



# The Doorstep Vulnerability Toolkit

Raising professional standards  
for the benefit of everyone



# Contents

Why did we create this toolkit?	<b>3</b>
How did we create this toolkit?	<b>4</b>
The highest priority	<b>4</b>
The SEVENS Protocol	<b>5</b>
The FRIEND Protocol	<b>8</b>
Just Breathe	<b>9</b>

# Why did we create this toolkit?

**We believe that debt owners deserve to be paid, but not at any cost to those who owe the debt.**

An **ethical approach** is not only paramount to the safety of those against whom we enforce warrants, but also to the brands we work with, be they our panel, our clients or our partners.

The fearmongering driven by biased and uninformed media alongside the rise of docusoaps within our industry do little to **foster trust with the public**. This needs to stop. Now.

Why should enforcement be any different to the rest of the debt industry when it comes to customer service? There is no reason at all why an enforcement visit cannot also be an **excellent customer journey**.

With that in mind, we are proud to present our Doorstep Vulnerability Toolkit, comprising:

**The SEVENS protocol** used to determine whether to continue with the enforcement visit, or withdraw if it is unsuitable

**The FRIEND protocol\*** used to help identify whether there is an element of illegal money lending

\*The FRIEND protocol was created by the Centre for Social Justice (CSJ) and aimed at the debt advice sector. We have adapted it to make it better suited to a doorstep visit.



# How did we create this toolkit?

## 1 We looked at great, pre-existing protocols within the industry

The debt industry in the UK already has some fantastic conversational protocols e.g. TEXAS. These work well in a contact centre environment, but not so well in a face-to-face situation, where the conversation can be guided by other factors.

## 2 We created our own protocol, designed specifically for face-to-face visits

None of the existing tools take account of the rich, sensory information that is available in a face-to-face environment. Our new protocol, SEVENS, is designed to do just that. We have also adapted the CSJ's FRIEND protocol for use on the doorstep.

## 3 We sought advice from experts and peers

We appreciate our partners across the industry who helped us to finetune this protocol and ensure that it is fit for purpose for enforcement agents, customers, clients and their brands.

# The highest priority

**At the Compliance Stage, our first priority is to prevent a visit.**

## Data and analytics

We always use a range of data sources from several suppliers to ensure that we have full, and broad, coverage of consumer data.

We can use this data to identify and remove those cases that are not suitable for an enforcement visit, such as those with no propensity to pay.

## Industry protocols

We use protocols like TEXAS, IDEA, BLAKE, BRUCE and CARERS to understand what's going on in a customer's life.

This can help us signpost people to appropriate support services, which builds trust and rapport with the customer, improves the agent's wellbeing and protects the client's brand.

## But sometimes...

Data is a coarse filter that complements the fine filter of an agent on the phone. There will always be cases where the data is inconclusive and contact attempts are unsuccessful. This could be for lots of reasons, including wilful non-payment.

**As such, there will always be a place for a doorstep visit.**

# The SEVENS Protocol

## How does it work?

SEVENS is not about abandoning a high volume of visits, it is about satisfying yourself that a vulnerable customer hasn't slipped through. The idea is to gather vulnerability data that will determine whether to continue with the visit, or withdraw if it is unsuitable. This is done by assessing seven key areas:



# The SEVENS Protocol

## How does it work?

### 1 Safety

#### Are you safe?

Constantly risk assess the scene for threats, which could be from people in the property, people outside, neighbours watching from windows, or other people who may arrive during the visit.

#### Is the customer safe?

Consider the emotional, physical and mental state of the customer and any other people at the property.

#### Is the environment safe?

Do you have a clear exit if necessary? Is the ground solid and even? Are there leaks, damp or mould that may be putting the customer at risk? Are there unattended pots on the cooker when you arrive?

### 2 Sight

#### What clues can you see?

Are they nervous? Are they constantly looking at the door, the phone or to another room in the house?

