

ENFORCEMENT^{NEWS}

The quarterly magazine from CIVEA, the Civil Enforcement Association

SPRING 2022

- We enter a new era for enforcement, writes Carole Kenney
- Reflection & Collection: Russell Hamblin-Boone introduces the 2022 CIVEA conference



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Excellence in identifying and assisting vulnerable customers



June 2021



October 2021



November 2021

As a client of CDER group, you can be assured that your customers are treated in a fair and compassionate manner. Winning these prestigious awards is testament to the hard work and resource that my colleagues in all departments put into ensuring that we operate in accordance with our "Fairness Charter".

**Andy Cummins, IRRV Tech
Director, Local Government Revenues**



Exciting projects ahead for Spring

Welcome to the Spring edition of Enforcement News. I hope that you find our magazine informative and insightful.

There is a challenge to writing the Spring edition in January. We have a number of projects in the pipeline that are due to be announced in the Spring but may not have completed before Enforcement News is published. For example, the new oversight body, to be known as the Enforcement Conduct Board, should be close to launch, plans for the conference and awards should be well advanced and we should have published a seminal report on the state of the industry since 2014. Having referred to these activities I can't give away too much detail.

I can predict that the selection process for the person to chair the new industry oversight body will be complete and hopefully an appointment made. We have had a tremendous response to the advertisement. From senior civil servants, politicians and industry veterans there is a clear message of intense interest in this new organisation. Those who expressed an interest in the chairmanship have stated a strong and genuine commitment to helping our sector maintain high standards of conduct. There is a recognition of the demands on the enforcement industry to meet their obligations to maximise debt recovery, while assisting local authorities to support vulnerable households.

There is a huge amount of work to be done until the new oversight body is fully functional, but we have made a great deal of progress in a short time. From the positive response I have received from a wide range of industry professionals we have been able to deliver what the industry has been discussing for many years. The new organisation will not only support industry ambitions for consistent and high quality services, but it will be able to give an independent view of enforcement operations.

It is timely, therefore, that this Spring we will be celebrating the best of our industry at the inaugural enforcement awards. I anticipate that there will be some excellent entries showcasing the best practices of enforcement agents across England and Wales. The categories have been designed to encourage entries from the smallest independent firms to the group of companies. The judges will take into account the status and resources of each entrant, so that each firm will be judged on a fair and equal basis. I am grateful to all the judges who give up their time to review the entries and select the winners.

The awards will be presented at a gala dinner, which is preceded by our conference. The theme this year is reflection and collection. It was chosen to allow us to take stock of the advances made in enforcement since the 2014 reforms and to look ahead to what is required of enforcement agents in a post-pandemic economy.

We have an excellent line-up of expert speakers and have ensured that there is a good representation from local government. With the enforcement sector working so closely with councils, many of our delegates will be from local authorities. As we face scrutiny of public debt management, it is important that we present an accurate experience of the enforcement industry and its value to local communities. This is just one of the topics that will be explored by the conference speakers. There are more details about the programme

"It is timely, therefore, that this Spring we will be celebrating the best of our industry at the inaugural enforcement awards."

and topics of debate inside the magazine.

The widely reported cost of living crisis that we are told to expect is likely to put in focus the challenge of recovering overdue payments for taxes and fines. The media coverage has echoes of the 'cost of living crisis' in 2012/13 that the coalition government faced following the financial crash. At that time, the pressure was on the consumer credit sector to exercise forbearance on people in debt. The implications of that policy have impacted the market ever since and treating customers fairly is embedded in financial services. In the forthcoming crisis, the debt advice sector has already identified priority debts to government bodies and utilities to be the main cause of problem debt.

Concerns about Council Tax debt have been expressed by MPs on the Levelling-Up, Housing and Communities select committee. An inquiry is on-going into council tax collection practices and CIVEA and its members have submitted detailed evidence to inform and educate the committee members about modern enforcement practices.

As part of on-going efforts to drive up standards and professionalise our industry, enforcement agents have access to a range of training programmes. In this edition of Enforcement News, we hear from the three CIVEA-supported suppliers of examinations for enforcement agents.

Please enjoy this edition of Enforcement News and feel free to let me have any feedback or suggestions for topics that you would like to read about.



Russell Hamblin-Boone
CEO, CIVEA



Citizens Advice call for reforms to benefit deductions

A new report from Citizens Advice called 'Taking too much?' looks at the experience of benefit deductions to pay for energy and other debts. It comes off the back of concerns that in the current circumstances following the COVID-19 pandemic, many more households may fall behind on their energy bills.

New research published on money and mental health in a time of crisis

Research by the Money and Mental Health Institute, The State We're In, reveals that during the COVID-19 crisis, people with mental health problems faced a much higher risk of financial hardship compared to the wider population. Banks, energy companies and other essential services providers should proactively identify customers who may be struggling and improve the support they offer. This could include developing better processes for referring people to debt advice, offering realistic repayment plans, freezing interest and charges, and reviewing decisions on debt collection for customers with mental health problems.

Registry Trust warns of bailiff scam

The Registry Trust has issued a warning following reports of people receiving phone calls from fraudulent bailiffs telling them they have a pending county court judgment (CCJ) which needs to be paid immediately. The scam involves a caller claiming to be a bailiff who can stop a 'pending' CCJ from being added to the Register if the debtor 'pays up' there and then. The convincing caller may suggest that it is a historical debt that the supposed defendant is unaware of (e.g. an uncanceled subscription) which has already been taken to court and found in the claimant's favour due to lack of response.

James Cartlidge (Parliamentary Under-Secretary of State for Justice)

Concern has been raised by some Parliamentarians and interested parties about whether the law allows a sum equivalent to VAT costs to be recovered from judgment debtors in cases when it would represent a cost to the creditor and whether it is fair to do so. Whilst we take the view that the Taking Control of Goods legislation when considered together with the common law position permits the recovery of VAT costs from debtors in this way, we have accepted, however, that this is an area where it would be beneficial to set out the position in Regulations to put the matter beyond doubt. This Instrument, therefore, amends the Fees Regulations to clarify that a cost equivalent to the VAT incurred on enforcement agent fees and disbursements may be recovered from a judgment debtor if the judgment creditor is not VAT registered.

For more news go to the CIVEA website <https://www.civea.co.uk/news-and-media>

Lord Best (Crossbench):

Perhaps I could take this opportunity, on the subject of bailiffs, to note that there is considerable political and practitioner interest in bailiff reform. Will the Minister reaffirm the Government's support for the enforcement conduct authority, as organised by the Centre for Social Justice in partnership with both the bailiff sector and the debt advice sector?

Lord Wolfson of Tredegar, Parliamentary Under-Secretary of State for Justice:

"Before I sit down, I should pick up an important point made by the noble Lord, Lord Best, about the enforcement conduct authority. We are strongly supportive of the work that is being done by the Centre for Social Justice, in partnership with the enforcement and debt advice sectors, to set up an enforcement conduct authority to provide independent oversight of firms and to consider complaints. We believe that the proposed authority will make a real difference by raising standards in the industry to protect vulnerable debtors while improving the effectiveness of enforcement. We remain committed to reviewing the new body within two years of its operation and then deciding whether it is necessary to put it on a statutory footing."

