

UKMC Procedure for Holding Events and Guest Speakers 24-25

Version 1

Date	Auth	ior	Summary of Changes	Version	Authorise d		
08/10/2025	Head		Policy adjustment in line with governance	1	Academic		
	_	lity and	and include reference to Risk Assessment		Board		
	e	plianc	and procedure form				
Policy/Procedure	 Mana	gement	and Responsibilities				
			·				
Policy/Procedure			cedure is owned by the Executive Board, supported by the Equity,				
Owner			ty and Inclusion Committee				
Equality Analysis		By EDI	Committee (minutes Oct 2025)				
Authorised By EDI C		EDI Co	Committee, Executive Board				
Effective From		October 2025					
Next Review		July 2026					
Version 1		1	·				
Internal/External		Both					
Document Location		<u>UKMC</u>	Policies and Legislation				
Linked Documents		Academic Freedom of Speech and Expression Code of Practice Policy					
Internal		EDI Policy					
		Safeguarding and prevent policy					
		Health and Safety Policy					
Linked Documents		Condition E6: Harassment and sexual misconduct - Office for Students					
External		Raising concerns about free speech - Office for Students					
<u> </u>		Prevent duty guidance: England and Wales (2023) - GOV.UK					
Dissemination Plan		Public availability on the UKMC website and E6 website area.					
		Include reference within relevant trainings and academic learning areas.					

Accessibility

Alternative formats on request. Email Quality@ukmc.ac.uk

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Procedure Purpose

This procedure is designed to enable UKMC to:

- **Uphold and protect freedom of expression**, ensuring that lawful debate and discussion can take place without undue interference or suppression of ideas.
- Foster a safe, inclusive, and respectful environment where all members of the College and community are protected from harm, discrimination, and harassment, irrespective of race, gender, disability, religion or belief, sexual orientation, age, social background, or protected characteristics.
- Ensure the responsible review and management of speaker, events, or activity requests for events that:
 - o take place on the college premises; or
 - o are organised in the name of, or on behalf of, the University.
- Review requests in line with the <u>UKMC Academic Freedom of Speech and Expression Code of Practice Policy.</u>

Procedure Guidance

- The Academic Freedom of Speech and Expression Code of Practice Policy ensure the protection of speech within the law. UKMC works with these important principles with integrity. For more information, please see the policy on UKMC | Policies and Legislation
- 2. The attached form is referenced in the Academic Freedom of Speech and Expression Code of Practice Policy and to be completed for proposed events involving speakers events, and/or activities where the topic may incorporate sensitive or potentially controversial matters, which may reasonably require to conduct a risk assessment to ensure compliance with Academic Freedom and Freedom of Speech Code of Practice, Prevent, and Equality Act, as well as any relevant UK Government or regulatory legislation or guidance.
- 3. Please complete the proforma and submit the request to your **Head of Student Engagement,** who will raise the request with the Equity, Diversity and Inclusion
 Committee. In their absence, please raise request this via the Dean's office.
- 4. Where topics relate to mental health, trauma, safeguarding, or sensitive social issues, consultation with the Head of Wellbeing or Wellbeing Department is recommended to ensure appropriate communication and support are in place.

- 5. The Equity, Diversity and Inclusion Committee membership, and terms of reference provide neutrality and a variety of perspectives to reasonably approve, or refuse, a request. The Committee will assemble and follow the three-step test from OfS Guidance related to freedom of speech which highlights three key considerations which are within the Risk Assessment Form within this document. These are, (1) Is the speech within the law? (2) Are there reasonably practicable steps to allow it? (3) If restricted, is the restriction prescribed by law and proportionate?
 - https://www.officeforstudents.org.uk/media/1mvnscrl/regulatory-advice-24-freedom-of-speech-guidance.pdf
- 6. The Committee membership's relevant expertise will also support the evaluation and recommendations relating to the approval or refusal of the proposal.
- 7. All decisions (approval, conditional approval, or refusal) are recorded, for example in committee minutes.
- 8. The request form will also be stored with the committee minutes for records.
- 9. A decision will be communicated to the organiser, with a clear rationale and, where relevant, escalation to senior management or other stakeholders.

Review Timeline and Process

This attached form **must be submitted 4 weeks before** the proposed visit date, unless agreed with the Dean, Provost, or delegated person in writing. This is to ensure sufficient time to convene the Equity, Diversity and Inclusion Committee and assemble a Freedom of Speech Panel for essential approval functions. Events submitted after the deadline may be refused unless there is extraordinary justification.