Do they have any visible injuries, bruising, or appear to be in pain? How about walking aids or wheelchairs?

While scanning the property for goods, what sort of state are things in?

Is there medication lying around, or evidence of alcohol / substance abuse?

Is there anything to suggest young children live at the address?

Are other demand letters visible, suggesting problem debt?

Is there evidence of a recent bereavement e.g. a funeral service order or With Deepest Sympathy cards?

### 3 Sound

#### What clues can you hear?

How does the customer sound? Does their tone of voice give anything away? Is their speech slurred?

Is anybody else in the house? Is there any shouting? Are there children playing, or a person being cared for by the customer?

If the customer takes a call during the visit, can you overhear any threats or shouting from the person calling the customer? Does their demeanour change after the call (or a message)?

Is there anything to suggest that basics are not being looked after? A smoke alarm / CO2 detector dead battery warning beep?

Is there evidence of anti-social behaviour nearby e.g. neighbours playing excessively loud music?

### 4 Smell

#### What clues can you smell?

Does the property or the customer smell of alcohol or cannabis?

Does the customer's smell indicate poor personal hygiene? This can be a sign of a mental health issue, modern slavery or domestic coercive control.

Does the smell of the property give rise to concerns that the customer is unable to manage the basics e.g. blocked toilets, drains, overflowing household waste, unclean pet enclosures?

Does the property smell damp (musty)?

Is there any smell related to rodent infestation (musky, ammonia)?

Is there any other smell that is out of the ordinary e.g., wheelchair users and bedridden people can suffer with pressure sores, which smell rancid or putrid if infected?

# The SEVENS Protocol

## How does it work?

### 5 Senses

#### What are your experience and gut instinct telling you?

What clues can you sense? This is about gut instinct and will vary depending on life experience, training and natural tendency for spotting things that aren't self-evident.

Everything else we have looked at so far is data.

Process that data, combine it, what does your instinct tell you?

For example, if you saw other debt letters, and a 'friend' is present during the visit, with the customer frequently looking at them and seeming detached from the conversation with you, this could be an indication of illegal money lending or coercive control.

There is no way to summarise this, but it will help with the next section.

### 6 Score

#### Should you walk away?

So, you've assessed those five areas, but what should you do next?

We could give you a scoring mechanism to quantify the outcome, but the truth of the matter is, you already know whether you should walk away or not.

If an agent is determined to proceed with a visit that should probably not go ahead, then any scoring mechanism could be gamed and would not be effective anyway.

On top of this, constraining the best judgement (of an agent) could lead to agents blindly following the scoring mechanism out of frustration, which would lead to poor outcomes.

The key factor is how agents are incentivised to act, through thoughtful policy decisions that balance the needs of customer and client.

### 7 Solution

#### Which is the optimal treatment path?

Solutions should be based on an assessment of all the available data. This list is illustrative, not exhaustive.

- Payment In Full
- Affordable Repayment Plan
- Promise To Pay
- Controlled Goods Agreement
- Removal of Goods
- Signposting
- Informal Breathing Space
- Assistance Needed Immediately (Ask for ANI)
- Withdrawal: Not Appropriate For Enforcement
- Withdrawal: Other



# The FRIEND Protocol How does it work?

The Centre for Social Justice (CSJ) estimates that over a million people in the UK could be borrowing from an illegal money lender. It recently published the FRIEND protocol as a framework for debt advisers to discuss illegal money lending with the customers. Just has slightly adapted this protocol for use in a face-to-face visit in the home.

F

## Friend

Does the customer disclose they have borrowed money from a friend? Are they really a friend? What happens if they don't pay?

R

## Repeat

Does the customer know if their friend lends money to other people? Has the customer borrowed from them before?

I

## Interest

Does their friend charge interest or other charges? Are these clear and are they adhered to, or are they vague or changeable?

E

## Evidence

Does the customer have any evidence of the loan (any paperwork, text messages, voicemails)?

N

## Nervous

Is the customer nervous when talking about their friend? Is the friend present? What is the dynamic between them?

D

## Disruptive

Does the friend appear to be a disruptive figure in the customer's life? Do they represent a danger to the customer?



# Our toolkit is part of something bigger... Introducing Just Breathe

## Assess viability of visit

Use the enforcement vulnerability toolkit (SEVENS and Friend protocols) to determine whether or not to proceed with the visit.



## Proceed with visit

Complete the enforcement visit as planned, if it is deemed suitable, and agent collects relevant fees.

## Employ Just Breathe

If it is deemed unsuitable, the agent should withdraw and employ Just Breathe



## How does it work?

If an enforcement visit is deemed unsuitable based on an agent's use of the toolkit protocols, they can employ Just Breathe to ensure the best outcomes for both themselves and the customer. This unique service offering within the enforcement market comprises three elements:

### Enhanced signposting

Removing payment barriers and giving people the support they need not only increases trust in your brand and builds rapport with the customer, it makes payment more likely. If the agent thinks the customer needs support to get over a barrier to payment, then they can refer the customer to a specialist support service.

### Breathing Space

The Credit Services Association Code of Practice included a Breathing Space long before the government designed a formal version; it's just good practice. If the agent thinks the customer needs support to get over a barrier to payment, then they may ask us to put in place an informal breathing space.

### Standards and oversight

We have an enhanced body worn video (BWV) process and full cloud access to all BWV footage across our supply chain. We reconcile visit numbers against video file numbers to proactively identify non-compliance. This promotes the Hawthorne Effect (you change behaviour by all parties knowing that non-compliance will be discovered).

# Just Breathe

## Enhanced signposting

### For the customer

There are times when the events going on in a person's life are a barrier to clearing the debt. We can either run headlong at those barriers and hope to smash through them (which is not a good experience for either the customer or the agent), or we can help the customer get the help that they need as a priority.

### For the agent

No one person can deal with the variety of issues that a customer may present with. Constant exposure to people in distress, coupled with an inability to help, takes its toll. Being able to provide specialist support allows the agent to walk away knowing they've done the right thing. This is good for the agent's wellbeing and resilience.

### For the client

This approach is not only ethical, it is rooted in behavioural science – namely the concept of reciprocity; By 'giving' the customer something, we build rapport and a desire to engage, which gives you the best chance of getting paid while protecting your brand. This is a Win-Win-Win approach that is fair to all parties.

## Breathing Space

**It would be immoral and inefficient to offer enhanced signposting without also giving people time to explore that option.**

### Best practice

Given that Breathing Spaces already exist in legislation, and in the collections industry Code of Practice, we won't wait to be told to do the right thing. **We Just Do It.**

This sends a clear message to our customers and clients alike: we resolve problem debt.

### Debt Respite Scheme

The customer can access a formal Breathing Space through the Debt Respite Scheme, which applies for a minimum of 60 days.

Giving people a chance to get things sorted – things that the agent can see are real barriers – without jumping through the legislative hoops is expedient.

### Behavioural insights

This also plays to behavioural insights indicators: messenger, reciprocity and ego.

Harsh tactics cause people to dislike the messenger, retaliate in kind, in a way that makes them feel better about themselves. Playing to their better nature first makes those three elements work in our favour, instead of against us.

## Standards and oversight

**Transparency is the key to ensuring good practice. Knowing that non-compliance is discoverable promotes compliance.**

### Body Worn Video (BWV)

We have a standard opening script that is completed on camera before the agent gets to the property. The camera must then remain on until the agent is back in the car and completes the closing script. Filming may not be paused at any time.

### Audit / oversight process

We provide:

- Full cloud access to all BWV footage and random sample selection for end-to-end review of footage
- Reconciliation of visit numbers against video file numbers
- Appropriate governance with suppliers for review of findings, KPI adherence, and escalation if required



# It's **Just.** to do it right

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Contact us to find out  
more about implementing  
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Toolkit or Just Breathe

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