CITY, UNIVERSITY OF LONDON – CODE OF PRACTICE ON FREEDOM OF SPEECH For meetings or other activities on City premises

Introduction

1. City, University of London is committed to upholding academic freedom of enquiry in its education and research and to ensuring that free and open-minded discussion can take place.

2. Section 43 of the Education (No 2) Act 1986 places a duty on universities to:

   take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of the establishment and for visiting speakers

   and in particular a duty

   to ensure, so far as is reasonably practicable, that the use of any premises of [City] is not denied to any individual or body of persons on any ground connected with—

   (a) the beliefs or views of that individual or of any member of that body; or

   (b) the policy or objectives of that body.

3. The Act further requires that

   The governing body of every such [university] shall, with a view to facilitating the discharge of the duty [set out] above in relation to that [university], issue and keep up to date a code of practice setting out —

   (a) the procedures to be followed by members, students and employees of the establishment in connection with the organisation —

      (i) of meetings which are to be held on premises of the establishment and which fall within any class of meeting specified in the code; and

      (ii) of other activities which are to take place on those premises and which fall within any class of activity so specified; and

   (b) the conduct required of such persons in connection with any such meeting or activity

4. This Code of Practice is issued in fulfilment of that duty, and was approved by the President on 25th March 2015, in line with the powers delegated by Council under Ordinance B4. It replaces all previous versions of the Code of Practice.

5. The President or his delegate will have oversight of the operation of this Code and its periodic review.
Scope and purpose

6. The Code of Practice applies to all staff and students of City, University of London (hereinafter called “members”) and to any other person in attendance at any meeting or other function which has been duly authorised to take place on City, University of London premises.

7. The object of the procedures outlined below, or attached in an annex, is:
   a) To specify arrangements for the management of meetings and other functions on City premises which are not an integral part of normal academic and/or administrative business of City.
   b) To identify reasonably practicable steps that must be taken to ensure that freedom of speech within the law is secured for members of City and for visiting speakers.

8. Accommodation on City premises may be booked by members of City for meetings that form an integral part of City’s normal academic and administrative business, subject to availability and to compliance, where appropriate, with the normal rules and conditions of hiring and to the provisions of this Code of Practice. So far as is reasonably practicable, the use of the premises will not be denied to any individual or body of persons on any ground connected with:
   a) the beliefs or views of that individual or of any member of that body; or
   b) the policy or objectives of that body.

9. Academic activities including use by clubs and societies will take priority over other usage but, at the discretion of the Director of Marketing and Communications, permission may also be given for accommodation to be hired by outside persons or organisations and in some circumstances permission may be given for meetings to be attended by members of the public subject to availability and purposes in accord with City’s Charter.

10. It is essential to the purposes of City that opportunities for free and open discussion within the law should be safeguarded. Members of City and all other persons attending meetings held on the premises must behave in a lawful manner.

11. In the case of meetings or functions that come within the provisions of this Code of Practice (see paragraph 7) and are organised by members of staff, the names of visiting speakers must be approved by City prior to invitation.

12. Visiting speakers at meetings or functions organised by students must come at the invitation of a club or society recognised by City, University of London Students’ Union or the Trustee Board and Committees of City, University of London Students’ Union. Speakers may not be invited by a student or students individually.
Arrangements and procedures

13. The arrangements and procedures below apply to staff and, when stated, to students of City. Annex A contains specific regulations and procedures applicable to students of City. Where different procedures apply for either staff or students, this is noted within this Code of Practice.

14. When a member of staff of City wishes to hold a meeting or function that is not directly related to the University’s usual academic or administrative business on the University’s premises, a written request must be made to the Events Team within the Department of Marketing and Communications. Such requests must be made as far as possible in advance of the projected meeting date, and in any case no less than four weeks in advance, and specify the information set out in paragraph 15 below.

15. In accordance with paragraph 13 above, booking requests made by members of the University staff must be in writing and specify the following information:

a) Date, time and exact place of meeting or function.
b) Name of any speaker(s) or likely alternative speaker(s).
c) Precise timing of expected arrival and departure of any speaker(s).
d) Subject of the meeting or nature of the function.
e) Draft copy of any proposed notice, leaflet or other material announcing or advertising the meeting or function, if requested by the Timetabling team.
f) Name, address, email address and telephone number of a staff member of City or other person responsible for organising the meeting or function; and their status within the organising group.
g) Whether the audience may include persons who are not members of the University.
h) Whether it is intended that the meeting should be open to the public.
i) Details of any circumstances that give rise to concern about possible disturbance which could be caused at the meeting or which might give rise to difficulty in a speaker entering or leaving the premises or being able properly to deliver his or her speech.
j) Arrangements for the chairing of the meeting or function.

