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Wednesday, 14 July 2022

To: All Members of the Alexandra Palace and Park Board

Dear Member,

Alexandra Palace and Park Board - Tuesday, 19th July, 2022

I attach a copy of the following reports for the above-mentioned meeting which were not available at the time of collation of the agenda:

11. FINANCE REPORT (PAGES 1 - 6)

To note the report.

Report to follow.

12. TRUSTEES' REGISTER OF INTERESTS

To consider whether any trustees' interests are likely to give rise to a serious conflict of interest.

Report to follow.

13. POLICY REVIEWS (PAGES 7 - 38)

The board are asked:

- a. To approve the amended Safeguarding Policy; and
- b. To approve the amended Whistleblowing Policy.

Report to follow.

17. EXEMPT SPORTS GROUND LEASE (PAGES 39 - 78)

To approve the recommendations in the report.

Report to follow.

**21. EXEMPT FEEDBACK FROM THE CHAIR OF THE TRADING
SUBSIDIARY (PAGES 79 - 80)**

To note the report.

Report to follow.

Yours sincerely

Jack Booth, Principal Committee Co-ordinator
Principal Committee Co-Ordinator

LATE BUSINESS SHEET

Report Title: Agenda Items 11, 12, 13, 17, and 21

Committee: Alexandra Park and Palace Board

Date: Tuesday, 19 July 2022

Reason for lateness and reason for consideration

Under s100B(4)(b) of the Local Government Act 1972, the chair of the meeting is of the opinion that the reports should be considered at the meeting as a matter of urgency by reason of special circumstances. These circumstances are that there was no statutory officer available to make comment on the reports mentioned. This was due to required officer taking emergency leave. Statutory comments have now been made. It is requested that the report be considered by the Alexandra Park and Palace Board at its meeting on 19 July 2022. This was agreed by the Chair on 12 July 2022.

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ALEXANDRA PARK AND PALACE CHARITABLE TRUST BOARD MEETING

19 JULY 2022

Report Title: Financial Update

Report of: Richard Paterson, Director of Finance and Resources

Purpose: This report seeks to inform the Committee of the outturn position of the Group in 2021/22 and the financial outlook of the Group for the current Financial Year.

1. Recommendations

- 1.1 To note the year end position of the Trust for 2021/22.
- 1.2 To consider the draft Budget and make a recommendation to the Trustee Board.

2. 2021/22 FULL YEAR

- 2.1 At the end of March 2022, the Trust finished the year with unrestricted revenue of **£3,288,137** (Budget: £2,527,318) with expenditure of £3,850,038 (Budget: £3,974,107) and an operating unrestricted deficit of **£561,901** (Budget: £1,446,789); an improvement of £884,887 that is largely due to the impact of the 3rd Round of the Culture Recovery Funding received in the year.
- 2.2 This funding was aimed specifically at underpinning operational staff costs and security, but also allowing the Trust to invest in key infrastructure like a new Time and Attendance System, a new HR and Payroll system together with making improvements around the park such as the new paths that will improve the overall safety and the visitor experience. These investments simply would not have been possible without this funding.
- 2.3 Capital funding is as ever, challenging. Last year, the Corporate Trustee provided special grant funding of £858k to support the rewiring of the West Hall and the replacement of Fire Alarms. In addition, they also supported the Trust in securing a Salix loan to invest in energy efficient lighting that will prove to be a critical investment in the Palace as it looks to generate increased revenue and profits in APTL.

Table 1 – 2021/22 Actual Income and Expenditure Summary

	Year 2021/22 Budget £	Year 2021/22 ACTUAL £	Variance to Budget £
Income			
HC Grant - Operational	1,755,000	1,755,000	0
Gift Aid	0	0	0
CRF Round 1	84,210	83,895	-315
CRF Round 3	0	702,000	702,000
Palace APTL Licence	100,000	100,000	0
Donations via fundraising platforms	24,100	23,898	-202
Carparking	297,840	246,807	-51,033
Park Leases and Recharges	193,693	285,602	91,909
Palace Leases and Recharges	72,475	74,774	2,299
Creative Learning	0	16,161	16,161
Total Income	2,527,318	3,288,137	760,819
Expenses			
Running and maintaining the Park	-571,228	-688,865	-117,637
Running and maintaining the Palace	-2,582,104	-2,345,268	236,836
Creative Learning	-4,710	-13,886	-9,176
Strategic Projects	-241,877	-214,844	27,033
Fundraising	-120,422	-107,614	12,808
Strategic Leadership	-266,092	-222,400	43,692
Support Costs	-187,674	-191,107	-3,433
Total Expenses	-3,974,107	-3,783,982	190,125
Transfers		-66,056	-66,056
Surplus/Deficit	-1,446,789	-561,901	884,888

- 2.4 Although finishing the financial year with an unrestricted deficit of £561,901 is not ideal, the Committee should be reassured that the cash balance as at the end of the financial year was still £931k plus an additional £600k for capital and restricted projects.
- 2.5 The majority of variances are mainly positive with the organisation spending less in the run up to the end of the financial year to ensure the best possible financial outcome for the Trust. The overspend in Park Maintenance was fully funded from the Cultural Recovery Fund and is therefore not a problem.

3. 2022/23 Current Position

- 3.1 Due to the economic uncertainty surrounding this financial year, the first two months for the Trust have been reasonably quiet from a financial perspective and income and costs have been at or around budget with the Executive Team keeping a watching brief and not committing significant expenditure.
- 3.2 The outturn position shown below includes the Gift Aid that will be transferred to the Trust this financial year. Significantly, the Gift Aid payment has meant that the additional Grant requested from the Corporate Trustee has been removed. Some working capital may still be required towards the back end of the financial year, but this will be managed closely.
- 3.3 Overall, the Trust is now reporting a revised Budget position with Income of **£3,842,236** and a loss of **£508,984**. See Table 32 below.

Table 2 – Forecast Income and Expenditure Summary

	Year 2021/22 Budget £	Year 2021/22 ACTUAL £	Year 2022/23 Revised Outturn £	Variance to 21/22 ACTUAL £
Income				
HC Grant - Operational	1,755,000	1,755,000	1,755,000	0
Gift Aid	0	0	941,828	941,828
CRF Round 1	84,210	83,895	0	-83,895
CRF Round 3	0	702,000	0	-702,000
Palace APTL Licence	100,000	100,000	200,000	100,000
Donations via fundraising platforms	24,100	23,898	40,000	16,102
Carparking	297,840	246,807	525,000	278,193
Park Leases and Recharges	193,693	285,602	274,153	-11,449
Palace Leases and Recharges	72,475	74,774	106,255	31,481
Creative Learning	0	16,161	0	-16,161
Total Income	2,527,318	3,288,137	3,842,236	554,099
Expenses				
Running and maintaining the Park	-571,228	-688,865	-656,181	32,684
Running and maintaining the Palace	-2,582,104	-2,345,268	-2,820,803	-475,535
Creative Learning	-4,710	-13,886	-12,190	1,696
Strategic Projects	-241,877	-214,844	-248,673	-33,829
Fundraising	-120,422	-107,614	-129,253	-21,639
Strategic Leadership	-266,092	-222,400	-237,031	-14,631
Support Costs	-187,674	-191,107	-247,089	-55,983
Total Expenses	-3,974,107	-3,783,982	-4,351,220	-567,238
Transfers		-66,056		66,056
Surplus/Deficit	-1,446,789	-561,901	-508,984	52,917

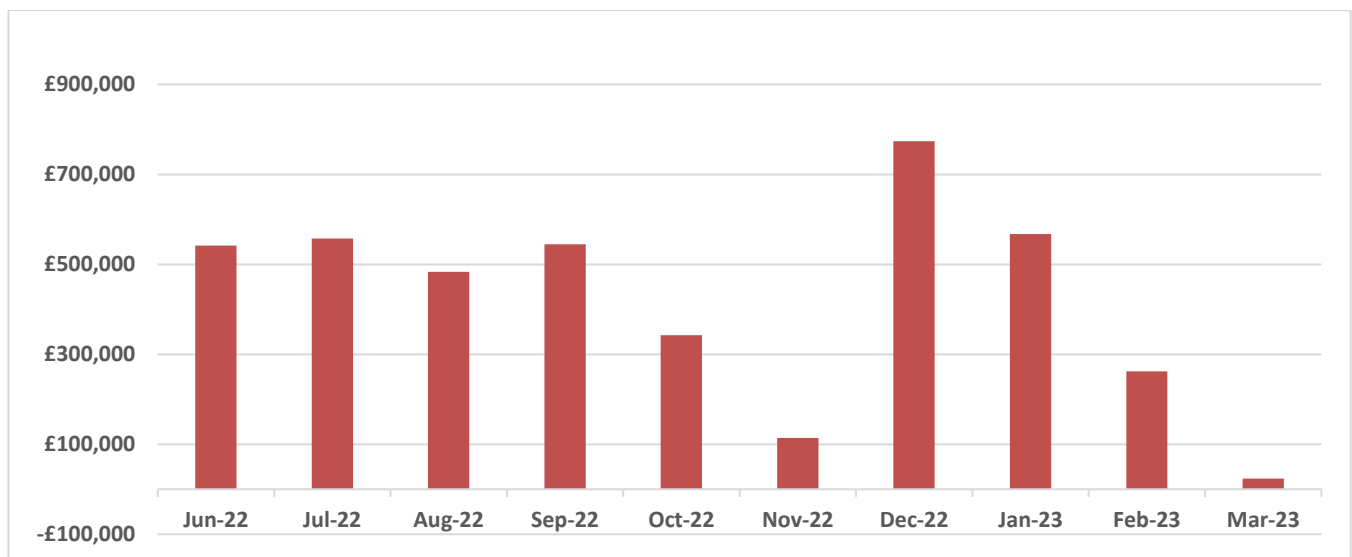
4 CASHFLOW

4.1 Cashflow remains difficult.

4.2 At the time of writing the Trust looks like it does not have a short-term cash need. Cash will need to be closely managed around October/November and then again in March'23 but this should be possible.

