

Complaints Policy	
Approved by Board	Issue number 15.1
Approved date February 2026	Review date February 2027
Previous Version N/A	Responsible Officer Director of Corporate Services

1.	Aims and Objectives
1.1	Hightown Housing Association (Hightown) aims to provide excellent services to all customers and to treat all customers fairly
1.2	We recognise that sometimes things go wrong, and there will be occasions when our customers are dissatisfied and wish to complain. When this happens, we will try to address and resolve the complaint as quickly as possible to the satisfaction of the customer.
1.3	Hightown welcomes complaints as an opportunity to improve and develop services. We are committed to learning from customer feedback and proactively use this to drive service improvements.
1.4	This policy aims to support our teams to resolve matters locally, as quickly as possible, by adopting the Housing Ombudsman's Dispute Resolution Principles of: <ul style="list-style-type: none"> • Being fair • Putting things right • Learning from outcomes
1.5	Complaints will be recorded, response times monitored, and outcomes analysed. We will also review patterns and themes of complaints, diversity characteristics of complainants where the data is available, and monitor access and outcomes.
1.6	Staff handling complaints should make reasonable adjustments in the implementation of this policy, where required, to meet the needs of customers. Any such adjustments made to meet the needs of a customer will be clearly recorded.

<p>1.7</p> <p>1.8</p>	<p>This policy should be read in conjunction with Hightown's Higher Risk Building Safety complaints policy, Compensation Policy, Complaints Handling Procedure, Equality and Diversity Policy, Unacceptable Complainant Behaviour Policy, General Needs Vulnerable Residents Policy, Anti-Social Behaviour Policy, Customer Service Policy (including Customer Charter) and the Responding to MP and Councillor Enquiries Procedure.</p> <p>Hightown reserves the right to use discretion when applying this policy and may deal with a complaint differently where the individual circumstances merit it. Any discretion will be applied fairly and appropriately; complaints should be progressed as far as possible to maximise the opportunity to resolve the dispute. Authority to manage a complaint outside of the Complaints Policy rests with the Director of Corporate Services.</p>
<p>2.</p> <p>2.1</p> <p>2.2</p> <p>2.3</p> <p>2.4</p> <p>2.5</p> <p>2.6</p> <p>2.7</p> <p>2.8</p> <p>2.9</p>	<p>Definitions and Scope</p> <p>This policy applies to all staff.</p> <p>Complaints received via MPs or Councillors may not be dealt with under this policy if they are considered to be general enquiries or service enquiries. In such cases, the procedure for responding to MP and Councillor enquiries will be followed.</p> <p>A complaint is defined as "An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents".</p> <p>The customer does not have to use the word "complaint" in order for their expression of dissatisfaction to be treated as such under this policy. If an expression of dissatisfaction is received, with no reference to 'complaint' the customer will be asked if they wish to raise this as a formal complaint</p> <p>For the purposes of this policy, the term "customer" refers to an individual who falls into the category of persons entitled to make a complaint in point 2.11 below.</p> <p>Complaints made to the Development team regarding defects will be managed under this policy. Hightown as clients will liaise with Developers regarding complaints and utilise their complaints process as necessary.</p> <p>In Disrepair claims, the complainant can still access the complaints process as Alternative Dispute Resolution under clause 4.2 of the Pre-Action Protocol for Housing Repair Claims.</p> <p>Complaints relating to building safety in Hightown's Higher Risk Buildings will be managed under the Higher-Risk Building Safety Complaints Policy. Higher Risk Buildings are defined as a building that is at least 18 metres in height or has at least 7 storeys and contains at least 2 residential buildings.</p> <p>Where a property is managed by Hightown on behalf of another Housing Association, the arrangements for making complaints under the management agreement will be made clear to customers.</p>

