

Equality, diversity and inclusion policy

Respecting and protecting everyone

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MORGAN SINDALL
CONSTRUCTION

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Here, at Morgan Sindall Construction, we want everyone to be able to be themselves at work so they can focus on their job. Of course, this doesn't include any behaviours that would undermine the principles of this policy or involve forcing our thinking onto others.

Equality, diversity and inclusion are critical to our business and the communities we live and work in. It's important that we all work together so we can create the very best place to work where everyone feels valued, is treated fairly and given fair chances to succeed. This means we all have a responsibility to behave in a way that is respectful of others and to understand that our views, opinions and needs may not always be the same as our colleagues.

This policy applies to our directly employed colleagues and anyone else working for us including agency workers, casual workers, self-employed contractors, consultants, summer placements and is relevant to all stages of the employment relationship.

This policy and any related guidance or documentation does not form part of your contract of employment, and it may be amended at any time.

If anyone has any accessibility concerns with this policy for example because English isn't your first language or because of a disability, speak to the HR team.

You can also access this policy on our external website.

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What is equality, diversity, and inclusion (ED&I)?

Having a focus on equality, diversity and inclusion not only helps everyone feel happy and motivated it can also prevent serious and legal issues relating to bullying, harassment and unlawful discrimination. It also supports our **responsible business strategy** and our approach to being an **instinctively inclusive** workplace.

Although equality, diversity and inclusion are often used interchangeably it's important to understand their meanings and differences:

Equality

Equality is about making sure people are treated fairly and given fair chances. Equality doesn't necessarily mean treating everyone the same, rather it means giving everyone an equal opportunity to make the most of their lives and talents recognising that individuals' needs are sometimes best met in different ways to achieve this. The Equality Act 2010 protects people against discrimination at work.

Equity is often spoken of in terms of equality but it's not quite the same thing. Equity is about offering differing levels of support based on individual needs to be successful which is an important element of equality, diversity and inclusion.

Diversity

Diversity recognises that everyone is different in a variety of visible and non-visible ways, and that those differences are to be recognised, respected, valued, promoted, and celebrated. They may include, but are not limited to, differences protected by the Equality Act 2010.

Inclusion

Inclusion is being valued and respected for who you are and enabling different people to thrive. Everyone should feel empowered, have a sense of belonging, feel safe to contribute their ideas and viewpoints and to achieve their full potential. By being inclusive, we are much more likely to see greater diversity in our workforces, fair treatment of everyone and greater equality of opportunities.

Our networks

We think that networks are a positive way to encourage and support everyone and to help create an inclusive environment for all. Employee network groups are not about advocating for priority of the rights of one group over another but a way to raise awareness on important issues that may otherwise not be heard and addressed.

Our regional diversity and inclusion working groups have been set up to support this aim and our Instinctively Inclusive ambitions. If you have any good ideas for the group or would like to join your **D&I representative** would be happy to hear from you.

In addition we have our **Mentoring Network** which can also play an important and valuable role with ED&I as it enables different people, with differing backgrounds and viewpoints to come together to share and learn from each other.

Let's talk about disability

We're proud to be a **Disability Confident Employer.** This means that we are recognised as going the extra mile to make sure that anyone who has a disability is given a fair chance.

We understand that if you have a disability, you might not feel comfortable discussing this with us. You don't have to share anything however we'd encourage you to let your manager or HR team know. It's up to you how much you share, and we won't ask you intrusive questions. Our aim is to focus on the support you need, for example making reasonable adjustments. If there's a health and safety risk to you or to others linked to your disability, you should let your manager or HR know – this is so we can protect everyone.

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The Equality Act 2010

The Equality Act 2010 protects people against unlawful discrimination because of certain protected characteristics. These are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

The main types of discrimination under the Equality Act are:

- Direct discrimination
- Indirect discrimination
- Harassment (including of a sexual nature)
- Victimisation

There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments". For specific information relating to this please click here.

