A newsletter from irwinmitchell

Edition 7 - Winter 2016

Focus on Employment

Is time spent travelling classed as "working time"?

>> How not to handle a disciplinary

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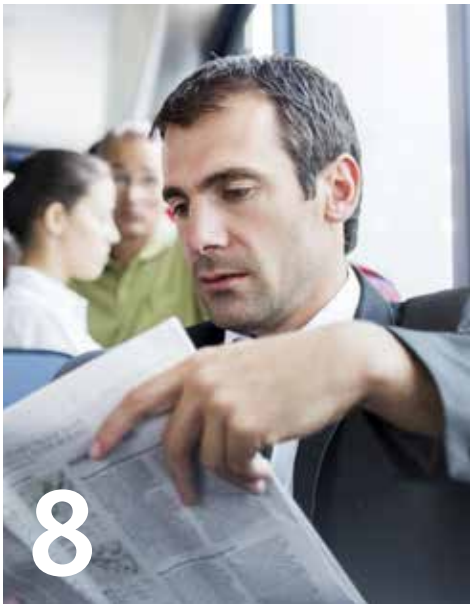
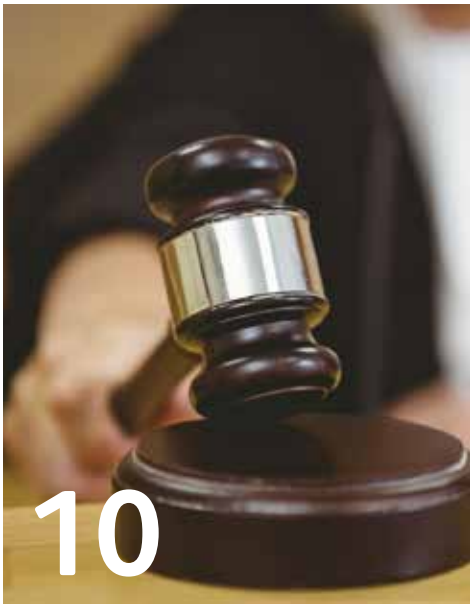




LEGISLATION TRACKER:

What does 2016 have in store?

2016		
1 January	Whistleblowing	"Prescribed persons" are required to produce annual reports of whistleblowing disclosures (without identifying the worker who made the disclosure, their employer or other person about whom the disclosure was made).
11 January	Zero hours contracts	Regulations came into force which provides the right to unfair dismissal protection for employees working under a zero hours contract, who are dismissed because the employee has failed to comply with an exclusivity clause.
February	Recruitment agencies	The Government intends to reform the regulation of recruitment agencies.
1 April	National Living Wage	National Living Wage for workers aged 25 and over will be introduced at the rate of £7.20 per hour.
6 April	Statutory payments for SMP	There will be no increase in the weekly rates. These will remain as follows: • SMP, SAP, PP and ShPP - £139.58 per week • Sick pay - £88.45 per week.
Date TBC	Trade unions	Proposed trade union reforms expected to take effect.
Date TBC	Exit payments and apprenticeships	The Enterprise Bill 2015-16 will introduce: • A £95,000 cap on exit payments made to public sector workers to end six-figure payoffs • Regulations to restrict the use of the word "apprenticeship" to Government-accredited schemes and to increase the number of public sector apprenticeships offered.
Date TBC	Gender Pay Reporting	Section 78 of the Equality Act 2010 enables the Government to make regulations requiring employers with over 250 employees to publish their gender pay gap. The Government's response to the consultation is expected soon.

CASE TRACKER:

What does 2016 have in store?

