

CORPUS CHRISTI COLLEGE  
University of Cambridge

## Code of Practice on Freedom of Speech

<b>Purpose</b>	To set out the College's commitment to freedom of speech, outline the various legislative frameworks under which such freedoms must be upheld and may be circumscribed, and summarise the procedures used by the College to manage these issues.		
<b>Responsible Person</b>	Dean of College		
<b>Responsible Committee</b>	Governing Body		
<b>Current Version</b>	1.0	<b>Revision Date</b>	10 June 2024
<b>Approved by</b>	GB	<b>on</b>	1 July 2024
<b>Next review due</b>	9 June 2025		
<b>Review schedule</b>	Annually, or as needed, by the author; minor revisions to be approved by Head of Governance. Executive Body to review and approve every 3 years; Governing Body to review and approve every 5 years.		
<b>Revision history</b>	A history of revisions to this policy is included at the end of the document.		

### **Explanatory note (this does not form part of the Code)**

Please note that this Code of Practice applies with effect from 1 August 2024 despite UK Government plans to stop further commencement of the Higher Education (Freedom of Speech) Act 2023. Other preparatory work is now paused pending further clarity, and consideration will be given in due course as to whether any changes already implemented should be amended.

## **1. Introduction**

- 1.1 Corpus Christi College is fully committed to the principle, and to the promotion, of freedom of speech.
- 1.2 This Code of Practice sets out the College's commitment to freedom of speech, outlines the various legislative frameworks under which such freedoms must be upheld and may be circumscribed, and summarises the procedures used by the College to manage these issues.

## **2. Scope**

- 2.1 This Code of Practice applies to:
  - 2.1.1 all junior and senior members of the College as well as staff and others affiliated with the College.
  - 2.1.2 visiting speakers and all other persons invited or otherwise lawfully participating in College activities on College premises.
- 2.2 For the avoidance of doubt, this Code of Practice does not apply to purely commercial meetings or events on College premises.
- 2.3 References in this Code of Practice to "College premises" means those premises over which Corpus Christi College exercises control, whether indoor or outdoor.
- 2.4 The University of Cambridge and its associated Cambridge Students' Union both have their own duty to secure freedom of speech within the law and have both issued their own Code of Practice on this topic.
- 2.5 The activities of the College student unions, the Junior Combination Room (JCR) and Middle Combination Room (MCR) are subject to this Code of Practice and adherence of the JCR and MCR to the Code is monitored by the College.

## **3. Key Concepts and Legislative Framework**

- 3.1 Freedom of speech means the freedom, within the law, to receive and impart ideas, opinions or information by means of speech, writing or images (including in electronic form) without interference.
- 3.2 Academic freedom, in relation to Fellows and other academic staff at the College, means their freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without loss of their jobs or privileges at the College, or the likelihood of their securing promotion or different jobs at the College being reduced.
- 3.3 These concepts are underpinned by the Human Rights Act 1998, which brings the European Convention on Human Rights into direct effect in national law. Article 10 of the European Convention articulates freedom of expression as a human right and sets out the limited circumstances in which that right might be circumscribed (such as to protect public safety, for the prevention of disorder or crime, or for the protection of the reputation or rights of others). These concepts also exist within other UK legislation. Universities and similar institutions in England (including the College) have duties under the Higher

Education and Research Act 2017 (as amended by the Higher Education (Freedom of Speech) Act 2023) to take such steps as are reasonably practicable to secure and promote freedom of speech and academic freedom within the law for staff and students and for visiting speakers.