4.3 At the end of March'23, the Trust would only have a cash surplus of less than £30k and is a risk that needs to be closely watched.

Table 3 – Cashflow Projection



5. Risks

5.1 The fundamental risks are those that have already touched upon namely, the cost-of-living crisis, energy prices and inflation.

6. Legal Implications

The Council's Assistant Director of Corporate Governance has been consulted in the preparation of this report and has no comments.

7. Financial Implications

The Director of Finance, Haringey Council, notes that the current financial projections indicate that the provisional additional grant request of the corporate trustee is not now required. It is also noted that the current financial climate is difficult for both the Trust and its subsidiary (APTL). The difficult financial climate means that the Trustees and the management of the Trust must be vigilant in monitoring the budget and to take necessary measures should the assumptions underpinning the budget vary and expenditure or income are not as budgeted.



ALEXANDRA PARK AND PALACE CHARITABLE TRUST

BOARD MEETING

19 JULY 2022

Report Title: Review of Policies (Safeguarding & Whistleblowing)

Report of: Catherine Solomon (Director of HR & Organisational Development)

Purpose: To seek approval of updates to key board level policies.

Local Government (Access to Information) Act 1985 N/A

1. Recommendations

- 1.1 To approve and adopt the updated Safeguarding Policy, attached at Appendix 1.
- 1.2 To approve and adopt the updated Whistleblowing Policy, attached at Appendix 2.

2. Executive Summary

2.1 On induction board members receive the organisation's key policies. The key policies for which the Trustee Board and its Trading Subsidiary Board are responsible are listed in table 1 below and form part of an organisation wide register of policies. It is good practice to periodically review these, usually annually, bi-annually or as required when legislation or guidance changes.

2.2 Table 1 – Board Level Policies

DOCUMENT TITLE	DATE ISSUED	Last Reviewed	Next Review Due
Board Member Expenses Policy	Sept 2018	Jun-19	
Risk Appetite (& Risk Management Policy)	Feb 2018	Sept. 2019	Aug 22
Reserves Policy	April 2016		Aug 22
APTL Board Code of Conduct	June 2017	March 2020	
APPCT Board Code of Conduct	June 2017	March 2020	
Conflicts of Interest Policy - Trust	April 2016	March 2020	
Conflicts of Interest Policy - APTL	June 2019	March 2020	
Complaints Policy	Feb 2018	March 2020	July 2022
Whistleblowing Policy	June 2017	March 20	
Safeguarding Policy	June 2017	Jan 2020	
Health & Safety Policy	Nov 2018	March 2020	
Serious Incident Reporting Policy (SIR)	March 2018	March 2020	

- 2.2 This report informs trustees of recent updates to the Safeguarding and Whistleblowing Policies.

3. Safeguarding Policy Updates

Section 1. Introduction

- The reference to “vulnerable adults” has been updated throughout the policy as it is best practice to move away from this terminology and, instead, to use the definition from the Care Act – Adults at Risk
<https://www.anncrafttrust.org/resources/safeguarding-adults-at-risk-definitions/>

Section 4. Definitions

- Job title of Designated updated to Director of HR and OD
- Partners added to list of individuals providing services or performing work.
- Reference to HIV/Aids removed as this is not considered as a marker of an adult being at increased risk of harm or abuse.
- Reference to significant harm has been amended to harm as it could be interpreted as suggesting that low-level abuse will be tolerated. NSPCC’s working definition of Child Abuse - <https://learning.nspcc.org.uk/research-resources/briefings/definitions-signs-child-abuse>

Section 5. Legal expectations and requirements - Guidance and Charity Commission updates referenced with revised dates.

Section 6. Scope of our work

- Creative Learning activities have been updated at 6.3
- Reference to our medical contractor – new section added at 6.8
- Ask for Angela – new section added at 6.10
- Responsibilities in relation to fundraising new added at 6.11

Section 8. Operating safely online – new section added

Section 9. Safeguarding Roles and Responsibilities and Section 13 – Responding to concerns - Policy updated to reflect arrangements for when we are in Event Mode

The 2018 guidance only covered child protection/safeguarding, therefore reference and a link to the most relevant guidance for adult safeguarding has also been added (Making Safeguarding Personal (MSP) guide).

4. Whistleblowing Policy Updates

The main changes are as follows:

- Additional wording in order to make sure the policy is compliant with whistleblowing legislation and its aims.
- More encouragement to make disclosures and in the appropriate way, e.g. setting out the right to be accompanied to meetings, clarifying what happens if the whistleblower is mistaken, , explaining the limitations when responding to anonymous disclosures;
- Amended wording around there being no reprisals for raising concerns
- Stronger discouragement to take concerns to external bodies;
- Clarity to make each of the stage procedure a bit clearer.

5. Is the decision/ action consistent with the Charity's Vision, Mission Purpose and Values? Five Year Plan priority pillars?

- 5.1 The policy updates are in line with the Charity's mission and values and have no negative impacts on any EDI groups.

6. Legal Implications

The Council's Head of Legal & Governance has been consulted in the preparation of this report. The Charity Commission recommends that protecting people and safeguarding responsibilities should be a governance priority for all charities. The safeguarding policy reflects the expectations set out in Charity Commission Guidance. The Whistleblowing Policy is compliant with whistleblowing legislation.

7. Financial Implications

The Council's Chief Financial Officer has been consulted in the preparation of this report and has no comments.

8. Use of Appendices

Appendix 1 – Safeguarding Policy
Appendix 2 – Whistleblowing Policy

9. Background Papers None

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SAFEGUARDING POLICY

1. Introduction

- 1.1 This document sets out the policy and procedures of Alexandra Park and Palace Charitable Trust and its trading subsidiary APTL (hereafter known as **Alexandra Palace**) to ensure a safe environment for children, adults at risk, and all those benefiting from or working with Alexandra Palace. Alexandra Palace is committed to protecting the welfare and preventing the abuse of children and adults at risk with whom it comes into contact and in addition, ensuring that all those benefiting from or working with Alexandra Palace are not harmed in any way through contact with it.
- 1.2 Alexandra Palace recognises that all organisations providing activities for children and adults at risk share a commitment to their welfare and are required to comply with the Government's Statutory Guidance Working Together to Safeguard Children (2018) to minimise risks to children and Making Safeguarding Personal (MSP) guide for adults at risk who visit and take part in activities in the Park and Palace.
- 1.3 Where safeguarding concerns are raised, we will take swift action to ensure that concerns are acknowledged, correctly managed and reported.
- 1.4 Alexandra Palace recognises its duty to protect members of staff from bullying, harassment and discrimination. Alexandra Palace also recognises its responsibilities to protect staff and volunteers against unfounded allegations of abuse. Staff who have concerns about bullying, harassment and/or discrimination should refer to the following policies, which are available from HR.
 - Bullying and Harassment policy and procedure,
 - Equality, Diversity and Inclusion Policies
 - Whistleblowing policy.
- 1.5 This policy aims to ensure that children and adults at risk, and all those who work with them, are safe and supported within Alexandra Palace and its organised activities.

2. Policy Statement

- 2.1 Alexandra Palace acknowledges a duty of care to safeguard and promote the welfare of children and adults at risk and is committed to ensuring that its safeguarding practice reflects statutory responsibilities, is relevant and complies with best practice.
- 2.2 It aims to ensure that regardless of age, gender, gender reassignment, sex, religion or belief, race, ethnicity, disability, pregnancy and maternity, sexual orientation, marital status or socioeconomic background, all children, and adults at risk:
 - have a positive and enjoyable experience at Alexandra Palace in a safe environment; and
 - are protected from abuse.
- 2.3 Alexandra Palace acknowledges that some children and adults at risk, including disabled people, those with special educational needs or those from ethnic minority communities, can be at increased risk of harm and abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.
- 2.4 It is our policy that we will;
 - promote and prioritise the safety and wellbeing of children and adults at risk;
 - ensure all members of staff understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and adults at risk;
 - ensure appropriate action is taken in the event of incidents/concerns of abuse or risk of harm and provide support to the individual/s that raise or disclose the concern;

- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- do our utmost to prevent the employment/deployment of unsuitable individuals;
- ensure robust safeguarding arrangements and procedures are in operation.

2.5 Failure by an employee to comply with this policy and procedures may result in disciplinary action under the Alexandra Palace Disciplinary process.

3. Confidentiality and Information Sharing

3.1 Alexandra Palace has a responsibility to share relevant information about the protection of children and adults at risk. If a child or adult at risk confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child or adult at risk sensitively that he/she has a responsibility to refer cases of alleged abuse to the Designated Safeguarding Lead for their own sake. Within that context, the child or adult at risk should, however, be assured that the matter will be disclosed only to people who need to know about it. Members of staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts. Staff can contact the Designated Safeguarding Lead for guidance and clarification.

4. Definitions

4.1 For the purposes of this policy and procedure, the following definitions apply:

- a. 'Designated Safeguarding Lead' means the Director of HR and OD.
- b. 'DBS' means the Disclosure and Barring Service, the body that carries out functions previously undertaken by the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA).
- c. 'Member of staff' - The term 'Member of staff' shall mean any permanent, temporary or fixed-term employee, casual worker. It also covers individuals providing services or performing work, such as agency workers and contractors, contracted services, partners as well as volunteers.
- d. 'Child' - a 'Child' is anyone who has not yet reached their 18th birthday
- e. 'Adult at risk' is any person aged 18 or over who;
 - has needs for care and support (whether or not the local authority is meeting any of those needs); and is experiencing, or is at risk of, abuse or neglect;
 - as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Adults at risk could include:

- older people;
- people with a visual or hearing impairment, physical disability;
- people with learning disabilities;
- people with mental health conditions.

In some cases, adults at risk may lack the capacity to make certain decisions for themselves. The [Mental Capacity Act 2005](#) helps to protect people where this is the case, makes clear who can make decisions, in which circumstances and how they should go about doing this.

