

1. Policy Statement

Urbaser is fully committed to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to the Company.

The Company will not discriminate because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. It will not discriminate because of any other irrelevant factor and will build a culture that values meritocracy, openness, fairness and transparency.

All employees are responsible for the promotion and advancement of this policy. Behaviour, actions or words that transgress the policy will not be tolerated and will be dealt with in line with the Company's disciplinary policy.

Objectives relating to fair and inclusive practices will be included in all employees' performance indicators and will form an integral part of performance reviews throughout the year.

The policy is applicable to all employees, clients, communities, suppliers and contractors, whether permanent or temporary. The policy applies to all processes relating to employment and training and to any dealings with customers and clients. Decisions relating to customers and communities will be based on business-related criteria only and any irrelevant information will not form part of the process.

The policy will be reviewed on an ongoing basis to reflect changes in the law, demographics and internal business requirements. Progress relating to the policy will be recorded annually and a full report will be presented to the senior management team to debate progress and review the policy status.

This policy is aligned with our core values Safety, Care, Teamwork and Respect.

Consistent with our values, Managers should behave:

- Professionally and courteously
- Sensitively and sympathetically
- Consistently and fairly
- In a just and equitable manner
- With dignity and respect

Our commitment:

- to create a culture in which diversity and equality of opportunity are actively promoted and in which discrimination is not tolerated;
- to treat all potential, established and temporary employees (including agency workers and contractors) and customers fairly and without discrimination regardless of their employment status, gender, race, colour, nationality, ethnic or national origin, religion or religious or philosophical belief, age, marital status or civil partnership status, sexual orientation, disability, membership or non-membership of a Trade Union;

Urbaser Ltd: Equality and Diversity Policy

- to provide training, development and progression opportunities to all employees to make the most of their abilities and potential;
- to recognise the varied contributions to the achievement of Urbaser Ltd's goals made by employees from diverse backgrounds with a wide range of experiences;
- to address the inequalities and barriers faced by people in under-represented groups and by valuing, learning and benefiting from the diverse cultures of our society and employees;
- to ensure all employment policies and practices are fair and equitable and without bias;
- to regard any breaches of the Equality and Diversity Policy as misconduct which could therefore lead to disciplinary action;
- to monitor and review the Equality and Diversity Policy on an annual basis and consult with employees on any changes required;
- to understand our customer profile and deliver services which reflect the specific needs of all our customers, including those who are elderly, vulnerable, disabled or from Black and Minority Ethnic (BME) groups, or socially excluded/harder to reach groups, in ways which promote equality and inclusiveness;
- to actively consult with different individuals, communities and internal and external partners to ensure we deliver services which reflect the specific needs of all our customers;
- to ensure customers know what our services are and how to access them; and
- to have a diverse workforce that reflects the local population.

2. Purpose

The purpose of this policy is to ensure that in carrying out its activities Urbaser Ltd will:

- promote equality of opportunity across all the activities of Urbaser;
- promote good relations between people of a diverse background;
- eliminate unlawful discrimination.

3. Underlying Principles

The policy is guided by the following principles:

- all potential, established and temporary employees including agency workers, contractors, and customers enjoy a safe environment free from discrimination;
- all employees have equal access to opportunities for personal and professional development as well as career, progression and promotion opportunities;
- all employees are able to participate fully in their work and life of Urbaser Ltd and celebrate our diversity;
- employees at Urbaser Ltd should reflect the diversity of talent, experience and skills from the local, national and international pool from which we draw our workforce;
- positive action initiatives will be used to redress inequalities and discriminatory practice;
- all employees are entitled to expect equality of opportunity in all aspects of their employment including its terms and conditions;
- all potential employees are entitled to expect the recruitment process to be free of all unreasonable barriers;

- recognise that different communities and neighbourhoods have different needs and our aim is to treat everyone fairly;
- ensure equality of service for all customers.

4. Scope

This policy applies to all potential, established and temporary employees including contractors, and any other individual working at or visiting Urbaser premises as well as customers.

This policy applies to all aspects of the employment relationship including termination of employment and references. Furthermore the policy applies to all aspects of service design and service delivery to our customers.

Urbaser will have due regard of the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out our activities.

5. Responsibility

Every employee has responsibility to abide by the Equality and Diversity Policy. Individual members of staff, as well as Urbaser Ltd, can be liable on an individual basis for discrimination.

Urbaser Ltd is responsible for meeting its legal obligations in respect of legislation relating to equal opportunities.

The Directors of Urbaser Ltd have ultimate responsibility for this Policy.

Human Resources (HR) has the responsibility for the strategic development, monitoring and review of the Equality and Diversity Policy. Business Development are responsible for ensuring that service design fosters equality of service for all customers. Revisions, amendments or alterations to the policy can only be implemented following consultation and approval by the Directors of Urbaser Ltd.

Every Line Manager / Supervisor is responsible for:

- fostering a culture in which compliance with this policy is regarded as integral to the work of the area and in which equality and diversity issues are actively promoted;
- dealing with any areas of discrimination by taking prompt action to resolve complaints and prevent future recurrence;
- ensuring employees are encouraged, supported and enabled to reach their full potential.

