



Westminster Educational Institutions Venue Hire Guidance

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1.	<i>Aim and Scope</i>
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The purpose of this document is to support Westminster’s educational institutions in facilitating responsible and non-discriminatory hire of their premises.

Regardless of intent, being associated with any individual or organisation that promotes extremism or intolerance is damaging to an institution, as is wrongfully denying a platform to a legitimate organisation or speaker. Furthermore, institutions no doubt share the council’s commitment to free speech and freedom of expression. Discussion and debate demand a tolerant atmosphere; those who promote intolerance and prejudicial views pose a threat to this.

The purpose of this document is not to tell institutions who they should or should not hire their premises out to. Instead, it is intended to support institutions in assessing the potential risks posed by an event before coming to an informed decision. The final word on who can hire a premises, remains a decision for the institution.

2.	<i>Relevant Legislation</i>
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The need for institutions to strengthen their approach around events and space hire is justified by the Counter-Terrorism Act 2015 and related policy and guidance, which places a duty on the education sector to have due regard to the need to prevent people being drawn into terrorism (Revised Prevent Duty Guidance for England and Wales 2015).

The necessity of robust procedure is further upheld by:



- Terrorism Act, 2000 & 2006
- Human Rights Act 1998
- Equality Act 2010
- Racial and Religious Hatred Act 2006
- Public Order Act 1986

3. *Risks*

Having a robust premises policy fulfils legal obligations relating to counter terrorism, and also guards against a range of potential risks.

If an institution has hired a space to an organisation or individual preaching extremism or hate speech, there will be a link between the school and organisation, which could damage the reputation of the institution.

If a speaker or group's presence attracts protest, there is the potential risk of public order offences on or outside the premises. Being aware of potential protest, and having a robust policy can help ensure that staff or individuals on the premises are adequately safeguarded from harm.

Additionally, if a legitimate speaker is wrongly denied a platform, this may be seen as the institution stifling freedom of speech, and could invite negative public opinion and reputational damage.

4. *Responsibility and management*

Clear delegation of responsibility and management of bookings will help to guard against these potential risks.

Internal Management

Room booking requests should be managed in the same way each time, and ideally by the same designated person. If responsibility is held by more than one individual, it should be ensured that the process is fully understood by all parties, and implemented in the same way across the organisation. For the purpose of this guidance the responsible person will be referred to as Booking Officer throughout.

The Booking Officer has responsibility for gathering and storing information on the individual making the application. In cases of repeat requests, due diligence checks should still take place, but storing previous applications will make this process more efficient. A post-event summary or review could also be conducted to better facilitate repeat bookings.



External management

Should an institution use a third party, such as an external event management company, for their room bookings, they should ensure that a process is in place whereby applications are still being assessed robustly. If there is an application of concern, it is recommended that an escalation process exist whereby the final decision rests with the institution, not with the external agency. Terms and conditions of this should be agreed at the outset of the agreement with the third party.

5.	<i>Process</i>
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When an initial request is made, it should be directed to the Booking Officer, who can identify if the event is logistically feasible and if there are any immediate concerns that rule out the request completely. If there are no issues, the Booking Officer can request more information through an application form, questionnaire, or tick list. A template application form is provided at the end of this guidance.

Ensure that sufficient time is given for checks to take place. This may mean bookings with less than two weeks' notice are rejected at initial enquiry, but the specifics of notice time will depend on the institution's capacity.

5.1 Asking the right questions & checking facts

Gather the following information from the applicant:

1. Who is the individual or organisation booking the event?
 - ask for their name and any associated names they operate under
 - ask for their address and a phone number
 - get details of the individual or organisation's website and associated websites
2. What are the details of the event: theme; title; agenda; content; speakers; expected audience numbers and demographics; details of how the event will be promoted (ask for copies of flyers/posters etc.); is the event open to the public or ticket only?
3. Does their event comply with the institution's equality and diversity policy?

Primarily, the Booking Officer should identify if the organisation or any speaker is associated with:

- a) Organisations which have advocated acts of terrorism
- b) Home Office Proscribed Organisations
(<https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2>)

If the answer is yes to either of the above, the event would be illegal if it went ahead.



