

## Workplace Adjustments Policy

This policy describes Whitbread's approach to and provision of workplace adjustments for applicants and team members who have (or develop) a disability or long-term health condition and may need to have adjustments to the way they do their jobs as a result of the effect of their impairment (for ease of reference the term disability or disabled person will be used in this policy). It sets out the roles and responsibilities of managers, team members and any other roles involved in the process as well as the organisation as a whole.

### Who is this for?

This policy applies to:

- Team members
- Line managers (Hotel/Restaurant General Manager in operations or direct line manager in Support Centre)
- Regional Operations Managers
- Head of department
- Employee Relations Delivery Managers

In the following countries:



### Why is this important?

As outlined in our [Diversity and Inclusion policy](#), at Whitbread we believe that our teams should be as diverse as the communities that we serve and a place where you will be welcomed, be able to be yourself at work, and feel a sense of belonging.

We recognise the importance all our people can play in our business and that reasonable flexibility may be required to achieve the same output. Those with a disability need to feel confident in applying for employment with the company, to feel comfortable to disclose whether they have a disability, to raise issues with their managers and discuss their specific workplace adjustment requirements and for the company to provide the appropriate support to make this happen.

This policy and associated guidance outlines what is required to ensure all workplace adjustments are identified and provided consistently and in a timely manner.

We are committed to taking a best practice approach to defining what is meant by disability. Rather than being limited to a legal compliance approach as highlighted in the Equality Act, wherever possible we will seek to provide an adjustment where it is

needed before seeking “proof” by a professional body unless that is to ensure an adjustment is appropriate to assist team members to achieve the outcomes of their job role. However, it is important for you to understand that for an adjustment to be considered it should be discussed with your line manager.

The legal definition of disability in the Equality Act 2010 is:

“A physical or mental impairment, which has a long term, substantial adverse impact on day-to-day activities.”

Whilst we are always open to considering other ways of working and any adjustments that may assist in carryout out work, those who have a disability are entitled to have reasonable adjustment made to assist in carrying out their role. We will consider any matter carefully and look to accommodate any needs within reason.

Taking steps to remove or minimise the impact of a barrier will reduce the impact of the persons disability and allow them to access these opportunities.

Our approach is therefore to ensure that where possible and reasonable, we will make adjustments to allow colleagues to carry out their role. This will help us to develop an inclusive approach across the board, so that a person’s impairment should not be a barrier to their employment and any opportunities within Whitbread. The focus will be on whether the team member needs us to do consider doing something differently and whether this is reasonable.

### **When does it apply?**

All applicants and team members should be made to feel comfortable to disclose whether they have a disability during recruitment or with their line manager should they wish to do so. They will be able to do this through functionality in our HR system, however, the implementation of any workplace adjustments is not solely dependent on a team member saying they have a disability.

This policy applies to all aspects of a team members working life with Whitbread. This includes:

- recruitment, selection, and appointment
- induction and onboarding
- training and career development
- performance management
- absence management
- promotion, transfer, or any other employment benefit.

### **What makes it work?**

#### Adjustments

Adjustments are about recognising that we need to ensure we provide equitable adjustments to ensure that everyone can realise their full potential. Focus must be

on identifying which adjustments are needed for someone to do their job differently whilst achieving the required outputs of the role.

In reality an adjustment can be anything that removes and/or minimises any disadvantage faced by a team member to perform their job role. Whether any adjustment is made will depend on whether the adjustment required is reasonable. Some examples of reasonable adjustments include:

- Provision of specialist equipment, e.g. keyboards, notetakers
- Amendment to procedures e.g. changing shift patterns for team members
- Time off for medical treatment, e.g. regular check-ups or physiotherapy
- Changes to the built environment, e.g. provision of ramps, visual fire alarms
- Adaptations to standard location and duties, e.g. allowing working from home or in a different job
- Provision of training, e.g. on the use of adaptive technology
- The provision of support workers, e.g. British Sign Language (BSL) interpreters, readers
- Flexibility in tasks undertaken, e.g. in supporting a team member who is experiencing a period of mental ill-health

This list must be seen as illustrative and line managers and team members are encouraged to think creatively about what can be done to facilitate achieving someone's outputs and removing any barriers they may face as a result of having a disability.

