

# **National Gallery of Ireland**

## **Implementing the Public Sector Equality and Human Rights Duty:**

### **Implementation Plan**

**September 2025**

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## 1. Introduction

The Public Sector Equality and Human Rights Duty (the “Duty”) is set out in Section 42 of the Irish Human Rights and Equality Commission Act 2014. The Duty requires public bodies, including the National Gallery of Ireland (the Gallery), to consider equality and human rights on an ongoing basis in the planning and delivery of their functions.

The Duty has two interconnected elements:

- **The Overarching Duty (Section 42(1))** — a continuing obligation for public bodies to have regard to the need to eliminate discrimination, promote equality of opportunity and equal treatment, and protect human rights for employees, service users and policy beneficiaries, across all functions.
- **The Strategic Duty (Section 42(2))** — a targeted duty linked to the organisation’s strategic, planning and reporting cycle. The Strategic Duty requires public bodies to undertake three steps:
  - **Assess** — carry out an assessment of the equality and human rights issues facing the identified groups that are relevant to the public body’s functions and purpose, and make that assessment publicly available (for example, via its Strategic Plan).
  - **Address** — identify and set out, in the Strategic Plan, the plans, policies and actions being taken or proposed to address the issues identified in the assessment.
  - **Report** — report annually, for example in the Annual Report, on developments and achievements in implementing the Duty.

### Who the Duty Covers

The Duty applies to the Gallery’s interactions with both:

- **Identified groups**, including:
  - People protected under the nine equality grounds: gender (including gender expression, gender identity, and sex characteristics), family status (including lone parents and carers), civil status, age, disability (broadly defined to include all impairment groups), sexual orientation, race (including ethnic origin, nationality, and skin colour), religion and members of the Traveller community.

- People affected by socio-economic disadvantage, including those at risk of poverty or social exclusion.
- **Rights-holders** under relevant human rights instruments connected to the Gallery's functions.

## Scope of the Duty

The Duty applies to **all functions** of the Gallery. For this Implementation Plan, the focus is on core areas such as:

- Caring for, interpreting, developing and showcasing art in a national gallery that serves everyone.
- Developing, managing and researching the living collection for public benefit.
- Delivering educational programmes across all age groups.
- Overseeing corporate governance, including staff recruitment and employment.

This Plan outlines how the Gallery will fulfil its Duty in a structured, transparent and measurable way. It is informed by our equality and human rights assessment and evidence base, and aligns with guidance from the Irish Human Rights and Equality Commission (IHREC).<sup>1</sup>

## 2. Equality and Human Rights Values Statement

### 2.1 Introduction

This equality and human rights values statement guides how we implement the Duty in all areas of our work.

We focus on four inter-connected values that reflect our commitment to equality and human rights. These values are built on our corporate values, in particular our belief in *Openness*:

*“We engage with a wide range of audiences and stakeholders. We embrace diversity and promote equality. Our doors are open seven days a week and admittance is free.”*

For each value, the statement sets out:

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<sup>1</sup> Irish Human Rights and Equality Commission (2024) [Implementing the Public Sector Equality and Human Rights Duty: Guidance for public bodies second edition](#).

- a **Statement of Priority** — what we seek to achieve; and
- a **Statement of Process** — how we will work to achieve it.

These benchmarks capture our ambition for the Duty. The statement is specifically focused on, and addressed to, the identified groups for the Duty.

## 2.2 Equality and Human Rights Values Statement

### Dignity

Dignity means respecting people's diversity and welcoming them into the organisation. It involves treating everyone fairly, avoiding bias and stereotypes, and building trust.

**Statement of Priority:** The Gallery is committed to promoting a culture of respect and kindness. We aim to foster a sense of belonging, wellbeing, and safety among all stakeholders—internal and external, across the identified groups, so that people feel valued, comfortable, and confident.

**Statement of Process:** The Gallery will equip staff, volunteers, and Board members with the knowledge, tools and resources they need to promote trust, fairness and empathy in interactions across all our functions with people from the identified groups.

### Engagement

Engagement means having a voice, being heard, and knowing that your perspective matters. It involves listening to and meaningfully considering the needs, aspirations and expectations of a diverse range of people.

