

FREEDOM OF SPEECH CODE OF PRACTICE

1. Introduction and definitions

- 1.1 The University of Greenwich ('the University') is committed to academic freedom and to ensuring freedom of speech within the law for students, staff and visiting speakers, and to ensuring that the use of University premises is not denied to any individual or group on any ground connected with their ideas or opinions, or the policy or objectives of the group or the ideas and opinions of any of its members.
- 1.2 To implement this commitment, this Code of Practice includes the University's arrangements for the booking and conduct of Public Events and events and activities involving External Speakers. However, the scope of the Code of Practice is wider than policies and activities relating to events and speakers, and covers all activities relating to the University's academic life so far as these affect Freedom of Speech or Academic Freedom.
- 1.3 This Code of Practice has been adopted by the University's Governing Body pursuant to the Higher Education (Freedom of Speech) Act 2023 ('the Act') which amends the Higher Education and Research Act 2017. It also reflects other legal requirements on the University, including section 26(1) of the Counter-Terrorism and Security Act 2015 (the 'Prevent Duty') and the government's statutory Prevent Duty guidance.
- 1.4 Capitalised terms used in this Code of Practice have the following meanings:

Academic Freedom: as defined in the Act, the freedom of academic staff of the University 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 the loss of their jobs or privileges, or the likelihood of their securing promotion or different jobs at the University being reduced.

External Speaker: anyone other than a current student or current staff member of the University or GSU, or member of the Governing Body, who may be invited to participate in debate, deliver a speech, preach, expound on a piece of religious text or political viewpoint, and similar activities including anything conducted in the name of the University other than timetabled academic activities. This includes where the External Speaker may be participating in the event by any means of remote access, such as Microsoft Teams or teleconference.

External Speaker Event: any meeting, gathering, conference, broadcast or related activity involving a group of people with an External Speaker, whether held in person or remotely. This does not apply to routine internal University activities related to teaching, research, enterprise or administration (see Other Events and Activities), e.g. the use of a guest lecturer for teaching purposes or an external invitee attending an administrative meeting. Examples of events that would be covered include Public Events with External Speakers (see below), a student group or society inviting an External Speaker to deliver a talk to them, and an External Speaker being invited to address an internal staff or student conference. All University and GSU External Speaker Events held on University or GSU premises or off campus, and online External Speaker Events, are covered by this Code. For the avoidance of doubt, External Speaker Events includes any event with an External Speaker organised by a student group of the GSU on GSU premises or inside the University but outside GSU premises; off-campus External Speaker Events which are funded by the

University or the GSU, affiliated to the University or GSU or branded in any way that associates them with the University or GSU (including student society External Speaker Events held off campus); events where External Speakers are streamed live into the event, or a pre-recorded film of an External Speaker is shown; events with an External Speaker which are held online (e.g. by Microsoft Teams) or mixed online and in person; and events where an external organisation or individual is able to set up a stand and interact with or distribute material to students and/or staff. Due to the higher risks related to Freedom of Speech and the Prevent Duty, External Speaker Events are subject to the approval and booking procedures in section 7 of this Code.

Extremism: <u>defined</u> by the UK government as the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: (1) negate or destroy the fundamental rights and freedoms of others; or (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or (3) intentionally create a permissive environment for others to achieve the results in (1) or (2).

Freedom of Speech: as defined in the Act, the freedom to impart ideas, opinions or information (referred to in Article 10(1) of the European Convention on Human Rights as it has effect for the purposes of the Human Rights Act 1998) by means of speech, writing or images (including in electronic form).

GSU: Greenwich Students' Union.

Other Event and Activity: events and activities relating to the academic life of the University which are not External Speaker Events or Public Events, including events and activities related to teaching, research, enterprise or administration which are organised by staff, GSU and GSU student societies. Other Events and Activities includes those taking place on-campus, off campus, online (e.g. by Microsoft Teams) and mixed online and in person.

