

# **Claret Civil Engineering Ltd**

## **Equality, Diversity, and Inclusion Policy**

**September 2025**

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## 1. POLICY STATEMENT

Claret Civil Engineering Limited (Claret CE) is committed to encouraging equality, diversity, and inclusion among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

The organisation - in providing services - is also committed against unlawful discrimination of customers or the public.

The policy's purpose is to:

- provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time
- not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation.
- oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

The organisation commits to:

- Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.  
This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.  
All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public
- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

- Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).

- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy. Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

The equality, diversity and inclusion policy is fully supported by our management team.

Details of the organisation's grievance and disciplinary policies and procedures can be found in the Employee Handbook. This includes with whom an employee should raise a grievance – usually their line manager.

Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.



**A R Gibbons**  
**Managing Director**

## **2. DEFINITIONS**

- 2.1. Equality** – the state of being equal, especially in status, rights, or opportunities.
- 2.2. Diversity** - the state of being diverse. The practice or quality of including or involving people from a range of different social and ethnic backgrounds and of different genders, sexual orientations, etc.
- 2.3. Inclusion** – the practice or policy of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalized, such as those who have physical or mental disabilities and members of other minority groups.
- 2.4. Disability** – a physical or mental condition that limits a person's movements, senses, or activities.
- 2.5. Gender** – either of the two sexes (male and female), especially when considered with reference to social and cultural differences rather than biological ones. The term is also used more broadly to denote a range of identities that do not correspond to established ideas of male and female.
- 2.6. Sexual Harassment** – behaviour characterized by the making of unwelcome and inappropriate sexual remarks or physical advances in the workplace or other professional or social situation.
- 2.7. Homophobia** – dislike of or prejudice against gay people.
- 2.8. Bullying** – the behaviour of a person who hurts or frightens someone smaller or less powerful, often forcing that person to do something they do not want to do:
- 2.9. Victimisation** – the action of singling someone out for cruel or unjust treatment.
- 2.10. Sexual Orientation** – a person's identity in relation to the gender or genders to which they are sexually attracted; the fact of being heterosexual, homosexual, etc.
- 2.11. Religion** – a particular system of faith and worship
- 2.12. Discrimination** - the unjust or prejudicial treatment of different categories of people, especially on the grounds of race, age, sex, or disability.
- 2.13. Protected characteristics** – These are: Age, Disability, Gender reassignment, Marital or civil partnership status, Pregnancy or maternity, Race (which includes colour and ethnic/national origin), Religion or belief, Sex and Sexual orientation.

## **3. SCOPE OF THIS POLICY**

- 3.3** To develop an ethos which respects people and values all people by providing equality, fairness, and respect for all in our employment, whether temporary, part-time, or full-time.
- 3.4** To not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation.
- 3.5** To oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms & conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training, or other developmental opportunities.
- 3.6** To actively advance equality of opportunity and promote good relations amongst our people and those within the community we work.
- 3.7** Eliminate all forms of unfair indirect or direct discrimination, harassment, bullying and victimisation.

## **4. RESPONSIBILITIES**

All relevant individuals have a responsibility under this Policy as follows:

### **4.1. Directors shall:**

Encourage equality, diversity, and inclusion in the workplace.

Create a working environment free of bullying, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities.

Ensure that such acts will be dealt with as misconduct under the organisation's grievance and disciplinary policy, and ensure appropriate action is taken. Serious complaints may amount to gross misconduct and lead to dismissal without notice.

Ensure that this policy is communicated to all staff and ensure it is implemented fairly and consistently.

### **4.2. Line Managers/Supervisors shall:**

Train all employees about their rights and responsibilities under the equality, diversity, and inclusion policy.

Ensure that they implement this policy fairly and seek guidance and support when required.

### **4.3. Claret CE employees shall:**

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation, and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

All employees should conduct themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation, and unlawful discrimination.

They must promote equality & diversity and raise any violation of this to their manager whether they are directly affected or aware of a colleague being targeted.

All employees are responsible for respecting others in their language, behaviours and actions and they must adhere to this policy, non-adherence may lead to disciplinary action.

