Code of Practice on Freedom of Speech

The University of Law

LCCA London College of Contemporary Arts

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1. INTRODUCTION

1.1. Section 43 of the Education (No. 2) Act 1986 and the Higher Education (Freedom of Speech) Act 2023 requires universities and colleges and all concerned in their governance to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for its members, students and employees and for visiting speakers.

1.2. The University of Law including any subsidiary (the "University") values diversity and is committed to the principles of academic freedom and freedom of speech and expression, as codified in the Higher Education (Freedom of Speech) Act 2023.

1.3. This Code of Practice sets out the rights and obligations inherent in supporting the principles of freedom of speech and academic freedom within the law and the procedure to be followed by students and staff in connection with the organisation of events and meetings which fall under this Code of Practice.

2. SCOPE

2.1. **This Code of Practice applies to:**

a) Staff, students and members (including but not limited to members of the board of directors and holders of honorary doctorates) of the University; and

b) visiting speakers and all other persons invited or otherwise lawfully on the University's premises.

2.2. References in this Code of Practice to the "University's premises" means those premises and platforms over which the University exercises control (including online or virtual classrooms and communication spaces).

2.3. The Code of Practice also applies to events, activities and meetings hosted by or on behalf of the University on non-University premises, online platforms and social media platforms.

2.4. This Code of Practice will be posted on the University's intranet and website and should be read in conjunction with the following policies and regulations:

- Prevent Duty
- Security Policy;
- Data Protection Policy;
- Equality Diversity and Inclusion Policy;
- Staff and Student IT Acceptable Use Policies;
- Staff and Student Codes of Behaviour;
- Student Disciplinary Policy and Regulations
- Employability Service Protocol: Outside Speakers and Employer Events;
- Staff and Student Voicing Concerns Policies; and
- Dignity at Work and Study Policy.
- Research Regulations
- Poster and Leaflet Protocol
- Student Social Media Policy
- Online Etiquette Policy
- Student Sexual Misconduct Policy

3. KEY CONCEPTS

3.1. Freedom of speech means that everyone has the right to express lawful views and opinions freely, in speech or in writing, without interference.

3.2. Freedom of speech within the law is protected. This means that speech will not be protected if is in contravention of another law and illegal or unlawful acts will not be tolerated by the University.

3.3. The University has a duty to protect its staff and students from unlawful discrimination, harassment, intimidation or threats of violence on the grounds of race, sex, age, religion or philosophical belief, sexual orientation, disability, gender reassignment, marriage and civil partnership, or pregnancy or maternity. However, the provisions of the Equality Act 2010 should not be interpreted to undermine freedom of speech and academic freedom. As a result, students' learning experience and the working environment of staff may include exposure to research, course material, discussion or speaker's views that they find offensive, contentious or unacceptable, but are nonetheless within the law, and unlikely to be considered unlawful harassment or discrimination under the Equality Act 2010.

3.4. Academic freedom means freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions without being at risk of being adversely affected. An individual would be deemed to have been adversely affected if they had either lost their job or privileges at the University or experiences a reduction in the likelihood that they would secure a promotion or different job at the University.

3.5. The University is committed to ensuring that academic staff [and students] have the freedom to question and test received wisdom and put forward new ideas and opinions without placing them at risk of using their job, privileges or future opportunities. Academic freedom shall extend to all students, academic staff and to any visiting or guest lecturer invited by the University.

4. VALUES

4.1. The University embraces diversity of experience and background and is deeply committed to delivering outstanding academic experiences and outcomes. The University recognises, supports and promotes freedom of speech and academic freedom, within the law, as a fundamental principle of a democratic society and one that is central to higher education. These freedoms are intrinsic to a fulfilling higher education experience, and the University is committed to providing an environment where differing views, opinions and beliefs can be exchanged.

4.2. The University will promote and support the principle of freedom of speech and academic freedom even where the ideas and views expressed may be unpopular. However, nothing in the University's commitment to freedom of speech is an excuse for abuse, bullying, discrimination, harassment, hatred, intimidation, violence or any act prohibited by law. The University's processes relating to Dignity at Work and Study, and our Disciplinary processes and regulations are in place to manage reports and disclosures where individuals feel they have been discriminated, harassed or impacted by behaviour which does not fall within the scope of freedom of speech.

