MANCHESTER METROPOLITAN UNIVERSITY

CODE OF PRACTICE ON FREEDOM OF SPEECH

1. Introduction and values

- 1.1. Manchester Metropolitan University (the "University") is committed to protecting and encouraging freedom of speech and academic freedom (together "free speech").
- 1.2. The values of free speech underpin the University's core purpose; to be a place where academic enquiry, freedom of expression and open discussion advance knowledge.
- 1.3. To support this purpose, the University seeks to foster an environment where all members of our community can engage with each other and the public, in lawful, dialogue and debate, where members are open to intellectual challenge and change and where civility, tolerance, respect and dignity are always present.
- 1.4. We recognise that there are occasions when vigorous debate can be difficult, contentious and may create offence. However, provided the views expressed are lawful and do not infringe others' rights, this will be permitted. Speech that unlawfully discriminates or threatens others' safety or freedom of expression will not be tolerated.
- 1.5. The purpose of this Code of Practice is to ensure that, as far as reasonably practicable, free speech within the law is secured for all members of the University community. Free speech includes spoken and written materials including physical and online formats.
- 1.6. This Code of Practice and in particular the duty to secure free speech must be considered by all members of the University when interpreting and implementing all other codes of practice, policies and procedures.

2. Legal Context

- 2.1. The legal duty of UK universities to secure freedom of speech is set out in legislation¹. Similarly, the right of academic staff to "question and test received wisdom and put forward new ideas and controversial or unpopular opinions without placing themselves at risk…" ("academic freedom") is also protected².
- 2.2. This Code of Practice is in place to ensure the University acts in accordance with its free speech duties, specifically to:

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¹ Education (No. 2) Act 1986 (as updated by the Higher Education and Research Act 2017) and the Higher Education (Freedom of Speech) Act 2023) and the Human Rights Act 1998

² As above

- (a) take the steps that, having particular regard to the importance of freedom of speech, are reasonably practicable for it to take in order to secure freedom of speech within the law for staff, members, students and visiting speakers, this includes, in relation to academic staff, securing their academic freedom (the "Secure duty"); and
- (b) maintain a code of practice setting the University's values relating to freedom of speech and how those values uphold freedom of speech (the "Code duty").
- 2.3 In addition to the Secure and Code duties, the University is also subject to other legislative and regulatory requirements which must be taken account of when considering issues of free speech, these include but are not limited to:
 - (a) Freedom of thoughts, conscience and religion and freedom of expression derived from European Convention on Human Rights (as incorporated into the domestic Human Rights Act 1998);
 - (b) To have regard for the duty to eliminate discrimination, harassment, victimisation and advance equality as imposed by the Equality Act 2010;
 - (c) Civil and criminal harassment offences, and similar conduct, under the Protection from Harassment Act 1997;
 - (d) Public Order Act 1986 offences relating to conduct, speech or actions which cause persons to fear for their safety or cause other harassment, alarm or distress; and
 - (e) Terrorism Acts 2000 & 2006 and Counter Terrorism and Security Act 2015 which place duties on universities to prevent people being drawn into terrorism (the Prevent Duty).

3. Scope

- 3.1. This Code of Practice must be followed by all members, students, and employees of the University and all external visitors to the University in respect of:
 - (a) the University (which includes all bodies or persons having authority to determine any matter relevant to this Code);
 - (b) all governors and staff of the University (including honorary positions);
 - (c) all students of the University;
 - (d) the Students' Union and its constituent societies, its premises, employees and sabbatical officers;
 - (e) any visiting or guest lecturers to the University or the Students' Union invited by staff, governors or students of the University or the Students' Union:
 - (f) any person or organisation wishing to hire premises controlled by the University or the Students' Union for an event;
 - (g) persons invited or otherwise lawfully on premises controlled by the University or the Students' Union for the purposes of a meeting, event or other activity;
 - (h) external speakers, meetings, events and activities which do not take place on the University's or the Student Union's premises but are organised by, or under the auspices of, the University or the Students' Union;

(i) use of digital technology to communicate remotely under the auspices of the University or Students' Union.

