

The London College External Speaker Approval Procedure

February 2018

(Updated August 2018)

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A. REFERRAL CHECKLIST

To be followed by:

Registry

Marketing team

Event organisers in the Students' Council

Referral Process

Please complete the following Checklist when considering any event booking request:

1. Does the organiser wish to invite an external speaker to the event? | YES | NO

If 'yes' please ask the event organiser what the topic of the external speaker's talk will be.

2. Is the speaker's topic expected/reasonably foreseen to raise controversial issues which may risk infringement of the College's Code of Practice on Freedom of Speech? | YES | NO

If 'yes' inform the event organiser that they must complete the External Speaker Approval application process.

Notification Slip

Name of Event:	
Date of Event:	
Location of Event:	
Reason for referral to External Speaker Approval Procedure	
Referred by	Name:
	Tel:

1.0 Introduction and Scope

1.1 The College has a duty to secure academic freedom, in accordance with the Education Reform Act 1988, which must be balanced with the duty of care to staff, students and visitors. Whilst most speakers are not controversial, some may express contentious, inflammatory or offensive views. The purpose of this External Speaker Procedure is to protect the rights and academic freedoms of students, staff and visitors, and to ensure that this is balanced with statutory obligations.

1.2 This Procedure applies to:

- Any event that involves an external speaker to be hosted on College premises or hosted by the College on other premises.
- External speakers invited by Course Leaders to the College under the remit of the normal academic curriculum.

1.3 All such events involving external speakers, whether arranged for internal groups or for external clients, must comply with the College's statutory obligations, as set out in the Freedom of Speech Code of Practice and this Procedure.

1.4 Events might include, but are not limited to, public lectures, student society events, meetings, debates and conferences.

1.5 Formal approval by the College must be obtained, in advance, for any event to be held on the College's premises or to be hosted by the College, **where it is expected, or reasonably foreseeable, that the event will raise controversial issues which may risk infringement of or non-compliance with the College's Code of Practice on Freedom of Speech.**

1.6 Examples include, but are not limited to, meetings or gatherings where the topics to be covered include social, political or religious issues which are known or can be reasonably expected to invoke fiercely opposing views.

1.7 Key legislative issues that are relevant to this Procedure are:

- Criminal legislation, including the Counter Terrorism and Security Act 2015
- Education (No.2) Act 1986 & Education Reform Act 1988 – Academic Freedom
- Human Rights Act 1998
- Equality Act 2010
- Data Protection Act 1998
- Charities Act 2011
- Other civil legislation

1.8 External Speakers Invited as Part of the Academic Curriculum

1.9 Where an external speaker is invited to be involved in a College event under the remit of the normal academic curriculum, either for teaching and research purposes

1.10 Course Leaders must keep a local record of all external speakers that are invited to be involved in an event under the remit of the normal academic curriculum.

1.11 Where it is expected, or reasonably foreseeable, that the external speaker will raise controversial issues which may risk infringement of or non-compliance with the College's Code of Practice on Freedom of Speech, then the event organiser must seek approval of the external speaker in advance of the event through the External Speaker Approval Procedure, outlined below (annexe A).

2.0 External Speakers' Approval Procedure: Key Roles and Responsibilities

2.1 Designated Officer

2.2 The Designated Officer oversees the External Speaker Approval Procedure, conducting an initial risk assessment, referral to the Approvals Panel as necessary and is responsible for recording and communicating speaker approval decisions. The Designated Officer role is the Principal.

2.3 Event Organiser/ Liaison Officer

2.4 The Event Organiser must be a current member of College staff or a current student. If not, a suitable Liaison Officer will be appointed who can ensure that the responsibilities of the Event Organiser, and this Procedure, are complied with at all

2.5 The Event Organiser shall, so far as it is reasonably practicable, ensure that both the audience and any speaker act in accordance with the law during the event and that the Code of Practice is observed. In the case of unlawful conduct or any failure to observe the Code of Practice, the Event Organiser is required to give appropriate warnings and, in the case of a continuing lack of order, either to require the withdrawal or removal of persons concerned by security personnel or to bring the meeting to a close.

2.6 The Event Organiser shall ensure that nothing in the preparation for or conduct of the event involving the external speaker infringes criminal or civil law.

