

## ECB Board Meeting – 4 March 2026

Venue: Teams

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

**In attendance:** Ayesha Begum, Claire Evans, Catherine Khan, Leonora Miles, David Parkin, Holly Perry (minutes), Michelle Pinnock, Louise Rubin, Elizabeth Thompson

### Minutes

#### Item 1: Welcome, apologies and declarations

1. The Chair welcomed all present, particularly Ayesha Begum, Catherine Khan and Michelle Pinnock, who were observing the meeting.
2. There were no new declarations of interest.

#### Item 2: Minutes of the previous meeting

3. The minutes of the meeting held on 21 January 2026 were **agreed** as an accurate record. Some adjustments were agreed to the sections of the minutes marked for redaction.
4. The Board confirmed the dates of the Board meetings proposed for 2027/28.

#### Item 3: Matters arising

5. There were no matters arising; the Board **noted** the action tracker and Board forward agendas.

#### Item 4: Chief Executive's report

6. The Chief Executive presented the paper, providing an update on the following developments that had emerged since the papers had been issued:
  - i. The judicial review had been refused permission at first instance and a costs order had been awarded. The claimant had subsequently requested an oral hearing with the judge to challenge the outcome.
  - ii. The Director of Policy and Oversight had recently returned from maternity leave, and following interviews held on 23 and 26 February, the ECB had successfully recruited a Complaints Investigator and a Risk and Compliance Manager, both of whom would join the team in April 2026.
  - iii. In relation to discussions with the CEOs of the largest enforcements firms that the ECB CEO had been undertaking ahead of issuing the draft

business plan and budget 2026/27 for consultation, these had been challenging and robust – with particular concern having been raised at the MoJ fee rise not having yet materialised. Senior ECB staff would be meeting with representatives of CIVEA and HCEOA in late March to run through the detail of the proposed budget, and the assumptions. In particular, the team would explain the modelling underpinning the resource attached to the ECB’s complaints handling function.

7. The Board thanked the Chief Executive for the additional items and the following points were raised in discussion:

*Budget 2026/27*

- i. On the budget, figures were now available from nearly all firms on turnover in 2025, and this appeared to be down marginally
- ii. The Board acknowledged the challenging stakeholder environment and looked forward to a further update at its April meeting, where the final draft business plan and budget would be presented, alongside the consultation responses, ahead of final approval.

*Statutory underpinning*

- iii. On statutory underpinning, the Board considered what might help keep up the pressure on the Government and a number of suggestions were made including: (a) Parliamentary activity such as writing to the Leader of the House, and the Chair of the Treasury Select Committee on financial inclusion; (b) liaising with officials to discuss how the proposed legislation might be better framed (perhaps with an emphasis on growth); (c) whether or not to begin taking a more challenging approach with Government; (d) how much further the ECB might leverage the debt advice sector; (e) engaging HM Treasury, on the basis that statutory underpinning would help to safeguard collections; (f) using Parliamentary Questions or PMQs; (g) other routes, such as a Private Member’s Bill.

*Complaints*

- iv. The Board noted the excellent content on complaints set out in the report.
- v. It was noted that the complaints rate of 0.1% was very low indeed, and any rise in the ECB’s profile would likely result in an increased intake. This was being factored into the resource modelling for 2026/27 currently underway.
- vi. A significant amount of work had also been done on benchmarking the ECB’s approach to second-tier complaints handling with other sectors, which supported the view that the ECB’s approach was realistic.

8. The Board **noted** the Chief Executive’s report.

**Item 5: ECB Standards on Vulnerability and Ability to Pay: Standards and Consultation Response**

9. The Policy Manager presented the paper, and explained that the Board was being asked to approve the near final draft of the Standards, the consultation response as well as agreement to publication of the final reports of the independent research.
10. Since the January Board meeting, the team had made some final revisions to the Standards – as detailed at paragraph 8 of the paper – including drafting changes to the definition of harm and the definition of debt advice, and the approach to creditor approval of payment plans and assessment of assets.
11. The had ECB received a considerable amount of feedback as part of the consultation, and had approached the consultation response document thematically, rather than attributing the feedback. The team was confident in the final product, and confident that it had the evidence to support both the report and the standards themselves.
12. The following points were raised in discussion:
  - i. It was clear that the significant investment in time in consulting with stakeholders – both in the enforcement sector and the debt advice sector – had paid off, with a good degree of consensus on the need for the Standards, and limited tension overall.
  - ii. The research feedback was particularly significant, and supported the need for statutory underpinning. As a group of documents, the package was compelling. Consideration needed to be given to what further value the ECB could extract from the research, including in engaging Parliamentarians.
  - iii. A question was raised about the possible vulnerability of enforcement agents themselves and the extent to which the ECB had access to information on this. The Board agreed that this was difficult, given the ECB did not regulate the individuals – more work needed to be done to engage agents directly (**action**).
  - iv. Establishing a way to monitor implementation of the Standards on the ground would be key, including identifying ways of finding out when things were going wrong and how to get them back on track. It would be important for agents not to be incentivised by firms to behave in ways that ran counter to the Standards, and how the ECB would identify when this was happening.
  - v. Ensuring that the process remained iterative would be important – while there might be a call from some stakeholders for prescription, it would be key to look at how the Standards were operating on the ground, and make changes based on experience.
  - vi. In relation to legal risk, the ECB had taken advice from regulatory lawyers who had worked closely with the team in finalising the Standards.

