

MAPPA Policy

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Record of Amendments

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Amendments	
Revised to include reference to GDPR and Data Protection Act 2018	Section 2
Revised to include reference to GDPR and Data Protection Act 2018	Section 3.2
Revised to include reference to GDPR and Data Protection Act 2018	Section 5
Revised to include reference to Wheatley 360	Section 6.1
Revised to include reference to GDPR and Data Protection Act 2018	Section 6.4
Revised to include reference to MyHousing	Section 6.5
Deletion of reference to Scottish Government Shortlife Working Group to review Environmental Risk Assessment Process – this was concluded in November 2017	Section 6.6
Revised to include reference to GDPR and Data Protection Act 2018	Section 8

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1. Introduction

The Wheatley Group's (The Group) Multi Agency Public Protection Arrangements (MAPPA) Policy is part of a suite of policies within our Protecting People Policy Framework (PPPF). The PPPF is our Group wide approach to keeping our communities safe and provides us with a strong platform for sharing learning and best practice across all subsidiaries. The other policies within the framework are:

- Child Protection;
- Adult Support and Protection; and
- Domestic Abuse

The strategic aim of all policies within our PPPF is to ensure that: *we work with customers, staff and partners to make homes and lives better and safer for all and that we design and deliver services to minimise the risk of harm and abuse within our communities.*

Our ability to work with our communities to prevent and respond appropriately to their priorities will be key to achieving our Investing in our Futures (IioF) vision of cementing our reputation as one of the UK's leading customer focused organisations.

Our customers have told us that feeling safe and secure in their home and community is extremely important to them and this, in turn impacts on local demand and community stability. Our PPPF, and the suite of policies within it, support our customers' priority of feeling safe and defines our role in achieving that outcome.

We know that the public have a general fear of offending behaviour, and in particular sexual offences. Robust partnership arrangements for managing the potential risk these offenders pose will promote feelings of safety within our communities.

The number of sex offenders managed under MAPPA, across Scotland, has been gradually increasing year on year. As at 31 March 2016 there were 5,098 sex offenders in Scotland. This represents a 6% increase compared to 2015. The number of sexual crimes recorded by Police Scotland during 2015/16 was 10,273, representing an increase of 7% compared to the previous year.

The number of MAPPA offenders residing in Wheatley communities is mirroring the national upward trend. This highlights the importance of working effectively with partners to keep people safe and reduce the risk of harm.

The Group is committed to supporting partner agencies, who have the statutory responsibility for managing the risk posed by offenders who are managed under MAPPA, as we firmly believe that we should do all we can to ensure our communities are safe and protected from harm. As such this policy will detail the way in which we will design and deliver services to minimise the risk to our communities.

Through the development, implementation and monitoring of our MAPPA Policy, along with the other policies within the PPPF, we will define what it really means to keep our communities safe and set sector leading standards in Group Protection service areas.

This MAPPA Policy provides information to customers, staff and partners in relation to how we will work together to support and protect people in our communities. It

will focus more heavily on the management of registered sex offenders due to that being the largest category of offender managed under MAPPA.

2. What is MAPPA?

The Multi Agency Public Protection Arrangements (MAPPA) are a set of statutory partnership working arrangements introduced in 2007 by virtue of Sections 10 and 11 of the Management of Offenders etc (Scotland) Act 2005 (The 2005 Act).

The fundamental purpose of MAPPA is public protection and managing the risk of serious harm. MAPPA is not a statutory body in itself but is a mechanism through which the responsible authorities discharge their statutory responsibilities and protect the public in a coordinated manner.

The 2005 Act places a statutory duty on the responsible authorities in a local authority area to jointly establish arrangements for assessing and managing the risk posed by certain categories of offenders.

Responsible Authorities are: Police Scotland, The Local Authority (Criminal Justice Social Work), The Health Board and The Scottish Prison Service (SPS).

The 2005 Act also provides for agencies that have a duty to cooperate with the responsible authorities in relation to the management of offenders. Registers Social Landlords (RSLs) are named as duty to cooperate agencies. The duty to cooperate extends to information sharing requiring the two way cooperation between the responsible authority and duty to cooperate agency.