- 3.4 Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on certain bodies, including higher education institutions such as the College, in the exercise of their functions to have 'due regard to the need to prevent people from being drawn into terrorism'. This necessitates the establishment of protocols and procedures by which to assess the risks associated with meetings or events that are University hosted, affiliated, funded, or branded. This Act also requires the College to have particular regard to its other duties with regard to academic freedom and freedom of speech. Debate, discussion, and critical enquiry are, in themselves, powerful tools in preventing people from being drawn into terrorism.
- 3.5 Under the Equality Act 2010, all junior and senior members of the College as well as staff and others affiliated with the College must not be subjected to unlawful discrimination, harassment, intimidation or threats of violence on the grounds of race, sex, age, religion or philosophical belief, sexual orientation, disability, gender reassignment, marriage and civil partnership, or pregnancy or maternity. However, the provisions of the Equality Act 2010 are not to be interpreted to undermine freedom of speech and academic freedom. As a result, students' learning experience and the working environment of Fellows and staff may include exposure to research, course material, discussion or speakers' views that they find offensive, contentious or unacceptable, but are nonetheless within the law, and unlikely to be considered unlawful harassment or discrimination under the Equality Act 2010.
- 3.6 There are other legislative requirements that may be relevant in particular cases, such as offences under the Terrorism Acts if speech encourages terrorism, or amounts to the incitement of religious or racial hatred or hatred on the grounds of sexual orientation under the Public Order Acts, as well as statutory requirements relating to the holding of processions and assemblies. The College is not under any obligation to secure or promote freedom of speech that contravenes any legislative requirements.

#### **4. Values**

- 4.1 The College's core values are 'freedom of thought and expression' and 'freedom from discrimination' and it encourages its staff, students and visitors to engage in robust, challenging, evidence-based and civil debate as a core part of academic enquiry and wider College activity, even if they find the viewpoints expressed to be disagreeable, unwelcome or distasteful. These values extend to the JCR and MCR of the College. The steps the College takes to embed its values in practice are set out in section 5 below.
- 4.2 The College fosters an environment in which all junior and senior members of the College as well as staff and others affiliated with the College can participate fully in College life, and feel able to question and test received wisdom, and to express new ideas and controversial or unpopular opinions within the law, without fear of intolerance or discrimination. In exercising their right to freedom of speech, the College expects its Fellows, staff, students and visitors to be tolerant of the differing opinions of others, in

line with the College's core value of freedom of expression. The College also expects its Fellows, staff, students and visitors to be tolerant of the diverse identities of others, in line with the College's core value of freedom from discrimination. While debate and discussion may be robust and challenging, all speakers have a right to be heard when exercising their right to free speech within the law. Neither speakers nor listeners should have reasonable grounds to feel censored or intimidated.

- 4.3 The College will ensure that senior members of the College as well as staff and others affiliated with the College are able to exercise freedom of thought and expression within the law without placing themselves at risk of losing their job, Fellowship or other supernumerary position, or any College privileges and benefits they have or affecting the likelihood of their securing other jobs or roles in the College. The College expects all junior and senior members of the College as well as staff and others affiliated with the College to engage with intellectual and ideological challenges in a constructive, questioning and peaceable way. The right of junior and senior members of the College as well as staff and others affiliated with the College to freedom of assembly, and to protest against certain viewpoints, should not obstruct the ability of others to exercise their lawful freedom of speech.

## **5. Steps the College Takes to Ensure Freedom of Speech and Academic Freedom**

- 5.1 The College will ensure that its teaching, curriculum, programmes of events (both of the College and its JCR and MCR), and policies and procedures reflect its duties to ensure, so far as is reasonably practicable, freedom of speech and academic freedom within the law and a very high level of protection for the lawful expression of viewpoints and for speech in an academic context, including but not limited to:
- 5.1.1 its processes for programme development and approval, quality assurance and academic assessment;
  - 5.1.2 its processes for admission, appointment, reappointment and promotion;
  - 5.1.3 its policies relating to equality, diversity and inclusion (including the public sector equality duty) and the Prevent duty;
  - 5.1.4 its processes for facilitating research; and
  - 5.1.5 its codes of conduct and other behaviour policies, which will ensure no individual will be subjected to disciplinary sanction or other less favourable treatment by or on behalf of the College because of the lawful exercise of freedom of speech or academic freedom.
- 5.2 The College does not enter into non-disclosure agreements related to complaints about sexual misconduct, bullying or harassment.
- 5.3 The College has processes in place to identify and manage any risks to freedom of speech or academic freedom arising from the terms of certain overseas funding, including funding from endowments, gifts, donations, research grants and contracts, and educational or commercial partnerships.
- 5.4 The College shall:

- 5.4.1 ensure that this Code of Practice is brought to the attention of new students at matriculation and new Fellows, staff and others affiliated with the College during induction;
  - 5.4.2 draw the attention of junior (including newly-elected members of the JCR and MCR committees) and senior members of the College as well as staff and others affiliated with the College to this Code of Practice annually, and ensure that it is referred to in other College documentation as appropriate;
  - 5.4.3 ensure that all relevant senior members of the College as well as staff and others affiliated with the College are aware of and/or receive appropriate training on freedom of speech and academic freedom;
  - 5.4.4 ensure that all relevant decision-makers, in making any decision or adopting any policy that could directly or indirectly (and positively or negatively) affect freedom of speech, act compatibly with the College's free speech duties as they apply in the relevant circumstances;
  - 5.4.5 periodically seek feedback from Fellows, staff, students and other stakeholders to secure their views on whether freedom of speech and academic freedom at the College are being adequately protected and take the responses into account;
  - 5.4.6 ensure that there are adequate measures in place to raise concerns about freedom of speech and academic freedom;
  - 5.4.7 ensure that when new policies and procedures are introduced consideration is given to their impact on freedom of speech and academic freedom;
  - 5.4.8 ensure that it has appropriate processes for the holding of events and meetings as set out in section 6 below;
  - 5.4.9 monitor any concerns that have been raised about freedom of speech and academic freedom to ensure that they are addressed so far as is reasonably practicable and to address any lessons learned and draw the attention of complainants to its processes for investigating complaints and the OfS complaint scheme as set out in section 7; and
  - 5.4.10 take steps to secure compliance with this Code of Practice, including where appropriate taking disciplinary action.
- 6. College, JCR and MCR Events and Meetings – Procedures and Conduct of Attendees**
- 6.1 Active speaker programmes are fundamental to the academic activities of the College and junior and senior members of the College as well as staff and others affiliated with the College are encouraged to invite a wide range of speakers and to engage critically but courteously with them, including as set out at paragraph 6.6 of this Code. This Code of Practice provides the only mechanism by which the College can cancel or impose conditions on College, JCR and MCR meetings or events where this action is deemed necessary as a result of the event's subject matter and/or speaker(s). This is to ensure that the use of College premises is not inappropriately denied to any individual or body of persons on any ground connected with their beliefs or views or the policy or objectives of a body (with the exception of proscribed groups or organisations) of which they are a

member. However, all speakers should anticipate that their views might be subject to robust debate, critique and challenge.

- 6.2 The starting point should always be that the event should go ahead and that cancellation is exceptional and undesirable. Depending on the circumstances, it may however be reasonable to refuse permission for a College meeting or event where the College reasonably believes (from the nature of the speakers or from similar activities in the past whether held at the College or otherwise) that:
- 6.2.1 the views likely to be expressed by any speaker are contrary to the law;
  - 6.2.2 the speaker is likely to incite breaches of the law or to intend breaches of the peace to occur;
  - 6.2.3 the meeting will not permit contrary or opposing viewpoints to be held or expressed;
  - 6.2.4 the speaker and/or the organisation they represent advocates or engages in violence in the furtherance of their political, religious, philosophical or other beliefs;
  - 6.2.5 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; or
  - 6.2.6 it is in the interest of public safety, the prevention of disorder or crime, the proper functioning of the College or the protection of those persons lawfully on College premises, that the meeting does not take place.
- 6.3 The lawful expression of controversial or unpopular views will not in itself constitute reasonable grounds for withholding permission for a College, JCR or MCR meeting or event.
- 6.4 Where the College is reasonably satisfied that the otherwise lawful expression of views at an event or meeting on College premises is likely to give rise to disorder or threats to the safety of participants or the wider College community, the College shall consider what steps it is necessary to take to ensure the safety of all persons and the security of College premises. These may include, but are not limited to: requirements as to the provision of security/stewards, the speaker being part of a panel, ensuring that a member of staff is in attendance, or that the event or meeting should take place in alternative premises, at a later date, or in a different format. The College may impose such conditions and requirements upon the organisers as are reasonably necessary in all the circumstances, ensuring that the conditions and requirements go no further than is necessary to address the risks it has identified.
- 6.5 The College will only pass on the costs of security for using the premises to those arranging the relevant event or meeting in exceptional circumstances, such as where the costs are wholly disproportionate to the numbers likely to be attending the event and the event could be held in a more proportionate way, or where the visiting speaker could reasonably be expected to have their own security because of the political or state office they hold. Any request to a meeting or event organiser to pay security costs in exceptional circumstances will be in writing and will explain those costs and the right to appeal to the Committee on External Speakers (see Annex below). Any request to pay security costs will

