EVENTS POLICY

ISLAMIC CENTRE OF ENGLAND LIMITED (the Charity)

1. INTRODUCTION

1.1 This Events Policy (the **Policy**) sets out a framework for the Charity's trustees and staff members (together, the **Personnel**) to follow in connection with an event organised and/or promoted by the Charity:

1.1.1 in advance of posting to any of the Charity's social media accounts (including, but not limited to, the Charity's website, Facebook, Instagram, X (formerly Twitter) page and YouTube);

1.1.2 in advance of inviting people to participate in and/or granting permission to persons to speak, recite, promote or undertake a role of responsibility at or during Charity events and programmes[1].

1.2 The Policy should be read in conjunction with the Charity's Social Media Policy.

1.3 The Policy is intended to facilitate the Charity's activities and support its engagement on social media (in line with the Social Media Policy), such that:

1.3.1 "business as usual" activities (being those deemed part of its weekly religious or educational programme), and

1.3.2 similarly routine religious obligations which are private events carried out in the Charity's premises, being limited to families and friends, such as the gatherings (*majlis*) which take place to mark births or deaths in accordance with accepted Islamic practices (*milat*) and which are only accessible to those individuals concerned,

can occur without placing unreasonable or disproportionate levels of due diligence or administration requirements on the Charity or its Personnel.

1.4 This Policy applies to all events, programmes and/or activities which take place at the Charity's premises save that where an event, programme or activity takes place at the Charity's premises and it is not a) substantially organised by the Charity nor b) promoted publicly by the Charity (a **Third Party Event**), the Charity's Third Party Venue Hire Policy will also apply in addition to this policy and Third Parties will be required to sign Terms and Conditions of Hire.

1.5 Where activities do not form part of the Charity's weekly routine religious or educational programme, or are not covered by 1.3.2 above, and/or there are features of any particular activity (including a Third Party Event) which are novel or could be regarded as high risk[2], then the relevant Personnel should exercise greater prudence and seek to assess any wider risks and issues associated with the event and then consult with and gain prior approval of the Trustee Board.

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[1] The Charity should exercise judgement and assess whether due diligence should be undertaken on any person engaged by or with the Charity in a capacity which goes beyond their mere attendance at a community event. This is because any person who could be seen as promoted by, affiliated to, representing or endorsed by the Charity could be presumed to have been vetted by the Charity.

[2] High risk could include (but should not be limited to) where there is substantial media or public interest in a topic/matter, where a matter is known to, or is likely to, divide opinion, where something has been subject to criticism or complaint in the past, where there is strong political opinion surrounding a matter (even if the Charity's position itself is apolitical).

1.6 Any questions about the Policy or any of its contents should be submitted to the Trustee Board. If there is any doubt as to whether something has been approved in accordance with the Policy it should be referred to the Trustee Board for confirmation.

1.7 All Personnel recognise that the Trustees have ultimate legal responsibility for ensuring that the Charity's events and activities further the objects of the Charity and are in its best interests, and that the same comply with relevant Charity Commission guidance, in particular guidance on Campaigning and Political Activity for Charities, CC9.

1.8 All staff members must comply with the Policy at all times. Any breach could lead to disciplinary action.

1.9 The lead staff member for this Policy is the Centre Manager. The lead Trustee is Abbas Hussein, Chair of Trustees.

2. HOW TO USE THE POLICY

2.1 Personnel must refer to the relevant parts of the Policy in undertaking due diligence **in advance of** any event, relevant activity and/or posting content to the Charity's social media accounts (as applicable).

2.2 Trustees in particular should use the Policy as part of their process of reviewing, monitoring and assessing the due diligence forms and information they receive in relation to proposed events and other activities, and satisfying themselves of the adequacy of the same.

2.3 Personnel using the Policy should also be familiar with the Charity's other policies. In the event of any discrepancy between this Policy and any other policy, the Trustee Board should be consulted.