Our non RSL subsidiaries are not specifically named as having a duty to cooperate within The 2005 Act. Requests for information to non-RSL subsidiaries must be referred to the Group Governance Team who will consider the request in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

2.1 Categories of Offender Managed Under MAPPA

There are currently three types of offender who are managed under MAPPA. These are:

Registered Sex Offenders – those offenders convicted of an offence listed in Schedule 3 to the Sexual Offences Act 2003 and required to comply with sex offender notification requirement requirements (SONR) set out in part 2 of the 2003 Act. It also includes those made subject of a Sexual Offences Prevention Order (SOPO), or are convicted of a breach of Risk of Sexual Harm Order (RSHO).

The vast majority of offenders managed under MAPPA are those who are referred to as sex offenders. The number of sex offenders in Scotland has been increasing year on year. As at 31 March 2016 there were 5,098 sex offenders in Scotland (MAPPA Annual Report 2015/16). Sex offenders can, and do, reside in all tenures.

Mentally Disordered Restricted Patients - They are commonly referred to as restricted patients; this is a patient subject to any of the following orders or directions:

- Patients who are detained following conviction under section 57A and section 59 of the Criminal Procedure (Scotland) Act 1995;
- Patients who are detained under section 57(2)(a) and (b) of the Criminal Procedure (Scotland) Act 1995 Compulsion order with a Restriction Order following a finding of unfitness for trial or acquittal by reason of mental disorder; and
- Prisoners detained in hospital on a Hospital Direction under section 59A of the Criminal Procedure (Scotland) Act 1995 or a transferred prisoner on a Transfer for Treatment Direction under section 136 of the Mental Health (Care and Treatment) (Scotland) Act 2003.

Restricted patients are persons detained in hospital under a compulsion order with a restriction order. They have usually committed an offence punishable by imprisonment but as a result of mental disorder are not imprisoned but ordered to be detained in hospital for treatment, without limit of time. They are dealt with through a programme of treatment and rehabilitation - the aim being to prevent recurrence of offending by dealing with the mental disorder.

There are approximately 290 restricted patients in Scotland. Just over half are detained in the State Hospital with the remainder detained in local psychiatric hospitals or living in the community on conditional discharge. (Scottish Government website)

Treatment plans for restricted patients are geared to individual circumstances and reflect the health and safety requirements of the patient, issues in relation to victims and their families and public safety considerations.

The number of restricted patients in our communities is extremely small. Our RSL subsidiaries will most likely come into contact with restricted patients as they prepare to return to the community and wish to access our housing lists.

Other Risk of Serious Harm Offenders – offenders not required to comply with the SONR or a mentally disordered restricted patient, but who, by reason of their conviction, are subject to supervision in the community by any enactment, order, or licence, are assessed by the responsible authorities as posing a high or very high risk of serious harm to the public, which requires active multi agency involvement at MAPPA level 2 or 3 (see section 2.2).

This category only commenced on 31 March 2016. The number of offenders managed under this category is very low. Within the first 6 months of the commencement of the category there were 20 offenders across Scotland with 10 of those living in communities (Scottish Government).

2.2 Levels of Risk Management

There are 3 levels at which risk can be managed under MAPPA these are:

- Level 1: routine risk management (3,757)*;
- Level 2: multi-agency risk management (192)*;
- Level 3: Multi Agency Public Protection Panels (MAPPP) (1)*.

*(The number in brackets indicates the number of sex offenders managed at liberty at that level on 31 March 2016 across Scotland).

Level 1 management is not applicable to Other Risk of Serious Harm Offenders, as this category requires that a significant risk of serious harm exists which requires active multi agency management at MAPPA levels 2 and 3.

The adoption of the three management levels allows for a consistent approach to MAPPA. The risk management structure is based on the principle that cases should be managed at the lowest MAPPA level commensurate with delivering a defensible risk management plan designed to address the risk of serious harm posed by the offender.

Within each level, the responsible authorities must then determine the level of risk of serious harm posed by the offender, ie low, medium, high, very high.