Direct discrimination

Direct discrimination is when you are put at a disadvantage or treated less favourably because of:

- A 'protected characteristic' you have
- A connection you have with someone or a group of people with a relevant protected characteristic (this is called 'discrimination by association')
- A protected characteristic you are thought to have regardless of whether the perception is correct or not (this is called 'discrimination by perception').

An example of direct discrimination could be paying you less because of your sex or because you belong to a particular racial group. You can click here to see examples relating to 'discrimination by association' and 'discrimination by perception'.

'Less favourable' treatment can be anything that puts you at a disadvantage, compared to someone who does not have that protected characteristic even if the less favourable treatment was not intended.

Discrimination by association and discrimination by perception doesn't apply to marriage and civil partnership and pregnancy and maternity however we still won't tolerate any unacceptable behaviour related to this.

Indirect discrimination

Indirect discrimination can be less obvious than direct discrimination. Generally, it occurs when a working practice, policy or rule (including formal or informal practices, decisions and ways of working) is the same for everyone, but it puts those with a certain protected characteristic at a disadvantage.

An example of indirect discrimination could be telling all colleagues that they must work late in the evening. Although applied to everyone, it is likely to adversely affect those employees with childcare responsibilities and these are more likely to be women.

Harassment and sexual harassment

Under the Equality Act there are three types of harassment:

1. Harassment related to certain 'protected characteristics'
2. Sexual harassment
3. Less favourable treatment as a result of harassment related to sex, sexual harassment or gender reassignment

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Harassment related to a protected characteristic

You are protected from harassment related to the following protected characteristics by law; this includes harassment carried out by a third party for example a client, contractor or member of the public:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation.

Harassment related to a protected characteristic is unwanted behaviour which has the purpose or effect of violating your dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

An example of harassment related to a protected characteristic could be if a colleague with a hearing impairment is verbally abused because they wear a hearing aid, this could amount to harassment related to disability.

Whilst the law on harassment doesn't cover marriage and civil partnership or pregnancy and maternity, we consider harassment on any ground to be unacceptable.

Harassment related to a protected characteristic can include if you're perceived to have one (or more) of the relevant protected characteristics or you have a connection with someone who does. And it can also include a situation where someone is known not to have the protected characteristic but nevertheless is subjected to harassment related to that characteristic.

Even where there was no intention to cause offence or the person being harassed hasn't asked for it to stop, the behaviour could still amount to harassment. And it doesn't always have to be aimed at you for it to be considered harassment if what you have experienced has violated your dignity or created an intimidating, hostile, degrading, humiliating or offensive working environment for you.

Unwanted behaviour could be a serious one off incident or repeated behaviour. There can also be circumstances where the behaviour wasn't viewed as unwanted in the earlier stages, but at some point 'oversteps the mark' and becomes unwanted.

Examples of unwanted behaviour can include:

- Offensive remarks about a groups or an individual's race, ethic or national origin
- Repeatedly using the wrong pronouns or name for someone who is trans or non-binary, despite having the correct information
- Ridicule or assumptions based on stereotypes
- Spreading rumours or gossip about someone's sexual orientation or gender
- Making jokes or offensive remarks about someone's disability.

Whilst not an exhaustive list, harassment might take form as:

- Spoken or written words, abuse, imagery, graffiti, gestures, facial expressions, mimicry, jokes, banter, pranks, physical behaviour, gossip, nicknames, intrusive or inappropriate questions and comments.

Sexual harassment

The law requires employers to take all reasonable steps to prevent sexual harassment of workers in the course of their employment. This includes sexual harassment carried out by a third party for example, a client, contractor or member of the public.

Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or effect of violating your dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

It does not need to be related to a protected characteristic. For example, someone who thinks they've been sexually harassed does not need to show it was because of their sex or sexual orientation.

An example of sexual harassment could be a male colleague altering a pornographic image by pasting an image of his female colleague's face on to it. He then sends it to their other colleagues, causing them to ridicule her. There was no sexual motivation behind this act, but the use of the image is sexual in nature.

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Something can still be considered sexual harassment even if the alleged harasser didn't mean for it to be. And it also doesn't have to be intentionally directed at a specific person.

