



This form will report compliance with your permit as determined by an Environment Agency officer

Site	Escrick Waste Treatment Facility		Permit Ref	104658		
Operator/ Permit holder	ACUMEN WASTE SERVICES LIMITED					
Date	24/11/2023		Time in	10:00	Out	13:00
What parts of the permit were assessed	Compliance Action Plan dated 14 July 2023, biodegradable fines removal					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	Lauren Hill - Technical Director					
Officer's name	Robin Bispham, Anthony Sorrell		Date issued	08/12/2023		

**Section 1 - Compliance Assessment Summary**

This is based on the requirements of the permit under the Environmental Permitting Regulations (EPR). A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our [Compliance Classification Scheme](#) (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your [local office](#).

Permit Conditions and Compliance Summary			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates & litter	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

**KEY:** C1, C2, C3, C4 = CCS breach category ( \* suspended scores are marked with an asterisk),  
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored  
MSA, MSB, TCM = Management System condition A, Management System Condition B and Technically Competent Manager condition which are environmental permit conditions from Part 3 of schedule9 EPR (see notes in Section 5/6).

<b>Number of breaches recorded</b>	0	<b>Total compliance score</b> (see section 5 for scoring scheme)	0
If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response			

## Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

**This CAR Form has been reissued to correct a drafting error in section 4.7.4, references to "October survey" should have read November survey. This error has been corrected, see highlighted text in section 4.7.4, below.**

### 1.0 Scope

This CAR Form records the Environment Agency's review of Acumen Waste Services Ltd's work to remove waste described as, "*Unprocessed 19 12 12 'fines' stockpile (as at Fig 5-10 and 11-14)*", in its compliance action plan date 14 July 2023. The Environment Agency was informed that the waste removal was completed on 16 November 2023. The 24 November 2023 site inspection comprised a visual inspection of the relevant storage area and a gas emissions survey of the footprint area of the large pile that was located outside the concrete pad / sealed drainage area.

The monthly summaries of waste movements, that were submitted throughout the removal activities were also reviewed.

### 2.0 Waste Removal Monthly Summaries

The monthly summary reports provided by Acumen Waste Services Ltd record that the first load was removed on 11 July 2023 and the last load recorded was removed on 16 November 2023. During this period removal of 46,866 tonnes of 19 12 12 mixed MSW and C&D fines waste is recorded, across 2,006 separate loads.

In addition, the monthly summaries also record removal of:

- 5,875 tonnes of leachate (16 10 02), across 210 separate loads
- 716 tonnes of leachate (19 07 03), across 30 different loads
- 240 tonnes of trash (19 12 12), across 14 separate loads

The code 19 07 03 is the code for non-hazardous landfill leachate. The site from which the leachate was removed is not a landfill and so this code should not have been used. Acumen Waste Services Ltd have confirmed verbally that only one type of leachate was removed from the site (16 10 02) and that the 19 07 03 codes was used in error on a relatively small number loads.

It is our intension to review the paperwork involved in these removals further in due course and so no further comments are provided at this time.

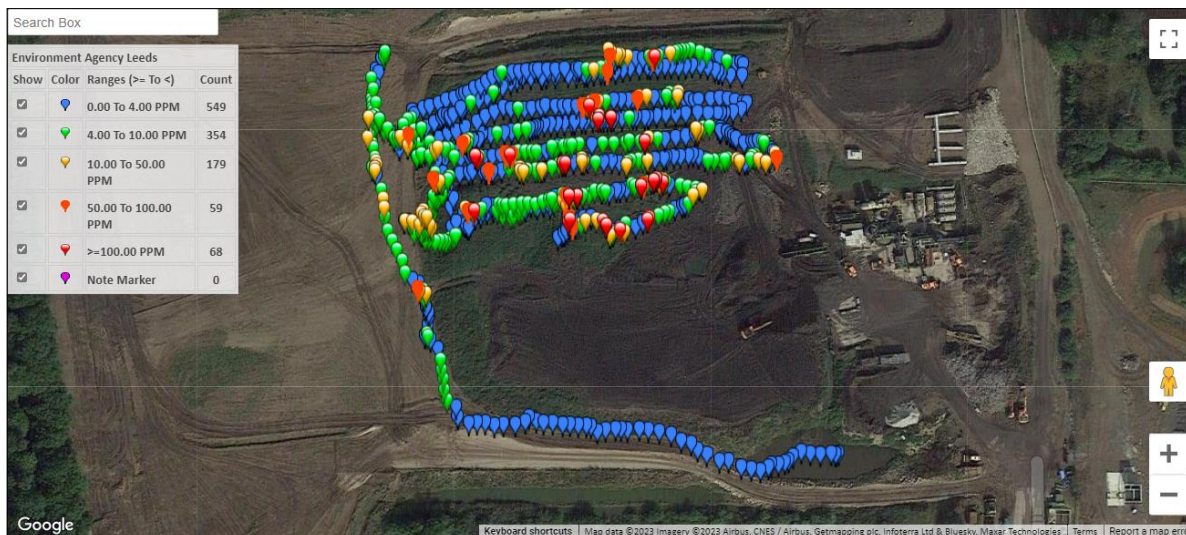
### 3.0 Visual Inspection of the Footprint Area of the Main Fines Pile

