

PREVENT

Venue Hire Policy

Counter Terror and Extremism: Due Diligence Checklist

February 2026

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1. Scope

This policy applies to all council premises whereby venues / room bookings are taken. It gives guidelines to staff and managers on the process to be followed, and the information and considerations needed before approving and confirming reservations.

Update (Martyn's Law): The Terrorism (Protection of Premises) Act 2025 received Royal Assent on 3 April 2025. The Government intends an implementation period of at least 24 months before commencement, during which statutory guidance will be issued and the Security Industry Authority (SIA) will establish its new regulator function. This policy sets proportionate steps to prepare for compliance.

The policy also sets out how we can effectively apply additional rules and conditions to mitigate / minimise risks.

2. Responsible Booking

The Government's statutory Prevent duty makes a mandatory requirement that the Council ensures that publicly-owned venues and resources do not provide a platform for extremists and are not used to disseminate extremist views. In addition, the Council recognises, now enacted as the Terrorism (Protection of Premises) Act 2025 (Martyn's Law), which introduces a tiered duty for qualifying premises and events to assess and mitigate terrorism risks proportionately. Please see Appendix 1 for information on the main legislation/guidance governing this Policy. This includes actively reducing permissive environments by ensuring events do not enable extremist narratives, normalisation of extremist ideology, or unchallenged dissemination of radicalising content.

Hirer declaration required to comply with PPPs/PPMs and avoid permissive environments.

The Council will work through the multi-agency Prevent Partnership and local CONTEST Board to ensure coordinated risk management.

Decisions and referrals will follow lawful information-sharing provisions under CTSA Sections 29 and 38.

Workflow to notify SIA regulator will be completed once guidance is published.

The Council reserves the right in its absolute discretion not to hire its venues to:

- Any organisation or individuals that do not conform to the values (equity, fairness and inclusivity) of the Council, or that are banned or proscribed by law, OR
- For political rallies or demonstrations which incite hatred or violence or any breach of criminal law and / or spread hatred and intolerance.

Furthermore, the Council reserves the right to refuse to grant, or cancel, permission with immediate effect:

- If any or all parts of the event are considered by the Council, in its reasonable opinion, to be dangerous, offensive, noxious, illegal or which may become a nuisance to the Council or any other occupiers in the areas (or any neighbouring property) where the event is held;
- If the organisers are found to have falsely represented the event at the time of booking, but are subsequently found to breach the principles set out here.
- Or, if the Council is not satisfied that the safety of the buildings and the public can be ensured.

No individuals or groups will be denied the opportunity for access to Council managed venues unless there is a justifiable reason to do so within the spirit of this Policy.

3. Roles and responsibilities

This policy will help you to assess the potential for any risks that need to be managed when taking venue bookings for events / working with organisations using Council resources. It will not apply to

all situations or events but provides a starting point to identify and address concerns when you are unsure about an organisation, group or individuals. Your judgement is important. Use the **checklist** in this guide to help you to assess the risk and consider the options.

For organisations in the Enhanced Duty, designate a senior individual with responsibility for Martyn's Law compliance and maintain an auditable record of decisions, actions and reviews.

Training: Record all ACT Awareness/ACT Security completions (date/time, role), local procedures briefings, and scenario exercises. Evidence must be available for inspection.

A Responsible Person and Deputy must be named for each venue/event.

The decision to accept a room booking or support an activity and whether to take further action is your teams / organisations responsibility.

To allow fair and transparent decision making, you should seek, consider and record basic information.

4. Decision making

It is important to document your decision making. Make sure that you store any information in line with the records management policy and data protection arrangements.

Use dynamic risk assessments for specific events and maintain centralised records (risk assessments, PPPs/PPMs, training logs, incident debriefs) to demonstrate proportionate, reasonably practicable measures.

Add a Security Threat Check prompt reflecting current local threat picture.

Where an event/ activity is to go ahead, consider making additional conditions to make sure that it's managed properly and make it clear that breaching these conditions could lead to cancellation. For example:

- Making an event/activity open to the public.
- Mandatory attendance of persons who can provide an alternative voice to ensure fair debate.
- Giving guidelines regarding language or topics that will not be tolerated.
- Insisting on an independent chair person or observer.
- Restricting the sale of alcohol or other products.
- Asking speakers to provide copies of presentations in advance and agree not to deviate from this.
- Restricting what banners, placards, leaflets, electronic materials and so on are allowed at the event/ activities.
- Insisting that an event is recorded in case of future complaint.