Public Event: any event organised by University staff which is open to members of the public from outside the University, whether held in person or remotely. Public Events include events where the speakers are External Speakers and/or where the speakers are current staff members of the University. Public Events include events organised by University staff which are held on University premises, events held offcampus (e.g. using another organisation's facilities), events held online (e.g. by Microsoft Teams) or mixed online and in person. Due to the higher risks related to Freedom of Speech and the Prevent Duty, Public Events are subject to the approval and booking procedures in section 7 of this Code.

Prevent Duty: the duty on the University under section 26(1) of the Counter-Terrorism and Security Act 2015 to have due regard, when carrying out its functions, to the need to prevent people from being drawn in terrorism. When carrying out the Prevent Duty, the University must have particular regard to its duty under the Higher Education (Freedom of Speech) Act 2023 to take steps to secure Freedom of Speech and Academic Freedom.

Responsible Officer: the Vice Chancellor is authorised to appoint a senior officer of the University to act as the Responsible Officer on their behalf to ensure as far as is reasonably practicable that the provisions of this Code of Practice are complied with. Unless otherwise determined the Responsible Officer will be the University Secretary (universitysecretary@greenwich.ac.uk).

Universities at Medway: the collaboration between the University of Greenwich, the University of Kent and Canterbury Christ Church University at the Medway campus.

Venue Hire: where external organisations book University or GSU premises for their events and activities. They are required to comply with the approval and booking procedures in section 7 of this Code to ensure that any risks (e.g. in relation to External Speakers or health and safety) are identified and mitigated as far as possible. However, the University is not responsible for the conduct of external organisations at their events and activities, including conduct which may affect Freedom of Speech. Venue Hire is a commercial activity carried out by the University to raise revenue as non primary purpose trading for the purposes of charity legislation.

Visitor: anyone, other than a current student or current member of staff of the University or GSU or member of the Governing Body, who is invited to attend a University or GSU meeting.

2. Context

- 2.1 The Higher Education (Freedom of Speech) Act 2023 places a duty on the Governing Body of the University to take steps that, having particular regard to the importance of Freedom of Speech, are reasonably practicable for it to take in order to achieve the objective of securing Freedom of Speech within the law for staff and students of the University, Governors and External Speakers. This includes ensuring that the use of University premises is not denied to any individual on grounds connected with their ideas or opinions, or to any group on grounds connected with its policy or objectives or the ideas or opinions of any of its members, and that the terms on which the University's premises are provided are not to any extent based on such grounds. The objective of securing Freedom of Speech within the law includes securing the Academic Freedom of academic staff of the University. These responsibilities are reflected in the University's Articles of Association.
- 2.2 As part of its duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism, the University is required by the government's Prevent Duty guidance to have procedures in place for managing the risks associated with External Speakers. In carrying out the Prevent Duty, the University must have particular regard to its duties relating to Freedom of Speech and Academic Freedom. The Prevent Duty guidance indicates that in most cases, Prevent-related risks can be mitigated without shutting down free speech.
- 2.3 To meet these requirements, the Governing Body has approved this Code of Practice governing External Speaker Events and Other Events and Activities.

3. The University's values relating to freedom of speech and academic freedom

3.1 The University of Greenwich is committed to the pursuit of research and education, engagement with local, national and international communities, and the development of intellectual capacity of the highest standard through rigorous and open academic enquiry. The traditions of Academic Freedom, mutual tolerance and rigorous and fair intellectual debate are held in high regard throughout the University and are fundamental to our mission.

