The Steadfast Security Group

Equality, Diversity & Inclusion Policy

1 Hackworth Road,
Northwest Industrial Estate
Peterlee
County Durham
SR8 2JQ

Tel: 0191 518 0837
Email: contact@steadfastsecurity.co.uk
Web: www.steadfastsecurity.co.uk

SSG.I.0049

GENERAL INFORMATION			
Organisation:	**Steadfast Security Group**		
Version:	**01**	**Document Owner:**	**HR Manager**
Issue Date:	**02 October 2025**	**Next Review:**	**02 October 2028**
Email Address:	**personnel@steadfastsecurity.co.uk**	**Tel Number:**	**0191 518 0837**

AMENDMENTS				
Ser No	**Section**	**Reason for Amendment**	**Amended By**	**Date**

REVIEWS				
Ser No	**Date**	**Reason for Review**	**Reviewed By**	**Next Review**

SCOPE

1. Steadfast Security Group, comprising Steadfast Security Solutions Limited, Steadfast Security Systems Limited, Steadfast Secure Storage Limited, and Complete Security (Europe) Limited, is committed to promoting equality, diversity, and inclusion within its workforce and eliminating unlawful discrimination. Our goal is to build a team that reflects the diversity of the communities and customers we serve, where every individual feels respected, valued, and empowered to perform at their best. This commitment extends to the way we deliver goods, services, and facilities, ensuring fair treatment for all customers and members of the public. In alignment with the Equality Act 2010, we support a society where everyone can reach their full potential free from prejudice, where human rights are respected and protected, and where dignity, equal opportunity, and mutual respect are upheld through a shared appreciation of diversity and equality.

KEY LEGISLATION

2. **Equality Act 2010:** The Equality Act 2010 consolidates over 116 previous pieces of legislation into a single framework to protect individuals from discrimination and promote equality. It covers **nine protected characteristics**: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The Act prohibits direct and indirect discrimination, harassment, and victimisation in employment, services, and public functions. It also imposes a **Public Sector Equality Duty** requiring organisations to eliminate discrimination, advance equality of opportunity, and foster good relations.

3. **Human Rights Act 1998:** This Act incorporates the European Convention on Human Rights into UK law, ensuring fundamental rights such as the right to life, liberty, privacy, and freedom from discrimination. It underpins EDI policies by requiring organisations to respect and protect human rights in all activities, including employment and service delivery.

4. **Equal Pay Act 1970 (now part of Equality Act):** Introduced the principle of equal pay for equal work between men and women. This requirement continues under the Equality Act, ensuring pay transparency and fairness.

5. **Equality and Human Rights Commission (EHRC) Codes of Practice:** The EHRC provides statutory guidance and codes of practice on implementing the Equality Act. These documents help organisations interpret legal obligations and apply them in everyday situations, supporting compliance and best practice in EDI.

ROLES AND RESPONSIBILITIES

6. **Board of Directors:** The Board of Directors holds ultimate accountability for promoting equality, diversity, and inclusion (EDI) across the organisation. They set the strategic direction, approve the EDI policy, and ensure that adequate resources are allocated to implement and maintain it. The Board monitors compliance with legal and regulatory requirements, reviews progress against EDI objectives, and champions a culture of fairness and respect throughout the organisation.

7. **Senior Management:** Senior Management is responsible for embedding EDI principles into organisational strategy and operations. They ensure that policies are implemented effectively, lead by example, and create an inclusive environment where diversity is valued. Senior Management also monitors departmental compliance, addresses systemic barriers, and reports progress to the Board.

8. **Chief Compliance Officer (CCO):** The Chief Compliance Officer oversees adherence to EDI legislation and internal policies. They provide guidance on compliance requirements, monitor risks related to discrimination or inequality, and coordinate audits and reviews. The CCO ensures that corrective actions are taken promptly and acts as the key point of contact for regulatory bodies on EDI matters.

9. **HR Manager:** The HR Manager plays a central role in implementing EDI within recruitment, training, and employee relations. They ensure fair and transparent hiring practices, manage diversity training programmes, and address grievances related to discrimination or harassment. The HR Manager also monitors workforce diversity metrics and supports initiatives that foster inclusion.

10. **Departmental Managers:** Departmental Managers are responsible for promoting EDI within their teams. They ensure that staff understand and comply with the policy, provide equal opportunities for development, and address any

discriminatory behaviour promptly. Managers should lead inclusively and encourage a culture of respect and collaboration.