Case	Court	Issue
Working time		
Lock and others v British Gas Trading Ltd and another	EAT	Whether the Working Time Regulations (WTR) can be read in line with the Directive. In particular, whether the week's pay provisions of the Employment Rights Act 1996 should be re-written for the purposes of the WTR's so that commission and similar payments are included in holiday pay. Case was heard on 8/9 December 2015. The decision is not yet available and is not likely to be given until March/April 2016. If the Tribunal rules in Mr Lock's favour another date will be set down to determine how much compensation he will receive.
The Sash Window Workshop Ltd and another v King	Court of Appeal	Are workers entitled to carry holiday over to the next year where they are unable to take their holiday for reasons beyond their control, as an exception to the usual rule that holiday entitlement expires at the end of a leave year? To be heard on 9 or 10 February 2016.
Collective consultation		
USDAW and another v WW Realisation 1 Ltd (in liquidation), Ethel Austin Ltd and another (the "Woolworths" case)	Court of Appeal	Following the ECJ's decision that the Collective Redundancies Directive does not require that the number of dismissals in all of an employer's establishments be aggregated in order to determine whether the threshold for collective redundancy consultation is met, the Court of Appeal will determine whether, on the facts, each branch of Woolworths and Ethel Austin was a separate establishment. No date has been set for this to be heard.
Discrimination		
First Group PLC v Dough Paulley	Supreme Court	Permission to appeal has been granted against the Court of Appeal's decision that a bus operator whose policy was to merely request, but not require, passengers to move out of wheelchair spaces to make way for wheelchair users was not in breach of the Equality Act 2010. No date has been set for this to be heard.
De Souza v Vinci Construction UK Ltd	Court of Appeal	The Court of Appeal will determine whether the 10% uplift on general damages in civil claims should apply to Employment Tribunal claims. Judgment is expected in 2016.

Harrod v Chief Constable of West Midlands Police and others	Court of Appeal	Appeal against the decision that the compulsory retirement of large numbers of police officers could be objectively justified and was therefore not indirectly discriminatory on age grounds. To be heard on 31 January or 1 February 2016.
Whistle-blowing		
Chesterton Global Ltd (t/a Chestertons) and another v Nurmohamed	Court of Appeal	Appeal against the EAT's decision that it is not necessary to show that a disclosure was of interest to the public as a whole, as only a section of the public will be directly affected by any given disclosure and that a small group may be sufficient. To be heard on 11 or 12 October 2016.
Contracts of employment		
Sparks v Department for Transport	Court of Appeal	Appeal against the High Court's decision that the Department for Transport was not entitled to unilaterally change the terms of its staff handbook, which the court found had been incorporated (in part) into its employees' contracts of employment. To be heard on 16 or 17 February 2016.
Atypical working		
Moran and others v Ideal Cleaning Services Ltd and another	Court of Appeal	Appeal against the EAT's decision that the Agency Workers Regulations 2010 did not apply to a group of agency workers who were assigned to one hirer for periods ranging between 6 and 25 years. To be heard on 2 or 3 March 2016.
Unions		
British Airline Pilots' Association v Jet2.com Ltd	Court of Appeal	Appeal against the High Court's decision which found that the airline was not required to negotiate with a recognised trade union over pilots' rostering arrangements in circumstances where the specified method of collective bargaining had been imposed by the Central Arbitration Committee. To be heard on 9 or 10 November 2016.
Tribunals		
R (Unison) v Lord Chancellor and another	Supreme Court – permission to appeal lodged	The Court of Appeal dismissed Unison's challenge to the introduction of fees in the employment tribunals and EAT.
Data protection		
Dawson-Damer and others v Taylor Wessing LLP and others	Court of Appeal	It was not reasonable or proportionate for the solicitors' firm to carry out lengthy and costly searches of files dating back at least 30 years to determine whether or not information requested was protected by legal professional privilege in order to comply with subject access requests sought under the Data Protection Act 1998. To be heard on 19 or 20 July 2016.

Large employers must spend 0.5% on apprenticeships

The Chancellor in his recent spending review announced that large employers (those with a wage bill of £3 million or more) will have to commit to spend 0.5% of their payroll on funding apprenticeships from April 2017. The Government estimates that this will affect less than 2% of UK employers.

