ENFORCEMENT

NEWS

The quarterly magazine from CIVEA, the Civil Enforcement Association

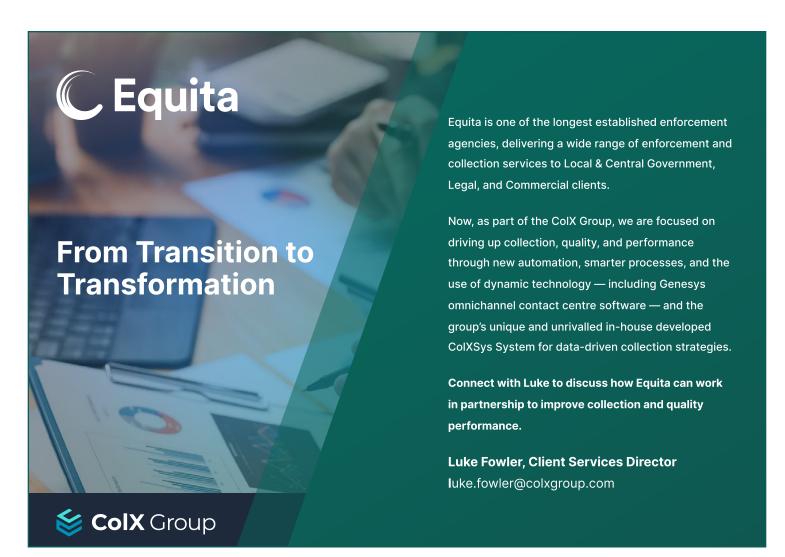
Wellbeing series launched

New debate column

CIVEA Conference announcement

Must-have Diary Dates for 2025







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Rethinking fee
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stronger enforcement
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The future of enforcement
Join CIVEA at its 2026 conference and gala dinner

CIVEA CEORussell Hamblin-Boone

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Wellbeing is more than a policy in the enforcement industry. Behind every successful enforcement team are colleagues working to support their wellbeing to help them

handle the challenges of

the role.

This regular feature will shine a light on the businesses dedicated to keeping enforcement professionals at their best.

To start the series, Chris Moulson, Head of Enforcement at Rundles, discusses the importance of wellbeing and the support provided by the business.



Chris Moulson Head of Enforcement at Rundles

When I first became an enforcement agent 14 years ago, conversations around mental health and wellbeing were rare. Today, things have changed, and they must change.

Enforcement work is uniquely challenging, both mentally and physically. Agents face difficult conversations, emotionally charged environments, and ever-increasing public scrutiny.

Looking after our own

Putting Enforcement Agent wellbeing first

At Rundles, we've made it our mission to ensure that our agents are not only supported, but genuinely cared for, both on and off duty.

As Head of Enforcement and a qualified Mental Health First Aider, I bring first-hand experience to the role. I've been there. I understand what a tough day can look like, and more importantly, how to spot the signs when someone isn't themselves.

That's why I make it a priority for both myself and my supervisors to maintain regular contact with every enforcement agent. We don't wait until something's wrong, we stay present, checking in and keeping lines of communication open.

It's often the small signs that matter: a drop in confidence, a different tone on calls, or a change in working style. When we notice those indicators, we act. Whether that means suggesting time off, assigning a mentor for regular check-ins, or operating our 'buddy-up' system, where supervisors go out alongside struggling agents.

We do everything possible to provide tailored support. Every agent also has direct access to our enforcement support team during all operational hours, ensuring that help is always available, day or night.

Wellbeing is a team effort. At Rundles, all managers and supervisors have experience in the field. They understand the realities of the role and are equipped to mentor, guide, and support from a place of experience.

We also hold regular EA Community Sessions, safe spaces where agents can talk through difficult cases, raise concerns, or simply share how things are going.

Our "Resolve Together As One Team" ethos is not just a slogan. It's our way of working. Whether it's finance, HR, line managers, or our dedicated Welfare Team, there are multiple points of contact for every individual. Agents never have to deal with issues alone.

Crucially, our Employee Assistance Programme (EAP) offers 24/7, confidential support covering everything from bereavement to relationship breakdowns and financial advice. It's completely free and accessible for our employees and their families. And that's just one part of a comprehensive wellbeing package that includes gym membership contributions, volunteering days, long service awards, death-in-service protection, and more.

The enforcement industry has made important strides in acknowledging the pressures our agents face. But acknowledgement isn't enough. We must back it up with action, structure, and culture. At Rundles, we are committed to being part of that change and to looking after the people who look after our communities.

Amy Collins, Managing Director of Rundles, said: "Our people are the heart of our business. Enforcement agents carry out some of the most complex and emotionally demanding work in public service.

"That's why their wellbeing is not just a priority, it's a fundamental part of how we operate. I'm incredibly proud of the compassionate, proactive culture we've built at Rundles, and of the steps we continue to take to support every individual in our team.

"From mental health to physical safety, our duty of care is non-negotiable. We look after our own because that's what great employers do, and I'm delighted that this commitment has been formally recognised through our accreditation as a Great Place to Work."

A few words from some of our Enforcement Agents:

The dedicated EA Support team are always on hand, making life on the road more efficient...

I've been with Rundles for a year now, after working with a couple of other firms before. What's really struck me is how supportive the team is and how much collaboration is encouraged, we really do 'Resolve Together, As One Team'. The structure here means I can focus my time on the cases that are most likely to pay, while our dedicated Welfare Team provides support to any vulnerable customers I come across. It feels like a genuinely joined-up way of working.

Since coming to Rundles
I've enjoyed the help and
support from the office...and
management that is always
available with practical advice...

CEO's Welcome

Welcome to the Autumn edition of Enforcement News.



Russell Hamblin-Boone CEO, CIVEA



Ahead of the summer recess when Parliament takes a break, we had a flurry of announcements. We were encouraged to hear the Justice Minister, Sarah Sackman, confirming that an effective enforcement system is essential, to deliver court awards to claimants in a straightforward and timely manner, whilst treating debtors with dignity. She was announcing the long-awaited proposals for changes to The Taking Control of Goods Regulations, which included the fees uplift promised by the previous administration. The new Government has honoured the proposal for a 5% increase in enforcement fees, and a related increase of 24% to the threshold where a percentage fee (7.5%) can be recovered. This means an increase from £1,500 to £1,900.

The Government has listened to industry calls for a consistent Compliance stage period, which does not differentiate between individual and business debt enforcement. There is a consistent 14 day Compliance stage, increasing from 7 days, with an option for a further 14 days to be requested by an authorised debt adviser. This is a notably tougher line than the previous Government, which may reflect the precarious financial position of some areas of Local Government.