11. **Employees:** Employees are expected to uphold EDI principles in their daily work. They must treat colleagues, clients, and suppliers with respect, avoid discriminatory behaviour, and report any concerns or breaches of policy. Employees also play an active role in fostering an inclusive workplace by embracing diversity and supporting organisational initiatives.

12. **Clients:** Clients are expected to engage with Steadfast in a manner that respects the organisation's EDI values. They should avoid discriminatory behaviour and cooperate with any measures designed to promote equality and inclusion within service delivery.

13. **Suppliers:** Suppliers must comply with Steadfast's EDI standards and demonstrate fair and inclusive practices within their own operations. They are expected to avoid discrimination, provide equal opportunities, and support Steadfast's commitment to diversity throughout the supply chain.

14. **Visitors:** Visitors to Steadfast premises are required to respect the organisation's EDI principles. They should conduct themselves appropriately, avoid discriminatory behaviour, and follow any guidance provided to maintain a safe and inclusive environment.

OUR POLICY'S PURPOSE

15. The purpose of this policy is to unify and guide Steadfast's approach to equality and diversity across the organisation, ensuring that all staff are treated fairly and that every learner has the opportunity to reach their full potential. It sets out our commitment to providing equality, fairness, and respect for all employees, whether temporary, part-time, or full-time, and to eliminating unlawful discrimination in line with the Equality Act 2010. This includes protection against discrimination based on **age**, **disability**, **gender reassignment**, **marriage** and **civil partnership**, **pregnancy** and **maternity**, **race**, **religion** or **belief**, **sex**, and **sexual orientation**.

16. Steadfast opposes all forms of unlawful discrimination in areas such as pay, employment terms, grievance and disciplinary procedures, dismissal, redundancy, parental leave, flexible working requests, and access to training, promotion, and development opportunities.

OUR COMMITMENTS

17. Steadfast is committed to fostering a workplace culture that embraces equality, diversity, and inclusion as both best practice and sound business strategy. We strive to create an environment free from bullying, harassment, victimisation, and unlawful discrimination, where dignity and respect are upheld, and individual differences are valued. All staff, including contractors, are expected to understand and uphold their responsibilities under this policy, recognising that both employees and the organisation can be held accountable for discriminatory behaviour.

18. Complaints of misconduct, including harassment or discrimination, will be taken seriously and addressed through appropriate grievance or disciplinary procedures, with severe cases potentially leading to dismissal. We also ensure equal access to training, development, and progression opportunities, with decisions based on merit, except where lawful exemptions apply.

19. Our employment practices are regularly reviewed to maintain fairness and reflect legal updates. Additionally, we monitor workforce demographics, such as age, sex, ethnicity, disability, religion, and sexual orientation, to assess the effectiveness of our equality, diversity, and inclusion efforts, and we review our policy and action plans annually to identify and address any emerging issues.

PERSONAL DIGNITY

20. It is a violation for any individual to engage in unwanted behaviour that causes another person to feel their dignity has been undermined or violated. This includes actions that create an intimidating, hostile, degrading, humiliating, or

offensive environment. Everyone has the right to work and interact in settings where they feel respected and safe from harassment or inappropriate conduct.

HUMAN RIGHTS

21. Steadfast firmly believes in upholding human rights for everyone connected to the organisation and for all members of society. We are committed to ensuring that no action taken by anyone within Steadfast undermines an individual's contribution to society or the organisation, nor causes a loss of self-respect or respect from others.

22. In all our activities, we will fully comply with both the letter and the spirit of relevant laws, directives, and agreements. This includes a strong commitment to fulfilling all regulations and legislative requirements that impact our role in vocational training and broader organisational responsibilities.

HARASSMENT AND BULLYING

23. Harassment is an unacceptable form of behaviour, and Steadfast is committed to protecting all staff and learners from such conduct, whether it occurs on company premises, at work placements, or during any work-related activity, even outside of regular working hours. This policy applies universally, regardless of whether a separate policy exists at a learner's placement or workplace. Any incidents of harassment must be reported without hesitation or fear of reprisal.

24. Learners receiving government-funded training are afforded additional protection under Steadfast's duty of care. We take all reports of harassment seriously and will act promptly to ensure a safe, respectful, and inclusive environment for everyone involved with the organisation.

WHAT IS HARASSMENT?

