



# RED RECRUITMENT GROUP

---

## **RED POLICY: EQUAL OPPORTUNITIES, FAIR PAY DIVERSITY & INCLUSION**

Last Revision Date: January 2025

---

**RED Recruitment Group Ltd  
Unit 6 Empire Court  
Albert Street  
Redditch  
B97 4DA**

---

**RED Recruitment Group Limited**

---

---

## CONTENTS

---

<b>1. OUR POLICY .....</b>	<b>2</b>
<b>2. DISCRIMINATION .....</b>	<b>2</b>
2.1 Direct Discrimination .....	3
2.2 Indirect discrimination .....	3
2.3 Harassment .....	4
2.4 Victimisation .....	5
<b>3. DISABLED PERSONS .....</b>	<b>5</b>
<b>4. AGE DISCRIMINATION .....</b>	<b>7</b>
<b>5. PART-TIME WORKERS.....</b>	<b>7</b>
<b><u>6. GENDER REASSIGNMENT.....</u></b>	<b>8</b>
<b>7. FAIR PAY .....</b>	<b>9</b>
<b>8. RECRUITMENT OF EX-OFFENDERS.....</b>	<b>9</b>
<b><u>8. COMPLAINTS &amp; MONITORING .....</u></b>	<b>9</b>

---

## 1. OUR POLICY

---

This Equal Opportunities Policy has been drafted with reference to the REC Equal Opportunities Code, which has been approved by the Commission for Racial Equality.

It also incorporates the Fair pay policy to ensure that men and women in the same employment, performing equal work, are entitled to equal pay under the Equality Act 2010.

RED Recruitment embraces diversity and aims to promote the benefits of diversity and inclusion in all of our business activities. We seek to develop a business culture that reflects that belief. We will expand the media in which we recruit in order to ensure that we have a diverse employee and candidate base. We will also strive to ensure that our clients meet their own diversity targets.

RED Recruitment Group Ltd is committed to diversity and inclusion and will promote diversity and inclusion for all employees, workers and applicants. We will continuously review all aspects of recruitment to avoid unlawful discrimination. RED Recruitment will treat everyone equally and will not discriminate on the grounds of an individual's "protected characteristic" under the Equality Act 2010 (the Act) which are age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

We will not discriminate on the grounds of an individual's membership or non-membership of a Trade Union. All staff have an obligation to respect and comply with this policy. RED Recruitment is committed to providing training for its entire staff in equal opportunities and diversity. RED Recruitment will avoid stipulating unnecessary requirements which will exclude a higher proportion of a particular group of people and will not prescribe discriminatory requirements for a role.

RED Recruitment will not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. RED Recruitment will ensure that each candidate is assessed in accordance with the candidate's merits, qualifications and ability to perform the relevant duties for the role.

---

## 2. DISCRIMINATION

---

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

- Direct discrimination

- Direct discrimination occurs when an individual is treated less favorably because of a protected characteristic. Treating someone less favorably 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.

### **2.1 Direct Discrimination**

Direct discrimination can take place even if the individual does not have the protected characteristic but is treated less favorably 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 in order 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.

### **2.2 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, RED recruitment will not proceed with the vacancy unless the client provides written confirmation of the occupational requirement, exception, or justification this includes pay differences depending on sexual orientation.

RED Recruitment will use best endeavors to comply with the Act and will not accept instructions from clients that will result in unlawful discrimination.

### **2.3 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.

RED Recruitment is committed to providing a work environment free from unlawful harassment.

Our definition of harassment relates to behaviour connected to what is termed a 'protected characteristic' (please see our Equal Opportunities Policy for the definition of this phrase).

We define harassment as any situation where a worker is subject to uninvited conduct that, as an intended or unintended consequence, violates their dignity in connection with a protected characteristic.

We also define harassment as behaviour that creates a hostile, humiliating, degrading or similarly offensive environment in relation to a protected characteristic. Name calling, lewd comments, excluding colleagues, making insensitive jokes, and displaying pornographic material are all examples of harassment.

Physical, verbal, and non-verbal conduct can all amount to harassment. So can things you say or do online, especially on social media. This policy covers isolated or ongoing incidents of offensive behaviour. When someone treats another person less favourably because they either submit to such behaviour or refuse to do so, we also see that as harassment.

The impact on the victim is very important. People's behaviour can amount to bullying or harassment even if they had no idea that it would be perceived that way.

#### **Third Party Harassment**

Red Recruitment aims to create a workplace which is free of harassment. This objective extends beyond acts of harassment by those working for us to harassment by third parties.

Employees are encouraged to report any third-party harassment that happens to them or that they witness happening to others.

Red Recruitment will take active steps to prevent third-party harassment of staff. Action may include signage, information in contracts etc.

Red Recruitment will assess the risk of third-party harassment in the workplace and undertake to keep our risk assessment under regular review. We encourage our employees to come forward with any areas in which they believe our third-party harassment protection could be improved.

If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. Action may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police etc.

If an individual believes that they have been unlawfully harassed, or have witnessed harassment of others, should make an immediate report to Emma Dyson – Operations Director 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)

If you are concerned about your own observations regarding the treatment of another, then sometimes the best approach is for you to challenge the behaviour or speak to your manager informally regarding your concerns.

Red Recruitment will undertake a thorough investigation of the allegations. If it is concluded that harassment has occurred, remedial action will be taken which may include disciplinary action.

Any individual who Red Recruitment finds to be responsible for harassment will be subject to the disciplinary procedure and the sanction may include termination.

## **2.4 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.

Red Recruitment will ensure that the consultants do not victimise any individual. You should never be victimised or treated less favourably if you raise a harassment or bullying complaint, and you must inform your manager as soon as possible if you believe you have been subjected to this type of treatment.

---

## **3. 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 RED Recruitment will make reasonable adjustments to hallways, passages and doors 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.

**RED Recruitment 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).

Red Recruitment 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.

---

## 4. 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

RED Recruitment 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.

RED Recruitment 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 RED Recruitment 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.

---

## 5. PART-TIME WORKERS

---

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

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



---

## 6. GENDER REASSIGNMENT

---

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

RED Recruitment will support any employee or worker through the reassignment.

RED Recruitment 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 RED Recruitment 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.

---

## 7. FAIR PAY POLICY

---

Fair pay policy is to ensure that men and women in the same employment, performing equal work, are entitled to equal pay under the Equality Act 2010. unless a pay difference can be justified. The right to equal pay applies to employees, workers (including agency workers), on full-, part-time, or temporary contracts, apprentices and self-employed people.

By law, employers must not pay an employee less, or give them terms and conditions that put them at a disadvantage, because of disability, race, religion or belief, sexual orientation, or another 'protected characteristic'.

---

## 8. RECRUITMENT OF EX-OFFENDERS

---

Red Recruitment adhere to its obligations under the section 122 of the Police Act 1977, and comply with the DBS code of practice and all other relevant legislation.

---

## 9. COMPLAINTS & MONITORING

---

RED Recruitment has in place procedures for monitoring compliance for this policy and for dealing with complaints of discrimination. Any discrimination complaint will be investigated fully.