

NOTICE OF MEETING

ALEXANDRA PALACE AND PARK BOARD

Monday, 23rd March, 2020, 7.30 pm - Transmitter Hall, Alexandra Palace Way, Wood Green, London N22 7AY

Members: Councillors Anne Stennett (Chair), Eldridge Culverwell (Vice-Chair), Dana Carlin, Nick da Costa, Bob Hare and Sarah Williams

Co-optees/Non Voting Members: Jason Beazley (Three Avenues Residents Association (TARA)), Duncan Neill (Muswell Hill and Fortis Green Association), Val Paley (Palace View Residents' Association) and Nigel Willmott (Friends of the Alexandra Palace Theatre)

Quorum: 3

1. **FILMING AT MEETINGS**

Please note that this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual or may lead to the breach of a legal obligation by the Council.

2. **APOLOGIES FOR ABSENCE**

3. **URGENT BUSINESS**

The Chair will consider the admission of any late items of urgent business. (Late items will be considered under the agenda item where they appear. New items will be dealt with at items 12 & 21 below)

4. DECLARATIONS OF INTERESTS

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct.

5. QUESTIONS, DEPUTATIONS OR PETITIONS

To consider any questions, deputations or petitions received in accordance with Part 4, Section B29 of the Council's Constitution.

6. MINUTES (PAGES 1 - 4)

To confirm the unrestricted minutes of the Alexandra Palace and Park Board held on 14 January 2020 as an accurate record of the proceedings.

7. TO CONSIDER ANY ADVICE OR COMMENTS FROM RECENT SAC/CC MEETINGS (PAGES 5 - 12)

To note the minutes of the Alexandra Park and Palace Statutory Advisory Committee and the Joint Alexandra Park and Palace Statutory Advisory Committee and Alexandra Palace and Park Consultative Committee held on 10 December 2020 and any advice or comments contained therein.

8. REPORT FROM THE CHAIR OF THE FRRAC (PAGES 13 - 14)

To note the feedback from the FRRAC.

9. TRUST FINANCIAL RESULTS (PAGES 15 - 20)

To consider and note the financial performance.

10. FUTURE OF THE FRIENDS OF ALEXANDRA PALACE THEATRE GROUP (PAGES 21 - 30)

To consider (and agree) the recommendations.

11. ANNUAL REVIEW OF POLICIES (PAGES 31 - 92)

To adopt the updated key policies.

Cover report to follow

12. ANY OTHER UNRESTRICTED BUSINESS THE CHAIR CONSIDERS TO BE URGENT

13. FUTURE MEETINGS

To be confirmed following the Full Council meeting on 19 March 2020.

14. EXCLUSION OF THE PUBLIC AND PRESS

Items 15 - 21 are likely to be subject of a motion to exclude the press and public from the meeting as they contain exempt information as defined in Section 100a of the Local Government Act 1972; Para 1 – information relating to any individual, Para 2 – Information which is likely to reveal the identity of an individual, Para 3 - information relating to the business or financial affairs of any particular person (including the authority holding that information), and Para 5 – Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

15. EXEMPT MINUTES (PAGES 93 - 94)

To confirm the exempt minutes of the Alexandra Palace and Park Board held on 14 January 2020 as an accurate record of the proceedings.

To confirm the exempt minutes of the Alexandra Palace and Park Panel held on 27 February 2020 as an accurate record of the proceedings. **TO FOLLOW**

16. EXEMPT - 2020 PAY REVIEW (PAGES 95 - 120)

To approve the recommendations in the report.

17. EXEMPT - FIVE-YEAR STRATEGIC PLAN (PAGES 121 - 136)

To approve the recommendations in the report.

18. EXEMPT - 2020/21 DRAFT BUDGET (PAGES 137 - 142)

To approve the recommendations in the report.

19. EXEMPT - APTL CHAIR'S FEEDBACK REPORT (PAGES 143 - 144)

20. EXEMPT - VERBAL UPDATE ON TRUST MATTERS

21. ANY OTHER EXEMPT BUSINESS THE CHAIR CONSIDERS TO BE URGENT

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Assistant Director – Corporate Governance and Monitoring Officer
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Friday, 13 March 2020

**MINUTES OF MEETING ALEXANDRA PALACE AND PARK
BOARD HELD ON TUESDAY, 14TH JANUARY, 2020, 7.30 - 9.20
PM**

PRESENT:

**Councillors: Anne Stennett (Chair), Eldridge Culverwell (Vice-Chair),
Dana Carlin, Nick da Costa, Bob Hare and Sarah Williams**

Non-voting members: Duncan Neill, Val Paley and Nigel Willmott

1. FILMING AT MEETINGS

The meeting was not filmed or recorded.

2. APOLOGIES FOR ABSENCE

Apologies for absence were received from Jason Beazley.

Apologies for lateness were received from Councillor Williams.

3. URGENT BUSINESS

There was one item of urgent business - Execution of APTL User Agreement. This would be discussed under item 11 of the agenda.

4. DECLARATIONS OF INTERESTS

None.

5. QUESTIONS, DEPUTATIONS OR PETITIONS

None received.

6. MINUTES

RESOLVED that

- i. The minutes of the Alexandra Palace and Park Board held on 8 October 2019 be approved;
- ii. The minutes of the Alexandra Palace and Park Board held on 10 December 2019 be approved;
- iii. The minutes of the Alexandra Park and Palace Statutory Advisory Committee held on 10 December 2019 be noted; and
- iv. The minutes of the joint Alexandra Park and Palace Statutory Advisory Committee and Alexandra Palace and Park Consultative Committee be noted.

7. REPORT FROM THE CHAIR OF THE FINANCE, RISK, RESOURCE AND AUDIT COMMITTEE

RESOLVED that the feedback from the Finance, Risk, Resource and Audit Committee be noted.

8. TRUST FINANCIAL RESULTS

Dorota Dominiczak, Director of Finance and Resources, introduced the report as set out. The Trading Company had made good progress towards the ambitious fundraising target.

Section 11 highlighted the known risks for 2020/21 – a possible cut in the Corporate Trustee grant and some contractual costs. The Finance team were currently working on the budget for 2020/21 to factor in the reduction of the grant, and this would be discussed at the Finance, Risk, Resources and Audit Committee (FRRAC) and presented to the next Board meeting.

RESOLVED that the financial performance of the Trust and the pressure on the Trust's 2019/20 budget be noted.

9. CEO REPORT

Louise Stewart, Chief Executive, introduced the report as set out. The parking consultation had ended, with over 2000 responses. The responses were predominantly from local residents. There were early indications that there was a good level of detailed useful feedback in key areas. The results would be analysed and reported back at a future meeting.

The Trust had received funding from Arts Council England, this was a new funding relationship for the Trust.

Work was being undertaken to resolve broken lighting in the park and to address enquiries and complaints received.

A digital asset management system was in the process of being rolled out across the organisation for archiving materials. This system would have an internal interface that would currently cover the back office, but eventually would contain a public access element. In response to a Board Member, Emma Dagnes advised that the system would start as a basic public asset platform but there could be scope to include a retail element.

RESOLVED that the report be noted.

10. FABRIC MAINTENANCE PLAN (FMP)

Emma Dagnes, Deputy Chief Executive, introduced the report as set out. Prior to the meeting the Board had carried out a tour of the building to view some of the priority areas identified in the Fabric Maintenance Plan (FMP).

In response to questions it was noted:

- Refurbishment of the ladies' toilets in the Phoenix Bar is on the priority list but had been deferred due to other emergency repair works required during December. A decision needed to be made as to whether a small refurbishment would suffice, or if a full redesign was required. The Head of Facilities was exploring replacing the splashback at the sinks. Louise Stewart advised that the organisation was getting better at communicating to the public on site when there was a refurbishment or repair happening or required and its status.
- The overarching position of the FMP had not changed significantly from last year. Some parts of the building had not been looked at due to budget.
- The aim was to complete the East Court project fully before embarking on other projects.
- Meanwhile uses for certain parts of the building had been explored but some of the uses discussed were not currently financially viable.
- The FMP was reviewed by the Building Manager every two months.

RESOLVED that

- i. **The progress made in 2019/20 be noted; and**
- ii. **Adjustments to priorities be approved.**

11. ANY OTHER UNRESTRICTED BUSINESS THE CHAIR CONSIDERS TO BE URGENT

The Chair introduced the report as set out. The Board had taken a decision at its' meeting on 8 October 2019 to approve an updated APTL User Agreement to commence in April 2020, however the recommendations had omitted the Board's explicit approval for the Council's Legal Services team to execute and seal the new agreement.

RESOLVED that the London Borough of Haringey's Assistant Director of Corporate Governance be authorised to seal the APTL User Agreement, which was approved by the trustee board on 8th October 2019.

12. FUTURE MEETINGS

24 March 2020

13. EXCLUSION OF THE PUBLIC AND PRESS

RESOLVED that the press and public be excluded from the meeting for the consideration of items 14-18 as they contained exempt information as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); Para 1 – information relating to any individual, Para 2 – Information which is likely to reveal the identity of an individual, Para 3 - information relating to the business or financial affairs of any particular person (including the authority holding that information), and Para 5 - Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

14. MINUTES

RESOLVED that

- i. The minutes of the Alexandra Palace and Park Board held on 8 October 2019 be approved; and**
- ii. The minutes of the Alexandra Palace and Park Board held on 10 December be approved.**

15. EXEMPT LEASEHOLD PROPERTY REVIEW

The recommendations in the report were approved.

16. EXEMPT ESTATE GUARDING CONTRACT

The recommendations in the report were approved.

17. EXEMPT APTL CHAIR'S FEEDBACK REPORT

The recommendations in the report were approved.

18. ANY OTHER EXEMPT BUSINESS THE CHAIR CONSIDERS TO BE URGENT

None.

CHAIR: Councillor Anne Stennett

Signed by Chair

Date

MINUTES OF MEETING ALEXANDRA PARK AND PALACE ADVISORY COMMITTEE HELD ON TUESDAY, 10TH DECEMBER, 2019, 20.20 - 20.50

PRESENT: Jason Beazley (Advisory Committee Member – Chair), Jane Hutchinson (Advisory Committee Member, Elizabeth Richardson (Advisory Committee Member), David Frith (Advisory Committee Member), Jim Jenks (Advisory Committee Member), Councillor Lucia das Neves, Councillor Justin Hinchcliffe and Councillor Yvonne Say

**The meeting initially began as an informal meeting as it was inquorate; however, upon Cllr Das Neves' attendance, the meeting became quorate.*

At the start of the meeting the Chair noted his concerns around the quorum of the meeting due to a misunderstanding of the substitution process for Councillors. Chair requested that the Chief Whips of each political party be reminded to inform their members on the apologies and substitution process (**Action: Clerk**). **Post meeting note: The Clerk has sent an email to the Chief Whips of each political party reminding them to inform their members on the apologies and substitution process.**

65. FILMING AT MEETINGS

Noted.

66. APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllr James Chiriyankandath, Cllr Scott Emery, Cllr Khaled Moyeed, and Cllr Josh Dixon.

Apologies for lateness were received from Cllr Lucia das Neves.

67. DECLARATIONS OF INTEREST

None.

68. URGENT BUSINESS

There was one item of urgent business – North East Office Building – urgent works report, which was not included when the agenda was published. This report would be considered under agenda item 7.

69. MINUTES

The following points were noted in discussion regarding the previous minutes of the Statutory Advisory Committee:

- A Member suggested that in future under the item of 'Dates of Future Meetings' to include the times for the meetings

- A Member queried the long gap until the next SAC meeting which would be in the end of April 2020. The Clerk clarified that the meeting dates had been set by the Council before the start of the municipal year, and there were a total of four meetings for this municipal year which were in June 2019, October 2019, December 2019 and April 2020. The CEO informed the Members that in future the sequencing of Board and SAC/CC meetings would be examined. **Post meeting note: the next meeting date is 28th April as listed on the agenda. This will give a total of four meetings this year, which is usual. Dates are set by the Council, following discussion with Alexandra Palace.**

At 20:35 Cllr Das Neves arrived at the meeting, and the meeting became quorate. The meeting became formal.

Additionally, the Chair had requested for the production of the SAC minutes on the Alexandra Palace and Park Board agenda as the SAC minutes had not been produced in the last two Board agendas. The Chair had also asked for the Board minutes to be provided to SAC members at the earliest opportunity. **Post meeting: The Board clerk has been notified of the SAC members' requests.**

RESOLVED

To approve the minutes of the Advisory Committee held on 3rd October 2019.

70. CEO'S REPORT

Regarding this item, the SAC endorsed the comments made at the Joint Meeting of the Alexandra Park and Palace Statutory Advisory Committee and the Alexandra Palace and Park Consultative Committee.

Additionally, in discussion the following comments were made:

- Regarding the parking consultation which ends on 31st December, the CEO informed the SAC that the timings and outcome of the consultation would be dependent on the consultation feedback but a substantial amount of work would be required to compile a report. It was noted that before the Board makes any decision, the SAC would be consulted. The SAC were informed that a special meeting would be called should the proposals be developed earlier than anticipated; however, it was more likely that an update would be provided to the SAC at the meeting in April.
- Regarding concerns raised around fireworks and fire damage to the park, the CEO informed the SAC that the scorched marks on the field from the bonfire had been there every year, and the field recovered at a different rate each year depending on the weather conditions; however, the small area of the field had already been reseeded.

71. ANY OTHER URGENT BUSINESS

Regarding this item, the SAC endorsed the comments made at the Joint Meeting of the Alexandra Park and Palace Statutory Advisory Committee and the Alexandra Palace and Park Consultative Committee.

72. DATES OF FUTURE MEETINGS

Noted the date of the future meeting:

Tuesday 28th April 2020 19:30

CHAIR:

Signed by Chair

Date

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MINUTES OF MEETING JOINT MEETING OF THE ALEXANDRA PARK & PALACE STATUTORY ADVISORY COMMITTEE AND THE ALEXANDRA PALACE AND PARK CONSULTATIVE COMMITTEE HELD ON TUESDAY, 10TH DECEMBER, 2019, 7.30 - 8.20PM

PRESENT: Jason Beazley (Advisory Committee Member), Jane Hutchinson (Advisory Committee Member, Elizabeth Richardson (Advisory Committee Member), David Frith (Advisory Committee Member), Jim Jenks (Advisory Committee Member - Chair), Gordon Hutchinson (Consultative Committee Member), Dermot Barnes (Consultative Committee Member), Jacob O'Callaghan (Consultative Committee Member), Nigel Willmott (Consultative Committee Member), Rachael Macdonald (Consultative Committee Member), Val Paley (Consultative Committee Member), Richard Hudson (Consultative Committee Member), Councillor Justin Hinchcliffe, Councillor Yvonne Say, Councillor Dana Carlin, Councillor Nick da Costa, Councillor Eldridge Culverwell, Councillor Bob Hare and Councillor Anne Stennett

155. ELECTION OF CHAIR FOR THE MEETING

Jim Jenks agreed to chair the meeting.

156. FILMING AT MEETINGS

Noted.

157. APOLOGIES FOR ABSENCE

Apologies for absence were received from John Wilkinson, Hugh Macpherson, John Thompson, Duncan Neill, Cllr James Chiriyankandath, Cllr Scott Emery, Cllr Khaled Moyeed and Cllr Josh Dixon.

Apologies for lateness were received from Cllr Lucia das Neves.

158. DECLARATIONS OF INTEREST

None.

159. URGENT BUSINESS

There was one item of urgent business – North East Office Building – urgent works report, which was not included when the agenda was published. This report would be considered under agenda item 10.