5. Non-council owned premises

In relation to non-council owned premises there are a number of issues to consider:

Health and safety considerations: Some events can attract significant attendance with the potential for disorder outside their premises and health and safety implications for their staff. Sunderland City Council can help your organisation to assess the risk and advise private venues accordingly.

Regulations: A range of regulations are relevant to events (for example licensing, environmental health, noise pollution) and discussion should be had to look at whether an event conforms to the relevant regulations.

Reputation: Venue owners may want to be made aware if there are concerns about a radicalising influencer using a private venue for an event in view of the potential reputational impact on the venue.

Charities: Trustees have specific duties under charity law which are relevant to the protection of their institutions. The Charity Commission has a variety of guidance available for trustees, including Chapter 5 of the Compliance Toolkit ‘Protecting Charities from abuse for extremist purposes’.

6. Security Threat Check (STC)

Decision-makers must document consideration of the Security Threat Check (STC):

- STC1 – Alignment with current terrorism threat picture and extremist narratives (national/local).
- STC2 – Audience/context factors that could amplify risk (including community tensions).
- STC3 – Proportionate mitigations (conditions of hire, staffing, PPPs/PPMs, digital controls) reduce residual risk to as low as reasonably practicable.

7. Digital Permissive Environments (Standalone Controls)

To prevent creation of digital permissive environments, the following must be in place:

- Segregated guest Wi-Fi with content filtering to block extremist/terrorist material; logs retained per policy.
- Controls on AV inputs (e.g., USB/CDN) and pre-screening of presentations/videos where proportionate.
- Acceptable Use Policy issued to hirers; explicit prohibition on streaming/uploading extremist content.
- Real-time response plan for misuse (disconnect, preserve logs, escalate to Prevent SPOC/Police).

8. Named Prevent Lead and Escalation

Local Authority Prevent Lead (SPOC): Louise Butler

Escalation route: Venue Manager → Community Safety Team → Prevent Lead (Louise Butler) → Northumbria Police Prevent Team (as required).

9. Monitoring, Assurance and Record-Keeping

Maintain a central register of: risk assessments (Part 1 & 2 + STC), conditions applied, hirer declarations, PPPs/PPMs, training logs (ACT/Prevent), incident logs and debriefs. Review quarterly.

In addition, digital safety measures must be in place to ensure that council-managed IT infrastructure, including public Wi-Fi and AV systems, are not used to promote extremist content. IT systems should be monitored and filtered in accordance with the council's acceptable use policies. Systems must also prevent the creation of digital permissive environments, including blocking extremist content and monitoring attempts to misuse digital infrastructure.

Training should include modules such as ACT (Action Counters Terrorism) e-learning and internal safeguarding protocols. Refresher training should be provided annually or when significant policy updates occur.

All staff involved in the venue booking process must receive appropriate training to identify and manage risks associated with extremism and terrorism. This includes awareness of the Prevent Duty, Martyr's Law, and the use of the venue risk assessment checklist.

Risk Assessment Part One - Who wants to use your venue?

Ensure Prevent Duty considerations include identifying any conditions that could create permissive environments, such as lack of challenge to extremist viewpoints, inadequate staff supervision, or insufficient digital controls.

- Name of event:.
- Review schedule: PPPs reviewed every 6 months; PPMs/security plan quarterly/post-incident.
- Name and contact details for person requesting the event/ activity.
- Type of event - for example training.
- Approximate number of people.
- How is attendance/ involvement being arranged?
 - A. Invite only
 - B. Open invite – still need to book
 - C. Open invite to all members of the public
- How is the event/ activity being advertised? For example, word of mouth, social media.
- Will the media be present?
- Is the event going to be segregated?
- List details below of any key contacts, main organisers or any speakers, including organisation / group / charity they represent and include:.
- Name
- Role
- Organisation
- Phone Number
- Email
- Contact details for a venue / location previously used by the individuals/ group/ organisation (advise them that you may contact).

