



Llywodraeth Cymru  
Welsh Government

[www.cymru.gov.uk](http://www.cymru.gov.uk)

Welsh Government

## Consultation – summary of responses

### Tackling Bad Debt within the Water Industry in Wales:

The Water and Sewerage Information  
(Non-owner Occupiers) Regulations

August 2014



## **Overview**

This document provides a summary of the responses received by the Welsh Government to the consultation on Tackling Bad Debt within the Water Industry in Wales: the Water & Sewerage Information (Non-owner Occupiers) Regulations.

## **Audience**

Local Authorities, Housing Associations, Registered Social Landlords, Private Landlords, Consumer Groups, Water Companies, Regulators for the Water Industry, third sector organisations and representative bodies.

## **Action Required**

None – for information only.

## **Further information**

Enquiries about this document should be directed to:

Water Branch  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

Email: [Water@wales.gsi.gov.uk](mailto:Water@wales.gsi.gov.uk)

Tel: 029 2080 1397

## **Additional copies**

This document can be accessed from the Welsh Government's website at [www.wales.gov.uk/consultations](http://www.wales.gov.uk/consultations).

## Contents

Introduction	4
1. Overview.....	4
2. Background .....	5
3. Detail of responses.....	6
Analysis of responses	8
4. Regulatory Impact Assessment: Costs and Benefits .....	8
5. Information to be provided about non-owner occupiers (Regulation 3).....	9
6. Timing and procedure (Regulation 4) .....	12
7. Exemption from liability (Regulation 5) .....	13
8. Service (Regulation 6) .....	15
9. Change of owner (Regulation 7).....	15
10. General comments .....	17
Next Steps	21
Appendix A	22
Appendix B	23

## **Introduction**

### **1. Overview**

This consultation sought views on the implementation of the Welsh Government's proposed Water and Sewerage Information (Non-owner Occupiers) Regulations, under the provisions in Section 144C of the Water Industry Act 1991, as amended by Section 45 of the Flood and Water Management Act 2010.

The aim of these Regulations is to enable information on non-owner occupiers to be made directly available to water and sewerage companies, to better help reduce the high levels of bad debt that currently exist within the water industry in Wales.

The consultation ran for a period of 12 weeks, starting on 17 July 2013 and ending on 6 November 2013. The consultation was published on the Welsh Government website and sent to a wide range of stakeholders.

## **2. Background**

The Welsh Government is committed to social justice and equality of opportunity. In particular, we are concerned about the level of water charges and the impact of increases on those customers served by water companies who are least able to pay.

'Bad debt' in the water industry often results from unpaid bills that end up written off by a company as a loss, either because the debt cannot be collected, or where the cost of pursuing the debt exceeds the cost of the debt itself. Over the last decade, water and sewerage companies have seen an increase in the amount of bad debt as a direct result of households not paying their water and sewerage bills. The cost of debt from non-payment of water bills is borne by all paying customers and in Wales, this currently adds approximately £20 per year<sup>1</sup> to each bill.

The Welsh Government is committed to assisting the water and sewerage industry to reduce this level of debt in order to help lower bills, in line with our commitment to Tackling Poverty.

In July 2013, we consulted on draft regulations which formed the basis of how the Welsh Government would implement the provisions in Section 144C of the Water Industry Act 1991. These provisions allow for information on non-owner occupiers of households (e.g. tenants) to be made directly available to water and sewerage undertakers.

---

<sup>1</sup> Based on calculations provided by Dŵr Cymru Welsh Water.

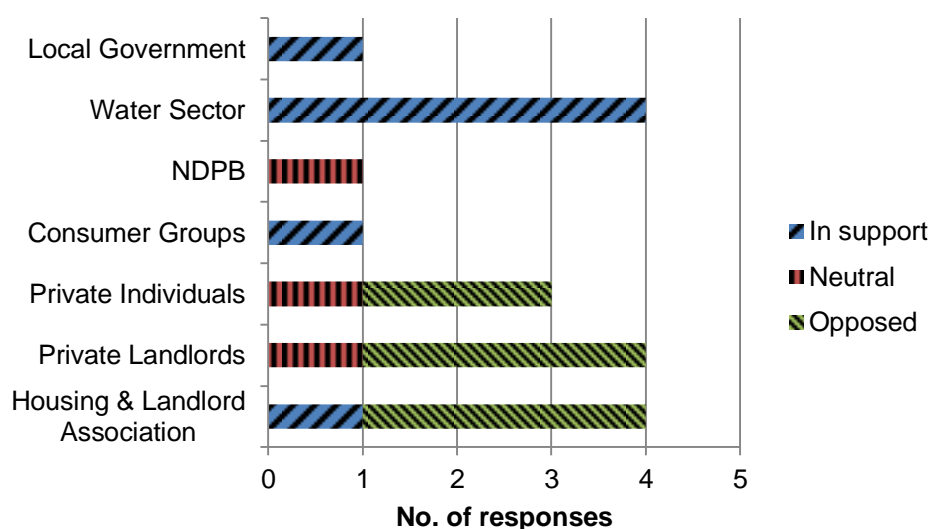
### 3. Detail of responses

A total of 18 responses were received to the consultation. A profile of respondents is provided below.

