

## Greenwich Students' Union External Speaker Policy

Greenwich Students' Union operates within the University of Greenwich Code of Practice regarding External Guest Speakers. This is to ensure the students' Union meets the legal requirements as well as ensuring the traditions of academic freedom, mutual tolerance and fair intellectual debate are upheld.

The following process is in place:

1. Student group fill out an event booking form which supplies the information if an External Speaker is part of the event, time and date of booking, topics to be covered and number of students expected to attend.
2. The booking form requires the contact details of the External Guest if they will be in attendance at the proposed event
3. The External Guest is checked through an internet search of the group and the individual including certain key words to ensure a thorough search is completed (previous speeches made at University's/thoughts and comments made via social media/any media coverage of them personally or any affiliated group)
4. The topic of the event provided in the booking form is also checked for relatability to the group making the booking
5. The research is then compared to the risk matrix below by the Societies' Coordinator. This is to be able to indicate if the speaker needs to be escalated and if mitigations are to be put in place
6. The speaker is contacted and to be given the code of practice for events on University campus which written confirmation they have read and understood the code of conduct is requested.
7. If low risk, no other action is required
8. If there is risk, the Students' Union will work with the speaker and committee member to ensure mitigations are in place
9. Research, written confirmation and if needed mitigations are kept recorded via the Students' Union and shared with the University. This is achieved by all searches being saved on the SU External shared drive.
10. Spot checks are completed by Deputy CEO and the Chief Executive
11. An annual report is compiled by the Students' Union and presented at the Safeguarding and Compliance Board on a quarterly basis (as outlined as good practice in the Internal Audit Report)
12. Process is to be reviewed annually

### Non-Student Group or Commercial Events

For non-student group events, the same process will be followed except for:

- The search, speaker contact, and log of findings will be completed by any appropriate member of trained staff

For Commercial events, the same process will be followed except for:

- The search, speaker contact, and log of findings will be completed by any appropriate member of trained staff from the commercial team. The findings will be logged in the shared drive in addition to the external booking contract

RISK	Rating Description – Suggested Guidelines	Potential Actions to Mitigate Risk
Very Low	<p>The speaker has no history of attracting negative media coverage or causing offence. The speaker understands and promotes UK values.</p> <p>The speakers topic is unlikely to cause friction within the student community (for example, an app creator coming to speak on how they made the app)</p>	None required
Low	<p>The topic of the speaker may be mildly controversial, however the speaker has a history of talking on the topic with no issues.</p> <p>Phone conversations are held in a positive manner with a willingness to discuss any issues that may need to be raised.</p>	Students' Union Staff Member/Officer to attend to ensure that topic is adhered to
Medium	<p>The speaker accepts following the external speaker procedure but expresses ideas which may be marginally discordant.</p> <p>The speaker may be affiliated to an organisation which raises concern/may have values which attractive negative media coverage or may make students from particular backgrounds feel uncomfortable</p> <p>Phone conversations with the speaker are conducted in a positive manner with a willingness to discuss any issues that may need to be raised.</p> <p>Confusion between what the student group state the subject of the external speaker's topic is, with what the external speaker believes the topic of conversation is</p>	<ul style="list-style-type: none"> <li>• Time will be set aside for open Q&amp;A sessions</li> <li>• Open the event by publicising it to the entire student community</li> <li>• Actions in low risk section</li> </ul>

<p>High</p>	<p>The speaker has been accused of apologising for acts of violent extremism, proscribed violent/extremist groups or individual connected to violent acts/ extremism.</p> <p>The speaker has been accused of inciting hatred or discrimination against individuals due to identity/ or with a protected characteristic.</p> <p>There are multiple examples of the speaker engaging in vocal and/or active opposition to democracy, the rule of law, individual liberty, and</p>	<p>Entire event recorded on camera</p> <ul style="list-style-type: none"> <li>Invite relevant societies to take part as audience members – To make sure a variety of opinions are heard, senior members of societies/senior officers whose characteristics have been maligned by</li> </ul>
	<p>mutual respect and tolerance of different faiths/beliefs/identities.</p> <p>Voices indignation at being subjected to code of practice compliance and is not concerned with potential affect on others.</p>	<p>the speaker should be invited</p> <p>Require a balancing of the platform – Someone with extreme views should be followed by a speaker who will challenge them</p> <ul style="list-style-type: none"> <li>Actions in low and medium risk section</li> </ul>
<p>Very High</p>	<p>The speaker explicitly criticis UK values, attendance may cause/is already causing an adverse reaction within the student population and/or is receiving high negative media attention.</p> <p>The speaker may have convictions for terrorist offences and/or support a proscribed terrorist organisation.</p> <p>Speaker checks and conversations with the speaker suggests no willingness to apologise for prior offences and refuses to comply with code of practice.</p>	<p>External speaker application refused.</p>

### Reporting Potential Risk

The table above depicts the risk matrix used by staff members when reviewing their findings after conducting a thorough internet search on potential external guests. The categories are broken down and the following actions are taken in relation to each outcome.