- 3.2 The University's commitment to Academic Freedom and to ensuring Freedom of Speech within the law is embedded in the University's constitution. It reflects our core values as an academic community and specific legal obligations on universities to promote, protect and respect these key freedoms. Freedom of Speech and Academic Freedom include the right to express views which others may find shocking, upsetting or offensive, provided the views expressed are lawful. There is rightly a high level of legal protection for these freedoms.
- 3.3 However, the rights to Academic Freedom and Freedom of Speech are not absolute they are freedoms within the law. Consequently, the law also sets limits on the lawful exercise of these rights. Academic Freedom and Freedom of Speech may not be exercised if in so doing it breaks the law, such as if its expression constitutes unlawful discrimination or harassment or presents a risk to physical safety.
- 3.4 There will be a limited range of circumstances in which an External Speaker Event, a Public Event or Other Event and Activity may be lawfully refused permission to proceed or may have conditions imposed on it by the University. These include:
 - i) A speaker or other persons at the event or activity will incite others to commit criminal acts, including acts of violence and/or the incitement of racial or religious hatred, or will express unlawful speech (including unlawful harassment or discrimination), and no reasonable practicable steps can be taken to reduce these risks:
 - ii) The event or activity appears to be in direct support of an organisation that is unlawful or proscribed¹;
 - iii) The event or activity may cause a breach of the Terrorism Act 2006 or the Counter Terrorism and Security Act 2015 including the encouragement or inducement to, or glorification of the commission, preparation or instigation of acts of terrorism or disseminating terrorist publications;
 - iv) Any aspect of the event or activity involves, condones or may lead to Extremism, and the University, having had particular regard to its duty to take steps to secure Freedom of Speech and Academic Freedom, considers that the risk of people being drawn into terrorism as a result of the extremist views expressed cannot be mitigated to an acceptable level;
 - v) The event or activity is likely to contravene health and safety legislation, or cause a breach of the peace or a public order offence;
 - vi) The event or activity is likely to lead the University to breach other legal obligations;
 - vii) The event or activity will be unlawfully segregated by gender or any other protected characteristic²;
 - viii) Staff, students or other internal or external groups or individuals have misled the University about the nature of the event or activity by falsifying or concealing information:

¹ For proscribed terrorist groups and organisations, see the list published by the UK government.

² The principal exception where gender segregation is permissible under the Equality Act is acts of collective religious worship (e.g. prayer).

- ix) Reasons related to the essential functions of the University. Examples include:
 - a. The application for an External Speaker Event or Public Event has been submitted less than 15 working days before the event and there is insufficient time to review it or put appropriate measures in place (see 7.5);
 - b. Information required about an External Speaker Event or Public Event is missing or incomplete;
 - c. There is no budget allocated for a staff-organised event or activity where costs to the University are involved (e.g. catering);
 - d. A room has not been booked for the event or activity and no suitable room is available:
 - e. If it is thought that the event or activity may attract numbers in excess of the room/lecture theatre capacity;
 - f. A staff-organised event or activity is not a valid use of University resources (including staff time): e.g. because it is not in line with the priorities of the staff member's Faculty/Directorate or with the staff member's plan of work set by their line manager.
- 3.5 Where an event or activity is refused permission under 3.5(ix) for reasons related to the essential functions of the University, it will usually be possible for the event or activity to go ahead (e.g. at a later date) once the issue has been resolved (e.g. the application is resubmitted in appropriate time, missing information is provided, budget is identified, a room is booked etc).
- 3.6 If there are concerns that any of the above circumstances may apply to an External Speaker Event, a Public Event or Other Event and Activity, the event or activity should be referred to the Responsible Officer who will determine whether the event or activity should be permitted to proceed or proceed with conditions in place to address the University's concerns (see 7.13 for conditions relating to External Speaker Events and Public Events).
- 3.7 Our focus will always be on enabling External Speaker Events, Public Events and Other Events and Activities to take place as part of our commitment to Academic Freedom and Freedom of Speech within the law. Permission to conduct an event or activity will only be withheld in the circumstances specified in 3.4, and normally only after attempts to engage with the organisers to resolve issues or put reasonable conditions in place to address the University's concerns have been exhausted. Experience suggests that conditions are not commonly imposed and refusal of permission for reasons related to the content of what will be expressed is extremely rare. Where possible, conditions will relate to 'time, place and manner' (e.g. requiring an event to go ahead at a different time with extra security in place or in a different room) rather than restricting the content of what is being expressed.
- 3.8 Conditions will not be imposed, nor will an event or activity be refused permission to proceed, simply because the views likely to be expressed are controversial, unpopular or are considered by some to be objectionable. The fact that an event or activity may attract protests from those opposed to it is not grounds for refusing permission or imposing conditions, unless one of the circumstances specified in 3.4 in this Code of Practice applies.
- 3.9 Nothing in this Code of Practice requires the University to provide financial support (including releasing staff time) for staff events and activities which do not meet the University's strategic and operational priorities (eg a staff member seeking to organise a research conference which is not in accordance with their faculty's