160. MINUTES

The following points were noted in discussion:

- Members raised concerns that the minutes of the previous Alexandra Palace and Park Board meeting were not published on the agenda, and suggested that the Board minutes should be finalised in a timely manner to ensure the SAC/CC members had view of the Board minutes prior to the SAC/CC meeting. The SAC/CC Members asked for the Board minutes to be provided to SAC/CC Members at the earliest opportunity. **Post meeting: The Board clerk has been notified of the SAC/CC Members' concerns and requests.**
- A Member raised a concern that the minutes of the Joint SAC/CC meeting and SAC meeting had not been produced in the recent Alexandra Palace and Park Board agendas. Accordingly, the SAC/CC had requested for the Board to take account the minutes of the Joint SAC/CC and SAC meetings, and to ensure that the Board's consideration of the SAC/CC and SAC minutes were published. **Post meeting: The Board clerk has been notified of the SAC/CC Members' concerns and requests.**
- A Member queried whether the absence of SAC/CC and SAC meeting minutes at the Board meeting may be due to the sequencing of meetings. The Chair suggested that the sequencing of meetings should be a matter for the Board to consider.

RESOLVED

1. To approve the minutes of the informal Joint Statutory Advisory and Consultative Committee held on 3rd October 2019.
2. To note the minutes of the Statutory Advisory Committee held on 3rd October 2019.
3. To note the minutes of the Consultative Committee held on 3rd October 2019.

161. CEO'S UPDATE REPORT

The Chair invited Member comments in relation to the CEO'S report as set out. The following was noted:

Park update

- Regarding the new pond in the Grove, the CEO informed this was still in development, being completed by volunteers who visited the site on a weekly basis.
- Regarding the Tree Planting Project, the CEO informed the trees composition would be confirmed in the minutes, with more information provided by the Tree Park Manager (**Action: CEO/Park Manager**).
- Regarding the budget for street lighting, the CEO explained that some of the street lighting had been budgeted for, but costs varied year on year. In years where additional funding was required, it would depend on other works needed to be funded from the budget.

Theatre

- The CEO noted that profit from filming in the Theatre or East Wing was a matter reserved for the trading subsidiary. However, the profit margin was

dependent on the type of filming with some types being more lucrative than others.

- Regarding the list of events, the Trust Secretary noted these were circulated to SAC & CC Members in a monthly 'What's On' email.
- Discussing the Forward Programme for the theatre, the CEO informed that what was able to be released in the public domain appears on the what's on list and the website.

Creative Learning

- Regarding the graffiti on the Grove Pedestrian Bridge, the CEO confirmed she would inform the Creative Learning team to put up notices to help prevent against any further graffiti (**Action: CEO**).
- In answer to a question about provision for people with Autism, the CEO stated that the team were assessing what more can be done for a range of needs.

West Yard Storage Building

- Members indicated that having been consulted on the number of planning matters and a new planning application at West Yard Storage Building, they were satisfied with those plans and had raised no comments.
- The CEO confirmed that no decision had been taken with regards to whether the West Yard Tower building was to be hired for any specific purpose.

Events and Noise Management

- The CEO acknowledged that as standard lessons learnt from the 2019 fireworks event and a review of the event was to be carried out.
- Regarding the fencing put up for the fireworks event, the CEO explained that all fencing erected was considered necessary for the purposes of safety and to prevent access to the event. The CEO acknowledged that the signage could be improved and would inform the relevant team to address (**Action: CEO**).
- The CEO assured Members that Trust staff were always present at any event held at the Palace and Park and oversaw external companies, such as the ones responsible for delivering the fireworks.
- Regarding noise complaints, the CEO informed that those included in the report were those received by the Palace, which were roughly in line with the number received in the previous year. A yearly comparison of noise complaints received would be misleading as the number and type of events held at the Palace and Park varied year on year.
- The CEO informed the Board that if the Trust was able to identify which contractors caused damage to drains at the Palace and Park then it would charge them for the cost of repairs. However, in circumstances where the Trust was unable to identify those responsible, damage is listed in the maintenance log and repairs covered by the relevant event budget. Ticket sales include a restoration levy, a proportion of which is allocated to park maintenance.

RESOLVED

To note the contents of this report.

162. NON-VOTING BOARD MEMBERS FEEDBACK

The non-voting Member commented on recent discussions, which included looking at the possible effects of Brexit on the Trust in the future.

In addition, the following information was noted:

- The CEO informed the annual reports had yet to be sent to the Charity Commission. They had been prepared and were due to be forwarded onto the Commission prior to the December deadline.
- The CEO would ensure an update on the Park Boundary Survey would be provided to the Committee at a future meeting (**Action: CEO**).

163. ITEMS RAISED BY INTERESTED GROUPS

None.

164. NEW ITEMS OF URGENT BUSINESS - NORTH EAST OFFICE BUILDING

A tabled report was circulated to Members, discussing urgent works at the North East Office Building. The Chair invited Member comments. The following was noted:

- The CEO informed that the Trust has applied for part funding and would need to match fund the remaining costs of the project.
- The CEO informed that the heritage approach would be one of conservation in line with the heritage significance statement (still in draft).
- Some of the funding of the cost of conservation architect was provided by Historic England.

RESOLVED

To note the report and provide any advice to the Trustee Board.

165. DATES OF FUTURE MEETINGS

Tuesday 28th April 2020 19:30

CHAIR:

Signed by Chair

Date



ALEXANDRA PARK AND PALACE CHARITABLE TRUST BOARD

23 MARCH 2020

Report Title: Finance, Resource, Risk and Audit Committee (FRRAC) Chair's report

Report of: Sarah Williams, Chair of FRRAC

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

1. Introduction

- 1.1 FRRAC is a non-decision making committee established by the Trust Board to support the Board in delivering its finance, resource, risk and audit responsibilities.
- 1.2 The minutes of FRRAC meetings are circulated to the Trustee Board Members in their information pack.
- 1.3 This report highlights relevant considerations of the FRRAC at its meeting on 25th February 2020 and makes recommendations to the Board.
- 1.4 The meeting was attended by: Sarah Williams, Anne Stennett, Dana Carlin, Bob Hare, Claire Pape, Louise Stewart, Emma Dagnes, Dorota Dominiczak and Nat Layton (clerk) There were no apologies.

2. Recommendations

- 2.1 **That the Five-Year Strategic Plan be approved by the Trustee Board** (Agenda Item 17);
- 2.2 **That the Trustee Board approve the recommendations in the Exempt Pay Report** (Agenda item 16);
- 2.3 **That the Trustee Board adopt the following policies, updated as part of the annual review of policies:**
 - i. **Code of Conduct**
 - ii. **Conflicts of Interest**
 - iii. **Complaints**
 - iv. **Whistleblowing**
 - v. **Safeguarding**
 - vi. **Health & Safety Policy Statement**
 - vii. **Serious Incident Reporting**

3. Trust Financial Results

- 3.1 To enable essential oversight of the Charity's main source of funding, the financial report presented included a group financial view and enabled us to discuss the Trading Company's performance. We requested that cashflow projections be included going forward.

3.2 The Charity's limited unrestricted cash balance remains a concern for FRRAC and increased costs for two main contracts contribute to this. The increases enable contractors to pay their staff at London Living Wage levels.

3.3 FRRAC resolved to note the financial pressures on the Trust and the mitigating actions.

4. 2020/21 Draft Group Budget

4.1 We considered the draft group budget and discussed the measures being taken to ensure the Trustee Board is presented with a balanced budget for 2020/21 and challenged the Executive Team on whether the proposed measures were merely deferring the budget pressures. We were reminded of the strategic vision projects to generate income towards future financial sustainability.

4.2 We noted that formal confirmation of the Corporate Trustee funding cut was expected, further to the Council meeting on 24 February, and the difficulties faced by the Charity due to the uncertainty of the level of Corporate Trustee funding each year.

5. Five-Year Strategic Plan

5.1 We noted that the priority projects identified in the Five Year Plan may not be completed within the five-years but would start the Trust's journey towards financial sustainability. FRRAC understands that the 5-Year strategic plan is a live document and as such can react to the ever changing landscape, in order that our charitable objectives continue to be met.

5.2 We were assured that many of the supporting plans were already in place and others would support stewardship, proactive planning and information sharing.

5.3 FRRAC endorsed the Five-Year Strategic Plan for Trustee Board approval.

6. 2020 Pay Review

6.1 We commended the detailed report and felt the cost of implementing the recommendations was justified.

7. Other items

7.1 FRRAC noted the following items, copies of which are included in the Trustees' Information Pack along with the draft minutes of the meeting: the updated risk register and covering report; an update on the Governance Improvement Programme; Q3 health and safety report and performance indicators.

8. Appendices - None



ALEXANDRA PARK AND PALACE CHARITABLE TRUST BOARD

23 MARCH 2020

Report Title: Financial Results with annual forecast

Report of: Dorota Dominiczak, Director of Finance and Resources

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

Purpose: This paper sets out the financial position of Alexandra Park and Palace Charitable Trust to 31st December 2019 including the annual forecast of incoming and outgoing resources.

1. Recommendation

To note the financial performance of the Trust and the pressure going forward.

2. Executive Summary of 2019/20 Forecast

- 2.1 Table 1 gives an overview of the 2019/20 performance against budget, which shows the Trust is tracking with variances in income and expenditure but overall is on target to achieve the annual budget for the current year. There are no concerns to report with regard to the unrestricted funds and the unrestricted cash flow in 2019-20.
- 2.2 Whilst there is some overspend forecast in some Trust activities the over-spending in those budget lines is fully funded from the Gift Aid transferred to the Trust in year by its trading subsidiary.
- 2.3 The Trust has been fundraising to raise money for the strategic projects, capital repairs and improvements, and to support the Creative Learning Programme. The annual fundraising target has been set at £400,000 and, despite very tough competition in the sector it has been exceeded (Section 4)
- 2.5 The 2020/21 budget is looking very challenging due to the increase in contracts, unavoidable costs and a reduction in regular funding for the Trust.
- 2.6 FRRAC considered a more detailed report on the Group financial results at its meeting on 25th February and feedback is included in the FRRAC Chair's report (Agenda Item 8).

3. Table 1– Summary of Performance 2019-20 – Trust Unrestricted

APPCT At Month Ending 31st December 2019	2018/19 Audited £	Year 2019/20 Budget £	Year 2019/20 Forecast £	Year 2019/20 Diff £
Income				
Unrestricted – (ref Section 4)	3,648,273	3,680,790	3,800,901	120,111
Total Income	3,648,273	3,680,790	3,800,901	120,111
Expenditure – (ref Section 6)				
Running and maintaining the Park	(591,618)	(644,275)	(639,060)	5,215
Running and maintaining the Palace	(1,734,124)	(1,806,577)	(1,903,893)	(97,316)
Creative Learning	(27,992)	(32,110)	(40,672)	(8,562)
Strategic Projects and Programmes	(221,315)	(143,376)	(148,833)	(5,457)
Raising funds	(99,763)	(140,877)	(132,095)	8,782
Strategic Leadership	(317,164)	(341,146)	(341,691)	(545)
Support Costs	(196,028)	(242,472)	(231,961)	10,511
Total Expenditure	(3,188,004)	(3,350,833)	(3,438,206)	(87,373)
Net Movement in unrestricted funds	460,269	329,957	362,695	32,738

3.1 Table 2 – Trust: Unrestricted Income

	2018/19 Audited	Year 2019/20		Diff
	Unrestricted	Budget	Forecast	
Incoming Resources	£	£	£	£
Corporate Trustee Grant - Operational	1,950,000	1,950,000	1,950,000	-
Palace APTL Licence	300,000	300,000	300,000	-
Palace Leases & Recharges	96,828	73,000	89,001	16,001
Park Leases & Recharges	219,425	186,790	244,240	57,450
Creative Learning	12,021	6,000	23,007	17,007
Gift Aid from Trading	1,070,000	1,165,000	1,194,654	29,654
	3,648,274	3,680,790	3,800,901	120,111

3.2 The Corporate Trustee has maintained the annual revenue grant of £1,950,000 for the past five years. The grant, which supports the Trust in delivering its charitable purposes, is being cut by 10% from April 2020 and, as most of the Trust's costs are contractual, this will put pressure on next year's budget.

3.3 Park and Palace Leases and Recharges represent annual lease income from tenancies and recharged facilities costs as well as accidental repairs, if the Trust is entitled to recharge these costs under the terms of the lease. The Park leases report an uplift of £57,000 due to unbudgeted turnover related fees. .

3.4 Creative Learning income represents fees received from Creative Learning events as well as fees charged to schools for workshops and educational activities, to cover the costs of delivery. A positive projected variance of £17,000 is due to successful summer camp activities part funded by the NLHF activity programme (part of the East Wing Programme funding) and part by the Trust, which was offset by a participation fee as income to unrestricted funds.

3.5 The 2018-19 Gift aid was budgeted at £1,165,000 but it has been subsequently revised to £1,194,653 to fund unexpected expenditure in the Trust.

4. Trust Fundraising

4.1 The fundraising target for 2019-20 is £400,000. Table 3 below summarises income received, pledged and applied for to reach this target, which has been exceeded.

4.2 Table 3 – 2019-20 Fundraising income tracker

Funder	Project	Received	Pledge	Total	Purpose
		£	£	£	
Donations	Restoration	6138	-	6138	East Wing Restoration Project
Donations	General Restricted	853	-	853	For future unfunded projects
Hewlett Packard	Creativity Pavilion	25000	-	25000	To fit out new space with IT equipment
Matchroom Foundation	Wild in the Park	50000	100000	150000	Outdoor learning programme for young people
John Thaw	Rock Against Racism	2000	-	2000	Summer camp - music workshops for young people
Teale Charitable Trust	Midsummer Night's Dream	2000	-	2000	Young people's workshops based on the production
Mayor's Greener City Fund	Tree Planting	-	15540	15540	To facilitate Tree Planting
Historic England	North East Office Building	-	250000	250000	Capital refurbishment project
Arts Council England	Biblio Buzz	13463	1132	14595	Children's Book Awards - workshops in libraries
London Community Foundation	Youth Programme	9578	-	9578	Founding Creative Industry Network for Young People
Tottenham Grammar School Foundation	Biblio Buzz	6000	-	6000	Children's Book Awards
Tottenham Grammar School Foundation	Big Schools programme	-	10000	10000	Big Schools Creative Industries events with schoolchildren/young people with special needs
Totals		115032	376672	491,704	

The total amount of funding currently being actively applied for (bids submitted or about to be submitted) is £80,214.

5. Trust's Unrestricted Expenditure

5.1 Running and maintenance of the Park includes the Grounds Maintenance contract and maintenance and repairs of properties in the Park leased to tenants as well as other accidental repairs in the Park grounds. No material variance reported.

5.2 Palace running costs include the in-house maintenance team, third party contracts for maintenance of specialist areas for example the lifts, shutters, ice rink plant; it also covers the building insurance and rates. The overspending of £97,000 was due to a number of necessary accidental repairs of the roof and floor in the Ice Rink.

- 5.3 Creative Learning costs represent a proportion of salaries paid to the staff delivering these activities; the majority of costs are funded by the NLHF Activity Plan grant. The budgeted costs of £32,000 have been exceeded by £8,500 to generate £17,000 of additional return from the summer camp activities.
- 5.4 Strategic Projects and Programmes spending represents the costs of supporting the East Wing Project not funded from the NLHF budget, a feasibility study of car park charging and the costs of the Strategic Vision projects;
- 5.5 Strategic Leadership costs represents the costs of non-departmental members of the leadership team and support costs; costs in relation to taking forward the governance improvement and governance change programmes and non-departmentally attributable costs of implementing the Strategic Vision. No variance on budget is forecast.
- 5.6 Support costs represent the costs of running the office including: IT support, office administration and supplies. A small underspending is due to a freeze on some administrative costs.

6. Capital Expenditure funded by Corporate Trustee grant

- 6.1 Repair and maintenance Capital Projects are funded mainly from the Haringey Council's capital grant - the money is being spent on critical maintenance projects and projects relating to health and safety of the visitors on site. The Trust retains a level of flexibility in the programming of these works to provide for unforeseen urgent works during the year.

