



### **Enforcement agents' experience of Post-lockdown visits**

CIVEA has compiled a report which considers the success and challenges of returning to enforcement visits one month after restrictions were lifted. Based on a survey of 21 enforcement firms and their field agents, the report shows generally consistent and positive experiences across the industry regardless of company size or location.

CIVEA members responding: Rundles, B&S Bailiff Services, GLBC, CDER Group, Whyte & Co, Jacobs, Marston Holdings, Chandlers, Bristow & Sutor, Penham, Confero, Newlyn, Goodwillie & Corcoran, Excel, AJE Enforcement, Reventus, Dukes, Sheriff & Penny, JTR Collections, Equita

In the interest of authenticity and transparency, comments are unedited.

#### **What are EAs reporting about the practicalities of contactless visits and protective measures?**

- **Nothing to say that's negative, not much feels like it's changed, obviously keeping a further distance than normal as well but people seem grateful that some normality is resuming I guess. Oddly been invited in houses a few times (mostly when people are searching for proof of tenancy as a 'gone away') & you have to remind them we're still in the midst of a global pandemic, so in a way we're reminding people of the situation which can't be a bad thing. Had a couple of awkward elbow bumps with people that wanted to shake hands, & getting through lots more hand sanitizer, but that's about it. (Whyte & Co)**
- **Industry and internal preparations meant that application of MoJ guidance was straightforward, and we were able to recommence as planned on 24 August. Enforcement agents also feel reassured by these measures. Enforcement agents have expressed concern that our removal of the sanction of entry to premises to potentially take control of goods could have a detrimental effect on recoveries – we are monitoring this. Of the 280,000 letters we have sent, debt advice organisations have been in contact with us in relation to 72 cases. Only one of these cases involved a complaint. (Marston)**
- **We have found it not too hard to keep distancing and follow the guidelines, and find the general public are in support of how we are conducting visits. (Chandlers)**
- **Our EAs have even reported being invited into properties, which of course they declined. Feedback from the 11,000 visits carried out by our EAs has been largely positive with a high proportion of them relieved to find the post Covid-19 world on the doorstep nothing like as they had imagined, and so much more like BAU. (Bristow & Sutor)**
- **No real problems, agents have adapted well to new procedures.**

- I've been out on call everyday and had no issues whatsoever. My phone has been very busy and people in my area have been very keen to pay. My agents have reported pretty much the same thing, the fact that we are applying the correct protocols has made our job easier.
- Not much. All seems to be working well. (Goodwillie & Corcoran)
- I have had a few customers that were not happy that we are visiting during a pandemic but none of those have been personally affected, most feel they have been lucky not to have been visited in 5 months. The PPE kit issued comes in handy with the gloves, wipes etc. No issues or difficulties I can see at the moment. (Newlyn)
- Since their return to work, our enforcement agents have reported significant confidence in the PPE provided and measures taken to protect all concerned and are adhering to the temporary policies as evidenced by random sampling of body cam footage. The feedback via supervisors is that debtors have, generally, been cooperative and appear to appreciate the way the enforcement agents have handled themselves and their safe approach in attending. (Excel)
- Our field force have advised that it has been a very smooth start in the recommencement of contactless enforcement visits. The public appear to appreciate the steps CIVEA members have taken with all of our EA's wearing the required PPE and the EA's coordinating social distancing throughout the visits.
- I feel that all the measures that are in place are aiding us all to work safely protecting ourselves and the members of the public we come into contact with. I feel confident and safe to go to work in the knowledge I am protected and have all the measures in place to continue. (Newlyn)
- Finding people are generally keeping distance. EA advised has been fine - takes a bit longer due to Health Check Phone Call but same level of contact. Debtors have been pretty understanding, most are keeping their distance but some debtors are commenting how 'disgusting' it is to be visiting during a pandemic. A lot more debtors are refusing to pay as they know they if they have symptoms an agent is not to call so makes it harder to collect and visit. Had good response from debtors on the door, happy to see us wearing correct PPE. (Jacobs)
- On a daily basis, EA's are reporting the number of debtors they come in contact with face-to-face. So far, we had no report from EA's about any incidents breaching the safety guidelines neither by the debtor or the EA. Our records show that 99% of the response received to contactless visits is via telephone [as opposed to letter].
- Our agents have advised that the new PPE equipment and sanitising processes upon entering and leaving their vehicles is time consuming and slightly frustrating, but it is manageable and isn't impacting daily visits too much. Our company policy is that agents must wear a visor and a face mask and there has been some feedback that wearing visors in the rain is not very good as it collects the rain and impairs their vision, some have also blown off in harsh winds. However, wearing masks and all other PPE is fine and presents no issues.