Prosecution of ex-City Link Directors fails

The case brought against three ex-directors of City Link has failed. It was brought following their failure to promptly inform the Secretary of State of its proposals to make 2,000 redundancies. The judge ruled that the three defendants had every hope of saving City Link and its workforce by placing the company into administration and notified the Government when it became clear that this would not happen.

£9 million illegal working penalties issued in three months

In the first three months of 2015, the total number of fines issued to employers for employing workers without the right to work in the UK was £9 million.

British Bill of Rights will replace Human Rights Act

The Government has delayed starting a 12 week consultation about its decision to abolish the Human Rights Act and to replace it with a new Bill of Rights to give it further time to consider the issues.

Only eight financial penalties ordered

Since 2014, Tribunals have been able to impose financial penalties of up to £5,000 on employers who breach workers' rights where there is some form of "aggravating conduct". Despite this, only eight penalties have been ordered and of these, six remain unpaid.

Recruitment is not 'name blind'

The Government has announced that a number of large private and public sector organisations (who together employ 1.8 million employees in the UK) have committed to name-blind recruitment processes following research which showed that people with "white sounding" names are nearly twice as likely to get call-backs as those with "ethnic sounding" names. This means that applicants' names will not be visible on application forms. It is hoped that this step will help improve diversity.

Grandparents to get shared parental leave

The Government has announced that the right to take shared parental leave will be extended to grandparents. It is not yet known if mothers will only be able to select one person to share the leave with (which would be relatively straightforward if this simply included the option of selecting a grandparent rather than their partner) or if grandparents can be chosen as well as the partner (which would be extremely complicated and potentially involve three different employers).

easyJet compensates staff for underpayment of holiday pay

easyJet has agreed to include commission in calculating cabin crews holiday entitlement and will also compensate eligible staff for underpayment of holiday for the two preceding years.

62% of employers approve National Living Wage

Research by Group Risk Development has found that 62% of employers said that they agreed with the introduction of a mandatory National Living Wage of £7.20 an hour in April 2016 for employees aged 25 and over. The research was undertaken in September 2015 among a sample of 501 UK businesses with between 5 and 1,000 employees.

Zero hours guidance published

The Government has published guidance for employers on the use of zero hours contracts which sets out when they should, or should not, be used. Employers are not obliged to follow this.

How ~~not~~ to handle a disciplinary process

You are asked for advice from an inexperienced line manager handling their first disciplinary process who is making a real hash of it. Do you take over and get the whole thing back on track?

A recent case *Ramphal v Department for Transport* provides some salutary guidance.

The facts

Mr Ramphal's job involved a lot of travel. He was supplied with a hire car and a company credit card which he could use to pay for fuel and other expenses.

A routine audit highlighted 50 concerns about his expenses. These were all investigated by his line manager who accepted Mr Ramphal's explanations. There was then a further audit and four further concerns were identified. A manager called Mr Goodchild (who had no prior experience of disciplinary investigations) was appointed to investigate and determine if there was a case to answer. He did his best and produced for HR's approval a report which concluded that Mr Ramphal's explanations for his expenditure were "consistent" and "plausible". He considered that the most appropriate course of action was a warning for misconduct.

The HR department set to work on the report and over a staggering five month period, the report metamorphosed into finding that Mr Ramphal had been dishonest and it was appropriate to dismiss him for gross misconduct. Mr Goodchild, presumably buoyed up with confidence, went ahead and dismissed Mr Ramphal who promptly claimed that he had been unfairly dismissed.

Decision

Although the Employment Tribunal, initially, found that the dismissal was fair the Employment Appeal Tribunal referred the case back to the Tribunal to find out what happened between the first and final draft versions of the report.

The Tribunal will have to determine if HR's input "strayed" from providing advice on the law or procedure to be followed (which is permissible) or if they influenced the decision (which is not). If the Tribunal finds that the decision to dismiss was not Mr Goodchild's alone, the dismissal is likely to be found to be unfair.

