



Equal Opportunity and Diversity Policy

Introduction

- Gleeson Futures (hereafter referred to as “the Company”) embraces diversity and aims to promote the benefits of diversity in all of our business activities. We seek to develop a business culture that reflects that belief. We will expand the media in which we recruit to in order to ensure that we have a diverse employee and candidate base. We will also strive to ensure that our clients meet their own diversity targets.
- The Company is committed to diversity and will promote diversity for all employees, workers, and applicants. We will continuously review all aspects of recruitment to avoid unlawful discrimination. The Company will treat everyone equally and will not discriminate on the grounds of an individual’s “protected characteristic” under the Equality Act 2010 (the Act). These are age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity/paternity, race, religion or belief, sex, and sexual orientation. We will not discriminate on the grounds of an individual’s membership or non-membership of a Trade Union. All employees have an obligation to respect and comply with this policy. The Company is committed to providing training for its entire employees in equal opportunities and diversity. The Company will avoid stipulating unnecessary requirements which will exclude a higher proportion of a particular group of people and will not prescribe discriminatory requirements for a role.
- The Company will not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. The Company will ensure that each candidate is assessed in accordance with the candidate’s merits, qualifications, and ability to perform the relevant duties for the role.

Discrimination

Under the Act, unlawful discrimination occurs in the following circumstances:

Direct discrimination:

- 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 that they have the protected characteristic, or they are associated with someone who has the protected characteristic.
- Direct discrimination would also occur if a recruitment consultancy accepted and acted upon instructions from an employer which stated 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, 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:

- 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, The Company will not proceed with the vacancy unless the client provides written confirmation of the occupational requirement, exception, or justification.
- The Company will use best endeavours to comply with the Act and will not accept instructions from clients that will result in unlawful discrimination.

Harassment

- Under the Act, 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 Company is committed to providing a work environment free from unlawful harassment.
- The Company will ensure that the consultants 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 the Director of Operations, followed by a written complaint as soon as possible after the incident. The details of the complaint should include:
 - Details of the incident
 - Name(s) of the individual(s) involved
 - Name(s) of any witness(es)

The Company will undertake a thorough investigation of the allegations. If it is concluded that harassment has occurred, remedial action will be taken.

All employees and workers will be expected to comply with the Company's policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary action.

Any individual who The Company finds to be responsible for harassment will be subject to the disciplinary procedure and the sanction may include termination.

Victimisation

- Under the Act, victimisation occurs when an individual is treated unfavourably because they have 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.
- The Company treats any acts or allegations of victimisation very seriously and will do its utmost to not victimise any individual.

Disability

- 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 when 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. 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 and adjustments should be made where required.
- 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 Company will make reasonable adjustments to hallways, passages, and doors in order to provide and improve means of access for disabled employees and workers; however, this may not always be feasible in all circumstances.
- The Company will not discriminate against a disabled person:
 - In the arrangements (i.e. application form or interview) for selection for determining to 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)
 - The Company will make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of employees, 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.

The Company will not discriminate directly or indirectly, or 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 Company 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 company.

If the Company 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. It shall be only for compilation of personal data, which the company holds on all employees and workers, and as part of its equal opportunities monitoring process. In addition, age data shall be held on those under age 22 in order to adhere to Conduct of Employment Agencies and Employment Business Regulations 2003 and other relevant legislation applicable to children or young candidates.

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.

Part Time Workers

This policy also covers the treatment of those employees and workers who work on a part-time basis. The Company 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 Company also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

Gender Reassignment

- The Company recognises that any employee or worker may wish to change their preferred pronouns or how they identify their gender during the course of their employment with the Company.
- The Company will provide support to any employee or worker during any decisions and actions taken leading up to, during, and post-reassignment.
- The Company 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.
- Whilst the company recognises that an employee's gender identity should not impact at all on day-to-day work, should any unexpected complications occur in their employment as a direct or indirect result of reassignment that would affect their ability to work in that role, the Company will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.
- Any employee or worker suffering discrimination on the grounds of gender reassignment should refer to the Company's grievance procedure.





Recruitment of Ex-Offenders

In cases where we have registered with the Disclosure and Barring Service (DBS) and have the authority to apply for criminal records checks on individual because they are working with children or vulnerable adults or both, we will comply with the DBS's Code of Practice which includes having a policy on the recruitment of ex-offenders.

Complaints

Any discrimination complaint will be investigated fully under the Complaints Policy.