Sian Berry (GLA Green Party):

Noting that many councils have seen an increase in Council Tax arrears during the pandemic, could you tell me the total number of London households in arrears and the total amount of GLA council tax precept owed in arrears, broken down by: a) the financial year for which precept is outstanding, and b) London borough?

Sadiq Khan, Mayor of London:

"There is no publicly available data on the total number of households in Council Tax arrears or the total amount of Council Tax arrears arising during the pandemic. Any individual data concerning debts and arrears, held by local authorities, is necessarily subject to strict privacy laws. The government's data publications relating to Council Tax can be found here: <https://www.gov.uk/government/collections/council-tax-statistics> Many local authorities chose to take a sensitive approach to Council Tax enforcement activity during the pandemic, for example by halting enforcement agents visiting households in arrears and/or not issuing final demands, and this is likely to have resulted in reduced Council Tax collection rates over this time."

Yvonne Fovargue:

To ask the Secretary of State for Justice, what steps the Government has taken to support the establishment of the Enforcement Conduct Authority proposed by Centre for Social Justice; and when his Department plans to publish the results of its 2018 call for evidence on enforcement agent reforms.

James Cartlidge:

"The Ministry of Justice strongly supports the creation of the independent oversight body for enforcement agents and firms that has been proposed by the Centre for Social Justice (CSJ). Officials have met regularly with the CSJ and the working group that is establishing the body to support its development. We will undertake a review of the body within two years of its operation to see if any legislative changes are necessary to place it on a statutory footing."

This edition marks my final editorial as President of CIVEA and whilst there is still much to do during my remaining few months in the role, it is difficult not to reflect on what has been a rollercoaster of a journey.

I took this position just a few weeks into the first lockdown and first-ever restriction on our activity as enforcement agents. I have been immensely humbled and grateful to my fellow members for their unparalleled support and commitment to help those impacted by coronavirus, with extended flexibility and forbearance and for collectively re-starting enforcement in a safe, responsible and fair manner.

The measures enforcement firms put in place during lockdown were not temporary but are now an integral part of business as usual operations. There has been significant investment in welfare support and I am witnessing more and more members form strong partnerships with the third sector to provide a better customer journey for those subject to enforcement. Debt advisers have indicated that the extended levels of forbearance offered by creditors are one explanation for the lower than anticipated levels of breathing space registrations which is incredibly positive.

"It is hard not to feel a sense of pride by the growth we have achieved and the determination of our members to strive for the highest possible standards."

In the last year we have seen some of our members win awards for their approach to collections, social inclusion, partnerships, use of technology and vulnerability support. Examples within the enforcement sector being held as exemplary across a range of industries such as financial services and local government. It is certainly a proud time for our industry and I am excited to attend our own inaugural awards ceremony in April, as we shine a light on more examples of outstanding efforts within our sector to raise standards and lead best practice in public debt collection.

When I hand over the president baton in May there will be a new independent oversight body for the industry. Not a regulator imposed on a kicking and screaming archaic industry but independent oversight which has been called for and welcomed by a progressive, pro-active and united industry and established through collaboration with the debt advice sector and the Centre for Social Justice and with support from the government.

It is hard not to feel a sense of pride by the growth we have achieved and the determination of our members to strive for the highest possible standards. This has been evident as firms continue to come forward for code compliance audits through CIVEA, another six members have signed up already this year and we will continue to take bookings. Please contact Fran at admin@civea.co.uk if you have not already done so. This is an excellent opportunity to prepare your business for greater oversight and those members who have completed their audit have commented on how insightful the process was.

As we make positive strides to raise standards and support for vulnerable individuals we often overlook the vulnerable position

The publication of the response to our call for evidence about the enforcement agent reforms, which closed in February 2019, has been delayed as a result of the department's response to the pandemic. That allowed us to refocus our priorities, which resulted, for example, in MoJ and DLUHC introducing an extended ban on enforcing evictions to prevent people being made homeless during Covid, so protecting public health and easing the burden on the NHS and local authorities."

some of our agents are placed in when carrying out their duties. In my day job at CDER Group I regularly review body worn camera footage and I have been horrified to witness an increasing number of unprovoked attacks on our enforcement agents, often with weapons and resulting in the hospitalisation of the agent. I sincerely hope that through the establishment of an independent oversight body we will start to see more respect for the role of an enforcement agent and greater understanding of the vital role they play in the collection of taxpayer's money and court imposed fines. We may even see the stigma of 'bailiffs' removed!

On a final note, I would like to take the opportunity in print to say thank you to those who have supported me personally over the last two years from within the CIVEA membership and the many friends and colleagues whose paths I regularly cross from clients to debt advisers to my friends at MALG and officials at the Ministry of Justice.

I am grateful to CDER Group for providing me with the time and support to fulfil this important role particularly considering the challenges of the pandemic.

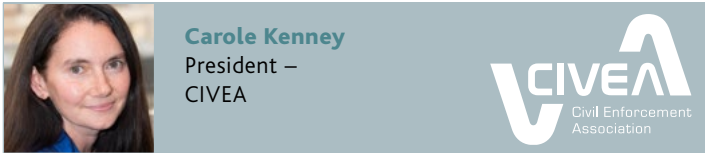
CIVEA are very fortunate to have an exceptional CEO in Russell Hamblin-Boone who has spearheaded the association and works tirelessly to promote, protect and enhance the interests of our members.

Of course, the association would not function without the constant presence, dedication and support from Fran who I appreciate trying to keep me organised!

I do not think I am being biased in saying that this last two years has seen the most consonance within our Executive Council and I genuinely appreciate your unfaltering support, especially when quick and important decisions have been needed.

There have been times when complex matters have arisen and I have been very fortunate to have a 'phone a friend' link to Simon Jacobs, whose knowledge and experience as the longest serving officer of CIVEA has been called upon on more than one occasion. The consistent service Simon has provided CIVEA as Treasurer is hugely commendable and greatly appreciated.

And finally, to our Vice President, Paul Whyte, it has been a pleasure working alongside you and I know our values and aspirations for our industry are completely aligned. You have an exciting tenure ahead of you as we enter a new era for enforcement and I wish you every success and enjoyment in the role.



Baroness Pinnock Liberal Democrat Lords Spokesperson (Levelling Up, Communities and Local Government):

My Lords, given my local government interest, I know it is not how services are provided but if services can be provided. For example, social care—a service provided by both public and private organisations—requires an extra £2 billion a year. Does the Minister agree with the Conservative County Councils Network, which says that Council Tax will need to rise by 8% each year so that basic social care needs can be met?

Lord Greenhalgh, The Minister of State, Home Department, Minister of State (Department for Levelling Up, Housing and Communities):

"My Lords, it is for every council to decide what level of Council Tax it needs to set. Obviously, there is a latitude to increase Council Tax by up to 2% to help support the additional social care costs, but the Government have set out their plan to increase funding to social care, as the noble Baroness knows."



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Building Customer Service into Enforcement

There is currently a lot of talk from various sectors that passing certain cases to Enforcement Agents (EAs) should be delayed or even in some cases not at all. I believe that the approach taken by EAs in these difficult times is the best way to resolve all cases that have fallen behind on their payments, after all, Local Authorities (LAs) have a duty to those that are paying ensuring all possible steps are taken to collect unpaid taxes. The quicker cases are passed for enforcement, the quicker arrangements can be made and cleared before the next year's debt is upon them. 50% of cases are paid without the need for a visit to the property and over 65% of Council Tax cases dealt with by EAs are collected through payment arrangements. The practice of kicking the can down the road will not help anyone in the long term.