2.10	<p>Complaints can relate to:</p> <ul style="list-style-type: none"> • Failure in quality of service • Delay or failure to respond • Disagreement with a decision • A matter of Hightown’s policy or procedure not being followed • Dissatisfaction with the way a member of staff has dealt with an issue, including being treated unfairly • Dissatisfaction with a third party/contractor acting on behalf of Hightown • Building Safety (higher-risk buildings)
2.11	<p>The following people are entitled to make a complaint under this policy:</p> <ul style="list-style-type: none"> • A current Hightown Tenant, Leaseholder, Shared Owner, Licensee or Person we Support, or someone who has a lawful “arrangement to occupy premises” • A former Hightown Tenant, Leaseholder, Shared Owner, licensee or Person we Support (if under twelve months since the issue or incident occurred) • An applicant for housing in any property, of any tenure, owned or managed by Hightown • C&SH Persons we Support who do not live in a property owned by Hightown • A non-legal representative/advocate of any of the above where Hightown has received their express authorisation for that person to pursue a complaint on their behalf (for example a friend or family member) • A non-legal representative of any of the first four people above who does not have capacity to authorise a representative to act on their behalf • A person with the legal capacity to make a complaint on behalf of any of the first three people above who is deceased (the Executor or Administrator of the estate). • Any person can make a relevant complaint in relation to Higher Risk Buildings.
2.12	<p>Expressions of dissatisfaction from people not included in the list above will be responded to as correspondence, with an explanation that the matter is not subject to Hightown’s complaints policy but will be looked into and appropriate follow up action taken.</p>
2.13	<p>Complaints about the conduct of a member of staff will be investigated by an appropriate manager. Details of any subsequent disciplinary or capability processes will not be disclosed to the complainant.</p>
2.14	<p>The following matters are <u>not</u> classed as complaints under this policy:</p> <ul style="list-style-type: none"> • The issue or the complainant becoming aware of the issue giving rise to the complaint occurred more than twelve months prior to the complaint being made, however exceptional individual circumstances can be considered as per point 2.18 • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim having

been filed at Court. (Except in Disrepair claims – see point 2.7 above).

	<ul style="list-style-type: none"> • An expression of dissatisfaction received through a survey response is not defined as a complaint, however, Hightown will provide details on how to complain in all surveys. • Matters that have already been considered under this policy. • Anonymous complaints will be reviewed where possible.
2.15	<ul style="list-style-type: none"> • <u>Service Requests</u> Routine service requests (for example, request for repair) are not treated as complaints and will be managed under the relevant operational process as set out in Hightown Resident Handbook and Customer Charter. The Complaints Team will accept a complaint where a service request is not managed in line with our policies or prescribed standards.
2.16	<ul style="list-style-type: none"> • <u>Anti-Social Behaviour</u> Dissatisfaction relating to anti-social behaviour (ASB) caused by Hightown residents or their visitors. These matters will be dealt under a separate ASB policy and procedure. The Complaints Team will accept complaints where the issue concerns Hightown's failure to follow, or properly manage, the ASB process.
2.17	<p>Hightown will not take a blanket approach to excluding complaints, and will consider the individual circumstances of each complaint, including those not classed as complaints, before refusing to consider and will provide an explanation where it does not consider the complaint to be a complaint</p>
2.18	<p>Hightown will apply discretion to accept complaints outside of the twelve months timeframe where there are good reasons to do so.</p>
2.19	<p>A complaint will be raised if a resident expresses dissatisfaction with Hightown's response to their service request, even if the handling of the service request is ongoing. Hightown will continue to address the service request where a complaint is made.</p>
2.20	<p>Hightown will accept a complaint unless there is a valid reason not to do so. Where a matter is not eligible to be considered under this policy, a detailed explanation will be provided setting out the reasons why the matter is not suitable for the complaints process and signposting to the Housing Ombudsman Service.</p>
2.21	<p>Where a customer has made a complaint which is being investigated under Hightown's formal complaints process, they may provide additional information regarding the issue where applicable. However, additional unrelated matters will not be added to an existing complaint. Where an unrelated matter meets the categories of complaints outlined above, these will be logged and investigated as a separate complaint and will not delay the response to the first complaint logged.</p>

