

ENFORCEMENT NEWS

The quarterly magazine from CIVEA, the Civil Enforcement Association

SUMMER 2023

The challenge of making a success of the Enforcement Conduct Board (ECB)



CELEBRATING



YEARS OF ENFORCEMENT
1993-2023

The story of **Dukes** began back in 1993, when Colin Naylor established the company to recover unpaid poll tax. Fast forward 30 years, our humble beginnings have blossomed into a thriving family-run business and we're now recognised as the leading ethical enforcement provider in England and Wales.



09

Dealing with Freeman on the Land

Many councils have seen a rise in the number of challenges from 'Freeman on the Land' which is used to refuse compliance with enforcement action.

10



12



13

Procurement for second placement Enforcement

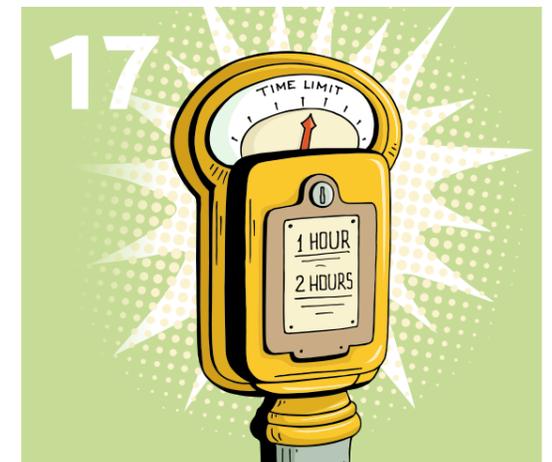
As financial pressures have encouraged councils to explore every opportunity to maximise revenue, second placement enforcement has become firmly established in the collection landscape.

15

Breathing Space helps provide a safety net

On the second anniversary of Breathing Space it's clear that this scheme serves a purpose, a safety net, and in some instances a lifeline to those who have needed it most.

17



19



20

Chat GPT and the future of AI intelligence for enforcement

Artificial Intelligence (AI) is the field of computer science that aims to create machines and systems that can perform tasks that normally require human intelligence and abilities.



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Contents+

CEO's Welcome	05
News & Political Scraps	06
President's Welcome	07
Blog	23

Highlighting fresh scams and sector misrepresentations

Welcome to the Summer edition of Enforcement News. We have recently been the subject of misrepresentation. While this is not a new experience for us, the circumstances are troubling.

Our sector found itself being implicated in the activities of energy suppliers and concerns about the force-fitting of prepayment meters. Several headlines referred to 'bailiffs' as shorthand for the contractors that are routinely engaged by gas and electricity retailers to install meters.

CIVEA responded robustly with an explanation that corrected the inaccurate reporting and distanced ourselves from the energy sector practices.

We explained unequivocally that a certificated enforcement agent is not required to force fit a meter and our members do not carry out this activity.

In fact, CIVEA members activities are strictly controlled by government clients and all enforcement agents undergo rigorous checks before being certificated by a District Judge. An enforcement agent's licence to operate must be renewed every two years.

Local authorities and other public bodies instruct certificated enforcement agents to recover unpaid taxes, fines and arrears under Schedule 12 of the **Tribunals, Courts & Enforcement Act 2007**. Agents are not debt collectors, and only undertake visits to premises after a local authority or public body has failed to recover funds and takes an individual to court under the **Taking Control of Goods regulations 2013**.

By comparison, energy suppliers pass debt to debt collection agencies where they have been unable to recover unpaid bills. The energy sector operates under nearly seventy year old legislation, the **Rights of Entry (Gas and Electricity Boards) Act 1954**, which does not require a certificated enforcement agent when forcing entry into a domestic premises to install a prepaid meter (PPM). Consequently, those undertaking this work are outside of the remit of the Ministry of Justice, CIVEA and Enforcement Conduct Board and the legislation that governs certificated enforcement agents.

Our members cannot take control of goods on premises when a lone vulnerable person is present, and there are strict rules on entry to premises. The agent will need a locksmith and sometimes a police officer in attendance. Often an agent's visit is the first opportunity to identify someone who is vulnerable. Enforcement agents are trained and instructed to identify safeguarding or vulnerability needs and refer these cases to specialist welfare teams immediately and enforcement action is suspended.

The energy industry regulator, Ofgem, has required energy suppliers to sign up to an enhanced code of practice that mirrors some of the practices included in the CIVEA code of conduct. Energy firms must make at least ten attempts to contact a customer before a PPM is installed. Audio or body cameras must be worn by energy supplier representatives at all warrant installations or site welfare visits to check for vulnerabilities, ahead

of an involuntary installation or remote mode switch. All audio and footage must be available for audit.

The CIVEA code of conduct was revised in 2019 and requires members to use body worn video cameras when making contact during enforcement visits. Some enforcement firms are exploring the possibility of recording enforcement agents' mobile calls.

CIVEA has alerted its members to the risks of media misreporting of the legal activities of civil enforcement agents. We are concerned that conflating this issue is irresponsible and potentially dangerous, because it presents a threat to agents in the field where people may confuse what they do and subject our staff to abuse and even assault.

An alternative form of misrepresentation is fraud. We have received several complaints about a company called Court Enforcement Bailiffs, a company which is also known as CEBG Legal: <https://cebg.legal/>. It also trades as Debt Recovery Solutions (DRS) and WIRO. The company demands payment using fake Notices of Enforcement.

