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Flood and Water Management Bill

Impact Assessment - Liability for water bill payment

Last updated: 25 January 2010

Summary: Intervention & Options

Department /Agency:
Defra

Title:
Impact Assessment of liability for water bill payment

Stage: Initial pre-consultation

Version:

Date: 25 January 2010

Related Publications:

www.defra.gov.uk/environment/quality/water/industry/walkerreview/final-report.htm

Available to view or download at:

www.defra.gov.uk

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What is the problem under consideration? Why is government intervention necessary?

Since the ban on disconnection from water supply in 2000 the water industry has seen a disproportionate increase in levels of bad debt. It is estimated by Water UK that tenants are responsible for a significant proportion (40%) of water bad debt. Water companies must bill the 'occupier' of properties requiring the name and details of tenants. Currently tenants, and landlords, have no incentive to provide this information. This results in an information problem because water companies have no legal right to information about their customers and use excess resources chasing tenant debt. Intervention is necessary to give companies a legal right to information on their customers.

What are the policy objectives and the intended effects?

Ensure water companies have details of tenants to encourage early contact with tenants, to bill efficiently, discourage the build up of bad debt and, if necessary, pursue debts. Ensure billing dates coincide with tenants moving into and out of properties. Ultimately to reduce customers bills by bringing bad debt levels down.

What policy options have been considered? Please justify any preferred option.

i) do nothing, ii) amend legislation to require landlords to provide details about liable bill payers, iii) reverse ban on disconnection of water supply or introduce trickle valves, iv) amend legislation to make non payment of water bills a criminal offence. option ii) is preferred because it provides water companies with the information required to recover more revenue and engage further with customers. Other options posed health and social risks that we would not support.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?

This impact assessment will be updated at the time of drafting regulations when more information is available. We intend to review the policy every 5 years in line with the timescale for Ofwat's periodic review process.

Ministerial Sign-off For Final Impact Assessment:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

.....Date:

Summary: Analysis & Evidence

Policy Option: 2

Description: Minimum implementation of EU Regulation

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' Not possible to accurately monetise costs until regulation is specified. Illustrative scenarios suggest possible annual notification costs (in the order of £3.9m to £18.2m) depending on how regulation is specified.
	One-off (Transition)	Yrs	
	£ Not identified	1	
	£ Not identified		
Total Cost (PV)			£ Not identified
Other key non-monetised costs by 'main affected groups' Costs to landlords of notifying water companies of tenant's information. Other key costs identified are the costs to water companies to enter data. Set up costs to water companies to improve back office systems for additional required data. Costs to water companies to facilitate easy transfer of data from landlords.			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' Not possible to accurately monetise benefits until regulation is specified. Illustrative scenarios suggest possible annual notification benefits (in the order of £5.3m to £26.6m) depending on how regulation is specified.
	One-off	Yrs	
	£ Not identified		
	Average Annual Benefit		
£ Not identified			
Total Benefit (PV)			£ Not identified
Other key non-monetised benefits by 'main affected groups' Reduced water bad debt in the industry, resulting in falling costs of financing bad debt and chasing bad debt. Improved fairness through reduced write-off costs reducing water bills for those that currently pay.			

Key Assumptions/Sensitivities/Risks The range of benefits 10% to 50% is indicative and will be refined later in the process. The range of costs is large because of uncertainties in time taken for notifications and the number of notifications required.

Price Base Year 2009	Time Period Years 20	Net Benefit Range (NPV) £ Not identified	NET BENEFIT (NPV Best estimate) £ Not identified	
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What is the geographic coverage of the policy/option?		England and Wales		
On what date will the policy be implemented?		2011		
Which organisation(s) will enforce the policy?		Water and sewerage companies		
What is the total annual cost of enforcement for these organisations?		unknown		
Does enforcement comply with Hampton principles?		Yes		
Will implementation go beyond minimum EU requirements?		N/A		
What is the value of the proposed offsetting measure per year?		£ unknown		
What is the value of changes in greenhouse gas emissions?		£ unknown		
Will the proposal have a significant impact on competition?		No		
Annual cost (£-£) per organisation (excluding one-off)	Micro unknown	Small unknown	Medium unknown	Large unknown
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)			(Increase - Decrease)	
Increase of	£	Decrease of	£	Net Impact
				£

Key: Annual costs and benefits: Constant Prices (Net) Present Value

[Use this space (with a recommended maximum of 30 pages) to set out the evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Ensure that the information is organised in such a way as to explain clearly the summary information on the preceding pages of this form.]

