

ECB Board Meeting – Wednesday 22 April 2026

Venue: Kingsley Napley, 20 Bonhill Street, London EC2A 4DN

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

Apologies: Ged Curran

In attendance: ECB - David Parkin, Holly Perry (minutes), Louise Rubin, Hannah Semple, Elizabeth Thompson
External accountants - Evan Carter, David Sarney (item 5)

Minutes

Item 1: Welcome, apologies and declarations

1. The Chair welcomed all present. Apologies had been received from Ged Curran, whose written comments would be fed into discussion at the appropriate points.

Item 2: Minutes of the previous meeting

2. The minutes of 4 March 2026 were **agreed** as an accurate record of the meeting, subject to some minor drafting amendments. The redactions ahead of publication were agreed.

Item 3: Matters arising

3. The Board **noted** the action tracker and Board forward agendas. Action 4 would now be closed.

Item 4: Chief Executive's report

4. The Chief Executive presented the report and the following points were raised in discussion:

Statutory powers

- i. The Board noted that statutory underpinning for the ECB was now not likely to be included in the King's Speech set for 13 May.
- ii. The sub group of Board established to further plan the ECB's approach to the ongoing delay had recently met for a productive meeting.

Other matters

- iii. The tragic death of a County Court bailiff was discussed, and the Board expressed its deepest sympathy for the bailiff's family, friends and colleagues. The Board considered what more the ECB might do in this space, such as looking at best practice in other professions that entered people's homes in difficult circumstances (e.g. police, social workers). In particular, the team would continue to engage with the HCEOA and CIVEA to identify opportunities to support agent safety (**action**). The ECB's data

was showing an increase in assaults, in keeping with the general rise in society of attacks on frontline staff in many sectors. Firms needed to ensure that proper risk assessments were in place, in line with the ECB's standards requiring firms to protect agents. It was noted that fatal instances such as this were very rare indeed, but serious assaults were increasing.

- iv. On the forthcoming complaints sessions with industry, it would be important for the ECB to be clear on the aims – making the case for quicker and better complaints handling at the first tier by looking at learnings from the ECB's findings so far, as well as learning for the ECB from firms about the challenges they faced. Follow up by way of a written communication to firms would be sensible. The sessions would also be important for helping to scope the process and efficiency review.
- v. The Board discussed the merits and de-merits of the assessment 'partially upheld' in complaints findings. On the one hand, firms might consider that they had been partly vindicated, on the other, the ECB was making clear that there had been a breach of standards at least in part. An alternative categorisation might be 'breach of standards upheld'. The point would be considered further as part of the process and efficiency review (**action**).
- vi. The Board noted industry concerns about duplication of complaints - there were two issues: firstly, premature complaints which had then returned to the ECB had been counted twice had been included in our insights report - a system fix had now been made, and in future the insights report would separate out the number of premature complaints from the overall total; the second issue was that firms' reporting showed multiple case numbers assigned to one complaint, giving the impression of wide scale duplicate complaints. This issue related to the way data had been extracted for firms and had not impacted the ECB's resource modelling. The extraction issue was also being rectified in the system and firms would soon have access to a reporting dashboard to give them better information.
- vii. The Board approved the capitalisation policy set out at paragraphs 9 and 10 of the paper – whereby IT equipment with an individual value above £1,000 would be capitalised and depreciated over a three-year period.

5. The Board **noted** the Chief Executive's report.

Item 5: Final draft business plan and budget 2026/27

6. The Chief Executive presented a paper setting out the outcome of the business plan and budget engagement and consultation process along with a proposed approach to the final business plan and budget approval. The proposal was to set the 2026/27 budget at £1.77m (from £1.96m, which was the draft budget on which the ECB had consulted) and the levy down to 0.64% (from 0.70%, on which the ECB had consulted).

7. The Board discussed the paper and noted the following points:

Overarching comments

- i. The consultation had been the subject of targeted engagement as well as public consultation. The ECB received 16 responses to the consultation, double the number that had responded the previous year, as well as further informal feedback.

- ii. There had been considerable challenge in relation to both the content of the draft business plan, and the draft budget. The main areas of challenge related to: (a) a perception of mission creep in relation to the proposed work on creditors (b) a view that the demographic research was not necessary and would not represent value to industry (c) that the ECB was not sufficiently pursuing efficiencies in its operations (d) a view that the proposed reserves and contingency budget was excessive and (e) the resource modelling and performance expectations in relation to delivery of the complaints function.
- iii. The Board noted that turnover in 2025 had remained stable, and the recently-announced fee increase of 5% would not in fact result in a 5% increase in income for firms given offsetting changes.
- iv. Taking all of this into account, the Board agreed that it was important to take heed of the considerable disquiet regarding the scale of the proposed rise in the levy, and that there was a case for making savings on the budget consulted on where possible. Nevertheless, it was also noted that the ECB has a clear and important mission and the data showed that there were important issues that needed attention, and that the ECB's role and remit had been misunderstood by some of the respondents.

