

CODE OF PRACTICE ON FREEDOM OF SPEECH AND ACADEMIC FREEDOM

1 Background

- 1.1 This Code of Practice (the “**Code**”) has been prepared in order to ensure compliance with the University’s duties and obligations under the Higher Education (Freedom of Speech) Act 2023.
- 1.2 The Code has been developed in the context of wider legislative and regulatory requirements and the University’s own constitutional and policy framework, including:

Legislation

- 1.2.1 The Education (No 2) Act 1986, section 43, which established the requirement of universities to take reasonably practicable steps to ensure freedom of speech;
- 1.2.2 The Public Order Act 1986, which sets out offences relating to the use of threatening, abusive, or insulting words;
- 1.2.3 The Harassment (Protection from Harassment) Act 1997, which defines the concept of harassment linked to a course of conduct;
- 1.2.4 The Human Rights Act 1998, Article 10, which established the right to freedom of expression within the United Kingdom;
- 1.2.5 The Terrorism Act 2000, which prohibits speech that invites support for a proscribed organisation;
- 1.2.6 The Equality Act 2010, which places duties upon public authorities to prevent discrimination based on protected characteristics and to foster positive relations between communities;
- 1.2.7 The Counter-Terrorism and Security Act 2015, which established a duty on higher education institutions to prevent students from being drawn into extremism; and
- 1.2.8 The Higher Education (Freedom of Speech) Act 2023, which also requires universities to secure and promote the importance of freedom of speech and academic freedom.

Regulatory requirements

- 1.2.9 Office for Students Regulatory Advice 24: Guidance related to freedom of speech, published on 19 June 2025 and updated on 5 August 2026.

University constitutional and policy documents

- 1.2.10 The University’s Royal Charter;

1.2.11 The University's Ordinances and Senate Regulations, and associated policies, including the Student and Academic Policies, and the Validated and Institutional Partnerships Handbook;

1.2.12 The University's Ethics Code; and

1.2.13 The University's Terms and Conditions of Study.

1.3 The Code sets out the University's commitment to freedom of speech, explains the applicable legislation, and outlines the responsibilities of the University community. It includes a Procedure for Events involving Visiting Speakers (at **Appendix 1**).

2 Scope

2.1 This Code of Practice applies to:

2.1.1 all students, staff, and members of the University; and

2.1.2 all visitors, visiting speakers and other persons who have been invited to participate or otherwise are participating in University or Students' Union activities on University or Students' Union premises.

3 Definitions

The following words shall have the following meanings within this Code of Practice and its Appendices:

- **Academic Freedom** is a component of (but a separate term from) Freedom of Speech and, in this Code, is defined by reference to the European Convention on Human Rights and its related case law. It means the intellectual independence and freedom of an academic member of staff at this University, within the law, to question and test received wisdom, and put forward ideas, to express views and opinions, to perform acts, or to associate themselves with any view or acts – even where they may be unorthodox, controversial, or unpopular, or where they may offend, shock, or disturb – provided that expression lies within, or can reasonably be claimed to be a judgement, conclusion, or opinion based on or flowing from their areas of research, professional expertise, or competence.
- The **Code** means this Code of Practice.
- An **Event** means a physical or online or hybrid meeting, event, protest, demonstration, and/or other activity, including but not limited to lectures, classes, and seminars (other than those which form part of an approved academic programme of study at the University), committee meetings, exhibitions, marches, and/or performances hosted at any Premises or taking place in the University's and/or the Students' Union's name. The following shall not be considered Events: (i) lectures, seminars, classes, talks and activities, which form part of an approved academic programme of study at the University; and (ii) meetings and activities which are purely of a social nature.
- **Freedom of Speech** means the freedom to hold opinions and to receive and impart information and ideas without interference, subject only to formalities, conditions, restrictions, and penalties prescribed by law and in the proportionate pursuit of a legitimate aim necessary in a democratic society, including but not limited to the protection of the rights of others.

- A **Member** means any student enrolled at the University, any member of staff of the University, any academic engaged in work on behalf of the University, and any lay member of the University Council or Council committees.
- **Premises** means any property owned by or within the control of the University and/or Students' Union, at the relevant time.
- The **Procedure** means the procedure for approval of Events involving Visiting Speakers set out in **Appendix 1** to this Code.

The **Students' Union** means City St George's Students' Union.

- The **University** means City St George's, University of London.
- The **University's Designated Visiting Speaker Officer** is the Deputy President (Operations).
- **Visiting Speaker** means an individual invited to speak at a University or Students' Union or Bayes Club/Society Event, who is not a Member of the University.
- **Visitor** means a member of the public and/or member of another university who is not a Member of the University.