- research strategy). For provisions relating to security costs for events and activities, see section 8.
- 3.10 Appeal and complaint procedures are in place for event organisers and External Speakers who object to the imposition of conditions or the refusal of permission, or those with other complaints relating to Freedom of Speech and Academic Freedom: see 5.4.
- 3.11 The University does not enter into non-disclosure agreements relating to sexual abuse, sexual harassment or sexual misconduct, bullying or harassment, or other complaints from students or staff. The University is a signatory to Can't Buy My Silence's University Pledge relating to non-disclosure agreements.

4. Authority and jurisdiction of this Code of Practice

- 4.1 This Code of Practice applies to all activities related to the academic life of the University, including External Speaker Events, Public Events and Other Events and Activities. Where there is any conflict between this Code of Practice and other University policies and procedures, this Code of Practice will take precedence.
- 4.2 The provisions of this Code of Practice apply to all members of staff, full and parttime; all registered students; all those associated with the University; External
 Speakers; Visitors; and, insofar as it is relevant, to all those who have an implied
 licence to enter University premises including guests of staff and students, members
 of the public attending a function in the University and those attending conferences,
 short courses or any other properly constituted event, and external parties booking
 the University's or GSU's premises (Venue Hire).
- 4.3 The provisions of this Code apply to all the activities of the GSU and its affiliated Student Groups, including at the Medway campus where GSU operates students' union services on behalf of the Universities at Medway. The GSU has an External Speaker Policy which is subject to and consistent with this Code of Practice, to guide the approval of Student Group events which involve External Speakers by the Chief Executive of the GSU, the Deputy Chief Executive of the GSU or their nominee as 'Approving Officer' (see 7.3). The Policy provides for the escalation of 'high risk' External Speaker Events to the University and its operation is reported to the University's <u>Safeguarding and Compliance Committee</u>. GSU staff involved in the approval of events under the GSU's External Speaker Policy receive appropriate training on their appointment and thereafter as a refresher every two years.
- 4.4 The provisions of this Code apply to all premises and property of the University including accommodation occupied by the GSU, any social and recreational and other areas made over to students, staff associations or trades unions, and accommodation occupied by other organisations under a licence agreement. As indicated, it also extends to events and activities held online, events which are mixed online and in person, and to off campus events.
- 4.5 We will liaise with the other Universities at Medway about 'high risk' events and activities at the Medway campus which may affect them. There are established governance arrangements and lines of communication for liaison between the universities on the joint campus.

5. Procedures to be followed by staff and students

- 5.1 External Speaker Events and Public Events are subject to specific approval and booking procedures in section 7 of this Code. This reflects the higher risks that these events present for Freedom of Speech and the Prevent Duty. Section 7 includes the process for considering and mitigating risks related to External Speaker Events and Public Events by imposing conditions on the event. Venue Hire events are required to follow the procedures in section 7 to ensure that any risks (e.g. in relation to External Speakers or health and safety) are identified and managed, and are also required to comply with the Conference and Events team's booking terms and conditions.
- 5.2 For Other Events and Activities, the normal booking procedures of the University and GSU will apply. E.g. teaching space will be allocated in accordance with the University's <u>Teaching Timetable and Room Booking Policy</u>; staff should book rooms for one-off/ad hoc purposes using the Web Room Booking system on the University's portal. A flow chart summarising the booking process is in Annex 1.
- 5.3 As indicated, the commitments in this Code of Practice apply to all policies and procedures of the University which may affect Freedom of Speech and Academic Freedom, and will take precedence in the event of any conflict. The University will act compatibly with the University's statutory free speech duties when making any decision or adopting any policy that could affect Freedom of Speech.

