

Corporate Social Responsibility

Equalities, Human Rights and Modern Slavery Policy

INTRODUCTION

We deliver resource management services to and on behalf of Fife Council, as well as a wide number of 3rd parties across Scotland and further afield. Our mission, as two companies with one shared purpose, is to deliver best value sustainable waste and resource management services on behalf of Fife Council and to make Fife the resource management hub for Scotland. In doing this we recognise the impact our actions and those of our suppliers, customers, partners and other stakeholders on the environment and wider society and strive to make this impact a positive one.

PURPOSE

This document is FRS/Cireco Scotland's Corporate Equalities, Human Rights & Modern Slavery Policy. Our Equality, Human Rights & Modern Slavery Policy applies to all FRS/Cireco staff, as well as those of our contractors, across all our activities. We also expect our suppliers to respect and adhere to this policy, as part of our Third-Party Code of Conduct.

FRS/Cireco recognise the responsibility we have over the actions of our organisation and its place within the local and wider economy. Our duty of care in this regard extends beyond our own workforce and our direct practices and covers those we work with and contract with. Our Equalities, Human Rights, Modern Slavery Policy covers the conduct standards we hold ourselves to, and also those we require of our wider family of stakeholders and partners.

PRINCIPLES

We will:

- seek to avoid causing or contributing to adverse equalities & human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner;
- seek to prevent or mitigate adverse equalities & human rights impacts that are directly related to our activities and services through our stakeholder relationships;
- provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse equalities & human rights impacts;
- continue to look for ways to support the promotion of equalities & human rights within our organisations and our sphere of influence.

POLICY

The Equality Act 2010 sets out the public sector general equality duty requiring public authorities to pay due regard to the need to eliminate unlawful discrimination, victimisation and harassment; advance equality of opportunity; and foster good relations. These requirements apply across the protected characteristics of age, disability, gender reassignment, pregnancy and maternity, race, religion and belief, sex, sexual orientation, and marriage and civil partnership. As an ALEO (Arm's Length External Organisation) of Fife Council FRS/Cireco adhere to the same principles and requirements.

Internal Context

Public Sector Equality Duty

Section 149 of the Equality Act 2010 came into force in April 2011, introducing a new Public Sector Equality Duty that became law across Scotland. The public sector equality duty has 3 parts which all public authorities need to comply with, and as an ALEO so does FRS/Cireco.

The 3 parts are called the general duty and public authorities need to consider each of these:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between those who have a protected characteristic and those who do not
- Foster good relations between those who have protected characteristics and those who do not

Beyond the wider General Equality Duty the Public Sector Equality Duty ensures that public authorities and those carrying out a public function, such as FRS, consider how they can positively contribute to a more equal society through advancing equality and good relations in their day-to-day business, to:

- take effective action on equality;
- make the right decisions, first time around;
- develop better policies and practices, based on evidence;
- be more transparent, accessible and accountable; and
- deliver improved outcomes for all.

These duties apply to protected characteristics under the Equality Act which are:

Age

Disability

Gender reassignment

Marriage and civil partnership

Pregnancy and maternity

Race – this includes ethnic or national origin, colour and nationality. This includes Gypsy Travellers

Religion or belief – this includes lack of belief

Sex

Sexual orientation

Equality & Diversity in Employment

FRS/Cireco is committed to providing equality of opportunity in employment. We aim to ensure a fair, open and transparent approach to the determination of pay and conditions of employment which does not discriminate unlawfully and is free from bias across all of the protected characteristics including sex, race and disability.

We believe that all employees should receive equal pay for the same or broadly similar work, for work rated as equivalent, or for work of equal value.