4 Our Purpose, Mission and Strategy

- 4.1 The University was established by Royal Charter to advance, for the public benefit, education, knowledge and understanding through teaching, research, and engagement, for the benefit of individuals and society at large.
- 4.2 The University regards freedom of speech and academic freedom to be fundamental to its purpose. It considers that to prevent the articulation of certain views or opinions, because they are deemed unacceptable by some groups or even the majority, is to prevent those views or opinions from being fully understood or analysed, and protects those who hold them from having to answer the criticisms of their opponents. The University considers that a failure to uphold this basic principle is to betray one of the critical principles upon which all institutions of learning are founded.
- 4.3 The University's Royal Charter commits the University to:
 - 4.3.1 take reasonably practicable steps to secure freedom of speech within the law for its staff, members, students and visiting speakers;
 - 4.3.2 ensure that academic staff have freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without placing themselves at risk of being adversely affected by losing their jobs or privileges at the University or the likelihood of securing promotion or a different job at the University being reduced; and
 - 4.3.3 ensure the fair and equal treatment of every person, without discrimination on unjustified, irrelevant, or unlawful grounds.
- 4.4 The Council of the University has recognised its duties in respect of freedom of speech and academic freedom, by law and pursuant to the Royal Charter, in Ordinance B.4 and made provision for the preparation, approval, and regular review of this Code.

- 4.5 The University recognises that, at times, the views and ideas of individuals and organisations may be challenging, controversial and, in some cases, regarded as offensive. Such views and ideas may arise in the context of academic research or teaching; and the University will seek to foster an environment in which they may be discussed openly and safely, but also subjected to question and challenge. Such challenging discussion and debate is fundamental to the University's purpose, and therefore the University is fully committed to upholding, securing, and promoting rights of freedom of speech and academic freedom.
- 4.6 Rights of freedom of speech and academic freedom must, however, always be exercised within the law, and the University has legislative duties which require it to ensure that the expressions of views and opinions do not breach the law. In upholding the rights of freedom of speech and academic freedom, the University also commits to taking steps to prevent unlawful speech or actions on its Premises.

5 Legislative and regulatory context

- 5.1 As noted above, the legal framework applicable to higher education institutions incorporates the Education (No 2) Act 1986; the Human Rights Act 1998 (and the European Convention on Human Rights); and the Higher Education (Freedom of Speech) Act 2023.
- 5.2 In addition, the University is required to meet the requirements of the Office for Students ("OfS"), which – through its regulatory framework – requires the University to comply with public interest governance principles (which include freedom of speech and academic freedom); and conditions of registration, which regulate freedom of speech and academic freedom, and relate to public-interest governance (E1) and management and governance (E2). The OfS also publishes regulatory guidance in this area (see [Regulatory Advice 24](#)).
- 5.3 Whilst the University is required to 'take such steps as are reasonably practicable' to secure freedom of speech within the law, this duty must be balanced against other legal requirements on higher education institutions set out in legislation. For example:
- 5.3.1 Speakers who commit a criminal offence in the course of their speech are not protected by their right to freedom of speech.
- 5.3.2 Speakers may not exercise their freedom of expression in a manner which seeks to destroy the rights and freedoms of others under the European Convention on Human Rights (pursuant to Article 17 of the Convention).
- 5.3.3 Speech which constitutes harassment or incitement to hatred or violence (including on the basis of a protected characteristic), or which encourages any form of criminal activity, will also be unlawful.
- 5.3.4 The Equality Act 2010 contains a public sector equality duty which requires the University to have due regard to the need to eliminate discrimination, harassment, and victimisation, and to advance equality of opportunity and foster good relations between people who share protected characteristics and those who do not.
- 5.3.5 The Counter-Terrorism and Security Act 2015 requires higher education institutions to comply with a Prevent duty 'to have due regard to the need to prevent people from being drawn into terrorism'. Speech which encourages support for proscribed organisations will also be unlawful, under the Terrorism Acts 2000 and 2006.
- 5.3.6 The University also has additional legislative duties to maintain public order, and ensure the health and safety of its members, Visiting Speakers, and other Visitors. Other

legislation which may be relevant to whether speech is 'within the law' includes the Malicious Communications Act 1998 and the Communications Act 2003.

- 5.4 In balancing these legislative obligations, the University will remain mindful of the fact that it has a particular responsibility to secure freedom of speech.

6 Steps to secure and promote freedom of speech and academic freedom

- 6.1 The University will seek to foster an environment in which all of its students and staff are able to participate fully in the life of the University and feel able to question and test received wisdom.

- 6.2 The University will ensure that its teaching and research arrangements, its curriculum, and its policies and procedures reflect its duties to secure and promote, so far as is reasonably practicable, freedom of speech and academic freedom within the law.