Lessons for HR

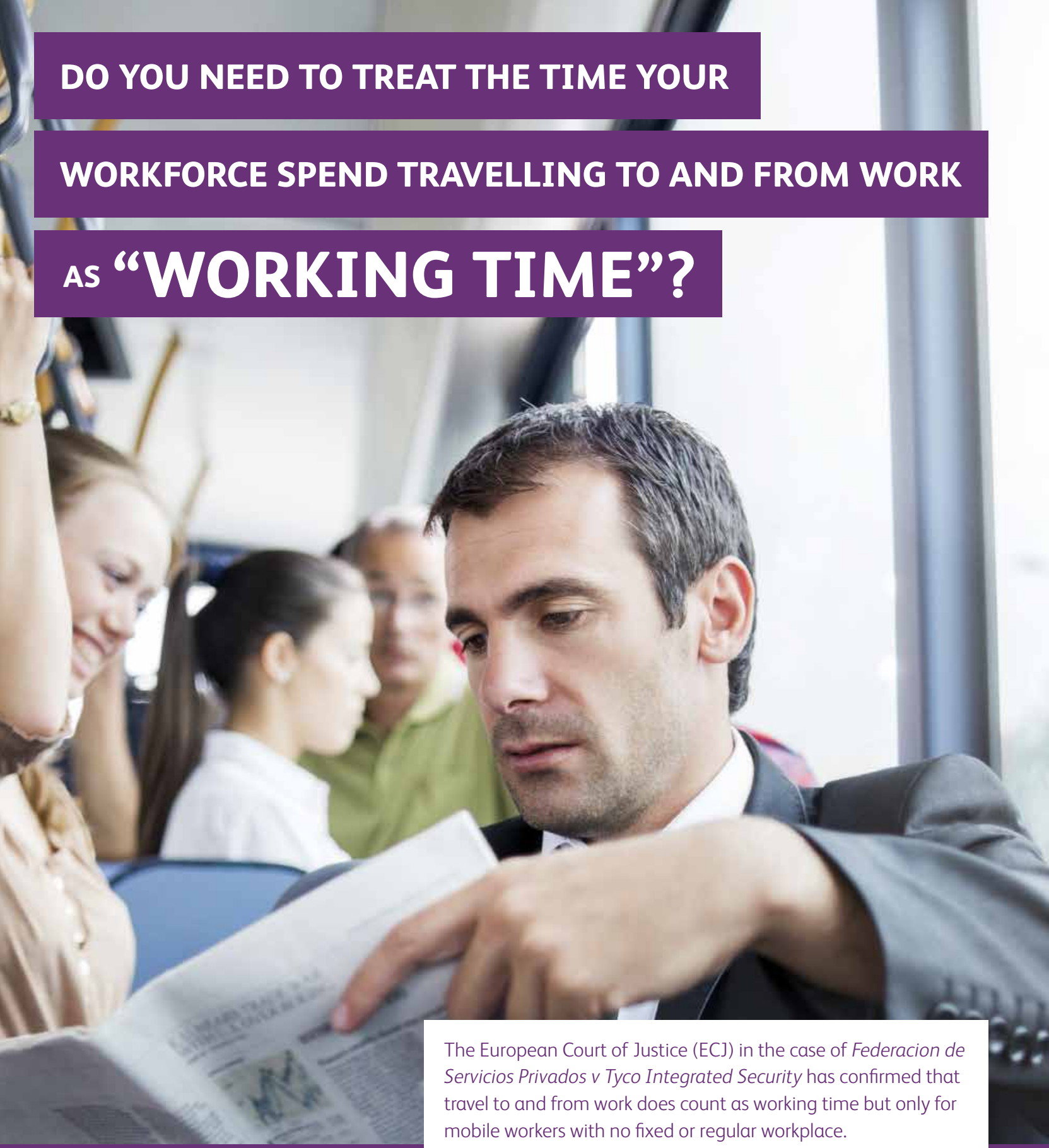
Do:

1. Remember that you will be required to disclose all correspondence (including drafts of reports or letters) if you receive a legal claim because these types of documents do not attract legal privilege.
2. Set out in writing the relevant legal issues the investigator or disciplinary manager should consider before they start the process and the sanctions that might be appropriate (and have been given in other similar cases).
3. Give advice in writing on the law and procedure to be followed – such as who it might be appropriate to interview, the burden of proof and how to record the findings.
4. Make sure that the investigating officer has asked all relevant questions. If something has been missed (particularly if it might affect the decision), it is perfectly permissible to ask the investigating officer to re-consider and re-interview witnesses or interview new witnesses. It is also fine to ask the officer to explain their thought process or conclusions if their rationale is unclear.
5. Provide training for all investigating officers. A lot of potential problems with investigations (e.g. incomplete reports, inconsistencies in the approach taken to investigations and the burden of proof) can be avoided if those who are carrying out investigations have been properly trained.

Don't:

Alter a report or the recommendation (this includes omitting the bits you don't like or disagree with) or make the decision for the officer, or give the impression that you have done so!

DO YOU NEED TO TREAT THE TIME YOUR WORKFORCE SPEND TRAVELLING TO AND FROM WORK AS "WORKING TIME"?



The European Court of Justice (ECJ) in the case of *Federacion de Servicios Privados v Tyco Integrated Security* has confirmed that travel to and from work does count as working time but only for mobile workers with no fixed or regular workplace.

Here are the answers to some of the top questions we have received about the implications of this decision.

1 How does this ruling affect workers whose contracts state that they are based at one location but in practice are rarely there?

The decision did not explicitly deal with this scenario and the position is uncertain. However, there is certainly a good argument that if the employee elects to work in a different location (rather than being directed to do so) then their additional travel time will not have to be included.

Even if they are directed to work at other offices from time to time, the fact that they do have a fixed place of work could mean that it falls outside the scope of this decision.

2 Does this ruling apply to a group of peripatetic employees who travel to different workplaces in transport provided by us?

The decision applies to workers who have no fixed or habitual place of work and are required to travel to different locations to perform their duties. It does not make any difference if they travel in their own vehicles or in transport provided by you.

The workers have to travel to get to their designated workplace and it is difficult to see how this is not an inherent part of performing their duties. This would be different if they had a fixed place of work as any travel would be deemed to be "commute time" and would not be counted as "working time".

Although there is a clear difference between driving to work and being a passenger, travelling in transport provided by you will not be "rest time". Time has to be spent working or resting and there are no grey areas (in law, rather than in practice). You determine where your staff work (and in most cases how they get there). Either way, the employees have no control over their place of work.

3 Our staff meet at a designated meeting place and we then take them to their workplace. Can we argue that the designated meeting place is their place of work?

It is possible (though not very likely) that the designated meeting place could be considered to be the worker's fixed or regular workplace. Even if it was, this may not be of much help, particularly if most of the workers do not live far away from this as only the time spent travelling to and from the meeting point would be excluded. All other time, including waiting time if the transport was late would be deemed to be working time.

4 Does this case affect mobile workers engaged on long term projects?

There might be an argument that this case does not apply to workers engaged on long term projects where they remain at the same place for a certain period of time, but that will have to be tested in due course.

Workers who move from one place to another perhaps on a weekly, or on a slightly longer basis will not have a usual place of work and are likely to be covered by this decision.

5 Does this ruling to count travel time at the start and end of a journey take immediate effect in the UK? Should we be changing our processes now?

This case has immediate application to UK businesses and if some of your workers are affected you must include time spent travelling in their working time calculations.

6 Does this ruling mean that we have to pay the National Minimum Wage for each hour of travel?

No. There is no connection between the Working Time Directive and the National Minimum Wage (NMW) legislation and the NMW legislation is unaffected by this decision.

However, it is possible that workers might seek to bring breach of contract claims where their contracts expressly provide that working time will be paid (as might be the case where the worker is paid an hourly rate for each hour worked).