EAs collate and use data to understand the customers financial position from the outset, approaching them in the right way at the right time, an approach I strongly believe in. The outcomes have proven to be far better for all concerned, protecting those most vulnerable while ensuring those that can pay do pay.

Training for all staff, whether EAs or Call Centre staff, is crucial to providing understanding of each individual's circumstances, learning to build rapport with the customer to ensure the most realistic outcome with an affordable repayment plan agreeable by all. Using all the tools available to us, whether dealing with the customer on the phone or in person. Conflict management training plays a key role in negotiating repayment of debts. Violence and threats immediately spring to mind when conflict is mentioned, but conflict training deals with any dispute or disagreement and teaches us how to deal with many varying degrees of conflict to ensure we reach a positive outcome for all concerned, not just in person, but also over the phone.

Providing a dedicated Vulnerability Team, taking cases out of the normal enforcement workflow. The team take a different approach to

those customers that have been identified as vulnerable compared to the approach taken to those who can pay but are evading payment, again using the data to determine the workflow, creates less complaints and protects the vulnerable from further enforcement action and unnecessary costs.

LAs and Creditors in general need to understand how they can promote customer service by building this element into contracts and especially how they are monitored. Rewarding the fastest recovery rates does not necessarily promote good practice as the Enforcement Agency is pressured into collecting in full, rather than making sensible arrangements. Contract performance should not be monitored over a short six-month period for example but take into account collections over and beyond 12 months, rewarding those that work with the vulnerable on longer term arrangements again decreasing complaints while ensuring all debts are paid despite their individual circumstances.

Promoting good customer service by monitoring contracts in this way allows the Enforcement Agency to reward its staff pro-rata as the debt is collected, creating fair collections process for all and providing confidence that all cases can be passed for Enforcement whilst still providing good customer service.



Paul Whyte
Partner at Whyte & Co

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REFLECTION & COLLECTION

– the past, present and future of enforcement, 21 April 2022

As CIVEA members emerge from the restrictions imposed by the pandemic, councils are working through the challenges of reinstating enforcement activity.

It is indisputable that public debt recovery has been changed permanently as a consequence of the economic impact of COVID-19. Local authorities face the challenge of covering the shortfalls in their budgets while protecting people facing additional financial pressures of the rising cost of living.

The Cabinet Office is designing policy to reform public debt collection and the enforcement sector is introducing reforms through the establishment of an industry oversight body. In Parliament, a select committee is conducting an inquiry into Council Tax collection. These initiatives acknowledge that responsible recovery of debts to central and local government is imperative in a post-COVID-19 era and will be explored in a wide ranging day of debate and discussion.

For anyone whose professional responsibilities include, or relate to, the collection of Council Tax, business rates or traffic management, this conference is a must, in order to understand the content, effects and broader implications of a post-pandemic economy.

The conference will provide thought leadership on a range of topical issues, see below. To start the day, an expert panel will consider how the government can meet its mandate to collect outstanding debt from those able to pay without exacerbating problems for those in financial difficulty. Is there more that can be done to ensure that the enforcement process is applied in the right circumstances and alternative treatment is used for vulnerable people in debt?

Following on from this, the conference will be hearing how technology has become integral to enforcement operations. Enforcement firms have invested considerably in the early compliance stage to avoid unnecessary enforcement stage visits. Multi-million-pound data investment incorporates leading technology, data, reporting and analytical capability. CIVEA members have partnered with organisations in money and debt advice to use bespoke technology, data analytics and enrichment to inform workflows. The panel will consider how the Digital Economy Act 2017 may support the future provision of further information prior to enforcement and presents options for local government to develop a single customer view across departments.

After lunch, delegates will hear how enforcement firms have an increasing impact on local communities and support local service provision. The government is constantly seeking for value in its procurement and social value is a key component of local authority contracts. But is this an appropriate activity for enforcement providers?

The day will conclude with a wide-ranging debate about the future role of the enforcement sector. Having discussed the key features of the post-pandemic market, a panel of commentators will share views on how the industry and government agencies need to adjust to the new economy.

The enforcement sector is entering a new period of scrutiny. Having worked hard to assure the government and other key stakeholders that it upholds high standards of conduct, the new focus is on fair treatment of people in debt and support for those who are in vulnerable circumstances. Bringing together experts from industry, local and central government, debt advice and the tech sector, this year's conference is a unique opportunity to reflect on progress and contribute to shape modern civil enforcement.

**THURSDAY
21st APRIL 2022**

**De Vere Grand Connaught Rooms,
London**

BALANCING THE BUDGET

(exploring how central and local government can responsibly reduce budget deficits)

- How to balance fair recovery with local government deficits
- How can benefits support prevent enforcement action
- How enforcement firms and local authorities can work together to ensure fair but firm debt recovery.

DATA DRIVEN DEBT RESOLUTION

(how can technology support progressive enforcement practices?)

- The expanded role of enforcement to identify and support vulnerable people
- Making enforcement more efficient by using data to filter the non-payers
- Improving service with self-serve applications
- Government 'single view of debt' pilot schemes.

SUPPORTING COMMUNITIES

- Enhancing enforcement provision with social value
- How enforcement firms support a sustainable local economy
- Incorporating ESG into public sector procurement
- Investing to reduce vulnerability.

THE CHANGING ROLE OF ENFORCEMENT

- Monitoring a modern enforcement sector
- Reimagining government debt management
- The significance of compliance stage
- Recruiting for the future.



Russell Hamblin-Boone
is Chief Executive of the
Civil Enforcement Association



Qualification Versus Accreditation/Endorsement

Since CIVEA recommend that all EAs and support staff should hold recognised qualifications, we regularly get asked what is the difference between an accredited/endorsed course and courses that provide a qualification?

A qualification is a training programme that sits on a regulated framework, such as Ofqual or SQA etc, which is therefore subject to scrutiny from a government department.

Whereas an accredited course is a training programme that is endorsed by another body, such as a trade association/sector skills or awarding organisation. This endorsement basically states that the programme is well structured, has quality control measures in place and meets the key elements required within the trade/sector.

"The correct training of staff improves their skills and knowledge."

Qualifications also have the added advantage of being able to attract funding which can be a major benefit to the learner and are divided into awards, certificates and diplomas, which relate to the number of hours required to complete each qualification. It indicates the size of the qualification.

Award is recognised as any qualification with up to 130 hours of training and equal to 13 credits.

Certificate is recognised as any qualification with between 130 hours of training or 13 credits and 370 hours of training or 37 credits.

Diploma is recognised as any qualification that has over 370 hours of training or over 37 credits.

At IES Training, both Level 2 and Level 3 in Taking Control of Goods courses are qualifications that sit on the Ofqual register of qualifications.

We also believe that once an EA has been working in the industry for two years, they should be thinking about getting trained to Level 3 before reapplying for their certification renewal. This often then creates the question what is the difference between the Levels?

