SRUC

EQUALITY IMPACT ASSESSMENT

Policy title:	**Flexible Working Policy**
Policy lead/ owner:	HR Business Partner
Others involved in EqIA assessment group	Assessment group included: HR Business Partner HR Admin
Policy implementation date:	01/12/2022

1 Framing the policy

1.1 Briefly describe the outcomes, aims and purpose of the policy:

This policy sets out the SRUC's approach to flexible working arrangements in accordance with relevant employment legislation.

The aims of this policy are to;

- Inform employees of their statutory right to request a change to their contractual terms and conditions of employment to work flexibly, subject to the eligibility conditions set out below.
- Advise employees on the application procedure for applying for flexible working.
- Outline eligibility requirements necessary to apply for flexible working.

1.2 Is the policy new or being changed, reviewed or stopped?

Review in line with Policy Review cycle

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1.3 Who is affected by this policy?

This policy applies to all eligible employees who have a contract of employment with SRUC. To be eligible, an employee must have a contract of employment for at least 26 weeks prior to the request and have not submitted a previous request in the previous 12 months. The Flexible Working policy does not apply to agency workers or self-employed contractors.

1.4 Are there any other SRUC policies that may be affected by this policy?

Maternity Leave, Paternity/Partner Leave, Adoption Leave, Special Leave, Attendance Management Policy, Hybrid Working Policy, Shared Parental Leave,

2 Evidence relevant to the policy including consultation

The information you gather in this section will:

- help you to understand the importance of your policy/ practice/ process/ service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

2.3 **Evidence:** Set out in the table what you know about the experiences of people in terms of each equality group. Consider the diversity within each group (e.g. experiences of people from different religions or faiths) as well as the differences between groups. There may also be cumulative barriers experienced by people when you look at more than one group together (e.g. experiences of women of different minority ethnic groups, so the intersectional impact of sex and race).