13. The Board **agreed** the final draft of the vulnerability standards consultation response, and the final draft Standards and definitions, subject to a minor amendment required to one of the standards, which was **delegated** to the Chair and Chief Executive to agree. The Board also **agreed** the timelines for the launch and implementation of the Standards (publication later in March, enforcement from January 2027, with a transition period in 2026), and **agreed** publication of the final reports of the independent research with enforcement agents and people with lived experience of enforcement.
14. The Board thanked the Policy Manager for her work on developing the Standards over a considerable period of time, and for her work in engagement with the enforcement and debt sectors to help bring the Standards to fruition. The publication of the Standards would be a significant milestone for the ECB.

#### **Item 6: Thematic Review – Linking & Fees: Findings and Recommendations**

15. The Director of Government and Risk (DGR) and the Risk and Compliance Principal (RCP) presented the paper, which provided the Board with the headline findings of the Thematic Review (TR) into linking and fee charging by the enforcement industry. The paper also set out proposed next steps on the Thematic Review. The full report on the process would be presented to the Board in April.
16. The Board **noted** the outcome of the review and looked forward to receiving the final report in April. It was **agreed** that the report should be published in May, and then a period of time set aside to allow the sector to consider the implications before a consultation on fee guidance was issued.
17. The Board thanked colleagues for their work, which provided a strong platform for the ECB to roll out its plans for future oversight.

#### **Item 7: Creditor influencing strategy**

18. The Chief Executive presented the paper, explaining that the contents built on the discussions at the Board's October 2025 Board meeting, where there had been a clear steer towards the ECB doing more to take advantage of the 'upstream' opportunities associated with influencing the behaviour of creditors, and the Board's January 2026 meeting, where a number of areas related to creditor influencing had been discussed, including the opportunity to engage creditors. Paragraph 6 of the paper set out a list of potential areas where creditor behaviour could have a positive input to fair enforcement. It was noted that the IRRV continued to express concern about the ECB attempting to have any locus in this area, and so the ECB would need to approach the work in terms of seeking to influence Local Authorities thoughtfully.

19. The following points were raised in discussion:

- i. A 'summary on a page' explaining why influencing creditor behaviour was important for the ECB's mission would be drafted (**action**).
- ii. Encouraging others to sponsor an award for 'good creditor behaviour' would be considered – encouraging local authorities to showcase good creditor behaviour.
- iii. Strategically, and given there was little resource allocated to the work in 2026/27, targeting two or three big organisations might be most effective – such as HM Courts and Tribunal Service, the road creditor bodies, and procurement authorities. **HMCTS's objection to fee linking was driving negative impacts on people experiencing enforcement and consideration should be given to how to change to this.**
- iv. In prioritising it was important to consider the volume of cases rather than simply the value of cases. In addition, differentiating between commercial and state sectors might be helpful.
- v. Analysing contracts with firms would help with monitoring arrangements – looking at the gap between how things were meant to work, and how they were actually working on the ground. Complaints data would also be an important source of intelligence in relation to bad practice.
- vi. A discussion at a forthcoming stakeholder forum might also be helpful – looking at which creditors were driving poor performance.
- vii. Gathering evidence from a range of sources would be necessary, and would take a bit of time. Another important aspect of the creditor influencing strategy should be emphasising partnership with the debt advice sector – StepChange were known to be doing work in this area.
- viii. At the appropriate stage, wider communications on the ECB's work in this area would be planned and this would emphasise that the ECB was doing the work in a cost effective and targeted way.

20. The Board **agreed** that the discussion had been helpful and underlined the importance of deepening the ECB's understanding of the creditor landscape, and identifying which creditor bodies were driving harm into the sector and which were doing good work. It would be important to focus on activities that would make a real difference. The topic would be returned to at the June meeting, with a focus on (i) the ECB's rationale for doing the work and (ii) the target creditor groups to influence (**action**). The executive would look to invite one of the larger creditors - HMCTS or TfL - to the April Board (**action**).

#### **Item 8: Review of Expenses policy**

21. The Director of Corporate Services presented the proposed amendments to the ECB expenses policy, noting the review undertaken in 2025 to ensure compliance with current tax and National insurance legislation, as well as HMRC guidance. Subject to one clarification in relation to claiming taxi journeys where there was a public transport option, the Board **agreed** the changes and the new expense policy would be rolled out to staff.

### **Item 9: AOB**

22. There were no other items of business.

### **Item 10: Reflection section**

23. The Board reflected on the meeting and agreed that it had been a good meeting with a high-quality set of papers. The agreement to establish a sub-group of Board members to support the executive in one work area was a helpful development, and it was agreed that further thought should be given to the 'Board leads' system and how best the executive could work with Board members outside meetings (**action**). It was agreed that a sub-group for complaints, and one for development of the budget next year would be helpful.

### **Private session**

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