3.	Making a Complaint
3.1	Hightown will make it as easy as possible for customers to complain and provide different channels through which a complaint can be made. Complaints can be made in person, phone call, verbally or in writing, including by email and social media (where Hightown has a profile).
3.2	The Hightown Complaints Policy is available on the Hightown website and can be requested by contacting Hightown in person, by phone, verbally or in writing and email. Information regarding the Ombudsman Code of conduct, including Hightown's annual assessment are available on the Hightown website. These can be requested as above.
3.3	Hightown will adhere to the requirements of the Equality Act 2010 and consider any reasonable adjustments needed, where appropriate, to support customers to access and go through the complaints process. This includes making the complaints policy and leaflet in an accessible format.
3.4	A complaint can be raised in any way with any member of staff. All staff are made aware of the complaints process and will pass the complaint on to the Complaints and Resolution Team to deal with the complaint.
3.5	Where complaints are received via social media, the Communications team will alert the Complaints and Resolutions Team to log the complaint and make direct contact with the complainant, where they can be identified, and manage the complaint outside of the social media channel. If the customer cannot be identified, we will encourage them to make a complaint directly to us.
3.6	Petitions may be treated as a complaint under this policy where the majority of the signatories to the petition fall into the category of persons entitled to make a complaint (see 2.11), and where a lead petitioner has been identified. Complaint responses will be addressed to the lead petitioner with the understanding that they will disseminate the response to the other signatories.

4.	Complaints Process
4.1	All Hightown complaints are initially handled at Stage One and if the customer remains dissatisfied and requires it to be further reviewed this will be handled at Stage Two of the complaints process.
4.2	When a complaint is made, we will log it on the Complaints Log at Stage One and acknowledge within five working days, setting out a definition of the complaint and the customers desired outcome. This will include asking the customer to clarify and advise if their complaint has been misunderstood. The five working days will be counted from the working day after receipt.
4.3	If the complaint escalates to Stage Two, we will update the Complaints Log with the date of receipt and acknowledge within five working days, setting out a definition of the complaint and the customers desired outcome. This will include asking the customer to clarify and advise if their complaint has been misunderstood. The five working days which will be counted from the working day after receipt.

4.4 The Complaints process is as follows:

Stage	Complaint investigated by and responded to by	Response times (counted from the working day following receipt or escalation of complaint)
Stage One (First Stage)	<p>All complaints from Hightown tenants, shared owners and leaseholders, by, Complaints and Resolution Officers, supported by Department Manager/s or Head of Service.</p> <p>Complaints relating solely to care service provision provided by C&SH or the complainant is a C&SH Person we Support without a Hightown tenancy, by C&SH Operations Manager</p>	We will acknowledge and define your complaint in 5 working days and provide our full response in 10 working days following the acknowledgement.
Stage Two (Final Stage)	<p>All complaints from Hightown tenants, shared owners and leaseholders, by Complaints and Resolution Manager supported by department Head of Services / Director.</p> <p>Complaints relating solely to C&SH care service provision provided by C&SH or the complainant is a C&SH Person we Support without a Hightown tenancy, by C&SH Operations Manager</p>	We will acknowledge and define your complaint in 5 working days and provide our full response in 20 working days following the acknowledgement.

4.5 If it is not possible for a Stage One or Stage Two complaint to be responded to within the timescales above, an explanation will be given to the customer and an extension to the response deadline detailed. The contact details for the Housing Ombudsman Service will also be provided as the customer has the right to approach the Housing Ombudsman Service where a complaint response is delayed. Any extension to a complaint response timescale must not exceed a further 10 working days for Stage One or 20 working days for Stage Two without good reason. Hightown will agree with the customer suitable intervals for being updated on their complaint, when the response timescale is extended.

4.6 At the completion of each of the two stages of the complaints process we will write to the customer advising them of the following:

- The complaint stage
- Definition of the complaint.
- The outcome of the complaint
- The reasons for any decisions made
- The details of any remedy being offered to put things

	<p>right</p> <ul style="list-style-type: none"> • Details of any outstanding actions • Details of how to escalate the matter if the customer remains dissatisfied
4.7	Complainants are not required to explain their reasons for requesting to escalate their complaint to Stage Two.
4.8	All complaints will be responded to in writing, addressing all points in the complaints and providing clear reasons for any decisions. Where the customer has requested a verbal response, this will be given and confirmed in writing.
4.9	An interpreter or other relevant support in making a complaint will be provided upon request. The Complaints policy can also be requested in accessible format.
4.10	Where the investigation into the complaint confirms that there has been a service failure, we will take reasonable steps to put it right. Consideration will be given to the Ombudsman's Guidance on Remedies. Where appropriate, the staff member should refer to Hightown's Compensation Policy.
4.11	Any remedy offered as a result of the complaint will reflect the extent of any and all service failure, and the level of detriment caused to the customer as a result. These will include: <ul style="list-style-type: none"> • Acknowledging where things have gone wrong • Providing an explanation, assistance or reasons • Apologising • Taking action if there has been a delay • Reconsidering or changing a decision • Amending a record or adding a correction or addendum • Changing policies, procedures, or practices
4.12	Throughout the complaints process, the customer shall be given a fair opportunity to: <ul style="list-style-type: none"> • Set out their position • Comment on any adverse findings before a final decision is made
4.13	At no stage is a response to a complaint or actions arising out of that response to be taken as legal advice or a statement of the customer's legal position. If the customer requires clarity regarding their legal position, they will be advised to seek their own independent legal advice.
4.14	The complaint response, at both stages, is provided to the customer when the answer is known, not when all outstanding actions are completed. Updates to outstanding actions will be provided to the customer.

