

The Consultants Agency Ltd EQUAL OPPORTUNITIES AND DIVERSITY POLICY

1. GENERAL

- 1.1. The Consultants Agency Ltd embraces diversity and will seek to promote the benefits of diversity in all of our business activities. We will seek to develop a business culture that reflects that belief. We will seek to widen the media in which we recruit to ensure as diverse an employee and candidate base as possible. We will strive to make sure that our clients meet their own diversity targets.

The Consultants Agency Ltd is committed to diversity and will promote diversity for all employees, workers and applicants and shall adhere to such a policy at all times. We will review on an on-going basis all aspects of recruitment to avoid unlawful or undesirable discrimination. The Consultants Agency Ltd will treat everyone equally irrespective 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 membership or non-membership of a Trade Union or spent convictions, and places an obligation upon all staff to respect and act in accordance with the policy. The Consultants Agency Ltd is committed to providing training for its entire staff in equal opportunities practice. The Consultants Agency Ltd shall avoid stipulating any unnecessary requirements which would exclude a higher proportion of a particular gender, sexual orientation, age, religion or racial group or which would exclude disabled job applicants; and will avoid prescribing any requirements as to marital or civil partnership status.

- 1.2. The Consultants Agency Ltd shall 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. The Consultants Agency Ltd will ensure that each candidate is assessed only in accordance with the candidate's merits, qualifications and abilities to perform the relevant duties required by the particular vacancy.
- 1.3. The Consultants Agency Ltd will not accept instructions from clients that indicate an intention to discriminate unlawfully.

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 because 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 categories").

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 Consultants Agency Ltd will not deal further with the vacancy unless the client provides written confirmation of such genuine occupational requirement, exception or justification.

2.3. **DISABLED PERSONS**

2.3.1. **Discrimination**

Direct discrimination against a person occurs where, a person is treated less favourably because of disability, either their own disability or because someone they are associated with has a disability.

Indirect discriminations occurs when a practice, criterion or provision which cannot be objectively justified is applied to everyone but results in person with a disability being placed at a disadvantage.

Disability arising from discrimination occurs when a person is treated unfavourably because of something arising in connection with their disability.

2.3.2. **Duty to make reasonable adjustments and to provide auxiliary aids and services**

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 reasonable steps to provide auxiliary aids or services if this would make it easier for the disabled person to use their services. For instance, an appropriate auxiliary aid or service can include the provision of information on audiotape or provision of a sign language interpreter.

The Consultants Agency Ltd 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).

The Consultants Agency Ltd 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 The Consultants Agency Ltd 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.

3. AGE DISCRIMINATION

The Consultants Agency Ltd 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.

The Consultants Agency Ltd 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.

The Consultants Agency Ltd 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.

4. PART-TIME WORKERS

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

5. HARASSMENT POLICY

- 5.1. The Consultants Agency Ltd 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 [Recruitment Company].

- 5.2. This policy prohibits unlawful harassment by any employee or worker of [Recruitment Company].
- 5.3. Examples of prohibited harassment are:
 - 5.3.1. verbal or written conduct containing derogatory jokes or comments;
 - 5.3.2. slurs or unwanted sexual advances;
 - 5.3.3. visual conduct such as derogatory or sexually orientated posters;
 - 5.3.4. photographs, cartoons, drawings or gestures which some may find offensive;
 - 5.3.5. physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected category basis;
 - 5.3.6. 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;
 - 5.3.7. Retaliation for having reported or threatened to report harassment.
- 5.4. If you believe that you have been unlawfully harassed, you should make an immediate report to [] 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)
- 5.5. The Consultants Agency Ltd will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, remedial action will be taken.
- 5.6. Any employee(s) who The Consultants Agency Ltd 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 [Recruitment Company]. There is no statutory cap on the amount of compensation which may be awarded in discrimination cases. Under the Criminal Justice Act 1994, harassment became a criminal offence, punishable by a fine of up to £5,000 and/or a prison term of up to 6 months. Under the Protection from Harassment Act 1997, the penalties for aggravated harassment are an unlimited fine and/or 5 years imprisonment.]

6. GENDER REASSIGNMENT POLICY

- 6.1. The Consultants Agency Ltd recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.
- 6.2. The Consultants Agency Ltd will support any employee or worker through the reassignment.
- 6.3. The Consultants Agency Ltd 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 [Recruitment Company]'s 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 The Consultants Agency Ltd 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. COMPLAINTS AND MONITORING PROCEDURES

- 7.1. The Consultants Agency Ltd has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available from [name[s]] and will be made available immediately upon request. [You should ensure that you have proper written procedures for complaints together with details of your monitoring and reviewing procedures available with this policy].
- 7.2. Any discrimination complaint will be investigated fully.

Sustainable Recruitment Policy

Sustainable Recruitment & Procurement Policy

Overall aim

This strategy describes how The Consultants Agency Ltd will conduct its recruitment and purchasing activities to support the achievement of sustainable development objectives.. Wider policy drivers, such as achieving value for money, efficiency, risk management and legal compliance are not covered specifically within this strategy as they are already addressed by existing policies and procedures.