- 6.3 In particular, the University will ensure that:

6.3.1 its policies and processes for programme development, curriculum design, and approval, quality assurance and academic assessment;

6.3.2 its policies and processes for admissions, appointments, reappointments, and promotions, disciplinary matters, and employment terms;

6.3.3 its policies on equality or equity, diversity and inclusion (including relating to the public sector equality duty);

6.3.4 its IT policies (including acceptable use policies and surveillance of social media);

6.3.5 its policies and processes for facilitating research and research ethics; and

6.3.6 its codes of conduct and other policies relating to behaviour of staff and students (including fitness to practise policies; harassment and bullying policies; and policies relating to the Prevent duty),

respect the rights of freedom of speech and academic freedom and ensure that no individual will be subjected to disciplinary sanction or less favourable treatment by or on behalf of the University because of the lawful exercise of freedom of speech or academic freedom.

- 6.4 The University will not enter into non-disclosure agreements related to complaints about sexual misconduct, bullying, or harassment.

- 6.5 The University will work closely with the Students' Union in relation to matters of freedom of speech, and Events organised by the Students' Union and any affiliated student societies, to which this Code shall also apply.

- 6.6 When members of staff plan to teach or research subject matter or give training that includes potentially controversial viewpoints, steps will be taken to ensure that freedom of speech and academic freedom within the law is protected, and an inclusive environment is maintained, in which staff and students may present and argue in favour of alternative and potentially conflicting opinions. These may include:

6.6.1 identifying controversial subject matter in advance and considering how particular staff/students might be affected and how this might be addressed;

- 6.6.2 outlining, in advance, how challenging topics will be discussed in a way that remains rigorous and respectful, and allows all points of view to be expressed;
 - 6.6.3 providing advance information about controversial content, so that those attending the relevant session may prepare arguments in advance and consider how they might contribute respectfully to debate; and
 - 6.6.4 drawing participants' attention to this Code and discussing its requirements.
- 6.7 The aim in all relevant teaching and research situations shall be to ensure that those with alternative or conflicting viewpoints are able to 'disagree well', providing evidence and rational arguments for the views that they hold, within a respectful environment.
 - 6.8 The University will ensure that this Code is brought to the attention of all new staff and students on induction and at registration, respectively. It will also be annually recirculated to all staff and students and referred to in all appropriate University documentation (including appropriate policies).
 - 6.9 Training will be made available to all relevant staff and decision-makers, and when new policies or procedures are developed and adopted, consideration will be given to their impact on freedom of speech and academic freedom.
 - 6.10 Appropriate steps will be taken to ensure compliance with this Code, including appropriate disciplinary action, if necessary.

7 University and Students' Union Events

- 7.1 An active visiting speaker programme is considered to be a vital part of the University's activities, and staff and students are encouraged to invite a wide range of speakers and to engage with them, critically and courteously.
- 7.2 The President has prescribed the **Procedure in Appendix 1** to this Code to ensure University and Students' Union Events conform to the terms set out in this Code, and has oversight of the operation of this Code and the Procedure, in line with the powers delegated to the President by Council under Ordinance B4.
- 7.3 The Procedure shall particularly apply to any circumstances in which Visiting Speakers are invited to speak at Events on University and/or Students' Union Premises, including at the invitation of the Students' Union and/or its affiliated student societies. The Procedure does not apply to lectures, seminars and tutorials that form part of an academic programme of study at the University or academic research conducted by a Member of the University, which shall be outside the scope of this Procedure, or to events which are purely social occasions.
- 7.4 The Procedure provides the **only** mechanism by which the University can:
 - 7.4.1 cancel; or
 - 7.4.2 impose conditions,
 - on a University and/or Students' Union Event, due to the Event's subject matter and/or the Visiting Speaker's speech and/or opinions.
- 7.5 No use of University Premises and/or Students' Union premises shall be inappropriately denied to any individual or organisation based on any ground connected with their beliefs or viewpoints or their policies or objectives (with the exception of proscribed groups and

organisations). Speakers should, however, expect their opinions to be subjected to debate, critique, and challenge. The starting point will therefore always be that: (i) freedom of speech should be safeguarded and protected; (ii) an Event should proceed; and (iii) cancellation will be exceptional and undesirable.