The footprint area of the main fines pile was visually inspected whilst carrying out the gas emissions survey. Removal of the fines pile has resulted in a large, flat plateau area. The surface of this area was dark in colour and had apparently been bladed out into a flat surface. There were no areas where fines obviously remained on site. However, because the survey detected some residual near surface methane (see below) it will be necessary to observe some trial pits to confidently state that no fines remain below the surface – see below.

## 4.0 Methane Emissions Survey

**4.1** A methane emissions survey, similar to the one carried out on 23 June 2023, was carried out using a Geotech TDL 500 methane detector. On this occasion our GPS data-logging system was available and so this was used throughout the survey to log the data. The TDL works on the principle of infrared absorption spectroscopy to detect surface methane concentrations at the parts per million (ppm) level. Typical background surface methane levels in the UK are below 5 ppm and for the purposes of the type of emission survey at this site, we would only consider readings above 10 ppm to be significant (allowing for measurement uncertainty). The infrared beam is tuned to a methane specific absorption wavelength and is therefore unresponsive to other hydrocarbons. The serial number of the unit is 971221. The unit is calibrated every two years in accordance with the manufacturer's recommendations, the last calibration being undertaken in April 2022.

**4.2** Having the data-logger available on this occasion means that we are able to present the data more comprehensively and in a visual format – see figure 1, below. The data logger utilises an app on a mobile phone and records the methane concentration measured by the Geotech TDL 500 every 4 seconds. It also geolocates it using the GPS functionality of the mobile phone. The Geotech TDL 500 and the relevant mobile phone were both carried by the same Environment Agency officer throughout the survey and so the two items were co-located at all times. The wind conditions throughout the survey were N/NNW, as indicated by the on-site windsock, at level 5 on the Beaufort Scale – branches of moderate size move. The wind was blustery in nature. According to the BBC Weather App the atmospheric pressure was 1021mb.



**Figure 1** – banded and geolocated Geotech TDL 500 measurements overlaid on an aerial photograph of the site. Note the photograph is taken from the web-based software used in conjunction with the mobile application that logs the data and location. It does not show the state of the site at the time of the survey.

**4.3** Figure 1 shows the location of each data-logged reading and the relative methane concentration at each point by reference to colour coded bands, see key within figure 1. The key also records the number of individual readings within each colour coded band. The data logger was turned on whilst we were walking up to the fines footprint area, at the location of the recently filled in lagoon at the SE corner of the site. The lagoon was seen to have been filled in with what was described by Acumen Waste Services Ltd and non-waste fill material. Whilst this area was not surveyed thoroughly the readings at the near surface of the fill material were all at background levels – 0 to 4 ppm. The data logger continued to log data as we walked up onto the fines footprint area, including on an area that is probably on the adjacent Escrick Environmental Services Ltd site – see transect that runs roughly North to South to the West of the main survey area. Note, there is no physical demarcation identifying the boundary between the different permit areas that are adjacent to each other on this site.

**4.4** The survey of the fines footprint area comprised 8 transects. Transect 1 started in the NW corner and proceeded West to East along the Northern edge of the footprint area. Transect 2 then move slightly South of transect 1 and was walked in an East to West direction. The survey continued in this fashion until 8 transects, covering the fines pile footprint area had been completed.

**4.5** In addition to the data logged readings notes were made in respect of the Geotech TDL 500's response and officer olfactory observations for each transect walked. These notes are summarised below.

#### Transect 1

West to East, along the Northern edge of the Acumen main fines pile footprint area. Some near surface peaks on the Geotech TDL 500, up to approximately 200ppm, that were associated with bubbling puddles (bubbling minor compared to previous site observations when fines obviously remained in situ). These were discreet sources.