A Level is usually linked to the level of skills and knowledge needed to be successful in the qualification. It represents how challenging the qualification is to the learner. Levels can be compared with the frameworks of other countries; higher levels of the qualification can also be compared to higher education.

Level 2 courses are an intermediate level, they provide good knowledge and understanding of a subject and require the learner to do a variety of tasks with some guidance or supervision defined as 'progression to skilled employment', a continuation of secondary education. Equivalent to GCSE, O level.

Level 3 courses enable the learner to show a range of knowledge, skills, and understanding at a detailed level. Study at this level is more challenging as the learner is required to show increased knowledge of the subject. Defined as Qualified/Skilled Worker entry to higher education or the completion of secondary education. Equivalent to A level, tech level.

What benefits do fit and proper training bring to the business?

The correct training of staff improves their skills and knowledge, allowing businesses to work in the knowledge that staff are trained in a uniformed way and equipped with the tools to perform the tasks at hand. Investment in people and their training clearly shows that they are valued and allows for increased productivity and performance because they are better equipped to reduce the management demand to supervise their activities. Finally it encompasses a better workplace environment for all involved.

At IES Training we believe that the correct training of staff is imperative to a business's success. The training of staff properly allows a business to know that their staff are fully equipped to deal with the tasks at hand.

The Taking Control of Goods National Standards is quite clear within its guidance that EAs should be trained to have appropriate knowledge and understanding of HMRC Provisions, Companies Act, data protection, health and safety, equality and human rights. They are also required to recognise and avoid potentially hazardous and aggressive situations and be able to identify and deal with vulnerable debtors.

Dealing with vulnerable debtors can be a painstaking process for staff but with proper training, this can become a process that runs like clockwork. Training should always include the identification of vulnerable debtors and furnish learners with the tools to carry out this task in a simple manner, ensuring that the individual is clear of the aims and objectives, reducing intrusion and confusion upon the possible vulnerable debtor.

Proper robust conflict management training is also essential.

It teaches the learner not only the skills to be aware of their surroundings, but provides them with the skills to identify

triggers and inhibitors that may affect the debtor's ability to communicate properly. This qualification provides the learner with the skills to de-escalate situations and increase the possibility of a positive outcome.



Andy Coates
Compliance & Assessment Director,
IES Training

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TO DRIVE CHANGE IN THE ENFORCEMENT INDUSTRY**

REFLECTION & COLLECTION

The past, present and future of enforcement



2022 CIVEA AWARDS DINNER
THURSDAY 21ST APRIL 2022

De Vere Grand Connaught Rooms, London

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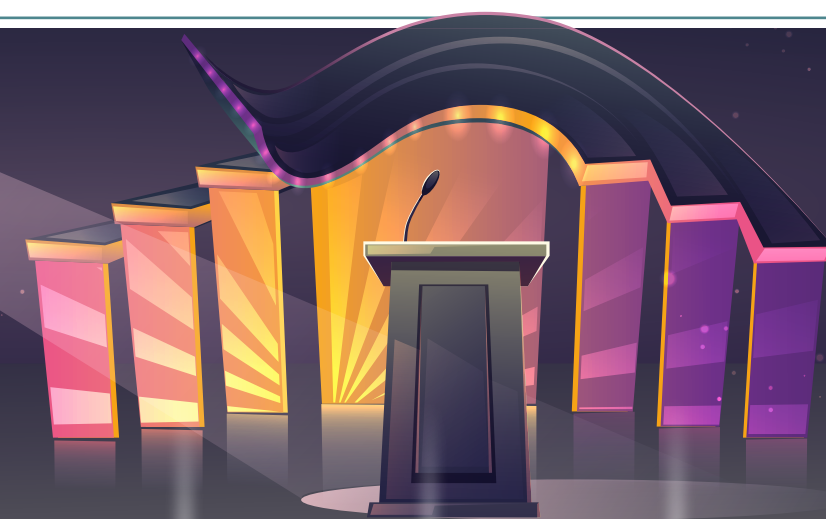
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Why do we need industry events and awards?



Bristow & Sutor is delighted to have been confirmed as headline sponsor of the first-ever awards evening and dinner at the upcoming CIVEA conference. During the previous lockdowns, the enforcement industry had no choice but to transition to online and virtual environments, but physical events continue to make a comeback in 2022. Bristow & Sutor has always been an advocate of technology and we embraced this unique time to adopt digital environments, but it is clear that face-to-face events have a positive impact on networking capabilities and raising fundamental topics of discussion.

We were particularly keen to sponsor the awards night and dinner element of *Reflection & Collection: The past, present and future of enforcement*, as we agree with the importance of recognising the ongoing efforts, commitment and success of leading organisations and personnel. At a time when huge strides are being made in improving enforcement operations, there are countless recent examples of businesses going above and beyond to provide support to central and local government clients, especially in response to the pandemic. It is only right that these efforts should be highlighted and celebrated.

Our business was incredibly proud to score 100% in our recent CIVEA audit and we are keen to build on this result by showcasing further examples of brilliance from the past year, both from ourselves and amongst our peers across the enforcement industry. As well as being confirmed as headline sponsor at the awards dinner, Bristow & Sutor is directly sponsoring the *Tier 3 Innovation in Enforcement* category and we will also be submitting our own entries into some of the other independently judged categories that are up for grabs on awards night.

But why are industry events and awards so important and what are the long-term benefits of collaborating in this way? Firstly, events like the CIVEA Conference reaffirm why enforcement remains crucial to success for local authorities (LAs). It is an opportunity to openly discuss the common challenges the industry faces and work together to form new ways of thinking and adopt best practices. Awards are a superb way to show recognition, but also to encourage others and give insight into the measures that can be taken to raise standards and lead the way.

These events also allow industry personnel to bond over common interests outside of everyday work. For example, some of our members of staff have previously met up for early morning runs around Telford with other like-minded attendees of the IRRV Annual Conference. What started as a sporadic idea between friends has grown through word of mouth, with further runs planned at the upcoming IRRV event in Leeds. There can be no way of predicting what common interests will be shared and we look forward to seeing people connect in this way at the De Vere Grand Connaught Rooms in April.

The Bristow & Sutor Group is comprised of Bristow & Sutor, Debt Recovery Plus (DRP) and Credit Style. With aligned core values of accountability, transparency, respectfulness and integrity, we aim to provide an ethical, compliance-focused and high-quality service to both the public and private sectors. We have found there to be immeasurable benefits to working collaboratively as a group, learning from each other's successes and instilling ways of working based on collective insight, sharing what works and reaching solutions based on insight and data.

We believe in taking this approach in the wider industry too, communicating with partners and peers about what we achieve but also the difficulties we face and how we overcome them. By attending industry events and getting involved in these conversations, we can foster a unified system of knowledge between enforcement firms, that will refine the quality and accuracy of support provided to debtors, facilitate better outcomes for the most vulnerable and continue to improve on overall collections performance.

Discrete conversations between individuals are normally a feature of industry meetups and this ensures a candid understanding of differing views can be obtained. There is also an opportunity when exhibiting in-person to promote approaches related to the services a business provides and also partners and initiatives for the greater good, as seen by the response to The Money Charity, who joined our stand at the latest IRRV Annual Conference and obtained 53 separate nominations to support local community projects. This highlights the incredible networking opportunities made possible when the industry comes together. We look forward to encouraging and facilitating similar conversations in Covent Garden, as well as celebrating the incredible outcomes businesses have achieved over the past year in areas as diverse as technology, social value and communication.