Once the request is received it will be acknowledged and the Equity, Diversity, and Inclusion Committee will aim to review. This will then be communicated the review to the Freedom of Speech Panel within **10 working days**,

The Freedom of Speech Panel will aim to review the Committee considerations within <u>5</u> working days by written statement that will either grant (potentially subject to conditions) or withhold permission for the use of UKMC premises for the event.

Breaches, Complaints and Appeals

If for any reason you may be dissatisfied with the outcome of a request, any concerns or complaints which are relevant to procedure and Code of Practice should follow the Breaches and Complaints process within refer to the Academic Freedom of Speech and Expression Code of Practice Policy. This can be found at UKMC | Policies and Legislation

Appeals against the decision of the Freedom of Speech panel may be made within <u>5 working</u> <u>day</u>s to the provost, whose decision will be final. This will be reported to the next meeting of the Board of Directors.

All proposals are reviewed on a case-by-case basis.

Note on Adverising

No advertising of the event is permitted until the Provost or Deputy Provost (or nominee) has communicated a decision that the event can proceed in compliance with the Code of Practice. UKMC reserves the right to refuse or delay any event with a visiting speaker if this procedure is not followed. (UKMC Academic Freedom of Speech and Expression Code of Practice Policy)

Following the approval of an activity, the organiser and First Person of Contact (FPOC) should work with the Head of Marketing to coordinate any marketing, advertising, and branding requirements.

Responsibilities

The organiser is responsible for providing honest and accurate information that can support the reasonable evaluation of a proposal.

The Equity, Diversity and Inclusion Committee is responsible to convene and ensure a balance and diverse approach to evaluating the proposal, treating the request with the seriousness, care, and respect it deserves. This ensures that UKMC values, and stakeholders are thoroughly considered and honoured in each request that is received.

The EDI Committee may contact the organiser for further information to evaluate the proposal thoroughly, and in respect of any guests or other contacts outlined in the form. The EDI committee recommendations will report to the Executive Board, to which the final decision will be made on the balance of the evidence and probabilities presented.

The Designated Safeguarding Lead is responsible for evaluating safeguarding and Prevent factors. In the event any safeguarding or Prevent duties, or significant threat to student or staff welfare are raised, the EDI Chair liaise may escalate through senior management and/or lawful channels to ensure safety of all staff, students, and communities.

The Dean or nominee is responsible for evaluating the Academic Freedom and Freedom of Speech factors and/or review of activity content.

The Head of Health and Wellbeing is responsible for providing expertise regarding the wellbeing impact and reasonable adjustments or considerations that may support the organiser or mitigation of risks deriving from the risk assessment form. **Related**

Policies and Legislation

The college has an obligation and ethical duty to consider the impact of relevant laws and legislations, and ongoing regulatory and legal guidance (www.gov.uk).

UKMC policies can be found at <u>UKMC | Policies and Legislation</u>.

- Safeguarding Policy, (Duty of Care)
- Prevent Policy
- Academic Freedom of Speech and Expression Code of Practice Policy
 The OfS has published Regulatory Advice 24: Guidance related to freedom of
 speech, which outlines the "secure" duty (i.e. to take reasonably practicable
 steps to secure lawful speech) and the "code" duty (i.e. to maintain a code of
 practice) https://www.officeforstudents.org.uk/publications/regulatory-advice-24-guidance-related-to-freedom-of-speech/
- Freedom of thought, conscience, and religion
- Health and Safety Policy
- Charity Law
- Human Rights Act 1998
- Equality Act 2010
- Public Order Act 1986
- Data Protection Policy

Guidance for Potential Outcomes

To support transparent decision making, the following tables are provided as guidance regarding the Academic Freedom of Speech and Expression Code of Practice Policy in relation to the request of holding of events and guest speakers.

Please note that this is not an exhaustive list of potential outcomes, however, is intended to provide guidance regarding the acceptance and refusal criteria of events, activities, and speakers.