16. If the Events team receive a request from a member of City to book a room for an event which appears might not be in connection with official City business, the requestor shall be asked for such information as is reasonably required to establish that the purpose of the booking is to accommodate a bona fide City meeting or function. Bookings will not be confirmed until such information has been obtained.

17. In the case of meetings booked or arranged by a club or society of the Students’ Union (see paragraph 12 above) the Students’ Union shall conduct any investigations and checks in accordance with its own regulations and procedures (included as Annex A), and shall consult the Director of Student & Academic Services where the risk level is moderate or greater. The Students’ Union shall make known to the Director of Student & Academic Services or his/her designated officer the outcomes of those checks and any evidence gathered.

18. Any person making an accommodation booking request who has grounds for believing that a breach of the peace or a criminal offence might occur at a meeting must give notification to the Head of Security of such likelihood at the time of making the booking request or as soon as possible after such likelihood becomes apparent.
Under these circumstances, accommodation bookings may be confirmed only by the Director of Marketing and Communications or an officer authorised to act on his behalf. Where such a booking has been made on behalf of a club or society of the Students’ Union, the appropriate regulations and procedures in relation to external guests and speakers must have been followed for that booking (see Annex A), and the Head of Security and Director of Marketing and Communications reserve the right to refuse the booking if it has not been followed.

19. Any member of staff who receives a request for a booking for a meeting which, in his or her opinion, could give rise to difficulties in ensuring freedom of speech or the safety of a speaker must make a prompt notification to the Director of Marketing and Communications or other designated officer. The notification should give as far as possible the information specified in paragraph 15 above. To the extent that information is not available, details must be sought urgently from the organiser of the proposed meeting or the person submitting the request. It is the responsibility both of those making the booking requests and those receiving booking requests to make appropriate notification as specified above. If there is any doubt about whether a meeting is likely to give rise to difficulties, the Director of Marketing and Communications or other designated officer must be consulted.

20. On receipt at any time of notification that difficulties might arise at a meeting or other function, no further arrangements may be made by the organiser without the express permission in writing of the Director of Marketing and Communications or other designated officer. In particular in such cases if the meeting has not by that time been advertised, no advertisement of, or promotion of, the meeting or function shall be made without appropriate authorisation from City.

21. The Director of Marketing and Communications or other designated officer may require the organisers to amend or withdraw any advertisements or notices and to comply with specified instructions about the conduct of the meeting. A meeting, after due consultation, may be ordered to be cancelled, but this order will be given only in exceptional circumstances.

22. In reaching decisions under this Code of Practice, the Director of Marketing and Communications should consult with the Director of Student and Academic Services, the Director of Property & Facilities and may consult as necessary elsewhere within City, with the Students’ Union, and with external parties as appropriate on a case by case basis.

23. The organisers may be required, after due consultation, to comply with any or any combination of the following conditions if the Director of Marketing and Communications or other designated officer considers that difficulties may be encountered. This provision extends to events organised by clubs and societies of the Students’ Union, which are covered by its regulations on external guests and speakers.

   a) Only members of staff of City and/or registered students of the University may attend.
   b) The public either may, or may not, be invited or admitted.
   c) If guests are to be allowed to attend, only those whose identity is known to the organisers shall be admitted.
   d) Admission shall be restricted and controlled by ticket, identity card or both.
   e) Special arrangements for the checking of admission shall be instituted.
f) Where appropriate a specified number of stewards shall be provided by the
organisers and required to be present throughout the meeting and also whilst
the audience is assembling or dispersing.

g) Where appropriate the names and addresses of stewards (including a chief
steward) shall be supplied in advance by the organisers for approval by
the Head of Security or other designated officer of City.

