

Domestic Abuse Policy

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Record of Amendments

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Amendments	
Revised Definition of Domestic Abuse and inclusion of Coercive and Controlling Behaviour	Section 2
Revised wording to reflect creation of Wheatley 360 and revised roles	Section 6
Revised to include GDPR and Domestic Abuse (Scotland) Act 2018	Section 8
Revised to include GDPR	Section 12

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1. Introduction

The Wheatley Group's (The Group) Domestic Abuse 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
- Multi Agency Public Protection Arrangements (MAPPA)

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 domestic abuse has been and continues to be a significant problem in our communities. There were 59,541 incidents of domestic abuse reported to Police Scotland during 2017/18. Of these incidents, 80% of the victims were female with a male perpetrator, 16% were male victims with a female perpetrator, 2% were both male and 1% were both females. The age group with the highest incident rate was 26-30 year olds.

This, without doubt, still under estimates the problem, as Police Scotland believe that they are only made aware of approximately 21% of all domestic abuse incidents.

Whilst the true scale of domestic abuse in our communities will always be hard to measure. We do know that it happens in all communities, respective of tenure or socioeconomic profile. While women and girls are disproportionately affected, it can and does occur regardless of gender, age, disability, gender reassignment, race, religion or belief, sexual orientation or relationship status (marriage, civil partnership, partners or ex partners).

We have endeavoured to quantify the impact of domestic abuse in our communities by undertaking analysis of Police incidents using the Wheatley Business Intelligence Toolkit. Analysis of Police incidents over the 24 week period (25th April 2016 – 10th October 2016) shows that there were 1,138 domestic incidents reported to Police, either in or within 25 metres of our properties (excluding Dunedin Canmore and Barony). It is the main reason for Police to call at our properties. In 23% of these incidents the victim was male; this is slightly higher than the national figure.

As the sector leading housing and care provider we are well placed to recognise the signs of domestic abuse. If we want to deliver our vision of providing excellent customer service, it is absolutely essential that we take all reports of domestic abuse

seriously and work positively and proactively with the victim / survivor to offer person centred support.

In addition, we recognise that we have an important role to play in assisting perpetrators of domestic abuse who wish to positively change their behaviour by helping them to access support and assistance.

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

This Domestic Abuse Policy provides information to customers, staff and partners in relation to how we will work across our subsidiaries and with partners to support and protect people in our communities who are affected by domestic abuse.

2. What is Domestic Abuse?

There is a common misconception that domestic abuse is just physical abuse. This is not the case. Domestic abuse can be physical, sexual, financial, emotional or mental abuse. Coercive and controlling behaviours, some of which are described in Section 2.2, underpin domestic abuse; they are a range of purposeful behaviours including intimidation, isolation, emotional abuse and manipulation. These behaviours are often the mechanisms for achieving power and control in an abusive relationship and reinforce the threat or reality of physical abuse.

2.1 Definition of Domestic Abuse

For the purposes of this policy we will use the Police Scotland and Crown Office and Procurator Fiscal Service nationally agreed definition of domestic abuse:

'Any form of physical, verbal, sexual, psychological or financial abuse which might amount to criminal conduct and which takes place within the context of a relationship. The relationship will be between partners (married, cohabiting, civil partnership or otherwise) or ex-partners. The abuse may be committed in the home or elsewhere including online'.

2.2 Examples of Domestic Abuse

Domestic abuse can take a number of different forms, some of which are listed below, with examples of behaviours associated with each one:

Physical abuse includes: All types of assault and physical attacks like hitting (including with objects), punching, kicking and burning.

Sexual abuse includes: Forcing their partner or ex partner to engage in sexual intercourse or forcing them to engage in sexual acts.

Mental/emotional abuse includes: Threats (including threats of violence); criticism and name calling; controlling what the victim does, where they go and who they speak to; threatening their children, isolating them from friends and family; accusing them of being unfaithful; threatening to 'out' their sexual orientation to family, friends

or work or to reveal their HIV/AIDS status; or threats to post non consensual intimate media online (often referred to as revenge porn).