2.7 The Event Organiser (if not a member of the College) shall be responsible for meeting any costs involved in organising and holding the event, even if the event is cancelled/not permitted because of the application of this Procedure.

2.8 All Event Organisers are required to sign the Approval of an External Speaker Application Form indicating that they have read the College's Freedom of Speech Code of Practice and confirm that they will ensure their event speaker will adhere to the Code. Where an Event Organiser refuses to sign the form, the College will not permit

the event to take place on College premises, nor on premises with an association with the College.

2.9 In the case of any doubt as to whether a proposed external speaker might require approval under this procedure, the Event Organiser shall consult the Designated Officer at the earliest opportunity so that the correct procedures can be followed.

2.10 Following confirmation that the proposed external speaker has been formally approved, the Event Organiser shall be responsible for providing evidence of the approval to the room booking/conferencing and events staff for the event to proceed on College premises.

3.0 Stage 1: Submission of Request

3.1 To seek formal approval for an external speaker, the Event Organiser must complete the Approval of an External Speaker Application Form found on College web site (or in hard copy).

3.2 Following completion of the Form, it should be submitted to the Designated Officer for the approval procedure at least **six weeks** prior to the event taking place to allow sufficient time for consideration of the request.

3.3 If any of the information submitted on the Approval of an External Speaker: Application Form changes prior to the event then the Designated Officer **must** be notified by phone or email.

4.0 Stage 2: Initial Risk Assessment

4.1 On receipt of the Approval of an External Speaker: Application Form, the Designated Officer shall review the information on the Form and conduct an initial risk assessment to determine whether the proposed event would be either: low risk or medium/high risk.

4.2 The initial risk assessment conducted by the Designated Officer may include:

- An internet search on the external speaker and the subject matter of the proposed event;
- A search on social media on the external speaker
- Consultation with appropriate academic staff or staff within professional services;
- Consultation with external parties, for example: the Police, the Regional Prevent Lead,
officers at other universities;

4.3 Low Risk Events

4.4 If the Designated Officer determines that the event proposal is low risk, the event involving the external speaker should be approved and the decision communicated to the Event Organiser, as quickly as circumstances allow. The decision and the information used to inform the decision (including links to relevant websites/social media) are recorded by the Designated Officer on the Central External Speakers Database.

4.5 Medium/ High Risk Events

4.6 If the Designated Officer determines that the event involving the external speaker is medium/high risk, then the Designated Officer shall convene the External Speakers' Approval Panel.

5.0 Stage 3: External Speakers' Approval Panel

5.1 The External Speakers' Approval Panel can be convened to meet either face-to-face or by correspondence depending on urgency.

5.2 The External Speakers' Approval Panel will have the following membership:

- Principal (Chair)
- Managing Director
- Head of Student Support;

5.3 The Designated Officer will gather intelligence on the proposed external speaker and subject matter of the event. In addition to the initial investigations undertaken in 4.2, this will include:

- a review of the proposed content of the speech if this is known
- a check as to whether the speaker is associated with an organisation on Home Office's list of proscribed groups and organisations,
- if necessary consulting any relevant external parties
- completion of a formal risk assessment if deemed necessary

5.4 In determining whether to approve an external speaker to be involved in an event on the College's premises, consideration shall be given to:

- The outcomes of the intelligence gathered
- The safety of persons attending the event and persons on the College's premises who might foreseeably be put at risk;
- The security of the College's premises;
- The reputation of the College;

5.5 The Panel shall review the gathered intelligence and decide whether the external speaker is either:

- Approved, or
- Approved with Conditions, or
- Refused

5.6 Reasonable grounds for refusal include, but are not limited to, that the external speaker may:

- incite those attending to commit a criminal act;
- lead to the unlawful expression of views for example, using threatening or abusive language or behaviour or causing incitement to hatred or violence;
- be in direct support of an organisation which is proscribed or whose aims and objectives are illegal;
- be likely to give rise to a breach of the peace or other public disorder that disrupts social and community harmony; or
- undermine the College's reputation or its values or compromise its ability to comply with its legal and regulatory obligations as a charity and as a higher education institution.