- So far, since returning, I have not encountered any problems with regards to Covid 19. The people I have met at the door have all been comfortable with the PPE that I have used and all debtors have responded well to the approach I have adopted. I fully understand the situation many people find themselves in at the moment and am working hard with debtors to find the best solutions to their individual cases. I have already had many people thanking me for the way I have spoken to them etc. I believe that we can continue visits with the new procedures in place, keeping ourselves and others safe. (Newlyn)
- So far, where I have made contact at the property, people have been good to deal with and have respected social distancing. Visits are taking a bit longer as we are following guidance therefore restricting amount of visits per day. Other than that, collection has gone well. (Newlyn)
- Our staff have not reported any issues in relation to the measures or PPE provided, maintaining 2m has not been a problem. (Penham)
- There have been no major problems reported in terms of the EA being able to do their job. Communication with the customer is obviously more difficult when keeping a healthy distance, and wearing face coverings can also be an issue when communication. In terms of practicalities, many customers invite the EA in to their property either because they don't want to discuss private matters in full view of their neighbours, or simply because they are being polite and want to sort out the matter. This is proving challenging when an EA explains they can't do it. Many customers offer cash payments also which is potentially their only means of payment. Many do not have access to bank accounts or the internet, so refusing cash payments can also be deemed to be inflexible on our behalf. (CDER Group)
- Our enforcement agents are telephoning each customer before they visit (if we have a number) to make a Health Check call to see if the debtor or other residents are isolating, have the virus or are shielding as recommended in the Public Health Guidance. We have only had 190 cases out of 21256 cases where customers have responded that they have responded positively to the Health Check phone call. (Jacobs)
- There is no question that the new procedures make visits more challenging, with more time being spent before each visit making sure all PPE is on and protocol followed, resulting in less visits being completed throughout the day. I do understand this is necessary to ensure we are all safe.

What has been the response from debtors to the new visit procedure?

- Our EA's have in fact reported a significant increase in the number of invitations into properties, which of course they politely decline and advise of the current procedure for visits. We believe this to be directly related to so many individuals being lonely during the emergency period. (Rundles)
- Debtors seems to feel that the Enforcement Agents are going above and beyond in keeping them safe during this difficult time. (Chandlers)
- Very little negative reaction. We've had one instance where a debtor threatened to spit at an agent to pass COVID-19 and aggressively pursued the agent to his van. The police were informed and the debtor was subsequently given appropriate words of advice. It is evident that a small number of debtors are using COVID-19 to try to frustrate recovery e.g. numerous repeated alleged periods of self-isolation since March.
- Some were grateful for the delay in visits taking place. (Goodwillie & Corcoran)
- No properties were entered. No goods were removed. In 3 cases occupants invited the EAs inside but they declined. 2 debtors were deceased. Debtors appear to appreciate the way the EAs have handled themselves and their approach in general. I have had zero complaints.
- Generally positive with no real complaints that have been covid related. (Whyte & Co)
- Enforcement agents report that customers feel protected by enhanced hygiene measures and social distancing. (Marston)
- On the PPE, I had one lady (who had some anxiety issues) comment that the appearance looked a bit scary, but after my calm explanation she understood the reasons for wearing the gloves and mask. Sometimes I do get feedback to speak up a bit more as the mask does dampen the volume of my voice in some instances, but this is not an issue. (Newlyn)
- Random sampling of footage has shown that visits are progressing well, with no issues identified in terms of customer or enforcement agent experience.
- Enforcement agents have reported a limited number of customers as having cited Covid-19 as a reason not to engage. (Marston)
- We have had zero complaints about EA activity to date. We have recorded no H&S issues from EA visits.
- Over 500 visits since the 24.08.2020 and only 5 people have reported that they are self isolating/showing symptoms.
- We have not had a single complaint regarding the new visit procedures. There seems to be a general public acceptance of the new approach on the doorstep i.e delivery drivers as home deliveries increase . (Reventus)
- The response has been very positive, the majority of debtors contacting us have been very co-operative and we have been able to resolve the matter. In cases where a debtor is unable to make a full payment, we offer an arrangement based on individual circumstances. Sadly, some debtors are still have been reluctant to pay but no more than usual.