- f. 'Responsible adult' - Any adult, not being a parent of the Child, who, for the time being, has legitimate care, custody or control of that Child.
- g. 'Child Abuse' - Child Abuse is any action by another person – adult or child – that causes harm to a child. The consequences of the pain of Child Abuse are frequently more harmful than most people realise, and unresolved abuse issues may follow the child into adulthood. See **Appendix I** for detailed definitions. For further information, visit <https://learning.nspcc.org.uk/research-resources/briefings/definitions-signs-child-abuse>
- h. Abuse of adults at risk can include:
 - physical abuse including hitting, slapping, pushing, kicking, restraint, misuse of medication
 - sexual abuse including acts to which the adult at risk has not consented
 - psychological abuse including emotional abuse, threats of harm or abandonment, humiliation, intimidation, verbal abuse.
 - financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills or property.
 - neglect and acts of omission

- discriminatory abuse
- bullying and harassment
- Other – honour-based violence, forced marriage, human trafficking, extremism and radicalisation, exploitation by radicalisers who promote violence, female genital mutilation, domestic violence.

5. Legal expectations and requirements:

- 5.1 Alexandra Park and Palace Charitable Trust is a registered charity and complies with guidance published by the Charity Commission for England and Wales on safeguarding and serious incident reporting, including:
- Guidance – safeguarding and protecting people for charities and trustees (published 6 December 2017 and last updated 1 June 2022)
 - Guidance – how to report a serious incident in your charity (published 2 June 2014 and last updated 14 June 2019)
 - Guidance - reporting a serious incident in your charity when it involves a partner (published 19 December 2019)
- 5.2 Alexandra Palace does not at present deliver registerable services under the Care Act or under the Children Act as such. Nevertheless, it is a provider of 'teaching, training and instruction' (as defined in the guidance on Regulated Activity) to children and sometimes to adults at risk. Some of these fall within the definitions of Regulated Activities within the meaning of the Safeguarding Vulnerable Groups Act and the Department for Education (DFE) definitions of Regulated Activity.
- 5.3 The Charity has significant contact with children, has a duty to prevent abuse, to listen to children when they express concerns and to take the right action to protect them. We recognise that Section 11 of the Children Act 2004 and Working Together to Safeguard Children¹ (July 2018: Chapter 2) apply to us generally and apply specifically when engaged in Regulated Activity. Whilst we are not (in the legal sense) a school or college we do provide education and instruction and therefore seek to work to the standards set out in Keeping Children Safe in Education September 2021. We recognise documented definitions of types of child abuse and provide a senior manager (Director of HR and OD), who has the full support of the CEO and the Board, who performs the role of 'Designated Safeguarding Lead' who implements this policy and is there to advise staff, volunteers and colleagues and to manage referrals to safeguarding authorities. We also have an appointed Trustee as Safeguarding Lead.
- 5.4 In relation to adults at risk, we recognise Care and Support Statutory Guidance (Updated June 2022), the Safeguarding Vulnerable Groups Act 2006.
- 5.5 Above all Alexandra Palace recognises that the prevention of child abuse and the protection of adults at risk is everybody's business. It will continuously seek to achieve the best standards in its safeguarding practices.

See **Appendix 2** for further detail on relevant legislation.

6. Scope of our work

- 6.1 Staff and volunteers expected to be involved in Regulated Activity as defined in law will be recruited, selected and trained in accordance with the proper standards and all staff will receive appropriate safeguarding training that is professionally delivered and up to date. Staff and volunteers delivering Regulated Activity will also receive proper supervision. For further information on safer recruitment training visit www.saferrecruitmentconsortium.org.
- 6.2 The current contexts in which Alexandra Palace works with children and adults at risk are:
- 6.3 Creative Learning Programme: includes work with schools, people with special educational needs and learning disabilities, social and mental health needs, older people, people with dementia, young carers and more. We provide onsite and offsite workshops, digital learning, indoor and outdoor events, tours, handling collections and presentations, master classes and work experience placements.

We also have a safeguarding responsibility to our funders as stakeholders

- 6.4 Ice rink: Skating coaches and judges are required to apply to BISA annually for a membership license, the license requires them to be DBS checked attend safeguarding training, Alexandra Palace holds copies of all licenses and renewal documentation. NISA require coaches to follow a good practice guide. In addition, we engage licensed and registered Chaperones during Pantomime performances.
- 6.5 Within Alexandra Palace's Venue Management Plan (VMP) protocols are established detailing how a report of a lost child or adult at risk should be managed. A similar protocol exists as to how the venue will act when a child or adult at risk is found to be separated from their carer.

¹ DofE Statutory guidance on inter-agency working to safeguard and promote the welfare of children

- 6.6 For ticketed events such as concerts, age restrictions for unaccompanied children are assessed and agreed with promoters, before being made clear to customers at point of sale. Such age restrictions are enforced by Security Personnel on entry to the building.
- 6.7 Alexandra Palace sources security personnel and stewards from SIA Licensed companies. All SIA licensed security personnel have DBS checks as part of their licensing arrangements.
- 6.8 All medical staff supplied to the venue have DBS checks, this is a requirement of contract.
- 6.9 Alexandra Palace is working to achieve the White Ribbon Music award which aims to eliminate Violence against Women and Girls. This work aims to establish an environment whereby any complaints of harassment, violence or assault are received and managed by Alexandra Palace team members in a sensitive and appropriate manner.
- 6.10 Alexandra Palace is signed up to the safety initiative 'Ask for Angela' that is being rolled out to bars, clubs and other licensed businesses across London. People who feel unsafe, vulnerable or threatened can discreetly seek help by approaching venue staff and asking them for 'Angela'. This code-phrase will indicate to staff that they require help with their situation and a trained member of staff will then look to support and assist them. This might be through reuniting them with a friend, seeing them to a taxi, or by calling venue security and/or the police. The first point of contact should be our visitor services team.
- 6.11 We follow the Code of Fundraising Practice, relating to treating donors fairly – especially those who might be at increased risk of abuse <https://ciof.org.uk/events-and-training/resources/treating-donors-fairly>

Our legal obligations are covered by the Charities Act 2016, and in addition we pay an annual levy to The Fundraising Regulator and have signed up the Fundraising Code of Practice.

The Regulator can investigate complaints and escalate them as appropriate.
<https://www.fundraisingregulator.org.uk/directory?name=281991>

- 6.12 Safeguarding legislation places duties on organisations to co-operate to safeguard and promote the welfare of children. Alexandra Palace requires its leaseholders, Friend Groups, Societies contractors and partners, when working in partnership within the Park (a public space, open 24/7) and Palace, to safeguard and promote the welfare of children and adults at risk and to be committed to ensuring that their safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice.

7. Partnership working

Alexandra Palace will ensure that any formal or contractual relationships with partners, individuals, groups or organisations which involve contact with children or adults at risk include an obligation on the partner to:

- have appropriate safeguarding policies and procedures in place; and
- comply with its statutory and regulatory safeguarding obligations.

Contracts must clearly outline procedures and standards including:

- who has overall responsibility for safeguarding concerns;
- who is responsible for reporting and investigating safeguarding concerns; and
- the procedure to be following for dealing with safeguarding concerns.

Contracts with partners, individuals, groups or organisations must be in place before commencement of the work involving children or adults at risk.

8. Operating Safely Online

Alexandra Palace recognises that operating online carries specific safeguarding risks connected to protecting people from abuse and protecting sensitive information. We have in place measures to manage these risks, including:

- ensuring that all content on our website and/or social media accounts is suitable;
- limiting the number of people who are authorised to edit or post information on our website and social media accounts and changing passwords regularly;
- having controls on our social media accounts limiting who can post comments;
- monitoring what people do, say and share when using our online services;
- having in place policies and training for staff on keeping themselves safe online
- clearly explaining how users can report online concerns

We use advanced threat protection across devices and networks to mitigate risk of personal data breaches. As well as providing strict content filtering across all of our networks to prevent users from accessing explicit or inappropriate material on the internet. Our Free Wi-Fi Service is subject to terms and conditions and includes a usage policy.

The Charity Commission guidance sets out the requirements for charities to protect people from abuse when operating online <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees#operating-online>.

9. Safeguarding roles and responsibilities

- 9.1 The Board of Trustees has ultimate responsibility for ensuring Alexandra Palace complies with its safeguarding duties and obligations and safeguarding is a governance priority for the Trust.
- 9.2 Trustees receive training on safeguarding and trustee responsibilities and the Board reviews this policy every year. The Board maintains and regularly reviews the Risk Register, which includes risks relating to safeguarding.
- 9.3 The Designated Safeguarding Lead is responsible for:
 - adopting safeguarding guidelines through procedures and a Code of Conduct (**Appendix 3**) for staff and volunteers;
 - following carefully the procedures for recruitment and selection of staff and volunteers;
 - providing effective management for staff and volunteers through induction, supervision, support and training;
 - reporting information about concerns
 - sharing information about child protection and good practice with staff and volunteers;
 - reviewing its policies and practice at regular intervals,
 - Dealing effectively with any allegations made against staff and volunteers.
 - Making safeguarding reports to the appropriate agency or agencies (including social services, the LADO, Haringey Safeguarding Children's Partnership Board and Local Safeguarding Adult Board, the police, the DBS and/or the Charity Commission).
- 9.4 All staff have a role to play in delivering the aims of the Safeguarding Policy, but specific responsibility has been allocated to named staff as outlined below.
- 9.5 The CEO has responsibility for safeguarding and ensuring compliance with Charity Commission requirements and ensuring the Board and Executive team have ownership of safeguarding issues.
- 9.6 The Board will appoint a safeguarding trustee on the Board.
- 9.7 Director of HR and OD and Head of Creative Learning are responsible for ensuring that appropriate DBS checks are undertaken, up to date records maintained, appropriate checks and references are taken up for staff offered employment and ensuring that staff receive safeguarding training.
- 9.8 The Safeguarding Working Group is responsible for steering work in relation to safeguarding, reviewing the Safeguarding Policy and making recommendations to the Executive Team for any actions that need to be taken to maintain compliance and good practice.
- 9.9 All staff have a responsibility to report any concerns to their manager or Designated Safeguarding Lead. In event mode any concerns should be reported to event control and Venue I will take the operational lead for managing the response to safeguarding issues on site during event operation mode in line with venue protocols within the venue management plan. Venue I will be responsible for facilitating a timely response and or escalation to the Designated Safeguarding Lead.