6.2 Table 4 – current capital projects

Works Scheduled	Budgeted	In Procurement on 17 Jan 2020
LBH Monies & Grants		
West Hall Ducts	14,725	-
Window Boxes	750	-
South / West Elevations	20,000	20,000
Space Frames Two Bays	25,000	25,000
Basement works	34,192	3,391
Glazing Works (Sector 5)	112,774	-
West Yard Lift	138,433	-
West Yard Shutters	74,100	-
Theatre Stage - Propping Works North	8,350	-
Theatre Stage - Propping Works South	5,000	2,926
Carpet	37,741	-
Fees relating to Capital	13,636	800
Equipment hire (installations)	13,107	-
Materials	392	-
Sector 1 - Palm Court Works	34,100	34,100
Sector 3 - Star Suites , Level 5	9,777	8,640
Sector 6 - Great Hall Works	24,291	24,291
Sector 7 - Ice Rink Works	51,362	4,000
Sector 8 - Theatre	4,400	4,400
Sector 9 - East Lightwell / BBC Doors	11,800	11,800
Sector 10 - BBC Tower	9,300	9,300
Sector 11 - SEOB & East Lightwell	29,000	29,000
South Terrace	7,000	4,860
Account Charges	8	-
	679,238	182,508

7. Capital Expenditure funded by the Trading subsidiary

7.1 The Trust also manages the Restoration Levy collected by APTL on a sale of tickets to events. The funds from this source of income are estimated at c£400,000 pa. The projects provide an enhancement to the visitors' experience in the Park and Palace.

7.2 Table 5 – Projects funded from the Restoration Levy and Gift Aid

Works Scheduled	Budgeted	In Procurement on 17 Jan 2020
Funded from Restoration and GA (Trading Company)		
Park Signage	19,000	-
Park Related	10,000	754
Theatre Bar Cooling	4,923	-
Furniture	20,000	20,000
Exchequer Server	3,279	-
Carpet	4,954	-
Great Hall Lift Works	149,110	-
Equipment hire (installations)	6,878	-
	218,144	20,754

8. Table 7 - Loan commitments

APPCT 2017-18 Budget	capital amount o/s at 1.4.2019	annual interest	annual repayment	remaining term of Loan	instalment payment due date
West Yard Loan	2,421,000	82,000	122,000	32 years	Paid August 2019
Ice Rink main loan	1,231,000	45,000	164,000	7 years	Paid March 2019
Lighting loan (SIF)	145,000	-	44,417	3 years	Paid March 2019
	3,797,000	127,000	330,417		

All Trust loan commitments are up to date.

8.1 Future loan commitments

8.1.1 West Yard construction works are almost complete and the Trust is now in possession of the building.

10. Risks and financial considerations going forward

10.1 The unrestricted funds have no cash reserves as annually all incoming resources are allocated and spent on delivering our charitable objectives. The work on the draft Trust budget has been completed. The 2020-21 unrestricted budget is negatively impacted by the following pressures:

- The Corporate Trustee's grant cut by £195,000 (10% cut).
- Contract costs have increased by £170,000pa from April 2020 to enable the contractors to increase hourly rates to LLW

- 10.2 The proposed reduction in the grant and the already known increases in the security contract and the park maintenance contract costs have put pressure on the trading subsidiary to deliver a higher level of gift aid to cover the shortfall. In 2019-20 the Trust required £1,195,000 Gift Aid and this will have to increase to c£1.55m to balance the Trust's resources in 2020-21.
- 10.3 The Car Parking project is underway. The initial outlay on refurbishment of the existing car parks and the infrastructure has been estimated by the experts together with a potential return for the whole site, but will have to be further examined and tested. However, any financial benefits will not be received before April 2021.

11. Legal Implications

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

12. Financial Implications

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

13. Use of Appendices

None



ALEXANDRA PARK AND PALACE CHARITABLE TRUST BOARD

23 MARCH 2020

Report Title: The Future of the Friends of Alexandra Palace Theatre

Report of: Louise Stewart, CEO

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

Purpose: To agree the desired future relationship of the Trust with the Friends of Alexandra Palace Theatre (FoAPT) to ensure that the best interests of the Charity, including the Theatre, are achieved.

1. INTRODUCTION

- 1.1 The Friends of Alexandra Palace Theatre (FoAPT) was established in 2002 by the Alexandra Park and Palace Charitable Trust. The Trust delegated powers to the FoAPT to raise funds and promote awareness of the theatre.
- 1.2 FoAPT are a valued special interest group who have worked to keep the Theatre restoration project alive for many years, to its successful conclusion and the opening of the Theatre for public use in 2018.
- 1.3 The Theatre is now in full operation and a review of the relationship with the FOAPT is necessary for both the Charity and FoAPT itself.

2. RECOMMENDATIONS

- 2.1 That the Trustee Board agree that they wish FoAPT continue as a special interest group undertaking activities such as those identified in paragraph 3.7 and on the same basis as other special interest groups associated with the Park and Palace.
- 2.2 To agree to request that, if FoAPT themselves wish to continue as a special interest group, that they revise their constitution to that effect, so that the transition can happen smoothly and with limited bureaucracy.
- 2.3 To agree to support FoAPT in making the changes if FoAPT requests support to do so.

3. BACKGROUND AND CONTEXT

- 3.1 FoAPT was set up in 2002 to generate public support to bring the Theatre back into use, to generate funds and to advise on the uses of the Theatre.
- 3.2 The work of FoAPT kept the idea of the Theatre's re-use alive and through maintaining a membership to support the idea, holding events and its membership of the Alexandra Park and Palace Consultative Committee.
- 3.3 FoAPT had input into the shaping of the project and later the Theatre Policy. As a community group it gave support in the bidding process two for what was then Heritage Lottery funding, as well as associated planning applications. It kept its membership informed of progress and updated on construction, and with the Trust organised tours, for its members to view the progress.
- 3.4 The Trust has changed considerably since 2002. It has dedicated communication, fundraising and creative learning teams and the Theatre is now open and in full operation. Future restoration and conservation work that may be required in the space are detailed specialist restoration and conservation tasks which requires expert conservation input. It is generally accepted that the Friends have successfully achieved what they were charged with doing.
- 3.5 The context in which the Trust operates has also changed considerably; and continues to do so, particularly in relation to the regulatory environment on fundraising and the responsibility of Charity's to manage fundraising by third parties on their behalf.
- 3.6 FoAPT recognises that the opening of the Theatre necessitates a review of their future role and the Trust recognises that as the founder of the group it needs to decide and communicate what it may wish of the group in the future.
- 3.7 FoAPT has identified the following as suitable future activities
 - Talks on the history of the theatre to local community and history groups.
 - Our own series of talks on aspects of the history, by our own members or external experts.
 - Continuing participation in regular events such as the AP Garden Centre events, Local History Fair etc.
 - Promoting Drama at the Palace as widely as possible.
 - Continuing research, particularly into the stage and how it was used, and changes to the structure of the theatre over its history.
 - Participating in theatre tours, where possible.
 - Communications such as continuation of the newsletter and social media presence.
 - Arranging group ticket purchase and visits to some theatre performances.
 - Continuing to participate in the committees of the APPCT.
 - Supporting funding applications where community support is needed.

4 Discussions to date

4.1 Informal meetings have been held, between the FoAPT Committee and the Trust Chair and CEO, to listen to the group's thoughts and discuss options for the way forward and included,

- Continuation of a fully functioning group but with revised aims
- Winding up
- Splitting functions between the Trust and a revised Friend's group

4.2 The Board held a workshop in December 2019 to discuss;

- whether there are activities or functions that it would like the group to continue or undertake in the future on its behalf and if so;
- to provide feedback on the Friends' proposed constitution, mission, purpose and activities.

4.3 The Board recognised the work and dedication of the group over many years but concluded that it needed more time to consider the activities that it wished FoAPT to deliver on the Trust's behalf in the future.

4.4 A second workshop was held in February 2020 and the options for the Trust's relationship with FoAPT discussed in more detail. The Board felt that it was important to prefix the discussion about the future of FoAPT to state that FoAPT is a valued part of the AP family of special interest groups that support AP in delivering its charitable purposes. The Trustees have an enormous sense of gratitude for the hard work and support it has provided over the years towards the reopening of the theatre.

4.5 Prior to the workshop FoAPT submitted written representation to the Board suggesting that the existing relationship be maintained and providing a list of potential future activities.

4.6 The outcome of the workshop was that the CEO was asked to prepare recommendations, based on an options and risk assessment, to the Board at its next meeting for consideration.

5. OPTIONS ASSESSMENT

5.1 An options assessment has been undertaken. The options selected for assessment were;

- i. Remove the existing Board delegation to FoAPT
- ii. Retain and adapt the existing delegation
- iii. Remove the delegation and encourage FoAPT to wind itself up

5.2 The options were assessed against the following criteria

- Consistency with the actions identified in the Governance Improvement Programme
- Clarity of roles and responsibilities between parties for the benefit of all stakeholders
- Creation of a positive environment for a membership/advocacy type scheme in the future

- Does not impose constraints on the trading subsidiary
- Overall in the best interests of the Charity

5.3 The options analysis is attached at Appendix 1. The final column highlights in green text where the assessment is positive against the criteria and red where it is not.

5.4 Of the three options one is assessed as having a high level of positive outcomes against the criteria; option i) Remove existing delegation from the Board to FoAPT.

6. RISK ASSESSMENT

6.1 The preferred option i) has been assessed against potential risks and recommendations made to manage those risks, attached at Appendix 2.

6.2 Only one risk, of those identified with this option, cannot be mitigated by implementing the option, on its own. However, the risk is actually a wider fundraising policy issue and will require our policy to be reviewed in due course, to provide clarity on our position when an organisation is fundraising for its own needs when their name is, or is closely associated with the Park and Palace, or any part of it.

7. Conclusion

7.1 The conclusion of the options analysis and the preferred option risk assessment is

7.1.1 that it is in the best interests of the charity for the special interest group to continue if it wishes to do so, but that the constitution should be amended to recognise the next phase of the groups work and enable the charity to achieve consistency in its relationships with its special interest stakeholder groups.

7.1.2 that the Activities proposed by FoAPT in its note to the Board ahead of its workshop in February 2020 are consistent with this approach and do not require the Board to delegate any special duties to the group.

7.1.3 that changing the relationship to one that is 'independent' of the Trust strengthens the group's ability to hold the charity to account on its future care and management of the theatre, whilst facilitating the maintenance of a close relationship through appropriate regular communication.

7.1.4 that the opening of the theatre largely achieved the purpose of FoAPT and created a need to review its future and its constitution. The recommendation enables a continuation of a valued special interest group whilst also enabling the Trustees to take another step forward in improving the Charity's governance towards full compliance with the Charity Governance Code.

7.2 The FoAPT Constitution may not need great revisions and could still contain the original wording but add the details of the changed relationship for example 'formed originally by (insert original wording) and in 2020 with the full consent and support of the trustees and in recognition that the original purposes of the group had been achieved altered its constitution to reflect its revised activities.

So the constitution retains the history of the special relationship and its alteration and the basis of that change in the same place, if this is important to the Friends.

7. Legal Implications

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

8. Financial Implications

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

9. APPENDICES

Appendix 1 – Options Analysis

Appendix 2 – Risk Assessment of Option 1

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Options assessment criteria

- Consistent with the actions identified in the Governance Improvement Programme (GIP)
- Provides clarity of roles and responsibilities between parties for the benefit of all stakeholders
- Leaves a positive environment for the creation of a membership/advocacy type scheme in the future
- Does not impose constraints on the trading subsidiary
- In the best interests of the charity

Option	Considerations	Consequent Future of FoAPT	Assessment
<p>1) Remove existing delegation from the Board to FoAPT</p>	<ul style="list-style-type: none"> • The previously delegated duties have been undertaken and largely completed • No duties have been identified by the Board to delegate • The Trust has increased capability in this area and programmes of activity compared to when the duties were delegated • Clarity of roles and responsibilities but leaves open to the Trust the option of creating an appropriate membership scheme in the future • Retains potential for FoAPT continuation of membership of CC • Does not impact operation of trading activities • Consistent with GIP places FoAPT on same basis as other special interest groups • Provides for an open formal and informal relationship with a special interest stakeholder group • There is value in the continuation of a special interest group participating in the CC to hold the Trustee Board to account on its duties in relation to the theatre 	<ul style="list-style-type: none"> • The group continues as a special interest group • The Trust could offer to give an annual presentation of activities in the theatre and any planned or undertaken work – as per our relationship with Friends of the Park • Updates to SAC/CC about the theatre would continue as per all Trust activities 	<ul style="list-style-type: none"> • Consistent with the actions identified in the Governance Improvement Programme • Provides clarity of roles and responsibilities between parties for the benefit of all stakeholders • Leaves open the possibility of creating a membership/advocacy type scheme in the future • Does not impose constraints on the trading subsidiary • Overall in the best interests of the charity


<p>2) Retain and adapt existing delegation</p>	<ul style="list-style-type: none"> • The previously delegated duties have been undertaken and largely completed • No duties have been identified by the Board to delegate • The Trust has increased capability in this area and programmes of activity compared to when the duties were delegated • Inconsistent with identified actions in GIP • Failure to appropriately update the Governance of the Trust – key duty of Trustees • Lack of clarity over what the role of FoAPT would be ‘officially’ • Does not set out clear roles and responsibilities <p>But;</p> <ul style="list-style-type: none"> • Retains status quo • There is value in the continuation of a special interest group participating in the CC to hold the Trustee Board to account on its duties in relation to the theatre 	<ul style="list-style-type: none"> • Welcome the groups continuation as a special interest group • We could offer to give an annual presentation of activities in the theatre and any planned or undertaken work • Updates to SAC/CC would continue as per all Trust activities 	<ul style="list-style-type: none"> • Not consistent with the actions identified in the Governance Improvement Programme • Does not provide clarity of roles and responsibilities between parties for the benefit of all stakeholders • Leaves open the possibility of creating a membership/advocacy type scheme in the future • Does not impose constraints on the trading subsidiary • Overall not in the best interests of the charity
<p>3) Remove delegation and encourage FoAPT to wind itself up</p>	<ul style="list-style-type: none"> • The previously delegated duties have been undertaken and largely completed • No duties have been identified by the Board to delegate • There is value in the continuation of a special interest group participating in the CC to hold the Trustee Board to account on its duties in relation to the theatre <p>However;</p> <ul style="list-style-type: none"> • The Board does not have the power to wind up FoAPT 	<ul style="list-style-type: none"> • FoAPT ceases to exist or potentially exists with a fractured relationship with the Trust • The Board must avoid providing an opinion that FoAPT should cease to exist. 	<ul style="list-style-type: none"> • Consistent with the actions identified in the Governance Improvement Programme • Provides clarity of roles and responsibilities between parties for the benefit of all stakeholders • Does not leave open the possibility of creating a membership/advocacy type scheme in the future • Does not impose constraints on the trading subsidiary • Overall not in the best interests of the charity

FOAPT Item 10, Appendix 2

Assessment of option i) against previously identified risks

Risk area	Description	Trust requirements	Option i)
Reputation	The Theatre is a significant success story for the Palace and this must continue to be a key message.	Any decision on the Friends should be; <ul style="list-style-type: none"> - sensitively managed - recognise the role of the Friends in achieving that success - take the opportunity to promote the activity that will continue as a legacy of their work/or their role going forward 	<p>There is a clear rationale based on good governance and consistency of how we relate to our stakeholder groups</p> <p>The nature of the board discussion being public means that the Friends 'business' will be in the public domain for two weeks before the board discussion. The Board should write to the Friends to advise them of the coming discussion and the options it has looked at.</p>
People	Some of the key individuals who have led or been instrumental in the Friends work for many years have made it known that they are likely to be stepping down in the near future	The Trustee Board should be careful to ensure that their discussion is based on the needs of the Trust and not around the skills or commitment of any specific individuals, whilst obviously acknowledging the contribution, officially or unofficially of the individuals involved; and ensure a smooth and respectful transition to any new arrangement.	<p>The options assessment has been based solely on the needs and requirements of the Trust, now and in the future, but does appropriately include an element of reputation management.</p> <p>The Trust could offer to provide support to the group to adapt the purpose and mission of the Friends and its constitution, to facilitate a smooth transition.</p>
Legal	<p>Having made the original delegation of power the Trustee Board has a duty to clarify it for the future and to officially recognise that it has been achieved.</p> <p>However, according to the Friends constitution the Trustee Board does not have the power to decide if the group itself should continue. This is a decision for the membership of the Friends themselves. according to their constitution.</p>	The Trustee Board should take care to avoid directing whether the group should continue to exist, it should focus its attention on the role it may wish it to perform in the future.	<p>This option clearly delivers the Trustee duties to ensure the governance of the charity remains fit for purpose.</p> <p>Whilst it provides for a future relationship with the Trust on a par with other special interest groups it makes no comment on whether the group should cease to exist</p>

