

## Code of Practice on Freedom of Speech and Academic Freedom

<b>Date</b>	24 July 2025
<b>Related Policies</b>	Charter, Ordinances, Equality, Diversity & Inclusion Policies
<b>Related Procedures</b>	HR Procedures, Student Procedures, Safeguarding Policy, Preventing and Tackling Harassment and Sexual Misconduct
<b>Approving Authority</b>	Council
<b>Contact Point</b>	For staff: line managers; For students: Student Hub
<b>Review</b>	Initial review after one year then scheduled every three years
<b>Version</b>	1.6 July 2025

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### CODE INTENT

This Code sets out the University's position and approach to what it considers are generally reasonable and practicable steps for it to take in order to secure freedom of speech and academic freedom in respect of activities which are likely to arise in the context of a university environment and provided those activities are themselves lawful.

There may be circumstances which arise which are not foreseen by this Code or where it is a difficult for Staff to assess and judge for themselves whether freedom of speech or academic freedom is engaged or to appreciate in what circumstances the University may need to act to secure these rights or limit them in its setting. This Code therefore explains when and how assistance must be sought and from whom.

This Code must be read in conjunction with the Related Policies and Related Procedures set out above and it has the same force as any other policy of the University.

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### PRIMARY LEGISLATION

The primary legislation relevant to this Policy in each case as amended from time to time, includes:

Higher Education (Freedom of Speech Act) 2023.

Higher Education and Research Act 2017.

Equality Act 2010.

Charities Act 2011.

Human Rights Act 1998.

Trade Union and Labour Relations (Consolidation) Act 1992.

## DEFINITIONS

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**Activity/Activities** means all:

- (i) Academic Activities as defined in our Ordinances;
- (ii) external speaking engagements by Visiting Speakers organised by Staff or Students of the University regardless of the method, mode or place of delivery;
- (iii) extra-curricular activity of Students which includes but is not limited to holding and hosting meetings, events, debates, conferences, artistic exhibitions, displays, musical and theatrical performances, sporting events, films taking place on campus or utilising University premises, facilities, or resources and in all cases regardless of the method, mode or place of delivery but otherwise in connection with their membership of the University.

**Academic Freedom:** has the meaning given to it in our Charter as further set out in paragraph 2.7 of this Code.

**Academic Staff:** has the meaning given to it in our Ordinances.

**Code:** this Code of Practice.

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

**Free Speech Advisory Panel:** means the advisory panel consisting of members of the University and/or SUSU appointed by the Responsible Officer from time to time.

**Lawful:** means permissible within acts, statutes, regulations, and statutory guidance of the laws of England and Wales from time to time.

**Principal Organiser:** the individual or group of individuals who are either Staff and/or students of the University primarily responsible for making the determination to carry out an Activity and making or delegating the necessary arrangements for the hosting and delivery of an Activity.

**Responsible Officer:** means the Vice-President (Operations) of the University.

**Request Form:** the request form available from [Legal Services](#).

**Staff:** has the meaning given to it in our Ordinances.

**Student/(s):** has the meaning given to in our Ordinances.

**SUSU:** means the Union of Students of the University as defined in our Charter.

**SUSU Officer:** means the Chief Executive of SUSU.

**Visiting Speakers:** persons, whether or not representing an external organisation, and regardless of whether they hold a formal visiting post with the University, who are formally invited by Staff or Students to speak at a conference, lecture, or participate in a debate or similar speaking engagement.

## 1. Scope

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- 1.1 The University's commitment to Free Speech and Academic Freedom will be reflected in its day-to-day operations as set out in this Code and its obligations are reflected in the University's:
  - 1.1.1 operations for programme development and approval, quality assurance and academic assessment;
  - 1.1.2 operations for facilitating research and knowledge exchange;
  - 1.1.3 funding activities whether by way of endowment, gift, donation, research grants or funding terms, education grants or funding terms or arising from commercial partners;

