

UK DOMESTIC ABUSE POLICY

The Company understands that domestic abuse comes in many forms and can have a major impact on a person's life, both at home and at work.

The purpose of the Policy is to provide clear guidance to employees on the support available within the workplace for those who have experienced domestic abuse.

We understand that the workplace can often be a safe haven for employees who are suffering domestic abuse, and therefore the Company remains committed to supporting all employees who experience domestic abuse in ensuring they can seek the help and support that they need, while being supported by the Company wherever reasonably possible. The Company understands the risks that employees may place themselves in by informing the Company of this abuse. The Company will therefore handle this information sensitively and confidentially, and, where appropriate and safe to do so, the employee will be informed if such information needs to be shared with additional parties.

Employees are therefore encouraged to be careful with any request for information from customers/clients/suppliers/visitors/etc regarding a colleague. This includes details about an employee's whereabouts, shift times, personal contact information, etc.

This Policy sets out the approach that the Company will adopt for employees experiencing domestic abuse and the support available to those who may have experienced domestic abuse. While this Policy provides details of support available within the Company, the Company will engage with and be led by the employee on any support that the employee wishes to access.

Any employee who wishes to take time off work in relation to domestic abuse should notify the designated person as soon as reasonably practicable of their intention to take time off.

SCOPE OF THE POLICY

This Policy applies to all employees of the Company. Employees experiencing domestic abuse may request time off work to access support and services, manage matters arising from domestic abuse, or take steps to ensure their safety or the safety of a relevant person.

No employee will be treated adversely for making a disclosure of domestic abuse, requesting support under this Policy, or accessing agreed workplace arrangements or leave. Any concerns relating to attendance, performance or conduct will be considered fairly and in the context of the individual circumstances.

KEEPING COLLEAGUES SAFE

Employees must take particular care not to disclose information that could compromise a colleague's safety. This includes an employee's whereabouts, shift times, work location, personal contact details, travel arrangements or whether they are present at work. Requests for this information from customers, clients, suppliers, visitors or any other third party should not be answered unless the employee is authorised to do so and there is a legitimate reason for the disclosure.

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DEFINITIONS

For the purposes of this Policy, domestic abuse has the meaning given to it in the Domestic Abuse Act 2021 and includes, but is not limited to, physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological, emotional or other abuse.

Perpetrator / Person Personally Connected to the Employee

For the purposes of this Policy, “personally connected” has the meaning given to that term in section 2 of the Domestic Abuse Act 2021.

Person the Employee is Supporting

Where an employee requests leave under this Policy to assist a relevant person to access or obtain support in connection with domestic abuse, the relevant person may include, but is not limited to, the employee’s spouse, civil partner, partner, child, dependent or another person with whom the employee has a close personal or family relationship, depending on the circumstances.

Designated Person

A designated employee within the Company who has a primary role in the Company in responding to disclosures of domestic abuse. An employee who may benefit from employer support under this Policy is encouraged to raise the issue with the designated person. The designated person within the Company is Alan Reilly, UK HR Manager.

This designated person has received appropriate training on responding to disclosures, the provisions of the Policy, and their limits in providing support. The role of this person will be to listen and support the employee in making their own decisions on the matter and provide details of practical supports as appropriate.

The number and distribution of trained designated persons will be regularly monitored to ensure that appropriate expertise is maintained and any expertise lost through staff turnover is replaced.

EXAMPLES OF DOMESTIC ABUSE

The Company recognises that domestic abuse comes in many forms. It can be any one, or a combination, of the following:

- ▶ Emotional abuse
- ▶ Economic abuse
- ▶ Sexual abuse
- ▶ Physical abuse
- ▶ Controlling or coercive behaviour
- ▶ Violent or threatening behaviour

Please note that this is a guidance list and does not constitute an exhaustive list.

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RECOGNISING POTENTIAL SIGNS OF DOMESTIC ABUSE

Domestic abuse may not always be obvious, and there is no single sign that confirms that an employee is experiencing abuse. However, possible workplace indicators may include unexplained changes in attendance, performance or concentration; increased anxiety or changes in behaviour; repeated or unwanted calls, messages or visits; a partner or other person repeatedly contacting the workplace; unexplained injuries; reluctance to leave work; or unusual concern about work patterns, location or personal information being shared.

These indicators do not necessarily mean that domestic abuse is taking place. Employees and managers should not make assumptions, attempt to diagnose the situation or investigate the suspected abuse themselves.

