

## **RESPONSES TO THE CONSULTATION DOCUMENT *HIGH PERFORMANCE WORKPLACES – INFORMING AND CONSULTING EMPLOYEES***

### **Overview**

- 1. The DTI's consultation document *High Performance Workplaces – Informing and Consulting Employees*, was published in July 2003. It contained draft regulations to implement the EC directive on informing and consulting employees based on a framework agreed between the TUC and CBI. It asked for responses to a number of questions focussing on areas where there were outstanding issues. In parallel, there was a second round of 10 regional roadshow events which discussed the outstanding issues identified in the consultation document.**
- 2. There were over a hundred responses to the consultation document and once again the respondents represented a wide range of interests, with a quarter from individual businesses, and a quarter from representative organisations. 14 responses were from unions and the remainder came from human resource organisations, academics lawyers, the public sector and charities. The roadshow events also had a similar mix of attendees. A full list of respondents to the document and attendees at the roadshows is shown at the annex.**
- 3. There was broad support from consultees for the general principals in the legislation, although there were some concerns about how it might work in practice. Nevertheless, it was viewed by many as a potential opportunity to review and refresh the arrangements they already have in place, or to establish new arrangements for the first time.**
- 4. The questions in last year's consultation document, and a summary of the comments received, are outlined below together with the Government's response on the main issues raised.**

**What sort of guidance on the legislation would you find useful? Where would you expect to obtain advice and guidance about operating information and consultation in practice?**

- 5. Nearly all the consultees responded to this question. Many requested clear and concise guidance to assist them in setting up information and consultation (I&C) procedures and some asked for step-by-step guidelines. Some wanted good practice case studies, or scenarios, as well as diagrams, flow charts and possibly standard forms on which to base agreements. Others though were concerned that guidance might become the *de facto* standard, and were wary of anything that might be regarded as prescriptive – they wanted a brief**

outline of the legislation with links to further details. It was acknowledged that some organisations might need more in the way of guidance and information than others, especially smaller companies who did not have large human resources capability.

6. The single most important issue for many respondents was having a workplace agreement in advance of the Regulations coming into force and the requirements for “pre-existing” agreements in the legislation. It was felt that guidance should be provided as soon as possible, prior to the entry into force of the legislation, on how to put together such agreements and the means of validating them.

7. On the text of the Regulations themselves, it was requested that there should be definitions of the terminology used, for example, on the difference between establishment and undertaking, the meaning of “consultation”, the definition of an “employee”, and what is meant by phrases such as “substantial changes to work organisation or contractual relations”, and “the relevant level of management”.

8. Other issues on which it was felt that further clarification was needed included: the calculation of the 10% threshold for employee requests; the number of employees required to bring a complaint on any matter; how employees would approve a voluntary agreement; the frequency of meetings and the rights of employees to request them; how the overlap between the Regulations and other statutory obligations to consult, eg on collective redundancies, might be managed; and the treatment of stock exchange rules on confidential information.

9. In addition, guidance was requested on a number of practical matters, including: how to organise a workplace ballot, how to encourage potential representatives to put themselves forward, and how to maximise response to a ballot; what would be expected of representatives once they had been elected; what would happen if an ‘instant decision’ had to be taken by the employer; how to work with or alongside a number of trade unions where more than one was recognised; and suggestions of the methods which could be used for informing and consulting employees.

10. On the question of who should provide information and guidance and its form, as well as the DTI itself, ACAS was a popular choice for the provision of guidance, since it was considered a respected and well-known organisation. Some respondents suggested other organisations such as TUC, CBI, and CIPD. Others thought that the CAC should provide its own guidance on the role it would play in resolving disputes.

### Government response

**11. The DTI has drafted guidance on the Regulations intended to serve as an explanation of the law, and which it is publishing for consultation. To try and meet the twin demands for something relatively brief, but also something that will provide enough information to be genuinely helpful, the guidance takes the form of a main section with links to more detailed guidance on specific points, so that readers can gain a basic understanding of the legislation fairly easily, and only need to look at the more detailed guidance where points interest them. The guidance covers, amongst other issues, requirements for pre-existing agreements, arrangements that cover groups of undertakings or provide for different arrangements in different establishments, the DTI's view on the meaning of terms such as "undertaking", "consultation", "substantial changes to work organisation or contractual relations", and "relevant level of management", and the frequency and timing of information and consultation. In addition, ACAS will be publishing good practice guidance focussing on how to set up and operate effective information and consultation arrangements.**