- 1.1.4 disciplinary and other such processes;
- 1.1.5 the introduction of new policies, procedures or guidance it introduces.
- 1.2 This Code applies to all Activities on any premises wherever situated, which are owned or used by the University, including its halls of residence, SUSU premises and the Faith and Reflection Centre. It also applies, as appropriate, to all Activities of Staff or Students in any other location when authorised to be carried out in the name of the University or of SUSU or organised or sanctioned by the University. For the avoidance of doubt, the principles of this Code also apply to online Activity held by the University.
- 1.3 The University will bring this Code to the attention of Staff and Students when they join the University and on an annual basis.
- 1.4 The University will support Staff and Students in understanding their responsibilities and obligations under the Code and will work with SUSU through the SUSU Officer so that it is clear to the members of SUSU that activities organised by SUSU members which are Activities under this Code, must adhere to this Code even though SUSU is a separate legal entity to the University.
- 1.5 This Code has been implemented following consultation with and consideration by the Education & Student Experience Committee, Equality, Diversity & Inclusion Committee, University Executive Board and Senate. This Code will be periodically reviewed and monitored by the University as set out in paragraph 6. If you have any questions about this Code, Staff must contact their line manager in the first instance and Students must contact the Student Hub. The University will utilise this feedback as part of understanding in what ways the Code or any accompanying guidance or training can be improved. The University may also use surveys and will monitor complaints and concerns raised under this Code to inform its views on the adequacy of the Code, any improvements required to embed lessons learnt or any training required for Staff or Students in respect of the Code.
- 1.6 This Code does not form part of any contract of employment or other form of appointment for Staff. This Code does not form part of Students' education contract with the University. The University may therefore amend it at any time without first consulting or providing advanced notice but nonetheless will consult with recognised trade unions where practicable to do so and all Staff and Students are responsible for consulting and complying with the most current version of this Code.
- 1.7 Nothing in this Code shall itself be construed so as to prevent, deter or otherwise subject workers to a detriment for a reason related to trade union activities or for taking part in peaceful picketing and the University has produced separate [Picketing Guidance](#).

## 2. Principles

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- 2.1 Our University Values are published [here](#) and are the lens through which we make decisions and guide our actions, collective behaviours and systems. They are integral to our purpose of building an inclusive community that makes positive change. We are ambitious; personally, and institutionally, which requires us to be collaborative and collegial.

- 2.2 The University, as an independent institution, does not have a political purpose and any campaigning and political activities must only be taken in the context of furthering our charitable purposes as expressed by our Charter. The University endeavours to provide a platform to facilitate discourse on these and other matters by encouraging Staff, Students and Visiting Speakers to express their views, have an opportunity to be heard and engage in critical debate provided this is Lawful.
- 2.3 As a community, our practices need to enable and empower us. Our community upholds Free Speech and Academic Freedom and develops through constructive, civil debate. Ensuring different views are heard allows us to make the best decisions.
- 2.4 During the course of their studies, Students may be exposed to a wide variety of course materials, topics, or other sources of information which are contrary to their own values and judgements but nonetheless must be considered, debated and discussed within the context of a particular subject or in respect of the expected learning outcomes or skills being developed or taught in that programme of study or indeed simply to develop critical thinking. This is an essential element of learning and being confronted with ideas or views which are controversial or unpopular as long as they are Lawful, will be protected by the University under the principles of the Code.
- 2.5 Recognising the University's duty to promote and protect Free Speech, the starting point for any Activity will be that it is able to go ahead.
- 2.6 We champion equality, diversity and inclusion in all we do. Respect, compassion, and curiosity for what makes us different strengthens our community and the communities we serve, enabling mutual success. People who feel welcomed, included, and respected will use their differences and feel safe to express any differences of opinion so that together we can create and enjoy a transformative experience that drives positive change in the world. We consider that a strong ethos of upholding equality and diversity is consistent with Free Speech.
- 2.7 Academic Staff have freedom within the Law
- (a) to question and test received wisdom, and
  - (b) to put forward new ideas and controversial or unpopular opinions,
- without placing themselves at risk of being adversely affected by the loss of their jobs or privileges at the University or reducing the likelihood of them securing promotion or a different job at the University on this basis. Academic Freedom for Academic Staff is also enshrined in our Charter.
- 2.8 Academic Staff have Academic Freedom and Staff (which includes Academic Staff), our Students and Visiting Speakers have Free Speech and the University will take such steps that are reasonably practicable for it to take to secure their Free Speech provided their speech is Lawful. The University considers that the steps it has set out in this Code will meet these objectives.
- 2.9 Some examples of speech which are not Lawful are:
- The Crime and Disorder Act 1998 establishes aggravated offences of threatening, abusive or insulting conduct (which includes speech) on racial or religious grounds.
  - The Public Order Act 1986 establishes offences in respect of conduct that is intended or likely to stir up racial hatred, or hatred on grounds religion and sexual orientation.
  - Part 1 of the Malicious Communications Act 1988 makes it an offence to send 'indecent and grossly offensive' communications with the intention of causing distress or anxiety.
  - Section 127 of the Communications Act 2003 prohibits sending grossly offensive or obscene messages on public electronic communications networks.