Is wider consideration and research required? YES / NO (If you have selected YES complete Checklist Part 2)

Risk Assessment Part 2 – assessment and research

	Impact Assessment Score
1. Check the list of proscribed groups . This is a list of groups or organisations banned under UK law. If the organisation is listed as a proscribed, do not proceed and contact the Community Safety Team and consider informing the Police.	1 2 3
2. If concerns are raised but the organisation is not proscribed, conduct an internet search to research the organisation, topic or speakers. Log your findings of your internet search and the date of the search.	1 2 3
3. If a charity, check and record if it is registered on the Charity Commission website	1 2 3
4. Are there concerns that this could contravene Sunderland City Council policies / values or breach UK law, The Human Rights Act 1998 and The Equality Act 2010? Yes / No	1 2 3
5. Is there a chance this could cause community tension or impact on community cohesion / relations? Record YES or NO and any further details	1 2 3
6. Is there a chance that an event or activity could attract counter protest groups? Record YES or NO and any further details	1 2 3
7. Is there a risk to the Council's reputation? Record YES or NO and any further details	1 2 3
8. Are there Health and Safety issues to be addressed or will security be required? Record YES or NO and any further details	1 2 3
9. Please record any additional comments (including, where applicable any mitigating circumstances that may impact on the level of risk)	1 2 3

Add up the numbers for each score 1 = Low, 2 = Medium and 3 = High. The categories will help you to assess any risks.

Assessment of Risk

<p>Score of 8 or under Green (low/no risk)</p> <hr style="border-top: 1px dashed green;"/> <p>Continue with the booking</p>	<p>Score of 9-14 Amber (medium risk)</p> <hr style="border-top: 1px dashed orange;"/>	<p>Score 15-21 Red (high risk)</p> <hr style="border-top: 1px dashed red;"/>
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If anything changes before the date of the event, you may wish to review the booking and complete a further risk assessment

Discuss with your line manager and the Community Safety team before you confirm the event booking.

If you decide to go ahead, ensure you have the right management arrangements in place to react to, manage and log any situations that could lead to reports of breaches in the Human Rights Act and Equality Act 2010, including the potential for disorder.

This will need to be raised with Northumbria Police's Prevent Team for advice, before any confirmation of the event booking.

Contact details:
Northumbria Police on 101

Useful Contacts:

Northumbria Police on 101 or in an emergency 999

Community Safety Team on 0191 520 5550 or community.safety@sunderland.gov.uk

Appendix1:

Decisions and referrals will follow lawful information-sharing provisions under CTSA Sections 29 and 38.

The main legislation/guidance governing this Policy

Statutory guidance issued under s29 of the Counter-Terrorism and Security Act 2015 makes explicit reference to the 'Use of local authority resources' and outlines expectations of partnership working and that 'local authorities should ensure that publicly-owned venues and resources do not provide a platform for extremists and are not used to disseminate extremist views' through the establishment of a responsible booking policy for public venues.

As a responsible authority under the Crime and Disorder Act 1998, the Council also has a statutory duty to work in partnership with other agencies to reduce and prevent crime. Maintaining public order is a priority for a Local Authority and the Police, therefore when an event poses a risk to the general public, there are grounds to review and reconsider venue hire. Where the property is not under Local Authority control, they can provide advice to the property owners/occupiers.

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. In some limited situations, certain freedoms are qualified, meaning that public authorities may interfere with them. This is only possible where the authority can show that its action has a proper basis in law, and is necessary and proportionate in order to protect public safety, public order, health or morals, or the rights and freedoms of others.

The Equality Act 2010 requires public bodies to have due regard to the need to eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act as well as advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not. The latter relates to the need to tackle prejudice and promote understanding.

The law introduces a tiered approach based on the capacity of a venue

Local authorities and venue operators must ensure that appropriate counter-terrorism measures are in place, proportionate to the size and nature of the venue or event.

This policy aligns with Martyn's Law by incorporating risk assessment procedures, due diligence checks, and conditions for safe venue hire.

Tier thresholds (for planning): Standard Duty (200–799 individuals reasonably expected at one time); Enhanced Duty (≥800 individuals). Standard focuses on simple Public Protection Procedures (PPPs). Enhanced requires documented Public Protection Measures (PPMs) so far as reasonably practicable, and a written security plan.

Estimated maximum individuals reasonably expected at one time (capacity) and Tier classification (Standard 200–799 / Enhanced ≥800).

Is notification to the SIA required on commencement? YES/NO (if in scope).

PPPs in place for this booking: evacuation, invacuation, lockdown, communication (summarise).

For Enhanced: proposed PPMs (e.g., monitoring/CCTV, search/screening, route management, vehicle control).

Staff training evidence to be checked (ACT Awareness/ACT Security; local procedures).

Are there cyber–physical vulnerabilities relevant to the event (e.g., misuse of public Wi-Fi/AV to disseminate extremist content; access to digital operating procedures)?

Tier confirmation and SIA notification (if applicable).