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Alistair Carmichael MP
Chair, EFRA Committee
House of Commons
Palace of Westminster
London
SW1A 0AA

23 December 2025

Dear Alistair,

Thank you for your letter regarding water company practices around debt recovery from vulnerable customers and for referencing the Committee's report *Priorities for water sector reform* (HC1001, 16 June 2025).

I want to assure you that we are committed to protecting customers in vulnerable circumstances, promoting affordability, and ensuring enforcement is used only as an absolute last resort and in line with regulatory expectations and good practice.

I have included links below to our Inclusivity Strategy, our Code of Practice for collections (managing debt) and our enforcement policy to help set out how we support our customers in vulnerable circumstances. We also ensure that any contractor working on our behalf outlines their approach to vulnerable customers, including sharing their policies and all standard communications before being appointed. We work with our contractors to ensure they act in the way we expect. For any external contractor working to collect unpaid charges and visit on our behalf we require bodycam recordings to be captured which we are able to review for training/compliance or customer investigation should an issue be raised.

We regularly audit the contractor's processes and monitor any complaints that relate to actions taken by our contractors or direct employees.

- For Everyone – Our customer inclusivity strategy 2025 – 2030
- Customer Summary – Our customer inclusivity strategy 2025 - 2030
- Managing Debt – January 2024
- Extra Care – A guide to our priority services

Enforcement Activity
In your letter you ask about Orders to Obtain information and Suspended Committal Orders (SCOs) for water and sewerage debts. We do not apply for Orders to Obtain information or Suspended Committal Orders in order to collect unpaid water charges from customers. We are aware however that there is a scenario where the court could technically choose to use a SCO if the defendant fails to follow their instructions within the Attachment of Earnings (AoE) process. We have included in our response an internal information sheet explaining committal orders in this context which might be useful.

In your letter you ask for data for each year since 2010 where it is available. We are able to share data from April 2018 onwards as prior to April 2018 we were using a legacy billing and collections system that is no longer in service. Following the decommissioning of the legacy platform the capability to generate new reports for this period is no longer available.

I have provided information regarding each of your data requests in the following section, the data is contained in the accompanying spreadsheet EFRA Data Table Jan 2026.xlsx as you requested.

Information Requests

1. **In how many cases were enforcement agents (bailiffs) sent to a home? How many of these cases concerned debts of under £1,000?**

   Table 1 contains data regarding the enforcement action. There are three types of enforcement activity which may involve a visit to a home.

   a) County Court Bailiffs – These are direct employees of the court who will visit customers properties to attempt to collect debt.

   b) Attachment of earnings – These are direct employees of the court who will visit customers properties to serve the papers that a customer is asked to complete detailing information regarding their employment.

   c) High Court Bailiffs – These are private bailiffs normally working for a High Court Bailiff Organisation such as Equita or Marstons who would visit a customer's property to collect debt.

   For all the enforcement scenarios detailed below we carry our pre-action scoring to attempt to screen out any households that are scored as low ability to pay/ in receipt of benefits, or where we hold a relevant vulnerability marker.

   County Court Bailiff

   The numbers in table 1 include the number of cases where we have requested a County Court Bailiff support recovery of the debt owed. These will be higher than the actual number where a visit has been attempted as the County Court Bailiffs initially attempt to communicate with the customer via a telephone call in order to remove the requirement of a home visit. The Court do not provide data regarding how many cases are unsuccessful at a telephone contact and therefore require a visit.

   Attachment of Earnings

   The Attachment of Earnings process involves several attempts to communicate with the customer prior to a visit taking place. In this process the court communicates with us when the customer does not engage and therefore, we can provide an accurate number of home visits by a County Court bailiff. This data is included in the numbers shown in Table 1.

High Court Bailiff

As per our collections process, we do use High Court Bailiffs where we believe, based on the data available to us at the time, that the customer has the ability to pay but is choosing not to. As part of our contracts with High Court Agencies we have agreed a bespoke "Pre-Writ" process, which involves the High Court agency attempting to contact the customer before visiting to try and engage with the customer and thus avoiding a visit.

High Court agencies are able to resolve an average of 11% of cases prior to a visit. The numbers in Table 1 also include the cases outsourced to a High Court Company where the initial attempts to contact have been successful and have progressed to visit.

2. How many Suspended Committal Orders (SCOs) have you sought against customers in total? Of these, how many owe less than £1,000 in water and/or sewerage charges? Of these, how many have been granted?