2.4 Certain social media posts are made to advertise the Charity's weekly programme of routine religious or educational activities. Simply publicising the existence, date and time of such a routine activity will not need prior approval from the Trustee Board (eg confirming the start of Eid, advertising the date and time of daily prayers or educational classes).

2.5 Any approval requests required under this Policy should be submitted to the lead Trustee as far in advance as possible and Personnel shall give at least 7 days' notice for any approval sought.

2.6 In exceptional circumstances only, a more urgent request may be approved but Personnel shall strive to give at least 2 working days' notice. In cases requesting urgent consent, the request should be accompanied by the reason for the urgency and why more notice could not be provided. Where events have been planned for some time or form part of the annual Islamic and/or Charity calendar, they will not be regarded as urgent and the Personnel ought to engage with the lead Trustee early to ensure effective planning is in place and approval can be obtained in good time.

2.7 In all cases the lead Trustee will endeavour to meet requests for approval as soon as possible. The Personnel recognise that the lead Trustee may seek further information from them prior to or as part of giving approval and should wherever possible incorporate this into their timeframes.

3. DAILY PRAYER, TEBYAN SCHOOL AND ALLAMA TABATABAI SCHOOL PROGRAMMES

3.1 Subject to paragraphs 3.3 and 3.4, any Charity posts or communications which are intended to simply publicise or share logistical information (eg date, timing, location) of the activities of either the Tebyan School or the Allama Tabatabai School may be posted without any further express approval being obtained.

3.2 The details of daily prayer and weekly duas may be published without any further express approval being obtained.

3.3 Where a video is to accompany a post or a publication which is otherwise approved by virtue of paragraph 3.1 or 3.2, details of the video, including where it came from (eg who produced it and appears in it) and when and where it was filmed, should first be provided to the lead Trustee for approval. If this contains images, the consent of the individuals involved must be provided, due diligence must be undertaken on them and the Charity's Data Protection Policy must also be followed.

3.4 If any of the events or occasions mentioned in paragraphs 3.1 and 3.2 are to involve persons who have either not spoken or appeared at the Charity previously with due diligence having been undertaken on them, then the approval of the lead Trustee for those individuals should be sought with accompanying due diligence in accordance with the provisions of this Policy.

4. EVENTS

4.1 Any event which does not form part of the events or occasions mentioned in paragraphs 3.1 and 3.2 should be assessed in order to determine first that they further the charitable purposes of the Charity and may only proceed if it fulfils those purposes. A short description of the event and how it furthers the Charity's objects should therefore be supplied as part of any approval request. This should be proportionate, recognising the nature of the Charity and its work.

4.2 In addition, all approval requests submitted in accordance with paragraph 4.1 should be accompanied by the following information (as presented on the Event Due Diligence Form):

4.2.1 date, time, duration and location of the event;

4.2.2 building capacity and anticipated number of attendees;

4.2.3 staffing and security details;

4.2.4 healthy and safety and any other relevant risk assessment undertaken;

4.2.5 list of proposed speakers and speaker due diligence (set out at paragraph 5);

4.2.6 confirmation of intention to livestream and/or record the event to share afterwards;

4.2.7 details of any event specific matters (eg decorations, gifts, prizes etc);

4.2.8 details of any other parties involved in the event such as external vendors (eg food, photography, police, media etc);

4.2.9 details of any conditions of entry to the event (eg ticketed, open to the public);

4.2.10 copies of any posters, banners, placards etc relating to the event; and

4.2.11 copies of any announcements, press releases etc relating to the event.

4.3 Where an event has been approved, and subject to the Charity's compliance with the Data Protection Policy, it is agreed that photographs taken during the event may be shared/posted to a gallery on the Charity's social media accounts without further express consent being obtained. The Charity shall ensure that all persons involved in an event have been given notice of the filming of the event. No filming of children will be undertaken without the consent of the parents/those with parental responsibility. If the Charity receives a request that a picture or recording is removed, the Charity will arrange for it to be removed.