5.7 Where an external speaker is approved by the Panel with conditions imposed, examples of such conditions include, but are not limited to, the following examples:

- Provision of a transcript of the speaker's talk to the Designated Officer in advance.
- Appointment of an experienced Chair for the event, who has the authority to terminate the event should there be a breach of this Procedure or the Freedom of Speech Code of Practice;
- Appointment of a member of College staff to be a note-taker at the event;
- Inviting a speaker with opposing views to ensure that discussion is balanced;
- Implementing specific conditions for the arrival, departure and itinerary of the external speaker.

5.8 The Designated Officer shall provide written confirmation of the decision to the Event Organiser and/or Liaison Officer where applicable, as quickly as circumstances allow. The decision will be "Approved", "Approved with Conditions" or "Refused".

5.9 Where the Event is "Refused" the decision will also be communicated to the Event Organiser and/or Liaison Officer, along with information about how to appeal the decision.

5.10 Where "Approved with Conditions", the Event Organiser will provide details of how the conditions will be met before final approval can be given.

5.11 The Panel's decision and the information used to inform the decision (including links to relevant websites/social media) will be recorded by the Designated Officer on the Central External Speakers Database.

6.0 Objections to External Speakers Raised by Stakeholders

6.1 Should an internal or external stakeholder submit a complaint or raise an objection about an external speaker that has been approved via this process, in advance of an event taking place, then the Designated Officer shall re-investigate and thereafter decide to continue with the event, cancel the event, or refer the decision to the Panel.

7.0 Appeal

7.1 If the application is "Refused", the Event Organiser shall be entitled to submit an appeal against the decision.

7.2 An appeal must be submitted in writing to the Designated Officer, stating the reasons for the appeal and accompanied by the original application form.

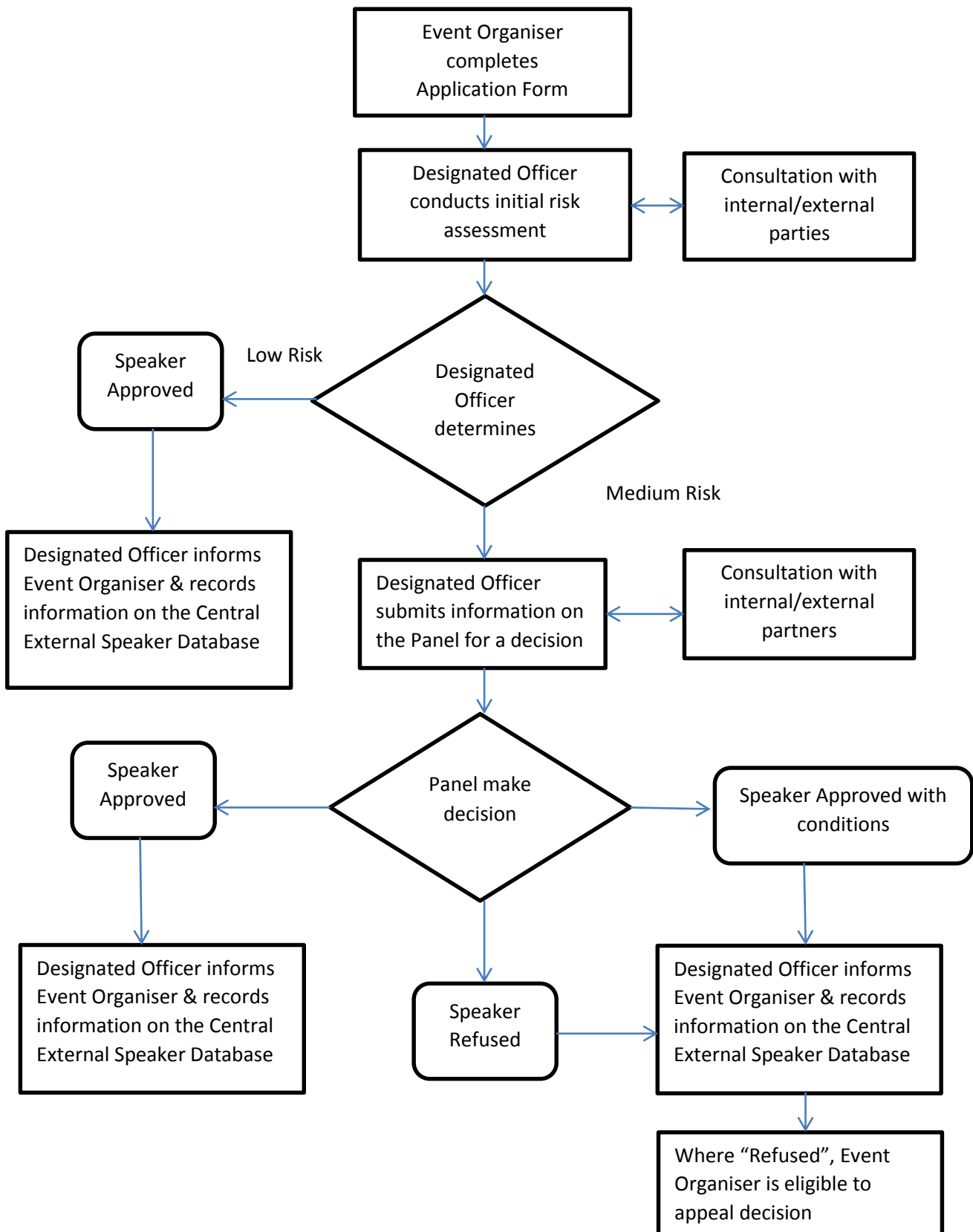
7.3 The decisions of the Principal hearing the appeal, having reviewed the information considered by the Approval Panel, shall be final.