5. STEPS THE UNIVERSITY TAKES TO ENSURE FREEDOM OF SPEECH

5.1. The University will ensure that its teaching, curriculum, all educational practice, policies and procedures reflect its duties to ensure, so far as is reasonably practicable, freedom of speech and academic freedom within the law. In particular:

a) its processes for programme development and approval, quality assurance and academic assessment will respect the rights of freedom of speech and academic freedom;

b) its processes for facilitating research will respect the rights of freedom of speech and academic freedom; and

5.2. no individual will be subjected to disciplinary action or other less favourable treatment by or on behalf of the University because of the lawful exercise of freedom of speech or academic freedom. The University is aware that the terms of certain overseas funding, including funding from endowments, gifts, donations, research grants and contracts, and educational or commercial partnerships, from any overseas country, may present a risk to freedom of speech and academic freedom. Therefore, the University has processes in place to ensure that risks to freedom of speech or academic freedom are identified and appropriately managed.

5.3. The University shall also:

a) ensure that this Code of Practice is brought to the attention of new students at induction and enrolment and new staff during induction, and all individuals affiliated with the University;

b) ensure that all staff have access to information and a named University lead on freedom of speech and academic freedom;

c) periodically survey staff, students and other stakeholders to secure their views on whether freedom of speech and academic freedom at the institution are being adequately protected and take the findings into account;

d) ensure that there are adequate measures in place to raise concerns about freedom of speech and academic freedom;

e) recommend that when new policies and procedures are introduced consideration is given to their impact on freedom of speech and academic freedom through robust Equality Impact Assessments; and

f) monitor any concerns that have been raised about freedom of speech and academic freedom to ensure that they are addressed so far as is reasonably practical and that any lessons learned are incorporated into a review of relevant policies practices and procedures.

6. EVENTS AND MEETINGS

6.1. Where any individual or body subject to the obligations of this Code of Practice wishes to hold an event, meeting or other activity for the expression of any views or beliefs held or lawfully expressed on University premises and online platforms, consent shall not be unreasonably refused. Any conditions imposed on the holding of the meeting shall be kept to the minimum necessary in light of any risks identified in holding the meeting.

6.2. It shall be reasonable to refuse consent where the University reasonably believes (from the nature of the speaker or from similar activities in the past whether held at the University or otherwise) that:

a) the views likely to be expressed by any speaker are contrary to the law;

b) the intention of any speaker is likely to be to incite breaches of the law or to intend breaches of the peace to occur;

c) the meeting will include or is likely to include the denial of the right to hold or to express an opposing opinion;

d) the speaker and/or the organisation they represent advocates or engages in violence or non-violent extremism in the furtherance of their political, religious, philosophical or other beliefs;

e) the views likely to be expressed by any speaker are for the promotion of any illegal organisation or purpose, including organisations listed on the government's list of proscribed terrorist groups or organisations; or

f) it is in the interest of public safety, the prevention of disorder or crime or the protection of those persons lawfully on premises under the control of the University, that the meeting does not take place.

6.3. Where the University is reasonably satisfied that the otherwise lawful expression of views at an event or meeting on University premises is likely to give rise to disorder or threats to the safety of participants or the wider University community, the University shall consider which proportional steps are necessary to take to ensure the safety of all persons and the security of the premises controlled by the University. These may include, but are not limited to: requirements as to the provision of security/ stewards, the speaker being part of a panel or ensuring that a member of staff is attendance. The University may impose such conditions and requirements upon the organisers as are reasonably necessary in all the circumstances, ensuring that the conditions and requirements go no further than is necessary to address the risks it has identified. The University shall only pass on the costs of security for using the premises to those arranging the relevant event or meeting in exceptional circumstances.

6.4. Where the University concludes that imposing conditions would not be sufficient, reasonably practicable, or proportionate to enable free speech to prevent serious disorder within premises subject to their control, it has the right to it decline to permit the meeting to proceed.

