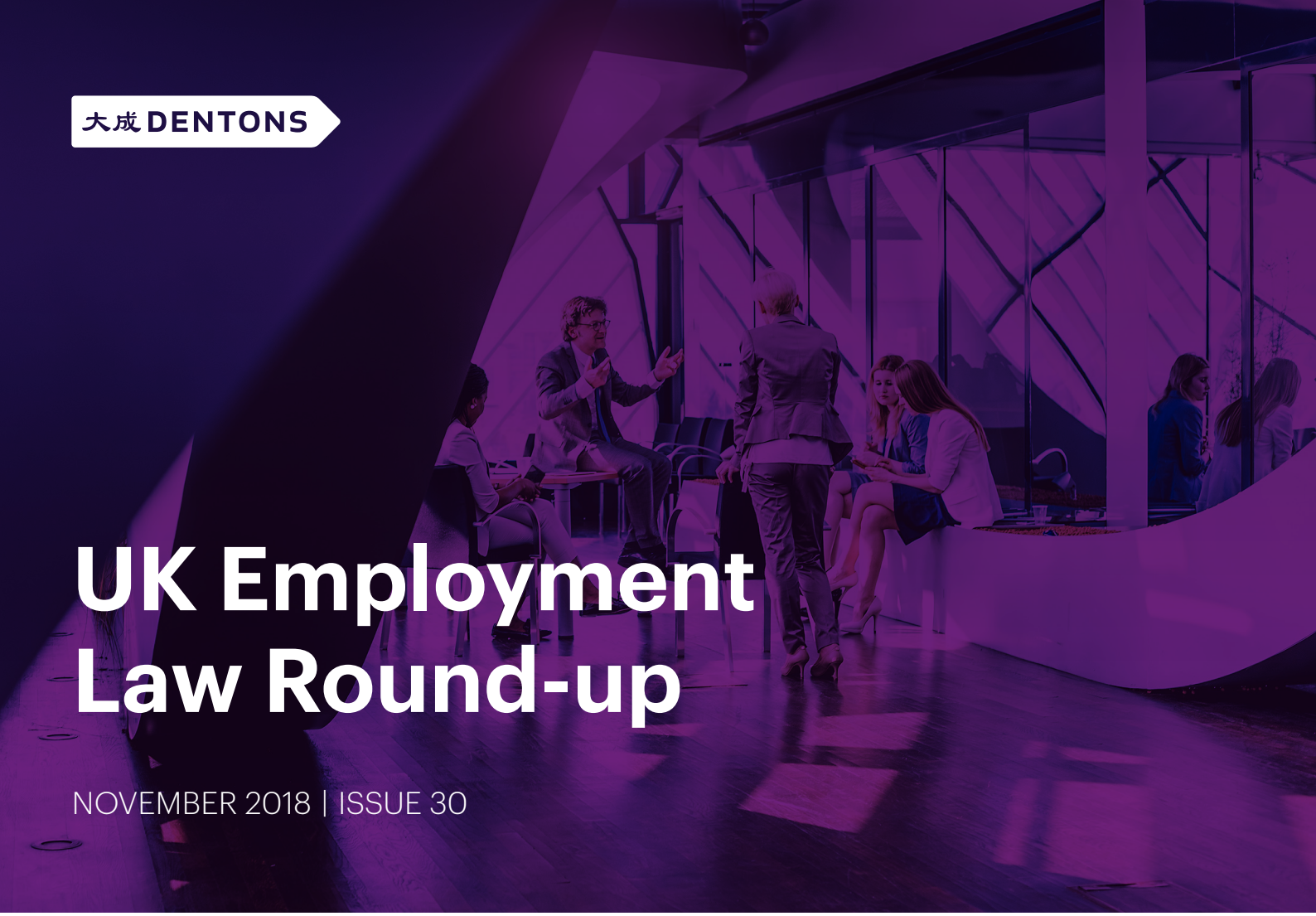
大成 DENTONS



UK Employment Law Round-up

NOVEMBER 2018 | ISSUE 30

In this issue we look at some of the key employment law developments that have been taking place over the past month. In particular, we take a look at two recent holiday pay cases decided by the Court of Justice of the European Union; the possibility that individual employees may be liable for the detriment suffered by whistleblowers; where the line is drawn in instances of work-based name-calling; the case of the part-time flight attendant treated "less favourably" than her full-time colleagues; and finally we consider the lessons that can be learned from the recent case of the Morrisons employee who maliciously published the personal details of 99,000 staff online.