We will:

- Use a robust framework of job evaluation which allows an objective and reliable measure of the size and relative worth of each job. The framework is underpinned by equal opportunities practice ensuring that there is no bias related to any of the protected characteristics;
- Ensure that all those involved in decisions about pay and benefits are appropriately trained;
- Allow employees to appeal against job evaluation outcomes.
- Monitor pay statistics regularly;
- Consider the impact of pay practices on the roles, levels and distribution across the organisations on the basis of sex, disability and race. We will do this by monitoring areas of occupational segregation of these characteristics;
- Assess and review the findings of monitoring activities and take action where necessary;
- Continue to work in partnership with the recognised Trade Unions on equal pay and equalities in employment;
- Inform employees of how our pay practices work and how their own pay is determined; and
- Respond appropriately to all enquiries concerning fairness in pay. We believe that the actions set out above will help ensure we avoid unfair discrimination and reward, in a fair and transparent way, the skills, experience and potential of all employees.

Fair Work Practices

At FRS/Cireco, we are fully committed to Fair Work and the Fair Work Agenda. Our organisation reflects the values in the Fair Work First Guidance published by the Scottish

Government. As a Fife Council company, we utilise the same remuneration structure and Single Status grading structure throughout the organisation as Fife Council.

Along with Fife Council, FRS/Cireco is committed to advancing the Fair Work First criteria, specifically:

1. We have an appropriate channel for effective employee voice

- we involve our recognised trade unions in key governance and decision-making structures including local consultation forums and the Fife Resource Solutions Company Forum;
- we recognise Trade Unions across all employee groups for the purpose of collective bargaining and encourage membership;
- we provide facility time to support regular engagement between our Trade Unions and their members;
- we engage in constructive dialogue with our employees and their Trade Union representatives to address workplace issues and disputes;
- employees are offered supportive contact with their supervisor through one to one and Talking Point discussions; and
- we have measures in place to support employees in the workplace and have zero tolerance of bullying and other forms of abuse and harassment.

2. We invest in workforce development

- we provide learning opportunities for employees at all levels in the FRS/Cireco;
- our Pathways Programme sets out our approach to developing employees, supporting the council, our community and our sector to nurture existing talent and encourage the next generation of resource management sector workers to make our sector a destination of choice;
- we work with Fife Council to provide suitable apprenticeships and other opportunities for young people through the Workforce Youth Investment fund; and
- formal and informal learning is offered and encouraged across the workforce, relating to specific roles as well as wider development.

3. We do not use zero hours contracts inappropriately

- supply and casual contracts are only used when necessary and workers on these contracts are not obliged to accept work when this is offered;
- we do not use supply and casual contracts to fill longer term vacancies; and
- we have a clear policy allowing workers to move from a supply/casual contract to a temporary contract or permanent contract where a longer-term need for the work has been identified.

4. We take action to tackle the gender pay gap and create a more diverse and inclusive workplace

- our equality outcomes support a number of actions to ensure we continue to understand any perceived barriers to employment with the sector and address these; and

- we gather data to understand our workforce diversity and pay gap information.

5. Providing fair pay for workers and we commit to paying the Real Living Wage

- we are an accredited Living Wage employer; and
- we support the initiative for to Fife to become a Living Wage region.

6. Flexible and family friendly working practices from day one of employment

- we support flexible working across the organisation;
- we are a Carer Positive employer; and
- through Fife Council we are a signatory to the Armed Force Covenant and support opportunities for serving members of the armed forces and veterans.

7. Oppose the use of fire and rehire practices

- we won't and don't use fire and rehire practices.

The Fair Work First criteria are also referenced in our procurement contracts to encourage third-party providers to adopt positive fair work practices. Where relevant and proportionate to do so, this may factor into the tender evaluation process and is subject to monitoring through contract management/service level agreements.