WHERE A MANAGER HAS CONCERNS

Where a manager has concerns about an employee's wellbeing but the employee has not disclosed domestic abuse, the manager should arrange a private and sensitive conversation where it is safe and appropriate to do so. The manager should focus on the behaviours or changes they have observed, without making assumptions about the cause, ask whether the employee requires any support and remind them of the support available under this Policy.

An employee should not be pressured to disclose domestic abuse or provide details they do not wish to share. If a disclosure is made, the manager should listen without judgement, avoid investigating or attempting to resolve the abuse, and refer the employee to the designated person or other appropriate support in accordance with this Policy. Where there is an immediate or serious safety concern, the manager should follow the escalation and emergency arrangements set out in this Policy.

MAINTAINING CONFIDENTIALITY

It is important that any disclosure or report of domestic abuse is handled sensitively and confidentially. Information relating to a disclosure of domestic abuse will only be shared where there is a legitimate and necessary reason to do so, taking account of the safety and wellbeing of the employee and others, applicable data protection requirements, safeguarding responsibilities, and any legal or regulatory obligations.

The improper handling of information relating to domestic abuse could have serious consequences for an employee, including potentially increasing risks to their safety. Information relating to a disclosure or report will therefore be shared only where necessary and proportionate, and with those who need the information for a legitimate purpose. This may include taking steps to protect the safety and wellbeing of the employee or others, implementing agreed workplace support or safety measures, administering leave or other workplace arrangements, complying with safeguarding responsibilities, or where disclosure is required or permitted by law or by a court or other lawful authority.

Only information that is necessary for the relevant purpose will be shared, and it will be handled securely. Where appropriate and safe to do so, the employee will be informed about proposed information sharing and the reasons for it. However, there may be circumstances where information needs to be shared without the employee's consent or without prior notification, for example where there is a legal obligation to disclose information or where this is necessary to protect someone from serious harm.

Any absence or leave granted under this Policy will be recorded in accordance with the Company's normal absence and payroll procedures, with appropriate measures taken to protect the confidentiality of information relating to domestic abuse. Access to records will be restricted to those who need the information for legitimate employment, payroll, safeguarding, legal or management purposes.

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MAINTAINING CONFIDENTIALITY (CONTINUED)

The Company will ensure that personal information relating to domestic abuse is collected, recorded, used, stored and shared only where necessary and in accordance with applicable data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, together with the Company's Data Protection Policy. Particular care will be taken with information concerning an employee's health or other special category personal data, where applicable.

Where information needs to be shared, the Company will consider the potential impact on the employee and will, where it is safe and appropriate to do so, discuss the information-sharing decision with the employee in advance. The Company will seek to ensure that information is shared only with those who need it, is accurate and up to date, and is shared securely.

Employees should speak with the designated person if they have any concerns about the confidentiality or handling of information under these processes.

HOW TO ACCESS LEAVE UNDER THIS POLICY

Any employee who has experienced domestic abuse and wishes to access support under this Policy should contact the designated person, or another appropriate HR representative or manager where contacting the designated person is not appropriate or safe.

The designated person will, where appropriate and safe to do so, arrange a private meeting or other suitable method of communication with the employee to discuss the matter and provide information about the support available.

The designated person will listen without judgement and seek to respect the affected employee's decisions. They will handle information relating to the disclosure in accordance with this Policy and applicable data protection requirements, keep appropriate records of the disclosure and any support measures agreed, discuss safety and wellbeing needs with the employee, and agree, where appropriate, a safe method and frequency of communication following the disclosure.

The designated person will offer the affected employee information on internal support, as well as information on external specialist domestic abuse services which may be better equipped to provide the sustained and specialist support they may need. It is not the role of any individual in the workplace to investigate or deal with the abuse itself.

Employees will not normally be required to provide documentary evidence of domestic abuse in order to request support or leave under this Policy. The Company may, however, ask the employee for sufficient information to understand the support or workplace arrangements requested and, where applicable, to determine whether the employee meets the requirements for leave under this Policy. Any information requested will be proportionate to the circumstances and handled appropriately.

Any employee who wishes to request leave under this Policy should notify the designated person as soon as reasonably practicable of their intention to take leave. Where circumstances involve an immediate safety concern or emergency, the Company will take account of the employee's circumstances where advance notice is not reasonably possible.