8.0 Implementation and Review

8.1 The Designated Officer shall be responsible for overseeing implementation, in consultation with the Panel, and ensuring that the Procedure remains fit for purpose at least annually, with a full review required at least every three years.

8.2 The Prevent Duty: The External Speaker Procedure and the Approval of an External Speaker: Application Form have been reviewed (August 2018) to reflect the statutory 'Revised Prevent Duty Guidance for England and Wales' and 'Prevent Duty Guidance for Higher Education Institutions in England and Wales'.

Annex A: APPLICATION & APPROVAL PROCESS



Speaker: Application Form

Annex B: Approval of an External Speaker Application Form

Please complete this form for all events covered by the Freedom of Speech Code of Practice and External Speaker Approval Procedure:

Event Title:			
Event Date:		Start Time:	
Name of Event Organiser:			
Event Organiser`s contact details:			
	Tel:		Email:
Is this an external organiser? i.e. not a member of staff or student	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, a Liaison Officer will be appointed by the Designated Officer, in line with the External Speaker procedure		
Name of Liaison Officer:			
Note: If more than one speaker, please complete a separate form for each speaker			
Speakers Name :			
Is the speaker known by any other name?			
Speaker`s Organisation: <i>(include full title & website URL)</i>			
Speaker`s contact details: <i>(Address)</i>			
	Tel:		Email:
Title of talk:			
Subject matter:			
Language the talk will be delivered in:			
Does the event have any controversial subjects?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	If yes, provide date and details:		
Arrival date:		Time:	
Departure date:		Time:	
Has the speaker spoken at The London College previously?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	If yes, provide date and details:		
Has the speaker been refused to speak publicly or at any	Yes <input type="checkbox"/> No <input type="checkbox"/>		

educational establishment before?	If yes, provide date and details:		
Have any previous speeches by this speaker generated media interest, either at The London College or at another establishment?			
Who is the event open to?	<input type="checkbox"/> Staff <input type="checkbox"/> Students <input type="checkbox"/> Other members of the College <input type="checkbox"/> General public <input type="checkbox"/> Restricted group/society		
Expected number of attendees:		How many of these are likely to be external to the College?	
Is the event being sponsored?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
	If yes, provide date and details:		
How will the event be advertised?	<input type="checkbox"/> Email <input type="checkbox"/> Social Media <input type="checkbox"/> Leaflet <input type="checkbox"/> Posters <input type="checkbox"/> Other <input type="checkbox"/> No Advertising If other, please provide details:		
Are there any other details that should be noted?			
ORGANISER TO READ AND SIGN: I have read the College`s Freedom of Speech: Code of Practice and External Speakers Procedure and can confirm that this event and its speakers will adhere to the principles of the code.			
Signed:		Date:	

Completed forms should be emailed to:

Mike Scott

m.scott@lcuck.ac.uk

