



LONDON
COLLEGE OF
INTERNATIONAL
BUSINESS
STUDIES



Freedom of Speech & Expression Policy

Including visiting speakers and events for staff and students

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Freedom of Speech and Expression Policy

(Including Visiting Speakers and Events for staff and students)

The College has a responsibility under the Education Reform Act 1988 (202, 2(a)) to ensure Freedom of speech for those within the College and this is taken into account through the following policy.

1.0 Purpose

1.1 The aims of this policy is to specify LCIBS' procedures to safeguarding freedom of speech and upholding the principle of freedom of speech. This policy takes account of the following legislation and/or regulatory guidance

- Education (No 2) Act 1986
- Education Reform Act 1988
- Equality Act 2010
- Counter Terrorism and Security Act 2015
- HM Government: The Prevent Duty Guidance: for higher education institutions in England and Wales

Following the procedures set out within this Policy will ensure

- that the College is aware of who is speaking and of the views that are being promoted within LCIBS.
- that the rights and responsibilities within the Equality Act 2010, and the Prevent Duty 2015 are adhered to.

2.0 Scope

2.1 Definitions for the policy

'Guest speaker' means a person invited to speak at the College or an event held at the College, this can include panel members for debate.

2.2 What the policy covers?

- 1.1 Requirements to ensure that freedom of speech is enabled for all employees and Governors of the College. It also extends to visitors and volunteers at the college.
- 1.2 Requirements for holding meetings and events at the College. Outdoor as well as indoor meetings and events on College premises are included.
- 1.3 This policy applies to all members, students, employees and the Governors of the College, in respect of all College premises. Outdoor as well as indoor meetings and other events on College premises are included. It also extends to visitors and volunteers at the College.

3.0 Policy Statement

3.1 Freedom of Speech and Expression

- 3.1.1 London College of International Business Studies (LCIBS) is committed to the fundamental rights of freedom of speech and expression, so far as that is reasonably practical within the realms of the law.
- 3.1.2 Freedom of speech is protected by the college as part of its commitment to teaching, learning and research. As required under the Education (No 2) Act 1986, section 43, the college has adopted this policy which binds all employees, students and visitors of LCIBS to tolerate and safeguard all expression of opinions within the law, whether or not they agree with those opinions.
- 3.1.3 All members of London College of International Business Studies (hereafter referred to as 'the College') should conduct themselves in a fashion that ensures freedom of speech within the law is secured for all staff, students, and visitors. The College believes that a culture of open discussion and debate can only be achieved through avoidance of provocative and offensive actions and language.
- 3.1.4 The College expects all of its members to be respectful of the diversity of the community and to both be aware of and respect the overarching College values set out in the Equality and Diversity Policy. Any event that may create an environment whereby people will experience, or could reasonably fear, harassment, intimidation, verbal abuse or violence, particularly because of their ethnicity, race, nationality, religion or belief, sexual orientation, gender, disability or age, is also likely to be unlawful and would not be tolerated.
- 3.1.5 The College has a due regard to the need to prevent people from being drawn into terrorism in line with the Counter-terrorism and Security Act 2015. This due regard is taken into account in relation to freedom of speech and there will be a proportionate response through an application process and resulting risk assessment.
- 3.1.6 The College will ensure the use of College premises is not denied on grounds connected with the beliefs, views, policies or objectives of an individual or body of as such use is within the law at all times. All events/meetings/activities taking place on College premises are private, unless the public is expressly invited to attend
- 3.1.7 Employees, students, visitors and external groups wishing to hold events in the College's facilities are required to use the policy procedures set out in section 4.0. This includes one-off events and block booking of facilities.
- 3.1.9 Advice on any aspect of this policy can be gained from the Student Services Lead.

4.0 Process and procedures

4.1 Responsibility

4.1.1 The overall responsibility for issues regarding freedom of speech lies with the Head of Quality and Registry, though day to day management shall be provided by the Provost, the Dean and the Head Student Services.

4.2 Organising an event

4.2.1 All events, whether on campus or a branded or affiliated event off campus are covered by this policy. A similar assessment of an external event will take place in line with the Prevent duty.

4.2.2 An 'event' is any meeting, gathering or similar activity involving a group of people. This definition does not cover the normal business operations of the College (teaching sessions and operational meetings) unless outside speakers are involved. The term 'outside speaker' does not include associate lecturers but does include guest lecturers.

4.2.3 Guest lecturers who contribute repeatedly to College programmes will only be required to undergo an abbreviated approval process through the Head of Academic Department on the first occasion of attendance at the College. The Head of Academic Department is to ensure that guest lecturers are updated on Prevent requirements on an annual basis.

4.2.4 Where an event is to be organised that falls outside of the scope of teaching within the qualification provided by the College, the Event Booking Form found in Appendix 1 should be completed at least 14 days prior to the proposed event date. If an event is booked by a member of the Academic Staff, a 'light touch' approach will be taken, in which their line manager will be the approver, provided no issues are found. In the case of any issues, the usual referral route will be taken as detailed below.

4.2.5 Where an application is made later than the 14-day cut off, the event cannot go ahead on the proposed date. There must be sufficient time to assess the event and put any conditions into place regarding this.

4.2.6 If the event involves a potential audience or gathering of equal to or more than 50 people, 28 days' notice should be provided.

4.2.7 In the first instance, an Academic representative and the Student Services Lead will assess and research the event or speaker through at least three pages of Google searches in line with the guidance provided by the government. If it is deemed acceptable in regard to content and does not violate any of the guidelines provided in Appendix 1, it may go ahead.

4.2.8 If in the first instance the event is deemed to be in possible breach of the guidelines provided in Appendix 2, a meeting will be called involving the Dean, the Head of Quality and Registry, an Academic Representative, and the Head of Student Services.