The aim of this strategy is to ensure that locums, goods and services hired or purchased by the Trust are recruited, used, managed, manufactured, delivered and at end-of-life in an environmentally and socially responsible manner.

This strategy has been developed in order to meet The Consultants Agency Ltd recruitment of 'compliant' locum doctors and purchasing targets and in full knowledge of guidelines from NHS Professionals and NHS PASA/Buying Solutions and new Frameworks.

The strategy

The Consultants Agency Ltd's recruitment and purchasing activity will contribute to the achievement of sustainable development objectives, by seeking to optimise the wider social and environmental benefits to society that can derive from effective recruitment, purchasing decisions and efficient purchasing and placement procedures.

Scope

This strategy applies to the whole of The Consultants Agency Ltd when conducting procurement and recruitment activities.

Context

The Consultants Agency Ltd has an important role to play in furthering sustainable recruitment as well as its impact in providing doctors to the NHS. In essence, sustainable procurement means working with the whole of our supply chain to minimise the environmental and social impacts of products (locum doctors) and services throughout their life cycle as well as in reference to bought goods i.e. from raw materials and manufacturing through to their final disposal

Embracing sustainable recruitment and procurement will facilitate one of The Consultants Agency Ltd objectives of ' maximising the contribution of recruitment and placement of doctors and purchasing and supply to improve the health and well-being of the population of England and indeed the world, as well as the doctors themselves '

Everything purchased and used by The Consultants Agency Ltd, including the supply of locum doctors has an impact on the environment, on people and communities, but these impacts are not always apparent. In many cases, however, the environmental and social impacts associated with goods and services are not taken into account during the procurement process. The EU Consolidated Procurement Directive advocates the consideration of environmental and social factors in the procurement process, as does the UK Office of Government Commerce and the Treasury when aiming to achieve value for money through procurement.

Social risks include: Human rights issues such as poor working conditions and discrimination (i.e. need to promote equal opportunities)

Direct impacts on local communities both in the UK and overseas

Health and safety implications of products and services

Key Strategic Objectives

This strategy will be implemented to achieve the following strategic objectives, to ensure the The Consultants Agency Ltd remains a leader in the field of sustainable procurement as well as a Medical recruitment agency

- 1: Develop policies to facilitate and promote sustainable procurement.
- 2: Develop and embed tools that enable sustainability objectives to be addressed in the procurement process, such as not taking doctors from countries who need more medical aid.
- 3: Deliver training that helps embed sustainable procurement objectives within The Consultants Agency Ltd and Trusts, such as Health and Safety, BLS/ATLS, good practices within The Consultants Agency Ltd such as good reference practice, documents verified, AWR, CRB, GMC, updated CV's and full Occupational Health Checks
- 4: Work with suppliers to improve the sustainability performance of the supply chain such as with our Occupational Health supplier to ensure up to date NHS PASA standard compliance, ensure with our customers to always provide compliant doctors.
- 5: Communicate progress to achieve sustainable procurement objectives each week at the Monday meeting

Supporting objectives

The supporting objectives will be:

- 1: Develop policies to facilitate and promote sustainable procurement,
2. Implement existing policies that support the achievement of sustainable development, such as environmental purchasing, race equality, supporting small to medium enterprises and social enterprises and ethnic and minority businesses
3. Develop policies as required to meet wider government priorities, such as Health and Safety, NHS PASA changing requirements, , sustainable timber and following The Consultants Agency Ltd's Environmental Policy to meet specific targets
4. Review emerging policies and priorities as required, and develop appropriate courses of action
5. Develop and embed tools that enable sustainability objectives to be addressed in the recruitment and procurement process
 - Ensure that contract specifications meet minimum government standards, such as sustainable timber, recycled paper, green energy
 - Embed NHS PASA policy and related guidance into The Consultants Agency Ltd recruitment procedures, as required
 - Introduce relevant sustainability clauses into The Consultants Agency Ltd Operations and Policy Procedure Manual, and its Terms and Conditions of Contract, as appropriate
 - Work with the NHS Purchasing and Supply Agency to ensure sustainability tools are effective and embedded within practice
- 6 Deliver training that helps embed sustainable recruitment and procurement objectives within The Consultants Agency Ltd
 - Support staff in understanding the impact recruitment and procurement decisions have upon the environment.
 - 4: Work with suppliers to improve the sustainability performance of the supply chain
- 7: Communicate progress to achieve sustainable recruitment and procurement objectives to stakeholders

The Consultants Agency Ltd's Corporate Social Responsibility

Investment in the latest machinery, IT, software and most of all.....PEOPLE

New ideas are welcomed and encouraged

Training our staff

Environmental awareness in all that we do,

Growing organically and responsibly as a company to ensure sustainability

Responsible business practices are adhered to at all times throughout the company

Innovative thinking ensures that we remain focused at all times

Yearly targets are set for continual improvement

We believe that integrating all of the above into a firm and decisive business plan will ensure long term sustainability, whilst having minimal environmental impact and provide our stakeholders with peace of mind and confidence that Corporate Social Responsibility is key to all that we do.

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