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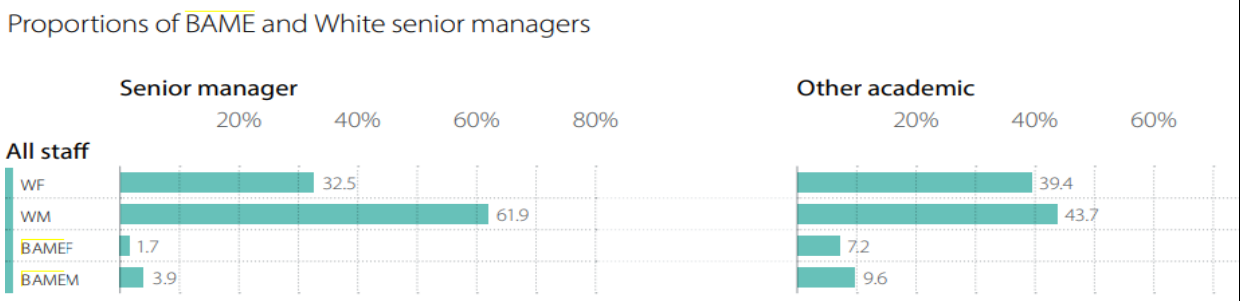
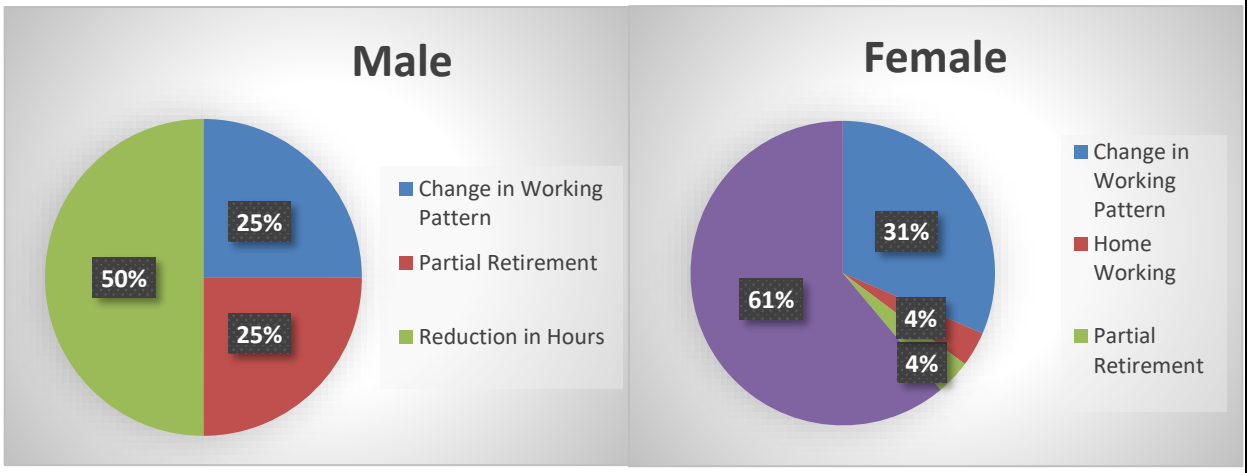
General evidence
The Flexible Working policy has been reviewed against the Advisory, Conciliation and Arbitration Service (ACAS) Code of Practice Code of Practice on handling in a reasonable manner requests to work flexibly | Acas. Post-pandemic there has been a marked increase in the number of employees working from home, according to the Office of National Statistics, 84% of workers who had to work from home during the Covid pandemic said they planned to continue a mix of home working and office based working going forward. Between April 2021 and February 2022, the number of employees mostly working from home increased by 12%. Three-quarters of people working from home or have adopted a hybrid way of working also reported an increase in their work/life balance. According to the CIPD, promoting flexibility within an organisation has several advantages to both the business and employees. For example, employees can access work more easily and improve work/life balance which promotes commitment and reduces absences, increases retention which maintains a talent pipeline, and can help close the gender pay gap. The Gov.uk Equality Hub argue that flexible working is key to ensuring women can reconcile working and caring responsibilities, and should be normalised across all levels of seniority to allow access to higher paying roles. SRUC data confirms 5.47% of employees requested flexible working between 1 April 2021 and 31 March 2023. Of this, 97.8% were approved, the remaining were granted flexible working on a revised basis. Flexible working describes any working arrangements that vary from standard practice or change in terms and conditions. These include change to the number of hours or days worked, change to working times, shorter working year, a job share arrangement, amended work patterns e.g. annualised hours, compressed hours, term time working and home working. SRUC saw an increase of flexible working applications of 44% between 2022 and 2023. We ultimately conclude that the policy closely reflects the ACAS guidelines and covers SRUC's statutory obligations in relation to flexible working practices and allow employees to enhance their work/life balance.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	**What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service?** Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Age	**Office of National Statistics – 2021 Census Data**	The internal data shows that the highest proportion of employees applying for flexible working in 2022 is within the 55-64 age range at 33%. In 2023 the internal data shows an increase of employees aged between 25 – 34 to 33%, an increase from 11% of applications made in 2022. This age group is the only group that saw a significant increase between 2022 and 2023 financial year of overall flexible working applicants. In 2023, employees aged between 55-64 applying for flexible working decreased slightly to 31%. According to the Office of National Statistics, the youngest and oldest working age employees were the least likely to hybrid work, whereas employees aged 30 to 49 are the most likely to adopt this way of working. This is contradictory to SRUC internal data, as the two highest age range to apply for flexible working are employees aged between 25-34 and 55-64.
Disability	**CIPD Flexible Working Practices** **Scope – Part time and Flexible Working**	10% of employees requesting flexible working in 2023 declared a disability, this is an increase from 4% in 2022**.** The highest proportion of SRUC employees requesting flexible working reported no known disability. Declaring a disability and preferring not to disclose a disability status follow the overall proportions of employees at SRUC. A snapshot of SRUC internal data in 2022 informs us that 7.2% of our total employee population declared a disability. 9.2% of employees preferred not to say or left the information blank. 83.65% of SRUC population declared no known disability. Flexible working can be requested as part of a reasonable adjustment which affords more rights as they fall under the 2010 Equality Act as a protected