Table 1 - Breakdown of responses by sector and opinion

Sector type	Number of respondents			
	In Support	Neutral	Opposed	Total
Housing and Landlord Associations	1	0	3	4
Private Landlords	0	1	3	4
Private Individuals (no affiliation disclosed)	0	1	2	3
Consumer Groups	1	0	0	1
Non-departmental public bodies (NDPB)	0	1	0	1
Water Sector	4	0	0	4
Local Government	1	0	0	1

Figure 1 Breakdown of responses by sector



#### Key points

- Of the 18 responses received, 6 were explicitly supportive of the intention to make regulations – 4 from the water sector, one from a Housing Association and one from Local Government:
  - There was general agreement amongst those responding in the positive to the consultation that the current situation regarding water debt is unsustainable and if nothing is done, will only continue to rise thereby adversely affecting all paying water customers.
  - Several respondents commented that the proposed regulations would enable water companies to take a preventative approach to water debt, helping to identify those who might qualify for reduced tariffs and making tenants aware of water charges at an early stage so preventing a build up of debt.

- The consumer body was broadly, if not explicitly, supportive of the regulations and provided comments on each regulation as to its effectiveness or where it might be improved.
- 3 responses – an NDPB, a private individual and a private landlord – are best described as neutral on the proposal to make regulations.
- The remaining 8 responses were more or less opposed or had several concerns about the proposal to make regulations. These responses came from Housing Landlord Associations, private landlords and private individuals.
- The five responses that were strongest in their opposition to the intended regulations came from Private Landlords and Private Individuals:
  - Three respondents questioned the fairness of the proposal and were of a view that the regulations were an attempt to make landlords responsible for the debt of their tenants.
  - One respondent questioned why government was getting involved with private companies' debt collection issues and suggested that this was a matter for the companies to resolve, rather than government.
  - One respondent expressed unhappiness with Section 144C of the Water Industry Act 1991 and suggested that the position was covered by 'privity of contract' i.e. the position that a contract cannot impose rights or obligations arising under it on any person or agent except the parties to it.
  - Three respondents queried whether the Regulatory Impact Assessment actually demonstrated the need for regulations.

A detailed assessment of responses, broken down by regulation / consultation question is provided in the next section. Copies of non-confidential responses received in their original format and language will be published on the consultation page of our website. This can be found at

<http://wales.gov.uk/topics/environmentcountryside/epq/waterflooding/?lang=en>.

## Analysis of responses

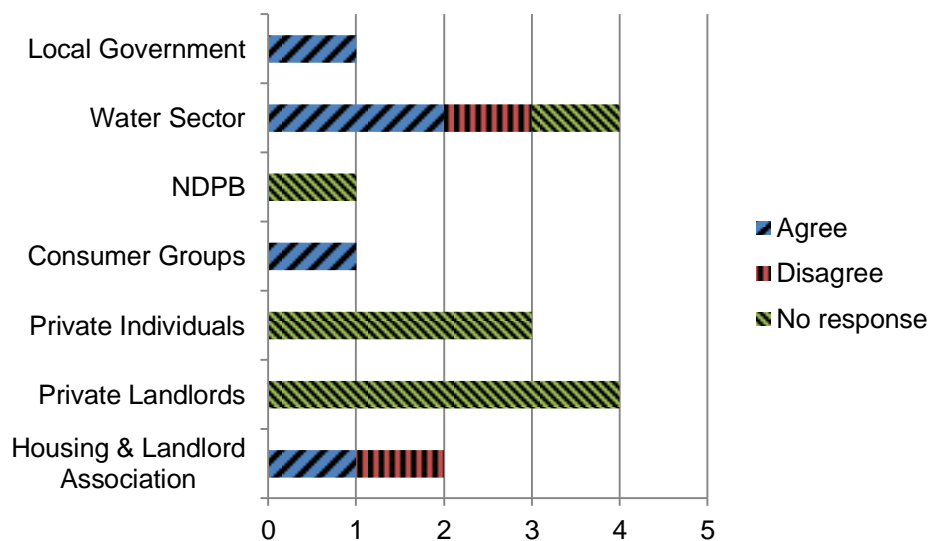
### 4. Regulatory Impact Assessment: Costs and Benefits

A Regulatory Impact Assessment (RIA) was undertaken to look at the likely and anticipated costs and benefits of the draft Regulations. The RIA found in favour of implementing the Regulations, identifying substantial benefits to customers and water companies likely to arise from the potential reductions in costs of servicing outstanding revenue.

It is anticipated that implementation of the Regulations will reduce 'bad debt' and the associated chase and financing costs currently passed on to other customers, reducing all water bills and resulting in a net benefit to society.

**Question 1:** Do you agree with the estimated costs / benefits arising from the implementation of these Regulations or otherwise wish to comment upon any area of the Regulatory Impact Assessment?

Figure 2 Summary of responses to Q1



Key points raised included:

- Of those that responded to the question, the majority agreed with the estimated costs and benefits set out in the RIA.
- Community Housing Cymru and Counsumer Council for Water commented that the RIA demonstrated the information gap which, if filled, will help water companies take a preventative approach to water debt, identifying those who may have affordability problems at an early stage.
- Some members of Community Housing Cymru expressed concern that if landlords were held liable for water debt, the cost would eventually be passed onto tenants. It was felt that the RIA hadn't fully taken this into account in the costs.