not be influenced to any degree by the ideas or opinions of any individual involved in organising the event or meeting, or by the policy or objectives of, or the views of any of the members of, anybody involved in organising the event or meeting.

- 6.6 These narrow exceptions to the general principle of freedom of speech are not intended ever to apply in a way that is inconsistent with the College's commitment to the completely free and open discussion of ideas.
- 6.7 Those attending events and meetings at the College are expected to conduct themselves in a manner consistent with the following principles:
- 6.7.1 everyone has the right to free speech within the law;
  - 6.7.2 the aim of events at the College is to expose Fellows, staff and students to the widest possible range of views, within the law;
  - 6.7.3 protest is itself a legitimate expression of freedom of speech but protesters should recognise the rights of others participating in the event or meeting, and in particular not violate the rights of others to speak during the event. Protest must not shut down debate.
- 6.8 Where any person or body to whom this Code of Practice applies is seeking to hold a College, JCR or MCR event or meeting on College premises which is outside the normal academic curriculum the processes in the Annex shall be followed, except where the event or meeting is purely commercial.

## **7. Breaches and Complaints**

- 7.1 Where the College receives a concern about the exercise of academic freedom or freedom of speech or where it has received a concern about a possible infringement or departure(s) from the values and procedures set out in this Code of Practice, it will refer it to the Committee on External Speakers to consider which of its procedures are most appropriate to consider the concern, making such enquiries and seeking such information as it considers necessary. Such consideration may lead to further investigation in accordance with the College's disciplinary, grievance or complaints procedures.
- 7.2 The Office for Students (OfS) operates a free speech complaints scheme. Under that scheme, the OfS can review complaints about free speech from members, students, staff, applicants for academic posts and (actual or invited) visiting speakers. Information about the complaints that the OfS can review is available on its website at <https://www.officeforstudents.org.uk/advice-and-guidance/quality-and-standards/freedom-of-speech/raising-concerns-about-free-speech>.

## **8. Monitoring and Review**

- 8.1 The Executive Body will periodically review the contents and operation of this Code of Practice and report on its operation to the Governing Body.
- 8.2 The point of contact for any query about this Code of Practice and its Annex is the Dean of College ([dean-of-college@corpus.cam.ac.uk](mailto:dean-of-college@corpus.cam.ac.uk)).

## **Annex: Processes for Meetings and Events on College Premises**

This Annex is issued under paragraph 6.7 of the College's Code of Practice on Freedom of Speech, which reads: "Where any person or body to whom this Code of Practice applies is seeking to hold a College event or meeting on College premises which is outside of the normal academic curriculum the processes in the Annex shall be followed, except where the event or meeting is purely commercial."

This Annex applies to all junior and senior members of the College as well as staff and others affiliated with the College or the University wishing to hold events on the premises of the College. It covers all events and meetings taking place in the College, both indoor and outdoor.

No event may be publicised before approval has been given by the College.

All event, meeting or room booking requests must be submitted no less than 7 days before the event through the Corpus Event Booking System available online at <https://forms.office.com/r/N3GWTdUHeU>. Events that require catering provision must be submitted no less than 14 days before the event. The College reserves the right to approve events requested less than 7 or 14 days in advance under special circumstances.