6.5. Where any person or body to whom this Code applies is seeking to hold an event or meeting outside of the normal academic curriculum the University's Events Procedure in Annex A shall be followed.

7. BREACHES AND COMPLAINTS

7.1. The University shall take steps to secure compliance with this Code of Practice, including where appropriate disciplinary action.

7.2. If an offence is allegedly committed at or in connection with an event or activity to which the provisions of this Code of Practice apply, in addition to any internal disciplinary procedures (staff or student) that may be appropriate, the University may take steps to assist the police in identifying any persons committing offences.

7.3. Any concerns or complaints regarding this Code of Practice or the actions of the University in respect of it should be directed to *safeguarding@law.ac.uk* in the first instance.

7.4. The Office for Students (OfS) operates a free speech complaints scheme. Under that scheme, the OfS can review complaints about free speech from non-student members, staff, applicants for academic posts and (actual or invited) visiting speakers. The scheme is free to use. Information about the complaints that the OfS can review is available on its website

7.5. If you are a student and are not satisfied with the university's response, you may be able to take the matter to the Office of the Independent Adjudicator (OIA). The OIA is an independent organisation that considers student complaints.

8. GOVERNANCE AND REVIEW

8.1. The University's Designated Safeguarding Lead shall ensure compliance with this Code of Practice and its review. The University's Designated Safeguarding Lead shall review this Code of Practice annually and recommend amendments to it for consideration by the Academic Board as appropriate or necessary.

8.2. Each Campus Director and the Marketing Director are authorised by the Academic Board to appoint a Responsible Officer to act on their behalf in relation to their campus, in the case of Campus Directors, and in relation to all marketing events, in the case of the Marketing Director, to ensure events are approved in compliance with this Code of Practice.

Version history:

Version	Amended by	Revision summary	Approval Date
V1.0	Working group	New document, incorporating the previous External Speakers Policy and replacing the Academic Freedom Policy	July 2024
V1.1	Head of Safe and Inclusive Campuses	Full Review	05 August 2026
V1.2	Head of Safe and Inclusive Campuses	Clarification on the OfS free-speech complaints scheme	11 September 2026
V1.2a	Director Quality Assurance & Academic Standards	Definition of 'University' amended to include subsidiaries	30 September 2026

Annex A: Events Procedure

Key definitions

Event	means any University branded or affiliated meeting, event, demonstration, protest, or activity held on or off University Premises or online, with the exception of: (1) timetabled academic activities; (2) administrative activities related to the business of the University; (3) careers and employability activities; and (4) visiting professors' lectures.
Premises	means any premises owned or managed by the University.
Principal Organiser	means the University member leading the organisation of the Event.
Responsible Officer	means the relevant person appointed as Responsible Officer pursuant to paragraph 3.2 of this Code of Practice. Details of staff in those positions can be accessed here.
Student	means anyone who has accepted a place at the University, is currently studying at the University, including studying online courses, or who has completed their period of study but has outstanding assessments.
Visiting Speaker	means any speaker from outside the University who is not a member of the University

1. SCOPE

1.1 This procedure applies to Events as defined in the table above.

1.2 In the event of any doubt as to whether a proposed Event falls under this procedure, the organising body/ individual shall consult the University's Designated Safeguarding Lead (DSL), at the earliest opportunity.

1.3 A flowchart summary of this procedure is contained in Annex C.

2. REQUESTING PERMISSION TO HOLD AN EVENT

2.1 The Principal Organiser must seek permission from the Responsible Officer to invite a Visiting Speaker to speak at an Event no less than 10 working days prior to the Event by submitting the University's Visiting Speaker Request Form (contained in Annex B).

2.2 The Responsible Officer may in their absolute discretion refuse to accept forms submitted after this deadline.

2.3 The Principal Organiser shall update the written request as soon as possible if they become aware of any material changes to the information provided in the original request so that the University can reassess the request.

2.4 The Principal Organiser is responsible for completing a full and proportionate event risk assessment for all events in accordance with university procedures. This risk assessment should include a request for permission for a Visiting Speaker, and any subsequent mitigations identified by the Responsible Officer. Further information regarding risk assessments can be accessed here.