4. Principles

- 4.1. The University will start from a presumption that:
 - (a) all speech is permitted; and
 - (b) all teaching materials and views expressed as part of teaching or research and connected with a course of study are unlikely to constitute harassment.
- 4.2. The University endeavours to ensure that members are not discouraged from expressing themselves freely within the law, with a view to supporting critical and reasonable debate.
- 4.3. All members of the University community are responsible for day to day compliance with this Code of Practice and upholding the rights and responsibilities of free speech.

5. Procedures for meetings, events and activities

- 5.1. As part of the Secure duty, the University will, as far as reasonably practicable, ensure that use of any of its premises (including the terms on which the premises are provided), is not denied on grounds connected with the beliefs or views of an individual or body, or the policy or objectives of the body or ideas or opinions of its members.
- 5.2. The remainder of this Code of Practice details the procedures that shall apply when arranging meetings, events and activities.

6. Roles: meetings, events and activities

- 6.1. Key roles:
 - The *Principal Organiser*: the person responsible for the meeting, event or other activity that involves an external speaker;
 - The Responsible Officer: the person responsible for considering if the meeting, event or activity can or cannot be held and any mitigating measures which need to be implemented;
 - The Reviewing Officer: the person responsible for considering any appeals.
- 6.2. A *Principal Organiser* can be:
 - a named staff member of the Students' Union;
 - a University staff member on a contract of 0.2 FTE or greater;
 - a representative of an external organisation booking events through the Conference Office.

6.3. The Responsible Officer:

 Where requests are for events to be held on university premises, unless otherwise determined by the Vice-Chancellor or the Chief Operating Officer, the Responsible Officer will normally be the Academic Registrar.

- Where requests are for events to be held through the auspices of the Students'
 Union, unless otherwise determined by the Trustees, the Responsible officer
 will normally be the Chief Executive Officer of the Students' Union.
- 6.4. The Reviewing Officer will normally be the Chief Operating Officer of the University.

7. Role of the Responsible Officer

- 7.1. The Responsible Officer for the University will act in a risk-based and proportionate manner consonant with the desire, wherever possible, to enable events or meetings to proceed. In the context of this Code, the Responsible Officer will be entrusted with the duty to assess the implications of events formally referred to them and to act in accordance with the relevant legal responsibilities, including:
 - (a) the importance of academic freedom;
 - (b) the need to ensure that freedom of speech within the law is secured³;
 - (c) ; and
 - (f) the need to ensure the safety of all staff, students and other visitors especially where they might be exposed to public disorder, incitement to violence or hatred.

The *Responsible Officer* for the Students' Union will be entrusted to assess the implications of events formally referred to them and to act in accordance with the relevant responsibilities of the Students' Union.

8. Procedure: meetings, events and activities

- 8.1. It is not anticipated that prior approval of meetings will be required where external speakers are invited to lead or to participate the events and activities listed below, unless the external speaker has a controversial media profile or is from or represents the views of an organisation that is known to be controversial. If the individual or organisation they represent is of a political or campaigning nature then an external speaker request should be logged.
 - (a) normal teaching sessions
 - (b) scheduled academic timetabled events
 - (c) academic or administrative operational meetings
 - (d) careers events
 - (e) research seminars or public engagement/impact workshops that are linked to funded research projects
 - (f) alumni events
- 8.2. Subject to paragraph 8.1 above, the procedure to be followed whenever an event is planned involving speakers, participants or audiences from outside the University or Students' Union, is set out in Appendix A. The event could be venue-based, or organised using digital technology. The procedure should be commenced at the earliest opportunity and not later than 21 working days before

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³ See 2.1 and 2.3

the date of the meeting or event. If this deadline is not met, the University reserves the right to cancel the event.