- 7.6 The University will not prevent a Visiting Speaker from speaking at an Event and will take reasonably practicable steps to safeguard their freedom of speech under this Code, unless it has reasonable grounds to believe that their speech will, or is likely to be, unlawful. The University will carefully assess whether such speech is lawful; what reasonably practicable steps may be taken to protect lawful speech; and/or whether there are restrictions prescribed by law and proportionate under the European Convention on Human Rights, which would mean that restriction or regulation of the speech is appropriate and compatible with the European Convention on Human Rights. It may, by way of example, be reasonable to refuse permission for an Event and/or Visiting Speaker in circumstances where the views likely to be expressed are contrary to the law or the speaker is likely to incite breaches of the law and/or intend breaches of the peace and/or incitement to violence to occur. The University may consider that, in the interests of public safety, the prevention of disorder or crime, the proper functioning of the University, and/or the protection of persons lawfully on its Premises, an Event should not take place.
- 7.7 The University may impose appropriate conditions on any Event ("**Campus Coordination Conditions**"), these being reasonably practicable steps to protect freedom of speech and/or mitigate potential risks which may otherwise prevent an Event from taking place. By way of example, the University reserves its rights in relation to decisions about the admission or exclusion of any persons to/from an Event and in relation to the provision of security. Further details of the University's approach are set out in the **Procedure in Appendix 1**.
- 7.8 The University may, in exceptional circumstances, make it a condition of use of its Premises that either (i) a contribution to the cost of security at an Event is made by the Visiting Speaker or the organisation wishing to participate in the Event, or (ii) the Visiting Speaker or organisation wishing to participate in the Event covers the entire cost of such security. The University will carefully evaluate the costs of providing sufficient security for any Event to ensure that those involved and in attendance are protected from significant harm; and this condition will only be required in circumstances where, for example, the costs are evaluated to be wholly disproportionate to the freedoms being protected and/or the numbers expected to be in attendance. Decisions on such costs will not be influenced in any way by the views expected to be expressed by the Visiting Speaker(s).

8 Breaches and complaints

8.1 In circumstances where:

- 8.1.1 concerns are raised about the exercise of freedom of speech or academic freedom within the law; or
- 8.1.2 concerns are raised about a breach or departure from the requirements of this Code; or
- 8.1.3 the University receives a complaint which includes such concerns,

then the University shall consider which of its regulations, policies, and procedures are most appropriate for the consideration of the complaint and/or concerns raised. This may involve further investigation in accordance with the University's disciplinary, grievance, and/or complaints processes. Such issues, concerns, and/or complaints may be referred to the **Freedom of Speech Referral Group** (see paragraph 9.2 below) for consideration, where they

involve substantive concerns relating to the protection of freedom of speech and academic freedom.

- 8.2 The OfS operates a free speech complaints scheme. Under that scheme, the OfS can review complaints about free speech from non-student members, staff, applicants for academic posts and (actual or invited) visiting speakers. The scheme is free to use. Information about the complaints that the OfS can review is available on its website at: www.officeforstudents.org.uk/for-providers/freedom-of-speech/free-speech-complaints. Student complaints about freedom of speech issues are handled by the Office of the Independent Adjudicator for Higher Education (“OIA”). Information about how the OIA handles such complaints can be found on its website (<https://www.oiahe.org.uk/resources-and-publications/latest-news-and-updates/oia-highlights-role-in-student-free-speech-complaints/>).

9 Advice and guidance

- 9.1 Staff who wish to discuss this Code and its implications should, in the first instance, contact their line manager (who may, if appropriate, refer the issue to the Freedom of Speech Referral Group). Students who wish to discuss this Code should, in the first instance, seek advice from the Students’ Union (who may also, if appropriate, refer the issue to the Freedom of Speech Referral Group). Further information about freedom of speech and the OfS’ approach may also be found here: [Regulatory Advice 24](#). Advice and guidance about the Code and compliance with its requirements may be sought via freedomofspeech@citystgeorges.ac.uk.
- 9.2 The **Freedom of Speech Referral Group** shall consider any issues relating to the interpretation of this Code and the University’s compliance with its legislative and regulatory obligations. The Freedom of Speech Referral Group shall consist of: one Deputy President; one Vice-President; one Executive Dean; and one representative of the Students’ Union; advised by the General Counsel.
- 9.3 Pursuant to Ordinance B.4, the Council of the University has delegated responsibility for the establishment and maintenance of this Code to the President. The Freedom of Speech Referral Group shall also advise the President on the interpretation of this Code and the University’s compliance with it. The Deputy President (Operations) shall be the University’s Designated Visiting Speaker Officer for the purposes of overseeing the Procedure for Events and Visiting Speakers set out in Appendix 1, with advice from the General Counsel.
- 9.4 In line with OfS requirements, the University will organise regular training in relation to this Code, OfS requirements, and the provisions of the applicable legislation, for staff, students, Members, and the Students’ Union. A set of resources will also be developed and made available on the University’s intranet.

10 Monitoring and review

- 10.1 The University will periodically review and, where necessary and appropriate, update this Code of Practice. In accordance with Ordinance B.4 (and applicable data protection legislation), the President (with advice from the Freedom of Speech Referral Group) shall (i) report breaches of the Code and/or (ii) suggest appropriate amendments to the Code, to Council.
- 10.2 The University may also seek and take into account the views of students, staff, and other stakeholders on freedom of speech and academic freedom, and ensuring its protection and promotion, when considering the impact of, and the further development of, this Code.

