

## BACKGROUND

In June 2014, Court Enforcement Services began trading. The company was formed by a group of experienced civil enforcement and debt collection professionals. Several have been pioneers in the processes now used in court enforcement which have led to new legislation (Tribunals Courts and Enforcement Act 2007, that came into effect April 2014) and other benchmarks which have become the norm. One of the objectives of Court Enforcement Services was to bring a fresh new approach to the areas of High Court Enforcements and Commercial Rent Arrears Recovery (CRAR).



Within just 6 months, the organisation was already employing 10 senior court enforcement professionals and over 50 enforcement agents, and remarkably had already achieved certification to both ISO 9001 (International Quality Management Standard) and ISO 27001:2013 (the recently revised International Information Security Management Standard). This case study focuses on why the Standards were adopted and, more significantly, how Court Enforcement Services managed to achieve certification in such a remarkably short time frame.

## BUSINESS DRIVERS

### Reassuring Clients and Winning Business

As a new start-up organisation operating in a heavily regulated industry sector, Court Enforcement Services was conscious of the need to demonstrate to its clients that it had an effective and integrated management system in place and that quality of service delivery and information security were central to everything it did. As Frank Millerick, Joint Managing Director at Court Enforcement Services explains “By certifying to ISO 9001 and ISO 27001, we were able to reassure clients that we had robust systems and processes in place and could be trusted to protect any information that was shared with us. All of the Directors at Court Enforcement Services have considerable previous experience of the Standards and we were aware that gaining certification would provide the greatest reassurance to both external and internal stakeholders.”

When founded, a central ethos of Court Enforcement Services concerned the need for simplicity and transparency. Thus, having its internal policies, processes and working practices scrutinised and assessed by an external body fitted perfectly into that culture.

### Meeting Pre-qualification Criteria on Tenders and Questionnaires

In order to effectively tender or quote for work in many large public sector/utility organisations, it is essential to have a number of accreditations in place. Court Enforcement Services was acutely aware of this requirement, particularly when needing to complete pre-qualification questionnaires and where certifications such as ISO 9001 and ISO 27001 negate the need to answer significantly more questions.

### Deriving Internal Benefits

From their previous business ventures, the Directors of Court Enforcement Services were aware of the internal benefits that ISO 9001 and ISO 27001 would bring. By implementing robust ‘best practice’ with pragmatic and lean management systems, including policies and processes from day one, Court Enforcement Services would benefit from efficiencies and minimise any customer complaints or issues.

## KEY ACTIVITIES UNDERTAKEN

### Deciding on Certification Scope

As a start-up organisation, it naturally made sense to include the whole organisation within scope. However, by outsourcing certain operations (notably IT infrastructure) to ISO 27001 and ISO 9001 certified suppliers, it was able to exclude certain activities and controls from the certification assessment.

### Conducting a Risk Assessment



Russ Poulter, Director at Court Enforcement Services

Russ Poulter, Director at Court Enforcement Services and responsible for implementing ISO 9001 and ISO 27001, was fully aware of the pivotal importance of the information risk assessment process with regard to implementing an information security management system. Based on his previous experiences, he made the decision to adopt Abriska, a purpose designed risk management tool from URM. With Abriska, Court Enforcement Services was able to follow a 4 step process which enabled the organisation to analyse and evaluate risks to information and information processing assets. As Russ Poulter explains “Within the 4 step process, we were able to assess the maturity of information security controls implemented within the organisation against the 2013 version of ISO 27001. The end result, having completed the risk assessment, was a risk register and prioritised risk treatment plan, enabling the Senior Management Team to spend time and resource implementing controls where we believed they were most urgently required. Once controls had been implemented, this improvement in control maturity could be easily demonstrated in Abriska and communicated to both our customers and our certification body.”

### Developing Appropriate Policies and Processes

Having conducted the risk assessment using Abriska, Court Enforcement Services implemented a series of measures, policies and processes which were deemed to be most appropriate and relevant to the organisation. Key measures included the implementation of:

- Acceptable Use Policy (Paramount for a new organisation to set clear guidelines to employees on acceptable behaviour and help reinforce the company culture)
- Information Security Awareness Programme (Whilst the majority of staff recruited at the time of the company inception were well grounded in quality and information security good practice, it was important for Court Enforcement Services to build information security awareness into the induction programme for new starters)
- Information Classification Scheme (Providing customers with visible reassurance that sensitive information is classified and treated with particular care)
- Document Management System (Court Enforcement Services adopted MS SharePoint as a central repository for all key working documents, reassuring internal users they were accessing latest versions of documents etc.)
- Clear Desk Policy (From day one, Court Enforcement Services made a conscious decision to minimise the amount of paper documentation within the office)
- Encryption and Password Protection (Given the sensitivity of customer data, Court Enforcement Services introduced encryption and a robust password policy).