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	**What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service?** Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		characteristic. The 'Right to Request' flexible working was introduced in April 2003 opening statutory requests to all employees with eligible criteria, previously this only applied to parents and carers.
Race	The Prince's Responsible Business Network. Who Cares? Report 2022 AdvancedHE Equality and Higher Education Staff Statistical Report 2020	Internal data from 2022 shows the majority of employees requesting flexible working declared themselves as UK White (85%), this decreases in 2023 to 79%. In 2022 this is followed by employees declaring their ethnicity as Other Ethnic Background (11%) which also decreases in 2023 to 3%. Research commissioned by Business in the Community (BITC), the Prince's Responsible Business Network and Ipsos UK for BITC's Who Cares report investigated the impact of race upon employment outcomes. A poll of 5,444 UK employees found that one in three (32%) ethnic minority workers have left or considered leaving a job due to lack of flexibility, compared with just 21% of white workers. The CIPD recommend flexible working as an action to improve inclusivity. AdvancedHE statistical data shows inequality between BAME (Black, Asian and Minority Ethnic) employees in senior management positions when compared to white employees;

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	**What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service?** Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		 This is relevant as research also found that employees earning over £26,000 felt more supported when reconciling work and caring responsibilites compared to employees earning below this.
Sex	Facts_about_Carers_2019.pdf (carersuk.org) [CIPD Trends in Flexible Working Arrangements] [Shagvaliyeva, S. and Yazdanifard, R. (2014). Impact of flexible working hours on work-life balance. *American Journal of Industrial and Business Management,*]	In 2022, 58% of SRUC employees identify as female, 40% as male and over 2% identify as either other or prefer not to say/unknown. Comparatively, 51% of Scotland's population are women, 49% men. In the year ending 31*st* March 2022, SRUC received 27 applications for formal flexible working, of these 27, 2 applications were initially rejected but an alternative working pattern was subsequently agreed. The majority, 93%, of the applications were from employees who are female (25 out of 27). Over 66% of applications in 2021 were employees requesting a decrease in hours, the remaining 33.3% were employees looking to formalise a work pattern. There was an increase of applications from 2022 to 2023 by over 44%, and this also saw a higher percentage increase from applications from male employees up from 2% in 2022 to 13% in 2023.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	**What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service?** Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	[online] 04(01), pp.20–23.	Evidence shows that 58% of carers are female and 42% are male. 1 in 4 women aged 50-64 have caring responsibilities, compared to 1 in 6 men. The majority of term time working contracts are within the education industry and woman employees. There was a sharp decline of term time contracts during the Covid pandemic with a low increase post pandemic. Internal data from SRUC shows only 1.14% of flexible working requests were for term time only working. External research suggests that woman associate flexibility with increased work/life balance and is more likely to be taken up by women due to ideological beliefs, and men more likely to view flexible working practices resulting in lower income. The Bank of England policy maker, Catherine Mann, also states that women who accept flexible working options such as working from home risk stagnating their careers through invisibility. ACAS recommend a clear flexible working policy navigating progression routes. Below charts breaks down flexible working requests by sex and type of request;

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	**What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service?** Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		SRUC internal data shows reduction in hours is the primary flexible working request for both men and woman. 
Gender Reassignment		There is limited data collated by SRUC on gender reassignment in relation to the Flexible Working Policy. The majority of employees (59%) applying for Flexible working in 2022 recorded being the same gender as assigned at birth.
Sexual orientation	[AdvancedHE Equality and Higher Education Staff Statistical Report 2020]	85% of employees who applied for flexible working in 2022 identify as Heterosexual. This percentage is slightly higher than the full employee population who identify as Heterosexual which was 75% in 2022. AdvancedHE collate data on sexual orientation as part of the Equality and Higher Education statistical report. Data collected for the 2020 report provides information on employees working within the sector by sexual orientation. In line