#### Transect 2

East to West, approximately 5m South of Transect 1. Geotech TDL 500 near surface peaks up to approximately 100ppm in depressions in the site surface – very discreet sources. Strong gas odour detected at the Western end of the transect.

#### Transect 3

West to East, approximately 5m South of Transect 2. Odour evident on the middle part of the fines footprint area that was intermittent and more of a waste type odour, like a bin type smell, as distinct from the strong gas odour that was detected at the Western end of Transect 2. Geotech TDL 500 near surface peaks to approximately 100 – 200ppm when the site surface was scrapped back by officer's boots.

#### Transect 4

East to West. Discreet Geotech TDL 500 near surface peak to approximately 1500ppm when the site surface was scrapped back officer's boot. Again, intermittent bin type odour, not very intense, assessed as level 3, distinct when the odour was present (refer guidance, H4 Odour Management, How to comply with your environmental permit). Odour nowhere near the level that it has been during previous inspections when fines were still obviously in situ. Odour at the Western end of the transect was different in character – gassy.

#### Transect 5

West to East. Geotech TDL 500 near surface peaks to >100ppm when the site surface was scrapped back by officer's boot. Some intermittent bin odour present. Western end TDL 500 peaks to >300ppm when the site surface was scrapped back with the boot.

#### Transect 6

East to West. Some intermittent bin type odour. Geotech TDL 500 near surface peaks to approximately 40ppm, >600ppm and >80ppm, at different locations, when the site surface was scrapped back by officer's boot. Odour at the Western end of the transect was different in character – gassy.

#### Transect 7

West to East. Strong sulphurous gas odour was present at the Western end. In the middle area there was some intermittent bin type odour. Geotech TDL 500 near surface peaks to >300ppm and >1000ppm, at different locations, when the site surface was scrapped back by officer's boot.

Bubbling puddles in a track mark peaked at >100ppm and >1500ppm, at different locations. Minor bubbling compared to previous observations when fines were still obviously in situ. These were discreet sources.

#### Transect 8

East to West. Southern extent of the survey, at or possible just beyond the main fines pile footprint area. Discreet source (bubbling puddle) Geotech TDL 500 near surface peaks to >1000ppm.



Geotech TDL 500 near surface peaks to approximately 95ppm and >1000ppm, at different locations, when the site surface was scrapped back by officer's boot. Some intermittent bin type odour present.

**4.6** Following the gas survey of the Acumen Waste Services Ltd main fines pile footprint area, further gas surveys were carried out on areas of the adjacent Escrick Environmental Services Ltd permitted areas. The results of these gas surveys will be reported separately to Escrick Environmental Services Ltd. The results of these surveys provide some further context to some of the observations during the Acumen survey. Having completed the Escrick Environmental Services Ltd surveys it was clear that the sulphurous gassy odour, that was picked up at the Western end of the Acumen transects, was the result of odorous emissions from some deposits on the Escrick Environmental Services Ltd site, the Western end of the Acumen transects being downwind of the relevant Escrick Environmental Services Ltd deposits at the time.

#### **4.7 General Observations and Comparison to Earlier Observations, including the June 2023 Gas Survey**

**4.7.1** The state of the site and the general level of odour observed whilst carrying out the Acumen Waste Services Ltd gas survey on 24 November 2023 is much improved compared to previous observations when biodegradable fines were obviously still in situ. The odour present on the fines pile footprint area was different in character - more of a bin type odour compared to the prevalent sulphurous gassy odour that was observed when the biodegradable fines waste was obviously still in situ. The odour was more intermittent and less offensive. It is also clear that much less gas is being emitted.

**4.7.2** The area surveyed on 24 November 2023 was the footprint area of the large pile of biodegradable fines that was being stored outside the sealed drainage / concrete pad. The upper surface of this large fines pile was surveyed during the gas survey carried out in June 2023 (see CAR Form 104658/0466314 and refer to comments for the area described as, "*the large pile of 'undisturbed' material that contained significant quantities of MWS fines (as indicated by the presence of significant quantities of plastic and other biodegradable material)*", designated as distinct area number 2). Data logging was not available during the 23 June 2023 survey but observations noted during the survey of area number 2 included the following comments. *There was a very strong, persistent and unpleasant gas odour throughout the survey of this waste pile. In some areas the smell was so strong it was nauseating and time spent in certain locations had to be minimised due to the strength of the odour. Near surface methane readings fluctuated across the flanks and top surface of the pile. Peak near surface readings ranged from 80ppm to 2600ppm, at different locations.*

