

Practice number	Practice 113.1
Practice title	Responding to reports of homelessness or nuisance behaviours

Practice purpose:

To guide Town staff on responding to reports of people experiencing homelessness in the Town.

Practice definitions:

Homelessness

The Australian Bureau of Statistics (ABS) definition states 'that when a person does not have suitable accommodation alternatives, they are considered homeless if their current living arrangement:

- is in a dwelling that is inadequate;
- has no tenure, or if their initial tenure is short and not extendable; or
- does not allow them to have control of, and access to space for social relations.'

Australian researchers Chamberlain and Mackenzie (1992) in their *Understanding Contemporary Homelessness: Issues of Definition and Meaning*, have defined homelessness as:

- a) Primary Homelessness: People who live in improvised dwellings. This includes people who sleep on the street, in parks, derelict buildings or cars;
- b) Secondary homelessness: People who live in temporary accommodation. This includes people in emergency or short-term homeless services and people residing temporarily with friends or family;
- c) Tertiary Homelessness: People who live in accommodation without a lease or the private use of bathroom or kitchen facilities. This includes people in medium to long term boarding houses or caravan parks.

Rough sleepers

Rough sleepers is the term used to describe people experiencing primary homelessness. For example, people who are sleeping without shelter, in locations that are not designed for habitation, in parks or other public areas, or in sheds, in their cars or other areas surrounding private buildings.

Anti-social Behaviour

Anti-social behaviour, as defined by Western Australian Police, is behaviour that disturbs, annoys, or interferes with a person's ability to go about their lawful business.

Public Area

A public area is any space that is open and accessible to the general public. Examples of public areas include parks, squares, and streets.

Town Facility

Town Facilities include the Town's administration building, Library, Leisurelife and Aqualife centers, the rangers' building, the depot building and any other Town owned buildings.

Private Property

Private property is property owned by non-government entities. This includes private residences and businesses.

Crown Land and State Government Land

Crown Land is land owned by the State or Commonwealth Government. When dealing with reports of homelessness on Crown Land or State Government owned land, the land should be treated as private property, if the land is not managed by the Town. The agency responsible for the management of the land should be notified, in addition to the Department of Communities Office of Homelessness. Crown land under management order to the Town will be managed as Town land for the purposes of this management practice.

Please see appendix for instructions on identifying land tenure and associated responsibilities.

Practice statement:

Practice principles

1. Town staff are expected to align with the policy principles contained within Policy 113 Homelessness – The Town’s role when responding to reports of people experiencing homelessness in the Town:
 - a. **Compassion:** The Town recognises that people who are homeless are some of the most vulnerable and disadvantaged people in our community, and that homelessness may have been caused by extended periods of disadvantage or as a result of a single life event. The Town will show compassion and care when interacting and working with people experiencing homelessness in the community.
 - b. **Respect:** The Town will have due regard for the feelings, needs and rights of people who experience homelessness.
 - c. **Inclusiveness:** The Town encourages and promotes inclusive access to public spaces and amenities, acknowledging the rights of people experiencing homelessness, whilst also acknowledging the responsibility of all community members to respect the rights of others to live in a safe and peaceful environment.
 - d. **Right to housing:** The Town recognises that access to housing that is affordable, secure and appropriate is a basic human right, essential to individuals’ mental and physical wellbeing and necessary for community members to meaningfully participate in society. The Town has a responsibility to understand acute housing needs, including homelessness, and to work collaboratively among all stakeholders to address local housing needs.
 - e. **Partnerships and Collaboration:** The Town acknowledges that ending homelessness requires a committed, whole-of-community response. The Town will work in partnership and collaboratively with all levels of government, homeless support services, business, community organisations and neighbouring local governments towards a coordinated, effective, and evidence-based approach to ending homelessness in the local community and the greater inner-City region.
 - f. **No wrong door:** The Town acknowledges that people experiencing homelessness or at risk of homelessness often connect with the Town. The Town is committed to implementing a ‘no wrong door’ approach to ensuring people in need are not turned away and are provided with the information and support to access services to meet their needs.

