ENFORCEMENT CONDUCT BOARD

ECB Board Meeting – 15 and 16 July 2026

Venue: Boardroom, Morgan's Hotel, Swansea SA1 1RR

Member attendance:	Catherine Brown (Chair), Alan Cavill, Delroy Corinaldi, Gerard Curran, Althea Efunshile, Caroline Wells and Chris Nichols (CEO)
In attendance:	David Parkin, Holly Perry (minutes), Louise Rubin, Hannah Semple, Elizabeth Thompson (via Teams, item 5)

Minutes

Item 1: Welcome, apologies and declarations

1. The Chair welcomed all present. No apologies had been received, and there were no new declarations of interest.

2. The Board congratulated Althea Efunshile on her appointment as the Board's Senior Independent Director.

Item 2: Minutes of the previous meeting

3. The minutes of 3 June 2026 were **agreed** as an accurate record of the meeting subject to the addition of Caroline Wells to the attendance list and the correction of a typographical error.

Item 3: Matters arising

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

Item 4: Chief Executive's report

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

   i. In relation to staffing, the Ministry of Justice (MoJ) had agreed to the extension of the secondment of the Director of Government and Risk to the end of September 2026, to be funded by the MoJ.
   ii. The Head of Complaints would be leaving at the end of August 2026, to be succeeded by the Complaints Manager who would take up the role on an interim basis, at least initially. The Complaints Assessor had been promoted to Complaints Investigator and a recruitment was underway for her successor.
   iii. In relation to the financial position, all the large enforcement firms had now paid their 2026/2027 levy, with some having agreed instalment plans. On the basis that the ECB had ended the financial year with less than two months' reserves, it was noted that the timetable would be adjusted for 2027 to enable levy monies to be paid earlier, with incentives for firms who paid in full on time. The

Board would consider an update on the reserves policy as part of budget planning for 2027/28.

iv. Legal advice had now been secured in relation to data subject access requests, the main themes of which were set out orally. A written update would be provided to Board once the executive had had further time to consider the advice. The ECB's approach would aim to be proportionate and avoid excessive cost while taking account of the practice of other small regulators (**action**).

v. The Board noted the quarterly workplan attached at the annex, which set out the plan for when the main milestones set out in the business plan 2026/27 would be delivered. The Board noted that the date for the fee standards consultation had moved to later in the year. The updated workplan would be presented to Board on approximately a quarterly basis, and future version would set out who in the executive was leading on which areas and include a note from the CEO as to any areas where the Board should be aware of resource constraints (**action**).

vi. The Chair and CEO had recently met the new Chair of CIVEA for a productive meeting. Meetings would be held quarterly going forward. The new Chair explained her priorities, which included preparing the sector for statutory underpinning.

Statutory underpinning

6. The Chief Executive provided an update on developments relating to statutory underpinning. It had been a productive period in public relations terms, with an article in *The Guardian*, and the CEO's appearance on *Good Morning Britain*. The ECB continued to hold regular meetings with MoJ officials and interested parliamentarians on the topic.

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

Item 5: ECB risk and compliance framework

8. The Risk and Compliance Principal presented a paper setting out the progress and intended design of the ECB's risk and compliance frameworks. The paper set out how the approach to oversight work would be structured, the timelines and how oversight would align with the rest of the ECB's work. There were three key elements to the planned approach: (a) evidence gathering; (b) risk assessment and (c) compliance and the paper set out the substance for each of these areas.

9. The following points were raised in discussion:

i) While there were clear benefits to the risk-based approach, there was a risk that the process could be 'gamed' and spot-checks might be needed to reduce this risk. It was agreed that the ability to remain agile, and have mechanisms to override the plan would be important. The focus would remain on high-risk firms however this would be balanced with the inclusion of lower risk firms in review work. All firms would be subject to some element of oversight over time. In its communications, the ECB would explain to industry that the approach was to be risk-based, but with the flexibility to focus attention where it was needed in the view of the ECB.

ii) A question was raised regarding the degree to which technology and automation could be deployed, and the ECB's ability to act as an 'intelligent client' in securing such assistance. Tizo – the provider of the ECB's software for complaints work – had provided an option for automation / AI in complaints, and had also submitted a proposal for oversight however the team was in the process of shaping the key questions ahead of considering a range of possible options in this area.

iii) The need for external viewpoints in the assessment of risk was noted – and the team would approach other regulators to undertake some form of benchmarking, in much the same way as it was doing for the process and efficiency review of complaints (**action**).

10. The Board **agreed** the principle of developing a risk-based model of oversight of the ECB, and **noted** the planned activity for the remainder of the financial year.