The scam is made more convincing by using information from the MOJ Certificated Bailiffs Register. The company has published names of enforcement agent's purporting to work on its behalf on its website and includes the names of agents who work for CIVEA members and hold CIVEA bonds, which may be compromised if EAC2 action is taken. Inquiries indicate that the information on the website is incorrect and this poses a direct risk to our agents' reputations. We have taken steps to advise the individuals concerned that their details are being used. CIVEA has also received correspondence from Ammar Bashir of Court Enforcement UK, who is named as an owner of this company. Mr Bashir is aware his details are being used fraudulently and has advised that he has no knowledge of the company and he has also reported the matter to Action Fraud.

We have alerted Action Fraud, the Ministry of Justice, and the debt advice sector because it is likely that victims will be contacting them for assistance. It is likely that some advisers will be fooled and assume that these are legitimate companies.



CIVEA CEO
Russell Hamblin-Boone

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Russell Hamblin-Boone
CEO,
CIVEA



New Mental Health Guidance

The Money and Pensions Service (MaPS) has published new guidance for creditors on supporting customers with mental health problems. With 1 in 4 of the population experiencing a mental health problem each year, anyone working with a financial service product or involved in debt recovery needs to be alert to the signs of mental illness. The guidance sets out how to make a difference and provides details of practical support to embed it within your organisation.

Impact of Breathing Space reported

The Debt Managers Standards Association (DEMSA) has assessed the impact of the Breathing Space scheme, which took effect in May 2021.

In February 2023 there were 7,312 Breathing Space registrations, which is 26% higher than the number registered in February 2022. Of those, 139 were Mental Health Breathing Space registrations, which is 58% higher than the number in February 2022.

In the first year of the **Debt Respite Scheme**, from 4 May 2021 to 30 April 2022, the total number of Breathing Space registrations was 63,864. StepChange registered 66.5% of all Breathing Spaces during the first year of the scheme. Citizens Advice registered 15.1%, meaning that more than 80% of Breathing Spaces were registered by two charities. Ten money adviser groups registered 93% of Breathing Spaces.

Government publishes updated Debt Management Vulnerability Toolkit

The Government has updated its Debt Management Vulnerability Toolkit, which was developed by the Cabinet Office Fairness Group.

The **Toolkit** is designed to help public sector bodies recovering debt to identify and support all customers, including those who may need additional support. For policy makers and those designing service policies and processes, it offers examples of best practice and changes that can be considered and incorporated into their organisations. It draws on best practice from within the public sector debt management context, as well as established tools and practice from other industries. Alongside the toolkit, is a guide specifically for frontline staff, designed to be used when interacting with customers as a prompt of key tools and guidance.

Over 50% of councils set to cut spending on services

More than half of councils are planning to cut spending on services, increase commercial investments or spend their reserves to make ends meet in the year ahead, according to new research. A report by the Local Government Information Unit (LGIU) also reveals 90% of councils are set to increase council tax, fees or charges. The 2023 State of Local Government Finance report found that nine in 10 are planned to increase council tax by the largest permissible amount without a referendum.

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

Afzal Khan MP, Shadow Minister (Justice): To ask the Secretary of State for Levelling Up, Housing and Communities, what assessment he has made of the impact of local authorities' use of bailiffs to collect council tax arrears on residents.

Lee Rowley Parliamentary Under Secretary of State (Department for Levelling Up, Housing and Communities): *"The administration of council tax is the responsibility of local authorities. The Department has published best practice guidance on council tax collection."*

Daniel Kawczynski MP Conservative, Shrewsbury and Atcham: To ask the Secretary of State for Levelling Up, Housing and Communities, what steps his Department is taking to reduce the level of council tax increases.

Lee Rowley MP, Parliamentary Under Secretary of State (Department for Levelling Up, Housing and Communities): *"Council tax decisions are and have always been for local authorities to take, but the Government maintains a referendum thresholds so that residents can have the final say over excessive increases. Each council is responsible for designing its own Local Council Tax Support scheme to provide help to council tax payers who might otherwise struggle to pay their bills. The Government has also provided councils with £100 million of additional funding to help vulnerable households with their bills in 2023-24."*

Lord Berkeley, Labour: My Lords, does the Minister think that the use of the precautionary principle by those who install the prepayment meters is rarely the kind of judgment that these people are expected to make? Are they expected to make a judgment on whether somebody is 85 or 84? Does it not need to be much more clear-cut as to who can have the exemption and who cannot?

Baroness Bloomfield of Hinton Waldrist, Baroness in Waiting (HM Household) (Whip): *"The noble Lord makes a fair point but, once all the conditions of the code of practice have been met, there must be at least 10 attempts to contact the customer before a prepayment meter is installed. Then when it is installed, which is often with a bailiff, there has to be body camera footage to show that it has been done correctly. The precautionary principle is a very strong bar. If there is any doubt that the consumer is financially vulnerable, cannot pay, and is at risk of being cut off, the meter must not be installed."*

Judith Cummins MP Labour, Bradford South: To ask the Secretary of State for Levelling Up, Housing and Communities, if he has made an assessment of the potential merits of altering eligibility requirements so that all recipients of Universal Credit can access Council Tax Reduction.

Lee Rowley MP, Parliamentary Under Secretary of State (Department for Levelling Up, Housing and Communities): *"Councils are required to have a local council tax support scheme to assist residents in financial need. The design of schemes for persons of working age is the responsibility of councils who are able to take account of local factors including the circumstances of those who receive Universal Credit."*

A thriving enforcement market is essential for viable local government

At the time of writing, an announcement by the Ministry of Justice on the enforcement fee structure and a potential inflationary uplift was imminent. Regardless of the outcome, the facts remain that CIVEA members will continue to face challenges meeting the government's stated ambition for a viable and sustainable industry.