Appendices:

1. Procedure for Events and Visiting Speakers

2. Visiting Speaker Request Form
3. Designated Officers

APPENDIX 1

Procedure for Events and Visiting Speakers

1 Scope

- 1.1 Capitalised terms used in this Procedure shall have the meanings set out in the Code of Practice. This Procedure applies to all Events hosted at any University and/or Students' Union premises or taking place in the University's name.
- 1.2 This Procedure applies to all members of the University and any other person in attendance at any Event authorised by the University to take place or be hosted at its Premises.
- 1.3 The Procedure also applies to all Events organised in the name of the Students' Union or its affiliated societies or Bayes clubs and societies. This includes activities in external spaces (online or otherwise) and venues hired by or associated with the Students' Union and/or Bayes clubs and societies.
- 1.4 The principles set out in this Procedure include:
 - 1.4.1 the procedure that all Members and all Visitors and Visiting Speakers must follow in relation to Events held at University and/or Students' Union Premises; and
 - 1.4.2 the behaviours expected of any persons attending such Events.
- 1.5 The Procedure does not apply to (i) lectures, seminars and tutorials that form part of an academic programme of study at the University or academic research conducted by a Member of the University; or to (ii) meetings and activities of a purely social nature; both of which shall be outside the scope of this Procedure.
- 1.6 Where there is any ambiguity about whether this Procedure applies the Deputy President (Operations) (as the University's Designated Visiting Speaker Officer) will determine whether such a meeting, event or activity falls within its scope.
- 1.7 Organisers of all activities should assume that they fall within the scope of this Procedure unless otherwise notified.
- 1.8 Infringements of, or any departure from, this Procedure may lead to disciplinary proceedings.

2 Responsibilities of Organisers of Events and Visiting Speakers

- 2.1 University Members and Visitors involved in organising Events (including those with Visiting Speakers) have a responsibility to protect freedom of speech within the law, in accordance with the applicable legislation and this Code.
- 2.2 An organiser ("**Organiser**") of an Event involving a Visiting Speaker at any of the University's or Students' Union's premises or online spaces, or organised in the University's or the Students' Union's or a Bayes club or society's name must:
 - 2.2.1 comply themselves (and ensure any Visiting Speakers comply) with the requirements of this Code and this Procedure;
 - 2.2.2 complete and submit a request form (the "**Visiting Speaker Request Form**" at **Appendix 2** to this Code) to the designated officer (see **Appendix 3**) within the specified timeframe (as set out below); and

- 2.2.3 cooperate with (and ensure any Visiting Speaker(s) cooperate with) any Campus Coordination Conditions the University wishes to put in place in relation to the organisation, publicity, and management of the Event in order to protect freedom of speech, facilitate full debate during which differing views may be respectfully expressed and challenged, and maintain physical and online safety.

It is the Organiser's responsibility to provide full details of the proposed Event, including details of any proposed Visiting Speaker(s), by the specified deadline. Where full details are not provided by the Organiser, approval may not be given. The Students' Union may be the Organiser for the purposes of Students' Union Events.

- 2.3 If an Organiser has grounds to believe that a Visiting Speaker may engage in speech which is unlawful, they must notify the University at the time of seeking approval or as soon as possible thereafter.
- 2.4 Any speaker at an Event may be respectfully questioned or challenged by the audience. Therefore, speakers and Organisers should be receptive to any such challenge and conduct their Event in an orderly manner and environment which allows for respectful challenge and debate.
- 2.5 An Organiser may be required by the University to identify and engage sufficient stewards to assist with orderly conduct at any Event. Names and contact details of the stewards must be made available to the designated officers at least forty-eight (48) hours in advance of the relevant event. Please note that, in particular circumstances, and as a Campus Coordination Condition, it may be necessary to share the names and contact details of stewards with the University's Security and/or Health and Safety teams.
- 2.6 Organisers must ensure that nothing in the preparation for or conduct of their Event infringes the law. For example, any donations/collections of monies at or for an Event (including for charity) must be authorised by the University or the Students' Union before being advertised. Visiting Speakers cannot be advertised via any medium (including online) until the Organiser has received approval.
- 2.7 Organisers are required during Events to:
- 2.7.1 maintain order;
 - 2.7.2 allow respectful debate and the expression of alternative views (including reasonable heckling), but require any person(s) heckling in such a manner as to entirely disrupt the conduct of business and prevent others from being heard to desist from doing so – as protest must not shut down debate; and
 - 2.7.3 ensure that the behaviour of attendees and speakers does not infringe the law.

Where persistent disruptive behaviour prevents debate, Organisers may call the University's Security Team on **020 7040 3333** for assistance.

