CONTROLLED POLICY

B04 – EQUALITY, DIVERSITY, INCLUSION AND HUMAN RIGHTS POLICY

Policy Reference	B04	**Version**	1.0
Policy Owner	PHSSL Staffing Limited	**Approved By**	Lade Awosika, Director
Approval Method	Approved electronically	**Approval Date**	September 2026
Review Date	September 2027	**Status**	Controlled Document
Applies To	All PHSSL Staffing Limited staff, candidates, agency workers and relevant contractors	**Supersedes**	New policy

1. Purpose

PHSSL Staffing Limited is committed to equality of opportunity, dignity, inclusion and respect. This policy sets out how PHSSL will prevent unlawful discrimination, promote fair treatment and respect human rights in recruitment, employment-business activities, temporary assignments, permanent introductions and relationships with clients and workers.

2. Scope

This policy applies to directors, employees, recruiters, candidates, agency workers, temporary workers and relevant contractors. It covers advertising, recruitment, selection, pay administration, training, allocation of assignments, client interaction, conduct, complaints and termination of engagement.

3. Legal Framework

- Equality Act 2010.
- Human Rights Act 1998.
- Employment rights and agency-worker legislation where applicable.
- Data Protection Act 2018 and UK GDPR.
- Applicable safeguarding, modern slavery and employment-agency requirements.

4. Protected Characteristics

PHSSL will not unlawfully discriminate because of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation. Protection also extends in relevant circumstances to discrimination by association or perception.

5. Forms of Unlawful Discrimination

- Direct discrimination.
- Indirect discrimination.
- Harassment.
- Victimisation.
- Discrimination arising from disability.
- Failure to make reasonable adjustments where the duty applies.
- Other prohibited conduct under equality law.

6. Recruitment and Selection

Recruitment decisions will be based on objective, role-related criteria such as skills, experience, qualifications, competence, availability and lawful suitability requirements. PHSSL will not use discriminatory wording, assumptions or client preferences as a basis for selection.

7. Client Requests

PHSSL will not comply with a client's request to select or exclude workers on an unlawfully discriminatory basis. Where a client raises a genuine occupational requirement or other lawful exception, management must ensure that the legal basis is appropriate and documented before it is relied upon.

8. Reasonable Adjustments

PHSSL will consider reasonable adjustments for disabled candidates and workers in recruitment and in matters within PHSSL's control. Where an adjustment relates to a client workplace or assignment, PHSSL will work with the worker and client as appropriate while respecting confidentiality.

9. Pregnancy and Maternity

Pregnancy, maternity or related absence must not result in unlawful disadvantage. Health and safety considerations will be addressed through appropriate risk assessment rather than assumptions about a person's ability to work.

10. Religion or Belief

PHSSL will respect religion or belief and consider reasonable requests relating to dress, prayer, observance or working arrangements, subject to legitimate safety, service and legal requirements. Decisions must be proportionate and non-discriminatory.

11. Race, Nationality and Right to Work

Right-to-work checks will be completed as required by law without assumptions based on race, colour, nationality, ethnicity, accent, name or appearance. Possessing a particular nationality must not be confused with having or lacking permission to work.

12. Age

Age will not be used as a selection criterion unless a specific legal requirement or objectively justified rule applies. Experience requirements should be expressed in terms of skills and competence rather than unnecessary age-related proxies.

13. Sex, Gender Reassignment and Sexual Orientation

Workers and candidates must be treated with dignity regardless of sex, gender reassignment or sexual orientation. Harassment, intrusive questioning, outing, ridicule or discriminatory allocation of work is unacceptable.

14. Marriage and Civil Partnership

Recruitment and employment-business decisions must not unlawfully disadvantage a person because they are married or in a civil partnership.

15. Harassment and Bullying

PHSSL will not tolerate unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment and harassment related to a protected characteristic will be addressed promptly.

16. Third-Party Conduct

Where a PHSSL worker experiences discriminatory or harassing conduct from a client, service user, colleague or other third party, the worker should report it promptly. PHSSL will consider the worker's safety, the client's response, contractual options and any legal or safeguarding implications.

17. Allocation of Assignments

Assignment opportunities will be allocated using legitimate business and role criteria. Protected characteristics must not be used to favour or exclude workers except where a lawful exception genuinely applies.

18. Pay and Terms

PHSSL will administer pay and contractual terms fairly and in accordance with applicable law. Equality concerns about pay, holiday, assignment conditions or access to opportunities will be investigated.

19. Agency Worker Rights

Where the Agency Workers Regulations 2010 apply, PHSSL will cooperate with hirers to support applicable day-one rights and equal-treatment rights after the relevant qualifying period. Workers should raise concerns if they believe applicable rights are not being observed.

20. Human Rights and Dignity

PHSSL's working practices will respect fundamental rights and dignity, including privacy, freedom from degrading treatment, freedom of thought, conscience and religion, and protection from discrimination, subject to the lawful framework applicable to private organisations and the particular service context.

21. Equality Monitoring

PHSSL may collect equality-monitoring information to understand representation and improve practice. Monitoring information will be handled confidentially, separated from selection decisions as far as practicable and processed in accordance with data-protection requirements.

22. Complaints and Reporting

Candidates and workers may raise equality, discrimination, harassment or victimisation concerns through PHSSL's complaints, grievance or speaking-up routes as appropriate. Genuine concerns must not result in retaliation.

23. Safeguarding and Hate-Related Concerns

Discriminatory abuse, hate incidents or harassment involving children or adults at risk may also be safeguarding matters. Workers must follow the relevant safeguarding procedure and urgent safety concerns must be escalated immediately.

24. Training

Recruitment and management staff will receive information or training appropriate to their roles on fair selection, equality, reasonable adjustments, harassment and lawful client requirements. Workers are expected to follow client equality and dignity standards while on assignment.

25. Responsibilities of Staff and Workers

- Treat others with dignity and respect.
- Do not discriminate, harass, bully or victimise.
- Use objective criteria in recruitment and assignment decisions.
- Raise concerns about discriminatory client requests or conduct.
- Respect confidentiality and individual differences.
- Cooperate with reasonable adjustments and investigations.

26. Management Responsibilities

- Promote fair and inclusive recruitment and worker management.
- Challenge discriminatory requests or practices.
- Consider and document reasonable adjustments.
- Investigate equality-related complaints appropriately.
- Monitor trends and implement learning.
- Keep policies and practices under review as equality law develops.

27. Breaches

Breaches of this policy may lead to disciplinary, contractual or other appropriate action. Serious discrimination, harassment, victimisation or retaliation may also expose individuals or organisations to legal consequences.

28. Related PHSSL Staffing Policies

- A03 Records Management, Confidentiality and Data Protection Policy.
- A04 Complaints, Concerns and Service Feedback Policy.

- B01 Safeguarding Adults Policy.
- B02 Safeguarding Children and Young People Policy.
- B03 Whistleblowing / Speaking Up Policy.
- B05 Modern Slavery, Human Trafficking and Exploitation Policy.
- C01 Recruitment, Selection and Safer Employment Policy.
- C02 DBS, Right to Work, References and Pre-Employment Checks Policy.

29. Monitoring and Review

PHSSL will monitor equality-related complaints, recruitment patterns, worker and client feedback and relevant governance information. This policy will be reviewed at least annually, or sooner following significant legal change, a serious incident, audit findings or identified learning.

Approved by	Lade Awosika
Position	Director
Approval method	Approved electronically
Approval date / next review	September 2026 / September 2027