Appeals and complaints

- 5.4 The University's procedures for appeals and complaints relating to Freedom of Speech and Academic Freedom are summarised below:
 - i) External Speaker Events and Public Events: an expedited procedure for appeals against decisions by the University's Responsible Officer is provided in paras.
 7.18-7.19. This is intended to ensure that appeals will be heard swiftly to enable the event to go ahead if the appeal is upheld. Appeals may be submitted by event organisers or External Speakers.

All other complaints relating to Freedom of Speech and Academic Freedom:

- ii) Complaints from current and former students will be considered under the Student Complaints Procedure.
- iii) Complaints from current staff will be considered under the <u>Staff Grievance Policy</u> and Procedure.
- iv) Complaints from former staff should be submitted to the University Secretary (<u>universitysecretary@greenwich.ac.uk</u>), who will ask the People Directorate to investigate the complaint.
- v) Complaints from job applicants for academic roles who are not staff of the University should be submitted to the University Secretary (<u>universitysecretary@greenwich.ac.uk</u>), who will ask the People Directorate to investigate the complaint.
- vi) Complaints about Greenwich Students' Union should be <u>submitted</u> to the Students' Union.
- 5.5 Unless otherwise specified in the relevant procedure, complaints should be submitted within three months of the event, activity or decision to which the complaint relates.

- 5.6 The Higher Education (Freedom of Speech) Act 2023 provides that the Office for Students (OfS) will operate a free speech complaints scheme. The OfS complaints scheme has not yet come into effect and the government has indicated that it intends to alter the scheme under future legislation so that it will not cover complaints from students. Students who have completed the University's complaints procedures are able to complain to the Office of the Independent Adjudicator for Higher Education (OIA) if their complaint is eligible under the OIA's rules.
- 5.7 Before submitting a complaint to the OfS (when the OfS's scheme comes into effect) or the OIA, individuals should seek to resolve their complaint using the procedures provided in section 5.4.

6. Required conduct

- 6.1 Students and staff of the University must meet the University's expectations regarding acceptable conduct in any events and activities covered by this Code of Practice. Further information regarding what constitutes misconduct is provided in the Student Disciplinary Procedure and the staff Disciplinary Policy and Procedure.
- 6.2 In particular, we expect students, staff, Governors, External Speakers and Visitors to observe following principles:
 - i) Everyone has the right to free speech within the law.
 - ii) Students, staff and Governors should be exposed to a wide range of views within the law, including those that challenge commonly accepted ideas and conventional wisdom. These may include views that some or all might find shocking, disturbing or offensive.
 - iii) If those organising an event invite speakers who they might reasonably have suspected would use their platform to break the law (e.g. because they have done so previously), they may fall foul of the law themselves.
 - iv) Peaceful protest is itself a legitimate expression of freedom of speech. However, protest must not shut down debate.
- 6.3 The University reserves the right to take action against individuals or external groups who violate this Code of Practice, including those who seek to prevent events and activities which comply with this Code of Practice from going ahead. This may include withdrawal of bookings made, with or without refund, and disciplinary proceedings under the appropriate University or GSU disciplinary procedure.
- The University will not condone any actions by any individual or group that seeks to intimidate others or prevent from going ahead a University or GSU event or activity which complies with this Code of Practice. In line with the commitments in its Equality and Diversity Policy Statement, the University will also not condone any event or activity in which individuals are unlawfully segregated by gender or any other protected characteristic.
- 6.5 The University is also committed to ensuring that students and staff organising or participating in events and activities which are permitted under this Code of Practice are not subjected to detrimental treatment as a result of exercising their rights to Freedom of Speech and Academic Freedom.
- 6.6 In the event of actions involving breaches of the law arising under this Code, the University will take the appropriate legal action necessary to maintain good order and will assist the Police and Crown Prosecution Service in implementing the due processes of the law.

