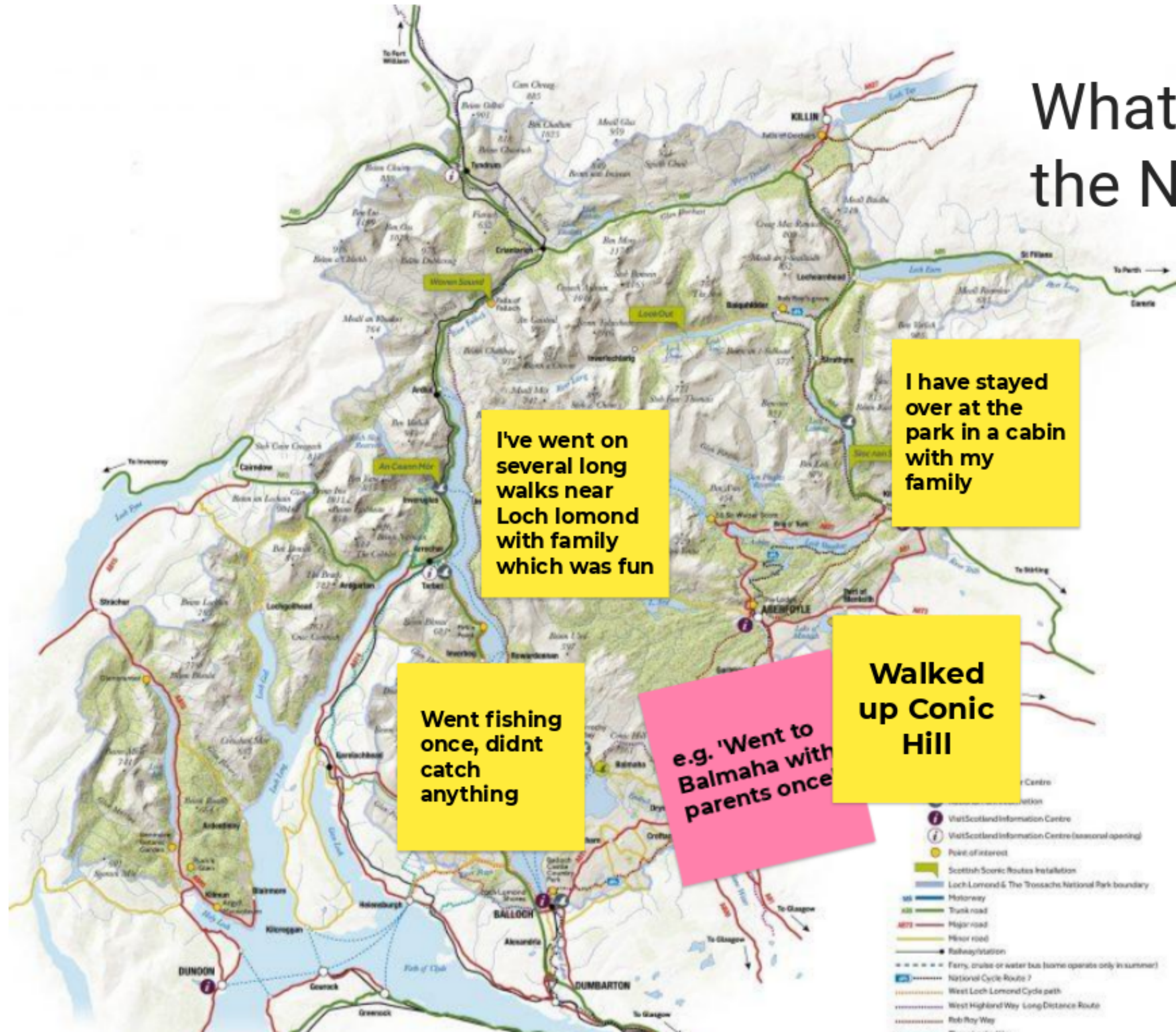


What's your experience of the National Park so far?



Do you think the National Park is LGBT friendly and inclusive?

**It's OK if you don't
have any experience
of the National Park
- we could focus on
what makes any
outdoor spaces
LGBT safe,
welcoming and
inclusive instead**



What can we do to make it LGBT inclusive and welcoming?

Any ideas on steps we can take? Ideas can be really broad, bold, simple, digital, visible, about the physical space or more about the people in the Park

Make the bathrooms gender neutral

Educate the staff on LGBTQ+ lives

Discussion on putting up posters - to raise awareness for LGBT visitors that the National Park has trained staff etc. To be more visible

10 Principles for belonging

Awe

Connection

Community

Environment

Diversity

Working with the 15 National Parks to build a collective vision for increasing Diversity in Parks and making them accessible, safe and welcoming places. Any thoughts?

Welcome

Creativity

Roots

Legacy

Wellbeing

Comment on Diveristy - linked to the diversity in nature, and diversity of everyone on the planet / the visitors and different communities who visit the Parks etc.

Question around Wellbeing - was this mental health, physical health, or keeping people safe ?

Co-designing visits to the National Park for 2025

What would fun and engaging visits to the Park look like for you all? What would you like to do / learn about / where do you want to go / visit?

Make leaf art and go foraging

Make art to go up in the park

Pagan festivals

Witch trials

We talked about going camping, star watching and experiencing the wilder parts of the National Park



We won't have time to cover everything today, so any ideas we ran out of time to discuss can be added here - then we can come back and look at them at another time.

LGBTQ history and history of the park, gender neutral bathrooms but also helping others to know information about gender and sexuality

The Park Bench - for stuff we didn't have time to cover but want to come back to it another time

From: [REDACTED]
To: "Pride Outside"
Subject: RE: LGBTQ+ Inclusion Work
Date: 19 March 2025 13:22:30
Attachments: [Camping Kit Loan Scheme - Frequently Asked Questions V2.docx](#)
[Camping Kit Loan Scheme - Health and Safety information for groups borrowing camping kit.docx](#)
[Map of \[REDACTED\] Campsite \(1\).jpg](#)
[Camping Kit Library - Group Booking Form.docx](#)
[LTNPA Equality Outcome slides 10.02.25.pdf](#)

Hi [REDACTED]

Hope you are well and managing to make the most of this lovely spring sunshine. It was really lovely to meet with you a few weeks back and apologies it has taken me this long to email! Nik and I really appreciated you taking the time to meet with us and it was also great that we had that recognition from the IOL online workshop!

As promised, I'm sharing the info about our inclusive camping programme which is our project to enable access to our campsites and the loan of our camping kit for those who would benefit from a night under the stars. More info about our camp sites is available here: [Camping - Here. Now. All of us. - Loch Lomond & The Trossachs National Park](#) and we usually recommend [REDACTED] as the most suitable for this type of group experience.

Thanks once again for taking the time to chat to us about our plans and sharing your insights and suggestions for actions related to our Equality Outcomes and wider equality, diversity and inclusion work. As promised, please find attached the slides that we used in the workshop, alongside the feedback survey link:

[https://forms.office.com/\[REDACTED\]](https://forms.office.com/[REDACTED]) we would appreciate you taking the time to fill in. Nik did ask me to share this survey with you a couple of weeks back but it slipped off my radar so apologies about that – it will close at the end of March and should only take about 5 – 10 mins to complete.

Let me know if there was anything else from our chat that I can follow up with at this stage and hopefully there is a future session or Park visit we can assist with, keen to keep connected.

Cheers

[REDACTED]
[REDACTED]
Education and Inclusion Adviser

Loch Lomond & The Trossachs National Park

Direct: 01389 [REDACTED]

www.lochlomond-trossachs.org

[Outdoor Learning Directory](#) - learning materials, grants and training provided by Scottish Government partners

I'm a hybrid worker, based predominantly from home though in our Headquarters as required. [REDACTED]

From: Pride Outside

Sent: 28 January 2025 10:41

To: Nik Turner

Cc: [REDACTED]

Subject: Re: LGBTQ+ Inclusion Work

Hi Nik,

Yes apologies our diary is pretty packed - but always happy to chat and explore other ways we might work together..

Speak soon,

[Click here to find out why we use pronouns in our email signature](#)

Co-CEO

Pride Outside CIC

Creating a world where LGBTQ+ People are Safe and Well

SC660623

We have a new website with **FREE** resources: www.prideoutside.org.uk

Instagram & Facebook: [@prideoutsidecic](https://www.instagram.com/prideoutsidecic)

Linktree: <https://linktr.ee/prideoutsidecic>

Mobile: [REDACTED]

Book a Zoom Meeting with us by clicking [HERE](#)

On Tue, 28 Jan 2025 at 09:22, Nik Turner <[REDACTED]@lochlomond-trossachs.org> wrote:

Hi [REDACTED]

Thanks for much for the message and apologies it's taken me a wee bit of time to come back to you personally. In the meantime, I can see you've received our invite for the Equalities Outcome workshop, so thank you for completing the doodlepoll. We'll be confirming the date for that workshop by the end of this week, but at the moment unfortunately it's looking like the time that suits you, might not suit the majority of others. We'll still forward the invite on just in case anything has changed on your end, and in the meantime I'll set up a 'hello' call through your calendar with my team member [REDACTED] who's the Park's Education and Inclusion Advisor, and myself, so we can connect and put faces to names.

With best wishes,

Nik

Nik Turner (she/her)

Behaviour Change Manager

Managing the Education, Inclusion and Volunteering Team

Loch Lomond & The Trossachs National Park

Direct: 01389 [REDACTED]

www.lochlomond-trossachs.org

I'm a hybrid worker, based predominantly from home though in our Headquarters as required

The content of this email and any attachments is confidential and is subject to the terms of the National Park Authority's email disclaimer at <https://www.lochlomond-trossachs.org/disclaimer> and is intended only for the use of the individual or entity to which it is addressed.

From: Pride Outside [REDACTED]@prideoutside.org.uk>

Sent: 17 January 2025 05:39

To: Nik Turner <[REDACTED]@lochlomond-trossachs.org>

Subject: LGBTQ+ Inclusion Work

You don't often get email from [REDACTED]@prideoutside.org.uk. [Learn why this is important](#)

Hi Nik,

Thank you for reaching out and it sounds like you are doing some great work to make the National Parks more inclusive - we would love to hear more about it as we have recently worked with Scottish Forestry on their LGBTQ+ Inclusion and we know the difference that has made to both their LGBTQ+ staff and volunteers as well as LGBTQ+ visitors.

The best thing to do is to send us the information and the date and we can check for availability, but just to say our diaries are pretty booked up already for the first few months of the year.

We have also contributed and advised several panels and projects over the last few years, from Police Scotland to Scottish Forestry and Scottish Fostering Agency and although bespoke projects like this are costed depending on time commitment and client budget - I have attached our **Training Packages and Price list** to give you an idea of general costings.

