



## COVID-19 Guidance on enforcement visits, 13 December 2021

The Government has announced new measures, known as Plan B, effective from today. There is no revised instruction for enforcement agents and we recommend they continue to follow the Ministry of Justice [guidance](#) on how to work safely during the pandemic, including social distancing and dynamic risk assessment.

CIVEA members should be alert to local restrictions that may be implemented in response to Omicron or other variants of the coronavirus. Where there are high volumes of infection in a concentrated area, enforcement visits should be conducted in line with central and local government policy. The safety of enforcement agents and the public should be the primary consideration.

### **Enforcement Agents**

Enforcement agents operating in the field face higher risks than other staff and CIVEA members continue to have a responsibility for the protection of their agents and the public.

- Where possible, visits by Enforcement Agents should be contactless in line with published COVID safe working practices
- Enforcement agents should establish from a distance whether there is a requirement for them to enter the property.
- Enforcement Agents should try to keep a safe distance (2m, or 1m with appropriate risk mitigation where 2m is not viable) and always explain the reason for their visit and the precautions they are taking
- Where a householder discloses that they have tested positive for COVID-19 within the last 28 days, all enforcement action should be suspended for 14 days
- Enforcement Agents are entitled to request proof, such as a screen shot from the NHS tracking app.
- In agreement with clients, forbearance should be offered for those infected or affected by measures taken to contact the virus (such as extended voluntary breathing space, payment breaks or temporary reduced payment plan)
- Enforcement Agents should continue to use personal protection equipment and receive appropriate training on its use.



### **Wearing of face masks**

In line with Plan B measures, the CIVEA advice remains that face masks should be worn to protect the public where possible when entering a residential property. However, where communication is proving to be difficult the mask may be removed, provided the agent maintains a safe distance from the resident or other persons.

### **Handling cash**

Regarding cash payments, whilst online and card payments are the safest option and most people can pay this way, CIVEA advice is that cash payment can be made safely where necessary and agents should wash their hands and/or sanitise accordingly after handling cash. As always, this advice should accord with individual company procedures.

### **Immobilising vehicles**

Enforcement Agents should proceed with extreme caution and be aware of the increased chance of infection when clamping vehicles. Enforcement Agents should carefully consider the need to clamp a vehicle. In particular, if the vehicle is proven to be used by a critical worker to travel to work or required for urgent transport if someone is seriously ill.

The same procedure when entering and leaving their own vehicle should be applied with other vehicles.

### **Vulnerable customers**

It is clear that many people will suffer negative economic impact even if they don't become ill themselves.

Some people may have suffered an income shock as a result of measures enforced by government to contain the virus (e.g. unable to work due to caring needs for elderly relatives or children in the event of school closures, unable to work due to travel restrictions, social distancing requirements or office closures).

Some people who become ill or are advised to self-isolate will not be entitled to sick pay or will only be entitled to statutory sick pay. It will be very difficult for people to provide evidence of illness as the advice is to not visit our GP.

CIVEA members are advised to treat each case on its merits, but to adopt a flexible and sympathetic approach toward anyone claiming to have been impacted by COVID-19. This is likely to include allowing those already on payment arrangements to reduce or defer some of their instalments, on a temporary basis.



- Vulnerable customers should be referred to the welfare officer or vulnerability care team
- Staff should ask the debtor if there will be any financial impact to them during this period and record the case accordingly (e.g. Self-employed, SSP, already on benefits so no change)
- If the situation has led to an income shock, debtors should be afforded a payment break and advised that normal payments will resume upon their return to normal earnings
- All enforcement action should be suspended for anyone identified as particularly vulnerable to COVID-19 and who are required to isolate
- Where appropriate vulnerable people or those who have been severely impacted financially by the pandemic, e.g. loss of job, Statutory Sick Pay, will be referred to debt advice agencies for additional support
- In these circumstances, the case will be placed on hold to be monitored, with contact by welfare staff, as appropriate, prior to proceeding. The fees incurred will remain in place
- Vulnerable people will be referred to their creditor for additional support, where appropriate.