2.3 Risk of serious harm is defined as; **the likelihood of harmful behaviour of a violent or sexual nature, which is life threatening and/or traumatic, and from which recovery, whether physical or psychological, may reasonably be expected to be difficult or impossible.**

2.4 For MAPPA purposes the imminence and likelihood of risk of serious harm is classified as follows:

- **Very high:** there is an imminent risk of serious harm. The potential event is more likely than not to happen imminently and the impact would be serious;
- **High:** there are identifiable indicators of risk of serious harm. The potential event could happen at any time and the impact would be serious;
- **Medium:** there are identifiable indicators of serious harm. The offender has the potential to cause such harm, but is unlikely to do so unless there is a change in circumstances, for example failure to take medication, loss of accommodation, relationship breakdown, drug or alcohol misuse; and
- **Low:** current evidence does not indicate likelihood of causing serious harm.

2.5 Both the level at which an offender is managed and their risk classification within that is dynamic and changes over time. If factors change which may affect the risk and the risk management planning of any offender in MAPPA then it is vital that there are effective information sharing arrangements and processes in place to ensure these factors can be taken into consideration by the responsible authorities.

2.6 The main way in which staff within the Group share information with the responsible authorities is via the dedicated link officer taking account of established information sharing arrangements and processes. For the Group this is the Group Protection Liaison Manager.

3. Policy Aims and Objectives

3.1 Our Aim

We will work with customers, staff and partners to make homes and lives better and safer for all. We will design and deliver services to minimise the risk of harm and abuse within our communities.

3.2 Our Objectives

We will achieve our aim and strategic vision by successfully implementing the following objectives across all subsidiaries:

- Where possible we will implement processes to **prevent** situations where harm may arise;
- We will ensure our policies and processes are **fit for purpose** and promote and support guidance contained within the national MAPPA Guidance and NASSO including guidance on information sharing arrangements;
- We will build robust **risk mitigation** processes into our policies, for example, we will further develop our allocation processes to, and around, high risk offenders, embedding this across our RSL subsidiaries;
- We will work in **partnership** with the responsible authorities to effectively discharge our obligations in our role as a duty to cooperate agency for RSL subsidiaries and proactively work to develop those relationships through regular partnership meetings;
- We will embed a culture of **early intervention** when sharing information relevant to managing the risk offenders pose, for example, if an offender begins to accrue rent arrears and their home is at risk, we will keep the responsible authorities advised at each stage of our escalation process;
- We will **raise awareness** of MAPPA and ensure everyone who is employed or involved in our organisation is aware of this. Leaders within the organisation will support and promote this;
- Our approach will strike the balance of being sufficiently **flexible** to ensure we have public protection at the heart of our processes while ensuring a level of consistency in the implementation of this policy; and
- We will develop **trend monitoring frameworks** and actively work with partners, where possible, to ensure our communities are not adversely disadvantaged in the housing of offenders;

Before we share personal information, we will consider all of the legal implications of doing so, in particular the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

4. Our Role

4.1 Duty to Cooperate – RSL subsidiaries

Our RSL subsidiaries, in their role as a duty to cooperate agency, do not themselves have responsibility for assessing and managing risk. Instead the role of RSLs is to contribute to the responsible authorities' management of risk by:

- Exchanging information on housing with the responsible authorities;
- Allocating housing that has been assessed as manageable;
- Liaising with the responsible authorities on their ongoing management and monitoring of the risk the offender may pose; and
- Having in place arrangements with the Sex Offender Liaison Officer and the other responsible authorities to deal with situations where a property is no longer.

4.2 National Accommodation Strategy for Sex Offenders (NASSO)

The clear and consistent advice from experts is that stable housing and effective monitoring make a key contribution to minimising the risk sex offenders under MAPPA pose. It is also recognised that sex offenders can and do reside in all tenures across Scotland. For that reason a guidance document specifically detailing the role of housing providers was developed.

NASSO forms part of MAPPA and explains how housing organisations contribute to those arrangements. In particular the NASSO focusses on assessing and managing the risks that sex offenders under MAPPA may pose by living in a particular community, location and property.