Reason for Approval

The risk assessment indicated a low risk and is approved and may proceed as planned **Explanation**

- Alignment with Student Experience & Values: The event provides
 educational, cultural, or professional value to students, aligns with
 UKMC's mission and values, and contributes positively to the academic
 community.
- Legal & Policy Compliance: The event fully complies with the Colegges
 Freedom of Speech and Academic Freedom policies, the Equality Act
 2010, the Prevent Duty, data protection legislation, safeguarding
 obligations, and other relevant UK legislation or statutory guidance.
- Freedom of Speech within the Law: The speaker and content are
 permitted, ensuring lawful expression of diverse views while avoiding
 speech that is unlawful (e.g. incitement to violence, hatred, terrorism, or
 harassment).
- Risk Assessment & Mitigation: Any identified risks (security, reputational, health and safety, or legal) can be reasonably managed with proportionate mitigation measures in place.
- **Resources & Feasibility**: The college has the capacity, staffing, facilities, and time to support the proposed event effectively without detriment to other core activities.
- No Undue Reputational Harm: The event will not reasonably be expected to cause serious harm to the college reputation or relationships with stakeholders, provided it is conducted in line with approved guidelines.
- The proposed event or guest speaker can take place provided the following adjustments or safeguards are implemented. Conditions may include, but are not limited to:
- Security Arrangements: Additional security or safety measures are required to ensure the wellbeing of attendees, staff, and the wider community.
- Balanced Representation: Where necessary, arrangements should be made to provide opportunities for alternative viewpoints or balanced discussion, in line with the duty to uphold freedom of speech within the law
- Content Adjustments: Event content, advertising, or promotional materials must be revised to remove misleading, discriminatory, defamatory, or otherwise unlawful content.
- Audience Restrictions: Attendance may be limited to a particular group (e.g. staff/students only, ticketed entry) to manage risk effectively.

The risk
assessment
indicates a
medium risk and
ay proceeds
subject to certain
adjustments being
made or
conditions being
met

	 Safeguarding Measures: Additional checks or protocols (e.g. DBS requirements for work with under-18s or vulnerable adults) must be met before the event proceeds. Compliance Confirmation: The organiser must provide confirmation in writing that the event will comply with the College Freedom of Speech Code of Practice Policy, Equality, Diversity and Inclusion principles, Prevent Duty obligations, and other statutory requirements. Resource Allocation: Adjustments may be required to scheduling, staffing, or facilities to ensure the event can be delivered without detriment to the college core functions.
Potential Reason for Refusal	Explanation
There is reason to believe one of the following:	 the views likely to be expressed by any speaker are contrary to the law the intention of any speaker is likely to be to incite breaches of the law or to intend resulting breaches of the peace the meeting will include or is likely to include the denial of the right to hold or to express an opposing opinion the speaker and/or the organisation they represent advocates or engages in violence or nonviolent extremism in the furtherance of their political, religious, philosophical or other beliefs in accordance with UKMC's responsibilities under the Prevent Duty, 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 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 UKMC, that the meeting does not take place
Insufficient Notice	The request was not submitted within the required timeline, and no prior agreement was made with the Dean/Provost, or nominee.
Incomplete	The form was missing essential details (e.g., speaker biography, purpose of
Information	event, target audience, logistical requirements).
Conflict with College Values/Policies	The proposed event or speaker contradicts the institution's policies (e.g., equality, diversity, inclusion, safeguarding, freedom of speech within the law).
Scheduling Conflict	The date/time clashes with major College events, teaching schedules, or room availability.
Budget/Resource Limitations	The College cannot provide the required financial or staffing resources to support the activity.
External Compliance Issues	Legal or visa restrictions prevent the event or speaker from proceeding.

Organiser Form

Please provide details may help with the review of this proposal.

Organiser Details

Name of Organiser	
Student Number / Job Role	
Contact Email	
Contact Number	
Any other persons supporting the activity	
(Student representative, Student	
association, staff, Debate moderator.	
Dean etc.)	

Activity Time

Proposed Date(s)	
Proposed Time(s) or schedule for the	
activity	
Proposed Venue	

Visit Content & Purpose

Title or Subject or the Speaker/ Activity/	
Event	
Are there any external guests or	
speakers?	
If the event happened before, was there	
any feedback?	
Please provide an overview of the event.	
Intended Audience (e.g., course cohort,	
open to public, all students, students	
and staff)	
How many participants do you	
anticipate? (Estimate)	
Will the activity be supporting academic	
studies? (For example, related to a	
course, related to skill development,	
academic freedom)	

Mitigations

If you have noted any risks, please detail	
any steps you have taken to mitigate any	
risk.	
(This could be around space, venue	
capacity, material content, safeguarding	
concerns, security, food and allergen	
safety, etc.)	
Any other comments or considerations?	

Declaration & Agreement

I confirm that the information provided is accurate and I understand that the college reserves the right to refuse proposals considered high risk.