#### **Modifications to the Regulations needed to allow agreements that cover groups of undertakings or different establishments**

**12. There was a high degree of consensus that sufficient scope was needed to allow information and consultation agreements to be struck at a level other than that of the individual undertaking and that specific drafting changes to the legislation would be needed in order to achieve the required flexibility.**

**13. Some respondents commented that the employer should have the flexibility to choose whether the I&C arrangements should operate at undertaking, establishment or group level, with the CAC resolving any disputes around these issues. On the other hand, other respondents argued that this was not something that should be left to the employer to decide. They believed that once the trigger has been pulled (ie an employee request made) at one undertaking, employee representatives should have the opportunity to approach employees at other undertakings to decide whether there is a desire to establish a group level structure.**

**14. Some employers who supported the principle of providing for group level consultation would like to see guidance clearly state that I&C agreements, whether pre-existing or newly negotiated, could operate at a level different to the undertaking level. Another respondent said that once established, an agreement should be safeguarded from a subsequent request from employees in one of the undertakings covered by the agreement.**

**15. Some trade unions connected this issue with that of the “relevant level of management” with which consultation should take place. They argued that where a holding company is taking a decision which will affect the workforce of a subsidiary company, the employee representatives in the subsidiary should have a right to consultation directly with the decision maker, rather than being obliged to rely on indirect consultation via the management of the subsidiary. Also, where a decision made by a holding company affects the workforce in several subsidiaries the Regulations should provide a mechanism through which employee representatives from all subsidiaries can jointly receive information and express views to those making decisions in the holding company.**

**16. Other respondents commented on the potential impact of the legislation on consultation currently carried out at a level below the undertaking. There was general agreement that I&C should take place at the level where decisions are taken regardless of the legal structure. This will vary from organisation to organisation but it is not always practical to treat the undertaking as one body and it would be an advantage to be able to separate out particular parts of an undertaking for the purpose of developing I&C arrangements.**

### **Government Response**

**17. Pre-existing agreements covering more than one undertaking. Draft regulation 9 has been added allowing an employer who has a pre-existing agreement covering more than one undertaking, to hold a single ballot across all the undertakings covered to ascertain whether the workforce endorses an employee request (or requests) from one or more of the undertakings covered by the agreement. In addition, where the request was not endorsed by the workforce in the ballot, the 3-year moratorium on further employee requests would apply in relation to all the undertakings covered by the agreement (draft Regulation 12 (1)(d)). Where the request was endorsed by the workforce, the obligation to negotiate a new agreement would apply in relation to all the undertakings covered by the group wide agreement. The draft guidance also makes clear (at paragraph 21) that the requirement in regulation 8(1)(c) for a pre-existing agreement to “be approved by employees” would include approval by the employees across the group, rather than by employees separately in each of the undertakings covered.**

**18. Negotiated agreements covering more than one undertaking. Draft regulation 14 has been modified to allow employers and representatives of employees to negotiate an agreement covering more than one undertaking (new paragraphs 5 and 6 of regulation 14). To do so, the employer would make an employer notification in respect of each of the undertakings to be covered, and arrange for negotiating representatives to be appointed or elected from those undertakings. The agreement**

**must cover all employees of the undertakings covered. The agreement could be approved by all the negotiating representatives, or a majority of them plus a majority of the workforce to be covered by the agreement (regulation 16(2)).**

**19. Multi-establishment agreements: the draft guidance makes clear (at paragraph 21) that the Regulations do not require information and consultation under a pre-existing or newly-negotiated agreement to be carried out at the undertaking level. The employers and employees have the freedom to agree arrangements that suit the particular organisational structure. This could involve having different arrangements at different establishments, organisation divisions, business units, or covering different parts of the workforce. In the case of pre-existing agreements, these arrangements could have been drawn up separately and at different times, approved separately and at different times, include collective agreements with unions covering parts of the workforce, and provide for quite different information and consultation arrangements in the different parts of the undertaking. The key point is that, either by themselves, or taken together with other valid pre-existing agreements, all the employees in the undertaking as a whole are covered by some arrangements, and that each agreement meets the other requirements of draft regulation 8(1). With regard to newly-negotiated agreements, the guidance again makes clear (at paragraph 32) that different arrangements may be agreed for different establishments etc, and that separate negotiations to agree these arrangements may be held.**

