CHARITY GOVERNANCE CODE ASSESSMENT – PRINCIPLE 3 – INTEGRITY

Reviewed 24.02.2021 and 17.01.2022

		Current Status	Suggested Action				
3.6 Up	3.6 Upholding the charity's values						
3.6.1	The board ensures that all of its decisions and actions are consistent with the charity's values.	Whilst none of the decisions have been in conflict with the Vison, Mission Purpose or Values there is nothing documented to reflect this.	Revise Board template to highlight and acknowledge alignment/at least confirm no conflicts explicitly. Status: GREEN, template amended February 2021.				
3.6.2	Trustees regularly check whether there are inappropriate power imbalances in the board or charity. Where necessary, they address any potential abuse of power to uphold the charity's purpose, values and public benefit.	Potential risk of imbalance due to unusual governance structure acknowledged. Members are appointed politically and the Trustee Board, as a council committee, is proportionately balanced to reflect the composition of the Council. Non-political (co-opted) trustee board members do not have a vote on board decisions, although their views are always welcomed and are taken into account. Whistleblowing Policy included in staff and trustee induction packs.	Board member induction to highlight how board members are appointed and support to recognise and prevent inappropriate imbalance on the Board. Regular reminders of: • Trustee duties • Option call a 'behind closed doors' meeting • Whistleblowing process if they have concerns of imbalances within the Charity (separating the board and charity). Action: - As part of annual board performance review, 1-1 conversations with the chair to raise concerns about imbalances of power - Amend Whistleblowing policy to reflect routes for the Board (Charity Commission, Corporate Trustee) Status: AMBER (in progress)				
3.6.3	Trustees adopt and follow a suitable code of conduct that reflects the charity's values and sets out expected standards of ethics, probity and behaviour.	Code of conduct is in place. It is covered at induction and is contained in the Trustee Handbook.	Status: GREEN				
3.6.4	The board considers how the charity is seen by the people and organisations who are involved in its work and by the wider public. The board has policies and procedures to make sure that the charity works responsibly and ethically, has regard to the proper use of power and acts in line with its own aims and values.	Website clear on purpose, mission & vision with links to key policies (Complaints, Whistleblowing, Fundraising, Privacy, Board Member Code of Conduct, EDI action plan). Policies are regularly updated and circulated to staff highlighting changes including. Pay Policy aims to meet LLW levels, park plans in place to protect biodiversity and working towards increased sustainability. Values include being open, feedback regularly sought including from stakeholder groups. Trustee board members have connections to the local community.	 Status: GREEN Additional aspirations: Stakeholder Survey, when resource allows. Open Forum proposed – to enhance feedback from the local community and hear directly from a wider range of people. 				

3.6.5	The board ensures that the charity follows the law. It also considers following non-binding rules, codes and standards, for example regulatory guidance, the 'Nolan Principles' or Charity Ethical Principles and other good practice initiatives that promote confidence in charities and create a supportive environment.	The Board considers advice provided by Corporate Trustee Interim Head of Legal and Governance and/or the Trust's retained legal providers when making decisions. The Trustees are committed to the Nolan Principles, which are included in the Trustee Board Code of Conduct. Legal and regulatory alerts to be included in Board information packs.	Status: GREEN Charity Ethical Principles to be considered in the next review of the Code of Conduct, which currently bases its principles on the 1994 Nolan principles. Consider suitability for AP/repetition of CGC.	
	.7 Ensuring the right to be safe			
3.7.1	Trustees understand their safeguarding responsibilities and go beyond the legal minimum to promote a culture in which everyone feels safe and respected.	Safeguarding Policy in place – regularly updated as guidance changes. Policy included at induction and included in Trustee Handbook. Trustee Board has appointed a Lead Board Member for Safeguarding & Whistleblowing Executive Leadership Team Member appointed as senior safeguarding lead.	Additional actions: 'Everyone feels safe and respected' to be tested in next staff survey scheduled for 2022/23 postponed due to Covid and replaced with wellbeing surveys. Planned signage in keys areas such as ice skating creativity pavilion and toilets	
3.7.2	The board makes sure that there are appropriate and regularly reviewed safeguarding policies and procedures.	Safeguarding Policy updated annually as part of policy review. Last updated March 2020 along with Whistleblowing, Complaints & Serious Incident Reporting Policies. Recruitment & Selection & Exit procedures in place.	Status: GREEN Next review of policies to include wording to ensure that if any serious issues are raised these would be notified to the CEO and the Board notified as appropriate.	

3.7.3	As part of a charity's risk-management process, the board checks key safeguarding risks carefully and records how these are managed.	Safeguarding and protecting people from harm included on the Strategic Risk Register (reviewed quarterly by ELT, FRRAC & Board). Creative Learning: Ensure that a teacher, youth worker, care worker or other group leader from the host organisation is present during workshops delivered by Alexandra Palace. 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 with ratios set for large groups. AP holds Ice Rink coaches NISA licenses and renewal documents which include safeguarding training. Licensed and registered chaperones during Pantomime performances. AP's Venue Management Plan (VMP) includes procedures for a lost child or vulnerable adult. Age restrictions for unaccompanied children for events are	Status: GREEN Safeguarding workshop to be annually repeated.
3.7.4	All trustees, staff, volunteers and people	assessed before tickets go on sale and are then enforced on entry to the building. Standing item on Board agenda re feedback from Safeguarding Lead and to report incident, including serious incident reporting to Charity Commission. Annual workshop to review key safeguarding risks and how managed and report to Board. Safeguarding included in staff handbook and covered at induction and e-learning	Status: GREEN
	who work with the charity have information or training on the safeguarding policy, so they understand it, know how to speak up and feel comfortable raising concerns	module for all staff members. Clear information in Safeguarding & Whistleblowing Policies around speaking up. In addition, staff and volunteers delivering Regulated Activity receive proper supervision.	
3.8	Identifying, dealing with and recording conflicts of interest/loyalty		
3.8.1	The board understands how real and perceived conflicts of interests and conflicts of loyalty can affect a charity's performance and reputation.	Discussed on induction. Legal provider facilitated refresher training on conflicts of interest in Sept 2019. Register of interests reviewed annually and as required through the year.	Status: GREEN
3.8.2	Trustees disclose any actual or potential conflicts to the board and deal with these in line with the charity's governing document and a regularly reviewed conflicts of interest policy.	Conflicts of Interest Policy and declaration signed by all trustees on appointment. Policy last updated Feb 2020. All board members are invited to disclose interests of at each meeting and any disclosures are recorded.	Status: GREEN Continue to disclose and assess annually.
3.8.3	Registers of interests, hospitality and gifts are kept and made available to stakeholders in line with the charity's agreed policy on disclosure.	Register of interests reviewed annually at Board meetings and published as part of this. Gifts & Hospitality register is maintained and is available on request.	Status: GREEN

3.8.4	Trustees keep their independence and tell the board if they feel influenced by
	any interest or may be perceived as being influenced or to having a conflict.

Trustees have in recent years identified where there could be perceived conflicts of interests/ duties particularly where some Board Members sit on other bodies involved in Licensing, Planning or Friends Groups and have acted accordingly i.e. not taken part in decision making and this has been recorded in the minutes.

Status: GREEN Continue to disclose and assess conflicts at each meeting.