



Equality, Diversity & Inclusivity Policy

Purpose and Scope

For the purposes of this document, 'the Company' is hereby referred to as any of the following entities within the group:

Stadium Traffic Management Ltd – company number 07099264
Stadium Facilities Management Ltd – company number 09886465
Stadium Traffic Management Training Ltd – company number 08501707.

The purpose of this policy is to confirm and communicate the Company's policy on promoting equality and diversity of Stadium employees, future employees and learners on programmes managed by them.

This policy does not form part of employees' contract of employment and the Company may amend it at any time.

Policy Statement

Stadium is committed to providing equal opportunities and zero tolerance of discrimination, which is demonstrated through our employment policies, procedures and practices. We believe that discrimination is unjust and unfair to individuals, groups of people and communities. Stadium is dedicated to encouraging a supportive and inclusive culture amongst the whole workforce. It is within our best interest to promote diversity and eliminate discrimination in the workplace.

We will ensure that no one is treated any less favourably on the grounds of their race, colour, ethnic or national origin, gender, gender identity marital status or civil partnership status, domestic responsibilities, disability, age, sexual orientation, trade union activity, religious or other beliefs, poverty or social status.

We accept our responsibility to ensure that no employee, applicant or trainee is discriminated against as defined by the provisions of the:

- Race Relation Act 1976, Amended Race Relations Act 2000
- Sex Discrimination Act 1975

- Disability Discrimination Act 1995
- Equal Pay Act 1994
- Sexual orientation regulations 2003
- Employment Equality Religion or Belief regulations 2003
- Employment Equality Age Regulations 2006
- Equality Act 2006
- Equality Act 2010
- Worker Protection Act 2023

Stadium seeks to promote equal opportunity in recruitment, employment, promotion, training and career development.

The responsibility for enforcement of this policy rests with the Directors, who will monitor the effectiveness of the policy and associated initiatives.

The implementation of initiatives in support of the policy is the responsibility of the Directors and Managers. All employees also have an obligation to avoid discrimination and promote equal opportunities in the workplace and in our relationships with clients and others.

Objectives

The objectives of our Equality, Diversity & Inclusivity Policy are:

To ensure Stadium makes best use of its employees and potential employee's skills, talents and abilities in delivering the company's services. We believe that our employees are a critical asset to this company and will ensure that the best people are appointed to deliver our services.

To ensure Stadium fulfils its legal obligations under the equal opportunities legislation and complies with provisions contained in its various Codes of Practice, we will ensure that our policy is reviewed annually to ensure that its provisions adhere to best practice.

To ensure that all employees and job applicants are given equal opportunity and that our organisation is representative of all sections of society. Each employee will be respected and valued and able to give their best as a result.

To encourage anyone who feels they have been subject to discrimination or unfair treatment to raise their concerns so we can apply corrective measures and review all practices and procedures.

To inform all employees that a fully supported equality and diversity policy is in operation and that they are obligated to comply with its requirements and promote fairness in the workplace. The policy will also be drawn to the attention of funding agencies, stakeholders, customers, learners, and job applicants.

Guidance on Achieving the Objectives

The following guidelines provide information, advice and guidance to managers, supervisors and employees regarding their responsibilities in achieving the objectives of our Equality, Diversity & Inclusivity Policy.

Definitions

Direct discrimination

Direct discrimination occurs when a person is treated less favourably than others in similar circumstances because of their race, colour, national or ethnic origin, gender, gender identity marital status, disability, sexuality, age or religious belief. It is also discrimination to segregate, harass or victimise people on these grounds.

Indirect discrimination

Indirect discrimination means applying conditions or setting requirements or asking for certain qualifications that will adversely affect one particular group more than another and cannot be justified in terms of what is actually required to do the job or provide the service being offered.

Discrimination on grounds of perception or association

Discriminating against someone because of that person's association with someone having a protected characteristic, these being their race, colour, ethnic or national origin, gender, gender identity, marital status or civil partnership status, disability, age, sexual orientation.

