

Equal Opportunities and Diversity Policy

1. Introduction and Company Commitment

Icon People Recruitment Ltd is committed to creating and maintaining a workplace that values diversity, promotes inclusion and provides equal opportunities for everyone. We believe that a diverse workforce strengthens our business by encouraging different perspectives, experiences and ideas, enabling us to deliver the highest standards of service to our clients and candidates.

The Company is dedicated to ensuring that all employment-related decisions are made fairly, consistently and solely on the basis of merit, qualifications, skills and experience. We are committed to fostering a working environment where every individual is treated with dignity, respect and professionalism, regardless of their background or personal circumstances.

As a responsible recruitment business, we actively encourage applications from individuals representing all sections of society. We continually review our recruitment methods, advertising channels and employment practices to ensure that they are inclusive and accessible, helping us attract the widest possible pool of talented candidates while supporting our clients' own diversity and inclusion objectives.

Icon People Recruitment Ltd fully supports the principles of the **Equality Act 2010** and is committed to preventing unlawful discrimination, harassment, victimisation and any other form of unfair treatment throughout every stage of employment and recruitment.

The Company does not tolerate discrimination on the basis of any protected characteristic, including:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race, colour, nationality or ethnic origin
- Religion or belief
- Sex
- Sexual orientation

In addition, no individual will receive less favourable treatment because of their membership or non-membership of a trade union or any other reason prohibited by law.

This policy applies equally to all employees, agency workers, temporary workers, contractors, applicants, clients, suppliers and any other individual acting on behalf of or in connection with the Company.

Everyone working for or representing Icon People Recruitment Ltd has a personal responsibility to uphold the principles contained within this policy and to contribute towards maintaining an inclusive, respectful and professional working environment.

The Company is committed to providing appropriate equality, diversity and inclusion training to employees and managers to ensure that recruitment decisions, workplace practices and day-to-day interactions remain fair, objective and free from unlawful discrimination.

Recruitment and selection procedures will be regularly reviewed to identify and remove any unnecessary requirements or practices that could place particular groups of individuals at a disadvantage. Selection decisions will always be based on an individual's ability to perform the duties of the role and their suitability for the position, rather than on personal characteristics unrelated to job performance.

Similarly, when introducing candidates to clients or making decisions regarding temporary assignments, permanent vacancies or employment opportunities, Icon People Recruitment Ltd will ensure that every applicant is assessed fairly and objectively using consistent selection criteria based solely on competence, qualifications, experience and the genuine requirements of the role.

Through these commitments, Icon People Recruitment Ltd aims to promote equality of opportunity, encourage diversity throughout its workforce and maintain a workplace culture where everyone has the opportunity to achieve their full potential.

2. Equal Opportunities and Types of Discrimination

2.1 Equal Opportunities

Icon People Recruitment Ltd is committed to providing equal opportunities throughout every stage of employment and recruitment. All decisions relating to recruitment, selection, placement, promotion, training, career development, remuneration and any other employment-related matter will be made fairly, consistently and without unlawful discrimination.

The Company is committed to ensuring that every applicant, employee, agency worker, temporary worker and contractor is treated with dignity, respect and impartiality. Employment decisions will always be based on an individual's qualifications, skills, experience, performance and ability to carry out the duties of the role.

As a recruitment business, we will not knowingly support or participate in discriminatory recruitment practices. Where a client requests conditions or

requirements that conflict with equality legislation, the Company will take appropriate steps to ensure compliance with the law before proceeding.

Managers and employees are expected to promote an inclusive working environment by treating colleagues, candidates, clients and all other individuals fairly and professionally at all times.

2.2 Understanding Discrimination

The Equality Act 2010 protects individuals from unfair treatment based on certain protected characteristics. Discrimination may occur in several different forms, all of which are prohibited by this policy unless specifically permitted by law.

Icon People Recruitment Ltd is committed to preventing every form of unlawful discrimination within its business activities and expects the same standard from its clients, suppliers and business partners.

The main types of discrimination covered by this policy include:

Direct Discrimination

Direct discrimination occurs when an individual is treated less favourably than another person because of a protected characteristic such as age, disability, race, religion or belief, sex, pregnancy and maternity, sexual orientation, marriage or civil partnership, or gender reassignment.

Direct discrimination may also occur where someone is treated unfairly because they are believed to possess a protected characteristic, even if that assumption is incorrect, or because they are associated with another individual who has a protected characteristic.

Icon People Recruitment Ltd will not tolerate direct discrimination in recruitment, employment, training, promotion, assignment selection or any other aspect of its business operations.

Indirect Discrimination

Indirect discrimination arises where a policy, rule, requirement or working practice applies equally to everyone but has the effect of placing individuals who share a particular protected characteristic at a disadvantage compared with others.

Such practices will only be applied where they are genuinely necessary, proportionate and can be objectively justified for a legitimate business purpose.