That said, this does not mean that travel time necessarily has to be paid at the same rate and, depending on the contractual provisions, it might be possible to differentiate between working and travel time to and from work. You may also be able to argue that this case made it clear that it was up to member states to determine the appropriate rate of pay for travel time and until the Government deals with this, no liability arises.

7 One of our employees is based at our head office but travels from home to different customers several times a week. Do we have to count the time he spends travelling to and from home?

No. Your employee has a fixed place of work and it is not necessary to count the time he spends travelling to and from home as working time.

8 We have a mobile workforce that will be affected by this decision. Can we stipulate how long we think their journey's should take and refuse to include any time in excess of this?

You must include all time that your workers spend travelling in performance of their duties, but not for any time that they spend on personal matters (such as running errands on their way home).

You can determine the order in which your staff visit customers (to limit the amount of travel time) and can audit their journeys and check to see how long they have taken. If the travel time appears to be excessive you are perfectly entitled to ask the employee to account for this (and in appropriate cases to discipline him/her) if their claims are incorrect.

9 Will this case affect provisions relating to rest periods and average working weeks?

Potentially, yes. You will need to make sure that your record keeping for each worker includes time spent travelling at the beginning and end of the day and provide appropriate statutory rest periods (which are determined by reference to age and whether a worker works during the day or night).

Including hours spent travelling may also push a worker's working week over the 48 hour maximum (which is averaged over a 17 week period unless extended by agreement) and, if it does so, you must ensure that your worker enters into an opt-out agreement.

It is helpful to ask workers to sign an opt-out at the start of their employment – even if you do not anticipate it will be required. Remember, that employees must not be forced or otherwise coerced into signing an opt-out and are also entitled to give notice to terminate their opt-out.

CASE LAW UPDATE

Does TUPE apply if a majority shareholder takes over the activities of a subsidiary which has been wound up?

Yes, according to the ECJ in the case of *Ferreira da Silva e Brito and others v Estado Portugues*.

Background

TAP was the majority shareholder of Air Atlantis which provided a number of charter flights. Air Atlantis was wound up after the winding up had been completed, TAP started to operate some of the routes that Air Atlantis had previously operated using the aircraft, offices, equipment and employees of Air Atlantis.

A number of employees had been dismissed due to redundancy when Air Atlantis had been wound up, and they brought a claim that they should have transferred to TAP and they sought compensation.

Decision of the CJEU

This was a transfer of an undertaking. The key point was that the entity had kept its identity - TAP had taken over routes, aircraft, activities and employees. Although they had been integrated into TAP's activities, there was a clear link between the assets and employees and the activities that they had carried out whilst working for Air Atlantis.

How does this affect your business?

In a situation where the business, or part of the business being taken over, has been wound up do not presume that a transfer situation will not arise. It is essential to look at the nature of the business before the winding up and to compare this to the business that remains. In some cases it is possible to differentiate between asset reliant undertakings and labour intensive ones. In this case, the transfer of key assets (the airplanes) was decisive.

TUPE: Do employees who are temporarily laid off work at the time of a service provision change transfer to the subsequent contractor?

The EAT held that they might in the case of *In Inex Home Improvements Ltd v Hodgkins*.

Background

There must be an 'organised grouping of employees' in a transfer situation. If, for example, there is a change of service provider but there is not an organised group of employees working on that service, no-one will transfer.

What happens if there has been a temporary lay-off situation?

Here a group of employees worked for Inex on a contract referred to as the 'Sandwell' contract. The work under this contract was released in a series of tranches. There was a gap between one tranche of work being completed and the next being released and, as a result, the employees were temporarily laid off.

It was then decided that the next tranche of work would not be given to Inex but to Localrun, another provider. The employees argued that they should transfer to Localrun, but it disagreed because they had been laid off. It argued that they were not part of the organised grouping of employees immediately before the transfer.