8.3. Arrangements for meetings, events and other activities that are organised under the auspices of the Students' Union or other recognised student societies and held on Students' Union premises are normally regarded as the concern of the Students' Union as the body responsible for managing its own affairs. However, it is recognised by both parties that there is a need for the Students' Union to follow the provisions of this procedure. Meetings, events and other activities that are organised under the auspices of the Students' Union or other recognised student societies are managed through the Student's Union's own procedures, acknowledging that the provisions of this procedure must also be fully observed.

Where events are to be held on Students' Union premises, the *Responsible Officer* for the Students' Union will consult with the *Responsible Officer* for the University as required. In the event that the Students' Union is unable to host a proposed event or external speaker, the *Responsible Officer* for the Students' Union will consult with the *Responsible Officer* for the University to establish whether alternative arrangements can be made, consistent with this procedure and the University's legal responsibilities and obligations.

8.4. The *Principal Organiser* must undertake a self-assessment using the questions contained in Appendix B to determine whether further scrutiny or support from the University is required. The method for applying the self-assessment, and any internal authorisation that may be required within the University, is through the <u>Assist Portal</u>. All assessments for applications to events on University premises must be logged with the University through the <u>Assist Portal</u> or, if external to the University, to <u>academicservices@mmu.ac.uk</u>. The Students' Union has its own logging procedure available <u>here</u>.

If the *Principal Organiser* reasonably decides that there are no issues as to unlawful content or public order, the event can go ahead without any further deliberations in this respect, subject to the approval of the *Principal Organiser's* authorising manager⁴. It is anticipated that the vast majority of events organised will fall into this category. Where the *Principal Organiser* is a Head of Department or Professional Services Director, approval will be required from the Faculty Pro-Vice Chancellor or Chief Operating Officer⁵.

8.5. If, through the self-assessment a *Principal Organiser* identifies that further scrutiny is required, the venue can be provisionally booked. However, the *Principal Organiser* must discuss the event with their authorising manager and refer the matter to the *Responsible Officer* to determine how best concerns or risks in respect of unlawful content or public order may be mitigated. The *Principal Organiser* may propose measures of mitigation, but the final decision will rest with the *Responsible Officer* who will decide what conditions, if any, are required. The method for logging such requests is through the <u>Assist Portal</u> or , if external to the University, at <u>academicservices@mmu.ac.uk</u>.

⁴ For the Students' Union, this will be a senior member of staff who reports directly to the Chief Executive Officer.

⁵ For the purposes of this Code, a Professional Services Director is a senior member of staff who reports directly to the University's Chief Operating Officer.

- 8.6. In exceptional circumstances, where it is anticipated that the risks posed by an event cannot be mitigated by reasonable and proportionate measures, the *Responsible Officer* has the right to refuse permission for the event to proceed, or cancel the event even after initial authorisation.
- 8.7. As required by section 12 of the Terrorism Act 2000, the University and the Students' Union will not give permission to hold a meeting or event where it is known that:
 - (a) the proposed speaker belongs to, or professes to belong to, a proscribed organization; or
 - (b) the proposed speaker will use the event to support, or to further the activities of, a proscribed organization.

9. Appeal

9.1. If an organiser, or any member of the University's staff or student body has any concerns about a meeting or event or is dissatisfied with the decision of the Responsible Officer, they may write to the Reviewing Officer setting out clear reasons for their concerns and requesting a reconsideration of the decision. The appeal should be lodged at least 7 working days prior to the date that the event is due to take place. Unless otherwise determined, the Reviewing Officer will normally be the Chief Operating Officer⁶.

Where the event relates to a particularly controversial speaker or sensitive subject matter, the decision may require longer than 7 working days to arrive at a conclusive decision. It may therefore be necessary to postpone the event pending a decision by the Reviewing Officer. The decision of the Reviewing Officer will be final.