**4.7.3** During the June 2023 survey, near surface readings, which are comparable to the near surface readings shown in Figure 1, above, ranged from 80ppm to 2600ppm. This being the case, had data logging been available for the 23 June 2023 survey, all the data points would have been in the 50-100ppm or >100ppm bands, i.e. they would have all been red. During the November 2023 survey far fewer readings exceeded 50ppm and many of those that did were associated with distinct sources, i.e. a bubbling puddle, boot scrape or a depression in the site surface. Although the Geotech TDL 500 walkover survey was not quantitative in terms of emission rate or quantity of methane emitted, it is clear, from the near surface concentrations recorded, that the amount of methane being emitted from the site surface has reduced very significantly due to removal fines.

**4.7.4** In addition, the olfactory observations of the EA officers conducting the survey also demonstrate the scale of the improvement. One of the officers was present at both the June and November gas surveys. The levels of odour observed by this officer whilst walking across the surface of the fines pile in June was so persistent, offensive and intense that it made the officer feel nauseous and the officer had to limit time spent in certain areas due to the strength of the odour. The same officer noted that (excluding, in respect of character, the odour drifting from the Escrick Environmental Services Ltd deposits) the odour observed during the **November** 2023 survey was different in character (bin type odour, as opposed to a gas type odour), intermittent, much less

intense and much less offensive. Neither officer present during the **November** survey felt nauseous and there was no need to limit time spent in any areas of the site (including during the surveys on the adjacent Escrick Environmental Services Ltd areas).

The following are important points to note in terms of contextual differences of the site during the June 2023 survey compared to the November 2023 survey, when considering the apparent drift from the Escrick Environmental Services Ltd deposits that were observed during the November survey:

- Wind conditions during the 23/06/2023 survey were different – relatively light and from the SW, not the N.
- Acumen fines pile survey on 23/06 was carried out a height compared to any potential EES sources.
- EES areas surveyed on 23/06 did not show as much methane emission as during the 24/11 survey, indicated that gas generation from the EES deposits may have increased in the intervening period.

#### **4.8 Odour Incident and the Impact on the Number of Odour Reports**

The monthly waste removal summaries (see section 2 above) record that the majority of the biodegradable fines waste was removed from site by 5 September 2023 – 40,123 tonnes (1,676 loads) of 19 12 12 fines, out of a total of 46,866 tonnes (2,006 loads), was removed by this date.

There was a corresponding marked reduction in the number of odour reports received by the Environment Agency, from members of the public from September 2023 onwards, compared to the numbers received in June, July and August 2023. This also supports the fact that the removal of the biodegradable fines from the Acumen Waste Services Ltd site has significantly reduced odorous emissions from the site.

#### **5.0 Assessment of Compliance with the requirement to remove waste described as, “Unprocessed 19 12 12 ‘fines’ stockpile (as at Fig 5-10 and 11-14)”, in its compliance action plan date 14 July 2023**

This requirement was included in a compliance action plan that was produced in respect of two distinct but related compliance issues:

1. Non-compliance with conditions 2.1.1 and 1.1.1, as recorded in CAR Form 104658/0465164
2. Non-compliance with condition 3.2.1, as recorded in CAR Form 104658/0466314

**5.1** Visual observations during our site visit on 24 November 2023, did not identify any areas where fines waste obviously remained on site. However, the methane survey did still pick up some elevated near surface methane concentrations across the footprint of the main pile area. The emissions across this area were much reduced from those observed during the methane survey that we carried out in June 2023 and we are confident that the removal of the fines has resulted in a significant reduction in emissions, including emissions of odour, which is relevant to condition 3.2.1.

**5.2** The large pile of undisturbed biodegradable fines that was being stored outside the sealed drainage / concrete pad was stored on unmade ground, with the underlying material comprising previously recovered waste materials. There are several potential sources of the residual elevated methane emissions that were detected during the November methane survey. These include:

- The presence of residual sub-surface biodegradable fines.
- The infiltration of leachate from the biodegradable fines into the underlying materials.
- Organic content of the underlying materials themselves degrading to produce gas.