- One respondent, the Residential Landlords Association, had several concerns about the RIA; in particular, that the estimated ‘Transition Costs – Landlords’ were far too low and there is too great an assumption that all landlords will actively make themselves aware of the new obligations. They also questioned whether the stated benefits really outweigh the potential cost and extra regulatory burden to landlords. They conclude by stating that “*it will be vital for the Welsh Government to monitor and keep landlords informed of how effective the new regulations are proving to be*”.

**Welsh Government response:** The intention of the regulations is to better ensure the billing of and collection of payment from non-owner occupiers and not to default responsibility for debts to the owner. The liability for charges will always be with the occupier, with the joint and several liability only applying to owners until such time as they provide the required information - it is intended as an incentive to comply rather than a mechanism for water companies to pursue landlords instead. The Welsh Government has agreed to facilitate the production of guidance to provide further clarification on this and other points.

We recognise the need to monitor and evaluate the impact of the regulations and will work with water companies and landlord associations to establish a baseline which we can measure against over time.

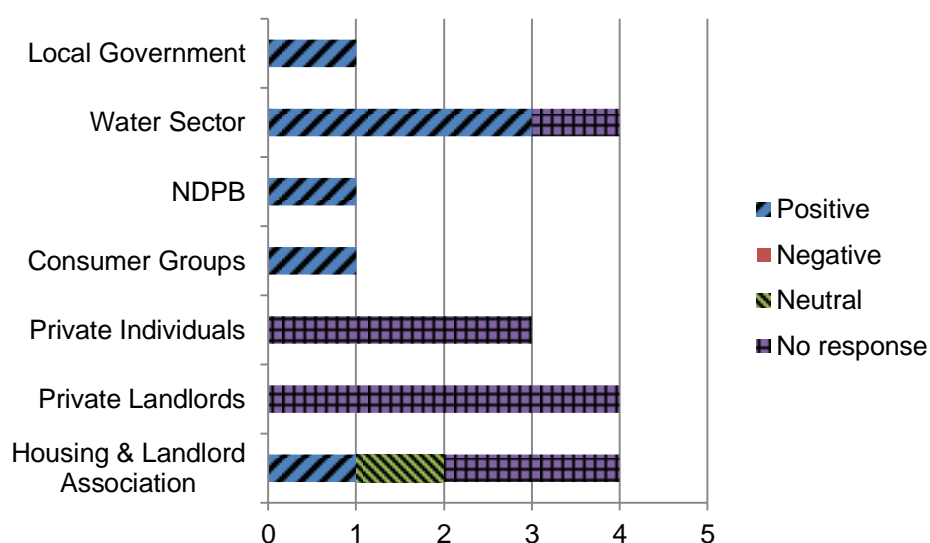
## **5. Information to be provided about non-owner occupiers (Regulation 3)**

Regulation 3 sets out the details that owners will be required to provide about occupiers of their premises. In order to minimise the burden on owners, the consultation proposed collecting only the most basic level of detail required to effectively bill (and if necessary, pursue) a customer.

This regulation also sets out: when an occupier might be exempted from having their details disclosed; the number of occupiers whose details are required; and occasions when date of occupancy might not be required (Question 2). In addition, it also sets out the requirements for informing an occupier that this personal information has been provided to an undertaker and explains how an owner should inform an undertaker where they have any doubts as to whether the information they are providing is accurate or complete (Question 3).

**Question 2:** Do you have any comments upon any of the provisions in Regulation 3 concerning the personal details being requested about occupiers?

Figure 3 Summary of responses to Q2



Key points raised included:

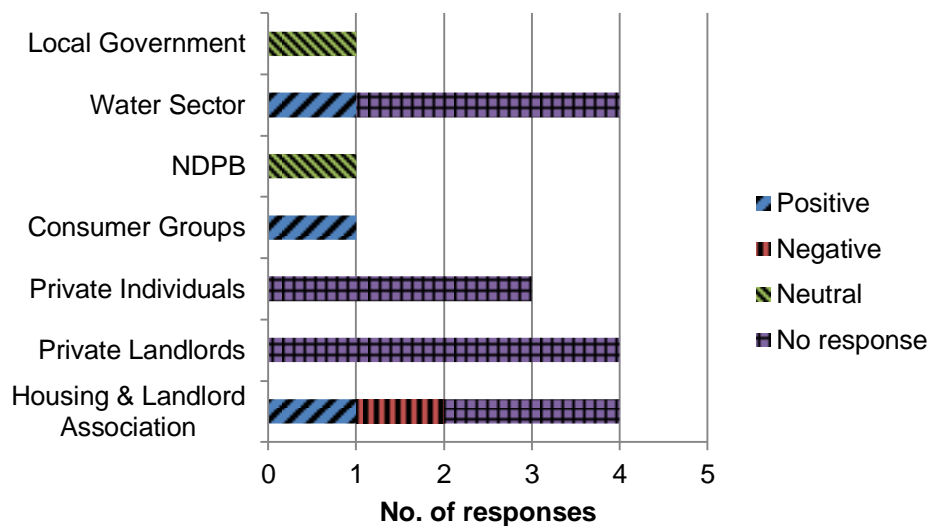
- The majority of respondents to this question were positive, particularly in relation to the type of information required to be collected from tenants.
- Respondents from the water sector suggested additional pieces of information that would be useful, such as contact telephone numbers and meter reading information. In addition, Dee Valley Water stated that *“it would be helpful if consideration could be given to multi-tenanted premises where no single tenant has sole control of the water supply”*.
- Community Housing Cymru raised the issue that the regulations could lead to additional resource implications for landlords, particularly at the start of a tenancy when information will need amending. Housing associations that collect water rates as part of their core business already pass on tenancy information to water companies, and in return receive a level of commission and reimbursement for their time which is not available to those who do not directly manage water accounts. There was concern from some members that there will be an increase in queries from water companies regarding the information provided.
- The Residential Landlords Association recognised the consideration taken in Regulation 3 concerning personal details being requested about occupiers becoming a burden on landlords. However, they raised a number of other concerns, in particular around the definition of ‘reasonable attempts’ in relation to checking the accuracy of information being provided to undertakers.