10. Record Keeping

10.1. The decision of the Reviewing Officer should be documented within an appropriate record. Records of decisions will be kept by Academic Services for a period of 10 years from the date of the decision, as documented within the University's Retention and Disposal Schedule. The information relating to external speaker and event requests will be provided annually to the Office for Students in the Prevent annual accountability return. The Office for Students has the right to conduct audit visits to the University, requiring the information relating to the annual accountability return to be retained.

11. The Conduct of Meetings

11.1. It is expected that all participants in events organised within, or under the name of the University, will observe good order and behave in a manner consonant with the values outlined in this Code of Practice, and in particular, by respecting the right to freedom of speech within the law, and by treating others with respect, courtesy and consideration.

⁶ In the event that the Chief Operating Officer has requested the speaker, Vice-Chancellor will nominate another senior officer to undertake the role of Reviewing Officer.

- 11.2. A Chair shall be identified for every meeting or event that is approved under the procedure in this Code of Practice. Once the meeting or event is under way, the Chair shall decide whether conditions are such that the proceedings can continue or must be terminated. However, in the event of a serious disorder or threat to the safety of persons or property, an officer duly authorised by the Responsible Officer shall have the power to terminate the activity and if necessary to summon assistance from the police. The duly authorised officer shall normally be either the Head or the Deputy Head of Security.
- 11.3. A failure on the part of University staff or students to adhere to the terms of this policy will represent a disciplinary offence and action may be taken, accordingly, under the respective disciplinary procedures.
- 11.4. The University and the Students' Union reserve the right to exclude from their premises, or meetings hosted in its name, members of the general public who are deemed to have breached the terms or ethos of this policy.

12. Withdrawal of Bookings

12.1. The University and the Students' Union reserve the right to withdraw an event booking, if they receive further information at any time that leads either body to believe that the law will be infringed or if they believe conditions for the event will not be met.

13. Complaints relating to this Code of Practice

13.1. If any member of the University community has a complaint relating to their right to free speech, academic freedom or the interpretation or implementation of this Code of Practice, the University encourages them to raise the matter with the University directly. Alternatively, they may also refer the matter to the Office for Students (OfS). The OfS operates a free speech complaints scheme. Under that scheme, the OfS can review complaints about free speech from members, students, staff and applicants for academic posts and (actual or invited) visiting speakers. Information about the complaints that the OfS can review is available on its website Home - Office for Students.

CODE OF PRACTICE ON FREEDOM OF SPEECH

APPENDIX A: PROCEDURE FOR THE BOOKING AND CONDUCT OF EVENTS

This procedure is for booking external speaker events on Manchester Metropolitan University premises. To book events at the MMUSU, please refer to their website.

1. Introduction

- 1.1 It is the responsibility of the *Principal Organiser* to ensure that a completed "Freedom of Speech Speaker Request Form", located on the University's website and intranet is submitted via the Cherwell Assist Portal or, if external to the University, to academicservices@mmu.ac.uk at least 21 working days in advance of the event. If this deadline is not met, the University reserves the right to cancel the event.
- 1.2 Where the *Principal Organiser* or those responsible for taking the bookings believe that the event may not meet the requirements of the duty of care to speakers and attendees so that all can enter, deliver speeches, listen to speeches and/or participate in events safely without the probability of a threat to public order, then this must be referred to the *Responsible Officer* for consideration. The *Principal Organiser* can recommend to the *Responsible Officer* what measures might be considered by way of risk mitigation.
- 1.3 Mitigation might include:
 - Ticketing and/or restricting numbers
 - Changing the time, date, length or venue of the event
 - Limiting admission to University staff and students and/or by named guest list only
 - Checking identification of those attending
 - Provision of stewards/ additional security
 - Attendance by a senior member of staff
 - Copy of any speech to be approved in advance
 - Providing opportunity to debate or challenge a view that is being promoted
 - Imposing restrictions on the recording of an event and/or controlling the use of social media
 - Imposing restrictions on items that might be brought into the venue.
- 1.4 On receipt of the referral, the *Responsible Officer* shall give a written statement (normally via email) within ten working days, to the *Principal Organiser*. The statement shall either grant or withhold permission for the use of University premises for the proposed event.
- 1.5 Permission to hold the event may be subject to conditions the *Responsible Officer* considers reasonably necessary to ensure the discharge of the University's statutory responsibilities in regards to mutual tolerance, intellectual freedom and freedom of expression.

