



Equal Opportunity, Diversity & Harassment Policy

2024 – 2025

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Equal Opportunities, Diversity & Harassment Policy Statement

SG Civil Engineering Ltd (the Company) is committed to an ethos of ensuring an equal opportunity is present at all times, both through recruitment and for all workers in the Company.

The Company's policy shall be to treat all workers and job applicants fairly and equally regardless of their age, colour, disability, ethnic or national origin, marital status, nationality, race, religion, sex, sexual orientation, political affiliation or trade union membership status in accordance with the Equality Act 2010.

In accordance with the Worker Protection Act 2023 the Company shall also take reasonable steps to prevent sexual harassment in the workplace.

In addition, the Company will strive to ensure that workers duties will be imposed without justification, which could disadvantage individuals purely on any of the above grounds.

The policy shall apply to recruitment, selection, pay, promotion, training, transfer and every other aspect of working within the business.

The Company will regularly monitor and review its procedures and selection criteria to ensure that individuals are selected, promoted and otherwise treated according to their relevant individual abilities and merits.

The Company is fully committed to the implementation of this policy and to a programme of action to ensure that the policy is, and continues to be, fully effective.

The overall responsibility for the policy lies with the Directors of the Company, however all workers are required to comply with the policy and to act in accordance with its objectives so as to remove any barriers to both equal opportunities and diversity.

Any act of discrimination by an individual no matter what level, or any failure to comply with the terms of the policy, will result in action being taken either if employed via disciplinary action or if sub-contracted via the internal Red & Yellow Card system.

This policy document will be brought to the attention of all workers and will be reviewed on a regular basis being no less frequently than annually.



S Gallagher
Operations Director
SG Civil Engineering Ltd

21st October 2024

1.0 Scope of the Policy

1.1 This policy is in accordance with relevant legislation concerning discrimination and sets out the Company framework to ensure all individuals are treated equally fairly and with respect no matter to their;

- Gender (inc reassignment)
- Sexual orientation
- Marital or civil partner status
- Race, religion & belief
- Colour, nationality, ethnic or national origin
- Disability, age
- Pregnancy
- Political Affiliation
- Trade Union membership, Fixed-Term or Part-Time status.

All individuals shall be treated fairly and with respect.

1.2 The Policy also applies to the advertising of jobs, recruitment and selection, furthermore, to training and development, opportunities for promotion within the business, to conditions of service, benefits and pay, to health and safety and to individual conduct at work.

1.3 This Policy shall be made available to all workers of the Company to help ensure that there is no unequal treatment of any individual or group within the workplace.

2.0 Responsibilities

2.1 Directors & Managers

The Directors and Managers must set an appropriate standard of behaviour at all times, lead by example, promote the aims and objectives of this policy and ensure that those they manage adhere to the policy.

The Directors and Managers will be given appropriate training on equal opportunities and diversity awareness, including best practice.

2.2 Workers (Operatives) Responsibilities

All Individuals must accept personal responsibility in relation to this Policy and apply the principle of both equal opportunity and diversity to all fellow workers.

Individual workers are to be made aware they personally and the Company could both be found liable for any acts of discrimination within the workplace. If an individual is found to have breached the terms of this policy, they will be liable to disciplinary action or if a sub-contractor via the internal Red & Yellow Card system.

Workers must not discriminate against fellow workers, contractors, job applicants or clients in the course of their work with the Company and are required to draw to the attention of their Line Manager / Supervisor any apparent instance of discrimination.

3.0 Discrimination

3.1 Discrimination may be direct or indirect and it may also occur intentionally or unintentionally

- Direct Discrimination - This is treating an individual less favourably than others on the grounds as listed in the Scope of the Policy above.
- Indirect Discrimination - This is applying a criterion, provision or practice which disadvantages a considerable larger proportion of one group than another which cannot be objectively justified.

4.0 Victimisation

4.1 Discrimination also includes victimisation and bullying.

- Bullying - In conjunction with above this includes any action or behaviour of a physical, verbal or non-verbal nature and may be constituted by persistent behaviour or an isolated incident.
- Victimisation - This is regarded as treating one person less favourably because they have made or intend to make a complaint, allegation, have given or intend to give evidence in relation to a complaint regarding the behaviour of another person.

5.0 Harassment

5.1 Sexual harassment is any unwanted behaviour of a sexual nature that makes someone feel offended, humiliated, or intimidated. It can include but is not limited to:

- Unwelcome sexual advances.
- Inappropriate touching or physical contact.
- Sexual jokes or comments.
- Displaying sexually explicit materials.
- Sending sexually explicit emails or messages.

In accordance with the Worker Protection (Amendment of Quality Act 2010) Act 2023, effective from 26th October 2024, the company has a duty to take reasonable steps to prevent sexual harassment in the workplace. This includes:

- Implementing preventive measures including training and clear communication of this subject matter under the company Equal Opportunities, Diversity & Harassment Policy.
- Creating a culture of respect and inclusion.
- Taking proactive steps to identify and mitigate risks of sexual harassment.

5.2 If you experience or witness sexual harassment, you should follow the procedure laid out in Section 10 of this policy. All complaints will be taken seriously and handled promptly and sensitively. If proven the business will take prompt and effective action.