**Welsh Government response:** The Welsh Government notes the comments on multi-tenanted premises but can confirm that it is outside the scope of the Act to make landlords solely liable for multi-tenanted properties.

We recognise the concerns relating to increase in administration and queries and will ask the water companies to take full account of these when setting up their systems for processing the information and in the issue of any guidance.

**Question 3:** Do you have any comments on the provisions in Regulation 3 about communicating with occupiers or the provision of an owner's address?

Figure 4 Summary of responses to Q3



Key points raised included:

- All respondents to this question recognised the need for communicating with occupiers to make them aware that their details will be shared with the water companies.
- The Information Commissioners Office (ICO) highlighted the fairness provisions in the Data Protection Act (DPA) which state that, for any kind of data processing to be fair, the individual concerned must be provided with information such as why the data is held and to whom it might be passed on. The individual should be told this as soon as possible, and preferably before the particular data processing takes place. The ICO suggested that the wording in the draft regulations may not be strong enough to meet the DPA requirements.
- The Residential Landlords Association had several concerns about this regulation. In particular, they had some doubts about the general awareness amongst landlords as to data protection requirements. They also queried whether, under regulation 3(5)(b), an agent's address could be provided instead as many landlords use third parties to communicate with tenants.

**Welsh Government response:** The Welsh Government will review the wording of the regulations in light of comments from the ICO, in relation to fairness provisions in the Data Protection Act.

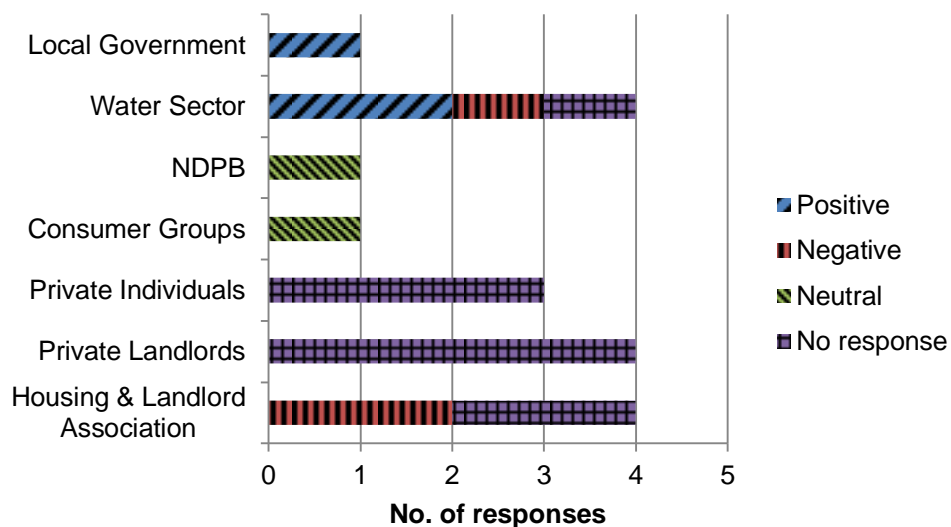
While the Welsh Government appreciates that many landlords use third party agents to manage their properties and communicate with tenants, the address provided to water companies will need to be either the home or work address of the owner themselves as it is ultimately their responsibility to ensure the occupiers information is passed to water companies, regardless of whether they request a third party to undertake the task.

## 6. Timing and procedure (Regulation 4)

Regulation 4 sets out when and how the duty is to be complied with. The draft regulations proposed a 21 day 'grace period' from the commencement date, before the duty takes effect. At this point, owners would have 21 days to provide the required information; if they do not provide the information within this timescale, they would become liable, along with the occupiers, for charges at the property from the date the duty took effect.

**Question 4:** Do you have any comments on any of the provisions in Regulation 4 concerning the timing of when the duty takes effect or the period when compliance is required?

Figure 5 Summary of responses to Q4



Key points raised included:

- This question had a more mixed response than previous questions, the main difference being that the water sector would ideally like the information within days of a change in occupancy, to allow meter readings to be taken; while the housing and landlord associations both felt that 21 days may not be long enough due to there not always being immediate notification of occupiers leaving a property.

**Welsh Government response:** The Welsh Government has considered all responses and believes that the proposed timescales achieves an appropriate balance between the requirements of water companies and landlords.