10. Recruitment, vetting, induction and training of staff and trustees

- 10.1 Alexandra Palace recognises the need to adopt a consistent and thorough recruitment process in order to ensure that people who are unsuitable to work with children and adults at risk are prevented from doing so.
- 10.2 Alexandra Palace complies with an on-going duty to notify DBS with any relevant information regarding the conduct of any individual which the Alexandra Palace considers to have caused harm or pose a risk of harm to at risk groups.
- 10.3 Alexandra Palace will ensure that all trustees are subject to appropriate checks to ensure they are suitable for the role, in line with Charity Commission guidance. All new trustees will be provided with a copy of this policy and will be given information about safeguarding and protecting people.
- 10.4 Alexandra Palace will implement appropriate recruitment procedures for members of staff working on activities with children and/or adults at risk, having substantial access to children and/or adults at risk, access to children's personal information or images, or who through the course of their work are liable to find themselves in a position of trust. These procedures will include:

- DBS checks carried out by HR Department on the offer of a post which is likely to have regular contact with children and/or adults at risk.
- Two reference checks which confirm their suitability to work with children.
- Ensuring all existing staff regularly in contact with children, or unsupervised and or regulated activity, will have completed updated DBS checks.
- All staff contracts will refer to this policy about protecting children and adults at risk, and by signing contracts, staff will be confirming that they have received and read a copy of this policy.
- Members of staff are required to inform Alexandra Palace if they, their spouse or partner or their child is subject to a child protection investigation. Failure to do so could result in Disciplinary action;
- It is essential that all staff who have access to children and adults at risk understand their safeguarding responsibilities and what to do in the event a disclosure is made to them, or they suspect risk of harm or abuse. To aid this, all staff working with students, with children or likely to be in regular contact with adults at risk will receive training on safeguarding .
- All new starters will be inducted of the Safeguarding Procedure
- Alexandra Palace will ensure that staff know how to raise concerns and are supported in the process

10.5 For its widening participation, and outreach work Alexandra Palace will take the following steps:

- Only employ staff, where possible, who have actually been observed working with children or adults at risk (as appropriate)
- Ensure that a teacher, youth worker, care worker or other group leader from the host organisation is present during workshops delivered by Alexandra Palace.
- Provide visiting professionals with a copy of this policy.

11. Procedure for Managing a disclosure

11.1 Disclosing abuse is difficult for variety of reasons. Some children and adults at risk do not disclose because they feel they will not be believed or be taken seriously. It is very important that staff actively listen and respond sensitively. Creating a safe space to talk is crucial in breaking down barriers to disclosure.

11.2 The chart below shows some things to do and those not to do when speaking to someone making a disclosure

Do	Don't
<ul style="list-style-type: none"> • Listen carefully • Stay calm; • Recognise your feelings, but keep them to yourself; • Use language that the person can understand; • Reassure the person: telling them they are doing the right thing, they are not to blame, you believe that they are telling the truth; • Record what the person says and keep these notes; • Explain what you will do next (i.e., tell your manager or Designated Safeguarding Lead) in a simple and clear way • Follow the procedure set out in this policy in telling your manager or Designated Safeguarding Lead as soon as possible and within 24 hours and seeking advice and support for yourself. 	<ul style="list-style-type: none"> • Panic or delay in reporting the disclosure; • Express strong feelings of upset or anger; • Use jargon or express opinions; • Probe deeply for information; • Use leading questions; • Make them repeat the story; • Promise unconditional confidentiality; • Approach the person against whom the allegation has been made, or discuss the disclosure with anyone other than your manager or the Designated Safeguarding Lead.

12. Reporting a concern / disclosure against an Alexandra Palace staff member or volunteer

- 12.1 This procedure below will be followed whenever a disclosure has been made, or there is a suspicion that a child or adult at risk is at risk of harm or has been abused. If in doubt, or you have any question or concern you can contact the Designated Safeguarding Lead. If the line manager or Designated Safeguarding Lead fails to take appropriate action the matter should be escalated to the CEO.
- 12.2 The member of staff will make a detailed written record of the matter, using, if possible, the Safeguarding Report Form at **Appendix 4**, and report it within twenty-four hours to their line manager / safeguarding lead. In the case of an urgent concern, the member of staff will communicate the matter as soon as possible, and complete the written report afterwards.
- 12.3 The Designated Safeguarding Lead will seek advice from the Local Authority Designated Officer (LADO) where required to inform decision making about the appropriate course of action to be taken, sharing necessary information as appropriate to best protect the child or adult at risk, with their consent wherever possible.

- 12.4 Where risk of harm or abuse is identified, we will take action to best protect the child or adult at risk.
- 12.5 Alexandra Palace will involve the child or adult at risk in decision making and act with their consent where possible. The Designated Safeguarding Lead will take action without consent where this is considered to be in the best interests of the child or adult at risk.
- 12.6 If the matter is the subject of a criminal investigation Alexandra Palace is entitled to pursue its own or complementary confidential enquiries and disciplinary action providing this does not impact on the integrity of the police investigation or undermine the effectiveness of a criminal trial. . The Designated Safeguarding Lead will consult with the relevant agencies in such cases.
- 12.7 To maintain the integrity of the investigation, individuals who face an allegation may be advised to only discuss the substance of the allegation with his or her union or legal representative, immediate family or as directed by the investigating officer.
- 12.8 Following an investigation, disciplinary action may be taken as appropriate.
- 12.9 Information is shared and discussed between staff and relevant agencies on a need to-know basis only.

Appendix 5 provides a Flowchart for Reporting Safeguarding concerns.

13. Responding to Concerns

- 13.1 Deal with any immediate needs:
- Take all reasonable steps to ensure the child or adult at risk is in no immediate danger;
 - Seek medical treatment if required as a matter of urgency.
 - if you believe someone is at imminent risk of significant harm, you should call the police and/or an ambulance by ringing 999 and then report the matter in accordance with section 10 of this policy.
- 13.2 Listen carefully if a child or adult at risk discloses abuse to ensure that they are heard and not discouraged from reporting abuse. Clarify the bare facts of the reported abuse or grounds for suspicion of abuse but:
- It is not your role to interview the child or adult at risk;
 - Do not discuss in any circumstances the allegation of abuse with the alleged perpetrator.
- 13.3 Explain:
- That you must inform your line manager;
 - Tell the victim that others will have to be informed, e.g. Designated Safeguarding Lead, Local Authority Designated Officer (LADO) and the police;
 - Find out how the victim of abuse feels about informing others who might help, in particular LADO and the police.
- 13.4 Record:
Using the Safeguarding Report Form at **Appendix 4**, make an accurate factual written record of the allegation, or the grounds for suspecting abuse, including:
- The date and time of the incident;
 - What was said by the victim of abuse in their own words;
 - The appearance and behaviour of the victim;
 - Any injuries witnessed;
 - Anyone who was present at the time.

13.5 Inform:

- Your line manager as soon as possible and within 24 hours
- In the absence of your line manager, a senior manager, Event Control Designated Safeguarding Lead or Lead Site Security team member, or emergency services in an emergency. During an event, Venue 1 any concerns should be reported to event control and Venue 1 will take the operational lead for managing the response to safeguarding issues on site during event operation mode in line with venue protocols within the venue management plan. Venue 1 will be responsible for facilitating a timely response and or escalation to the Designated Safeguarding Lead.

13.6 What you should **not** do

- **Do not** confront the person you think is responsible for the abuse in the case of an event you should contact Lead Site Security Team Member;
- **Do not** destroy the evidence;
- **Do not** start to investigate the situation;
- **Do not** ignore even if the person does not want it to be disclosed.

14. Responsibilities of the line manager

14.1 Once the allegation or suspicion of abuse has been raised with the line manager (or other manager to whom a report is made under this policy), he or she must decide without delay, on the most appropriate course of action.

14.2 It is the duty of the line manager to:

a. Deal with any immediate needs:

- Ensure the victim of the alleged abuse is safe;
- Ensure that any necessary emergency medical treatment is arranged;
- Ensure that no forensic evidence is lost.

b. Clarify:

- The facts stated by the member of staff but **do not** discuss in any circumstances the allegation of abuse with the alleged perpetrator or if possible the victim;
- That the circumstances fall within the safeguarding procedures, i.e., meeting the definition of abuse as defined in this policy and procedures;
- Questions of consent and confidentiality as far as possible, e.g., has an assessment of capacity been made, is the alleged victim of abuse able to decide who should be informed

c. **Refer by completing the Safeguarding Report Form (Appendix 4) and submitting to the Designated Safeguarding Lead who informs the Local Authority Designated Officer (LADO)**

14.3 In the event of an accident or non-safeguarding related incident the standard Health and Safety reporting procedures should be followed. In regard to potential safeguarding incidents there are four main scenarios where the need to report is necessary.

14.4 If line managers have:

- a. Concern that a child or adult at risk attending Alexandra Palace event or Alexandra Palace related projects (including those in community-based settings) is being abused but by somebody not connected to Alexandra Palace.
- b. Concern that a child or adult at risk is being abused by an Alexandra Palace member of staff.
- c. A disclosure from a child or adult at risk that they are being abused by somebody not connected to Alexandra Palace.
- d. An allegation that somebody working at Alexandra Palace has abused a child or adult at risk.

they should inform their manager or Designated Safeguarding Lead.

14.5 If the circumstances involve a member of staff or volunteer the Designated Safeguarding Lead will seek advice from the Local Authority Designated Officer (LADO) and inform the CEO.

