

### Policy Statement

The Wise Recruitment Group (the Organisation) is committed to providing equal opportunities for everyone and aims to promote the benefits of diversity and inclusion in all of our activities, and to maintain an environment in which everyone feels welcomed, heard, respected, supported and valued, regardless of their background, belief, identity or any disability they may have.

*“As an employer and recruiter, the Wise Recruitment Group champions diversity and inclusion and embraces the uniqueness of each and every employee, permanent candidate and temporary worker.”*

We believe that a diverse workforce attracts a wider range of skills, views and experiences and will develop a business culture that reflects our belief and will aim to expand the media in which we recruit in order to ensure that we have a diverse employee and candidate base.

All recruitment decisions will be made on the basis of skills, qualifications, merit and ability to perform the relevant duties for the role. We will continuously review all aspects of recruitment to avoid unlawful discrimination and will treat everyone equally and will not discriminate on the grounds of an individual's "protected characteristic" under the Equality Act 2010 which are:-

- age
- disability
- gender re-assignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

The Wise Recruitment Group will not prescribe discriminatory requirements for a role and will avoid stipulating unnecessary requirements which will exclude a higher proportion of a particular group of people.

The Directors' have overall responsibility for implementing this policy, but every Manager and all employees with supervisory responsibility have departmental and local responsibility for implementing and promoting this policy. **All employees** have a responsibility to respect and comply with this policy and the Wise Recruitment Group is committed to providing training for its entire staff in equal opportunities, diversity and inclusion.

All employees must make sure they treat everyone respectfully and in a professional manner and must not:-

- Discriminate against anyone either unlawfully or against the spirit of this policy
- Accept a discriminatory job specification or request
- Persuade or pressure another employee to discriminate
- Harass, bully or abuse any person for any reason
- Condone harassment or discrimination

A full copy of our Equal Opportunity and Diversity Policy is immediately available upon request and the Company operates both a Complaints Policy and Disciplinary & Grievance Procedure to help monitor this policy.

*Keith Robinson, Managing Director*

### Discrimination

Under the Equality Act 2010 (The Act), unlawful discrimination occurs in the following circumstances:

**Direct discrimination** occurs when an individual is treated less favourably because of a protected characteristic. Treating someone less favourably means treating them badly in comparison to others that do not have that protected characteristic. It is unlawful for a recruitment consultancy to discriminate against a person on the grounds of a protected characteristic:

- in the terms on which the recruitment consultancy offers to provide any of its services;
- by refusing or deliberately omitting to provide any of its services;
- in the way it provides any of its services.

Direct discrimination can take place even if the individual does not have the protected characteristic but is treated less favourably because it is assumed he or she has the protected characteristic or is associated with someone that has the protected characteristic.

Direct discrimination would also occur if a recruitment consultancy accepted and acted upon instructions from an employer which states that certain persons are unacceptable due to a protected characteristic, unless an exception applies. The Act contains provisions that permit specifying a requirement that an individual must have a particular protected characteristic in order to undertake a job. These provisions are referred to as occupational requirements.

Where there is an occupational requirement then the client must show that applying the requirement is a proportionate means of achieving a legitimate aim, i.e. the employer must be able to objectively justify applying the requirement. An occupational requirement does not allow an employer to employ someone on less favourable terms or to subject a person to any other detriment. Neither does an occupational requirement provide an excuse against harassment or victimisation of someone who does not have the occupational requirement.

**Indirect discrimination** occurs when a provision, criterion or practice (PCP) is applied but this results in people who share a protected characteristic being placed at a disadvantage in comparison to those who do not have the protected characteristic. If the PCP can be objectively justified it will not amount to discrimination.

Indirect discrimination would also occur if a recruitment consultant accepted and acted upon an indirectly discriminatory instruction from an employer.

If the vacancy requires characteristics which amount to an occupational requirement or the instruction is discriminatory but there is an objective justification, we will not proceed with the vacancy unless the client provides written confirmation of the occupational requirement, exception or justification.

The Wise Recruitment Group will use best endeavours to comply with the Act and will not accept instructions from clients that they believe will result in unlawful discrimination.

**Harassment** is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. This includes unwanted conduct of a sexual nature.

The Wise Recruitment Group is committed to providing a work environment free from unlawful harassment and will ensure that our employees do not harass any individual. Examples of prohibited harassment are:

- verbal or written conduct containing derogatory jokes or comments;
- slurs or unwanted sexual advances;
- visual conduct such as derogatory or sexually orientated posters;
- photographs, cartoons, drawings or gestures which some may find offensive;

- physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected characteristic basis;
- threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours;
- retaliation for having reported or threatened to report harassment.