Recruitment and Selection

- a) The governing factor for appointments will be based on merit, competence and the ability to do the job.
- b) All jobs will be advertised externally and internally.
- c) All job advertisements will carry wording designed to encourage applicants from all sections of the community.
- d) Recruitment literature will describe jobs without gender, race or disability bias.
- e) Consideration will be given to using a range of advertising media to encourage and attract applicants from all sections of the community.
- f) All applicants will be assessed in the same way using the same evaluation and selection criteria.
- g) All job and persons specifications will be scrutinised to ensure that they do not discriminate, and reasonable adjustments will be considered where this would enable a disabled applicant to undertake the duties of the post.
- h) Selection criteria will not be set to unlawfully discriminate (directly or indirectly) on the grounds of gender, marital status, civil partnership or race or disability or age and should solely be related to the requirements of the job.
- i) Disabled job applicants who meet the essential criteria of the job description will be guaranteed an interview.
- j) Where selection tests are used, tests will be specifically related to the job and in the case of ability tests they should be fully validated so as to avoid any bias on the grounds of gender, marital status or civil partnership, race or disability. Reasonable adjustments will be made, where appropriate, for disabled persons to ensure equality.

At job interviews generalised assumptions and prejudices about age, gender reassignment, race, disability, marital and civil partnership status, religion or belief, sex and sexual orientation will not enter into selection decisions.

All interview questions will relate to the requirements of the job.

Managers involved in recruitment and selection decisions will have received appropriate training.

Monitoring and Evaluation

To ensure we are achieving our policy objectives, we will monitor the effectiveness of our policy by keeping records of our recruitment selections process and undertaking annual headcounts to ensure that our workforce reflects the community it serves.

We will annually monitor and measure the effectiveness of the policy reviewing our practices where there are shortfalls and developing solutions and implementing them. There may be occasions when it will be appropriate to consult with external specialist consultants to help achieve our objectives.

The records will contain information on protected characteristics. Each applicant and employee will be offered to complete our Recruitment Monitoring Questionnaire.

Appraisal, Training, Career-Development, Promotion and Transfer

Where posts are internally advertised only (i.e. offering career-development and promotion opportunities to existing employees), the same principles as those governing external recruitment and outlined in paragraph 1(a) to (n) will apply.

Stadium's performance and development agreement scheme should relate specifically to the job/career of the individual and will avoid any bias or assumptions based on an employee's gender, marital status, or civil partnership, disability, ethnic origin, sexual orientation, religion/belief or age. The scheme will only involve assessing employees' aspirations and managers' views on employees' capabilities, performance and potential.

All employees will be encouraged to take suitable opportunities for training and advancement. In particular, in areas of work where certain groups are under-represented (especially in senior management), managers will take a pro-active role in ensuring employees from such under-represented staff take up training opportunities that assist their future possible entry into these areas of work.

Employees who have recruitment and selection responsibilities and/or who have supervisory responsibilities will undertake training in recruitment, selection, and in equal opportunities to ensure awareness and fairness in their assessment and selection process enabling them to encourage and promote equal opportunities for all.

Employees who have direct contact with members of the public will undertake training on dealing with service users to ensure awareness of their customers' needs and the public at large, ensuring satisfactory service delivery.

In situations where employees are being re-deployed due to changes in the operational arrangements of Stadium, the procedures for re-deployment will be free from bias on the protected grounds.

Where employees are no longer able to undertake full duties of their posts due to disability or ill-health, the primary aim of Stadium will be to try and keep that person in employment. A range of reasonable adjustments will be discussed with the employee, including transfer to an alternative post. No changes will be implemented without the agreement of the employee. Assistance will be sought where appropriate from the Department for Work and Pensions.

Dismissal and Redundancy

In cases where employees are being dismissed, this decision will not be made on grounds of their age, gender reassignment, race, disability, marital and civil partnership status, religion or belief, sex and sexual orientation and decisions will be made solely in accordance with the Company's disciplinary procedure.

Intentional, direct and overt acts of unlawful discrimination or harassment will be regarded as gross misconduct and will probably result in dismissal of the individual.