Equally firm is the Government's ruling to prohibit creditors from seeking rebates from enforcement fees. This is another lobbying success from CIVEA and its members.

The Government is seeking more debt to be recovered without the need for enforcement visits and is encouraging more use of payment by instalment. We are likely to see more moves to achieve through changes led by the Enforcement Conduct Board, such as a review of the Notice of Enforcement. I am pleased to report that CIVEA has been appointed to the HM Treasury Fairness Group, which brings Central and Local Government, the debt advice sector, and the debt collection industry together to improve how Government interacts with people in debt.

CIVEA will be pressing for future fee reform to reflect additional costs, such as Enforcement Conduct Board and investment in technology solutions. The Government has committed to review the fees in three years' time and we will be holding Ministers to that timeline.

A statutory commitment to increase fees annually by the Consumer Price Index inflation rate would offer financial certainty and enable continued investment by our members. We will also be lobbying for legislation to restrict profit sharing mechanisms and control the weighting of social/added value in procurement policies.

It is critical that we control the spiralling costs

that members are absorbing without an increase in revenue. We will be monitoring closely the Enforcement Conduct Board to ensure that the £3 million already invested leads to positive outcomes. The Ministry of Justice is consulting on statutory powers for an industry regulator, which is likely to be the ECB. The powers would provide the ECB with a statutory identity and guiding principles, including the right to compel firms and local authority inhouse teams to pay a levy and be authorised by the ECB if they wish to use the Taking Control of Goods procedure; allow the ECB to take over the certification process for individual certificated agents and the authorisation process for High Court Enforcement Officers; to introduce a power for the ECB to share data with other regulatory and public bodies; and empower the ECB to recommend future changes to its scope to oversee other areas of enforcement if required.

We have already heard from members who strongly oppose the delinking of enforcement agent certification from the judiciary. We strongly support the involvement of the courts in approving certificates.

This gives reassurance to members of the public that enforcement agents are fit and proper persons to undertake the very sensitive work involved in recovery of hard to collect debt, often from vulnerable individuals. Furthermore, it gives credibility to enforcement agents' appointments that are legislated by the Tribunals, Courts and Enforcement Act 2007.

Of the reforms proposed, this is the one that we will fight most hardest against. Other than cost cutting, there is no justification for removing judges from the certification process – and look where austerity got us under the last Government.

With regards to vulnerability, as we go to print, the ECB has published its Standards on Vulnerability and Ability to Pay consultation. We have been closely involved in the development of the draft and will provide a detailed response on behalf of CIVEA members.

We have a varied and interesting range of articles in this edition of Enforcement News, and we are always looking for new content. Please enjoy reading the magazine and let me know if you would like to contribute an article or take out an advertisement.

ALL CHANGE AT MINISTRY OF JUSTICE

Prime Minister Sir Keir Starmer carried out a major reshuffle of his Cabinet, following the resignation of Angela Rayner from her position as Deputy Prime Minister and Deputy Leader of the Labour Party. Starmer has replaced her with former Foreign Secretary, David Lammy. He will be both Deputy Prime Minister and Justice Secretary, which suggests that the Justice role may not get the level of attention it had when Shabana Mahmood was Secretary of State. The Ministry of Justice also has two new junior ministers, Jake Richards MP and Baroness Levitt. Their departmental responsibilities are yet to be announced. Fortunately for our sector, Sarah Sackman remains in post as Minister of State. We also saw the departure of Jim McMahon, as Minister of State at the Ministry of Housing, Communities and Local Government. He has been replaced by Alison McGovern, who is likely to take a less combative approach to our sector as she oversees the consultation on council tax administration and collection. Along with many members, CIVEA has responded comprehensively to the proposals.

COLLECTION RATES FOR COUNCIL TAX AND NON-DOMESTIC RATES IN ENGLAND, 2024 TO 2025

The latest data on the receipts of council tax and non-domestic rates collected during 2024-25 and the arrears outstanding at the end of the financial year in England and Wales has been published.

By the end of March 2025 local authorities had collected £40.3 billion in council tax that related to 2024-25 only, and had achieved an average in-year collection rate of 95.9% in 2024-25, broadly the same as the previous year.

In 2024-25 authorities collected a total of £26.4 billion in non-domestic rates, irrespective of the year to which it related. This was an increase of £2.8 billion over the figure for 2023-24.

At 31 March 2025, the total amount of council tax still outstanding amounted to £6.6 billion. This is a cumulative figure and includes arrears that may stretch back a number of years. This is an increase of £642.6 million over the figure at the end of 2023-24.

At the start of 2024-25 there was £6.0 billion of council tax arrears outstanding.

In Wales during 2024-25, billing authorities collected 95.6% of council tax billed, a decrease of 0.4 percentage points. The amount collected in respect of 2024-25 bills, excluding council tax reduction scheme, was £2,228 million out of £2,332 million collectable. During 2024-25, billing authorities collected £50 million of arrears and wrote off £9.2 million as uncollectable.

The total amount outstanding at 31 March 2025 was £263 million, of which £103 million was in-year arrears.



Ruth Cadbury, Labour Brentford and Isleworth Commons

To ask the Secretary of State for Housing, Communities and Local Government, how (a) local authorities and (b) magistrates' courts can obtain liability orders under the Council Tax (Administration and Enforcement) Regulations 1992.

Jim McMahon, Minister of State (Housing, Communities and Local Government)

Where a council tax debt remains outstanding following a final notice, the council may apply to the magistrate's court for a liability order confirming this debt. The individual will be issued with a summons to appear before the magistrate's court. Where the court is satisfied that the amount is payable they will issue a liability order for this debt. Regulations 33 to 36A of the Council Tax (Administration and Enforcement) Regulations 1992, set out the processes councils must follow in obtaining a liability order.

The Government is currently consulting on modernising and improving the administration of council tax. As part of this it is seeking views on changes to the process for obtaining a liability order, including the time before a council can seek this and the fees involved.



Ben Maguire (Lib Dem, North Cornwall)

To ask the Secretary of State for Justice, if she will make an assessment of the potential merits of establishing an independent statutory regulator for High Court enforcement officers.

2

Sarah Sackman (Minister of State (Ministry of Justice)

Whilst most High Court enforcement agencies have already signed up to the Enforcement Conduct Board's independent voluntary accreditation scheme, the Government believes that it is necessary to take action so that all High Court Enforcement Officers, enforcement agents and agencies are regulated to the same standards and overseen by the same body when using the Taking Control of Goods procedure to enforce debts. A public consultation was launched on 9 June 2025 to explore how best to achieve this. Responses to the consultation will inform legislation to be brought forward as soon as parliamentary time allows.





