

HACKLES & CO

EQUALITY AND DIVERSITY POLICY

OUR COMMITMENT TO FAIRNESS, INCLUSION AND EQUAL TREATMENT
ACROSS OUR OWN TEAM AND OUR RECRUITMENT ACTIVITY

COMPANY POLICY
FOR WEBSITE, CLIENT, CANDIDATE AND INTERNAL USE

DOCUMENT DETAILS

DOCUMENT	Equality and Diversity Policy
COMPANY	Hackles & Co Business Solutions Ltd
VERSION	1.0
EFFECTIVE DATE	24 July 2026
READ ALONGSIDE	Privacy Policy · Terms of Business

CONTENTS

This policy sets out how Hackles & Co Business Solutions Ltd, trading as Hackles & Co, approaches equality, diversity and inclusion. It applies to our own workplace and team, and to our recruitment activity involving candidates, workers, clients and hiring decisions. It reflects our obligations under the Equality Act 2010 and related UK law, and it sits alongside our Privacy Policy and Terms of Business.

01	Policy Statement	09	Workplace Conduct
02	Purpose	10	Bullying, Harassment, Victimisation and Discrimination
03	Scope	11	Reasonable Adjustments
04	Commitment to Equality, Diversity and Inclusion	12	Training and Responsibilities
05	Protected Characteristics	13	Reporting Concerns
06	Recruitment, Selection and Placement	14	Complaints and Breaches
07	Treatment of Candidates and Workers	15	Monitoring and Review
08	Client Instructions and Discriminatory Requests	16	Document Control

AT A GLANCE

Fair decisions. We choose our own team, and assess and place candidates, on merit and on genuine, job-related grounds.

Fair recruitment. We do not act on discriminatory client instructions, and we do not screen candidates on protected characteristics.

Equal footing. We make reasonable adjustments, and we take bullying, harassment, victimisation and discrimination seriously.

IN SHORT

Hackles & Co treats people fairly. We make decisions about our own team, and about candidates, workers and placements, on merit and on genuine job-related grounds, never on the basis of a protected characteristic. We do not act on discriminatory client instructions, we take bullying, harassment, victimisation and discrimination seriously, and we make reasonable adjustments so that people can take part on an equal footing.

SECTION 01

POLICY STATEMENT

Hackles & Co is committed to equality of opportunity and to treating everyone with dignity and respect. We believe that fair treatment is not only the law, it is good practice, good business and simply the right thing to do.

We are committed to a working environment, and a recruitment process, that are free from discrimination, and in which every person is treated fairly and on merit, whatever their background.

We oppose all forms of unlawful and unfair discrimination. We select our own team, and we assess and place candidates and workers, on the basis of ability, suitability, skills, experience and the genuine requirements of the role. We expect the same standard from everyone who works with us and for us, and from the clients we work alongside.

SECTION 02

PURPOSE

The purpose of this policy is to set a clear and consistent standard for equality, diversity and inclusion across everything Hackles & Co does.

This policy is intended to:

- confirm our commitment to fair and equal treatment;
- explain how we meet our responsibilities under the Equality Act 2010 and related UK law;
- make clear what is expected of our team, our candidates, our workers and our clients;
- set out how we handle recruitment, selection and placement fairly;
- explain how concerns can be raised and how they will be dealt with.

This policy is a statement of how we work. It does not form part of any employment contract or contract for services, and we may update it from time to time to keep it current and effective.

SECTION 03

SCOPE

This policy applies across our own workplace and our recruitment activity. It covers how we treat people and how we expect people to treat one another.

It applies to:

- the directors and founders of Hackles & Co;
- any employees and workers;
- temporary and contract workers we place or engage;
- candidates and applicants;
- clients and prospective clients;
- suppliers, partners and providers we work with;
- anyone acting for or on behalf of Hackles & Co.

It applies to every stage of our work, including advertising and sourcing, application and shortlisting, interviews and assessment, offers and placements, day-to-day working, and the way our own team works together. It applies in the workplace and in any setting connected with our work, including meetings, calls, messages, emails, social media and work-related events.

SECTION 04

COMMITMENT TO EQUALITY, DIVERSITY AND INCLUSION

We understand these three ideas in a practical way, and we hold ourselves to each of them.

Equality. Everyone is given fair and equal treatment and equal access to opportunity. Decisions are based on merit and on genuine, job-related reasons.

Diversity. We value the range of backgrounds, experiences and perspectives that people bring, and we believe a fair process reaches the widest pool of talent.

Inclusion. People are treated with respect, can take part on an equal footing, and are able to raise concerns without fear.

In practice, we commit to:

- making decisions on merit and on objective, role-related criteria;
- keeping our recruitment open, transparent and free from bias so far as we reasonably can;
- challenging discrimination, bias and unfair treatment where we see it;
- making reasonable adjustments so that people can take part on an equal footing;
- handling personal information fairly and lawfully, in line with our Privacy Policy.

