentivise compliance with the Standards. Many responses highlighted that the operational impacts of implementing the new Vulnerability and Ability to Pay Standards would necessitate a review of agent remuneration. The reason for this was the need for agents to spend more time on cases, potentially seeing lower financial returns in the short term. This was a key concern raised by agents who participated in the research who felt that without systems changing at firm level, it would be unfeasible to comply with them. It was noted that it would be even more challenging for agents working across multiple agencies on different terms.
98. APF5.5 required firms to attempt to reinstate a payment arrangement before conducting another enforcement visit when an instalment has been missed to avoid the debt reverting to immediate payment in full. There was some apprehension that this would result in a large number of payment plans being broken.

## The ECB's response

99. We are grateful for the constructive feedback on the Ability to Pay Standards for firms. We have outlined our response on some of these themes already on earlier questions.
100. On suggestions that we should require firms to report on payment arrangement numbers and the proportion of broken agreements, we will consider this when designing our data returns process in the light of the new Standards.
101. We have also updated the Standards to reflect that firms are always required to attempt to reinstate a payment plan before conducting a further enforcement visit where the case has been identified as involving vulnerability (FS24.).



## Question 6 – Do you have any comments on the draft Standards on Ability to Pay for Enforcement Agents, including the proposed application to third parties?

102. Most responses supported the Ability to Pay Standards for agents, recognising that they set clear expectations for responding when someone cannot pay and for managing interactions with third parties safely. However, some questioned whether the Standards are robust enough to shift current practice, particularly where agents have been reluctant to examine financial evidence and minimise checks to speed up doorstep interactions.
103. Several respondents felt the Standards should be more explicit in setting a threshold that, unless someone is clearly able to afford repayments, agents must carry out an ability to pay assessment. Others highlighted that agents often rely on creditor set timeframes rather than undertaking any meaningful affordability assessment, and that inconsistent approaches across firms and creditors will make uniform application of the Standards challenging.
104. Some respondents felt that agents should not be expected to conduct income and expenditure assessments at all, in view of the limited time and often challenging circumstances of an enforcement visit. They questioned how reliable financial information could be obtained during an enforcement visit and noted difficulties persuading debtors to share it. One suggested that standard procedure should be for agents to carry out basic checks and where they identified affordability concerns, refer cases back to their firm for a fuller review.
105. There was support for the requirement for agents to provide a justification for deciding that a payment arrangement is sustainable. However, in view of the risk of rapid, unexpected changes to financial circumstances there was nervousness about agents being held accountable for a payment arrangement that subsequently became unsustainable.
106. Although some welcomed the extension of the Standards to third parties, many responses raised concerns including fears that they would encourage deliberate involvement of third parties to frustrate or delay the enforcement process. Conversely, others felt that there was a risk that the Standards could encourage agents to engage with third parties without consent, pressuring them to assist with repayment and so they proposed that third parties should have the same ability to pay protections as the person subject to enforcement. There were also queries about whether the new Standards potentially weakened existing protections for third parties.

## The ECB's response

107. The ECB recognises that agents face some challenges in obtaining financial information and making an assessment of income and expenditure during an enforcement visit. However, we are also aware that there are approaches and tools already in use that would support agents to comply with this aspect of the Standards. For example, one agent who participated in the research commissioned by the ECB highlighted that they were able to direct the person subject to enforcement to an Artificial Intelligence enabled online income and expenditure tool. They found this particularly effective in obtaining and verifying information about the person's financial situation. We believe that the Standards set an appropriate bar, which allows some scope for different approaches to implementation and compliance.
108. The new Vulnerability Standards require agents to take into account and review evidence that they can assess during a visit and while a case remains with them. The ECB does not expect agents to be held accountable for future changes to someone's situation that make an agreement unsustainable. However, firms remain responsible for reviewing cases and ensuring payment arrangements remain sustainable over the longer term in line with FS23.
109. The intention of the Standards relating to third parties is not to encourage involvement of third parties either by agents or debtors. Instead, it aims to provide some of the protections of the Standards to third parties who become inadvertently involved in a more substantive way than simply being 'bystanders'. They are intended to strengthen and reinforce the provisions of the National Standards and existing statutory frameworks relating to third parties rather than superseding them.

## Question 7 – Do you have any general comments on the draft Standards or the ECB’s approach to developing them, as set out in this consultation paper?