Governance	The governance review of the Trust identified the Friends of the Theatre as an anomaly, as it is the only <i>Friends of group</i> to have a delegated power from the Trustees and to have a Trustee Board member sit on its management committee.	The Trustee Board should consider whether this provides an opportunity, as recommended by the Governance Review to change this relationship, to put the Friends on the same relationship basis as other stakeholder groups, especially those who are members of the Consultative Committee.	This option delivers on this recommendation of the governance review
Regulation	<p>The changes to fundraising regulation require the relationship between charities and third party fundraisers to be closely and carefully managed</p> <p>The Trust is still required to ensure fundraising regulations are met when it knows about fundraising efforts that may be associated with it; and ensure proper arrangements are in place for money to be transferred to the charity quickly and efficiently.</p> <p>The regulations also require the Trust to ensure that third parties fundraising to raise their own profile or to attract customers by associating themselves with the Trusts' brand are also managed and monitored. So that potential donors are not misled about the purpose of the fundraising and the use of the funds.</p>	<p>The Trust should consider</p> <ul style="list-style-type: none"> - whether it wishes to give a formal fundraising role to a third, unregulated party, now that it has a Fundraising department of its own. - consider the role of friends' groups in the future fundraising approach. <p>The Trust should also consider whether it is desirable for any future group to fundraise for its own needs when the name is associated with the Palace and a Palace facility.</p>	<p>This option places no responsibility on the group in relation to fundraising. If the group continues to exist and wishes to raise funds for the charity, it will have to comply with appropriate regulations and any policies and procedures of the Trust in relation to third party fundraising – on a par with other groups or individuals.</p> <p>This option does not address this risk specifically but further dialogue with the Friends and other groups using the Trusts names or marks is required.</p>

	Document Reference	APPCT Code of Conduct
	Version Number	V3
	Issue	June 2019
	Business Owner	APPCT Board

Created	June 2017
Approved	APPCT
Reviews	June 2019 February 2020

Significant adjustments made
<ul style="list-style-type: none"> June 2019 – replaced section on Trustee Indemnity Insurance with liabilities section

APPCT Trustee & Independent Member Code of Conduct

1. Introduction

- 1.1 This policy applies to Trustees and Independent Members ('the members') of Alexandra Park and Palace Charitable Trust (APPCT), hereafter known as 'Alexandra Palace'.
- 1.2 The Code of Conduct sets out the standards of behaviour expected of those charged with the governance of Alexandra Palace.
- 1.3 The Code also refers to procedures for declaring and managing conflicts of interest, in particular with regard to personal and financial activities and provides clear guidance on the boundaries of acceptable conduct.

2. Principles and Structure of the Code

The Code of Conduct is in two parts. A preamble, which is based on the seven principles of public life established by the Nolan Committee (<http://www.public-standards.gov.uk>) and the Code itself.

3. Coverage

The Code of Conduct applies to voting and non-voting members of Alexandra Palace boards and committees, who will also complete declarations of interest forms and maintain the Register of Interests.

4. Scrutiny

Members should **sign the declaration at the end of this policy** once they have read the Code of Conduct and completed the Declaration of Interests forms. All signed copies of the code and completed forms will be held by the Charity Secretary.

5. Liabilities

Charity Trustees and, in some cases, the members, are personally liable for the debts and liabilities of their charities, regardless of whether the board has acted inappropriately or not. Alexandra Palace purchases trustee indemnity insurance, to cover loss arising in the event of a claim made against a member, however, the Charities Act 2011 states that such insurance must exclude any liability:

- to pay a criminal fine, or a penalty for non-compliance with a regulatory requirement;
- for defending criminal proceedings in which the trustee is convicted of an offence arising out of any fraud or dishonesty, or wilful or reckless misconduct; or
- any liability that arises out of any conduct which the trustee knew (or must reasonably be assumed to have known) was not in the interests of the charity, or did not care whether or not it was in the best interests of the charity.

1. SELFLESSNESS

Alexandra Palace members have a general duty to act in the best interest of the Charity as a whole. They should not do so in order to gain financial or other material benefits for themselves, their family, their friends or any organisation of which they are a member with which they are associated.

2. INTEGRITY

Members:

- Should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their role;
- As well as avoiding actual impropriety, should avoid any appearance of improper behaviour;
- Should avoid accepting gifts and hospitality that might reasonably be thought to influence their judgement.

3. OBJECTIVITY

Members must operate under a high duty of care and should exercise at least the same degree of care in dealing with the administration of Alexandra Palace as a prudent business person would exercise in managing their own affairs or those of someone for who they were responsible.

In carrying out their role, including making appointments, awarding contracts, recommending individuals for rewards and benefits or transacting any other business, board members should ensure that decisions are made solely on merit.

4. ACCOUNTABILITY

Members have a duty to comply with the requirements of charity and company law in accounting for the use and application of Alexandra Palace's assets and should meet the statutory requirements in accounting for those assets.

Members should submit themselves to whatever levels of scrutiny are required to maintain member and public confidence in the management and administration of Alexandra Palace.

5. OPENNESS

Members must strike a balance between a commitment to be open and accountable for the decisions they make and the requirement to handle confidential material with discretion. They should restrict information only when the wider interest of the charity demands it.

Members must ensure that they understand the status of the information that they receive and should ensure that confidential material, including information about individuals and material which could affect the business success of Alexandra Palace is handled with due care. In all other matters board members should be as open as possible about their decisions and decision making procedures.

6. HONESTY

Members have a duty to declare any interests relating to their role and to take steps to resolve any conflicts that may arise. Where private interests of a member conflict with their member duties, the conflict must be resolved in favour of the member role. A private interest in this context includes memberships or other relationships with other charities and non-profit making organisations, as well as directorships of, employment by or shareholdings of more than 1% of the issued share capital of a private business.

7. LEADERSHIP

Members should: promote and support the principles enshrined in the Code of Conduct through leadership and example; respect the role of the CEO and management. There will be circumstances under which members will be working directly with staff and must take care not to use their role to influence staff other than in the implementation of agreed policy. Any discourtesy or harassment of staff could lead to a vote of no confidence resulting in removal from the Board.

Code	Guidance Note
<p>Mission As a guardian of the Charity and steward of the assets I will support Alexandra Palace’s mission (the Charitable Purposes) and values</p>	<p>To support and guard the mission the member will actively participate in the following governance activities:</p> <ul style="list-style-type: none"> • Direction: providing leadership, setting strategy and being clear about what the organisation is aiming to achieve and how it is going to do it. • Effectiveness: making good use of financial and other resources to achieve the desired outcomes. • Supervision: establishing and overseeing controls and risk management, and monitoring performance to make sure that the Charity is on track to achieve its goals, making adjustments where necessary and learning from mistakes. • Accountability: reporting to those who have an interest in what the organisation is doing and how it is doing it.
<p>I will demonstrate appropriate Boardroom Behaviours</p>	<p>Members are expected to: understand the role of the board and prepare effectively for meetings; use their skills, knowledge, experience and own judgement, question assumptions/ established views and encourage diversity.</p>
<p>Conflicts of Interest and Loyalty I will always strive to act in the best interests of Alexandra Palace and I will declare and register my private interests in accordance with Alexandra Palace’s Conflicts of Interest policy and procedures.</p> <p>I will declare my interests in a political party in the Member Register of Interests.</p>	<p>Members must register and declare their private interests in the Register of Interests. Not all interests registered will necessarily lead to a conflict of interest or the exclusion a member from participating in decision making. A member should raise concerns they have about deciding if a potential conflict of interest exists with the Chair and the Charity. The Charity Secretary will produce an annual report on conflicts of interest showing any relevant contracts or grants awarded or decisions made, affecting board member interests and the occasions when members have declared conflicts of interest at Board meetings.</p> <p>Complaints about a member’s failure to register or declare an interest or to manage a conflict of interest properly will be referred to the Charity Secretary for consideration and/or resolution and may be reported to the Charity Commission.</p> <p>While the recruitment process should have identified and resolved any potential political conflicts before a board member is appointed to the board, it is best practice for members to record any details of political office, statement of political support or donations exceeding £5,000 in the Register of Interests.</p>
<p>Persons to Person I will always seek to act in accordance with Alexandra Palace values and policies in my relationships with fellow members, staff, volunteers, supporters, partners and beneficiaries, or anyone I come into contact within my role.</p>	<p>The Alexandra Palace expects its members to own and uphold its values and ethos in their relationships with all Stakeholders.</p>
<p>Protecting APPCT’s reputation I will not speak as a member of Alexandra Palace to the media or in any other public forum without first informing Alexandra Palace.</p> <p>When I am speaking as an Alexandra Palace board member within or outside the organisation, my comments will reflect current policies and organisational views even when these do not agree with my personal opinion.</p>	<p>If you are approached by the media for a statement or are invited to speak at a public meeting on an issue relating to the Charity, please notify the Chair and contact the CEO who will provide advice on whether to accept the invitation and will arrange a briefing should one be required.</p> <p>Dissenting views can and indeed should be aired in discussions at Board meetings. However, when speaking for Alexandra Palace outside of the confines of the Board meetings, members must represent the official position of the Board. Every effort should be made by board members, and by those preparing them to speak to the public, to represent these views accurately and consistently. In cases where an issue has not yet been decided or, if necessary, come to vote or a decision reached, members should consult the Chair.</p>
<p>Political Affiliation I will not use my board member role for either personal political advantage or to gain advantage for any political party of which I am a member.</p>	<p>Members should not use their position in Alexandra Palace to advance their political career or seek political or electoral advantage through their association with Alexandra Palace. For example, their member role in Alexandra Palace may be referenced in election material but not exploited in such a way as to imply endorsement by Alexandra Palace of their candidature. They should not seek to impose their personal or political views or their political party’s views or policies on Alexandra Palace.</p>
<p>Personal Gain</p>	<p>I will document expenses and seek reimbursement according to Alexandra Palace’s Member Expenses Policy. Aggregate member expenses are</p>

<p>I will not personally gain materially or financially from my role as a member, nor will I permit others to do so as a result of my actions or lack of action.</p> <p><i>Alexandra Palace's Member Expenses Policy is available from the Charity Secretary.</i></p>	<p>reviewed by Alexandra Palace's external auditors and declared in the Annual Report and Accounts.</p> <p>Members should not accept gifts or hospitality that might reasonably be thought to be an attempt to influence their judgement as a member. In case of doubt please contact the Charity Secretary.</p> <p>Members must declare at each Board meeting any remuneration they (or a person connected with APPCT) have received from Alexandra Palace.</p>
<p>At Board Meetings</p> <p>I will strive to attend all Board meetings, giving apologies ahead of time to the Chair and Company Secretary if unable to attend.</p> <p>I will engage in debate and voting in meetings according to procedure, maintaining a respectful attitude toward the opinion of others while making my voice heard.</p> <p>I will maintain confidentiality about the business conducted in Board meetings unless authorised by the Chair or the Board to speak of it.</p>	<p>Members are required to attend at least 50% of Board meetings. If a member is absent from more than three consecutive meetings, the Board may call upon that member to step-down from the committee.</p> <p>The Board is made up of a group of individuals with different views. However, all members should have in common a commitment to Alexandra Palace and the Board's governance process. To engage in this process, members must express their views clearly when it is their turn to speak, and then listen to others in turn. They must not attempt to silence minority opinions nor, for instance, talk over others, use their mobile phones or other technology inappropriately in meetings or leave the room unnecessarily when others are speaking.</p> <p>Following debate by the Board, if it is not possible to obtain consensus on an issue then the Chair may call for a vote. BMembers vote according to procedure. In case of a tied vote, the Chair has a casting vote. A majority is sufficient for an issue to be resolved save for some constitutional matters. Members have the right to have their opposition to a decision made part of the record, but they are duty bound to uphold all decisions of the Board as policy.</p> <p>At times the Board will deal with sensitive issues and confidential information, board members must maintain confidentiality about Board business unless authorised to speak of it by the Chair or by a decision of the Board.</p>
<p>Enhancing Governance</p> <p>I will participate in induction training and development activities for board members and support stakeholder engagement activities where a board member presence is required.</p>	<p>An induction programme is provided for newly-elected members. Other training and development courses are provided as required/ requested and members may request additional meetings with staff on specific issues. All such meetings should be arranged through the Charity Secretary unless the member is invited by the staff member to contact them in which case the Charity Secretary should be informed.</p> <p>Alexandra Palace is aware of its accountability to all stakeholders and has in place a number of mechanisms for engaging with stakeholders. Members are expected to support these initiatives wherever possible.</p>

TRUSTEEE/ INDEPENDENT MEMBER CODE OF CONDUCT DECLARATION FORM


I declare that:

- I am over 18
- I have read and will comply with Alexandra Palace 's Code of Conduct for Members
- I will declare and register my private interests in accordance with the Code of Conduct

Name: _____

Signed: _____

Date: _____

	Document Reference	APPCT Conflicts of Interest Policy
	Version Number	V3
	Issue	February 2019
	Business Owner	APPCT Board

Created	April 2016
Approved	14.02.2019
Reviews	Feb 2017 Oct 2019

Significant adjustments made
<ul style="list-style-type: none"> Oct 2019 Minor amendments to reflect Charity Commission Guidance

APPCT Conflicts of Interest Policy

1. Introduction

- 1.1 This policy applies to Trustee Board members, Company Directors (APTL Board Members) and Independent Members of Alexandra Park and Palace Charitable Trust (APPCT) and its trading subsidiary APTL, hereafter known as 'Alexandra Palace'. On appointment members are required to read this policy and complete the attached Conflict of Interests declaration.
- 1.2 This policy has been drawn up and is enforced by the Trustee Board. This policy is subject to annual review by the Trustee Board.
- 1.3 Members have a duty to act in the best interests of the Charity (the Charity's charitable purposes and the public benefit) and the Charity Commission expects trustees to avoid putting themselves in a position where their duty to their charity conflicts with their personal interests or loyalty to any other person or body.
- 1.4 Members must identify and manage conflicts of interest and any perceived conflicts of interest. This ensures public trust and confidence that charity trustees are taking decisions only in the best interests of their charities and are not influenced by their other interests.

2. What is a conflict of interest?

- 2.1 For the purpose of this policy, the term '**conflict**' includes conflicts of interest and conflicts of duty or loyalty (perceived, potential and actual).
- 2.2 Definitions
- **A conflict of interest** is a situation where a trustee's or director's personal (or other) interests could be seen to prevent the trustee from making a decision only in the best interests of the Charity.
 - **A conflict of loyalty** is a situation where a trustee's or director's loyalties or duties to another individual or organisation could be seen to prevent the trustee/director from making a decision in the best interests of the Charity.
 - **A perceived conflict** is one which a reasonable person could consider likely to compromise the relevant individual's ability to make a decision only in the best interests of the Charity.

- **A potential conflict** is a situation which could develop into an actual or perceived conflict although no conflict currently exists. For example, your partner works for a firm that provides services which the Charity does not currently use but could use in future.