#### **Relationship to existing statutory information and consultation requirements**

**20. The majority of respondents asked for clarification on how the consultation requirements in the I&C Regulations and legislation on collective redundancies and business transfers (TUPE) might work together and which legislation should take 'priority'. Others wondered if it might be possible to consolidate the different legislation at some stage in the future.**

**21. One consultee believed that the I&C body should support everyday relationships and not be perceived as part of crisis management. Therefore, it should be kept apart from collective redundancies and TUPE consultations. On the other hand, one of the larger unions felt the Government should encourage consultation which takes place on a wide range of issues at the earliest opportunity and that it would be wrong to separate out consultation on collective redundancies.**

**22. Some employers voiced the concern that they did not want to have to consult on the same issue with several groups. In some cases it could**

be appropriate for the consultation to be with the I & C group, in others it would need to be with more local groups, consistent with existing legislation. There was some unease over the fact that the two separate bodies may have to be consulted at the same time, though some employers saw no great difficulty with this. The possibility of being subject to two complaints at the same time under two different pieces of legislation was also a concern to employers.

### Government Response

23. The I&C Regulations have been amended so that where employers are subject to the “standard” information and consultation provisions, and also come under an obligation under the legislation of collective redundancies or business transfers (TUPE), they are relieved of the obligation to inform and consult under the I&C Regulations (see draft regulation 20(5)). Employers must simply inform the I&C representatives in writing that they will be consulting under the legislation on collective redundancies or business transfers. The effect of this is that consultation on a collective redundancy or TUPE transfer would only be required to take place with one consultation body at one time.

24. In relation to pre-existing and newly-negotiated agreements, the draft guidance suggests that employers and employees may wish to make provision avoiding overlapping requirements with existing statutory obligations, either by expressly excluding them from the agreement, or by adopting a similar approach to that allowed under the standard provisions.

### **Relationship to collective agreements with unions**

25. There was general acknowledgement of the potential for overlap between the obligations created under the I&C Regulations and those in existing collective agreements with trade unions. The main point made, however, was that unlike I&C agreements, collective agreements apply to a “bargaining unit” and do not usually cover all the employees within the undertaking, one of the requirements of the Regulations for pre-existing agreements.

26. The general view, however, was that in most cases the interaction between a collective agreement and an I&C agreement should not prove too problematic and the employer ought to be able to work with the respective bodies to determine how the arrangements would interact in practice. A trade union body also agreed that this interaction should not be a problem in most cases and that many undertakings already

operate dual systems covering different parts of the workforce. This might mean that existing collective agreements would need to be amended to take account of those employees outside the scope of the bargaining unit, or supplementary arrangements might need to be made for them.

27. Several respondents thought the Government should not seek to make special provisions for collective agreements or trade unions in the legislation. Others took a different view, wanting it to be made easier for collective agreements to be treated as valid pre-existing agreements. For example, some trade unions argued that there should be an automatic presumption that the approval of an agreement by representatives of recognised trade union should be sufficient to indicate the approval of the workforce.

28. Many respondents said they would welcome clarification in the guidance as to the distinction between collective bargaining and consultation. There is some concern that the distinction between the two will become blurred as some consultation must be “with a view to reaching agreement”.

29. Some unions were concerned that even where there is a valid pre-existing agreement (including a collective agreement with a union), employers remain free to negotiate a new agreement, either by not holding a ballot of the workforce under regulation 8 to endorse an employee request, or by initiating negotiations themselves.

### Government Response

30. The Government’s shares the general view that there is no need to make special provision for collective agreements or for trade union representatives under the I&C legislation. In most cases, it would seem that there are already many collective bargaining arrangements in place that cover part of the workforce and other arrangements that cover the rest, sometimes as dual systems, sometimes meshed together. There is no reason why this should not continue to be the case after the I&C legislation is introduced.

31. To make it clear that a collective agreement with a trade union may constitute a valid pre-existing agreement for the purpose of regulation 8, the definition of a pre-existing agreement (in regulation 2) has been amended to state that the agreement may be with employees or their representatives. The draft guidance makes clear (at paragraph 17) that a collective agreement may be a valid pre-existing agreement, if it meets the criteria in regulation 8 (1)(a), and that the fact it may not cover all the employees in the undertaking does not matter if the other employees are covered by one or more other valid pre-existing agreements. The guidance also makes clear (at paragraph 17) that a

pre-existing agreement may be agreed by representatives of employees, including trade union representatives.