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SUPPORT AVAILABLE

The Company may offer appropriate support to an employee experiencing domestic abuse, depending on their individual circumstances. This may include changes to the method or timing of salary payments where appropriate, additional workplace safety measures, referrals to specialist support services, changes to working arrangements, and time away from work.

Leave under this Policy will normally be unpaid unless otherwise agreed by the Company or where another applicable Company policy or statutory entitlement provides otherwise.

The purpose of leave under this Policy may include enabling the employee to:

- ▶ Seek medical attention or healthcare.
- ▶ Access a specialist domestic abuse or other specialist support service.
- ▶ Obtain psychological or other professional counselling or support.
- ▶ Relocate temporarily or permanently.
- ▶ Seek legal advice or assistance.
- ▶ Apply for or attend proceedings relating to a protective order or other legal remedy.
- ▶ Report domestic abuse to, or seek assistance from, the police.
- ▶ Attend appointments with housing, safeguarding or other relevant services.
- ▶ Take other reasonable steps relating to the employee's safety, wellbeing or circumstances arising from domestic abuse.

Following a disclosure, the designated person will, where appropriate, discuss with the employee any safety concerns relating to the workplace, travel to and from work, contact from the person alleged to have caused the abuse, or other work-related circumstances. Depending on the individual circumstances, appropriate safety measures may be implemented, taking account of the employee's wishes, the safety of others and the Company's legal and safeguarding responsibilities.

Where appropriate, the employee will be supported with access to a safe physical space and/or a safe method of communication from which to contact relevant services. The Company may also agree appropriate methods of communicating with the employee where there is a concern that normal methods of communication may not be safe.

For any other support, please speak with your manager or the designated person to discuss this further.

CONDUCT IN THE WORKPLACE

If a colleague discloses to you that they are experiencing domestic abuse, you should listen without judgement, take the disclosure seriously and, where appropriate, provide them with a copy of this Policy or details of the designated person.

Information relating to a disclosure should be treated sensitively and handled in accordance with the confidentiality and information-handling provisions of this Policy. Employees should not investigate allegations of domestic abuse themselves or attempt to mediate between the employee and the person alleged to have caused the abuse.

Where appropriate, the employee should be encouraged to access support from the designated person or a specialist domestic abuse service. There may, however, be circumstances where information needs to be shared with an appropriate person within the Company, without the employee's consent, for example where there is a serious concern about the safety or wellbeing of the employee or another person, a safeguarding concern, or a legal or regulatory requirement to disclose information.

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CONDUCT IN THE WORKPLACE (CONTINUED)

Employees must not disclose personal information about colleagues to any person outside of the Company unless they are authorised to do so and there is a legitimate reason for the disclosure. Particular care should be taken with information that could reveal an employee's location, contact details, working pattern, work location, travel arrangements or whether they are present at work.

Employees who knowingly or negligently disclose confidential or personal information about a colleague in a manner that could facilitate domestic abuse or place that colleague at risk may be subject to disciplinary action in accordance with the Company's disciplinary procedures.

Where both parties work for the same Company, or at the same work location, and domestic abuse has been reported or is alleged to have occurred, particular arrangements may be put in place. These may include changes to working arrangements, shifts, reporting lines, work locations, communication arrangements, access arrangements or other appropriate safety measures.

The safety and wellbeing of those affected will be given appropriate consideration, while also recognising the rights of fair procedures for all involved. Any investigation or disciplinary process will be conducted in accordance with the Company's relevant policies and procedures.

Employees will be held accountable for their conduct in the workplace. Where domestic abuse, harassment, threatening behaviour or other inappropriate conduct is committed by an employee during working time, on Company property, or through Company equipment or systems, including work phones, laptops, email or messaging systems, the Company may invoke its disciplinary procedures. This may result in disciplinary sanctions up to and including dismissal, where appropriate.

The Company may also refer matters to the police or other appropriate authorities where this is necessary or appropriate.

WORK IMPACT

Domestic abuse may affect an employee's attendance, performance, concentration, wellbeing and ability to work.

Where an employee discloses domestic abuse, the Company will seek to provide appropriate support and may consider reasonable and proportionate adjustments to working arrangements, workload, attendance arrangements, working hours, shifts or work location, depending on the individual circumstances.

Any performance or attendance concerns will be considered fairly and in the context of the employee's circumstances, while maintaining appropriate performance and attendance standards.