2. The arrangements for booking University premises for events is as follows:

- i) No booking will be confirmed without a named *Principal Organiser*, who is required to be present at the event, and without all of the relevant information being provided.
- ii) Where meetings are determined by the *Responsible Officer* as not meeting the requirements of Duty of Care as defined above the booking may be subject to further conditions.
- iii) Where such meetings are held by the Student's Union or one of its clubs or societies, the booking may be subject to the condition that a member of staff of the Students' Union shall be required to attend and/or act as *Principal Organiser*.

3. Risk Analysis

- 3.1 The *Principal Organiser* is responsible for an initial assessment of the risk of each event, in particular with regards to controversial speakers, crowd control and the risk of protests. The risk assessment will indicate whether any further measures should be put in place to ensure that the event can go ahead, having due regard for safety and the requirements of the law.
- 3.2 This will also consider any requirements of the University to comply with the Prevent legislation and duties. The University uses a 'traffic light' indicator to grade an event for security purposes along the following lines:
 - i) Green: non-controversial with no protests expected. No further action is required.
 - ii) Amber: regarded as medium with controversial speakers and/or the risk of protests likely to be managed through mitigation (see section 1 above). Monitor and escalate to red if appropriate.
 - iii) Red: highly controversial; student or outside protest likely.

4. The Freedom of Speech Speaker Request Form

- 4.1 The Freedom of Speech Speaker Request Form contains a series of questions to assist the *Principal Organiser* to assess whether the event is Green, Amber or Red.
- 4.2 Where an event is assessed as Green, the event can proceed, subject to the approval of the relevant senior member of staff without requirement for further consideration.
- 4.3 Where an event is assessed as Amber or Red, the submission of the Freedom of Speech Event form affords the *Responsible Officer*, in consultation with the relevant Head of Department or other senior officer, the *Principal Organiser*, and the Head of Security to consider factors such as: cost, location, publicity, security, stewarding and entrance arrangements needed, as well as implications on freedom of speech. This assessment may also involve consultations with the organisers, speakers or their representatives, the police, neighbouring institutions that may be impacted by the event and any other institutions that have staged a similar event.

- 4.4 For events that are assessed as Red or Amber, briefing will be given to the Chair by the Responsible Officer and/or the Head of Security.
- 4.5 Where an event is assessed as Red, the duly authorised officer (normally the Head or Deputy Head of Security) would be expected to attend the event. Where an event is assessed as Amber, the duly authorised officer would be expected to be available for immediate consultation by the Chair, should a public order situation develop.
- 4.6 Additional speakers may be required to sit on the panel to balance the views of a controversial speaker.
- 4.7 The *Responsible Officer* may carry out due diligence checks on external speakers, including online research, discussions with other institutions or external organisations as required.
- 4.8 Press or media companies should be managed in conjunction with the University's Communications and Marketing department.

