

## **Equality, Diversity, Equity & Non-Discrimination Policy**

### **1. Policy Statement**

Aqumen Recruitment is committed to providing a working environment that is **inclusive, fair, and free from unlawful discrimination**, and to conducting its recruitment and employment activities in a way that respects **human rights, dignity and equality of opportunity**.

This policy is informed by:

- The **Equality Act 2010** and supporting **ACAS guidance**
- **SEDEX SMETA 7.0 Workplace Requirements**
- The **UN Guiding Principles on Business and Human Rights (UNGPs)**

Aqumen Recruitment recognises that **treating everyone identically (equality)** does not always result in fair outcomes. We therefore aim to adopt an **equity-based approach**, providing reasonable and proportionate support or adjustments where required to ensure individuals have a **genuine and fair opportunity** to access work, perform their role and progress.

### **2. Scope**

This policy applies to:

- Employees
- Agency and temporary workers
- Contractors
- Candidates and applicants
- Any individual working on behalf of Aqumen Recruitment

All staff are required to comply with this policy.

### **3. Legal & Ethical Framework**

#### **UK Law & ACAS Guidance**

Under the **Equality Act 2010**, discrimination is unlawful where it relates to a protected characteristic. ACAS guidance confirms that employers should: This includes a commitment to prevent discrimination because of a protected characteristic under the Equality Act 2010 or any other status protected by law, including trade union membership or activities.

- Prevent direct and indirect discrimination
- Make **reasonable adjustments**
- Promote fair treatment and inclusion
- Encourage early resolution of concerns without retaliation

Aqumen Recruitment aligns its practices with this guidance.

#### **SEDEX / SMETA**

SMETA 7.0 requires organisations to:

- Prevent discrimination
- Assess **management systems**, not just outcomes
- Remove barriers that may disadvantage certain worker groups
- Apply an equity-based approach where necessary and possible

#### **UN Guiding Principles on Business & Human Rights**

The UNGPs require businesses to:

- Avoid causing or contributing to discrimination
- Address adverse impacts were identified
- Embed respect for human rights into policies and procedures

This policy forms part of Aqumen Recruitment's human-rights due-diligence framework.

#### 4. Equality, Diversity & Equity

Aqumen Recruitment values diversity and seeks to reflect this in all business activities.

Employment decisions are based on **merit, qualifications, experience and ability**.

Where individuals face barriers due to personal circumstances or protected characteristics, Aqumen Recruitment may implement **equity measures**, including reasonable adjustments, to ensure fair access and opportunity. These measures are:

- Proportionate
  - Considered on an individual basis
  - Reviewed regularly
- They do **not** constitute preferential treatment or unlawful discrimination.

#### 5. Non-Discrimination

Aqumen Recruitment will not unlawfully discriminate, harass or victimise any individual because of:

- Protected Characteristic such as:
  - Age
  - Disability
  - Gender reassignment
  - Marriage or civil partnership
  - Pregnancy or maternity
  - Race, nationality, ethnic or national origin
  - Religion or belief
  - Sex
  - Sexual orientation
- Any other status protected by law such as:
  - Trade union membership or activity

This applies to and is not limited to recruitment, selection, placement, training, pay, promotion, discipline and termination.

#### 6. Types of Discrimination

- **Direct discrimination:** treating someone less favourably due to a protected characteristic
- **Indirect discrimination:** applying a provision, criterion or practice that disadvantages a protected group unless objectively justified
- **Harassment:** unwanted conduct that violates dignity or creates an intimidating or hostile environment
- **Victimisation:** unfavourable treatment because an individual has raised or supported a complaint

Aqumen Recruitment will not accept or act on discriminatory client instructions unless a lawful occupational requirement or objective justification exists and is confirmed in writing.

#### 7. Prevention of Sexual Harassment

In line with current UK legislation Aqumen will take reasonable steps to prevent sexual harassment, including harassment by third parties such as clients, customers or suppliers. Sexual harassment will not be tolerated in any form. Concerns will be taken seriously and addressed promptly.

#### 8. Equity & Reasonable Adjustments

In line with UK law and SMETA 7.0, Aqumen Recruitment may implement reasonable adjustments, including but not limited to:

- Adjusted application or assessment processes
- Flexible interview arrangements
- Additional time for assessments

- Modified duties or working arrangements
- Specialist equipment or accessibility support
- Language or communication support
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## 9. Client instructions and Third-Party Conduct

Aqumen will not accept or act upon instructions from clients or third parties that are discriminatory, unlawful, or inconsistent with this policy.

Whereas a client asserts that a requirement may be lawful due to an occupational requirement or objective justification, this will be reviewed internally and appropriately documented before any action is taken.

## 10. Reporting & Complaints

Individuals are encouraged to raise concerns or complaints without fear of retaliation. All complaints will be:

- Taken seriously
- Investigated promptly and confidentially
- Addressed fairly and proportionately

Aqumen Recruitment has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available from Andy Taylor Director (responsible for compliance) or within your New Starter Pack and will be made available immediately upon request. Any complaint made against any of the subjects mentioned in this document will be investigated fully.

## 11. Responsibilities

- Senior management are responsible for implementation and oversight
- Managers must apply this policy fairly and consistently
- All workers are expected to comply with this policy

## 12. Monitoring & Review

This policy is reviewed regularly to ensure continued compliance with:

- UK legislation and ACAS guidance
- SMETA / SEDEX requirements
- UN Guiding Principles on Business & Human Rights

**Approved by: Managing Director AQUMEN RECRUITMENT**

**ACCOUNTABILITY, DOCUMENT AND VERSION CONTROL**

This document is effective from:	10 <sup>th</sup> February 2026
This document is approved by:	Gill Taylor MD
For questions or queries about this document, contact:	John Davies / Andy Taylor

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

Version Number	Detail	Date	Approved by
1	Original policy issued as Equality & Diversity Policy	May 2019	MD
2	Reviewed to include (post-2024 harassment duty) and introduction of Equity as per external SEDEX audit January 2026	10 <sup>th</sup> February 2026	MD

**Next Review: February 2027**