

DIVERSITY AND EQUAL OPPORTUNITIES.

This Policy is owned by the Compliance and Contractual Standards Manager, who is responsible for its effective implementation and timely review. The HR team, supported by the Disability Confident working group and other teams as necessary will continuously review all related policies, monitor employment practices and provide relevant advice and support to managers in championing diversity across Swift Employment Services Limited.

1. POLICY STATEMENT

Swift Employment Services Limited embraces diversity and the principle of equal opportunity in employment, and will seek to promote the benefits of diversity in all of its business activities in order to develop a business culture that reflects those beliefs. Further, we recognise that discrimination needs to be tackled and equality promoted at every level so that everyone can fulfil their potential and make a full contribution in their chosen employment.

By managing diversity we also aim to eliminate unjustifiable discrimination on the grounds of gender, gender reassignment, race, nationality, ethnic or national origin, political beliefs or membership or non-membership of a Trade Union, religious beliefs or practices, disability, marriage and civil partnership, pregnancy and maternity, sexual orientation, spent criminal convictions, age or any other inappropriate ground.

Swift Employment Services adheres to all UK equality, diversity and human rights legislation such as the Human Rights Act 1998, Race Relations Act 2000, Disability Discrimination Act 2005 and Equality Act 2010.

We actively seek to broaden our candidate pools and ensure that all decisions about the recruitment and selection of candidates are objective and based on merit, qualifications and abilities to perform the relevant duties required by the particular vacancy alone.

Consequently, Swift Employment Services Limited places an obligation upon all staff to respect and act in accordance with the policy and is committed to ensure that equality and diversity is pro-actively managed to ensure that all employees maximise their potential and the contribution to the organisation and that no one is excluded. In doing so, we also aim to support our client's business goals.

2. DISCRIMINATION

Unlawful discrimination occurs in the following circumstances:

2.1 Direct discrimination

Direct discrimination occurs where one individual treats or would treat another individual less favourably 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 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 due to 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.

2.2 Indirect Discrimination

Indirect discrimination occurs where an agency or employer applies a provision, criterion or practice generally, which disadvantages a minority group in the community on the basis of a 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, the Company will not deal further with the vacancy unless the client provides written confirmation of such genuine occupational requirement, exception or justification.

3. DISABILITY DISCRIMINATION

3.1 Direct Discrimination

Direct discrimination against a person occurs where, if for a reason which relates to the disabled person's 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 person's 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.

3.2 Duty to make reasonable adjustments

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 employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled, it will be the 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.

Agencies must take steps to provide reasonable adjustments if this would make it easier for the disabled person to use their services. For instance, an appropriate reasonable adjustment can include the provision of information on audiotape or provision of a sign language interpreter.

Swift Employment Services Limited 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).

Swift Employment Services Limited 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 Swift Employment Services Limited 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.

4. AGE DISCRIMINATION

Swift Employment Services Limited 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 competence and skills and not age.

Swift Employment Service Limited 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.

Swift Employment Services Limited 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.

5. SEXUAL ORIENTATION DISCRIMINATION

5.1 Swift Employment Services Limited recognises the right to not be discriminated against on the grounds of actual or perceived sexual orientation or the actual or perceived sexual orientation of others the employee associates with, e.g. friends, colleagues, acquaintances, relatives.

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

6. GENDER REASSIGNMENT POLICY

6.1 Swift Employment Services Limited recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.

6.2 Swift Employment Services Limited will support any employee or worker through the reassignment provided that full medical counselling has been undertaken and Swift Employment Services Limited has access to any relevant medical reports.

6.3 Swift Employment Services Limited 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.

6.4 All employees and workers will be expected to comply with Swift Employment Services Limited policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary sanction.

6.5 Where an employee is engaged in work where the gender change imposes genuine problems Swift Employment Services Limited will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.

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

7. APPLICATION OF THE POLICY

7.1 Recruitment and Selection

Swift Employment's recruitment and selection procedure is based on the necessary and justifiable job requirements and the individual's suitability.

Job profiles and person specifications are written on the basis of the job requirements for the position. Recruitment advertising will encourage applications from all backgrounds reflecting Swift Employment's commitment to diversity and equality. Recruitment advertising will appear on Job sites and social media to the audience capable of producing the best candidates. Selection methods, including interviews, are conducted in accordance with standardised procedures and checklists, designed to ensure that discrimination forms no part of the recruitment process. The objective is to make each appointment on the grounds of selecting the most suitable candidate for the post.

7.2 Training and Development

Through our performance management procedures, Swift Employment Services Limited ensure that all staff are given an opportunity to take part in both job specific training and have an individual Performance Plan designed to promote their opportunities and career advancement. The appraisal process is carried out in accordance with clear and laid down criteria to ensure that its application is free from discrimination at every stage.

7.3 Transfer, Promotion and Secondment

Transfer, promotion and secondment opportunities are made available to all employees and all appointments are based on capability ensuring equality of career advancement opportunities.

7.4. Part-time workers

This Equality and Diversity Policy also covers the treatment of those employees and workers who work on a part-time basis, Swift Employment Services Limited 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. Swift Employment Services Limited also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

8. HARASSMENT POLICY

8.1 Swift Employment Services Limited 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 Swift Employment.

8.2 This policy prohibits unlawful harassment by any employee or worker of Swift Employment Services Limited.

8.3 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.

8.4 If you believe that you have been unlawfully harassed, you should make an immediate report to Swift Employment Services Limited, 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)

8.5 Swift Employment Services Limited will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, remedial action will be taken.

8.6 Any employee(s) who Swift Employment Services Limited 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 Swift Employment Services Limited. There is no statutory cap on the amount of compensation which may be awarded in discrimination cases.]