**Statement of Priority:** The Gallery strives to build systems and structures that amplify and value diverse voices among our internal and external stakeholders. We aim to enable these voices to inform our decisions in meaningful and sustainable ways.

**Statement of Process:** The Gallery will engage in a participative and collaborative manner with both internal and external stakeholders from diverse backgrounds. We will strive for transparent and accessible communication, enabling participation that is informed, inclusive and meaningful.

## Accessibility

Accessibility means recognising, and responding to the specific needs that arise from diversity. It involves addressing physical, digital, organisational, communication and emotional barriers that may be experienced by different groups.

**Statement of Priority:** The Gallery aims to be a leader in accessibility among cultural institutions, and to be recognised for continuously improving the accessibility of experiences for stakeholders from the identified groups.

**Statement of Process:** The Gallery will work in a flexible, adaptable and approachable manner, by putting structures and systems in place to identify and respond to the specific needs of diverse internal and external stakeholders.

## Inclusivity

Inclusivity means delivering positive outcomes for a diverse range of people through our functions. It means being relevant to, representative of, and a resource for, the diversity of our audiences and colleagues.

**Statement of Priority:** The Gallery strives to be a space, and act as a repository, where the diversity of the public is reflected, celebrated and encouraged to engage with the arts. We aim to build a diverse workforce that is valued across all levels of the organisation.

**Statement of Process:** The Gallery will work to embed equality and human rights values across all aspects of our work, including day-to-day interactions, strategic decision making and organisational goals.

# 3. Assessment of Equality and Human Rights Issues

## 3.1 Introduction

This is an assessment of the equality and human rights issues facing the identified groups under the Duty that are relevant to the functions of the Gallery. It is **not** an assessment of the Gallery's performance in relation to its work or its response to equality and human rights.

To ensure our work remains informed and relevant, the Gallery will update this assessment periodically, incorporating the latest data and insights across all functional areas.

The assessment is guided by the four values that shape our commitment to equality and human rights — **dignity, engagement, accessibility and inclusivity**. These values provide a comprehensive lens through which we examine the issues.

The issues identified below apply to all of the identified groups for the Duty unless otherwise indicated. These groups include:

- The nine grounds covered by equality legislation
- Individuals affected by socio-economic disadvantage
- People at the intersections of these grounds
- Rights-holders under the various human rights instruments relevant to our functions.

In certain cases, specific groups are highlighted to provide deeper insight where data shows:

- A distinct experience related to the issue(s), or
- Significant or persistent inequality, discrimination, or human rights violations

In addressing these concerns, we recognise the need to confront the various forms of oppression experienced by these groups, including **racism, classism, ableism, homophobia, transphobia, sectarianism, sexism and ageism**.

## 3.2 Assessment of Equality and Human Rights Issues

### Dignity

Dignity means respecting people's diversity and welcoming them into the organisation. It involves treating everyone fairly, avoiding bias and stereotypes, and building trust.

The equality and human rights issues to be addressed, relevant to the value of Dignity:

- **Employment-related discrimination** — both individual and institutional, direct and indirect — in recruitment processes and/or in the workplace

In particular, the data highlight:

- High levels of discrimination, in seeking employment among Travellers, other minority ethnic groups, disabled people and transgender people
- High levels of in-work discrimination affecting minority ethnic groups, women, disabled people and transgender people
- The hidden nature of indirect or institutional discrimination, where seemingly neutral policies or practices result in disadvantage or negative consequences for people from the identified groups, without reasonable justification