**5.3** The weather / ground conditions at the time of the November survey need to be considered. The ground conditions were wet. Wet ground conditions can act to limit flux of gas through site surfaces (can act like a seal), which could mean the measured methane concentrations recorded were lower than might have been the case with dry ground conditions. However, given the fact that

the higher concentrations were observed in relation to discrete features – boot scrapes, bubbling puddles and/or depressions in the surface, it may have been the case that concentrations immediately above these features were more significant than if the ground conditions had been generally dry (potentially the gas was being concentrated through these point of lower resistance).

**5.4** The survey findings were discussed with Acumen Waste Services Ltd representatives during the 24 November 2023 site inspection and the following was proposed:

- In order to provide confidence that residual sub-surface fines are not the cause of the residual gas emissions the Environment Agency will observe some trial pits into the upper layers of the remaining materials to check for the presence of fines. The EA will defer final compliance assessment in relation to fines removal until this trial pitting exercise has been completed.
- It would be useful to carry out regular gas walkover surveys in order to better understand the significance of the remaining emissions and how they respond to different weather (e.g. atmospheric pressure) / ground conditions. Acumen Waste Services Ltd representatives indicated that the company might invest in a Geotech TDL 500 (or equivalent) to enable it to carry out regular monitoring itself.
- Consideration would be given to the benefits or otherwise of placing a non-waste mineral layer across the fines footprint area in order to provide a medium through which any residual gas can pass and where it might adsorb and/or oxidise.

**5.5** Notwithstanding the comment in section 5.4, above, the Environment Agency recognises the significant improvements that the removal of approximately 47,000 tonnes of biodegradable waste fines has delivered in terms of reducing the potential for odorous emissions from the site. This is reflected in the fact that the number of odour reports received by the Environment Agency from members of the public has reduced significantly from September onwards.

## **6.0 Sealed Drainage and the Leachate Lagoon**

It was noted during this inspection that the leachate lagoon has been filled in with cohesive general fill material. The EA was informed during a site inspection on 19 October 2023 that it was Acumen's intention to fill in the lagoon and provide replacement storage capacity by installing two sealed tanks as part of the sealed drainage system. Details of this proposal, including a design drawing and the specification of the new system were requested in CAR Form 104658/0479046 (see para 5.6). To date the requested information has not been provided. The Environment Agency was informed during this inspection that the designed is not yet finalised because of uncertainties around the on-going and future arrangements between Acumen and its landlord, Escrick Environmental Services Ltd. The uncertainty seems to be around where to locate the replacement storage tanks given potential future investment in a new wash plant and uncertainty around the design of the proposed wash plant. Whilst the reasons for the uncertainty around the final design / tank location may be valid it is important that the impermeable surface / sealed drainage provisions are maintained in order to demonstrate compliance with condition 2.1.1 of the permit. It is not clear how you can demonstrate compliance with this requirement currently because in the absence of the lagoon / the replacement tanks it is not clear how drainage from the concrete pad is contained.

**Action** - Please provide details of how these requirements are currently provided, including a plan and specification of the interim system. **Deadline:** 19 December 2023.

We did not have time to adequately address this issue during this inspection and so we will defer compliance assessment in respect of this issue until you have provided this information requested above.

**Section 3- Enforcement Response****Only one of the boxes below should be ticked**

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence\* and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

*\*Non-compliance with MSA, MSB & TCM do not constitute an offence but can result in the service of a compliance, suspension and/or revocation notice.*

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

**Section 4- Action(s)**

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required / Advised	Due Date
See Section 1 above			



## Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence\* and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

### See our Enforcement and Civil Sanctions guidance for further information

*\*A breach of permit condition MSA, MSB & TCM is not an offence but may result in the service of a notice requiring compliance and/or suspension or revocation of the permit.*

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

### Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> potential environmental effect	0.1

**Operational Risk Appraisal (Opra)** - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

#### MSA, MSB & TCM are conditions inserted into certain permits by Schedule 9 Part 3 EPR

**MSA** requires operators to manage and operate in accordance with a written management system that identifies and minimises risks of pollution.

**MSB** requires that the management system must be reviewed, kept up-to-date and a written record kept of this.

**TCM** requires the submission of technical competence information.

## Section 6 – General Information

### Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within 28 days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

### Customer charter

#### What can I do if I disagree with this compliance assessment report?

A permit holder can challenge any part of the CAR form by writing to the Environment Agency office local to the site within 28 days of receipt. If the issue cannot be resolved by the local office, a permit holder can raise a dispute through our official [complaints procedure](#).

If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the [Parliamentary and Health Service Ombudsman](#), phone their helpline on 0345 015 4033.