- 2.8 Organisers may be required, after due consideration by the authorising officer(s), to comply with any Campus Coordination Conditions that the University considers appropriate, in order to protect and secure freedom of speech within the law. By way of example, the following Campus Coordination Conditions may apply:
- 2.8.1 only University Members may be permitted to attend the Event;

- 2.8.2 only University Members and members of other UK universities (upon production of valid proof of identity) may be permitted to attend the Event;
- 2.8.3 Visitors may only be permitted to attend on production of proof of identity;
- 2.8.4 Visitors may not be permitted to attend;
- 2.8.5 admission may be controlled by production of physical or online tickets, identity cards, or both;
- 2.8.6 other admission arrangements may be instituted;
- 2.8.7 a specified number of stewards and/or security staff may be required, who shall be briefed, as appropriate, on their duties and responsibilities, including (by way of example) freedom of speech requirements and local fire and emergency procedures;
- 2.8.8 University staff members may be in attendance to assist in the maintenance of good order;
- 2.8.9 Visiting Speakers and/or other attendees may be required to enter and leave by specified routes and/or be escorted under specified arrangements;
- 2.8.10 Visiting Speakers and/or attendees may be required to use particular online codes or verification links to join or leave online Events;
- 2.8.11 food and/or drink, alcoholic or otherwise, may not be allowed at the Event;
- 2.8.12 items which may lead to injury, damage, or cause a breach of the peace may not be allowed near and/or at the Premises or online during the Event;
- 2.8.13 the admission of representatives of the mass media may be subject to the prior approval of the University or be subject to any appropriate restrictions which may be specified by the University;
- 2.8.14 the Organiser (and others involved in running the Event) may be required to undertake or refresh training in relation to their duty to ensure that those present (including Visiting Speakers) protect freedom of speech within the law and do not breach the law, as well as procedures to be followed in the event of a breach;
- 2.8.15 the University may require the Event to end if an infringement of the law occurs;
- 2.8.16 the Organiser and/or Visiting Speaker(s) may be required to submit any speech to be made at the Event in advance;
- 2.8.17 the Organisers may be required to amend or withdraw any advertisements or notices about the Event and/or restrict the publicity material, including on social media;
- 2.8.18 the Organisers may be required to move the Event to a location, date, and timing set by the University; and/or
- 2.8.19 the Organiser may be required to comply with any other instructions and/or mitigations as may be given about the conduct of the Event and the conditions under which it may be held.

3 Visiting Speaker Approval Process

- 3.1 This Procedure specifically relates to Events involving Visiting Speakers. It should always be applied for Events at or in the name of the University or Students' Union or a Bayes club or society, where there is a risk that the content of any speech might be deemed challenging, controversial, or offensive due to the nature of the Visiting Speakers present or the views which might be expressed.
- 3.2 The Deputy President (Operations) (as the University's Designated Visiting Speaker Officer under this Code and Procedure), on behalf of the University, delegates **initial** consideration of Visiting Speaker requests:
- 3.2.1 for **Students' Union Events**: to the Students' Union;
 - 3.2.2 for **Bayes student club or society Events**: to Bayes Business School; and
 - 3.2.3 for **School-based University Events**: to the relevant School;
 - 3.2.4 for **Professional Services training and/or talks**: to the relevant Professional Service Director; and
 - 3.2.5 for **University-wide Events**, to the University's External Relations team.
- 3.3 **Student Organisers** of Events involving a Visiting Speaker are required to submit a **Visiting Speaker Request Form** (as set out in **Appendix 2**):
- 3.3.1 to the **Students' Union** (for Students' Union Events); or
 - 3.3.2 to **Bayes Business School** (for Bayes student club or society Events).
- 3.4 **Staff Organisers** of Events involving a Visiting Speaker are required to submit a Visiting Speaker Request Form to the relevant School or, if the Event is not affiliated with a School and/or is University-wide, to the University's External Relations team. The University recognises that a rich variety of events, meetings, and activities takes place at the University throughout the academic year. All staff (both academic and professional services) must consider carefully whether approval may be needed, under this Code and Procedure, for any Visiting Speakers attending such events, and should seek guidance, where appropriate.
- 3.5 Organisers must complete the Visiting Speaker Request Form for review by the relevant officer(s) no more than three (3) months and no less than fifteen (15) working days in advance of the proposed Event.
- 3.6 Designated officers with delegated responsibility for initial review (see **Appendix 3**) will undertake their own review process and may refer Visiting Speakers for additional evaluation to the Deputy President (Operations), as the University's Designated Visiting Speaker Officer. Visiting Speakers who are not referred for further evaluation to the Designated Visiting Speaker Officer may be approved. However, **in circumstances where it is considered that the holding of the Event might reasonably be cancelled on the grounds set out at paragraph 7.6 of the Code, then evaluation of the Event must be referred to the Designated Visiting Speaker Officer for further consideration.**
- 3.7 Where Events and/or Visiting Speakers are referred to the University's Designated Visiting Speaker Officer, the relevant request will be considered, with advice from the General Counsel; and the designated officer with delegated responsibility and the Organiser will be informed of the outcome (which may involve permitting the Event to proceed; not permitting the Event to proceed; or permitting the Event to proceed, but with Campus Coordination Conditions).