Tony Vaughan (Labour, Folkestone and Hythe)

To ask the Secretary of State for Housing, Communities and Local Government, whether she has made an assessment of the potential merits of additional powers for local authorities to instigate stronger penalties against repeat illegal parking violations.

å Ji

Jim McMahon (Minister of State (Housing, Communities and Local Government)

Local Authorities are empowered to determine their parking arrangements, as they are best suited to understand the best way of responding to local needs. They must do so in a way which meets standards set by national Government that parking policies should be proportionate, support town centre prosperity, and reconcile competing demands for kerb space, and ensure traffic moves freely and quickly on their roads and the roads of nearby authorities as required in the Traffic Management Act 2004.





Shannon (DUP, Strangford)

To ask the Secretary of State for Housing, Communities and Local Government, what steps she is taking to help prevent dangerous parking in residential areas.

Jim McMahon (Minister of State (Housing, Communities and Local Government)

Parking is the responsibility of local authorities, and they are best placed to decide what is best for their local area. Local Authorities are empowered to determine their parking arrangements through the Traffic Management Act 2004, which requires them to ensure that parking policies be proportionate, support town centre prosperity, and reconcile competing demands for kerb space whilst ensuring traffic moves freely and quickly on their roads and the roads of nearby authorities.

President's Foreword



Welcome to the Autumn edition of Enforcement News

Sarah Naylor President, CIVEA

We have seen a flurry of consultations related to public debt collection, including proposals on council tax administration and the regulation of civil enforcement.

The new Labour Government appears to be taking a firmer line on debt recovery than the previous administration, perhaps reflecting the pressures on public finances since the pandemic. Encouragingly, officials are seeking facts and robust evidence on which to base policy proposals.

Too often, politicians and sections of the media have been critical of civil enforcement, with some campaigners even calling for a ban on the use of Enforcement Agents. Such calls reflect a limited and often biased understanding of the process, which is a core function of our justice system.

It seems contradictory that, at a time when debt advice charities are reporting increased levels of household debt, there are proposals to reduce enforcement activity. That is akin to seeing a rise in crime and cutting police numbers. The public would rightly question how laws can be enforced or communities kept safe if the very mechanisms designed to uphold order are removed.

Much of the criticism stems from outdated stereotypes of bailiffs portrayed in popular culture, rather than recognition of the sophisticated, regulated work carried out by Enforcement Agencies and their certificated Enforcement Agents. Campaigners frequently conflate the challenges of a regressive council tax system with the legal

and carefully prescribed enforcement process that ensures taxes, penalties, and fines are collected for the public purse.

The most recent example of misrepresentation is claims that local authorities are following a process by which anyone missing a single monthly council tax payment receives demands for full payment and within six weeks and you can have bailiffs at the door asking you to pay the whole year's bill. This is nonsense, as anyone with knowledge of council tax collection can testify. Nevertheless, it plays into damaging stereotypes, unnecessarily increasing fear among residents and potentially worsening debt problems.

The LACEF board recently published data highlighting these misconceptions. Its analysis of the 2025/26 council tax round demonstrates that in 95% of cases, the first liability order hearing takes place only after 10 weeks or more. In many cases, it is months before an account is passed to an Enforcement Agent. A similar false narrative has been applied to committal proceedings for nonpayment of council tax, with critics suggesting that people are routinely threatened with prison. In reality, Councils must exhaust all other methods of collection before applying for committal, and the court must be satisfied that non-payment is due to wilful refusal or culpable neglect. This process protects those who are genuinely unable to pay, with courts having the power to remit debts where appropriate. Importantly, a committal to prison does not mean the person will be imprisoned if payment is made. No individual has been sent to prison for non-payment of council tax

CIVEA is keen to encourage informed debate on these issues. In this edition of Enforcement News, we are pleased to feature perspectives from both local authorities and debt advice organisations.





What customer calls are you missing?



Daniel Pearce Director of Business Development at Telsolutions

All businesses would like to think they handle all inbound calls from customers efficiently and don't miss any opportunities to take a payment or progress a case, but in reality that is impossible to achieve at peak times or outside of the working day.

During the last 20 years, the communication tools we all use such as mobile phones have vastly changed, but in the same period the systems used for handling customer calls by staff and contact centres may have been upgraded, but fundamentally they have not

Customers will call a central telephone number and be greeted with an IVR (Interactive Voice Recognition) message and menu. Customers make keypad selections for the department they want to speak to or connect to automated systems, like payment lines. All very basic and functional, but we all get fed up waiting to speak to someone and the automated services are about as sympathetic and as helpful as

management and lack the capacity to make outbound calls for various applications. For staff being on the front-line managing customers who have been on hold for 15 minutes, this is not the easiest or most rewarding job.

In a perfect world, all calls would be answered in seconds where you were recognised by your number and handled by the same person who could understand your needs and then there would be follow-up outbound calls and messages to remind you of appointments, payments and agreements.

That utopia may not be completely possible now, but the private sector has been rapidly switching on Voice Assistants creating huge capacity uplifts. These services understand and adapt to customer emotions and responses accurately, and they also fix the large issue of being able to make outbound calls

to customers throughout the day.

Like their chat-based cousins, Voice Assistants are turning voice conversations into conversions using the power of Al.

What is a Voice Assistant?

It's an artificial intelligence-powered system designed to handle inbound calls but also make automated phone calls to customers on behalf of the business. The Al Voice Assistant can initiate calls to a list of contacts without human intervention.

Current Automated Voice Messaging / Interactive Voice Messaging services, can only make the initial outbound call using pre-recorded voice scripts and connect live customers to officers or an IVR. Voice Assistants are different in that they start the call, manage the entire conversation and complete the call objectives in one step.

Both outbound and inbound calls processes are connected for the first time! Therefore a Voice Assistant can be used for payment arrangement reminders, surveys and customer service follow-ups. Voice assistants leverage Generative AI and Large Language Models (LLMs), to accurately understand and reply to customer queries.

The potential for enforcement applications is huge. Voice Assistants will enable existing contact centres to massively increase their capacity and capabilities, and for revenue and benefit teams to tackle many of the obstacles and inefficiencies they cannot resolve today.

In practice what could a Voice Assistant achieve?

Outbound call contact

Using a completely personalised script that incorporates far better security features, Voice Assistants have fully interactive conversations with customers, measuring sentiment and adapting the conversation with empathy. They can send payment links, answer queries and provide support.

Proactive follow-ups

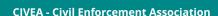
Proactive follow-up calls to customers is mainly missing in practice because of resource limitations and cost. Voice Assistants complete these tasks massively boosting contact rates. If the second call was created as a follow-up to the initial call and lack of progress, the virtual assistant can link the second call to an officer.