7. Approval and booking of External Speaker Events and Public Events

- 7.1 This section sets out the specific procedures which apply to the approval and booking of External Speaker Events and Public Events. The same procedures apply to the Venue Hire events and for purposes of this section, unless otherwise indicated, references to 'External Speaker Event/Public Event' include Venue Hire.
- 7.2 Every person who wishes to hold an External Speaker Event or Public Event must be familiar with this Code of Practice and comply with its provisions. This includes any on-campus, off-campus or online event falling within the scope of this Code of Practice.
- 7.3 Anyone proposing to organise an External Speaker Event or Public Event must first seek approval from an **Approving Officer** who will ensure that a single person is appointed as the **Principal Organiser** of the event. Approving Officers include:
 - i) Student groups and societies: the Chief Executive or Deputy Chief Executive of the GSU (or their nominee(s))
 - ii) Faculty staff: the Faculty PVC and Executive Dean (or their nominee(s));
 - iii) Professional services: the professional service Executive Director (or their nominee(s));
 - iv) Venue Hire: Head of Commercial, Events and Catering (or their nominee(s));
 - v) Vice-Chancellor's Office (VCO) members.
- 7.4 The Principal Organiser is the person responsible for the External Speaker Event or Public Event, for taking all reasonable steps to ensure that the University's property, furnishings and equipment are treated with respect and for any liabilities or consequences arising out of the event. They should normally be present at the event.
- 7.5 The Principal Organiser should give notice of the proposed External Speaker Event or Public Event normally no later than 15 working days before the proposed date whenever possible by completing the relevant application form:
 - Staff seeking approval for an External Speaker Event or Public Event should complete the relevant application form on the University's <u>Freedom of Speech</u> <u>webpage</u>;
 - ii) Student groups and societies seeking approval for an External Speaker Event should complete the application form provided by GSU:
 - iii) Organistions or individuals wishing to book premises for Venue Hire should complete the application form provided by the Conferences and Events team.

The event application form will require the provision of details related to the Principal Organiser, details of the event and details of speakers. The Responsible Officer is responsible for determining the format of event application forms and the information required to be provided.

- 7.6 The University or the GSU may accept requests for approval of events at shorter notice than 15 working days but the University / GSU reserves the right not to approve an event on the grounds of insufficient time to ensure that all necessary arrangements can be made.
- 7.7 External Speakers and Visitors may be subject to web and other security checks as standard practice by the University or GSU.

- 7.8 For student organised External Speaker Events, GSU will require written confirmation from the External Speaker that they have received and accepted this Code of Practice. For staff organised External Speaker Events and Venue Hire, the Principal Organiser should certify that they have briefed the External Speaker on the Code of Practice and provided it to them in hard copy or by a web link.
- 7.9 Where the Approving Officer believes that the External Speaker Event or Public Event may fall within the grounds on which approval of an event may be refused or subject to conditions (as per 3.4 in this Code of Practice), the Approving Officer shall refer the event to the **Responsible Officer** (see section 1) for consideration as to whether permission should be granted, including whether or not it may be necessary to impose any special conditions to mitigate any identified risks of the event taking place.
- 7.10 On receipt of the referral, the Responsible Officer will give a written decision (normally via email) within five working days to the referrer who will forward it immediately to the Principal Organiser. The statement shall either grant or withhold permission for the proposed External Speaker Event.
- 7.11 Permission to hold the External Speaker Event or Public Event may be subject to conditions the Responsible Officer considers reasonably necessary to mitigate risks relating to the event while discharging the University's responsibility to ensure Freedom of Speech and Academic Freedom within the law.
- 7.12 Where there are concerns that an External Speaker Event or Public Event may fall within 3.4 in this Code of Practice, the Responsible Officer may make one of the following decisions:
 - i) To refuse permission for the event;
 - ii) To permit the event to proceed without further restrictions:
 - iii) To permit the event to proceed subject to special conditions designed to reduce the risk to an acceptable level.
- 7.13 Special conditions may include a requirement that:
 - i) The event be recorded by the University or GSU;
 - The event be observed by University or GSU officials, who will have the authority to stop proceedings if the Code of Practice is contravened before or during the event;
 - iii) The event be ticketed, stewarded or subject to security (or extra security);
 - iv) An event promoting a particular view includes an opportunity to debate or challenge that view;
 - v) An independent chairperson is appointed to ensure a range of viewpoints can be heard:
 - vi) A restricted event be opened to others, or an event is restricted;
 - vii) A copy of any speech or any other material to be delivered by an External Speaker is submitted in good time to the University or GSU (with an English translation if necessary);