The Company regularly reviews its policies and procedures to identify and remove any unnecessary barriers that may unintentionally disadvantage particular groups.

Occupational Requirements

In limited circumstances, legislation allows a particular protected characteristic to be a genuine occupational requirement for a specific role.

Where a client believes that such a requirement exists, they must provide sufficient evidence demonstrating that the requirement is lawful, proportionate and necessary for the role concerned.

Icon People Recruitment Ltd will carefully assess such requests before accepting them and reserves the right to refuse any instruction that may result in unlawful discrimination.

2.3 Recruitment and Selection

The Company is committed to operating recruitment and selection processes that are transparent, objective and based solely on merit.

Candidates will be assessed against the essential requirements of the position, taking into account their qualifications, knowledge, skills, experience and overall suitability for the role.

No applicant will receive favourable or unfavourable treatment because of a protected characteristic or any other factor unrelated to their ability to perform the job.

Similarly, the Company will not submit or reject candidates based on discriminatory instructions received from clients unless a lawful occupational requirement or other legal exception applies.

2.4 Compliance with Equality Legislation

Icon People Recruitment Ltd is fully committed to complying with the Equality Act 2010 and all other relevant employment legislation.

Where there is any uncertainty regarding the legality of a recruitment instruction, employment practice or workplace decision, the Company will seek appropriate advice before proceeding.

The Company will not knowingly engage in practices that breach equality legislation and will work proactively with clients to encourage fair, inclusive and legally compliant recruitment practices.

By maintaining these standards, Icon People Recruitment Ltd aims to provide equal access to employment opportunities while promoting diversity, inclusion and respect throughout its business operations.

3. Direct Discrimination

3.1 Policy Statement

Icon People Recruitment Ltd is committed to ensuring that no individual is treated unfairly because of a protected characteristic. Every employment-related decision must be made objectively, fairly and consistently, based solely on an individual's suitability for the role.

The Company prohibits direct discrimination in all aspects of its business, including recruitment, selection, employment, training, promotion, assignments, career progression and the provision of recruitment services.

3.2 What is Direct Discrimination?

Direct discrimination occurs when a person is treated less favourably than another person in comparable circumstances because of a protected characteristic protected under the Equality Act 2010.

Protected characteristics include:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race, nationality or ethnic origin
- Religion or belief
- Sex
- Sexual orientation

Less favourable treatment may occur at any stage of the recruitment process or during employment and is unlawful unless a specific legal exception applies.

3.3 Perceived and Associative Discrimination

Direct discrimination is not limited to situations where an individual actually possesses a protected characteristic.

Unlawful discrimination may also occur where a person is treated unfavourably because:

- Someone incorrectly believes they have a protected characteristic; or
- They are associated with, related to, or connected with another individual who has a protected characteristic.

The Company recognises that such conduct is prohibited under the Equality Act 2010 and will not tolerate these forms of discrimination.

3.4 Recruitment and Client Instructions

As a recruitment business, Icon People Recruitment Ltd will not refuse to recruit, register, interview, shortlist or place an individual because of a protected characteristic.

Similarly, the Company will not knowingly accept or act upon instructions from clients that require unlawful discrimination during recruitment, selection or placement activities.

Where a client requests that certain individuals should be excluded for reasons connected to a protected characteristic, the Company will explain its legal obligations and decline to implement any instruction that would breach equality legislation.

3.5 Occupational Requirements

There are limited circumstances where legislation allows a particular protected characteristic to be an essential requirement for a specific role. These situations are known as **Genuine Occupational Requirements (GORs)**.

Before relying on such a requirement, the client must demonstrate that:

- The requirement is lawful under the Equality Act 2010.
- It is genuinely necessary for the nature of the role.
- It represents a proportionate means of achieving a legitimate business objective.

The existence of a Genuine Occupational Requirement does not permit discrimination in any other aspect of employment, including pay, benefits, promotion, training, workplace conduct or disciplinary matters.

Nor does it justify harassment, victimisation or any other form of unlawful treatment.

3.6 Company Commitment

Icon People Recruitment Ltd is committed to ensuring that all recruitment and employment decisions are based exclusively on an individual's qualifications, experience, competence and ability to perform the duties of the role.

Every candidate, employee, worker and contractor will be assessed using fair, objective and consistent criteria.

Any employee who becomes aware of conduct that may constitute direct discrimination is encouraged to report the matter immediately through the Company's grievance or reporting procedures so that it can be investigated promptly and appropriate action taken.

The Company will continue to monitor its recruitment and employment practices to ensure compliance with the Equality Act 2010 and to promote a workplace where equality, diversity and inclusion are embedded throughout the organisation.

4. Indirect Discrimination

4.1 Policy Statement

Icon People Recruitment Ltd is committed to ensuring that its policies, procedures and working practices are fair, inclusive and do not place any individual or group at an unfair disadvantage.