SECTION 05

PROTECTED CHARACTERISTICS

The Equality Act 2010 protects people from discrimination on the basis of nine protected characteristics. We will not treat any person less favourably, in our own workplace or in our recruitment activity, because of any of them.

The nine protected characteristics are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

The protection also applies where a person is treated unfairly because they are wrongly thought to have a protected characteristic (discrimination by perception), or because of their connection with someone who has one (discrimination by association).

We work to prevent all forms of unlawful conduct under the Act, including:

- **direct discrimination**, treating someone less favourably because of a protected characteristic;
- **indirect discrimination**, applying a provision, criterion or practice that puts people who share a characteristic at a particular disadvantage, unless it can be objectively justified;
- **harassment**, unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment;
- **victimisation**, treating someone badly because they have made or supported a complaint about discrimination, or are believed to have done so.

SECTION 06

RECRUITMENT, SELECTION AND PLACEMENT

Fair recruitment is central to what Hackles & Co does. We assess and place candidates on merit, against the genuine requirements of the role, and we apply the same standard to our own hiring.

In our recruitment, selection and placement work we will:

- base decisions on skills, experience, suitability and the objective requirements of the role;
- write adverts and role descriptions that are inclusive and free from wording that could deter or exclude people because of a protected characteristic;
- use consistent, job-related criteria for shortlisting, interviews and assessment;
- ask only for information that is relevant to the role or required by law;
- consider reasonable adjustments at every stage for disabled applicants and workers;
- keep clear and fair records of the reasons for selection decisions.

Where a role genuinely requires a particular characteristic, this will only be treated as a requirement where the law allows it, for example a genuine occupational requirement, and the basis for it will be recorded. We carry out our recruitment activity in line with the Conduct of Employment Agencies and Employment Businesses Regulations 2003 and the Equality Act 2010.

SECTION 07

TREATMENT OF CANDIDATES AND WORKERS

Everyone we deal with as a candidate or worker can expect to be treated fairly, honestly and with respect throughout their contact with Hackles & Co.

We will:

- give fair and equal consideration to every candidate against the requirements of the role;
- communicate clearly and respectfully, and give honest feedback where we can;
- never send a candidate's details to a client without their agreement for a specific role;
- keep personal information secure and use it only for the purpose it was provided, in line with our Privacy Policy;
- support candidates and workers in raising any concern about fairness or treatment.

Registering with us or being placed by us does not depend on any protected characteristic. It depends on suitability for the work and on a fair assessment of skills and experience.

SECTION 08

CLIENT INSTRUCTIONS AND DISCRIMINATORY REQUESTS

Hackles & Co will not act on any instruction from a client that would involve unlawful discrimination, and we will not filter, restrict or reject candidates on discriminatory grounds.

We will not accept an instruction to exclude or prefer candidates on the basis of a protected characteristic. Where a client asks us to do so, we will explain the position and decline to act on that basis.

If a client makes a request that would be discriminatory, we will:

- explain, professionally and clearly, that we cannot act on it;
- refuse to shortlist, screen out or rank candidates on that basis;
- look for a lawful way to meet the client's genuine business need;
- decline or end the engagement where a client insists on an unlawful approach.

A requirement will only be treated as lawful where it is a genuine occupational requirement or is otherwise permitted by the Equality Act 2010. A client's preference is not a lawful reason to discriminate.

SECTION 09

WORKPLACE CONDUCT

We expect everyone connected with Hackles & Co to help maintain a respectful and inclusive environment.

Everyone is expected to:

- treat colleagues, candidates, workers, clients and suppliers with dignity and respect;
- make decisions and give opinions on fair, job-related grounds;
- avoid language, jokes, images or behaviour that could be offensive or exclusionary;
- be willing to listen, to reflect and to change behaviour where something has caused offence;
- speak up where they see unfair treatment, bias or discrimination.

These standards apply in person and online, including in emails, messages, calls and on social media, and at any work-related event or setting.

SECTION 10

BULLYING, HARASSMENT, VICTIMISATION AND DISCRIMINATION

Bullying, harassment, victimisation and discrimination are not tolerated at Hackles & Co, whether directed at a member of our team, a candidate, a worker, a client or a supplier.

Bullying. Offensive, intimidating, malicious or insulting behaviour, or a misuse of power, that undermines, humiliates or harms a person.

Harassment. Unwanted conduct related to a protected characteristic, or of a sexual nature, that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Victimisation. Treating a person badly because they have raised, supported or are believed to have raised a concern about discrimination or harassment.

Discrimination. Treating a person unfairly, directly or indirectly, because of a protected characteristic.

We take a preventative approach to sexual harassment. In line with the Worker Protection (Amendment of Equality Act 2010) Act 2023, we take reasonable steps to prevent sexual harassment of those who work for us. As a wider company standard, we also take concerns involving clients, candidates, workers, suppliers or members of the public seriously and act where appropriate. Any concern of this kind will be handled promptly and sensitively.