Also if you want to connect and chat things through feel free to book in a Zoom meeting with us below:

Book a Zoom Meeting with us by clicking [HERE](#)

Thanks for getting in touch and hopefully speak soon,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[Click here to find out why we use pronouns in our email signature](#)

[REDACTED]

Co-CEO

Pride Outside CIC

Creating a world where LGBTQ+ People are Safe and Well

SC660623

We have a new website with **FREE** resources: www.prideoutside.org.uk

Instagram & Facebook: [@prideoutsidetic](#)

Linktree: <https://linktr.ee/prideoutsidetic>

Mobile: [REDACTED]

Book a Zoom Meeting with us by clicking [HERE](#)

[REDACTED]

The content of this email and any attachments is confidential and is subject to the terms of the National Park Authority's email disclaimer at <https://www.lochlomond-trossachs.org/disclaimer> and is intended only for the use of the individual or entity to which it is addressed.

Project Plan Template

Loch Lomond & The Trossachs National Park Authority
Project Plan (Months) : LGBT Charter

[illegible]

Loch Lomond & The Trossachs National Park Authority Task List : LGBT Charter					
Action	Team Member(s)	Start Date	End Date	Notes	Status See comment for status types
Charter Agreement signed	Nik	March			
Training licence agreement / timeframe		June	July	August for office staff, Sept for Rangers (incl Permanent RS)	
NP Charter Action Plan (produced after the training)		June	Sept	Meeting scheduled for 10th Sept as a Live workshop with key Charter staff to finalise the action plan	
Schedule check in meetings		After briefing meeting		All internal Charter group meetings and LGBT Charter manager meetings are now scheduled in diaries	
Glasgow Pride	P4All	July	20th July	Didn't attend Pride - look to ensure we build up towards attending next year	
Standards outcomes / action plan focussed work - specific plan created	P4All	July	April '25		

Project Management Template

Recommended essential		
No.	Department / Team / Group	Name
1	EIV	
2	EIV	
3	EIV	
4	EIV	
5	EIV	
6	Business Support	
7	EIV	
8	P4All	
9	P4All	
10	P4All	
11	P4All	
12	P4All	
13	P4All	
14	P4All	
15	HR	
16	HR	
17	HR	
18	HR	
19	FOH	
20	FOH	
21	FOH	
22	Business Support	
23	Business Support	
24	Communications	
25	Communications	
26	Communications	
27	Communications	
28	Communities	
29	Communities	
30	Tourism	T
31	Sust. Travel and access	
32	Visitor Mang	
33	Governance	
34	Governance	
35	Governance	
36	Estates	
37	Estates	
38	Estates	
39	Estates	
40	Estates	

No.
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62

All OMs

All Exec -

Recommended essential	
Ranger Team	Name
ELL	
ELL	
ELL	
ELL	
T&B	
T&B	
T&B	
T&B	
West LL	
West LL	
West LL	
West LL	
Boat team	
Boat team	
Boat team	
Boat team	
RTL	
RTL	
RSM	
RSM	
Vis Services Co'd	
Senior Support	

Recommended essential	
No.	Pernanent Seasonal Rangers
63	Pernanent Seasonal Rangers
64	Pernanent Seasonal Rangers
65	Pernanent Seasonal Rangers
67	Pernanent Seasonal Rangers
68	Pernanent Seasonal Rangers
69	Pernanent Seasonal Rangers
71	Pernanent Seasonal Rangers
72	Pernanent Seasonal Rangers
73	Pernanent Seasonal Rangers
74	Pernanent Seasonal Rangers
75	Pernanent Seasonal Rangers
76	Pernanent Seasonal Rangers
77	Pernanent Seasonal Rangers
78	Pernanent Seasonal Rangers
79	Pernanent Seasonal Rangers
80	Pernanent Seasonal Rangers

[illegible]

Training licence - 100
target - 50% of licences completed
50 Staff = Bronze
on what our target is for accreditation,

173 FTE

To achieve **bronze**, we have to train
Bronze scenario: all in the recommen

To achieve silver, we have to train 5
Silver scenario: bronze plus 32 others

25% of our staff = 43 staff members

ided essential plus permanent RS = 54

50% of our staff = 86 staff members

Voluntary sign up for spare licences		
No.	Department / Team / Group	Name
81	Sust. Travel and access	
82	Land Use	
83	Information Services	
84	Information Services	
85	Tourism	
86	Engagement & Innovation	
87	Comms	
88	Corporate performance	
89	Information Services	
90	Information Services	
91	Development Planning	
92	Development Planning	
93	Communiites and place planning	
94	Estates	
95		
96		
97		
98		
99		
100		

Max 100 training licences

Charter no.	Charter standard
	Charter leadership
1.1	Baseline survey completed
1.2	Champion Group identified
1.3	Quarterly Champ group meetings held
1.4	Undertake consultation which assesses the needs of LGBTQ+ people in your service/area of work.
1.5	Action plan developed based on evidence and/or learning from consultation
	Training
2.1	25% staff to complete the online awareness training
2.2	Wider staff to receive briefing / key lessons from above training
	Policy
3.1	Policies must meet the standards set out un the Equality Act (2010) and Human Rights Act (1998)

3.3	Undertake an impact assessment of your service/work area specifically in relation to LGBTQ+ people
	Practice
4.1	Undertake at least 1 campaign which directly addresses prejudice and discrimination
4.2	Undertake activities which involve engaging with LGBTQ+ communities
4.4	Undertake activities/ mark commemorative days etc relevant to LGBTQ+ people
4.5	Provide evidence of referral mechanisms or signposting to relevant LGBTQ+ organisations
	Visibility
5.1	Website includes links to LGBT Youth Scotland and other relevant LGBTQ+ organisations
5.2	Posters and promo materials for LGBT YS and other relevant orgs. Made available for staff and service users
5.3	LGBT charter poster displayed in HQ
5.4	Staff, key partners and service users made aware of our charter journey
	Monitoring and evaluation

6.4	Compile end evaluation and identify next steps in your LGBT Charter journey
-----	--

Agreed actions as per P4A meeting on the 11.12.24	Notes 20.03.25
complete	
complete	
maintain existing schedule of meetings / if required roll into P4A business. Upload meeting agenda/ minutes as evidence of these. Prog in further sessions.	
On track - [REDACTED] had a session with LGBT Youth [REDACTED] to get their feedback on needs of LGBT visitors and developing an offer for summer for them. We will also reach out to Pride Outside to invite them to our Equalities Outcomes workshop.	
This column confirms the actions we are able to take. This will need to be verified with [REDACTED]	
complete	
Key lessons from the training to be shared at the same time that we do the campaign posts internally via Park Central, see row 15.	Outcomes/learnings to be shared with 70% of staff [REDACTED] to share charter slideshow on Park Central Nik: EqIA training to refer to slideshow
[REDACTED] to review but potential to complete within our own language. HR alignment with Cairngorms not possible as they did not have this requirement within their standard. Aim for Q4 24-25. <i>Additional guidance from [REDACTED] 10.01.25: 3 pieces of evidence across policy area - e.g. recruitment, parental leave. Can also use on overarching policy if required. Should reference the Equality Act and 9 protected characteristics need to be referenced. Specific reference to LGBT+ people. EG ref. diverse family structures in family / parental policies. EG uniform: folks are able to meet the requirements as suits their identity.</i>	[REDACTED] sent different policies to ops managers to review Leave policies maybe need reworded (replace with "other parent" instead of biological father/mother, etc.) Sexual harassment /bullying (dignity at work) policy may be able to be uploaded directly to the charter - wording clear around trans/homophobia

able to provide the examples from Tarbet phase 1 and potential for phase 2, as evidence we as standard consider the needs of LGBTQ+ people through our EqIA scheme. to upload into the evidence folder. <i>Additional notes from 10.01.25 - would like to see the Tarbet example.</i>	has updated examples with photos, etc. at Tarbet (new improved terrain/accessible gradients, new picnic tables, accessible reinforced matting)
Plan to do a series of posts over LGBT history month internally, to include: summary of learnings from the training (row 11) Explain prejudice and why that's not acceptable in the NP Include link to our own staff support mechanisms Highlight local pride communities and Pride Outside as relevant local organisations	LGBT history month has now passed - need to have a look at another theme/focus for later in the year
summer outreach activity for LGBT youth group should fulfil this (on top of the intro / needs session held online in row 7.)	Nik and to follow up with Stirling Pride (20th September) Plan some key dates and posts
Start with LGBT history month. Then again in the Pride months - June-Aug.	to liaise with comms team to see what dates/topics would like to focus on for internal calendar/Park Central
See row 16, will be incorporated into the campaign	Could be QR codes/posters Potentially promoting Pride Outside, other wellbeing communities Changing "owner" of this action to (HR)
Cannot promote LGBTYS but can still promote other organisations as part of wider comms. To be agreed by comms on timing.	
Create our own, to be ready for Feb for LGBT history month. Not to promote LGBTYS and for internal staff boards. <i>Can also be on Park Central / wellbeing hub so digital is acceptable - still can be used as evidence. Focus on LGBT inclusive imagery not the 'brand'.</i>	- Nature Heroes campaign?
unable to promote LGBTYS when under legal challenge Update from <i>Can plan for this later in the year, in readiness for legal challenge to be concluded if possible (early Sept is our deadline)</i>	PAUSED
unable to promote LGBTYS when under legal challenge Update from <i>it is important to focus on the impact on the community and why we are focussing on LGBTQ+ community. Demonstrate change and impact, and be ready for poss conclusion of legal challenge so we can complete this standard. Further review later in Q2 (Aug)</i>	PAUSED

There is a link to the LGBT Charter End Evaluation Form on the portfolio for LLTNPA.
This must be filled in by clients as their final standard.

Status	Ideas / suggested action/s to deliver this	Owner	Offers of support
complete	N/A		
complete	Confirm during briefing meeting that all P4A members are our champs, and in email after. Save email as evidence.		Nik
in progress / on track	Schedule, confirm dates in above summary email.		Nik
complete			Nik,
in progress / on track	Add our actions to all columns here		Nik
complete	Training group drafted Agree with P4A any additions to that list Reach out to OMs / individuals Open offer of training for anyone else who'd like to do it		Nik
in progress / on track	General awareness raising Park Central post near start of journey & resources for staff who didn't do the training. Post on Park Central - needs to reach 70% of staff	to take key lessons and provide to comms	
in progress / on track	ID relevant policies for review (3 required) Review, amend if necessary. Must have reference to the equalities and human rights acts and be non-gendered. Suggestion from homophobia, biphobia and transphobia should be stated as unacceptable.		Nik

in progress / on track	Review recent EqIAs completed, assess inclusion of LGBTQ+ impacts		
yet to be started	this can be internal / for staff eg antibullying week	Comms - /	
in progress / on track	Likely to be delivered through outreach project work but other ideas welcome		
yet to be started	3-4 activities of specific commemorative dates eg pride, days of visibility, can be internal	Comms - /	Jane
yet to be started	Any mechanism that someone can use to access wider support - QR codes on a poster that link to a staff wellbeing resource for example.	HR	
yet to be started	Relevant blog, not tagged to LGBT Scotland (this could be included in December bulletin)	/	
yet to be started	LGBT welcoming materials in the office.	/Paul	Jane, Front of House Team
PAUSED			
PAUSED	Above blog 10:02 Park Central posts above		

yet to be started - end of Charter (Sept)	Next Steps template is also available.		
---	--	--	--