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	**What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service?** Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		with SRUC internal data, a significant percentage (15%) of employees prefer not to disclose this information.
Religion or Belief	AdvancedHE Equality and Higher Education Staff Statistical Report 2020	Most staff (33%) requesting flexible working between 1 April 2021 and 31 March 2023 declared no religion or philosophical belief. This is in line with AdvancedHE statistical data 2020 who reported 29%. However this is lower proportions than all SRUC staff data in declared no religion or philosophical belief as 41%. Employees who reported Christian – Protestant religion or belief were the second highest group of employee who applied for flexible working in 2022 – 30% and 2023 – 31%. This is higher than the SRUC staff proportions, recorded as 18.7% in 2022 and 18.1% in 2023.
Pregnancy or maternity	Atkinson, C and Hall, L (2009) The role of gender in varying forms of flexible working. Gender, Work & Organization, 16 (6). pp. 650-666. CIPD Flexible Working Practices	Several external sources cited the benefits of flexible working in relation to reconciling caring responsibilities and work, however this is one of many benefits to both business and individuals, suggesting a move away from the traditional flexible working practices prior to April 2003. SRUC internal data confirms most employees requesting flexible working do not have caring responsibilities. Out of the 27 applicants in 2022, 3 had recently returned from maternity leave. SRUC continues to promote flexible working options to all employees during an employee's parental leave, this is highlighted in all parental policies and throughout managers guidance. Out of the 39 applications in 2023, 5 employees had returned from maternity leave immediately before their request.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	**What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service?** Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Marriage or civil partnership	Bryan, M.L., Sevilla, A. Flexible working in the UK and its impact on couples' time coordination. *Rev Econ Household* **15**, 1415–1437 (2017).	The majority of employees requesting flexible working declared their marital status as married in 2022 at 63%, this decreased in 2023 to 44%, a 19% variance between the financial years, although remaining the highest proportion. 2023 internal data shows a significant increase of employees declaring their marital status to single and living together, from 11% to 23% and 19% to 23% respectively. Achieving work/life balance is cited as one of the benefits to flexible working, one benefit for employees in a partnership is that of increased synchronised time.

2.4 **Consultation and stakeholder involvement**: Speaking to people who will be affected by your policy/ practice/ process/ service can help clarify the impact it will have on different equality groups. Describe below what you learned from the consultation/ involvement. Consultation can take time so make sure that you build this into your policy review/ development timeline.

This policy is currently being developed in consultation with all SRUC recognised Trades Unions, Prospect, EIS and Unison, who represent all staff throughout the organisation. In addition, as this is an internal policy, SRUC will also consult with all employees through the policy review process. These include SRUC Rainbow Network.

2.5 Record here if you need to undertake a full equality impact assessment based on your evidence above.

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality	No	Proceed to sign off (step 5) to agree with decision makers that no EqIA is required based on current evidence
There is relevance to some or all of the equality groups	Yes	Proceed to Step 3: complete full EqIA
It is unclear if there is relevance to some or all of the equality groups	Yes	Proceed to Step 3: complete full EqIA

3 Impact on equality groups and changes to policy

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- **Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010?** Yes. Evidence above shows there may be differences felt between protected characteristics on ability to apply for flexible working and ideologies surrounding flexible working practices. This will be mitigated by ensuring fair and consistent application of the policy. The Flexible Working Policy is in line with legislative requirements as stipulated by ACAS. SRUC offers support through the Grievance Policy and Dignity at Work policy to ensure that any potential discrimination, victimisation or harassment can be investigated and addressed. Data on Flexible Working practices at SRUC will continue to be monitored and reported annually under Equality Outcomes through HR MI Reporting.

- **Is there potential to advance equality of opportunity between people who share a characteristic and those who do not**? The Flexible Working Policy applies to all eligible SRUC employees regardless status, however application of the policy advances equality for people with a protected characteristic. For example, a person with a disability may request flexible working to formalise home working to mitigate travelling to the office, this enables working hours to remain. Woman returning from maternity leave may apply for flexible working to reconcile working and caring responsibilities. Similarly, men may seek

to reduce their working hours to care for an elderly relative. Flexible working can be requested regardless of status, however protected characteristics may find this particularly beneficial.

