Chris Weston
Chief Executive Officer

Rt Hon Alistair Carmichael MP
Chair, Environment, Food and Rural Affairs Committee
SENT VIA EMAIL

23 December 2025

Dear Chair,

Thank you for your letter seeking information on Thames Water's approach to debt recovery and the use of enforcement measures.

I have included the full figures in answer to your questions in the Appendix. The policies from our litigation partner, Moriarty Law, in relation to their vulnerability policy, treating customers fairly and consumer duty are attached to my email.

Debt recovery is a last resort, and all cases are rigorously tested to identify any vulnerabilities, with any enforcement halted if they are. However, we also have a responsibility to ensure that customers do not pay more than they should to subsidise a refusal to pay by others who can afford to do so.

Before any case is considered for litigation or enforcement, we undertake extensive engagement for upwards of 12 months, through letters, phone and email, offering support, affordable payment plans and signposting assistance.

To summarise the support we offer customers:

- Our WaterHelp tariff reduces bills by 50% for households where the bill is more than 5% of their net income, accounting for the number of occupants.
- In addition to this, our WaterSure scheme caps bills at £471 for households with large families or water-dependent medical conditions.
- Customers with a deficit household budget can receive an Extra Support Payment of up to £700, helping households to manage and spread out their monthly bill in a way that is affordable to them.

In total across all of our schemes, we provided £133 million in affordability support in the first half of 2025-26, double the £67 million we provided during the same period of the previous year.

Only once reasonable engagement has been exhausted do we consider passing a case to our litigation partner, Moriarty Law. Moriarty Law provides litigation services in full compliance with the Solicitors Regulation Authority, Civil Procedure Rules, the Pre-Action Protocol for Debt Claims and the expectations placed on suppliers supporting a regulated water provider under Ofwat's customer protection framework. Less than 0.0005% of all cases placed with Moriarty Law have ever been escalated to High Court Enforcement, a last resort used only after extensive engagement.

We do not instruct Moriarty Law to use Suspended Committal Orders. Similarly, we do not instruct Moriarity Law to use Statutory Charging Orders, Orders to Obtain Information, or property-based enforcement. The only enforcement route they utilise, in very limited circumstances, is the instruction of County Court Bailiffs or High Court Enforcement Officers.

Moriarty Law's model is expressly designed around fairness, proportionality and safeguarding. Key safeguards include:

- Layered assessments to identify any vulnerability before litigation or enforcement: These include the LawScore suitability model, a solicitor-led proportionality review, and repeated vulnerability screening, to help understand behavioural, financial and historic indicators that can be identifiers of vulnerability. Data is never used in isolation; direct customer engagement remains central to identify individuals who may be at risk and if any welfare concern is identified at any stage, escalation is paused immediately.
- Double approval before any instruction: Moriarty cannot instruct enforcement without Thames Water's explicit approval. After Moriarty's internal checks, we conduct an independent case-level review and must agree that enforcement is appropriate.
- Second approval before any seizure: Prior to any potential seizure of goods, both Moriarty and Thames Water reconfirm that circumstances have not changed and that enforcement remains proportionate.
- Vulnerability checks at every stage: At all three stages prior to enforcement (pre-action, pre-litigation, pre-enforcement) and again prior to any potential seizure, vulnerability checks are carried out. Enforcement is strictly prohibited if any vulnerability is identified, such as health concerns, mental capacity issues, bereavement, financial hardship, comprehension barriers, age-related concerns, or any circumstance where enforcement may cause detriment.

In addition to Moriarty Law's own controls we maintain robust governance and oversight of their work for us:

- We contractually require adherence to our vulnerability policies.
- We review complaints, conduct regular spot check assessments on their calls with customers, and hold weekly and monthly performance reviews to ensure standards are met and learnings are captured and acted on.
- We conduct an annual ISO audit of Moriarty Law, assessing documentation, training, signposting and the handling of potentially vulnerable customers.

Enforcement is used extremely rarely, in proportion to the debt in question, and only following extensive engagement and rigorous checks, including that it is aligned with Ofwat's customer protection expectations.

Protecting customers, especially those who may be vulnerable, is a critical part of building trust with our customers and their representatives. I hope this letter reassures the Committee about the rigour and restraint we apply in this area.

Yours sincerely,

Chris Weston
Chief Executive Officer

Appendix:

You asked for figures relating to enforcement agents and Suspended Committal Orders, with further breakdowns by debt level and vulnerability.

The figures provided are from 2023, 2024 & 2025 (to date). In 2023 we undertook a trial with Just Debt. In 2024 we started to work with Moriarty Law.

Litigation was suspended during the COVID-19 pandemic and subsequently resumed in 2023 with the initiation of the proof-of-concept phase. This progressed into a formal contractual arrangement with Moriarty in 2024. No data prior to the pandemic is available. The decision to engage an external firm has allowed for a centralised and specialist capability to manage complex litigation and enforcement effectively. This approach ensures cost control while, more importantly, safeguarding robust governance across process, policy, and standards in relation to customer vulnerability.

In 2023 33 enforcement orders were taken forward, representing 0.00087% of households for whom we provide their water bill. In 2024 this figure was zero as no further cases proceeded to High Court Enforcement stage until 2025, when there have been 160 cases to date, equivalent to 0.0042% of our billed households.

Our 2023, 2024 & 2025 returns are as follows:

No.	Question	2023	2024	2025
1	How many cases were enforcement agents (bailiffs) sent to a home?	33	0	160
2	Of the cases in (1), how many concerned debts of under £1,000?	12	0	10
3	Of the cases in (1), how many were known to be in receipt of means-tested benefits at time of enforcement?	0	0	0
4	How many Suspended Committal Orders (SCOs) have you sought?	0	0	0
5	How many cases in (4) have been granted?	0	0	0
6	Of the cases in (4), how many were known to be in receipt of means-tested benefits at time of enforcement?	0	0	0
7	How many SCO cases concerned debts of under £1,000?	0	0	0
8	Of the cases in (7), how many were granted?	0	0	0
9	Of the cases in (7), how many were known to be in receipt of means-tested benefits at time of enforcement?	0	0	0
10	Please confirm the costs of applying for SCOs (year by year)	0	0	0

Notes:

- “Enforcement agents sent to a home” reflects an instruction issued following our two-stage approval process and vulnerability re-checks; it does not mean goods were seized in every case.
- As explained in our letter, Moriarty Law, our litigation partners, do not seek Suspended Committal Orders; accordingly, the figures are zero.