2.3 Conflicts of interest generally involve financial interests i.e. anything of monetary value including, but not limited to, contracts, consultancy fees, shareholdings, equity interests, debt, property, royalties and intellectual property rights. Conflicts of interest may also arise from a non-financial benefit or advantage, including, but not limited to, enhancement of an individual's career or professional reputation, access to information or facilities that could be used by others, advancing a cause or reputation or improving access to any beneficial connection or other advantage.

2.4 Charity Trustees cannot benefit directly or indirectly from their role as a charity trustee unless explicitly authorised (in the Charity's governing document or by the Charity Commission). A benefit is interpreted widely and includes financial or any other measurable benefit, and includes payment made to the trustee or a connected person. Payment of reasonable expenses of trustees is not a trustee benefit and does not create a conflict of interest.

2.5 Conflicts of duty or conflicts of loyalty are any interests, duty, role or loyalty, relationship or conviction which could directly or indirectly affect that person's ability to make decisions solely in the best interests of the Charity. These include:

- significant relationships, such as a spouse, relative or close friend, may be felt to influence the decisions of the Members of the APPCT Board and APTL Board;
- Other roles, for example, trusteeships, memberships on committees or other bodies
- Employment by another organisation, for example, one with which the Charity contracts, or collaborates or competes;
- Providing advice or support to another body;
- Active membership of a body;
- Strongly-held beliefs. For example, anti-Royalist.

2.6 Connected Persons

A conflict can arise because of a member's relationship with or connection to a third party or organisation (a connected person). These must be dealt with in the same way as personal conflicts.

Examples of connected persons:

- close members of family (spouse/civil partners, parents, grandparents, children, brothers/sisters and their partners)
- a business partner or colleague
- anyone whose finances are interdependent with the Members of Alexandra Palace (e.g. joint bank accounts, joint mortgages or property held in joint names, one party financially dependent on the other, joint beneficiaries of a trust)
- employer/ employee or contractual relationship or anyone receiving a benefit where it could otherwise be perceived that such benefits could lead to a conflict of interest, i.e. by influencing the Member's decisions other than in the best interests of the Charity.

3. Disclosing Conflicts of Interests

3.1 Prior to appointment prospective members should make known any relevant issues that may constitute a conflict of interests.

3.2 Once appointed members are required to complete a declaration of interest form prior to their attendance at meetings and are invited to review their declarations annually or submit a fresh disclosure form (APTL members only).

3.3 Members are expected to make known any significant changes or new interests that arise during the year as soon as practicable after becoming aware of the interest. They should disclose the nature and extent of the interest.

- 3.4 Members should make known, to the whole board, any conflicts in relation to items on the agenda for each meeting. If a member becomes aware of a possible conflict of interest, which the relevant person appears not to have considered, they should raise it. disclose the nature and extent of the interest.
- 3.5 If a member is unsure about whether to make a declaration at a meeting they should contact the charitysecretary@alexandrapalace.com who will, if necessary, seek professional advice. If in doubt it is always better to make a declaration to avoid any reputational risk of the Charity being perceived to not have properly managed conflicts of interests.
- 3.6 Some personal information about third parties can only be held with their agreement. Generally, the limited information needed to declare a conflict will not require such consent. If consent was needed it would be the responsibility of the person providing the information to obtain this consent. Should a third party decline to consent, then it is the responsibility of the Member of Alexandra Palace to nevertheless ensure that a potential conflict is declared. Any declaration where data is held in relation to a third party will be dealt with in a manner consistent with the General Data Protection Regulation.

Board members are required to declare at each Board meeting any remuneration either they (or any person connected with APPCT) have received from Alexandra Palace during the previous financial year.

4. Managing and recording conflicts of interest

- 4.1 The Charity Secretary maintains a register of interests declared by the Trustees of the Charity (whether or not they give rise to any potential conflicts) which is reviewed annually. In the interests of transparency, this register is publicly available, and may be inspected by the Charity Commission. Interests declared by Company Directors and Independent Members are not included on the public register but must be made available for inspection in some circumstances under company law.
- 4.2 All identified conflicts and actions taken by the members to deal with them are recorded (usually in the minutes of relevant meetings). The written record should cover:
 - the nature of the conflict;
 - the trustee or trustees affected;
 - whether the conflict was declared in advance;
 - an outline of the discussion;
 - who if anyone withdrew from the discussion;
 - how the trustees came to their decision to proceed.
- 4.3 Conflicts cannot be avoided and are not seen to affect the integrity of a trustee but they must be managed correctly. Conflicted trustees should declare their interest at an early stage and, in most cases, withdraw from relevant meetings, discussions, decision making or voting procedures.
- 4.4 The APPCT board or APTL board must decide how to manage a conflict. This could include:
 - not pursuing a course of action or pursuing a different course of action
 - proceeding with the issue in a different way so that a conflict of interest does not arise
 - allowing the person declaring the interest to contribute information to the meeting, but that person must not participate in the discussion, or vote on the matter and will not be counted in the quorum for that issue
 - the conflicted member withdrawing from the meeting and not participating in the discussion or voting on the matter. Steps will need to be taken to ensure sensitive information is not available to that member.
 - not appointing a particular trustee or securing a trustee resignation

- where trustees have decided against removal of the conflict of interest they must prevent it from affecting their decision in a different way
- where a Trustee's interest is regularly preventing them from taking part in decision making the interested Trustee may need to consider stepping down from the Board.

4.5 Where a conflict of interest has not been dealt with properly and is subsequently identified, the Charity Commission expects charities to act promptly to put matters right and prevent the same issue from arising again.

5. Failure to address conflicts of interest properly

Members should be mindful of how a situation may appear to someone outside the Charity and ensure the Charity can demonstrate such situations have been dealt with properly. Failure to identify or adequately address conflicts of interest could result in a number of risks:

- Personal liability risks (for example, due to a breach of legal duties or for losses caused to the Charity. The trustees may have to recompense the Charity for sums it has spent or lost.
- Invalidity of a transaction (or that transaction being liable to be set aside if challenged)
- Invalidity of one or more trustees' decisions (e.g. if the trustees acted in breach of the Act)
- Reputational risks for the Charity and potential damage to public trust and confidence in charities in general.

6. Transparency

This policy will be available to all staff, Members of the APPCT Board and Directors of the APTL Board s and to third parties where appropriate.

7. Associated documentation and further information

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

- Code of Conduct
- Member expenses Policy
- Whistle-blowing Policy
- Gifts and Hospitality Policy
- Board Role Descriptions
- Serious Incident Reporting Policy

Charity Commission Guidance:

<https://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29/conflicts-of-interest-a-guide-for-charity-trustees>

8. 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.

9. 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
15.01.2018	V2	Louise Stewart	Formatted in house-style and new declaration form.
26.06.2019	V3	Nat Layton	Revised, simplified

Alexandra Park and Palace Charitable Trust
Member Declaration of Interests Statement

This form should only be completed after having read and understood the Conflict of Interests Policy. Please raise any questions with the APPCT Chair. This form should be returned to the Executive Assistant, APPCT, and will be kept on file

Conflicts of Interest ("Col"): See paras 1 and 2 in Col policy for definitions of Conflicts of Interest and connected persons.

Name	
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<p>1. List companies, businesses, charities or other organisations of which you or a person connected to you are involved, for example as a member, director, consultant or adviser or have another role which is relevant for the purpose of determining whether a conflict may exist.</p> <p>Please provide details of the nature of the connection and state whether each position is remunerated (salary, fees, pensions, honoraria, dividend share option etc)</p>
<p>You:</p>
<p>A connected person:</p>

<p>2. List of companies, charities or organisations in which you or a connected person have directly or indirectly shareholdings or beneficial ownership or other financial interest or expectation of such an interest. Shareholdings of less than 1% of the issued share capital need not be declared. State the nature and extent of the interest.</p>
<p>You:</p>
<p>A connected person:</p>

3. Membership of or roles or activity in professional bodies or associations, campaigning or special interest groups. State the extent and nature of the involvement.

You:

A connected person:

4. Any other potential conflict of which APPCT should be aware e.g. collaborators in academia or industry, involvement with other education-related organisations, political or other pressure groups.

You:

A connected person:

5. Are you or a connected person in receipt of or likely to become in receipt of any benefits, grants, loan or service from the APPCT or any direct or indirect pecuniary benefit from the APPCT other than expenses as a Trustee? If so, provide details.

You:

A connected person:

6. In respect of any interest or potential interest declared are you aware of any circumstances where that interest may result in any transaction, competition or collaboration with the APPCT or where the interest of the APPCT may in any way interact with that interest? If so please provide details

You:

A connected person:

7. Any other situations or relationships that might create conflicts that have not been covered above. For example, ownership of land adjoining APPCT property or intellectual or other property rights in the APPCT's area of operation.

You:

A connected person:

8. Is there any further action required by you to identify other potential conflicts? If yes, please summarise concerns and actions below:

DECLARATION


I have entered the required responses to the best of my knowledge and belief.

Signature:

Date:

Additional Information

Full Name (as per passport):

	Document Reference	Complaints Policy
	Version Number	V4
	Issue	FRRAC & APTL Feb 2018
	Business Owner	APPCT Board

Created	Nov 2017
Approved	20.02.2018
Reviews	June 2019

Significant adjustments made
<ul style="list-style-type: none"> • June 2019 Stage 2 amended to be completed at Director level and Stage 3 at Board level • June 2019 Sections 6&7 reflecting new Visitor Services role in handling

Customer Complaints Policy

1. Introduction

Alexandra Park and Palace Charitable Trust (APPCT) and its trading subsidiary APTL, hereafter known as 'Alexandra Palace', view complaints as an opportunity to explain our actions, to put things right for the person or organisation that has made the complaint, if appropriate, and as an opportunity to learn and improve what we do and how we do it.

2. Scope

This policy covers complaints about Alexandra Palace's provision of services and public benefit. The scope of the policy does not include internal complaints or grievances, or complaints of a whistleblowing nature, which are dealt with under separate policies. Employee complaints should be dealt with under the Grievance or Whistleblowing Policies.

3. Policy

- 3.1 A complaint is any expression of serious dissatisfaction, whether justified or not, about any aspect of Alexandra Palace. For this reason, the complaints policy applies both to the Trust and its Trading Subsidiary.
- 3.2 Alexandra Palace outsource some delivery to contractors, if the complaint is about or involves a contractor this is considered to be a complaint about Alexandra Palace.
- 3.3 Alexandra Palace organises hires of the Park and the Palace to external clients for events and activities. In this instance customers of those events are customers of the external client and complaints will be forwarded to them, as appropriate, for resolution.
- 3.4 We aim to:
 - provide a fair complaints procedure which is clear and easy to use
 - publish the complaints procedure so that people know how to make a complaint
 - respond to all complaints in a timely manner and investigate them appropriately and fairly
 - resolve complaints and repair relationships, wherever possible
 - gather information and take action when necessary to help us to improve
 - to handle all complaints and complaint information sensitively, telling only those who need to know, following principles of relevant data protection legislation
 - ensure everyone at Alexandra Palace knows what to do if a complaint is received.

4. Complaints handling

- 4.1 It is recognised that complaints may arrive through channels publicised for that purpose or through any other contact details or opportunities the complainant may have. Once recognised as a complaint, all complaints will be handled according to this policy and will be treated confidentially.
- 4.2 We will;
- acknowledge complaints within five working days
 - tell the complainant what will happen next and give an indication of timescale
 - make the complainant aware of our complaints policy
- 4.3 For complaints received by telephone or in person, the person receiving the complaint will aim to capture and record the information outlined above. When appropriate, we will ask the complainant to send a written account by post or by email so that the complaint is recorded in the complainant's own words.

5. Making a Complaint

- 5.1 We encourage the swift reporting of dissatisfaction, whilst on site, to the staff at the facility being used or at one of the designated receptions so that we have the opportunity to put things right at the time.
- 5.2 If this is not possible, or you are not satisfied with the response received:
- in writing to 'Feedback' at Alexandra Park & Palace Charitable Trust, Alexandra Palace Way, Wood Green, London N22 7AY
- or by e-mail to Customer.Service@alexandrapalace.com
- or by telephone 020 8365 2121
- 5.3 When you make a complaint it is helpful if you could include the following information,
- Describe clearly what happened, (Include the date, time and location of the incident. Please be as specific as possible about the location within the Palace or the Parkland)
 - Tell us why you are making a complaint
 - Tell us what you would like us to do
 - Please provide your full name, email address and contact phone number
 - Tell us how you would prefer us to contact you
 - If appropriate, please send us any documents that support your complaint.
- 5.4 We cannot guarantee that complaints made via social media will be seen and responded to within the timescales set out in this policy. We do not have the resources to monitor the wide range of social media channels available. We will aim to acknowledge complaints made via these channels but refer the complainant to an alternative method of communication so that the complaints policy can be followed.
- 5.5 If you have asked someone to contact us on your behalf, please make sure they provide evidence of their authority to act on your behalf.
- 5.6 If you wish to make a complaint anonymously please be assured that we will look into it, but our ability to address it fully will be limited. We would encourage you to consider our Whistleblowing Policy as a more appropriate way to make your complaint and protect your identity.
- 5.7 We would encourage a complainant to contact us directly with their complaint. However, a complaint can be made to the Charity Commission at any stage. Information about the kind of

complaints the Commission can involve itself in can be found on their website at:
www.charitycommission.gov.uk/publications/cc47.aspx

- 5.7 Alexandra Palace is registered with The Fundraising Regulator and we abide by standards set out in the Code of Fundraising Practice. Complaints in relation to our fundraising activities will be dealt with in accordance with this complaints policy. However a complaint can be made to the Fundraising Regulator if you are not satisfied with the outcome of our complaints procedure <https://www.fundraisingregulator.org.uk/>

6. Resolving Complaints

- 6.1 Alexandra Palace recognises that some complaints will be made directly to individual staff members or departments for resolution. In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the complaint has been received directly to an individual they will assess if they are able to resolve it swiftly, and should do so if possible and appropriate. This is our opportunity to apologise, explain and rectify if we can.
- 6.2 If the individual cannot resolve the complaint or the issue is regarded to be sensitive or significant, the complaint information should be recorded and passed to the Head of Department as soon as possible.
- 6.3 The person who receives a complaint should capture:
- the facts of the complaint including date and time
 - Take the complainant's name, address and telephone number
 - Note down the relationship of the complainant to Alexandra Palace
 - Tell the complainant that we have a complaints procedure and where to find it
 - Tell the complainant what will happen next and how long it will take
 - Where appropriate, ask the complainant to send a written account by post or by email so that the complaint is recorded in the complainant's own words.
- 6.4 The Head of Department will assess:
- If the complaint can be handled at department level or whether it needs to enter the formal complaints procedure, below
 - If the complaint is a recurring complaint that needs to be escalated to a Director to identify and implement actions to prevent future complaints
 - What further evidence may be available to assess the complaint e.g. CCTV evidence, security logs, event incident logs. In the case of CCTV, will inform security to save the recording for the appropriate timings.
- 6.5 Complaints received via the 'feedback' route will be logged by Visitor Service Assistants (VSA) who are responsible for responding to low level complaints within 72 hours. If the complaint cannot be resolved within 72 hours a response acknowledging this will be sent by the VSA with a deadline for response (within the 4 week period).
- 6.6 If a VSA is unable to handle the enquiry it will be escalated to the Visitor Service Supervisor and serious matters will be referred to the Visitor Service Manager who will liaise with the relevant heads of departments to gather a response. The response to the customer will be sent by the Visitor Service Manager.
- 6.7 The Visitor Service Manager will address:
- If the complaint can be handled at department level or whether it needs to enter the formal complaints procedure, below
 - If the complaint is a recurring complaint that needs to be escalated to a Director to identify and implement actions to prevent future complaints
 - What further evidence may be available to assess the complaint e.g. CCTV evidence, security logs, event incident logs. In the case of CCTV, will inform security to save the recording for the appropriate timings.