- 3.8 Receiving officers should process all Visiting Speaker requests within ten (10) working days from the date they are received and should inform Organisers if the review process is likely to take longer. Where a request is referred to the Designated Visiting Speaker Officer, then an additional five (5) working days will be required for review of that request, and the Organiser will be informed if the review is likely to take longer. Any requests submitted less than fifteen (15) working days before the proposed Event may not be processed and approval for the Event may not be given.
- 3.9 Visiting Speakers may not be publicised until the Procedure set out in this Appendix 1 is completed and the University is satisfied that an appropriate review and evaluation has taken place.
- 3.10 The University reserves the right to cancel or prohibit any Event if the processes provided within this Procedure have not been followed and its approval for the Event has not been granted.
- 3.11 Any Organiser who is dissatisfied with the outcome of this Procedure can submit an appeal to the University.

4 Bringing an Appeal

- 4.1 A request for an appeal should be submitted in writing to the University's Designated Visiting Speaker Officer within twenty-one (21) working days of the date on which the University notified the requester of the outcome of their request. An appeal may only be brought on one or more of the following grounds:
- 4.1.1 there has been a procedural irregularity (which may include an allegation of a breach of this Code and Procedure);
 - 4.1.2 there was bias on the part of the decision-maker or decision-making body;
 - 4.1.3 the decision is unreasonable and/or the mitigation is disproportionate; and/or
 - 4.1.4 there is new material evidence which the Organiser can demonstrate was for good reason not previously available.
- 4.2 For the purposes of considering any appeal, the **Freedom of Speech Referral Group** will form an **Appeal Panel**, consisting of one Deputy President (as Chair); one Vice-President; one Executive Dean; and one representative of the Students' Union; advised by the General Counsel. At least one member of staff on the Panel will be a member of Council or Senate. Membership of the Appeal Panel should not include any individual who has previously been involved in determining whether or not the relevant Event may proceed.
- 4.3 It may be necessary to postpone the date of an Event in order for an appeal to be heard. An appeal may take place online, in person, or via correspondence. Where the Chair of the Appeal Panel deems it appropriate, they may invite the appellant to a physical or online meeting to discuss their appeal, on one or more occasions, and they will normally inform the appellant of the purpose of any such meetings in advance; give them reasonable notice of any such meetings; and inform them of their entitlement to be accompanied at such meetings by a staff member or current student of the University, or a member of the Students' Union's advice team.

- 4.4 Where a request for an appeal is received outside the timeframe set out in this Procedure, and no evidence of a good reason for the delay is presented by the Organiser, the University's Designated Visiting Speaker Officer may dismiss the appeal and close the matter.
- 4.5 The relevant Organiser will be informed of the decision of the Appeal Panel within 15 (fifteen) working days of the date of receipt of the appeal. The Appeal Panel's decision about whether an Event can proceed or a Visiting Speaker can speak is final. Any decision to cancel/mitigate an Event, or to reject a Visiting Speaker will be communicated in writing to the relevant Organiser via the Student's Union or relevant School. The University will provide reasons for any cancellation, mitigations, or rejection.
- 4.6 The OfS operates a free speech complaints scheme. Under that scheme, the OfS can review complaints about free speech from non-student members, staff, applicants for academic posts and (actual or invited) visiting speakers. The scheme is free to use. Information about the complaints that the OfS can review is available on its website at: www.officeforstudents.org.uk/for-providers/freedom-of-speech/free-speech-complaints. Student complaints about freedom of speech issues are handled by the Office of the Independent Adjudicator for Higher Education ("OIA"). Information about how the OIA handles such complaints can be found on its website (<https://www.oiahe.org.uk/resources-and-publications/latest-news-and-updates/oia-highlights-role-in-student-free-speech-complaints/>)..
- 4.7 The University complies with the requirements of the UK-retained version of the EU General Data Protection Regulation and the Data Protection Act 2018. Anonymised statistical information relating to the number and type of Events considered as part of this Procedure may be reported to ExCo, the EDI Board, the Prevent and Safeguarding Steering Group, the University Council, and/or the Office for Students. This may include the number of requests for Visiting Speakers escalated for consideration; the number of cancelled Events; the reasons for cancellation; and whether this resulted in any reportable events to the Office for Students.

