

	<h1>Diversity & Inclusion Policy</h1>	Issue date: 07-Jul-25
Doc No: POL009	Author: Hannah Bloomfield	Issue No: 3

Purpose

To set out Company policy with respect to Diversity and Inclusion.

Scope

The policy applies to all employees of Smart Solutions (Recruitment) Ltd. (SSR)

Our Commitment

We are an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no person receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It also seeks to ensure that no person is victimised or subjected to any form of bullying or harassment.

This policy is intended to assist the Company to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. The Company has a separate Dignity at Work policy which deals with these issues.

Responsibilities

The overall responsibility for ensuring that this policy is implemented, maintained, monitored and communicated to all employees' rests with the Human Resources (HR) Department.

Definition

The terms equality, inclusion, diversity and equity are at the heart of this policy. 'Equality' means ensuring everyone has the same opportunities to fulfil their potential free from discrimination. 'Inclusion' means ensuring everyone feels comfortable to be themselves at work and feels the worth of their contribution. 'Diversity' means the celebration of individual differences amongst the workforce. 'Equity' means recognising barriers and that some groups are more advantaged than others, and putting measures in place to eliminate these barriers, ensuring equal opportunities for all. We will actively support diversity, equity and inclusion and ensure that our workforce is valued and treated with dignity and respect. We want to encourage everyone in our business to reach their potential.

The Law

It is unlawful to discriminate directly or indirectly in recruitment or employment on grounds of sex, gender reassignment, pregnancy, colour, race, nationality, ethnic or national origins, sexual orientation or religion or belief, or because someone is married or is a civil partner. It is unlawful to treat someone less favourably on grounds of disability than others without that disability are, or would be treated, unless the less favourable treatment can be justified, or to fail to make reasonable adjustments to overcome barriers to employment caused by disability. It is unlawful to discriminate unjustifiably on grounds of age in relation to employment. Discrimination after employment may be unlawful, e.g. in refusing to give a reference or in the form of reference given.

The Equality Act 2010 sets out when someone is disabled and protected from discrimination. The definition is quite wide - so check it even if you don't think you're disabled. For example, you might be covered if you have a learning difficulty, dyslexia, or autism.

The definition is set out in section 6 of the Equality Act 2010. It says you're disabled if:

- you have a physical or mental impairment;
- that impairment has a substantial and long-term adverse effect on your ability to carry out normal

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day-to-day activities.

It is unlawful to discriminate directly or indirectly in the provision of goods, facilities or services to customers on grounds of sex (which may include gender reassignment), pregnancy, religion or belief, sexual orientation, colour, race, nationality, or ethnic or national origins. It is unlawful to discriminate, without justification, on grounds of disability or to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation, or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services.

Some types of harassment or bullying will be unlawful discrimination.

It is unlawful to victimise someone because they have alleged unlawful discrimination or supported someone to make a complaint or given evidence in relation to a complaint.

Types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another in comparable circumstances on a prohibited ground. An example of direct sex discrimination would be refusing to employ an employee because they were pregnant. Unlike the other forms of discrimination, direct discrimination on the grounds of age can be justified.

Indirect discrimination is where a provision, criterion or practice is applied which is such that it would be to the detriment of a considerably larger proportion of the relevant group to which the individual belongs than to others, which is not objectively justifiable, and which is to the individual's detriment. An example of indirect sex discrimination could be requiring everyone to work full time unless there is a good reason, unrelated to sex, as to why the job has to be done on a full-time basis, since requiring everyone to work full time will normally adversely affect a higher proportion of women than men.

Harassment is where there is unwanted conduct related to one of the prohibited grounds which has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person, or is reasonably considered by that person to have the effect of violating his or her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him or her, even if this effect was not intended by the person responsible for the conduct.

Failure to make reasonable adjustments is where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

Victimisation is where someone is treated less favourably than others because they have alleged unlawful discrimination or supported someone to make a complaint or given evidence in relation to a complaint.

Equal opportunities in employment

The Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

The Company will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the Company considers it has good reasons, unrelated to any prohibited ground of discrimination, for doing so. The Company will comply with its obligations in relation to statutory requests for contract variations. The Company will also make reasonable adjustments to its standard working

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practices to overcome barriers caused by disability.

The Company will monitor the ethnic, gender and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will consider and take any appropriate action to address any problems which may be identified as a result of the monitoring process.

Employees will be recruited solely on the basis of work criteria and the applicant's abilities and individual merit. A disability will not of itself justify the non-recruitment of an applicant.

Reasonable adjustments to the recruitment process shall be made as are required to ensure that no applicant is disadvantaged because of his/her disability.

Before a disabled applicant is judged to have failed to meet the requirements of the job description and person specification, or to be less suitable than other applicants, full consideration will be given to whether any reasonable adjustments would make the applicant the best person for that post.

The Company cannot lawfully discriminate in the selection of employees for recruitment or promotion, but the Company may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group which the Company identifies as being underrepresented types of job.

Dignity at work

The Company has a separate dignity at work policy concerning issues of bullying and harassment on any ground, and how complaints of this type will be dealt with.

Customers, suppliers, sub-contractors' and other people not employed by the Company

The Company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Company.

Employees should report any bullying or harassment by customers, suppliers, visitors, or others to their manager who will take appropriate action.

Training

The Company will provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise. All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives regarding equal opportunities.