If we look back at the origins of the fee structure as designed by Alex DeHayen, the purpose in 2014 was to maximise collection of unpaid government debt by recovering payment in full or taking control of goods for sale. The fees structure was designed to create an incentive to pay early.

In contrast, the purpose in 2023 is to avoid fees being added to an existing debt by avoiding enforcement action, especially for vulnerable debtors. The National Standards that accompanied the regulations on fees do not reflect this important change.

Civil enforcement has continually evolved. Before a case is passed for enforcement, creditors will have exhausted all other avenues, including traditional debt collection practices. Pre-enforcement action is standard and is the equivalent to pre-action protocol that many stakeholders have called for.

Pre-enforcement involves data cleansing, case matching and linking, DVLA checks and financial profiling. Using debtor's live financial information such as: Open Banking, (status of credit accounts), pending patterns & behaviour, payday dates & frequencies, firms can build up a financial profile of an individual and assess propensity to pay.

All of these services come at a cost and cost not considered by DeHayen back in 2014.

In response to local authority client requirements and a highly competitive market, an additional stage has evolved before the Compliance stage – Pre Compliance.

No fee is collected for this stage and there is no additional input from local authorities, but a significant investment has been made by enforcement firms in technology.

This stage can involve a call or visit from an enforcement agent to ascertain a debtor's circumstances without any taking control of goods action. There may be letters and an outbound communication campaign leading to interventions, such as welfare support offered by council services, debt advice and suspension of debt recovery.

Again, a service which comes at a cost, not considered when the regulations were originally drafted.

The Compliance stage was designed to engage debtors through the receipt of a letter and explain the consequences of further non-payment. It is intended that the £75 compliance fee applied to each case covers the entire cost of the compliance process, which is a complex process to verify details, assess circumstances, identify vulnerability and attempt contact through a variety of channels to arrange payment. It can involve tracing, credit checking, DVLA licensing checks, emails, texts, calls and letters. Around 40% of overdue Council Tax debt is collected at the Compliance stage.

Since 2014, the Compliance stage has been transformed by firms seeking to engage debtors, identify vulnerability, assess income and expenditure, maximise income and benefits, profile for propensity to pay, ensure repayments are sustained.

It is at this stage that there is often misunderstanding about repayment plans. Debt advisers often do not realise that a repayment plan is not a given right and claim that arrangements are unfair. After all, overdue council tax or fines are not restructured debt that incur interest. It is important to understand distinction between fairness and reasonableness. It can be argued that it is unfair to require debtors to pay a debt in-year and to incur charges for non-compliance. Equally it can be considered reasonable for compliant payers not to subsidise the shortfall from non-payment.

There is a significant cost to enforcement activity that does not result in payment of fees. For example, where cases are recalled by local authorities, there are high volume of gone aways, fees are written off fees for vulnerable debtors and, in particular, where poor DVLA data leads to incorrect Penalty Charge Notices and requests from local authorities to refund fees.

The use of tech solutions at the Compliance stage is the same as that used by standard debt collection agencies (DCAs). The significant difference is that enforcement agents have far fewer personal details, usually a name and address, when a case is passed from the creditor.

The shift to sustainable repayments that are reasonable and affordable, requires more investment in multiple communications. The objective is to maintain an on-going dialogue and to engage debtors in a way that meets their requirements and avoids missed payments. Affordability assessment is heavily dependent on good engagement and accurate data.

There is a much deeper understanding of debtors' situations, even though the information available at the outset is far more scant than traditional debt collectors.

The Enforcement stage has remained similar to the process envisaged by the regulations in 2014.

However, the number of enforcement visits and collection rates has reduced because they are used to recover 'hard to collect' debts, which would be either written off or sold on by other commercial creditors. Taking control of goods (or the threat to do so) is a strong incentive for debtors to address their situation.

The Enforcement stage has been enhanced in response to local authority client requirements to meet carbon reduction targets and by enforcement firms to improve efficiency and ESG. This is pure cost with a very minimal return for firms. Additional costs are incurred for removal and storage that may not be recoverable from the sale of an asset.

In addition to operational matters to comply with TCOG, enforcement firms are increasingly expected to support local authority targets, such as carbon reduction targets. It can be argued that enforcement firms should not be forced to deviate from statutory taking control of goods activity in order to meet creditors' statutory duties to social value provision.

While it may be acceptable where this activity is an element of the service, it may not be where costs are incurred for unrelated services, e.g. street maintenance, hedge cutting and installing charging points.

Enforcement firms offer a no cost service to the public sector through prescribed, fixed fees which should not reflect any expectation of further contribution to the client beyond the specific service they are contracted to deliver on behalf of local authorities.

However the Ministry of Justice decides to make changes to the fee structure, it remains the case that civil enforcement is essential for local government finance and to sustain a competitive market for services.

I hope you enjoy this edition of our magazine. Your feedback is always welcome.



