

MONEY ADVICE TRUST

BUSINESS
DEBTLINE

NATIONAL
DEBTLINE

WISER
ADVISER

Consultation Response:

ECB Consultation on draft 2026/27 Business Plan

Response by the Money Advice Trust

Date: March 2026

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Introduction

About the Money Advice Trust

The Money Advice Trust is a charity founded in 1991. Our mission is to help prevent financial difficulty and remove problem debt from people's lives.

In 2025, our National Debtline and Business Debtline advisers provided help to 189,550 people by phone and our digital advice tool, and 53,410 people by webchat, with 2.1 million visits to our advice websites. In addition to these frontline services, our Wiseradviser service provides training to free-to-client advice organisations across the UK and in 2025 we delivered this free training to 646 organisations.

We use the intelligence and insight gained from these activities to improve the UK's money and debt environment by contributing to policy developments and public debate around these issues.

Find out more at www.moneyadvicetrust.org.

Public disclosure

Please note that we consent to public disclosure of this response.

Introductory comment

We welcome the opportunity to comment on the ECB draft business plan for 2026/27.

We welcome the progress that has been made in 2025, including the launch of the new Standards and the recent Insight report. We very much hope to see 2026 as the year that the Government enacts legislation to put in place statutory underpinning to grant the ECB additional powers to carry out its role.

We appreciate that this will mean additional business planning, outside of the current draft business plan, should this come into effect.

Responses to individual questions

Question 1: Do you have any comments on the proposed priorities for 2026/27?

We very much support the ECB's proposals for its priorities for 2026/27.

We are particularly interested in the proposal to carry out research into the demographics of people who experience enforcement action. This will be crucial to understanding whether there are certain groups that might be disproportionately impacted by enforcement action. There may be measures that need to be put in place as a result to mitigate any adverse impacts.

Question 2: Do you have views or ideas on how the ECB can seek to influence creditors towards fair enforcement, in a targeted and impactful manner?

It is clearly vital that the ECB influences creditors. However, we appreciate that this is a challenge as creditors do not come under the ECB's direct remit. As we have said in our responses to previous ECB consultations, particularly in relation to ability to pay,¹ the contractual relationships with creditors are key to enforcement agents accepting offers of payment that are affordable for our clients. We have set out some thoughts below.

- We are pleased to see the progress that the ECB has made with bringing in-house local authority collection departments into membership, and would urge the ECB to continue with these approaches.
- It would be invaluable to involve the LGA as they could take a key role in ensuring that local authorities in their creditor role are acting fairly in their contractual requirements with enforcement agents.
- For government creditors, including HMRC and DWP, interaction with the Government Debt Management Function,² including through the Fairness Group,³ will continue to be vital.
- HMCTS contracts with Approved Enforcement Agents to deal with magistrates' court fines and warrants.⁴ The ECB should liaise with HMCTS to ensure that future contracts contain requirements on time to pay and affordable repayments.

¹ Taking Control (2025) [Response to ECB consultation on vulnerability and ability to pay standards](#)

² Gov.uk [Government Debt Management Function](#)

³ The Fairness Group [Fairness Group Joint Public Statement - GOV.UK](#)

⁴ HMCTS [Certificated Enforcement Agent Register – GOV.UK](#)

- We hope that the ECB will join the voices calling on government to take action as promised to name claimants in county court claims.⁵ This will allow statistical analysis of county court claims to help identify which types of firms are taking county court action. This might help to work out the proportion of private parking firms, energy suppliers, and water or telecoms companies that are using the county court and county court enforcement agents. It would allow the ECB to target the relevant regulators, and even trade bodies to ensure that creditors in that sector are not refusing offers unnecessarily, are accepting affordable repayments and not unfairly restricting the time to pay they will allow enforcement agents to accept.
- As any of these types of debt are not generally under the Consumer Credit Act 1974, enforcement can be carried out after judgment by High Court Enforcement Agents (where the debt is over £600) this will also be an area for further scrutiny.
- The ECB could consider engaging / becoming a member of the UK Regulators Network as a way to engage regulators of other sectors, who may utilise enforcement agents – such as energy suppliers and water companies. This may provide a route to discuss how regulation of creditors in these other sectors can support the ECB’s work to ensure that a) creditors’ contractual relationships support fair enforcement outcomes and b) that creditors complete appropriate steps to assess whether it is suitable to pass someone’s debt to enforcement agents, before doing so.

Question 3: Are there any activities that you believe the ECB should be prioritising that are not contained in this plan?

Following the publication of the ECB Insight Report 2026,⁶ we would be very keen for the ECB to conduct further statistical analysis of the debt types identified in enforcement cases. We note that 64% of cases were identified as road traffic or parking. However, this is not broken down further to establish what proportion are for different type.

These cases could include:

- penalty charge notices: local authority parking penalties enforced via the county court using private enforcement firms;
- magistrates’ court fines: including driving offences for speeding, driving without insurance and so on, using private enforcement firms;
- private parking notices/tickets: leading to a county court judgment and use of county court enforcement agents.

It is also not possible to tell what proportion of cases for each type of penalty relate to individuals that clock up many repeat instances. This might impact the statistics and lead to useful intelligence about what is happening in practice.

⁵ Credit Connect (2024) [Government announces legislation to introduce claimant data on register of judgments](#)

⁶ ECB (2026) [Insight Report](#)

We think that this research would be invaluable in establishing what proportion of people are having enforcement action taken to recover relatively small sums of money for parking penalties, which escalate due to the additional enforcement charges being added. We believe this could be relevant when considering the cost effectiveness for all concerned and whether this achieves good outcomes.

- The report also identified that firms were identifying relatively small numbers of people in vulnerable circumstances. We would expect that monitoring both the numbers and outcomes for people in vulnerable circumstances will be a major priority for the ECB now the Vulnerability Standards have been published.⁷
- We also noted that the report has identified a potential discrepancy between firms that conduct or resolve more cases at the enforcement stage rather than the compliance stage. We would hope that the ECB will be analysing why this is the case, with the intention of putting special measures in place in specific firms if necessary.

Question 4: Do you have any comments on the draft budget and levy?

We do not have any specific comments on the draft budget and levy. The proposals look very reasonable and reflect the increased levels of complaints being received by the ECB.

Given that the ECB complaints function is still developing, there is potential for further additional resource being needed. We have always maintained that it is likely that people have been deterred from making complaints in the past due to complex processes and opaque access routes to escalation. Given the understandable restrictions on what date an eligible complaint could be considered from, the debt advice sector has been increasing its signposting to the ECB over the year as more cases fall into scope. In addition, now firms have been required by the ECB to put in place a simpler structure for handling complaints, there is likely to be an easier process for people to take complaints forward.

We very much support the requirement for additional capacity in the oversight team as identified by the ECB, given the number of examples of non-compliance that have been identified over the past year. We very much hope that the ECB's work will lead to improvements which mean we receive, and have to report, fewer case studies of poor practice from our National Debtline and Business Debtline clients to the ECB in future. Identifying underlying issues that can be addressed across the sector will help with this.

Question 5: Are there any other comments or observations that you would like to make?

We do not have any further comments to make at this point.

⁷ ECB (2026) [Standards on vulnerability for enforcement firms](#)

For more information on our response, please contact:

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