ECB Board Meeting – Wednesday 3 June 2026

Venue: Teams

Member attendance:	Catherine Brown (Chair), Alan Cavill, Delroyy Corinaldi, Gerard Curran, Althea Efunshile, Caroline Wallace, Chris Nichols
Apologies:	None
In attendance:	Lindsey Cairns, Claire Evans, Paul Mellonby, David Parkin, Holly Perry (minutes), Louise Rubin, Hannah Semple, Lana Al-khozali

DRAFT Minutes

Item 1: Welcome, apologies and declarations

1. The Chair welcomed all present, including Paul Mellonby and Lana Al-khozali who were observing the meeting, and also Lindsey Cairns.

2. There were no new declarations of interest to record.

Item 2: Minutes of the previous meeting

3. The minutes of 22 April 2026 were **agreed** as an accurate record of the meeting subject to two minor drafting amendments.

Item 3: Matters arising

4. The Board **noted** the action tracker and Board forward agendas.

   Missing Body Worn Video

5. The Board requested an update on the 9% rate of missing Body Worn Video (BWV), discussed as part of the data returns item considered at the last meeting The following oral update was provided:
   i. The firms had been contacted, given the ECB Standards contained a standard on retention. There were varying periods of retention of BWV. Some firms allowed long periods for complaints to be raised, which meant that during that period, sometimes BWV was deleted. Others had less generous complaints periods. Some firms cited technical issues which resulted in BWV going missing. There was some correlation (but not entirely) between those firms with high levels of missing BWV and firms engaging high levels of self-employed agents (SEAs). There was potential linkage here to issues of control over SEAs.
   ii. The Board agreed that missing BWV was unacceptable and was a significant risk area, and would need to be incorporated within the

ECB's approach to oversight. The Board noted that at the other end of the spectrum, some firms had reported no missing BWV, so it was not unavoidable.

iii. There were also positive agent safety considerations with regard to BWV – it helped firms to protect agents.

iv. Some communications work would be helpful, perhaps discussing the topic in more detail at a stakeholder group meeting, and adding information on BWV into the ECB's standard lines for external presentations.

v. The Board requested a paper on BWV and the outcome of discussions with firms at its next meeting, to include the communications angle, and focusing on a holistic approach to tacking the issue (**action**).

Further points arising from the data returns item at April Board

6. The data returns item discussed at the April Board had also highlighted an increase in the number of cases of Vulnerability and Ability to Pay (V&A2P) however a corresponding reduction in support and number of cases returned to creditors. Further work was being carried out with firms to establish why this was.

7. In addition, the Board had asked about the reported two agents who had been dismissed. We awaited confirmation, but one related to an ongoing potentially criminal matter with an EA. In this latter case, the Board asked if an EAC2 was being pursued by the firm, and the CEO responded that the ECB would do this as a test case if the firm did not (the ECB had seen the BWV footage, and the case was compelling).

Item 4: Chief Executive's report

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

   i. The Board noted that the current financial year's levy payments had started to come in, however only one firm out of the top eight had paid on time and in full. This had led to the ECB holding less than two months' reserves in the bank at the start of the new financial year, and was a factor to be considered when planning the reserves position for 2027/28.

   ii. A number of firms had asked to pay by quarterly instalment. This was a marked increase on previous years, when only one firm had requested a payment plan. This would have cash flow implications and also increased the administrative burden on the ECB in terms of managing levy payments. In future years, the ECB may need to add an administrative charge for those firms wishing to pay by instalment (or a discount for firms that paid in full).

iii. The increase in subject access requests was noted, and the Board requested legal advice about charging, as well as the possible options for how such a small organisation might proportionately go about handling voluminous requests (**action**).
iv. The impact of the recent changes to employment rights was noted, and the Board were reassured that the ECB's employment policies reflected the latest statutory position. The team had the support of an external HR adviser, who assisted with ensuring policies were kept up to date and also provided advice on the drafting of new policies.
v. Some very positive feedback about the ECB and its work had been received at a recent meeting of a regional Money Advisory Group, which ECB colleagues had attended.