The Company recognises that discrimination can sometimes arise unintentionally through workplace rules or recruitment practices that appear neutral but have a disproportionate impact on people who share a protected characteristic. For this reason, all employment practices are regularly reviewed to ensure they remain fair, reasonable and legally compliant.

4.2 What is Indirect Discrimination?

Indirect discrimination occurs when a provision, criterion or workplace practice is applied equally to everyone but has the effect of placing individuals with a particular protected characteristic at a greater disadvantage than others.

A policy or practice may amount to indirect discrimination even where there was no intention to discriminate.

However, such a provision, criterion or practice may be lawful if the Company can demonstrate that it is a **proportionate means of achieving a legitimate business objective** and that no less discriminatory alternative is reasonably available.

4.3 Recruitment and Client Requirements

As a recruitment business, Icon People Recruitment Ltd will carefully assess recruitment requirements provided by clients to ensure they do not result in unlawful indirect discrimination.

Where a client requests conditions, selection criteria or working practices that could disadvantage individuals with protected characteristics, the Company will review whether those requirements are legally justified.

If there is any concern that a requirement may breach equality legislation, the Company will seek clarification before proceeding and may refuse to act upon the instruction where appropriate.

4.4 Genuine Occupational Requirements

In exceptional circumstances, a role may require a particular characteristic that is permitted under the Equality Act 2010 as a **Genuine Occupational Requirement (GOR)**.

Before accepting such a requirement, the Company will require the client to demonstrate that:

- The requirement is permitted by law.
- It is genuinely necessary for the performance of the role.
- It represents a proportionate and reasonable means of achieving a legitimate objective.
- Appropriate evidence or written justification has been provided where required.

Where these conditions cannot be satisfied, Icon People Recruitment Ltd will not support or implement recruitment instructions that could result in unlawful discrimination.

4.5 Reviewing Policies and Practices

The Company regularly reviews its recruitment procedures, employment policies and operational practices to identify any unnecessary barriers that may adversely affect particular groups.

Where a policy, procedure or working practice is found to create an unjustified disadvantage, appropriate amendments will be made to promote equality of opportunity and ensure continued compliance with the Equality Act 2010.

Managers are expected to consider the potential impact of any new policy or operational change before it is introduced.

4.6 Company Commitment

Icon People Recruitment Ltd is committed to promoting fair and objective recruitment and employment practices at every stage of the employment lifecycle.

The Company will not knowingly participate in recruitment processes or workplace practices that result in unlawful indirect discrimination and will continue to work with clients to encourage inclusive recruitment decisions based on skills, qualifications, competence and business need rather than unnecessary or discriminatory requirements.

Through regular policy reviews, staff training and ongoing monitoring, the Company aims to ensure that all individuals have equal access to employment opportunities and are treated fairly, consistently and with respect regardless of their protected characteristics.

5. Harassment

5.1 Policy Statement

Icon People Recruitment Ltd is committed to maintaining a professional, respectful and inclusive working environment where everyone is treated with dignity and courtesy. The Company has a zero-tolerance approach to harassment and will not tolerate any behaviour that creates an intimidating, hostile, degrading, humiliating or offensive environment.

This policy applies to all employees, agency workers, temporary workers, contractors, applicants, clients, suppliers and any other individual interacting with or representing the Company.

All individuals have a responsibility to contribute to a workplace that is free from unlawful harassment.

5.2 What is Harassment?

Harassment is any unwanted behaviour related to a protected characteristic that has the purpose or effect of:

- Violating a person's dignity.
- Creating an intimidating, hostile or threatening environment.
- Causing humiliation, embarrassment or offence.
- Undermining an individual's confidence, wellbeing or ability to work effectively.

Harassment may occur even where the behaviour was not intended to offend, if its impact is reasonably considered offensive or intimidating.

Unwanted conduct of a sexual nature, commonly referred to as **sexual harassment**, is also strictly prohibited.

5.3 Examples of Unacceptable Behaviour

Harassment can take many forms and may be verbal, non-verbal, physical or electronic.

Examples include, but are not limited to:

- Offensive jokes, teasing, insults or inappropriate remarks.
- Derogatory comments relating to a protected characteristic.
- Unwelcome sexual comments, invitations or advances.
- Displaying or circulating offensive images, posters, emails, videos or other material.
- Inappropriate gestures or body language.
- Bullying, intimidation or threatening behaviour.
- Unnecessary physical contact or unwanted touching.
- Spreading malicious rumours or deliberately excluding someone from workplace activities.
- Repeated behaviour that causes distress or embarrassment.
- Making employment decisions or offering workplace benefits in exchange for sexual favours.
- Retaliating against an individual for refusing inappropriate behaviour or for raising a complaint.

This list is intended as guidance only and is not exhaustive.