viii) The event is held at a different location or moved online, or held on a different date/time.

The list of special conditions is not exhaustive and other conditions may be imposed at the discretion of the Responsible Officer.

- 7.14 The University reserves the right to withdraw a booking for an External Speaker Event or Public Event if it receives further information at any time that leads it to believe that this Code of Practice will be infringed or if it believes conditions for the event will not be met.
- 7.15 Where an External Speaker Event or Public Event has been approved to proceed, any proposal to subsequently withdraw permission or impose conditions on the event (including withdrawal of an invitation to an External Speaker) must be referred to the Responsible Officer, who will only withdraw permission or impose conditions if one of the circumstances specified in 3.4 in this Code of Practice applies.
- 7.16 The detailed arrangements for booking of University premises for External Speaker Events, Public Events and Venue Hire are set out in Annex 2.
- 7.17 **Appeals**: appeals against the decisions of the Responsible Officer in relation to External Speaker Events may be made to the Vice-Chancellor or the Vice-Chancellor's nominee (vice-chancellor@greenwich.ac.uk) whose decision shall be final. An appeal may be submitted by the organiser(s) of an External Speaker Event or by an External Speaker. There is no right of appeal against decisions of the Responsible Officer in relation to Venue Hire events.
- 7.18 An appeal must be submitted in writing to the Vice-Chancellor or their nominee within 5 working days of receipt of the Responsible Officer's decision and must be accompanied by any information in support of the appeal. The Vice-Chancellor or the Vice-Chancellor's nominee will normally respond to an appeal within 5 working days of receipt of the appeal. Appeals which are particularly unusual or complex may require a longer timeframe for a response.

8. Criteria for passing on security costs

- 8.1 The Higher Education (Freedom of Speech) Act 2023 requires the University to ensure that, apart from in exceptional circumstances, use of its premises by any individual or body is not on terms that require the individual or body to bear some or all of the costs of security relating to their use of the premises.
- 8.2 The University will not pass on to student groups any security costs associated with events and activities organised by them which are permitted under this Code of Practice, including External Speaker Events.
- 8.3 Faculties and directorates are expected to meet the costs of any events and activities which they organise through the normal University budgeting process.
- 8.4 The University will pass on security costs for Venue Hire to the organistions or individuals booking the University's premises for their own purposes. This is because Venue Hire is a commercial activity carried out as non primary purpose trading to raise revenue for the University, and it would not be a permitted use of the University's charitable resources to subsidise other bodies' security costs.

9. Publication of this Code of Practice

9.1 This Code of Practice will be published on the University's website. The University will bring the Code of Practice and the University's duty to take steps to secure Freedom of Speech and Academic Freedom to the attention of students and staff at least once a year. We will also comply with the OfS's guidance regarding the publication and format of freedom of speech codes of practice.