- 6.8 Anonymous complaints should be logged as such and treated in as similar way as possible. If at all possible the complainant should be encouraged to consider the Whistleblowing Policy as a way to make their point whilst protecting their identity.
- 6.8 If an individual is concerned he/she can inform the Whistle blowing contact by telephone: 020 8365 4555 or by emailing whistleblowing@alexandrapalace.com please see whistleblowing policy for further details.

7. Formal complaints procedure

7.1.1 Stage One - Process

On receiving the complaint into the formal procedure, internally or via the 'feedback' route, it is recorded in the complaints log by a complaints administrator or by the Head of Department. The complaints administrators are,

- Visitor Service Assistants
- Visitor Service Supervisor
- Visitor service Manager
- CEO Executive Assistant

The CEO will call a Complaint Panel to assess the complaint, the issues it raises and to resolve and respond to the complainant; or determine whether the complaint warrants an 'internal investigation'. If an internal investigation is called for, the CEO will appoint an appropriately independent and senior member of staff to investigate.

The panel will agree the scope, method and timescale for the investigation. The investigation procedure will be tailored to each complaint but follow the principles outlined in appendix 1.

7.1.2 Stage One - Outcomes

The outcome of stage 1 will be a response to the complaint to explain our actions or the situation and whether we agree with their complaint and what we are doing about it; or the outcome of the investigation.

There are three outcomes of an investigation:

- a) complaint upheld - the complaint is justified in full or in part and the organisation needs to take remedial action
- b) complaint not upheld – the organisation acted in accordance with its standard operating policies and procedures and that these are in accordance with legal requirement and industry best practice.
- c) complaint not upheld – as b) but there are lessons for the organisation.

7.1.3 Stage One - Communication

Ideally complainants should receive a definitive reply within four weeks. If this is not possible because, for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is justified or not, the reply to the complainant should describe the action taken to assess or investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

If the complaint relates to a specific member of staff or volunteer, they will be informed and given a fair opportunity to respond. Complaints will be acknowledged within five working days. The acknowledgement should say who is dealing with the complaint and when the person complaining can expect a reply.

A copy of this complaints procedure should be attached.

7.2.1 *Stage Two - Process*

If the complainant feels that the problem has not been satisfactorily resolved at Stage One, they can request that the complaint is reviewed at Director level. At this stage, the complaint will be passed to the CEO of Alexandra Park & Palace.. The CEO may undertake the review themselves or delegate to another Director of Alexandra Palace.

The scope of stage two is to establish if the,

- process was undertaken in accordance with the complaints policy
- process was appropriately thorough
- evidence supported the conclusions reached

This may involve reviewing the paperwork and speaking with the individuals who dealt with the complaint at level one. No new evidence should be submitted at this stage.

7.2.2 *Stage two – Outcomes*

There are three outcomes of a review

- a) The investigation conclusion – was not justified in full or in part and the organisation needs to take remedial action
- b) The investigation conclusion - was justified and the complaint remains 'not upheld'.
- c) The investigation conclusion – was justified but there are lessons for the organisation

7.2.3 *Stage Two Communication*

The request for a Director level review should be acknowledged within five working days of receipt. The acknowledgement should say who will deal with the case and when the complainant can expect a reply.

7.3 *All stages*

If the complaint relates to a specific member of staff or contractor, they should be informed and given a further opportunity to respond. The person who dealt with the original complaint at Stage One should be kept informed of what is happening.

7.4 Ideally complainants should receive a definitive reply within four weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be provided.

7.5 Whether the complaint is upheld or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

7.6.1 *Stage Three - Process*

If the complainant feels that the problem has not been satisfactorily resolved at Stage Two, they can request that the complaint is reviewed at Board level. At this stage, the complaint will be passed to the Chair of the Alexandra Park & Palace Charitable Trustee Board. The Chair may undertake the review themselves or delegate to another board member of Alexandra Palace.

The aim of stage three is to review the process followed at stage two, and may involve reviewing paperwork and speaking with individuals involved at stages one and two.

No new evidence should be submitted at this stage.

7.6.2 *The outcomes of stage three*

There are three outcomes of a review

- a) The stage 2 investigation conclusion is upheld and no further action is required
- d) The stage 2 investigation conclusion – is overturned
- e) The investigation conclusion – was justified but there are lessons for the organisation

7.6.3 *Stage Three Communication*

The request for Board level review should follow the same procedure and timescales as at stage two

The decision taken at this stage is final, unless the Board decides it is appropriate to seek external assistance with resolution.

8. Variation of the Complaints Procedure

The organisation may vary the procedure for good reason. This may be necessary to avoid a conflict of interest, for example, a complaint about a Director should not also have the Director as the person leading a Stage Two review.

In the case of multiple complaints from beneficiaries about the same issue (customers, visitors, users of the Park and Palace) the complaint will be assessed as a single complaint but each individual complainant will be responded to.

9. Recording, Monitoring and Learning from Complaints

Complaints are recorded on entering the official complaints procedure and the recorded information detailed above is allocated a complaint reference number. For further details on information recorded and held see appendix 2.

Complaints are reviewed annually to identify any trends that may indicate a need to take further action.

10. Responsibility

Overall responsibility for this policy and its implementation lies with the Board of Trustees.

11. Appendices

Appendix 1 – Internal Complaints Investigations
Appendix 2 – Complaint Recording

12. Associated documentation and further information

Data Protection and Document Retention Policies
Subject Access Request Policy
Whistleblowing Policy

13. 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.

The organisation will review and ensure compliance with this policy at regular intervals.

Date	Version	Author	Amendments
June 2019	V4	Commercial Director & VSM	Includes the role of the Visitor Service Team in complaint/feedback handling included. Sections 6 & 7 Stage 2 amended to be completed at Director level and Stage 3 at Board level

14. Data protection

Alexandra Palace processes personal data as part of recording and responding to complaints in accordance with its data protection policy. The organisation has in place arrangements to ensure that personal data is held securely and accessed by, and disclosed to, authorised individuals only. Inappropriate access or disclosure of personal data constitutes a data breach and should be reported in accordance with the organisation's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the organisation's disciplinary procedure

15. Equality

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.

APPENDICES

Appendix 1 - Internal Complaints Investigations

An investigation may be necessary because it involves accusations of discrimination, personal injury, inappropriate staff members conduct, the involvement or interest of the media or police involvement.

An investigation may be called if it is assessed that the complaint could escalate if not given this level of treatment at this stage.

The purpose of an internal investigation is to;

- establish facts and evidence and other relevant information about an incident or complaint from the organisation's perspective,
- to identify what remedial action or improvements, if any, need to be made

An investigation will be led by a suitably experienced individual, who is or was not directly involved in the issue being investigated and is not in a position of direct line management of an individual being complained about or providing witness statement.

The investigation lead will agree with the CEO

- the scope of the investigation
- the key questions that need to be answered
- how to collect, document and file information
- how information should be reported
- the timescale for completion

The investigation lead will have authority to call for CCTV evidence, request witness statements and/or the meeting attendance of employees and employees of third party contractors, as appropriate.

Appendix 2 – Complaint recording

Complaint record keeping

A complaint register is held by the organisation. All acknowledged complaints will be recorded on the complaints register. The Executive Assistant to the CEO holds the complaints register which does not store personal data once the issue has been resolved and responded to.

The complaint register records:

- the complaint reference number
- The date the complaint was made
- The name of the complainant, while the complaint is live (anonymised once complaint resolved)
- The nature of the complaint
- The name of the lead investigator/complaint handler
- What action is or has been taken
- The date of action being taken
- The outcome of the complaint
- If the complaint corresponds with an incident logged by the onsite security team (on the 'Incident or Issue log' known as the IOI) the relevant reference number will also be recorded.

Complaint file (Paper and electronic)

A complaint file will be opened for each complaint and will include,

- A copy of the complaint - such as the letter, email, or recorded information from social media or complaint phone call
- All correspondence in relation to the complaint, including written communication within the organisation
- A copy of the investigation report and supporting evidence.

Investigation reports

All internal investigations will produce an investigation report in the agreed organisational format. This report will include;

- The nature, process, and findings of the investigation and its conclusion.
- The witness statements and supporting evidence.
- Any points of learning for the organisation and any action required

Complaint document retention

The complaint register information will be held on a restricted access file for a maximum of five years so that trend data can be established for performance management purposes.

This complaint file will be held on a restricted access file for a maximum of three years or until the complaint is fully resolved. Full resolution includes any subsequent action being taken by the complainant or any third party such as the charity regulator, ombudsman, Health and Safety Executive (HSE) or UK Courts.


After these stated time periods the documentation will be deleted and/or destroyed

Complainant access to stored information

If a complainant requests access to their personal data through a formal Subject Access Request (SAR) under the Data Protection Act (DPA) the information will be provided in accordance with the requirements of the legislation and guidance from the regulator, the Information Commissioners Office (ICO).

However, information will be anonymised and redacted as deemed necessary to protect and safeguard employees, and the employees of third party contractors, of Alexandra Palace.

The Charity and its trading subsidiary are not public bodies and therefore not subject to Freedom of Information (FOI) legislation. If information is requested the Chief Executive will consider each request on its own merit, assessing whether it is in the best interests of the Charity to release any information and the terms on which the information will be provided.

	Document Reference	Whistleblowing Policy
	Version Number	V7
	Issue	July 2017
	Business Owner	APPCT Board

Created	June 2017
Approved	18.07.2017
Reviews	June 2019 February 2020

Significant adjustments made
June 2019 – Independent advice charity details amended and Charity Commission advice details added
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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

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 creating risk to health and safety;
- an act causing damage to the environment e.g. Pollution incident;
- financial irregularities;
- concerns regarding fundraising practice
- act of bribery;
- harassment of a colleague, customer or other individual
- a breach of any other legal obligation; or
- concealment of any of the above.

As a charity we need to be transparent in all that we do ensuring our reputation and maintaining public confidence in everything we do. This means that the definition of public interest is broad.

It is not necessary for the individual to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The individual has no responsibility for investigating the matter; Alexandra Palace has responsibility to ensure that an investigation takes place.

3. Scope

This policy applies to all employees both full-time, part-time and those working on a fixed term or casual contract. It also covers other individuals providing services or performing work, such as agency workers and contractors, and these individuals are also encouraged to use this policy.

This policy covers disclosures about matters other than a breach of an employee's own contract of employment. If, an employee wishes to make a complaint about their employment or how they have been treated, they should use the following policies:

- Anti-Bullying and Harassment Policy
- Diversity and Inclusion
- Disciplinary Policy
- Grievance Policy
- Serious Incident Reporting

4. Policy

It is our policy that any fraud, misconduct or wrongdoing is reported and properly dealt with. Alexandra Palace therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run. This policy also sets out the procedure in which individuals may raise any concerns that they have 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;
- 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 a disciplinary offence;
- If misconduct is discovered as a result of any investigation under this procedure the Alexandra Palace disciplinary procedure will be used, in addition to any appropriate external measures;
- Maliciously making a false allegation is a disciplinary offence;
- 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, individuals should not agree to remain silent. They should report the matter to the HR Department.

5. Procedure

Alexandra Palace encourages individuals to raise their concerns under this procedure in the first instance. If an individual is not sure whether or not to raise a concern, he/she should discuss the issue with his/her line manager or the HR department.

Stage 1 Raising concerns

In the first instance, any concerns should be raised with the individual's line manager unless the individual reasonably believes his/her line manager to be involved in the wrongdoing, or if for any other reason the individual does not wish to approach his/her line manager. If he/she believes the line manager to be involved, or for any reason does not wish to approach the line manager, then the individual should proceed straight to stage 3.

Stage 2 How Alexandra Palace will handle the matter

When advised of a concern or on receipt of a complaint Alexandra Palace will assess the information and consider what action might be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. Alexandra Palace will advise the individual 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 the individual summarising the concern and setting out the proposal for handling the concern. Please note, however, that it may not always be possible to inform the individual 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 the individual is concerned that his/her line manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the Board, he/she should inform a Whistle blowing contact by telephone: **020 8365 4555** or by emailing whistleblowing@alexandrapalace.com or by directly contacting the Head of HR or 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 as in stage 2 above. If for any other reason the individual does not wish to approach his/her line manager, he/she should also in the first instance contact Head of HR. Any approach to the director will be treated with the strictest confidence and the individual's identity will not be disclosed without his/her prior consent.

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. The Charity Commission advises seeking advice from Protect (see section 10) initially to ensure the individual is sure about whether it is within the law to share evidence with the Charity Commission.

<https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

6. Reporting the matter to the proper authority

If on conclusion of stages 1, 2 and 3 the individual reasonably believes that the appropriate action has not been taken, he/she should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- the Financial Conduct Authority (formerly the Financial Services Authority);
- Fundraising Regulator
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Police Complaints Commission; and
- the Serious Fraud Office.

7. Action to be taken by the manager

Any manager who is informed by an individual of potential wrongdoing will take immediate action to investigate the situation. In doing so, the manager will take every possible step to maintain the anonymity of the individual who has made the allegation of wrongdoing.

The individual who has raised the issue will be kept informed of any investigation that is taking place. The individual will also be informed of the outcome of the investigation. It might not always be appropriate to tell the individual the detail of any action that is taken, but the individual will be informed if action is taken.

8. Alerting outside bodies to a potential wrongdoing

An individual should always, in the first instance, talk to a manager in the organisation about a potential wrongdoing. If the individual is not satisfied with the response, he/ she is entitled to contact a relevant external body to express their concerns. In doing this the individual should:

- have a reasonable belief that the allegation is based on correct facts
- make the disclosure to a relevant body
- have a reasonable belief it is in the public interest to make the disclosure.

A "relevant body" is likely to be a regulatory body (e.g. the Health and Safety Executive, or the Financial Conduct Authority).

9. Contacting the media

In the first instance Alexandra Palace would want to investigate any Whistle blowing concerns. Individuals should not contact the media with allegations about the organisation, except in extraordinary circumstances where neither the organisation nor the relevant regulatory body would be appropriate.

10. Independent Advice

If an individual is unsure as to whether to use this policy or wants confidential advice about raising a concern about malpractice at work, they may contact the independent charity **Protect** on 0800 055 7214 www.pcaw.co.uk or by email at whistle@protect-advice.org.uk.

11. 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.

12. Associated documentation and further information

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

- Grievance Policy
- Bullying and Harassment Policy
- Code of Conduct
- Serious Incident 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>


13. 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.

14. 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
03.10.2017	V2	Catherine Solomon	Includes reference to fundraising code and fundraising practice
02.08.18	V3	Catherine Solomon	Data Protection section 13 added
18.09.18	V4	Catherine Solomon	Direct phone number & email address added
11.03.19	V5	Catherine Solomon	Contact details amended for independent advice for Protect (<i>formerly Public Concern at Work</i>)
25.06.19	V6	Nat Layton	Stage 3 Charity Commission guidance link added

	Document Reference	Safeguarding Policy
	Version Number	V5
	Issue	November 2018
	Business Owner	APPCT Board

Created	July 2018
Approved	06.11.2018
Reviews	Oct 2018

Significant adjustments made
<ul style="list-style-type: none"> Oct 2018 Policy updated in light of legislative changes. Section 22 on Data Protection and updated in light of Charity Commission Guidance

SAFEGUARDING POLICY

1. Introduction

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, vulnerable adults, 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 vulnerable adults 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.

Alexandra Palace recognises that all organisations providing activities for children and vulnerable adults 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 vulnerable adults who visit and take part in activities in the Park and Palace.

Where safeguarding concerns are raised, we will take swift action to ensure that concerns are acknowledged, correctly managed and reported.

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 Policy
- Whistleblowing policy.

This policy aims to ensure that children and vulnerable adults, and all those who work with them, are safe and supported within Alexandra Palace and its organised activities.

2. Policy Statement

Alexandra Palace acknowledges a duty of care to safeguard and promote the welfare of children and vulnerable adults and is committed to ensuring that its safeguarding practice reflects statutory responsibilities, relevant and complies with best practice.

