

EQUALITY, DIVERSITY AND INCLUSION POLICY

POLICY — COMPANY FILE

Recruitment, site conduct and subcontractors — the Equality Act 2010 in plain words

KD-PQ-ED-003 Rev A0

Equality Act 2010: s.4 names the nine protected characteristics; Part 2 Chapter 2 names the conduct the Act prohibits; Part 5 applies it to work — to job applicants and employees (s.39), to harassment of them (s.40), and to contract workers supplied to a principal such as agency and labour-only workers (s.41). Section 40A, in force since 26 October 2024, requires every employer to take reasonable steps to prevent sexual harassment of its employees in the course of their employment. Under s.109 anything an employee does in the course of employment is treated as done by the employer, and it is a defence to show that all reasonable steps were taken to prevent it: this policy, briefed and enforced, is one of those steps — a policy in a drawer is not. Changes passed in 2025 but not in force on 12/09/2026 will make the s.40A duty one to take all reasonable steps, and bar an employer from permitting third parties such as clients and the public to harass its employees; section 4 is written to that standard. The Act forms part of the law of England and Wales and of Scotland; Northern Ireland has its own equality legislation.

1 THE BUSINESS

BUSINESS NAME

COMPANY NO.

PEOPLE EMPLOYED

POLICY DATE

YOUR REV

REGISTERED / TRADING ADDRESS

POLICY OWNER (DAY TO DAY)

REVIEW BY

2 POLICY

This business will not discriminate against, harass or victimise anyone — job applicant, employee, agency or labour-only worker, subcontractor, client, visitor or member of the public — and expects the same of everyone who works on its sites. We recruit, pay, train, promote and treat people on their ability to do the work, and we make reasonable adjustments so that disabled people can do it.

3 WHAT THE LAW PROTECTS, AND WHAT IT PROHIBITS — IN SUMMARY; THE ACT'S OWN WORDS GOVERN

Protected characteristics (s.4): age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

- Direct discrimination (s.13) — treating someone less favourably because of a protected characteristic.
- Discrimination arising from disability (s.15) — treating a disabled person unfavourably because of something arising in consequence of their disability, where that cannot be shown to be a proportionate means of achieving a legitimate aim.
- Gender reassignment discrimination: cases of absence from work (s.16) — treating an absence because of gender reassignment less favourably than an absence for sickness or injury.
- Pregnancy and maternity discrimination: work cases (s.18) — unfavourable treatment, in the protected period, because of a pregnancy or an illness resulting from it, or because a woman is on compulsory maternity leave or is using, has used or sought to use maternity leave. (Section 17 covers pregnancy and maternity outside work — services, premises, education and associations.)
- Indirect discrimination (s.19) — a rule or practice applied to everyone that puts people sharing a protected characteristic at a particular disadvantage, and cannot be shown to be a proportionate means of achieving a legitimate aim.
- Failure to comply with the duty to make reasonable adjustments for disabled persons (ss.20 and 21) — to a rule or practice, a physical feature, or by providing an auxiliary aid.
- Harassment (s.26) — unwanted conduct related to age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, or of a sexual nature, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them; and treating someone less favourably because they rejected or submitted to sexual conduct, or to conduct related to sex or gender reassignment.
- Victimisation (s.27) — subjecting a person to a detriment because they complained, gave evidence or made an allegation under the Act, or because they are believed to have done so or may do so.
- Combined discrimination: dual characteristics (s.14) is written into the Act but has not been brought into force.

4 HOW THE POLICY APPLIES IN THIS BUSINESS

Safety helmets and turbans: Employment Act 1989 s.11 disappplies any requirement to wear a safety helmet to a Sikh at a workplace at any time when he is wearing a turban, and under s.12 a helmet rule applied to him, where there is no reason to think he would not wear the turban, is treated for indirect discrimination as one that cannot be justified. Never refuse a turbaned Sikh work for not wearing a hard hat. For other religious dress, find PPE that works with it before saying no.

RECRUITMENT AND SELECTION

PAY, TRAINING, PROMOTION AND DAY-TO-DAY TREATMENT

ON SITE — CONDUCT, WELFARE AND FACILITIES

AGENCY AND LABOUR-ONLY WORKERS, SUBCONTRACTORS AND SUPPLIERS

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continued

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PREVENTING SEXUAL HARASSMENT — THE REASONABLE STEPS THIS BUSINESS TAKES (S.40A)

5 RAISING A CONCERN

Anyone can raise a concern about discrimination, harassment or victimisation — with their supervisor, or with the named person below if the supervisor is part of the problem. Every concern is recorded, looked into promptly and answered in writing. Nobody is treated less favourably for raising a concern — and subjecting someone to a detriment because they complained of discrimination or harassment under the Act, or gave evidence about it, is victimisation under s.27, unless the allegation was false and made in bad faith.

NAMED PERSON FOR CONCERNS

HOW TO REACH THEM

WHERE CONCERNS ARE RECORDED

COMMITMENTS NOT ADOPTED — NUMBER AND REASON

6 RESPONSIBILITY, COMMUNICATION AND MONITORING

ROLE	NAME	WHAT THEY DO UNDER THIS POLICY

HOW THE POLICY IS COMMUNICATED

HOW IT IS MONITORED, AND WHAT TRIGGERS AN EARLY REVISION

7 SIGNED FOR THE BUSINESS

I adopt this equality, diversity and inclusion policy for the business named in section 1, and I will make sure it is briefed, enforced and kept up to date.

SIGNED — PRINTED NAME

POSITION

SIGNATURE

DATE

REVIEW BY

R REVISION HISTORY

Every revision of this document, and every review that found nothing to change. The revision on the front of this sheet is the one you are holding — check kubitdocs.com for the current one before use.

Rev	Date	Class	What changed	Authorised by
D0	2026-09-12	first-issue	First issue.	— not yet approved —
A0	2026-09-12	review	Approved for issue by the author. Content unchanged from the reviewed draft; the draft status strip is removed. No independent third-party review has been carried out.	Author — director, UK principal contractor, SMSTS. Not an independent review.

Class: first-issue · material (the law, a control, a field or the scope changed — past buyers are notified) · editorial (wording or layout only) · review (checked, nothing changed) · withdrawal. Revision prefix D = draft, not approved and not for sale; A = approved for issue by the person named, on the date shown.