Even if the answer is no, it does not mean that the institution would necessarily want to give the group or individual a platform, so due diligence around the information should continue in order to confirm details:

- **Review their website and other materials:** such as published articles or speeches. Check that the website is being kept up to date, and if they have a business address and landline number to confirm their legitimacy. If there are initial concerns, the institution may wish to request copies of their materials for the event in question (PowerPoint slides, handouts, speech outline)
- **Consult partner organisations:** should the speaker or organisation have connections with, or has made recent appearances with other organisations, request a reference.
- **Consult public opinion online:** through blogs, opinion pieces, and reviews. But be mindful of the credibility of open source information. Ensure research is balanced between opinion and primary source material, such as YouTube videos of previous appearances.

5.2 Assessment and making a decision

The Booking Officer should ask the following questions based on the research:

- Does the content of the event undermine your equality and diversity policies?
- Has the speaker publicly expressed an opinion that is at odds with your equality and diversity policies?
- Does it promote the intolerance of individuals or groups in the community?
- Has the speaker previously promoted messages of hatred or intolerance toward any particular groups?
- Has the speaker or organisation been banned from previous speaking events?
- Has this speaker or organisation been subject to protest before? Is this likely to happen again given the subject of the event?

This is not an exhaustive list and may be adapted according to need. Keep in mind that questions cannot be seen to unlawfully discriminate (Equality Act 2010). Consultation with colleagues, and trusting professional judgement will lead an informed decision.

5.3 Outcome

Accepting

If no risk is found, agreement will include adhering to the institution's equality and diversity procedures, and signage of any other documentation required. This may form part of a contract where fee and compliance with internal procedures, are jointly agreed and signed off. Part of this sign off should include a right to withdraw from the agreement should information come to light that changes the level of risk.



Accepting with conditions

Should there be no reason to refuse, but reason to believe the event would invite protest or other disturbance, some measures may need to be put in place to mitigate risk. Consult with partners who may have had similar events, and consult with the speaker themselves to ascertain if they have security in place. Examples of risk mitigating conditions may include: informing police and ensuring appropriate provision is placed outside and around the venue; or placing conditions on the applicant, such as allowing the event to go ahead but refusing certain proposed speakers, or demanding a more balanced representation.

Refusing

If the risk is deemed high enough based on the information gathered through checks, the booking should be refused. It is important that reasons for refusal very clearly do not breach the individual's rights, and therefore decision making should be formed around the key areas stated above.

5.4 Monitoring ongoing bookings:

On occasions where an ongoing booking is made (for example a recurrent weekly class), checks should be carried out every so often to ensure the booking remains legitimate.