- Provocation of breach of peace by means of public performance of a play.
- Disclosing or communicating information in breach of confidence, data protection legislation, or intellectual property rights.
- Expressions of speech to the extent they are in contravention of the Equality Act 2010, Protection from Harassment Act 1997; anti-terrorism and national security legislation.

- 2.10** The use of the University's premises may be denied, restricted or have other measures and terms imposed where it is Lawful for the University to do so as explained in this Code but use will not be denied nor will the terms on which access is granted be based only in respect of the ideas or opinions of individuals or the policies or objectives of organisations which are Lawful.
- 2.11** No third party may use the University's name (other than as strictly needed in connection with location details for an Activity) or otherwise make use of the University's goodwill, brand or trademarks in connection with an Activity unless they hold a written licence signed by the Responsible Officer.
- 2.12** This Code establishes the Free Speech Advisory Panel who will provide guidance to assist the University community in applying this Code.

### 3. Statement

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#### 3.1 Protection for Free Speech and Academic Freedom

- 3.1.1** Academic Staff have Academic Freedom but must not represent their personal views as those of the University or in a way which suggests or gives the impression that these personal views are endorsed or approved of by the University.
- 3.1.2** In prospective appointment of a third party to an Academic Staff position, the hiring manager at the University must not take into account as a factor in its decision-making for that appointment, the Academic Freedom exercised by that applicant elsewhere.
- 3.1.3** Staff and Students may participate in Free Speech which is Lawful without interference by the University except where the interference by the University is necessary and proportionate to balance competing rights of other parties (including the University) or other duties placed upon the University and therefore that interference is Lawful.
- 3.1.4** When Staff and Students participate in Free Speech which is Lawful, they must not represent their personal views as those of the University or in a way which suggests or gives the impression that their personal views are endorsed or approved of by the University.
- 3.1.5** Staff and Students must respect the rights of one another and other parties to engage in Free Speech. Whilst they may disagree with the views of others or find them offensive, hurtful or distasteful, in disagreeing they should do so in a manner which is itself capable of protection as Free Speech and remains Lawful.
- 3.1.6** Academic Activities do not require any pre-approval by the University under this Code but remain subject to the University's Charter, Ordinances, Regulations and policies.
- 3.1.7** Extra-curricular Activity of students, whether carried out through SUSU or their affiliated student societies or otherwise carried out by Students on a campus of the University or utilising resources or

facilities of the University (including our communication network and digital infrastructure) do not require pre-approval from the University under this Code before proceeding but must still meet the requirements in paragraph 3.2.

- 3.1.8 Staff or Students who invite Visiting Speakers to a campus of the University or to utilise our communication network or digital infrastructure do not require pre-approval from the University under this Code before proceeding but must still meet the requirements of paragraph 3.3.
- 3.1.9 In making any decision under this Code, the University must only apply English law but may consider the 1997 UNESCO Recommendation Concerning the Status of Higher Education Teaching Personnel (adopted by the General Conference of UNESCO in Paris in 1997), relevant research in this area and sector-relevant guidelines and principles<sup>1</sup>.

