

Equal Opportunities and Diversity Policy

GPW0025.2



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1. Our Policy

GPW Design Services Ltd embraces diversity and aims to promote the benefits of diversity in all of our business activities, seeking to develop a business culture to reflect this belief. We also strive to ensure our clients meet their own diversity targets. All staff members have an obligation to respect and comply with this policy.

GPW Design Services Ltd is committed to continuously reviewing all aspects of recruitment to avoid any unlawful discrimination. GPW Design Services Ltd will treat everyone equally and will not discriminate on the grounds of an individual's "protected characteristics" under the Equality Act 2010 (the Act). These protected characteristics are:

- ✓ Age
- ✓ Disability
- ✓ Gender Reassignment
- ✓ Marriage and Civil Partnership
- ✓ Pregnancy and Maternity
- ✓ Race
- ✓ Religion or Belief
- ✓ Sex (gender)
- ✓ Sexual Orientation

The Company will not discriminate on the grounds of an individual's membership or non-membership or a Trade Union. GPW Design Services Ltd is committed to providing training for its entire staff in equal opportunities and diversity. GPW Design Services Ltd 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.

GPW Design Services Ltd 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. GPW Design Services Ltd 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.

2. Discrimination

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

- ✓ Direct Discrimination
- ✓ Indirect Discrimination
- ✓ Harassment
- ✓ Victimisation

2.1 Direct Discrimination

Direct Discrimination occurs when someone is treated less favourably than another person due to a protected characteristic. This type of discrimination is unlawful, regardless of whether the Company has a reason for it. Treating someone less favourably means treating a person badly in comparison to others that do not have a 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 a protected characteristic but is treated less favourable, because it is assumed that the individual has an unprotected 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. If you have appointed an employee using an occupational requirement and they no longer have that particular protected characteristic, equality law allows you to dismiss them without this being unlawful discrimination.

2.2 Indirect discrimination

Indirect discrimination occurs when a policy, practice, or rule applies equally to everyone but disproportionately disadvantages a group of people who share a protected characteristic. If these policies, rules or practices 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, GPW Design Services Ltd will not proceed with the vacancy unless the client provides written confirmation of the occupational requirement, exception or justification.

GPW Design Services Ltd will use best endeavours to comply with the Act and will not accept instructions from clients that will result in unlawful discrimination.

2.3 Harassment

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 intimidating, hostile, degrading, humiliating or offensive environment for that individual. This includes unwanted conduct of a sexual nature.

GPW Design Services Ltd is committed to creating and providing a work environment free of unlawful harassment. GPW Design Services Ltd will ensure that the consultants do not harass any individual.

Harassment can be verbal or non-verbal. Behaviour might include, but not limited to:

- ✓ Gossip or spreading malicious rumours
- ✓ Ridiculing or demeaning someone
- ✓ Inappropriate content or tone of an email, social media or other digital communication
- ✓ Overbearing supervision or misuse of power or position
- ✓ Making threats about job security without justification
- ✓ Constant criticism or deliberately undermining someone
- ✓ Preventing career progression by intentionally blocking promotion or development opportunities
- ✓ Exclusion or victimisation
- ✓ Unwelcoming sexual advances, including touching, the display or offensive materials, asking for sexual favours, or making decisions on the basis of sexual advances being accepted or rejected.

If an individual believes that they have been unlawfully harassed, they should make an immediate report to HR, 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)

GPW Design Services Ltd will ensure that the consultants do not victimise any individual.

3. Disabled Persons

The law says someone is disabled if both these apply:

- ✓ They have a 'physical or mental impairment'
- ✓ The impairment 'has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities'.

Discrimination occurs when a person is treated unfavourably as a result of their disability. The Equality Act 2010 also protects those who are no longer disabled but have had a disability in the past.

In recruitment and selection, there may be a requirement to make reasonable adjustments. There could be different types of reasonable adjustments that are needed to be made, from the way the interview is conducted, to the accessibility into the building where the interview is being held. To identify whether any reasonable adjustments need to be made prior to the interview, pre-employment health questions are permitted, giving the Company time to make these changes.

Reasonable adjustments could include:

- ✓ Modifying testing and assessment procedures;
- ✓ Having flexibility in the timing of the interview;
- ✓ Providing a reader or interpreter
- ✓ Meeting the candidate at alternative premises which are more accessible;
- ✓ Modifying the application procedure/form.

Wherever possible, GPW Design Services 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 the circumstances.

GPW Design Services Ltd 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 to; 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/her any such support; or
- ✓ By subjecting the individual to any other detriment (detriment including refusal of training or transfer, demotion, reduction of wages, or harassment).

GPW Design Services Ltd will make career opportunities available for all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

4. Age Discrimination

Under the Act, it is unlawful to directly or indirectly discriminate against or harass or victimise a person because of their age. Age discrimination does not just provide protection for people who are older or younger – people of all ages are protected. The Equality Act 2010 defines age as a person:

- ✓ Of a particular age
- ✓ Belonging to an 'age group'

The law does not say how wide an age group is. It can be quite wide, for example, the under 20s or over 50s. Terms such as 'Gen Z' or Millennials' can also indicate an age group.

GPW Design Services 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 encourage clients to recruit on the basis of competence and skills, not age.

GPW Design Services 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.

If GPW Design Services Ltd 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 completion of personal data, which the company holds on all employees and workers and as part of its equal opportunities monitoring process. In addition, if under age 22 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.

5. Part-Time Workers

This policy also covers the treatment of those employees and workers who work on a part-time basis. GPW Design Services Ltd recognises that all part-time employees are treated on the same terms as full-time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity/paternity leave, time off for dependants and access to our pension scheme. GPW Design Services Ltd also recognises that part-time employees must be treated the same as full-time employees in relation to training and redundancy situations.

6. Gender Reassignment Policy

This policy also covers the treatment of those employees and workers who work on a part-time basis. GPW Design Services Ltd recognises that all part-time employees are treated on the same terms as full-time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity/paternity leave, time off for dependants and access to our pension scheme. GPW Design Services Ltd also recognises that part-time employees must be treated the same as full-time employees in relation to training and redundancy situations.

Where an employee is engaged in work where the gender change imposes genuine problems GPW Design Services 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 assignment should have recourse to the Company's grievance procedure.

7. Recruitment of Ex-Offenders

Where GPW Design Services Ltd has registered with the Disclosure and Barring Service (DBS) and has the authority to apply for criminal record checks on individuals because they are working with children, 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.

8. Complaints and Monitoring Procedures

GPW Design Services Ltd has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available from a Director and will be made available immediately upon request. Any discrimination complaint will be investigated fully.

Thank you. Ready to recruit?

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