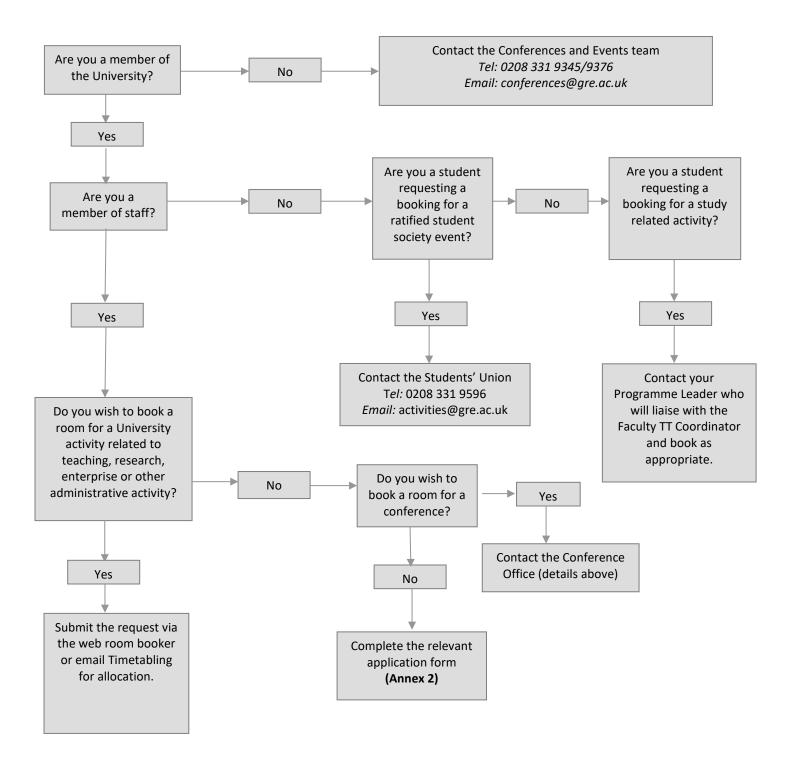
10. Review

10.1 This Code of Practice will be reviewed annually by the University Secretary or earlier if issues arise in the operation of the Code which require substantial reconsideration. Following consideration by the Vice-Chancellor's Executive, any amendments will be referred to the Academic Council and Governing Body for approval.

Approved by the Governing Body: 14 October 2025

Date of next review: October 2026
Document owner: University Secretary

Annex 1: Requesting Space for Non-Teaching Activities/Events



Annex 2: Booking rooms for External Speaker Events, Public Events and Venue Hire

- a) **External Speaker Events and Public Events** for Faculties, Directorates and the GSU, including its Student Groups.
 - i. Staff seeking to organise External Speaker Events or Public Events should seek approval from their Faculty/Directorate by completing the relevant application form on the University's <u>Freedom of Speech webpage</u>. Staff are responsible for booking any room required for the event and should provide details of the room booking on the event application form.
 - ii. Student groups and societies seeking to organise an External Speaker Event should complete the application form provided by GSU. Any room booking requests must be submitted via GSU.
 - iii. Any room booking for an event is conditional on the event being approved by the Faculty/Directorate or GSU (as appropriate) and will be withdrawn if the event is not approved. Staff members are responsible for providing Timetabling with confirmation from their Faculty/Directorate that their event has been approved.
 - iv. Group study rooms in the libraries may be booked by students for individual or group study only and must not be booked for events involving an External Speaker.
 - v. Timetabling may refer a room booking request to the Responsible Officer for further advice if it considers that it does not comply with this Code of Practice.

b) External bookings (Venue Hire) – for all non-University organisations.

- Organisations wishing to hold Venue Hire events on University premises are required to make bookings through the <u>Conferences and Events team</u>.
 Compliance will be required with this Code of Practice and the Conferences and Events team's Booking Terms and Conditions.
- ii. An application form must be submitted with details related to the Principal Organiser, details of the event and details of speakers. No booking will be accepted without this information.
- iii. Where there are concerns about a proposed event, the Conferences and Events team will refer the event application to the Responsible Officer to determine whether the event should be permitted to proceed or have conditions imposed as in para. 7.13 of this Code of Practice.