


	<b>Equality and Diversity Policy</b>		HO-HR-PL-005
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### CONTENTS

- |   |                             |
|---|-----------------------------|
| 1. Policy Statement                             | 13. Monitoring and Review   |
| 2. Purpose                                      | 14. Education and Training  |
| 3. Underlying Principles                        | 15. Equality and the Law    |
| 4. Scope  | 16. Unlawful Discrimination |
| 5. Responsibility                               |                             |
| 6. Recruitment and Selection                    |                             |
| 7. Training and Development                     |                             |
| 8. Promotion and Transfer                       |                             |
| 9. Benefits, Terms and Conditions of Employment |                             |
| 10. Disability                                  |                             |
| 11. Breach of the Policy                        |                             |
| 12. Raising a Complaint                         |                             |

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## 1. Policy Statement

It is the policy of Urbaser Ltd to encourage, value and manage diversity and ensure equality of opportunity for all employees.

Urbaser regards this policy as a commitment to make full use of the talents and resources of all employees and to provide a healthy environment in which to encourage good and productive working relations within Urbaser.

It is Urbaser Ltd's policy that no employee or prospective employee will receive less favourable treatment or will be disadvantaged by any circumstances, conditions or requirements that cannot be justified.

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) 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;
- 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.

## 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 and contractors, 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.

#### 4. Scope

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

This policy applies to all aspects of the employment relationship including termination of employment and references.

#### 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. 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.

### 6. Recruitment and Selection

All recruitment and selection criteria must be objective and justifiable and must not discriminate unlawfully.

All recruitment opportunities will be advertised internally.

No advertisement will be published that indicates, or could reasonably be understood to indicate an intention to discriminate against applicants on the grounds 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.

All applications must be processed in the same way and only those applicants who match the selection criteria will be shortlisted.

All recruitment and selection decisions must be objectively and justifiably explained.

No job applicant will be discriminated unlawfully in the terms on which the employment is offered.

No job applicant will be discriminated unlawfully by being refused or deliberately omitted employment on any of the protected grounds.

A disability will not itself justify the non-recruitment of an applicant for a position at Urbaser Ltd. Such reasonable adjustments to the application procedure shall be made as are required to ensure that applicants are not disadvantaged because of their disability. For example, where written tests are used, alternative arrangements will be made for visually impaired applicants.

Before an applicant is judged because of a reason related to their disability to have failed to meet the requirements of a job description and person specification, or to have been less suitable than other applicants, full consideration will be given to whether a reasonable adjustment can be made which will counteract this disadvantage.

### 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.

### 8. Promotion and Transfer

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.

### 9. Benefits, Terms and Conditions of Employment

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.

### 10. Disability

Urbaser Ltd will make such adjustments to work arrangements 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 hou

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.

### 11. 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 or third parties, 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.

### 12. Raising a Complaint

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.

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.

### 13. Monitoring 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 by the HR Manager.

### 14. Education and Training

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

Line Manager / Supervisors will receive additional training in dealing with any equality and diversity issues.

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.

### 15. Equality and the Law

There are several laws relating to Equal Opportunities and Discrimination. The main ones in force are:

- The Equal Pay Act 1970.
- The Sex Discrimination Act 1975 (as amended).
- The Race Relations Act 1976 (as amended).
- The Disability Discrimination Act 1995 (as amended).
- Employment Rights Act 1996.
- Employment Act 2002.
- The Employment Equality (Religion or Belief) Regulations 2003.
- The Employment Equality (Sexual Orientation) Regulations 2003.
- The Employment Equality (Age) Regulations 2006.
- The Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000.
- The Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- Protection from Harassment Act 1997.
- Equality Act 2010 (comes into force October 2010).

### 16. 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.