h) The cost of these stewards or other services shall be met by the organisers.
i) Identified members of City shall be present in order to assist in the
maintenance of good order.
j) Any speaker shall enter and leave by specified routes and shall be escorted
under specified arrangements.
k) No food or drink, alcoholic or otherwise, or any other items which could be
used as/or contain missiles shall be taken into a meeting and City
security staff and/or stewards will be instructed to remove any such
items prior to entry to the meeting or function.
l) No banners, flags, placards or similar items shall be brought into the building
or used anywhere on the premises in circumstances likely to lead to injury or
damage or cause a breach of the peace.
m) The admission of representatives of the press, radio or television shall be
subject to prior approval by the Director of Marketing and Communications or
be subject to any restrictions which may be specified.
n) The Chair and/or organiser shall be made aware of a personal duty to ensure
that no speaker or other person present at a meeting or function should
infringe the law and, if in the opinion of the chair, such conduct continues after
a warning, the chair has a duty to close the meeting.
o) The Chair shall be instructed in advance by the organisers about his or her
duty to decide whether a meeting or function should be terminated, and about
procedures for requesting the police to be summoned in case of breach of the
peace or a criminal act, or threat of either occurrence.
p) Stewards provided by the organisers shall be briefed by the organisers about
their duties and responsibilities including being made familiar with local fire
and emergency procedures.
q) Such other instructions as may be given about the conduct of a meeting or
function or the conditions in which it may be held.
r) The text of the speech should be provided in advance.
s) Provision for a video or audio recording of the event should be made, the cost
of which should be borne by the organisers.

24. Organisers may be required to pay any costs necessarily incurred by the University
to ensure compliance with this Code of Practice or to make good any loss or damage
caused as the direct result of a meeting or function being held.

25. A person or body which has made a request to book accommodation on the
premises, if aggrieved by a decision made in respect of the booking, may make an
appeal to the President. Such an appeal will be heard by the President or his
nominee as soon as is reasonably practicable. The President’s ruling shall be final.

26. In considering appeals the President may seek the advice of a freedom of
speech panel which will normally comprise:

- A Chair of Council, who will chair the panel
- Two members of academic staff, normally to be members of Senate
- Two representatives nominated by the Students’ Union, normally to be the Chief Executive, President or other officer, or trustee
- A Director of Professional Services, or nominee, drawn from Marketing and Communications, Student and Academic Services or Property and Facilities (subject to paragraph 27 below)

and may conduct its business through a face-to-face meeting; through teleconference or video-conference; or by correspondence.

27. Members of the freedom of speech panel for each case should not include individuals who have been involved in determining whether or not an event may proceed before it reaches the appeal stage.

28. The arrangements above apply equally to events organised in non-bookable City premises. In such cases the information set out in paragraph 15 above must be given in writing to the Director of Marketing and Communications or other designated officer with, in addition, details of the space which is to be used for the event.

29. In the case of events organised under the Students’ Unions regulations and procedures for guest speakers, the Students’ Union shall have responsibility for ensuring that the information set out in paragraph 15 above is obtained, and that necessary judgements are made about any additional arrangements, such as those set out in paragraph 23 above. The Students’ Union shall consult as necessary with the Head of Security and in any event the Director of Student & Academic Services or other designated officer may determine the conditions under which such a meeting may proceed. The Students’ Union shall where necessary refer any matters to the Freedom of Speech Panel (see paragraph 26).

30. Infringements of or departures from this Code of Practice in whatever respect by members of the City will render those responsible subject to disciplinary proceedings as laid down by City authorities. Additionally, if any such actions involve breaches of the law, City will be ready to assist the prosecuting authorities to implement the processes of law.

31. Failure by a registered student of City to comply with Section 43 of the Education (No 2) Act 1986 (see paragraphs 2 and 3 above) and with the provisions of this Code will constitute a disciplinary offence.

General Conditions

32. Nothing in this Code of Practice shall detract from the responsibility and duty of a chair or organiser to ensure as far as reasonably practicable that the provisions of Section 43 of the Education (No 2) Act 1986 are complied with.

33. Nothing in this Code of Practice shall prevent the Director of Marketing and Communications or other designated officer from taking such steps as may be necessary at any time to ensure the safety of members of City or other persons, or to safeguard the premises and property of City.

Definitions

34. The term “premises” is deemed to mean all City, University of London property including buildings, grounds, gardens, courtyards and other open spaces including any designated for student use.
35. The term “meeting” is deemed to include any event, activity or gathering of people, formally convened.