3. CONSIDERATION OF REQUESTS

3.1 In addition to the details contained in the Visiting Speaker Request Form, the Responsible Officer may use whatever resources they deem appropriate (acting reasonably) to consider the request.

3.2 The Responsible Officer will ensure that appropriate and robust processes are in place for assessing the potential risks associated with a proposed Event.

3.3 The University will not unreasonably refuse the holding of Events on its Premises. The expression of controversial views which are not unlawful does not constitute reasonable grounds for withholding facilities for an Event.

3.4 Grounds for refusal would include:

i. the views likely to be expressed by the Visiting Speaker are contrary to the law;

ii. the intention of the Visiting Speaker is likely to be to incite breaches of the law or to intend breaches of the peace to occur;

iii. the Event will include or is likely to include the denial of the right to hold or to express an opposing opinion;

iv. the Visiting Speaker and/or the organisation they represent advocates or engages in violence or non-violent extremism in the furtherance of their political, religious, philosophical or other beliefs;

v. the views likely to be expressed by the Visiting Speaker are for the promotion of any illegal organisation or purpose, including organisations listed on the government's list of proscribed terrorist groups or organisations;

vi. it is in the interest of public safety, the prevention of disorder or crime or the protection of those persons lawfully on premises under the control of the University, that the Event does not take place.

3.5 Where it is reasonable to assume that there could be a breach of the law, the Responsible Officer may consult with the police or require the Principal Organiser of the Event to consult with the police before giving permission for it to take place.

3.6 Where the Responsible Officer has concerns, the matter will be referred to the Campus Director or the Marketing Director. Where the Campus Director assesses that the event presents high risks and/or reputational damage, it will require the consideration and approval of the Pro Vice Chancellor Student Success, Diversity and Inclusion.

4. DECISION

4.1 Within 5 working days of receiving the Visiting Speaker Request Form, the Responsible Officer or their nominee, will advise the Principal Organiser in writing (electronically or otherwise) of their decision with regard to the Event. The decision will state that:

i. permission has been granted and provide details of any instructions or conditions that apply to the permission (see paragraph 5 for further details); or

ii. permission has been withheld and the reasons for the refusal.

4.2 Where the Principal Organiser feels that a decision to refuse the Event or attach conditions is unreasonable, they may raise the matter with their Campus Director or make a complaint via the University's Complaints procedure or, if a member of staff, through their Line Manager.

4.3 Where the Event is planned to take place at a University of Law campus which is based on a site owned by another University the Responsible Officer will only give permission for the Event if it also complies with the host University's visiting speakers' policy.

5. WHERE PERMISSION IS GRANTED

5.1 Permission to hold an Event may be subject to such conditions, as reasonably necessary, to enable the University to fulfil its responsibilities concerning the protection of freedom of speech within the law.

5.2 If, at any stage before the Event, the Responsible Officer is not satisfied that adequate arrangements can be made to maintain good order, permission for the Event may be refused or withdrawn.

5.3 Only those Principal Organisers who undertake to comply with these lawful conditions will be allowed the use of the University's Premises. The conditions may cover:

i. the control over entry to the Event (including, where relevant, the admission or exclusion of the press, television or of broadcasting personnel);
ii. the adequacy of stewarding at the Event and the name of appointment of University staff to oversee the Event on behalf of the Responsible Officer;
iii. the security of University property and Premises;
iv. the arrangements for audio/visual aids;
v. the conduct of the chair/leader;
vi. the introduction of articles or objects from outside;
vii. the state of cleanliness and property after the Event;
viii. the presence of the media;
ix. a requirement that tickets are issued;
x. the presence of staff and/or students capable of challenging the views likely to be expressed; and
xi. any other special conditions that may be deemed necessary.

5.4 Where permission is given for an Event to proceed, the Principal Organiser and the individual chairing or leading the Event have a duty to ensure, as far as is reasonably practicable, that during the Event, both the audience/participants and any speakers act in accordance with the law.

5.5 Where there is unlawful conduct, the chair/leader or the Principal Organiser will give appropriate warnings and if the conduct persists, will exclude the individual or individuals from the Event.