In cases where redundancies are necessary, decisions will not take account of age, gender reassignment, race, disability, marital and civil partnership status, religion or belief, sex and sexual orientation. In particular, disabled people who fall within the definition of the Disability Discrimination Act will not be made redundant without reasonable cause.

Where an employee has been found guilty of theft or bringing the company into disrepute the employee may be dismissed.

General Provisions

- a) While the overall responsibility for the Policy lies with the Managing Director, every employee has a personal and legal obligation to avoid discrimination, and to promote equal opportunities for all. Stadium will ensure that all employees are aware of these obligations.
- b) All personnel policies and procedures, particularly those relating directly to equal opportunities, will be regularly reviewed to ensure they are operating in a non-discriminatory manner, are consistent with legislative changes and are adequately assisting the implementation of the Equality, Diversity & Inclusivity Policy.
- c) Complaints of discrimination by employees should be raised in accordance with the Grievance Procedure, and complaints by job applicants should be made to the Managing Director. Any complaints will be treated seriously and sensitively.

Equality, Diversity & Inclusivity in Service Delivery

Customer First Policy

Stadium takes active steps to provide equal opportunities, in service, delivery and the employment of staff. We are committed to building on our existing achievements through improving our services and employment practices.

Stadium is committed to equal opportunities, both in the delivery of services and the employment of staff.

Equal opportunities means that our customers will not be treated less favourably because of their age, gender reassignment, race, disability, marital and civil partnership status, religion or belief, sex and sexual orientation.

Our commitment to equal opportunities means we will encourage the development of understanding and appreciation of diversity and lifestyles.

- We will take positive steps to ensure equal opportunities in complying with the provisions of the various equality legislation and specifically:
- Race Relations Act 1976, Amended Race Relations Act 2000
- Sex Discrimination Act 1975
- Equal Pay Act 1984
- Equality Acts of 2006 and 2010
- Disability Discrimination Act 1995
- Worker Protection Act 2023

The company expects its workforce to have a positive attitude to equality issues, treating each other equally and fairly regardless of their race, colour, national or ethnic origin, gender, marital status, disability, sexuality, age or religious belief. All employees are responsible for complying with our policies in the following ways:

Providing equal access

We will ensure that services are available and accessible to our customers, seeking to remove barriers that prevent equal access and in particular meet the requirements of the Disability Discrimination Act 1995 to make reasonable adjustments and remove physical barriers.

We recognise and respect human diversity and will ensure that our services are flexible and responsive to people's needs. We will change and improve services to meet the needs of a changing society.

We will:

Make information widely available, accessible and where necessary, make sure that it can be reached by everyone who uses these services.

At all times, use plain English to communicate and use positive images, not stereotypes.

Accessibility of Services

Stadium will work with local people to provide a safe environment.

Planning and Improving Services

We will ensure that the workforce and service delivered is reflective of the community it services.

The success of our service is demonstrated by our customer base and we aspire to continually review and improve services ensuring they meet the needs of customers. We are a customer led organisation, committed to consulting widely with users and staff to ensure that our service meets their requirement.

We will ask our clients for feedback on projects undertaken ensuring that those consulted are reflective of the community. We will act on, and report back on, the outcome of our feedback by improving services wherever possible. We will endeavour to enhance our reputation as a provider of high-quality services.

Monitoring and Improving Performance

Monitoring

We will endeavour to improve service by monitoring continually the quality of our service delivery and the effectiveness of our Equality, Diversity & Inclusivity Policy.

We will:

Monitor services regularly and bring forward action plans for improvement.

Solicit feedback from our customers about our standard and quality of service delivery.

Recognise and use the experience of staff in improving services.

Monitor the effectiveness of our Equality, Diversity & Inclusivity Policy to ensure that there is clear representation and transparency in our recruitment and promotion processes.

Provide regular public reports about the quality of the services and the views of those who use them.

Stadium prides itself in quality of service and workmanship and wants to keep our customers. We want our customers to be honest with us and we will be honest when things go wrong and work quickly to put them right.