It aims to ensure that regardless of age, gender, religion or belief, ethnicity, disability, sexual orientation, marital status or socioeconomic background, all children and vulnerable adults:

- have a positive and enjoyable experience at Alexandra Palace in a safe environment; and
- are protected from abuse.

Alexandra Palace acknowledges that some children and vulnerable adults, including disabled people, those with special educational needs or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

It is our policy that we will

- promote and prioritise the safety and wellbeing of children and vulnerable adults;
- 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 vulnerable adults;
- 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.

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

Alexandra Palace has a responsibility to share relevant information about the protection of children and vulnerable adults. If a child or vulnerable adult 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 vulnerable adult 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 vulnerable adult 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

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

'Designated Safeguarding Lead' means the Head of HR.

'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).

'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 as well as volunteers.

'Child' - a 'Child' is anyone who has not yet reached their 18th birthday

'Vulnerable adult' 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.

Vulnerable adults could include:

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

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

'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.

'Child Abuse' - Child Abuse is any action by another person – adult or child – that causes significant 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 <http://www.londoncp.co.uk/>

Abuse of vulnerable adults 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.

See Appendix I for detailed definitions.

5. Legal expectations and requirements:

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 (updated 22 October 2019)
- Guidance – how to report a serious incident in your charity (updated 14 June 2019)

Alexandra Palace does not at present deliver registerable services under the Care Standards 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 vulnerable adults. Some of these fall within the definitions of Regulated Activities within the meaning of the DBS and the Department for Education (DFE) definitions of Regulated Activity.

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 2018. We recognise documented definitions of types of child abuse and provide a senior manager (Head of HR), 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.

In relation to vulnerable adults, we recognise Care and Support Statutory Guidance (Updated in July 2018), the Safeguarding Vulnerable Groups Act 2006

Above all Alexandra Palace recognises that the prevention of child abuse and the protection of vulnerable adults 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

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

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 Vulnerable Adults are:
- 6.3 Creative Learning Programme: onsite and offsite workshops, events, tours, handling collections and presentations, master classes and work experience placements
- 6.4 Ice rink: Skating coaches and judges are required to apply to NISA annually for a 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 vulnerable adult should be managed. A similar protocol exists as to how the venue will act when a child or vulnerable adult is found to be separated from their carer.
- 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 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.
- 6.9 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 and contractors, when working in partnership within the Park (a public space, open 24/7) and Palace, to safeguard and promote the welfare of children and vulnerable adults 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 vulnerable adults 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 vulnerable adults.

8. Safeguarding roles and responsibilities

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.

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.

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, Local Safeguarding Children Board and Local Safeguarding Adult Board, the police, the DBS and/or the Charity Commission).

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.

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.

The Board will appoint a safeguarding trustee on the Board.

The Head of Human Resources 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.

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.

All staff have a responsibility to report any concerns to their manager or Designated Safeguarding Lead.

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

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 vulnerable adults are prevented from doing so.

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 vulnerable groups.

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.

Alexandra Palace will implement appropriate recruitment procedures for members of staff working on activities with children and/or vulnerable adults, having substantial access to children and/or vulnerable adults, 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 vulnerable adults.
- 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 vulnerable adults, 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 vulnerable adults 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 vulnerable adults will receive training on safeguarding training.
- 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

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 vulnerable adults (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.

10. Procedure for Managing a disclosure

Disclosing abuse is difficult for variety of reasons. Some children and vulnerable adults 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.

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.

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

This procedure below will be followed whenever a disclosure has been made, or there is a suspicion that a child or vulnerable adult 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.

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.

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.

Where risk of harm or abuse is identified, we will take action to best protect the child or vulnerable adult.

Alexandra Palace will involve the child or vulnerable adult 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 vulnerable adult.

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. The Designated Safeguarding Lead will consult with the relevant agencies in such cases.

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.

Following an investigation, disciplinary action may be taken as appropriate.

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.

12. Responding to Concerns

Deal with any immediate needs:

- Take all reasonable steps to ensure the child or vulnerable adult 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.

Listen carefully if a child or vulnerable adult 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 vulnerable adult;
- Do not discuss in any circumstances the allegation of abuse with the alleged perpetrator.

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.

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.

Inform:

- Your line manager as soon as possible and within 24 hours
- In the absence of your line manager, a senior manager, Designated Safeguarding Lead or Lead Site Security team member, or emergency services in an emergency. During an event, Venue I will act as designated safeguarding lead and should be notified of any disclosures received so that the appropriate response can be initiated by Event Control. The event protocol should be followed and employees should seek advice if unsure.

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.

13. Responsibilities of the line manager

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.

It is the duty of the line manager to:

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.

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

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

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.

If line managers have:

1. Concern that a child or vulnerable adult 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.
2. Concern that a child or vulnerable adult is being abused by an Alexandra Palace member of staff.
3. A disclosure from a child or vulnerable adult that they are being abused by somebody not connected to Alexandra Palace.
4. An allegation that somebody working at Alexandra Palace has abused a child or vulnerable adult.

they should inform their manager or Designated Safeguarding Lead.

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.

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

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.

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.

Alexandra Palace is aware that we have a responsibility both to the children / vulnerable adults 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.

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.

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.

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.

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.

14. Whistleblowing

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.

15. Children Attending events / tours

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 protocol.

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)

16. Procedure for lost children attending a performance, event or tour.

In the event that a child is found having been separated from the adult carer, the member of Alexandra Palace staff should contact AP Control via radio or extension 2222 who will implement Alexandra Palace's Found Child protocol. At all times, where practicable, we undertake that any lost child 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.

The matter should be recorded and reported using the Control Daily Occurrence Book.

17. 'Abandoned' Children

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.

NB: This procedure should only be used if the adult is not in the building, not if a parent and child have become separated.

No member of staff should accept responsibility for a child under any circumstances.

Unaccompanied Minors 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.

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.

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.

During daytime opening hours, security on duty should be alert for any unaccompanied minors entering the building.

18. Work Experience

Alexandra Palace considers applications for Work Experience on a case by case basis subject to the needs of the business.

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.

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.

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.

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.

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.

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.

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.

19. Sexual relationships

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.

20. Alcohol

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.

21. 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

22. Data Protection

When an individual makes a disclosure or reports a concern, 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.

23. 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

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.

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".

Suspicions 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.

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 Bichard, 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 vulnerable adults 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 vulnerable 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 vulnerable adults
- 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 Feb 2018) 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 (September 2018);
Care and Support Statutory Guidance (Updated July 2018)

Charity Commission Guidance: Safeguarding and protecting people for charities and trustees (updated 25 October 2018)

How to report a serious incident in your charity (updated 17 October 2018)

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 vulnerable adult that is intended to be oppressive, threatening, manipulative or in any way improper or with a view to causing the child or vulnerable adult 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 vulnerable adult 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 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 vulnerable adult has been abused, is being abused or is at risk of being abused, in any way arising as a result of that child'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 vulnerable adult, 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 vulnerable adults equally, with respect and dignity;
- Always putting the welfare of children and vulnerable adults 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 vulnerable adults;
- 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 vulnerable adults away from others;
- Avoid association (outside the work environment) with children and vulnerable adults 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 vulnerable adults unchallenged;
- Make sexually suggestive comments to a child or vulnerable adult, even in fun;
- Reduce a child to tears as a form of control;
- Allow allegations made by a child or vulnerable adult to go unchallenged, unrecorded or not acted upon;
- Do things of a personal nature for children or vulnerable adult that they can do by themselves;
- Invite or allow children or vulnerable adult 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 vulnerable adult

**If a child or vulnerable adult is in immediate danger call 999
Take all reasonable steps to remove the child or vulnerable adult 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 / VULNERABLE ADULT’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 was said, what was done and by whom, and any other specific factors or information that you know of eg. 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 / vulnerable adult know that this report has been made?

Yes No

Does the child / vulnerable adult 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:

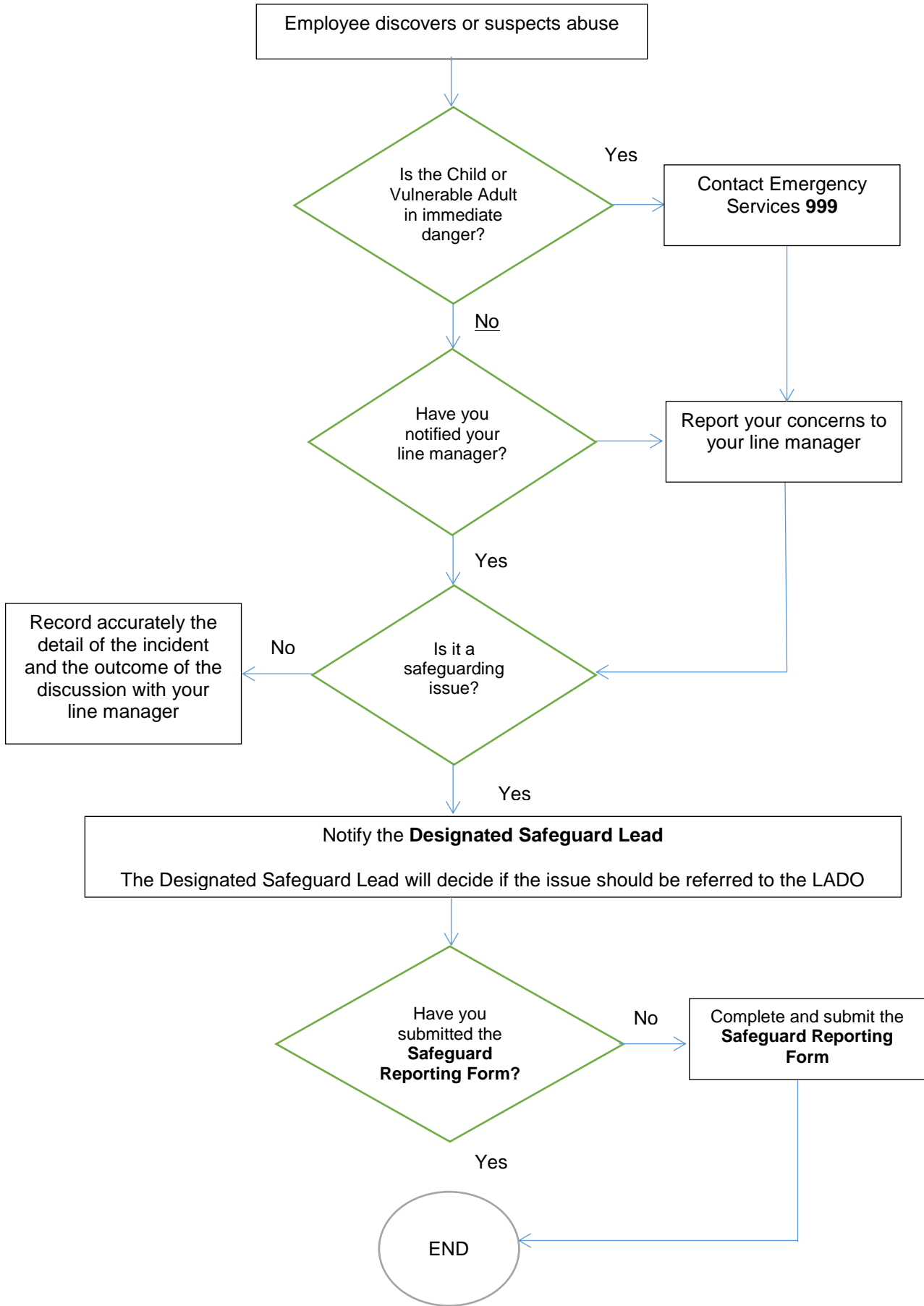
FOR HR USE ONLY


Received by Designated Safeguarding Leader

Signed _____

Date:

APPENDIX 5 Safeguarding Reporting – Flowchart



	Document Reference	H&S Policy
	Version Number	V4
	Issue	March 2019
	Business Owner	APPCT Board

Created	Nov 2016
Approved	04.03.19
Reviews	Dec 2017 Feb 2018 Jan 2019

Significant adjustments made
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Health & Safety Policy Statement

1. Introduction

Alexandra Park and Palace Charitable Trust (APPCT) and its trading subsidiary APTL, hereafter known as 'Alexandra Palace' is committed to managing health, safety, wellbeing and environmental issues effectively.

2. Policy

A joint health and safety policy statement demonstrates a coordinated approach to safety management and an efficient and effective method to achieve compliance with all relevant legislation and demonstrate best practice.

The Directors of Alexandra Palace and the Board of Trustees for APPCT collectively accept personal responsibility for:

- protecting the health, safety and wellbeing of employees
- protecting the health and safety of everyone who can be affected by the Palace, Park, events or leisure facilities
- protecting and enhancing the environment
- fostering a positive health and safety culture across the organisation
- holding safety at the core of all activities and decision making processes.

Managing health, safety, wellbeing and environmental issues appropriately is a key contributor to the continuing success of Alexandra Palace and Park as both an attraction and company. We do this by:

- putting the necessary focus on these issues
- valuing our employees through consulting them on significant decisions
- working together at all levels across Alexandra Palace and with everyone who helps to create and manage events and provide leisure facilities
- assessing and adequately managing all significant risks under our control
- providing appropriate training, information and supervision for employees
- monitoring, auditing and reviewing our health, safety and environmental performance, in order to learn and make sure we continually improve.

The overall responsibility for making sure that health, safety, wellbeing and environment issues are properly managed is with the Chief Executive Officer of Alexandra Palace. For day to day operations this responsibility is delegated through the line management structure, with all managers being responsible for actively managing health, safety, wellbeing and environment within their teams and areas of responsibility, including setting a good example

All employees are responsible for:

- working safely, taking care of themselves, others and for the environment
- co-operating with all health, safety, wellbeing and environmental requirements at Alexandra Palace
- reporting hazards and other health, safety, welfare and environmental problems promptly

Should any employee feel that any work activity or task is being undertaken in a manner likely to expose themselves, colleagues or others to unacceptable or unnecessary risks, then this one individual is empowered to stop the work activity. A suitable manager will then immediately review the concerns raised, with support from the health and safety team as required. Work will recommence when the individual's concerns have been suitably addressed and all involved agree the work activity is safe to continue.

No member of the team working at Alexandra Palace will be negatively impacted or adversely treated for raising a genuine concern about the safety of themselves, work activity or others in the workplace.

We also need our employees and everyone involved in creating and managing events to actively participate in improving health and safety. We can only achieve and maintain a good performance with the co-operation and support of everyone involved.


Version Control:

This policy statement is reviewed annually, upon significant change within the organisation or upon change in appropriate legislation.

Date	Version	Author	Amendments
08/01/2019	3.0	Graeme Timms, Head of H&S	Addition of additional responsibility to hold safety at the core of all activities and decision making and addition of fostering a positive safety culture.
04/12/2017	2.0	Graeme Timms, Head of H&S	Minor – non substantive changes to introduction. Adjustments in Section 2 to explicitly state directors and trustees responsibilities

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.

Signed By	Name	Position	Date
	Anne Stennett	Chair of Board of Trustees, Alexandra Park and Palace Charitable Trust	
	Anne Stennett	Chair of Alexandra Palace Trading Ltd	
	Louise Stewart	Chief Executive Officer, Alexandra Park and Palace Charitable Trust & APTL	

	Document Reference	SIR Policy
	Version Number	V4
	Issue	March 2019
	Business Owner	APPCT Board

Created	March 2019
Approved	March 2019
Review 1	July 2019 Feb 2020

Significant adjustments made
<ul style="list-style-type: none"> July 2019 – Board delegated to Chair to decide whether to report a serious incident in order to meet CC timescales

Serious Incident Reporting Policy

1. Introduction

This policy covers Serious Incident Reporting to the Charity regulator, the Charity Commission, as it relates to Alexandra Park and Palace Charitable Trust (APPCT) and its trading subsidiary APTL, hereafter known as 'Alexandra Palace'. The Policy is also relevant to Alexandra Park and Palace leaseholders, tenants and clients on site.