The Problem

1. Following privatisation of the water industry there has been significant increases in water and sewerage bills above the rate of inflation (42% in real terms) which means that water bills now account for a higher proportion of income. During this period there has also been an increasing number of customers falling into arrears or struggling to pay their water bills. The Citizen's Advice Bureau (CAB) reported a 28% rise in client cases specifically related to water debt between 2005- 2007/08.
2. In addition to higher water bills and general levels of indebtedness within the same period, the UK Government banned the disconnection of domestic private properties from their water supply in the Water Industry Act 1999. Consequently companies are statutorily required to supply domestic properties with water and therefore residents do not need to supply companies with contact details in order to secure water supply. Whilst the 1991 Act makes the occupier of a property liable for water bills, companies must rely on the information supplied to them by occupants. Without customers' details, water companies are unable to chase residents of a property for payment, or to pursue them for payments once they have left the property.
3. Since the ban on disconnection, the number of unpaid bills has increased by 17% and total debt related costs by 28%. By 2007 1 in 5 (19%) domestic customers were in arrears with their water company which is considerably higher than the 5% of electricity customers and 3.7% gas customers within the same period, especially taking into account of the relative affordability of water compared to energy. The water industry has seen a rise in bad debt by 38% in real terms since 1999. In 2008/9 the water industry had £1.40 billion of household revenue and wrote off £114m in the same period, which is the equivalent to 1.6% of revenue billed for that period (From Ofwat June Returns 2008/09).
4. There are a number of reasons why bad debt in the water industry is larger than that in the energy industry. However, evidence indicates (UKWIR (2006) Quantifying Different Types of Water Industry Debt. 06/CU/04/4) that the inability to identify tenants or pursue

occupants once they have left a property is responsible for a significant proportion of bad debt.

5. Because water companies have a statutory duty to supply domestic properties with water regardless of whether or not they receive payment for this service there is little incentive for occupiers of a property to provide their water company with details of their occupancy.
6. Consequently when a tenant leaves the property without having paid their water bill, a water company often has no information with which to trace the tenant and pursue them for payment. In this instance there is no penalty for non payment of a water bill. Nor can the water company bill anybody else for the outstanding revenue such as the tenant's landlord.
7. In addition to this, many water companies only send out bills every 6-12 months. This means that they may be unaware that a tenant has left the property and a new tenant has moved in. In the case of short term lettings, bills may not arrive to coincide with the timescale of tenants arriving at and vacating a property.
8. This issue was highlighted in the final report of Anna Walker's independent review of charging for household water and sewerage charges, which recommended that "*As a priority, the Water Industry Act 1991 should be amended to provide for a named customer and clarify who is responsible for paying the water bill*" (full document available at: www.defra.gov.uk/environment/quality/water/industry/walkerreview/documents/final-report.pdf).

Rationale for Government Intervention

9. Government intervention is necessary to deal with an information problem caused by regulatory failure. Water Companies have to seek payment from the occupier of a domestic premises, however, under current legislation there is no requirement for occupants to provide details to their water company and little incentive for them to do so given that they will be supplied with water regardless. When these occupants are tenants, rather than homeowners whose details can be obtained via the Land Registry, water companies cannot efficiently obtain the correct information to identify tenants if they do not provide details to the company, whether by design or oversight. Water companies therefore spend excess time and money chasing debt and attempting to identify and obtain payment for water bills where in some cases it will be impossible to

identify the liable bill payer. The cost of doing so is passed onto other water customers at a cost of approximately £12 per annum¹.