Welfare and Vulnerability

Staff, like customers, have off days, and when the pressure is on to listen and support during each call there will inevitably be mistakes. Voice Assistants don't get tired and can provide advice and support around the clock when customers need it the most. They can transfer the call to a specialist officer in welfare support or even schedule an appointment.

> Voice assistants are handling the vast majority of the calls at a growing number of organisations that are implementing them, using Al to improve staff workloads, not replace them.

Traditional IVRs are disliked by pretty much everyone and they create a tension that does not help the customers' patience or the staff handling the customers. Voice Assistants can be implemented as the paracetamol relief for a raft of ailments that all contact centres suffer from now.



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New Debate Column

Council Tax Collection on Trial: The Case for and Against Prison Sentences

People fall into debt for all kinds of reasons.

Many have a life shock which throws their income out of kilter; a large proportion struggle with the cost of living; and lots are simply living on insufficient incomes.

For most types of consumer credit and regular bills, missing payments or falling into arrears can have negative consequences - yet none so severe as resulting in a prison term. Yet for council tax, this isn't the case.

As it stands, current regulations permit a prison sentence for "wilful refusal" or "culpable neglect" in cases of non-payment of council tax. Whilst the number of people actually committed to prison is small in the grand scheme of things - just 16 since 2019, with 532 given suspended sentences – the regulation creates an implicit, or in some cases explicit, threat of a stint behind bars.

We know that this threat is sometimes inappropriately deployed

to the financially vulnerable, and there have even been some big miscarriages of justice – such as R (Woolcock) v Secretary of State for Communities and Local Government & Welsh Ministers [2018] - where it's been found the decision to commit certain people to prison was unlawful.

Even if efforts are made to frame the risk of imprisonment in the most sensitive and accurate terms - which we know isn't always the case - the existence of this sanction alone causes long-lasting, damaging consequences for financially vulnerable households. Some turn to unaffordable, harmful borrowing as a result, while others describe deeply concerning mental health impacts - for themselves, and even their children.

Encouragingly, some policymakers have already stepped in to tackle this. In Wales, the imprisonment sanction was revoked in 2019, with its "outdated and disproportionate" nature recognised by the Welsh Government. Crucially, statistical analysis undertaken by Policy in Practice indicates that the removal of the sanction has not affected council tax collection rates in Wales.

Ultimately, our thirty years of experience on the frontline of debt advice and our recent report Looking through the keyhole tell us that this sanction creates a counterproductive culture of fear amongst already vulnerable individuals.

It is for these reasons that the Government must prioritise placing compassion at the heart of the council tax collection process, and this begins with ending the outdated sanction of imprisonment - which hangs over too many people in financial difficulty - once and for all.



Peter Tutton Director of Policy at StepChange



Impact of the Removal of Committal Sanction in Wales.





Matthew Evans Head of Service - Revenues & Benefits, Wrexham County **Borough Council**

In 2019 the Welsh Government amended the regulations so that Councils could no longer consider using committal to prison in relation to Council Tax Debt.

In Wales the Council Tax Reduction Scheme is different to England, and includes 100% council tax benefit support to those who need it.

Whilst there were only a few councils in 2019 that were still proceeding with committal applications in court, many councils did undertake work in engaging with customers who potentially could have been subject to committal action. This resulted in many taxpayers making agreements to pay their council tax debt who, over time, were able to break the cycle of debt as they developed confidence whilst engaging in paying their outstanding debt.

Ultimately a very useful engagement tool in the process has been lost. Consequently, the reduced opportunities to engage has left councils having to consider charging orders or, in the more extreme cases, bankruptcy. These are incredibly expensive and limited options and are only possible in limited circumstances where there are large debts.

The financial impact to councils of the withdrawal of the committal option is noticeable. In 2019/20 the arrears to Welsh councils was £109m, in 2024/25 this figure has increased to £263m. Whilst this cannot be attributed solely down to the removal of committal, it is a contributing factor.

The Welsh Government is aware of the impact on local revenue, with councils reporting increased arrears and that there are more cases for which they can take no further action because existing processes have all been followed and taxpayers have failed to engage.

Whilst councils are becoming increasingly more advanced in the use of data to improve the levels of engagement with customers to help them pay council tax, there will always be people who make conscious decisions not to pay council tax. A growing example of this is an increase of Freeman of Land Cases, where some customers try to play the system and not pay.

In these cases these debts could ultimately end up being written off, which means that those council taxpayers who pay their council tax end up paying higher council tax to subsidise the cost of pursuing debtors and writing off uncollected council tax.

The increasing levels paint a clear picture that some alternatives are needed to help improve how councils engage with customers and support debt repayment.

What subjects would you like to see debated in future issues? Email michelle.wilson@plmr.co.uk to let us know

Why it is vital complaints are managed in the right way

When you look at complaint handling rules for firms (in every industry I can think of), they work on the basis that every customer behaves a certain way, follows the process and we react and respond accordingly.

But real life doesn't quite work like that, and people don't always do what the process expects them to do or behave in the way they are 'expected' to behave.

Increasingly, customers can (and do) share their unhappiness about firms on the public stage, relying on the sway of public opinion to get their cause noticed and resolved. Sometimes it is for good reason – a last resort by a customer at the end of their tether because they haven't been listened to. Sometimes it is done to create noise and attention, in the hope that it will force a firm's hand into giving them everything they want (whether warranted or not).

Where does this leave us when it comes to how we manage complaints? Can we, should we, be open to inviting customers to complain? I completely agree with the being more open bit, but I can see the practical challenges enforcement firms could face around the inviting complaints part. New and existing clients of enforcement firms may not be so receptive to the idea of firms actively inviting more people to complain.

Some customers are simply unhappy that they need to pay back what they legitimately owe and can afford to pay back or, are embarrassed an enforcement agent has correctly come knocking at their door. Should we be inviting those to complain? Or should we only be inviting complaints from consumers who have received poor service, not been treated fairly or have become involved in something that has nothing to do with them?

In a world where perceptions and impressions are heavily influenced by numbers, too many complaints can have people believe that the firm is bad at what it does, whereas too few complaints can lead people to question whether a firm can be that good. It's often more complicated than that.

The customer isn't always right. But neither are we, and if we get things wrong, we need to put them right as quickly as possible without a customer having to jump through hoops to get

So, whether a customer specifically contacts us to complain, or a complaint comes about because of the answer we've given (quite often it's not the answer but the way the answer is delivered), what is in our control is how we respond in that moment.

There are compelling arguments for us being better at how we identify complaints, how we manage complaints and making our complaint handlings teams accessible to customers to talk to. In my time as a CARE panel member for the Civil Enforcement Association (CIVEA), I saw too many complaints escalate simply because the customer was unable to talk to someone, (normally the person looking into their issue in the complaints team), about their complaint.