#### **All employees are instructed that:**

- There should be no discrimination on account of race, colour, religion or belief, nationality, ethnic origin, sex, sexual orientation, gender reassignment, pregnancy or maternity, age, disability, marital status, or sexual preference partner.
- Claret CE will appoint, train, develop and promote based on merit, skills, and ability.

- All employees have personal responsibility for the practical application of the Company's Equality, Diversity, and Inclusion Policy.
- Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination, harassment, bullying or victimisation. Serious breaches of the policy will be treated as Gross Misconduct.

#### **4.4. Customers, Suppliers & Other People not Employed by Claret CE.**

All contractors and sub-contractors should work in line with this policy, ensuring that it is implemented within their contractual agreements and that all personnel are treated fairly.

The Company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by Claret CE.

Employees should report any bullying or harassment by customers, suppliers, visitors, or others to their manager who will take appropriate action.

## **5. THE LAW**

It is unlawful to discriminate directly or indirectly because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion, or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

It is unlawful for an employer to fail to make reasonable adjustments to its requirements, working practices or the physical features of the workplace where these put a disabled employee at a substantial disadvantage. It is also unlawful discrimination where a disabled employee is at a substantial disadvantage due to the employer's unreasonable failure to provide an auxiliary aid or service to the disabled employee.

Staff should not discriminate against or harass a member of the public in the provision of services, goods, or facilities. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation, or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and make reasonable adjustments to address any barriers that may impede disabled people from accessing a service.

## **6. RECRUITMENT, SELECTION AND PROMOTION**

- 6.1.** Recruitment and selection will be undertaken in accordance with the equal opportunities policy. Individuals will be selected on the basis of their relevant merits and ability to perform the job following an open and transparent selection process.
- 6.2.** Person specifications will only include relevant criteria that are required to perform the duties and responsibilities of the post. Where there is a genuine occupational requirement which is justified in accordance with provisions of the Equality Act 2010 e.g. relating to age, sex or race, specific reference will be made to this.
- 6.3.** Where employees have needs (e.g. cultural, religious, disability, or gender based) which may require adjustments to existing workplace practice, consideration will be

given to whether or not it is reasonably practicable to vary or adapt work requirements and/or practice to enable such needs to be met.

- 6.4.** Candidates will be assessed only against clearly identified requirements for the job to avoid judgments on the basis of assumptions, prejudice or stereotypes as per the shortlisting process

## **7. BULLYING AND HARASSMENT AT WORK (Dignity at Work)**

- 7.1.** In the event that bullying and harassment in the workplace were to occur causing a breach of this policy, it will be treated seriously and may be dealt with under the Dignity at work policy and procedure.

## **8. DISCIPLINARY**

- 8.1** We take all allegations of breaches or breaches that we discover very seriously. All allegations and/or suspicions of breach will therefore be thoroughly investigated.
- 8.2** Claret CE will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.
- 8.3** If you wish to complain or raise an allegation of breach (or potential breach) under the policy, you should contact a director or your manager as soon as possible. If you want to take formal action, you will need to follow our grievance procedure and read our policy on harassment and bullying.
- 8.4** However, complaints made in bad faith, for whatever reason (including where this is an attempt to avoid or to deflect disciplinary action), will be treated as misconduct and may lead to a dismissal for gross misconduct.
- 8.5** We will also take prompt disciplinary action against you if we discover that you have harassed or discriminated against anyone else in breach of this policy. If we conclude that your behaviour amounts to gross misconduct, we will be within our rights to dismiss you without notice and with no payment in lieu of that notice

## **9. CONFIDENTIALITY**

- 9.1** Confidentiality will be upheld at all times, whether through discussions, phone calls or email communications.
- 9.2** Anonymity will also be offered if you raise a concern about an employee not complying with this policy as per our Whistleblowing Policy.
- 9.3** Any aspect of a complaint made will always be kept confidential. And only those within the investigation team and any witnesses will be made aware of the minimal facts required to investigate.