- **Discrimination in accessing and/or participating in public or private services** — both individual and institutional, direct and indirect  
In particular, the data highlight:
  - Higher rates of service access-related discrimination for Travellers, other minority ethnic groups, disabled people and young people (aged 18–25)
  - The hidden nature of indirect or institutional discrimination, where seemingly neutral policies or practices results in disadvantage or negative consequences for people from the identified groups without reasonable justification
- **Identity-based harassment and sexual harassment** in the workplace and/or in accessing goods and services, creating unwelcoming, intimidating, hostile, degrading or offensive environments for the identified groups  
In particular, the data highlight:
  - High levels of sexual harassment experienced by women in the workplace; and
  - High levels of identity-based harassment against Travellers, which diminishes their employment opportunities and professional development.
- **Stereotypes and biases** — rooted in historical discrimination and based on fixed, false and generalised assumptions about the identified groups. These lead to misrepresentation, diminished potential and restricted participation  
In particular, the data highlight:
  - Gender stereotyping of women in caregiving roles; employer assumptions about the availability or commitment of women of childbearing age or with children; and bias in performance evaluation and career progression for women, all of which negatively impact employment outcomes
  - Stereotyping of disabled people and older people regarding their capabilities in employment and service provision
  - Oppressive notions of superior and inferior cultures, resulting in negative treatment for minority ethnic groups
- **Xenophobic, anti-immigrant, transphobic and homophobic rhetoric, abuse and harassment**, and high levels of hate crimes and hate speech against Travellers, other minority ethnic groups, and LGBTQ+ people in public spaces and on social media
- **Lack of knowledge, understanding and/or capacity** among employers and service providers to effectively prevent and address issues of discrimination, identity-based harassment and sexual harassment affecting employees and service users

- **Significant under-reporting** of discrimination, both direct and indirect, in employment and/or service provision by the identified groups

## Engagement

Engagement means having a voice, being heard, and knowing that your perspective matters. It involves listening to and meaningfully considering the needs, aspirations, and expectations of a diverse range of people.

The equality and human rights issues to be addressed, relevant to the value of Engagement, are:

- **Lack of spaces and opportunities** for the diverse voices, of identified groups, to be effectively articulated. In particular, the data highlight:
  - Failure by service providers and employers to ensure that the perspective and lived experience of people experiencing inequality, discrimination and social exclusion inform priorities and approaches in employment and service provision
  - Underrepresentation of people from the identified groups in decision-making positions and in the structures that shape those decisions
- **Barriers to articulating individual perspectives and preferences** among members of the identified groups. In particular, the data highlight:
  - Perceptions of organisations as alien, elitist and not being open to diversity or to change
  - Low confidence in making choices and accessing available options, and exercising rights due to, the impact of discrimination, social exclusion, internalised oppression and stigma
  - Problematic use of a ‘medical model’ lens to disability (rather than a social model), which disempowers disabled people and fails to recognise them as experts on their own situations and needs
  - Inability to articulate issues and needs due to pressure to hide one’s identity, in particular for, Travellers, LGBTQ+ people and people with hidden disabilities
- **Failure to capture the perspectives and preferences** of the identified groups in general consultations. In particular, the data highlight:
  - Failure to track the voice and establish the specific perspectives of the identified groups in general consultation processes
- **Barriers experienced by the identified groups to posing a challenge or bring forward a complaint to an organisation.** In particular the data highlight:

- Perceptions of an organisation as hostile and not open to taking on a challenge or responding positively to a complaint
- Lack of channels and procedures to receive and address complaints and challenges, or where these exist, failure to communicate how to access and use them
- **Lack of information available to the identified groups to enable engagement.** In particular, the data highlight:
  - Lack of information and understanding of the avenues available to engage and have a say
  - Barriers to accessing information and making informed choices — especially for individuals with literacy challenges, those facing digital inequality, and people whose first language is not English

## Accessibility

Accessibility means valuing, and responding to the specific needs that arise from diversity. It involves removing physical, digital, organisational, communication, and emotional barriers that may be experienced by different groups.

The equality and human rights issues to be addressed, relevant to the value of Accessibility, are:

- **Lack of systems and failure to make adaptations for diversity**, resulting in unmet specific needs and limited access to services and employment. In particular, the data highlight:
  - A lack of flexibility and adaptability in the design and delivery of services, programmes, and supports
  - A lack of flexibility and adaptability in job design, and in the manner in which work is managed and the workplace organised
  - Failure to provide additional supports required to enable access and participation
  - Workplace dress codes that prevent people from expressing their true selves, particularly Roma women and Muslim women
- **Lack of universal design** leading to access barriers, in public spaces, workplaces, and service environments
- **Inaccessible communication** that does not reach or engage the identified groups due to unsuitable formats, channels, content, or language used. In particular, the data highlight:

- Lack of consideration for language diversity, including Irish Sign Language<sup>2</sup> and social/regional accents and dialects
- Overlooking literacy barriers
- Inaccessible IT systems and digital platforms<sup>3</sup>
- Inaccessible communication materials, including failure to use alt text
- Imagery that does not reflect or connect with diverse communities
- **Insufficient understanding of intersectionality** leading to experiences of multiple and compounding discrimination and inequality among identified groups
- **Digital inequality**, including digital constraints and digital exclusion, across the identified groups. In particular, the data highlight:
  - Digital constraints due to limited skills or digital literacy, especially among older people
  - Digital exclusion caused by lack of access to devices and/or broadband, affecting people living in poverty, direct provision accommodation, overcrowded housing (including Travellers) and disabled people.
- **Invisibility of diversity and representation in the cultural sector.** In particular, the data highlight:
  - Lack of understanding, recognition and visibility of minority cultures
  - Experiences of being subjected to dominant cultural norms
  - Cultural policies and programmes failing to address disadvantage and inequality
  - Underrepresentation of the identified groups, and lack of relevance of cultural institutions to these groups
- **Invisibility of diversity and lack of evident welcome and support** for diverse identities in the workplace and in service settings
- **Lack of equality data** on employment and service provision, hindering efforts to measure diversity and monitor outcomes for specific groups
- **Limited capacity and knowledge among employers and service providers** to identify, understand and respond to the practical implications of diversity
- **Isolation and social exclusion** experience by the identified groups, negatively affecting access and participation in employment and services. In particular, the data highlight:
  - Travellers, LGBTQ+ individuals and people with hidden disabilities feeling compelled to hide their identity in the workplace, due to fear of negative treatment
  - Migrants, particularly those whose first language is not English, undocumented migrants, and people seeking international protection and living in direct provision

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<sup>2</sup> Failure to comply with the Irish Sign Language Act 2017.

<sup>3</sup> Failure to comply with the EU Website Accessibility Directive (EU 2016/2102) and the EU (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulation 2020 (S.I. No. 358/2020).

- Barriers to social inclusion for older people, particularly those living alone or in rural areas, disabled people and people living in poverty

## Inclusivity

Inclusivity means delivering positive outcomes for a diverse range of people through our functions. It means being relevant to, representative of, and a resource for, the diversity of our audiences and colleagues.

The equality and human rights issues to be addressed, relevant to the value of Inclusivity, are:

- **Unemployment and under-employment across the identified groups.** In particular, the data highlight:
  - Low levels of labour market participation among young people, people with disabilities, Travellers and other minority ethnic groups, Trans people, Intersex people and lone parents
  - Lack of employment and training-related networks and connections for Travellers, to support access to employment
  - Barriers to employment for migrants with insecure immigration status
  - Underemployment of women due to caring responsibilities and being unable to take up full-time employment
  - Lack of, and barriers to accessing, placements and internships for young people and other identified groups
- **Lack of access to promotion and career opportunities** across the identified groups. In particular, the data highlight:
  - Higher rates of promotion-related discrimination in the workplace for women, older people, and people with disabilities
  - Inadequate or hostile responses to staff transitioning to their true gender at work
  - Impact of caring responsibilities on women's access to promotion and other career opportunities
- **Lack of access to and participation in cultural life as consumers,** across the identified groups. In particular, the data highlight:
  - Lack of participation of older people
  - Gendered participation patterns among children, and differences between Irish and migrant children
  - Discouragement from participation due to lack of outreach, expectations of inaccessibility and discrimination, and lack of recognition and visibility for minority cultures