Provide clear and accessible information to the public and its customers on how to complain;

Listen to complaints and comments and act upon them in an agreed time scale;

Tell you what action we have taken on your complaint;

Treat all complaints fairly in accordance with its equalities policy and framework and monitor all complaints to ensure that this is being achieved;

Use complaints to improve the quality of services.

Our Staff

We will endeavour to have a workforce that reflects the communities serviced. This is achieved through our Equality, Diversity & Inclusivity Policy which is practised in recruitment and selection for jobs. We equally offer training and promotion to our staff.

We will provide staff with training on equal opportunities in service delivery within the framework of the Company's Code of Conduct;

Ensure that our staff treats everyone fairly and equally and to a high standard of behaviour;

Do not use discriminatory practices in delivering services;

Take disciplinary action against staff in breach of the policy;

Develop the potential of staff from discriminated against groups, (through training, mentoring and monitoring);

Enhance our reputation as an equal opportunity employer;

Provide a safe and harassment free environment for staff;

Make sure staff are comfortable with and clear about their rights and responsibilities.

Our Customers

Stadium values its customers and has a duty of care to ensure that all customers are treated fairly and without prejudice. Our customer care policy is consolidated with the principles of our Equality, Diversity & Inclusivity Policy and all members of staff are bound by this.

Stadium has an expectation that its customers will not harass or discriminate against its staff and will treat our staff fairly and equally. As we will act upon a member of our staff discriminating or harassing our customers, we will take action upon a customer harassing or discriminating against our staff.

Code of Conduct

It is of extreme importance to remember that when you carry out your duties you are representing Stadium. and it is important that you understand and comply with the company's Equality, Diversity & Inclusivity Policy and guidance.

The aim of the Equality, Diversity & Inclusivity Policy is to ensure that customers and members of the public are treated equally and fairly, and no one is discriminated against, harassed or victimised because of age, gender reassignment, race, disability, marital and civil partnership status, religion or belief, sex and sexual orientation.

Employees are urged to be considerate of others and avoid harassing, offending or discriminating against our clients or members of the public as this is offensive. Should any employee be found guilty of this they will face disciplinary action and could be dismissed for gross misconduct.

Our company policy is to show courtesy, respect and consideration and must be communicated in action and words at all times.

To ensure that you understand what the company expects you should bear in mind at all times the following:

Sexual Harassment

Unwanted and unwelcome attention, this means comments, looks, actions, suggestions or physical contact that people object to or find offensive.

You should never harass members of the public or clients for example by shouting or whistling.

There should be no unwanted physical contact that people object to which can be offensive. Physical contact can also include pats, pinches, unnecessary touching or brushing against someone's body. Also do not make suggestive remarks, use affectionate pet names, tell sexually explicit jokes or make comments on appearance.

Sexual harassment can also include questions of a personal nature which are not connected to the carrying out of your work.

Disability

They may have a physical or sensory impairment, mental health issue or learning difficulty or combination of these. Sometimes disabilities are not obvious and someone with an unseen disability may not wish to declare or show their disability.

You should always be considerate and sensitive to the fact that people with physical disabilities will have different needs and the service may need to make specific arrangements. For example, when working on site ensure that there is access for wheelchairs and adequate signage to alternative routes.

Do not be rude or patronising to others because of their disabilities. Always try to be helpful when carrying out your work.

Racial Harassment

Actions and practices that are racially motivated. These actions are unwanted and cause offence, distress and humiliation. You should never harass a client or member of the public on the basis of their ethnicity, nationality or religion.

Racially motivated harassment consists of jokes or comments based on stereotypes of cultures or religion. You are reminded that we live and work in a multi-cultural society where many people do not speak English as a first language. Sensitivity to and awareness of different cultures is at the heart of providing an appropriate service.

Sexual Orientation

It is unacceptable to victimise or harass clients, members of the public or colleagues on the grounds of sexuality, orientation, perceived sexual orientation or association with someone of a specific sexual orientation.