5. DUE DILIGENCE

5.1 A list will be produced on an annual basis setting out the names of individuals who the Trustees have approved as prospective participants in events held by the Charity. If an individual is not on this list, they may not be asked to participate in an event unless and until Trustee consent to invite the individual has been obtained. The inclusion of an individual's name on this list does not remove the requirement for due diligence to be undertaken in accordance with this Policy.

5.2 Due diligence must be undertaken against all individuals before they can participate in an event (other than as a beneficiary) hosted or organised by the Charity regardless of whether they have taken part in an event previously, but subject to the remaining provisions of this Policy. For the avoidance of doubt, this still applies to individuals who are included in the list referred to in 5.1 above notwithstanding that they have been approved in principle. The Charity should also undertake due diligence on organisations and individuals who hire the Charity's premises to identify any risks they may pose to the Charity.

5.3 The purpose of the due diligence is to identify any risks arising for the Charity. Broadly speaking these risks fall into two categories:

5.3.1 Content risk: these are risks related to **the subject matter** being presented/spoken about/rehearsed. An example of higher risk content is someone's opinion on an event or their personal interpretation of a text or teaching that could potentially incite hatred or be considered extreme; and/or

5.3.2 Person risk: these are risks relating to **the individual themselves**. An example of higher risk individuals are senior political figures, someone who has posted extremist content online content or someone who had committed safeguarding offences.

5.4 Individuals whose participation in an event hosted or organised by the Charity is limited to reciting extracts from the Holy Quran or other religious texts (**Reciters**) should present a lower risk because they are reading standard texts. The due diligence undertaken on Reciters is therefore primarily focused on the person risk only.

5.5 Individuals whose participation in an event hosted or organised by the Charity includes any speech or presentation or discussion that they have written or prepared themselves (i.e. is not limited to reading a standard text) (**Speakers**) present a higher risk because they are sharing personal views and/or variations. The due diligence undertaken on Speakers must therefore fully address and assess both the content and the person risks.

5.6 There may be other categories of individuals engaged by the Charity in an event or activity whose presence or participation in an event or activity may pose a risk to the Charity. For example, this could be a lead volunteer or steward for the event, someone holding a degree of authority or responsibility over the organisation of the event, or a dignitary sharing the stage with the Imam. Due diligence should be undertaken on those individuals, both in terms of: a) Content Risk – what are they required to do/say at the event and does that create a risk; b) Person Risk – who are they and are there any risks arising to the Charity by its association with this person and their being placed in a position of trust and/or responsibility.

5.7 Due diligence, once undertaken on a person or organisation, is valid for 12 months from the date it is approved by the lead Trustee. The Charity will maintain a list of those individuals and any organisations whose due diligence has been approved showing the date on which it was approved and the date the approval expires (**Approved Speakers List**).

5.8 Persons will be subject to lighter touch due diligence (see paragraph 6 below) for so long as they are on the Approved Speakers List unless there has been a change in circumstance pertaining to them (for example, they have become affiliated with another religious centre or have received media scrutiny for their behaviour or conduct) or the event itself requires updated due diligence to be undertaken on them (for example, their participation in the event differs from what they have previously been approved to undertake. A Reciter who has previously recited would need to undergo new due diligence if they have been invited to give a speech as the risk has changed).

5.9 Due diligence should be reviewed and updated, as required, prior to each event or activity at which the individual or organisation will be participating. Confirmation of the due diligence (together with copies of the results of the same) must be provided prior to each event to the lead

Trustee together with notification of any changes or updates relating to the same (see paragraph 6 below).