	Update and links to evidence			
Anticipated completion date	Briefing meeting	Meeting 1 - Sept	Meeting 2 - Dec	Meeting 3 - March
		Live Action Workshop - 23rd Sept	Uploaded to evidence portfolio	Uploaded to evidence portfolio
		Meeting with LGBT Youth - [REDACTED]	Uploaded to evidence portfolio	
		Off based staff - Aug. RS - Sept. Numbers confirmed completed after Sept	58 staff completed training - uploaded to evidence portfolio	
		After Action plan is completed		
Mar-25				

				Copy of EqIA copied into project folder. Suggest partnering with copy of the Mainstreaming Report Tarbet case study to show what the outcome looks like "in action" - docs in folder

--	--	--	--	--

Meeting 4- 3rd June	Meeting 5 - 4th Aug - pre submission of evidence on 22nd	Meeting 5 - Sept - pre submission of evidence on 22nd
Agenda to be sorted		
has uploaded a copy of this Action Plan tracker to the portfolio		
has started work on 3 Policies: Dignity at Work / Draft Equalities & Inclusion / Maternity		

		End evaluation and next steps to be completed before 22nd Sept
--	--	---

Project Management Template

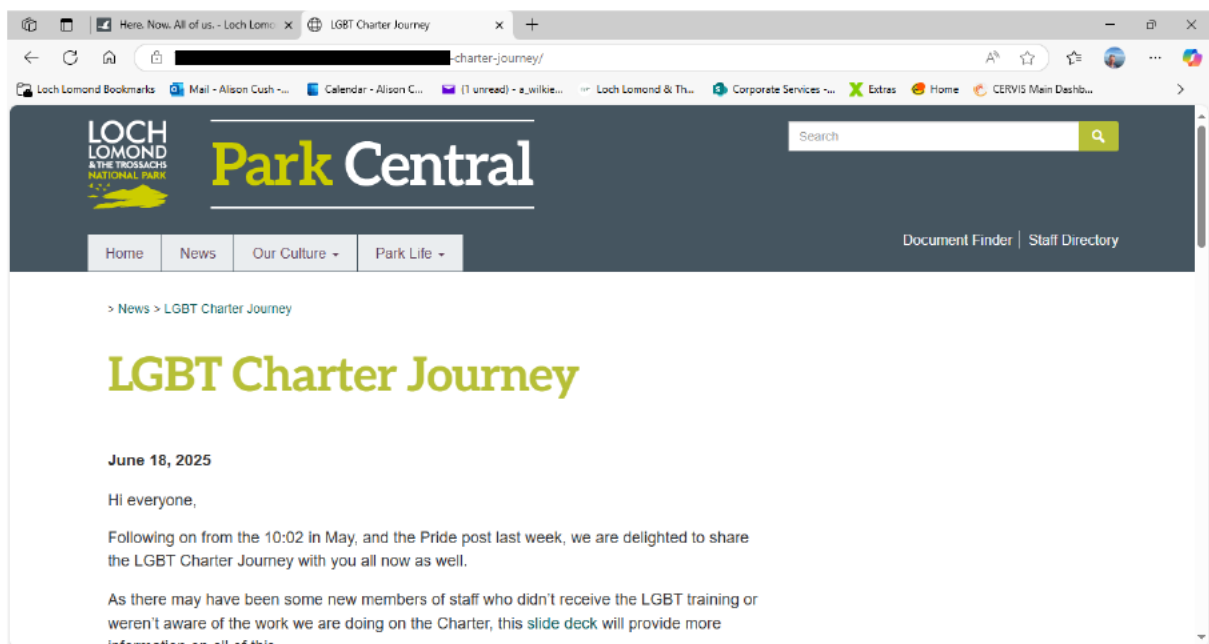
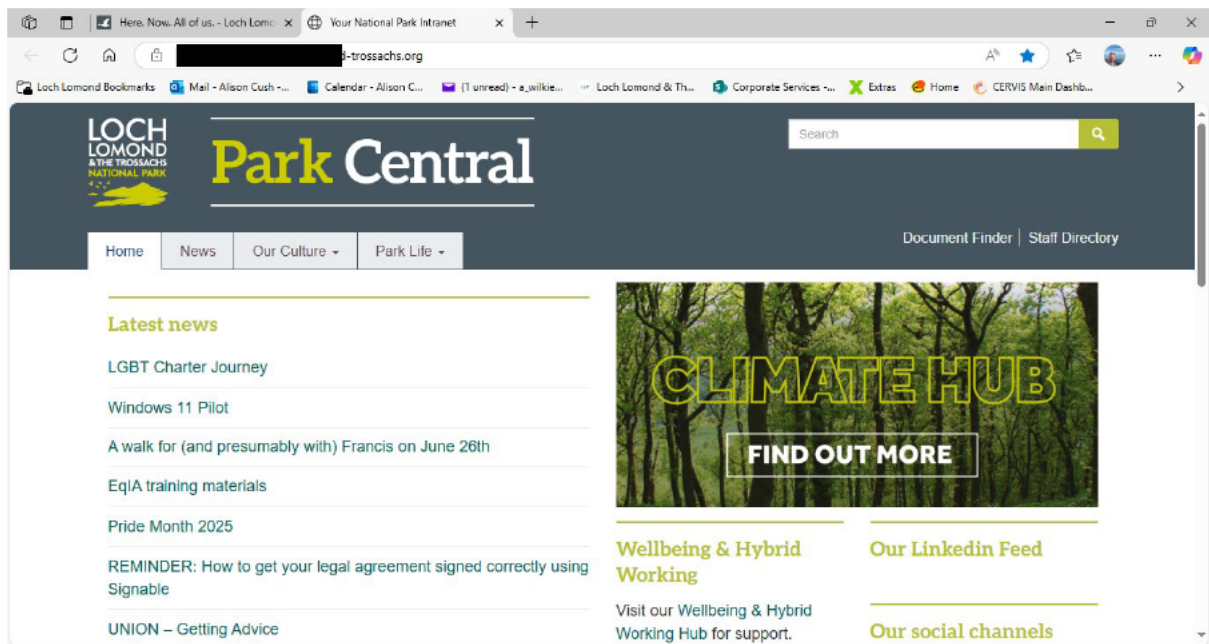
Task Activity	Start	Finish	Resource Names
Training - licence uptake / 30 days timeframe and target to reach	June	July	
Action Plan priorities	July	Sept '25	
All Staff Briefing	Feb		
Portfolio - evidence uploaded to charter portfolio	Ongoing	Sept '25	
Standards focussed work (depending on Charter level - tbc)	Ongoing	Sept '25	

Note: Best to group by high level Activity

ID	Name	Course Completion
18574		Completed
18262		Completed
18277		Completed
18187		Completed
18211		Completed
18298		Completed
18304		Completed
18256		Completed
18580		Completed
18461		Completed
18200		Completed
18237		Completed
18230		Completed
18275		Completed
18236		Completed
18287		Completed
18274		Completed
18299		Completed
18215		Completed
18243		Completed
18245		Completed
18257		Completed
18261		Completed
18252		Completed
18600		Completed
18232		Completed
18269		Completed
18303		Completed
18194		Completed
18629		Completed
18229		Completed
18227		Completed
18478		Completed
18244		Completed
18509		Completed
18296		Completed
18212		Completed
18307		Completed
18255		Completed
18226		Completed
18270		Completed
18310		Completed
18481		Completed
18469		Completed
18514		Completed
18268		Completed
18491		Completed
18238		Completed
18280		Completed

18214		Completed
18376		Completed
18234		Completed
18508		Completed
18201		Completed
18251		Completed
18190		Completed
18618		Completed
18278		Completed
18468		Not completed
18420		Not completed

Completed	58
Not completed	2



Here. Now. All of us. - Loch Lomond & The Trossachs National Park

LGBT Charter Journey

Loch Lomond Bookmarks

Mail - Alison Cush...

Calendar - Alison C...

(1 unread) - a.javkie...

Loch Lomond & Th...

Corporate Services ...

Extras

Home

CERVIS Main Dashb...



You will hopefully have seen some of the Pride posters that are up at HQ, but for those who are not able to get to the office, then here's a wee photo!

Any questions on any of this, just get in touch with [redacted] or another member of the Park for All group who will be happy to help.

Thanks

[redacted]



LGBT Charter staff briefing

Our commitment to LGBT inclusivity

Welcome!



As an organisation, we have signed up to the LGBT Charter, ran by LGBT Youth Scotland.

This is part of our commitment to increase equity, diversity and inclusion across the National Park and Park Authority, coordinated by the Park for All group.

This slide deck explains how the Charter works and some of the actions we will be taking. At the end, we have gathered some useful resources for you to refer to.

Why are we committed to the Charter?



We have statutory obligations under the Equalities Act 2010 to eliminate discrimination in all we do.

Sexual orientation
and
gender reassignment
are two of the nine protected characteristics we must take into account.

Why are we committed to the Charter?



We want everyone: staff, volunteers, visitors and those living and working in the Park, no matter their sexual orientation or gender reassignment, to feel welcome, safe, respected and included here.

What is the LGBT Charter?

The LGBT Charter is a programme that enables our organisation to proactively improve LGBTQ+ inclusion for **staff and service users**, through meeting objectives and standards set out by LGBT Youth Scotland. Our goal in undertaking this programme is to ensure all LGBTQ+ staff and service users feel safe, supported and included.

We are working towards the Bronze accreditation through the Charter programme which we hope to achieve in May 2025.

This journey towards achieving this accreditation signifies to staff, service users and stakeholders that the National Park is a safe space for all.



lgbtyouth.org.uk



@lgbtys

What have we done so far?

The Park For All group have come together as our Charter Champions to lead the work.



58 staff members have completed a 2.5hr online LGBT awareness training course – well done!

We're now finalizing our action plan for the remainder of the year.

Our action plan



Leadership – we have begun reaching out to more LGBT youth groups to better understand their needs for visiting the National Park and will be offering them a Ranger supported day out

Training – 25% of staff to complete the online training –
COMPLETE!

Policy – we'll be reviewing some of our HR policies to ensure they're fully inclusive of LGBT folk

Visibility – we'll be increasing our communications to celebrate LGBT communities and activities

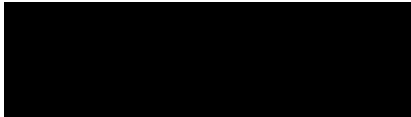
And more!



Questions or suggestions?



Get in touch with us on

 [@lochlomond-trossachs.org](mailto:[redacted]@lochlomond-trossachs.org)



Useful resources

DIGNITY AT WORK POLICY & PROCEDURE

Version: V0_4

Owner: HR/Corporate Services

1.	Introduction	1
2.	Purpose and Scope	1
3.	What do we mean?	2
4.	What can I do to help stop bullying and harassment?	4
5.	What should I do if I think I am being bullied or harassed?	6
6.	What happens if I am accused of bullying or harassment?	7
7.	Wellbeing and Mental Health	8
8.	Equality and Diversity Impact assessment	8
9.	Monitoring and Review	8
10.	Document Controls	8
	Appendix A – Notification of Dignity At Work Complaint	10

1. Introduction

- 1.1. We are committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.
- 1.2. Harassment and bullying can have very serious consequences for individuals and the organisation. Harassment or bullying may make people unhappy, may cause them stress and affect their health and family and social relationships, may affect their work performance and could cause them to leave their job. Severe cases of harassment and bullying can even lead to mental illness and suicide. Effects on the organisation can include loss of morale, poor work performance, increased turnover of staff, legal claims and damage our reputation.
- 1.3. We will not tolerate bullying and harassment of any kind. All allegations of bullying and harassment will be investigated and, if appropriate, disciplinary action will be taken.
- 1.4. We will also not tolerate victimisation of a person for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint. Victimisation is a disciplinary offence.