The Company will provide training to all existing and new employees and others engaged to work at the Company to help them understand their rights and responsibilities under the dignity at work policy and what they can do to help create a working environment free of bullying and harassment. The Company will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

Placement of Employees / Learners

Our aim is to ensure equality of treatment for all our clients in terms of the quality and appropriateness of the direct training and practical work-based experience which we have responsibility for providing. The training will be provided in accordance with the employees / learner's individual needs. Any requirements for a placement in terms of previous skills or abilities will be strictly relevant to the occupation. Selection tests will only be applied where their use is essential. We will not knowingly place clients with any organisation or employer that unlawfully discriminates in any way.

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Provisions relating to Disability

Training

All employees will have equal access to training and opportunities for promotion and other aspects of career development based solely on their abilities. In particular, each element of the promotion procedure and all training will be made accessible to disabled employees by such adjustments as are reasonable.

Where, during employment, a disabled employee recognises the need for a reasonable adjustment to working arrangements or to a feature of the premises, they should discuss this requirement with his/her line manager and/or the HR Department. The line manager and /or HR Department will then determine the appropriate action.

Induction

On starting work the employee's line manager and/or a HR representative will be responsible, in consultation with the disabled employee, for ensuring such reasonable adjustments are made as are required to enable the employee to work safely and effectively and to secure equal access to the benefits of employment.

Where the line manager and/or HR representative does not have the relevant knowledge or experience to make the reasonable adjustments they will take the appropriate professional advice. Where necessary an outside specialist may be consulted.

Benefits

Disabled employees will have equal access to all benefits and facilities of employment and reasonable adjustments will be made where necessary.

Harassment

Harassment is unwanted behaviour, whether physical, verbal or non-verbal, which is offensive, humiliating and viewed as unacceptable by the recipient.

Harassment of disabled employees will be a disciplinary offence, and may constitute gross misconduct, which could lead to dismissal.

Retention

As part of its commitment to equal opportunities for disabled people SSR will ensure that all reasonable measures are taken to retain disabled employees in employment.

It will be the responsibility of the employee's line manager and /or HR department to identify issues of disability and retention with regard to an individual employee, for example where dismissal is being considered on the grounds of sickness or incapacity.

SSR will make such adjustments as are reasonable to enable a disabled employee to carry out his/her duties. These may include, but are not limited to, provision of specialist equipment and training, job redesign, retraining, flexible hours, remote working and/or redeployment to a suitable alternative vacancy.

If, as a result of a disability, an employee is absent from work for a period of 4 weeks, SSR may request a medical, vocational or functional assessment of the employee. The aims and objectives of this assessment will be agreed by both parties. Following such an assessment a phased return to work will be arranged where possible and in consultation with the employee.

If redeployment is necessary the disabled employee will be viewed as a priority within the redeployment procedure.

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Where the post to which the disabled employee is redeployed is of a lesser grade or salary, the employee's salary will be protected at the original salary for a period of 3 months, after which they will be paid the salary for the new post.

Reasonable adjustments

Where an individual requires or may require an adjustment to the working arrangements or environment, they should bring this to the attention of his/her line manager and/or the HR Department. The prime responsibility for arranging appropriate adjustments will lie with the line manager. However, in many cases a team approach will be appropriate, for example when arranging training courses where the responsibility may pass to the training course coordinator.

The person responsible for arranging the adjustment will always consult the employee concerned, whose agreement will be sought. The expertise of the disabled employee concerning his/her own disability will be recognised.

Where the person with the prime responsibility for arranging reasonable adjustments does not have the relevant knowledge or experience, they will seek appropriate professional advice. Where required an outside specialist may be consulted with the agreement of the disabled employee.

Once an adjustment has been made its operation may need to be reviewed at agreed intervals to assess its continuing effectiveness.

Removing barriers

SSR recognises the importance of taking proactive measures to remove barriers from the working environment for disabled people. It is recognised that this will benefit not only disabled employees and prospective employees but also in many cases customers and visitors. It will ensure that SSR is able to recruit and retain the best employees on the basis of their abilities and individual merit.

Specific areas of focus should include physical access to premises; access to benefits of employment; terms and conditions of employment; recruitment; and arrangements for recruitment, performance assessment, promotion and retention.

Future plans will consider the incorporation of access improvements into maintenance plans and any refurbishments or building works.

Your Responsibilities

Every employee is required to assist the Company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

Grievances

We intend that no clients should have to suffer discrimination from any member of our staff or from employers or other sub-contractors under our direction. Learners have similar rights in the workplace to those enjoyed by other employees. All complaints of discrimination, abuse, victimisation or harassment will be treated seriously and investigated immediately with confidentiality and sensitivity. If an allegation of such behaviour by any of staff is substantiated, this will be dealt with as misconduct under our disciplinary

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code. Employers found to be unlawfully discriminating are in breach of contract with us, and as such, liable to termination of the contract.

If you consider that you may have been unlawfully discriminated against, you may use the Company's grievance procedure to make a complaint. If your complaint involves bullying or harassment, the grievance procedure is modified as set out in the dignity at work policy.

The Company will take any complaint seriously and will seek to resolve any grievance which it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Use of the Company's grievance procedure does not affect your right to make a complaint to an employment tribunal. Complaints to an employment tribunal must normally be made within three months beginning with the act of discrimination complained of.

Monitoring and review

This policy will be monitored periodically by the Company to judge its effectiveness and will be updated in accordance with changes in the law. In particular, the Company will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, the Company will implement them.

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 2018 and EU General Data Protection Regulations (GDPR)

Queries and Amendments

Any queries should be addressed to the Human Resources Department. Any amendments will be notified by revision of this document.

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