14.6 Do not inform parents if the abuse allegation concerns what is happening in the child's or adult at risk's home, seek advice from the Designated Safeguarding Lead.

- 14.7 Because it can be very difficult for a child to report that they are being abused, particularly while it is happening, it is important that any allegation is taken seriously, and everything is recorded factually and on the same day.
- 14.8 With regard to the action that should be taken when direct allegations are made, prior to the investigation, the Designated Safeguarding Lead may make a recommendation or obtain specialist independent advice on whether the allegation is one where suspension is necessary. If the decision is made to suspend an individual, this will not imply that the individual is guilty of any misconduct.
- 14.9 Alexandra Palace is aware that we have a responsibility both to the children / adults at risk and to the member of staff who has been accused. To be accused of abuse or inappropriate behaviour is an extremely traumatic experience for all concerned. The HR Department can arrange for counselling through our EAP package. All investigations will be undertaken fairly and without undue delay.
- 14.10 If the allegation about a member of staff is made to another member of staff it is important that this information is reported to the HR Department as soon as possible. Because of the rules of evidence with regard to criminal investigation, it is important that staff do not seek to interview the child, influence the parents or seek to stop the child from informing the statutory agencies. Such action can also be seen as conspiring to pervert the course of justice.
- 14.11 Failure to refer promptly may mean that vital evidence will be lost and result in more suffering to the child concerned, as well as potentially leaving other children at risk.
- 14.12 In certain circumstances it may not be appropriate for a member of Alexandra Palace staff to investigate an alleged incident themselves, in which case investigations must be left to appropriate professionals who will carry out an external investigation.
- 14.13 On occasion, the evidence needed to secure a conviction may not be available. The court requires allegations to be proven 'beyond reasonable doubt'. This is a high standard of proof. Following an allegation and investigation, a prosecution may not take place and even if a prosecution goes ahead, the person prosecuted may be acquitted. Employees need to be aware that regardless of whether a prosecution takes place, behaviour may still be in breach of our standards of conduct, and the allegations may be subject to an internal disciplinary process, subject to the advice of the LADO.

15. Whistleblowing

- 15.1 Alexandra Palace encourages all members of staff to raise any concerns that they may have about the conduct of others in the organisation in relation to any suspected instances of fraud, misconduct or wrongdoing. The Whistleblowing Policy and Procedures sets out Alexandra Palace position in these matters and lays out a procedure for individuals to raise any concerns and how those concerns will be dealt with.

16. Children Attending events / tours

- 16.1 Children attending events/tours / learning programmes at the park are the responsibility of their parents, carers, guardians, Responsible Adult, teachers or other persons who accompany them. Unaccompanied minors under the age of 14 will not be admitted. In the event that a child is reported as being separated from their adult carer, this should be reported to AP Control via radio or extension 2222 who will initiate the appropriate Alexandra Palace Lost Child / Adult at Risk protocol.
- 16.2 Children attending performances/events/tours and the park as part of a school or community group are the responsibility of the adult group leader at all times. A ratio of adults to children is required for all large groups.
- I: 3 for Early Years and Foundation students (2 to 5 years)
 - I: 6 for Years 1,2 and 3 (5-8 years)
 - I: 10 for Year 4 and above (9 upwards)

17. Procedure for lost children / adult at risk attending a performance, event or tour.

- 17.1 In the event that a child or adult at risk is found having been separated from their carer, the member of Alexandra Palace staff should contact AP Control via radio or extension 2222 who will implement Alexandra Palace's Found Child / adult at risk protocol. At all times, where practicable, we undertake that any lost child / adult at risk will be with at least two members of staff, preferably including one SIA licensed site security and in a public and visible place covered by CCTV.
- 17.2 The matter should be recorded and reported using the Control Daily Occurrence Book.

18. 'Abandoned' Children

- 18.1 If a child under the age of 14 is found in the building, and they are unaccompanied by an adult, it should be established if that child has been abandoned, if this is the case it should be reported to Alexandra Palace Control via radio or extension 2222 and the Found Child protocol as detailed in Venue Management plan should be initiated. The matter should be recorded and reported in the control Daily Occurrence Book.
- 18.2 NB: This procedure should only be used if the adult is not in the building, not if a parent and child have become separated.
- 18.3 No member of staff should accept responsibility for a child under any circumstances.

19. Unaccompanied Minors

- 19.1 Each event will have established through risk assessment and agreement with promoters/client, a lower age limit under which unaccompanied children will not be admitted to the venue.
- 19.2 Alexandra Palace Ice Rink does not admit unaccompanied minors to public sessions who appear to be 12 years or less. For patch ice or ice rink lessons, where a minor is below the public session age limit, children 12 and under can be left at the discretion of parent, guardian or responsible adult.
- 19.3 Unaccompanied minors in public areas of the building such as Palm Court, East Court and other public areas of the Palace and Park are left at the discretion of parent, guardian or responsible adult.
- 19.4 During daytime opening hours, security on duty should be alert for any unaccompanied minors entering the building.

20. Work Experience

- 20.1 Alexandra Palace considers applications for Work Experience on a case-by-case basis subject to the needs of the business.
- 20.2 The manager hosting a work experience placement must liaise with the HR Department to ensure there is an awareness of under-18 and over-18 work experience students in the building. This ensures risks can be managed and a standardised approach to ensure insurances, risk assessments and learning programmes are in place.
- 20.3 The manager / HR Department is responsible for ensuring, prior to the placement commencing, that the school, parent, carer or guardian of the child has completed a permission form for attendance on the work experience, and has been provided with an appropriate risk assessment and all documentation relevant to the placement.
- 20.4 The manager in whose department the young person is to undertake the work experience must ensure that the department has an up-to-date Risk Assessment for work experience placements and, for under-18s, an individual risk assessment which is signed, dated and specific to the individual young person.
- 20.5 HR is responsible for collecting emergency contact details from the parent, carer or guardian identified in the work experience application form. The supervising manager is responsible for advising the Work Experience Coordinator of any accidents or emergencies, and HR will inform the parent, carer or guardian or school in liaison with Head of Health Safety.
- 20.6 The manager in whose department the young person is to undertake the work experience must ensure that the members of staff who are working with or supervising that young person are briefed on their responsibilities and are competent to undertake that role.
- 20.7 Under DBS rules, staff supervising or working alongside children on work experience would not normally be required to undertake a DBS check. However, all staff must be aware of and must follow the code of conduct for dealing with children outlined above.
- 20.8 The manager in whose department the young person is to undertake the work experience must ensure he/she receives a Health and Safety induction and Health and Safety Risk Assessment. The manager must ensure that the young person is supervised at all times.

21. Sexual relationships

- 21.1 Under the Sexual Offences Act 2003, it is a criminal offence for a person to engage in a sexual relationship with a person under the age of 18 when they are in a position of trust in relation to that person. All staff are considered to be in a position of trust for this purpose. The Sexual Offences Act 2003 also makes it an offence for those engaged in providing care, assistance or services to an adult at risk to engage in sexual activity with that person.

22. Alcohol

- 22.1 It is illegal for alcohol to be sold to or bought by people who are under the age of 18 years. Alexandra Palace takes reasonable steps to seek to ensure that the law is not broken in relation to licensed premises and operates a Challenge 25 policy.

23. Associated documentation and further information

This document provides only a basic guide to safeguarding. Further advice and guidance can be obtained from the HR Department. The policy should be read in conjunction with the following documents:

- Code of conduct
- Capability policy and procedure
- Disciplinary policy and procedure
- Whistleblowing policy
- Bullying and harassment policy and procedure
- Recruitment and selection policy and procedure
- Training and induction policy
- Health and Safety policy
- Lone Working policy
- Equality, Diversity and Inclusion Policy
- Serious Incident Reporting
- Social Media Policy
- Data Protection Policy

24. Equality statement

Alexandra Palace is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, sex, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief, responsibilities for dependents, age, physical/mental disability or offending background.

We work to ensure that no one is unduly excluded through barriers to involvement, training, information and advice adapting our approach as required.

25. Data Protection

- 25.1 When an individual makes a disclosure or reports a concern under this Policy, Alexandra Palace will process any personal data collected in accordance with our data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

26. Status of policy

This procedure is a statement of current Alexandra Palace policy taking into account current legislation. Alexandra Palace therefore reserves the right to amend the procedure as necessary to meet any changing requirements.

Date	Version	Author	Amendments
02.10.18	V2	Catherine Solomon	Policy updated in light of legislative changes. Section 22 on Data Protection
09.01.19	V3	Catherine Solomon	Policy updated in light of Charity Commission Guidance 25/10/2018
14.02.19	V4	Catherine Solomon	Policy updated in light of legislative changes
06.03.20	V5	Catherine Solomon	Section 1 – A third paragraph was removed as it repeated what was already in the second paragraph.
			Section 5 – Dates have been updated to reflect updated publications of Charity Commission Guidance.
			6.9 – reworded to reflect obligation on ‘partners’ to commit to safeguarding and to also reflect that Alexandra Palace is open 24 hours a day, 7 days a week.
29.04.20	V6	Catherine Solomon	

APPENDIX 1: Detailed definitions

Child Abuse Definitions

There are four types of child abuse. They are defined in the Working Together to Safeguard Children 2018 **Appendix A** as follows:

1. Physical abuse
2. Emotional abuse
3. Sexual abuse
4. Neglect

Bullying is not defined as a form of abuse in Working Together but there is clear evidence that it is abusive and will include at least one, if not two, three or all four, of the defined categories of abuse. For this reason, it has been included in this factsheet.

The NSPCC's working definition of Child Abuse in this document - <https://learning.nspcc.org.uk/research-resources/briefings/definitions-signs-child-abuse>

Physical abuse

Physical abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- or ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Radicalisation and extremism

Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or reject and/or undermine contemporary ideas and expressions of freedom of choice. The threats to children take many forms, not only the high-profile incidents of those travelling to countries such as Syria and Iraq to fight, but on a much broader perspective also. The internet, in particular social media, is being used as a channel to promote and engage. Often this promotion glorifies violence, attracting and influencing many people including children and in the extreme cases, radicalising them. Children can be trusting and not necessarily appreciate bias that can lead to them being drawn into these groups and adopt these extremist views, and in viewing this shocking and extreme content may become normalised to it.

