

ICG PREGNANCY LOSS POLICY

1. INTRODUCTION

1.1 PURPOSE

To provide a policy and associated procedures in order to support colleagues who have suffered the loss of a pregnancy.

1.2 SCOPE

This policy applies to all permanent and fixed term employees only. It does not apply to agency workers, consultants, self-employed contractors, volunteers or interns.

This policy is for guidance purposes only and does not form part of your contract of employment. ICG may, at its absolute discretion, amend this policy from time to time.

2. POLICY STATEMENT

As a Company we recognise that pregnancy loss is extremely distressing and can have significant physical and emotional consequences, which may affect a colleague's attendance or performance at work.

We are committed to supporting our colleagues if this happens and to give the time needed to grieve and recover.

We hope that these measures can go some way in helping to ease the distress which many face under such heart-breaking circumstances and provide support to our colleagues when they need it most.

3. RELATED POLICIES AND DOCUMENTATION

- Attendance Management policy
- Primary Care Giver policy
- Secondary Care Giver policy

4. POLICY DETAILS

4.1 Eligibility

This policy sets out the support available to all employees globally, regardless of gender or how they identify, who have experienced or are experiencing pregnancy loss (or whose partner has experienced and or is experiencing pregnancy loss). Here, we are referring to a miscarriage, ectopic pregnancy, molar pregnancy, abortions, stillbirth or death following a birth. This policy is also applicable to those employees who were having a child through a surrogacy arrangement and whose surrogate has experienced pregnancy loss.

4.2 Telling us about your pregnancy loss

Colleagues do not have to tell us when they have suffered pregnancy loss.

However, should they feel able to, we encourage colleagues to tell their Manager or HR Business Partner at an early stage, so that we can provide any necessary support.

Any information given to line managers and HR is confidential. Other colleagues will only be told about the pregnancy loss if this is discussed and agreed between the relevant colleague and their Manager or HR Business Partner.

Where a colleague has suffered pregnancy loss (or their partner has suffered pregnancy loss) after the first 24 weeks of pregnancy, it may be necessary for this be registered as a stillbirth and certain statutory rights may apply. In this situation, we strongly urge colleagues to inform us so that we can advise them of their right to take statutory or Company leave in accordance with our Primary Care Giver Policy and Secondary Care Giver Policy.

4.3 Leave

Pregnancy loss in first 24 weeks of pregnancy

In the sad circumstance where a colleague suffers pregnancy loss (or their partner suffers pregnancy loss) during the first 24 weeks of pregnancy, colleagues are entitled to up to three weeks bereavement leave on full pay.

This bereavement leave can be used to attend medical or counselling appointments for themselves or their partner or to manage working more flexibly which could include more breaks, reviewing and reprioritising of workload, and reduced working hours. This leave does not need to be taken in one block but can be taken as individual days.

If a colleague needs more time off beyond the three weeks bereavement leave to recover from the physical and emotional consequences of the pregnancy loss, it is encouraged that the employee discuss their situation with their Manager and/or HR Business Partner.

In the event that, following the three weeks bereavement leave, a colleague is unwell and unable to attend work following a pregnancy loss, it may be appropriate that this be handled under our sickness absence policy. Where a colleague is self-certifying sickness absence following a pregnancy loss, or submitting a fit note from their doctor, in accordance with our sickness absence policy, it should be noted that this absence is “*pregnancy related*”.

Pregnancy loss after first 24 weeks of pregnancy

If a colleague suffers pregnancy loss (or their partner suffers pregnancy loss) after the first 24 weeks of pregnancy or if the baby dies shortly following birth, this will be considered a still birth. Under these circumstances, colleagues are entitled to the same statutory and Company primary care giver leave or secondary care giver leave and pay (e.g. maternity leave, paternity leave, shared parental leave, adoption leave), which would otherwise have applied, in accordance with our Primary Care Giver Policy and Secondary Care Giver Policy.