6.0 Recruitment & Selection

6.1 The Company is committed to recruitment and aims to ensure that no job applicant receives less favourable treatment on any of the unlawful grounds as listed in paragraph 1.1.

6.2 Recruitment procedures will be revised regularly to ensure that individuals are treated based on their relevant merits and abilities and that sufficiently diverse sectors of the

community are reached. Those involved in the recruitment and selection process shall take an unbiased approach at all times and the essential selection criteria identified for all posts shall be objective, non-discriminatory and relevant to the role.

6.3 All recruitment advertisements will comply with this policy, all other relevant legislation and ensure they reach a wide labour market to as to ensure those sections of the local community which may be under-represented in work have the opportunity to apply.

6.4 All recruitment advertisements shall include an appropriate short statement about the Company Equality and Diversity Policy and a copy of this policy shall be available to applicants upon request.

6.5 The selected decisions on candidates shall be based on evidence which relates to the selection criteria and a record of all interviews will be taken with the reasons for selection and rejection of the candidates, feedback will be provided where specifically requested.

7.0 Professional Development & Promotion

7.1 Professional Development

The training and development needs of workers shall be identified through an assessment of both performance and the company's needs, these shall be monitored at all times and made available to individuals again regardless of the unlawful grounds as listed within the Scope.

7.2 Promotion

Advancement with the Company will be dependent on an assessment of individual performance, potential and the availability of positions at a more senior level. These appointments will be made on merit regardless of the unlawful grounds as listed within the Scope.

8.0 Disability Discrimination

8.1 If an individual is disabled or is diagnosed / assessed as being disabled in the course of working with the Company, the said individual is encouraged to inform their Line Manager about their condition, this will allow the Company to give the individual it's full support as possible.

8.2 The Company will make any reasonable adjustments to the individuals working conditions and / or the duties of their job which they may consider to be necessary, or which would assist them in the performance of their duties.

8.3 There may however be circumstances where it may not be reasonable for the Company to accommodate the suggested adjustments, that said the Company will ensure that the individual is provided with information as to the basis of the decision as to the reasons why the adjustments were not feasibly given the circumstances.

8.4 The Company will monitor its premises and work areas to consider whether it places disabled workers, job applicants or others at a disadvantage compared to other workers and where possible the Company will take the required steps to improve the conditions for disabled workers. Where this is undertaken all areas will be risk assessed on an individual basis.

9.0 Part-Time Workers

9.1 The Company will monitor the conditions of service of part-time workers and their progression in the Company to ensure that they are being treated no less favourably than full-time workers.

10.0 Complaints Procedure

10.1 Where this Policy has been breached the Company has a duty to investigate any such breach or complaint, they may receive from any individual who believe they are being discriminated on any of the grounds contained within the Scope of this Policy.

10.2 The complaints investigation procedure will also apply from external sources following two procedural methods;

10.3 Informal Procedure

10.3.1 Where individuals believe they are being discriminated against or harassed they should keep a record of instances of the circumstances. They should record;

- What occurred
- Where and when
- How they felt at the time
- Names of any witnesses

10.3.2 Where possible the individual is to speak to the offender to make it clear that the said behaviour is unacceptable and immediately stop.

10.3.3 Where the individual is unable to raise the issue personally with the offender, it can be raised informally with the Director or Line Manager.

10.3.4 Workers will not be treated less favourably as a result of raising a complaint, if there are found to be false or malicious allegations which have been made this will surmount to a breach of this Policy and may be subject to discipline or if a sub-contractor the Red & Yellow Card system.

10.4 Formal Procedure

10.4.1 Where the informal procedure does not stop the discrimination or harssement, or it is impracticable to follow the informal procedure, the individuals should bring the matter to the attention of the Director or Line Manager.

10.4.2 Where the worker's immediate Line Manager is the person about whom the worker wishes to complain the worker should bring the matter to the attention of the HR Manager.

10.4.3 The formal complaint should be made in writing and contain as a minimum;

- The name of the alleged offender
- Nature of the believed discrimination
- Dates and times when the allegation occurred
- Names of any witnesses

10.4.4 Upon receipt of a formal complaint, the Director or Line Manager will liaise with the HR Manager to investigate the allegation.

10.4.5 If required the Company will ensure that the complainant and the alleged offender do not work together or in the same location until such time as the formal

procedure has reached a conclusion, this could include suspension from work until conclusion.

10.4.6 All individuals involved in the investigation maybe accompanied at the meetings and also must respect the need for confidentiality.

10.4.7 Where the investigation concludes that the complaint is well founded the Company will consider discipline or if a sub-contractor the Red & Yellow Card system.

10.4.8 If the investigation concludes that the complaint is not well founded but has been made in good faith by the individual no action will be taken against the complainant.

10.4.9 Where the investigation concludes that the complaint is not well founded and has not been made in good faith the complainant may be subject to discipline or if a sub-contractor the Red & Yellow Card system and may result in termination.

11.0 Termination of Work

11.1 The Company will monitor termination criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against any individual.

11.2 The Company will also ensure that disciplinary procedures are carried out fairly and equally for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action following the Red & Yellow Card system for sub-contractors.

12.0 Record Keeping

12.1 The Company will monitor this Policy and record any actions undertaken and reasons why, this information shall be available for the Directors, or any external audits as so required ensure confidentiality is maintained at all times.