Financial abuse includes: Controlling money and bank accounts; making a victim account for all their expenditure; running up debts in a victim's name; allowing no say on how monies are spent; refusing to allow them to work

Stalking includes: Unwanted attention or behaviour for example, telephone calls, texts or more threatening behaviour, such as appearing at victim's homes or workplace unannounced or unwarranted.

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 support those affected by domestic abuse.

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 domestic abuse could occur, for example making referrals to Police under the Disclosure Scheme for Domestic Abuse Scotland;
- We will ensure our policies are **fit for purpose** and promote the wider prevention activity at both a local and national level;
- We will build robust **risk mitigation** processes into our policies, for example, we will ensure our Information, Advice and Letting Policy Framework supports those affected by domestic abuse;
- We will work in **partnership** with relevant organisations and proactively work to develop those relationships with the vision of creating strategic partnerships;
- We will embed a culture of **early intervention**. For example, our housing officers and environmental operatives have intimate knowledge of our communities and are therefore in a unique position to be alert to early indications of domestic abuse within a household;
- Through our Investing in Our Futures Strategy we will continue to inspire and empower our staff to develop **innovative solutions** to support our individual customer's needs;
- We will **raise awareness** of domestic abuse and ensure everyone who is employed or involved in our organisation is aware of the importance of responding appropriately and supporting our customers. Leaders within the organisation will support and promote this;
- Through our ground breaking **W.E. Care** approach we will ensure we are in a unique position to access support for all customers, not just the needs of those in traditional care groups; and
- Our approach will strike the balance of being sufficiently **flexible** to ensure we have our customers' at the heart of our processes while ensuring a level of consistency in the implementation of this policy.

4. Our Role

Our role as a leading housing and care organisation, in responding to domestic abuse, is predominantly awareness and identification, followed by support to the customer in a way that responds to their needs. In certain circumstances it may also be appropriate to report our concerns to Police Scotland and / or the relevant Local Authority Social Work Department (see section 5. Reporting Concerns).

As soon as we are alert to possible abuse within a household it is extremely important that our response is appropriate. We may become aware of domestic abuse from a number of sources, these include:

- Disclosure by the customer;
- Disclosure by a third party;
- Identification by a member of staff; or
- Identification through customer insight from ASTRA

Regardless of how we become aware of the domestic abuse we will obtain as much information as possible (if it is safe to do so) in order to inform our response and take any necessary action. Anyone who approaches us and discloses they are affected by domestic abuse can expect the following response:

- Our starting point will be that we will believe them;
- A victim's disclosure alone is sufficient for them to be given advice and assistance as a matter of priority for staff;
- We will signpost and actively refer to specialist support agencies;
- We will offer suitable interview provisions including accessible venue, same sex interviews and translation service if necessary;
- We will ensure that anyone experiencing domestic abuse is treated in a sympathetic, supportive and non-judgemental way; and
- All disclosures of abuse will be treated confidentially, the key exception to this being situations where there is reason to believe that there may be a risk of harm to others. We will reassure the customer and explain why the information must be shared.

5. Reporting Concerns

5.1 Within Wheatley we have developed Community Information Reports. It is the mechanism through which we share information / intelligence with Police Scotland through defined procedures. While this is actively encouraged, it 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 should be reported to Police by calling 101 or 999 depending on the circumstances.

If we are passing on concerns reported to us by a third party (e.g. 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.

Details of other circumstances where staff should report concerns to Police Scotland and / or Social Work, are detailed below:

5.2 Bail Conditions

Bail conditions are imposed by the courts in order to minimise any potential future risk of harm that perpetrators may pose as a result of their alleged violent offending behaviour.

It is the responsibility of Police Scotland to enforce any domestic abuse bail conditions relating to perpetrators. They do this by carrying out unannounced visits to places from which they are excluded, or places they are required to be. Police will also conduct regular enquiries to ensure perpetrators do not make contact with anyone specifically named in bail conditions.

