

Events and Speakers Procedure

A. Introduction

1. Corndel College London (CCL) is committed to securing academic freedom and freedom of speech within the law for all members of its community, including staff, students, and visitors (including visiting speakers). In accordance with its statutory duties, CCL shall take all reasonably practicable steps to ensure that lawful speech is not inhibited or restricted on its premises or through its activities. This includes ensuring that individuals are not denied access to premises¹ or facilities (including in online virtual environments) based on the content or viewpoint of their lawful expression.
2. The safeguarding of opportunities for lawful, open, and robust discussion is fundamental to the academic mission of CCL. The institution welcomes the ability of its community members to freely express as well as hold ideas and opinions, some of which may be controversial, provided that such expressions, ideas and/or opinions are within the law. The invitation of speakers whether internal or external is an essential component of a dynamic and intellectually stimulating higher education environment.

B. Approach to Meetings, Event and External Speakers

3. CCL adopts a presumption in favour of permitting all meetings, events, and activities, including those involving internal and/or external speakers. CCL will not decline an event solely on the basis of the views or beliefs held by the organisers or participants, except in circumstances where:
 - the content is likely to involve unlawful speech;
 - the event would result in a breach of other legal obligations;
 - the event poses a real and substantial risk to physical safety or would significantly disrupt the essential operations of CCL.

¹ Premises includes all land, buildings, facilities, and other property in the possession of, or owned, leased, used, supervised or controlled by the university, college or students' union.

4. Where potential risks are identified, CCL will engage constructively with event organisers to explore appropriate measures to mitigate those risks. Any restrictions imposed must be demonstrably necessary, proportionate, and consistent with the institution's legal obligations, including those under the Human Rights Act 1998 and the Higher Education (Freedom of Speech) Act 2023.
5. Organisers are responsible for submitting full and accurate details of any proposed meeting, event, or activity, including information about proposed speakers, within the specified timeframe. Please see **Section C** below. Please also refer to CCL's Code of Practice for Freedom of Speech.
6. Failure to provide the required information may result in delays in processing the Event or Speaker Request Form and may require the rescheduling of the proposed event.

C. Procedure for Events and External Speakers

7. All events, meetings, and activities held on CCL's premises including those conducted online or at external venues under the CCL brand must be authorised in accordance with CCL's Code of Practice for Freedom of Speech and associated institutional procedures. This includes, where applicable, the completion of the Events Request Form and the External Speaker Request Form.
8. Organisers are required to submit the Events Request Form no fewer than **20 CCL working days** prior to the proposed date of the event. Access the Events Request Form [HERE](#).
9. Where an event involves one or more internal or external speakers, the organiser must also complete the External Speaker Request Form within the same timeframe. Access the Speaker Request Form [HERE](#).
10. Any physical or online collection of funds (including charitable donations) associated with a meeting, event, or activity must receive prior authorisation from the Academic Registrar or their nominee. Such collections are deemed to constitute an event and must therefore be submitted via the Events Request Form in accordance with the timeline outlined in **paragraph 8** above.

- 11.** Organisers are responsible for ensuring that all required information is submitted in a timely and complete manner to enable CCL to assess any potential risks and determine appropriate mitigation measures. Events and speakers must not be advertised through any medium, including online platforms until formal approval has been granted by CCL.
- 12.** The Assistant Registrar or their nominee is responsible for reviewing all Event and Speaker Requests. In doing so, they will assess any associated risks and may impose conditions on approval to ensure the event proceeds in a manner consistent with CCL's legal obligations including those set out in the Code of Practice for Freedom of Speech and institutional values.
- 13.** Organisers will be notified of the outcome of their request typically within **10 CCL working days** from the date of receipt of the completed Events Request Form and/or External Speaker Request Form. Where approval is granted subject to conditions, these will be clearly communicated to the organiser at the same time.
- 14.** If the Assistant Registrar or their nominee considers that permission for a meeting, event or activity should be refused or delayed indefinitely, they will make a recommendation to the Academic Registrar or their nominee who will consider the Event and Speaker Request and decide whether such a delay is justified or whether to refuse permission.