Every employee is responsible for:

- supporting and implementing the aims of this policy in all of their work activities;
- promoting equality of opportunity;
- contributing to an environment free of fear or intimidation and which celebrates diversity;
- ensuring their behaviour and actions do not amount to discrimination, in any way.

The Company will:

- identify a senior level champion for leading the diversity strategy;
- secure top-level ownership and sponsorship for the programme; and
- develop and cascade a diversity vision statement.

6. Communication and consultation

The Company will:

- establish key lines of communication across the business through consultation with key stakeholders;
- undertake an audit of existing communications channels so that compliance and inclusiveness are assured;
- ensure that communication imagery and graphics are inclusive, and reflect and reinforce the words within the documentation;
- distribute a top-level communications plan to senior management for team briefings, and develop "reporting back" communication lines to ensure feedback; and
- ensure that mainstream business communications reinforce the inclusive messages and become mainstreamed into day-to-day processes.

7. Training and Development

All employees will have access to training and development opportunities.

The selection criteria used to access training and development opportunities must not discriminate unlawfully.

Line Managers / Supervisors must conduct the annual performance, development and career review using objective and justifiable criteria and in a way that does not unlawfully discriminate.

Employees will have their performance assessed consistently and objectively over a period of time against relevant and agreed targets which are not discriminatory.

The Company will:

- conduct a full training needs analysis relating to the understanding and management of diversity;
- consult key stakeholders and players on the organisational learning requirements;
- evaluate suppliers' training and secure budget for training design and delivery;
- integrate diversity into mainstream learning and development programmes;
- establish education programmes for all staff (including programmes that move from awareness to behavioural change); and
- integrate diversity competencies into development programmes and assessment and selection processes.

8. Monitoring, measurement and review

Urbaser Ltd will monitor its composition and the effects of its recruitment practices. Monitoring will involve gathering individual personal information on the diversity of potential recruits and existing employees to compare and analyse against employees in Urbaser Ltd, job seekers in the local community and the broader national labour market.

Recruitment and other employment decisions will be monitored and reviewed and where necessary, will be changed to ensure that everyone is treated fairly.

Urbaser Ltd will monitor and review its policies and procedures to ensure that real improvements are being made in tackling discrimination and promoting diversity.

Urbaser Ltd will share information on its achievements and areas for further improvement, by making public the results of the impact assessments, the hard data obtained and the actions taken to address the issues identified.

The Equality and Diversity Policy will be reviewed on an annual basis or more frequently if required by the HR Manager, Business Development Manager and Directors.

The Company will:

- capture all available workforce metrics from existing databases to benchmark against sector companies, demographics and best practice standards;
- agree the aspirational targets for the workforce composition over a five-year period with the managing director, the board and the diversity steering council;
- establish formal measurement tools to assess the climate in the Company (for example regular staff surveys and 360° feedback mechanisms);
- develop relationships with external benchmarking bodies to assess progress (with, for example, Race for Opportunity, Opportunity Now, the Employers Forum on Age and the Equality and Human Rights Commission); and
- consult and communicate with our customers where changes to service delivery is anticipated.

9. Auditing

The Company will:

- undertake a full audit in relation to policies and procedures, practice of policy and perception of policy and process;
- obtain workforce metrics and compare them with sector and best practice organisations; and
- produce a risk analysis report for senior board members to act as a catalyst for future activity across the business.

The audit will include a review of all the processes to establish the Company's position with regard to compliance and best practice. This will be done by administering a questionnaire to all staff, undertaking one-to-one interviews with key leaders and stakeholders, and facilitating focus groups to establish employees' perception in relation to key areas of the questionnaire.

10. Resources

The Company will:

- establish formal reporting lines for monitoring progress against targets and objectives;
- identify and appoint functional diversity champions to report progress to the leadership team on a quarterly basis; and
- secure financial sign-off from the managing director to enable related activities to be undertaken..

11. Recruitment and selection

All employees will be provided with the Equality and Diversity Policy as part of their induction.

All Line Managers / Supervisors involved in recruitment, selection or interviewing shall be trained to ensure that appointments are made on an objective and justifiable basis.

All recruitment and selection criteria must be objective and justifiable and must not discriminate unlawfully. Urbaser Ltd will ensure no unreasonable discrimination against any individual in the benefits, terms and conditions, both contractual and implied, within which employment is offered and provided.

All promotion opportunities will be advertised.

All criteria used in making decisions for promotion or transfer will be objective, justifiable and will not discriminate unlawfully.

The company has a separate Recruitment and Selection Policy which is aligned to this policy and addresses equality and diversity.

12. External profile

The Company will:

- join appropriate organisations in order to network, exchange best practice and generally raise the Company's profile;
- build relationships with trade, and the local and national press to develop a good external image and to position the Company at the leading edge.