Not being able to talk to someone is a sure-fire way to wind someone up and drive them to feel that they have no other option but to escalate their complaint or press the social media button.

No-one wants that. No-one needs that.

Aside from building trust and all the other behavioural science aspects to handling complaints well, there's another reason why being open and available to talk to customers about their complaints is important. I don't know how a firm would be able to demonstrate that it has investigated a complaint thoroughly, has truly got to the bottom of what the complaint is really about, and properly understood a customer's perspective, without the complaint handler having had meaningful contact with that customer.

I believe in treating customers fairly. I've spent a considerable amount of my career reviewing disputes between parties who have fallen out. But I don't believe in the whole 'complaints are a gift' mantra. Complaints are only the tip of the iceberg, and I believe we can learn a lot more about what's working and what isn't, from our daily - often very routine -interactions with our customers.



Rather than inviting complaints, it's about being inviting of complaints.

The cue we can take from the Enforcement Conduct Board is about how open and receptive we are to complaints, and how easy we make it for our customers to tell us when they think or feel something is not right.

And to the future. Could our aspirations be higher? Could we get to a point where we're able to spot when something isn't quite right and do something about it - without the customer necessarily needing to complain or being invited to make a complaint to get a problem sorted? Now there's a thought.



Caroline Wells Owner/Founder Caroline Wells Consultancy





Kevin Still MCICM Director of **Debt Managers** Standards Association

What do we mean by 'Tell us once' in vulnerability management?

The UK Regulators Network (UKRN) Annual Delivery Plan¹ for 2025–26 outlined its programme of work to deliver 6 strategic objectives aligned with the 2024-27 UKRN Strategy. The plan included collaborative initiatives and vulnerability strategies. Membership includes the FCA, Ofgem, Ofwat and Ofcom.

All of these regulators have developed or updated their vulnerability strategies through the course of 2025. The HM Treasury Fairness Group has continued its work with central government, local government and the private sector to develop its vulnerability guidance and specific areas of focus, like Economic Abuse. There appears to be shared thinking between the public and private sector, including those involved in the supply chains. We are seeing new innovation groups alongside those around affordability, including wider adoption of the Standard Financial Statement (SFS). Affordability data sharing is heading down a similar path as vulnerability data sharing.

This encompasses cross-sector data sharing and consistency around what we mean by 'Tell Us Once'.





Tell Us Once

The government offers a 'Tell Us Once' bereavement service that has promise, but falls short when it comes to notifying firms that are not part of central or local government. A registrar will explain the Tell Us Once service when you register a death.

In the Spring edition of Enforcement News, I discussed accelerating enrolment in Priority Services Registers (PSR) with better data sharing between energy and water providers. Water providers have now shared their final vulnerability strategies with their regulator. Ofwat may now be replaced by another regulatory body following recent government announcements. These strategies now need to be deployed whilst the sector undergoes major transformation, including the recommendation to replace provider specific social tariffs with a common national scheme and significantly increase the awareness of support services available.

Conclusion

It is inevitable that consumers requiring additional support in one sector are likely to require the same support with another essential service provider, which may be a utility, Local Authority, Central Government Agency (e.g. DWP, HMRC) or critical financial services provider. This is where an effective 'Tell Me Once' approach becomes critical, especially in terms of getting essential services providers and their outsource agents to routinely check for updates.

Consumers need to be able to control their data and the purposes that it is used for. They need to take some responsibility for their actions, including where carers or other third-parties are involved (e.g. debt advice providers). We are only at the start of the journey, however, we need to ensure that we remain forward looking, which will include the wider adoption of AI to support these objectives.



10 Design Principles for vulnerability data sharing

Chris Fitch, Christine Tate, Dan Holloway, Elizabeth Blakelock, Faith Reynolds, Jo Giles, Johnny Timpson, Lee Healey, Shani Dhanda, Steve Crabb, Vanessa Northam and myself are all co-authors of the '10 design principles for vulnerability data sharing' from May 2024. In February 2025, this group produced a starter guide for essential services entitled 'Help! What support can firms give disabled consumers and people in vulnerable situations?' The Enforcement Conduct Board and CIVEA are now looking at this challenge within the enforcement sector. We strongly recommend engaging with some of the subject matter

Over the past two decades there has been evolution in financial services around the approach to vulnerability, which has informed the principles of vulnerability data sharing.

Support Needs Framework

Moving from labels of vulnerability to clearly defined and standardised descriptions of the support required.

Tell Us Once Mechanisms

Exploring centralised systems where customers can disclose support needs once and have them shared across multiple firms.

Digital Identities and Wallets

Potential use of trust frameworks and digital tools to control and share vulnerability-related data securely and efficiently.

Al in Training

Simulating vulnerable customer scenarios using AI to train staff in safe, realistic environments.

Aggregated Accessibility Data

Concept of "accessibility descriptors" for products to allow comparison and better consumer choice.

Cross-sector Registers

Linking priority service registers across financial services, energy, telecoms, and delivery sectors for consistent support.

- ¹ ukrn.org.uk/publications/ukrn-2025-2026-annual-<u>delivery-plan</u>
- moneyadvicetrust.org/wp-content/ uploads/2024/05/10-design-principles-consumervulnerability-data-sharing.pdf

Rethinking Commercial Debt Enforcement:

A Response to Access to Justice Challenges

As the Justice Select Committee launches its inquiry into Access to Justice across England and Wales, attention is turning to the structural inefficiencies that hinder fair and timely resolution of civil claims.

Among these, the enforcement of County Court Judgments (CCJs) via Writs of Control remains a persistent bottleneck—particularly for commercial creditors seeking redress.

The Writ Process: Structural **Shortfalls and Operational Friction**

Despite its critical role in the enforcement ecosystem, the current Writ process is often opaque, fragmented, and inconsistent.

Commercial creditors face delays in transferring judgments to the High Court, limited visibility into case progress, and a lack of standardisation in how enforcement officers are instructed.

These issues disproportionately affect small and medium-sized enterprises (SMEs), which may lack the resources to navigate the system or absorb the costs of failed enforcement.

Abortive Fees and Allocation Inequities: A Barrier to Recovery

Abortive fees are charges levied when enforcement attempts fail and are a particular source of frustration.

Creditors may incur costs without any guarantee of recovery, undermining confidence in the enforcement process.

Additionally, the allocation of cases to High Court Enforcement Officers (HCEOs) is often inconsistent, with no clear mechanism to ensure fairness or transparency. This can lead to perceived bias, inefficiency, and duplication of effort.