5.4 Company Responsibilities

Icon People Recruitment Ltd is committed to preventing harassment by:

- Promoting a culture of dignity, equality and mutual respect.
- Providing equality, diversity and workplace behaviour training.
- Taking all complaints seriously.
- Investigating allegations promptly, fairly and confidentially.
- Taking appropriate corrective or disciplinary action where misconduct is established.
- Protecting individuals who raise genuine concerns from retaliation.

Managers are expected to lead by example and take appropriate action whenever unacceptable behaviour is identified or reported.

5.5 Reporting Harassment

Any individual who believes they have experienced or witnessed harassment should report the matter as soon as reasonably possible.

Complaints may be raised with:

- A Line Manager.
- A Director.
- The Human Resources Department.
- Any other designated Company representative responsible for handling workplace concerns.

Where possible, a complaint should include:

- A description of the incident or incidents.
- The date, time and location.
- The name(s) of the individual(s) involved.
- Details of any witnesses.
- Any supporting evidence available.

Prompt reporting assists the Company in conducting a fair and effective investigation.

5.6 Investigation Process

Every complaint will be considered carefully and investigated objectively.

The Company will:

- Review all available evidence.
- Speak with relevant individuals where appropriate.
- Maintain confidentiality as far as reasonably practicable.
- Reach a fair and impartial conclusion.
- Inform the parties of the outcome where appropriate.
- Implement suitable measures to resolve the matter and prevent recurrence.

Where harassment is substantiated, disciplinary action will be taken in accordance with the Company's disciplinary procedures.

Depending on the seriousness of the misconduct, disciplinary action may include dismissal, termination of engagement or other appropriate sanctions.

5.7 Protection Against Retaliation

No individual will suffer unfavourable treatment for making a genuine complaint of harassment or for assisting in an investigation.

Any act of retaliation, intimidation or victimisation against a person who raises concerns in good faith will itself be treated as a serious disciplinary matter.

5.8 Company Commitment

Icon People Recruitment Ltd is committed to fostering a workplace where everyone feels safe, respected and valued.

The Company will continue to review its policies, provide appropriate training and promote a culture of professionalism, equality and mutual respect to ensure that harassment has no place within its business.

6. Victimisation

6.1 Policy Statement

Icon People Recruitment Ltd is committed to creating a workplace where individuals feel confident to raise concerns about discrimination, harassment or any breach of equality legislation without fear of retaliation. The Company will not tolerate victimisation in any form and is committed to protecting anyone who exercises their legal rights in good faith.

Every employee, worker, applicant, contractor and agency worker has the right to report concerns or participate in investigations without being subjected to unfair treatment.

6.2 What is Victimisation?

Victimisation occurs when an individual is treated unfairly or suffers a disadvantage because they have carried out, or are believed to have carried out, a **protected act** under the Equality Act 2010.

A protected act may include:

- Making a complaint or grievance relating to discrimination or harassment.
- Raising concerns about a possible breach of equality legislation.
- Providing evidence or acting as a witness during an investigation or legal proceedings.
- Supporting another individual who has made a discrimination complaint.
- Taking part in any formal process connected with equality or discrimination issues.

Protection applies regardless of whether the complaint is ultimately upheld, provided it was made honestly and in good faith.

6.3 Examples of Victimisation

Victimisation may take many forms, including but not limited to:

- Treating an individual less favourably after they have raised a complaint.
- Excluding someone from meetings, projects or workplace activities because they exercised their legal rights.
- Refusing training, promotion or development opportunities as a result of a protected act.
- Unfairly changing duties, working hours or responsibilities.
- Subjecting an individual to intimidation, hostility or unnecessary criticism.

- Creating barriers to career progression or employment opportunities.
- Any other conduct intended to disadvantage or penalise an individual for raising a genuine concern.

This list is intended as guidance and is not exhaustive.

6.4 Company Responsibilities

Icon People Recruitment Ltd is committed to ensuring that no person experiences victimisation for exercising their rights under equality legislation.

The Company will:

- Treat all complaints fairly, objectively and confidentially.
- Investigate allegations of victimisation promptly and impartially.
- Protect individuals who raise genuine concerns from retaliation.
- Take appropriate action where victimisation is identified.
- Promote a workplace culture based on fairness, respect and accountability.

Managers and supervisors are expected to lead by example and ensure that employees are not subjected to any form of retaliatory behaviour.

6.5 Reporting Concerns

Any individual who believes they have experienced or witnessed victimisation should report the matter without unnecessary delay through the Company's grievance, complaints or whistleblowing procedures.

All reports will be considered seriously and investigated in accordance with the Company's internal procedures.

Confidentiality will be maintained as far as reasonably practicable throughout the investigation process.

6.6 Breach of this Policy

Victimisation is regarded as serious misconduct.

Any employee, worker, manager or representative of the Company who is found to have engaged in victimisation may be subject to disciplinary action, which could include

dismissal, termination of engagement or other appropriate sanctions, depending on the circumstances.