Harassment can take the form of intimidation or threatening to “expose” a lesbian, gay or bisexual person to colleagues or other people in the local community.

Victimisation is defined as treating a person less favourably than others would be in the same circumstances because that person has made a complaint or allegation of discrimination or has acted as a witness or informant in these proceedings.

Harassment, Discrimination and Victimisation to members of the public, customers or colleagues is an offence and will not be tolerated. Disciplinary action will be taken against anyone found guilty of committing such an offence.

BACKGROUND DOCUMENTS

The following legislation is relevant to the question of eliminating discrimination and promoting equal opportunities.

Gender, Gender Identity and Marital / Civil Partnership Status

a) Sex Discrimination Act 1975

Under the Act it is unlawful to discriminate (directly or indirectly) on the grounds of gender or marital status in employment, training and related matters and in the provision of goods, facilities and services.

b) Equal Pay Act 1970 (amended 1983)

The Act seeks to eliminate discrimination on the grounds of gender with regard to terms and conditions of employment and pay. The Act enables a woman to compare her job with the same or a different job being performed by a man and to argue that the jobs are of “equal value”, deserving equal pay, terms, and conditions.

c) Gender Recognition Act 2004

The Act protects employees and service users who are about to go through, are going through or have gone through gender re-assignment from discrimination. The Act also protects people within this group from disclosure about their status.

d) Equal Opportunities Commission: Code of Practice.

The Code of Practice sets out a series of recommended ‘good employment practices’ aimed at eliminating gender and marriage discrimination and promoting equality of opportunity. Failure by the Company and its employees to observe the provisions of the Equality Commissions Code of

practice can put our company at risk should actions be implemented against us. Therefore, the Code's recommendations are as far as possible incorporated into this document.

Race, Colour, Ethnic or National Origin

a) Race Relations Act 1976 (Amended Race Relation Act 2000)

The Act makes it unlawful to discriminate (directly or indirectly) on racial grounds (that is, race, colour, nationality or ethnic origins) in the field of employment, training and related matters, in education, provision of goods and services and in disposal and management of premises.

b) Commission for Racial Equality: Code of Practice

The Code of Practice aims to give practical guidance on how to eliminate racial discrimination and to enhance equality opportunities.

Failure by the Company and its employees to observe the provisions of the Code could put the Company at risk in any proceedings, which might be taken against it. Therefore, the Code's recommendations are as far as possible incorporated into this document.

Disability

a) The Disability Discrimination Act 1995 as amended by the Disability Discrimination Act 2005 and Equality Act 2010

Employers have a duty to ensure that they do not discriminate against people who come under the definition in the Act of disabled people.

Employers also have the duty to ensure that they make reasonable adjustments in relation to the employment of disabled people. The Act places the same responsibilities with regards to providing goods and services to people with disabilities. The requirement to make reasonable adjustments or to provide an auxiliary aid is not dependent on prior knowledge of the customer's disability.

b) Disability Rights Commission: Code of Practice

The Code of Practice serves to help employers develop good practices in employing disabled people and is available from the Human Resource Manager. The provisions of the code are as far as possible incorporated into this document.

Gender

a) Sex discrimination Act 1974 as amended by the Gender Recognition Act 2004 and Equality Acts 2006 and 2010; Equal Pay Acts 1970 and 1984

Employers and service providers have a duty not to discriminate on account of a person's gender or gender re-assignment.

Inclusivity

At Stadium we deliver Security and Stewarding professionally, it is our passion, and we are committed to delivering the best possible service through inclusive and fair recruitment, selection and training excellence.

We understand that inclusion goes beyond diversity and to make all things equal is not to make all things the same. Inclusion is a sense of belonging, and inclusive cultures make people feel respected and valued for who they are as an individual or group. At Stadium, we are striving to understand and respect everyone's differences, and we support these differences appropriately to provide people with the chance to develop and grow into the best version of themselves.

As a local business we are well positioned to be a catalyst for change, connecting to the diverse communities within the region and to work with the OC to identify and address the needs of these communities, allowing us to adapt our recruitment and communications to reach people not traditionally engaged in employment or societal projects.