Policy Objective

10. Ministers want to legislate to require landlords to ensure the provision of details of the liable bill payer, failure to do so will mean that the landlord assumes liability . This will ensure that when a tenant leaves a property without paying their water bill, the water company is able to pursue the tenant for the unpaid bill. In addition to this, legislation will ensure that where no details are available of the occupier, the homeowner may be pursued for payment.
11. This will deter those customers who can afford to pay their bills from not paying them, i.e. identify those customers who are categorised as “won’t pay” as there will be financial (such as low credit score or possibly a CCJ against them) consequences of non payment.
12. By the landlord informing the company on change of tenant, the company can ensure that bills are sent to the occupier at an appropriate time to ensure that occupiers do not miss bills and subsequently payment. Ultimately we hope to reduce the cross subsidy paid for by other water customers.
13. In addition to this, because of the financial consequences and possible civil action taken against a customer for non payment, we hope to encourage customers with genuine affordability concerns to engage with water company in order to arrange repayment and/or assistance in paying their bills (via hardship funds or eligibility for the vulnerable groups tariff). Engagement with the Citizens Advice Bureau may further encourage customers with affordability concerns to contact their water companies and investigate entitlement to benefits. These consequences should similarly incentivise payment by customers who can pay.

Options

14. A range of options have been considered.

Options under consideration

15. Do Nothing – whilst customer debt continues to be listed as a notifiable item under Ofwat’s periodic review (the process by which Ofwat determines 5 yearly price limits for water companies. Full details of Ofwat’s most recent periodic review, PR09, can be found at: <http://www.ofwat.gov.uk/pricereview/>) other customers will continue to pay for this. If water bills continue to rise above the current rate of inflation, bad debt and consequently other customers’ bills will also increase. This option is not preferred.

16. Legislate to require landlords to provide details of a liable bill payer to water companies - using the current 5th session Flood and Water Management Bill (full details of this can be found at: <http://www.defra.gov.uk/environment/flooding/policy/fwmb/index.htm>), legislate to require landlords to arrange for the provision of prescribed information about the occupier, such as full name, date of birth, contact details, type and length of tenancy and previous address. Failure to supply details within a set timeframe would result in the landlord assuming responsibility for bill payment. Landlords or tenants who deliberately provide false information to water companies are in breach of the Fraud Act 2006. This option has strong support from a variety of stakeholders and has been agreed between Water UK and Landlord associations during the Walker Review, it is also a recommendation arising from the Walker Review. This is the preferred option.

Options considered and discarded.

17. Reverse the ban on disconnection, or allow trickle valves: Water is essential to human life and as such has been recognised as a basic human right by the United Nations. This option would be very controversial, facing much opposition from stakeholders and is completely incompatible with current policy. Either both total or trickle valve disconnection from water supply poses significant health risks to individuals, externalities in health and pollution as one property’s disconnection may affect neighbours properties. Government’s view is that *“the prohibition on domestic disconnection is vital to protect health and hygiene. Anyone who agrees with that statement must agree that devices which reduce the flow of water available for use to such a small trickle that it can take up to a quarter of an hour to fill the kitchen sink to enable washing-up to be done should be banned too.”*. This option is not acceptable.

18. Introduce penalties for customers who do not pay water bills: As is the case with Council Tax, we could amend primary legislation to make non payment of water bills and introduce penalties for non payment. In some respects, water as a utility is comparable to council tax in that a service is provided regardless of whether or not payment is received

by the service provider. However, local authorities are more able to collect information about owners and occupiers of residential properties because there is a legal duty to provide this information. Because of the difficulties water companies face in finding information about their customers and subsequent difficulties in differentiating customers classed as “won’t pays” from “can’t pays”, such an arbitrary measure would be inappropriate. We would not want to see customers with genuine affordability problems facing criminal action against them. This option is not preferred.

The Base Case

19. The base case is that water bills continue to increase above the rate of inflation and general levels of indebtedness also increase or remain at the same level. Customers will continue to fall into arrears in their bill payments and those who do not pay continue not paying bills. Bad debt in the industry will likely increase or remain at the same level with water companies still not knowing information about their customers and still unable to pursue customers for debts.

Costs and Benefits of Preferred Option

20. It is not possible to monetise the impacts of this policy until regulations are defined. We have provided possible costs and benefits for indicative scenarios for illustrative purposes. This is on the basis that greater evidence will be gathered and options defined during consultation for a cost benefit analysis.