D. Appealing Process for Event Request and/or Speakers Request Decision

- 15.** Organisers who are dissatisfied with the outcome of an Event Request and/or External Speaker Request may submit an appeal by writing to [**ace@cornel.com**](mailto:ace@cornel.com).
- 16.** An appeal may be submitted on one or more of the following grounds:
 - i. That there was a procedural irregularity in the decision-making process;
 - ii. That there is evidence of actual or perceived bias on the part of the decision-maker or their nominee;
 - iii. That the decision reached was unreasonable in the circumstances;
 - iv. That any condition attached to the approval of the event, meeting, or activity is disproportionate;
 - v. That new, material information has become available which, for valid reasons, could not have been provided at the time of the original request.

- 17.** Appeals must be submitted within **10 CCL working days** of the date on which the organiser was notified of the outcome. Appeals submitted after this deadline will not normally be considered unless the organiser can demonstrate valid grounds/good reason for the delay.
- 18.** Where an appeal is submitted, it may be necessary to postpone the initial proposed date of the event, meeting, or activity until the appeal has been fully considered.
- 19.** Appeals will be reviewed by the Academic Registrar or their nominee. The individual considering the appeal will not have been involved in the original decision. The appeal may be determined based on written documentation alone, or the reviewer may choose to meet with relevant parties to gather further information.
- 20.** The organiser will be informed of the outcome of the appeal within **10 CCL working days** of receipt of the appeal. The outcome of the appeal constitutes CCL's final decision in relation to the Event and/or Speaker Request.
- 21.** Where the organiser is a student, a Completion of Procedures (COP) letter will be issued alongside the outcome.

- **Additional Review the Outcome of an Appeal**

Students:

- 22.** If the organiser is a student and remains dissatisfied with the outcome of their appeal, they may be eligible to submit a complaint to the Office of the Independent Adjudicator for Higher Education (OIA). The OIA is an independent body established under the Higher Education Act 2004 to review unresolved student complaints. Further information, including eligibility criteria, is available at www.oiahe.org.uk.

Staff:

- 23.** If the organiser is a staff member, and remains dissatisfied with the outcome, they should raise a formal grievance under CCL's Staff Grievance Procedure, clearly stating the grounds for dissatisfaction and referencing any relevant aspects of the decision or appeal outcome.

E. Mitigating Risks Associated with Events and External Speakers

24. CCL operates on the presumption that all proposed meetings, events, and activities should proceed. Requests will only be refused in exceptional circumstances. Please refer to **paragraph 26** below.

25. The measures required to enable an event to proceed will be determined on a case-by-case basis, taking into account the specific risks identified. These may include, for example, the appointment of an independent chair to ensure balanced discussion, or the implementation of appropriate security arrangements to safeguard the health, safety, and wellbeing of the CCL community. Organisers are expected to fully cooperate with any measures deemed necessary by CCL to facilitate the safe and lawful delivery of the event.

26. CCL will not deny permission for an event to take place, nor prevent an invited speaker from participating, unless one or more of the following exceptional circumstances apply:

- i. The event is likely to result in the unlawful expression of views;
- ii. The event is likely to breach the Terrorism Act 2006, the Counterterrorism and Security Act 2015, or other applicable legislation;
- iii. The event supports, or involves a speaker affiliated with, a proscribed or unlawful organisation;
- iv. The event is likely to cause substantial disruption to the essential operations of the institution;
- v. The event presents a credible and significant threat to the health and safety of staff, students, attendees, or the public;
- vi. The event is unlawful, likely to result in unlawful conduct, or would cause CCL to breach its legal obligations.

27. Before refusing permission for an event to proceed, CCL will assess whether there are reasonably practicable steps that could be taken to enable the event to go ahead lawfully. This assessment will include consideration of whether any proposed restrictions or conditions are compatible with CCL's legal obligations, including those under the European Convention on Human Rights enshrined in UK Law by the Human Rights Act 1998 and whether the event poses a genuine and significant threat to physical safety or institutional operations.

28. CCL reserves the right to cancel or prohibit an event if the procedures outlined in this Code are not followed. Permission may also be withdrawn, or conditions imposed, if new information emerges that gives rise to any of the exceptional circumstances described above. Any such decision will be subject to approval by the Academic Registrar.