**Very Low** – Society coordinator deals with the speaker directly

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**Medium:** Societies Coordinator to flag to Activities Manager once research is completed before contacting speaker. Either Societies Coordinator or Activities Manager to contact speaker, to then report to Deputy CEO and CEO on outcome of decision.

**High:** Societies Coordinator to flag to Activities Manager once research is completed before contacting speaker. Activities Manager to contact speaker, to then consult to Deputy CEO and CEO on decision. CEO/or Deputy to discuss recommendation with relevant university staff (University Secretary and Director of Student and Academic Services) to agree on the most appropriate outcome.

**Very high:** Societies Coordinator to flag to Activities Manager once research is completed before contacting speaker. Activities Manager to contact speaker, to then report to Deputy CEO and CEO on decision of refusal. CEO/or Deputy to discuss recommendation with relevant university staff (University Secretary and Director of Student and Academic Services) to agree on the most appropriate outcome.

# UNIVERSITY OF GREENWICH FREEDOM OF EXPRESSION CODE OF PRACTICE

## Executive summary and definitions

The University of Greenwich is committed to academic freedom and to ensuring freedom of expression and 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 beliefs or views, or their policy or objectives.

To implement this commitment, this Code of Practice sets out the University of Greenwich's ("Greenwich" or the "University") arrangements for the booking and conduct of events and activities involving internal and external speakers, and their associated arrangements.

This Code of Practice is adopted pursuant to the Education (No. 2) Act 1986 and the statutory guidance published pursuant to section 26 (1) of the Counter-Terrorism and Security Act 2015 and the University's duties under the Human Rights Act 1998.

Capitalised terms used in this Code of Practice have the following meanings:

**GSU:** Greenwich Students' Union. This Code of Practice also applies to GK Unions (operated by Kent Union in partnership with GSU) where University of Greenwich or GSU premises are used or booked by GK Unions.

**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 Skype or teleconference.

**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.

**Event:** any meeting, gathering, conference, broadcast or related activity involving a group of people with an external speaker. This does not apply to normal University activities related to teaching, research, enterprise or administrative operational meetings. All University and GSU Events held on University or GSU premises or off campus are covered by this Code. For the avoidance of doubt, Events includes any event organised by a student group of the GSU on GSU premises or inside the University but outside GSU premises; off-campus 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 Greenwich Students' Union (including student society 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; 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. External organisations booking University or GSU rooms for their activities are also required to comply with this Code.

**Extremism:** vocal or active opposition to fundamental societal values, including (but not limited to) democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Version 12.0

External speakers and Visitors may be subject to web and other security checks as standard practice by the University or GSU.

A flowchart summarising the process is available at Annex 1 to this Code of Practice.

## **Introduction**

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.

The University recognises that there are specific legal obligations on universities to promote, protect and respect these key freedoms. However, the rights to academic freedom and freedom of speech and expression are not absolute - they are freedoms within the law. Consequently, the criminal and civil law also sets limits on the lawful exercise of these rights.

Freedom of expression may not be exercised if in so doing it breaks the law or breaches the rights of others, such as if its expression is unlawfully discriminatory or threatens others' safety or freedom of expression. Membership of the University, the GSU and permission to use their premises are predicated upon acceptance of these principles.

The University will not condone any actions by any individual or group that is seeking to support Extremism, intimidate others or prevent from going ahead a University or GSU event 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 in which individuals are unlawfully segregated by gender or any other protected characteristic.

## **Context**

The Education (No. 2) Act 1986 Section 43 (see Annex 2) places a duty on the Governing Body of the University to ensure as far as is reasonably practicable that freedom of speech within the law is secured for students and employees of the University, those associated with the University and for External Speakers. This responsibility is reflected in the University's [Articles of Association](#).

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 also required to have procedures in place for managing the risks associated with external speakers.

To meet these requirements, the Governing Body has endorsed this Code of Practice governing the organisation and running of Events.

To standardise the management of all Events, this Code of Practice sets out booking arrangements and general provisions for their conduct. Detailed operational guidelines, including room booking forms, tariffs and charges for other facilities, are approved by the University or the GSU as appropriate and are to be read in accordance with this Code.