5.	External Remedies
5.1	Customers who remain dissatisfied following completion of Hightown's internal complaints process may refer their complaint to an external agency.

5.2	Hightown will publicise details of external avenues for complaint resolution in leaflets and on our website.
5.3	<u>The Housing Ombudsman Service</u>
5.3.1	Hightown will provide residents with information on their right to access the Ombudsman Service and give details on how they can engage with the Ombudsman regarding their complaint.
5.3.2	The Housing Ombudsman Service offers a dispute support approach which actively supports landlords and customers to find a resolution between themselves within the landlord's procedure. Customers and landlords can contact the service at any time while a complaint is going through the internal process for advice and to help find a resolution.
53.3	<p>The Housing Ombudsman will not usually consider complaints that have not already been through the internal complaints process. Customers wishing to refer their complaint to the Housing Ombudsman Service can do this directly following receipt of Hightown's final response.</p> <p>There may also be occasions when the circumstances of the complaint or the customer fall outside of the legal jurisdiction of the Housing Ombudsman, and therefore they are unable to consider the complaint. The Housing Ombudsman Service is able to advise customers if this is likely to be the case.</p>

5.3.4 Hightown will provide early advice to complainants regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the internal complaints process is exhausted.

5.3.5 The Housing Ombudsman Service can be contacted as follows:

Housing Ombudsman Service

PO Box 1484

Unit D

Preston

PR2 0ET

Telephone: 0300 111 3000

Email: info@housing-ombudsman.org.uk

Website: <https://www.housing-ombudsman.org.uk>

5.4 First Tier Tribunal (Property Chamber)

5.4.1 Shared Owners and Leaseholders may apply to the First-tier Tribunal (Property Chamber) for leasehold disputes, or if statutory consultation procedures have not been correctly followed.

5.4.2 Information about the First Tier Tribunal (Property Chamber) can be found on www.gov.uk at:
<https://www.gov.uk/courts-tribunals/first-tier-tribunal-property-chamber>

5.5 Care and Supported Housing

5.5.1 Care and Supported Housing customers receiving services which are funded by the County Council, Clinical Commissioning Group, or Health Trust may contact the relevant organisation if they are not satisfied with Hightown's response to their complaint about the care and support services provided.

5.5.2 The Local Government and Social Care Ombudsman may consider complaints related to adult social care which have completed Hightown's internal complaints process.

5.5.3 Where regulated activity is delivered, the complainant may escalate their complaint to the Care Quality Commission.

5.5.4 Details on who to approach will be provided upon request, following completion of Hightown's internal complaints process.