F. Expected Standards of Conduct for events and speakers

29. All staff, students, members, and external speakers are expected to uphold the principles of lawful freedom of speech and academic freedom in accordance with CCL's policies and procedures. These include, but are not limited to, the Staff Code of Conduct, Harassment and Sexual Misconduct Procedure, Student Conduct Procedure, and Student Regulations.

30. Freedom of speech is a protected right at CCL. All individuals are entitled to express their views and beliefs, provided such expression is lawful. In exercising this right, individuals are expected to do so in a respectful and responsible manner. Speech that constitutes personal attacks, harassment, or discrimination will not be tolerated under any circumstances.

31. Staff, students, members, and visitors must not engage in any conduct that obstructs or disrupts the organisation or delivery of a meeting, event, or activity including teaching or research on the basis of the topics to be discussed or the views or beliefs of those involved. This applies even where such views may be considered provocative or offensive by some.

32. Unless where legally justified under the Equality Act, all events, meetings, and activities must be conducted without any form of segregation.

33. Organisers, facilitators, and chairs of events are responsible for maintaining order and ensuring that:

- i. Orderly conduct is preserved throughout the event;
- ii. Dissenting views may be expressed, but not in a manner that disrupts proceedings or infringes on the rights of others to speak;
- iii. The conduct of all participants complies with the law;

- iv. Any serious disruption is reported immediately to **registrar@cornel.com**.

34. CCL recognises the importance of protest as a legitimate form of expression. However, protests must not obstruct or interfere with the lawful exercise of freedom of speech by others.

35. Any member of the institution, whether staff or student, who breaches the provisions of this Code may be subject to disciplinary action under the relevant institutional procedures.

36. Where conduct involves a breach of the law, CCL may cooperate with law enforcement authorities and/or initiate legal proceedings against any individual, including those who are not members of the institution.

G. Security Costs for Events

37. Under the provisions of the Higher Education (Freedom of Speech) Act 2023, CCL is required to ensure that, individuals or bodies are not typically required to bear the cost, whether in whole or in part, of security measures associated with the use of institutional premises for events, meetings, or activities. CCL will only request for such payments in rare and exceptional circumstances and after careful considerations.

38. In accordance with this duty, CCL sets out the following position:

- i. Exceptional circumstances may arise where the nature or scale of the event presents a demonstrable and significant risk to safety or public order that cannot be mitigated through standard institutional arrangements. In such cases, a proportion of the security costs may be passed on to the organiser, subject to a clear and transparent justification.
- ii. Any decision to pass on security costs will be based on objective criteria, including the scale of the event, the assessed level of risk, and the availability of internal resources. The process will be agnostic to the views or beliefs expressed at the event.
- iii. Organisers will be provided with a written explanation of any costs attributed to them, along with an opportunity to appeal the decision through an independent review process.

- 39.** Given that CCL delivers its programmes solely online, and the majority of its teaching and business activities take place in online environments, the need for physical security arrangements is limited. For events organised by staff as part of routine institutional business, associated costs are expected to be met by the relevant department through standard budgeting procedures.

H. Data processing and protection

- 40.** Freedom of speech must be balanced with individuals' rights to privacy and data protection. CCL's processing of personal data in connection with events or speech complies with data protection principles, including lawfulness, fairness, and transparency.

I. Reporting and Monitoring

- 41.** CCL is committed to ensuring transparency and accountability in the implementation of its duties relating to freedom of speech including how it manages its Events and External Speaker process.
- 42.** To support this commitment, the Board of Governors receive an annual report on anonymised statistical data gathered through the Events and Speakers Procedure. The report will also be submitted annually to the Office for Students (OfS) as part of the Institution's obligations under the *Prevent Duty Monitoring, Accountability and Data Return*.
- 43.** Any event or circumstance arising under this Procedure that materially affects, or has the potential to materially affect, CCL's legal status, business model, or ability to meet the ongoing conditions of registration with the OfS shall be classified as a '*Reportable Event*' and disclosed to the OfS in accordance with regulatory requirements.