

3rd June 2020

The Civil Enforcement Association
PO Box 745
Wakefield
WF1 9RJ
Tel: 0844 8933922
Fax: 0844 8546322
Website: www.civea.co.uk

LETTER TO STAKEHOLDERS

Dear sir/madam

COVID19 – CIVEA POST-LOCK DOWN SUPPORT PLAN

As you are aware, the Civil Enforcement Association (CIVEA) was proactive in providing best practice guidance to its members prior to the government's COVID19 lockdown measures being introduced. On 26 March we wrote to the Ministry of Justice to confirm that all CIVEA members had suspended enforcement visits on or before that date. This suspension has been rigorously and consistently adhered to by all members without exception.

Along with many trades and services, the impact of the COVID19 crisis has been significant on the enforcement sector. CIVEA members have recorded a reduction in debt (predominately outstanding Council Tax, Commercial Rent and unpaid penalties) returned to councils and other creditors, such as HMRC, HMCTS, Transport for London, Highways England. This has resulted in a reduction in income to firms of between 70 and 90 percent. While this is catastrophic to the public purse, CIVEA members are fully aware that the suspension of enforcement visits was absolutely the correct course of action, which supports the Government's guidance on minimising the spread of the virus and providing those most impacted with the appropriate support and breathing space.

Despite these significantly challenging times I am pleased and proud to report that CIVEA members have actively sought out opportunities to support local and central Government. Enforcement firms have redirected their resources to help their local communities and charities providing services to the most vulnerable in society. Across England and Wales employed and self-employed enforcement agents have volunteered to deliver essential services such as food and medicine to the most vulnerable, utilising vehicles, fuel and IT provided and funded by our members.

CIVEA members recognise that some customers will be experiencing significant effects as a consequence of the COVID19 situation. Existing vulnerability processes are designed to take into account the case-by-case circumstances of customers and ensure they are treated fairly.

With the government now implementing plans for a phased lifting of the lockdown restrictions, I felt it an appropriate time to explain the CIVEA Post-lockdown Support Plan which all CIVEA members have committed to implement.

Post-lockdown Support Plan

COVID19 Pre-Visit Letter and Vulnerability Identification Phase

All enforcement visits were suspended by 23 March 2020 at the latest. All other activity, such as issuing of Notices of Enforcement, reminder letters and outbound calls was reduced. CIVEA members fully accept that to simply restart enforcement visits once the Government eases restrictions would not be acceptable.

Therefore, prior to recommencing any visits to customers, all CIVEA members will implement a Pre-visit Letter and Vulnerability Identification Phase. This will involve issuing a light touch reconnection letter, which uses a template based on wording provided by CIVEA (see example attached), plus follow up communication e.g. by text, email, phone where possible. Firms would use the standard form letter unless their council clients require an alteration. The letter seeks to engage with customers to understand how they have been affected by the COVID-19 crisis and respond as appropriate. Each case will be offered support as appropriate, including signposting to the Money Advice Service and debt advice charities.

Enforcement visit suspension

When enforcement can resume following the lifting of emergency regulations, individuals will be given 30 days' notice of a visit by an enforcement agent, unless the local authority has specific requirements. This is to provide sufficient opportunity for engagement with customers prior to the attendance of an Enforcement Agent, which could prevent additional fees being added to the outstanding debt

Training

All enforcement agents will be required to undertake additional, mandatory CIVEA-approved training prior to any recommencement of visits.

The newly-designed training programme will include: the effective use of protective equipment and social distancing requirements, how to protect themselves and those that they encounter in the community, This will be supplemented by refresher training on supporting the vulnerable and recognising mental health issues.

Pre-visit Assessment

Where a telephone number has been sourced and if appropriate to do so, CIVEA members will make outbound calls in advance of enforcement visits to identify any vulnerabilities or changes in circumstances.

Post-lockdown visits

Enforcement visits will restart after the government lockdown restrictions that cover such activity are lifted.

- Agents will receive refresher training on how to identify any vulnerabilities or changes in circumstances.
- Visits will be contactless in line with CIVEA safe working practices guidance
- Enforcement agents will not enter premises to take control of goods
- Where appropriate vulnerable people or those who have been severely impacted financially by the pandemic, e.g. loss of job, Statutory Sick Pay, will be referred to debt advice agencies for additional support.
- In these circumstances, the case will be placed on hold to be monitored, with contact by welfare staff, as appropriate, prior to proceeding. The fees incurred will remain in place.
- Vulnerable people will be referred to their creditor for additional support, where appropriate.

Data collection and recording

All CIVEA members will collect and record details of customer vulnerabilities, in line with data protection requirements e.g. customer consent, and develop support plans that reflect CIVEA's guidance on assessing the impact of COVID-19 on households.

Provision of protective equipment

The majority of enforcement payments are made by telephone before an enforcement agent is required to visit or after a letter has been left. When visits are necessary, CIVEA will work with members to source sufficient workwear and hygiene supplies to protect and reassure staff and members of the public. Enforcement agents will practice social distancing, comply with enhanced hygiene techniques (including disinfecting their kit) and be issued with hand sanitizer. This is in full compliance with the Government and Public Health England advice.

The CIVEA Council and I are confident that the measures included in the Post-lockdown Support Plan are a sensible and proactive response to an exceptional situation. Enforcement of public debt continues to be an essential service to recover outstanding taxes and fines, which contributes to funding critical services and deters potential defaulters.

I hope that you will agree that this is a responsible response to achieve the balance the public sector must strike between collecting debts in the name of fairness for the taxpayer, while recognising the vulnerability of some of individuals and families affected financially, socially and healthwise by the COVID-19 pandemic.

Finally, this Plan is based on current conditions, which continues to evolve. As we do not yet have an indication of the government's exit plan in this area, we reserve the right to amend our policy if the

regulations are amended.

Yours sincerely,



Russell Hamblin-Boone
Chief Executive Officer

CIVEA
Civil Enforcement
Association