- Perceptions of cultural institutions as elitist and non-inclusive among people with disadvantaged socio-economic status
- Specific barriers for migrants, particularly those whose first language is not English, undocumented migrants, and people seeking international protection and living in direct provision
- Lack of adequate and appropriate mediation to support engagement and understanding for groups experiencing inequality and disadvantage;
- Financial cost as a barrier
- Adults from lower income groups, and their children, being less likely to engage in structured cultural activities, such as attending an art gallery
- **Lack of access to and participation in cultural life as producers**, across the identified groups. In particular the data highlight:
  - Lack of presence for the identified groups as cultural producers
  - Lack of support to bring their work into public spaces
  - Lack of understanding and appreciation of diverse norms and forms of expression in organisational engagement with cultural producers
- **Lack of access to and engagement with the living collection of cultural institutions** including issues related to historical discrimination, affecting the identified groups
- **Lack of research and knowledge development** concerning the representation of identified groups and their participation as consumers and producers in cultural life
- **Lack of understanding and/or valuing of cultural and ethnic diversity, including by cultural institutions.** In particular, the data highlight:
  - Depictions of Travellers in art that rely on settled people's representations and stereotypes about the Traveller community
  - Arts organisations and venues being less likely to 'take risks' on Black artists compared to White Irish peers, who are commonly seen as unlikely attract audiences and/or to be 'understood by White Irish audiences'
- **Poverty across the identified groups.** In particular, the data highlight:
  - Low income levels due to unemployment and concentration in part-time or precarious employment
  - Dependence of social protection supports
  - Gender and ethnic pay and pension gaps
  - The intersection of socio-economic disadvantage with identity-based inequality and discrimination – especially for lone parents, Travellers, minority ethnic groups, disabled people, older people, young people who are not in education, training or employment and transgender people

- **Inadequate response to caring responsibilities**, to allow women and men, and lone-parents, to participate equally in employment and in accessing services. In particular, the data highlight:
  - The unequal sharing of caring responsibilities between women and men
  - The lack of affordable and accessible childcare provision
  - The absence of adequate flexible/work-life balance employment options
  - The lack of provision for children and childcare in service-provision settings

## 4. Enabling Implementation

### Leadership

The Executive Leadership Team (ELT) provides leadership for the ongoing implementation of the Duty, ensuring it is given appropriate priority across the Gallery. In doing so, the ELT:

- Is familiar with the Duty and its requirements
- Considers its implementation as an agenda item at appropriate points during the year
- Links deliberations and communications back to the equality and human rights values statement, reflecting the ambition captured by the Duty

A cross-organisational working group is convened with responsibility to:

- Prepare an annual plan for the implementation of the Duty, including actions to enable implementation, actions to give effect to the overarching Duty, and actions to give effect to the Strategic Duty
- Track and support the implementation of the annual plan by the responsible departments throughout the year
- Prepare an annual report on progress and achievements in implementing the Duty and organise a reflection process to extract learning from this

The Equality, Diversity, and Inclusion (EDI) Manager holds overall responsibility for managing the ongoing implementation of the Duty across the organisation.

### Capacity

The Gallery will develop and deliver familiarisation sessions for staff on an ongoing basis. These sessions will cover the Duty, our approach to its implementation and the values that motivate our commitment to equality and human rights. This familiarisation will be embedded in induction processes and reinforced through ongoing training and development.

Specific training on conducting Equality and Human Rights Impact Assessments will be provided, as required, for staff responsible for reviewing or developing plans, policies, programmes or strategies.

The Gallery will build and sustain working relationships with a broad range of representative associations for the identified groups. This engagement will focus on the ongoing implementation of the Duty and include at least one annual meeting.

## **Communication**

Communication on the Duty, on progress and achievements in its implementation, and our corporate values, including those motivating our concern for equality and human rights, will be sustained through:

- Staff town hall meetings
- Emails to staff across all functions
- The staff intranet
- Team meetings
- Creative presentation of our corporate values, and the values motivating our commitment to equality and human rights, in office and public spaces

## **Equality Data**

Equality data systems will be maintained and developed, to the extent possible, to enable reporting under the Duty.

In particular, an equal opportunities section will be included in public consultations, engagements, or surveys, to ensure the perspectives of the identified groups are captured and tracked.

The purpose of collecting equality data will be clearly communicated, and disclosure will remain voluntary.

## **Documentation**

A Public Sector Equality and Human Rights Duty page will be maintained on the Gallery's website. This page will include:

- The equality and human rights values statement
- The assessment of equality and human rights issues and the evidence book
- This implementation plan
- Annual plans for the Duty

- Annual reports on progress and achievements in implementing the Duty

Records, in the form of completed Equality and Human Rights Impact Assessment templates, will be maintained to document implementation of the overarching Duty.