A definition of extremism can be found in Working Together to Safeguard Children 2018 **Appendix A**.

Bullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g., kicking, hitting, theft), verbal (e.g., racist or homophobic remarks, threats name calling) and emotional (e.g., isolating an individual from the activities and social acceptance peer group). The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti – bullying strategies.

Definitions taken from the document NSPCC Child Protection Fact Sheet - Definitions and signs of child abuse.

APPENDIX 2: Key Legislation

Children Act 2004

Section 10 requires each local authority to make arrangements to promote co-operation between the authority, each of the authority's relevant partners, and such other persons or bodies who exercise functions or are engaged in activities in relation to children in the local authority's area, as the authority considers appropriate. The arrangements are to be made with a view to improving the wellbeing of children in the authority's area – which includes protection from harm and neglect alongside other outcomes.

Section 11 places duties on a range of organisations and individuals to make arrangements for ensuring that their functions, and any services that they contract out to others, are discharged with regard to the need to safeguard and promote the welfare of children.

Children Act 1989

The intention of the Children Act is to protect children and ensure that their welfare and development is paramount and promoted. The Act allows for provision of services to support children and their families and for the compulsory intervention of the state to protect children. The act also gives local authorities a responsibility for ensuring that this happens by working together with all the relevant agencies. It states that only the Police, Social Services and the NSPCC have the legal right and responsibility to investigate concerns about child abuse.

For any updated modifications from 2004 onwards go to www.legislation.gov.uk - Children Act 1989.

Principles

- Paramount – the child's welfare is paramount – the most important consideration;
- Parental Responsibility – parents have a duty to care for their child and meet their needs;
- Partnership – professionals and families are to work together for the welfare of the children;
- Participation – children's wishes and feelings should be ascertained so that they can contribute appropriately;
- Prevention and Provision of Services – services may be necessary to safeguard and promote the welfare of a 'child in need';
- Protection – a child must be protected from serious harm. The Local Authority has a duty to investigate any report that a child is suffering or likely to suffer, 'Significant Harm'.

Section 17 – Child in Need

Under the Children Act (1989) a child is considered to be in need if:

- he/ she is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him/her of services by a local authority under this Part;
- his/her health or development is likely to be significantly impaired, or further impaired, without the provision for him/her of such services; or
- he/she is disabled.

Section 47 – Child at Risk of Significant Harm/In need of protection

Places a statutory duty on the local authority to investigate

Where a local authority has reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm, the authority shall make, or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare.

Significant Harm

In relation to children:

The Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

Physical Abuse, Sexual Abuse, Emotional Abuse and Neglect are all categories of Significant Harm.

Harm is defined as the ill treatment or impairment of health and development. This definition was clarified in section 120 of the Adoption and Children Act 2002 (implemented on 31 January 2005) so that it may include, "for example, impairment suffered from seeing or hearing the ill treatment of another".

Suspensions or allegations that a child is suffering or likely to suffer Significant Harm should result in an Assessment incorporating a Section 47 Enquiry

There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single violent episode may constitute significant harm but more often it is an accumulation of significant events, both acute and longstanding, which interrupt, damage or change the child's development.

The impact of harm upon a person will be individual and depend upon each person's circumstances and the severity, degree and impact or effect of this upon that person.

Police protection powers

Under section 46 of the Children Act 1989, where a police officer has reasonable cause to believe that a child would otherwise be likely to suffer significant harm, the officer may:

- remove the child to suitable accommodation and keep him there; or
- take reasonable steps to ensure that the child's removal from any hospital or other place in which the child is then being accommodated is prevented.

No child may be kept in police protection for more than 72 hours.

Emergency protection powers

The court may make an emergency protection order with respect to a child under section 44 of the Children Act 1989 on application by any person, if it is satisfied that there is reasonable cause to believe that a child is likely to suffer significant harm if the child:

- is not removed to different accommodation (provided by or on behalf of the applicant); or
- does not remain in the place in which the child is then being accommodated.

An emergency protection order may also be made by the court on the application of a local authority or an authorised person (i.e., a person authorised to apply to the court for care orders or supervision orders under section 31 of the Act) if the court is satisfied that:

- enquires being made with respect to the child (in the case of a local authority, under section 47 (1) (b) of the Act) are being frustrated by access to the child being unreasonably refused to a person authorised to seek access, and
- the applicant has reasonable cause to believe that access is needed as a matter of urgency.

In addition, where the applicant is an authorised person, the court must be satisfied that the applicant has reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

An emergency protection order gives authority to remove a child to accommodation provided by or on behalf of the applicant and place the child under the protection of the applicant, amongst other things.

Working Together to Safeguard Children

This document sets out how all agencies and professionals in the statutory, voluntary and independent sectors should work together to promote children's welfare and protect them from abuse and neglect and requires those agencies to share information. This document was updated in July 2018.

The United Nations Convention on the Rights of the Child

The United Nations Convention sets out the rights of all children, including their right to be protected from harm.

Making Safeguarding Personal (MSP) guide – for adults at risk

<https://www.local.gov.uk/sites/default/files/documents/Making%20Safeguarding%20Personal%20-%20Guide%202014.pdf>

Rehabilitation of Offenders Act 1974

This act allows people not to declare convictions to employers. People who are involved in situations where they have sustained or prolonged access to children are exempt from the Rehabilitation of Offenders legislation. This means that prospective employees, self-employed workers and volunteers must declare all criminal convictions relating to children, however long ago: and that these will be taken into account when deciding on their suitability for working with children. NB: verification of Criminal Records will be obtained in all cases from the DBS.

Health and Safety at Work Act 1974

The Health and Safety at Work Act gives all organisations a legal responsibility to prevent injuries and ill health to employees and others, including members of the public. Much of this responsibility is delegated to managers who have control of work activities, but the legislation also provides all employees with an obligation to take reasonable care of themselves and others.

Youth Justice and Criminal Evidence Act 1999

Working together to achieve best evidence in relation to vulnerable and intimidated witnesses, which includes children. NB: all young people under 17 are always classed as vulnerable witnesses in cases of violent and sexual offences.

Safeguarding Vulnerable Groups Act 2006

This piece of legislation was created following the UK Government accepting recommendation 19 of the inquiry headed by Sir Michael Richard, which was set up in the wake of the Soham Murders.

The Safeguarding Vulnerable Groups Act establishes the legal basis for the two DBS managed lists of people barred from working with children and/or adults at risk replacing the current barred lists (List 99, the Protection of Children Act 1999 (PcCA), the scheme relating to the Protection of Vulnerable Adults (PoVA) and Disqualification Orders). The Safeguarding Vulnerable Groups Act also places a statutory duty on all those working with at risk groups to register and undergo an advanced vetting process with criminal sanctions for non-compliance.

The Sexual Offences Act 2003

Introduced the offences of:

- causing or inciting a child to engage in sexual activity
- engaging in sexual activity in the presence of a child
- causing a child to watch as sexual act
- meeting a child following sexual grooming
- arranging or facilitating a child sexual offence

Abuse of Position of Trust

The Sexual Offences Act (2003) re-enacts and extends the abuse of position of trust to include;

An offence for any person aged 18 or over, who is in a 'position of trust', to have a sexual relationship with a young person under 18 if their role is one identified within the Act. These include staff working in;

- Institutions looking after children detained under a court order
- Accommodation provided by local authorities / voluntary organisations under statutory provision
- Hospitals, clinics, children's homes and residential family centres
- Education institutions

Protection of Freedoms Act 2012

- Formed DBS in 2012 from ISA and CRB
- Safer recruitment for public, private and voluntary sectors by identifying candidates unsuitable for working with children and adults at risk
- Covers England and Wales
- 'Regulated Activity' employers legally required to refer safeguarding concerns
- Illegal for a person barred by DBS to apply or work within the sector or for an employer to knowingly employ someone barred by the DBS.

Female Genital Mutilation Act 2003

Female Genital Mutilation [FGM] is a form of violence against women and girls. It involves the ritual cutting or removal of some or all of the external female genitalia.

It is illegal for anyone to perform FGM in the UK. The Act makes clear that it is an offence for any person regardless of their nationality or residence status, to perform FGM in England and Wales, assist a girl to carry out FGM on herself or assist a non-UK national or UK resident to carry out FGM outside of the UK on a UK national or UK resident. In addition, there is also a separate offence of failing to protect a girl from the risk of FGM.

All types of FGM constitute Significant Harm as defined in the Children Act 1989.

A girl or a relevant party (such as a local authority) can apply to the court for a Female Genital Mutilation Protection Order. This is an order which can protect a girl at risk of FGM.

Child Sexual Exploitation

CSE is defined in the Department of Education Guidance entitled 'Child Sexual exploitation Definition and guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation' published in February 2017 and it says:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g., food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative

relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

This definition of child sexual exploitation was created by the UK National Working Group for Sexually Exploited Children and Young People (NWG) and is used in statutory guidance for England.

Counter-Terrorism and Security Act 2015

The Counter-Terrorism and Security Act 2015 introduced a new duty on regulated higher education bodies to have due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent Duty. The aim of the Prevent strategy is to reduce the threat to the UK from all forms of terrorism by stopping people becoming terrorists or supporting terrorism.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Radicalisation is usually a process not an event. During this process, there will inevitably be opportunities to intervene in order to reduce the risk of the individual being attracted to extremist ideology and causes and safeguard him/her from the risk of radicalisation. It is important to be able to recognise the factors that might contribute towards the radicalisation of an individual. Indeed, some of the factors that lead an individual to becoming radicalised are no different to those that might lead individuals towards involvement with or being vulnerable to other activity such as gangs, drugs and sexual exploitation for example.

Those involved in extremist activity come from a range of backgrounds and experiences.