Item 6: Creditor influencing strategy

11. The Director of External Affairs presented the paper which set out the proposed strategic action plan for creditor influencing, following discussions at the Board in October 2025 and March 2026. The intention was to deliver the greatest possible impact through a focused and efficient approach, recognising that no dedicated budget had been allocated to the work in the 2026/27 business plan beyond staff time. The following points were raised in discussion:

i. The approach to securing the input of a smaller group of large creditors and then broadening out was welcomed by the Board, with the suggestion of using a local authority in the North of England.

ii. It was agreed that the approach need not be defensive, and that the ECB could be assertive in its tone in relation to the work which is important to the achievement of its mission in terms of ensuring that everyone experiencing enforcement is fairly treated. There were also potential benefits to industry to be had: helping to refine the flow of work to agents / firms would reduce the cost to firms, and help to focus enforcement on the right people.

iii. While it was not for the ECB to lay down the rules for creditors, and each would take its own approach, the common thread was that all enforcement work was undertaken under contract to creditors, and that within those contracts there were requirements relating to vulnerability. In some cases, these elements were likely not being managed adequately, and this was likely to be resulting in poor behaviours in relation to vulnerable people and complaints.

iv. There was potentially interest from MHCLG in relation to encouraging responsible practice by local authorities; a consultation was launched on 1 July and the ECB would be writing to the relevant team.

v. While there was broad support for phase one of the work, it was agreed that phase two needed further reflection and further Board discussion.

12. The Board **agreed** the proposals set out in the paper as Phase 1, and looked forward to further Board discussion on the principles guiding the creditor influencing work.

Item 7: Missing Body Work Video update

13. The Director of Government and Risk presented the paper, which presented an update report on the firms reporting the highest levels of missing Body Worn Video (MBWV) in data return 3 covering the period July to December 2025, and the ECB's plans for tackling the issue. At its June meeting, the Board has requested the detailed reasons behind several accredited firms recording unacceptably high levels of MBWV, and the paper reported back in discussions with the five firms recording the highest levels of MBWV.

14. The following points were raised in discussion:

    i. Most firms had clarified through their investigations that they had overstated the level of relevant MBWV in their initial returns , albeit marginally, although some firms had yet to provide satisfactory answers to the ECB's questions.
    ii. There had been some misunderstanding as to what was required, however it was noted that the ECB's guidance on BWV was clear and the majority of firms had understood what was needed.
    iii. The Board discussed the options for improving the picture, which included publishing a league table on non-compliance, improvement plans for firms who were falling short, regular (monthly) reporting the ECB, and other incentives for minimising MBWV.
    iv. The Board considered what more might be done on the complaint side e.g. in cases of MBWV, to make clear the firm had breached the ECB's standards by not having the BWV available to review.
    v. The Board discussed the differing approaches to holding BWV which firms adopted, with variations covering the length of time footage was held, approaches to storing the footage, and interface with the complaints process.
    vi. The Board agreed there was a need to improve the picture overall, not just in relation to those cases that were the subject of complaints to the ECB. One option was for the Board to write to CIVEA setting out its concerns and what might be done to improve things (**action**) and the executive would consider further the options for improving the picture set out at (ii) above (**action**).
    vii. There was a need for more pace and some sense that there was traction at the most senior levels within firms in terms of the seriousness of the issue.

15. The Board thanked the team for the helpful paper, **noting** the short, medium and long term action that the ECB planned to tackle the issue.

Item 8: Annual report and accounts 2025/26

16. The Director of Corporate Services presented the ECB's year-end accounts.

17. The Board welcomed the expanded narrative on key achievements, and **agreed** that the ECB remained a going concern.

18. The Board **approved** the annual report and accounts subject to the correction of one typographical error. The Chair would sign off the accounts before they would then be filed, by the ECB's accountants, with Companies House (**action**).

Item 9: ECB policy review – Bullying, harassment and dignity at work policy

19. The Director of Corporate Services presented the draft policy, which was **agreed** by the Board without amendment. It was noted that anonymous complaints would not

be vetoed, and would be investigated if they were deemed credible and if they were able to be investigated.

Item 10: AOB

20. The Board thanked the outgoing Head of Complaints for her service to the ECB, and her key role in establishing the complaints function. The Board wished her the best of luck for the future.

21. There were no further items of business.

Item 11: Reflection section

22. The Board reflected on the meeting and agreed that it had been a very productive session with good discussions supported by a high standard of papers.

23. It was agreed that the Board would find further sessions with the sector beneficial, and would invite individual firms to address the Board on a rolling basis (**action**). Board members might also start a programme of visiting firms, perhaps to meet senior management and / or to observe call centre activity for example.

Private session

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

Strategy session

25. The Board held a strategic discussion following the main Board meeting covering plans for measuring and communicating the impact of the ECB's work.

Stakeholder session

26. The Board met the following day with senior representatives from Welsh Government and Welsh Local Government to discuss a range of matters including Plaid Cymru's approach to enforcement.