2. Purpose and Scope

- 2.1. This policy applies to all employees, volunteers, contractors and anyone engaged to work on our behalf. All references to “you” refer to the aforementioned and reference of “we or us” refer to the National Park Authority.
- 2.2. If the complainant or alleged harasser is not employed by the organisation, e.g. if the worker's contract is with an agency, this policy will apply with any necessary modifications such as we could not dismiss the worker but would instead require the agency to remove the worker, if appropriate, after investigation and disciplinary proceedings.
- 2.3. The policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, e.g. business trips and work-related social events.
- 2.4. This policy does not form part of any employee’s contract of employment and we may amend, update or supplement it from time to time.

3. What do we mean?

3.1. Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Harassment can occur where someone perceives another person to have a protected characteristic, for example a perception that someone is transgender even if they are not.

Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic, for example having a family member of a particular religion.

Examples of harassment

Harassment can occur in many forms, and can take place either at work, outside work, in person, or online. While this is not an exhaustive list, examples include:

- "banter", jokes, taunts or insults that are sexist, racist, ageist, transphobic, homophobic or derogatory against any other protected characteristic;
- unwanted physical behaviour, for example, pushing or grabbing;
- excluding someone from a conversation or a social event or marginalising them from the group;
- derogatory comments about pregnancy, maternity leave or IVF treatment;
- mimicking or making fun of someone's disability;
- derogatory or offensive comments about religion;
- unwelcome comments about someone's appearance or the way they dress that is related to a protected characteristic;
- "outing" (i.e. revealing their sexual orientation against their wishes), or threatening to "out", someone;

- consistently using the wrong names and pronouns following the transition of a person's gender identity;
- displaying images that are racially offensive; and
- excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.

3.2. **Sexual Harassment**

Harassment may be sexual in nature. The law defines sexual harassment as:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Employers are legally obliged to take reasonable steps to prevent sexual harassment of their workers in the course of their employment and by third parties.

Examples of sexual harassment

Sexual harassment can occur in many forms, and can take place either at work, outside work, in person, or online. While this is not an exhaustive list, examples include:

- physical conduct of a sexual nature, unwelcome physical contact or intimidation;
- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;
- showing or sending offensive or pornographic material by any means (e.g. by text, video clip, email or by posting on the internet or social media);
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;
- offensive comments about appearance or dress, innuendo or lewd comments;
- leering, whistling or making sexually suggestive gestures; and
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

3.3. **Bullying**

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see Harassment).

Examples of bullying

While this is not an exhaustive list, bullying may include:

- physical, verbal or psychological threats;
- excessive levels of supervision; and
- inappropriate and derogatory remarks about a person's performance.

It is important to understand that legitimate, reasonable and constructive criticism of a person's performance or behaviour, or reasonable instructions given to people in the course of their employment, will not of themselves amount to bullying.

There may also be circumstances in which you are subjected to unwanted conduct from a third party, such as a client or customer. If you feel that you have been bullied or harassed by customers, suppliers, vendors or visitors, you should report any such behaviour to your manager who will take appropriate action. Bullying or harassment of customers, suppliers, vendors or visitors or others will be dealt with through the disciplinary procedure.

A single incident can be harassment if it is sufficiently serious.

All bullying and harassment is misconduct and is a disciplinary offence that will be dealt with under the Disciplinary policy and procedure. Proven bullying or harassment will often be gross misconduct, which can lead to dismissal without notice.

3.4. Victimisation

Victimisation is subjecting a person to a detriment because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because they have made a complaint or giving them a heavier or more difficult workload.

Provided that you act in good faith, i.e. you genuinely believe that what you are saying is true, you have a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment and the organisation will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have victimised you.

Making a complaint that you know to be untrue, or giving evidence that you know to be untrue, may lead to disciplinary action being taken against you.

4. What can we do to prevent bullying and harassment?

4.1. We are committed to taking proactive measures to prevent all forms of bullying and harassment, including sexual harassment, of our staff by:

- ensuring all new staff undergo the online equality, diversity and inclusion training; and sexual harassment training, as part of their induction programme; This is typically the on-line training via the ELMS e-learning portal;
- requiring all staff to attend equality, diversity and inclusion training and sexual harassment training on at least an annual basis. This is typically the on-line training via the ELMS e-learning portal.

- providing additional training for line managers to ensure that they understand how to implement this policy effectively and their role in preventing and stopping bullying and harassment from occurring in the workplace (and by third parties that we may have contact with);
- encouraging individuals to support our equality, diversity and inclusion, and anti-harassment initiatives by attending events and workshops as appropriate to educate themselves on the challenges faced by others and how to help alleviate these in the workplace;
- monitoring our workplace culture through anonymous surveys, exit interviews, one-to-one conversations, and return-to-work meetings to identify and address any issues;
- undertaking regular risk assessments to determine reasonable measures that can be implemented to minimise the risk of exposure to sexual harassment in the workplace, and by third parties that you may have contact with; and
- ensuring that our zero tolerance approach to all forms of discrimination, and bullying and harassment, is communicated to all workers and third parties that you may have contact with.

4.2. Managers have a particular responsibility to:

- set a good example by their own behaviour;
- ensure that there is a supportive working environment;
- make sure that staff know what standards of behaviour are expected of them;
- intervene to stop bullying or harassment; and
- report promptly to human resources any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them.

4.3. We all have a responsibility to help create and maintain a work environment free of bullying and harassment. You can help to do this by:

- being aware of how your own behaviour may affect others and changing it, if necessary - you can still cause offence even if you are "only joking";
- treating your colleagues with dignity and respect;
- taking a stand if you think inappropriate jokes or comments are being made;
- making it clear to others when you find their behaviour unacceptable, unless it should be obvious in advance that this would be the case;
- intervening, if possible, to stop harassment or bullying and giving support to recipients;
- making it clear that you find harassment and bullying unacceptable;
- reporting harassment or bullying to your manager or HR and supporting any investigation of complaints; and
- if a complaint of harassment or bullying is made, not prejudging or victimising the complainant or alleged harasser.

5. What should I do if I think I am being bullied or harassed?

- 5.1. You may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting you. An informal discussion may help them to understand the effects of their behaviour is having on you and agree to change it. You may feel able to approach the person yourself, or with the help of someone in HR, a manager, trade union representative or a colleague.
- 5.2. Alternatively, an initial approach could be made on your behalf by one of these people. You should tell the person what behaviour you find offensive and unwelcome and say that you would like it to stop immediately. You may want to add that, if the behaviour continues, you intend to make a formal complaint. You should keep a note of the date and what was said and done. This will be useful evidence if the unacceptable behaviour continues and you wish to make a formal complaint.
- 5.3. If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint by using the organisation's grievance procedure. In the case of grievances about bullying or harassment, the normal grievance procedure is modified so that you can choose whether to raise your grievance with your manager or directly with the human resources department. We will ensure, where possible, that you can bring your complaint in the first instance to someone of your own sex, if you so choose.
- 5.4. In very serious cases, a criminal offence may have been committed and you may wish to report matters to the police. HR can arrange for someone to accompany you to make a complaint to the police.
- 5.5. All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser. You will have the right to be accompanied by a fellow worker or trade union official at any meeting dealing with your grievance in accordance with the grievance policy. You will be kept informed of the general progress of the process of investigation and, subject to data protection requirements, the outcome of any disciplinary proceedings. We will decide on a balance of probabilities, after considering all available evidence, whether or not harassment or bullying has occurred.
- 5.6. We will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure on a "need to know" basis. For example, your identity and the nature of the allegations must be revealed to the person you are complaining about, so they are able to respond to the allegations. Some details may also have to be given to potential witnesses but this will be limited as far as possible, while ensuring a fair and sufficiently thorough investigation.
- 5.7. The importance of confidentiality will be emphasised to witnesses. If the complaint is upheld, and a person who has been found to have harassed you is kept in our employment, managers may need to be given some information where this is necessary for them to manage the risk of further harassment by that person against you or others.
- 5.8. Wherever possible, we will try to ensure that you and the alleged harasser are not required to work together while the complaint is under investigation. This could involve giving you the option of working from home, where possible, or remaining at home on special leave, if agreed. In the case of serious allegations, the alleged harasser may be suspended while investigation and any disciplinary proceedings are underway.
- 5.9. If your complaint is upheld, and the person found to have bullied or harassed you remains in employment, every effort will be made to ensure that, if possible, you do not have to continue to work alongside the harasser, if you do not wish to do so. We will discuss the

options with you.

- 5.10. If your complaint is not upheld, HR will support you, the alleged harasser and your manager(s) in making arrangements for you both to continue or resume working and to help repair working relationships. The organisation will consider making arrangements to avoid you and the alleged harasser having to continue to work alongside each other if reasonably practical.
- 5.11. You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you.
- 5.12. Some types of bullying or harassment may constitute unlawful discrimination and may give rise to the possibility of other civil claims or criminal proceedings. There are strict time limits for bringing claims of unlawful discrimination to an employment tribunal.

6. What happens if I am accused of bullying or harassment?

- 6.1 If someone approaches you informally about your behaviour, do not dismiss the complaint out of hand because you were only joking or think the complainant is being too sensitive. Remember that different people find different things acceptable and everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. You may have offended someone without intending to. If that is the case, the person concerned may be content with an explanation and an apology from you and an assurance that you will be careful in future not to behave in a way that you now know may cause offence. Provided that you do not repeat the behaviour that has caused offence that may well be the end of the matter.
- 6.2. If a formal complaint is made about your behaviour, this will be fully investigated and the organisation may bring disciplinary proceedings, if appropriate. We will follow the disciplinary procedure and you will have the rights set out in that procedure. You will have the right to be informed of the allegations against you and to put your side of the story and to be accompanied to meetings by a trade union official or fellow worker.
- 6.3. The procedure will be implemented at the appropriate stage for the seriousness of the allegation. Complaints of bullying and harassment will often be allegations of gross misconduct that, if proved, could lead to dismissal without notice.
- 6.4. We will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations and future management of risk, if complaints are upheld, will normally require limited disclosure on a "need to know" basis. For example, some details may have to be given to potential witnesses but this will be limited as far as possible, while ensuring a fair and sufficiently thorough investigation. The importance of confidentiality will be emphasised to witnesses.
- 6.5. Wherever possible, we will try to ensure that you and the complainant are not required to work together while the complaint is under investigation. If the allegation is of gross misconduct, you may be suspended on full pay during the investigation and, if a disciplinary hearing is to be called, until disciplinary proceedings have been concluded.
- 6.6. If the complaint against you is upheld, on a balance of probabilities, a disciplinary penalty may be imposed up to and including dismissal, having regard to the seriousness of the offence and all relevant circumstances. If the complaint is upheld, but you are not dismissed, we could decide to transfer you to another post.
- 6.7. If a complaint is made against you that is not upheld and the organisation has good grounds for believing that the complaint was not made in good faith, the organisation will

investigate and, if appropriate, will take disciplinary action against the person making the false complaint.