## ■ HOW CERTIFICATION WAS ACHIEVED IN SUCH A TIGHT TIMESCALE

### Gaining Senior Management Commitment

Having had previous experience of management system standards, Senior Directors at Court Enforcement Services were already fully aware of the external and internal benefits that would be derived from certifying to ISO 9001 and ISO 27001. As a result, the implementation project was always seen as a top priority. In addition, the fact that senior managers attributed such importance to information security and robust working practices meant that the rest of the staff were more likely to follow suit.

Furthermore, having a director and experienced management system professional, in the form of Russ Poulter, responsible for driving the certification project was key. Russ ensured momentum was maintained and that certain activities (e.g. management review and auditing activities) were carried out at the earliest time in order to show sufficient maturity at the Stage One and Stage Two external certification body assessment.

### Embedding Culture from Day One

As a new operation, Court Enforcement Services was able to embed a strong management system culture with robust and consistent working practices from day one. As Russ Poulter comments “Due to our collective previous experiences with the Standards, we were able to parachute in proven systems and practices with a team that was aware of the need for systematic and reliable working practices. We made sure that all the lessons learned from previous business ventures were maximised in creating a disciplined work environment from the outset.”

### Ensuring Appropriateness of Solutions

One of the key mantras attached to Court Enforcement Services’ ISO 9001 and ISO 27001 implementations was ‘Keep it simple’ and ensure any controls implemented were commensurate with the size of the business and also reflected the experience and skills of its staff. It was not necessary, for example, to develop detailed documented work procedures. Instead, great use was made of high level flowcharts which provided experienced staff with all the key steps to follow, but gave them flexibility to adopt their own individual approaches. As Russ Poulter commented “We never lost sight of the need to make the Standards work for us and not the other way round.”

### Partnering with Risk Management Specialist

Russ Poulter and Court Enforcement Services identified they could gain considerable benefit from working with risk management specialists URM. By adopting Abriska, URM’s risk management tool, Court Enforcement Services was able to save substantial time, as well as simplify the risk assessment process. Russ Poulter comments “As Abriska comes preconfigured with linked asset types, threats and the latest ISO 27001:2013 controls, the time saving in the set up phase were considerable. In addition to the significant time savings, I really liked the flexibility of Abriska in being able to set and change our risk appetite, as well as being able to quickly demonstrate changes in control maturity. From a certification perspective, Abriska also produces all the necessary outputs that the certification body will expect to see, including risk score matrix, risk treatment plan, statement of applicability and risk register.”

### Maximising Use of Technology and Tools

Court Enforcement Services made a conscious decision when forming to automate as much of the back office functions as possible. The IT infrastructure is predominantly Cloud-based, with the infrastructure provider being ISO 27001 certified. In order to provide additional resilience, a portable encrypted hard drive is also used to back up critical and sensitive data. Another conscious decision was to automate the document management system and MS SharePoint is used to share key policies and processes, ensuring that staff are always using the latest versions of documents.

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*In addition to the significant time savings, I really liked the flexibility of Abriska*”

Russ Poulter

## ■ BENEFITS DERIVED

Russ Poulter is unequivocal in his belief that whilst gaining ISO 9001 and ISO 27001 certification represented a significant commitment and investment for a newly formed company, the benefits were seen right from the start. "It wasn't a case of waiting to receive the ISO 9001 and ISO 27001 certificates, the journey itself was valuable in its own right and resulted in a number of positive outcomes."

### Winning New Business

One of the most tangible ways in which the investment required to achieving ISO 9001 and ISO 27001 certification can be justified is in winning new business. Russ Poulter comments that "Acquiring certification to ISO 27001 and ISO 9001, and even just the process of progressing to external assessment, enabled Court Enforcement Services to bid for business that wouldn't have been possible without them. Certification to the two management system standards has undoubtedly opened doors for us."

### Reassuring Customers

As a newly formed company, it was essential for Court Enforcement Services to quickly establish its credentials. "Achieving dual certification" explains Russ Poulter "did exactly that. We were able to clearly demonstrate to some significant organisations that we were totally committed to providing services in a secure, consistent and systematic manner. It also demonstrated our commitment to continuous improvement and to transparency of operations."

The fact we have a highly respected and UKAS registered certification body, such as BSI, regularly visiting us to assess our management system, provides clients with reassurances that we can be a trusted partner to them." Court Enforcement Services was greatly encouraged when it was audited ahead of its BSI Stage One assessment by a Utility customer as part of a due diligence exercise. The auditors were massively impressed, not just by the policies and processes introduced, but by the culture embedded within the organisation in such a short time period.

### Benefitting Internally as well as Externally

Russ Poulter believes the internal benefits of implementing quality and information security management systems should not be overlooked. "Using our collective experiences and lessons learned from previous ventures, we had gained an appreciation of the need for appropriate solutions. As such, once we had conducted our risk assessment with Abriska, we were able to prioritise our risk treatment activities and develop a lean working environment where the focus was on discipline, security and consistency. The resulting benefits of all of this is that we save time in what we do and we greatly reduce the number of mistakes we make and the number of security breaches and incidents. This helps us to meet our business objective of delivering excellence to our clients and to be able to meet and exceed their expectations."

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