SECTION 11

REASONABLE ADJUSTMENTS

We want disabled candidates, workers and team members to be able to take part on an equal footing. Where a person is placed at a substantial disadvantage because of a disability, we will consider and make reasonable adjustments.

Reasonable adjustments may include:

- adjusting how we communicate;
- providing information in an accessible format;
- allowing extra time in an assessment;
- offering a different interview format or location;
- being flexible about timing;
- working with a client to arrange adjustments for a placement.

We encourage anyone who needs an adjustment to tell us as early as they can, so that we can respond properly. A request will be handled sensitively and any related information will be treated as confidential and used only for that purpose.

SECTION 12

TRAINING AND RESPONSIBILITIES

Equality, diversity and inclusion are the responsibility of everyone connected with Hackles & Co. Clear responsibility helps make sure the policy works in practice.

Responsibilities are shared as follows:

- the directors and founders lead by example, set the standard and make sure this policy is followed and kept up to date;
- everyone who works with or for Hackles & Co is expected to understand this policy, follow it, and treat others fairly;
- anyone involved in recruitment or selection is expected to apply fair, job-related criteria and to be alert to bias;
- everyone is expected to raise concerns about unfair treatment and to cooperate with any review of a concern.

We will give our team appropriate guidance on equality and diversity, keep our own understanding current as the law develops, and seek professional advice where a situation calls for it.

SECTION 13

REPORTING CONCERNS

If you experience or witness discrimination, bullying, harassment or victimisation, or any treatment that seems unfair, we want to know so that we can put it right.

You can raise a concern by:

- speaking to a Hackles & Co director or founder directly; or
- emailing us at contact@hackles.co.uk, marking your message for the attention of the directors.

Where you can, please include what happened, when, who was involved and any witnesses, so that we can look into it properly. Concerns are treated seriously and as confidentially as we reasonably can, and information is shared only with those who need to be involved in resolving the matter. No one will be treated badly for raising a genuine concern or for supporting someone who has. Raising a concern that is deliberately false or made in bad faith may itself be treated as a disciplinary matter.

SECTION 14

COMPLAINTS AND BREACHES

We deal with complaints about equality and diversity fairly, promptly and proportionately. We look into what happened, we listen to those involved, and we take appropriate action.

Depending on the circumstances, action may include:

- an informal resolution where that is appropriate and agreed;
- a fuller review of the concern, with the outcome explained to those involved so far as is appropriate;
- disciplinary action for a member of our team, up to and including dismissal for serious cases;
- ending or declining an engagement with a client, worker or supplier who acts unlawfully or refuses to work fairly;
- steps to prevent the matter happening again.

A breach of this policy is treated seriously. Serious discrimination, harassment or victimisation may amount to gross misconduct. Nothing in this policy removes any legal right a person may have, including the right to bring a claim to an employment tribunal or to contact the Equality and Human Rights Commission or Acas for advice.

SECTION 15

MONITORING AND REVIEW

We keep this policy, and the way we apply it, under review so that it stays current, lawful and effective.

To do this, we will:

- review this policy at least once a year, and sooner where the law or our business changes;
- reflect on our recruitment and selection decisions to check they remain fair and consistent;
- take seriously any concern, complaint or pattern that suggests a problem, and act on it;
- update our wording and practice as guidance from the Equality and Human Rights Commission and Acas develops.

Any information we collect for equality monitoring is handled fairly and lawfully, kept secure, and used only for that purpose, in line with our Privacy Policy and UK data protection law. Providing equality monitoring information is always voluntary.

SECTION 16

DOCUMENT CONTROL

This policy is published and maintained by Hackles & Co. Questions about it can be sent to the contact address below.

REGISTERED COMPANY NAME	Hackles & Co Business Solutions Ltd		
TRADING AS	Hackles & Co		
COMPANY NUMBER	17331210		
ICO REGISTRATION	ZC195115		
CONTACT EMAIL	contact@hackles.co.uk		
READ ALONGSIDE	Hackles & Co Privacy Policy and Terms of Business		
VERSION	DATE	SUMMARY	OWNER
1.0	24 July 2026	First issue	Hackles & Co directors

This policy has been written to reflect the following UK legislation and guidance:

- the Equality Act 2010;
- the Worker Protection (Amendment of Equality Act 2010) Act 2023;
- the Conduct of Employment Agencies and Employment Businesses Regulations 2003;
- guidance published by the Equality and Human Rights Commission and by Acas.

STATUS OF THIS POLICY

This policy is a statement of how Hackles & Co approaches equality and diversity. It is written to reflect the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023 and related UK requirements, and to be read alongside our Privacy Policy and Terms of Business. It is not legal advice. Where a specific situation calls for it, we will seek appropriate professional advice.