<p>5.6</p> <p>5.6.1</p> <p>5.6.2</p>	<p><u>Building Safety Regulator</u></p> <p>A complaint related to Building Safety in Higher Risk Buildings can refer their complaint to the Building Safety Regulator if</p> <ul style="list-style-type: none"> • the complainant does not feel able to make a complaint to Hightown Housing Association • the complainant does not feel able to raise their concerns with Hightown <p>Relevant Complaints can be referred to the Building Safety Regulator with the complainant's consent if:</p> <ul style="list-style-type: none"> • the complainant is not satisfied with the final response from Hightown as the Principle Accountable Person • an agreement cannot be reached between the PAP and the AP • the complainant has unresolved issues in relation to the complaint • Hightown does not provide a response to the complaint
<p>6.</p> <p>6.1</p> <p>6.2</p> <p>6.3</p> <p>6.4</p> <p>6.5</p>	<p>Monitoring, reporting and learning from complaints</p> <p>All complaints will be centrally logged on the Complaints Log for monitoring compliance with this policy.</p> <p>High volumes of complaints are not seen as a negative, as they can be indicative of a well-publicised and accessible complaints process.</p> <p>The Complaints and Resolution Team meets quarterly with service Managers and Heads to review learning from complaints. The Complaints and Resolution Manager is responsible for assessing any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.</p> <p>The Annual Report to Residents will include information on the number of complaints received, lessons learned, and changes made to service provision as a result of complaints.</p> <p>The Complaints and Resolution Manager will report monthly on the number of complaints received and escalated, and the service areas to which the complaints pertain. In addition, the Head of C&SH will provide details of C&SH care services complaints. The Executive Leadership Team monitors the monthly reports, which are also electronically available for Board members.</p>

<p>6.6</p> <p>6.7</p> <p>6.8</p>	<p>The Operations Committee and Member Responsible for Complaints (MRC) receive quarterly and annual reports produced by the Complaints and Resolution Manager, on complaints performance, which includes:</p> <ul style="list-style-type: none"> • Updates on the volume, categories and outcomes of complaints, alongside complaints handling performance • Reviews of issues and trends arising from complaint handling • lessons learned from complaints and changes made or proposed amendments to policy so that the learning is embedded. • Updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders • Annual complaints performance and service improvement report <p>The Board receives an annual complaints performance and service improvement report.</p> <p>The Complaints and Resolution Manager completes an annual submission to the Housing Ombudsman Service, including Hightown's self-assessment against the Complaints Handling Code and Annual Report and Service Improvement Plan. The annual report and service improvement plan is presented to Board before submission for approval and comment.</p>
<p>7.</p> <p>7.1</p> <p>7.2</p>	<p>Legal/Regulatory Background</p> <p>This policy has been developed in accordance with the following relevant legislation and best practice guidance:</p> <ul style="list-style-type: none"> • The Localism Act 2011 • The Housing Act 1996 (schedule 2) • The Equality Act 2010 • The Housing Ombudsman's Complaints Handling Code • The Regulator of Social Housing's Consumer Standards • Data Protection & Privacy Policy • The Social Housing(Regulation) Act 2023 <p>Information about customers will be collected, stored and used in accordance with Hightown's Privacy Notice for Residents, which can be found on the Hightown website.</p>
<p>8.</p> <p>8.1</p> <p>8.2</p> <p>8.3</p>	<p>Resident Involvement</p> <p>The Complaints Scrutiny Group, made up of residents and staff, meet quarterly to review how complaints not related to C&SH care services have been handled, to identify any trends and to recommend any further changes to working practices or policies that have not already been instigated as a result of complaints received.</p> <p>The Residents Voice and Scrutiny Panel will receive information regarding complaints six monthly.</p> <p>Complaints relating to Care and Supported Housing are reviewed by service users at quarterly Voicebox meetings.</p>

<p>9.</p> <p>9.1</p> <p>9.2</p> <p>9.3</p> <p>9.4</p> <p>9.5</p> <p>9.6</p>	<p>Role and Responsibilities/Authority</p> <p>The Operations Committee is responsible for monitoring complaints. The Chair of the Operations Committee is the Member Responsible for Complaints (MRC) for the purposes of the Housing Ombudsman's Complaints Handling Code.</p> <p>The Director of Corporate Services has overall responsibility for this policy to ensure complaints are managed effectively and reported to the Board.</p> <p>The Head of Governance & Company Secretary acts as the Complaints Officer and will oversee complaints handling, including liaison with the Ombudsman and ensuring effective reporting through the governance structures. The Complaints Officer will also ensure that disputes are resolved promptly and fairly and encourage a culture of learning from complaints.</p> <p>The Complaints and Resolutions Manager is responsible for leading and developing Hightown's Complaints and Resolution service to include liaison with the Housing Ombudsman Service, ensuring that complaints are recorded, escalated, investigated and responded to in line with the policy.</p> <p>All Directors and Service Managers are responsible for working in collaboration with the Complaints and Resolutions Team to support complaint investigations relating to their departments.</p> <p>Other roles and responsibilities for the day-to-day management of complaints are set out in the Complaints Handling Procedure.</p>
<p>10.</p>	<p>Policy/document References:</p> <p>Compensation Policy</p> <p>Higher Risk Buildings Complaints Policy</p>