Paul Whyte
President,
CIVEA



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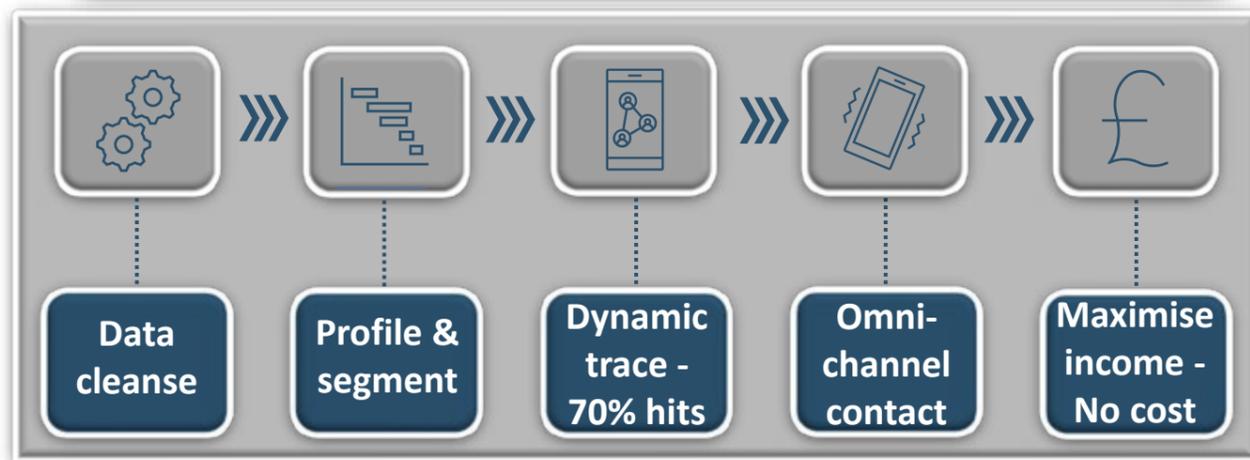
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Dealing with Freeman on the Land



Many councils have seen a rise in the number of challenges from 'Freeman on the Land' (FMOTL) which is used to refuse compliance with enforcement action. The FMOTL movement believe people are only bound by contract law and statute law they have consented to. However, contract law and common law rights are not the same as legislation relating to the administration, enforcement and collection. The position in law is that you do not have a choice as to liability and styling yourself an FMOTL doesn't exempt you from paying.

In my experience, there is little or nothing you can say that will change the mind of an FMOTL. 95% of their communications are nonsense and, what can be asserted without evidence can be dismissed without evidence. However, they occasionally raise a point that does require a response so watch out for this.

They usually commence by demanding evidence of a contract or deed of assignment, none of which we have because it is either irrelevant or not evidence that we are required to provide. They require that documentation carries a 'wet ink' signature and assert that failure to respond within a time limit signifies agreement that the debt is not owed because silence constitutes consent. In fact, the opposite is usually true and consent cannot be assumed from silence. Finally, they threaten to report us to the Financial Conduct Authority (FCA) and claim our actions constitute harassment.

It helps if staff are aware of how we are regulated and of the following legislation and case law:

- **Protection from Harassment Act:** an act pursued under an enactment can't constitute harassment.
- **Administration of Justice Act:** doesn't apply to anything done which is reasonable and permissible in law for the enforcement of any liability by legal process.

- Magistrates Court Rules 109(3) "Where a signature is required on a form or warrant other than arrest, remand or commitment, an electronic signature will satisfy the requirement".
- **Georgiou v Redbridge:** The judge said he knew of "no principle of law that requires a liability order to be recorded in any particular form".
- **Thornton v Rossendale:** EAs have explicit statutory authority to enter premises and don't rely on implied authority.
- **Interpretation Act 1978:** Any notice required to be served by legislation is deemed to have been received unless it can be proved to the contrary. The onus is therefore on the person claiming non-receipt to evidence this rather than for us to evidence service.

Years ago, I used to rebut each argument in detail but now see little point in doing so. The important issue is to let them know that enforcement action will continue. I start by providing any information we are obliged to give and then advise that the remainder of their communication is legally meaningless and is rejected. Finally, I confirm that enforcement will proceed and that we will only respond to further communication if directly relevant to the TCoG Regulations.



Trevor Broadbent
Director of Operations,
Whyte & Co.

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The challenge of making a success of the Enforcement Conduct Board (ECB)

At the start of this month, I had the pleasure of speaking at CIVEA's AGM.

As the new Chief of Executive of the Enforcement Conduct Board (ECB), it was a welcome opportunity to thank CIVEA, and its members, for supporting the creation of the ECB as an independent oversight body for the sector, and for funding us for our initial year.

Launched last Autumn, the ECB has an important mandate to ensure fair treatment for all those experiencing enforcement action.

Personally, I'm very excited about the challenge of making a success of the ECB, as this is a sector that urgently needs a balanced and evidence-based oversight body to provide demonstrable accountability and an independent voice on key issues.

I come to the role with over 15 years of experience of developing approaches and frameworks that put the public interest at the heart of oversight and regulation.

The ECB will not always do as the industry, or other stakeholders, think we should. That wouldn't be realistic or practical. But what I hope we will always do is to engage and listen with an open mind and not shy away from difficult conversations. Above all, we will explain how we have taken your views into account, and why we have made the decisions that we have.

An example of this is the published report of the findings from the recent public consultation on our first-ever business plan. The report can be found on our [website](#) – it summarises the responses that we received and how we've taken these into account when finalising our business plan for the year ahead.

Our final business plan lays out five priorities for the coming year – which are set out in the box opposite.

The most imminent project is this summer's launch of an accreditation scheme which will be an important and useful public record of enforcement firms who have signed up to the ECB's oversight.

Given the support we have received so far from the industry, I am hopeful that we will get extremely wide coverage of the market through our accreditation scheme.

In my next column, I will be explaining more about this scheme and how you can sign up to it.

We are starting our work in full recognition that asking you to put your trust in the ECB is a leap of faith. But we are committed to listening to you and firmly believe that an effective, independent ECB will be as good for the sector as it will be for the wider public.

So thank you for the support you have given us to date – we look forward to working with you all to deliver our mission of ensuring that everyone experiencing enforcement is fairly treated.