In addition to the Fair Work First criteria, FRS/Cireco has also signed up to follow the Scottish Business Pledge to reflect our position as an ALEO with a keen focus on quality, safety, equality, development and innovation. The Scottish Business Pledge is a values-led partnership between Government and business that is based on boosting productivity and competitiveness for Scottish businesses through fairness, equality and sustainable development. The three core Pledge elements are: Paying the real Living Wage; No inappropriate use of Zero Hours Contracts and Action to address the gender pay gap. In addition to these core elements, we also commit to: putting sustainability at the heart of our business; investing in a skilled and diverse workforce; engaging with our workforce; encouraging employee led creativity and innovation; supporting our community and local economy; and ensuring prompt payment for services to have a positive impact for our suppliers.

External Context

At FRS/Cireco we ensure that we honour our commitments through the Fair Work First criteria and evidence this through requirements under the Public Sector Equality Duty. This ensures that those in our employment are treated in compliance with both the International Bill of Human Rights and the International Labour Organisations Declaration on Fundamental Principles and Rights at Work.

At FRS/Cireco we expect Third Parties we work with to maintain working conditions that meet the standards expressed in the International Bill of Human Rights and the International Labour Organisations Declaration on Fundamental Principles and Rights at Work.

We expect Third Parties to share our commitment to work to deliver clear and direct social benefits, environmental benefits and economic growth, adopting the following standards:

Labour and human rights: Third Parties must uphold the highest standards of human rights and work against exploitation in the workplace. This means complying with all laws and regulations to abolish child labour, eliminate all forms of forced and compulsory labour, and ensure slavery and human trafficking are not taking place. Specifically, Third Parties must comply with the requirements of the Modern Slavery Act 2015.

Working hours, wages and benefits: Third Parties should comply with national laws and regulations relating to working hours, wages, benefits (such as public holidays, paid annual leave, sick pay), deductions, rest periods, leave and overtime. They should also provide written contracts setting out terms and conditions of employment and issue itemised wage statements. Our employees are paid the real Living Wage. We expect Third Parties to pay the Living Wage to their own employees and Third Party-contracted employees, helping to tackle in work poverty and shape an economy that is fair to all.

Diversity and equality: We expect Third Parties to treat people with respect and dignity and ensure that employees are not subject to any form of abusive conduct in the workplace. They should provide equal opportunity and treatment, employ people from a diverse talent pool based on qualifications, skills and experience, and not tolerate harassment, discrimination, retaliation, and bias on the basis of race, ethnicity, religion, gender, gender identity or expression, sex characteristics, sexual orientation, disability, age and/or any characteristic protected by law and support equal pay for work of equal value.

Health, safety and hygiene: Third Parties should comply with all applicable local laws, directives and regulations relating to health and safety in the workplace. This includes wearing the appropriate PPE, utilising suitable equipment and providing suitable training to prevent accidents and work-related illnesses.

Freedom of association and collective bargaining: Third Parties should ensure all workers and employers have the right to form and join trade unions of their own choosing without needing prior authorisation, and to bargain collectively in line with the relevant laws.

Community impact: Third Parties are encouraged to support and improve the social and economic wellbeing of the communities where they work through appropriate community involvement and investment programmes (specifically employing local people and small firms) to help them prosper and grow.

Protecting the environment: Third Parties are expected to care for and protect the environment by complying with all applicable environmental laws and regulations. They should have environmental policies and management systems in place, comparable with the requirements of ISO 14001, which we hold and work within, to mitigate environmental risks and monitor, review and make continuous improvements to their approach. Third Parties

should also aim to reduce their environmental footprint by minimising the use of energy, water and raw materials, supporting recycling and minimising emissions and waste and disposing of waste safely and responsibly.

Third party contracts: Where Third Parties are allowed under the terms of their contract to sub-contract work or services to other third parties, we expect to be informed and for those sub-contractors to also comply with the requirements of this Code. Relationships with Third Parties will normally be subject to binding contractual obligations in relation to issues including data protection and confidentiality and we may therefore need to apply them between ourselves and the Third-Party.

Supply chain management: We expect Third Parties to share our commitment to be a responsible and sustainable business, make a positive contribution to society and to manage and minimise any negative ethical, social and environmental impacts of their supply chain.