25. Harassment refers to any unwelcome or inappropriate behaviour that negatively affects an individual's quality of life or work. It includes;

a. Repeated or isolated acts such as bullying

b. Verbal or physical abuse

c. Ill-treatment

d. Defamatory remarks

e. Any conduct that creates an intimidating, hostile, degrading, or offensive environment. This may also involve inappropriate comments or actions related to a person's sex, sexual orientation, gender identity, religion or belief, race, disability, age, or marital status.

f. Abuse of authority, particularly by staff towards learners or colleagues, is strictly prohibited. Being under the influence of alcohol will be considered an aggravating factor and not a justification for such behaviour.

g. Sexual harassment, legally defined, includes demeaning comments about appearance, indecent remarks, intrusive questions about one's sex life, sexual advances, or any conduct of a sexual nature that creates a hostile or humiliating environment. This also includes the display or downloading of offensive material in the workplace or during vocational training.

HARASSING ASPECTS OF POTENTIALLY OFFENSIVE DISPLAYED GRAPHIC MATERIALS

26. At Steadfast, we maintain a **zero-tolerance approach** to the display of graphic materials that may be offensive or inappropriate. It is not acceptable to assume that because one individual is not offended, others must tolerate such content. No one should be placed in a position where they feel compelled to request its removal. As such, the display of sexual content, including posters, graffiti, or any other form, is strictly prohibited. We **also forbid any written or printed material** that suggests any person is inferior, including content with sexual or racist undertones. The use of calendars,

magazines, or images resembling 'Playboy' or 'Playgirl' styles, or any material of a soft pornographic nature, is not permitted on Steadfast premises or in any work-related environment.

POSITIVE ATTITUDE

27. Responsibility for upholding this policy and fostering a positive, inclusive attitude lies with every individual within the organisation. Success depends on the collective commitment to equality, respect, and fairness. Steadfast also encourages all external partners and stakeholders to share in this responsibility, promoting a culture of mutual respect and shared values across all interactions and environments.

EFFECTIVE USE OF POLICY

28. As part of Steadfast's induction process, every employee receives a copy of the Equality & Diversity Policy to ensure full awareness and understanding from the outset. We also require all work placement providers to have their own equality and diversity policy in place. Where such a policy is absent, Steadfast's policy will be issued to ensure compliance and consistency. For ongoing access, the policy is made available to all employees via Bright HR.

RIGHT TO ADVICE AND COUNSELLING

29. Steadfast is committed to ensuring that all individuals connected with the organisation have access to appropriate advice and legal protection. We recognise the importance of supporting staff and learners in understanding their rights and responsibilities and will provide guidance and resources to help them navigate any concerns related to equality, diversity, and inclusion.

POSITIVE DISCRIMINATION AGAINST GENDER STEREOTYPING AND THE GENDER EQUALITY DUTY

30. Steadfast is committed to challenging gender stereotypes and promoting gender equality across all areas of work and training. All staff are expected to actively inform and encourage learners to explore opportunities beyond traditional gender roles. In line with the **Gender Equality Duty introduced in April 2007**, staff must also uphold their public duty to eliminate unlawful gender discrimination, promote equal opportunities for men, women, transgender, and transsexual individuals, and ensure that employment practices related to pregnancy, childcare, and family life are reviewed carefully to guarantee fairness and inclusivity for all.

RACE EQUALITY DUTY AND DISABILITY EQUALITY DUTY

31. Steadfast expects all employers, employees, customers, and suppliers associated with the organisation to uphold a firm commitment to preventing racial harassment and promoting equality. This includes fostering an inclusive environment where individuals of all backgrounds and abilities are treated with dignity and respect, and where discrimination based on race or disability is actively opposed in line with legal and ethical standards.

HEALTH AND SAFETY

32. Steadfast is committed to ensuring that all staff work in environments that meet the standards set out in the Health and Safety at Work Act 1974. We take proactive measures to identify and address any defects or risks that may compromise safety. Full details of our approach to health and safety are outlined in the Steadfast Health and Safety Policy, which all employees are expected to follow.

VICTIMISATION

33. Steadfast is committed to protecting individuals from victimisation in any form. No person shall be treated unfairly for reporting behaviour that breaches this policy. Allegations made in good faith will be taken seriously and investigated appropriately. However, knowingly making false claims will be addressed in line with staff disciplinary procedures and may result in dismissal. Any staff member who bullies or harasses another individual in retaliation for a complaint, regardless of whether the complaint is upheld, may also face dismissal. All employees have the right to raise concerns under the Public Interest Disclosure Act 1998 without fear of reprisal.

COMMITMENT TO DISABLED EMPLOYEES AND APPLICANTS

34. Steadfast is committed to ensuring equal opportunities for disabled individuals in all aspects of employment, including recruitment, promotion, and training. We strive to provide appropriate equipment and facilities wherever possible to support disabled employees in fulfilling their roles effectively and safely.