110. Responses to this question covered a range of topics, which have been addressed earlier in this paper. These included the need for tailored approaches to different debt types and avoiding encouragement of vexatious complaints and wilful non-payment.
111. Nearly all responses referenced the challenges posed by creditors’ requirements and acknowledged the tensions that this would create in complying with the Standards, but only one response was fundamentally opposed to the Standards. The IRRV stated that they feel that the ECB’s approach is incompatible with Local Authorities’ right to determine their own enforcement criteria in line with their financial objectives and that using the new Vulnerability Standards would undermine the principles of localism and local decision-making.
112. The IRRV also took the view that if, as a result of the ECB’s Standards, Enforcement Agencies approached their work in a different manner to the approach in their existing contracts with Local Authorities they would be in breach of contract.
113. We also heard from some individual local authorities, including accredited in-house teams. Their responses confirmed that although there are some challenges, including implementation costs and potential delays to repayment, the Vulnerability Standards accord with the principles of their own vulnerability frameworks and approach to protecting vulnerable residents.
114. Both local authorities and utilities creditors highlighted the challenges they face which can lead to unsuitable cases being referred to enforcement. Chief among these was customers failing to engage, meaning that they do not have the information needed to approach the case appropriately, including the potential for more flexible repayment terms to be offered. They also emphasised the importance of two-way information sharing as enforcement firms and agents should be reporting vulnerability to them when identified.
115. Firms noted that, in practice ‘genuine inability to pay due to a lack of assets or means’ will often lead to payment plans or returns, but that clients sometimes have ‘unrealistic expectations’ of timeframes for collections. The issue of ‘case recycling’ was also raised by some. This is the practice where, if one firm has been unsuccessful in recovering a debt and returned the case, the creditor will pass the case back out to one or more other firms to enforce. This typically happens without any information being shared with the new firms or agents, even where the previous firm had identified vulnerability. This issue was also highlighted in our research with agents who expressed particular frustration about how their efforts to support vulnerable people were undermined by a lack of continuity and important information being lost.
116. The potential for the Standards to act as a lever for change and improvement was highlighted by many respondents, including suggestions that the impact of more cases being returned to creditors could lead to improvements and better checks prior to passing cases to enforcement. However, there was some apprehension about the extent to which the ECB expected firms to influence their clients to adhere to the Standards and many felt that creditors would need to share the ‘evidential burden’ with firms.



## The ECB's response

117. The ECB has previously stated our intention to work with creditors to improve information sharing with firms and earlier identification of vulnerability 'upstream' to reduce the number of unsuitable cases being passed to enforcement. We reiterate the expectation that firms should aim to work with their clients to increase awareness of the ECB's Vulnerability Standards and their need to comply with them as an accredited firm.
118. The ECB is confident that the new Vulnerability Standards do not undermine the principles of local decision making or impede the ability of local authorities to determine their individual approach to collecting local taxes. FS14.4 (i) requires firms to outline the requirements set by creditors in relation to acceptable payment parameters and the process which should be followed where the repayment terms on a given case fall outside of these. Our Standards do not seek to influence the terms of these parameters.
119. More generally, the IRRV's response helps to highlight some of the concerns noted in other responses about creditor expectations making it harder to carry out enforcement fairly. This response was markedly different in tone to other responses from across the sector and shows the need for progress in creditor engagement with these important issues.

## **Question 8 – Are there proposals in this consultation paper that you think would impose a cost or other burden that is disproportionate to the intended outcome? Are there alternative ways it could be achieved?**

120. In line with general support for the aims of the Standards, no responses explicitly stated that the potential costs were disproportionate to the intended outcomes. Feedback from firms highlighted that many already have the foundations for the necessary policies and processes in place. Consequently, all indications are that the biggest proportion of the costs of implementation and compliance will be primarily in updating IT systems, particularly for data recording and maintenance of longer payment plans, as well as providing training and new tools such as technology-based income and expenditure assessments. Only one respondent provided any specific costing estimates. Most felt that the costs of implementation would fall harder on smaller and less well-resourced firms.
121. Several responses noted the challenges posed by the static fee scale and a system that is not currently set up to support payment plans at Compliance. There were some doubts about whether the anticipated increase in collections resulting from more use of sustainable payment plans would offset the costs as expected. This was on top of risks that loss of income and additional stress on staff, particularly welfare and complaints teams, could lead to a lower quality of customer service as well as a short-term reduction in productivity.
122. As discussed earlier in this paper, changes to agent remuneration was viewed as one of the most significant changes that would be needed. The potential impacts of reduced revenue or slower debt recovery on creditors were also highlighted, particularly for Local Authorities, including accredited in-house teams, when taken in conjunction with HM Government's proposed changes to council tax collection.
123. There were suggestions that the ECB should carry out an economic impact assessment before implementing the Standards.