“ Personally, I'm very excited about the challenge of making a success of the ECB, as this is a sector that urgently needs a balanced and evidence-based oversight body to provide demonstrable accountability and an independent voice on key issues. ”

To achieve the organisation's potential, our work will be governed by three overarching themes.

Firstly, we will be working with a full understanding and appreciation that **when it is done right and fairly, enforcement work is an important public service** – one that plays a key role in supporting the ongoing funding and delivery of important local services to citizens, as well as helping to underpin our wider economic model by ensuring that debts to any party are honoured by those who can afford to do so. And we recognise that Enforcement Agents do hard and often dangerous work, and are more likely to be stigmatized than thanked for it. It will take time, but I think that independent oversight can be helpful in recognising the public value of fair enforcement work, as well as rooting out incidents of poor practice that can harm the whole industry.

Secondly, we will be **transparent and accountable**. We will make it easy for the industry, for the debt advice sector, for creditors and for the general public to know what we are doing and why. We will actively look to engage everyone in our work, sharing ideas and holding ourselves to account.

We've already started publishing my monthly CEO's reports to our Board, as well as regular newsletters and blogs. And from the Autumn, I will be writing a regular column here in Enforcement News in which I will be sharing news, updates and developments.

Finally, and perhaps most importantly of all, we will be a **listening organisation committed to fully immersing ourselves in and understanding the sector, from all perspectives**. We will be working to ensure that we hear from a wide range of voices and take all views into account in our oversight.



THE ECB: Our five Priorities

1 EVIDENCE

There is an urgent need for robust evidence, published in full, by an independent body.

We will develop this robust evidence base to inform our work, establishing a reliable baseline, to give a true sense of how often issues arise and, when they do, of what is happening.

We will also introduce quarterly data returns from the industry to inform our oversight.

2 COVERAGE & ACCREDITATION

We will have oversight of as much work as possible under the Taking Control of Goods Regulations.

The High Court Enforcement Officers Association (HCEOA) is supportive and we will be including high court work within our oversight and will also be looking at in-house teams in Local Authorities.

Over the Summer of 2023, we will be launching an accreditation scheme which will provide a means of identifying those who have signed up to the ECB's oversight.

3 COMPLAINTS

We will be developing a model and processes to take on responsibility for second-tier complaints handling from CIVEA and the HCEOA. We are planning to go live with this next year.

4 STANDARDS

We will develop new standards for work in this area, to establish more clearly and comprehensively what should be expected of enforcement firms and enforcement agents. This will include consideration of important issues such as vulnerability and affordability. In developing these standards, we will be engaging and consulting widely.

5 OPERATIONS

We will continue to develop and build the ECB into an impactful and cost-effective oversight body.



Chris Nichols started at the Ministry of Justice in 2008 – helping to bring in a pioneering new regulatory framework for legal services.

Moved to the Bar Standards Board in 2010 – set up new approaches to barrister regulation to meet the requirements of the new legislative framework; developed a supervision function and led the first-ever round of on-site audits of barristers' chambers.

Moved to the Legal Services Board, the oversight regulator for the whole legal sector in 2014 – his last role there was as Director of Policy and Oversight.



The risks of long term frozen statutory enforcement fees

By freezing statutory enforcement fees for nearly a decade, risks increase rather than reduce – it is now time to act.

The *Taking Control of Goods (Fees) Regulations* came into effect on 6th April 2014, introducing both a Compliance Stage and a single charge for all Enforcement Stage activity.

The long-frozen statutory fees that had been in place prior to the 2014 reforms had been cited as contributing to increased economic pressure on enforcement agents. The independent economist appointed by the Ministry of Justice in 2009 to review the enforcement fee structures had been clear that:

'To maintain the ongoing relevance of the Fee Structure, between any major reviews such as the current exercise, the level of fees should be adjusted annually to track inflation.'

Responses to the February 2012 consultation on 'transforming bailiff action and providing more protection against aggressive bailiffs' evidenced widespread stakeholder understanding of, and support for, periodic inflationary uplifts to the statutory enforcement fees:

'The majority of respondents agreed that the costs structure should be updated to take account of inflation prior to implementation and should be updated annually by indexing to a measure of inflation.'

Consistent with the economist's recommendation and stakeholder views, the Explanatory Memorandum to the *Taking Control of Goods (Fees) Regulations 2014* set out an annual inflation review and implementation mechanism:

'It is the Department's intention to review, annually, the fees set out in the Schedule. This will take place following the publication of the CPI figure for each September. The April 2012 fees and CPI figure will be used as the baseline each year. The baseline fees will be uplifted with reference to the most recent September CPI figure.'

The success of these measures is evidenced by the fact that ten million court orders have been processed without adverse media comment by CIVEA members in the last three years. Given the nature of the work and the sensitivity of the pandemic, this is an achievement that its members are rightly proud of.

CIVEA and its members also responded to the pandemic by proactively reaching out to the Centre for Social Justice in the summer of 2020, and to the debt advice sector, to suggest the creation of a non-statutory, independent oversight body that would be funded by the industry – and this has since resulted in the creation of the Enforcement Conduct Board, which has the widespread support of all stakeholders.

Enforcement is a sensitive process that is rightly subject to scrutiny. That does not mean, however, that the statutory fees should remain frozen, as that would increase systemic risks rather than reduce them.

Clarity on uprating statutory enforcement fees for the first time in nearly ten years would help long term funding discussions with the Enforcement Conduct Board to conclude, which would then help the Enforcement Conduct Board to become fully operational prior to the Ministry of Justice reviewing progress within the two-year timeframe it set out in the spring of 2022.

It would also reduce economic pressures faced by individual enforcements resulting from a combination of long frozen fees and the rising cost of living.

