

# Equality, Diversity and Inclusion Policy

## 1. Purpose

The purpose of this policy is to draw together our approach and principles in relation to Equality, Diversity and Inclusion as both a provider of entertainment, leisure, and experiences for our visitors and as an employer.

# 2. Policy Statement

Alexandra Park and Palace Charitable Trust and its trading subsidiary APTL hereafter known as Alexandra Palace is fully committed to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to our organisation.

Alexandra Palace is committed to enriching lives, through great experiences, for the enjoyment of the public forever.

We work to develop quality experiences that meet our visitor needs, provide inclusive experiences and engage with the public and our local communities.

We recognise that certain groups in society may experience prejudice, discrimination, and / or less favourable treatment on the grounds of their protected characteristics as defined within the Equality Act 2010, and that this limits people's choices and opportunities.

We will not discriminate because of age, disability (physical or mental), gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation.

We will not discriminate because of any other irrelevant factor and we will build a culture that is open and genuine and values fairness and transparency.

We recognise our responsibility for improving equality by:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people;
- Encouraging people from protected groups to participate in activities where their participation is disproportionately low.

We also recognise the <u>Charity Commission diversity and inclusion strategy</u> which sets out four key objectives:

- Meeting our statutory requirements and going beyond this by taking positive action and building a culture that champions diversity and inclusion
- Maintaining our representation where we are doing well and improving our representation in areas where we could improve
- Creating an inclusive culture, that values diversity, in how we treat each other and interact with those that we regulate and come into contact with

In implementing this policy, we will:

- Meet legislative requirements;
- Define our operational approach and intended outcomes;
- Monitor and report on progress

#### 3. Scope

The policy is applicable to all employees, casual staff, agency staff, volunteers, clients, suppliers and contractors, whether permanent or temporary. The policy applies to all processes relating to employment and training and to any dealings with customers and clients. Decisions relating to customers will be based on business-related criteria only and any irrelevant information will not form part of the process.

#### 4. Responsibility

Our Board has overall responsibility for setting the strategic direction and for establishing policies and plans to ensure that the governance and promotion of the Equality, Diversity and Inclusion policy is compliant with the statutory framework that prohibits discrimination.

The Chief Executive, Executive team, and Senior Management team have day-to-day responsibility for the operation of the policy, ensuring it is up to date, and taking appropriate action should any breach of the policy occur. Members of the Executive team and Senior Management team are individually and corporately responsible for ensuring that the policy is implemented in their areas of responsibility.

All managers are responsible for demonstrating good practice and vigilance in identifying and preventing unacceptable behaviour.

All staff, including consultants, contractors, agency workers, and volunteers, have a responsibility to recognise and respond to Equality, Diversity and Inclusion issues, and to uphold the principles of this policy. They are responsible for ensuring that the policy is incorporated into their work activities and in all their dealings with customers, colleagues, and anyone else they come into contact with during the course of their work. This includes events and activities as well as work-related social events.

Our stakeholders are expected to respect and uphold the principles within this policy, and not to discriminate or induce discrimination.

Any breach of this policy will be taken very seriously and we will take a zero tolerance approach towards unlawful discrimination. Any member of staff who is found to have

committed acts of discrimination or harassment will be subject to appropriate disciplinary action.

#### 5. Policy Implementation

We are committed to our organisational values, they describe what we stand for – the core principles we live by every day at work, guiding our behaviour and decisions. They define what we can expect from each other and what our customers expect from us.

We are Open and Genuine – We are inclusive and diverse welcoming all though our doors. We are genuine; we do what we say we will and do it in a way that is in line with our values. Behaviours relating to our value of Open and Genuine and examples of inclusive practices are included in our behavioural competency framework and will form an integral part of performance reviews throughout the year.

Through the approach set out in this policy we will encourage a culture where the principles of Equality, Diversity and Inclusion are treated as integral to everything we do. We will consider the needs of all individuals in shaping our policies, providing experiences, and in relation to our employees.

We will eliminate all forms of unlawful discrimination, harassment, and victimisation in all parts of our organisation.

We work to foster good relations and advance equality of opportunity between those who share a protected characteristic and those who do not share by tackling prejudice and promoting understanding.

## 5.1 Awareness and Training

We recognise that while legislation provides guidance it does not necessarily change behaviours to make a fair and inclusive society. We appreciate that we need to provide information, training, and guidance to enable our employees to fulfil their responsibilities and to ensure we are an inclusive and fair employer.

We will communicate our values and approach to our staff, volunteers, Board Members, customers, partners, and suppliers. We will also provide training, which begins with induction, for our staff, volunteers to enable them to understand their responsibilities and implement this policy. This includes e-learning modules for office based staff and face to face training for other staff.

#### 5.2 Meeting the needs of our customers

We will be sensitive and responsive to the needs of individuals and specific groups and will work closely with customers, making reasonable adjustments wherever practicable. We believe that all customers should be able to access our site and events safely with the same ease, and that the quality of our service is the same high standard for all.