Networking in this manner is unique and bringing together high-profile keynote speakers, exploring innovative exhibitors and sharing thoughts with other attendees remains incredibly important to our approach and achieving our goals. Our commitment to events is intrinsically tied to our support of vulnerable members of society and ensuring we are best placed to help over-indebted people achieve meaningful changes in circumstances.

Collaboratively discussing ideas, combined with showcasing aspirational efforts and results, helps everyone involved to consider the different challenges many people currently face and how we can all ensure our approach remains efficient, firm and fair.



Emma Watson
Head of External Communications,
Bristow & Sutor

Setting Standards in Civil Enforcement

CEQA UK are business consultants appointed to complete audits on behalf of the Civil Enforcement Association. The audits are conducted on CIVEA members to assess compliance with the CIVEA code of practice. CEQA UK was launched in 2021 to provide outsourced compliance services dedicated to the Civil Enforcement Industry.

The team behind CEQA have a proven track record in providing consultancy, strategy and training services within the industry since 2005 and currently work with some of the UK's leading enforcement companies.

David Hazeldine, Lead Consultant at CEQA said *"The Enforcement Industry is increasingly being subject to scrutiny, and enforcement companies are having to adapt and take preventive action to ensure ongoing compliance with changes to legislation, national standards, and the CIVEA Codes of Practice. As highly experienced business consultants, a decision was made to combine this experience with our industry knowledge to provide truly independent outsourced compliance to support enforcement companies manage their compliance obligations, and to improve standards within the industry through a shared best practice approach"*.

As the appointed CIVEA members auditors, CEQA has seen the benefits of the compliance audits on both corporate and private members. David commented that *"The industry is taking a giant leap in the right direction, the CIVEA Code of Practice ensures civil enforcement companies operate not only lawfully, but professionally and ethically also. The audit process offers both an independent review of member compliance, and an opportunity for industry best practice to be shared. The audits are designed to improve overall standards and offer excellent opportunities to improve services through observations and recommendations of improvement. The future of enforcement is already here"*.

Recent feedback in regard to member audits include:

"The process ran very smoothly and my team were impressed with CEQA's flexibility as to how he approached this, given that different people in my team cross over against multiple aspects of the code and in turn audit. As a virtual audit, it ran like clockwork."
– Andy Rose of Bristow and Sutor

"It was nice to have an auditor who was familiar with the enforcement industry – which I know can be hard to find. Working remotely can be challenging but I am sure the team will agree the whole process was a very positive one with constructive feedback throughout."
– Michael Line of JTR Collections

CEQA helps enforcement companies to reduce risk through improving organisational performance by challenging existing assumptions and practices, offering recommendations of improvement, and striving for excellence throughout the entire enforcement lifecycle.

With offices based in County Durham and London, CEQA operate on a national basis, which can be achieved through a combination of remote and onsite consultancy. Services range from independent compliance reviews which provide credibility, internal auditing of systems and processes such as review of body worn video and agent conduct, through to creation of policies and procedures, training courses and more.

As management system consultants CEQA can further help your organisation to achieve compliance, score higher in tenders and become approved suppliers through the implementation of ISO Management Systems. CEQA provide bespoke, tailored, ISO Management Systems for Health, Safety, Quality, Environmental, Information Security and Business Continuity.

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For further information visit www.ceqa.co.uk, call on 0191 687 9021, or e-mail info@ceqa.co.uk. CEQA is a division of HSEQ Smart Ltd.



David Hazeldine MCMI
Lead Consultant at CEQA UK



Setting Standards in Civil Enforcement

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CICM creates new Professional Standards to champion and benchmark excellence in enforcement

A new set of Professional Standards that defines the unique skills and contribution that credit, collections and enforcement professionals deliver in protecting and growing business and the economy has been launched by the Chartered Institute of Credit Management (CICM), the largest recognised professional body in the world for the credit and collections community.

A first of its kind for the profession, the new Professional Standards establish a benchmark and help demonstrate the enormous variety of roles within credit, collections and enforcement at every level, local and global, to attract new employees into the industry and define what skills they need to succeed in an exciting, dynamic and rewarding career.

The Standards similarly act as a showcase for existing professionals – and members of the CICM in particular – to further promote what they do, not only within their own organisations, but also within the wider business community. The Standards serve not as a qualification, but rather as an indication of continual professional development and lifelong learning, to benchmark an individual's progress and identify active goals and targets as part of a realistic career pathway.

Dr Debbie Tuckwood, the CICM's Chief Advisor for Professional Development who is leading the initiative, says the new Professional Standards build from CICM qualifications in Taking Control of Goods and High Court Enforcement and will help transform how a career in enforcement is perceived: *"This is all about raising the profile of people who work in enforcement, not only building their confidence, but also helping businesses understand what enforcement is all about, and what they can do."*

"There are many out there who have only a very narrow view of a career in enforcement, if any understanding at all. Through the Professional Standards we can shift these perceptions, attract more talent into the industry, and demonstrate the skills of existing professionals and see how they benchmark against their peers."

In terms of the detail, the Professional Standards have three key focus areas: business skills; personal skills; and behaviours. All are essential to help professionals progress and are mapped against the four levels of CICM membership: Affiliate, Associate, Member and Fellow. The Standards also provide guidance on the technical area of enforcement.

The Professional Standards have been developed in partnership with representatives from organisations and leading bodies including the UK Government's Cabinet Office, the Department of Work and Pensions (DWP), the Civil Enforcement Association (CIVEA), and the High Court Enforcement Association (HCEOA).

Along with the Professional Standards, the CICM has developed a self-assessment tool to help members plan their development and identify relevant support to further their careers. Debbie believes the Standards are a game changer. In addition to Ofqual regulated qualifications and membership status, Debbie explains that the CICM delivers apprenticeship support and training as well as development partnerships for organisations looking to professionalise their teams: *"The CICM Professional Standards not only complement these development opportunities and accolades, they capture the essence of what it means to be an enforcement professional."*

Reaction from the enforcement sector has been positive. Eric Roe, High Court Enforcement Officer says, *"The introduction of these Standards is a welcomed and necessary addition to the progressive impact that CICM is having within the credit industry. From my background in debt recovery and enforcement, I understand the importance for all in our industry to act with the highest level of moral and ethical standards. It is great to see that CICM are spearheading this movement to enhance professional standards and we are excited to be a part of it"*.