## **5. Implementation**

### **5.1 Foundations**

The Strategic Plan reinforces our ongoing implementation of the Duty. Steps are taken in its preparation to:

- Update the assessment of equality and human rights issues and include a link to this in the Strategic Plan
- Update the implementation plan for the Duty and include a link to this in the Strategic Plan
- Identify key plans, policies and actions in place, or proposed, that address equality and human rights issues
- Identify the infrastructure in place for the Duty

The annual strategic plans of each department form the foundation for the annual plan for implementing the Duty. The plans, policies, programmes or strategies to undergo an Equality and Human Rights Impact Assessment, under the overarching Duty, are identified in these annual strategic plans at the start of each year. This includes items scheduled for development or review, as well as those that would benefit from an equality and human rights lens. Plans, policies and actions, whether in place or proposed, that target identified groups or address specific equality and human rights issues under the Strategic Duty are similarly identified at the start of each year.

### **5.2 Overarching Duty**

An Equality and Human Rights Impact Assessment is undertaken in the development or review of all plans, policies, programmes or strategies, including such as:

- Organisational policies
- Departmental strategies
- Programme plans
- Infrastructural developments, including refurbishment and display rehanging
- Developments in systems, websites and digital platforms

In cases where the Gallery operates through unwritten processes, a framework based on the equality and human rights values statement will be developed to guide compliance with the Duty.

Procurement processes will also incorporate the Duty, ensuring that successful contractors are made aware of and comply with relevant obligations.

### **5.3 Equality and Human Rights Impact Assessment**

An Equality and Human Rights Impact Assessment is undertaken to give effect to the ongoing Duty under Section 42(1). It forms an integral part of the development and review process for all plans, policies, programmes and strategies.

Responsibility for conducting the assessment rests with the department leading the development or review of the relevant plan, policy, programme or strategy. A template is available to assist (see Appendix One).

**At the start of the development/review process**, the department:

- Reviews the assessment of equality and human rights issues to identify those issues relevant to the plan, policy, programme or strategy
- Gathers data and information related to the identified issues, utilising the assessment evidence book
- Reviews the equality and human rights values statement to extract the statements of priority or statements of process that are relevant

**During the development/review process**, the department:

- Includes relevant equality and human rights issues into any evaluation or contextual review
- Communicates obligations under the Duty to external consultants and ensures they are fully briefed
- Monitors relevant issues to ensure they are addressed in line with the ambition outlined in the Equality and Human Rights Values Statement

**At final draft stage of the development/review process**, the department:

- Convenes a meeting of relevant staff to check that the draft adequately addresses each equality and human rights issue, and aligns with the values statement, using the provided template (see Appendix One)
- Where appropriate, conducts participatory exercises for large-scale initiatives with the Duty working group and representatives of identified groups to ensure issues are properly addressed

**After the development/review process**, the department:

- Establishes or uses existing monitoring systems to track progress and achievements in addressing the equality and human rights issues
- Reports annually on progress made to the EDI Manager and the cross-organisational working group for the Duty
- Uses these reports to reflect on progress and strengthen the plan, policy, programme or strategy as necessary.

## 5.4 Strategic Duty

The Gallery has developed and is implementing a detailed programme of actions to directly address equality and human rights issues relevant to its functions. This action plan encompasses:

### **Cross-Departmental Initiatives:**

#### **Accessibility and Disability Inclusion**

Responsible: All website/platform owners

- Integrate accessibility and disability resources across all Gallery functions, especially digital and web platforms
- Regularly monitor websites and digital platforms to identify and resolve accessibility issues
- Ensure all digital content is created in accessible formats

#### **Gender Equality in the Arts**

Responsible: Education, Library & Archives and Curatorial Departments

- Highlight women artists featured in the collections
- Digitise works by women artists to improve access and visibility
- Collaborate with women's support groups on community projects
- Host the annual Sarah Cecilia Harrison lecture and award to celebrate contributions by women in the arts

#### **LGBTQ+ Awareness and Engagement**

Responsible: Education, Library & Archives and Curatorial Departments

- Deliver inclusive tours, workshops and long-term projects that promote LGBTQ+ visibility and awareness
- Strengthen the Gallery's role as a national leader in LGBTQ+ cultural programming