5. Approval of an Event

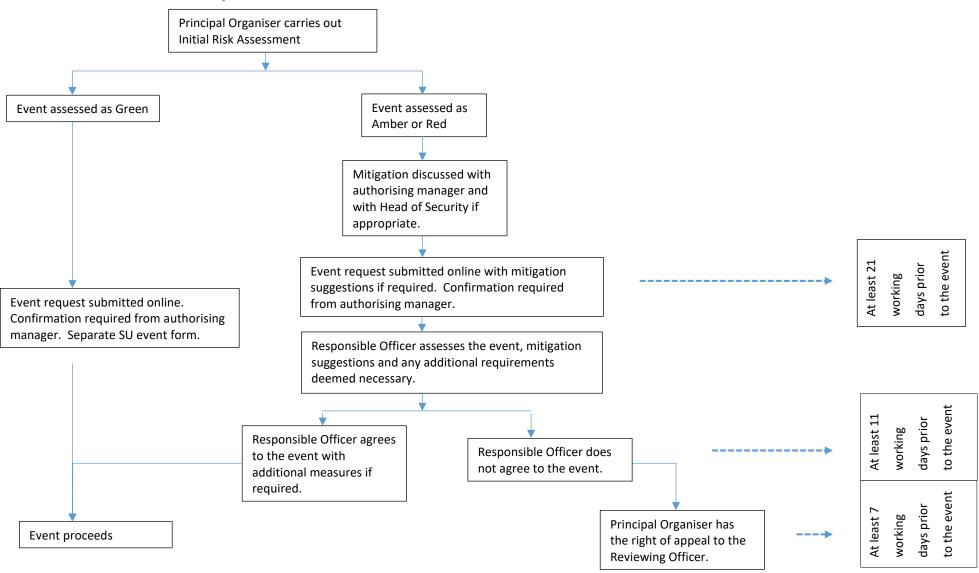
- 5.1 The default position is that events should be approved if at all possible. An event will not be approved to proceed if:
 - there are reasonable grounds for believing that the speaker or other persons at the event will incite others to commit criminal acts, such as acts of violence and/or the incitement of racial or religious hatred;
 - ii) there are reasonable grounds for believing that opinions may be expressed in a way that is contrary to English law, or which infringe the human rights of others;
 - the event appears to be in direct support of an organisation that is unlawful or proscribed; (For Proscribed Terrorist Groups see https://www.gov.uk/government/publications/proscribed-terror-groups-organisations--2)
 - iv) the event may cause a breach of the Terrorism Act or the Counter-Terrorism & Security Act including the encouragement or inducement to, or glorification of the commission, preparation or instigation of acts of terrorism or disseminating terrorist publications;
 - v) the event is likely to contravene health and safety legislation, or cause a breach of the peace, or cause a public order offence;
 - vi) the scale or nature of the event is demonstrably unsuitable for the University's facilities or is likely to disrupt its other activities;
 - vii) staff, students or other internal or external groups or individuals have misled the University about the nature of the event by falsifying or concealing information;
 - viii) proper procedures have not been followed;
 - ix) or if it is thought that the event may attract numbers in excess of the room/lecture theatre capacity
- 5.2 If there are concerns, the *Responsible Officer* may either decide that the event cannot proceed or may permit it to proceed but with special conditions which must be followed. Such conditions will be conveyed to the *Principal Organiser*.

6. Appeal

- 6.1 If an organiser, or any member of the University's staff or student body, has any concerns about a meeting or event or is dissatisfied with the decision of the *Responsible Officer*, they may write to the *Reviewing Officer* setting out clear reasons for their concerns and requesting a reconsideration of the decision. The appeal should be lodged at least 7 working days prior to the date of that the event is due to take place. Unless otherwise determined, the *Reviewing Officer* will normally be the Chief Operating Officer.⁷
- Where the event relates to a particularly controversial speaker or sensitive subject matter, the decision may require longer than 7 working days to arrive at a conclusive decision. It may therefore be necessary to postpone the event pending a decision by the *Reviewing Officer*. The decision of the *Reviewing Officer* will be final.
- **7.** The University reserves the right to withdraw an event booking, if it receives further information at any time that leads it to believe that the law will be infringed or if it believes conditions for the event will not be met.

⁷ In the event that the Chief Operating Officer has requested the speaker, the Vice-Chancellor will nominate another senior officer to undertake the role of Reviewing Officer.

Manchester Metropolitan University Consideration of "Freedom of Speech" Flowchart



CODE OF PRACTICE ON FREEDOM OF SPEECH

APPENDIX B: FREEDOM OF SPEECH SPEAKER REQUEST FORM

The form is provided as an appendix to the Code of Practice on Freedom of Speech to ensure that all information relating to the process for considering requests for approval of external speakers are co-located. **The primary route for applications is via the Cherwell Assist Portal** and is presented here for applicants who are unable to use that facility. It is available electronically on the University's external-facing website and staff intranet. Where applications cannot be made through the Cherwell Assist Portal, they should be submitted electronically to academicservices@mmu.ac.uk.

The *Principal Organiser* must make themselves sufficiently aware of the speaker's background and reputation to be able to take a considered view as to whether it is appropriate for the University to host the proposed event. The primary consideration is whether the event can be managed safely and whether any additional measures should be put in place to enable the event to go ahead. The following questions will enable the *Principal Organiser* to consider how to mitigate any risks the speaker's attendance might bring, and ensure that the event can be managed appropriately.

A Principal Organiser can be:

- a named staff member of the Students' Union;
- a University staff member on a contract of 0.2 FTE or greater;
- a representative of an external organisation booking events through the Conference Office.

SECTION 1: ABOUT YOU, THE PRINCIPAL ORGANISER

Name:	
Your job title/position in the University or	
the Students' Union:	
Telephone:	
E-mail:	
Name and e-mail of authorising manager*:	Name:
For Academic staff, this is your Head of	E-mail:
Department; For Professional Services Staff, this is your	
Head of Directorate	
For students, this is your President of the	
Students' Union and the Chief Executive Officer	
of the Students' Union	

SECTION 2: ABOUT THE SPEAKER

Name:	

What organisation does the speaker represent or speak for?	
Has the speaker spoken at the University or Students' Union previously?	Yes No
If Yes, please provide details.	

SECTION 3: LEGAL CONSIDERATIONS

	No	Yes
Are there any concerns about unlawful content or content that might encourage terrorism or violent extremism? If you are unsure, please e-mail preventduty@mmu.ac.uk for advice.		
Are they representing an organisation proscribed by the UK Government? _ https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations2		
Are they likely to breach UK laws on Hate Speech? https://www.equalityhumanrights.com/en/publication-download/freedom-expression-guide-higher-education-providers-and-students-unions-england		
Are they likely to raise concerns under the Prevent duty guidance in terms of encouraging violent extremism or terrorism, or drawing people into terrorism? https://www.gov.uk/government/publications/prevent-duty-guidance		
Under the Equality Act 2010, gender segregation at meetings and events is not normally permissible. Please indicate whether the proposed meeting, event or activity is to be segregated by gender.		
[Note: if the answer is Yes, the Principal Organiser should consult with the University's Legal Department to establish whether a sufficient basis exists for exemption from the Act.]		

SECTION 4: ABOUT THE EVENT

Could there be a public order issue?

Concern about public order issues does not automatically block an event taking place, but it is important to seek advice. For example:

	No	Yes
Is the subject of their talk or the organisation they represent likely to mobilise significant opposition such that there might be a risk to safety of the public or members of the University/Student Union community?		
Is there any evidence that this has been the case on other occasions?		
Does the speaker, or the organisation they represent, have a controversial profile in the media?		
Is the event likely to attract a heightened media interest?		
Is the event likely to attract unusual interest or unusually large numbers?		

At the end of the self-assessment process the *Principal Organiser* should be able to answer Yes or No to these questions.