Practice response

2. The practice responses guide Town staff on their responsibilities in order to comply with the following policy commitments contained within Policy 113 Homelessness – The Town’s role:
 - a. Clause 7. The Town will play an active role in homelessness prevention through providing information on services, resources and facilities to assist people who are experiencing homelessness or at risk of homelessness.
 - b. Clause 9. The Town will proactively ensure public spaces and amenities are safe and inclusive for people experiencing homelessness.
 - c. Clause 10. Subject to compliance with any requirements of privacy legislation and confidentiality, the Town will collect and share accurate data, including utilising the By Name List to understand, monitor and respond to trends regarding homelessness in the community.

Reports of rough sleepers or left belongings

CRM category CRM categories identified in steps

Action officers Customer Service Teams

Special interest officers Safer Neighbourhoods Officer

1. Report of Rough Sleeping – Questions for the customer

Response 1

Is anyone in danger?

e.g. Is the person acting aggressively or violently? Does the person appear to be suffering from a mental health crisis?

1. If the customer says yes, advise them to call the police immediately on 000. The police have the ability to intervene and/or direct individuals into mental health services. No CRM action is required.
2. If other non-life-threatening activities are taking place, such as alcohol or drug use, advise the customer to call the police on 131 444 for general attendance.
3. If the customer says no to either, please continue to Response 2.

Response 2

What is the location of concern?

Task/Follow up questions

Public Area

Create CRM category 'Rangers – Rough sleeper/homelessness – Public area'

1. Is it an individual or group of people?
2. How long have they been there?
3. Thank customer and advise that the Town's Rangers will make contact with the person/s to provide information and support to access services.

Town Facility

Create a CRM category 'Rangers – Rough sleeper/homelessness – Town facility'.

1. Is it an individual or group of people?
2. How long have they been there?
3. Is the property a private/residential building or a commercial building?
4. What is the condition of the property – e.g., is there any damage, broken windows, etc.?
5. Thank the customer and advise that the Town will make contact with the property owner. However, advise that the Town is limited in its ability to take any action and encourage the customer to call the WA Police Force.

Private Property

Create CRM category 'Community Development – Rough sleepers/homelessness – Private property.'

2. Report of left belongings

Create CRM category 'Rangers – left belongings' and record any information provided by the customer that may be related to the potential owner

3. Report of begging

Provide additional information to customer on Town approaches to begging, anti-social behavior, rough sleeping, and left belongings as appropriate, using the below table:

- a. Advise customer that begging is not against the law, and that the Town works with local service providers to assist people who beg into accessing services.
- b. Advise customer that aggressive, intimidating, or violent behaviour is a criminal offence, and if they have witnessed this behaviour, to call the police immediately on 000 if an emergency or 131 444. No CRM action is required.

Community education

Begging	<p>As the Town's Albany Highway district has a high flow of foot traffic, some people choose to use the area to beg.</p> <p>Some people who beg may be homeless, while others may have access to stable accommodation but are from low-income households.</p> <p>Begging is not against the law. However, the Town works with local service providers to assist people who beg into accessing services.</p> <p>Aggressive, intimidating or violent behaviour is a criminal offence. If you have witnessed this behaviour, call 000 if an emergency or 131 444.</p>
Anti-social behaviour	<p>Anti-social behaviour is a criminal offence.</p> <p>Antisocial behaviour is any behaviour that disturbs, annoys, or interferes with a person's ability to go about their lawful business. This includes, but is not limited to, public alcohol consumption, drug use and dealing, aggressive/intimidating or violent behaviour.</p> <p>If you have witnessed any anti-social behaviour, call 131 444 or 000 if an emergency.</p>
No evidence of sleeping	<p>Public spaces are open and accessible to the whole community.</p> <p>The Town does not take any action where people are using parks for recreational purposes.</p>
Ranger response to rough sleeping – public areas and Town facilities	<p>The Town does not have the authority to 'move on' rough sleepers.</p> <p>The Town's Rangers make contact with rough sleepers to provide information and support to access services to meet their needs.</p> <p>Where possible, the Town will also refer the person to a homeless outreach service.</p>