Sexual harassment can be a one-off incident, or an ongoing pattern of behaviour and it can be experienced from someone of the same or a different sex. It can happen in person or in other ways, for example online through things like email, social media or messaging tools. It can include behaviours such as:

- Telling sexually suggestive jokes, comments or innuendo, offensive gestures or whistling
- Unwelcome touching or sexual advances
- Flirting, making sexual remarks about someone's body, clothing or appearance
- Asking questions about someone's sex life or talking about their own
- Making sexual comments or jokes about someone's sexual orientation or gender reassignment
- Displaying or sharing pornographic or sexual images, or other sexual content
- Sexual assault or rape.

We'll take all complaints of sexual harassment seriously – this includes harassment by a third party. We encourage anyone who experiences or who witnesses sexual harassment to report this to us so appropriate steps can be taken. You might report this to your manager, another manager, the HR team or a trusted colleague for example. Sexual harassment is a qualifying disclosure under whistleblowing laws. You can also report your concerns using our Raising Concerns service Safecall. You might want to do this because you feel you can't raise your concerns with any of the people listed above, you wish to remain anonymous, or you still have concerns after raising these internally. Please refer to our **Whistleblowing Policy** for further details on how you can do this.

We'll make sure we handle such issues sensitively and as quickly as possible. Even if your complaint is a long time after an incident took place, we'll still take it seriously and follow the steps detailed in this policy.

If you've been sexually assaulted, we know that this will be distressing, and you might not feel able to tell us. If you can and when you're ready we'd encourage you to report this to us - depending on who you're comfortable sharing this with this might be the HR team, a manager or a trusted colleague. We'll talk to you about what the next steps are. We'll respect your wishes and go along with your decision however if there is a risk to your safety or the safety of others, we may need to take appropriate action – we'll always discuss this with you first.

You might find our **Speaking up** guidance helpful which aims to provide you with further help and support if you have experience or witnessed sexual harassment. We understand that you might also want support outside of work. You can find specialist helplines and support **here.**

Managers and senior leaders should also refer to our guidance **Tackling Sexual Harassment - A Manager's Role**.

Less favourable treatment as a result of harassment

This type of harassment occurs when you experience less favourable treatment because of how you responded to the previous harassment that was either: of a sexual nature, related to sex or related to gender reassignment and it has the purpose or effect of violating your dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. It can apply whether you rejected or 'submitted to' (accepted) the previous harassment.

An example of this type of harassment is a manager propositions one of the employees in his team. She rejects his advances and then is turned down for a promotion which she believes she would have got if she had accepted her boss's advances.

Third party harassment

Third-party harassment is harassment carried out by someone (in the course of your employment) who isn't an employee of the company such as customers, clients, visitors or members of the public. We'll take active steps to prevent third-party harassment, including sexual harassment.

An example of third party harassment might be a third party contractor mocking an employee's disability or a supplier making inappropriate comments of a sexual nature to an employee during contract negotiations.

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Third-party harassment, including sexual harassment will not be tolerated - we'll treat all complaints of third party harassment seriously.

If you have experienced or witnessed third party harassment, please report this to us (using any of the channels already provided in this policy) so we can make sure we take appropriate action and take steps to prevent this from happening again. This could include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other parts of the business.

Victimisation

Victimisation is when someone is treated less favourably as a result of being involved with a discrimination or harassment complaint. It occurs when you suffer a 'detriment' because you have done (or because it is thought that you have done or may do) one of the following things:

- Made a complaint of discrimination or harassment
- Supported someone else's complaint
- Gathered information that might lead to a complaint
- Acted as a witness in a complaint
- Said something or gave evidence that does not support someone else's complaint.

An example of victimisation could be your manager threatening to dismiss you because you intend to support a colleague's sexual harassment claim. This threat could amount to victimisation, even though there hasn't been any action to dismiss you and they may not really intend to do so – the threat is enough.

We want to be clear, that any behaviour which aims to prevent or silence colleagues from calling out discrimination or harassment won't be tolerated. Where this occurs, we will take appropriate action to address this.