- Debtors have been really positive and grateful for our commitment to wearing PPE and support with payment arrangements. The publicity ahead of enforcement probably made people nervous about having to manage their debt, and resolving it face to face. However, coupling the new visit procedure with an empathetic and patient response, we've found debtors to be cooperative, positive and grateful for our support. Agents have said that some debtors do initially take the stance that they can't pay due to covid, but when taking the time to ask why and when they have been impacted and discussing payment options, they become more open minded and are willing to set arrangements.
- Feedback from one of our agents includes: "Debtors have been surprisingly amicable and I have found as long as I am willing to listen they are happy to engage and find a way forward. Getting money on the door is proving difficult at the moment compared to pre-Covid... generally people are needing a few days to raise some funds and then will set arrangements."
- Doing very well since lockdown, positive and getting more payments than usual. Debtors understand why masks etc are worn. A lot appreciate it. (Jacobs)
- There has been a good response from debtors, who have commented and been encouraged by the PPE measures that are in place, reflecting in their willingness to cooperate and manage their debt with our agents. (Dukes)
- On the whole our staff are reporting people seem generally calmer and only about 30% of debtors even mention the virus and most of these are saying they are better off as a result of the crisis either because of the furlough scheme or additional work that has been created allowing them to settle their debts. (Penham)
- I have not received any complaints at all and there have only been two reported cases of negative reactions to the visits. In both cases the enforcement agents resolved matters by entering the debtor into an arrangement. In line with the current CIVEA policy, no domestic properties were entered and, because of the considerable cooperation of most debtors, no goods have been removed although, in some instances, vehicles have been subject to controlled goods agreements. (Excel)
- Very positive. Our expectations were that COVID would be a major factor in our dealings with customers. This has proved not to be the case. Many customers have even cited the fact they have more available funds to deal with their debts as their outgoings has reduced during lockdown.

What has been the impact on debt collection rates?

- Initial collection rates are very good, although we are working through a lot of first calls at the moment. Debtor absconded rates have increased as cases have been stagnant. (Bristow & Sutor)
- Council Tax and NNDR we're at 80% of our collection for last year, parking we're at 86% of collection for last year. Collection rates are increasing daily. Surprisingly full payments are up on last year, several debtors have commented that they've better off on furlough and now have surplus cash.
- Collections are c. one third lower post-resumption due to sensitive approach and the restrictions currently in place. (Marston)
- Our EAs have smoothly transitioned to their new environment and PPE, and the effect of not entering homes has had minimal impact on collection rates or engagement. In fact, we are pleased to report an increase in debtor engagement on our pre-COVID caseload. (Reventus)
- Collections (pre restart of visits) are running at around 30% of their pre-COVID levels. This reflects the fact that many of our charge-paying customers were already on arrangements. We believe that collections will remain at a significantly depressed level for the next few months until new Liability Orders are generated. (B & S Bailiff Services)
- Starting to rise, albeit slowly. (Goodwillie & Corcoran)
- As we suspected, whilst there are some individuals that have been impacted by COVID-19, there is a large percentage of our customer base where the individual is better off financially than prior to the outbreak. These individuals appear to be trying to settle the debt in full, or by a higher instalment amount than previously agreed. (Rundles)
- Since recommencement we have only 20% of our clients allowing us to send Enforcement Agents or even letters which is frustrating as we are still collecting a high percentage of the debts on clients that are allowing us to work. There does seem to be a surplus income and people are paying their debts in full. (Chandlers)
- Since the resumption of enforcement visits, the collection rate has slightly increased, however it is still too early to know if this will continue. Additionally, not all our clients have agreed to the resumption of enforcement or even letters at this stage.
- The impact on collection rates has been significant, all debt streams collections have reduced by up to 80% during the lockdown and enforcement ban. Since sending communications advising that visits are now recommencing, we are noticing a steady increase in engagement at both compliance and enforcement stages, however with offering longer term arrangements, our collection rates are still lower than usual.
- There appears to be no adverse effect on collection rates however we are seeing some long standing debts being cleared in full where people are better off. (Penham)