21. These scenarios show that it is useful to examine this proposal further at consultation stage, but also highlight that options should be analysed carefully in later analysis and only the most cost-beneficial taken forward.

22. In this Impact Assessment The Department has estimated tenants are responsible for approximately 40% of industry debt. This is based on data from the UKWIR report (Quantifying Different Types of Water Industry Debt CU-04), showing the amount of debt in areas with a low to high percentage of rental housing. To estimate the proportion of debt associated with rental households the amount of debt in each group has been multiplied by the proportion of rental households (the mid-point of each band)., for the group with the highest proportion of renters we have used the lower bound estimate of the percentage of renters, as a conservative estimate. This provides a useful estimate of the potential amount of tenant debt to analyse potential benefits of the proposed legislation. It is important during consultation on regulations that the water industry is consulted and data collected to obtain a more robust estimation of debt attributable to tenants.

Benefits

23. Benefits of this policy option include greater fairness caused by the redistribution of the cost of water from paying customers to those who currently avoid payment and improved efficiency because of lower costs to water customers through lower resources spent when tracking down bad debt. There are three cost elements to bad debt, all estimated by Ofwat from June Returns 2008/09:-
24. Chase Costs: The expenditure of water companies to try and recover bad debt, estimated at £77m per annum.
25. Finance Costs: The interest payments water companies have to make on the money borrowed to cover the £1.4bn bad debt they hold, estimated at £70m per annum.
26. Write-off Costs: The amount of debt that water companies absorb as costs due to an inability to track down or enforce repayment of water debt, estimated at £115m per annum.
27. Reductions in costs will have benefits both in terms of fairness and efficiency. These are discussed below with reference to write-off, chase and finance costs.

Fairness

28. Write-off Costs - When debt is written-off companies will have to absorb the costs of the debt themselves. To do this it is assumed they will have to raise prices to paying customers, so that paying customers are subsidising the water that debtors use, for free, this can be considered a cross-subsidy. Therefore, reducing written-off debt should not be considered a net benefit but a transfer between groups, as one group gains, debtors, and another group loses, paying customers, Write-off costs are a large proportion of total costs as shown, above, therefore this policy is likely to result in a large reduction in bills for paying water customers, not included in net benefits.

Benefits

29. Chase Costs – Chase costs, often described as debt operating expenditure, are expenditures by water companies to track down debt, encourage customers to pay and take the necessary legal actions to enforce payment, if required. The cost of chasing bad debt adds to all water user bills, and therefore avoiding chase costs is a net benefit to society.
30. Finance Costs – The debt from unpaid water bills is held by water companies who effectively have to borrow from banks and therefore pay interest on the borrowed

amounts. Ofwat estimates the cost of interest payments borrowed at an interest rate 5% on £1.4bn of debt to be equivalent to around £70m per annum. Reducing debt will reduce the amount of debt that requires financing and therefore reduce interest payments. This will result in a reduction on all water bills, also, resulting in a net benefit to society.

31. Because of the large uncertainty in the level of tenant bad debt and the reduction in bad debt in this Impact Assessment we have provided a large range for the proportion reduction in bad debt, assuming that 40% of bad debt is from tenant debt. In informal discussions with industry it is considered that a reduction of 10%, 25% or 50% of bad debt is reasonable.

32. The estimated total costs of bad debt is £262m per annum. 40% of this is estimated to be due to tenant debt. The benefits from named tenants will not occur immediately but will reduce the amount of new tenant bad debt accumulated each year. This analysis assumes that the amount of new bad debt incurred each year is the same, and the costs associated with bad debt are equal to the amount of bad debt each year. Tenant bad debt accumulated will reduce by between 10% and 50% each year. After 5 years it is assumed tenant bad debt reaches the maximum reduction, this assumption will be refined in later analysis during consultation with water companies.

Table 1: Annual Benefits (£m) (2009 prices)

	Percentage reduction in tenant debt		
	10%	25%	50%
Year 1	1.2	3.0	5.9
Year 2	2.4	5.9	11.8
Year 3	3.5	8.9	17.7
Year 4	4.7	11.8	23.6
Year 5	5.9	14.8	29.5

33. Benefits have been estimated over 20 years in this case, as this policy does not involve investment in capital assets there is no well defined time period to estimate benefits. However, analysis for a period beyond 20 years would not affect the outcome of the analysis. Over this period the annual benefits if not discounted would be expected to be between £6.3m and £31.6m (2009 prices) based on the assumption of reductions between 10% and 50%. The Net Present Value (NPV) of these benefits including discounting would be between £75.4m and £377m in 2009 prices.