## **3.2 Procedures for securing Free Speech in Extra-Curricular Activities**

- 3.2.1 Whilst permission is not required under this Code for holding extra-curricular Activity of the kind described in paragraph 3.1.8 on campus, a Principal Organiser must consider a number of factors in the safe running of that Activity which are set out in other University policies and are referenced further below.
- 3.2.2 Where a room booking is required for an extra-curricular Activity, please follow the guidance available [here](#).
- 3.2.3 The organisers of any extra-curricular Activity are required to appoint an individual, who must be a Student or member of Staff, to act as Principal Organiser under this Code. The Principal Organiser shall be responsible, as far as is reasonably practicable, for ensuring that the organisation of the extra-curricular Activity and the conduct of those attending it, whether from the University community or outside, is Lawful and conforms to the provisions of this Code, to all relevant University guidance and to any condition relating to the extra-curricular Activity imposed under this Code.
- 3.2.4 The Principal Organiser for an extra-curricular Activity must take into account health and safety considerations and any relevant licensing requirements. The University holds public liability insurance and information about relevant insurance requirements can be found [here](#). Advice and guidance for carrying out risk assessments for such activities, can be found [here](#).
- 3.2.5 When taking part in extra-curricular Activity, Staff and Students must behave in line with our expectations captured in our policies relating to inclusion and respectful behaviour ([Our policies | Equality, Diversity and Inclusion | University of Southampton](#)).
- 3.2.6 Where the Principal Organiser of an extra-curricular Activity is concerned that owing to complaints, discontent, threats of protest or any other indicators giving rise to concerns that Free Speech may be in jeopardy, the Principal Organiser must:

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<sup>1</sup> Examples include *Chicago Principles* (now endorsed or adopted by 99 higher education institutions in the USA); the *Kalven Committee*; *Russell Group Statement of Principles on Freedom of Speech*. Relevant regulatory advice and statutory guidance includes the [Ofs Regulatory Advice 24: Guidance related to freedom of Speech](#), the [Prevent Guidance](#), *Freedom of Expression Guidance* by the [Equality and Human Rights Commission](#), [Protected Beliefs in higher education](#), [Freedom of speech in HE Legal framework](#), [Freedom of speech and academic freedom checklist](#), Charity Commission's [Campaigning and political activity guidance for Charities](#),

- consider what reasonable measures could be put in place by the University to permit that Activity to continue as planned and reflect this in an updated risk assessment; and
- promptly raise the matter for consideration by the Responsible Officer by completing the Request Form with all the required factual information in connection with that Activity, including a copy of the risk assessment.

3.2.7 Where other members of the University receive complaints or are otherwise aware that an extra-curricular Activity planned to take place on campus is at risk of not proceeding unless additional measures are put in place, the members must bring this matter to the attention of their Dean or their Executive Director who will in turn raise the matter for consideration by the University's Responsible Officer.

3.2.8 In respect of matters raised under 3.2.6 or 3.2.7 the Responsible Officer:

- may raise questions and request further information from the Principal Organiser;
- may consult with the SUSU Officer (if relevant) and the Free Speech Advisory Panel;
- must consider what reasonable measures, if any, can be put in place to allow the Activity to proceed;
- must identify if any measures have been considered but are discounted because they are not reasonably practicable owing to the circumstances, costs, timescales or other relevant factors connected to that extra-curricular Activity;
- decide whether the extra-curricular Activity should be permitted to proceed and if so on what terms;
- must communicate their decision and reason for their decision to the Principal Organiser;
- must keep a record of that decision and its reasons for at least 12 months from the date of that decision.

3.2.9 The measures which the Responsible Officer may require to be put in place under 3.2.8 may include one or more of the following considerations:- change in venue or location, change from in-person to online or vice versa, crowd control measures, ticketing, limiting or controlling number of participants, delaying starting times, stewarding arrangements, alternative entry or exit points to site, security or policing measures, postponement or any other reasonable measure relevant to the anticipated scale of protest or dissent or other aspects of concern which have arisen or may arise regarding that Activity.