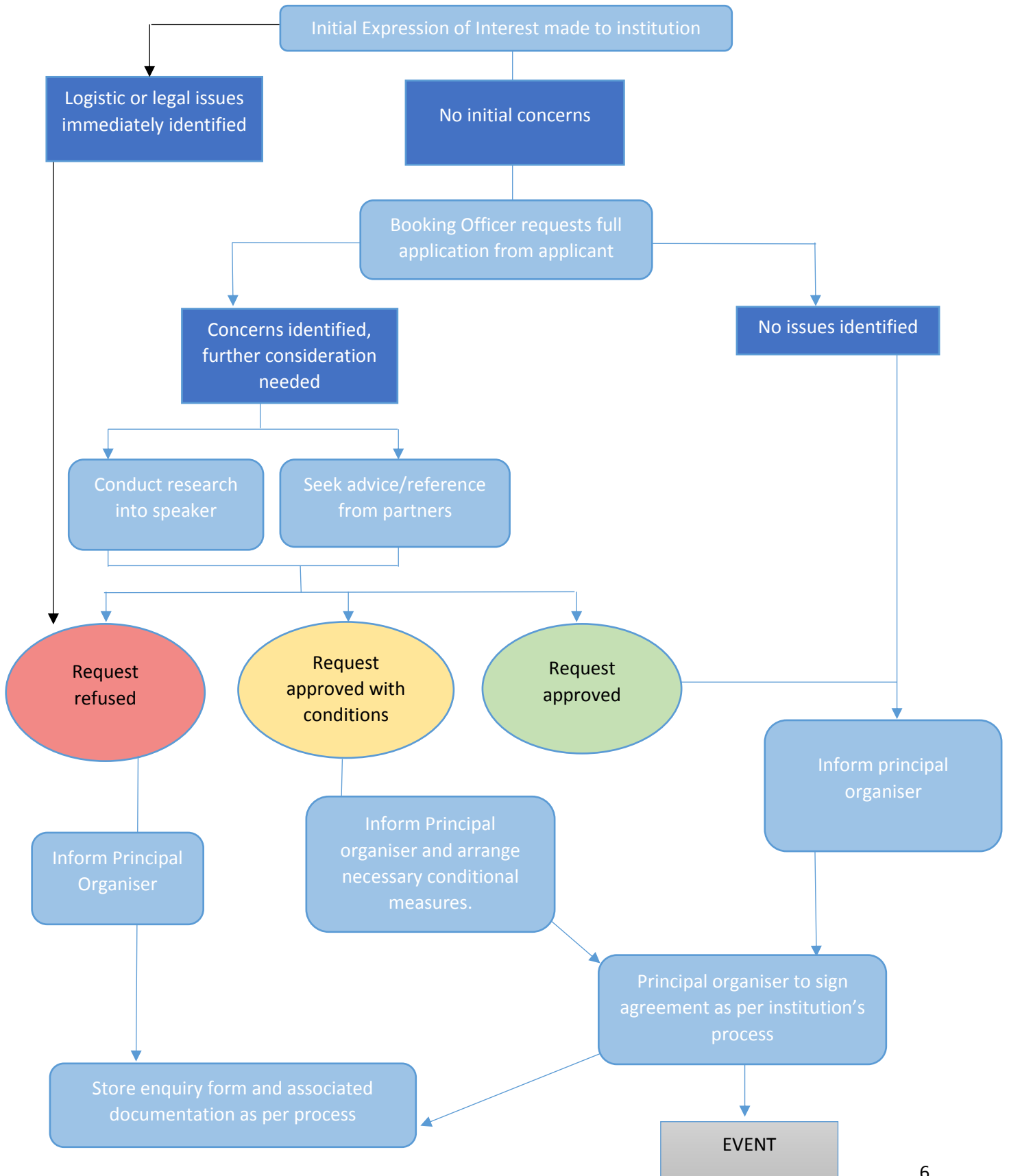
The booking officer can do this through in several ways:

- Conduct occasional monitoring checks on the provided information. For example, check for updates or changes to the website, check for most recent articles or opinion pieces on the organisation.
- Drop in on a scheduled session, to confirm that the room is being used for the expected function.
- Ensure part of the application/hire agreement includes requirement that the institution be informed if any changes are made to the booking, such as a change in speaker, change in contact details or organisation connections.

Ticking these boxes ensures the institution is fulfilling its requirements throughout the period of hire.



6. Process Flowchart





7. Template booking form

Room Hire Request Form	
<i>To be filled in by booking officer</i>	
Booking Officer:	
Date request received:	
<i>To be filled in by external contact</i>	
Request made by	
Contact number	
Contact email	
EVENT DETAILS	
Lead contact (if different from above)	
Event title	
Date and time	
What will the event involve	<i>Please give as much detail as possible of what the event will entail, including details of what the talk/event will cover</i>
Anticipated number of attendees	
How and where has the event been advertised	<i>Is the event open or closed to particular networks? Has the event been advertised online? etc</i>
SPEAKER DETAILS	
Name of speaker	
Speaker's contact email	
Organisation(s) speaker associated with	
Information on speaker and associated organisation(s) e.g. website, published works, general background	
RESOURCES AND MATERIALS	
What equipment do you require:	
What resources will you be using:	
Do you consent to training material (e.g. powerpoint) being made available to the Booking Officer prior to event?	



I have read and accepted terms and conditions set out, including the institution's equality and diversity policy, and I agree to adhere to the principles and values set out by the institution. If any information provided should change before the event takes place, I agree to inform the institution of these changes. I understand that the institution may reverse their decision if new information comes to light that contradicts the initial terms of hire.

Applicant	Signature:	Date:
Booking Officer	Signature:	Date: