



## Customer Care Policy

**LWE operates the following policy.**

### Terminology

**LWE is the trading name of London Warrant Enforcement Ltd** (The company) registered at Companies House under registration no. 4388195, our registered office is at 20-22 Wenlock Road, London N1 7GU, our VAT registration no. is 795 5075 86. Our D-U-N-S® Number is 424005242.

**Creditor:** this includes - a local authority, major or frequent judgment creditors in the civil courts, Government Departments and HM Courts and Tribunals Service to whom financial penalties are paid, and landlords undertaking the commercial rent arrears recovery (CRAR) process.

**Debtor:** a person who owes a sum of money - this may be a judgment debt or a criminal financial penalty fine which is in default or a liability order. The term “debtor” where appropriate and applicable, also covers individuals who are being wrongly pursued for a debt in respect of which they are not the actual debtor.

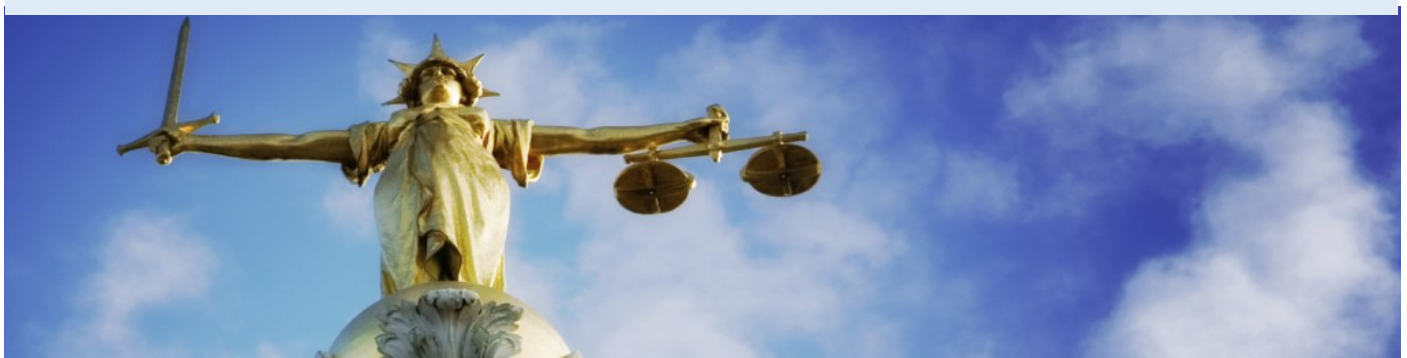
**Controlled Goods:** Taking control of goods is the procedure under a writ or warrant of control to secure the goods of a debtor. This involves taking an inventory of the goods and where necessary having a controlled goods agreement relating to the use of those goods signed by the debtor.

### Complaints

At LWE, we take pride in maintaining an exceptionally low number of complaints. However, we understand that mistakes can happen from time to time, and when they do, we are committed to correcting them as swiftly as possible. We view each mistake as an opportunity to learn and ensure it doesn't happen again.

Your feedback, whether positive or negative, is vital to help us continually improve the service we provide. If you do have a reason to complain, please rest assured that it will be handled fairly, professionally, and without any bias or discrimination.

Please see our Complaint Procedure document for more information.



## **Communications**

**By e-mail** to a generic e-mail address, individual employees and departments are assigned specific e-mail addresses but in general members of the public can contact the company using [enquiries@lw-e.co.uk](mailto:enquiries@lw-e.co.uk) where incoming traffic is checked regularly and usually responded to on receipt or at the latest the next working day. All field agents have devices that support company e-mail facilities.

**By Post** to London Warrant Enforcement Ltd, 20-22 Wenlock Road, London N1 7GU. All correspondence is opened and scanned onto the system on the date of receipt. Enquiries are made and if possible, an immediate reply is made. ***This is also the company's registered office for the service of legal documents. We do not accept the service of documents by email.***

**By telephone** on (+44) 800 086 9089. This is a free to call number from UK landlines and mobile phones. All calls are answered by friendly and approachable staff members who although firm will be fair when answering a query and are always referred to their case worker where appropriate. Various checks are made to ensure we do not discuss particular cases with the wrong person. Calls are taken between 9.00am and 5.00pm Monday to Friday. Enforcement agents are usually contactable throughout the day, including weekends. Voicemail options are available where calls are usually responded to within the hour. If a caller calls within the UK and asks to be called back. We will do this at our expense.

**Facsimile** correspondence or documents can be sent to our London office on (+44) 207 788 3460.

### **LWE Customer Standards**

All telephone calls are targeted to be answered within five rings, sometimes during busy periods this may increase but we will let you know this and give you the opportunity to leave a message, the average waiting time is just 77 seconds. If a call cannot be taken, then we will call back at our expense. All correspondence is dealt with within 1 to 5 working days. E-mails and faxes are usually dealt with within one working day. We target to close a complaint within seven working days.

## **Payments**

We have a national agreement with Barclays Bank plc where payments can be made by way of BACS, CHAPS, Standing Order or Internet Banking. Payments credited to our account after 3.30pm on a banking day will show as a next banking day payment. E.g., If a payment is made at 6pm on a Friday it will show in our account on Monday unless it is a Bank Holiday. Our officers are discouraged to collect cash but where no other option is available will only be accepted in conjunction with our health and safety policy. Cheques and Postal Orders are discouraged.

### **Credit and Debit Card Payments**

#### **Security Information**

We partner with [EComm Merchant Solutions](#) to process card payments. Online payments take place within a secure payment system. All card information supplied to London Warrant Enforcement is encrypted using Transport Layer Security technology (TLS) and shared only with our card payment processor at the time of the transaction. LWE does not store any sensitive payment card information but does retain personal information about the payment you are about to make to ensure each payment can be identified and credited to the correct account. Further information can be found in our [Privacy Policy](#).

## **LWE is Payment Card Industry Compliant (PCI)**

Payment card industry (PCI) compliance is adherence to a set of security standards that were developed to protect card information during and after a financial transaction. LWE uses SecurityMetrics to be PCI compliant. SecurityMetrics has found us to be compliant with the Payment Card Industry Data Security Standards (PCI DSS), endorsed by Visa, MasterCard, American Express, Discover, and JCB card brands. They recognise our efforts to reduce credit card theft and fraud. By achieving PCI certification, we are maintaining rigorous data security standards to ensure that our customer's credit card information remains safe and secure. To maintain PCI DSS compliance our self assessment questionnaire must be passed every 12 months and vulnerability scans passed every 3 months.

## **Pay by Bank**

LWE partners with [ecospend](#) as a third-party provider for Pay by Bank, they are licensed by the [Financial Conduct Authority](#). You can use Pay by bank to safely transfer money to our bank account from your mobile banking application.

## **Data Protection Act**

LWE is registered with the Information Commissioners Office, registration no. Z8501150. We observe confidentiality of information in our possession and are aware of the dangers of disclosing information to third parties. Data protection relates to the personal data of an individual - it does not relate to a company.

## **Our Data Protection Principles are**

- personal data is processed fairly & lawfully.
- is obtained for a lawful purpose only.
- is adequate, relevant and not excessive.
- is accurate and updated where necessary. and be kept for no longer than is necessary for the purpose it is obtained.

By its nature, all data held is confidential and is respected as such. We understand disclosing confidential information to a third party unconnected with the purpose the data was obtained is in breach of the DPA 1998 S55 and renders LWE liable to prosecution. Individuals or companies may make a 'Subject Access Request' to us which they believe may hold their personal data and gain a copy of that data.

# CUSTOMER CARE CHARTER

At LWE we recognize that we have to offer two forms of customer care.