Former colleagues are also protected against victimisation where there is a connection to work.

Bullying

Bullying and harassment are distinct concepts which are often confused. Whilst bullying isn't covered under the Equality Act 2010, bullying behaviour can amount to harassment if it's related to certain protected characteristics. Either way we'll treat any complaints of bullying seriously and take appropriate action under our disciplinary policy.

While there is no legal definition of bullying generally it is conduct that is: offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining and/or humiliating.

Bullying can often be an accumulation of many small incidents over a long period of time. It could be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. It may occur at work or outside work.

While this is not an exhaustive list, bullying may include:

- Whispering or gossiping campaigns
- "Picking on", taunting, teasing, or ostracising someone
- Shouting at or humiliating someone, or berating them in public
- Aggressive or excessive unjustified criticism of someone, or setting them up to fail
- Undermining someone's ability to carry out or take credit for their work – e.g., overloading them with menial tasks, taking their work away from them, or stealing or copying their work
- Intentionally blocking a promotion, training, or other career opportunities.

It is important to understand that bullying isn't the same as managing someone's performance or behaviour where there are legitimate concerns. Providing reasonable and constructive criticism of your performance or behaviour in a professional and supportive way, or reasonable instructions given to you in the course of your employment, will not in themselves amount to bullying.

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What you need to know

Harassment, sexual harassment, victimisation and discrimination are unlawful and won't be tolerated.

We want to be clear that bullying, harassing (which includes harassment of a sexual nature), victimising, or unlawfully discriminating against anyone has no place in our business.

We'll treat all complaints seriously taking appropriate steps to address concerns, which may include taking disciplinary action. And, if the issue is serious enough this could be considered as gross misconduct which could lead to dismissal. You should also be aware that you can be personally liable for discrimination and harassment.

It's important that you understand that this policy doesn't just apply during your normal working hours, it includes anything that is done in the 'course of employment'. This means where there is a connection to work for example at a work party/event or through social media. And it can include things that haven't been organised by us, like social gatherings with your colleagues such as leaving drinks after work. Our Work Related Social Events Policy provides further information.

Sometimes this policy may also apply where a situation isn't in the course of employment, but the behaviour concerned is relevant to your suitability to carry out your role or where the incident is so serious it could have an impact on the employment relationship.

It's also important to understand that if you're in a more senior position that factors such as abuse of power over a more junior colleague will be taken into account in deciding what disciplinary action to take.

What we expect from you

We expect everyone to behave appropriately and to take personal responsibility for observing, upholding, promoting, and applying this policy. We expect you to treat anyone you come into contact with in the course of your employment fairly and with dignity and respect, this includes your colleagues and third parties (including clients, customers, suppliers, contractors, agency staff, consultants, visitors, interns, job applicants and members of the public). Any interactions must be free from any form of discrimination, harassment, victimisation or bullying.

We expect you to remember the importance of respectful communication and to be aware that people have different requirements, cultures and customs. Sometimes, this may mean allowing for different viewpoints and making space for others to contribute and participate as well.

If you're at a work-related event, such as a festive party where alcohol is permitted, we trust you'll be responsible and remember to always behave appropriately.

If you're a manager or you're in a senior position or involved in any aspect of the employment relationship for example recruitment or training, you have an ever greater responsibility for modelling the expected behaviours set out in this policy.

Our commitment to you

We are committed to promoting equality of opportunity for everyone and aim to create a workforce that's representative of our society and the communities in which we work.

We want to provide a genuinely inclusive place to work which is based on dignity, trust and respect where we celebrate diversity and embrace the differences and similarities of all our colleagues.

We won't tolerate discrimination, harassment, sexual harassment, victimisation or bullying – this includes third party harassment. If anyone is found to have committed, authorised or condoned an act of discrimination, harassment, sexual harassment, victimisation or bullying, we will take action under our Disciplinary Policy. If the harasser is a third party, we'll make sure we take appropriate action in line with this policy.