Where a third party, such as a client, supplier or contractor, is responsible for victimising an individual, the Company will take appropriate steps to address the matter and, where necessary, review the ongoing business relationship.

6.7 Company Commitment

Icon People Recruitment Ltd encourages an open and inclusive working environment where individuals feel able to raise concerns without fear of adverse consequences.

The Company remains committed to protecting the rights of everyone who reports discrimination, harassment or other unlawful conduct in good faith, ensuring that all concerns are handled fairly, respectfully and in accordance with the Equality Act 2010.

7. Disability Inclusion and Reasonable Adjustments

7.1 Policy Statement

Icon People Recruitment Ltd is committed to providing equal opportunities for individuals with disabilities and ensuring that they are treated fairly, respectfully and without discrimination throughout every stage of recruitment, employment and career development.

The Company recognises its responsibilities under the **Equality Act 2010** and is committed to creating an inclusive working environment where disabled individuals are able to access employment opportunities and perform their roles without unnecessary barriers.

No applicant, employee, worker or contractor will be treated less favourably because of a disability or because of something arising from their disability, unless permitted by law.

7.2 Definition of Disability

For the purposes of this policy, disability has the meaning given under the Equality Act 2010.

A disability is generally defined as a physical or mental impairment that has a substantial and long-term adverse effect on an individual's ability to carry out normal day-to-day activities.

The Company recognises that disabilities may be visible or non-visible, permanent or temporary, and that every individual's circumstances are unique.

7.3 Equal Opportunities in Recruitment

Icon People Recruitment Ltd is committed to ensuring that recruitment and selection procedures are accessible and inclusive.

Applicants with disabilities will be assessed on their skills, qualifications, experience and ability to perform the essential duties of the role.

The Company will not reject an applicant simply because they have a disability where reasonable adjustments would enable them to participate in the recruitment process or perform the role successfully.

7.4 Reasonable Adjustments

Where appropriate, the Company will consider and implement reasonable adjustments to remove or reduce disadvantages experienced by disabled individuals.

Reasonable adjustments may include, but are not limited to:

- Providing alternative application formats where required.
- Making interview venues accessible.
- Offering flexibility in interview dates or times.
- Allowing additional time during assessments or recruitment tests.
- Providing readers, interpreters or other appropriate support.
- Modifying recruitment procedures where reasonable.
- Adjusting working arrangements or workplace equipment.
- Considering changes to duties or working practices where appropriate.

Each request for reasonable adjustments will be considered individually, taking into account the needs of the individual and the operational requirements of the business.

7.5 Workplace Accessibility

Where reasonably practicable, Icon People Recruitment Ltd will take appropriate steps to improve accessibility within its workplace.

This may include making reasonable modifications to facilities, workstations, entrances, meeting areas or other workplace environments to enable disabled employees and workers to perform their duties safely and effectively.

The Company recognises that certain adjustments may not always be possible where they would impose a disproportionate or unreasonable burden. In such circumstances, alternative solutions will be explored wherever practicable.

7.6 Employment Practices

The Company will not discriminate against a disabled individual in relation to:

- Recruitment and selection procedures.
- Job offers or terms of employment.
- Pay, benefits or contractual arrangements.
- Training and professional development opportunities.
- Promotion or career progression.
- Transfers or alternative employment opportunities.
- Performance management procedures.
- Disciplinary or grievance processes.
- Access to workplace facilities or employee benefits.
- Any other aspect of employment or engagement.

Employment decisions will always be based on objective business criteria and the individual's ability to fulfil the essential requirements of the role, taking into account any reasonable adjustments that may be appropriate.

7.7 Supporting Employees with Disabilities

Icon People Recruitment Ltd is committed to creating a supportive working environment in which employees feel comfortable discussing any adjustments they may require.

Managers will work collaboratively with employees, occupational health professionals (where appropriate) and other relevant specialists to identify practical solutions that enable individuals to perform their roles effectively.

The Company encourages open communication and will treat all information relating to an individual's disability with appropriate confidentiality and sensitivity.

7.8 Company Commitment

Icon People Recruitment Ltd believes that an inclusive workplace benefits both individuals and the organisation as a whole.

The Company remains committed to removing unnecessary barriers to employment, promoting equal opportunities for disabled individuals and ensuring that all employment decisions are made fairly, consistently and in accordance with the Equality Act 2010.

Through ongoing review of its policies, recruitment practices and workplace arrangements, the Company will continue to promote accessibility, inclusion and respect for everyone.

8. Age Equality

8.1 Policy Statement

Icon People Recruitment Ltd is committed to promoting equality of opportunity for individuals of all ages. The Company recognises that talent, capability and potential are not determined by age and is dedicated to ensuring that all employment decisions are based on objective business criteria rather than age-related assumptions or stereotypes.

The Company strictly prohibits unlawful discrimination, harassment or victimisation on the grounds of age in accordance with the **Equality Act 2010**.