	<p>In most cases, rough sleepers tend to move on, of their own accord after contact with the Rangers and/or a homeless outreach service within 14 days.</p> <p>The Town will involve the police if:</p> <ul style="list-style-type: none"> • The rough sleeper is experiencing a mental health crisis, as the police have the ability to direct individuals into mental health services • There is evidence of anti-social behaviour – e.g. drug/alcohol use or aggressive/violent behaviour • The rough sleeper refuses to leave the area, and has erected semi-permanent structures, demonstrating an intent to camp or remain in the area for an extended period of time
Ranger response to rough sleeping – private property	<p>The Town does not have the authority to ‘move on’ rough sleepers, in public areas or on private property.</p> <p>The Town will make contact with the property owner to alert them to the rough sleeper.</p> <p>Any action taken is at the discretion of the property owner.</p>
Ranger response to left belongings	<p>The Town’s Rangers investigate left belongings as soon as possible. If unattended Rangers will leave information on local support services, and a sticker advising that the items will be removed in 48 hours.</p>
Ranger response to sleeping in cars	<p>The Town’s Rangers will make contact with the person/s sleeping in their car to provide information and support to access services to meet their needs.</p> <p>If the car parked is contravening a Parking Local Law, Rangers will request compliance in a manner relevant to the contravention. Further contraventions may be subject to enforcement action.</p>

Rough sleeping – public area OR Town facility

CRM category Rough sleeping – Public area OR
Rough sleeping – Town facility

Action officers Rangers Team

Special interest officers Safer Neighbourhoods Officer
Assets Team – for Town facility

Receive internal notification of rough sleeping in a public area or Town facility.

Step 1 - Attend location

1. Person/s are in attendance:
 - i. If evidence of illegal activity or the person/s appear violent or threatening, call 000 or 131 444 if not an emergency.
 - ii. Ask the individual/s if they would like assistance. Provide them with a Support Services Directory. If possible, ask the individual for their name and date of birth to help facilitate outreach.



	<ul style="list-style-type: none">iii. Advise that camping is not permitted, and that they will need to find alternate accommodation.iv. Update CRM with action.v. Safer Neighbourhoods Officer to contact Department of Communities Office of Homelessness and arrange an outreach service to attend, where available and required. <p>2. Person/s are not in attendance:</p> <ul style="list-style-type: none">i. If evidence of illegal activity, call 000 if an emergency or 131 444 if not an emergency.ii. If camp appears to be abandoned, begin left belongings process.iii. Update CRM with action.iv. Safer Neighbourhoods Officer to contact Department of Communities Office of Homelessness and arrange an outreach service to attend, where available and required.
Step 2 - Revisit (3-6 days later)	<ul style="list-style-type: none">1. Repeat step above.<ul style="list-style-type: none">a. Inform person/s that the Town's Rangers and the WA Police Force will attend in approximately four days' time to instruct they find alternate accommodate.b. Update CRM with action.
Step 3 - Revisit (2 days later)	<ul style="list-style-type: none">2. Drive past or re-visit location two days later to check if person/s are still in attendance.<ul style="list-style-type: none">a. Person/s in attendance<ul style="list-style-type: none">i. Contact Safer Neighbourhoods Officer to coordinate WA Police Force visit.ii. Update CRM with actionb. Person/s are not in attendance.<ul style="list-style-type: none">i. Monitor location over the next two days and contact Safer Neighbourhoods Officer if there is evidence of person/s still camping in the area.ii. If camp appears abandoned, begin left belongings process.iii. Update CRM with action
Step 4 - Instruction to leave (4 – 8 days later)	<ul style="list-style-type: none">3. Attend location with WA Police Force to attend the location four to eight days later (pending WA Police Force availability).<ul style="list-style-type: none">a. Instruct person/s to leave.b. If the person/s refuse to leave, WA Police Force to issue a move on noticec. Update CRM with action4. As appropriate, create CRM for Assets Team to request Town facility or property is secured.5. Person/s do not return.<ul style="list-style-type: none">a. Close CRM action (approx. 14-21 days).
Person/s return	<ul style="list-style-type: none">6. Person/s return<ul style="list-style-type: none">a. Create CRM and complete with history of engagement with the person/s.



- b. Develop Request to Seek Assistance letter. Letter to include:
 - i. Encouraging person/s to accept offers of assistance from outreach services.
- c. Have letter approved for issue by the CEO or other Chief.
- d. Attend, issue, and read the letter to the person/s.
- e. Contact Safer Neighbourhoods Officer to advise WA Police Force of action taken and provide copy of the letter. Safer Neighbourhoods Officer to also notify and request outreach services to visit the person/s.
- f. Update CRM with actions taken.
- g. Monitor progress of outreach services. Escalate to Nuisance Behaviour Process if person/s refuse assistance from outreach services, demonstrates an intent to camp or remain in the area for an extended period of time and/or is engaging in anti-social behaviour.