**32. Clarification on the distinction between collective bargaining and consultation with a view to reaching agreement is provided at paragraph 45 of the draft guidance.**

**33. The Government recognizes the concern expressed in paragraph 29 above about an employers' ability set up an alternative mechanism even where there are existing arrangements that some employees or unions may believe work well. However, given that there is nothing in law to stop this happening at the moment, the Government does not believe that the I&C legislation should specifically seek to exclude this possibility. Nevertheless, the draft guidance makes clear (at paragraph 19) that there would be no legal effect on a collective agreement of the workforce endorsing an employee request to negotiate a new I&C agreement, and in particular that collective bargaining, for example, over pay, would be unaffected.**

#### **Other Issues**

**34. Besides responding to the questions asked in last year's consultation document, a number of other points were raised or commented on which the Government has responded to by making modifications to the draft regulations. The main changes are set out below.**

***Time limit for employee requests.* Some respondents pointed out that if employee requests could be aggregated to reach the 10% threshold, employers may need to retain them indefinitely. Regulation 7(2) has been amended so that a request that falls short of the 10% threshold will only be valid for 6 months.**

***Start of negotiations.* Some respondents felt the period of one month before starting negotiations following an employee request or employer notification was too short. More time should be given to elect or appoint negotiating representatives and prepare for negotiations. The time period has therefore been increased to three months (regulation 14(3)).**

***Endorsement ballot.* A number of respondents pointed out that the ballot for endorsing an employee request where there is a pre-existing agreement required 40% of the workforce to endorse it, even though 60% may reject it. The ballot has therefore been made subject to a majority of those who vote in it, as well as 40% of the employees in the undertaking.**

***Pre-existing agreements.*** It was pointed out that a European Works Council agreement may meet the requirements for a pre-existing agreement in regulation 8. The definition in regulation 2 now excludes European Works Council agreements.

***Anonymous employee requests.*** The provision in regulation 7 allowing anonymous requests from employees to be made directly to a Qualified Independent Person would have been extremely difficult to operate in practice, given that different requests might be made from different parts of the workforce over a period of time. This option has therefore been taken out, and all anonymous requests would in the first instance be sent to the CAC, which may choose to outsource the task to one of the Qualified Independent Persons. In addition, the CAC's role in handling anonymous requests will now be purely administrative – it will not be required to decide at this stage whether a request is valid (though a challenge to the validity of a request could still be made subsequently to the CAC).

***Complaints.*** In the previous version of the draft Regulations, certain complaints could only be made by individual employees where there were no employee representatives. This has been changed since there may be legitimate reasons why a representative does not want to bring a complaint.

***Negotiating representatives.*** A provision has been added (regulation 15) allowing employees to challenge the identity of negotiating representatives, in view of their crucial role in the process.

***Employer failure to respond to employee request.*** A provision has been added applying the standard rules after 6 months (regulation 18(1)). As they stood previously, the Regulations would have allowed an employer who failed to respond to a request at all to avoid any consultation requirements for up to 15 months, which it was felt was too long

***I&C representatives.*** Where the standard provisions apply, a minimum of 2 representatives must be appointed (regulation 19(2)), and a provision allowing the employer to avoid the expense of a ballot has been added where there are too few candidates for election (Schedule 2, paragraph 2(a)(ii)).

***Enforcement.*** In the light of responses a number of modifications have been made: (1) The restriction on the effect of CAC orders makes clear that pending acts or agreements are covered, so that injunctive relief is not possible, something the Government has always said it did not intend to allow (regulation 22(9)). (2) An "exclusivity of remedy" provision has been added like that in other employment legislation, so that voluntary agreements would not be enforceable through the courts unless an employer agreed (regulation 24); (3) CAC orders will now be

enforceable only via the courts, not via the Employment Appeal Tribunal as well (regulation 37(3)). (4) A 3 month time limit for bringing a complaint under a negotiated agreement or the standard rules has been added (regulation 22(2)). (5) The possibility of a complaint being brought against an I&C representative or another employee has been excluded, although measures could continue to be taken against anyone who breached a confidentiality restriction (regulation 22(3) and 25(3)).

*Confidentiality restriction.* The test in regulation 25 to be applied by the CAC in resolving disputes about a confidentiality restriction has been amended to reflect the wording of Article 6.1 of the I&C Directive and to distinguish it from the test in regulation 26 for withholding confidential information (regulation 25(7)).