We take our additional duties to protect colleagues from sexual harassment seriously. We won't cover up or ignore a sexual harassment complaint or tolerate misuse of power in workplace relationships, for example through seniority or influence. Anyone found to have covered up complaints of sexual harassment may also be subject to action under our disciplinary policy.

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We recognise the importance of taking active steps to promote fairness, respect and inclusivity in the workplace. So, we'll ensure that all our colleagues have a focus on equality, diversity and inclusion and that our managers understand how to manage any issues that may arise in the workplace. We'll do this for example through appropriate training and promoting a working environment based on fairness and equity.

Help, support and wellbeing

We understand that anyone affected by, or involved with, a complaint of bullying, harassment, sexual harassment, victimisation or discrimination may feel anxious or upset and it can sometimes be difficult to decide how you want to deal with it. We'll support you.

We know it's not easy to speak up about these things, but we encourage you to do so. If it's not appropriate or you don't feel comfortable talking to your manager, you should contact your HR team or one of the other channels detailed in this policy.

It might be helpful to talk things through with someone not connected to work. Our **employee assistance programme** provides free confidential support and advice that may help you during a difficult time.

If managers need advice, they should contact the HR team.

Resolving things

If you believe you have been subject to or witnessed behaviour in breach of this policy, then the onus isn't on you to resolve this issue personally. Our aim is to make sure we deal with things in a way that you are most comfortable with.

Informally

Dealing with things informally is often much less stressful and quicker for everyone involved than a formal process. So, if it's appropriate we'd encourage trying to resolve things informally first.

Sometimes you may feel able to raise the issues with the individual themselves explaining how their behaviour makes you feel and to ask them to stop. It's possible that they may not have been aware that their behaviour was offending you.

But if you don't feel able to speak to the person directly or its not appropriate to do so, you don't have to, talk to your manager or the HR team as soon as possible. We can then discuss with you whether resolving your concerns under the informal process detailed in our grievance policy is appropriate or whether the formal process should be followed.

Formally

If you're not happy with the outcome of an informal process, or if you feel it is not appropriate to approach the issue informally, you may decide to raise it formally. To do this you'll need to raise a grievance. Please refer to our **Grievance Policy** for full details.

We'll complete an investigation into bullying or harassment as quickly as possible. If we find evidence, we'll take appropriate action against those involved.

Where the inappropriate behaviour is carried out by a third party, we may need to adjust the procedure to ensure we conduct appropriate investigations, and we'll discuss this with you.

We'll also make sure that we consider any specific sensitivities relating to the complaint, for example if a female colleague has been sexually harassed, she may feel more comfortable talking to female grievance manager.

When we may need to escalate further

We'll always try to respect your wishes when resolving such issues. However, if the welfare or safety of you or others is at risk or where your allegations are particularly serious, the informal approach may not be appropriate and we'll need to investigate things formally, even where you don't agree to this, to ensure the issues can be thoroughly investigated. In such a case we will discuss this with you first and we'll make sure we put in place any support you may need to manage the impact of this decision.

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Some serious acts of harassment can be a criminal offence. Where we believe this may be the case, we'll talk to you about whether you want to report this to the police or not. In most cases we'll support your decision however in certain circumstances we might have to inform the police even where you don't consent to this if we believe there is any risk to your health and safety or that of your colleagues and/or third parties.

Whistleblowing

Whistleblowing (legally known as a 'protected disclosure' or 'making a disclosure in the public interest') is the term used when someone discloses information of malpractice, corruption or illegal acts, damage to the environment, or a breach of health and safety regulations. Sexual harassment is also a qualifying disclosure under whistleblowing laws strengthening protections and ensuring those who speak up against sexual harassment are protected.

If issues are raised which contain both whistleblowing and issues under this policy, we will consider the best way forward. We want to make sure matters are dealt with in a fair and balanced way, what this looks like will depend on the circumstances. You can refer to our Whistleblowing Policy for further information on what whistleblowing is and when it applies.

Confidentiality

We'll deal with any issues and complaints (whether informal or formal) in a sensitive and confidential manner.