Table 2: Benefits (£m) (2009 prices)

		Percentage reduction in tenant debt		
		10%	25%	50%
Not Discounted	Average Annual (£m)	5.3	13.3	26.6
Discounted	20 yrs NPV (£m)	75.4	188.5	377.1

34. The benefits in this analysis do not take into account the very substantial increases in water debt in real terms, page 3. Including future growth in water debt in the baseline scenario would mean larger future benefits from the scheme, as this mitigates the build up of future bad debt, and therefore these benefits should be considered a conservative preliminary estimate.

Costs

35. Costs fall on 2 groups: Landlords, and housing associations. The additional costs to landlords will depend on whether they notify themselves or whether they go through a managing agent. Data suggests that landlords use a managing agent 60% of the time (<http://www.york.ac.uk/inst/chp/publications/PDF/prsreviewweb.pdf>).

36. The costs estimated result from the time taken by them to provide information, or to arrange for the provision of information, to water companies. This may depend on the method through which water companies require landlords to provide this information.

37. We have provided below some broad estimates of the possible costs of landlords actions using the Better Regulation unit model to determine costs. The model estimates the cost using the following formula:-

No of Actions x Time Taken per action x Wage Rate x Overheads Allowance

38. In this instance, the number of actions will be the number of times that landlords, managing agents and housing associations have to notify water companies regarding new tenant information.

39. The wage rate is estimated using BRE wage rates and is £16.23 for landlords, £8.28 for administrative staff (for Local Authority and Housing Association costs) and £12.70 for estate agents, in 2005 prices, these are equivalent to around £18.50, £9.46 and £14.50 in 2009 prices (increased to 2009 values using the Average Earnings Index). Overheads are estimated at an additional 30% of costs. Finally, the number of notifications is given for two scenarios, given below:-

- Notifications are only required for new tenants, estimated at around 1.83m in total: 1.3million for private landlords, of which an estimated 0.9 million would be via a managing agent, and 0.5 million for social renters.
- Notifications would be required for each tenanted property annually, estimated at 6.8 million in total, 3 million private renters and 3.8 million social renters, this is considered an upper bound estimate of the number of notifications required. Both statistics from (Housing Statistics 2009, CLG, <http://www.communities.gov.uk/publications/corporate/statistics/housingplaningstatistics2009>)

40. These scenarios are chosen to represent a reasonable estimate of the lower and upper bounds for the number of notifications that will be required. The lower bound scenario assumes regulations only require a named tenant and his moving in date and are therefore estimated from the number of annual number of moves into tenanted properties. The upper bound scenario assumes a more detailed notification procedure. This may require landlords to notify water companies of all changes to contracts and may require a notification annually by landlords, for extensions or changes to tenancies. The large number of tenancies leads to the higher costs.

41. For illustrative purposes, the time taken for a landlord to notify water companies is assumed to be 10 minutes, by telephone or via an internet based portal. This is also used as an upper bound estimate of time taken for housing associations and managing agents assuming systems are not made significantly easier by water companies, this will be consulted on with landlords during the definition of regulations. A lower bound, estimate of 5mins for time taken to notify water companies has been used for housing associations and managing agents assuming that systems are made available such as sending information in spreadsheets. These estimates will be revised during consultation stage with landlords and housing associations, when defining regulations.

42. These annual costs will start immediately as landlords will be required to notify water companies of new tenants information.