Chris Badger, High Court Enforcement Officer, echoes these views: *"The new CICM Professional Standards establish a structured approach and road map for those new to enforcement and looking to qualify and achieve success as enforcement professionals. The Standards are welcome and are being introduced at a time when the sector is looking to grow and achieve wider recognition."*

Andrew Wilson, High Court Enforcement Officer, says that the Professional Standards are the benchmark by which an individual will be judged. He anticipates that the Standards will be: *"The badge of the professional which is displayed with pride in all business dealings and provide reassurance to the world at large that CICM members aspire to act with honesty and integrity in all business matters."*

Russell Hamblin-Boone, Chief Executive of CIVEA says: *"Given that we are at an advanced stage in developing the new independent industry oversight body, the timing of the new Professional Standards fits well with enhanced scrutiny of enforcement agents. I am sure this will be recognised and supported by all firms. The Professional Standards provide a comprehensive programme that promotes and enhances sector improvements. This is strong evidence to demonstrate that the industry is moving towards consistent and universal professionalisation."*



Dr Debbie Tuckwood
Chief Adviser (Professional Development),
Chartered Institute of Credit Management

Training, the Key to Success

No doubt about it, the world has changed, many organisations have faced severe challenges, not least the civil enforcement industry. We have all had to adapt to the 'new normal' which is still emerging. Our immediate focus should be to deal with the complex problems that have emerged from the pandemic relating to debt recovery. Mental ill-health is on the increase, according to the Health Foundation's director Jo Bibby, who commented that mental ill-health rates have doubled and forewarns of a growing mental health crisis in the UK. Consequently, many of the debts referred for enforcement are not for people who have refused to pay but are for people who cannot pay, due to circumstances. The need now is greater than ever before, to equip people with the skills and knowledge required to deliver ethical enforcement, prioritising fairness and vulnerability whilst also maintaining their own physical and mental health well-being.

Civil enforcement is moving at a faster pace than ever before. The much-needed reform brought about by the Tribunals, Courts and Enforcement (TCE) Act 2007, and the regulations which followed, necessitated the need to keep pace with an ever-evolving industry. Since then, The High Court Enforcement Group (HCEG) have significantly increased their commitment to training, expanding in-house training to prepare its employees to better meet and go beyond the new educational standards demanded by government.

The introduction of the independent Enforcement Conduct Authority will be a welcome arrival, it will not only enhance the professionalism of the enforcement sector, it will also build on the previous reforms and offer more protection through improved protocols for the vulnerable, faced with enforcement action.

"In today's world achieving this balancing act is more important than ever before. The skill set of enforcement personnel must be enhanced to enable them to carry out their diverse range of occupational duties and obligations."

Of key importance is the need to be mindful of vulnerability and mental health conditions when enforcing writs and warrants. Adequate training should be provided and systems put in place to respond appropriately. There is strong social stigma attached to mental ill-health. Sufferers experience discrimination in all aspects of their lives, they struggle with the symptoms and disabilities that result from the disease and are challenged by the stereotypes and prejudice that result from these misconceptions. Consequently, they are robbed of the opportunities that define a quality of life. Misconceptions, stigma and discrimination traps sufferers in a cycle of illness and debt. They may not open or respond to letters, consequently the first person to realise that there may be vulnerability will be the enforcement agent, hence the need for appropriate training.

Training is the key to success and an essential part of our business strategy at High Court Enforcement Group (HCEG). By supporting an enhanced culture for learning, we ensure that challenges are embraced, and staff knowledge and skills are continuously enhanced to improve their capacity and capability to carry out their duties. All customer-facing staff are trained in their own stress management

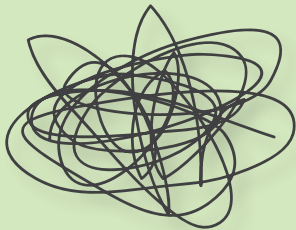
and recognising burnout. Minimising visits and maximising the use of technology and information is a prerequisite of our ethos. Our training programmes are evaluated against levels of quality, underpinned by professional standards, good practice and current research in education and training to preserve and enhance our reputation as a reputable and ethical enforcement agency while upholding our core values.

In today's world achieving this balancing act is more important than ever before. The skill set of enforcement personnel must be enhanced to enable them to carry out their diverse range of occupational duties and obligations.

The only way to ensure that enforcement agents exercise the powers granted to them are carried out with care and responsibility, is to have targeted educational programmes informed by analysis of enforcement roles in conjunction with subject-matter experts, learning and development professionals and the debt advice sector to identify any gaps in industry specific training.

Training must be ongoing for everyone involved in the civil enforcement industry in the twenty first century.

For more information e-mail training@hcegroup.co.uk



David Grimes BA (Hons) IRRV
Head of Training & Development,
High Court Enforcement Group

Making body-worn cameras compulsory

In July 2019, Paul Maynard, the then Justice Minister, announced that all enforcement agents, apart from County Court bailiffs, would be required to wear body-worn cameras.

Since that date, no progress has been made towards making this a reality. The enforcement industry is still awaiting the launch of a Ministry of Justice consultation to move this forward, despite the support for this from the Civil Enforcement Association (CIVEA) and the High Court Enforcement Officers Association (HCEOA), as there are numerous benefits to all parties.

Many enforcement companies and self-employed enforcement agents already use body-worn cameras during their visits. However, without regulation, their usage will be inconsistent. The industry needs those regulations to ensure that all footage is captured and saved according to the same procedures.

Having an indisputable video and audio record of the visit brings many benefits to both parties:

- if there is a complaint, the footage can be viewed to impartially establish the facts of the matter



- the conduct of both the debtor and the enforcement agent will be captured – providing peace of mind if any false accusations are made
- the footage can be used to assess performance and personal development of agents.

In enforcement, we often find that debtors complain to the advice sector about enforcement agent misconduct. I would suggest that the advice sector often takes this anecdotal, unverified information as fact, providing resulting statistics and data that are then presented as quantitative.

The compulsory use of body-worn cameras would enable the enforcement companies and the advice sector to establish the veracity of these anecdotal reports and thereby gain a more complete understanding of the true state of affairs relating to enforcement agent conduct.

In terms of moving forwards, there is one key stumbling block and that is, how long should the footage be stored for? Data storage could be a significant expense for enforcement businesses and self-employed agents, especially as we are talking about very large volumes of video data, potentially stored for prolonged periods.

However, this is no reason to delay the development of a consultation and drafting regulations to make this now long-overdue change happen.



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Director,
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Necessity to change recovery processes in 2022 is not based on predictions or trends

The last two years were completely uncertain for everyone, and the services of a crystal ball or Mystic Meg aren't needed to see the changes happening during 2022.

For those in the business of recovering income in 2020 & 2021, there were long periods of no recovery activity and short, frantic periods when some recovery cases came through.

Whilst many authorities and firms are reporting recovery rates significantly below target, the 'coping with COVID-19 world' around us and how we all navigate it, has changed. Some recovery teams quickly adapted and embraced the digital jump, most could not change, and others did not at all.

The cost of implementing new processes and commercial risk were stated as the greatest objection to change. Whilst this is true, time and tide wait for no man and recovery processes fall more and more out of step with how to best achieve results and get back on track.

How you engage with customers and their experience of this contact does directly affect how they react to requests for payment. Customer experience is no longer a 'nice to have' or irrelevant to enforcement – it is a must have to drive up results.

The coping with COVID-19 world moved private debt recovery firms to prioritise automation, introduce hyper-personalisation, and hard push digital self-service to meet customers' rising expectations and maintain results. Investment by these firms meant rapid changes to processes and technology, to keep in step with the changes we have all experienced and which now form the new 'normal'.

For enforcement and local government, process change and investment does not require a large budget, the dreaded request to IT for development, or trying to fit something new in with the existing corporate digital policy is avoided. Just imitating effective simple processes used elsewhere to level the playing field. Anyone thinking recovery processes could go back to old ways with the same results, will be sorely disappointed.