Remote Court Users (RCU): A Centralised **Model for Reform**

In response to these challenges, Remote Court Users (RCU) has launched a platform designed to streamline the enforcement of commercial debt.

Rather than positioning itself as a disruptor, RCU offers a collaborative model that aligns with existing stakeholders, creditors, legal professionals, HCEOs, and HMCTS.

Key features of the RCU model include:

- No Abortive Fees: Creditors are not charged for unsuccessful enforcement attempts, reducing financial risk.
- Preservation of Existing Relationships: Legal teams can continue working with preferred

HCEOs, with RCU facilitating direct instruction.

- Fair Allocation: Where no preference exists, cases are allocated on a cab-rank basis to registered HCEOs.
- End-to-End Case Management: RCUprovides oversight from instruction to resolution, improving transparency and accountability.

RCU estimates that its model could unlock up to 650,000 additional Writs annually, compared to the current volume of approximately 154,000. If realised, this could generate up to £64 million in revenue for HMCTS, funds that could support digitisation and reduce pressure on County Court

Founder Amir Ali OBE notes that the initiative is focused on doing "one thing well for the benefit of all in society". A second phase will introduce a Legal Aid Foundation to support those without means, further aligning the platform with the principles of access to justice.



Amir Ali Founder and CEO of Remote **Court Users**

CIVEA Conference & Gala Dinner 2026

A Turning Point for Enforcement

The CIVEA conference is a bi-annual flagship an industry highlight.

event which has become

We're back in 2026, promising our biggest event yet!

Thursday, 23rd April 2026, the Civil Enforcement Association (CIVEA) returns to a Central London venue. Join us for a full day of insightful conference sessions, a vibrant exhibition, and our annual gala

Next year's theme, "A Turning Point for Enforcement," will drive discussions as we look ahead to exploring innovative solutions and future strategies in civil enforcement.

As the only dedicated event for civil enforcement agents, the CIVEA Conference has firmly established itself as a flagship event. It brings together leaders from across the enforcement industry, local government, the technology sector, civil service, and debt charities. This diverse group provides an unparalleled platform to debate critical issues, share best practices, and foster

collaborative solutions.

CIVEA is also proud to host our Industry Excellence Awards at the gala dinner. These awards are a highlight of the evening, recognising the outstanding achievements of individuals and firms within the civil enforcement sector.

We are planning an exciting programme with a host of expert speakers that will be revealed soon.

This conference is an essential event for anyone whose professional responsibilities include, or relate to, the collection of council tax, business rates, or traffic management. Don't miss out on valuable sponsorship, networking, and exhibition opportunities.

Stay tuned to Enforcement News and our social media channels for more details on booking and sponsorship opportunities or contact info@civea.co.uk.





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Instruct Us Today



Women in Revenues and Enforcement

WIRE Marks Its First Anniversary

This month, Women in Revenues and **Enforcement (WIRE)** proudly celebrates its very first anniversarya milestone that reflects the passion, commitment, and vision behind the network since its establishment in 2024. Created to foster an inclusive and supportive community for women, and advocates of women, across revenues and enforcement, WIRE has quickly grown into a recognised platform for connection. empowerment, and professional development.

The past year has been marked by exciting firsts and memorable achievements.

WIRE's journey began with its debut in-person meeting at the IRRV National Conference in October 2024. This gathering set the tone for the months ahead, transforming the idea of WIRE into a thriving network where members could come together in a spirit of collaboration and encouragement.

In spring 2025, WIRE launched its first webinar, featuring guest speaker Marvee Lee Booker. Her insights shaped the style of engaging, thought-provoking events that have since become a hallmark of the network.

WIRE's presence then extended even further through industry events, with members speaking or appearing on panels at leading conferences including LACEF in Brighton, Tel Solutions in Chelsea, the IRRV Spring Conference in Milton Keynes, and Ascendant by the Sea in Eastbourne.

Membership has steadily grown, with 192 people now part of the network.

WIRE has also formalised its charitable partnership with The Worst Girl Gang Ever, further extending its commitment to supporting women both within and beyond the sector.

Perhaps one of the most defining moments so far came in July 2025, when WIRE hosted its first in-person day. This vibrant event brought members together for inspiring talks, panel discussions, interactive workshops, and plenty of opportunities for connection and fun.

Alongside these milestones, WIRE has embraced digital growth. With a refreshed brand identity, a new website and member hub, and an active LinkedIn presence now standing at 339 followers, the network is investing in new ways to keep members informed, supported, and connected.

A recently launched mentorship programme is further strengthening that commitment, offering women at all career stages the chance to share knowledge, guidance, and encouragement.

As WIRE turns one, it celebrates more than just a year of progress—it celebrates a community of women, and supporters of women, empowering each other, shaping the sector's future, and doing so with joy and solidarity. With so much achieved in its first 12 months, the next chapter promises to be even more exciting. Whoever you are and wherever you are in your journey, WIRE welcomes you to be part of what comes next.

For further information, please visit:

www.wiregroup.org

in linkedin.com/company/wire-group-org





Newlyn plc transitions to Employee Ownership Trust

Significant milestone that underscores our commitment to long-term sustainability & independence as a leading provider of Enforcement Agent Services

- Commitment to fostering a collaborative and purpose driven work environment
- Secures our legacy of 26 years in the industry
- No change to our Management Team 8 continuity of staff
- Peace of mind knowing the Business is in good hands
- Continuation of exceptiona services to our clients

Feedback below is from one

"Thank you for sharing this fantastic news. It's clear that a great deal of thought has gone into safeguarding Newlyn's future, and the move to an Employee Ownership Trust reflects a genuine commitment to your people and long-term service delivery

I'm pleased to see the continuity of leadership and values that have always set Newlyn apart. This decision will surely secure the company's independence and strengthen its position in the sector. I also have no doubt it will be well received by both staff and clients alike. Wishing you all the very best for this exciting new chapter."



Vulnerability and Ability to Pay

Listening, consulting and developing our approach

It is fantastic to be at the stage of consulting on draft standards in the crucial areas of vulnerability and ability to pay. It was clear to me from day one that getting standards in these areas right would be one of our main challenges—but also one of the most important ones.



Chris Nichols
CEO of the ECB

We took the decision last year to launch version 1 of our standards for enforcement without vulnerability and ability to pay, recognising that we needed more time and focus to properly tackle these knotty areas. That time is now and during the early summer we led a wide range of workshops—with enforcement firms, debt advice agencies, Enforcement Agents and with people with lived experience of enforcement—to test our initial thinking and proposals on how to tackle these areas.

