

BRADFORD WATTS

DIVERSITY AND INCLUSION (D&I) POLICY

POLICY STATEMENT:

Bradford Watts Ltd is committed to an inclusive, respectful workplace where everyone can do their best work. We do not tolerate discrimination, harassment, bullying or victimisation. We will take proactive, reasonable steps to prevent sexual harassment and to foster dignity at work for all.

PURPOSE:

- Set standards for inclusive behaviour, management, recruitment and supply chains.
- Meet our legal duties under UK equality and employment law.
- Explain how to raise concerns and how we will respond.

SCOPE:

This policy covers recruitment and onboarding, training, pay and benefits, site and office working, promotion, performance management, discipline and grievance, termination, agency labour and all site visitors/third parties.

OUR LEGAL DUTIES:

- Equality Act 2010 – prohibits discrimination, harassment and victimisation in employment based on nine protected characteristics: age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation. Also includes the duty to make reasonable adjustments for disabled people and equal pay provisions.
- Worker Protection (Amendment of Equality Act 2010) Act 2023 – imposes a positive duty on employers to take reasonable steps to prevent sexual harassment (in force from 26 Oct 2024).
- ACAS Code of Practice (Disciplinary & Grievance) – we follow the Code when handling complaints.
- Public Interest Disclosure Act 1998 (PIDA) – protects workers who whistleblow in the public interest (no detriment or dismissal).
- Employment Relations (Flexible Working) Act 2023 and related regulations – day-one right to request flexible working from 6 Apr 2024; we will consult before rejecting.
- Gender Pay Gap Information Regulations 2017 – if we have 250+ employees, we publish annual gender pay gap data.

Version:	08
Created:	11/02/2026
Review Date:	11/02/2027

- Part-time Workers (2000), Fixed-term Employees (2002), Agency Workers (2010) – protect these workers from less favourable treatment and require parity after qualifying periods.
- Data protection (UK GDPR & Data Protection Act 2018) – governs any D&I or monitoring data, including special category data (e.g., ethnicity, health). Where we rely on the “equality of opportunity or treatment” condition we will keep an Appropriate Policy Document (APD).

This policy should be read alongside our Anti-Bullying and Harassment, Whistleblowing, Grievance and Disciplinary, Recruitment and Selection, Flexible Working, Data Protection and Modern Slavery policies.

DEFINITIONS:

- Discrimination: treating someone worse because of a protected characteristic, including indirect discrimination and discrimination by association or perception.
- Harassment: unwanted conduct related to a protected characteristic that violates dignity or creates a hostile environment; sexual harassment includes any unwanted sexual conduct.
- Victimisation: a detriment because someone made or supported an Equality Act complaint (a “protected act”).
- Reasonable adjustments: changes to remove substantial disadvantage for a disabled person.

RESPONSIBILITIES:

- Board/MD: Own this policy; resource D&I plans; review metrics; sign the annual statement.
- Directors and Managers: Lead by example; complete D&I and anti-harassment training; manage concerns promptly and fairly under ACAS principles.
- Supervisors/Site Managers: Ensure inclusive site set-up (PPE, welfare, signage, inductions), intervene early on behaviour, and escalate issues.
- All workers (including subcontractors/agency): Follow the policy, complete inductions, challenge unacceptable behaviour, and report concerns.
- HR/SHEQ: Maintain procedures, training, records, monitoring and the APD for any D&I data.

INCLUSIVE BEHAVIOURS (WHAT “GOOD” LOOKS LIKE):

- Speak and act respectfully; zero tolerance for slurs, offensive “banter”, intimidation or exclusion.
- Use by-name introductions and clear instructions in site briefings; provide translated or visual materials where needed.
- Offer inclusive PPE sizing; consider religious clothing and hair; provide private changing/faith-prayer space where reasonably practicable.
- Provide reasonable adjustments (e.g., modified duties, accessible routes, hearing protection compatibility, alternative assessments, neuro-inclusive briefings).

Version:	08
Created:	11/02/2026
Review Date:	11/02/2027

RECRUITMENT, SELECTION AND PROMOTION:

- Job design and adverts must be neutral and non-discriminatory; avoid unnecessary criteria (“recent graduate”, “native English”) unless objectively required.
- Use structured interviews, skills-based tasks and scoring matrices; keep records.
- Positive action may be used lawfully to overcome disadvantage or under-representation (ss.158–159 Equality Act) where proportionate; tiebreaker only where candidates are equally qualified and criteria are pre-stated.
- Agency and labour-only subcontractors must comply with this policy and statutory parity rules.

PAY, TERMS AND PROGRESSION:

- We ensure equal pay for equal work and review job evaluation/grades to prevent sex-based disparities.
- Part-time, fixed-term and agency workers will not be treated less favourably than comparable workers, subject to the law.