13. Policy development

The Company will:

- benchmark existing policy statements from other organisations and advisory groups;
- develop human resources and other policies (outlining vision, scope, responsibility, accountability and measurements); and
- cascade new policies with managing director endorsement through business briefings.

14. Disability

Urbaser Ltd will make such adjustments to work arrangements and to its premises as are reasonable to enable an employee with a disability to carry out their duties. This will include, but is not limited to, consideration of the provision of specialist equipment, job redesign, retraining and flexible hours.

Urbaser will also ensure that the service provision offered to our customers does not negatively preclude them from participating in the service and will make reasonable adjustments such as providing an assisted collection for those less able to present their containment at the curtilage of their property.

Urbaser Ltd recognises the importance of taking pro-active measures to remove barriers from the working environment for people with disabilities. This will benefit not only those employees but also in many cases visitors and employees who have temporary impairments (e.g.: a broken leg).

Where during the course of employment an employee with a disability recognises the need for a reasonable adjustment to be made to their work arrangements or Urbaser Ltd premises, they should discuss this requirement with their Line Manager / Supervisors. The expertise of the employee concerning their own disability will be recognised.

Where Urbaser Ltd does not have the relevant expertise to resolve the problem, an outside specialist may be consulted. Once an adjustment has been made its operation may need to be reviewed at agreed intervals to assess its continuing effectiveness.

15. Breach of the Policy

Urbaser Ltd will take seriously any instances of failure to meet the requirements of this policy. Any breach or suspected breach of this policy will be dealt with in accordance with the Urbaser Ltd's Disciplinary Procedure and may result in disciplinary action including dismissal.

With regard to any breach of the policy by visitors, third parties, and customers Urbaser Ltd will take appropriate action in relation to the nature of the incident.

While all employees are protected in making good faith complaints of a suspected breach, it must also be noted that any employee who raises a complaint, which upon investigation is proven to be deliberately vexatious (with the aim of causing trouble of others) and without substance, they will themselves become the subject of disciplinary proceedings up to and including dismissal.

Any retaliation against an employee who has made a complaint of discrimination or unfair treatment can be expected to lead to disciplinary action.

16. Raising a complaint

Employees

All complaints of discrimination and unfair treatment will be handled sensitively in a timely and confidential manner and the matter will be promptly and fully investigated.

If an employee believes they have experienced any kind of discrimination or unfair treatment, they should raise the matter initially with the person who behaved in this way, asking them to stop.

Urbaser Ltd: Equality and Diversity Policy

If the issue is unresolved the employee should then raise the matter with their Line Manager / Supervisors and pursue it through the Grievance Procedure.

If the complaint is of a sensitive nature and it is not appropriate to raise it in the first instance with the Line Manager / Supervisor (e.g. if the Line Manager / Supervisor is the subject of your complaint), then a direct approach may be made to the HR Manager.

Where a formal Grievance is made, all steps will be taken to maintain confidentiality as far as is consistent with progressing the complaint in this manner. Urbaser Ltd may have to consider relocating employees should it be considered necessary.

All Grievances raised under the Equality and Diversity Policy will be reported to the HR Manager.

Visitors, third parties and Customers

All complaints of discrimination and unfair treatment will be handled sensitively in a timely and confidential manner and the matter will be promptly and fully investigated.

If a visitor, third party or customer believes they have experienced any kind of discrimination or unfair treatment, they should e-mail enquiries@urbaser.co.uk. The information will be passed onto the HR Manager who will undertake a full and thorough investigation into the matter.

17. Equality and the Law

Equality Act 2010

Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 (SI 2011/1064)

Equality Act 2010 (Specific Duties) Regulations 2011 (SI 2011/2260)

Special Educational Needs and Disability Act 2001

Protection from Harassment Act 1997

Employment Rights Act 1996

Employment Relations Act 1999

Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000 (SI 2000/1551)

The Equality Act 2010 defines direct discrimination as less favourable treatment because of a protected characteristic. The protected characteristics under the Equality Act 2010 are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

Indirect discrimination against individuals because they have a relevant protected characteristic is also covered, although pregnancy and maternity does not come under the indirect discrimination provisions in the Equality Act 2010.

18. Unlawful Discrimination

It is unlawful to:

- Harass, intimidate or otherwise subject others to unfavourable treatment on any of the 'protected characteristics' (e.g. employment status, gender, race, colour, nationality, ethnic or national origin, religion or religious or philosophical belief, age, marital status or civil partnership status, sexual orientation, disability, membership or non-membership of a Trade Union).
- Discriminate on the ground of someone's association to someone else who has one of the 'protected characteristics'.
- Discriminate against someone because they are thought to have one of the 'protected characteristics'.
- Instruct another person to discriminate unlawfully and to act in response to such instructions.
- Put pressure on another person to discriminate unlawfully and to act in response to such pressure.
- Segregate by making separate arrangements for persons of different groups.
- Victimise individuals who have made or assisted in allegations or complaints of unlawful discrimination and / or provided such information about such discrimination.

Victimisation could simply be disadvantaging the individual by giving them the least pleasant jobs, or passing them over for promotion or training opportunities.