3.2.10 The Responsible Officer may deny permission for the University's premises, facilities or resources to be used for extra-curricular Activity where they reasonably consider that the proposed Activity is (i) not Lawful, (ii) is Lawful but one or more of the required measures required under 3.2.9 cannot be implemented at all or in time and there are no other reasonably practicable measures which the University could put in place to allow the Activity to proceed whilst balancing competing rights of third parties (or the University) or other obligations on the University. Where the matter may reasonably be considered to involve SUSU, the Responsible Officer may consult with the SUSU Officer before reaching a determination but will ultimately be the decision-maker.

### **3.3 Procedures for securing Free Speech for Visiting Speakers**

3.3.1 No permission is required for Staff or Students to invite Visiting Speakers to a campus of the University or to utilise our communication network or digital infrastructure for a speaking engagement of the kind described in paragraph 3.1.8. However, Principal Organisers must check that the Visiting Speaker

does not belong or profess to belong to a [proscribed organisation](#) or encourage support for [proscribed organisations](#).

- 3.3.2 Where a room booking is required for a Visiting Speaker Activity, please follow the guidance available [here](#).
- 3.3.3 In accordance with the functioning of Free Speech, individuals are required to behave in a way which enables Staff, Students or other participants to access any Activity, or its immediate vicinity, and allows them to hear a speaker and contribute to discussion, including questioning the views of those participating in the Activity.
- 3.3.4 The Principal Organiser for a Visiting Speaker Activity must take into account health and safety considerations and any relevant licensing requirements. The University holds public liability insurance and information about relevant insurance requirements can be found [here](#). Advice and guidance for carrying out risk assessments for such activities, can be found [here](#). The risk assessment must be informed by due diligence of the Visiting Speaker, including an internet search of dissenting activity at any prior speaking engagements elsewhere, their social media profiles and indicators of extremist views being held. For Visiting Speaker Activity held online, Principal Organisers must remember to abide by the University's [information security management system policies](#).
- 3.3.5 When taking part in a Visiting Speaker Activity, staff and students must behave in line with our expectations captured in our policies relating to inclusion and respectful behaviour ([Our policies | Equality, Diversity and Inclusion | University of Southampton](#)).
- 3.3.6 Where the Principal Organiser of a Visiting Speaker engagement, is concerned that owing to complaints, discontent, threats of protest or any other indicators giving rise to concerns that Free Speech may be in jeopardy, the Principal Organiser must:
- consider what reasonable measures could be put in place by the University to permit that Visiting Speaker Activity to continue as planned and reflect this in an updated risk assessment;
  - raise the matter for consideration by promptly completing the Request Form with all the required factual information in connection with that Visiting Speaker Activity, including a copy of the risk assessment.
- 3.3.7 Where other members of the University receive complaints or are otherwise aware that Visiting Speaker Activity planned to take place on campus is at risk of not proceeding unless additional measures are put in place, the members must bring this matter to the attention of their Dean or their Executive Director who will in turn raise the matter for consideration to the Responsible Officer.
- 3.3.8 In respect of matters raised under 3.3.6 or 3.3.7 the Responsible Officer:
- may raise questions and request further information from the Principal Organiser;
  - may consult with the SUSU Officer (if relevant) and the Free Speech Advisory Panel;
  - must consider what reasonable measures, if any, can be put in place to allow the Visiting Speaker Activity to proceed;
  - must identify if any measures have been considered but are discounted because they are not reasonably practicable owing to the circumstances, costs, timescales or other relevant factors connected to that speaking engagement;
  - decide whether that speaking engagement should be permitted to proceed and if so on what terms;



- must communicate their decision and reason for their decision to the Principal Organiser;
- must keep a record of that decision and its reasons for at least 12 months from the date of that decision.

3.3.9 The criteria, terms or measures which the Responsible Officer may require to be put in place under 3.3.8 typically include one or more of the following considerations:- change in venue or location, change from in-person to online or vice versa, crowd control measures, ticketing, limiting or controlling number of attendees, delaying starting times, stewarding arrangements, alternative entry or exit points to site, security or policing measures or any other reasonable measure relevant to the anticipated scale of protest or dissent selection of a Chairperson, note-takers, facilitating change to a debate format or requiring additional speakers with opposing views for balanced debate, issuing advanced warnings to attendees, postponement, or other aspects of concern which have arisen or may arise regarding that Activity.