## **10. RELATED DOCUMENTS**

- Equality Act 2010
- General Data Protection Regulation 2018
- The Human Rights Act 1998
- Data protection policy



- Dignity at work policy
- Safeguarding policy
- Privacy and Confidentiality policy
- Whistleblowing policy
- Physical and Verbal abuse policy
- Equal Opportunities policy
- Flexible, Home and Hybrid Working policy
- Incident reporting and investigation policy
- Menopause policy
- Mental Health policy
- New and expectant mothers' policy
- Recruitment and safer recruitment policy
- Redundancy policy
- Retirement policy
- Right to work policy
- Sickness policy
- Training and development policy

## 11. DOCUMENT CONTROL

| REVISION AND AMENDMENT REGISTER |             |   |              |                    |
|---------------------------------|-------------|---|--------------|--------------------|
| Date                            | Page number | Revision details  | Issue number | Amendments made by |
| 16/09/24                        |             | Policy statement added<br>Sections 6 & 7 added<br>Types of harassment moved to appendix 1 | 2.0          | Lesley Skingle     |
| 29/9/25                         |             | Date amended. No other changes.   | 2.0          | Sherri Jamieson    |
|                                 |             |   |              |                    |

## **DISCRIMINATION TYPES**

The sorts of actions that would fall into this category of unlawful and prohibited initiatives, include (but aren't limited to) those set out below. These actions need not be intended or directly committed by someone (indirect responsibility may be sufficient for someone to have unlawfully discriminated) and an omission or failure to do something may be just as culpable as a positive action.

We will not tolerate their practice by anyone within Claret CE:

### **Direct discrimination**

When someone with a protected characteristic is treated less favourably than somebody else has or would have been in identical circumstances. An example of this would be where an employee put forward for promotion is rejected on grounds of their racial background. Further examples would be where a pregnant employee, or one with young children, is not promoted.

### **Indirect discrimination**

When a group of people with one of the protected characteristics is disadvantaged by a provision, criterion or practice that is applied to all staff (unless the treatment may be justified for a good business reason). Examples of this would be:

- Insisting, without good reason, that all staff must work full time, (which indirectly discriminates anyone with child or elderly care responsibilities, women in particular)
- Requiring all staff to work onsite and refusing to consider a request to work remotely or under alternative conditions, like flexible hours to avoid commute times, which could disadvantage someone with a disability or a phobia (e.g., someone who suffers claustrophobia or panic attacks on commuting routes).
- Refusing to provide a room for reflection and prayer, which would discriminate against individuals practising certain faiths.
- Dismissing or not employing a woman because she is pregnant or of child-bearing age.

### **Harassment**

Covers hostile, humiliating, degrading, intimidating or similarly offensive treatment or conditions to which an individual with one or more protected characteristics is subjected. Any such actions deprive an individual of their dignity and violate them. We draw no distinction between actions that may be labelled as 'joking or banter' and not intended to cause offence, and those that may have been more direct and premeditated in their delivery. So, for example, in line with legal definitions, reflecting general standards of decency, we will regard any of the following as falling within the definition of harassment:

- Making lewd comments and/or displaying pornographic material.
- Calling someone unkind, derogatory, or otherwise unwelcome names or nicknames.
- Making insensitive jokes, whether about someone directly, or the content of which would be evidently offensive to anyone with a protected characteristic.
- Excluding colleagues and/or making them feel that they have no option but to exclude themselves.

### **Victimisation**

This has a particular meaning under UK employment law, and it is narrower than an ordinary dictionary definition, covering the situation only where:

- A worker has complained of discrimination (or harassment),
- Has supported a fellow worker in making a complaint about these concerns,
- And has then suffered reprisals from others, including those responsible for that worker's employment prospects and working conditions.

### **Other discriminatory actions that are also prohibited**

The UK's employment law also identifies other actions that can be unlawful under the equal opportunity's legislation. Examples of these include:

- Failing to make reasonable adjustments to minimise certain disadvantages suffered by a disabled employee (or job applicant)
- Instructing another person (or applying pressure on them) to discriminate.
- Knowingly assisting somebody else when they carry out a discriminatory act.
- Discriminating against somebody believed to have a protected characteristic, whether or not they actually do, or because they associate with a third party who does.