The Key principles the NASSO is founded upon are:

- Sex offenders under MAPPA cannot be excluded from housing. Blanket exclusion of such offenders is illegal (everyone over the age of 16 in Scotland has the right to be admitted to a housing waiting list or register), while their suspension from receiving offers of housing will undermine risk management arrangements by increasing the risk of an offender going missing;
- Social housing providers should not give sex offenders under MAPPA priority for housing merely because they are such offenders. But sex offenders may be allocated housing where the responsible authorities have assessed them as being a risk and providing housing would minimise the risk. Any decision to provide housing for a sex offender is in the context of managing risk and improving public safety; and
- Sex offenders under MAPPA should normally be housed in mainstream housing within the local authority area from which they originate, although exceptional circumstances may occasionally mean that arrangements are made to house an offender in other local authority areas.

(A short life working group has been convened by the Scottish Government, to review some elements of the NASSO. We will review our processes in line with any changes to the NASSO as appropriate).

5. Duty to Co-operate – RSL subsidiaries

We recognise that we will routinely share information relevant to managing the risk offenders pose, On the basis of information sharing arrangements, together with supporting processes and guidance, we will make an assessment whether to report our concerns to the appropriate responsible authority. This should not be used a substitute for calling police where there is a threat or risk of harm to our customers. When there is a threat or risk of harm this must always be reported to police by calling 101 or 999 depending on the circumstances.

Those employed or involved in our organisation have a responsibility to act to make sure a child, young person, or adult whose safety or welfare may be at risk is protected from harm.

If we are passing on concerns reported to us by a third party (eg neighbour) or disclosures by the victim, it is good practice to advise the person making the disclosure that concerns are being reported, but that may not always be possible.

If staff are in any doubt they should discuss this with their line manager or the Group Protection Liaison Manager.

The NASSO does make reference to private landlords stating that the provision of information to private landlords is a matter for the police who have discretion on a case by case basis. As non RSL subsidiaries are not specifically named as having a duty to cooperate within The 2005 Act, requests for information from non-RSL subsidiaries **must** be referred to the Group Governance Team who will consider the request in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

6. Designing and Delivering Services

lioF demonstrates our continued focus on providing excellent homes, services and products and the benefits of coming together as Wheatley to learn from our joint experience and expertise to implement our shared learning.

Some of the ways in which we will work to implement shared learning and good practice across Group, with the focus of minimising the risk offenders pose in our communities are detailed below:

6.1 Group Protection Liaison Manager

Within The Group we have a dedicated link officer (Group Protection Liaison Manager) who forms part of Wheatley 360: our wraparound support division that designs and facilitates the delivery of sector leading services *making homes and lives better from every angle*. The Group Protection Liaison Manager will work in partnership with the responsible authorities to keep our communities safe.

The Group Protection Liaison Manager has a dual focus of driving forward the strategic outcomes contained in lioF, creating the best solutions for all customers in relation to MAPPA. In addition to the strategic focus, there is also an operational focus responding to the management of offenders in our communities. This includes liaising with the Sex Offender Liaison Officers (SOLO) in each of the local authority areas where we have a presence.

6.2 Personalised Customer Service Outcomes

Our vision for 2020 is to deliver outstanding personalised customer service – putting our customers in control of how they engage with us by offering a unique service mix. In order to deliver excellent services for our customers we need to understand who our customers are and what services they need and want.

MAPPA offenders represent an increasing section of our customer base. We know they can face additional barriers in accessing services, for example, they may have court orders prohibiting them from accessing online services.

Through our appropriately differentiated range of products, that can be delivered to meet the needs of our customers, we can design and deliver service outcomes for

these customers, for example, restricted patients are detained in hospital and can have difficulty accessing our services in their preparation for discharge. For those customers we take our service to them, offering interviews in hospital, taking them through each stage of the process to access housing, and place notes on interest on properties on their behalf. The personalisation of this process greatly assists their rehabilitation and preparation for discharge.

6.3 W.E. Care

We recognise that while offenders can pose a risk in our communities, they themselves can be vulnerable and can also require support. Our unique W.E. Care model delivers a personalised service for all customers. The model focuses on maintaining and maximising well-being, safety and or self-reliance, supporting people through life transitions, managing risks and building lasting relationships.

We will draw down on this support as and when required to support our customers who are subject to monitoring under MAPPA.