Rough sleeping – private property

CRM category Rough sleeping – Private property

Action officers Safer Neighbourhoods Officer

Special interest officers Principal Environmental Health Officer
Principal Building Surveyor
Compliance Officer
Place Planning Team

Receive internal notification of rough sleeping on private property

Step 1 – Contact property owner

1. Safer Neighbourhoods Officer to contact property owner to advise of complaint and gain further information about the property.
 - a. Person/s have permission to be in property.
 - i. Update CRM and close job
 - b. Person/s do not have permission to be in property, and the property owner is willing to secure their property.
 - i. If the outreach service is available, ask the property owner if they would like the outreach service to attend. Inform the property owner that the outreach service cannot enter private property but can assist in connecting individuals to services from a public area.
 - ii. Provide advice to property owner on securing property.
 - iii. Ask the property owner if they would like information on future planning of the area and/or development advice.
 1. If yes – request relevant Place Leader call property owner.
 - iv. Contact WA Police Force to advise of squatting at the property.
 - v. Update CRM and close job.
 - c. Property owner is not willing to secure their property.
 - i. If the outreach service is available, ask the property owner if they would like the outreach service to attend. Inform the property owner

- that the outreach service cannot enter private property but can assist in connecting individuals to services from a public area.
- ii. Site visit by Safer Neighbourhoods Officer and representatives from Environmental Health, Compliance, Building and Place Planning
 - iii. Photograph building and determine whether further action needs to be taken by the Town if in a condition deemed unsafe, a risk to public health or against local laws.
 - iv. Update CRM with course of action determined.
 - v. Complete action, update CRM and close job
- d. The land is classified as Crown Land or owned by a State Government Entity.
- i. Contact the Department of Communities Office of Homelessness to organise for outreach services to visit the location.
 - ii. Notify the government agency responsible for the land of rough sleeping at the location.

Left belongings – public area OR Town Facility

CRM category	Left belongings
Action officers	Rangers Team
Special interest officers	Safer Neighbourhoods Officer

Receive internal notification of left belongings

Step 1 – Attend location	<ol style="list-style-type: none"> 1. Attend location. <ol style="list-style-type: none"> a. Person/s are in attendance. <ol style="list-style-type: none"> i. Begin rough sleeper process. ii. Update CRM with action. b. Person/s are not in attendance. <ol style="list-style-type: none"> i. If evidence of illegal activity, call 000 if an emergency or 131 444 if not an emergency. ii. Photograph items, leave 1st sticker notifying belongings will be impounded in 48 hours, and a Support Services Directory. iii. Update CRM with action.
Step 2 – Revisit (1 day later)	<ol style="list-style-type: none"> 2. Attend location 24 hours later. <ol style="list-style-type: none"> a. Person/s are in attendance. <ol style="list-style-type: none"> i. Begin rough sleeper process. ii. Update CRM with action b. Person/s are not in attendance but believe they have attended the location in the last 24 hours. <ol style="list-style-type: none"> i. Begin rough sleeper process. ii. Update CRM with action

	<ul style="list-style-type: none"> c. Person/s not in attendance and no indication they have attended the location in the last 24 hours. <ul style="list-style-type: none"> i. Photograph items, leave 2nd sticker notifying belongings will be impounded in 24 hours, and a Support Services Directory. ii. Update CRM with action
<p>Step 3 – Revisit (2 days later)</p>	<ul style="list-style-type: none"> 3. Revisit location 2 days later <ul style="list-style-type: none"> a. Person/s are in attendance. <ul style="list-style-type: none"> i. Begin rough sleeper process. ii. Update CRM with action b. Person/s are not in attendance, but they are believed to have attended the location in the last 48 hours. <ul style="list-style-type: none"> i. Photograph items, leave 2nd sticker (for the second time) notifying belongings will be impounded in 24 hours, and a Support Service Directory. ii. Revisit the location in 24 hours and follow 3.a. if person/are in attendance or 3.c. if person is not in attendance. iii. Update CRM with action c. Person/s are not in attendance and believe they have not attended the location in the last 24 hours. <ul style="list-style-type: none"> i. Photograph and impound personal items and dispose remaining waste items. ii. Leave 3rd sticker notifying that belongings have been impounded and can be collected from the Town.
<p>Step 4 – Revisit (Sporadic)</p>	<ul style="list-style-type: none"> 4. Revisit location intermittently over 7 days to find owner of the goods. <ul style="list-style-type: none"> h. Update CRM with action i. Close CRM action (approx. 7-14 days) a. Set reminder in the Impounded Goods Register and in MS Outlook to dispose of goods after 60 days.