8.2 Equal Treatment Regardless of Age

Every applicant, employee, agency worker, temporary worker and contractor will be treated fairly and consistently irrespective of their age.

This protection applies to individuals of **all age groups**, including younger and older workers. The Company recognises that age discrimination legislation protects everyone and is not limited to any particular age range.

Examples of age groups may include, but are not limited to:

- Young workers.
- Adults.
- Individuals in their 30s, 40s, 50s or older.
- Employees approaching retirement age.

No person will receive less favourable treatment because of their age unless permitted by law.

8.3 Recruitment and Selection

Recruitment and selection decisions will be based solely on the knowledge, qualifications, skills, experience and competence required for the position.

Job advertisements, person specifications and selection criteria will be designed to encourage applications from suitably qualified individuals regardless of age.

The Company will avoid using language or requirements that may unnecessarily discourage applicants from particular age groups unless there is a lawful and objectively justified reason for doing so.

8.4 Employment Decisions

Age will not be used as a factor when making decisions relating to:

- Recruitment and appointments.
- Training and professional development.
- Promotion and career progression.
- Pay and employee benefits.
- Performance management.
- Transfers and work assignments.
- Redundancy selection.
- Any other employment-related decision.

All decisions will be based on legitimate business requirements and individual merit.

8.5 Collection of Age Information

Where the Company requests an individual's date of birth or age, the information will only be collected where there is a legitimate business or legal requirement.

Such information may be required for purposes including:

- Identity verification.
- Compliance with employment legislation.
- Payroll and pension administration.
- Right to work verification.

- Equal opportunities monitoring.
- Compliance with the Conduct of Employment Agencies and Employment Businesses Regulations 2003 or any other applicable legal requirements.

Age information will never be used as the basis for unfair recruitment or employment decisions.

8.6 Client Requirements

Where a client requests age-related criteria for a vacancy, Icon People Recruitment Ltd will only consider such requests where they are supported by a lawful **Genuine Occupational Requirement (GOR)** or another legally recognised and objectively justified exception under the Equality Act 2010.

The Company may require written confirmation from the client demonstrating the legal basis for such a requirement before proceeding with the recruitment process.

Where sufficient justification cannot be provided, the Company reserves the right to refuse recruitment instructions that could result in unlawful age discrimination.

8.7 Company Commitment

Icon People Recruitment Ltd values the knowledge, experience and perspectives that individuals of all ages bring to the workplace.

The Company is committed to creating an inclusive working environment where employment opportunities are available to everyone based on ability, competence and potential rather than age.

Through regular policy reviews, staff training and fair recruitment practices, the Company will continue to promote age equality and ensure compliance with the Equality Act 2010 while supporting a diverse and inclusive workforce.

9. Part-Time Workers

9.1 Policy Statement

Icon People Recruitment Ltd is committed to ensuring that employees and workers engaged on a part-time basis are treated fairly, consistently and without discrimination. The Company recognises the valuable contribution made by part-time workers and is committed to providing equal opportunities regardless of contracted working hours.

Part-time employees will not receive less favourable treatment than comparable full-time employees unless any difference in treatment can be objectively justified or is permitted by law.

9.2 Equal Treatment

The Company is committed to ensuring that part-time workers have access to the same employment opportunities and workplace benefits as full-time employees, subject to any appropriate pro-rata adjustments where applicable.

Employment decisions affecting part-time workers will be based on business needs, performance, qualifications and experience, rather than the number of hours worked.

9.3 Terms and Conditions

Where appropriate, part-time employees will receive employment terms and benefits that are equivalent to those provided to comparable full-time employees.

This includes, where applicable:

- Rates of pay calculated on a fair and proportionate basis.
- Annual leave entitlement.
- Statutory and contractual family-related leave.
- Pension scheme participation.
- Sick leave and other contractual benefits.
- Access to employee welfare initiatives.
- Other employment benefits available under Company policies.

Where benefits are linked to working hours, they will normally be applied on a proportional basis in accordance with relevant legislation.

9.4 Training and Career Development

Part-time workers will have equal access to learning and development opportunities provided by the Company.

They will be considered fairly for:

- Internal and external training programmes.

- Professional development opportunities.
- Promotion and career progression.
- Performance reviews.
- Skills development initiatives.

Working reduced hours will not, in itself, prevent an individual from progressing within the organisation.

9.5 Recruitment, Promotion and Redundancy

The Company will ensure that part-time status is not used as a factor when making decisions relating to:

- Recruitment and selection.
- Promotion opportunities.
- Transfers or alternative roles.
- Performance management.
- Redundancy selection.
- Any other employment-related decision.

All decisions will be based on objective and transparent criteria that are applied consistently to both full-time and part-time employees.

9.6 Company Commitment

Icon People Recruitment Ltd values flexible working arrangements and recognises that part-time employment plays an important role in supporting both business needs and employee wellbeing.