At the heart of our proposals on vulnerability is the idea that firms should be recognising higher levels of vulnerability and be able to show that they are responding to this throughout all stages of the process. This "safe by design" approach, through which vulnerability is not just seen as the preserve of separate welfare teams but is recognised as central to the whole enforcement process, is not designed to make it harder to do the important work

of enforcing debts. In some cases, we think it might even make enforcement more effective, allowing for enforcement to proceed safely even when someone is recognised as vulnerable.

On ability to pay, where someone can pay in full—through money, assets or a combination—then as long as it is handled in line with our wider standards, we are not seeking to get in the way of pursuit of this. However, where it is established that someone can't pay their debt in full but could over time, we want our standards to enshrine the importance of the sustainability of payment arrangements. This must surely be in everyone's benefit. Because an unsustainable arrange will either break, because it is not affordable (and everyone loses out), or not break but lead people to put their own health at risk.

Behind our high-level approach lies a lot of complexity and the workshops have been invaluable to us in hearing a wide range of perspectives and experiences of what is currently happening, where there is scope for change and improvement and where the practical and other challenges will lie in relation to our proposals. We are incredibly grateful to everyone who shared their time and contributed their views.

This feedback has all now been factored in and we are holding a full public consultation, including draft standards for comment and feedback. Look out for this consultation and please do let us know what you think. There will also be opportunities to contribute to further workshops during the consultation period.

Ultimately, we are hoping to have final standards agreed by the end of the year, with implementation to be phased through 2026.

I am really heartened by the constructive engagement we have had from industry so far and I look forward to further discussions in the coming months.



Nicola Dunn Commercial Director, AperiData

Civil enforcement today is under more scrutiny than ever before.

As local authorities, enforcement agents, and service providers strive to recover essential revenue, from council tax arrears to penalty fines, they must also navigate an increasingly complex social and regulatory landscape.

The cost-of-living crisis, combined with greater expectations around fairness and transparency, has made it clear that traditional approaches to enforcement, often reliant on outdated data and onesize-fits-all processes can inadvertently cause harm or miss opportunities for

A better way forward is emerging: Open Banking, Open Banking, is enabling civil enforcement agencies to shift from reactive recovery to proactive, datainformed engagement. And the result is better outcomes for both the individual and the organisation.

Seeing the Full Picture: **Real-Time Affordability**

The key to ethical enforcement is understanding a person's current ability to pay. Yet, this has historically been difficult to assess. Traditional credit data offers only a snapshot of the past, missing the complexity of modern financial lives, fluctuating incomes, benefits, part-time or gig work, and rising living costs.

Open Banking provides real-time insight into a person's income, spending habits, and financial commitments. With consent, enforcement firms can see whether income is regular or seasonal, spot signs of financial distress like persistent overdraft use or sudden drops in income and make decisions grounded in fact, not assumption.

This results in smarter, fairer outcomes. For those who can pay, recovery is swift and targeted. For those who cannot, enforcement agents are better equipped to offer support, adjust repayment plans, or signpost services before situations escalate.



Rethinking Collections:

How Open Banking and AperiData Are Creating Fairer Outcomes in Civil Enforcement

From Assumptions to Engagement

Civil enforcement is most effective when it's not just about enforcement, but engagement.

The Enforcement Conduct Board is consulting on new Standards for Vulnerability and Ability to Pay. Open Banking enables enforcement teams to proactively identify individuals who may need support, long before the situation becomes critical.

With Open Banking and the AperiData platform, enforcement agents gain an immediate understanding of:

- · Whether a person's income is stable, irregular, or seasonal
- Their existing financial commitments (e.g. rent, childcare, or utility bills)
- Indicators of vulnerability such as persistent overdraft usage or recent income loss

This insight not only enhances ethical decision-making but also reduces failed contact attempts, wasted visits, and unnecessary distress for all involved. It's a smarter way to prioritise cases and apply the right approach whether that's an affordable repayment plan or referral to support services.

Collaboration, Not Collection

Civil enforcement firms across the UK are now embedding Open Banking into their collections processes, not just as a technology upgrade, but as part of a broader cultural shift.

Rather than focusing solely on recovery, this approach fosters collaboration, encouraging enforcement professionals to engage with individuals in debt, understand their circumstances, and work towards sustainable solutions together.

One London borough called this shift "a cultural transformation" not just operationally, but in how they interact with residents and communities.

With earlier insight into financial distress, they reduced escalated enforcement activity and improved repayment rates, all while enhancing public trust.

This isn't about being "soft." It's about being fair, efficient, and accountable. Open Banking enables you to focus effort where it will deliver value, resolving cases quickly when someone can pay, and offering flexibility when they

Empowering Self-Service, Protecting Dignity

In many cases, individuals in debt prefer not to speak to someone directly, especially when they're anxious, embarrassed, or overwhelmed. That's why AperiData's platform supports self-service journeys, allowing individuals to securely share their financial data and receive tailored repayment options without the need for a phone call or in-person visit.

This digital-first approach respects a person's dignity and agency, while still giving enforcement bodies the insight they need to act responsibly.

Critically, it doesn't delay recovery. In fact, many clients report that recovery is faster, with fewer failed promises to pay, reduced arrears, and lower complaint volumes. As one council put it:

> We're getting better results and treating residents better. It's not a trade-off—it's just better.

A New Standard for **Civil Enforcement**

Ultimately, the future of collections in civil enforcement is one of balance, between obligation and empathy, recovery



Platforms like AperiData are helping to achieve that balance by bringing together technology, insight, and humanity. It's not about removing responsibility, it's about sharing it, together.

And in doing so, enforcement becomes not just more effective, but more ethical, compliant, and sustainable for the long term.

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Dates for the Diary

OCTOBER 2025

	1 st , 2 nd , 3 rd	IRRV Annual Conference & Exhibition in Telford www.irrv.net/annual2025
	2 nd	MALG National members meeting, virtual meeting
	2 nd	IRRV Performance Awards 2025 www.irrv.net/awards
	17 th	IRRV East Midlands Recovery Technical Day — Leicester
	23 rd	London Revenues Group Meeting
	29 th , 30 th	IRRV Golf

NOVEMBER 2025

12 th	East Midlands Gala Dinner
13 th	MALG Conference Leeds www.malg.org.uk/conference
20 th	Credit Connect Think Tank & Awards — Manchester
26 th	BPA Members Dinner

DECEMBER 2025

1 st	Northern Counties – Durham County Cricket Club IRRV Forum members only
2 nd	Yorkshire & Humberside — Guide Post Hotel Bradford IRRV Forum members only
3 rd	North Wales & North West — Wrightington Hotel Wigan IRRV Forum members only

Do you have an event coming up that you would like to see added to this list? If so, email the details to: michelle.wilson@plmr.co.uk

4 th	London Revenues Group Meeting
4 th	South Wales & South West Virtual
8 th	West Midlands — Radisson Blu Hotel Birmingham IRRV Forum members only
9 th	East Midlands — Leonardo Hotel East Midlands Airport IRRV Forum members only
10 th	East Anglia — Belstead Brook Hotel, Ipswich IRRV Forum members only
11 th	East Midlands Xmas Lunch IRRV East Midlands members only
11 th	North Thams & Southern Counties — Ambassadors Hotel London <i>IRRV Forum</i>

members only

Western Counties — Mercure Rougemont Hotel Exeter IRRV Forum members

15th

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Money Advice Liaison Group Conference 2025

Evolving Together – The Changing Landscape of Debt Policy

The Money Advice Liaison Group (MALG) Conference will return to Aspire Leeds for a second year on Thursday 13 November 2025, bringing together professionals from across the whole debt landscape to work together to improve the lives of people in debt.