- While it is hard to make comparisons, in absolute terms our collection rates have dropped relative to the pre-COVID period. Collection rates by referral month will not be relative to past behaviour because any case referred since April would have had up to a 4 month compliance stage. If we look at collection rates on cases which have had a visit prior to lock down there has been a 70% drop. The amount of debt that we have recovered since recommencement is misleading as we have a very large backlog of cases waiting to be worked. This won't be the case over the coming months, and we will do incredibly well to hit the pre-lockdown collection rates going forward. (CDER)

#### How well have people responded to the 30 day notice letters?

- The re-engagement letters have been generally well received, with some customers thanking us for our proactive contact aimed at preventing an unnecessary visit. Of 280,000 letters issued since mid-July (of which some will have resulted in visits), 0.009% have generated complaints. Customers have responded positively to our extension of payment arrangement terms (offered in conjunction with client agreement). Covid-19 has not been cited by customers to the extent we had expected so far, but we will continue to monitor this to ensure we are resourcing our Welfare and Financial Difficulties teams correctly. (Marston)
- Response to the reconnection letter was fairly low, although did increase just before visits started. Contact rates have increased by 15%. The EAs are not encountering significant COVID related issues, only on ~1% of calls. (Bristow & Sutor)
- Response to re-engagement letters has varied but was generally lower than expected (overall average of 7.5% on council tax cases and 3.5% on parking cases). Many clients considered the letter as too soft or 'woolly'. Shorter but still balanced follow up letters, emails, text have received a greater response.
- There was a high level of concern from our council clients about the response to the 30 day letters. They wanted to be sure the responses were measured and not overly problematic before the councillors involved were willing to resume physical collections.
- Only a minority of charge-paying customers responded to our letters - mostly by ringing our office. We were able to handle these cases remotely and have restarted old arrangements or put in place new ones. Where appropriate, we have flagged vulnerability arising from COVID on our internal system and given our council clients access to this information. The responses were sufficiently benign that our clients have felt able to authorise physical collections.
- Hardly any responses to the 30 day letter. (Goodwillie & Corcoran)

- We believe this period of notice has been appreciated by some, however the response levels to the letter were fairly low. This isn't surprising considering the number of notices sent on some cases prior to this letter being sent.
- Prior to resuming enforcement visits we sent every debtor an arrangement reminder letter or a general reconnection letter giving them a least 30 days' notice before attending. Some took advantage of this and paid in full or entered into sustainable arrangements to avoid the additional costs or advised us of changed circumstances so we could re-assess their existing arrangement; but the response was not as high as we had anticipated. In the majority of cases, an attendance was necessary. (Excel)
- We had a very low response to the 30 day letters sent out.
- No negative responses but not a great positive response in terms of engagement - we received between 3-5% in terms of arrangements set. It is difficult to monitor general calls with no result. This is not to be unexpected as the letters went to non arrangements (people who are not seeking to engage) and failed arrangements (people who have stopped paying). (Whyte & Co)
- 30 day notice didn't generate as much response as I had envisaged but we are also sending this through webforms which is proving more successful.
- We were disappointed with the response to the thousands of 30-day reconnection letter we sent. However we have throughout the lockdown period kept contact with customers with a light touch approach, querying if they've been impacted by COVID-19 and how we could support them. Unfortunately, as we know, it takes a visit for resident engagement on the delinquent work profiles we hold. (Reventus)
- We have had reasonable engagement levels to the 30 day notice letters, with people happy to set an arrangement. There has been a definite increase in response compared to our data gathering letters prior to enforcement ban being lifted. This has proven that people just didn't contact because they didn't have to.
- The majority of people who responded to 30-day letters had previously made contact or had a payment plan prior to the pandemic. To sum up the response has been very muted to both 30-day notice letters and enforcement visits.
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- We have had little feedback one way or the other whilst out in the field, but what was apparent is once the letters started to land, our inbound call rate increased as did our arrangement levels. Our interpretation of this was that the letters did stimulate a positive response and negated the need for EA visits where contact was made.





- **The re-engagement letters which were distributed were designed as a prompt to contact us or deal with their situation. We have so far distributed 78,800 letters, yet only 1,006 customers have responded to the campaign. This is a contact rate of 1.3%, significantly lower than our business average of 4.2%. This seems to demonstrate that customers who are not going to react to letters, phone calls or emails will continue not to do so and require a visit to the residence to engage in the process. (CDER)**