## 7. Exemption from liability (Regulation 5)

Regulation 5 sets out the situations when an owner would not become liable for charges at the property:

- If they are in compliance with Regulation 3 and have made every attempt to verify the validity of the data provided to the water undertaker, but subsequently learns that the information is false or incomplete and notifies the undertaker accordingly.
- If they have made all reasonable efforts to supply the required information within 21 days of the duty first applying, then they will be exempt from any liability for charges accrued after the compliance date.
- If the required information is supplied after the 21 days when the duty first applies, the owner will not be liable for any charges after the date the information was supplied.

**Question 5:** Do you have any comments about the requirement for an owner to inform an undertaker of any doubts concerning the information they are providing about occupiers?

**Question 6:** Do you have any comments on the exemption from liability for charges accrued after the compliance date, where information has been supplied within 21 days of the date when the duty first applies?

**Question 7:** Do you have any comments on the exemption from liability, where the owner has provided the undertaker with the information required after the 21 day period when the duty first applied?

Figure 6 Summary of responses to Q5

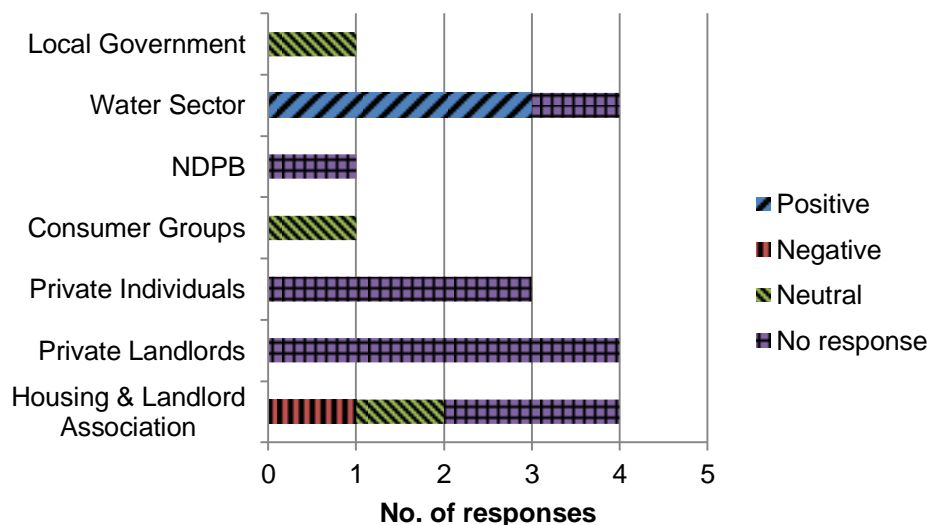


Figure 7 Summary of responses to Q6

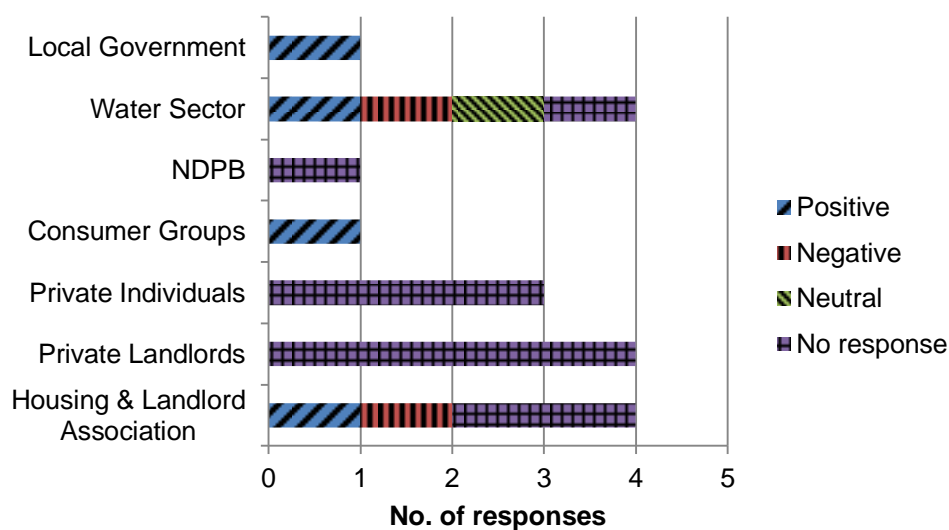
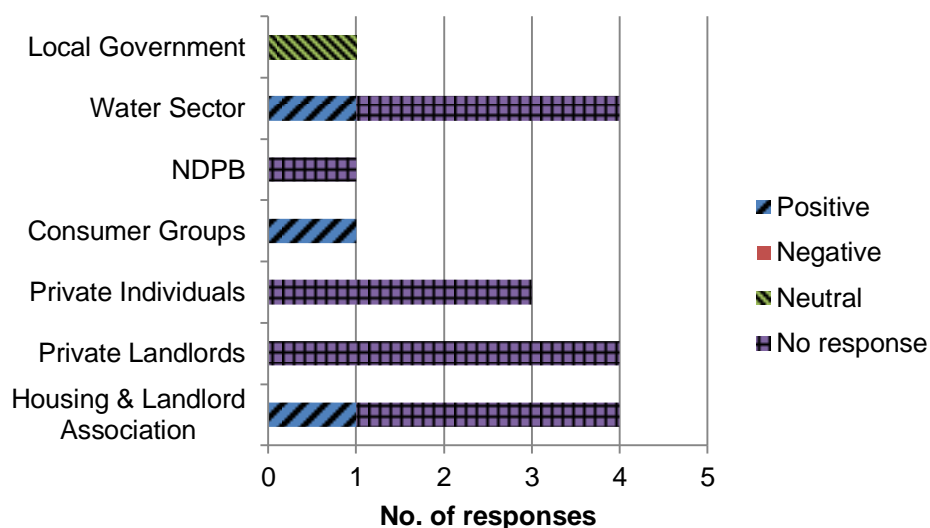