2022 is about automating digital contact with customer journeys, using hyper-personalisation and multi-channel contact with digital self-service.

Debt recovery processes and resulting customer experience is arranged around several non-related 'siloed' steps – mailed lettering, basic SMS text messages and telephone calls. None of those are formed into a slick process where the results from one affects the other. Why? Because of legacy disjointed systems, patchy data, and resource limitations.

Digital transformation has been on the agenda for years. The pandemic has caused far more delays, but as we return to a business-as-usual approach, a 'digital-first' contact approach is what now works and with some cohorts, is the only option!

A digital first approach for customer contact requires using multiple channels of the next generation of SMS messaging - called RCS and SMS Webforms, intelligent voice services, email messages and chatbots, providing real-time data about how customers interact across all touchpoints. The more personalised you can make the customers journey, the better chance you have of getting a payment. Any generic, non-personalised communications, for example, are now a total waste of time and viewed as junk or suspicious.

Customer journeys and their activity visualisations in real-time, across all channels from digital contact, provide a clear next stage decision process for each customer. From that point, evidence-based decisions to see what customers can or cannot do, are highly effective as opposed to a range of siloed processes with limited or no feedback. E.G. Postage and SMS are baron of reporting.

You then see instantly which journeys worked, where customers

dropped out and critically – who was less inclined to do anything. All these insights allow you to respond to customer issues before arrears and time delays escalate. Automation acts on results and directs the next stage towards debt resolution.

Customers have the expectation to be able to contact organisations via online, email, social media, Chatbots and contact centres and around the clock! The current process currently fails because all these differing systems and data sources aren't consolidated. Voice, email, web chat, social and web self-services, all operate in siloes and do not link to the same data source in the CRM. As a result, customers receive an inconsistent service. This heavily drives up inbound call volumes! There is no single holistic view of who is doing what, where and when.

It would not be possible to imagine any local authority suddenly magicking a new system that co-ordinates all contact channels, data, and systems into one. It's the same for the private sector! So, in 2022 to improve results and keep instep with customer behaviour, you will see a greater drive for the proactive 'digital first' approach – using multi-channel customer communication strategies and suppliers, to generate the best results. Less blast SMS text messaging and mass lettering waiting for the reaction.

All recovery processes then stem from that one original case file that is used on an independent platform, contacting customers, and controlling all the automation and next stage actions. Only the results file at the end of the process goes back to the original CRM systems.

This avoids the complexity, huge delays and costs involved in changing underlying legacy systems. The new process means you can have a single version of all customer activity back in one record to keep.

Debt recovery automation

Automation is essential for income teams to improve positive outcomes, reduce recovery timescales and free-up resources. But the real benefit of automation is its ability to increase payment results.

When you leverage automation, communications that are interactive and co-ordinated do all the work. This not only frees up the scant resources for customers in more need, but it also enables organisations to be more agile to manage future events, such as more lockdowns. Reporting and decision-making are also accelerated because of the real-time insight.

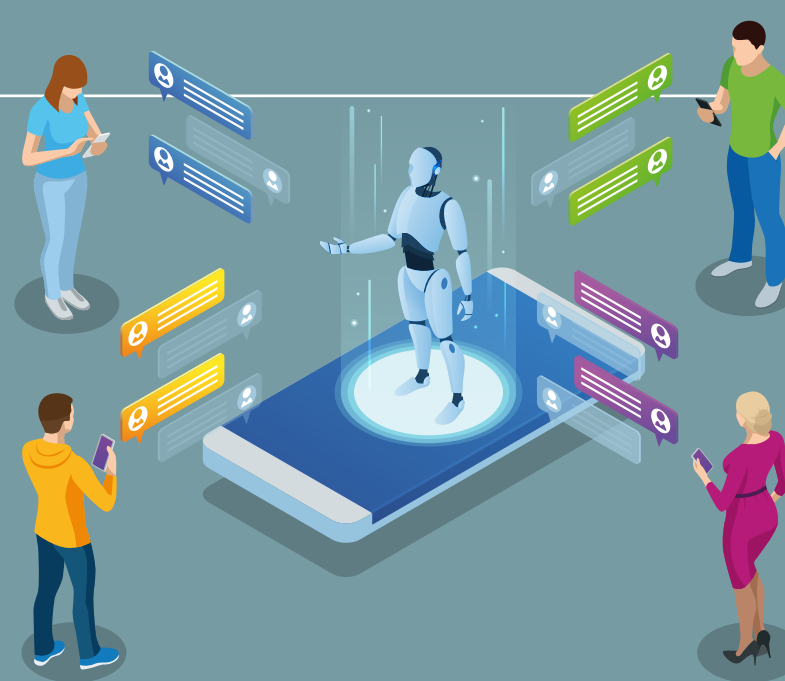
We all experienced scam messages within the last year and customers are worried about the trust factor associated with digitalisation and requests for payment.

Multi-channel customer engagement and hyper personalisation cannot be replicated by fraudsters, unless the very core CRM data was compromised, in which case you have other things to worry about besides debt recovery.

At the start of the pandemic, organisations quickly implemented chatbots to deflect calls to self-service channels as contact centres were closed. Chatbots helped customers resolve issues faster and enabled home working officers to deal with more vulnerable customers and complex cases.

2022 will see even more adoption of Chatbots. These AI-powered services make a huge difference and are not complex to implement. They use Natural Language Processing (NLP) to understand intent, so customers can communicate in a natural manner. This results in a great customer experience while removing the usual mundane and repetitive questions that staff used to handle.

Chatbot adoption must be combined with all outbound channels for the best digital self-service results, not just tagged onto a webpage. Customers expect a wide range of options and channels through



which to make contact. Channel co-ordination, like their journey automation, will be crucial. It is fantastic to offer customers the choice between live chat, messaging chat, WhatsApp, RCS, Facebook Messenger and voice – but only if they are all linked, and the system has access to the same data. Otherwise, you are just creating another frustrating experience.

The Chatbot machine learning will drive continuous improvement across all channels at once, so you are constantly delivering a better service based on the customers behaviour.

The next frontier for recoveries is conversational voice engines or VoiceBOTS. It is much like an Alexa or Google Dot speaker (if you are familiar with that technology). Regardless of attempts to stop customers calling, there will always be customers who prefer

to call in. Existing IVR's tend to be viewed with disdain. They are hard to adjust and very limited in their capabilities, but the new conversational VoiceBOTS will become common in 2022. When implemented correctly, VoiceBOTS deflect inbound calls and enhance self-service by supporting customers with easy-to-solve queries over the phone.

This again, frees up agent resources to handle other tasks more effectively. IVR deflection to chatbots or VoiceBOTS can remove 30-40% of inbound calls if implemented correctly.

As AI continues to gain prominence, particularly within debt recovery, machine learning and decisioning will play ever greater roles in debt resolution and automation around individual case needs.

To summarise, your customers and their expectations advanced greatly during the pandemic, with major shift to digital engagement and interactive self-service. In 2022, all those involved with recoveries must review their customer engagement with an openmind, looking at how digital transformation can improve efficiency and results.