The Company remains committed to maintaining a working environment where part-time employees are treated with fairness, respect and equality, and where employment opportunities are based on ability, performance and business requirements rather than contracted working hours.

Through regular policy reviews and ongoing compliance with employment legislation, the Company will continue to promote equal treatment for all employees regardless of whether they work on a full-time or part-time basis.

10. Gender Reassignment

10.1 Policy Statement

Icon People Recruitment Ltd is committed to fostering a workplace that is inclusive, respectful and free from discrimination. The Company recognises the rights of individuals who are proposing to undergo, are undergoing, or have undergone gender reassignment, and is committed to ensuring they are treated with dignity, fairness and respect at every stage of their employment.

The Company will not tolerate discrimination, harassment or victimisation related to gender reassignment and will take appropriate action where such behaviour is identified.

10.2 Equal Treatment

All employees, workers, applicants and contractors will be treated fairly regardless of their gender identity or gender reassignment status.

No individual will receive less favourable treatment in relation to recruitment, employment, promotion, training, pay, benefits, workplace facilities or any other aspect of employment because they are transitioning, intend to transition, or have previously transitioned.

Employment decisions will always be based on an individual's qualifications, skills, experience and ability to perform the duties of the role.

10.3 Support During Gender Reassignment

Where an employee or worker informs the Company that they intend to undergo, are undergoing or have undergone gender reassignment, Icon People Recruitment Ltd will work with the individual to provide appropriate support throughout the process.

Support may include:

- Discussing any reasonable workplace arrangements.
- Agreeing an appropriate communication plan where required.
- Respecting the individual's preferred name, title and pronouns.
- Considering any temporary adjustments to working arrangements where appropriate.
- Maintaining confidentiality regarding personal information.

The level of support provided will depend on the individual's circumstances and business requirements, while ensuring compliance with applicable legislation.

10.4 Confidentiality

Information relating to an individual's gender reassignment is highly sensitive personal data and will be handled with the utmost confidentiality.

Such information will only be shared where there is a legitimate business need, where required by law, or with the individual's knowledge where appropriate.

Employees are expected to respect the privacy of colleagues at all times and must not disclose confidential personal information without proper authorisation.

10.5 Protection from Discrimination and Harassment

Icon People Recruitment Ltd is committed to providing a working environment where individuals undergoing gender reassignment are protected from:

- Direct or indirect discrimination.
- Harassment or bullying.
- Victimisation.
- Offensive language or inappropriate behaviour.
- Unfair treatment in recruitment or employment decisions.

Any behaviour that undermines an individual's dignity or creates an intimidating, hostile or offensive working environment will be treated as a serious breach of Company policy.

10.6 Alternative Working Arrangements

In exceptional circumstances where practical workplace issues arise during an individual's gender reassignment, the Company will consult with the employee to identify appropriate solutions.

Where requested by the employee and where operationally feasible, consideration may be given to alternative duties, locations or working arrangements. Any changes will be discussed with the individual and implemented only where appropriate and mutually agreed.

10.7 Raising Concerns

Any employee or worker who believes they have experienced discrimination, harassment or victimisation relating to gender reassignment is encouraged to report the matter through the Company's grievance or complaints procedures.

All concerns will be treated seriously, investigated fairly and handled as confidentially as possible.

Appropriate action will be taken where misconduct is established.

10.8 Company Commitment

Icon People Recruitment Ltd is committed to creating a workplace where every individual is respected and valued regardless of gender identity.

The Company will continue to promote equality, inclusion and dignity at work by ensuring that all employees are treated fairly, supported appropriately and protected from unlawful discrimination in accordance with the **Equality Act 2010**.

Through ongoing training, policy reviews and responsible management practices, the Company aims to maintain an environment where everyone can work with confidence, respect and equal opportunity.

11. Recruitment of Ex-Offenders

11.1 Policy Statement

Icon People Recruitment Ltd is committed to promoting fair, transparent and non-discriminatory recruitment practices. The Company believes that applicants with previous criminal convictions should be considered fairly and assessed on their individual circumstances, skills, experience and suitability for the role.

A criminal record will not automatically prevent an individual from being considered for employment or engagement. Each application will be reviewed objectively, taking into account the nature of the role and any legal or regulatory requirements.

11.2 Criminal Record Checks

Where a position requires a criminal record check, Icon People Recruitment Ltd will only request such checks where they are legally permitted and relevant to the duties of the role.

For positions involving work with **children, vulnerable adults, or other regulated activities**, the Company may obtain a criminal record check through the **Disclosure and Barring Service (DBS)** or any other authorised body, where legislation permits.

Criminal record checks will only be carried out after the appropriate stage of the recruitment process and in accordance with applicable legislation.

11.3 Fair Assessment

Where criminal record information is disclosed, the Company will consider each case individually and fairly.