Find out more about our team, read our blog and keep up with the latest developments in UK employment law and best practice at our UK Employment Hub.

IN THIS ISSUE

Holiday headaches!

The right to paid holiday has been the subject of intense judicial scrutiny over recent years. As we approach the festive holiday season, two new cases decided by the Court of Justice of the European Union within the same week illustrate that the issue is not yet settled and shows no signs of abating.

Max-Planck-Gesellschaft v. Shimizu considered the right to payment in lieu of untaken annual leave while the linked cases of Wuppertal v. Bauer and Willmeroth v. Brossonn concerned the right of a deceased worker's heir to receive payment for untaken leave. We have discussed both cases in our blog but the continued focus of the courts prompts us here to provide a brief recap of some key points to remember.

Entitlement to paid annual leave

The Working Time Directive (the Directive) is implemented into UK law by the Working Time Regulations 1998 (WTR). Full-time workers have a basic right to a minimum of 5.6 weeks' paid leave in each year, which is equivalent to 28 days' leave for those who work five days per week. Entitlements are reduced pro rota for part-time employees, and those who join midway through a holiday year.

The UK entitlement actually enhances or "gold plates" European law (because the minimum requirement under the Directive is lower at four weeks). This means that, in the UK, holiday can be broken down as follows:

- four weeks' annual leave derived from the Directive (referred to below as "basic leave"); and
- additional 1.6 weeks' UK enhancement (referred to below as "additional leave").

The distinction is important because, as a general rule, European case law and principles will apply to basic leave but not necessarily the UK's additional leave.

Eagle-eyed readers may also have spotted that the 1.6 weeks' additional leave equates to eight days for full-time employees. This is the same as the number of public holidays each year, although there is no requirement that the leave is used for those days.

Discrimination

Some employers have schemes where holiday entitlement increases alongside length of service. For example, an additional day is awarded for each year of service up to a capped amount. As with all service-based arrangements, an employer must consider whether the arrangement could be indirectly discriminatory on the grounds of age. For example, an increase after 10 years may be indirectly discriminatory because younger employees are statistically less likely to have achieved such long service.

Ordinarily, the onus is then on the employer to show that the provision is objectively justified.
However, there is specific legislation providing that an increase in holiday will not be unlawful age discrimination if:

- the length of service requirement is five years or less; or
- the length of service requirement is more than five years but it reasonably appears to the employer that it "fulfils a business need...for example, by encouraging the loyalty or motivation, or rewarding the experience of some or all of its workers". This is generally considered to be easier to satisfy than the objective justification test.

Similar issues can arise in relation to sex discrimination. For example, length of service requirements may indirectly discriminate against women who are statistically more likely to take career breaks to care for children. Unlike age discrimination, there are no statutory exceptions and so an employer must be able to satisfy the objective justification test. As a rule of thumb, the longer the service requirement, the more likely it is to be discriminatory and the harder it will be to justify.

Separately, problems can crop up in the context of religious holidays. There is no statutory obligation to allow holiday to be taken for reasons relating to religion or belief. However, if permission is refused, then the employer will, again, need to be able to objectively justify that decision. It is a good idea to have a policy in place to help in these circumstances.

Holiday and sick leave

The inter-relationship between holiday and sick leave has proved to be a fertile area for dispute. The case law has resulted in the following principles of note:

- workers are entitled to take holiday during periods of long-term sick leave (but cannot be required to do so by an employer);
- if a worker has pre-booked some holiday but is then sick during that leave, the worker has the right to re-use the holiday at another time (even if this would be after the end of the holiday year); and
- on the face of the WTR, basic leave (i.e. four weeks) can only be taken in the leave year in which it is due, otherwise it is lost. Only additional leave (i.e. the extra 1.6 weeks) may be carried forward. However, case law has determined that if an employee has not been able to take their basic leave because of sick leave, then basic leave must also be allowed to carry over into the next holiday year. There is support for the proposition that, in cases of long-term sick leave, carry-over can be limited so that, if not used within 18 months of the leave year in which it accrued, it will then be lost. However, this is not yet settled beyond doubt.