3.3.10 Everyone who organises, speaks at, or attends a Visiting Speaker Activity at the University is required to observe good order. Good order includes, but is not limited to, refraining from the following:

- preventing participants from accessing or leaving the venue safely;
- preventing the Visiting Speaker or other speakers from being heard clearly;
- chanting or using foul or abusive language, including racial abuse;
- refusing reasonable requests from the chairperson, stewards or other Staff involved in managing a Visiting Speaker Activity;
- throwing any item;
- acting in any other way which is threatening or abusive, or which denies to others their right to Free Speech.

3.3.11 The University, through its ordinary internal costs allocation model, will provide for the costs of security in connection with a Visiting Speaker Activity where a security presence is deemed necessary by the Responsible Officer except where the circumstances are exceptional. Exceptional circumstances may include for example the mobilisation of a larger security team, other resources, implementation of special policing measures and internal resources which are strained by capacity or insufficiency (financial or people) and time constraints as determined by the Responsible Officer acting reasonably. Where the University is engaged in the commercial activity of hiring out its premises to a third party for an event, that third party organisation must bear the full costs associated with that hire, including any additional security costs and must hold the required levels of public liability insurance for their event. The University will not use its charitable assets to subsidise the activities of third parties.

3.3.12 The Responsible Officer may deny permission for the University's premises, facilities or resources to be used for that speaking engagement where they reasonably consider that the proposed Visiting Speaker Activity is (i) not Lawful, (ii) is Lawful but one or more of the required measures required under 3.3.9 or 3.3.11 cannot be implemented at all or in time and there are no other reasonably practicable measures which the University could put in place to allow the Visiting Speaker Activity to proceed whilst balancing competing obligations and duties on it.

## **4. Raising Concerns about Free Speech in other Matters**

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- 4.1 Eligible persons (as set out in paragraph 4.2) may make Free Speech complaints to the University where they consider that they have suffered adverse consequences because the University has acted or failed to act, in breach of its freedom of speech duties as soon as practicable but in any event within 3 months of the date of the act or omission to act giving rise to the complaint. .
- 4.2 Eligible persons referred to in 4.1 above are:
- 4.2.1 Staff: the complaints shall be raised under the University's Grievance Procedure.
  - 4.2.2 Students: the complaints shall be raised under Regulations Governing Student Complaints.
  - 4.2.3 Applicants for academic posts: the complaints shall be raised to the Executive Director of Human Resources.
  - 4.2.4 Visiting Speakers or in connection with a decision taken by the Responsible Officer under paragraphs 3.3.12: the complaints shall be raised in writing to the President and Vice-Chancellor.
- 4.3 In considering a complaint raised under 4.2.3 to 4.2.4, the University may request further information from the complainant. It does not necessarily need to hold a meeting with the complainant provided it can understand the nature and basis of the complaint from the paperwork submitted. Where a meeting is required, the complainant will make itself available for one.
- 4.4 The University may determine that the complainant under paragraph 4.2.3 or 4.2.4 and/or a complaint is not eligible, the complaint is vexatious or frivolous, the complaint is out of time, or where it is eligible that there was no breach of the University's freedom of speech duties. Where the University considers that it did breach its freedom of speech duties, it must also be satisfied that it is as result of this breach by the University that the complainant suffered the adverse consequence complained of. All decisions made by the University will be accompanied by reasons provided in writing.
- 4.5 Where Staff are concerned that the University is not meeting its duties under the Code, but they do not have a grievance under paragraph 4.2.1, they may raise these matters with their line manager in the first instance who should in turn raise this for consideration to a member of the University's Executive Board. Alternatively consideration should be given as to whether it may be raised under the University's [Whistleblowing Policy](#).
- 4.6 Students who are concerned that the University is not meeting its duties under the Code, but the matters raised do not necessarily affect them personally, may raise these matters with the Student Hub in the first instance who should in turn raise this for consideration to a member of the University's Executive Board.