Factors that may be taken into account include:

- The relevance of the offence to the duties of the position.
- The seriousness and nature of the offence.
- The time that has passed since the conviction or caution.
- The circumstances surrounding the offence.
- Evidence of rehabilitation.
- Any legal restrictions or safeguarding requirements associated with the role.

No recruitment decision will be based solely on the existence of a criminal record where this is not legally justified.

11.4 Compliance with DBS Requirements

Where Icon People Recruitment Ltd is registered to carry out DBS checks, the Company will comply with all applicable legislation, the **DBS Code of Practice**, and any associated guidance relating to the handling, storage, use, retention and disposal of criminal record information.

All information obtained through criminal record checks will be processed confidentially and used only for the specific purpose for which it was requested.

11.5 Confidentiality

Information relating to criminal convictions or criminal record checks will be treated as confidential and accessed only by authorised personnel who have a legitimate business need to review the information.

Such information will be processed in accordance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and the Company's Data Protection Policy.

11.6 Company Commitment

Icon People Recruitment Ltd is committed to providing equal opportunities while ensuring compliance with safeguarding obligations and legal requirements.

The Company will continue to recruit responsibly by balancing its commitment to fairness and rehabilitation with its duty to protect clients, employees, candidates and members of the public.

Recruitment decisions will always be made objectively, consistently and in accordance with relevant legislation, ensuring that applicants are assessed on their overall suitability for the position rather than being unfairly disadvantaged because of previous convictions where these are not relevant to the role.

12. Complaints, Monitoring and Policy Review

12.1 Policy Statement

Icon People Recruitment Ltd is committed to maintaining a workplace where equality, diversity and inclusion are actively promoted and where concerns relating to discrimination, harassment, victimisation or any breach of this policy are addressed promptly, fairly and consistently.

The Company encourages individuals to raise concerns without fear of retaliation and is committed to ensuring that every complaint is handled professionally, confidentially and in accordance with applicable legislation.

12.2 Raising a Complaint

Any employee, worker, applicant, contractor, client or other individual who believes they have experienced, witnessed or become aware of conduct that may breach this policy is encouraged to report the matter as soon as reasonably practicable.

Complaints may be submitted through the Company's established grievance or complaints procedures or directly to the appropriate manager, Human Resources representative or designated Company contact responsible for equality and diversity matters.

Where possible, a complaint should include:

- A clear description of the incident or concern.
- The date, time and location of the event.
- The names of the individuals involved.

- Details of any witnesses.
- Any supporting documents or other relevant evidence.

Providing complete information will assist the Company in carrying out a thorough and impartial investigation.

12.3 Investigation Process

All complaints received under this policy will be assessed promptly and investigated objectively.

During the investigation, the Company will:

- Consider all relevant evidence.
- Speak with the parties involved where appropriate.
- Interview witnesses where necessary.
- Maintain confidentiality as far as reasonably practicable.
- Ensure that everyone involved is treated fairly and respectfully.
- Reach an impartial conclusion based on the available evidence.

Where a breach of this policy is established, the Company will take appropriate action to resolve the matter and reduce the risk of similar incidents occurring in the future.

12.4 Protection from Retaliation

No individual will be subjected to unfavourable treatment because they have raised a genuine concern, made a complaint, acted as a witness or assisted with an investigation carried out under this policy.

Any attempt to intimidate, penalise or retaliate against a person for reporting a concern in good faith will be treated as a serious disciplinary matter.

12.5 Monitoring Compliance

Icon People Recruitment Ltd will regularly monitor its recruitment practices, employment procedures and workplace policies to ensure continued compliance with the Equality Act 2010 and other relevant legislation.

Monitoring activities may include:

- Reviewing recruitment and selection processes.
- Analysing workforce diversity information where appropriate.
- Assessing training and development opportunities.
- Reviewing complaints and investigation outcomes.
- Evaluating employment practices to identify areas for improvement.
- Monitoring the effectiveness of equality, diversity and inclusion initiatives.

The information collected through monitoring will be used solely to improve Company policies and ensure fair and lawful employment practices.

12.6 Policy Review

This policy will be reviewed periodically to ensure that it remains effective, reflects current legislation and continues to support the Company's commitment to equality, diversity and inclusion.

Reviews may also be undertaken where there are significant legislative changes, operational developments or recommendations arising from internal audits, investigations or business needs.

Any updates to this policy will be communicated to employees and made available through the Company's normal policy distribution procedures.

12.7 Company Commitment

Icon People Recruitment Ltd is committed to fostering a workplace where every individual is treated fairly, respectfully and with dignity.

The Company will continue to promote equality of opportunity, encourage an inclusive culture and ensure that all complaints are managed consistently, transparently and in accordance with the principles of natural justice.

By monitoring compliance, reviewing its practices and responding effectively to concerns, the Company aims to maintain a working environment that is free from unlawful discrimination and supports equal opportunities for all.