**The University reserves the right to take action against individuals or external groups who violate this Code. This includes withdrawal of bookings made, with or without refund, and disciplinary procedures under the University's rules of conduct governing student and staff behaviour as appropriate.**

### **Authority and Jurisdiction of the Code**

- i) The provisions of this Code of Practice apply to all members of staff, full and part-time; all registered students; all those associated with the University; 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 for events.
- ii) The provisions of this Code apply to all the activities of the GSU and its affiliated Student Groups. 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 by the Chief Executive of the GSU, the Deputy Chief Executive of the GSU or their nominee as 'Approving Officer' (see below). The Policy provides for the escalation of 'high risk' Events to the University and its operation is reported to the University's Safeguarding and Compliance Steering Group.
- iii) 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, off campus Events will also be covered where they 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 Students' Union.
- iv) This Code sets out procedures to include:
  - a) All Events held on University or GSU premises or off campus;
  - b) The conduct required of all persons in connection with those Events;
  - c) Duty of care to and by speakers and those attending Events so that all are able to enter, deliver speeches, listen to speeches and/or participate in events safely without threat to public order;
  - d) Any other related or ancillary matters which the University determines should fall within this Code.
- v) Any infringement of this Code of Practice may render the students and employees responsible liable to disciplinary proceedings as prescribed under University or GSU Disciplinary Regulations.
- vi) 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.

- vii) The Vice Chancellor is authorised to appoint a senior officer of the University to act as the "**Responsible Officer**" on its behalf to ensure as far as is reasonably practicable that students and employees of the University and Visitors comply with the provisions of this Code.
- viii) Unless otherwise determined the "Responsible Officer" will be the University Secretary ([universitysecretary@gre.ac.uk](mailto:universitysecretary@gre.ac.uk)).

## Booking of Events

These provisions apply to any meetings or activities falling within the meaning of "Event" as defined herein.

- i) Every person who wishes to hold an Event whether an officer of an organisation within the University or not, must be familiar with this Code of Practice and comply with its provisions. This includes any on-campus or off-campus event falling within the scope of this Policy (see the definition of 'Events', above).
- ii) Any employee, ratified Student Group, or organisation proposing to organise an Event must first seek approval from an "**Approving Officer**" - the Faculty PVC, Professional Services Director, Chief Executive or Deputy Chief Executive of the GSU or their nominee(s) or a VCO member - who will ensure that a single person is appointed as the "**Principal Organiser**" of the event.
- iii) The Principal Organiser is the person responsible for the 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.
- iv) The Principal Organiser should give notice of the proposed Event and the request to book premises normally no later than 15 working days before the proposed date whenever possible.
- v) The University (or the GSU if the use of GSU premises is involved) may accept bookings at shorter notice but the University / GSU reserves the right not to accept a booking on the grounds of insufficient time to ensure that all necessary arrangements can be made. Any provisional booking requests (where, for example an external speaker has not yet been confirmed) will be held until at the latest 15 working days before the event, pending receipt of the requisite authorisation.
- vi) In all cases, written notice of the proposed Event must be made at the time of submitting the booking request (or, if a provisional booking, by the time the booking is confirmed) and provide the following information:
  - a) the nature of the Event
  - b) the subject /theme of the Event
  - c) numbers of those likely to attend, whether it is internal and limited to Greenwich students and employees or is for external participants only or both.
  - d) the name(s) of the speaker(s)
  - e) contact details for External Speaker(s)
  - f) brief biography of External Speaker(s)



- g) the topics of the speakers
  - h) budget code for internal charging or purchase order if applicable
  - i) risk assessment<sup>1</sup>
- vii) Where the Approving Officer believes that the Event may fall within the grounds on which approval of an event may be refused (as per 5(i) below), the Approving Officer shall refer the Event to the Responsible Officer 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.
- viii) On receipt of the referral, the Responsible Officer will give a written decision (normally via email) within ten 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 Event.
- ix) Permission to hold the Event may be subject to conditions the Responsible Officer considers reasonably necessary to ensure a safe environment and to discharge the University's responsibilities and policies concerning mutual tolerance, intellectual freedom and freedom of expression.
- x) The University reserves the right to withdraw an Event booking, 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.
- xi) The detailed arrangements for booking University premises for Events are set out in Annex 3.