Left belongings – private property	
CRM category	Left belongings
Action officers	Rangers Team
Special interest officers	Safer Neighbourhoods Officer
Receive internal notification of left belongings	
Step 1 – Contact property owner	<ul style="list-style-type: none"> 1. Contact property owner and ask if the property owner would like the belongings removed from their property:

- a. If the property owner would like the belongings removed from their property, the property owner must provide this in writing and agree upon a time to meet rangers on the property to collect the belongings.

(The statutory requirement is that belongings are to be held for 60 days).

Retrieving impounded left belongings

CRM category	Left belongings
Action officers	Rangers Team
Special interest officers	Safer Neighbourhoods Officer
1st request to CSCC to retrieve left belongings	<ol style="list-style-type: none"> 1. First application <ol style="list-style-type: none"> a. Advise applicant that there is no fee for retrieving left belongings on first application, but a fee may be payable on subsequent applications. b. Assist applicant to complete the Request to Retrieve Impounded Items form. c. Provide applicant with information on local services. d. Upload form to CM9 and advise Rangers of CM9 number. e. Rangers deliver items to Admin Centre and update Impounded Goods Register
2nd request to CSCC to retrieve left belongings	<ol style="list-style-type: none"> 2. Second application <ol style="list-style-type: none"> a. Advise applicant that there is no fee for retrieving left belongings on first application, but a fee is payable on subsequent applications. b. Process fee payment c. Assist applicant to complete the Request to Retrieve Impounded Items form. d. Provide applicant with information on local services. e. Upload form to CM9 and advise Rangers and Parking of CM9 number. f. Rangers and Parking deliver items to Admin Centre and update impound list. <p>For applicants seeking impounding fees to be waived, refer to D21/30060. Note, requests can be made by the applicant but are not guaranteed to be approved</p>

Nuisance behaviour

CRM category	Rough sleeping – Public area OR Rough sleeping – Town facility
Action officers	Rangers Team



Special interest officers

Safer Neighbourhoods Officer

Enabling Legislation

The Town of Victoria Park Local Government Property Local Law 2000

4.1 Behaviour which interferes with others

A person shall not in or on any local government property behave in a manner which-

- (a) is likely to interfere with the enjoyment of a person who might use the property;
- (b) interferes with the enjoyment of a person using the property;
- (c) may be considered disorderly or offensive or use indecent or improper language; or
- (d) is likely to interfere with the amenity of occupants of adjoining and nearby properties.

No modified penalty.

4.2 Behaviour detrimental to property

(1) A person shall not behave in or on local government property in a way which is or might be detrimental to the property

Modified Penalty: \$100

Step 1 –

Report of behaviour

1. Witness or receive report person/s are behaving in a manner so as to interfere with others.
 - a. Create CRM, attend location and record the person/s and their behaviour.
 - b. If evidence of illegal activity, call 000 if an emergency or 131 444 if not an emergency.
 - c. Gather supporting evidence via body cameras and/or photographs where possible.
 - d. If safe to do so, advise person/s of action required to ensure compliance
 - e. Safer Neighbourhoods Officer to contact the Department of Communities Office of Homelessness to determine whether the individual is known to the Department and is connected to support. Safer Neighbourhoods Officer to work with the Department of Communities Office of Homelessness to determine an appropriate response, which may include outreach services.

Step 2 –

Non-compliance/ Repeat behaviour

2. In the event of non-compliance or repeat behaviour
 - a. Safer Neighbourhoods Officer to continue working with the Department of Communities Office of Homelessness to determine appropriate responses.
 - b. If the anti-social behaviour continues to escalate, brief Manager Business Services, Manager Community and C-Suite and request approval to complete Nuisance Behaviour Process
 - c. Develop Request to Leave letter and have approved by CEO or other Chief. Letter to include:
 - i. History of engagement with the person/s including any internal and outreach support that has been previously provided.
 - ii. Details of the nuisance behaviours
 - iii. Local law clauses that have been breached.
 - iv. Formal request to leave the area in 48 hours and to take any belongings with them.
 - v. That the Town will seek to issue a banning notice if they do not comply