NEXT STEPS:

Green Events:

Where all questions in Sections 3 and 4 are "No", the event is assessed as Green. The next steps are:

- 1. The Principal Organiser should submit this form (electronically) to their respective authorising manager.
- 2. The authorising manager will normally approve the event via the Cherwell Assist Portal. However, where this is not possible, they should submit the form to academicservices@mmu.ac.uk for record keeping purposes. The form should be submitted at least 21 days prior to the event.⁸
- 3. The event will normally proceed without further scrutiny.9

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⁸ In the event that the authorising manager does not support the application, the Principal Organiser may still submit the request to <u>academicservices@mmu.ac.uk</u> noting that authorisation has not been granted. Consideration will be given by the Reviewing Officer under the principle of freedom of speech.

⁹ The University reserves the right to review all submissions and may require further consideration of additional measures and mitigation to ensure adherence to the law and to the safety of event attendees.

Amber or Red Events

Where any question in Section 3 and 4 is answered "Yes", the event is assessed as Amber or Red. The next steps are:

- 1. The Principal Organiser will discuss the event with their relevant Head of Department and with the Head of Security if appropriate.
- 2. The Principal Organiser will consider additional measures and mitigation, in consultation with the Authorising Manager and the Head of Security.

SECTION 5: ADDITIONAL MEASURES AND MITIGATION

Would any or all of the following measures be suitable to enable the event to proceed? If so, please state how you propose to arrange this:

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Proposal	Yes	No	If yes, how?
Presence of the Head of	'	_	
Security or Deputy Head of			
Security			
Ticketing and/or restricting		П	
numbers		<u> </u>	
Changing the time, date, length			
or venue of the event			
Limiting admission to the			
University staff and students			
and/or by named guest list only			
Checking identification of those			
attending			
Provision of stewards/			
additional security			
Attendance by a senior member			
of staff			
Copy of any speech to be			
approved in advance			
Providing opportunity to debate	<u></u>		
or challenge a view that is being			
promoted			
Imposing restrictions on the			
recording of an event and/or			
controlling the use of social			
media			
Imposing restrictions on items			
that might be brought into the			
venue			

SECTION 6: AMBER/RED MITIGATION NEXT STEPS

- 1. Once you have considered all aspects of mitigation you should submit this form to your authorising manager with mitigation suggestions where appropriate. You should submit the form at least 21 working days prior to the event.
- 2. The authorising manager would confirm support for the event and submit the form to academicservices@mmu.ac.uk. ⁸ The form should be submitted at least 21 days prior to the event. This is in order for due consideration for mitigation and relevant investigations to be undertaken should this be required. ¹⁰
- 3. The Responsible Officer will then consider the event.
- 4. Should the Responsible Officer agree to the event proceeding, this may be subject to additional measures being made. You should expect to receive a response from the Responsible Officer at least 11 working days prior to the event.
- 5. Should the Responsible Officer not agree to the event proceeding, the Principal Organiser will normally be informed at least 11 working days prior to the scheduled event date. Should you disagree with the decision, you have the right of appeal to the Reviewing Officer, who is normally the Chief Operating Officer.

SECTION 7: APPEAL

- 1. If an organiser, or any member of the University's staff or student body, has any concerns about a meeting or event or is dissatisfied with the decision of the *Responsible Officer*, they may write to the *Reviewing Officer* setting out clear reasons for their concerns and requesting a reconsideration of the decision. The appeal should be lodged at least 7 working days prior to the date that the event is due to take place. Unless otherwise determined, the *Reviewing Officer* will normally be the Chief Operating Officer¹¹.
- 2. Where the event relates to a particularly controversial speaker or sensitive subject matter, the decision may require longer than 7 working days to arrive at a conclusive decision. It may therefore be necessary to postpone the event pending a decision by the Reviewing Officer. The decision of the Reviewing Officer will be final.

¹⁰ If the form is submitted within 21 working days prior to the event, the University reserves the right to postpone or cancel the event. There may, for example, be health and safety risks or potential breaches of the Law that cannot be addressed in time to ensure due regard to the safety of attendees or to the law.

¹¹ In the event that the Chief Operating Officer has requested the speaker, the Vice-Chancellor will nominate another senior officer to undertake the role of Reviewing Officer.