9. VICTIMISATION

9.1 This policy prohibits victimisation by any employee or worker of Swift Employment Services Limited and will aim to avoid that a person is treated less favourably than others because he or she has brought a complaint or given evidence in proceedings under discrimination law.

9.2 Any complaint of victimisation will be dealt with seriously, promptly and confidentially. Victimisation will result in disciplinary action and may warrant dismissal.

9.3 If you believe that you have been subject to victimisation, you should make an immediate report to Swift Employment Services Limited, 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)

10. COMPLAINTS AND MONITORING PROCEDURES

10.1 Swift Employment Services Limited has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available and will be made available immediately upon request.

10.2 We emphasise that discrimination is unacceptable conduct which may lead to disciplinary action under the organisation's Disciplinary Procedure. Any discrimination complaint will be investigated fully.

11. IMPLEMENTATION

11.1 In order to implement this policy, Swift Employment Services Limited will ensure that:

- The policy is communicated to all employees, through induction training, management training, team briefings, displays on notice boards, staff handbook and made known to job applicants.
- Regional and Head Office Managers are aware of their responsibilities through appropriate and regular training
- An equal opportunities programme is in place and includes a range of initiatives, indicating where appropriate affirmative/positive action, with targets and timetables.
- Appropriate training and guidance is provided, including training on induction and management courses and annually thereafter.
- In particular, all those involved in assessing candidates for recruitment or promotion will be trained in non-discriminatory recruitment and selection techniques.
- Adequate resources are made available to fulfil the aims of this policy.

12. REVIEW AND MONITORING

12.1 Swift Employment Services Limited recognises the importance of monitoring and reviewing on its equality and diversity policy and practices, to measure progress in achieving agreed objectives.

12.2 Progress on the implementation of this policy will be reviewed annually. The policy may also be reviewed from time to time to reflect and take account of changes in legislation.

12.3 Swift Employment Services Limited will also ensure the monitoring of its employees and workers together with the monitoring of the job applicants applying for posts.

12.4 Swift Employment Services Limited will also ensure that positive action is taken to address any imbalances on the above.

13. MANAGEMENT RESPONSIBILITY

13.1 All Board members, management and staff share the responsibility to create an environment within which Swift Employment Services Limited can make measurable progress on equality and where there is genuine inclusion and respect for diversity.

13.2 People at different levels in the organisation carry varying responsibilities:

13.3 The Board of Directors are responsible for:

- Providing leadership on the agenda, acting as overall champions to ensure the policy is developed and implemented.
- Ensuring the development of Swift Employment's vision and plans within which the equality and diversity policy and strategy are integrated.
- Communicating the agenda, externally and internally.

13.4 Swift Employment's Company Secretary is responsible for:

- Agreeing overall equality and diversity policy and strategy.
- Reviewing the equality and diversity policy and strategy.
- Reviewing performance on equality at the highest levels.
- Championing equality and diversity, both internally and externally.

13.5 Swift Employment's Regional Managers are responsible for:

- Addressing equality and diversity issues in the Business Plans and performance review of their area.
- Implementing the policy and strategy as part of day-to-day management.
- Addressing equality and diversity issues in performance appraisal.
- Ensuring all staff act in accordance with the equality and diversity policy, providing necessary support and direction.
- Supporting performance review of the equality and diversity impact of Swift Employments work.

13.6 Each member of staff is responsible for:

- Actively addressing equalities issues in their day-to-day work.
- Ensuring her or his own behaviour is appropriate within the policy.
- Enabling Swift Employment to turn this policy statement into reality.

14. COMMUNICATION OF THE POLICY TO STAFF

All company policies and procedures are documented and held both as paper copies and electronic, which are accessible on line to all staff via an internal intranet.

Monthly senior management conference calls also facilitate the communication and reinforcement of our policies, procedures and best practice. Thereafter essential notices, policy changes and legislation updates are communicated to all staff electronically with updates applied to our intranet medium and during any relevant training courses.

In addition to formal communications staff are required to undertake additional training encompassing the below, where necessary to fulfill the duties of their role:

- Abuse
- Equality and Diversity
- Corporate Governance and Business ethics
- Advertising and recruitment practices
- DDA
- Challenging Age Discrimination
- Complaint Handling

15. EQUALITY AND DIVERSITY TRAINING

Equality and Diversity training is applicable to all staff following the below framework:

- Current Legislative obligations
- Understanding our values
- Promoting Anti – discriminatory practice
- Escalating examples of discrimination effectively and in a timely manner
- Working in a confidential manner
- Practical Inclusion
- Personal values

16. HOW WE WILL ACHIEVE OUR POLICY COMMITMENTS

We will work on several priorities to deliver our policy. These include:

- Mainstreaming equality and diversity issues into all relevant Swift Employment work. This means we will make integral and explicit the equalities dimensions of our work on policy making, planning, employment and the strategic development and running of Swift Employment.
- Engaging with the communities we serve and with our employees, including the views of those who experience discrimination and have diverse experiences.
- Linking employment and service delivery, recognising that how we treat our employees has an impact on how our services are perceived and experienced.
- Assessing the impact of proposed policies on diverse groups, we will develop policies that focus on the service user, rather than being convenient to Swift Employment as a service provider.
- Focusing on results by integrating equality and diversity outcomes into our performance review systems; regularly monitoring and reviewing performance.
- Training staff on equality and diversity issues within wider programmes, from induction to management development.
- Through individual performance appraisal, managers and staff will account for their performance on equalities and diversity.
- Providing effective and trusted complaints procedures for both the public and employees who are concerned about breaches of this policy.
- Communicating our work on equality and diversity, both internally and externally.
- Celebrating success in delivering on equality and diversity, through awards and recognition schemes.