35. We are dedicated to creating a working environment that is inclusive and respectful, where the specific needs of disabled staff, whether arising directly from their role or indirectly, are recognised and addressed. All employees and applicants will be treated with dignity and respect, and we are committed to maintaining a workplace free from discrimination, harassment, bullying, and victimisation.

36. Our Equal Opportunities Policy reflects the value we place on diversity and our social, moral, and legal responsibility to support the employment of people with disabilities. We aim to be recognised within the community as an organisation that offers fair and inclusive employment opportunities. Applicants should feel confident that they will be assessed based on their ability to perform the role.

37. If an existing employee becomes disabled, Steadfast will make every reasonable effort to provide retraining and retain them in suitable roles wherever practicable.

STEADFAST EQUAL OPPORTUNITIES PROCEDURES

38. Steadfast has established procedures to protect both staff and learners from harassment and bullying in the workplace and throughout any part of their training. These procedures ensure that everyone has access to appropriate channels for raising concerns and seeking redress.

39. Facilities used by learners are subject to regular formal reviews, with improvements made as necessary to maintain a safe, inclusive, and supportive environment. Learners are encouraged to raise concerns either formally or informally, and private discussions can be arranged upon request.

40. Workplace and work placement contract procedures are periodically reviewed to ensure fairness and alignment with Steadfast's commitment to equal opportunities. All contracts and service level agreements include clear, accessible language that reflects our equality and diversity policy, ensuring external organisations understand and uphold these standards. This applies to contracts for full-time, part-time, temporary, sessional staff, and consultants.

41. Steadfast also respects religious and cultural practices. The dress code will accommodate individuals whose customs require specific attire, and consideration will be given to fasting periods, prayer times, and the need for privacy. Learners wishing to discuss matters related to religious festivals or celebrations are encouraged to speak with the Equal Opportunities Co-ordinator to ensure their needs are understood and respected.

MANAGEMENT RESPONSIBILITY AND VICARIOUS LIABILITY

42. The Directors of Steadfast fully accept their responsibility for ensuring compliance with all relevant legislation and Acts of Parliament. They recognise the legal implications of vicarious liability and understand that the organisation may be held accountable for the actions of its employees. As such, they are committed to maintaining robust policies and procedures that uphold legal standards and promote a fair, respectful, and inclusive working environment.

CO-OPERATION BY STAFF

43. As a member of Steadfast, you are expected to actively support and comply with all measures aimed at promoting and sustaining equality of opportunity. This includes reporting any incidents of bullying or harassment and ensuring that you do not, through action or inaction, contribute to discriminatory behaviour. Every individual has a role to play in fostering an inclusive and respectful working environment.

44. Steadfast is committed to building a culture that embraces equality and diversity across the organisation. We aim to identify and eliminate inequalities in opportunity and celebrate the diverse backgrounds and experiences of our staff.

45. To support this, Steadfast continuously reviews and updates its policies and procedures to ensure they remain fair, relevant, and aligned with legal standards. This ensures that staff, employers, visitors, customers, and suppliers are equipped with the knowledge and understanding needed to meet the diverse needs of the business.

46. The effectiveness of these policies is monitored through data analysis, with findings shared during staff and operational review meetings, and reflected in our communications, marketing materials, and day-to-day practices. Steadfast will continue to review and refine this strategy to align with the company's strategic goals and the values and expectations of our clients.

OUR DISCIPLINARY AND GRIEVANCE PROCEDURES

47. Steadfast's Grievance and Disciplinary procedures are outlined in separate, dedicated documents, which include guidance on how and to whom an employee should raise a grievance, typically their line manager. Engaging with these procedures does not affect an employee's legal right to submit a claim to an employment tribunal within three months of an alleged incident of discrimination.

AGREEMENT TO FOLLOW THIS POLICY

48. The equality, diversity and inclusion policy are fully supported by senior management and has been agreed with employee representatives.

FEEDBACK

49. Steadfast welcomes feedback from employees and clients on how we can improve our equality and diversity systems and procedures. Your suggestions are valued and contribute to the ongoing development of a fair and inclusive working environment. If you have ideas or recommendations, please share them with the Compliance Manager by emailing steven.hope@steadfastsecurity.co.uk. We appreciate your cooperation and commitment to continuous improvement.

APPROVAL

50. The above policy has been approved by the board of directors for distribution.

Paul Harbord
Managing Director, The Steadfast Security Group
02 October 2025