*Merchant shipping exemption.* A provision corresponding to that in the European Works Councils legislation has been added (regulation 41).

*Entry into force.* The date of entry into force and the transitional dates in Schedule 1 have been put back by a few days to 6 April in light of the commitment to introduce new employment legislation on two dates during the year where possible.

*Other amendments.* various other changes to the draft Regulations have been made to clarify them and make them more internally consistent.

#### Application to the public sector

35. Some respondents commented on the section in the *High Performance Workplaces* document published in 2003, which referred to the meaning of the term "undertaking", and application of the legislation in the public sector. One respondent thought that the TUPE case law should not be relied upon too much because an organisation that is an undertaking for the purposes of TUPE would not necessarily be an undertaking for the purpose of the Information and Consultation legislation. Other respondents thought that the *Henke* judgement was quite narrow and should not be taken to imply that many Civil Service Departments would not be classified as undertakings. Some Local Authority respondents thought that it would be helpful to have further guidance on this issue given the uncertainty surrounding whether Local Authorities would be undertakings for the purpose of this legislation.

#### Government Response

36. The Government believes that the relevant caselaw developed in the context of the Acquired Rights Directive and its implementing legislation, the TUPE Regulations, will help understand the meaning of the term "undertaking" in the I&C legislation, given the very similar

**definitions. The draft guidance seeks to shed further light on the subject, but acknowledges that more case law is needed to clarify the situation.**

**37. Nevertheless, the Government fully supports the principle that employees have a right to be informed and consulted about important issues affecting them regardless of whether they are working in what is legally defined as an “undertaking”. The Cabinet office in consultation with other Government departments and the Council of Civil Service Unions is therefore in the process of developing a code of practice that will apply the principles of the Information and Consultation legislation to central government departments that are not undertakings. Local Authorities would not be formally covered by the code of practice but would be expected to adhere to its principles.**

**Annex List of respondents to *High Performance Workplaces: Informing and Consulting Employees* and participants at road show events - Autumn 2003**

List of respondents to *High Performance Workplaces: Informing and consulting employees*

Accordis Acetate Chemicals	Chemical Industries Association Ltd
Action for Blind People	Cheshire County Council
Advisory Conciliation & Arbitration Service (ACAS)	Communication Workers Union
ASDA Stores Ltd	Confederation of British Industry (CBI)
Amicus - Legal & General	Coventry & Warwickshire Chamber of Commerce
Amicus	Construction Confederation
<b>Association of Chartered Certified Accountants</b>	Council of Employment Tribunal Member's Association (CETMA)
Association of Scottish Colleges	Direct Marketing Association (DMA)
Association of University Teachers	Electricity Association
Barclays Bank plc	Employers' Organisation for Local Government (includes Local Government Association & the Welsh Local Government Association)
Barnados	Employment Lawyers Association
Barnes Association	Engineering Employers Federation
Beachcroft Wansborough	Epic Group Plc
Better Regulation Taskforce	European Study Group
Birmingham Law Society	Eversheds Human Resource Group
Birmingham Power & Engineering District Committee	Falkirk Council
Blackburn & District Trades Council	Food and Drink Federation
British Association of Removers	Ford Motor Company Ltd
British Chambers of Commerce	Freshfield Bruckhaus Deringer
British Furniture Manufacturers (BFM) Ltd	General Municipal Boiler Workers (GMB)
British Hospitality Association (including The British Beer & Pub Association & Business in Sport and Leisure)	Graphical Paper & Media Union
British Limbless Ex-Servicemen's Association	Health & Safety Executive (HSE)
British Printing Industries Federation	HM Customs and Excise
British Retail Consortium	Herbert Smith
British Petroleum	Hertfordshire CIPD Policy Group
Business Services Association	Institute of Chartered Accountants in England and Wales
Chamber of Shipping	
Chartered Institute of Personnel & Development	

Institute of Directors (IOD)  
Independent Family Brewers of  
Britain  
Institute of Public Relations  
**Involvement & Participation  
Association (IPA)**  
**Jaguar Cars Ltd**  
**John Lewis Partnership**  
**John Stamford & Associates**  
**Johnson Controls Ltd**  
**Kings College London**  
**Land Rover**  
**The Law Society**  
**The Law Society of Scotland**  
**Lewis Silkin**  
**Lloyds TSB Bank Plc**  
**Manpower UK**  
**Mercer HR Consulting Ltd**  
**National Union of Journalists**  
**National Union of Teachers**  
**Newspaper Society**  
**Northern Ireland Health and  
Social Services Board**  
Northern Ireland Department of  
Finance & Personnel  
**Open University**  
**ORC Worldwide Inc**  
**Pinsents**  
**Prism Communications &  
Management Ltd**  
**Prospect**  
**Prudential Plc**  
**Public and Commercial Services  
Union**  
Purex International LLP