- The debtor who we are collecting from is also a customer and
- The creditor to whom we are collecting for.

## **Everyone can expect**

To have their confidentiality and privacy respected. To be treated honestly, fairly and equally regardless of their sex, sexual orientation, marital status, race, colour, nationality, ethnic or national origin, religion, age, disability or union membership status. Courtesy and helpfulness when they contact us. To be listened to and honestly replied to. Our letters and paperwork to be clear and easy to understand, all notices have accompanying explanation notes. A clear point of contact at LWE who the customer may contact easily.

## **We are committed to**

Be easily contactable by telephone, e-mail and fax. Working within existing legislation and to the [National Standards for Enforcement Agents 2014](#).

- **Striving to continually improve our service to both creditor and debtor.**
- **Monitor and review our recovery procedures to ensure that they are compatible with the highest ethical standards.**
- **Train staff and keep them up to date with changes in legislation.**
- **Working closely with our customers and providing a service that you only get from a small, dedicated company.**
- **Treating everybody fairly and with respect to which they are entitled.**

## **Vulnerability**

Enforcement agents/agencies and creditors must recognise that they each have a role in ensuring that the vulnerable and socially excluded are protected and that the recovery process includes procedures agreed between the agent/agency and creditor about how such situations should be dealt with. The appropriate use of discretion is essential in every case and no amount of guidance could cover every situation.

When a creditor issues a case we assume that they have conducted their own due diligence checks and are not aware of a vulnerability severe enough to omit a case from their recovery process. Therefore, we have a duty to investigate and liaise with the creditor and report the circumstances in situations where there is evidence of a potential cause for concern. A decision can then be reached on the best way forward for all concerned.

LWE partners with [The Vulnerability Registration Service \(VRS\)](#), who offer lots of help for people in vulnerable situations whether temporary or permanent.

## **So, what is vulnerability-**

### **Illness**

Any serious health issue such as cancer or a heart attack can have a huge impact on your life – and your ability to work and maintain a stable financial situation. Many people find themselves financially vulnerable in these circumstances and by registering with the VRS, they can let companies know what's going on.

### **Physical Disability**

People with physical disabilities can find their earning potential is limited. On top of this, there are often higher costs to consider such as specialised equipment and care.

The VRS can be a good option for anyone with a physical disability.

### **Mental Health**

There are numerous links between mental health issues and debt. Mental health conditions such as bipolar can often lead to irrational behaviour and over-spending. If you're worried that your mental health could cause you to get into un-manageable debt (or if it already has), then the VRS can help you to protect yourself from this.

### **Cognitive Disorder**

Conditions such as dementia, autism or down syndrome make it incredibly difficult (or in some cases, impossible) for sufferers to manage their finances without support. In these instances, the individual (or someone who has legal responsibility for them) can register with the VRS to ensure that companies are aware of their circumstances and treat them accordingly.

### **Life Event**

Vulnerability can often be caused by our life circumstances at a given time. Life events such as the death of a loved one, divorce or addiction can suddenly throw our finances into turmoil. Rather than struggling through, registering with the VRS can give you some peace of mind and let companies know what's going on until you're in a better place.

### **Financial Circumstances**

An individual's financial circumstances are a very common cause of vulnerability. If you are living on a very low income, you're relying on benefits and/or you have high levels of debt, then that puts you in a vulnerable situation and by registering with the VRS, you can help to protect yourself from further debt and let companies know that you're struggling right now.

### **Financial Capability**

Lastly, financial management can be extremely difficult for some people, for example the very young, the elderly, someone who has poor literacy and numeracy and people for whom English isn't their first language. In these examples, the VRS can provide some protection against unmanageable debt and offer a way for you to let companies know your situation.

