

ECB Board Meeting – Wednesday 2 September 2026

Venue: Teams

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

In attendance: Holly Perry (minutes), David Parkin, Louise Rubin, Hannah Semple

Observing: Carla Humphreys, Internet Watch Foundation (IWF)

Minutes

Item 1: Welcome, apologies and declarations

1. The Chair welcomed all present, including Carla Humphreys from IWF, who was observing the meeting.
2. No apologies had been received, and there were no new declarations of interest.

Item 2: Minutes of the previous meeting

3. The minutes of the 15 July 2026 Board meeting were **agreed** as an accurate record of the meeting. The Board **agreed** a small number of redactions to the minutes prior to publication.

Item 3: Matters arising

4. The Board **noted** the action tracker and Board forward agendas.
5. In relation to the action log, an update was provided on a Board member's recent visit - alongside executive colleagues - to an enforcement firm as part of the ECB's current process and efficiency review of the complaints function. A number of interesting observations were noted on the resourcing of complaints at the firm, and how this compared with other firms. Generally, the Board expressed an interest in securing data on this for all firms, potentially as part of the data returns work in the future. Opportunities would be made available for other Board members to engage in a similar way with firms directly via shadowing routine visits by the executive.

Item 4: Director's Report

6. The Director for Policy and Oversight presented the report and updated the Board on the following:
 - i. The new complaints team member had made a very good start and was already making a positive contribution to the team.
 - ii. The workshops for the vulnerability guidance were going well, with lots of positive engagement. Publication of the final version of the guidance was on

- track for October. It was clarified that the scale of changes being proposed following engagement with stakeholders was minimal.
- iii. In relation to the process and efficiency review, the deep dive meetings with firms were progressing well, and the team had developed some initial plans for changes to the complaints system. A more detailed update would be presented to Board in October (**action**), to be followed by a workshop with firms in November.
 - iv. The Board welcomed the data on complaints set out in the report, and asked whether it might be possible in future for the data to be presented graphically, and in way that allowed trends over time to be set out (**action**).
 - v. Also on complaints, Board members noted the delays at different points in the process and asked whether there might be a case to 'stop the clock' when further information was requested from firms or complainants. This would be explored as part of the process and efficiency work (**action**).
 - vi. The Board noted the cyber issue and the fast action to contain it, and also noted the work underway on AI. On AI governance, the executive reported that a policy was being developed on the use of AI; and, noting that training for staff was planned for September, Board requested training on AI (**action**).
 - vii. On the proposals for Board evaluation, the plan for an internal questionnaire for 2026 similar to the one used for 2025 was agreed, and the proposed reciprocal arrangement with the IWF for 2027 was also agreed, on the basis that the connection between the two organisations was made clear (i.e. that both organisations were chaired by Catherine Brown), and as long as there was a clear framework agreed for the review (**action**).
 - viii. The Chair clarified that she would be contacting Board members imminently regarding arrangements for Board member appraisals for 2026 (**actioned**).
 - ix. Following the Government's announcement on statutory powers for the ECB on 29 August, the Board agreed to set aside time at their next meeting to think about how the ECB should position itself over the coming months, including how to focus our public affairs work (**action**).

Statutory powers update

- 7. The Chief Executive provided an oral update following the announcement the previous week on statutory powers for the ECB, which had followed an intense period of work and public affairs activity, and engagement with the team at MoJ. The following points were set out in the CEO's introduction:
 - i. In terms of what would change, there would be an insertion into the Certification of Enforcement Agents Regulations 2014, requiring private sector enforcement agents undertaking TCOG work to either be employed by or instructed by ECB-accredited firms, or to be accredited directly by the ECB should they do TCOG work directly for creditors. The ECB thought there may be a handful of these, for whom the ECB may need to offer a new form of 'sole trader' accreditation.
 - ii. The change was significant, as it would make ECB accreditation mandatory for all TCOG work by private firms. This would mean ECB accreditation and therefore the levy being mandatory, thereby underpinning of the ECB being secured.
 - iii. The ECB estimated that there may be around 10 to 20 small providers who would need to come forward for 'sole trader' accreditation in the light of the measure, and the ECB would discuss with MoJ the best way to reach them early via informal engagement.

