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From the Chief Executive

Rt Hon Alistair Carmichael MP
Chair of the Environment, Food & Rural Affairs Select Committee
House of Commons
London
SW1A 0AA

19 December 2025

By email to: EFRACOM@parliament.uk

Dear Mr Carmichael,

Thank you for your letter regarding debt-recovery practices and the support provided to vulnerable customers. We welcome the opportunity to outline our approach and to provide the information requested.

We do not use Suspended Committal Orders (SCOs) or Orders to Obtain Information as part of our debt-recovery processes. Therefore we do not have any policies and procedures, nor any data on their use.

We have however provided the additional information you requested in the attached spreadsheet. This includes the volumes of County Court Warrants and High Court Writs that have been issued by our organisation, with the volume that will have been visited by an Enforcement Agent (either County Court Bailiff or High Court Enforcement Officer). This includes the data we currently hold in relation to enforcement activity.

At present, we are unable to provide data showing the number of customers who were in receipt of means-tested benefits at the point a writ or warrant was issued. While we do not capture this information systematically, based on our insight we believe the proportion of affected customers who are in receipt of benefits is likely to be less than one-third.

Use of Enforcement Agents
We work only with accredited external partners. All enforcement agents used by our organisation are accredited and are held to account through the Enforcement Conduct Board. Our contracts and oversight processes require that suppliers adhere to strict standards, including those related to identifying and responding to vulnerability.

Vulnerability Safeguards
We have robust vulnerability processes both internally and with the suppliers we use. These processes ensure that any vulnerabilities—whether previously declared or newly identified during contact—are captured, reviewed and acted upon. Once a vulnerability is identified, we apply the appropriate procedures to ensure the customer receives the right support.

We have a number of dedicated measures in place to assist customers in vulnerable circumstances. By way of example, one customer on our Priority Services Register recently underwent an Extra Care Assessment with our specially trained team. Through this process we were able to identify unclaimed entitlements and signpost the customer to further support. As a result, the customer now receives an additional £466 per month and was able to obtain over £10,000 in back-dated benefit payments.

Complaints
Information on complaints to the Consumer Council for Water relating to enforcement actions is included within the attached documentation. Of the 15 complaints that were escalated to the Consumer Council for Water following enforcement action, none specifically related to failure to follow Ofwat's Paying Fair guidelines. However, as these complaints were from customers who had been subject to enforcement action, we have included this data for transparency.

Supporting customers with affordability
As a purpose-led business with our purpose enshrined in out Articles of Association, we remain committed to supporting all customers, especially those who are vulnerable or experiencing financial difficulty, and we continue to refine our processes to ensure they are fair, proportionate and compassionate. We recently became the first utility to be awarded the Mental Health Accessibility Certification from the Martin Lewis' Money & Mental Health Policy Institute and we continue to work hard to improve our support for customers.

We have a range of support for customers to ensure affordability, including: payment breaks, concessionary tariffs, forgiveness schemes and temporary instalment plans. Last year, we exceeded our Ofwat affordability target of by almost 100,000, supporting 405,425 customers in 2024/25. In an industry-first, we have also introduced a new Medical Needs Discount, fully funded by our owners. This will offer direct financial relief to those with specific medical conditions that drive higher water use – such as customers reliant on home dialysis – without increasing costs for other customers.

If you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely

Mark Thurston
Chief Executive

Year	County Court Bailiff (through a Warrant)- all warrants are under £1000	Volume of warrants that go to visit**	High Court Enforcement (through a High Court Writ) total volume	High Court Enforcement (through a High Court Writ)- Volumes granted under £1000	Volume of writs that go to visit***
2019	225	203	76	16	13
2020	401	361	145	69	56
2021	1456	1310	4145	2033	1647
2022	2280	2052	4747	2318	1878
2023	2544	2290	3561	2049	1660
2024	2136	1922	5122	2355	1908
2025	1435	1292	4774	2013	1631
Total	10477	9429	22570	10853	8791

We do not hold volumes prior to 2019. For much of 2019/2020 referrals for enforcement was turned off due to COVID

*Customers on benefits: we don't know how many of these customers are in receipt of benefits however we believe this it be less that a third. We have processes in place that support customers in vulnerable situations. The external parties that we work with are accredited organisations and for enforcement agents they are held account through enforcement conduct board.

**% of warrants that go to visit - the local courts issue warrants and we have averaged the volume of visits that based on the response from 2 local courts who advised that all warrants and visited unless the customer makes payment in full or an arrangement prior to the visit.

*** % of writs that go to visit - our visits are completed by external high court enforcement groups and they have advised the % of customers that they visit which we have averaged at 81% for the two organisations we currently work with.

CCW Complaints - 15 customers that have had warrants or writs since 2019 have had complaints that have escalated to CCW. These complaints have not directly quoted paying fair guidelines.