Details of the complaint and any investigation, the names of the person(s) making the complaint and the person(s) accused will only be disclosed on a "need to know" basis.

Anyone found to have breached confidentiality or acted without due care could result in disciplinary action up to and including dismissal (or other appropriate action for non-employees).

Disclosure of outcomes

Whilst we'll always make sure we keep you informed of the progress of your complaint this doesn't normally include disclosing the outcome of any disciplinary process that may result from your complaint. However, it certain (limited) cases of sexual harassment there could be circumstances where it is appropriate and necessary to disclose what action has been taken to address your complaint. This won't apply in every case and what's appropriate and necessary will depend on the individual circumstances; and so, we'll need to consider this on a case by case basis ensuring that we have also considered our obligations to the person the complaint is about.

Calling out unacceptable behaviour

It can be difficult to call out unacceptable behaviour but if you have witnessed bullying, harassment sexual harassment, victimisation, or discrimination we'd encourage you to report this.

If you can, speak to the person to who the negative behaviour is directed towards and ask them what support they need.

If you feel comfortable and it's safe to do so you could step in if you see any unacceptable behaviour happening however, we appreciate that this is not always easy or appropriate under the circumstances.

If you have seen or witnessed something that makes you feel uncomfortable or something that goes against our approach to being inclusive, and you don't feel comfortable speaking out, please raise this with the HR team.

If you're a manager and you witness or are informed of such behaviour you have a responsibility to address this in line with this policy.

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Expressing personal beliefs at work

We understand that everyone will have their own personal views, values and beliefs and that at times they might clash with the views and beliefs of others.

It's ok to have different views and to discuss them at work. However, this does not mean that you can express your views in any manner you choose - respectful dialogue is important and behaviour must never cross the line into discrimination and harassment even when differing views are in conflict. The law is clear that one protected characteristic does not override the rights of another.

Whilst everyone has the right to their own views it's important to understand that the Equality Act doesn't protect every view or belief expressed in the workplace. For example, beliefs which are incompatible with human dignity or the rights of others such as 'racial superiority'.

If you're unsure whether your views or comments could cross the line, you should seek guidance from your local HR contact.

Social media

If you put potentially offensive or inappropriate comments or images about or directed at colleagues or customers on social media sites, we'll take this seriously and investigate it in line with this policy. There's more information in the Group social media policy.

Data and record-keeping

We want to make sure we do the right thing for our people and understanding the diversity of our workforce is essential to help us make the right decisions, as this information helps us understand if action is needed. For example, it can tell us if some groups are underrepresented or not promoted at the same rate as other groups or whether any diversity initiatives are having an impact or not. It can also help us keep you safe at work for example if you tell us, you have a disability, we'll look at what reasonable adjustments might be necessary.

You don't have to give us information if you prefer not to but if you do, we'll make sure that any information you give us is treated confidentially and in line with Data Protection requirements.

External support sources

We want to make sure you get the support you need. Below provides further details on external support resources that you may find useful:

Organisation	Information	How to access
Equality Advisory and Support Service	A helpline service that advises and assists individuals on issues relating to equality and human rights	Click here
Protect (the whistleblowing charity)	Whistleblowing charity providing free and confidential advice line to support anyone who has seen malpractice, risk or wrongdoing in the workplace Protect is the UK's	Click here
Citizen's advice	A national charity which networks with other local charities to offer free confidential advice online, over the phone, and in person.	Click here
ACAS	The Advisory, Conciliation and Arbitration Service is an independent public body that gives employees and employers free, impartial advice on workplace rights, rules and best practice.	Click here

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We take all complaints from colleagues raising concerns in good faith seriously. In the unlikely event that it's found that a malicious or vexatious complaint has been made where it was known not to be true, we may take action under the disciplinary policy. No-one will be subjected to disciplinary action or to any other detriment simply because their complaint is not upheld.

We want to make sure everyone gets the help and support they need during different stages of their life and their career with us. If you're unsure about any part of this policy, talk to your manager or your HR team.