9. The Board **noted** the Chief Executive's report and approved the amendment to the expenses policy, increasing the mileage reimbursement rate by 10p, in line with the updated HMRC limit of 55p per mile.

Item 5: Oral update on statutory powers

10. The CEO provided an oral update on progress.
    i. Red Rose Associates – a public affairs advisory firm - had been appointed to assist the ECB with its activities on statutory powers. The Private Members Ballot had not provided a promising avenue to pursue statutory underpinning.
    ii. Given it had now been a year since the Government had announced its intention to deliver statutory underpinning, the ECB planned some proactive communications to keep up the momentum.

11. The Board **noted** the update.

Item 6: ECB Complaints update

12. The Director of Policy and Oversight and the Head of Complaints presented an update on the ECB's complaints service covering the period from its introduction on 1 January 2025 to 31 March 2026. The update also included a report on Demographic information, and an update on the process and efficiency review.

Complaints Trends and Analysis

13. The Head of Complaints opened by reporting some good news in terms of trends: the number of cases for further consideration now stood at fewer than 20 (the figure had been 80 in January 2026), noting that the appointment of the Complaints Assessor had been key to bringing down this number. In addition, 80% of cases were being cleared within 15 working days in relation to the ECB's decision on whether or not to investigate. The wait time for allocation of a case for investigation had also reduced from 5 months to 4 months.

14. In total, 103 cases had been investigated or resolved during the course of investigation, with 55% being upheld in some form or other. In a number of cases, the ECB's recommendations to firms had led to changes in firms' behaviour, directly impacting positively the experience of those subject to enforcement.

15. In five cases, the lack of BWV meant that the ECB had been unable to reach a finding on a complaint which led to findings against firms, underlining the importance of firms ensuring BWV is always used and available.

16. It was noted that complaints handling by firms was not where it needed to be and some firms were pushing back on the ECB's findings on complaints handling.

17. The Board welcomed the report, reiterating that our initial modelling, based on the previous system, had underestimated the volume of complaints that the ECB would receive. Other points that were raised in discussion included the following:
    i. It was vitally important to ensure that the learning from our complaints service was presented back to firms and that they collectively learned from it. Including the cases where firms were changing their policies and practices in responses to the ECB's recommendations.
    ii. Some firms were indicating that they are not prepared to deal with complaints where AI had been used by people to help them to formulate a complaint - this was unacceptable. AI had an important role to play in helping people to get complaints across and, used appropriately by the sector and ECB, potentially also in making dealing with complaints more efficient.
    iii. The number of premature complaints being received was still high and part of the process and efficiency review will look at ways to reduce this number. That said, this was not an area of particular resource strain for the ECB. The Board queried whether the reason so many premature complaints were being received was related to people finding firms' complaints processes difficult to engage with.
    iv. At paragraph 19, it was reported that 33 complaints related to organisations who were out of the remit of the ECB - it was clarified that most of these were local authorities, rather than non-accredited firms.
    v. It was agreed that it would be helpful for Annex A to be published at some stage as it provided rich and interesting evidence. This would help demonstrate the ECB's impact on fairer enforcement. The team would give further thought to whether and how that would be taken forward.
    vi. The ECB might benefit from a greater degree of analysis of complaints by firm to assist with identifying risk and help best focus oversight resource.
    vii. The Board was interested in understanding more about the range of practice across firms of different sizes.