CIVEA members would also then be able to make investment decisions and to obtain external funding – both of which are needed to make ongoing investments in raising standards.



Gareth Hughes
Enforcement Expert

"It is the Department's intention to review, annually, the fees set out in the Schedule. This will take place following the publication of the CPI figure for each September."

Over the course of nearly a decade, there has not been any uprating of the statutory fees to reflect inflation, which has eroded the economic value of the statutory fees by a quarter. By contrast, enforcement fees in Scotland have risen to reflect inflation five times since the start of 2013, and are expected to uprate again this year. HMCTS' own court fees increased to reflect inflation in 2021, and were backdated to August 2016. Enforcement of unpaid court orders in England & Wales is the only service to have its fees frozen for so long.

The modern warrant recovery process has significantly evolved and professionalised since 2014. 40% of all warrants paid are now obtained without sending an enforcement agent at all. When agents do visit, it is today rare for them to remove goods. Body worn video cameras have also been introduced and are now mandatory.

The reduction in reputational risk was reinforced by the industry's response to the pandemic. CIVEA members proactively took a wide range of measures to ensure that customers (debtors) were engaged with sensitively.

Procurement for second placement Enforcement

As financial pressures have encouraged councils to explore every opportunity to maximise revenue, second placement enforcement has become firmly established in the collection landscape. This was emphasised in the IRRV's recent response to the MOJ's Review of Enforcement Agent Fees: dated 16/02/2023, which noted – *"Where one contractor has been unsuccessful, it is common practice to 'recycle' the LO to a second provider, which can result in a 10-15% success rate"*. Indeed, some companies are achieving even greater success with Hambury Tilmond reporting audited collection rates over 20% on Council Tax Liability Orders returned by other enforcement firms as uncollectable. Best practice would therefore suggest that all local authorities should be including provision for second placement enforcement into their procurement process, but how is this best achieved? A number of councils cover off second placement provision by adding this onto the main enforcement service as a secondary award with, for instance, the top two enforcement firms awarded first placement with the third-placed contractor awarded recycled cases. However, is this 'consolation prize' approach to enforcement procurement missing a trick?

To help inform procurement it is helpful to understand the current enforcement market. Since the introduction of the 2014 regulations, the enforcement landscape has evolved with larger firms handling the bulk of first placement work and smaller firms developing and actively promoting the recycled market. This secondary market is now well established with a number of specialist firms refining their collection procedures to profile these more difficult-to-collect cases to maximise recovery. Internal systems have been refined to try to prompt engagement and payment whilst protecting the vulnerable, and enforcement agents (EA) have learnt

to adapt their approach for this hardened caseload without the need for heavy-handed enforcement.

The Pandemic has exacerbated this market split with hundreds of EA's leaving the industry. Larger companies have generally been forced to focus their limited EA resources on first placement contracts, with recycled work receiving little attention. Smaller firms more dependent on recycled work have had to 'up their game' in order to maintain collections.

This market split means awarding second placement contracts to larger firms bidding for first placement may not achieve maximum collections, as it is likely the recycled work will not receive the same level of input/attention. Investment in office support will likely be less forthcoming given the lower returns and individual EAs won't prioritise visiting recycled cases over fresh accounts.

To achieve the additional 10-15% (or more) referred to by the IRRV, a separate approach to procurement would therefore appear preferable. Some councils have tendered using separate lots for enforcement provision, which has encouraged smaller specialist companies to bid for recycled contracts, leaving larger companies to focus on first placement. These councils have found that having a second placement provider fully focused on collecting recycled cases provides a useful benchmark as to the performance of their main contractors as well as maximising collections overall.



Adrian Bates
Senior Business Consultant,
Hambury Tilmond

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Breathing Space helps provide a safety net

On the second anniversary of Breathing Space it's clear that this scheme serves a purpose, a safety net, and in some instances a lifeline to those who have needed it most. However, it's also clear that it has not taken off to the extent initially predicted.

Breathing Space registrations rose to approximately 70,000 in 2022, which was an increase on the 2021 figures, but is still not to the level many estimated prior to being brought in. We see Breathing Space as an additional layer of protection that provides an outlet and support for those most in need. However, with many advice agencies being short staffed and receiving higher volumes of enquiries than in recent memory, are the advice agencies finding Breathing Space complex and hard to manage compared to longer standing initiatives?

Within the enforcement industry we have spent over a decade reviewing and assessing the best way to look after all vulnerable customers, providing particular care to those who are financially vulnerable, as this directly affects our industry, our clients, and essential public funding. While it's fair to say that the industry and advice agencies haven't always seen eye-to-eye, in recent years the need to work closer together has been recognised and acted upon. A prime example of this is the creation of the Enforcement Conduct Board (ECB) towards the end of 2022, where the enforcement industry and the debt advice agencies collaborated effectively, with support from the Ministry of Justice, to bring the ECB into existence.

Through heavy investment across the civil enforcement industry over the last decade, enforcement agencies now have the tools to identify a customer's propensity to pay. This means that initial correspondence can be tailored to suit the individual customer, and

we can now provide digital technology so customers can set up arrangements without feeling judged by speaking with a human being. Our Welfare teams are also specially trained to show empathy and understanding to the customer's individual circumstances.

There is no denying that the processes and technology introduced to protect vulnerable customers within enforcement are excellent and lead the way in this very important area. Indeed, the civil enforcement industry's processes now align across many sectors, utilising and replicating best practice to enhance our customers' experience. This is evidenced by the fact that we are often approached by other sectors to talk to them about our initiatives so they can learn from us and adapt them for their specific circumstances.

So, while Breathing Space provides an often necessary respite for customers to organise their problem debts, it is just another tool in an armoury providing a safety net if all else fails.