We do not request Suspended Committal Orders as a debt recovery activity. As highlighted earlier the Court may choose to instigate an order if they feel that the defendant is failing to respond to their instruction, this is not a decision we are party to. On the rare occasion this happens we are informed and have included that information in Table 2 for transparency.

3. **How many of these cases relate to debtors who were known to be in receipt of means-tested benefits at the time of enforcement?**

Our collections process assesses a customer's ability to pay and decides the most appropriate collections action based on this assessment. The assessment is based on the data we have collected on the customers circumstances and external credit reference agency data which indicates a high ability to pay and a higher-than-average likelihood of homeownership and employment.

Customers known to be receiving means tested benefits would not meet the criteria for enforcement and would be redirected away from court-based collection activities, and therefore none of the reported cases were known to have been in receipt of means tested benefits at the time of enforcement. Whilst our scoring decision making is looking at ability to pay based on credit data we could not fully rule out that some of these customers could be in receipt of benefits – it is however highly unlikely given the credit-based assessment.

Collections processes can take considerable time to work through the court system and customers circumstances can change during this process. We have further checks at key stages to flag any change in circumstances that might mean we need to change our approach.

4. **How many complaints were made to the Consumer Council for Water in connection with your company's enforcement actions and failure to follow Ofwat's Paying Fair guidelines on recovering debt?**

We have analysed our complaints records for the years in question and cross referenced them to our enforcement activities. Whilst we have received complaints from customers linked to the account's enforcement action was taken against, we have not been able to find any instances where the complaint has been escalated to CCW for these activities and failure to follow Ofwat's Paying Fair Guidelines. We have included the volumes of complaints we have recorded where an account is subject to enforcement action, although the actual cause of the complaint is not necessarily the activity itself. You can See form the data in Table 3 that complaint levels against accounts receiving these enforcement actions remains low at 1.7%, with almost all being resolved at the initial stage.

5. **Please also confirm the associated costs to your organisation of applying for and pursuing Suspended Committal Orders against those with debts of less than £1,000.**

   We can confirm that Northumbrian Water do not and have not applied or pursued a Suspended Committal Order against customers in debt, therefore the costs associated are zero.

Attached to this letter are relevant documentation which sets out our current policies and guidance, our approach to assessing vulnerability before any enforcement action and customer communications.

We have included the following useful documentation to support your request:

- Northumbrian Water Group Vulnerability Policy/strategy
- Northumbrian Water Group Enforcement Policy
- Northumbrian Water Group – Committal orders explained training document
- High Court Enforcement Vulnerability Policies
- Annual training provided to High Court Companies

Please do not hesitate to contact me should you need further information or clarification.

Yours sincerely,

H Mott

Heidi Mottram CBE
Chief Executive

Table 1 - Enforcement Cases

Year	Total cases where enforcement agents were sent to a home	Cases which concerned debts Over £1,000	Average Debt >£1,000	Cases which concerned debts under £1,000	Average Debt <£1,000
2018	1,090	399	£1,722	691	£624
2019	1,924	745	£1,563	1,179	£661
2020	1,013	309	£1,556	704	£624
2021	4,547	2,387	£1,372	2,160	£836
2022	2,735	1,309	£1,566	1,426	£826
2023	3,231	1,526	£1,545	1,705	£825
2024	2,294	1,225	£1,781	1,069	£789
2025	4,389	2,444	£1,690	1,945	£817

Table 2 - Court Instigated SCOs within Attachment of Earnings Service Process

Year	Cases where the Court have initiated and granted Committal order due to breach of court compliance	Cases which concerned debts Over £1,000	Cases which concerned debts under £1,000
2018	9	4	5
2019	15	3	12
2020	8	3	5
2021	35	14	21
2022	54	22	32
2023	21	12	9
2024	16	3	13
2025	12	6	6

Table 3 - Complaints raised where an account is subject to Enforcement (May not be about the Enforcement)

Year	Stage 1 Complaints <£1,000	Stage 1 Complaints <£1,000	Stage 2 Complaints <£1,000	Stage 2 Complaints <£1,000	CCW Complaints >£1,000	CCW Complaints >£1,000
2018	6	17	0	0	0	0
2019	29	33	0	0	0	0
2020	8	14	0	0	0	0
2021	41	62	0	1	0	0
2022	33	24	0	0	0	0
2023	28	18	0	0	0	0
2024	6	11	0	0	0	0
2025	13	12	0	0	0	0

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