

1. Introduction

Vaughandale Construction Ltd is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy, and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. The aim is for our workforce to be truly representative of the diversity within our community, and for each employee to feel respected and able to give their best.

This Policy aims to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. The Company is committed to actively opposing all forms of discrimination.

We believe that every employee should come to work safe in the knowledge that should they be subjected to any form of harassment and or victimisation they will have their complaint sympathetically dealt with and thoroughly investigated without fear of reprisal.

Individual or accumulative acts can seriously undermine the dignity, confidence and work satisfaction of others, to such an extent that it has an effect on job performance, confidence, self-esteem, mental health and general wellbeing.

The Company also aims to provide a service that does not discriminate against its clients and customers in how they can access the services and goods supplied by the Company. The Company believes that all employees, workers, clients and suppliers are entitled to be treated with respect and dignity.

All personal data used in connection with this Policy shall be collected, held, and processed in accordance with the Company's Data Protection Policy.

The Company will not tolerate acts and attitudes which breach this policy and all instances of such behaviour or alleged behaviour will be investigated and if proven, subject to the Company disciplinary procedures up to and including dismissal. Each individual employee or worker has a responsibility to ensure they do not breach this policy and also a duty to report to Management any individual who does breach this policy.

2. Definitions

2.1 Discrimination

In this policy 'discrimination' means discrimination where a person is treated less favourably based on their age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation. Discrimination on the grounds of any of these characteristics is illegal

2.2 Types of Discrimination

The four types of discrimination, as outlined by the Equality Act of 2020, include:

- Direct discrimination
- Indirect discrimination
- Harassment, including sexual harassment
- Victimisation

Direct Discrimination

Direct discrimination happens when an employee is being treated or treating another person differently because of a certain disability or underlying reason. There can be multiple reasons, but the most common ones are age, race, religion or beliefs, or sexual orientation.

Direct discrimination also has two additional facets:

Discrimination by association:	Discrimination by perception
Discrimination by association occurs when a person is treated less favourably because they are linked or associated with a protected characteristic. The person does not have the protected characteristic, but they are treated less favourably than others because of a protected characteristic of a friend, spouse, partner, parent, or another person with whom they are associated.	Discrimination by perception happens when a person is discriminated against because they are thought to have a particular protected characteristic when in fact they do not. If you discriminate against people because you think they are disabled or being or their sexual orientation, then they will be protected even if they do not have these protected characteristics.

Indirect Discrimination

This is the application of a policy, criterion, or practice which the employer applies to all employees, but which is such that:

- It is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents.
- The employer cannot justify the need for the application of the policy on a neutral basis; and
- The person to whom the employer is applying it suffers detriment from the application of the policy.

Example: A requirement that all employees must be 6ft tall if that requirement is not justified by the position would indirectly discriminate against employees with an oriental ethnic origin, as they are less likely to be able to fulfil this requirement.

Harassment

Harassment happens when a person experiences uninvited and / or unwanted behaviour from others. This type of behaviour usually violates the dignity of the individual by having them experience intimidation, hostility, degradation, humiliation, or any kind of offensive behaviour. The most common harassment examples would be bullying, having an employee experience unpleasant and derogatory nicknames or having someone ask inappropriate questions. Other forms of harassment might occur through spoken words, banter, written words, images, gestures, mimicry, jokes or pranks, facial expressions and even silence.

Harassment can occur both at work and outside of work in social situations or wherever someone might interact with their colleagues – including through text messages, email, online forums, Whatsapp etc or any social media platform.

Sexual Harassment

There is also a separate form of harassment which specifically relates to behaviour of a sexual nature and the poor treatment of someone because they have been subjected to, or have rejected conduct of a sexual nature. Behaviour can still amount to sexual harassment even where the recipient didn't complain at the time, they didn't ask the person to stop, they appeared to laugh it off, or even if the behaviour wasn't directed at them.