- iv. There would also be a Memorandum of Understanding (MoU) to underpin the relationship between the ECB and the MoJ.
 - v. There was currently no commitment from MoJ on timing of the introduction of the Interim Measure, but it was expected by the end of the year or early in the new year, with the new arrangements coming into force probably in April 2027.
8. The following points were raised in discussion:
- i. The Board congratulated the whole team involved – this marked a significant step forward for the ECB and was a tribute to the sophistication of the policy and communications teams' work.
 - ii. Questions were raised about what the changes would mean for in-house local authority teams who were not currently accredited – for people experiencing enforcement, it was important that there were consistent standards of protection that applied regardless of geographic location or employer. This would be a key area for further discussion with MoJ officials.
 - iii. The Board also asked about powers to take rogue agents 'off the road'. The ECB had initiated an EAC2 process for the removal of an agent over the summer, and it was taking a long time. The proposed measure would not in itself address this. The ECB would need to do some work to look in to measures that it could pursue that had the effect of stopping rogue agents from working without taking over certification from the courts. This would be a further area for discussion with MoJ.
 - iv. With regard to the MoU, early work was underway with the emphasis on minimising MoJ requirements on the ECB, so that it could continue to work in an agile way.
 - v. The Board considered what the developments meant for the ECB's visibility, and the sort of organisation the ECB wanted to be in the future. On balance the Board considered that the approach the ECB had taken to date – a clear focus on fair treatment of people experiencing enforcement and the public good that appropriate enforcement delivers – would be unaffected by statutory underpinning. The ECB had always been robust when required to deliver its mission, but also committed to working in partnership with the enforcement sector and debt advice and this should remain the approach going forward.
9. The Board **noted** the Director's report and the CEO's oral update on statutory powers. There would be a further session on statutory powers at the October Board meeting, covering next steps, implications and what next for the ECB (**action**).

Item 5: Organisational communications and engagement plan

10. The Director of External Affairs presented the paper, which invited Board to consider an organisational comms and engagement plan capturing the communications objectives and key outputs for the remainder of 2026/27, and for 2027/28. The paper had been prepared ahead of the Government's announcement on statutory powers, and therefore the context had shifted somewhat. Nevertheless, there was the opportunity for Board to take stock of the ECB's communications outputs to date, to check on current objectives and purpose, to consider whether the ECB was reaching the right audiences and whether it was demonstrating its impact sufficiently. The following points were raised in discussion:

- i. The Board welcomed the paper, and given the current point of transition with the statutory powers announcement, there was an opportunity to ask what sort of organisation the ECB wanted to be for its next phase, and the communication strategy would flow from this.
 - ii. In relation to how the ECB might increase engagement with people experiencing enforcement, the Board agreed that the ECB was not generally best placed to seek to communicate direct with this audience given its limited resources. There were well-established bodies already operating in this space, who were better equipped to reach people experiencing enforcement. The ECB would want to act in partnership, ensuring that the information people received from debt advice organisations and the industry was informed by the ECB's expertise. The ECB had a unique contribution to make in relation to the quality and comprehensiveness of its insights and expertise, and its ability to provide definitive advice and guidance.
 - iii. Further work was felt to be necessary on the ECB's website to ensure that it supported that priority of making high quality information and advice available to intermediaries and also provided an adequate fall back resource for individuals experiencing enforcement who "fell between the gaps" of debt advice. It was agreed that some investment in the website in 2027/28 would be required to achieve this.
11. The Board **noted** the paper and **approved** the proposed communications objectives and outputs for 2026/27 and 2027/28.

Item 6: Governance policies for review and approval (a) Policy on conflicts of interest (b) Equality, Diversity and Inclusion policy, and (c) minor change to Expenses policy

12. The Director of Corporate Services presented two policies for the Board's review. The policy on Conflicts of Interest had been in place for one year and appeared to be operating well. While no substantive changes were proposed, some minor adjustments were agreed.
13. The Equality, Diversity and Inclusion policy was agreed without amendment, and a minor change to the expenses policy was also agreed, to enable colleagues travelling late on ECB business who were not staying overnight at ECB's expense to be able to claim the cost of an evening meal.
14. The Board **approved** the policies presented for review.

Item 8: AOB

15. Board members would be contacted by the Chair regarding arrangements for appraisals, to be held in October. The Senior Independent Director would undertake the Chair's appraisal.
16. The Chair extended her thanks on behalf of the full Board and executive to David Parkin who would be leaving on 30 September 2026. David's knowledge, wisdom and distinctive perspective would be very much missed and the Board wished David well for the future.

17. The Chair thanked everyone for their contributions and reflections on the meeting.

Private session

18. The Board met for a private session.