



Equal Opportunities and Diversity Policy

General

The Company embraces diversity and will seek to promote the benefits of diversity in all of our business activities. We will seek to develop a business culture which reflects that belief. We will seek to widen the media in which we recruit to ensure as diverse an employee or candidate base as possible. We will strive to make sure that our clients meet their own diversity targets.

Empowered Personnel Ltd is committed to diversity and will promote diversity for all employees, workers and applicants and shall adhere to such a policy at all times. We will review on an ongoing basis all aspects of recruitment to avoid unlawful or undesirable discrimination. Empowered Personnel Ltd will treat everyone equally irrespective of sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or member or non-membership of a Trade Union or spent convictions, and places an obligation upon all staff to respect and act in accordance with the policy. Empowered Personnel Ltd is committed to providing training for its entire staff in equal opportunities practice. Such training is provided during the staff induction process and on an ongoing basis. Written instructions on equality in recruitment, selection, training, promotion, discipline and dismissal of employees is available to all staff via the Company's intranet site.

Empowered Personnel Ltd shall 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. Empowered Personnel Ltd will ensure that each candidate is assessed only in accordance with the candidate's merits, qualifications and abilities to perform the relevant duties required by the particular party.

Empowered Personnel Ltd will not accept instructions for clients that indicate an intention to discriminate unlawfully.

Empowered Personnel Ltd will ensure at all times that it will comply with the requirements of the Equality Act 2010.

Discrimination

Unlawful discrimination occurs in the following circumstances:

1. Direct Discrimination

Direct discrimination occurs where one individual treats or would treat another individual less favourable on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs ('the protected characteristics').

It is unlawful for a recruitment consultancy to discriminate against a person on the grounds that they are members of a protected category:

- 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 would also occur if a recruitment consultancy accepted and acted upon a job registration from an employer which states that certain persons are unacceptable because they are members of a protected category, unless one of the exceptions applies, for instance, the job demands a genuine occupational requirement or, in the case of age, the discrimination can be lawfully justified.

2. Indirect Discrimination

Indirect discrimination occurs where an agency or employer applies a provision, criterion or practice generally, but which is such that a proportion of persons in a protected category who can comply with it are considerably smaller than the proportion of persons who are not in that protected category.

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 a genuine occupational requirement or the instruction is lawfully discriminatory due to a statutory exception or objective justification, Empowered Personnel Ltd will not deal further with the vacancy unless the client provides written confirmation of such genuine occupational requirement, exception or justification.

Disabled persons

1. Direct Discrimination

Direct discrimination against a person occurs where, if for a reason which relates to the disabled persons disability, an individual:

- Treats him less favourably than he treats, or would treat others to whom that reason does not or would not apply, and,
- The employer cannot show that the treatment in question is justified.

Or

- If on the ground of a disabled persons disability, he treats the disabled person less favourably than he treats or would treat a person not having that particular disability, whose relevant circumstances, including his abilities, are the same as, or not materially different from, those of the disabled person. This type of direct discrimination can never be justified.

2. Duty to make a reasonable adjustments and to provide auxiliary aids and services

This is a similar protection to indirect discrimination in the other protected categories.

Where a provision, criterion or practice applied by or on behalf of an employer, or any physical feature of the employers premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled, it will be a duty of an employer to take such steps as



are reasonable, in all the circumstances of the case, to remove the provision, criterion, practice or physical feature.

Employment Businesses and Employment Agencies must take reasonable steps to provide auxiliary aids or services if this would make it easier for the disabled person to use their services. For instance, an appropriate auxiliary aid or service can include the provision of information on audio tape or provision of a sign language interpreter.

Empowered Personnel Ltd will not discriminate against a disabled person on the grounds of disability:

- In the arrangements i.e. application form, interview or arrangements for selection for determining to who a job should be offered; or
- In the terms on which employment or engagement of temporary workers is offered; or
- By refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- 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; or
- By subjecting him or her or them to any other detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

Empowered Personnel Ltd **will accordingly 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.**

Wherever possible, Empowered Personnel Ltd 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, due to circumstances creating such difficulties as to render such adjustments as being beyond what is reasonable in all circumstances.

Age Discrimination

Empowered Personnel Ltd 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 persuade clients to recruit on the basis of competency and skills, not age.

Empowered Personnel Ltd 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.

Empowered Personnel Ltd will request age as part of its recruitment process but 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 company holds on all employees and workers and as part of its equal opportunities monitoring process.



Part Time Workers

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

Harassment Policy

Empowered Personnel Ltd is committed to providing a work environment free from unlawful harassment on the grounds of sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or any other basis protected by legislation is unlawful and will not be tolerated by Empowered Personnel Ltd

The policy prohibits unlawful harassment by any employee or worker of Empowered Personnel Ltd

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 category basis
- Threats and demands to submit 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 you believe that you have been unlawfully harassed, you should make an immediate report to a Louise Moore, Managing Director at Empowered Personnel Ltd at 3rd Floor, 21-22 Warwick Row, Warwick Gate, Coventry, CV1 1ET followed by a written complaint as soon as possible after the incident. Your complaint should include:

- Details of the incident
- Name(s) of the individual(s) involved
- Name(s) of any witness(es).

Empowered Personnel Ltd will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, remedial action will be taken.

Any employee(s) who Empowered Personnel Ltd finds to be responsible for unlawful harassment will be subject to the disciplinary procedure and any sanction may include termination.



Gender Reassignment Policy

Empowered Personnel Ltd recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.

Empowered Personnel Ltd will support any employee Empowered Personnel Ltd has access to any relevant medical reports.

Empowered Personnel Ltd will make every effort to try and protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

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

Where an employee is engaged in work whether the gender change imposes genuine problems, Empowered Personnel Ltd 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 make recourse to the Company's grievance procedure.

Complaints and Monitoring Procedure

Empowered Personnel Ltd has in place procedures for monitoring compliance with the policy and for dealing with complaints of discrimination. These are available from Empowered Personnel Ltd at our registered office: Beechurst, 8 Commercial Road, Dereham, Norfolk, NR19 1AE and will be made available immediately upon request.

Any discrimination complaint will be investigated fully.

All applicants are invited to complete an Equal Opportunities Monitoring Form. Data is routinely collated and reviewed in order to determine the effectiveness of the Company's candidate attraction strategies. If the output reports demonstrate that any particular group is in any way under-represented, Empowered Personnel Ltd will review and amend its candidate attraction strategies accordingly, so as to address any imbalances.

Empowered Personnel Ltd will also monitor the number of employees from different gender, disability, and ethnic groups by grade when:

- In post
- Applying by post
- Taking up training and development opportunities
- Promoted



- Transferred
- Disciplined and dismissed
- Leaving employment

If the output reports demonstrate that any particular group is in any way under-represented, Empowered Personnel Ltd will take appropriate action to address any imbalances.

Policy Review

This policy document will be subject to annual review, or sooner if required by legislative change.