## 5. Compliance with the Code

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- 5.1 Staff that fail to comply with this Code may result in action being taken against them under our [Employment Procedures](#).

- 5.2 Students that fail to comply with this Code may result in action being taken against them under our [Regulations Governing Student Discipline](#).

## 6. Roles and Responsibilities

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### **Council**

- Responsible for approving this Code.
- Responsible for ensuring the University promotes the importance of Free Speech.

### **Audit and Risk Committee**

- Responsible for monitoring the University's adherence to this Code.

### **President and Vice-Chancellor**

- Responsible for keeping the Code under review and securing compliance with this Code.
- Responsible for hearing complaints under paragraph 4.2.4.

### **Members of the Executive**

- Responsible for ensuring that the faculties, schools, and directorates under their control or remit comply with this Code.
- Responsible for ensuring that the committees, boards, working groups which they Chair and projects which they sponsor consider and apply the Code where relevant and that the Code is reflected in the University's processes for: programme development, approval and delivery; research; staff and student conduct; and third-party relationships.
- Are collectively responsible for promoting the importance of Free Speech.
- Are collectively responsible for ensuring that matters of the University which are presented to them for approval include a consideration of and mitigation of risks to Free Speech or to Academic Freedom if relevant.
- Are collectively responsible for ensuring as far is reasonably practicable that the use of any premises of the University is not denied to any individual or body on grounds connected with them as individuals, their ideas or opinions, or in relation to a body, its policies or objectives or ideas or opinions of any of its members.

### **Vice-President (Operations)**

- Responsible for making the determination of what, if any, additional measures must be put in place by Principal Organisers.
- Responsible for determining if access to the University's premises or communication networks will be refused or withdrawn and communicating the reasons for this to the Principal Organiser.

### **Deputy Vice-President (Operations - Students and Infrastructure)**

- Responsible for bringing this Code to the attention of Students at least once a year.
- Responsible for arranging for necessary training to ensure Students understand the Code, know how to adhere to it and understand their commitment to Free Speech.
- Must ensure that Student policies are reviewed for any conflict with this Code and an action plan is put in place to address any conflicts.
- Responsible for monitoring complaints or disciplinary matters raised by Students where issues of Free Speech have featured, recording these matters and reporting them to the Audit and Risk Committee at least once per year.

- Responsible for ensuring that where a complaint is made to Student Support about student misconduct or alleged misconduct concerning sexual abuse, sexual harassment or sexual misconduct or other bullying or harassment, that a non-disclosure agreement (or terms having this effect) are not used by the University.

#### **Executive Director, Human Resources**

- Responsible for bringing this Code to the attention of staff at induction and considering the development of appropriate staff training to ensure it is understood and adhered to.
- Must ensure that Human Resources policies are reviewed for any conflict with this Code and an action plan is put in place to address any conflicts.
- Responsible for ensuring that recruitment policies, procedures and guidance are in place to ensure that in the prospective rejection of an applicant for a prospective Academic Staff position, the exercise of Academic Freedom by that applicant is not taken into account in appointments to those posts.
- Responsible for monitoring grievances raised by Staff where issues of Free Speech or Academic Freedom have featured, recording these matters and reporting them to the Audit and Risk Committee at least once per year.
- Responsible for ensuring that where a complaint is referred by line managers to HR about staff misconduct or alleged misconduct concerning sexual abuse, sexual harassment or sexual misconduct or other bullying or harassment, that a non-disclosure agreement (or terms having this effect) are not used by the University.

#### **Staff**

- Must be aware of and follow this Code and its associated procedures and guidance.
- Must not request the use of a confidentiality or non-disclosure agreement in respect of misconduct or alleged misconduct concerning sexual abuse, sexual harassment or sexual misconduct or other bullying or harassment.
- Must ensure that the exercise of Academic Freedom by staff or applicants is not considered as a factor in appointment, promotion, or other privileges.