## **The ECB's response**

124. The ECB recognises that there will be up-front costs of implementing the Standards. We will continue to develop our approach to oversight, ensuring that our expectations are proportionate to the different sizes and business models of accredited firms. We have been guided by these considerations in developing Standards which are primarily outcomes focused and provide scope for different firms to develop strategies and approaches that are appropriate for their work and organisation. We consider that the standards strike an appropriate balance between protecting vulnerable members of the public, whilst not placing a disproportionate cost burden on the industry.
125. We do not intend to carry out an economic impact assessment. We consider the scale of work involved and potential costs to the ECB and industry, as well as further delays to the introduction of much-needed new Standards, to be disproportionate.

## Question 9 – Do you have any comments on the proposed approach to implementing the Standards?

126. A few responses proposed that the timeline for implementing the Standards should be extended. One based this on the scale of changes to the draft Standards that the respondent believed to be necessary and others due to the desire for the ECB to carry out an economic impact assessment. One response proposed shortening the timeline considering the existing delay due to the ECB's previous decision to give extra time to developing the Standards because of their complexity and the importance of getting them right.

### The ECB's response

127. While we acknowledge these views, we do not intend to change the proposed implementation timeline. We have undertaken an extensive programme of engagement and consultation to develop the final Standards and there is now substantive agreement in many areas. Implementation will require firms to undertake a significant change programme, and agents and staff will need training and support to understand their roles and responsibilities in putting the Standards into practice.

128. Therefore, we consider the proposed timeline appropriate to the scale of the necessary changes. ECB accredited enforcement firms and local authority in-house teams will now have a period of three months, ending 23rd June, to develop their plans for implementing the changes required to enable them, and the enforcement agents and frontline staff who work for them, to comply with the Standards. At this point they should be prepared to provide the ECB with an assessment of their readiness (if requested). We expect to be reviewing a selection of these plans through our pilot compliance visit programme. Firms will have a further six months to deliver the implementation plans fully before the Standards come into force in January 2027.



# Appendix A

## Summary of key changes to the Vulnerability Standards

The key changes to the Standards are set out in the summary table below. Further detail about these changes and the rationale for them is provided in the relevant sections of this paper.

Standard	Change	Rationale at
Definition	<b>Vulnerability:</b> Updated the definition of vulnerability to make it simpler, avoiding circularity and improving clarity and accessibility, and removed the category of 'potential' vulnerability.	Q1.
Definition	<b>Harm:</b> Revised the definition of harm to reinforce the focus on harm occurring during the enforcement process and address concerns about positioning enforcement as an inherently harmful process. Removed the categories of social and relational harm.	Q1.
FS 19.1 (i)	Clarified that where a payment plan is acceptable to a creditor and a credible offer is made at Compliance, firms should provide additional time where needed to consider this.	Q2.
AS16.	Clarified and revised expectations that agents should identify and respond to vulnerability and ability to pay in third parties by using 'observable indicators' rather than being required to solicit information proactively or making a full vulnerability assessment.	Q3.
Definition	Updated language used in the definition of 'sustainable repayment' from 'basic costs' to 'essential costs' to align with terminology used more widely in the debt advice and financial sectors and clarify expectations that subsistence level living standards are not considered 'sustainable'.	Q4.
FS 25.3 (i) (new)	Strengthened the requirement for firms to take into account income and expenditure assessments prepared by debt advice providers to add a requirement that firms should also record how this has been done.	Q5.
FS24. (Formerly APF5.5)	Updated to specify that firms are always required to attempt to reinstate a payment plan after a missed payment before moving to enforcement where vulnerability has been identified, addressing concerns that this would increase overall numbers of broken payment arrangements.	Q5.
Definition	<b>Debt Advice Provider:</b> Introduced a definition consistent with that used in the Debt Respite Scheme (Breathing Space).	N/A

## Appendix B

### List of non confidential respondents:

- Birmingham City Council
- Bristow and Sutor
- CDER Group
- Civil Enforcement Association
- Citizens Advice South Warwickshire
- ColX Group
- Court Enforcement Services
- DCBL
- Debt Justice
- Debt Managers Standards Association Limited (DEMOSA)
- Durham County Council
- Excel Civil Enforcement
- Flintshire County Council
- E.On Next
- High Court Enforcement Officers Association
- Institute of Money Advisers
- Institute of Revenue and Ratings Valuation
- Just
- Marston Holdings Limited
- Money and Mental Health Policy Institute
- Money and Pensions Service
- Money Wellness
- Newlyn
- Rundles
- South West London Law Centres
- Taking Control Coalition
- Vulnerability Registration Service
- Wilson and Roe



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**Enforcement Conduct Board**

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

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