5.6 The University shall only pass on the costs of security for using the premises to those arranging the relevant Event in exceptional circumstances. Whether the

circumstances are exceptional shall be determined by the University's Designated Safeguarding Lead.

6. CONDUCT OF AN EVENT

6.1 The University will seek to ensure that all Events on its Premises are efficiently controlled. Where breaches of the law are suspected the University will call on the police to attend and assist (or in extreme cases to take charge of) the maintenance of law and order.

6.2 The Principal Organiser will attend the Event personally and take all reasonable steps to ensure that:

i. nothing in the preparation for or in the conduct of the Event is likely to breach the law, University regulations or the instructions of or conditions imposed by the Responsible Officer; and

ii. the chair/leader is sufficiently competent to be effective.

6.3 The chair/leader of the Event has a duty as far as possible to ensure that both the audience and the speaker act in accordance with the law during that event. In case of unlawful conduct the chair/leader is required to give appropriate warnings and, in case of continuing unlawfulness, to require the withdrawal or removal of persons concerned by the stewards or security staff.

6.4 While an Event is in progress, the University shall have the right to require the Principal Organiser to terminate the Event if the conduct of the Event gives rise to concerns for the University that the safety of persons attending cannot be reasonably guaranteed, or if there is a breach of the law or a material breach of the Code of Practice or any of the conditions imposed when permission was granted.

6.5 The University may also withdraw its consent and terminate an Event either during or prior to its commencement if it becomes apparent that the content/nature of the event or the identity or numbers of Visiting Speakers previously notified to the University have changed.

6.6 Events/ Visiting Speakers must not be advertised until written approval for the Event to proceed has been received in accordance with this procedure.

Annex B: Visiting Speakers Request Form

If you wish to organise an event with a Visiting Speaker you will need to consult your Campus Responsible Officer under the Code of Practice on Freedom of Speech.

Please do not market or publicise the appearance of this speaker as attending your event until approved. Please complete for each External Speaker attending the event. Principal Organiser to complete and return to the Responsible Officer by email:

Principal Organiser Details	
Name	
E-mail and Phone Number	
Event Details	
Event Title	
Date and Time [arrival and departure]	
Venue details or online platform details	
Principal Organisers Nominee – name. phone number, email address where Principal Organiser will not be present	
Appointed Chair	
Speaker Details	
Name	
Organisation Speaker associated with	
Has this Speaker spoken at the University previously? If yes please give details	
Has this Speaker spoken at other Universities previously? If yes please give details	
Has the Speaker been refused permission to attend an event at the University or another University?	
What will the talk cover?	
Has the Speaker in the past, or might the Speaker on this occasion, cause offence to the groups defined in the Equality Act 2010 (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation)? If YES, please provide details	
Event Procedures and Promotion	
If in addition to English the event be advertised in a different language please give details	
What material will be available at the event?	
Will the event be open to the public or only to members of the University?	
Is there any intention to segregate the event in any way?	
Do you foresee that the event could cause disruption and if so why?	
Will the media be permitted to attend?	
Please provide details of any sponsor	

Will the event be filmed or broadcast live?	

PLEASE NOTE: Premises used for meetings must be left in clean and tidy condition, in default of which the organisers may be charged for any additional cleaning and repairs that are subsequently required. Payment in advance or evidence of ability to pay towards these costs may be required. The University reserves the right to re-charge the organisers of any meeting for any extraordinary expenditure it incurs as a result of that meeting.

Principal Organiser to read and sign: I have read the Code of Practice on Freedom of Speech and confirm that this event and its speakers will adhere to the principles of the statement. I can confirm that I have completed a full and proportionate event risk assessment. I will resubmit this form if any declared details in this submission change prior to the event taking place.

Signed……..

Date……..

Responsible Officer to complete

Speaker Approved/Declined
Risk Assessment Approved/Rejected
Conditions imposed [please insert all conditions imposed to enable speaker event to go ahead]

Signed…….
Date……

Form to be returned to the Principal Organiser

Annex C: University of Law Events Procedure Flowchart