	<ul style="list-style-type: none"> vi. Attach Support Service Directory. d. Attend, issue and read letter to person/s. Record with body cameras. Depending on circumstances and previous engagements, delivery and readability of the letter will be considered with support of outreach service when appropriate. e. Contact Safer Neighbourhoods Officer to advise WA Police Force of action taken and provide a copy of the letter. f. Update CRM with action
Step 3 – Compliance assessment (14 - 21 days later)	<ul style="list-style-type: none"> 3. Person/s comply with letter. <ul style="list-style-type: none"> a. Close CRM action (approx. 14-21 days) 4. Person/s do not comply with letter. <ul style="list-style-type: none"> b. Senior Ranger staff call 131 444 and request the person/s be moved on, request CAD number. Repeat up to three times. c. Update CRM with action each time
Step 4 – Request banning notice	<ul style="list-style-type: none"> 5. Person/s remain after three reports to WA Police Force <ul style="list-style-type: none"> a. Brief CEO and C-Suite and request approval to issue a banning notice
Step 5 – Banning notice	<ul style="list-style-type: none"> 6. If request is approved. <ul style="list-style-type: none"> b. Rangers develop and issue letter to ban the person/s. Record with body cameras. c. Contact Safer Neighbourhoods Officer to advise WA Police Force of action taken and provide a copy of the letter. d. Update CRM with action
Step 6 – Trespass	<ul style="list-style-type: none"> 7. Person/s remain in the area or return to the area. <ul style="list-style-type: none"> a. Senior Rangers staff to call 131 444 each time witnessed or reported to report trespass and log CAD number in CRM.

Staff engagement with rough sleepers

CRM category Rough sleeping – Internal Referral

Action officers All Staff

Special interest officers Safer Neighbourhoods Officer
Rangers Team

You are witness to rough sleeping

**Step 1 –
Assess situation** Assess the situation. Is it safe to engage with the individual/s? If it is unsafe to engage with the individual or you do not believe you have the adequate training required to engage, please do not engage.

If it is safe to engage, and the individual is responsive to help, please provide them with a support services directory. A conversation can start with 'How are you? Can I help connect you to any services?'

	<p>In both situations, please take note of the location of the individual and any identifying factors.</p> <p>Gathering information on individuals experiencing homelessness, such as a name and date of birth, can help the Town link the individual with the Department of Communities and identify if they are connected to services.</p>
Step 2 – Report	<p>Report the location of the individual and any interactions and identifying details you may have gathered through CRMS under the category ‘Community Development – Rough Sleeper – Internal Referral’. This report will be received by the Community Development Team to initiate further response.</p>

Appendix

Identifying Town owned land

Using the application IntraMaps, open the ‘Property Enquiry’ module. Add the layer ‘Property ToVP Ownership’ to view Town owned property.

Identifying Private Property Owners

Using the application IntraMaps, search for the property address and identify the Authority Owner. If there are no contact details listed for the property owner, using CM9 search for the address or property owner's name, using the search bar, to locate contact information.

Identifying Crown Land

Using the application IntraMaps, in the ‘Property’ module, search or click on the property in question. Check the Property details in the right-hand panel to view the Reserve No. If it is Crown land it will be listed as ‘V CROWN LAND’.

Identifying Crown Land with a management order to the ToVP

Using the application IntraMaps, open the ‘Property Enquiry’ module and click on the property in question. Check the Landgate Tenure/Reserve details in the right-hand panel to view if the property is vested to the Town of Victoria Park.

Related documents

D21/74690 – Impounding Fees – Request to retrieve impounded items for rough sleepers

D21/30060 – Impounding Fees – Waiving process for rough sleepers

D12/30059 – Impounding Fees – Request to waive fee form

D21/30057 – Impounding Fees – Memo Template

Responsible officers	<p>Principal Environmental Health Officer Principal Building Surveyor Compliance Officer Place Planning Team Parking and Rangers Team Community Development Team Customer Service Teams Assets Team</p>
Practice manager	<p>Manager Community</p>

Approval authority	CEO
Next evaluation date	December 2025

Revision history

Version	Action	Date	Authority	TRIM Reference
1	Adopted	07/01/2021	CEO	D21/1425
2	Adopted	14/12/2023	SMT	D24/1414