- 6.8. You must not victimise a person who has made a complaint in good faith against you or anyone who has supported them in making the complaint or given evidence in relation to such a complaint. Disciplinary action will be taken against you if we have good reason to think that you may have victimised the complainant or someone else.
- 6.9. If the complaint against you is not upheld, HR will support you, the complainant and your manager(s) in making arrangements for you both to continue or resume working and to help repair working relationships.
- 6.10. Some types of bullying or harassment may constitute unlawful discrimination and allegations may give rise to the possibility of other civil claims or criminal proceedings against you, which would proceed independently of the organisation's disciplinary proceedings. You could be personally liable to pay compensation to the complainant if a successful claim in the employment tribunal or other courts was brought against you. Criminal proceedings could lead to conviction and criminal penalties.

7. Wellbeing and Mental Health

- 7.1 This can be a stressful process for all involved therefore it is important to consider the wellbeing and mental health by offering support such as:
- Regular communication
 - Arrange meetings to be a private and in a comfortable location
 - Seek expert support from the employee assistance programme, 0800 5875 670

8. Equality and Diversity Impact assessment

- 8.1. An equality and diversity impact assessment was carried out and no discriminatory effects were identified for any particular group within the workforce. This will be monitored on an ongoing basis.

9. Policy Review

- 9.1. This policy will be reviewed on a regular basis by HR to make sure that its aims are being achieved.

10. Document Controls

Prepared by	
Date effective from	30 October 2017
Review frequency	5 Years
Contact	HR

Revision history

Version	V2_0
Date	October 2017
Summary of changes	Complete update of the policy
Name	██████████

Version	V3_0
Date	October 2020
Summary of changes	Complete update of the policy
Name	██████████

Version	V4_0
Date	February 2025
Summary of changes	Update policy to reflect changes in sexual harassment legislation, format review
Name	██████████

Distribution

This document has been distributed to:

Name	Park Central/Email to Managers
Title/Division	
Date of Issue	November 2017
Version	V0_2

Name	Park Central/Email to all staff
Title/Division	
Date of Issue	December 2020
Version	V0_3

Name	Email to OM
Title/Division	
Date of Issue	March 2025
Version	V0_4

Appendix A – Notification of Dignity At Work Complaint

Name:
Preferred contact details:
Name and contact details for Trade Union or other representative (work colleague):

NB. You are advised to contact your Trade Union Representative before submitting this form

In your own words, please state the grounds of your dignity at work complaint, and any action you have taken so far.

Equality, Diversity and Inclusion Policy

Version: V_03

Owner: HR/Corporate Services

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1. Introduction

The Park Authority (we) is committed to promoting equality, diversity and inclusion by which we mean:-

Equality providing equal opportunities and fairness for all staff and job applicants, and eliminating unlawful discrimination;

Diversity; recognising, respecting and valuing the differences in our people's protected characteristics, backgrounds, skills and experience and encouraging gender diversity, age diversity, ethnic diversity, diverse physical ability and neurodiversity in our workforce;

Inclusion; ensuring a workplace culture that is fair and safe for all staff, that values our differences and enables each person to be themselves, achieve their potential and thrive at work.

2. Purpose and Scope

- 2.1. To put this commitment into practice and to ensure that no member of staff, service user, job applicant, agency worker, volunteer or board member is unlawfully discriminated against because of any 'protected characteristic', namely age, disability, sex, gender reassignment, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership.
- 2.2. Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. We have a separate Dignity at Work policy, which deals with these issues.
- 2.3. The core principles set out in this policy apply both in the workplace and outside the workplace in a work-related context, such as on business trips, customer or supplier events or work-related social events.
- 2.4. This policy does not form part of any employee's contract of employment and we may amend, update or supplement it from time to time.

Commented [EW1]: Need to be consistent when referencing these in policies

3. Core Principles

- 3.1. Through the implementation of this policy The National Park Authority will focus on the eradication of discrimination, whether direct or indirect, in its own structures, employment practices and the provision of services. Equality of opportunity is a key policy objective and an integral element of our organisational culture.
- 3.2. In order to ensure that the equal opportunities goals are being met, the impact and implementation of this policy will be monitored.
- 3.3. Everyone who works with the Park Authority is required to assist the Park Authority to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination. All staff are responsible for ensuring that there is no discrimination in the workplace and for ensuring that this policy is applied on a day-to-day basis. We expect all staff to apply the principles of equal opportunities and non-discrimination in their interactions with customers, suppliers, business partners and visitors. We expect staff to take personal responsibility for following, promoting and upholding this policy. Individuals, including members of staff and board members can be held personally liable for acts of unlawful discrimination and could be found guilty of a criminal offence.

4. Implementation and training

- 4.1. This policy will be included in Park Authority induction materials and is available on the intranet.

- 4.2. The National Park Authority will also provide regular and ongoing staff training on equalities. This includes yearly on-line training via the ELMS portal as well as more detailed training for managers on how to manage equality, diversity and inclusion in the workplace, as required. Other staff may also be required to attend equality, diversity and inclusion training as required. Attendance at training will be compulsory if you are notified that you should attend a course.

5. The law

- 5.1. As an integral part of our organisational culture, we wish equality of opportunity to be a mainstay of our policies and behaviour, the legal requirement establishes only a baseline for our policy position. The relevant legal provisions are covered in the following sections of this policy document.
- 5.2. It is unlawful to discriminate against an individual because of a protected characteristic during recruitment, employment or, in some circumstances, after employment has ended.
- 5.3. It is unlawful for an employer to fail to make reasonable adjustments to its requirements, working practices or the physical features of the workplace where these put a disabled job applicant or employee at a substantial disadvantage. It is also unlawful discrimination where a disabled employee is at a substantial disadvantage due to the employer's unreasonable failure to provide an auxiliary aid or service to the disabled employee

6. Types of Unlawful Discrimination

6.1. Direct Discrimination

This is where a person is treated less favourably (or, in the case of pregnancy and maternity, unfavourably) than another because of a protected characteristic. For example, rejecting an applicant because of their race because they would not "fit in" would be direct discrimination. In limited circumstances the Park Authority can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means to achieve a legitimate aim.

6.2. Indirect Discrimination

This is treating a group of people in the same way, but in a way which adversely affects those with a protected characteristic. For example, a requirement to work full time – although applied to everyone, will adversely affect those members of staff with childcare responsibilities, and these tend to be women. Such a requirement would be unlawful unless it can be objectively justified.

6.3. Harassment

For the purposes of this policy, harassment is where there is unwanted conduct, related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity which are covered by direct discrimination provisions in

the Equality Act 2010) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct. The principle of harassment being unacceptable more generally within the Park Authority also applies to all interactions between staff, board members, volunteers and contractors outwith any specific reference to protected characteristics. Please refer to the Dignity at Work Policy for more information on harassment.

6.4. Perceptive Discrimination

This is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic. For example, choosing not to promote someone because you mistakenly perceive them to be gay. This category does not apply to the protected characteristics of marriage and civil partnership or pregnancy and maternity.

6.5. Associative Discrimination

This is where an individual is directly discriminated against or harassed because of their association with another individual who has a protected characteristic, for example because their partner is transgender. This category does not apply to the protected characteristics of marriage and civil partnership or pregnancy and maternity.

6.6. Third-party Harassment

This occurs where a member of staff is subject to harassment related to a protected characteristic by third parties such as clients, customers or visitors. For example, if a waiter of Asian origin has complained on several occasions to their employer that a particular customer has been making racist remarks to them, the employer should take steps to protect the member of staff from such third-party harassment, such as banning the customer from the restaurant.

6.7. Victimisation

This occurs when a member of staff is subjected to a detriment, such as being denied a training opportunity or a promotion, because they have alleged discrimination or asserted their right not to be discriminated against because of a protected characteristic. For example, if a blind member of staff raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from meetings, such behaviour could amount to victimisation. It should be noted that a member of staff is not protected from victimisation if they acted maliciously or made or supported an untrue complaint in bad faith.

6.8. Discrimination arising from disability

This is unfavourable treatment of a disabled person because of something arising in consequence of their disability. Such treatment is unlawful unless it can be objectively justified.

6.9. Failure to make Reasonable Adjustments

This is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who is not disabled and the employer has failed to take such steps as is reasonable to avoid the disadvantage. In addition, where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled, and the employer has failed to take such steps as is reasonable to provide the auxiliary aid.

7. Recruitment and Selection

- 7.1. We positively welcome applications for employment from all sections of the community. We are committed to promoting greater equality by employing people from underrepresented groups at all levels of the workforce. All those involved in staff selection will receive appropriate equal opportunity guidance/training. This will ensure that the principle of equality applies to all selection and promotion practice.
- 7.2. Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job. We will take account of any requested reasonable adjustments. Factors such as a disability, other protected characteristic, personal or home commitments will not form the basis of employment decisions except where necessary. We will appoint, train, develop, reward and promote staff based on merit and ability.
- 7.3. We cannot directly discriminate in the selection of staff for recruitment or promotion, but we may use appropriate lawful methods, including lawful positive action to address under-representation of any group that we identify as being underrepresented in particular types of jobs.

8. Terms of Employment

- 8.1. We will seek to avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for learning and development, pay and benefits, discipline and selection for redundancy.
- 8.2. We will review regularly the terms of employment, benefits, facilities and services available to staff to ensure that they are provided in a way which is free from unlawful discrimination. We will ensure that part-time workers receive pay, benefits, facilities and services on a pro-rata basis to their full-time comparator unless otherwise objectively justified.
- 8.3. We will consider any possible indirectly discriminatory effect of standard working practices, including the number of hours to be worked, the times at which these

are to be worked and the place at which work is to be done. This includes when considering requests for variations to these standard working practices and such requests will only be refused if we consider it has lawful reasons, unrelated to any protected characteristic, for doing so. We will comply with our obligations in relation to statutory flexible working requests. We will consider any requests for reasonable adjustments to standard working practices to overcome barriers caused by disability.

9. Monitoring

- 9.1. We will regularly monitor the effectiveness of this policy to ensure that it is working in practice. We will monitor the ethnic, gender and age composition of the existing workforce and of applicants for jobs, including promotion, and the number of people with disabilities within these groups, and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process. Monitoring may also include the key areas of pay and benefits, training, performance reviews, disciplinary and grievance matters and dismissals and reasons for resigning.
- 9.2. In order to monitor diversity in these areas, we will process personal data and special category data (formerly known as 'sensitive personal data') in accordance with our data protection policy and data protection privacy notice.
- 9.3. We will comply with our obligations in respect of reporting on and reducing any gender pay gap, ethnicity pay gap and/or disability pay gap.