Figure 8 Summary of responses to Q7



Key points raised included:

- In general, the responses to these questions were positive. However, there were calls for further clarification on the issue of ‘reasonable efforts’ regarding provision of correct information.
- The Residential Landlords Association suggested that there should be provision for the time limit to be extended, if the landlord has made a reasonable effort to obtain the information within the 21 days but has not met the deadline due to circumstances outside their control.
- One respondent also stated that they felt more clarity was needed around the owner’s liability if they submitted the data after the specified 21 days.

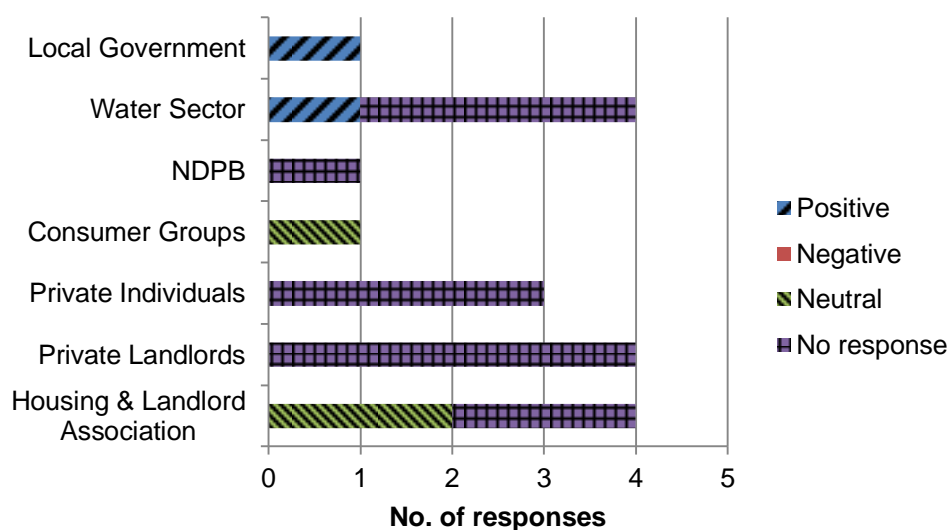
**Welsh Government response:** The Welsh Government has agreed to facilitate the production of guidance to provide further clarification on these and other points and this will be published alongside the regulations.

## 8. Service (Regulation 6)

Regulation 6 details the methods and specifics of how an owner should provide occupiers' details to the undertaker. While the preferred method of the water companies for receiving this information will be via the new web-based portal *Landlord TAP* which has been developed by Water UK and landlord associations, the regulations also allow for a range of other methods to be used.

**Question 8:** Do you have any comments on the provisions in Regulation 6 concerning how an owner should provide occupiers' details to the undertaker?

Figure 9 Summary of responses to Q8



Key points raised included:

- The main focus of responses to this question was the use of the portal, and the importance of tying the regulations in with this, both time-wise and encouraging its use. However, comment was made that it is important not to exclude those landlords who may choose to use other means to supply the information.

**Welsh Government response:** We recognise that the web-based portal is the preferred option for submitting occupier information and the water companies and landlord associations are free to publicise it as such. However, for equality and accessibility reasons we cannot legally require submission of information through this route alone and water companies must allow landlords to submit information in whichever format is most appropriate for them.

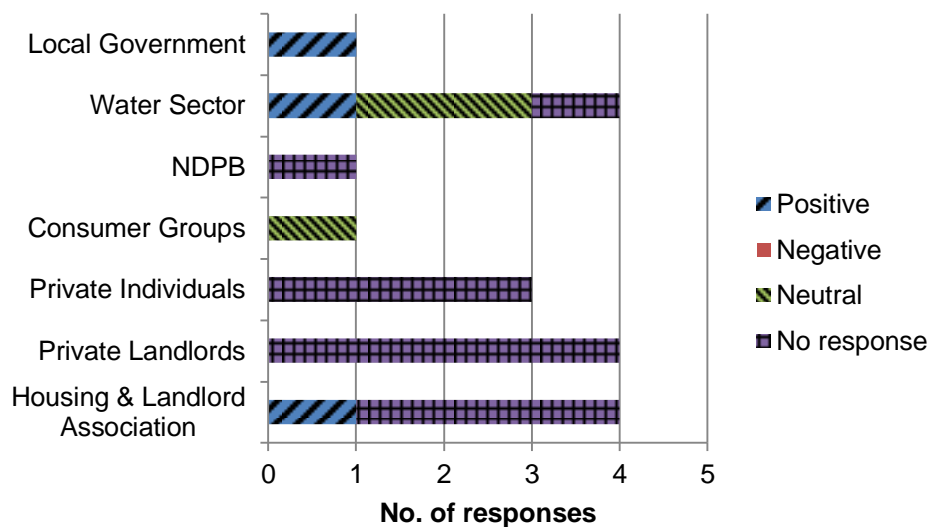
## 9. Change of owner (Regulation 7)

Regulation 7 sets out when an owner's liability for any charges, in those circumstances where any exists, ends upon their ceasing to be the owner at an occupied property and how the duty affects the new owner of the property.