In addition, under these circumstances, in the UK, colleagues may also additionally be entitled to parental bereavement leave (PBL) of up to 2 weeks during the first 56 weeks following the stillbirth. The weeks can be taken in 2 blocks of 1 week taken at different times or in a single block of 2 weeks at anytime in the first 56 weeks after death or stillbirth of child. During the first eight weeks, colleagues need only give notice of their intention to take leave before they are due to start work on the first day of leave. For leave taken in weeks 9 to 56, colleagues need to give at least one week’s notice. Leave can be cancelled or rearranged with the same degree of notice. During PBL you will receive full basic pay. Other locations may also benefit from similar local statutory leave rights.

If more time is needed, especially for those on secondary care giver leave which is typically shorter than primary care giver leave, please speak to your Manager and/or HR Business Partner as PBL may be supplemented with our Compassionate Leave Policy, unpaid leave or using accrued annual leave.

5. SUPPORT AVAILABLE AND RESOURCES

Our ICG Employee Assistance Program (EAP) is available to colleagues for confidential and free support service.

This valuable benefit includes not only include counselling sessions for colleagues and their immediate family but also includes services to help colleagues to manage many aspects of life, including pregnancy loss.

For more information regarding the other benefit provisions in place for you, please go to the HR hub on Connected to view your local benefit guide.

For more information contact Benefits@icgam.com.

There are also a number of external sources of help and support we would like to signpost to colleagues suffering pregnancy loss, which may be a source of help and support including:

- “The Miscarriage Association”, which provides support and information to those affected by miscarriage, ectopic pregnancy or molar pregnancy and offers a pregnancy loss helpline;
- “Sands”, which provides support to anyone who has been affected by stillbirth or neonatal death;
- “Tommy’s”, a charity that carries out research and supports those who have lost babies;
- “The Mariposa Trust”, a charity that provides support to those affected by baby loss and bereavement;
- “Petals”, a charity providing counselling to parents bereaved after pregnancy loss.
- “Antenatal Results and Choices (ARC)”, a charity providing support to those who decide to terminate a pregnancy for medical reasons;
- the “Dad Still Standing” podcast, in which two fathers share their experiences of baby loss and provide advice and guidance to those who reach out to them; and
- “Mind”, which provides support and information to those experiencing mental health issues for any reason.

6. Returning to Work

Managers will keep in touch with colleagues during any period of leave after pregnancy loss to discuss:

- what information, if any, is to be share with other colleagues before they return to work and how that information should be provided;
- any additional support the colleague requires to return to work, such as a phased return/temporary changes to duties, hours or location of work/a period of homeworking/additional breaks; and
- any adjustments recommended by a health and safety risk assessment.

Managers will also have regular meetings with a colleague after their return to work following pregnancy loss so that we can continue to provide adequate support.

6. RESPONSIBILITY AND OBLIGATIONS

Responsibility for the policy

The Executive Directors have overall responsibility for the effective implementation and operation of this policy. All senior Management within the Company are expected to support them in this. This policy is also supported by the Company’s Diversity and Inclusion Champions Group, Wellbeing Champions and HR team.

Individual managers are responsible for ensuring that this policy is applied within their own area. Any queries on the application or interpretation of this policy must be discussed with HR prior to any action being taken.

The HR department holds responsibility for ensuring the maintenance, regular review and updating of this policy.

Revisions, amendments or alterations to the policy can only be implemented following consideration and approval by the Chief People and External Affairs Officer.

Employee obligations

All employees are bound by their contract of employment and ICG Policies, including the ICG Compliance Policies and Procedures throughout the tenure of their employment up to and including their last day of service.

This includes all leaves of absence i.e. annual leave, primary care giver leave, secondary care giver leave, sick leave, sabbaticals and gardening leave.

Failure to follow ICG Policy may result in a Compliance Breach and which be recorded as a Conduct Breach in Workday.