36. The term “chair” is deemed to mean the person in the chair at a meeting, or the presiding officer or convenor.

17th March 2015

Annex A: City, University of London Students’ Union External or Guest Speaker Request Form. Please also refer to CULSU Clubs and Societies Regulations for policy on external and guest speakers http://suweb.city.ac.uk/files/culsu-clubs-and-societies-regulations-2014-15.pdf
ANNEX A

Extract from the City Students' Union Clubs and Societies Regulations:

22 EXTERNAL SPEAKERS OR GUESTS

22.1. All Club or Society external speaker or guests requests shall follow CULSU regulations, policies and procedures and be submitted no later than 4 weeks before the date of the event.

22.2. All submissions of requests to invite an external speaker or guest must be fully completed and the data supplied truthful and accurate to the best of the President’s knowledge on the appropriate form. Any form received that does not comply with these regulations shall be automatically rejected.

22.3. A request to invite an external speaker or guest may be rejected on the following grounds:

22.3.1. The event will contravene the External Guest or Speaker Policy and Procedures.

22.3.2. The correct procedure has not been followed.

22.3.3. The individual(s) invited are deemed to be too high risk or the risk cannot be satisfactory mitigated.

22.3.4. The period between the submission date of the form and the event is shorter than 4 weeks.

22.3.5. The Club or Society has not satisfactory provided justification for reasons as to why the external speaker or guest is appropriate for the event.

22.4. The President of the Club or Society shall be held solely responsible for the conduct and behaviour of the external speaker or guest during the event.

22.5. The external speaker or guest shall abide by and adhere to the code of conduct for external speakers and other pertinent City regulations, policies and procedures as well as any relevant legislation.

EXTERNAL GUEST OR SPEAKER REQUEST FORM

This form must be completed in full and be truthful and accurate to the best of your knowledge. Failure to disclose relevant information with regards to the external guest or speakers’ background or inappropriately evaluate the risk of the event and or speaker will result in your application being delayed or rejected.

REQUESTER’S DETAILS

Name: 

Email: 

Phone: 


CLUB OR SOCIETY DETAILS

Name of Club or Society:

Email address:

EXTERNAL GUEST OR SPEAKER DETAILS

Title: Mr ☐ Mrs ☐ Ms ☐ Miss ☐ Dr ☐ Prof ☐ Other (please name)

First Name:

Last Name:

Email:

Phone:

Company or Organisation

Guest\Speaker Affiliations (a member of..)

Please list any known internet sites or accounts held by the External Guest/Speaker (example facebook twitter accounts, Youtube, websites/pages etc)

1.

2.

3.

4.

5.

Has this guest or speaker been granted or refused permission to attend an event at City or another University or Students’ Union before?

YES ☐ NO ☐

At City: Granted Permission ☐ Refused Permission ☐

At another University or Students’ Union: Granted Permission ☐ Refused Permission ☐

If the guest or speaker has previously been refused please state where and the reasons given for the refusal
Why was this particular guest or speaker chosen to attend at your event?

[Blank box]

Do you consider the speaker to be controversial with regards to their reputation, political views, religious views etc?
YES ☐ NO ☐

If YES please give reasons why

[Blank box]

Is the Guest or Speaker likely to attract high media attention? YES ☐ NO ☐

If YES please state why

[Blank box]

**EVENT DETAILS**

Name of the event: [Blank box]

Date of the event: [Click here to enter a date.]

Venue/Location intended for the event: Internal ☐ External ☐

Expected category of attendees: Club or Society Members only ☐ Any City Staff or Student ☐ Other City Staff or Students ☐

Expected number of attendees: 10 – 30 ☐ 31 – 90 ☐ 91 – 130 ☐ 130 + ☐

Please state the topic the Guest or Speaker will be talking about

[Blank box]

**RISK ASSESSMENT**
The President is responsible for undertaking an assessment of the possible risk associated with the attendance of the speaker or with the content of his/her presentation.

A risk assessment is made by giving careful consideration of what might go wrong if this speaker event goes ahead and then calculating the severity and likelihood of these problems arising.

You need to take account of risks in relation to Health and Safety i.e. is there a possibility of anyone being injured and Security i.e. is there a risk of disorder which could put people or property at risk. Clearly these two concerns overlap.

Use the tables below to help you to rate the risk level of your speaker event.

The rating of the risk associated with your speaker or guest will have a bearing on the Students Union’s and/or the University’s decision to approve the speaker.