The regulation states that from the date that they ceased to be owner of the property, they will no longer be liable for charges incurred after that date; however, they will continue to be liable for any outstanding charges incurred while still owner of the property if they failed to supply the occupiers information to the water company as per the regulations.

**Question 9:** Do you have any comments on any of the provisions in Regulation 7 concerning change of ownership at an occupied property?

Figure 10 Summary of responses to Q9



Key points raised included:

- Generally respondents were positive about this regulation, although a couple of them sought further clarification on points of detail.
- In addition, Consumer Council for Water suggested that “*details of the change of ownership should be required to be notified to the water company by the existing landlord before liability under Section 144C(3) of the Water Industry Act 1991 can be discharged*”.
- The Residential Landlords Association suggested that “*if notice has not been given by the previous owner, the new owner should be given a period of grace before they are liable*”.

**Welsh Government response:** The Welsh Government notes the Consumer Council for Water’s suggestion about provision of new ownership information by the previous owner but can confirm that this is outside the scope of the provisions of the Water Industry Act. We will consider the suggestion of a period of grace for new owners in preparing the final regulations.



## 10. General comments

**Question 10:** We welcome your views and comments on any aspect of the Regulations or the Regulatory Impact Assessment, including anything you feel we may not have addressed.

In addition to those respondents who provided comments on individual regulations & consultation questions, several respondents submitted more general statements of support or opposition to the regulations.

### Housing and Landlord Associations

- Pembrokeshire Housing disagreed with the RIA in terms of whether its findings actually presented a substantial problem requiring a solution. In particular, they disagreed with the analysis of costs that would fall to landlords and thought that these would inevitably fall to tenants to pick up. They suggested that the regulations would ultimately have an unequal and adverse impact on Wales' most vulnerable citizens. They proposed an alternative voluntary approach whereby water companies would compensate landlords for the costs associated with providing the data requested.
- Whilst the Residential Landlords Association would also prefer a voluntary approach to a regulated one, they stated in their response that:

*“The RLA cannot dissent from the general objective that bad water debt in Wales does need to be tackled, as it does elsewhere in the UK to prevent water bills further increasing and paying customers having to pay for those who do not. We agree that the current system does not do enough to ensure that tenants pay their bills when the water company legally cannot cut debtors off, however much is owing on the bill, or insist on a contract with the occupier before providing a service.”*

The RLA's main concerns are that the proposed regulatory approach constitutes an additional and disproportionate burden on landlords, as details of tenants are only estimated to be unknown in around 1.7% of cases. Additional concerns focused on the requirement on landlords to “warrant” the accuracy of information supplied; that water companies may not use the information effectively to pursue the debt from occupiers; and a lack of clarity around how the initial ‘trigger’ will operate by way of a notice from the water company to the landlord and how the requirement will be communicated.

- Cardiff Community Housing Association stated that they would support the proposed regulations as they were aware that many of their tenants do not contact the water company as a priority when moving in, and end up with a large unpaid bill to try and manage. They also stated that they would prefer a simple e-form to complete, to keep the process as quick and simple to manage as possible.

- Community Housing Cymru requested that a full consultation is undertaken with landlords, to establish the impact of the implementation of the proposals on their businesses and associated costs. They also recommended that the RIA be expanded to gain a better understanding around necessary adjustments to IT systems and the associated costs. They asked that appropriate and detailed guidance be issued to landlords.

**Welsh Government response:** The Welsh Government considers that a regulatory approach will have the most impact in tackling the issue of non-payment of water charges at non-owner occupied properties. However, we will review the timing of this approach and consider the introduction of a transition period to enable engagement with landlords. We will work with water companies and landlord associations to ensure that the process for submitting information is as simple and quick as possible.

### Private Landlords

- Dr David Harwood was generally in support of the regulations, and stated that in fact he would normally inform the utility supplier of the change of occupation. He also suggested that collection of the tenants national insurance number could also be helpful as this is *“a unique identifier that can be traced especially if on benefits or in the tax system”*.
- Don Higgs was opposed to the proposed regulations and felt that they were failing to address the *“problem creators”* and the fundamental aspect associated with bad debt, which, whilst entailing legislation to be put in place, would also make those persons who do “run up debt” accountable for their actions. The response also suggested that the system should be amended to ensure that measures be put in place to allow provision of new addresses to enable pursuit of anyone who defaulted on a debt.
- Ian Williams was also opposed to the regulations, on the grounds that it appeared to be an attempt to make property owners liable for a debt they did not incur, and felt that it would enable tenants to continue running up debts safe in the knowledge that they would not be pursued.
- One respondent in this sector, Richard Thomas, questioned why government was getting involved with private companies’ debt collection issues as it should be a matter for the companies to settle themselves. He also suggested alternative legislative approaches, for example, enabling water companies to have access to tenant information automatically when landlords collect or release a bond.