Success comes down to using a digital first approach, using multiple channels linked together to create hyper-personalised experiences in terms of content, channel, and convenience. Evidence based customer journeys, automation with digital self-service and chatbots are key in 2022. The result is reduced costs for your authority, a better experience for the customer and higher results than ever before.



Daniel Pearce
Director of Business Development,
Telsolutions Ltd



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Life in the life of an enforcement agent

ENFORCEMENT – at the cutting edge of human experience. Where do you stand? With apologies to James Joyce and *Ulysses*, here we go:

For preparatory [study](#)¹.

PART ONE. A DEBT

Telemachus (child). Do we leave our children debts? What sort? Do we leave them the possibility of debt? Can we do it all a bit better?

Nestor (school). Teach the indignation of debt owed. But at the back of the class, only the (sickening thrill of) fear. Where does society create the obligation of a debt, especially in relation to government and its so-called services? Nobody owns anyone...in fact, no-one will own anything now and everyone will be...

Proteus (intellect). Ineluctable modality of the bailiff. Time to nip to the loo, take a walk, grab the keys. *Ciao!*

PART TWO. A COMMUNICATION

Calypso (hearth). But where's it all gone?

Lotus-Eaters (city). An impossible job balancing resources, expectations and vulnerability. See Southwark.

Hades (cemetery). No debt should be written off. The digital economy pilot from the Cabinet Office is in its second phase, total 70 councils approx engaged. The project is currently out with HMRC for data modelling. Total £6bn is available.

Aeolus (news).

THE STEVE COPPARD SHOW ROLLS ON... People still to be taken out of debt, not the other way round, said the Cabinet Office.

"VULNERABLE CONTRACTS"

Ms Acutt from Southwark said the 2020 collection freeze may have stopped people from seeking support. Contracts with enforcement agents should allow for flexibility, and feature strategies to help the vulnerable! Watch adult social care.

BOW DOWN TO THE INEVITABLE

Paul Bowden from Wilkin Chapman highlighted the concerns about withdrawal of benefit as far back as 2013, and inconsistency with Council Tax reduction schemes. Council Tax benefit needs to be brought back extensively. Vulnerability cannot yet be identified automatically.

MOORE'S THE PITY

Head of social value and customer welfare at Capita Edd Moore said many people don't classify themselves as vulnerable until they are identified by enforcement agents. But Bristow & Sutor told *CT* the focus needs to be on the old vulnerable as much as the new. That is the root cause of worry.

NOT YET

Apocalypse now? Watch for business insolvency. And Council Tax tipping points.

Lestrygonians (food). For examples of local authority best practice in respect of Council Tax arrears collection, stay tuned for our roadshow, *Compassionate Enforcement Live*, as we go round the country looking at best practice for central and local government. Email gd@credittoday.co with your views on the government guidance for best practice to date!

Scylla & Charybdis (danger). The debt was real. Communicate that. Get paid on time.

Wandering Rocks (action). Mr Coppard from the Cabinet Office encouraged the use of behavioral science techniques, but how will anyone develop that? ... Multiple channels of communication are key [thanks, sponsor]. Mr Shaw from Christians Against Poverty said watch mental health... Early measures such as attachment of earnings work best ... Mr Hamblin-Boone from CIVEA said the new regulatory regime affords an opportunity to talk, analyse and share best practice... Mr Nield from CCS said digitally engage to balance identification of vulnerability with collections...

So get set up! Capture mobile phone data! Create policy!

Sirens (temptation). Overcome embarrassment or shame. Focus on circumstances. Think retail 'look and feel'. Tailor messages. Go for instantaneous data. But use what you have. Share and share alike...

Cyclops (prejudice). – Begob, cries The Citizen, you're telling us to stay out of debt!

Nausicaa (twilight). *Steamy Nights at the IRRV. Eyes of blue, or brown or possibly gray.* Ms Smethurst, from Dukes, made a series of helpful suggestions, urged awareness of change impact on staff, considered manual payment systems, as well as [Breathing Space](#), a 'mixed bag'. She suggested see Charlotte at Southwark for what might be needed. But how many payment arrangements are made, and how many are defaulted on? Can defaults be reported? See Lisa Black, Nottingham. Advice: don't charge the punter, no, no...

Oxen of the Sun (gestation). FCA. MOJ, HMCTS, DWP, HMRC. Three year debt strategy. All feeds into local government. Private and public debt to be managed the same way. Treat customers fairly, signpost free advice, identify vulnerability. Central government to fund incorporation of legislative-based change by local councils. Guidance, policy, law in that order, all under DLUC. Conclusion: voluntary solutions on a practical basis.

Circe (swine).

MISTRESS COMPASSION

You be having your boundaries now then?

DEBTOR BLOOM

(wriggling free)
No, thanks, I'll just take a cigar. Possibly, a vape.

DEBTOR STEPHEN

Two bitcoins, allow me.

THE DEBT

AAAAAarrrrggghhhwwwweee!!!!

ENFORCEMENT NEWS

Is he taking the...?

EDITOR

Oy!

PART THREE. A PAYMENT

Eumaeus (shelter). Well it was a good job 'er old *grandma* was on hand to pay the bloody thing off, now she can get on with her studies and none of this debt nonsense no more! Stone the crows, the old gal could pay us all off, if push came to shove!

Ithaca (confessional).

How do the different schemes of local authority Council Tax support affect Council Tax collection rates?

With a confusing lack of universality, a controversial assumption of continuing universal expansivity, an as yet imprecise calculation of the exact balance of credit and oft ad-induced need, payment and ability.

What reduced to its most basic terms was the relationship between the debtor and the debt?
It would grow and grow and grow.

If the debt was unpaid, would it return?
Mercifully, fortunately, encouragingly, it would.

Where?

*

Penelope (wife). Yes and I looked at her to say yes ask me again with your eyes yes and she asked me again with her eyes and then I said yes I will pay you yes I will, Claire, Yes.

[Keep Britain Solvent!](#)

Credit Today's Compassionate Enforcement webinar – [see summary](#) – took place on 30th November, 2021, and was attended by about 160 delegates from the local government enforcement community, with many more registering, plus industry supporters. Thanks too to [CCS](#) (going for rebrand, being rolled in glitter). And of course, [CIVEA](#)!

ends

1. [Webinar Recording: Compassionate Enforcement \(WATCH\)](#) – Credit Today

Gerard Dugdill

Publishing Director, Credit Today
Organiser of the webinar and 'Keep Britain Solvent' series.



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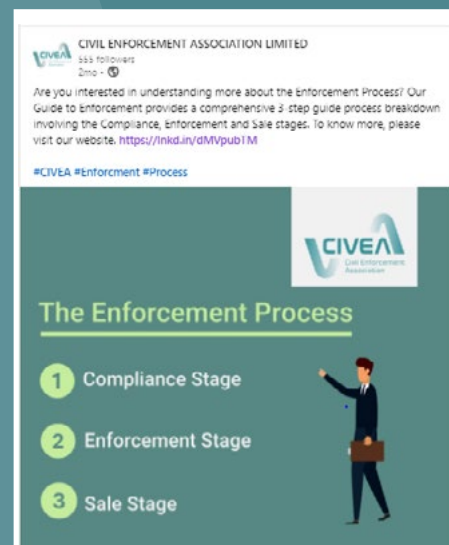
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