

## Equal Opportunities and Diversity Policy

### Policy statement

Capital Sky Ltd is committed to providing a working environment that promotes equality of opportunity, values diversity, and ensures freedom from unlawful discrimination. No employee, worker, subcontractor, consultant, applicant, or client will receive less favourable treatment on the grounds of race, colour, nationality, ethnic origin, gender, gender reassignment, marital or civil partnership status, disability, age, religion or belief, or sexual orientation.

Capital Sky Ltd actively opposes all forms of discrimination, harassment, and victimisation. We aim to ensure that all individuals are treated with dignity, respect, and fairness in every aspect of employment and service delivery in accordance with the [Equality Act 2010](#), provisions relating to protected characteristics, harassment, and victimisation, including harassment related to a protected characteristic and third-party harassment where applicable in the workplace or on client sites.

This policy supports compliance with the [Equality Act 2010](#), relevant Codes of Practice, and the wider commitments of our Integrated Management System (IMS).

### Objectives of this policy

Capital Sky Ltd aims to:

- prevent, reduce, and eliminate all forms of unlawful discrimination
- ensure recruitment, promotion, training, development, assessment, and redundancy decisions are based solely on capability, qualifications, experience, skills, and performance
- ensure services are delivered in a manner that is fair, accessible, and non-discriminatory
- promote a culture where diversity is valued and equality is embedded in everyday practice
- ensure fair, transparent, and consistent recruitment, selection, and employment practices based on competence, skills, and business need
- ensure decisions are free from bias, including unconscious bias, and are supported by objective and documented criteria where appropriate

### Designated officer

**Name:** Tracey Heneghan

**Position:** Operations Director / Designated Officer

**Telephone:** 01582 488277

### Definition of discrimination

Discrimination is unequal or differential treatment that results in a person being treated more or less favourably than others in similar circumstances because of a protected characteristic. Discrimination may be direct or indirect.

Direct discrimination occurs when a person is intentionally treated less favourably because of a protected characteristic. These are legally protected personal attributes, as defined by the Act, which must not be used as a basis for unfair treatment.

Indirect discrimination occurs when a policy, criterion, or practice applies to everyone but disproportionately disadvantages a particular group and cannot be objectively justified.

Protected characteristics are defined under the [Equality Act 2010](#).

## **Unlawful reasons for discrimination**

It is unlawful to treat a person less favourably because of their gender or marital status, including gender reassignment. Sexual harassment of any kind may constitute discrimination.

It is unlawful to discriminate on the grounds of age. This applies to people of all ages.

It is unlawful to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to ensure equal access to employment, training, and promotion.

It is unlawful to discriminate on the grounds of race, colour, nationality, or ethnic origin.

It is unlawful to discriminate on the grounds of sexual orientation.

It is unlawful to discriminate on the grounds of religion or belief.

## **Reasonable adjustments**

Capital Sky Ltd has a duty to make reasonable adjustments to support disabled employees and applicants in accordance with its legal obligations under the [Equality Act 2010](#). Adjustments may include changes to premises, reallocating duties, transferring to a more suitable role, altering working hours, providing additional training or mentoring, supplying modified equipment or documentation, or any other adjustment considered reasonable and necessary within the company's resources.

Employees who believe adjustments may be required should contact the Designated Officer.

## **Responsibility for implementation**

The success of this policy relies on the cooperation of all employees. Senior management holds overall responsibility for ensuring compliance with legislation and Codes of Practice. Managers are expected to follow this policy and ensure that employees, subcontractors, and agents do the same.

All employees, subcontractors, and agents must act in a way that does not subject others to direct or indirect discrimination. Individuals may be held personally liable for discriminatory acts.

Recruitment, selection, training, promotion, and performance management decisions will be based on objective, non-discriminatory criteria and documented where appropriate to ensure transparency, fairness, and auditability of decision-making processes.

## **Acting on discriminatory behaviour**

Any employee who is the subject of, witness to, or accused of discriminatory behaviour should refer to the company's disciplinary and grievance procedures. All concerns will be taken seriously and handled sensitively.

Any form of harassment or victimisation relating to protected characteristics will be treated as a disciplinary matter and may result in dismissal. This includes harassment by colleagues, management, subcontractors, or third parties whilst undertaking work on behalf of the company.

Employees are encouraged to report concerns through their line manager, senior management, or where appropriate via the company's Whistleblowing Policy if the matter is sensitive or involves management.

## Advice and support

Employees may seek advice from their employee representative or trade union where applicable.

External support is available from:

Equality and Human Rights Commission Website: [www.equalityhumanrights.com](http://www.equalityhumanrights.com)

Citizens Advice Bureau Website: [www.citizensadvice.org.uk](http://www.citizensadvice.org.uk)

ACAS (Advisory, Conciliation and Arbitration Service): [www.acas.org.uk](http://www.acas.org.uk)

## Extent of the policy

This policy applies to recruitment, selection, training, appraisal, development, promotion, and all aspects of employment. It also applies to the provision of goods and services in a manner consistent with the principles of this policy.

It extends to all workplace environments, including client sites, construction sites, and interactions with subcontractors, suppliers, and other third parties engaged in business activities on behalf of Capital Sky Ltd.

**Name: Martin Maloney**

**Position: Chief Executive Officer**

**Signature:**



**Dated: 15/05/2026**

**Latest Review Date: 15/05/2027**