In the event that any member of staff becomes aware of breach of bail, our priority is the safety of the victim. Should we become aware of a breach of bail or potential breach of bail this will be reported to Police immediately either via 101 or 999 depending on the circumstances.

5.3 Non Harassment Orders (NHO)

An NHO is a court order which can be granted against the perpetrator, their family or any third party behaving in a way that frightens the victim or causes them distress. It orders them not to commit certain actions (for example following the victim, repeatedly e-mailing, phoning or texting, sending letters, unwanted and unsolicited gifts, e.g. flowers).

There are two ways that a non-harassment order can be obtained:

- In a civil court; or
- Upon conviction in a criminal court.

Breach of an NHO is a criminal offence. In situations where we become aware of breach of an NHO, this will be reported to Police immediately via 101 or 999 depending on the circumstances.

5.4 Children

The National Guidance for Child Protection Scotland (2014) highlights domestic abuse as an indicator of risk with children and young people living with domestic abuse being at increased risk of significant harm: both as a result of witnessing abuse and being abused themselves. Children can also be affected by abuse even when they are not witnessing or being subjected to abuse themselves. Domestic abuse can profoundly disrupt a child's environment, undermining their stability and damaging their physical, mental and emotional health.

In situations where we become aware of domestic abuse in a household, and children form part of that household composition, we will assess whether to report any concerns to Social Work / Police as appropriate in line with our Child Protection Policy.

5.5 Adult Support and Protection

In some situations, those affected by domestic abuse may also meet what is commonly referred to as 'the three point test' to be deemed an adult at risk under the Adult Support and Protection (Scotland) Act 2007. An adult at risk of harm is any person aged 16 or over who:

- Is unable to safeguard their own wellbeing, property, rights or other interests;
- Is at risk of harm; and
- Because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

Where we have concerns an adult may be deemed an adult at risk we will assess whether to report our concerns to Social Work / Police Scotland as appropriate in line with our Adult Support and Protection Policy.

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. We will use Wheatley 360: our wraparound support division, to design and facilitate delivery of sector leading services. This will be achieved by working in partnership with key agencies to keep our communities safe.

Some of the ways in which we will do this are detailed below:

6.1 Group Protection Liaison Manager

Within The Group we have a dedicated officer (Group Protection Liaison Manager) who forms part of our Wheatley 360 wraparound support division.

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 domestic abuse. In addition to the strategic focus, there is also an operational focus responding to the management of domestic abuse within our communities. This includes liaising with key partners in each of the local authority areas where we have a presence.

6.2 Personalised Customer Service Outcomes

Our vision for 2020, contained in lioF, 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. Through our appropriately differentiated range of we can design and deliver service outcomes for these customers.

By engaging with our customers to help them feel more in control of how and when they access support and improving access to information they need to make better decisions, we will improve their perception of value. We know that helping people feel more in control contributes to improving resilience, health and wellbeing outcomes.

We will build staff skills around domestic abuse so that every interaction with a customer affected by domestic abuse should feel personal and should capture individual priorities for that customer as we know there is no such thing as a universal customer.

6.3 W.E. Care

Our unique W.E. Care model delivers a personalised service for all customers. The model focuses on maintaining and maximising wellbeing, safety and or self-reliance, by 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 affected by domestic abuse

We know that flexibility, in any support model for those affected by domestic abuse, is extremely important as they often seek help or try to leave on more than one occasion before finally ending the relationship. The inbuilt flexibility of our W.E. Care model allows us to recognise and respond effectively to the challenges people affected by domestic abuse face. Through our unique approach we will ensure self-reliance and control can be facilitated and maintained when it is right for the individual; safe in the knowledge that if they do stay or return to their partner that they can easily re-engage at any time.

Our specialist teams within Loretto Care's Tenancy Support Service (a key component of our W.E. Care model) can play an important role in supporting customers affected by domestic abuse. The service is designed to provide short-term, low-level support to help customers who are vulnerable, at risk, or in crisis to develop the skills they need to make a success of their tenancy.