Other circumstances where holiday must be carried over

In addition, an employee is also entitled to carry over their holiday in the following circumstances:

EDITOR'S TOP PICK OF THE NEWS THIS MONTH

- Addison Lee drivers found to be workers: what can we learn from the latest case on worker status? – http://www.ukemploymenthub.com/addison-lee-drivers-found-to-be-workers-what-can-we-learn-from-the-latest-case-on-worker-status
- Dismissal of pilot with anxiety-related sickness absences held to be procedurally unfair - http://www.ukemploymenthub.com/dismissal-of-pilot-with-anxiety-related-sickness-absences-held-to-be-procedurally-unfair
- Parental bereavement leave and pay: scheme starts to take shape – http://www.ukemploymenthub.com/parental-bereavement-leave-and-pay-scheme-starts-to-take-shape
- Harassment allegations: the catalyst for Google staff walkout – http://www.ukemploymenthub.com/harassment-allegations-the-catalyst-for-google-staff-walkout
- UK gender pension gap at almost 40 per cent – http://www.ukemploymenthub.com/uk-gender-pension-gap-at-almost-40-per-cent

Find out more about our team, read our blog and keep up with the latest developments in UK employment law and best practice at our UK Employment Hub – www.ukemploymenthub.com

- an employer must allow an employee to carry over any basic leave she has been unable to use (because she has been on maternity leave) over to the following year. The case law in question comes from Europe and so strictly it applies only to basic leave. Arguably additional leave need not therefore be carried over, although many employers permit this;
- given that parental leave is taken in small blocks, it is less likely that the issue of leave spanning two holiday years will arise. However, if it does, European case law suggests that basic leave carry-over must be permitted;
- if a worker has been told that leave will be unpaid, their holiday will carry over potentially indefinitely until termination. This is because being told the leave will be unpaid is likely to deter the individual from exercising their right at all. This situation can arise where, for example, the employer believes (incorrectly) that the worker is a genuinely self-employed contractor with no right to paid holiday.

Further comment

We focus above on the entitlement to paid holiday. The question of how pay for that holiday should then be calculated is outside the scope of this article, but no less knotty. You can read our recent People Management article "Are you calculating holiday pay correctly?" here. For help or advice in this complex area, please contact a member of our team.

Individual employees can be liable for a detriment suffered by a whistleblower

In the case of Timis and another v. Osipov [2018] EWCA Civ 2321 the Court of Appeal confirmed that an employee can bring a claim against their co-workers, along with the employer, for being subjected to the detriment of dismissal arising from making a protected disclosure (commonly known as whistleblowing).

Whistleblowing in brief

Under the Employment Rights Act 1996 (ERA) workers have the right not to be subjected to any detriment (including dismissal) on the grounds that they have made a protected disclosure. "Whistleblowing" or "a protected disclosure" are terms used to describe any disclosure of information by a worker which, in the reasonable belief of the worker making the disclosure, is made in the public interest and involves a concern about one or more of the following situations:

- criminal offence;
- breach of any legal obligation;
- miscarriage of justice;
- danger to the health or safety of any individual;
- damage to the environment; and
- the deliberate concealing of information about any of the above.

The disclosure can be made internally (to the worker's employer) or externally to certain prescribed persons (for example, to a regulatory body).

In March 2015, BEIS published Whistleblowing: Guidance for Employers and Code of Practice, which explains an employer's responsibilities with regard to whistleblowers and provides practical guidance on dealing with employees who have made or wish to make a protected disclosure.

Background

Mr Osipov was the CEO of International Petroleum Ltd (the company). During his time as CEO he made a number of disclosures related to corporate governance and compliance with Nigerian law. He was subject to detriment and then dismissed by two non-executive directors of the company, Mr Sage (a non-executive director with managerial functions) and Mr Timis (a non-executive director and the company's largest individual shareholder). Mr Sage acted on instructions from Mr Timis when dismissing Mr Osipov.
Mr Osipov brought a claim to the Employment Tribunal alleging that he had been unfairly dismissed and subjected to detriment for having made protected disclosures. He succeeded with both claims. The Tribunal

held that he was unfairly dismissed by the company under section 103A of the ERA. In addition, the Tribunal held that the directors' conduct in relation to Mr Osipov's dismissal amounted to a detriment contrary to section 47B(1A) of the ERA. This meant that Mr Sage and Mr Timis were both held jointly and severally liable with the company for his losses – which amounted to more than £1.7 million. The company and both directors appealed the decision to the Employment Appeal Tribunal (EAT). The directors argued that, whatever their liability for detriments prior to dismissal, they should not be liable for the losses flowing from the dismissal itself. They were unsuccessful and subsequently appealed to the Court of Appeal.