- **Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not?** How can this be achieved? Through promotion of the policy in a fair and consistent manner. There is potential to promote good relations through promotion within the Rainbow Staff Network.

3.3 **Does the policy have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?** In the tables below, record the impact of the policy, as it is planned or as it operates, might have on each equality characteristic and describe what changes in policy or actions will be required to mitigate that impact or to take advantage of a positive impact.

Equality group	**Public sector equality duty**	**Place 'X' in the relevant box(es)**			**Describe the changes or actions (if any) you plan to take.** E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	**Negative impact**	**No impact**	
Age	Potential for discrimination			X	SRUC has seen a large increase in the number of employees applying for flexible working within the 25-34 age range. Before the pandemic flexible working was often seen as a benefit people would apply for if there was a reason to (i.e. caring responsibilities). The change in how SRUC works, hybrid working, has led to an increase of employees who are looking to work flexibly and formalise working agreements agreed through the pandemic.
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					SRUC promotes engagement with the policy to people who identify with this protected characteristic directs employees to alert HR if the policy presents any barriers. The policy is available to all staff at any level. We will continue to promote this policy and monitor uptake, disaggregated by age.
Disability	Potential for discrimination	X			The Flexible working policy uses inclusive language and formatted to promote accessibility. The policy also offers the employee to access alternative formats. The policy will be published with the option of immersive format and accessibility mode. There Is optional provision for all written correspondence in an alternative format or the facility for the employee to provide information in an alternative format if required. The policy refers to the 2010
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					Equality Act in relation to reasonable adjustments. Flexible working is open to all eligible employees, regardless of disability.
Race	Potential for discrimination			X	SRUC includes a statement in the policy to encourage engagement with people of different races and directs employees to alert HR if the policy presents any barriers. We will continue to promote this policy and monitor uptake, disaggregated by race. victimisation or harassment can be investigated and addressed.
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			
Sex	Potential for discrimination	X			93% of Flexible Working requests were made by women between 1 April 2021 and 31 March 2022. This may be in part due to historic ideologies on parenthood and flexible working. There has been a small increase (7% to 13%) of applications from male staff from 2022 to 2023 however this is still low in comparison to staff proportions. All family friendly polices, including Shared Parental Leave and
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					Paternity Leave refer to the Flexible Working policy. The Flexible Working policy makes clear it is open to all employees of SRUC regardless of sex and uses inclusive language throughout. SRUC promotes engagement with the policy to people who identify with this protected characteristic and promotes flexible working to all eligible employees. The policy uses inclusive language. SRUC recognises the access of flexible working is predominantly employees who identify as female. We will continue to promote this policy and monitor uptake, disaggregated by sex.
Gender Reassignment	Potential for discrimination			X	SRUC promotes engagement with the policy to people who identify with this protected characteristic directs employees to alert HR if the policy presents any barriers.
	Potential to advance equality of opportunity			X	
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					The policy uses gender neutral language throughout. We will continue to promote this policy and monitor uptake, disaggregated by gender reassignment.
Sexual orientation	Potential for discrimination			X	SRUC promotes engagement with the policy to people who identify with this protected characteristic directs employees to alert HR if the policy presents any barriers. To foster good relations, there will be further promotion of the flexible working policy to the LGBTQI+ employees through links with the staff rainbow network. We will continue to promote this policy and monitor uptake, disaggregated by sexual orientation.
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			
Religion or Belief	Potential for discrimination			X	SRUC promotes engagement with the policy to people who identify with this protected characteristic directs employees to alert HR if the policy presents any barriers.
	Potential to advance equality of opportunity			X	
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
Pregnancy or maternity	Potential for discrimination	X			The Flexible Working policy is promoted throughout the maternity leave policy and managers guidance at all stages of pregnancy and maternity leave. Most employees requesting flexible working do not have caring responsibilities. 11.1% of flexible working requests between 1 April 2021 and 31 March 2022 were made upon return from maternity leave. Flexible Working can help employees reconcile work and caring responsibilities consequently fostering good relations for this group. SRUC promotes engagement with the policy to people who identify with this protected characteristic directs employees to alert HR if the policy presents any barriers.
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			
Marriage or civil partnership	Potential for discrimination			X	SRUC has seen a percentage decrease in employees who are married, 2022 at 63%, decreased in 2023 to 44%. And a
	Potential to advance equality of opportunity	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
(in employment only)	Potential to foster good relations	X			significant increase of employees declaring their marital status to single and living together, from 11% to 23% and 19% to 23% respectively. The increase also shows the shift in attitudes around flexible working following the pandemic and the increased drive for work life balance.