43. Table 3, below, details the calculations to estimate the total admin costs in 2009 prices.

Table 3: Admin Costs per notification (2009 prices)

Notifier	Time (minutes)	Labour rate (£/hr)	Wage Cost per notification (£)	Overhead Costs (30%) (£)	Total Admin Costs per Notification (£) (£)
Private Renter	10.00	18.5	3.1	0.9	4.0
Managing Agent	5.00	14.5	1.2	0.4	1.6
Social Renter	5.00	9.5	0.8	0.2	1.0

44. Table 4, below, details the total estimated costs given the data available.

Table 4: Estimated total annual costs of notifications

Cost Option	Notifier	No of Notifications (millions)	Total Admin Unit Costs (£)	Total Costs (£000) = Admin Cost x Population	Total Option Cost (£m) = Social Renter + Private Renter
Notifications for movers only	Private Renter	0.5	4.0	2,161.9	3.9
	Managing Agent	0.8	1.6	1,268.8	
	Social Renter	0.5	1.0	498.8	
Annual Notifications for all tenants	Private Renter	1.2	4.0	4,789.7	18.2
	Managing Agent	1.8	1.6	5,621.9	
	Social Renter	3.8	1.0	7,778.4	

Table 5: Costs (£m)

	Notifications (m)	1.8	6.8
	Time (mins)	10	10
Not Discounted	Average (£m)	3.9	18.2
Discounted	20 yrs NPV (£m)	57.8	267.6

Non-monetised costs

45. There will also be monetary costs to water companies, which have not been estimated, in terms of entering and referencing provided data. Further, there will be one-off costs to water industries to alter databases to include extra information on tenants. There may

also be costs in terms of contacting landlords in order to notify them of the changes and to ensure that all landlords are correctly notified to water companies.

46. A more refined estimation of costs will be undertaken when there is more information on the likely form of the regulations. However effort will be made to ensure that regulations are cost effective in this case during consultation.

Evaluation

47. This policy should allow accurate evaluation of the performance the policy proposed has had on reducing debt, data on water company debt is published annually in June Returns. The difficulty will be in delimiting the impact this policy has had on reducing debt given other actions taken by the water industry and other government policy, and even the performance of the UK economy. However, these should not be impossible obstacles to overcome and in subsequent Impact Assessments proper space should be given to evaluation of this policy in terms of performance in reducing bad debt.

Assumptions

- Tenant bad debt is responsible for 40% of water industry bad debt.
- Reductions in write off costs are not economic benefits but a transfer of costs from paying customers to those who previously avoided paying bills.
- The reduction in tenant bad debt will be in the range of 10%, 20% and 50% of bad debt.
- Costs based on notification will be for between 1.8m and 6.8m notifications.
- Time taken for notifications will be 10 minutes for private landlords.
- Time taken for housing associations and managing agents of contacting water companies of 5 minutes per notification for the lower end estimate, this shows the potential for significant time savings where water companies provide systems (e.g. housing associations sending notifications of new tenants in spreadsheets reducing costs.)

Conclusion

48. Policy option ii) has been decided on because it is the most effective option considered that will allow water companies greater scope to identify customers and recover costs by pursuing customers who have left properties without paying bills or by billing landlords where information is not provided. Identification of liable bill payers will also enable companies to bill customers at an appropriate time. In addition to this, we consider there are other possible financial and social benefits to water companies and customers in companies knowing their customer bases better, such as engaging with customers that have genuine affordability concerns.

49. Overall this analysis shows that there is the potential for significant benefits from the proposal, however the net benefit of this legislation will depend on the final regulations proposed and a stronger understanding of the possible benefits, consultation will be undertaken to ensure that any scheme proposed will be the most cost-beneficial.

Specific Impact Assessments

50. We have carried out a Small Firms Impact Test and whilst we do recognise that this will have some impact on small firms, we do not consider this to be disproportionate. We have considered how these impacts might be mitigated but it would be difficult to define how this might be achieved ahead of consultation on the regulations defining what information must be provided and the timescale for doing so. Given the fundamental importance of provision of details about individual tenants to the policy, we do not consider that exemptions would be appropriate.

51. We do not consider this policy to have any adverse effect on the environment, Legal Aid, health, equality, human rights, or rural areas. The limited extent of competition in the water and sewerage industries means there is unlikely to be any effect on competition.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	Yes	No
Small Firms Impact Test	Yes	No
Legal Aid	Yes	No
Sustainable Development	Yes	No
Carbon Assessment	Yes	No
Other Environment	Yes	No
Health Impact Assessment	Yes	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	Yes	No
Rural Proofing	Yes	No