Demographic report

18. The Head of Complaints explained that demographic data had been collected since November 2025, with a response rate of 65%. Annex B set out an initial breakdown of the demographic data, and the plan was to drill into the data further and to use this to focus the ECB's work in this area in the future. The following points were raised in discussion:

    viii. The Board noted that the response rate was both pleasing and surprising, and thanked the team for their efforts in making the collection of the data accessible for individuals. It showed what it might be possible for firms themselves to collect (noting that response rates were likely to be higher for the independent oversight body compared to the firms about which individuals were complaining).

    ix. The early reporting was encouraging, and could assist the ECB with understanding possible areas of weakness.

    x. In terms of age distribution of complainants, the high number of those in the 30 to 44 age group was noted.

    xi. As well as the information on geographical areas currently being collected and reported, it was suggested that a split by socio-economic group might be helpful, and this might be identifiable from an analysis of postcodes. It was noted that education level had originally been an area for inclusion, but had been removed.

    xii. The team noted that this report deliberately did not attempt to draw out any deeper analysis of the demographic data as the data was not yet reliable enough to draw any solid conclusions. However, in future the team intends to carry out deeper analysis, comparing this data to wider population trends.

    xiii. Board also noted the importance of drawing together the complaints demographic reporting with wider work on refreshing the components of the ECB data returns to include new requirements following the launch of the ECB's vulnerability standards. Board also noted the potential to look at further evidence sources for data on the demographics of people experiencing enforcement including information creditors might hold.

    xiv. The team will start scoping the demographic research later in 2026 and will report back to Board on their plans in this area when a plan has been developed for this work. (**action**).

Update on the process and efficiency review scope

19. The Director of Policy and Oversight presented the update, explaining that Annex C set out the team's thinking in relation to approaching the review, with a view to reporting in late 2026, and introducing the changes from early in 2027 - with any impact on resourcing or costs being known in time for consulting on and agreeing the new business plan and budget. It was noted that "quick wins" identified in the course of the review would be implemented as it went along where possible.

20. The content of the review would be informed by a mix of desk-based work, a sampling of some decisions, and modelling the impact of different options.

This should provide insight into the impact of the choices that were currently being made on the approach to complaints handling. There would also be qualitative inputs – from workshops and 'deep dives' with firms, and speaking to other second-tier complaints handlers. There would be some 'quick wins' but also an opportunity to trial some changes during the review process. Most importantly, with ever increasing demand, it would be key to find ways to do things differently and faster, to future-proof the complaints handling function.

21. The Board raised the following points in discussion:

xv. Whether there were sufficient external inputs to ensure a robust assessment, given the ECB was undertaking this as an internal review e.g. whether the ECB had all the necessary comparative data.
xvi. Whether the ECB wanted to be the 'complaint handler of last resort' – it was clarified that this was not the intention, but that, where appropriate, individuals would be encouraged to go to another body if one was applicable.
xvii. Whether there were options beyond Tizo, the current software provider, in relation to technological solutions. As part of the engagement with firms, the team would assess what other technologies might assist.
xviii. Whether the resourcing and timelines were optimistic – whether six months was really sufficient. The team would consider whether there were elements that could be outsourced, e.g. data analysis.
xix. It would also be important to engage the debt advice sector early on in the process. The team confirmed that it was giving thought to how best to engage the debt advice sector, as well as other complaints schemes.
xx. That it was important to establish what a reasonable caseload looked like, and approach this with granularity (e.g. looking at 'active caseload' versus 'passive caseload).
xxi. That there was a role for the ECB to facilitate the sharing of good practice across firms, and that this would be covered in the communications with firms.

22. The Board **noted** the Complaints Trends and Analysis report, the Demographic report and the update on the process and efficiency review.

Item 7: Any other business

23. The ECB's summary report on the Thematic Review was due to be published on 4 June (*post meeting note – now uploaded to the ECB's website:* Thematic-Review-of-Fee-Charging.pdf)

24. Delroy Corinaldi reported that he had shadowed an Enforcement Agent recently as part of his onboarding, and had found the experience informative and helpful.

Item 8: Reflection session

25. The Board reflected on the meeting and agreed that it had been very productive. Some helpful reflections were received from the new colleagues who had joined to observe the meeting.

26. The Board passed on its thanks to the whole team for their work on papers for the meeting, which had assisted with a good set of discussions.

Private session

27. The Board met for a private session after the main Board, at which it discussed the appointment of Senior Independent Director, considered an update on EDI work within the organisation, and reviewed and agreed a redundancy policy for the ECB.