3.4 Think about and describe below how your assessment impacts on your policy review/ development timeline including but not limited to:

- Procurement criteria: do you need to include specific equality criteria as part of the technical specification ?
- Communication plan/ products: do you need to communicate with people affected by this policy/ practice/ service/ process in a specific format (e.g. audio, subtitled video, different languages)?
- Cost: do you propose any actions because of this assessment which will incur additional cost?
- Resources: do the actions you propose require additional or specialist resource to deliver them?

3.5 Record the outcome of this assessment below having considered the potential or actual impacts of your policy/ practice/ process/ service on equality groups. Choose from one of the following (mark with an X or delete as appropriate):

Note: You must take action to remove barriers or take advantage of positive opportunities BEFORE the policy goes live.

Please select (X)	Implications for the policy/ practice/ process/ service
X	**No major change:** Your assessment demonstrates that the policy service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.
	Adjust the policy: You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy when implemented.
	Continue the policy: The policy will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.
	Stop and remove the policy: The policy will not be implemented due to adverse effects that are not justified and cannot be mitigated.

4 Monitoring policy impact and further actions

It is important to continue to monitor the impact of your policy/ practice/ process/ service on equality groups to ensure that your actual or likely impacts are those you recorded. Your monitoring information will also inform a future review of the policy.

4.3 Record in the table below how you intend to monitor the impact of this policy/ practice/ process/ service on equality groups. In the table below you should:

- list the relevant measures,
- Identify who or which team is responsible for implementing or monitoring any changes
- Where the measure will be reported to (e.g. committee, ELT, Board) and how often.

Measure	Lead department/ individual	Reporting (where/ frequency)
Flexible Working uptake disaggregated by protected characteristic.	HR Data	Annually
Flexible Working uptake following return from Maternity/Paternity/Shared Parental Leave disaggregated by protected characteristic.	HR Data	Annually

4.4 Record further actions or changes required after the policy is implemented in the table below. Make it clear if there are no outstanding actions.

Action	Lead department/ individual	Action target date
Recording Flexible Working Request outcomes	HR Advisor	End of March 2023
Recording of employees who have had a Flexible Working Request rejected at discussion phase	HR Team – Advisors/Business Partners to report on respective areas	End of March 2023 and ongoing

5 Sign off and future review

Equality impact assessments must be signed off by the relevant Head of Service/ Department, even where an EqIA is not required. Also note here when you plan to review the policy and accompanying EqIA which should be no later than 5 years from policy implementation.

5.3 Senior Responsible Owner/ Committee sign off.

Job/ Committee title: Chief People Officer
Date: 14/03/2024

5.4 Equality impact assessment review date.

Date: 14/03/2029

Important: You must send the final version of this equality impact assessment to:

- **the Equality Diversity & Inclusion Lead.**
- **the Communications team for publication on SRUC's equality page on the external website.**

Document control	
Document control:	V0.1
Date policy live from:	01/04/2023
Review/ Approval Group:	Human Resources
Last reviewed:	01/04/2023
Review cycle:	No more than five years

Document change log		
Version/ Author	Date	Comment
V0.1 / Senior HR BP	01/04/2025	