## **Staff training and recognising vulnerability**

Recognising and supporting vulnerable customers is essential. Proper staff training ensures employees can identify and assist individuals facing financial, emotional, or physical difficulties. Our staff are trained to-

- Identify signs of distress or difficulty in customers (e.g., confusion, anxiety, communication struggles).
- Actively listen and respond with empathy.
- Ask appropriate questions to understand the customer's situation.
- Follow company procedures for supporting vulnerable individuals.

## **Practical Steps for Supporting Vulnerable Customers**

- Use clear, simple language to avoid confusion.
- Offer alternative communication methods (e.g., email, letter, a trusted representative).
- Be flexible with policies (e.g., adjusting payment plans).
- Direct customers to specialist support services (e.g., financial advisors, charities, mental health services).

## **Embedding a Culture of Support**

- Regular staff training sessions on vulnerability awareness.
- Clear internal policies and procedures for handling vulnerable customers.
- Appointing Vulnerability Champions in teams to provide guidance.

**Encouraging a compassionate and patient approach in all customer interactions.**

## **Recovery of fees from vulnerable debtors**

[Regulation 12 of The Taking Control of Goods \(Fees\) Regulations 2014](#) states where the debtor is a vulnerable person, the fee or fees due for the enforcement and any disbursements related to that stage are not recoverable unless the enforcement agent has, before proceeding to remove goods which have been taken into control, given the debtor an adequate opportunity to get assistance and advice in relation to the exercise of the enforcement power.



## Recovery of Fees for Enforcement Related Services

### Can You Avoid Bailiff Fees by Paying the Creditor Directly?

In most cases, no—enforcement fees cannot be avoided simply by paying the original creditor directly. Once a debt has been passed to enforcement agents, their fees become legally due.

It is the policy of LWE to recover from the debtor any fees due to us under current legislation should a debtor make payment to the creditor direct to specifically avoid paying our fees.

[Regulation 4 \(3\) of The Taking Control of Goods \(Fees\) Regulations 2014](#) states The enforcement agent may recover under this regulation the whole fee provided in the Schedule for a stage where the amount outstanding is paid after the commencement, but before the completion, of that stage.

### Bailiff Fees When Paying the Creditor Direct

One of the most common questions regarding enforcement action is whether paying the original creditor (such as the Council for council tax arrears or the Magistrates' Court for court fines) can help avoid enforcement fees. This explains the key points:

**If you pay the creditor directly without paying our fees after we have been instructed** we will seek to recover our fees. Once a warrant or liability order has been passed to us the compliance, enforcement and sales fees become part of the overall debt and accordingly, if payment is made to the creditor of just the principal debt minus the enforcement fees, then this is merely a part payment and enforcement can legally continue to recover the balance.

### How much are enforcement fees

**The Compliance Fee of £75** is the first charge added when a debt is referred to an enforcement agency. This fee applies as soon as the local authority passes the debt for recovery which begins when the enforcement company sends a Notice of Enforcement to the debtor. The debtor is given at least 7 clear days to arrange payment before further action (e.g., an enforcement visit). This fee cannot be avoided once the case has been sent to enforcement, even if you pay the original creditor directly.

**Enforcement Fee of at least £235** if the debt is not paid or a payment arrangement is not made during the Compliance Stage, the case moves to the Enforcement Stage, where additional fees apply. This fee is added when an enforcement agent first visits a debtor's property and applies even if you are not at home or do not open the door. If a debt exceeds £1,500 a further 7.5% is charged above the standard fee of £235.

**Sales Fee of at least £110** If a debtor fails to settle their debt after an enforcement agent visits, it applies when goods are physically removed to be sold at auction. If a debt exceeds £1,500 a further 7.5% is charged above the standard fee of £110. There may be extra costs for storage and auction fees, which could further reduce the amount of money recovered from selling seized goods.

Fee Stage	Fixed Fee	<u>Plus</u> Percentage fee (regulation 7): percentage of sum to be recovered on amounts due exceeding £1500
Compliance stage	£75.00	0%
Enforcement stage	£235.00	7.5%
Sale or disposal stage	£110.00	7.5%