FLEXIBLE WORKING AND WORK-LIFE BALANCE:

- All employees have a day-one right to request flexible working; managers will consult before rejecting and respond within statutory timescales.
- We will consider site-feasible options (e.g., adjusted start/finish times, rostering, compressed hours, part-time roles, task re-allocation).

PREVENTING BULLYING, HARASSMENT AND SEXUAL HARASSMENT:

- We will take reasonable steps to prevent harassment, including risk assessment of hotspots (sites, travel, client premises), clear standards for third-party behaviour, visible reporting routes, and regular training/refreshers.
- Managers must act on any concern, even if informal. We will support those who speak up and take disciplinary action where appropriate (up to dismissal).

SPEAKING UP (CONCERNS AND COMPLAINTS):

- Informal options: speak with a manager, HR, or a D&I Champion.
- Formal options: raise a grievance; we will follow the ACAS Code.
- Whistleblowing: If the matter is in the public interest (e.g., health & safety, unlawful acts), you are protected under PIDA; you can report internally or to a prescribed person without detriment.
- Victimisation is unlawful. Retaliation for raising or supporting a complaint will result in disciplinary action.

Version:	08
Created:	11/02/2026
Review Date:	11/02/2027

DATA PROTECTION AND D&I MONITORING:

- Any voluntary diversity monitoring or equal-opportunities data we collect will be purpose-limited, minimised, and protected under UK GDPR/DPA 2018.
- Where we process special category data for equality monitoring, we rely (where appropriate) on DPA 2018, Schedule 1, Part 2, para 8 (equality of opportunity or treatment) and maintain an Appropriate Policy Document (APD) with retention/erasure safeguards. Participation is always optional.

TRAINING AND COMMUNICATION:

- Mandatory at induction and annual refreshers: Equality Act basics, bystander skills, anti-harassment, reporting routes, and inclusive site supervision.
- Manager modules: investigations, reasonable adjustments, flexible working requests, and positive action.
- Toolbox talks aligned to project risks (e.g., welfare facilities for mixed-gender crews, inclusive PPE).

SITES, WELFARE AND PRACTICAL INCLUSION:

- Provide suitable welfare (including sanitary and private changing facilities), consider prayer space where practicable, and ensure signage/inductions are accessible (visuals, plain English, translations where needed).
- Ensure PPE is available in a range of sizes and designs (e.g., maternity-fit, religious accommodations) and that adjustments are promptly sourced.
- Plan for accessible routes and task allocation; capture adjustments in RAMS/POWRA where relevant.

SUPPLIERS AND SUBCONTRACTORS:

- Pre-qualification will assess D&I and anti-harassment standards. Contracts will require compliance with Equality Act duties and this policy; breaches may result in removal from site or termination.

MONITORING, OBJECTIVES AND REVIEW:

- Annual D&I objectives and site-level actions (e.g., inclusive recruitment outreach, supervisor training coverage).
- Where lawful and proportionate, we will monitor workforce composition and recruitment outcomes to spot barriers and track progress; results will inform our action plan.
- This policy will be reviewed annually (or sooner after legislative changes) and updates communicated to all workers.

Version:	08
Created:	11/02/2026
Review Date:	11/02/2027

CONSEQUENCES OF BREACH:

Breaches of this policy may be treated as misconduct or gross misconduct under our Disciplinary Procedure, up to and including dismissal and removal from site. Third-party misconduct will be escalated to the employer/client and may result in site access being withdrawn.

KEY LEGAL REFERENCES (NON-EXHAUSTIVE)

- Equality Act 2010 (protected characteristics; harassment; victimisation; reasonable adjustments; equal pay).
- Worker Protection (Amendment of Equality Act 2010) Act 2023 – employer duty to prevent sexual harassment (from 26 Oct 2024).
- ACAS Code of Practice on Disciplinary and Grievance Procedures.
- PIDA 1998 & ACAS guidance on whistleblowing.
- Employment Relations (Flexible Working) Act 2023 and Commencement Regs (SI 2024/438) – day-one right to request; duty to consult before rejecting.
- Gender Pay Gap Information Regulations 2017 – 250+ employees.
- Part-time Workers Regs 2000; Fixed-term Employees Regs 2002; Agency Workers Regs 2010.
- UK GDPR and Data Protection Act 2018 – Schedule 1, Part 2, para 8 condition for equality monitoring; APD requirement.
- EHRC guidance – protected characteristics; harassment and sexual harassment technical guidance; discriminatory adverts.

F. Pimley: SHEQ Manager

Date: 11/02/2026



Version:	08
Created:	11/02/2026
Review Date:	11/02/2027