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West
2-5 Rock Place
Brighton
BN2 1PF

Diversity & Inclusion Policy

Our commitment to diversity and inclusion at Locate Productions is committed to encouraging equality & diversity amongst our workforce and the crew we engage. We are committed to change and to giving opportunities to underrepresented and disadvantaged groups:

- People from minority ethnic groups
- Women in respect of roles in which they are currently underrepresented and disadvantaged
- LGBTQ+ people
- People with physical and/or cognitive disabilities
- Other people in underrepresented and disadvantaged socio-economic groups.

We are also committed to combatting unlawful discrimination.

To attract and retain employees we are committed to providing a collaborative, accepting and supportive environment for all employees.

Why we are making a commitment

The aim is for our workforce, the crew and others we work with to be truly representative of all sections of our society. We make that commitment because:

1. It is fair and just.
2. Diverse talents and opinions provide new and more varied solutions to clients of our business.
3. As an industry that is reactive to and informs cultural trends, our workforce should reflect the population we are advertising to.

Targets & Measurement

We will create both short and long term targets to improve diversity amongst our permanent workforce and crew. Measurement and data are critical in judging the success of our diversity and inclusivity actions and those of the industry as a whole. So we will collect data recording the make-up of our staff and crews and use it in two ways:

1. We will analyse the data we collect and assess the effectiveness of the measures that we employ to increase diversity and inclusion. We will reconsider those measures and change or supplement them with new ones if the existing ones have been ineffective against the targets we have set.
 2. We will share our data with the APA so that they can use that data in their annual survey of diversity and inclusion (for which purpose the APA will anonymise our answers by using them as part of the total aggregate responses from APA members only).
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Appendix 1. Our plan to achieve our targets

1. When we recruit we will focus on reaching underrepresented and disadvantaged groups and making them aware of every opportunity. We will do that in two ways:

1.1 When recruiting for jobs we will ensure that the language used is neutral in terms of whom it might appeal to and is inclusive of people in underrepresented and disadvantaged groups.

1.2 We will do our best to reach underrepresented and disadvantaged groups with each job advert/notice, seeking out partnership organisations who are educating or seeking opportunities for such talent and building relationships with those organisations. The APA has a directory of such organisations, so that will be one of the resources we will use.

2. We will undertake training and provide it to our staff to better understand unconscious bias and promote among staff our objectives in respect of recruitment of staff and hiring of crew as per 1 above and our diversity and inclusion objectives generally as set out in this agreement.

3. We will provide paid internships and work experience (with travel expenses covered) for people from underrepresented and disadvantaged groups. We may offer:

3.1 One week's experience of our working environment to someone who approaches us seeking experience of our business, comprising shadowing one or more of our employees and learning about our business but not undertaking any work. That could be paid or unpaid or be expenses only and we will make that decision based upon the needs of the applicant, in terms of enabling them to access the opportunity.

3.2 A longer period of work experience or an internship for which they will be paid at least the minimum wage but ideally the living wage. This is important because people from underrepresented and disadvantaged groups are less likely to be able to afford to undertake unpaid work experience for any significant period of time and thus are less likely to be able to enter the industry if that is all that is on offer.

4. We will encourage our staff to become part of a mentorship programme and help them support their mentees.

5. We will create a safe and inclusive working environment:

5.1 We will continue to provide a working environment free from bullying, harassment, victimisation and unlawful discrimination, whilst promoting dignity and respect for all. We strive to be a space where individual differences and the contribution of all employees are recognised and valued.

5.2 We will ensure there are clear, well-communicated procedures in place explaining how to raise concerns or complaints. All relevant issues will be taken seriously and investigated. They will be considered and acted upon with a focus on independence, timeliness and impartiality. We will ensure that appropriate support is in place for those who raise complaints. As an organisation, we will learn lessons from complaints, and encourage the individuals involved to do so too.

6. We will raise awareness of our equality duties specifically around protected characteristics and our wider commitment to equality and inclusion; ensuring that all employees are aware of their responsibilities and the behaviours we expect.

Our ongoing commitment

Our ongoing commitment is to ensure the implementation of the plan and to review its success at regular intervals.

Appendix 2. Procedure for dealing with complaints of racism & other abuse on productions or in the workplace

The Commercials Diversity Action Plan focusses on race, but the procedure below can be used to address all forms of discrimination under the Equality Act. Bectu and the APA recognise that discrimination because of a protected characteristic within an organisation is unacceptable and unlawful. Forms of discrimination can range from unintentional misunderstandings and lack of awareness through to deliberate and/or malicious acts.

The Equality Act 2010 defines the nine “protected characteristics” as: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Those who believe they have been subjected to discrimination, or who believe they have witnessed discrimination in the workplace, should be confident in raising the matter and be assured that it will be taken seriously. In an industry where most engagements are between one day and a week, it is possible that no one will still be employed on a production by the time a grievance is processed. This procedure has been developed in recognition of that. If a production company does not have its own in-house procedures then they can adapt this policy.

1. In order to drive racism out of the industry, it is everyone’s responsibility to report instances of abuse if they witness it, rather than leave it to the complainant. Bectu and the APA encourage every member of a production to become an ‘active bystander’, prepared to challenge inappropriate behaviour when it happens even when it is not directed at them.

2. Productions are of very short duration so it is imperative that issues are raised as soon as possible. However the completion of the production does not mean the end of any complaint: with effect from 1st November 2021 complaints made during or after productions will be investigated.

3. This procedure is available to anyone working on a production whether or not they are a member of Bectu. If the complainant (whether a victim or witness) is a member of Bectu they should contact the union which will:

- *Explain this procedure to them and discuss how they would like the issue to be progressed, such as informally or formally*
- *Offer to support them in raising the grievance*
- *Offer to help them to prepare any statements they need to write*
- *Offer to accompany them to any meeting*

4. If the subject of the complaint is a member of Bectu they should contact the union which will:

- *Explain this procedure to them and discuss how the issue would be progressed, whether informally or formally*
- *Offer to help them to prepare any statements they need to write*
- *Offer to accompany them to any meeting*

If both parties are members of Bectu, the union shall ensure that different officials will be assigned and respective confidentiality will be maintained.

5. If the subject of the complaint is the production company raise the issue with the production company MD or EP. If you are a Bectu member enlist the support of Bectu either at the outset or in the event that you do not consider the response you get from the production company satisfactory.

6. The complainant may in the first instance wish to raise the matter directly with the person who caused the offence if they feel this is appropriate.

7. If the complainant does not feel that is appropriate, complaints should be raised either during or after the production with the designated representative of the production company (see point 13 on the action plan) as named on the call sheet (who for brevity is referred to below as the manager).

8. All parties involved in a complaint are required to maintain strict confidentiality.

9. When handling a grievance about discrimination a manager should:

- *Keep an open mind – discrimination situations are often very individual and what may, or may not, be felt to be discriminatory can change over time, and from person to person*
- *Be respectful and empathetic to the worker who raised the complaint – it can be particularly upsetting and/or stressful to experience or witness discrimination*
- *Ensure that the matter is investigated thoroughly and be tactful when looking for evidence that supports or undermines the grievance*
- *Conclude and/or resolve the matter.*

10. The manager must keep a record of how they dealt with the problem, even if it is informal. The record should include:

- *What the problem was about*
- *What the manager did (such as have an informal meeting)*
- *What was discussed in any informal chat or meeting*
- *Any next steps agreed*
- *The reasons for any next steps, ensuring that all records conform with GDPR requirements*

The next steps should be clear, specific and measurable. For example, 'person A will do action B by date C, because of reason D'. The complainant will be given a copy of the record.

11. If the complaint is about actions that could constitute a criminal offence then it should be reported to the police for investigation.

The informal procedure

12. A person might wish for their complaint to be handled informally, for example where they are confident the matter may simply need bringing to the manager's attention to be resolved. While the manager should consider this it may not always be appropriate to follow it, for example the matter is extremely serious, or has been experienced by other workers too. Ultimately it is for the manager to decide whether to take any action and/or what process to follow.

13. When someone raises a complaint informally, the manager will arrange a private meeting as soon as possible to discuss it. The complainant can be accompanied by a person of their choice who could be a colleague, a union rep or union official. The complainant will tell the manager about the matter and the manager will listen and will ask them how they would like it to be resolved.

14. If the manager accepts that there is an issue to be resolved (ie contrary to the Code of conduct, page xx) the manager will have an informal discussion with the person alleged to have caused the offence, who can be accompanied by a fellow worker, union rep or union official. The manager will seek to resolve the matter informally as requested by the complainant. The focus is on repairing working relationships and agreeing acceptable standards of behaviour.

15. The manager could propose some form of support to help the person to understand the expectations of appropriate behaviour, such as training, mentoring, or mediation.

16. The manager will inform the complainant of the outcome and action taken and ask whether the problem is now resolved for them. If it is not, to move things forward the manager could:

- *Check any next steps have been completed*
- *set up more informal discussions*
- *Find out if anything else can be done*

The manager should remind the complainant that they can also raise the grievance formally.

The formal procedure

17. If it is not possible or advisable to resolve a grievance informally the complainant should raise the matter formally and without unreasonable delay with the manager.

18. The complainant should put it in writing and should explain the basis of the complaint and focus on facts.

19. Having received the complaint, the manager will write to the complainant arranging a meeting to discuss it. A colleague or trade union representative can accompany the complainant.

20. Following the meeting the manager will ensure an independent investigation of the complaint. This can be done in-house, but if this is not possible the manager can contact the APA for information about alternatives. The investigator will collect evidence relevant to the matter. The investigation can include meeting the person(s) raising the concerns and those who are the subject of the concerns, and any witnesses, and obtain any documents if relevant. A colleague, union rep or union official may accompany those involved. The investigation should aim to be complete within two weeks.

21. The investigator will present the evidence to the manager who will determine whether there is a case to answer. The manager will then inform the subject or subjects of the complaint and give them the opportunity to put their case in response before any decisions are made. They have the right to be accompanied by a fellow worker, union rep or union official.

22. The manager will then decide whether to uphold the grievance and if so what action they will take. They will inform both parties of this.

23. If the grievance is upheld and the party whose behaviour led to the grievance is employed on staff, the employer's disciplinary procedure should be used. If the party is freelance/ self-employed/no longer employed on the production, remedies could include requiring them to do any of the following:

- *Apologise to the complainant*
- *Meet with the manager who will discuss with them how to avoid a repeat of this in future*
- *Under take training*

- *Under take mediation (if the complainant is willing to do so)*
- *Understand that such behaviour, particularly if repeated, would make it less likely that the production company would wish to hire them for future engagements.*

24. The manager will keep a written record of the outcome, the reasons for the decision, and whether the required actions have been carried out. The complainant will be given a copy of the record.

25. If a complainant feels that their grievance has not been satisfactorily resolved they are entitled to appeal in writing to the company CEO within seven working days giving the grounds for their appeal. If there is no appeal within this timeframe the case is closed.

26. Appeals will be heard by the company's CEO.

27. Complainants can be accompanied at any such appeal hearing as above.

The outcome of the appeal should be communicated to the complainant in writing without unreasonable delay.

Locate Productions is an APA Member. This procedure applies where the production company organising the production is a member of the APA. You can check this by looking at the Members Directory on the APA website.

If the person wishing to raise a complaint is not a Bectu member they can still use this process in respect of an APA member company or any non-member company that has chosen to adopt a complaints process based on this template, but they are not entitled to the support of Bectu - also a membership organisation - in making that complaint. Fellow trade unions such as Equity and the Musicians Union are ready to assist their members in the same way set out above for Bectu.