10. Expression of Belief

- 10.1 An inclusive environment is one where differences are recognised, respected and celebrated. We wish to ensure we all work in an environment where everyone feels welcomed and valued. As a diverse workplace, with a wide range of backgrounds and mindsets, we foster an environment where creativity and innovation can flourish.
- 10.1. We recognise, that in some situations, this may mean that one person's protected characteristic, such as their religious belief, conflicts with another person's belief or other protected characteristic. However, we expect all staff to be respectful of others and their protected characteristics in all their dealings and interactions in the workplace and in situations when their private actions may impact the reputation of the Park Authority if they are made public (e.g. in communications on social media).

11. Disability

- 11.1. Disabled people, including job applicants and members of staff, should be able to participate in all Park Authority 's activities fully, on an equal basis with people who are not disabled.
- 11.2. For the purpose of this policy, a disability is a physical or mental impairment that has a substantial and long-term effect upon a person's ability to carry out normal

day-to-day activities. Cancer, HIV infection and multiple sclerosis are disabilities from the point of diagnosis.

- 11.3. Some disabilities are immediately obvious, for example use of a wheelchair, while other disabilities may not be apparent at all, for example HIV infection. Certain conditions are not considered to be disabilities, for example poor eyesight that is corrected simply by wearing prescription spectacles, or addiction to alcohol or other substances. If you would like further information about whether a particular condition may be a disability you should contact HR.
- 11.4. Due to the wide variety of potential disabilities, and the likelihood of a disability affecting different people in different ways, we do not prescribe rigid rules on how issues concerning disabled people should be dealt with. What is essential is that all board members, managers, and HR take all reasonably practical steps to ensure that disabled people are not less favourably treated or disadvantaged by comparison to people who are not disabled in relation to their work, working environment, or by any provision, criterion or practice used by the Park Authority. Managers need to be mindful that a member of staff on long-term sick leave or with intermittent sickness absence may be disabled.

12. Service Delivery

- 12.1. The policy will be implemented to ensure that all those with whom members of staff come into contact with are treated in a fair and equitable way.
- 12.2. Members of staff should not discriminate against or harass a member of the public in the provision of service or goods.
- 12.3. We have a duty to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments may include the removal, adaption or alteration of physical features if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service. We aim to provide the best value for money for its service users. It welcomes comments, complaints or suggestions about how to improve its services or compliments about its work.
- 12.4. Discriminatory conduct by members of the public who are receiving our services, either towards other members of the public, staff, agency workers, volunteers or board members is unacceptable. Where a member of staff feels comfortable to do so, they are encouraged to identify at the time that they feel the conduct experienced is unacceptable to the people exhibiting the unacceptable behaviour in question. Members of staff should always report any such conduct to their manager who will take appropriate action.

13. Relationships with outside organisations/contractors

- 13.1. We will promote this policy with outside groups, organisations, contractors and suppliers. This will be done to demonstrate its commitment to equality for all by

working towards the eradication of discrimination and the development of real equality.

14. Communication

- 14.1. We will aim to ensure that board members, members of staff, temporary or agency workers, and volunteers are able to communicate effectively at all levels with those working with us and service users. This will include developing systems to communicate effectively with all disadvantaged groups, including physically and sensory impaired people and those whose first language is not English.

15. Consultation

- 15.1. We will consult with all groups regarding staff related issues, and in accordance with our Equality, Diversity and Inclusion Policy ensure that contact is made to take account of the diversity of the community. Contact will be maintained with individuals and groups which represent minority groups as well as other groups within the community to maintain up-to-date information as to their needs and requirements.

16. Breaches of this policy

- 16.1. If a member of staff believes that they may have been discriminated against, they are encouraged to raise the matter through the Grievance Policy and Procedure. If a member of staff believes that they may have been subject to bullying, harassment or victimisation, they are encouraged to raise the matter through the Dignity at Work Policy. If a member of staff is uncertain which applies or needs advice on how to proceed, they should speak to their manager or to HR.
- 16.2. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Members of staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made maliciously and/or in bad faith will, however, be dealt with under the Disciplinary Policy & Procedure.
- 16.3. We will not tolerate behaviour that goes against the terms, spirit and/or aims of this policy. Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour is likely to constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

17. Policy review

- 17.1. This Policy will be reviewed on a regular basis by HR to make sure that its aims are being achieved.

18. Equality and Diversity Impact Assessment

18.1. Details here

19. Document controls

Prepared by	
Date effective from	2012
Review frequency	3 Years
Contact	HR

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Maternity Procedure

Version: v0_4 April 2025

Owner: HR / Corporate Services

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1. Purpose and Scope

- 1.1. The Maternity Procedure sets out the rights and responsibilities of employees who are expecting, considering starting or adding to their family.
- 1.2. In some situations, the employee and their spouse or partner may be eligible to opt into the shared parental leave (SPL) scheme which gives the employee more flexibility to share the leave and pay available in the first year after birth. However, the employee must take a period of compulsory maternity leave first. (See para 9.6). Details of SPL are set out in our Shared Parental Leave Policy.

- 1.3. A pregnant employee's maternity rights and benefits are complex and while Loch Lomond & The Trossachs National Park Authority (LLTNPA) has endeavoured to make this policy as comprehensive as possible, it is not possible to cover every eventuality. Further information, confidential support and guidance on individual circumstances can be sought from Human Resources (HR).
- 1.4. LLTNPA is committed to support all new and expectant mothers throughout their pregnancy and after childbirth.

2. Principles

- 2.1. The eligibility criteria for maternity pay and leave is explained and advice is given on steps the employee needs to take once they become aware of the pregnancy, before they start maternity leave, while they are on maternity leave and the options available to them and the actions they should take before returning to work. Further details of the arrangements for antenatal care, pregnancy related illness and other general issues are provided.
- 2.2. There are two types of maternity benefits; maternity leave and maternity pay, this is further broken down into two categories and is dependent on an individual employee's length of continuous service:
 - Statutory – the minimum level provided by statute.
 - Occupational – provided by LLTNPA.

3. Notification of pregnancy

- 3.1. In order to be eligible to take maternity leave the employee must inform LLTNPA they are pregnant no later than the end of the 15th week before the expected week of childbirth (EWC), unless this is not reasonably practicable, in which case notification must be provided as soon as is reasonably practicable.
- 3.2. Notification should be given in writing by completing and signing the Notification of Intention to take Maternity Leave (Appendix 3) which requires confirmation of the following:
 - the employee is pregnant;
 - the expected week of childbirth (EWC), and;
 - the date which the employee intends to start maternity leave
- 3.3. The EWC must be certified by a doctor or midwife, usually by attaching a MATB1 Form to the notification. HR will then write to the employee within 28 days to inform them of the date LLTNPA will expect the employee to return to work if they take their full entitlement.

4. Leave Entitlements

4.1. Time off for Antenatal Care

- 4.1.1. Time off for antenatal care is classed as an appointment that an expectant mother has been advised to attend by a General Practitioner (GP), midwife, consultant or other qualified health professional. Antenatal care may include relaxation and parent craft classes which are recommended by the employee's health professional.
- 4.1.2. All pregnant employees are entitled to paid time off work (including travelling time) to attend ante-natal appointments, irrespective of length of service or hours of work.
- 4.1.3. Employees should make every effort to ensure that ante-natal appointments are attended outside normal or scheduled working hours. LLTNPA is aware that this is not always possible; therefore, appointments should be made at a time where minimal disruption will occur.
- 4.1.4. An employee who has a qualifying relationship with a pregnant woman, which includes the employee's husband or civil partner and the father of the expected child, is eligible to take paid time off to attend up to two antenatal appointments.
- 4.1.5. Pregnant employees should notify their line manager of any pregnancy related appointments with as much notice as possible. Employees must complete a Special Leave request through snowdrop. Apart from the first appointment the employee must provide an ante-natal appointment card if requested to do so.

4.2. Compulsory Maternity Leave

- 4.2.1. The Employment Rights Act 1996 prohibits employees from returning to work during the two week period following childbirth. Compulsory Maternity Leave is part of Ordinary Maternity Leave (OML).

4.3. Ordinary and Additional Maternity Leave

- 4.3.1. All pregnant employees are entitled to OML regardless of length of service, for a period of 26 weeks.
- 4.3.2. OML can start at any time after the start of the 11th week before the EWC up until the birth of the child. Therefore, OML can commence anywhere between weeks 29 and 40 of the pregnancy. There are certain exceptions to this (refer to Section 4 - Starting Maternity Leave).
- 4.3.3. Employees are entitled to take up to 26 weeks Additional Maternity Leave (AML) immediately following OML. AML begins on the day after OML ends, giving a total of 52 weeks leave.

4.4. Starting Maternity Leave

- 4.4.1. The earliest date and employee can start maternity leave is 11 weeks before the EWC. However, maternity leave can start on whichever date is the earlier of:
- 4.4.2. the employees chosen start date (notified in accordance with this policy), or;
- 4.4.3. the day after any day on which the employee is absent for a pregnancy related reason during the four weeks before the EWC, or;
- 4.4.4. the day after the employee gives birth.
- 4.4.5. The employee can bring forward or postpone their maternity leave start date, providing that this is advised in writing at least 28 days before the new start date or if this is not possible as soon as is reasonably practicable. LLTNPA will respond in writing to the employee's notification of their leave plans within 28 days confirming the date on which they expect to return to work following the completion of their maternity leave.
- 4.4.6. If the employee is absent for a pregnancy-related reason during the four weeks before the EWC, the employee must let their line manager know as soon as possible in writing. Maternity leave will be triggered under Section 13, if applicable, and if both parties agree to delay it.

5. Pay Entitlements

There are 2 types of maternity benefit paid by the Government based on National Insurance contributions. These are Statutory Maternity Pay (SMP) and Maternity Allowance (MA).

5.1. Statutory Maternity Pay

- 5.1.1. Entitlement to SMP depends on an employee's length of service. SMP is payable for up to 39 weeks during maternity leave.
- 5.1.2. SMP is not ordinarily payable until the 11th week before the EWC. If childbirth occurs before the EWC, then maternity pay will commence on the day following childbirth.

5.2. Eligibility for Statutory Maternity Pay

To be eligible for SMP an employee must:-

- 5.2.1. have continuous service of at least 26 weeks by the end of their Qualifying Week (15th week before the EWC) and this period must include at least one day's employment in the qualifying week.
- 5.2.2. provide a doctor or midwife certificate (MATB1 Form) stating the EWC.

- 5.2.3. have given at least 28 days notice, or if that is not possible as much notice as they can, of their intention to take maternity leave.
- 5.2.4. still be pregnant at the 11th week before EWC or have given birth by that time.
- 5.2.5. have physically stopped work
- 5.3. HR will confirm an employee's eligibility to SMP on receipt on the Notification of Pregnancy Form.
- 5.4. If the employee returns for all or part of any week before the SMP is finished, their SMP is reduced by a week for each week or part week in which they worked. This excludes KIT days.

5.5. Amount of Entitlement

- 5.5.1. Pregnant employees who qualify for SMP can choose when to start getting SMP. The earliest date is in the 11th week before the EWC. SMP is paid for a maximum of 39 weeks at the following rates:
 - 12 weeks full pay
 - 27 weeks half pay
- 5.5.2. The above is inclusive of SMP
- 5.5.3. SMP payments are made in the next payroll date and income tax, National Insurance and pension contributions are deducted as appropriate.
- 5.5.4. Employees must return for a period of 3 months after Maternity Leave, otherwise the non-statutory element of maternity pay must be repaid. However, if the employee is unsure whether they will return to work after the period of Maternity Leave they can defer payment until they return to work, when it can be paid as a lump sum.

5.6. Maternity Allowance

- 5.6.1. If a pregnant employee's length of service does not meet the requirements for SMP, i.e. they have less than 26 weeks service by the 15th week before the EWC (week 25 of pregnancy) they may be eligible for MA or income support. The employee must claim MA directly from their local Job Centre Plus.

6. Employees Serving Probationary Periods

- 6.1. When an employee becomes pregnant whilst serving their probationary period, or when an employee is already pregnant when commencing probation, the probationary period may need to be extended. The extension would only be required to accommodate for any possible absences or temporary duty restrictions

that may have an impact upon the employee's ability to complete the competencies required for their particular role.

- 6.2. In certain cases where the employee's maternity leave period coincides with their probationary period, their probation may be suspended until the employee has returned to full duties. For further guidance on this section please ask the HR Section.

7. Childbirth

7.1. Premature Birth

- 7.1.1. In the case of a premature birth, if maternity pay has already begun, then there is no change to the entitlements or start dates.
- 7.1.2. If childbirth occurs before the Expected Date of Childbirth (EDC) and maternity pay has not already commenced then maternity leave and pay will commence on the day after childbirth, provided that the employee meets all the requirements for the entitlements. This will apply even when the baby is prematurely born before the 15th week before their EWC. If the employee gives birth before their maternity leave was due to start, the employee must let their line manager and HR know the date of the birth in writing as soon as possible.

7.2. Multiple Births

- 7.2.1. In the case of multiple births there is only one entitlement to one period of maternity leave and pay.

7.3. Miscarriage & Stillbirth

- 7.3.1. If an employee suffers a stillbirth after 24 weeks of pregnancy, it is deemed as childbirth; therefore, they will have the right to maternity leave and pay in accordance with their length of service.
- 7.3.2. An employee who miscarries before the start of the 25th week of pregnancy will not be entitled to leave or pay. They will however be entitled to sick pay and/or compassionate/special leave. This will be granted on the basis of individual circumstances taking into consideration the needs and welfare of the employee and medical opinion.
- 7.3.3. If the baby is born alive but later dies, the employee retains their entitlement to maternity leave and pay under the normal conditions. LLTNPA will offer support to employees in these circumstances. Counselling will be available through LLTNPA's counselling provider.

8. Keeping in touch (Kit) days

- 8.1. Line managers are expected to keep in reasonable contact with the employee from time to time during their period of maternity leave. This may be to discuss the employee's plans for return to work, to discuss any training to be given to assist with

the return to work or simply to update the employee on developments at work during maternity leave.

- 8.2. As well as staying in contact with their line manager via email, post or telephone, employees also have the option to return to LLTNPA to complete up to 10 days work known as “Keeping in Touch Days” during either ordinary or additional maternity leave without bringing their maternity leave period to an end and without the loss of a week’s statutory maternity pay (SMP) as a result of carrying out that work. This provision applies to the entire period of ordinary and additional maternity leave, except during the two week compulsory maternity leave immediately preceding the birth of the child.
- 8.3. Employees are not obliged to undertake any such work during maternity leave and are not permitted to carry out KIT days during the compulsory maternity leave period. Any work done on KIT days does not extend the period of maternity leave.
- 8.4. The employee and their line manager should agree the work that the employee will complete before they undertake a KIT day. The employee will be able to complete any work that would usually fall under the remit of their position, but may also use KIT days to attend training, conferences etc.
- 8.5. Any period of working in one day, during maternity leave, will count as one whole KIT day. When SMP is being paid:
 - the daily rate is calculated based on the employee’s annual salary;
 - when the employee is in receipt of maternity pay the daily rate will be offset against maternity pay (the employee will not receive payment less than that of SMP);
 - if the daily rate is more than the weeks SMP rate then the difference between the two will be paid;
 - if the daily rate is less than the weeks SMP rate the SMP rate will be paid;
 - KIT days can be taken either as individual days or in blocks of two or more;
 - when SMP is no longer being paid the daily rate will be paid

9. Expected Return to Work Date

- 9.1. An employee is required to provide notification in writing to their line manager of their intended return to work date, providing at least 28 days’ notice (Appendix 4). The employee will be sent a letter, within 28 days of receipt of the Notification of Return from Maternity Leave Form, informing them of their expected return date. Unless otherwise indicated, LLTNPA will assume that the employee wishes to take the maximum period of OML and AML.
- 9.2. If the employee wishes to return to work earlier than the expected return date they must put this request in writing to their line manager at least eight weeks before their intended return to work date.
- 9.3. If sufficient notice is not given, LLTNPA may postpone the employees return date until eight weeks after the employee gave notice, or to the expected return date whichever is sooner. The employee’s return to work cannot be postponed to a date later than the end of the AML period.

9.4. If the employee wishes to return later than the Expected Return Date, the employee should either:

- 9.4.1. request unpaid parental leave [in accordance with our Parental Leave Policy], giving us as much notice as possible but not less than [21 days];
or
- 9.4.2. request paid annual leave in accordance with your contract, which will be at our discretion.

9.5. If the employee is unable to return to work due to sickness or injury, this will be treated as sickness absence and our Sickness Absence Policy will apply.

9.6. Returning to Work

- 9.6.1. An employee returning to work from OML is entitled to return to the same position on the same terms and conditions, such as salary, hours and seniority of the position, as though they had not been absent.
- 9.6.2. An employee returning from AML will ordinarily return to work in the same position they held before commencing leave, or if this is not reasonably practicable, to another suitable and appropriate job on terms and conditions that are not less favourable.
- 9.6.3. In the event of re-organisation of the team in which the employee works, they will be treated according to their terms and conditions and will be included in all consultations as though they were not on maternity leave. LLTNPA endeavours to offer any suitable alternative vacancy which is available, under terms and conditions that are not substantially less beneficial than those under which the employee was previously employed.
- 9.6.4. Within the first week of the employee's return to work a meeting between the manager and the employee will take place. This meeting is to facilitate the employee's re-integration into LLTNPA as well as a Health and Safety risk assessment (if appropriate) of the employee's work environment. Please seek advice from HR on individual circumstances.

9.7. Part time, Job Share, Flexible Working

- 9.7.1. An employee wishing to return to work under different terms and conditions can make a written request, as soon as possible in advance of their return date, under the terms and conditions of the "Flexible Working Policy". All requests will be considered in line with operational requirements of the business.

9.8. Resignation

- 9.8.1. An employee, who chooses to resign prior to the commencement of maternity leave, may still be entitled (subject to eligibility) to elements of

SMP, OML and AML. Please seek advice from HR on individual circumstances.

- 9.8.2. An employee on maternity leave who is thinking about resigning should contact HR to ensure that have considered all the options available to them.
- 9.8.3. An employee who decides to resign while on maternity leave must forward their resignation to their line manager as soon as practicably possible, ensuring that they comply with the notice period required as set out in their contract of employment. If the notice period would expire after maternity leave has ended, LLTNPA may require the employee to return to work for the remainder of the notice period.

9.9. Overlapping Periods of Maternity Leave

- 9.9.1. Occasionally, two periods of maternity leave overlap or fall close together. If this occurs and the employee wishes to start the second maternity leave period before the first maternity leave period has finished or within one month of the first period being completed, their line manager and HR may allow them to do so on certain provisions:
 - The employee provides notice of their pregnancy and intention to take a second period of maternity leave as defined in Section 2 – Notification Process.
 - The employee will be required to return to work for more than three months following the second maternity period.
 - LLTNPA may choose to waiver the requirement to return to work for at least three months following the first maternity leave period

9.10. Switching to Shared Parental Leave

- 9.10.1. In some cases, the employee and their spouse or partner may be eligible to opt into the SPL scheme which gives the employee more flexibility to share the leave and pay available in the first year after birth. The employee's partner should check with their employer if they are eligible.
- 9.10.2. The employee would need to give their line manager at least eight weeks' written notice to end their maternity leave and opt into SPL. The employee can give this notice before or after the birth, but they must remain on maternity leave until at least two weeks after the birth. The employee would then be able to share any remaining leave with their partner. For further information about how SPL works, see our Shared Parental Leave (Birth) Policy.

9.11. Terms and conditions during OML and AML

- 9.11.1. All the terms and conditions of your employment remain in force during ordinary maternity leave and additional maternity leave, except for the terms relating to pay. In particular:

- benefits in kind [such as life insurance, health insurance, gym membership and use of a company vehicle if applicable] shall continue;
- annual leave entitlement under your contract shall continue to accrue (see para 11)
- pension benefits shall continue (see para ?)

9.12. Redundancies during maternity leave

9.12.1. If the employee's post is affected by a redundancy situation occurring during her leave, HR shall write to inform the employee of any proposals and shall invite the employee to a meeting before any final decision is reached. Employees on maternity, adoption or shared parental leave shall be given first refusal on any suitable alternative vacancies that are appropriate to their skills

10. Breastfeeding at Work

10.1 LLTNPA supports new mothers who return to work by endeavouring to provide facilities for breastfeeding or expressing milk and allowing the employee to manage their own breaks with consent from their manager.

10.2 Suitable breastfeeding facilities should comprise of:

- a comfortable and relaxed environment.
- a private place, where the employee will not be disturbed.
- a place for the employee to sit or lay down.
- be conveniently situated in relation to sanitary facilities.
- a fridge and washing facilities to sterilize any equipment. The fridge need
- not be a separate fridge; however, it should not contain any goods or
- products that may contaminate the breast milk.
- an electric point.

10.3 Managers are responsible for ensuring that the employee's needs in regard to breastfeeding or expressing milk are met. This entails consulting the employee on what their requirements may be.

10.4 Prior to a breastfeeding employee returning to work, the manager is required to assess the accessibility of breastfeeding facilities in the workplace for the employee. Upon the employee's return to work and periodically thereafter a risk assessment will be undertaken by the line manager of the new mother's work environment. Once an assessment and consultation with the employee has been undertaken, LLTNPA will take any reasonable action required to provide suitable breastfeeding facilities for the employee. Adjustments to the workplace, location or alternative work may need to be found to accommodate the employee.

11. Sickness Absence

11.1 Sickness absence in the period prior to the intended start of maternity leave (provided that it is before the last four weeks prior to the EWC) or the period after

the intended date of return to work, due to pregnancy, will be recorded in the normal way and paid in accordance with sick pay as defined in the Absence Reporting & Management policy. Absences such as these will not count towards the unsatisfactory attendance procedure provided that medical evidence is produced to support the assertion that the illness is pregnancy related.

