

EQUALITY, DIVERSITY AND INCLUSION POLICY

1. POLICY STATEMENT

- 1.1 Head Resourcing embraces equality, diversity and inclusion and will seek to promote the benefits in all of our business activities and seek to develop a business culture that reflects that belief. We will seek to widen the media in which we recruit to ensure as diverse an employee and candidate base as possible. We will strive to make sure that our clients meet their own diversity targets.
- 1.2 Head Resourcing is committed to equality, diversity and inclusion and will promote these for all employees, workers and applicants and shall adhere to such a policy at all times. We will review on an on-going basis all aspects of recruitment to avoid discrimination (direct or indirect). Head Resourcing 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 membership 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. Head Resourcing is committed to providing training for its entire staff in equality, diversity and inclusion opportunities practice.
- 1.3 Head Resourcing aims to ensure that no employee, worker or applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or in any terms of employment or engagement. Head Resourcing 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 vacancy.
- 1.4 Head Resourcing will not accept instructions from clients that indicate an intention to discriminate.
- 1.5 Head Resourcing shall operate in accordance with the Equality Act 2010.

2. OUR COMMITMENT

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- To create a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- We will review all our employment practices and procedures to ensure fairness in respect of this policy
- To partner with relevant charities, Government Departments and/or any other bodies involved in promoting EDI within business
- Breaches of this policy will be regarded as misconduct and could lead to disciplinary proceedings
- This policy is fully supported by the Board and the Management Team and will be monitored and reviewed annually in conjunction with Human Resources.

3. OUR RESPONSIBILITIES

The Board and the Management Team have an obligation to ensure all their staff are aware of the purpose and the contents of the policy and ensure that any grievance concerning discrimination is dealt with promptly and fairly.

It is every employee's responsibility to ensure that:

- he/she does not discriminate in their day to day activities or induce others to do so;
- does not victimise, harass or intimidate other staff, workers or job applicants who have, or are perceived to have one of the protected characteristics.
- no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic
- all job adverts are non-discriminatory and that selection criteria is based upon merits, qualifications and abilities to perform the relevant duties required by the particular vacancy
- informs their manager if they become aware of any discriminatory practice

4. THIRD PARTIES

Third-party harassment occurs where a Company employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. Head Resourcing will not tolerate such actions against its staff, and the employee concerned should inform their manager or Human Resources immediately. Head Resourcing will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

5. DISABLED PERSONS

Head Resourcing 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 whom 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 to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

Head Resourcing 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.

All consultants shall check with candidates before any meeting/interview if they require any reasonable adjustments to attend interview or perform their job. Wherever possible Head Resourcing 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.

6. PART-TIME WORKERS

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

7. HARASSMENT POLICY

Head Resourcing is committed to providing a work environment free from unlawful harassment on 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 Head Resourcing Ltd.

This policy prohibits unlawful harassment by any employee or worker of Head Resourcing 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 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 you believe that you have been unlawfully harassed, you should make an immediate report to your immediate manager or our Senior HR Business Partner, 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)

Head Resourcing 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 Head Resourcing finds to be responsible for unlawful harassment will be subject to the disciplinary procedure and any sanction may include termination. [A person who discriminates or harasses may be personally liable for payment of compensation to the person offended, in addition to any compensation payable by Head Resourcing Ltd. There is no statutory cap on the amount of compensation which may be awarded in discrimination cases. Under the Criminal Justice Act 1994, harassment became a criminal offence. Under the Protection from Harassment Act 1997, there are also financial and imprisonment penalties for aggravated harassment.

8. GENDER REASSIGNMENT POLICY

Head Resourcing recognises that any employee, worker or job applicant may wish to change their gender during the course of their employment or association with the Company. We will support any such person through the reassignment provided that full medical counselling has been undertaken and Head Resourcing has access to any relevant medical reports, where appropriate.

Head Resourcing 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.

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

Any employee or worker suffering discrimination on the grounds of gender reassignment should make recourse to the Company's grievance procedure.

9. TRAINING AND CONTINUOUS IMPROVEMENT

A series of equality, diversity and inclusion workshops will be held for all staff. These will be repeated as necessary. This policy is also included in our on-boarding programme.

Where necessary, specific training will be provided for managers on this policy and the associated arrangements.

As part of our continuous improvement in this area, we also champion and support various diversity initiatives, such as:

- Career Ready (a charity supporting young people from lower income families)
- Women in Technology Steering Group
- Gender Workstream, Scottish Digital Skills Programme

10. COMPLAINTS AND MONITORING PROCEDURES

Head Resourcing has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available from our Senior HR Business Partner and will be made available immediately upon request.

Any discrimination complaint will be investigated fully.