Employees are encouraged to speak with their manager or the designated person if domestic abuse is affecting their ability to work or their attendance, so that appropriate support can be considered.

POLICY REVIEW

The Company has provided a list of professional support services detailed below. This is a guidance list only and should not be considered an exhaustive list of support services available.

This Policy should be read alongside the Company's other relevant policies, including its Harassment and Bullying Policy, Equality, Diversity and Inclusion Policy, Disciplinary Policy, Grievance Policy, Absence Policy, Flexible Working Policy and Data Protection Policy, and any applicable Safeguarding Policy.

The Company will regularly review and monitor this Policy to ensure that it remains appropriate and reflects changes in legislation, guidance, best practice and the Company's procedures.

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SPECIALIST SERVICES AND WORKPLACE CONTACTS

SPECIALIST DOMESTIC ABUSE SERVICES

The following organisations provide specialist support to people experiencing domestic abuse and related forms of abuse. This list is provided for guidance and is not exhaustive. Employees may also contact the designated person for information about other sources of support.

National Domestic Abuse Helpline

The National Domestic Abuse Helpline, run by Refuge, provides free and confidential support and information to people experiencing domestic abuse, as well as people supporting someone experiencing domestic abuse. The helpline is available 24 hours a day, 7 days a week.

- ▶ 0808 2000 247
- ▶ <https://www.nationaldahelpline.org.uk/>
- ▶ <https://refuge.org.uk/>

Men's Advice Line

The Men's Advice Line provides confidential advice and support for men experiencing domestic abuse and those supporting them.

- ▶ 0808 801 0327
- ▶ <https://mensadvice.org.uk/>

Local Domestic Abuse Services

Specialist domestic abuse services are available across England and Wales. Details of local and specialist support services can be found through the following resources:

- ▶ <https://www.gov.uk/government/publications/domestic-abuse-get-help-for-specific-needs-or-situations/domestic-abuse-specialist-sources-of-support>
- ▶ <https://safelives.org.uk/>

Rape Crisis England & Wales

Rape Crisis England & Wales provides specialist support for people affected by rape, sexual assault and sexual violence. Its 24/7 Rape & Sexual Abuse Support Line provides free and confidential support by telephone and online chat.

- ▶ 0808 500 2222
- ▶ <https://rapecrisis.org.uk/>
- ▶ <https://247sexualabusesupport.org.uk/>

Galop – LGBT+ Domestic Abuse Support

Galop provides specialist support for LGBT+ people experiencing domestic abuse and other forms of abuse and violence.

- ▶ 0800 999 5428
- ▶ <https://www.galop.org.uk/>

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SPECIALIST SERVICES AND WORKPLACE CONTACTS

SPECIALIST DOMESTIC ABUSE SERVICES (CONTINUED)

Further Specialist Support

Further specialist services are available for particular circumstances or types of abuse, including support relating to children and young people, economic abuse, stalking, forced marriage, honour-based abuse, disability and immigration.

Further information and specialist sources of support can be found at:

- ▶ <https://www.gov.uk/government/publications/domestic-abuse-get-help-for-specific-needs-or-situations/domestic-abuse-specialist-sources-of-support>

Emergency Assistance

If someone is in immediate danger or there is an emergency, call **999**.

If it is not safe to speak when calling 999 from a mobile phone, remain silent when prompted and press **55** to be connected to the police.

WORKPLACE CONTACTS

Primary Domestic Abuse Contact

- ▶ Alan Reilly, UK HR Manager | areilly@rgis.com

Alternative Domestic Abuse Contact

- ▶ Sarah White, Employee Relations Manager | swhite@rgis.com

OUT OF HOURS EMERGENCY CONTACT

Where an employee requires urgent workplace support in relation to domestic abuse outside normal working hours and it is not reasonably practicable to contact one of the designated persons, they may contact their District Manager. The District Manager will respond sensitively, prioritise the employee's immediate safety and wellbeing, and, where appropriate, assist in contacting the designated person or other appropriate support.

The District Manager is not expected to provide specialist domestic abuse advice or investigate allegations. Information disclosed will be handled sensitively and confidentially in accordance with this Policy and will only be shared where necessary and proportionate, including where there is a serious or immediate risk to the employee or another person, or where there is a legal or safeguarding requirement to do so.

IMMEDIATE EMERGENCY

If you or another person is in immediate danger, call **999**.