Alexandra Palace has made a number of adjustments to improve accessibility at events. Given the nature of this historic listed building, it is not always possible to accommodate all requests. If a visitor has specific accessibility requirements, they can contact<u>Access@alexandrapalace.com</u> before their visit so we can seek to provide them with the best experience possible at Alexandra Palace.

Accessible tickets are available online and include access to a viewing platform plus a free personal assistant or essential companion ticket. Due to Licensing and Health & Safety Assessments, the number of accessible tickets we can admit to the platform is limited. Therefore, once this allocation has sold out, we are not able to release any more.

We will make people aware though the Alexandra Palace Website and Social Media Channels of particular relevant information regarding a performance for example the use of strobe lighting and the potential impact on those individuals with photosensitive epilepsy or haze and the potential impact on those with breathing difficulties.

We will ensure that our policies and processes do not discriminate against any individual person or specific groups of customers, and that our site, building and events are physically accessible to all where practicable.

We are working towards ensuring that our website is accessible to all customers.

We will seek feedback from our customers through our visitor surveys, social media accounts and review sites and actively work with customers to address any concerns in order to improve our service and increase satisfaction.

## 6. At Work

We aim to create a working environment where all employees, volunteers and other partners feel able to contribute to the best of their potential and have the skills to achieve the organisation's commitments and strategic goals. We will strive to ensure that all individuals are treated fairly and with respect. This applies to all areas of employment including recruitment, promotion, training, pay, and working conditions.

We will create inclusive and fair policies and practices in order to recruit, develop, and retain a diverse and culturally-aware workforce, and work to ensure staff are positively engaged.

We recruit, develop, and promote staff on the basis of a fair, objective assessment of competence and potential, and aim to ensure that no job applicant receives less favourable treatment on the grounds of any protected characteristic. We recognise that the Equality Act 2010 allows positive action to encourage people from groups with different needs or with a past track record of disadvantage or low participation to apply for jobs.

We will seek to comply with Race, Gender, Disability, and Equal Pay Codes of Practice, and any other guidance issued by the Equalities and Human Rights Commission in relation to the Equality Act 2010.

We will work to provide opportunities for employment for people with disabilities where possible.

We will, where possible, make reasonable adjustments to working practices, terms and conditions, and facilities to meet the needs of individual employees and groups of employees.

Staff concerns regarding equality-related malpractice or wrongdoing will be managed according to the Whistleblowing Policy. Advice and support regarding Equality, Diversity and Inclusion issues and/or service delivery may also be requested from the HR team.

#### 6.1 Equality Analysis

Proposals to significantly change or develop the way we do things and policies will include an analysis of the potential impact on groups with protected characteristics. Where the analysis identifies an adverse impact upon a group(s) we will, wherever possible, take mitigating action.

We will analyse the impact of our work with the aim of:

- Eliminating discrimination, harassment, victimisation, and other unlawful conduct.
- Advancing equality of opportunity between those who share a protected characteristic and those who do not.
- Fostering good relationships between those who share protected characteristics and those who do not.
- Achieving positive outcomes for all our visitors.

#### 6.2 Representation

We will work to ensure that our Board and our employees reflect the diversity of the sectors, communities and industry in which we operate.

#### **6.3 Contractors and Partners**

In order to meet our legislative and regulatory requirements and organisational objectives, we acknowledge that we are stronger working in partnership with our stakeholders and other organisations that share our values.

We will promote equality through our procurement practices, with our consultants, contractors, and suppliers who provide services on our behalf. We expect our partners to commit to the aims and principles set out in this policy, and to reflect these in the way they do business with and engage with our organisation, customers, and stakeholders.

# 7. Feedback

Any one visitor who is dissatisfied with any aspect of our service will have the opportunity to seek redress through our Complaints Policy. We welcome all feedback, good or bad, to get in touch go to <u>www.alexandrapalace.com/get-in-touch/feedback/</u> or call 020 8365 2121.

## 8. Data protection

Alexandra Palace processes personal data collected in relation to any aspects of Equality, Diversity & Inclusion in accordance with the General Data Protection Regulation (GDPR). Data collected from employees through the promotion of Equality, Diversity and Inclusion are held securely and accessed by, and disclosed to individuals only for the purpose of Equality, Diversity and Inclusion. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the Alexandra Palace's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under our disciplinary procedure.

## 9. Associated documentation and further information

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

- Recruitment and Selection Policy
- Recruitment Policy
- Complaints Policy
- Bullying and Harassment
- Whistleblowing Policy
- Behavioural Competency Framework

## 10. Status of policy

The policy will be reviewed on an ongoing basis to reflect changes in the law, demographics and internal business requirements. Progress relating to the policy will be recorded annually and a full report will be presented to the Executive team to debate progress and review the policy status.

Date	Version	Author	Amendments