4.2.9 It may be deemed necessary to contact external agencies to gain further information on the providers of the event; this may include but is not limited to, the Prevent co-ordinator, the Local Authority, and the Police.

4.2.10 The College reserves the right to deny a platform to racist and fascist individuals and groups, as they would fall foul of points 3.1.2 and 3.1.4.

4.3 Offensive and controversial communications (literature, banners and notices)

4.3.1 The College has the right to take steps it considers as necessary, including removal and/or confiscating any banners, literature or other notices, that in the opinion of the College are unlawful or go beyond the expression of points of view and opinion as upheld by this policy.

4.4 Right to object to an event

4.4.1 Any individual has the right to raise an objection to the College in respect of the holding of an event. The Head of Quality and Registry may take steps as s/he considers necessary in response to the objection, which may result in the event being postponed, relocated or the cancellation the event.

5.0 Relevant Legislation and Policies:

5.1 This policy should be read in conjunction with the following legislation:

- Communications Act 2003
- Terrorism Act 2000
- Public Order 1986
- Equality Act 2010
- In addition, the following policies:
- Equality and Diversity
- Prevent Policy
- Safeguarding Children and Vulnerable Adults

Appendix 1: Guidance on misconduct in relation to Freedom of Speech

This appendix is for indicative purposes only and does not constitute a definitive list of behaviours that may constitute misconduct. This guidance also applies to visiting speakers or organisations involved in events on College grounds.

- Disruption of, or interference with, the activities of the College;
- Violent, indecent, disorderly, threatening or offensive behaviour or language whilst engaged in any College activity and on any College site;
- Harassment or discrimination against any student, staff member, or authorised visitor to the College at any time;
- Damage to, or defacement of, any College property,
- Placing posters without prior authorisation, or posters that could be constituted to be in violation of the above policy by creating an environment of harassment or whereby people will experience, or could reasonably fear, harassment, intimidation, verbal abuse or violence, particularly because of their ethnicity, race, nationality, religion or belief, sexual orientation, gender, disability or age;
- Conduct which constitutes a criminal offence, including those that damage the reputation of the College;
- Behaviour that brings the College into disrepute,
- Failure to disclose information to any employee dealing with the event / speaker when requested to do so in line with the above policy.

The following are some examples of behaviour that would be relevant to the College's due regard in relation to the Prevent guidance. Again, this list is not definitive and is for indicative purposes only. The Prevent policy should be referenced in line with the below.

- Distribution of discriminatory, threatening, obscene or insulting leaflets or literature either physically or via email or other internet-based distribution,
- Speech or literature explicitly supporting terrorism or inciting violence, including assassination,
- Acts intended or likely to stir up hatred on grounds of race, religion or sexual orientation.

Appendix 2: Events / External Speakers Booking Form

Event / External Speaker Booking Form

Please fill in ALL of this form and hand it to Student Services AT LEAST 14 days before your proposed event date.

Name of Organiser (You)	
Contact Email of Organiser (Yours)	
Contact Phone of Organiser (Yours)	
Title of Event	
Speaker Name	
Theme / Objectives of Event	
Speaker/Organisation Email	
Speaker/Organisation Phone	
Proposed Date of Event	
Proposed Start and End Time of Event	-
Proposed Location of Event	
Anticipated Numbers of Attendees	
Will it be a ticketed event?	
Will the event be filmed?	
Are the press invited?	
What publicising will you do? (Posters, emails, social media etc)	
Are you / the organisation / the speaker, selling or distributing anything?	
Do you know of any grounds that may indicate that this event will impact the reputation of the College?	
Will there be children (under 18's) on site?	
Will there be anyone with a disability on site that we should make access arrangements for?	
Any other relevant information?	

SIGN AND DATE BELOW:

FOR OFFICE USE ONLY:

Date Form Received:

Proposed Event Date:

Any concerns post-research?

Need to refer for further assessment? YES / NO

If YES, book meeting with Dean, Head of Quality and Registry, Prevent and Safeguarding Lead, and an Academic Representative. Inform event organiser within 3 days.

If no need for further assessment, sign, print, and date below:

/ /

Appendix 3: Process and Procedure for an Event / External Speaker booking, including Referrals

Section 1: Process for booking an event or external speaker

The following is the process followed for the booking of an event or external speaker.

1. Organiser fills in form found in Appendix 2 (located in the Student Services Office), and hands to Student Services at least 14 days before the proposed event (28 for bookings with over 50 attendees).
2. Head of Student Services and an Academic Representative produce a research document of at least the first three pages of Google searches in order to ascertain whether the event can go ahead.
3. The event is deemed acceptable to go ahead and the organiser is informed the same day the decision is reached. If there are conditions such as ticketing, security, or a speaker with an opposing view for balance, these will be passed along and must be adhered to in order for the event to go ahead.

Section 2: Referral process

If there is a need for a referral, the below process is used:

1. Stages 1 and 2 from the above (Section 1) are followed.
2. During the search it is found that the event may be in breach of the attached policy using the framework mentioned in Appendix 1.
3. A meeting is called between the Dean, the Head of Quality and Registry, an Academic Representative, and the Head of Student Services and the organiser is informed within 3 days.
4. Prior to this meeting, external agencies may be contacted to gain more information regarding the speaker or organisation, and this will be discussed at the meeting.
5. Either the event is deemed acceptable to go ahead under a number of strict conditions with a member of the previously mentioned meeting present. This individual will have the power to shut the event down if they feel it is in breach of the conditions or the law.
6. The event may not be deemed acceptable to go ahead and this will be communicated within 5 working days to the organiser. The College is not liable for anything booked in advance without prior authorisation.