6.4 Use of Intelligence

Our ground breaking use of intelligence enables us to be alert to potential signs of domestic abuse within households. Intelligence can come from a number of sources; some of these are discussed in more detail below:

ASTRA (Our Group CRM)

The successful introduction of our ASTRA platform has transformed our service delivery and depth of customer insight. All information relating to customer contacts is held in one place (repairs, housing options, rent etc.). The insight gained from ASTRA allows us to deliver real value to individual customers by targeting and tailoring services that are focussed on their particular needs. We are in a unique position as a landlord to be alert to abuse within households. This could be sudden unexplained rent arrears (potential indication of financial abuse), or customers requesting lock changes.

Business Intelligence Toolkit

We have worked with Police Scotland to develop a Wheatley specific Business Intelligence Toolkit (BIT). The BIT is designed to monitor emerging trends by tracking levels of specific crime types including domestic crimes and incidents from the preceding 24 weeks. The BIT also contains specific detailed data on date, time, and day of the week. The BIT intelligence is used by the Community Improvement Partnership (CIP), to provide a detailed picture of the nature and extent of domestic incidents (and other forms of violence and disorder) by Subsidiary and Area Housing Office (AHO). The data from the BIT is then used to influence and inform the future deployment and use of CIP resources and interventions.

Interventions may include:

- targeted days of action with Police colleagues in our Community Improvement Partnership; or
- Proactive offender management of repeat offenders in our communities;

Customer Conversations

Our staff are in regular contact with our customers for a variety of reasons, for example, our environmental operatives who operate a 24 hour a day / 365 days a year service in our multi storey sites, housing officers in customers' homes, our wraparound support services delivering services. All of these interactions can afford the opportunity to gather additional soft intelligence that could indicate a customer is affected by domestic abuse.

6.5 Partnerships

We recognise that we cannot effectively support our customers, delivering preventative and early intervention services without strong partnership working at local level. We work in partnership with a number of key agencies and participate in multi-agency forums, some of these are listed below:

- Violence Against Women Partnership;
- Multi Agency Tasking and Co-ordinating Meetings (MATAC) actively targeting perpetrators;
- Multi Agency Risk Assessment Conferences (MARAC) to share relevant information and thereafter safety plan for high risk victims of domestic abuse; and
- Disclosure Scheme for Domestic Abuse Scotland (DSDAS) Decision Making Forums. (See section 6.9).

In addition to existing partnerships we will develop new ones to assist us in supporting those affected by domestic abuse. For example, we are currently working with Police Scotland's strategic lead for domestic abuse, exploring more proactive information sharing methods with Police Scotland around special bail conditions.

It is our ambition to enter into strategic partnerships with key partners to further develop our response to domestic abuse during the life of this policy.

6.6 Housing Options and Solutions

Our housing options model is now embedded into our processes and is very much considered business as usual. During the life of this policy we will work with colleagues to further develop staff knowledge of housing options, wraparound supports and pathways available for accessing specialist support to those affected by domestic abuse

For anyone who leaves an abusive relationship (whether victim or perpetrator) we will ensure their transition to their new home is as seamless as possible supporting customers with all aspects of the move and beyond:

Finding a home:

Flexible approach in the application of our Information, Advice and Letting Policy Framework in order to provide priority and

choice and recognise the negative impact domestic abuse has on our customers.

Moving into a new home: Drawing down on wraparound supports such as Home Comforts; Benefits Advisors; Money Advice; Fuel Poverty Advisors; Loretto Care Tenancy Support.

Creating and sustaining a new life: Support to access employability programmes; referral to specialist support agencies; re-engagement with support at any time.

6.7 Home Security

Evidence from research tells us that not all victims of domestic abuse want to leave their homes. Often simple security measures can make them feel safer and allow them to remain in their home with minimal disruption to the children.

We will create a bespoke service for our customers who are victims of domestic abuse (and antisocial behaviour). Where appropriate, this service may include the deployment of pioneering security measures to allow people to feel safer in their homes and assist with tenancy sustainment.