Sexual harassment is not only about physical conduct, it is also about verbal and non-verbal conduct as well. Examples:

Verbal: Comments or jokes about someone's appearance, body, sex life or sexual orientation. Also, inappropriate jokes or comments, wolf-whistling, repeatedly asking someone out after they've said no, using sexual innuendos, foul and obscene language etc.

Non-Verbal: Unwelcome messages, gestures, leering or staring, sharing explicit or obscene images, unwanted text, social media messages or emails, sending or displaying explicit images or videos either within a group or to an individual, inappropriate gestures, body movements and facial expressions etc.

Physical: Unwelcome touching of someone (including their hair), brushing past someone, rubbing shoulders or groping, blocking someone's path in a suggestive or intimidating manner, standing too close to someone / invading their personal space, physical assault, sexual violence or indecent exposure etc.

Victimisation

This occurs when a person becomes the target of harmful behaviour because they made a claim about discrimination, gave evidence about discrimination happening or raised a concern about discriminatory practices.

Bullying

There is no legal definition of bullying and in reality, it can be similar to harassment in the effect that it may have on an individual, however, the focus of the behaviour need not be a protected characteristic.

It is likely to have a negative impact on the victim's confidence, self-esteem and overall wellbeing. Bullying is not necessarily overt and can be done using a number of different methods. It may take place with colleagues in public or in private, at work or socially.

Examples of bullying can include:

- shouting or swearing at someone
- persistent, excessive, unfair, or unjustified criticism
- public humiliation and/or insults
- persistent devaluing of a person's effort
- constant ignoring of opinions.
- withholding necessary information without good reason to cause difficulty or embarrassment to an individual.
- unjustified, excessive monitoring and/or supervision
- setting someone up to fail – for example, setting a target/objective that cannot be achieved.
- constant changing of targets for no justifiable reason.
- unreasonably blocking requests for leave
- aggressive communications
- intimidating or threatening behaviour.

Banter

Behaviour which one person may just see as 'banter' may, to the recipient of that behaviour, may be inappropriate or upsetting. It is the victim's perception of the situation and how they have been made to feel which matters most here.

If someone joins in with banter, they can still claim it's harassment at a later time, as victims sometimes give-in to harassing behaviour to avoid making their situation worse or in the hope that it will stop. The fact that someone joins in with banter does not mean that they are happy about it.

Employees should always be careful that banter is being received in the way it was intended and more importantly that it does not focus on any protected characteristics. Just because someone says that they didn't mean their banter in that way, is not an excuse, for example - an older employee might affectionately be called "old man" and while this might be intended as friendly banter, it could still amount to harassment on grounds of age if it has a negative impact on the victim.

Disability

There are other actions which can be unlawful under equal opportunities legislation which apply specifically to disability:

- Failure to make reasonable adjustments to minimise certain disadvantages suffered by a disabled employee (or job applicant).
- Treating someone less favourably because of something arising from their disability (rather than the disability itself) without a good reason which justifies that treatment.

3. General Statement of Policy

The Company is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants equally.

The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. The Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company.

All employees, Contractors, Sub-Contractors, or other 3rd parties engaged to work with the Company to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination or harassment. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of these equal opportunities and dignity at work statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination.

Employees should draw the attention of their line manager to suspected discriminatory acts or practices or suspected cases of harassment. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's disciplinary procedure.

4. Recruitment, Advertising and Selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of experience, abilities and qualifications. The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable ensure advertisements are not confined to those publications, which would exclude or disproportionately reduce the numbers of applicants of a particular gender, sexual orientation, religion or racial group.

- 1) Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular gender, sexual orientation, religion or racial group or which would exclude disabled job applicants.
- 2) Avoid prescribing any requirements as to marital status.
- 3) Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees of any particular gender, sexual orientation, religion or racial group or from employees with a disability.
- 4) Ensure that the setting of age limits as a criterion of any specific job is justifiable.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing, and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work arrangements or to work premises to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled

5. Training & Promotion

The Company will train all Managers/Foreman in the Company's policy on equal opportunities and in helping them identify discriminatory acts or practices or acts of harassment or bullying. Line managers will be responsible for ensuring they actively promote equal opportunity within the departments for which they are responsible.

