

Equal Opportunities, Diversity, and Inclusion Policy

We believe that people from a range of backgrounds and experiences can enhance the life and development of our organisation and that all individuals should be treated based on individual merit and without prejudice.

People are our business; therefore, there are sound commercial reasons why it is critical for us that our employees, clients, and candidates fully understand the benefits of a diverse workforce such as increased flexibility, efficiency and productivity.

We aim to provide a service which actively promotes equality of opportunity and freedom from discrimination on grounds of age, cultural background, class, ethnicity, gender, religion or sexual orientation, family status, race, colour, nationality, physical or mental disability, working patterns, responsibility for dependants, political beliefs or membership or non-membership of a Trade Union, spent convictions or any other irrelevant factor.

We currently have robust policies and practices on equal opportunities and diversity. Our employee and candidate selection process are based on personal competencies, relevant experience, qualifications, and the specific work-related requirements of the job.

As an organisation we work to ensure that all our employees maximise their potential and their contribution to the company by valuing the differences between individuals and the qualities they bring to their jobs. This leads to the development of a more rewarding and productive environment where employee moral increases and attrition decreases, ultimately resulting in a positive effect on the client's work environment.

We aim to be fully representative of the population of London. We aim to recruit candidates from all possible resources to anticipate our client's needs and stay ahead of our competition.

We will strive vigorously to remove condition which place people at a disadvantage and will actively combat bigotry and discrimination. Extraman expects all employees, candidates, and suppliers to adopt this policy.

Extraman Ltd is committed to managing diversity as an employer and as a recruitment service provider. In line with this commitment our policy is to eliminate all unlawful and unfair discrimination and value the differences that a diverse workforce brings to our company.

It is our policy to treat all employees, candidates, clients, and suppliers fairly and equally regardless of their gender, sexual orientation, family status, race, colour, nationality, ethnic or national origin, religious belief, age, physical or mental disability, working patterns, responsibility for dependants, political beliefs or membership or non-membership of a Trade Union, spent convictions or any other irrelevant factor.

This policy applies to recruitment and selection, terms and conditions of employment including pay, promotion, work assignment, training, and every other aspect of employment.

Extraman Ltd shall not discriminate unlawfully when deciding which candidate is submitted for a vacancy in any terms of employment. We 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 vacancy.

Extraman will not accept instructions from clients that indicate an intention to discriminate unlawfully

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 he or she has the protected characteristic or is associated with someone that has the protected 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 to undertake a job. These provisions are referred to as occupational requirements.

Where there is an occupational requirement then 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, Extraman will not proceed with the vacancy unless the client provides written confirmation of the occupational requirement, exception, or justification.

Extraman 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.

Extraman Ltd is committed to providing a work environment free from unlawful harassment.

Extraman Ltd 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 Extraman Ltd 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)

Extraman Ltd 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 Extraman Ltd.'s policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary action.

Any individual who Extraman Ltd 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 he/she has 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.

Extraman Ltd will ensure that the consultants do not victimise any individual

DISABLED PERSONS

Discrimination occurs when a person is treated unfavourably because of their disability.

In direct discrimination occurs where a provision, criterion or practice is applied by or on behalf of an employer, or 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. For example, it might be necessary to have different application procedures for partially sighted or blind applicants that enable them to use Braille. 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. Even then, it might be appropriate to have different

levels of acceptable test results, depending on the disability. For example, an applicant with a learning disability might need more time to complete a test, or not be expected to reach the same standard as other non-disabled applicants.

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 Extraman 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.

Extraman 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; 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 the individual to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

Extraman Ltd will 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.

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.

A reference to age is a reference to a person's age group. People who share the protected characteristic of age are people who are in the same age group.

Age group can have various references:

- Under 21s
- People in their 40s
- Adults

Extraman 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 and not age.

Extraman 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 Extraman 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 compilation 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.

PART-TIME WORKERS

This policy also covers the treatment of those employees and workers who work on a part-time basis, Extraman 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.

Extraman Ltd also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

GENDER REASSIGNMENT POLICY

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

Extraman Ltd will support any employee or worker through the reassignment.

Extraman Ltd 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.

Where an employee is engaged in work where the gender change imposes genuine problems Extraman 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 have recourse to the Company's grievance procedure.

RECRUITMENT OF EX-OFFENDERS

Where Extraman Ltd has registered with the Disclosure and Barring Service (DBS) and has 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.

Responsibilities:

The HR director, Kim Trees, has overall responsibility for the application of this policy across our company. However, all managers and employees have a legal duty not to discriminate against other staff members, potential employees, candidates, and clients and are expected to promote the spirit of diversity and equal opportunities to the full.

Managers have specific responsibility for communicating the importance of, and implementing, this policy. They are expected to take positive measures to address inequality and to promote equality for all, taking action to ensure staff will reach their full potential.

Managers will treat all staff fairly, with respect and dignity, and investigate all incidents of disciplinary or harassment. While managers have specific accountabilities, equality is also the responsibilities of each employee.

We request all employees of Extraman take individual responsibility to ensure they observe and comply with this policy statement and fully support and promote the principles of diversity and inclusion.

Any breach or alleged breach of the policy will be taken seriously, investigated fully and may result in action under one or more of the company's harassments, disciplinary, or grievance procedures.

In serious cases such behaviour may constitute gross misconduct and may result in dismissal.

Aims/objectives

1. Aim to employ a permanent and temporary workforce that reflects the diverse nature of London's communities and provide a flexible service and employment practice that responds to the need of all sections of London's communities.
2. Provide fair access to work opportunities and encourage and support staff and temporary workers in fulfilling their potential.
3. Provide a safe and accessible working environment that values and respects the identity and culture of each individual and that is free from discrimination, harassment, and victimisation.
4. Involve and communicate effectively with members of staff, candidates, clients, and suppliers.
5. Provide a fair and transparent pay and reward systems.
6. Not tolerating inappropriate or offensive language or behaviour to employees' candidates and clients.
7. Provide training opportunities for staff that are expected to be equipped with the appropriate awareness, knowledge, and skills to respond positively to the range of diversity needs as identified in this policy.
8. Ensuring our services, employment opportunities and communication are physically, practically, and culturally accessible.
9. Identifying and promoting good practice and challenge deficiency and poor practice.

Monitoring, evaluating, and reviewing our Aims/Objectives:

Implementing and monitoring the impact of our policies relating to recruitment and retention processes which are non-discriminatory, and which increase accessibility of employment opportunities from all groups in the community.

We aim to provide information on this policy to our temporary workforce and listen and respond to the views of our employees and candidates regarding this policy.

We will achieve these objectives by building diversity considerations into our business and people management processes and enforcing our staff disciplinary procedure when considered necessary.

ACCOUNTABILITY, DOCUMENT AND VERSION CONTROL

This document is effective from:	9/9/2021
This document is approved by:	Kim Trees – Operations Director
For questions or queries about this document, contact:	Kim Trees – Operations Director / Gary Waller – Operations Director

The following table details any updates, changes or developments made to this document:

Version	Details	Date	Approved by
1.	Version 1 – Original policy	9/9/2021	Kim Trees
2.	Version 2 – Policy updates	11/11/2022	Kim Trees
3.	Version 3 – Policy updates	11/11/2023	Kim Trees