Our joint venture with City Building and our in-house repairs service within Dunedin Canmore provides an ideal platform to deliver this service offering by providing the necessary expertise to install identified security measures. These can range from simple measures, such as fitting mail guards to letter boxes where there is a fire risk, to more complex solutions for example, creating panic rooms in customers' homes.

6.8 Foundation Officers

Wheatley Foundation, is the Wheatley Group's charitable trust. Our Foundations Officers within Wheatley Foundation find creative ways and develop innovative to support our customers and their communities. Over the lifetime of this policy, we will work with Foundation Officers to consider explore external funding opportunities to allow us to support our customers affected by Domestic Abuse.

6.9 Promotion of the Disclosure Scheme for Domestic Abuse Scotland (DSDAS)

DSDAS was rolled out across Scotland on 1st October 2015. It aims to prevent domestic abuse by empowering both men and women with the right to ask about the background of their new partner. It also allows concerned members of the public, such as relatives, friends, or other agencies, to make enquiries about someone's partner if they are concerned that person has been abusive in the past. If a disclosure is deemed necessary, lawful and proportionate, the person potentially at risk, or person best placed to safeguard that individual, will receive the information.

The scheme also creates a formal mechanism for Police Scotland to tell both men and women, who are potentially at risk of abuse from their partner, about that partner's past.

The scheme aims to enable potential victims to make an informed choice on whether to continue the relationship, and provides further help and support to assist the potential victim when making that choice.

We will actively promote this scheme amongst staff and customers.

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

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

- Our communities are safer places for all, with our customers being confident in our response and feeling supported;
- Our staff are confident in dealing with all aspects of domestic abuse, being alert to signs of abuse;
- We have appropriate pathways and referral systems in place to ensure customers are getting the right support, at the right time, first time;
- We have a bespoke service offering pioneering security measures to allow our customers affected by domestic abuse to feel safer in their homes;
- Our customers affected by domestic abuse have real choice in the options available to them;
- We have a unique recording system to allow us to track our interventions when supporting customers affected by domestic abuse and the impact these have on our customers' lives; and
- We are realising the vision and outcomes contained within Investing in our Futures.

8. Legislation and Strategic Drivers

This policy has been developed taking into account the legislation and strategic drivers relevant to domestic abuse:

Legislation

- Matrimonial Homes (Family Protection) (Scotland) Act 1981
- Family Law (Scotland) Act 1985
- Protection from Harassment Act 1997
- Family Law (Scotland) Act 2006
- Protection from Abuse (Scotland) Act 2001
- Adult Support and Protection (Scotland) Act 2007;
- Criminal Justice and Licensing (Scotland) Act 2010
- Domestic Abuse (Scotland) Act 2011
- Abusive Behaviour and Sexual Harm (Scotland) Act 2016;
- Antisocial Behaviour etc. (Scotland) Act 2004;

- Domestic Abuse (Scotland) Act 2018;
- General Data Protection Regulation (Regulation (EU) 2016/679);
- The Data Protection Act 2018;
- Housing (Scotland) Act 2001; and
- Housing (Scotland) Act 2014.

Strategic Drivers

- Equally Safe, Scottish Government Strategy 2016. The Scottish Government in association with COSLA and other partners have agreed a commitment to preventing and eradicating violence against women and girls. This is contained within Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls. One form of violence against women and girls is domestic abuse. Equally safe does not exclude men but rather recognises that women and girls are disproportionately affected by particular forms of violence.

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 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 skills gaps are identified, training by both external partners and key internal personnel will be provided for domestic abuse 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 framework 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 Group Protecting People Policy Framework. Any blockages hindering the delivery of this policy framework will also be addressed through the CoE.

We will ensure close linkages with two of our other CoE networks within the Group:

- Our Allocations CoE to ensure our work around supporting victims of domestic abuse is reflected in our Advice, Information and Letting Policy Framework; and
- Our newly developed Care Virtual Centre of Excellence that has 4 associated CoE's one of which focuses on Technology Enabled Care as there are close links to this group and our pioneering home security measures.

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.