Court of Appeal decision

The Court of Appeal has upheld the previous decisions of the tribunals and backed the original award made to Mr Osipov. In making the decision the Court considered whether an individual worker can be held liable for a dismissal under section 47B(1A) despite the apparent restriction imposed by section 47B(2), which excludes a detriment claim if the detriment "amounts to dismissal itself".

The Court held that it could not have been the intention of Parliament to exclude liability under section 47B because the same remedy was available under section 103A of the ERA. The Court also pointed out that there is nothing in the wording of the ERA that "excludes from individual liability detriments amounting to termination of the working relationship". In other words, there is no reason for fellow workers to be relieved of liability if they subject another worker to a detriment which results in a dismissal.

Comment

This decision has far-reaching consequences. Individual employees can now be liable for their actions towards whistleblowers, including where these result in a dismissal. In practice this may result in a new trend, where the whistleblowing claims are brought against

both the employer (unfair dismissal claim) and the individual who decided to dismiss the employee (detriment claim).

Employers should also be mindful of the potentially unlimited compensation available to the employees in whistleblowing cases. In particular the usual upper limit for compensation in unfair dismissal claims does not apply to automatically unfair dismissals resulting from a protected disclosure. The employee can also seek an award for injury to feelings in respect of a detriment suffered under section 47B of the ERA.

It is paramount therefore that, in mitigating the risk of such claims, employers are prepared to provide adequate training to the managers and directors investigating and making decisions relating to protected disclosures, and that they have clear whistleblowing policies in place to ensure that the appropriate procedures are followed.

"Fat, ginger pikey" comment was not harassment

In Evans v. Xactly Corporation Ltd UKEATPA/0128/18/LA, the Employment Appeal Tribunal considered whether some rather offensive comments constituted harassment and/or discrimination and held that, on the particular facts of the case, they did not.

Background

Mr Evans had been employed by Xactly as a sales representative for around 11 months before he was dismissed as a result of his poor performance (he had not made any sales during his employment).

Before his dismissal, he was invited to a meeting to discuss a suggested performance improvement plan. This was, however, never put in place because, before the meeting took place, he raised a grievance complaining, amongst other things, that he had been called a "fat, ginger pikey" by one of his colleagues.

He brought various claims including direct discrimination and harassment (on grounds of race and disability), victimisation and discrimination arising out of a disability (on the grounds that his weight was caused by his disability).

Whilst he was not a traveller himself, he had strong links to the traveller community. He also claimed that his weight was caused by his disability (he claimed that he had diabetes and an underactive thyroid and that these had caused him to be overweight). The Respondents accepted that he was disabled on grounds of his diabetes but did not concede, in the absence of medical evidence, that he had an underactive thyroid and/or the effect this had on him.

Decision

Mr Evans' claims all failed on the facts and it was held that there was no harassment or discriminatory treatment – Mr Evans had been dismissed as a result of his poor performance (as had others who had not performed to the required standard).

There were some important facts which led to this conclusion:

1. The office culture was one where banter (including "jibing and teasing") was considered the norm. No one sought to offend and no one was found to be offended. Of particular importance was that Mr Evans himself participated in the banter, using the "C word" in the workplace and regularly referring to one of his colleagues as "fat Paddy" – which showed that the

conversations were "indiscriminately inappropriate" irrespective of any protected characteristics. Mr Evans had even been spoken to in respect of his own behaviour after one of his female colleagues had complained about him calling her "pudding" and always trying to hug her (which the Tribunal said was potentially a lot worse because it involved unwanted touching).

2. The person who made the "fat, ginger pikey" comment did not know Mr Evans had links to the traveller community and none of his colleagues (other than himself) considered him to be fat. Mr Evans was also unable to provide sufficient evidence that his medical conditions caused him to put on weight.
3. Mr Evans was also found not to have been offended by the comment. He was very friendly with the person who had made the comment (both before and after it was made) and it took him around two months to complain about it. The Tribunal accepted that, had Mr Evans been offended by the comment, he would have complained about it there and then. The Tribunal even commented that it was likely Mr Evans had only raised this as an issue to try to avoid any eventual disciplinary action and/or negotiate an exit package.