If your event is assessed as carrying a substantial or extreme risk, then you will be required to work in close collaboration with the CULSU to explore what additional measures could be taken to enable the event to go ahead. In some cases, permission may not be granted.

### HOW TO CALCULATE YOUR RISK ASSESSMENT

<table>
<thead>
<tr>
<th>Risk Level</th>
<th>Rating Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low (1)</td>
<td>The speaker or guest is a known expert in their field and is not known to be controversial, or to hold controversial views. His/her presence on City premises is not likely to be regarded as provocative in any way. The topic of the talk is not controversial nor is it likely to be regarded as offensive by anyone. Access to the event is limited to City students and staff only.</td>
</tr>
<tr>
<td>Acceptable (2)</td>
<td>The speaker or guest may hold a strong position on their topic but this would not be regarded as controversial. The speaker / guest may not have a publicly established reputation in their field. The talk is not likely to be regarded as controversial. It is very unlikely to attract adverse media attention or require staff or security presence. Attendance may be high but the event is open to City students and staff only.</td>
</tr>
<tr>
<td>Moderate (3-4)</td>
<td>The speaker and/or topic may be uncontroversial but the event is open to non-City students and staff, including the general public and high numbers are likely to attend. The topic may be regarded by some as controversial and this could be a cause for concern even if attendance is likely to be low. There may be a need for some security presence. The event is being held at an external venue</td>
</tr>
<tr>
<td>Substantial (6)</td>
<td>The speaker /guest and/or topic are controversial. There may be adverse media attention and a member of SU staff or security should attend. The speaker has been refused permission to speak at another institution before. Attendance at the event will be high and is open to non-City students and staff. The event is being held at an external venue.</td>
</tr>
</tbody>
</table>
The speaker/guest and or topic are highly controversial and will definitely attract adverse media attention. The speaker/guest has been refused permission to attend an event at City and other institutions before. High attendance is expected at the event. The speaker/guest and or topic may attract protest from other students or outside organisations. Non City student and staff are invited to attend. Security presence would be essential.

*The event should not take place unless strict controls are put in place to protect individuals and property.*

<table>
<thead>
<tr>
<th>Severity</th>
<th>Low (1)</th>
<th>Medium (2)</th>
<th>High (3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>LIKELIHOOD</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unlikely (1)</td>
<td>L (1)</td>
<td>L (2)</td>
<td>M (3)</td>
</tr>
<tr>
<td>Likely (2)</td>
<td>L (2)</td>
<td>M (4)</td>
<td>H (6)</td>
</tr>
<tr>
<td>Highly Likely (3)</td>
<td>M (3)</td>
<td>H (6)</td>
<td>H (9)</td>
</tr>
</tbody>
</table>

**RISK LEVEL GUIDELINES**

(Calculation is Severity x likelihood) (1-2) = Low; (3-4) = Medium (6-9) = High

**YOUR RISK ASSESSMENT RATING IS**

LOW ☐ MEDIUM ☐ HIGH ☐

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**FOR OFFICE USE ONLY**

Submission Date: Click here to enter a date.

Time before date of event:

Online Search Results

1. 
2. 
3. 
4. 
5.
Risk Assessment Rating

**MEASURES THAT MAY BE TAKEN**

Form not accepted due to: Incomplete ☐ Risk not correctly assessed ☐ Less than 4 weeks before date of the event ☐ *(FORM MUST BE RETURN TO THE REQUESTER ASAP FOR POSSIBLE RE-SUBMISSION)*

The event can go ahead no additional measures need to be taken ☐

All publicity will need to be approved ☐

Further information is required on the topic from the Club or Society ☐

All attendees will be required to sign in and or show their student card ☐

Closed event - attendees by guest list only NO external guests ☐

All external attendees must register their attendance at least 24 hours in advance and be signed in ☐

Security needs to be informed ☐

Other Student groups need to be informed about the event/speaker/guest/topic ☐

Other (Please state) ☐

Venue/location Confirmed ☐ Where?

_________
Permission Granted by Activities Coordinator YES ☐ NO ☐

Referred to CEO and or VP Activities & Development YES ☐ NO ☐

Approval given by City YES ☐ NO ☐

Risk Assessment Re-Rating

Approval Confirmation Date: Click here to enter a date.

Club or Society Informed Date: Click here to enter a date.

Referral Notes