5.10 The results of the due diligence should be recorded in the Charity's relevant **Due Diligence Form** for assessment. In addition to the relevant specific requirements set out in paragraph 5.11 below, the due diligence must include the following in all cases:

5.10.1 full name and contact details;

5.10.2 confirmation of employer and details of any officer or non-executive roles they hold/any organisation which they represent or to which they are affiliated where this information is available publicly;

5.10.3 evidence of appropriate checks against the individual having been undertaken:

(a) confirmation of the searches performed (eg Google, YouTube, Facebook, LinkedIn, X (formerly Twitter), Instagram etc);

(b) high-level summary of the results of the searches (eg whether any previous talks at other institutions were the subject of media scrutiny);

(c) links to relevant sites (eg screenshot of Facebook page, text of speech previously given);

Note that the relevant Personnel must not only undertake these checks, but must identify any issues arising as a result of the same and report these on the due diligence form and to the Trustees; and

5.10.4 whether the individual themselves are likely to be regarded or have been regarded as controversial (ie they are the subject of intense public argument, disagreement, or disapproval). A reasonable and objective view should be undertaken by the Personnel, even if they do not personally regard the individual as controversial. Where there is likely to be substantial public interest, scrutiny and/or criticism of the event this must be confirmed to the Trustee Board so they can properly consider this potential risk to the Charity, and its reputation, in the approval and planning process. The document entitled Appendix 1 – Risk factors – Reputational Risk (Speakers, Events, Social Media and Comms) should again be used to help make this assessment when reviewing the due diligence results

5.11 Further to the requirements set out in paragraph 5.10 (which apply in all cases), the results of the due diligence must include the following based on the role the person or organisation will perform at the event:

5.11.1 Speakers and those giving any presentation only:

(a) title/topic of the talk and an outline of the content of the same;

(b) their qualification/experience relevant to the topic;

(c) date, time and language of the talk;

(d) if they have spoken at the Charity before, details of the:

(i) date(s) of previous talk(s);

(ii) topic(s) of previous talk(s); and

(iii) any feedback received relating to previous talk(s) (this should be validated by the Personnel receiving the form); and

(e) whether there is a reasonable expectation that the talk could be considered controversial. Personnel should be encouraged to consider this openly and objectively. It is better to report any potential controversy in advance of an event for the Trustee Board to take an informed decision (noting that the fact of controversy in itself, is not necessarily a barrier to a Speaker, but ought to be considered in the planning process so that the Trustee Board can take any necessary steps to mitigate any potential scrutiny arising). The document entitled Appendix 1 – Risk factors – Reputational Risk (Speakers, Events, Social Media and Comms) should be used to help make this assessment when reviewing the due diligence results;

5.11.2 Reciters and those reading from holy scriptures only:

(a) verse of the Quran being recited;

(b) title/section of any other religious text being recited; and

(c) date, time and language of the recitation;

5.11.3 For other persons whom have a particular role or responsibility at the event or activity (section 5.6):

(a) their role in the event or activity and any responsibilities they hold; and

(b) date, time and language of the activity/duration of their involvement.

5.12 In addition, all persons must confirm and declare in writing that they:

5.12.1 have received, read and understood the terms of the Charity's policies on events;

5.12.2 agree to be bound by those terms;

5.12.3 are lawfully able to attend and speak at the Charity;

5.12.4 have disclosed any material facts about themselves which in the Charity's reasonable opinion would or is likely to bring the reputation of the Charity into disrepute; and

5.12.5 accept that any failure to adhere to them may exclude or limit their ability to present at the Charity in future or, indeed, have other knock-on consequences for them or the Charity. If the speaker is an employee of the Charity, any breach of the Policy may result in disciplinary action. For other individuals, the Charity may cease to associate itself with them and require them to no longer associate themselves with the Charity.

5.13 For volunteers, the provisions of the Centre's Volunteer Policy must also be followed.

6. LIGHTER TOUCH CONFIRMATION OF DUE DILIGENCE

6.1 Pursuant to paragraphs 5.8 and 5.9, in certain circumstances a lighter touch due diligence in the form of confirmation of due diligence will be appropriate. Lighter touch due diligence is intended to cover the period from the last date the due diligence was undertaken in order to provide confirmation that there has been no change in circumstances in that time.