#### **Public Programming for Equality**

Responsible: Education, Library & Archives and Curatorial Departments

- Design and deliver programmes that promote equality of opportunity, focusing on gender, poverty and social exclusion

- Address barriers to participation and create opportunities to engage with the Collection. Initiatives include:
  - SMBC Aviation Capital Education Programme
  - Positive action in selection criteria for Education projects
  - Free or subsidised Education programmes available nationwide
  - Free Library and Archives programming

### **Autism and Sensory-Friendly Initiatives**

Responsible: Universal Design and Accessibility Working Group

- Maintain accreditation with AsIAM to support autism-friendly practices
- Identify and establish designated quiet spaces in galleries and office areas to support sensory needs

### **Department-Specific Initiatives**

#### **Exhibitions and Collections Department**

- Apply the Equality and Human Rights Impact Assessment into the project management and delivery of exhibitions.
- Collaborate across departments to incorporate EDI considerations into exhibition design.
- Enhance artist participation and improve access to Portrait Prize application processes.
- Improve and monitor the accessibility of the online collection.

#### **Curatorial Department**

- Research on race, donors, gender identities and LGBTQ+ histories in the national collection to inform future Gallery activities and programming
- Address sensitive materials through an in-house cross-departmental forum to manage language, materials and imagery in collections
- Examine donor and patron wealth creation and address historical exploitation through adherence to donor charters and due diligence procedures, including the establishment of the John Barry Brown and Petronella Brown Fellowship

#### **Education Department**

- Appoint a Cultural Art Therapist in Residence to increase diversity and equality for audiences and address socio-economic exclusion
- Expand audience diversity using census information and programme feedback, enhancing the guide panel and tours programme to include Polish, German, Ukrainian, then Hindi, Arabic, Portuguese, Romanian, Lithuanian and Russian speakers
- Address identified issues for young people by harnessing the potential of the Youth Panel to inform relevant aspects of Gallery Operations and promote inclusion

- Support and engage schools in locations the Gallery has not previously reached, across the country, and in areas of social and economic deprivation in the city
- Expand upon current autism and sensory-friendly initiatives, including the completion of the ARTistic research and consultation project, for future integration of its recommendations

### **Library & Archives Department**

- Ongoing integration of accessibility and disability-focused tools in communications and outreach programme, including: closed captioning and, where possible, sharing of scripts in digital outreach programming; and virtual Reading Rooms
- Diversify the Gallery's art, library and archival collections through strategic acquisitions that reflect our audiences and measure progress via agreed methodologies
- Ongoing monitoring of digital platforms such as Source and online library catalogues and addressing any issues with regard to web/digital accessibility

### **Communications, Media and Digital Engagement Department:**

- Actively promote human rights and equality issues in communications strategy (internal and external)
- Ensure internal and external communications make use of gender-neutral language where appropriate
- Ongoing monitoring of the Gallery's main website and addressing any issues with regard to web/digital accessibility
- Advise and support colleagues with meeting web accessibility requirements in relation to any content prepared for the Gallery's main website

### **Publications and Images Department:**

- Ongoing monitoring of the images website and addressing any issues with regard to web/digital accessibility

### **HR Department:**

- Improve diversity and inclusion in recruitment, including: process to capture EDI data at job application/onboarding stage; increase reach of advertisement of job vacancies; train interviewers; and accessibility audit of recruitment process
- Ensure compliance with the Disability Act 2005: Part 5 returns; annual disability survey; and sustain achievement of target of 6%
- Train and inform staff to embed equality and human rights in their daily activities, raise awareness of the Duty, and provide ongoing support through training, induction, policy awareness, staff events and surveys

- Develop and implement an EDI Policy
- Continue to support staff in enabling work/life balance through flexible and remote working arrangements
- Ongoing monitoring of HR systems and platforms and addressing any issues with regard to web/digital accessibility

#### **Finance Department:**

- Integrate equality and human rights and accessibility considerations into budgetary and procurement processes and procedures
- Ensure compliance with the Gender Pay Gap Act 2021, undertaking annual reports on the gender pay gap in the organisation and taking action to respond to any issues that emerge

#### **Legal & Compliance Department:**

- Advise and support colleagues (website owners) with meeting web accessibility requirements for their websites, platforms and content
- Promote a 'data protection culture' and embed data protection by design and by default