Comment

Without delving into the facts of the case it may seem odd that the comment "fat, ginger pikey" was held not to amount to harassment, especially when Mr Evans had links to the traveller community.

The decision highlights the importance of the factual matrix in harassment claims and it is clear that, in other circumstances, the comment may well have fallen within the definition of harassment. Had there been a different culture and had Mr Evans not participated in any banter, then the case could well have been decided differently.

Lessons to learn from the case include ensuring you have clear policies and provide training on what will constitute inappropriate behaviour and that you take disciplinary action when those standards are not adhered to. Don't leave things to fester so that unacceptable behaviour becomes acceptable.

Of particular interest is that part of Mr Evans' claim stemmed from his colleague having referred to him as a "fat, ginger pikey". This is significant because whilst there is, on the face of it, nothing discriminatory about calling someone "fat", had Mr Evans been able to link his weight to a disability, his claim may well have succeeded. So a seemingly innocuous (although nevertheless pretty nasty) comment about someone's weight could potentially be held to be discriminatory in future.

Court of Appeal rules on part-time cabin crew's alleged less favourable treatment

In the recent case of British Airways plc v. Pinaud, the Court of Appeal had to decide whether a part-time worker who was required to be available for proportionally more days than her full-time comparator was treated less favourably, contrary to the Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000.

IN THE PRESS

In addition to this month's news, please do look at publications we have contributed to:

- People Management – Victoria Albon and Kate Coppack report on what should be taken into account when it comes to holiday pay.
- Scottish Grocer – Mark Hamilton reports on the law regarding rest breaks.
- People Management – Jessica Pattinson reports on workforce planning in the face of Brexit uncertainty.

If you have an idea of a topic you'd like us to cover in a future round-up or seminar, please provide your comments here.

Background

Under Regulation 5 of the Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000 (PTWR), a part-time worker has the right not to be treated less favourably than a comparable full-time worker. This includes in regard to contract terms (such as pay, holiday allowance etc.) or by being subjected to any other detriment by any act, or deliberate failure to act, by their employer.

In determining whether a part-time worker has been treated less favourably, a Tribunal will apply the pro rata principle i.e., where a comparable full-time worker is in receipt of pay or any other benefit, a part-time worker should not receive less than the proportion of that pay or other benefit than the amount of weekly hours they work in comparison to their full time comparator.

An employer is, however, able to justify less favourable treatment if it can demonstrate that the treatment is a necessary and appropriate way of achieving a legitimate objective.

Facts

Ms Pinaud was employed as a part-time cabin crew purser by British Airways (BA). Her shift pattern was such that she was on duty for 14 days and off duty for 14 days. In the 14-day "on duty" period she had to be available for work for 10 of the days, and was therefore available 130 days per year. Her full time-time comparator worked six days on and three days off and had to be available 243 days per year. This meant that Ms Pinaud was available for 53.5 per cent of a comparable full-time worker's hours but received only 50 per cent of the salary.

In 2015, shortly after taking voluntary redundancy, Ms Pinaud brought a grievance alleging she had suffered less favourable treatment. This grievance was rejected and Ms Pinaud subsequently brought a claim under the PTWR.

The Employment Tribunal

The Tribunal in the first instance upheld Ms Pinaud's claim. The Tribunal found that, although there was a legitimate objective in the part-time shift pattern, the treatment could not be justified as it was not a necessary or appropriate means of achieving the objective. In arriving at its conclusion, the Tribunal suggested that discrimination could have been avoided if Ms Pinaud had just been paid 53.5 per cent of a full-time salary.

BA argued that the statistics showed that Ms Pinaud, although "on duty" for proportionally more time, actually worked fewer days pro rata than her full-time comparator. The Tribunal dismissed the statistics as irrelevant to the issue of liability. BA appealed to the EAT.

The EAT

The EAT held that, while less favourable treatment had occurred, the Tribunal in the first instance had failed to assess the practical impact of the treatment when deciding if it was objectively justified. BA's argument that Ms Pinaud worked fewer hours than her comparator needed to be addressed and the EAT remitted the case back to the Tribunal to consider this point further. BA, however, appealed the less favourable treatment limb of the decision.