Our specialist teams within Loretto Care will receive MAPPA Awareness Sessions to ensure, they are fully aware of the way in which their role can support the responsible authorities to manage the risk an offender poses.

6.4 Sharing Information

Under The 2005 Act, the responsible authorities have to co-operate with each other and with other key agencies placed under a duty to co-operate. The key agencies under a duty to co-operate include RSL subsidiaries. Our RSL subsidiaries do not assess and manage risks, but they do have to co-operate with those who do. The information our RSL subsidiaries hold are central to the assessment and management of risk. Co-operation includes, but is not restricted to, the exchange of information.

We will work with partners within MAPPA to develop and subsequently review detailed information sharing protocols under which the flow of information is to be managed to ensure each agency is clear about, and addresses their legal obligations, for sharing of information under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and other legislation. In addition, we will develop detailed supporting processes, procedures and guidance for our staff.

Our non RSL subsidiaries are not specifically named as having duty to cooperate within the 2005 Act. Requests for information to non-RSL subsidiaries **must** be referred to the Governance Team who will consider the request in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

6.5 Access to Housing

MyHousing, our Housing Information, Advice and Letting Platform asks if the applicant or any member of their household is a sex offender. There are processes in place to liaise with Sex Offender Liaison Officers when housing applications are received.

Restricted patients will generally access our housing lists as they near discharge from hospital. The relevant referral forms ask if the applicant is a restricted patient

and provides guidance for staff completing the forms (the number of restricted patients accessing our waiting lists is extremely low).

Environmental Risk Assessments are undertaken on any potential offer of housing where a sex offender or restricted patient forms part of the household composition. If the responsible authorities advise they would be unable to manage the risk posed by the offender at that particular address then the offer will not proceed.

On occasion when the offender poses a particular risk or there are concerns with specific areas, a housing options interview will be undertaken to discuss realistic and safe housing prospects.

In order to ensure our housing lists are as accessible as possible, the Group Protection Liaison Manager supports any sex offenders in temporary accommodation to make notes of interest on properties where a referral under section 5 of the Housing (Scotland) Act 2001 has been accepted. The Group Protection Liaison Manager will also support any restricted patients who wish to make notes of interest.

6.6 Allocation of a Property in Close Proximity to an Offender

Once an offender has moved into a property that has been assessed as manageable, an alert will be added to the property to highlight additional checks that will be required when another property in close proximity becomes void.

We acknowledge that we cannot control 100% of allocations in close proximity to offenders, for example, if a neighbouring property is privately rented or owned. We also acknowledge that we cannot control certain changes in circumstances within neighbouring households, for example, a tenant moves a friend or partner into the tenancy or the tenant becomes pregnant. In this scenario, where possible we will highlight the change in circumstances as timeously as possible; at the very latest it will be highlighted during the annual review of the address.

6.7 Existing Tenants who Become Subject to MAPPA

When an existing tenant is convicted and becomes an offender managed under MAPPA we will share information with the responsible authorities in relation to surrounding households in accordance with our protocols, processes and guidance. If the responsible authorities do not assess the current property as manageable, we will work with both the responsible authorities and the offender to engage our housing options model. We will actively work to find a solution, for example, source alternative accommodation where the offender's risk can be managed.

6.8 Promotion of the Sex Offender Community Disclosure Scheme (Keeping Children Safe)

The Keeping Children Safe scheme was introduced across Scotland in 2011 and is managed by Police Scotland. The scheme encourages members of the public to apply for information about an individual who has access to a child if they are concerned that the individual poses a risk to a child's safety and wellbeing. Work is being undertaken to enhance the public profile of the scheme to ensure that it remains a key contributor to the protection of children. We will fully support this work.

7. How we will Know we are Making a Positive Impact on our Customers Lives and in our Communities

We will know we are making a positive impact on our customers' lives and our communities when:

- Our communities are safer places through our implementation of processes to proactively mitigate risk;
- Our staff are confident in dealing with all aspects of MAPPA ensuring we are fulfilling our duty to cooperate function;
- We have appropriate pathways and referral systems in place to ensure customers are getting the right support at the right time, first time; and
- We are realising the vision and outcomes contained within our Investing in our Futures Strategy.