#### What is reasonable?

Whether an adjustment is reasonable will depend on a number of things, including:

- Costs: considering both direct and indirect costs
- External resources: the availability of expertise and funding
- Practicability: ensuring the adjustment identified will address the specific barrier
- Impact on others: reflecting on whether the adjustment is likely to stop others using the service?
- Nature of the role: adjustments such as regular breaks, start and stop times, working from home (if applicable).
- Health and safety: what are the health and safety implications, bearing in mind that H&S legislation takes precedence over the Equality Act. Examples of this may be working hours that breach the Working Time Regulations or working as a Lone Worker if the team member has a condition which means they could not confidently ensure the safety of themselves or guests.

Where the adjustment required is reasonable, action should be taken to put this into place and the focus will be on supporting the team member with their requirements.

We expect line managers to take a positive and proactive approach to what they consider to be reasonable. This conversation should include the team member and if needed the Regional Operations Manager or Head of department, when deciding

what is reasonable. It is also important to ensure any reasonable adjustments agreed are communicated to all those who should be made aware of them (i.e. if there is a change of line manager) and details are recorded on the HR System.

More detail can be found in the **How does it work?** guidance.

The table below outlines roles and responsibilities team members at Whitbread have for making this policy work:

## TEAM MEMBERS

Accountable for:

- Discussing any workplace adjustment requirements with their line manager.
- Completing the relevant forms as outlined in the **How does it work?** section with the line manager recording the detail of what has been agreed. Ensuring the forms are kept secure and available for future line managers to review if required.

Responsible for:

- Providing details, ideas or examples of reasonable adjustments that could help in the discussions with the line manager, through completing the relevant details on the HR System.
- Working with the line manager on providing medical information where required when working through the welfare process as outlined in the [Sickness policy](#)

## LINE MANAGERS

Accountable for:

- Initiating and leading discussions around workplace adjustments with team members.
- Considering what is reasonable in the relevant circumstance to support conversations.
- Actioning any agreed reasonable adjustments with the team member.
- Ensuring regular communication with the team member during and after the process.
- Updating the HR System with details of any agreed reasonable adjustments.

Responsible for:

- Consulting with Regional Operations Manager or Head of department on any reasonable adjustments to be made to ensure consistency and best possible team member experience.
- Escalating any disputes on what is considered reasonable to Regional Operations Manager or Head of department for further consideration.

- Completing a request form should the agreed adjustment require capital expenditure.
- Signposting team members to Access to Work if recommended as part of the process.

### **REGIONAL OPERATIONS MANAGER or HEAD OF DEPARTMENT**

Accountable for:

- Ensuring consistency of approach for workplace adjustments across teams responsible for.
- Making final decisions on what is considered reasonable where a dispute exists between a line manager and team member.

Responsible for:

- Consulting with the Employee Relations Delivery Manager on requests that may need further consideration.

### **EMPLOYEE RELATIONS DELIVERY MANAGER**

Responsible for:

- Providing counsel to line managers, Regional Operations Managers or Head of Department on requests that may need further consideration.
- Liaising with internal teams and or external agencies to support with requests needing further consideration or funding.

### **DIVERSITY AND INCLUSION TEAM**

Accountable for:

- Governing the overall approach to workplace adjustments, in line with current legislation as well as external best practice.
- Providing line managers with adequate training and education on workplace adjustments
- Responding to completed request forms and determining the outcome for items that require capital expenditure.
- Signposting line managers as required to utilise Access to Work.
- Reviewing outcome reports from any Access to Work assessments and providing the required actions as appropriate.

Confidentiality and record keeping

All information shared by applicants and team members regarding their disability must be treated as personal sensitive data and will be collected, stored, shared and used accordingly.

Details of a team members agreed workplace adjustments will be recorded on the Workplace Adjustments form (see **How does it work?**) and on the HR System.

### **How does it work?**

More information how this policy works and what further support is available can be found in the links below.

#### Guidance

Workplace Adjustments Guidance

### **Updates to this policy**

Published **November 2022**

Last updated **November 2022**

- Replaced previous Disability Awareness Policy to restate Whitbread's position on Workplace adjustments and make clearer accountabilities/responsibilities for team members and line managers.