The Court of Appeal

The Court of Appeal agreed with the EAT in that less favourable treatment had occurred and dismissed BA's appeal. It held that any arguments as to the advantages of Ms Pinaud's part-time contract (i.e. the fact that she worked proportionally fewer hours) were relevant only to justification. The issue of justification is now to be considered by a freshly convened Tribunal on remittal.

Comment

While the decision of the Court of Appeal does not come as a great surprise given the fact that Ms Pinaud was paid less but required to be available for proportionally more time than her full-time comparator, BA may still be able to defend the claim if it can convince the Tribunal that Ms Pinaud's shift pattern was not detrimental to her.

This is a test case and very important to BA as there are 628 similar Tribunal claims which have been stayed pending the outcome of this appeal. If Ms Pinaud's claim is upheld it is possible that she will receive 3.5 per cent of her salary and further pension contributions for the 10 years she worked part-time.

Although fact-specific, this case serves as a good reminder that employers should examine the hours worked by and salary paid to part-time employees and ensure, to the greatest extent possible, that there is consistency in the treatment with their full-time

counterparts. If this cannot be done, employers will need to show they have a legitimate business aim for the difference in treatment and that they can objectively justify any difference in treatment to avoid the risk of successful claims under the PTWR.

The insider threat and data protection

If we were to hazard a guess at what furrows the brows of Data Protection Officers (DPOs) when considering data breach risk, following the Court of Appeal's judgment in WM Morrison Supermarkets Plc v. Various Claimants [2018] EWCA Civ 2339, the "insider threat" should be at the forefront of our minds.

Below, we offer our views on the Morrisons case and some practical tips on how to mitigate these risks.

The Morrisons litigation

The case concerned the actions of a disgruntled employee who published the details of more than 99,000 staff on a file-sharing website. He then sent a copy of the file to three newspapers. More than 5,500 staff commenced claims for damages. They also claimed that Morrisons was vicariously liable.

If you had only read the hyperbolic media coverage emerging from the Court of Appeal decision, you could be forgiven for thinking that the judgment was surprising or unusual. Whilst it may seem surprising that Morrisons should be held liable for an employee's conduct, which also amounted to a criminal offence, the legal principles in this area are designed around giving a claimant or claimants (in this case, a class of data subjects) an adequate remedy.

In a nutshell, the judgment reinforces the scope of the principle of vicarious liability under English common law. Since the Supreme Court's decision two years earlier in Mohamud v. WM Morrison Supermarkets plc [2016] AC 667, the approach has been to draw lines very broadly around the "field of activities" with which the employee is entrusted. In determining the closeness of connection between the wrongful conduct and this field of activities, the Courts are leaning towards principles of social justice which favour a payout for a claimant or claimants from the (presumably insured) defendant employer. The availability of insurance for the defendant is, as the Court of Appeal sees it at paragraph 78 of its judgment: "a valid answer to the Doomsday or Armageddon arguments put forward...on behalf of Morrisons".

Thus, in the Morrisons decision, the Court of Appeal: (1) reiterated the core principles of vicarious liability; (2) dismissed arguments to the effect that making a finding would impose an onerous burden not only on Morrisons but on future employers in the same position; and (3) followed through from the findings of fact in the High Court that there was an "unbroken chain" of events between Mr Skelton's employment and his wrongful conduct – to find Morrisons vicariously liable for his actions.

What types of claim?

The compensation claim in Morrisons is founded on three heads of claim: (1) a breach of statutory duty under the Data Protection Act 1998 (DPA 1998), leading to a claim under s13 DPA 1998; (2) a claim under the tort of

misuse of private information; and (3) an equitable claim for breach of confidence.

Incidentally, the first and second grounds of appeal in the Court of Appeal dealt with the argument that claims (2) and (3) above were excluded by the DPA 1998. This argument failed on the particular interpretation of the statute, but the door is open to the argument being run again in a post-GDPR landscape.

Technically speaking, the heads of claim listed above are Mr Skelton's breaches, for which Morrisons is held vicariously liable.