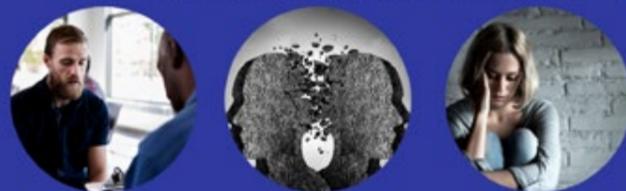


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Further details can be found at:

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How do Local Authorities procure PCN debt recovery services to ensure the best value and quality of service?

In my almost 30 years of working in the parking and traffic sector, I have been fortunate to be involved in the procurement of many parking and road traffic enforcement-related services. In that time, I have been on both sides of the procurement 'table' with 20 odd years as a Local Government officer, leading the procurement and evaluation of tender submissions from the private sector and, for the past 9 years, on the side of the tenderer, assessing opportunities as they come out to tender, compiling the business case and both writing and reviewing tender submissions.

Over those past three decades, I have seen many changes in the way PCN debt recovery services have been procured by Local Authorities, and a change in the view as to whether a formal procurement process is required at all.

For many of the earlier years of decriminalised parking enforcement, there was a strong and prevailing view that there was actually no need to follow a formal procurement process for what was then called 'bailiff' but now more commonly and correctly titled 'enforcement agent' services, as there are technically no direct payments from the Council to the service providers for the recovery of unpaid PCNs. It was a common view that such services therefore fell out of the scope of EU procurement rules and, whilst there remain many Service Level Agreement-type arrangements for PCN debt recovery they are becoming less common. These days more and more Local Authorities see the need for more formal, competitively procured contracts with appropriate standards and performance levels and robust, regular contract monitoring activities being undertaken by Council Officers, especially in relation to customer service and protecting vulnerable debtors.

Whereas in the past, performance was often solely judged on the collection rate achieved by the suppliers, more and more Councils are quite rightly placing much more emphasis on customer services standards, the volume of founded complaints made against the supplier and the supplier's approach to dealing with vulnerable debtors.

There are, of course, different options Councils can adopt in securing the services of enforcement agents services, each with its own benefits and shortfalls, and over the nine years I have worked in the private rather than public sector I have seen them all.

Some Councils chose to include the provision of these services in other procurement Lots for wider parking and traffic enforcement services such as PCN issues and back-office processing. It is, perhaps, the option that requires the least amount of work and effort on the part of the Local Authority in both the tender process and operational management. However, I would say that such an option does pose the most significant risk to the Council. The bidders for such services may have preferred enforcement agent suppliers that are not based on the quality of service those suppliers will deliver to the Council, but more on personal preference or perhaps financial 'profit sharing' agreements, with the lead supplier taking a 'cut' of the fees applied by the enforcement agent or requiring an 'access fee' for the supplier to be issued each warrant. Such agreements not only have the potential to create a conflict of interests, but the Council itself will also no doubt have a heavy weighting to the cost and quality of the core service being delivered, rather than the capabilities and quality of service being delivered by the subcontracted enforcement agent.

Other Councils use one of several established procurement frameworks which, in practice, are intended to provide the Council with a more straightforward and simpler route to market for such

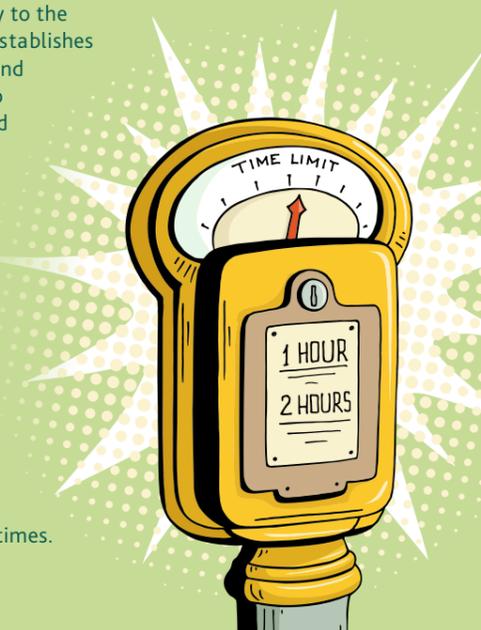
services via a 'mini procurement', and the ability to appoint one or more pre-approved suppliers that have already been through a procurement process to enter onto the framework.

On the face of it such frameworks provide Local Authorities with access to a lighter touch, less resource-intensive procurement process, but to work effectively the Authority will want prospective tenderers to respond to specific questions or meet certain standards that have not been specified or evaluated in the original framework process. They also do not reduce the Council's obligations in respect of tender evaluation or reduce the need for the Council to manage the services throughout the contract period. These frameworks also restrict the number of enforcement agents that may bid for the Council's work and so potentially may exclude smaller, innovative, and perhaps more suitable suppliers from bidding. It is also worth noting that such frameworks are not free services, with the two largest charging the enforcement agent suppliers a fee which, alternatively, could be passed on by the supplier to fund additional value direct to the Council themselves.

Based on my experience in both the public and private sectors, and given the nature of enforcement agent services and the high sensitivity and the public profile of the activity being delivered to Local Authorities, I firmly believe that there should be no compromise or shortcuts when it comes to tendering for such services.