The policy below provides Alexandra Palace with an effective and easy to follow process, closely in line with Charity Commission guidance.

2. Background

The Charity Commission states that it is vital that charities, whether they work domestically or around the world, report serious incidents to the regulator. The Commission also states that data on serious incident reporting allows it to better understand risks facing the sector and take appropriate action.

However, the Commission recognises the challenging nature of the work undertaken and the difficult context faced by many charities. It understands that serious incidents will happen but it is the Commission's role to ensure that trustees comply with their legal duties and that the charity manages the incident responsibly. The Commission will be looking for assurance that the Charity has taken steps to limit the immediate impact of any serious incidents that may occur and, where possible, prevent it from happening again.

The Commission acknowledges that most problems can be resolved by trustees themselves. However, sometimes it needs to use its powers to protect a charity. Reporting also means the Commission can identify whether other charities might be affected, and can give better advice to all charities to help them protect themselves.

2.1 What is a Serious Incident?

The Charity Commission defines significant as '*significant in the context of your charity, taking account of its staff, operations, finances and/or reputation*'; and defines a serious incident as an adverse event, whether actual or alleged, which results in or risks significant:

- harm to people who come into contact with our Charity through our work and our trading subsidiary
- loss of our Charity's money or assets
- damage to our Charity's property
- harm to our Charity's work or reputation

An act of discrimination against any person with a protected characteristic listed in the Equality Act 2010 will also be treated as a serious incident.

The main categories of reportable incidents set out by the Charity Commission are:

- protecting people and safeguarding incidents – incidents that have resulted in or risk significant harm to beneficiaries and other people who come into contact with the charity through its work
- financial crimes – fraud, theft, cyber-crime and money laundering
- large donations from an unknown or unverifiable source, or suspicious financial activity using the charity's funds
- other significant financial loss
- links to terrorism or extremism, including 'proscribed' (or banned) organisations, individuals subject to an asset freeze, or kidnapping of staff
- other significant incidents, such as – insolvency, forced withdrawal of banking services without an alternative, significant data breaches/losses or incidents involving partners that materially affect the charity

3. Scope

This policy covers all activities of the Charity and its operations, including the activities of APTL, leaseholders, tenants and clients on site, should they create a 'serious incident' for the Charity.

It does not cover or replace the Charity's obligations to report incidents to statutory authorities such as the Police, Health and Safety Executive or Licensing Authority that the organisation may need to do from time to time in the ordinary operation of its business.

However, incidents that are reported to the statutory authorities can become relevant to this policy, i.e. become in scope, for example if the Charity is subjected to an investigation by a statutory authority or if it deems itself to be at fault and there is potential reputational damage to the Charity as a result.

4. Policy

4.1 It is our policy to report all 'serious incidents' to the Charity Commission within 72 hours of the Trustee Board's decision to report a serious incident, providing an appropriate level of information and to respond to any resulting requests for information within 2 weeks.

4.2 What we will report

The nature of the Charity's assets and activities mean that it deals with incidents on a frequent basis as part of its operations. Very few of these incidents are likely to be reportable.

The incidents that we will report and the incidents that it is not necessary to report are detailed in attachment 1. This is based on Charity Commission guidance: (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752170/RSI_guidance_what_to_do_if_something_goes_wrong_Examples_table_deciding_what_to_report.pdf).

This not a definitive list of reportable incidents but indicates the types of incidents categorised as 'serious' and reportable and will act as a guide as to what should and shouldn't be reported.

4.3 **Who is responsible for reporting?**

All Trustees bear ultimate responsibility for ensuring their Charity makes a report, and does so in a timely manner. It is the Trustee Board that decides which incidents to report.

The Board does not have powers to take decisions outside of meetings or by written resolution. The Charity Commission requires serious incidents to be reported within 72 hours and, at such short notice, a special meeting may not be quorate. Therefore, the Board have delegated responsibility for making the decision about whether or not to report a serious incident to the Chair and, in their absence the Vice Chair, in order to meet SIR submission timescale requirements.

The CEO or other relevant Executive Team Member may recommend a particular course of action (i.e. to report the serious incident or not to report) when seeking the Chair/Vice Chair's decision and may seek advice from the Charity's legal advisors on behalf of the Chair/Vice-Chair if the need to report is uncertain.

The CEO, on behalf of the Chair/Vice Chair, will notify Board members of reportable incidents and any decision to report to the Charity Commission.

Any decisions taken by the Chair/Vice Chair in relation to incidents will be formally reported at the subsequent Board meeting. Due to the likely nature of any serious incident it may be considered under exempt items (with reference to the relevant category of information in the Local Government Act, Access to Information Schedule 12). Decisions will be recorded, including reasons if the Chair/Vice Chair decides not to report an incident.

Once the decision has been taken the Corporate Trustee will be given details of the incident before the report is made to the Charity Commission.

4.4 **Actions we will take in response to a serious incident**

If there is a serious incident we will:

- prevent or minimise any further harm, loss or damage
- report it to the Commission as a serious incident
- report it to the Police (and/or other relevant agencies) if we suspect a crime has been committed, and to any other regulators the Charity is accountable to and other agencies such as the Local Authority Designated Officer (LADO) for Safeguarding
- put in a place a communication plan for staff, volunteers, the public, the media and other stakeholders, such as funders
- review what happened and prevent it from happening again – this may include reviewing internal controls and procedures, internal or external investigation and/or seeking appropriate help from professional advisers

4.5 **How we will report**

The Trustee Board delegates responsibility for reporting serious incidents to the CEO who will report serious incidents to RSI@charitycommission.gov.uk.

If the information we provide (or wish to provide) is particularly sensitive or confidential or if we feel a particular exemption applies, we will inform the Charity Commission and explain our reasoning.

To ensure that the relevant and appropriate information is captured at the time and reported consistently we will use the Serious Incident Reporting Form attached to this policy, attachment 2.

The Charity is required as part of its annual return, to sign a declaration confirming there were no serious incidents during the financial year that should have been reported to the Commission. If incidents did occur, but weren't reported at the time, we will submit these before we file our Charity's Annual Return, so that we can make the declaration and meet our legal reporting requirements.

5. Associated documentation and further information:

Related policies: Safeguarding, Health & Safety, Data Protection, Whistleblowing (fraud reporting), Risk Management, Disciplinary/Grievance, Bullying and Harassment, Equal Opportunities.

AP is committed to providing effective supervision, support and training. Staff will receive mandatory training on Equality and Diversity, Data protection, Safeguarding, Health and Safety appropriate to their role.

6. Status of policy

Date	Version	Author	Amendments
22.07.2019	V3	Louise Stewart	4.3 amended further to Board decision on 16.7.19 to delegate to the Chair/Vice Chair on whether a serious incident should be reported to the CC or not.

7. Attachments:

- Attachment 1 – Alexandra Palace guidance regarding reportable and not reportable incidents
- Attachment 2 – Alexandra Palace Serious Incident Reporting Form

Attachment 1 – Examples Table Deciding what to report

Serious incidents to report	Incidents not to report
Protecting people and safeguarding incidents	
<p>A beneficiary or other individual connected with the Charity's activities has/alleges to have suffered serious harm</p> <p>Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under the Charity's care</p> <p>The Chief Executive of the Charity has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff</p> <p>Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer</p> <p>A staff computer is found to contain images of child pornography</p> <p>An internal investigation has established that there is a widespread culture of bullying within the Charity</p> <p>A beneficiary or individual connected with the Charity's or APTL's activities has died or been seriously harmed; a significant contributory factor is the Charity's failure to implement a relevant policy</p> <p>Charity failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position</p> <p>Charity discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register</p>	<p>Minor unusual/aggressive behaviour by a beneficiary towards a member of staff</p> <p>Police called to Charity premises because a beneficiary is drunk and disorderly</p> <p>Charity becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside the Charity; the Charity has reported the allegations to the appropriate agencies, and there is no harm to the Charity's reputation</p> <p><i>Beneficiary in a care home received the wrong medication as a 'one-off' error and there was no significant harm</i></p> <p>Logged accident book reports where there was no significant harm to individuals</p> <p>Details of reports under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where there has been no significant harm to individuals</p> <p>Minor accidental injury to a Charity service user e.g. slipping on a wet floor</p> <p>A staff member who is not in a senior position or position of specific responsibility (e.g. head of safeguarding) has bullied or harassed a fellow staff member. There is no indication of a widespread culture of bullying or harassment within the Charity and the incident is dealt with by minor disciplinary action (for example, the staff member responsible has not been suspended or dismissed).</p>

Serious incidents to report	Incidents not to report
Fraud, cyber-crime and money laundering	
<p>Charity's Chief Executive and Treasurer produced false invoices for charity services</p> <p>A bogus fundraising scheme is being promoted online, using Charity's name</p> <p>Charity funds lost due to an online or telephone 'phishing scam', where trustees were conned into giving out bank account details</p> <p>Attempted fraud by a member of Charity staff but intercepted by internal financial controls</p>	<p>Attempted cyber-crimes that are blocked by the Charity's computer network security systems, except where the attempted cyber-crime is unusual in nature and the Charity wants to bring it to the attention of the Commission</p>
Theft	
<p>Any actual/suspected incidents of theft of cash from cash tills, cash office or donation collection tins which has been reported for criminal investigation</p> <p>Charity office has been broken into and computers, holding personal details of beneficiaries and donors, stolen</p>	<p>One-off random theft of items such as jewellery or a mobile phone at the Charity's premises</p> <p>Theft of small amounts of cash belonging to a beneficiary, by another beneficiary, at a Charity event</p> <p>Theft of a collection tin thought to contain small amount of cash</p>
Unverified or suspicious donations	
<p>A significant amount over £25,000 is donated to the Charity from an unknown or unverifiable source</p>	<p>Large legacy left in a will, received via solicitor dealing with probate, on condition donor remains anonymous</p> <p>Large donation made by an anonymous donor via solicitor who is aware of their identity</p> <p>Low value donations from unknown sources - refer to our guidance on due diligence and monitoring end use of funds</p>
Other significant financial loss	
<p>Significant loss of Charity funds in a poor investment scheme, commissioned by trustees, without professional advice</p> <p>Sudden loss of 20% or more of Charity's income (e.g. due to termination of major donor contract); Charity has no reserves, meaning staff will be laid off and services stopped</p> <p>Substantial loss of Charity funds due to legal costs incurred in a court case; excludes those charities routinely undertaking budgeted litigation on behalf of beneficiaries</p> <p>The Charity's main premises is severely damaged in a fire and the Charity is unable to deliver services to its beneficiaries</p>	<p>Loss of Charity funds where the value lost represents less than £25,000 of Charity assets and is less than 20% of the Charity's income. There is no significant impact on the Charity's services.</p> <p>A vehicle owned by the Charity is badly damaged in an accident. Nobody was hurt, the damage is covered by insurance and the Charity is still able to deliver services to its beneficiaries</p>

Serious incidents to report	Incidents not to report
Links to terrorism or extremism	
<p><i>Charity discovers that an overseas partner has passed money to a member of Charity's personnel who is a designated individual, subject to financial restrictions</i></p> <p>A member of Charity staff or volunteer has been arrested for terrorism related offences</p> <p><i>Charity's warehouse in a war zone has been raided and vehicles/ stock taken at gunpoint</i></p> <p><i>Charity personnel have been detained or kidnapped by a terrorist group overseas</i></p> <p>A visiting speaker has used a Charity event to promote extremist messages, via live speech or social media</p>	
Other significant incidents - Disqualified person acting as a trustee	
<p>Any person acting as a trustee or senior manager while disqualified – refer to the Commission's guidance</p>	<p>A trustee or senior manager voluntarily steps down from trusteeship when disqualified for having an IVA (Individual Voluntary Arrangement)</p>
Charity subject to investigation by a regulatory body	
<p>Charity is subject to official investigation by another regulator e.g. Fundraising Regulator, Police, UK Visas & Immigration, Ofcom, Information Commissioner, Care Quality Commission or Care Inspectorate Wales</p>	
Major governance issues	
<p>Mass resignation of trustees, leaving the Charity unable to function</p> <p>Evidence that trustees have routinely signed blank cheques</p>	<p>One or two trustees stepping down at year-end, due to other commitments</p>
Fundraising issues	
<p>Suspicious of unauthorised public collections in the name of the Charity</p> <p>Charity hasn't complied with law on requirements for solicitation statements or professional fundraising agreements</p> <p>Significant funds, due under a fundraising arrangement, have not been paid by the professional fundraiser, or commercial partner to the Charity</p> <p>Incident has taken place involving a fundraising agency which will incur serious damage to the Charity's reputation</p>	<p>A missing collection tin thought to contain a small sum of money</p> <p>Failure of a sponsor, e.g. of a local fun run, to submit small amounts of money raised for the Charity</p>

Serious incidents to report	Incidents not to report
Data breaches or loss	
<p>Charity's data has been accessed by an unknown person; this data was accessed and deleted, including the Charity's email account, donor names and addresses</p> <p>A Charity laptop, containing personal details of beneficiaries or staff, has been stolen and there is no encryption or other security measures that would prevent the perpetrator from accessing this information</p> <p>A Data Protection Act breach has occurred and been reported to the ICO</p>	<p>A Charity laptop or mobile phone (not containing confidential data) has gone missing – it's been reported to the police</p>
Incidents involving partners	
<p>A delivery partner of the Charity is alleged to have links to terrorism and extremism</p> <p>A delivery partner of the Charity has ceased to operate and this has prevented the Charity from providing assistance to its beneficiaries</p> <p>The Charity's subsidiary trading company has gone into liquidation and this has resulted in financial difficulties which place the future of the Charity in doubt</p> <p>Staff of another organisation within the same federated structure are found to have been committing systematic abuse of beneficiaries and this has significantly damaged the reputation of the Charity</p>	<p>A serious incident has taken place involving a partner but it has no or minimal impact on the Charity's reputation or the partner's ability to deliver its work with the Charity</p> <p>A delivery partner of the Charity has ceased to operate and this has had some impact on the Charity's ability to provide assistance to its beneficiaries but it is not a material impact and the assistance to beneficiaries hasn't stopped</p>
Other, including criminality	
<p>Any other type of incident that appears serious and likely to damage reputation or incur loss of charitable funds/assets</p>	

Serious Incident reporting form

Date the incident took place	<i>Day/month/year</i>
Name of person making the report	
Position/job title	<i>Chief Executive</i>
Authority to report this incident	Authority to report Serious Incidents to the Charity Commission is delegated by the Trustee Board, to the CEO, in the Charity's Serious Incident Reporting Policy
Date the Trustee Board was made aware of this incident	
Date the Corporate Trustee was informed	
Is another Charity affected by this incident	<i>Y/N</i> <i>If yes state which...</i>
When did the Charity become aware of the incident	<i>Date:</i> <i>Time:</i>
Has the Charity informed any other agencies of the incident? Local Authority, Police, HSE, other....	<i>List agencies and provide any reference numbers you have been given</i>
Describe the incident	<i>Provide a brief, factual and clear account of what happened</i>
Who has been affected & how	<i>Include the extent of any loss or harm include the extent of any loss or harm</i> <i>It is not necessary to provide the names of any individuals involved in the incident at this stage</i>
Is any of the data provided in the report sensitive or confidential in nature	<i>Y/N</i>
What information & why	<i>Provide detail and reasoning</i>
What action has the Charity taken/What action is the Charity intending to take	
How will the Charity prevent this from happening again?	
How is the Charity responding or preparing to respond to the media	<i>Provide key lines to take</i>
Serious Incident information update	<i>Date:</i>
Update information	<i>Provide brief but clear information on any material changes to the facts reported above.</i> <i>(This includes letting the Charity Commission know if individuals who were alleged to be responsible for wrongdoing are exonerated or the allegation was found to be false or groundless following further investigation by the Charity, the police or another regulator/agency.</i>

By virtue of paragraph(s) 1, 2, 3, 5 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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