Decision

The EAT made it clear that a temporary absence from work, or a temporary cessation of the relevant activities does not, in itself, deprive employees who had been involved in the relevant activities of their status as an organised grouping of employees.

How does this affect your business?

This case was remitted back to the Tribunal to determine if these employees were an organised group immediately before the transfer. It is likely that the Tribunal will find that they were.

The key question will be to determine if the workers who have been laid off were an organised group who were assigned to the part of the business being transferred. If they are then they will transfer to the new employer. It is probably safer to assume that workers who are temporarily laid off and who worked on the transferring contract, will transfer and treat them in the same way as those who are on holiday or ill at the time of the transfer.

Dismissal: Is it fair to dismiss a disabled employee for refusing to follow a return to work plan?

The EAT said that it was fair on the facts in the case of *Rochford v WNS Global Services (UK) Ltd and others*.

Background

The Claimant was a senior manager who suffered from a disabling back condition. He was absent from work from February 2012 on generous sick pay (which lasted until his dismissal). Some months later his position was medically assessed, leading to the conclusion that there should be a phased return to work. The employer decided that he should return to restricted duties which formed part of those he was contractually obliged to undertake. He refused to do so, considering that this was a demotion.

The employer did not make it clear that the long term aim was for the employee to return to his previous role. Despite a number of discussions, the employee continued to refuse and was warned that he would be dismissed if he did not agree. He was eventually dismissed and brought claims for disability discrimination, unfair dismissal and wrongful dismissal.

Decision

The Tribunal upheld some elements of the discrimination claim (but not those linked to the dismissal) and also found that the dismissal was substantively fair but procedurally unfair. The wrongful dismissal claim was dismissed.

Following an appeal, the EAT agreed with the Tribunal's conclusions. The reason for Mr Rochford's dismissal was because of his conduct – not his disability. He had refused to do any work, despite having been warned about the consequences of doing so. His conduct amounted to gross misconduct and his employer was entitled to dismiss him without notice.

The EAT did note that if the employee thought that the employer was acting unreasonably, he could have resigned and claimed constructive dismissal or worked under protest. To simply refuse to do any work was not acceptable.

How does this affect your business?

The case demonstrates that the fact that there has been an element of unlawful discrimination does not mean that any ultimate dismissal must be unfair (but often will be).

It is good practice, when an employee is returning from a long term absence to try to agree a return to work plan to avoid these types of problems. However, as long as the employee is medically fit to undertake the work set out in a return to work plan, you can discipline and ultimately dismiss if the employee refuses to do so.

Dismissal: Can a trade union representative be dismissed whilst participating in union activity for a non-union related reason?

The EAT found that the employer had fairly dismissed an employee in *Azam v Ofqual* because the employee had been dismissed for misconduct and not because she was a union representative.

Background

Ms Azam was the employee union representative (and later the Branch Chair) of the PCS union which was recognised by the employer. She had raised a number of grievances on behalf of members (some of which remained unresolved).

The employer wished to make significant changes to its pay and grading arrangements and meetings took place with Ms Azam in her capacity as PCP Branch Chair. During those discussions, the employer disclosed a spreadsheet detailing each of the roles in the organisation together with the old and proposed new grades. That information was disclosed to her on the strict condition that it was confidential and should not be disclosed to anyone else, or used for other purposes.

Despite this, Ms Azam emailed copies of the spreadsheet to branch members. She attempted to avoid suspicion by referencing her email with a neutral title. Her employers only became aware that she had done so when they received a complaint by another member of staff that sensitive information had been disclosed to PCS colleagues. Following an investigation, Ms Azam was dismissed for gross misconduct.

She brought a claim arguing that her dismissal was automatically unfair because the real reason for the dismissal was her trade union activities.

Decision
Her claim was unsuccessful. It was held that the real reason for her dismissal was because she had sent out confidential information and not because of her role as a trade union representative.

How does this affect your business?
Many employers tread carefully in trade union matters as unionised workplaces are often quick to defend their members. Here staff went on strike to protest against Ms Azam's dismissal (the union was unaware that she had breached confidentiality).