Through our current HR, recruitment, and retention systems we have carefully designed processes which aim to eliminate bias, promote standardisation, and ensure equality.

To assess our current workforce, we have recently undertaken a census which has confirmed that we have an inclusively diverse workforce (please see Appendix 5 – Census Results). We will commit to undertaking every 3 months to allow us to compare our workforce profile against our local population and to ensure we are steadily moving closer to the 50/50 male/female gender split across the board.

We are an equal opportunities employer and proactively engage with initiatives to provide opportunities within the industry. Some examples of this include our accreditation with the following:

- Disability Confident employer scheme run by the DWP
- Defence Employer Recognition Scheme – Bronze Award working towards Silver in 2021

We have stringent recruitment and vetting processes. These processes have been developed in such a way that they are reliant on the prospective employee's demonstration of commitment to their potential new role. This guarantees that our applicants are serious about becoming events industry professionals and we will support them in doing so.

However, this contract provides us with the opportunity to go over and above our current processes and commitments. We will work with the OC to address other regional access, employment and skills challenges which may expand recruitment into targeted groups such as those from migrant communities, people with low education and skills, proportionately affected by age (young or old) or suffering from the effects of long-term unemployment.

Our people are our lifeblood, and we make sure our staff are trained to the highest standards. Nothing else will do.

Stadium's workforce benefit greatly from having access to industry leading training and upon joining the organisation are enrolled onto a comprehensive delivery schedule which ensures knowledge retention, engagement, and accessibility. Our Learner Management System (LMS) has accessible learning functionalities, to ensure it is accessible to all.

In addition to this formal training, we also utilise our ability to deliver online learning via our LMS and as such can offer our employees various Continual Personal Development courses including:

- Equality and Diversity
- Communicable Diseases Awareness
- Spectator Safety NVQ
- SIA Courses
- Action Counters Terrorism (ACT)
- GDPR
- Site specific induction materials

At Stadium we embrace change, especially if it means we become a better employer and neighbour. We will use this contract to explore Stadium's culture and visible effects, such as participation in meetings, how offices are physically organised or access to facilities or information. We continue to provide advice, guidance, and support for all employees across the board when necessary.

We want our employees and communities to feel part of our success, and by creating a culture shift that increases inclusion, we can create higher economic, societal, and environmental performance where motivation and morale soars.

Upcoming initiatives will include:

- Courageous conversation sessions
- Learning and development opportunities for BAME staff
- Becoming a Member of the Race Equality Network
- Collaborate with other employee networks and external partners
- Raise awareness of cultural events within our internal newsletters and company news
- Providing opportunities for line managers to learn about cultural diversity and support diverse teams effectively

As well as the provision of local job opportunities, to successfully allow the community to feel included in the success of the Games, we will engage with local businesses, residents, and community organisations to get to know them better and understand the challenges that the area is facing in terms of deprivation and social action and communicate the work we are doing to support the Games.

We will invite staff to join in with our challenges and initiatives. As we develop strong relationships and develop our legacy, we will be able to identify key priorities and impacts within our wider community and appropriately donate staff time, goods and services or monetary offerings, make environmental changes, or offer up other assets such as space in our office for community meetings.

Our commitments to inclusion can be found in Table 1. As with our social values work, we are aware that the detail within some of these commitments may likely change or adapt as we fully engage with the OC and specific needs, skills and challenges that may arise.

More specific targets will be developed to fit under the TOMS reporting system, as well as including qualitative measures focusing on the reflective impact of individual and group experiences. If necessary, we will employ an external evaluator to develop and verify effective measures and methods which can be reported back to the OC.

Conclusion

We are committed to and promoting the positive actions of equal opportunities. We believe that our Equality and Diversity Policy helps to ensure that there is no unjustified discrimination in the recruitment, retention, training and development of staff on the basis of age, gender reassignment, race, disability, marital and civil partnership status, religion or belief, sex and sexual orientation.



David McAtamney
Executive Chairman

27/01/2025

Date

Document Information

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