#### **Operations Department:**

- Continue to address universal design and accessibility issues onsite, prioritising remedial works, and in all new developments and future renovations
- Address gaps in current services and resources to encourage and facilitate family visits, including: gender neutral nursing spaces in offices and public spaces; and dedicated pram/buggy storage – **with Universal Design and Accessibility Working Group**
- Ensure a gender-inclusive physical environment for staff and audiences, including: gender-neutral toilets in offices and Gallery space, and provision of free period products in all toilets – **with Universal Design and Accessibility Working Group**

#### **Universal Design and Accessibility Working Group:**

- Maintain an oversight role in relation to Universal Design and web accessibility across the Gallery
- Maintain membership of the Hidden Disabilities Sunflower Scheme
- Increase staff and public awareness of the Gallery's participation in both the Sunflower Scheme and the JAM Card initiative
- Ensure front-of-house staff receive training in JAM Card and Sunflower Scheme awareness
- Sustain and expand current autism- and sensory-friendly initiatives
- Maintain AsIAM accreditation

- Identify and promote designated quiet spaces within gallery and office areas

## 6. Report

The Annual Report of the Gallery will include a section on the developments and achievements in implementing the Duty.

This report will identify:

- new outcomes for the identified groups for the Duty
- developments and improvements in the delivery of the Gallery's functions
- improvements in departmental processes that embed a focus on equality and human rights

The working group will develop this report, with the EDI Manager, and will organise or support a reflection process on this report to celebrate success and, where necessary, to strengthen initiatives addressing equality and human rights issues.

## Appendix: Equality and Human Rights Impact Assessment Template

1. At the start of the development or review process, extract the equality and human rights issues, from the assessment, that are of relevance to this plan, policy, programme or strategy (in column 1).
2. Identify (in column 2.), at final draft stage, whether each of these issues is addressed in the current draft plan, policy, programme or strategy, and where it has been addressed (Column 3.).
3. Identify how the text of the draft plan, policy, programme or strategy could be amended to ensure each of the issues is adequately and appropriately addressed (column 4.)

### A. Purpose and beneficiaries of the plan, policy, programme or strategy?

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### B. Equality and Human Rights Impact Assessment

**Dignity** is about respect for the diversity of people and a welcome for them within an organisation. It involves fairness in the treatment of this diversity of people, an absence of bias and stereotyping, and trust building.

Equality and human rights issues identified from the assessment	Is this issue addressed? (fully/ partially /no)	Section(s) where this issue is addressed	Amendments required to adequately and appropriately address the issue

**Engagement** is about having a say, being heard, and having one's voice valued in decision-making. It involves listening to and giving meaningful consideration to the needs, aspirations, expectations and perspectives articulated by the diversity of people.

<b>Equality and human rights issues identified from the assessment</b>	<b>Is this issue addressed? (fully/ partially /no)</b>	<b>Section(s) where this issue is addressed</b>	<b>Amendments required to adequately and appropriately address the issue</b>

**Accessibility** is about diversity, valuing diversity and responding to the specific needs that arise from diversity. It involves addressing all barriers, physical, digital, organisational and emotional, that can be experienced by the diversity of people.

<b>Equality and human rights issues identified from the assessment</b>	<b>Is this issue addressed? (fully/ partially /no)</b>	<b>Section(s) where this issue is addressed</b>	<b>Amendments required to adequately and appropriately address the issue</b>

**Inclusivity** is about outcomes for the diversity of people within and through the functions of an organisation. It involves being relevant to, representative of, and a resource for the diversity of people.

<b>Equality and human rights issues identified from the assessment</b>	<b>Is this issue addressed? (fully/ partially /no)</b>	<b>Section(s) where this issue is addressed</b>	<b>Amendments required to adequately and appropriately address the issue</b>

### **C. Alignment with the Duty**

What further text to refer to the Duty and its implementation should be included in the plan, policy, programme or strategy?

What further text to refer to the equality and human rights values should be included in the plan, policy, programme or strategy?

Are the KPIs identified for the plan, policy, programme or strategy sufficient to track progress and report on achievements in addressing the equality and human rights issues? If not, what further amendment or addition is required?