APPENDIX 2

VISITING SPEAKER REQUEST FORM

Please see the University's Code of Practice on Freedom of Speech and Academic Freedom and the Procedure for Events and Visiting Speakers for guidance when completing this form.

The completed form must be submitted to the relevant officer with delegated responsibility for approval of Events involving Visiting Speakers at least fifteen (15) working days in advance of the Event.

Visiting Speaker Request Form	
Event Organiser details:	
Name:	
Email:	
Phone:	
Staff member or student:	
School, Department or Centre:	
Visiting Speaker(s') details:	
Visiting Speaker(s') name:	
Visiting Speaker(s') contact email:	
Visiting Speaker(s') contact number:	
Company or Organisation:	
Event logistics:	
Title of the Event:	
Date of the Event:	
Start and end time of the Event:	
Event details: <i>(Please provide a short summary of the proposed Event)</i>	
Venue/location for the Event:	
Expected attendees: <i>(e.g. City St George's staff, students, visitors, etc)</i>	
Expected number of attendees:	

Event content details:	
In what capacity is/are the Visiting Speaker(s) attending the Event? (e.g. main speaker, panellist, etc)	
What will the Visiting Speaker(s) be talking about at the Event?	
Are the Visiting Speaker(s) likely to attract high media attention? If YES, please state why.	
Are the Visiting Speaker(s) expected to express views which some may find challenging, controversial, or offensive? If YES, please give details. If any speech may be deemed unlawful, details must be given here. <i>See the Code of Practice on Freedom of Speech and Academic Freedom for further guidance. Please consider whether the University may need to take reasonably practicable steps to protect freedom of speech, in accordance with the Code of Practice or whether there is a need to balance the requirements of other legislation – see in particular paras 5.3-5.4 and 7.6-7.8 of the Code of Practice.</i>	
Please provide at least three relevant websites and/or social media profiles linked to the Visiting Speaker(s).	1. 2. 3.

Approval process:	
As the Event Organiser/Requestor, I confirm that:	
To the best of my knowledge, the above information is free from errors and omissions.	☐
I have read and understood the University's Code of Practice on Freedom of Speech and Academic Freedom and the Procedure for Events and Visiting Speakers.	☐
I believe that the Event/Visiting Speaker requires further consideration by the Designated Visiting Speaker Officer.	☐
I consider that this Event does not require the University to take specific reasonably practicable steps to protect freedom of speech.	☐
Signed:	
Name (print):	
Date:	
As the designated officer with delegated responsibility for approval, I confirm that:	
To the best of my knowledge, the above information is free from errors and omissions.	☐

The risks have been identified, and any appropriate steps have been put in place to ensure that the Event can proceed in accordance with the University's Code of Practice on Freedom of Speech and Academic Freedom and the Procedure for Events and Visiting Speakers.		☐
I have complied with the requirements of the University's Code of Practice on Freedom of Speech and Academic Freedom and the Procedure for Events and Visiting Speakers in considering this application.		☐
I GIVE PERMISSION for the Event to proceed with the above-named Visiting Speaker(s) <i>[subject to any Campus Coordination Conditions]</i> .		☐
<i>[Please detail any required Campus Coordination Conditions.]</i>		
I REFER this application to the University's Designated Visiting Speaker Officer for further consideration.		☐
Signed:		
Name (print):		
Date:		

Internal Office Use Only (where applicable)		
As the University's Designated Visiting Speaker Officer, I confirm that:		
I have considered this request in accordance with the University's Code of Practice on Freedom of Speech and Academic Freedom and the Procedure for Events and Visiting Speakers.		☐
I GIVE PERMISSION for the Event to proceed with the above-named Visiting Speaker(s) <i>[subject to any Campus Coordination Conditions]</i> .		☐
<i>[Please detail any required Campus Coordination Conditions.]</i>		
I DO NOT GIVE PERMISSION for the Event to proceed, for the following reasons: <i>[Please detail reasons for withholding permission.]</i>		☐
I have documented this application and the outcome in the relevant log.		☐
Signed:		
Name (print):		
Date:		

APPENDIX 3

DESIGNATED OFFICERS

UNIVERSITY (SENIOR RESPONSIBLE OFFICER)
The University's Designated Visiting Speaker Officer is the Deputy President (Operations) or nominee.
SCHOOLS
Staff should refer their Visiting Speaker requests to their School's Chief Operating Officer, Senior Director of Operations, or Director of Operations , as applicable (or their nominee).
STUDENTS' UNION
Students' Union Chief Executive (or nominee).
EXTERNAL RELATIONS TEAM
Director of Communications (or nominee).
PROFESSIONAL SERVICES
Staff should refer their Visiting Speaker requests to the Director of the relevant Professional Service (or nominee).