If an individual believes that they have been unlawfully harassed, they should make an immediate report to their line manager, followed with a written complaint as soon as possible after the incident. The details of the complaint should include the details of the incident, the name/s of the individual/s involved and the name/s of any witness/es.

The Organisation will undertake a thorough investigation of any allegation. If it is concluded that harassment has occurred, remedial action will be taken. All employees and workers will be expected to comply with the Organisation's policy on harassment in the workplace. Any breach of policy will lead to the appropriate disciplinary action. Any individual who is found to be responsible for harassment will be subject to the disciplinary procedure and the sanction may include termination.

**Victimisation** occurs when an individual is treated unfavourably because he/she has done a 'protected act' which is bringing a claim for unlawful discrimination or raising a grievance about discrimination or giving evidence in respect of a complaint about discrimination.

**Disabled Persons.** Discrimination occurs when a person is treated unfavourably as a result of their disability. Indirect discrimination occurs where a provision, criterion or practice is applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled.

In recruitment and selection there may be a requirement to make reasonable adjustments. For example, it might be necessary to have different application procedures for partially sighted or blind applicants that enable them to use Braille. With testing and assessment methods and procedures, tests can only be justified if they are directly related to the skills and competencies required for the job. Even then, it might be appropriate to have different levels of acceptable test results, depending on the disability. For example, an applicant with a learning disability might need more time to complete a test, or not be expected to reach the same standard as other non-disabled applicants. Reasonable adjustments in recruiting could include:

- modifying testing and assessment procedures;
- meeting the candidate at alternative premises which are more easily accessible;
- having flexibility in the timing of interviews;
- modifying application procedures and application forms;
- providing a reader or interpreter.

Wherever possible the Organisation will make reasonable adjustments to in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible, due to circumstances creating such difficulties as to render such adjustments as being beyond what is reasonable in all the circumstances.

The Wise Recruitment Group will not discriminate against a disabled person:

- in the arrangements i.e. application form, interview or arrangements for selection for determining whom a job should be offered;
- in the terms on which employment or engagement of temporary workers is offered;
- by refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability;
- in the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity;
- by subjecting the individual to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment);
- our company will make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

**Age Discrimination.** Under the Act, it is unlawful to directly or indirectly discriminate against or to harass or victimise a person because of age. Age discrimination does not just provide protection for people who are older or younger. People of all ages are protected. A reference to age is a reference to a person's age group. People who share the protected characteristic of age are people who are in the same age group.

The Wise Recruitment Group will not discriminate directly or indirectly, harass or victimise any person on the grounds of their age. We will encourage clients not to include any age criteria in job specifications and every attempt will be made to encourage clients to recruit on the basis of competence and skills and not age.

The Wise Recruitment Group is committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age. No age requirements will be stated in any job advertisements on behalf of the Organisation.

If The Wise Recruitment Group requests age as part of its recruitment process such information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the Organisation holds on all employees and workers and as part of its equal opportunities monitoring process.

Where a client requests age or date of birth, this will have to be under an occupational requirement or with an objective justification which should be confirmed in writing.

**Gender Reassignment Policy.** The Wise Recruitment Group recognises that any employee or worker may wish to change their gender during the course of their employment with the Organisation and will support any employee or worker through the reassignment.

The Wise Recruitment Group will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

Where an employee is engaged in work where the gender change imposes genuine problems, we will make every effort to reassign the employee or worker to an alternative role in the Organisation, if so desired by the employee.

Any employee or worker suffering discrimination on the grounds of gender reassignment will have recourse to the Organisation's grievance procedure.

**Part Time Workers.** This policy also covers the treatment of those employees and workers who work on a part-time basis, The Wise Recruitment Group recognises that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to our pension scheme. The Wise Recruitment Policy also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

**Recruitment of Ex-Offenders.** As a Company who applies for criminal record checks on individual, we will comply with the DBS's Code of Practice which includes having a policy on the recruitment of ex-offenders. A copy of our policy is available upon request.

### Complaints & Monitoring Procedures

The Wise Recruitment Group has in place a Complaints procedure which will help monitor compliance with this policy. This is available from the Administration Manager and will be made available immediately upon request. All complaints will be fully investigated.