**Reed Executive plc**  
**Ribo Targets Ltd**  
**Rolls Royce Plc**  
**Royal Mail**  
**Royal Mail Group Plc**  
**RS Components**  
**Simmons & Simmons**  
**Skanska Construction Group Ltd**  
**South East Employers**  
**Southern Health & Social  
Services Board**  
**Tesco plc**  
**Thompsons Solicitors**  
**Trade Union Congress (TUC)**  
**Travers Smith Braithwaite**  
**UNIFI Research**  
**Union of Construction Allied  
Trades & Technicians (UCATT)**  
**Union of Shop, distributive and  
Allied Workers (USDAW)**  
**UNISON**  
**United Welsh Housing  
Association**  
**Universities Colleges &  
Employers Association**  
**University of Birmingham**  
**University of Leicester**  
**University of Leicester (Dr  
Truter)**  
**Vodafone**  
**Wales Trade Union Congress  
Cymru**  
**Watson Wyatt LLP**

## List of participants at roadshow events

Abbey National	English Wales and Scottish
ACAS	Railway Ltd
Actaris	Employers Organisation for Local
Amicus	Government
Amicus-AEEU	Essentia Group
Anchor Housing	Essex Chamber of Commerce
Amco Corporation	European Study Group
Argos Retail Group	Eurotunnel
Association of Teachers and	Fylton plc
Lecturers	FSB
AXA insurance	GMB
BALPA	Graphical Paper and Media
Birmingham International Airport	Union
Bradford and Bingley	Halliburton Wellstream
British Arab Commercial Bank	HBOS
British Engines	Imperial Tobacco
British Printing Industrial	Involvement and Participation
Federation	Association
Bromford Housing	Inland Revenue
Business Link for London	Ipswich Borough Council
Calor Gas Ltd	IIR
Cardiff University Business	ILO
School	ISTC
Caterpillar (UK) Ltd	James Robinson Group
Central Arbitration Committee	Kellog Management Services Ltd
Centre for Church & Industry	Kings College London
Chartered Institute of Personnel	Lloyds TSB
and Development	Lovells
Chamber of Commerce	Mackay Murray and Spens
Confederation of British Wool	McRoberts
Textiles Ltd	McCormicks
Commission for Health	Mencap
Improvement	Morrisons
Council of Employment Tribunal	Nortel Networks
Crane Process Flow Technologies	Norwich Union
Ltd	Nottingham City Transport
Cummins	North East Government Office
Dura Shifter System UK Ltd	Outlook Care
East of England Government	P & O
Office	Pattinson and Brewer
EDS	Pertemps Recuritment
Egg plc	Partnership
Engineering Employers Federation	Powergen

Public and Commercial Services  
Union  
Pesimmon Group  
Pinsent Curtis Biddle  
Praxis 42  
Prism Communications  
Management Ltd  
Prudential  
Rio Tinto Plc  
Royal Bank of Scotland  
RAC  
Royal Mail  
Russell & Bromley  
J Sainsbury plc  
Select  
Scottish and Newcastle  
Scottish TUC  
Scottish Power  
SE Region TUC  
Serco  
SEEDA  
Siemens  
Smith Group Plc  
Standard Life  
T & G Scotland  
Tenneco-Walker (UK)Ltd  
TGWU  
TGWU Wales  
The Edrington Group  
TUC  
TUC Wales  
Tullis Russell Group  
UCATT  
UNIFI  
Unilever Frozen Foods  
UNISON  
United Welsh Housing  
Association  
Union of Construction and allied  
trades  
University of Newcastle  
University of Warwick  
University Hospitals Coventry  
and Warwick NHS Trust  
USDAW  
West Midlands local government  
Association

Yorkshire Building Society  
Yorkshire Water  
3M UK Plc

## Roundtable Host Organisations

ACAS

CBI

Chartered Institute of Personnel and Development

Involvement and Participation Association

Engineering Employers Federation

European Study Group

Scottish TUC

TUC

University of Warwick Business School