There is no single profile of what an extremist looks like or what might drive a young person towards becoming radicalised. It can affect impressionable young boys and men and also impressionable young girls and women.

Mental Capacity Act 2005

An assessment to establish whether a person lacks capacity should take place whenever there is a concern that an individual might lack the mental capacity to make a proposed decision (including safeguarding).

Processes for people who lack capacity should be different in significant respects from processes undertaken with people who have capacity (e.g., in relation to sharing information and consent).

The principles of the Mental Capacity Act make it clear that a person is not to be treated as unable to make a decision unless all practical steps have been taken to help them do so, and that no one should be deemed to lack capacity on the grounds that their decisions appear to be unwise.

Care Act 2014

The Act sets out the legal framework for the provision of adult social care. It includes the general responsibility of local authorities to promote the wellbeing of adults in need of care and support and with his partners, to safeguard such adults from abuse or neglect. Local authorities must make enquiries, or to ask others to make enquiries, where they reasonably suspect that an adult in its area is at risk of neglect or abuse, including financial abuse. The purpose of the enquiry is to establish with the individual and/or their representatives, what, if any, action is required in relation to the situation; and to establish who should take such action. The duty applies to adults who have care and support needs (regardless of whether they are currently receiving support, from the local authority or indeed anyone); and who are at risk of or experiencing neglect or abuse, including financial abuse; but are unable to protect themselves.

Care and Support Guidance

Care and Support Statutory Guidance (Updated January 2022) Chapter 14 provides guidance to agencies on the requirements and arrangements for safeguarding adults at risk of or experiencing abuse or neglect.

Statutory Guidance:

Working Together to Safeguard Children (July 2018);
Keeping Children Safe in Education (Updated September 2021);

Charity Commission Guidance: Safeguarding and protecting people for charities and trustees (published 6 December 2017 and last updated 17 November 2021)

How to report a serious incident in your charity (published 2 June 2014 and last updated 14 June 2019)
Reporting a serious incident in your charity when it involves a partner (published 19 December 2019)

APPENDIX 3: Code of Conduct

No member of staff shall engage in sexual contact or in any relationship with a child other than a properly conducted staff-to-young person relationship. This condition applies regardless of the age of the child and, even if they are over the age of consent.

No member of staff shall engage in conduct towards a child or adult at risk that is intended to be oppressive, threatening, manipulative or in any way improper or with a view to causing the child or adult at risk physical or emotional harm or sexual harm.

It is the primary duty of every member of staff to ensure the safety and wellbeing of every child and adult at risk whilst on site. Each member of staff must ensure that all reasonable steps are taken to minimise risk of harm or injury to any child or adult at risk and must abide by the policies, procedures and guidelines set out in this document.

Where there is any reason for believing that a child or adult at risk has been abused, is being abused or is at risk of being abused, in any way arising as a result of that person's association with Alexandra Palace, it shall be the duty of any member of staff to whom that information is made known to take action at once, according to the reporting procedures section 10.

Any instance of inappropriate behaviour towards a child or adult at risk, by any person employed by Alexandra Palace will be the subject of an enquiry, which may involve external statutory authorities. Alexandra Palace will always seek and adhere to advice from the Local Authority Designated Officer (LADO). The report of any enquiry will be presented to the CEO who will decide what further action is necessary and whether there are sufficient grounds to institute disciplinary proceedings. This will take place whether the Police choose to prosecute or not.

A member of staff who finds him/herself alone with a child must exercise particular care. There should be no apprehensiveness in the mind of either person if such a situation arises, but physical contact should be avoided or appropriate to the nature of work and the situation whenever possible and the presence of an additional person sought as soon as reasonably practicable.

Children must at all times be treated with respect in attitude, language and behaviour. Sexual innuendo whether by word or gesture is prohibited.

No person under the age of 18 years shall have the responsibility for supervising any other child.

Alexandra Palace works with a variety of media to promote understanding and engagement with its work. Children should not be photographed or filmed without prior permission from their teacher, parent or guardian. In use of this material the following guidelines should be considered:

- Photographs of children must be retained and stored in an appropriate manner and only used for legitimate Alexandra Palace purposes;
- The use of both a child's first and last name in photographs, captions and file names, identifiable logos e.g. school badges should be avoided;
- Group pictures rather than individuals should be used wherever possible;
- Only images of children in suitable dress should be used to reduce the risk of inappropriate use;
- A media consent form should be completed.

Relevant Heads of Department who are involved in media activities are responsible for developing departmental procedures to ensure that these guidelines are implemented in their area of responsibility.

Staff should not accept children below 18 years of age who they have met through their work as 'friends' on social networking sites. Neither should they divulge private email addresses or telephone numbers to these children. Staff should not publish pictures on social networking sites of their work that involves children.

In working with children staff should be aware of the Good Practice guidelines below. Good practice creates a positive child protection climate and assists in protecting staff from false allegations of abuse.

Good Practice:

- Always working in and encouraging an open environment (e.g., no secrets)
- Treating all children and adults at risk equally, with respect and dignity;
- Always putting the welfare of children and adults at risk first;
- Maintaining a safe and appropriate distance except where it is an essential part of the process;
- Building a balanced relationship based on mutual trust which empowers children and adults at risk;
- Ensuring that any form of manual assistance or physical support is provided openly. Children and parents, guardians or carers should be consulted and their agreement gained.
- Involve parents, guardians, carers and chaperones wherever possible;
- If groups have to be supervised do so in pairs where practicable;
- Being an excellent role model, this includes not smoking or drinking alcohol in the company of children;
- Record any injuries sustained accurately in line with Alexandra Palace accident reporting policy.

Practice to be avoided:

- Avoid spending time alone with children and adults at risk away from others;
- Avoid association (outside the work environment) with children and adults at risk you have met at work;

Practice never to be allowed:

- Engage in rough, physical or sexually provocative games, including horseplay;
- Allow or engage in any form of inappropriate touching;
- Allow children to use inappropriate language unchallenged;
- Allow adults to use inappropriate language in the presence of children or adults at risk unchallenged;
- Make sexually suggestive comments to a child or adult at risk, even in fun;
- Reduce a child to tears as a form of control;
- Allow allegations made by a child or adult at risk to go unchallenged, unrecorded or not acted upon;
- Do things of a personal nature for children or adults at risk that they can do by themselves;
- Invite or allow children or adults at risk to stay with you at your home unsupervised.

APPENDIX 4 SAFEGUARDING REPORTING FORM

This form is to be used to report all safeguarding concerns about a child or adult at risk

**If a child or adult at risk is in immediate danger call 999
Take all reasonable steps to remove the child or adult at risk out of immediate danger
Seek medical assistance if required as a matter of urgency**

For all cases complete this form and refer to **Designated Safeguarding Lead**

SECTION 1 – CHILD / ADULT AT RISK’S DETAILS

Name _____

Date of Birth _____ (dd/mm/yy)

Gender Male Female

Address

Contact number _____

Where relevant

Name of Parent / Carer _____

SECTION 2 – DETAILS OF THE SAFEGUARDING CONCERN

Date of alleged abuse _____ (dd/mm/yy)

Please describe what happened including: who was there, who raised the concern, what time was the disclosure made, what was said, what was done and by whom, and any other specific factors or information that you know of e.g., Location and or name of event or activity

Manager’s signature: _____

Date: _____

To whom did you disclose the details of the incident?

Does the child / adult at risk know that this report has been made?

Yes No

Does the child / adult at risk consent to this report being made?

Yes No

SECTION 3 – YOUR DETAILS

Employee's name: _____

Department: _____

Contact number _____

I confirm that the information and details given above are an accurate reflection of the issues and concerns raised

Signed employee: _____

Date:

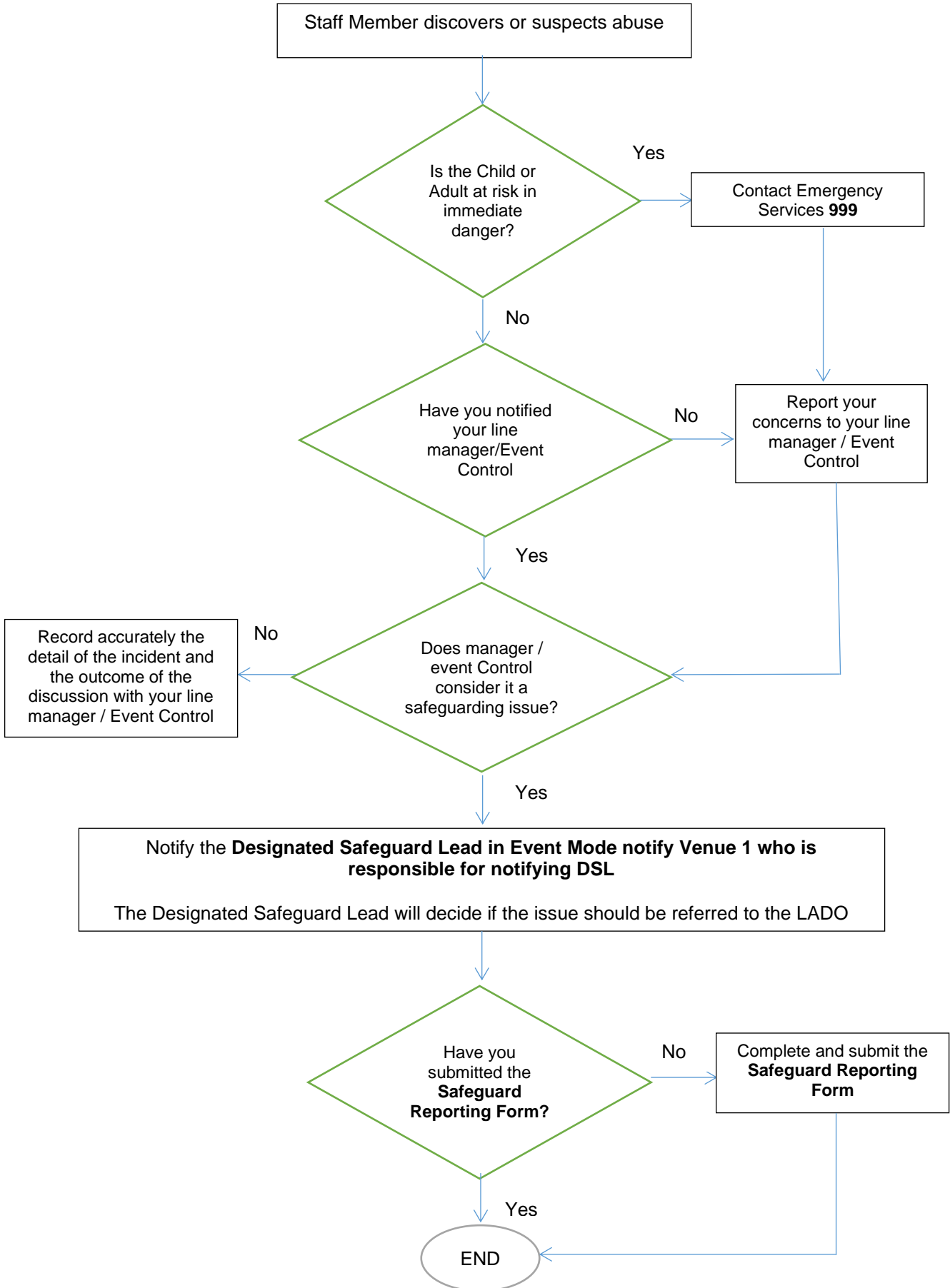
FOR HR USE ONLY

Received by Designated Safeguarding Leader

Signed _____

Date:

APPENDIX 5 Safeguarding Reporting – Flowchart





ALEXANDRA PARK AND PALACE CHARITABLE TRUST

Whistleblowing Policy

1. Introduction

This document sets out the Whistleblowing Policy of Alexandra Park and Palace Charitable Trust and its trading subsidiary APTL hereafter known as Alexandra Palace.

2. Background

This policy outlines what you should do if you suspect something happening at work is putting you or others in danger, or is illegal or unethical.

The law provides protection for individuals who raise legitimate concerns about specified matters. This means that they have the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by an individual who has a reasonable belief that one of the following acts is being, has been, or is likely to be, committed:

- a criminal offence;
- a miscarriage of justice;
- an act or omission creating risk to health and safety;
- an act or omission causing damage to the environment e.g. Pollution incident;
- financial irregularities;
- concerns regarding fundraising practice;
- act of bribery;
- a breach of any other legal obligation; or
- concealment of any of the above.

This list is not exhaustive and, as we are a charity, we need to be transparent in all that we do in order to ensure our reputation and public confidence are maintained. This means that the definition of what might be in the public interest is broad. Please speak to the Director of HR and OD if you are not sure whether something you have become aware of is covered by this policy.

It is not necessary for you to have proof that activity of the sort listed above is being, has been, or is likely to be, committed - a reasonable belief is sufficient. You have no responsibility for investigating the matter; Alexandra Palace has responsibility to ensure that an investigation takes place.

3. Scope

This policy applies to all staff, whether full-time, part-time, on a fixed term or a casual contract. It also covers volunteers and those who are providing services or performing work, such as agency workers and contractors. All of the listed individuals are encouraged to use this policy.

This policy does not cover disclosures about employees' personal circumstances, treatment at work or potential breaches of their contract of employment. If an employee wishes to make a complaint about their employment or how they have been treated in the workplace, they should use the following policies:

- Anti-Bullying and Harassment Policy;
- Equality Diversity and Inclusion Policy;
- Grievance Policy.

4. Policy

It is our policy that any fraud, misconduct or wrongdoing is reported and properly dealt with. Alexandra Palace therefore encourages you to raise any concerns that you may have about the conduct of others in the organisation or the way in which the organisation is run. This policy sets out the procedure under which you may raise concerns and how those concerns will be dealt with.

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Individuals should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of. Any matter raised will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation reported back to the individual who raised the issue.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter following the procedure below.

No individual will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the individual will not be prejudiced because he/she has raised a legitimate concern. Victimisation of an individual for raising a qualified disclosure will be dealt with under the disciplinary procedure.

If misconduct is discovered as a result of any investigation under this procedure, such misconduct will be dealt with under the Alexandra Palace disciplinary procedure, in addition to any other appropriate internal or external measures. External measures may include reporting to the appropriate external agency, such as our regulator, the Charity Commission.

We want you to be assured that there will be no reprisals for raising concerns that you reasonably believe are made in the public interest, even if we establish through our investigations that you are mistaken. However, there may be occasions where false allegations are made in bad faith. Such cases will be dealt with under our disciplinary policy and may result in dismissal for gross misconduct.

5. Procedure

We encourage you to raise your concerns under this procedure in the first instance. If you are not sure whether or not to raise a concern, you should discuss the issue with your line manager or the Director of HR and OD.

Stage 1 Raising concerns

In the first instance, any concerns should be raised with your line manager, either in person or in writing. This is unless you reasonably believe your line manager to be involved in the wrongdoing, or if for any other reason you do not wish to approach your line manager. If you believe your line manager to be involved, or for any reason do not wish to approach the line manager, then you should proceed straight to stage 3. You should also do this if your concerns are of a very serious nature.

You are always encouraged to raise concerns openly, and if you prefer to do so in confidence, Alexandra Palace will do all that we can to ensure your identity remains hidden. We may want to disclose your identity to people involved in the investigation, but will always discuss this with you first.

Alexandra Palace discourages anonymous whistleblowing. Concerns raised anonymously are very difficult (and sometimes impossible) to investigate. Alexandra Palace cannot properly establish whether allegations are credible without being able to ask for more details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymously.

Stage 2 How Alexandra Palace will handle the matter

When advised of a concern or on receipt of a complaint, you will be invited to a meeting to discuss your concerns. You are entitled to be accompanied at this meeting and any subsequent meeting by a colleague or a trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.

Alexandra Palace will then investigate your concerns and we may ask you to attend further meetings. If you reported your concern to your manager, it may be your manager who investigates in the first instance. In doing so, they will take every

possible step to maintain your anonymity, should you wish for your identity to remain hidden. Alexandra Palace will then decide what further action might be appropriate.

Alexandra Palace will advise you who will be handling the matter, how to contact them, what further assistance that may be needed and agree a timetable for feedback. When requested, Alexandra Palace will write to you summarising the concern and setting out the proposal for handling the concern. Please note, however, that it may not always be possible to inform you about the precise actions Alexandra Palace will take where this would infringe on a duty of confidence owed to another person.

Stage 3 Escalation of concerns

If you are concerned that your line manager is involved in the wrongdoing, if the concern is very serious, or if you feel that your concerns have not been addressed properly under stage 1 or 2, you should contact one of the following:

- 1) the Director of HR and OD;
- 2) the Whistle blowing hotline by telephone: **020 8365 4555** or by emailing whistleblowing@alexandrapalace.com;
- 3) the Trustee Board Lead Member for Whistleblowing, who will arrange for another manager to review the investigation carried out, make any necessary enquiries, and make his/her own report to the Board.

6. Reporting the matter to an external agency

This policy describes the process for raising and dealing with whistleblowing complaints. It will rarely be necessary for anyone outside Alexandra Palace to become involved when a whistleblowing allegation is made. However, if on conclusion of stages 1, 2 and 3, you reasonably believe that the appropriate action has not been taken, it may be appropriate for you to report your concerns to an external body such as our regulator, the Charity Commission.

The Charity Commission provides guidance on how to report a serious issue directly to the regulator if the individual does not wish to speak to anyone in the Charity - <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>.

The Charity Commission advises seeking advice from independent charity **Protect** before approaching any external agency: 0800 055 7214 www.pcaaw.co.uk or by email at whistle@protect-advice.org.uk.

8. Employee Assistance Programme

Alexandra Palace also provides an employee assistance programme that offers confidential support service and advice on personal issues and work-related issues.

Employees can contact the service, 24 hours a day 7 days a week on 0800 047 4097.

9. Associated documentation and further information

The policy should be read in conjunction with the following documents:

- Grievance Policy
- Anti-Bullying and Harassment Policy
- Code of Conduct
- Serious Incident Reporting Policy
- Health and Safety Policy

For further information on concerns around Fundraising practice:

<https://www.fundraisingregulator.org.uk/wp-content/uploads/2017/02/Consultation-responses-summary-and-code-changes-1.pdf>

10. Data protection

When an individual makes a disclosure, Alexandra Palace will process any personal data collected in accordance with our data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

11. Status of policy

This procedure is a statement of current Alexandra Palace policy taking into account current legislation. Alexandra Palace therefore reserves the right to amend the procedure as necessary to meet any changing requirements.

Created: June 2017,
Approved: APPCT 18.07.2017
Reviews: October 2017, August & Sept. 2018, March 2019, June 2019, March 2020, January 2022

Significant adjustments made:

June 2019		Independent advice charity details amended & Charity Commission details added
03.10.2017	V2	Includes reference to fundraising code and fundraising practice
02.08.18	V3	Data Protection section 13 added
18.09.18	V4	Direct phone number & email address added
11.03.19	V5	Independent advice amendments ('Protect', formerly 'Public Concern at Work')
25.06.19	V6	Stage 3 Charity Commission guidance link added
16.03.2020	V7	Removal of harassment in section 2 bullet points as not a protected disclosure and dealt with under separate policy
04.07.22	V8	<ul style="list-style-type: none">- More encouragement to make disclosures and in the appropriate way, e.g. setting out the right to be accompanied to meetings, clarifying what happens if the whistle-blower is mistaken, emphasising the need to make disclosures in good faith, explaining the limitations when responding to anonymous disclosures; Stronger discouragement to take concerns to external bodies.- There is no longer a requirement for a qualifying disclosure to be made. The current position is that a disclosure will be a qualifying disclosure if the person(s) stated in para 3, has a reasonable belief, that it is made in the public interest.

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