Unacceptable Complainant Behaviour Policy

1.0 Introduction

- 1.1 Hightown is committed to providing excellent services and to dealing with complaints fairly and impartially. However, on rare occasions a customer may conduct themselves in a way that is unreasonable or unacceptable.
- 1.2 A customer who is forceful or persistent when pursuing a complaint will not necessarily be considered to be acting in an unacceptable manner, and the circumstances of the complaint will be taken into consideration. However, the behaviour of some customers may be such that they are acting in an unreasonable manner or making unreasonable demands.
- 1.3 Unacceptable behaviour may be verbal, in person, physical or written.
- 1.3 This policy outlines the way in which Hightown will manage unacceptable behaviour from customers when making complaints.

2.0 Definitions of unacceptable behaviour

- 2.1 Examples of unacceptable behaviour include (this is not an exhaustive list):
 - 2.1.1 Aggression, threats or abuse: e.g. threats, intimidation, physical aggression, derogatory remarks, inflammatory statements, personal insults, or multiple unsubstantiated allegations.
 - 2.1.2 Unreasonable demands: e.g. unrealistic response deadlines, persistent contact (calls/letters/emails/voicemails), insistence on seeing or speaking to a particular member of staff.
 - 2.1.3 Repeated requests for information that it is not reasonable to expect Hightown to provide (for example information Hightown does not have access to, or personal information regarding another individual).
 - 2.1.4 Making an excessive number of complaints or requests for information.
 - 2.1.5 Providing such a volume of supporting information that would take up an unreasonable amount of staff time to deal with.
 - 2.1.6 Persistent refusal to accept explanations relating to what Hightown can or cannot do, or refusal to accept valid documents.

- 2.1.7 Continuing to pursue a closed complaint, or a complaint to which the customer has received a final response under Hightown's complaints process.
- 2.1.8 The customer refuses to use a single point of contact where advised.
- 2.1.9 The customer makes complaints about individuals to multiple other bodies and/or individuals before the outcome of, or regardless of the outcome of, the complaints procedure.

3.0 Managing Unacceptable Complainant Behaviour

- 3.1 Authority to manage a complaint outside of the Complaints Policy rests with the relevant Director or the Chief Executive.
- 3.2 The way in which unacceptable complainant behaviour will be managed depends on its nature and extent.
- 3.3 If the complainant's behaviour adversely affects our ability to do our work and provide a service to others, we may restrict their contact with staff or the method in which they may contact us. Wherever possible, we will do this in a way which still allows the customer to follow our complaints procedure.
- 3.4 Threats of violence, actual violence, or harassment towards any member of staff will not be tolerated. Hightown reserves the right to end all direct contact with the customer in these circumstances, and the matter will be reported to the Police where appropriate. Hightown may also take legal action or enforcement action under the tenancy agreement or lease.
- 3.5 We may not deal with communication in any format which is abusive to staff, or which contains allegations that lack substantive evidence.
- 3.5.1 In the case of repeated unsubstantiated allegations against staff that have been investigated, we may seek legal advice about appropriate proportionate action in accordance with our responsibilities towards staff members.
- 3.6 We will inform the customer in writing of any measures we are putting in place, and the reasons for doing so. Such measures may include:
- Arrangements where only designated staff deal with the customer's calls or correspondence
 - Requiring the customer to communicate with us in writing only
 - Returning documents to the customers, and/or advising that any further irrelevant documents will be destroyed
 - Acknowledging receipt of letters/emails on the subject but not entering into further discussion
 - Filing letters/emails on the subject with no acknowledgement
 - Barring the customer from Hightown's premises
 - Requiring a written agreement from the customer to be in place regarding any future communication

- Any other action that we consider appropriate.

3.7 A written explanation of the reason(s) for the measures taken and the period for which they apply will be provided and made available in other formats upon request. The explanation will emphasise that the action is not punitive but is being put in place to enable an equitable use of Hightown's resources for all its customers, and where applicable, to protect staff carrying out their duties.

3.8 Any arrangement put in place will be reviewed after twelve months if the period of its implementation is not shorter than this.