The Company will raise awareness to all employees to help them understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment free of bullying and harassment.

Where a promotional system is in operation, it will not be discriminatory, and it will be checked from time to time to assess how it is working in practice. When a group of workers predominantly of one race, religion, sex or sexual orientation or a worker with a disability appears to be excluded from access to promotion and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

6. Terms of Employment, Benefits, Facilities & Services

All terms of employment, benefits, facilities, and service will be reviewed from time to time, to ensure that there is no unlawful discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

7. Equal Pay

The Company is committed to equal pay in employment. It believes that their employees should receive equal pay for like work, work rated as equivalent or work of equal value. To achieve this, the Company will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

8. Reporting Complaints

All allegations of discrimination or harassment will be dealt with seriously, confidentially, and speedily. The Company will not ignore or treat lightly grievances or complaints of discrimination or harassment from members of a particular sex, sexual orientation, religion, or racial group or from employees who are disabled or pregnant.

With cases of harassment, while the Company encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that their behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical.

If you experience Discrimination or Harassment whether from co-workers, customers, visitors, suppliers or other external third parties, you should follow the following steps:

- 1) If you want to try and resolve the problem informally, you should speak to your Line Manager/Foreman. If you do not wish to speak to your Line Manager/Foreman, you can instead speak to another Manger or a Director.
- 2) Alternatively please follow our formal reporting procedure which can be found in our Grievance Policy, and set out below.
- 3) Such reports should be made promptly so that investigation may proceed, and any action taken expeditiously.
- 4) All allegations of harassment will be taken seriously. The allegation will be promptly investigated and, as part of the investigatory process, you will be interviewed and asked to provide a written witness statement setting out the nature and details of the incident or complaint and the basis for it. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation. The Company reserves the right to arrange for another manager to conduct the investigation other than the manager with whom you raised the matter.
- 5) The Company will also invite you to attend at least one meeting at a reasonable time and place at which your complaint can be discussed. You should take all reasonable steps to attend that meeting and you have the right to be accompanied by either a trade union official or a fellow employee of your choice.
- 6) Once the investigation has been completed and after the meeting with you has taken place, you will be informed in writing of the outcome and the Company's conclusions and decision as soon as possible. You will also be notified in writing of your right to appeal against the Company's decision if you are not satisfied with it. The Company is committed to taking

appropriate action with respect to all complaints of discrimination or harassment that are upheld.

- 7) If you wish to appeal against the Company's decision, you must do so in writing within five working days of the Company's decision. On receipt of an appeal, a more senior manager (who may not be the person to whom you addressed your appeal) shall make arrangements to hear your appeal at an appeal meeting. At that meeting you may again, if you wish, be accompanied by either a trade union official or a fellow employee of your choice. You should take all reasonable steps to attend the appeal meeting. Following the meeting, you will be informed in writing of the Company's final decision on your appeal.
- 8) You will not be penalised for raising a complaint of discrimination or harassment even if it is not upheld unless the complaint was both untrue and made in bad faith.

Any employee who is found to have discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under the Company's disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, Line Managers/Foremen who had knowledge that such discrimination or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

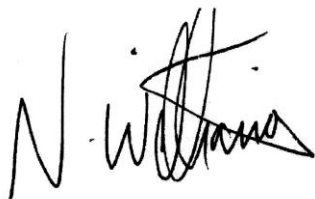
9. Monitoring Equal Opportunity & Dignity at Work

The Company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices.

10. Sub-Contractors

Sub-contractors are under a contractual obligation to honour the Vaughandale construction equal opportunities policy. It is the policy of Vaughandale construction that placement providers who discriminate in terms of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation towards trainees or towards their own employees will have their contract terminated immediately.

For Vaughandale Construction Ltd



Noel Williams
Managing Director

Date	Review
January 2025	January 2026