Are you aware of any other reasons that	□ Yes □ No
there may be a conflict of interest?	
(such as personal, financial interests,	If 'Yes', please provide details that may:
more details can be found at	
Guidance: Conflicts of Interest (HTML) -	
GOV.UK <u>)</u>	
l am aware of the Anti-Bribery Act 2010	□ Yes □ No
Bribery Act 2010 guidance - GOV.UK	
Have you received any gifts in relation to	□ Yes □ No
this request?	If yes, please provide details:
Name of Organiser	
Signature of Organiser	
Date	

For Administrative Use Only

Risk Assessment

For use by the EDI Committee to conduct Risk Assessment in line with Academic Freedom of Speech and Expression Code of Practice Policy.

High Risk = The activity poses a high or significant risk to stakeholders, institution, or compliance with law and legislations.

Medium Risk = The activity poses a risk that requires consideration or mitigations in place to proceed.

Low = The activity poses little or minimal perceived risk

Query	Comments	Hi	Med	L
		gh	ium	0
		Ri	Risk	w
		sk		Ri
				sk
Od. Danathannan and title				
Q1: Does the proposed title				
or theme of the External				
Speaker event present a				
potential risk that				
views/opinions expressed				
may raise Freedom of				
Speech issues?				
Q2: Has the proposed				
activity previously been				
prevented from speaking at				
UKMC, or another				
educational institution, or				
previously been known to				
express views that may be				
in breach of the UKMC Code				
of Practice?				
Q3: Is the proposed activity				
theme likely to attract				
attendance from				
individuals/groups that				
have previously been known				
to express views that may				
be in breach of the Code of				
Practice?				

Q4: Is the proposed activity,			
and/or the theme or content			
of the event particularly			
controversial or polarising?			
Is it likely to attract protest			
or demonstration? Is there			
likely to be press interest?			
Does the proposed activity,			
or the theme or content of			
the event pose a significant			
reputational risk to UKMC?			
The three-step test from OfS	\Box (1) Is the speech within the law? (2)		
https://www.officeforstudents.org.uk	☐ Are there reasonably practicable		
/media/1mvnscrl/regulatory-advice- 24-freedom-of-speech-guidance.pdf	steps to allow it?		
<u> </u>	stops to allow it:		
	\square (3) If restricted, is the restriction		
	prescribed by law and proportionate?		
Does the event involve any of	□ Political topics or activism		
the following? (tick all that	☐ Religious or faith-based content		
apply):	☐ Potentially controversial or sensitive		
	issues (e.g. race, gender, identity)		
	Topics that may affect community		
	relations or campus safety		
	U Harm Calf Harm Violance		
	□ Harm, Self Harm, Violence		
	☐ The nature of the activity could be		
	\square The nature of the activity could be		
	\square The nature of the activity could be		
	☐ The nature of the activity could be controversial or cause distress		
	☐ The nature of the activity could be controversial or cause distress ☐ Other: Please		
Is there content or a	☐ The nature of the activity could be controversial or cause distress ☐ Other: Please		
Is there content or a schedule provided for the	☐ The nature of the activity could be controversial or cause distress ☐ Other: Please specify		
	☐ The nature of the activity could be controversial or cause distress ☐ Other: Please specify		
schedule provided for the	☐ The nature of the activity could be controversial or cause distress ☐ Other: Please specify		
schedule provided for the activity that needs to be reviewed?	☐ The nature of the activity could be controversial or cause distress ☐ Other: Please specify		
schedule provided for the activity that needs to be reviewed? Have you received and/or	☐ The nature of the activity could be controversial or cause distress ☐ Other: Please specify		
schedule provided for the activity that needs to be	☐ The nature of the activity could be controversial or cause distress ☐ Other: Please specify		
schedule provided for the activity that needs to be reviewed? Have you received and/or reviewed the content of the	☐ The nature of the activity could be controversial or cause distress ☐ Other: Please specify		

accessibility or dietary	(For example: step-free access, large		
arrangements?	print materials, quiet spaces, or dietary		
	requirements related to health or		
	religion)		
Will the visitor collect,	□ Yes □ No		
access, or process any	(If yes, please discuss with the UKMC		
personal data?	Data Protection Officer (DPO))		
Will food or beverages be	□ Yes □ No		
provided at this event?	Please detail dietary or cultural		
	considerations.		
Any other comments or			
considerations?			

Decision Outcome

Post Event Feedback (Where Applicable)

Outcome of visit (based on good content,	1 Very Poor
good engagement, positive alignment	2 Poor
with college values, consideration of EDI	3 Good
values, alignment with legislations and	4 Very Good
law).	5 Outstanding

Would you have the speaker visit or host	
this activity again?	
Why? Why not?	
Were there any issues or near misses?	
A near miss is an issue that might have	
resulted in a risk or more serious	
negative outcome.	