6.2 This confirmation must include the following:

6.2.1 event at which the individual last participated at the Charity;

6.2.2 the event or activity in which they will be involved on this occasion. Note that, as per section 5.7, full due diligence may be required if the nature of participation has changed; and

6.2.3 notification of any changes or updates in circumstances and to the due diligence since event in paragraph 6.2.1 took place.

6.3 The results of the lighter touch due diligence should be recorded in the Charity's relevant **Due Diligence Form** for assessment.

6.4 In addition, Personnel should ensure all persons confirm their confirmations and declarations at paragraph 5.11.3 remain valid and binding or that new ones are provided.

7. PERSONNEL AS SPEAKERS

7.1 This paragraph applies to Personnel who speak during events at the Charity on a regular basis as part of fulfilling their role within the Charity. Where Personnel are required to speak during events at the Charity as part of their job description or to discharge their duties in respect of the Charity (eg the Imam, Events Manager) a modified procedure will apply instead of that in paragraph 5 above.

7.2 Personnel must confirm and declare in writing that they:

7.2.1 have received, read and understood the terms of the Charity's policies on events;

7.2.2 agree to be bound by those terms;

7.2.3 have disclosed any material facts about themselves which in the Charity's reasonable opinion would or is likely to bring the reputation of the Charity into disrepute; and

7.2.4 accept that any failure to adhere to them may exclude or limit their ability to present at the Charity in future or, indeed, have other knock-on consequences for them or the Charity. If the Speaker is an employee of the Charity, any breach of the policy will be treated seriously and may result in disciplinary action.

7.3 As with external Speakers, Personnel are encouraged to consider openly and objectively whether there is any reasonable expectation that the subject or content of their talk could be considered controversial (ie they are the subject of intense public argument, disagreement, or disapproval). Any potential controversy should be reported to the Trustee Board in advance of an event so that an informed decision may be made on how best to proceed in the interests of the Charity.

7.4 The Charity should keep a record of any feedback received in relation to talks by Personnel. Any issues arising must be reported to the Trustee Board.

8. EVENT RECORDINGS

8.1 All posts shared from the Charity's social media accounts, whether initially prepared or live streamed by the Charity or by a third party, should further the charitable purposes of the Charity.

8.2 Where the event has been organised by the Charity and all participants have undergone due diligence in accordance with this Policy and the event has been approved in accordance with this Policy, the Charity may livestream or share the recording on its social media channels without any further express approval being obtained.

8.3 Where the Charity wishes to share recordings prepared by a third-party, the due diligence procedures set out in this Policy must first be followed.

8.4 The Charity shall have due regard to its obligations under applicable data protection laws in regards to the length of time a video or similar content will be retained on and available via the Charity's social media accounts and follow its Data Protection Policy.

9. THIRD PARTY EVENTS

9.1 The Charity may hire out its premises to third parties for events. In these circumstances, the Charity must have a record of the third party consenting to abide by the Charity's policies and procedures (including the terms and conditions applying to any hire).

9.2 In addition, before accepting the booking, the Charity must undertake due diligence that is proportionate to the risks associated with the third party event. A separate third party event due diligence form will apply in these circumstances.

9.3 The Charity will keep a record of any and all incidents occurring during a third party event and any feedback received following a third party event.

10. SUPPORTING DOCUMENTS

10.1 This Policy is supported by the following documents:

10.1.1 Due Diligence Flowchart;

10.1.2 Due Diligence Timescale Flowchart;

10.1.3 Approved Speakers List;

10.1.4 DD Event and Speaker Form which is comprised of the following components:

(a) Event Due Diligence Form;

(b) Appendix 1: Event Schedule;

(c) Appendix 2: Marketing Materials; and

(d) Appendix 3:

(i) Speaker Due Diligence Form;

(ii) Reciter Due Diligence Form;

(iii) Persons with Responsibility Due Diligence Form; and

(iv) Confirmation of Due Diligence Update Form;

10.1.5 Hire Application and Terms and Conditions; and

10.1.6 Third Party Event DD Form.

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