- 11.2 If sickness absence from work within the last four weeks before the EWC is wholly or partly pregnancy related, the employee must notify their manager and HR as soon as reasonably practical. Their maternity leave and pay period will then commence on the first day following the first day of sickness absence. HR will contact the employee confirming the situation and provide them with updated details of their maternity leave and pay.
- 11.3 Sickness absence that is not pregnancy related will be recorded in the normal way and will count towards the unsatisfactory attendance procedure. Sick pay will be paid as usual, provided that the employee meets the requirements of the sick pay scheme. Maternity leave will commence on the date previously notified or the day following childbirth, whichever is earlier.
- 11.4 An employee who is ill during maternity leave is not entitled to sick leave or sick pay until the intended date of return to work.

12. Annual Leave and Public Holidays

- 12.1 The Employee will continue to accrue both statutory and any contractual holiday entitlement (annual leave and public holidays) during both the 26 week OML and 26 week AML period.
- 12.2 Employees are encouraged to take any outstanding annual leave due to them before the commencement of OML. Employees are reminded that holidays should be taken in the year that it is earned and therefore if the holiday year is due to end during maternity leave, the employee should take the full years entitlement before starting her maternity leave. This mechanism provides a means of preventing employees returning from maternity leave with an excessive carryover of holiday entitlement. If this is not reasonably practicable the employee can agree with their line manager to carry the leave over and take it on return from maternity leave.
- 12.3 An employee may take annual leave both prior to and following a period of maternity leave. This is provided that their annual leave entitlement for the calendar year is not exceeded and their line manager authorises it.
- 12.4 The employee should discuss their holiday plans with their line manager in good time before starting their maternity leave. All holiday dates are subject to approval by the employee's line manager.

13. Continuous Service

- 13.1 All absence on maternity leave will count towards continuous service.

14. Pension Contributions

- 14.1 Maternity leave will count as pensionable service provided that the employee continues paying pension contributions.
- 14.2 An employee who is paid maternity pay will pay pension contributions based on the earnings received during their maternity period.
- 14.3 When an employee commences a period of unpaid maternity leave, pension contributions stop being paid by the employee and the organisation. On return to work an employee has the option to pay back contributions for this unpaid period. Further details can be obtained from Payroll/HR.
- 14.4 LLTNPA will continue to pay the employer's portion of the pension contribution for the period of maternity leave.

15. Monitoring and Review

- 15.1. LLTNPA will monitor and review this Policy to reflect organisational needs, experience and statutory obligations as necessary.

Appendix 1

GLOSSARY OF MATERNITY RELATED TERMS

- **Actual Week of Childbirth:** The week in which childbirth occurs.
- **Additional Maternity Leave (AML):** The 26 week period beginning at the end of ordinary maternity leave. This applies to all employees, regardless of length of service.
- **Average Weekly Earnings:** This is the eight week period up to the 15th week before the expected week of confinement (weeks 18 to 25 of pregnancy). Average weekly earnings can include shift allowances, overtime payments, bonuses and commission.
- **Childbirth:** The live birth of a child or a stillbirth after 24 weeks of pregnancy.
- **Compulsory Maternity Leave:** The two week period directly following childbirth during which the new mother may not return to work.
- **Expected Week/Date of Childbirth (EWC/EDC):** The week or date when childbirth is expected to occur as certified by the MATB1 Form.
- **Keeping In Touch Day (KIT):** Up to ten days that an employee can use to work whilst undertaking maternity leave.
- **Maternity Allowance:** An allowance which is claimed from the Benefits Agency by employees who do not qualify for maternity pay. Eligibility is based on National Insurance contributions. Maternity Allowance may be claimed for a maximum of 39 weeks.
- **Maternity Certificate (MATB1):** A medical certificate issued by a doctor or midwife, confirming pregnancy and the expected week of confinement.
- **Maternity Pay Period (MPP):** The 39 week period, which starts no earlier than the 11th week before the expected week of confinement during which statutory maternity pay or maternity allowance are payable.
- **Ordinary Maternity Leave (OML):** The 26 week period beginning no later than the day after the birth of the child. All pregnant employees are entitled to this.
- **Qualifying Week:** The 15th week before the expected week/date of confinement (EWC/EDC).
- **Unpaid Maternity Leave:** The leave period following the 39 weeks paid maternity period. The employee is on additional maternity leave or occupational maternity leave, during which time they are not paid by BTP.
- **Week:** Begins midnight between Saturday and Sunday. However, for the purposes of the maternity pay period, a week is a period of seven days i.e. if maternity pay begins on a Thursday for 39 weeks, it will end on a Wednesday 39 weeks later.

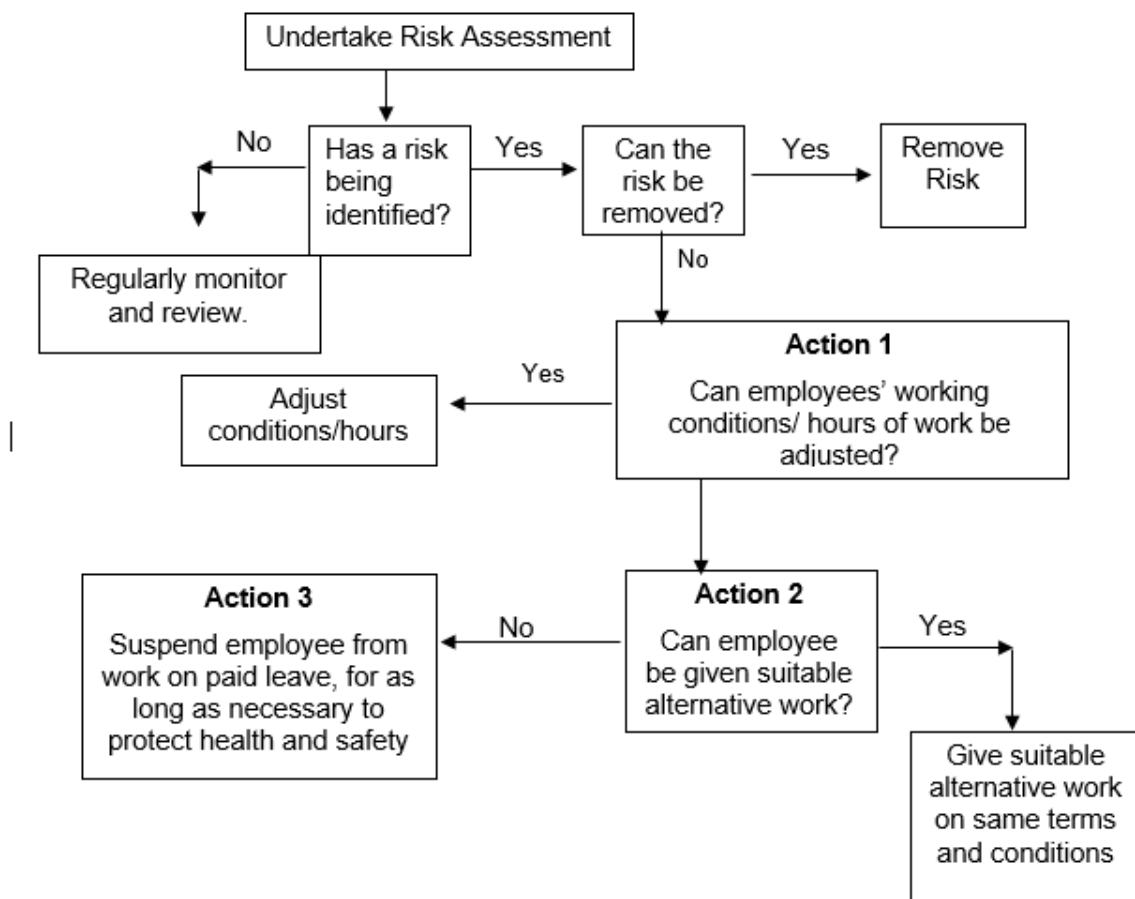
Appendix 2

RISK ASSESSMENT – GUIDANCE FOR MANAGERS

When you are notified that an employee is pregnant, has given birth in the last 6 months or is breastfeeding, a risk assessment must be undertaken to ensure that the employee is not exposed to any significant risk.

The Maternity Risk Assessment Record can be used to assess risk to the employee. It is important that the employee advises you of any advice they have received from the doctor or midwife that can impact on the assessment.

The attached flowchart provides an outline of action Managers must take, all of the undernoted actions should be monitored and reviewed on a regular basis:-



Main Risks to be Avoided

Physical agents

- Shocks/vibration/movements
- Lifting, moving and handling of loads entailing risks
- Noise
- Electric shock
- Compressed air
- Extremes of cold and heat
- Fatigue and Stress

Working conditions

- Display screen equipment
- Ergonomics

Biological agents

- Hepatitis B and HIV

Chemical agents

- Substances labelled R40,R45,R46,R47,R61,R63,64
- Carbon monoxide
- Pesticides

Document controls

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Review frequency	Annually
Contact	HR

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Name	

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Summary of changes	Reviewed to employment law aspects are up to date
Name	

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Date	April 2025
Summary of changes	Minor updates to reflect neutral language
Name	

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Rowardennan Master Plan

The Masterplan EqIA made it clear that work to improve toilets would have potential to impact across multiple equality groups, especially disability, age, sex and gender. And this was developed with internal working group, as well as input from stakeholders and representative access forums.

Old toilet block really didn't meet the modern expectations of accessible and inclusive facilities, and was not compliant with modern regulations, so development here is a real opportunity to have a positive impact.

New toilet block meets regulations AND exceeds them:

- 6 new non-gendered large toilet rooms, over & above enlarged to allow visitors with rucksacks
- 1 new accessible WC with dual access (accessible for those with left and right side mobility)
- 1 new enlarged 24-hours WC for users with mobility difficulties or users with small children

Toilets often come up in our discussions, because they are an obvious feature where decisions can impact multiple groups

Balance is required. For example, having gender neutral toilets seem to satisfy the requirements of multiple groups

However desegregation can have implications for women of certain religions e.g. Islamic, Hindu or Jewish Orthodox can be forbidden from sharing public toilet buildings with men – with this design we have the option, for example, to make 1 room female-only. This is the intersection impact Nik was talking about.

We should consider the scale of any negative impacts versus the positive. This is why it's helpful to understand the demographics of our visitors, to allow limited resources to be appropriately allocated.

Our EqIA also considered how the changes would impact the safety of vulnerable groups, so the design includes passive surveillance and gender sensitive design.

This is intended to make the space for comfortable and safe for vulnerable groups, while maintaining privacy with the entrances at 90 degrees to the vestibule

For example, the individual toilet rooms with sinks have their own full-height doors for privacy (they are not cubicles)

- They open onto a vestibule that is visible to visitors on either side of the structures (passive surveillance, using the layout of the site and the areas that people frequent to help the space feel open and safe).
- There is buffer space included in the design between the accessible and the enlarged toilet, and the main thoroughfare to give extra space for users to enter/exit and avoid collisions (doors open outward)

- The seating benches outside also offer additional resting/waiting points for families or older people, sheltered beneath the canopy

Considering elements like these can have a positive impact for vulnerable persons.