8. Legislation and Strategic Drivers

This policy framework has been developed taking into account relevant legislation and guidance:

Legislation

- Management of Offenders etc (Scotland) Act 2005;
- Children (Scotland) Act 1995;
- Children and Young People (Scotland) Act 2014;
- Adult Support and Protection (Scotland) Act 2007;
- Abusive Behaviour and Sexual Harm (Scotland) Act 2016;
- Housing (Scotland) Act 2001;
- Housing (Scotland) Act 2014;
- General Data Protection Regulation (Regulation (EU) 2016/679)
- The Data Protection Act 2018

Strategic Drivers

- MAPPA Guidance; and
- National Accommodation Strategy for Sex Offenders

9. Policy Review & Consultation

We will review this policy every three years. Reviews will consider legislative, performance and good practice changes.

More regular reviews may be considered where, for example, there is a need to respond to new legislation / policy guidance or any recommendations from significant case reviews.

We have developed this policy in consultation with key stakeholders. Similar consultation will take place for all proposed policy reviews.

10. Support, Procedures, Awareness and Training

To enable us to protect the most vulnerable people in our communities, all staff will be made aware of the existence of this policy, their responsibilities and the benefits of delivering this policy.

Training needs of staff across the organisation will be informed by insight from My Contribution (The Group's skills analysis and employee performance review tool).

Where skill gaps are identified, training by both external partners and key internal personnel will be provided for MAPPA and wider Group Protection issues throughout our network of Academies.

Regular blogs will be added to Wheatley Group Intranet Systems to ensure staff awareness levels are maintained.

Staff will be supported by our W.E. Solutions Support Services and supplied with clear written pathways, a quick reference guide and a detailed toolkit on how and where to report concerns.

Clear leadership and accountability mechanisms will be established, these will be complemented with robust governance arrangements.

11. Performance Monitoring and Reporting

During the first year of this policy we will establish our baseline and from there develop a Performance Monitoring Framework.

We will use trend analysis from the Performance Monitoring Framework to inform our future allocation of resources and identify training and support needs.

12. Confidentiality and Data Protection

Those employed or involved in our subsidiaries have a responsibility to act to make sure that a child, young person or adult whose safety or welfare may be at risk is protected from harm.

In certain circumstances (and subject strictly to conditions set out in the Data Protection Act 2018, General Data Protection Regulations and any other applicable data protection legislation) personal information may be shared by the Group with other organisations and partners. Before the Group can share personal information it must consider all of the legal implications of doing so, not simply the terms of applicable legislative requirements. Appendix 3 of Wheatley Group Data Protection Policy must be considered.

Once a decision has been made as to whether or not information should be shared,

that decision must be recorded, together with the reasoning behind that decision. Where a decision was taken to share the information, this will be on a “need to know” basis and an audit trail must be kept.

Staff members must consult the Wheatley Group Data Protection Policy and if in doubt will seek advice from the Group Information Governance Team.

13. Engagement and Communication

Within the Wheatley Group we have Communities of Excellence (CoE) which consist of various members of staff from across the Group. Our CoE networks are at the heart of our Group wide ecosystem of innovation, generating learning ideas from across Group and learning from other sectors.

One of the key ways we will engage and communicate with staff in relation to this policy is through the Protecting Communities CoE. Through the CoE we will develop effective feedback loops between frontline staff and senior management. This will be the main channel for open and effective communication on the implementation of the policy. Any blockages hindering the delivery of this policy will also be addressed through the CoE.

One of the main interdependencies for the MAPPA Policy is our Information, Advice and Letting Policy Framework. The Allocations Performance, Policy and Practice Community of Excellence will be the main driving force to review and update our policies to housing, and managing allocations around, offenders managed under MAPPA. Regular MAPPA updates will be included in the Allocations Bulletins: our main internal communication method updating staff on key changes or issues affecting allocations.

14. Complaints

Our aim is to get it right first time, however, where there is dissatisfaction with this policy or its operation, customers can make a complaint.

A summary of our Complaints Policy and Procedure is available on our website and in local offices.