If you can prove that a decision to dismiss a union member was genuinely because they committed an act of gross misconduct, the dismissal will be fair.

Dismissing an employee because of their trade union activities will be automatically unfair, meaning that there is no requirement for the employee to have a minimum period of service to bring a claim of unfair dismissal. In addition, dismissal for this reason will attract a minimum basic award of £5,807.

Can an employee claim victimisation by association?
The Tribunal agreed that a claim for associative victimisation is possible (and this aspect of the decision was not appealed) in *Thompson v London Central Bus*.

Law
Victimisation occurs when an employee is treated less favourably because they have carried out a 'protected act'. A protected act is when an employee has previously made a complaint or claim of discrimination, or supported someone who has made such a claim.

Background
Mr Thompson was a bus driver who said he had overheard a conversation in which it had been alleged that management had, some 20 years earlier, conducted a campaign to get rid of certain employees who had made allegations of racism against management.

He said that he had recently repeated the conversation to a manager who, shortly afterwards instigated disciplinary proceedings against him which had resulted in his dismissal. Following a successful appeal, this sanction was replaced with conditional re-instatement. Mr Thompson said that he was associated with the protected acts (the allegations of racism) because he had heard about them and therefore had knowledge and that this, coupled with the timing of events, established a causal link. In response, the Respondent produced a clear paper trail demonstrating that the disciplinary action was attributable to Mr Thompson's contravention and abuse of the health and safety requirements concerning the wearing of hi-visibility jackets.

Decision
The Employment Tribunal decided that the Equality Act 2010 does protect employees against associative victimisation but, in this case, it found that the association between the employee and those who had carried out the protected acts was too weak or 'of the wrong sort' for a claim of associative discrimination to be successful and it therefore struck out the claim.

The Employment Appeal Tribunal said that the Tribunal's reasons for rejecting the case were wrong. The appropriate test was whether the employer subjected an individual to a detriment by reason of the protected acts of others. It stated that there is no requirement for there to be any particular form of association.

How does this affect your business?
This decision suggests a significant shift in the law and a willingness to permit associative discrimination claims to be brought outside of direct discrimination claims (which have been permitted for some time).

If a member of staff (subject to a disciplinary process) alleges that he/she is being subjected to a disciplinary process/sanction because of their previous support for a colleague's discrimination claim/complaint, you should suspend the disciplinary process and investigate before deciding how to proceed. Do not assume that the employee is making this up (he/she might be but you won't know unless you investigate), or that the events took place a long time ago and are therefore irrelevant.

Is an issue which affects only four employees in the public interest (and the disclosure protected by whistle-blowing legislation)?
Possibly, according to the EAT in *Underwood v Wincanton Plc*.

Facts
Mr Underwood and three of his colleagues made a complaint about the way that overtime was being allocated in their organisation. This complaint was addressed but Mr Underwood was dismissed. He argued that he had been dismissed for making a protected disclosure, but the employer argued that this situation could not be a protected disclosure because the issue relating to overtime only related to a small number of employees and could not, in any event, be an issue that was in the 'public interest'.

Decision
The EAT said that the case had to go back to the Tribunal to reconsider in the light of the Chestertons case which made it clear that a relatively limited number of work colleagues could potentially constitute the public for these purposes.

How does this affect your business?
Although the public interest bar is not set very high, it is extremely unlikely that Mr Underwood will succeed with his case. It is difficult to see how three individuals can constitute the "public", or in this case, whether Mr Underwood had any reasonable belief that the public really needed to know how his overtime arrangements were determined.

However, it is probably safer to treat a complaint that refers (even vaguely) to other people within the organisation, and might on a generous interpretation be a protected disclosure, in accordance with your whistle-blowing policy.

The best defence to any genuine whistle-blowing claim is to demonstrate that the reason you made a decision about the employee was completely unrelated to anything they might have told you.

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