**Welsh Government response:** The policy objective of the proposed regulations is to reduce the level of 'bad debt' in the water industry thus having a positive impact on customer bills. It is intended that the regulations will enable water companies to establish customer relationships with more non-owner occupiers and make tenants fully aware of their liability for water charges via the receipt of personalised bill. The liability for charges will always be with the occupier, with the joint and several liability only applying to owners until if they fail to provide the required information with the prescribe time period - it is intended as an incentive to comply rather than a mechanism for water companies to pursue landlords instead.

### Private Individuals

- One respondent, Mark Isaacs, provided two suggestions on a way forward for dealing with 'bad debt'. Firstly, making the owner of a property liable as they have access to the tenants and can pass on costs, as well as being easy to find. Secondly, he suggested switching to a program of universal metering with charges weighted to penalise excessive water use e.g. a sufficient quantity of water for drinking, washing, cleaning etc is permitted free of charge but people using water excessively for 'luxury' reasons e.g. swimming pools, watering gardens etc should pay a premium.
- Marilyn Morgan OBE objected strongly to the proposal to make landlords jointly liable and questioned the legality of the proposal, given that the landlord has no contract with the water company. She suggested that the sensible alternative would be to place on landlords a requirement to provide contact details of all tenants to the water companies. She felt that this was much more reasonable and that 'policing' this approach could involve removal of the landlord's accreditation or licence.
- Suzy Davies AM expressed her unhappiness with Section 144C of the Water Industry Act 1991 and suggested that the position was covered by 'privity of contract' (i.e. the position that a contract cannot impose rights or obligations arising under it on any person or agent except the parties to it).

**Welsh Government response:** The liability for charges will always be with the occupier, with the joint and several liability only applying to owners until if they fail to provide the required information with the prescribe time period - it is intended as an incentive to comply rather than a mechanism for water companies to pursue landlords instead.

### Water Sector

- Northumbrian Water Limited stated that they strongly support the introduction of regulations requiring the provision of information on tenants from landlords to water companies. They introduced a landlord web portal in 2010, in preparation for the introduction of the landlord registration, and whilst at the moment it's use

is still voluntary, to date only 2500 landlords have registered 25,000 properties and have used the system to notify us of 45,000 tenancy changes out of an estimated 363,893 tenanted properties. This means that despite wide promotion of the site through local landlord associations, after two and a half years of a voluntary approach, less than 7% of tenanted properties are registered within their notification system.

## **Next Steps**

The consultation responses will inform the drafting of the final regulations. The analysis of responses highlighted a number of areas where additional clarification was required and with this in mind, a supporting guidance document will also be produced.

## Appendix A

### Consultee List

Association of Residential Letting Agents  
Association of Residential Managing Agents  
Barnardos  
Bridgend County Borough Council  
British Property Federation  
British Water  
Bromford Housing  
Cardiff City Council  
Caerphilly County Borough Council  
Carmarthenshire County Council  
Ceredigion County Council  
Chartered Institute of Housing  
Cheshire West and Chester  
Citizens Advice Cymru  
Community Housing Cymru  
Consumer Council for Water  
Consumer Focus  
Council of Mortgage Lenders  
Cymorth  
Dee Valley Water  
Denbighshire County Council  
Department for Work and Pensions  
Elgar Housing  
Flintshire County Council  
Gofal  
Herefordshire Council  
Information Commissioner's Office  
Isle of Anglesey County Council  
Joseph Rowntree Foundation  
Welsh Local Government Association  
Kemble Housing  
Liberty  
Marches Housing  
MIND  
Money Advice Service  
National Association of Estate Agents  
National Approved Letting Scheme  
National Federation of Property Professionals  
National Federation of Residential Landlords  
National Landlords Association  
National Offender Management Service  
Neath Port Talbot County Borough Council  
Newport County Borough Council  
Ofwat  
Oxfam  
Pembrokeshire County Council  
Residential Landlords Association  
Rhondda Cynon Taff County Borough Council  
Royal Institute of Chartered Surveyors  
Severn Trent  
Shelter Cymru  
South Shropshire  
City and County of Swansea  
Tenant Services Authority  
The Property Ombudsman  
Torfaen County Borough Council  
Torfaen Demonstration Project  
TV Licensing  
UKWIR  
Unison  
United Utilities  
Vale of Glamorgan County Council  
Wales Coop  
Wales and West Housing  
Water UK  
Waterwise  
Welsh Tenants and Residents Federation  
Welsh Water (Dŵr Cymru)  
Wirral  
Wrexham County Council

## **Appendix B**

### **Respondents by Sector**

#### Housing and Landlord Association

Cardiff Community Housing Association  
Community Housing Cymru  
Pembrokeshire Housing  
Residential Landlords Association

#### Private Landlords

Dr David Harwood  
Don Higgs  
Ian Williams  
Richard Thomas

#### Private Individuals (no affiliation disclosed)

Marc Isaacs  
Marilyn Morgan OBE  
Suzy Davies AM

#### Consumer Groups

Consumer Council for Water

#### Non-departmental public bodies (NDPB)

Information Commissioner's Office

#### Water Sector

Dee Valley Water  
Dŵr Cymru Welsh Water  
Northumbrian Water Limited  
Water UK