I believe that the best route to market and the one that poses the lowest risk, whilst delivering the highest value and ensuring the Local Authority delivers the highest quality service possible, is through a direct procurement rather than the other two routes detailed above. Whilst I accept that direct procurements place more pressure on Council Officers, in my experience, it is the only one that ensures the Council and taxpayers can have the most confidence in that the Council will get the quality of service it needs. It is the only process that will generate the greatest competition in the market and that will be tailored specifically to the Council's exact needs. It establishes

a much more productive and efficient work relationship between the Authority and supplier and places the Council in total control of such an important aspect of the PCN debt recovery process. Finally, given that there are no additional fees payable to a third party by the suppliers, it has the highest probability of generating the highest level of added value back to the Council which is increasingly important in these ever-challenging times.



John Mason
Director
Road Traffic and Road User Charging



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Is your team ready for body worn video?

In the summer of 2023, the Government will likely run a consultation relating to making a body worn video (BWV) compulsory for all enforcement agents, whether employed privately or by a local authority.

This is a move widely supported by the industry, including both CIVEA (the Civil Enforcement Association) and the HCEOA (High Court Enforcement Officers Association).

Under the proposal, BWV will be worn by all enforcement agents when undertaking the Schedule 12 procedure to take control of goods whatever the debt stream.

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Chat GPT and the Future of AI Intelligence for Enforcement

The rise of AI

Artificial Intelligence (AI) is the field of computer science that aims to create machines and systems that can perform tasks that normally require human intelligence and abilities. AI can involve various aspects such as learning, reasoning, perception, decision-making, natural language processing and more. AI applications can range from simple tasks like speech recognition and face detection to complex ones like autonomous driving. But how can Machine Learning (ML) and Natural Language Processing (NLP) help enforcement?

First of all, ML and NLP technologies can help automate the work of enforcement operations by filtering relevant information and extracting useful insights from the vast amount of data available. Machine Learning is a branch of artificial intelligence that enables computers to learn from data and make predictions or decisions without this being explicitly programmed. Natural Language Processing is a subfield of machine learning that deals with the analysis and generation of natural language texts.

One of the applications of Machine Learning and Natural Language Processing in enforcement is that it creates a personalised customer contact strategy, and the content is based on obtained financial information, the case history available and combining this with reporting from the initial proactive digital communications (Emails, Rich communication services, SMS Webform and chatbot conversations). Proactive communications and chatbots provide the best current and real-time data available from which enforcement can act or understand a customer with. Mailed letters and basic SMS text messages are dinosaur communications, being one way only with limited success and no intelligence gained.

Machine Learning is a great technology better looking at all the financial data and historic case data than staff filtering spreadsheet data based on debt values and debt age etc. Machine Learning can look more in-depth at every case. Machine Learning is capable of filtering out the false positive result as it can take into context the words contained within the records.

Another application of Machine Learning and Natural Language Processing in enforcement is to create an 'analytics profile' that can extract key information from all the filtered sources, such as previous addresses, last payment dates, the value of last payment history etc., and present them in a structured and concise way to the staff.

The analytics profile can also use Machine Learning and Natural Language Processing to generate a summary of all the data sources that highlights the main points and provides additional insights or recommendations to the member of staff for business recovery strategies.

The new frontier of generative AI

One of the emerging technologies that can help enforcement is generative AI, such as Chat GPT. GPT is a deep learning model that can generate natural language texts and content based on a given input. It can learn from large amounts of data and produce coherent and relevant texts on various topics. GPT can be used to enhance enforcement in several ways:

- It can generate concise and fact-based chatbot conversations based on any known data, such as payment history, conversational objections and historic timelines. This will save time and create resources for business analysts, who can focus on more complex tasks that require human judgment and expertise.

Since the end of 2022, there has been a surge in stories and articles regarding the use of Artificial Intelligence (AI), its possibilities and public fears. These articles and enthusiasm are aimed at the new significant advancements made by generative AI, such as Chat GPT. But how can AI and generative AI be applied to enforcement applications?

To see the benefits, you first need to understand how Machine Learning (ML), Natural Language Processing (NLP) and generative AI (Gen AI) work within business processes creating efficiencies, higher outcomes and cost savings faster.

As the artificial intelligence area is very much for most businesses and industries still in its infancy, the number of opportunities and those with ideas tend to heavily outweigh the actual case studies currently.

So, to explain the potential in basic operational terms, members of staff have to rely on a mixture of publicly available financial data, their own experience, personal communication skills and in recent years some monitoring of social media, when dealing with customers to progress each case to reach a settlement or make fair arrangements. In effect, they have to filter the information they hear, say and read manually, scanning through large volumes of data physically or mentally to identify relevant information. This is a time-consuming, resource-intensive process and very expensive. In reality, due to the volume of cases, the business has to profile all cases at the start of the process, organise the data and then target the most collectable first.

AI not only completes the profiling far faster using the combined staff experience it has been taught, but can create efficiencies and strategies to target all cases and not just those that have the best chance of a quick payment.

Even on a basic level, it will provide intelligence that the business can use to adapt and leverage other tools it already has in place to provide timely, accurate and actionable insights.

- It can provide additional analysis for predicting the propensity to pay based on comparable cases. This can help staff to prioritise new stage strategies and enable the business to widen the volume of cases that it processes currently.
- Generative AI will help staff gain more insights and knowledge from the data and to improve their skills and expertise, especially those that handle conversations with customers directly.
- Although generative AI is still in its early stages, it is expected that more use cases will emerge in the coming years, especially when AI tools can be trained with an organisation's internal data and methodologies.

In summary, businesses already have all the tools required to make recoveries, but they also have limited time, resources and expertise to optimise these and generally put a cap on costs per case. AI looks, and is, expensive but investment now and the perceived risk are worth the effort, even if you only attempt to join the dots very simply at first to gain better business decisions.



Daniel Pearce
Director of Business Development,
Telsolutions Ltd

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