To recap: in the High Court decision ([2017] EWHC 3113(QB)), Mr Justice Langstaff determined that Morrisons itself had not breached the DPA 1998 (save for one minor breach of Principle 7 of the Data Protection Principles (i.e. Security) which did not lead, causally, to any loss as there was no evidence that it would have prevented Mr Skelton's criminal misuse of the data). The High Court furthermore decided that Mr Skelton, in fact, became the controller of the data at the relevant moment when he was carrying out his wrongful actions.

For DPOs, it will seem counterintuitive that, although Mr Skelton was the (separate) data controller and therefore completely in charge of deciding the purposes and means of data processing i.e. what he did with the data, the doctrine of vicarious liability still fixes his employer, Morrisons, with liability for his actions. Nevertheless, this is the conclusion to which the Morrisons case leads us.

On the other hand, this situation would not have arisen if Mr Skelton had been an external cyberhacker, leading to a curious situation where data subjects will actually be more readily able to claim compensation for their losses from an organisation where the data breach is an "inside" job, as compared to an "outside" job.

Data breach litigation and the General Data Protection Regulation (GDPR)

If the Morrisons data breach had occurred today, it would be litigated under the GDPR and local Member State laws – in particular, the right to claim compensation for material or non-material damage (Article 82) and the new provisions around group representative actions (Article 80).

Under the GDPR, there are two particular further points of note:

- Article 29 GDPR: the processor and any person acting under the authority of the controller or of the processor, who has access to personal data, shall not process those data except on instructions from the controller, unless required to do so by Union or Member State law.
- Article 32(4) GDPR: the controller and processor shall take steps to ensure that any natural person acting under the authority of the controller or the processor who has access to personal data does not process them except on instructions from the controller, unless he or she is required to do so by Union or Member State law.

Could there be an argument run that Article 29 GDPR excludes the possibility of vicarious liability because it specifically instructs "any person acting under the authority" not to process the data except on instructions from the controller? Furthermore, that Article 32(4) was designed to create a specific (and limited) duty for the actions of employees, thus excluding the doctrine of vicarious liability under English common law?

Practical steps

Here are a few steps to help manage the risk:

- Monitoring – consider whether current employee monitoring is adequate and deploy Data Loss Prevention software.
- Repositories – use designated repositories to hold HR and other personal data.
- Data mapping – this should have formed part of your GDPR compliance programme and perhaps forms part of your Article 30 records. If your organisation is not aware of where data is held (e.g. in which repositories) and under which security measures, how much harder will it be to prevent a data breach of this nature?
- Robust information security framework – this should include not only organisational measures (e.g. having policies in place which outline expectations of employee conduct around IT) but also technical measures (e.g. data loss prevention software, the

encryption and password protection of data and the imposition of roles-based permissions and access controls).

- Training and awareness – this should also have formed part of your GDPR compliance programme, but should be regularly reinforced, particularly in order to mitigate the risks of "insider threat".

Data breach – inevitably, there will be little that can be done to deter the most determined malicious insider. Therefore, in the event of a data breach, you should have procedures (which have been tested via a data breach simulation exercise) in place. Ensuring that there is good communication and clear escalation lines may mean the difference between unauthorised access and a large-scale leaking of data onto the Dark Web, if caught early enough. Furthermore, there is a need to act quickly, as under GDPR it is now necessary for data controllers to consider whether notification will be required within 72 hours of the controller "becoming aware" of a data breach.

Dentons is the world's largest law firm, delivering quality and value to clients around the globe. Dentons is a leader on the Acritas Global Elite Brand Index, a BTI Client Service 30 Award winner and recognized by prominent business and legal publications for its innovations in client service, including founding Nextlaw Labs and the Nextlaw Global Referral Network. Dentons' polycentric approach and world-class talent challenge the status quo to advance client interests in the communities in which we live and work.

www.dentons.com

Contacts

Virginia Allen
Head of People, Reward and Mobility UK
D +44 20 7246 7659
virginia.allen@dentons.com

Sarah Beeby
Partner
D +44 20 7320 4096
sarah.beeby@dentons.com

Ryan Carthew
Partner
D +44 20 7320 6132
ryan.carthew@dentons.com

Mark Hamilton
Partner
D +44 14 1271 5721
mark.hamilton@dentons.com

Jessica Pattinson
Head of Immigration
+44 20 7246 7518
jessica.pattinson@dentons.com

Brand-12900-UKEmploymentLawRound-Up-November2018–26/11/2018