Budget

8. The consultation document detailed the larger discretionary areas of spend and the Board discussed the proposed way forward on each of these areas - the following points were agreed:
 - Training budget - £10k reduction from £35k to £25k;
 - External audit – to be removed for 2026/27 – reduction of £10-20k;
 - Demographic research – reduction of £30k from £40k to £10k;
 - Insurance – reduction of £9k; and
 - Complaints team resourcing – holding back the additional Complaints Investigator until after the process and efficiency review – saving of £32k.
9. The Board considered that it was vital to make progress on demographic research, as knowing who the people were who were subject to enforcement was key for systemic change and best focusing the ECB's interventions. In view of the feedback received, the Board considered that £10k would be sufficient for 2026/27 for a scoping exercise – for the ECB to undertake an assessment of what data was already available e.g. via debt advice charities - and starting the work on ascertaining what interventions might be workable for the ECB in future years, in collaboration with other stakeholders.
10. The Board noted that by holding back the additional resource on complaints, inroads on the backlog would not be possible. At the same time, volumes continued to increase, with complaints received projected to be over 100 for April. As part of the process and efficiency review and the complaints workshops, firms would be encouraged to prioritise resolving cases at stage one rather than – in some cases - strongly contest the ECB's findings, as this had the effect of increasing resource requirements in the team and driving up levy costs. It was suggested that the CEO write to CIVEA and HCEOA to set out the Board's decision on holding back the additional resource, making clear this was on the understanding that firms assist by focusing on getting it 'right first time' (**action**). Should volumes continue at over 100 per month for three months' running, the Board would revisit the decision on resourcing.

11. The Board discussed how best to share learnings on complaints with firms. Running workshops on a six-monthly basis might assist, to include consideration of the more egregious examples of bad practice.
12. The Board **approved** the final budget figure of £1.78m, which represented a levy of around 0.64% of turnover.
13. The Board **agreed** that the final Business Plan and Budget and consultation response document would be circulated to the Board by correspondence, with final approval prior to publication **delegated** to the Chair and Chief Executive.

Item 6: Data Return 3 – July to December 2025

14. The Director of Government and Risk presented the paper and report, which provided the findings from Data Returns (DR) submitted by accredited firms for the six months from 1 July to 31 December 2025. This was the ECB's third DR. The Board were invited to make observations on the data set out in DR3 (Annex A), and also comment on what data they would like to see introduced in future DRs (Annex B provided key statistics over time, which provided some early trends across the first three data returns). The following points were raised in discussion:

Comments on DR3

- i. The Board noted that a high-level, more visible dashboard was in development, and would be ready for DR4 later in the autumn. The ECB was also in discussions with industry on whether the DR might in future provide more clarity on how many people in debt were involved in the case-driven facts and figures in the DR.
- ii. Vulnerability had been identified in 203,000 cases, which was an increase of almost 15% on DR2. However, over the same period, support offered for vulnerability had dropped by 15%. The number of times a case was returned to a creditor for reasons of vulnerability had also dropped by 15%. The Board asked if the firms could be asked for an explanation (**action**).
- iii. While the number of assaults on EAs had remained the same as DR2, the number of threatened assaults has risen by over 300%. Some of the increase may relate to improved reporting, which was to be welcomed, but this trend needed to be kept under review in future reports, because it was of significant concern.
- iv. The extent of missing Body Worn Video (BWV) at 9% was unacceptable and concerning; in future reports to the Board, it would be helpful to set out the data range of missing BWV returns in the DR to see which firms performed well and which performed poorly on this metric. Data held in the complaints team about missing BWV would be checked to triangulate the figures and further thought would be given to how to interrogate the problem and drive improvement – it was felt that the figures should be much lower. The Board asked for a further discussion on the issue - including what other data and intelligence was held and what could be done to drive improvement in the near term – at the June Board meeting (**action**).
- v. The Board requested further information in relation to the two EAs who had been dismissed in the period (**action**).
- vi. In respect of the local authority DR, the first returns they had submitted, there were no significant points yet to be drawn out from their much smaller sample

size than the private sector DR, except that the figures on vulnerability identified and support provided were higher.

- vii. The executive was invited to come back to Board with thoughts on how to share highlights of the data on a six-monthly basis with key audiences, which would include a narrative one-pager on what the DR was telling us (**action**).

Future reporting

- viii. The Board agreed that the human voice was important – that a narrative to accompany the data, with some case studies, would be helpful.
- ix. Reporting back on how long firms took to handle complaints e.g. 5 days, 10 days, 20 days etc would be helpful data to collect in future.

15. The Board **noted** the data return.

Item 7: [REDACTED]

Item 8: Policy review – Draft ECB leave policy

16. The Director of Corporate Services presented the proposed leave policy for the ECB. Subject to clarification in relation to the following points, the Board **agreed** the policy for rolling out to staff:
- Clarity on who was responsible for authorising discretionary leave (confirmed to be either the Chief Executive or Director of Corporate Services);
 - Redrafting of the section on public and civic duties; and
 - Reference to be included to leave related to menopause and perimenopause.

Item 9: AOB

17. There was no other business.

Item 10: Reflection session

18. The Board reflected on the meeting and agreed that it had been very productive, and that the papers had been of a high standard, which had made for an efficient and effective set of discussions and decisions.

Private session

19. The Board met for a private session after the main Board, at which the ‘Board leads’ for 2026/27 were agreed, and the cost of living pay award for staff was also agreed. Further work would be undertaken on the pay bands, and this item was remitted back to the Board for further discussion at a future meeting (**action**).

Stakeholder session – creditor session

20. The Board held a discussion with the Head of Enforcement at National Highways, to hear about priorities and possible areas of future collaboration.