The full-day event will feature unrivalled networking, industry-leading speakers including Lee Healey of IncomeMAX and Nikhal Rathi of FCA and sessions on the hottest topics.

The Changing Nature of Public Sector Debt Collection: Considering Ability to Pay

Fintech Showcase: Innovative and Cutting-Edge Solutions for Supporting Financial Resilience and Financial Capability

Financial Inclusion: Rebuilding Creditworthiness after Economic Abuse and other Financial Difficulties

MALG Friday Forum LIVE: The Future of Consumer Protection

Better Together: Artificial Intelligence and its Impact Across the Debt Landscape



For the first time this year, there will also be 'live' versions of the popular MALG Members Friday Forum and MALG Podcast with special guest Liz Barclay.

Headline sponsored by CDER Group with other sponsors and exhibitors including Dukes Bailiffs and Women in Revenues & Enforcement, plus stakeholders from across the lending, credit, advice, policy, public sector and wider sectors, the event is not-to-be-missed by CIVEA members.

Find out more and book your place at www.malg.org.uk/conference

The Need for a Sustainable Fee Structure in the Enforcement Industry

Adrian Bates Senior Business Consultant, Hambury Tilmond Limited

Reflecting on the reforms introduced in 2014, one of the MOJ's primary objectives was to "disincentivise aggressive enforcement, specifically, excessive charging and the premature or unnecessary undertaking of enforcement activities."

There was also a commitment to "fairly and adequately reward enforcement agents for their work", but despite CPI rising 31% since 2014, the fees have remained unchanged. This regression in fees raises concerns about its potential negative impact on the industry and may potentially lead to enforcement activities that the reforms aimed to eliminate!

There was much support within the industry when the then Labour Government proposed to update Enforcement regulations and establish a unified fee scale. During the formulation of the new regulation, the MOJ commissioned accountant Alex Dehayn to conduct research on the actual costs incurred at each stage of enforcement and his 2012 report provided baseline fee scales.

As an enforcement representative working with the MOJ during the formulation of the regulations, one of our main priorities was to incorporate an annual review mechanism to increase fees in line with inflation. After agreeing some compromises, this was accepted, and the MOJ issued an "Explanatory Memorandum" which stated:

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.



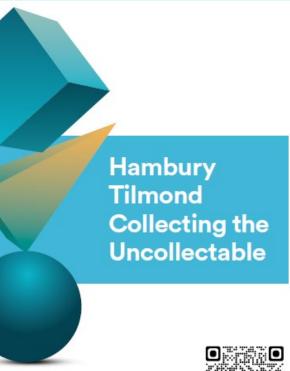
Despite this statement of intent, this "annual" CPI uplift hasn't been applied since 2014.

In 2023, the then Conservative Government did conduct a review recommending a below inflation 5% fee increase, but this was never implemented.

im In 2025, the current Government announced a further review and agreed to proceed with the 5% uplift recommended in 2023. However, the industry is still waiting for an implementation date, during which time CPI has already increased 8%.

To address this ongoing issue, significant cost reductions have been achieved by firms, with Enforcement Agent numbers decreasing by a third (replaced by cheaper office-based collection agents) and technology being introduced to aid the identification/contact of debtors without the need for physical visits. Companies are now collecting more debt for less cost, but these efficiencies can only go so far and without a real terms uplift to fees there may be a temptation for them to cut corners.

If the Government fails to act to stem this continuing regression of fees, there is a significant risk that the positive changes that have occurred since 2014 could be lost.







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HBOP and Sundry Debts

We have an audited collection rate in excess of 50%. If your HBOP and Sundry Debt is being collected as an 'added value service' it's unlikely collections are being maximised, we have the solution.

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Our agents are well trained, only work for Hambury Tilmond, and ethically renumerated, ensuring ethical collections are at the core of what we do. We are proud of our record of zero upheld complaints, and zero complaints to clients since 2018.

Challenge Us

We enjoy a challenge, on a trial basis under a simple SLA you can appoint us to challenge your incumbent enforcement provider. We have a proven track record of outperforming incumbent providers with cases they have previously returned as 'uncollectable'.

Rundles,

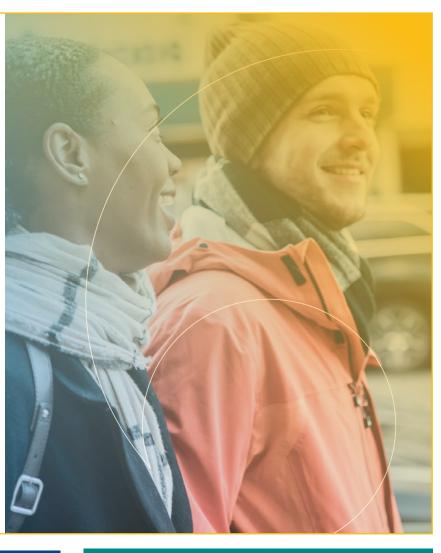
Rundles is a leading provider of ethical enforcement services that works with you to design and deliver a fairer approach to debt resolution.

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- and out of area)
- NNDR
- Road Traffic Debts/ Persistent Evaders
- 2nd Referral/Recycled Debts
- Commercial Rent Arrears (CRAR)

- High Court Enforcement
- DVLA Devolved Powers Enforcement
- Abandoned Vehicle Removal
- Removal of Travellers



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Telford International Centre, Telford, 1, 2 & 3 October

SPRING CONFERENCE & EXHIBITION 2026

Coventry Buidling Society Arena, Coventry, 12 & 13 May

SCOTTISH CONFERENCE & EXHIBITION 2026

Crowne Plaza, Glasgow, 2 & 3 September

HAVE YOU BOOKED YET?

For full details on attending our conferences as either a Delegate or Exhibitor please see details below.



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