### **Approval of an Event**

- i) An Event may not be approved to proceed if there are reasonable grounds for believing that:
  - a) any aspect of the Event involves, condones or may lead to Extremism, and the risk of people being drawn into terrorism as a result of the extremist views cannot be mitigated to an acceptable level;
  - b) the speaker or other persons at the Event will incite others to commit criminal acts, including acts of violence and/or the incitement of racial or religious hatred or will express unlawful free speech and no reasonable practicable steps can be taken to reduce these risks;
  - c) the Event appears to be in direct support of an organisation that is unlawful or proscribed<sup>2</sup>;
  - d) the Event 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;

- e) the Event is likely to contravene health and safety legislation, or cause a breach of the peace or a public order offence;
  - f) the Event is likely to lead the University to breach other legal obligations;
  - g) the Event will be unlawfully segregated by gender or any other protected characteristic<sup>3</sup>;
  - h) staff, students or other internal or external groups or individuals have misled the University about the nature of the Event by falsifying or concealing information;
  - i) if it is thought that the Event may attract numbers in excess of the room/lecture theatre capacity
- ii) If there are concerns, the Responsible Officer may make one of the following recommendations:
- a) to refuse permission for the Event;
  - b) to permit the Event to proceed without further restrictions;
  - c) to permit the Event to proceed on the basis of regulatory steps designed to reduce risk, and/or with special conditions.
- iii) Special conditions may include a requirement that:
- a) the Event be recorded by the University;
  - b) the Event be observed by University, GSU, or third party officials, who will have the authority to stop proceedings if the Code is contravened before or during the Event;
  - c) the Event be ticketed, stewarded or subject to security (or extra security);
  - d) an Event promoting a particular view includes an opportunity to debate or challenge that view;
  - e) an independent chairperson is appointed to ensure a range of viewpoints can be heard;
  - f) a restricted Event be opened to others, or an Event is restricted;
  - g) a copy of any speech or any other material to be delivered by the speaker is submitted in good time to the University or GSU; or
  - h) trigger warnings be provided prior to certain subjects or material being discussed.

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

## **Appeals**

Appeals against the decisions of the Responsible Officer may be made to the Vice-Chancellor or the Vice-Chancellor's nominee whose decision shall be final. An appeal will only be considered where it is based upon one or more of the following grounds:

- a. Irregularities in the conduct of the relevant procedure, which are of such a nature as to create reasonable doubt whether the Responsible Officer would have reached the same decision had they not occurred.
- b. New evidence which could not have been made available to the Responsible Officer when the referred Event was considered and which can be shown to be material to the case. The appellant must demonstrate valid reasons why such evidence could not have been made known prior to the decision being made. Where the appellant could have made the new evidence available prior to the decision being made, such evidence cannot subsequently be cited as grounds for review.
- c. That the decision reached was perverse in the face of the evidence presented to the Responsible Officer when the Event was considered.

An appeal must be submitted to the Vice-Chancellor within 10 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 10 working days of receipt of the appeal. Appeals which are particularly unusual or complex may require a longer timeframe for a response.

## **Review**

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

**Approved by the Governing Body: 24 February 2020**

**Date of next review: February 2021**

**Document owner: University Secretary**

**Appendix:**

<b>Name</b>	<b>Position</b>	<b>Department</b>	<b>Date last trained</b>	<b>Trainer</b>	<b>Approved to do External Speaker checks</b>
John Schless	Chief Executive	Senior Leadership	N/A - ongoing involvement in policy & procedure		Yes - Approving Officer
Uzma Arif-Fryer	Deputy Chief Executive	Senior Leadership	N/A - ongoing involvement in policy & procedure		Yes - Approving Officer
Onyinye Nkemdirim	Student Activities Manager	Membership/Activities	N/A - ongoing involvement in policy & procedure		Yes - Approving Officer nominee
Dan Lee	Avery Hill Campus Engagement Manager	Membership/Activities	19/11/2020	UAF	Yes - will only provide cover when needed
Kayleigh McNeice	Sports development Coordinator	Membership/Activities	19/11/2020	UAF	Yes - will only provide cover when needed
Lucy White	Societies Development Coordinator	Membership/Activities	02/12/2020	ON	Yes - under supervision and per procedure
Priya Pabla	Academic Communities Coordinator	Membership/Representation	19/11/2020	UAF	Yes - under supervision and per procedure
Mel Miles	Organisation Development Manager	Governance & Finance	19/11/2020	UAF	No - will refer to Activities team as per procedure
Yvonne Howells	Front of House - Admin Assistant	Governance & Finance	19/11/2020	UAF	No - will refer to Activities team as per procedure
Lucy Manley	Front of House - Office Assistant	Governance & Finance	19/11/2020	UAF	No - will refer to Activities team as per procedure

**Note:** external speaker checks will always be done by SLT or selected members of the Activities team. When the checks are done and if the booking is approved to go ahead, it will be referred back to the staff member originally handling the booking (e.g. Priya for a part-time officer event) for them to complete the booking. Records will be kept of all checks by the SU staff undertaking the checks and saved on the shared drive. In practice Onyinye will handle any checks not 100% certain to go ahead and refer to the Responsible Officer, and Uzma will cover if Onyinye is away.