The information collected through the online form is included in Appendix A to this Annex and can be changed from time to time by the College's Executive Body without amending the Annex itself. Appendix B details the conditions of submitting a booking request that need to be adhered to.

The event organiser must inform the College if any of the information supplied changes. The College reserves the right to seek additional information from the event organiser at any point in the approval process and to rescind approval of an event at any time.

This Code of Practice does not cover ecclesiastical events taking place in the College Chapel, which are the responsibility of the Dean of Chapel and/or the Chaplain.

For events that do not fall under this Annex as defined in the College Rules, approval must be sought using the Corpus Informal Gathering Register.

### **Approval for Events on College Premises**

All event booking requests are first considered by the Conference and Accommodation Office to ensure room or venue availability and (if catering is required) the feasibility of kitchen and pantry support for the event. If the Office approves the booking, College Officers will be notified via automatic email from the online booking system if their approval is needed. Depending on the information supplied, each event will need to be approved by the appropriate College Officers. College Officers are required to give a reason for their approval or rejection.

All decisions are taken finally by the Dean of College, who will take into account the opinion of other College Officers as set out in the paragraphs below.



All events planned during the examination period also need approval from the Senior Tutor.

All student events involving the sale, service or consumption of alcohol need approval from the Dean of College.

All events held at Leckhampton also need approval from the Warden of Leckhampton.

All events that will be filmed, broadcast or recorded also need approval from the Bursar and/or Head of Communications.

All student events that have a Fellow in attendance also need to be approved by that Fellow.

All lectures, talks, workshops and seminars also need to be approved by the Senior Tutor.

Final approval of all events rests with the Dean of College. The person requesting the booking will be notified via the automated system of the Dean's decision and the reasons for it.

### **Meetings Involving External Speakers**

When a College room or venue is booked for an event that will be addressed by an external speaker, this **MUST BE DECLARED IN THE EVENT BOOKING FORM**. Such a meeting requires specific approval.

No event with an external speaker may be publicised as taking place until such approval has been granted and notified.

An 'external speaker' is anybody giving a lecture or talk or participating in a workshop or seminar who is not a current member (senior or junior) of the College, the University, or another Cambridge College.

The requirement for permission applies to any meeting, whether booked by junior members, fellows, staff or external organisations.

The Senior Tutor and the Dean of College may approve external speaker meetings themselves or refer an application to the Committee on External Speakers.

Permission for an external speaker meeting may be granted subject to conditions (e.g., that a porter be present as a security measure).

The principles to be applied in deciding whether or not to grant permission, or to impose conditions, are those set out in the Code of Practice on Freedom of Speech above, in particular in Section 6.

### **The Committee on External Speakers**

The Committee on External Speakers shall consist of the Senior Tutor (chair), the Bursar and three other Fellows – one of whom would normally be a Fellow in Law – as appointed by the Executive Body for a three-year term.

The Committee shall decide whether to grant approval for an external speaker meeting when an application is referred to it, in accordance with the principles set out above.

If an event involving an external speaker has been rejected by the Dean of College and/or the Senior Tutor, the person requesting the event can appeal to the Committee. The applicant may also appeal against conditions placed on the event, including a requirement that they bear the costs of security.

If the Committee refuses permission for an external speaker, the applicant may appeal to the Master against the refusal. The Master shall review the application in accordance with the principles in the Code of Practice on Freedom of Speech and decide afresh whether or not to grant permission. The Master's decision shall be final.

### **Changes to Bookings**

The organisers of an event on College premises must comply with any conditions set by the College or its officers in relation to the event and must make any changes the College requests. This may include the issuing of personalised tickets, increasing the number of student stewards, hiring the services of porters (at a rate of £30 per hour for each porter in attendance payable to the College), consulting the police about arrangements that may result in a breach of the peace, or changes to date, time or place of the event. Subject to section 6.5 of the Code of Practice on Freedom of Speech, costs associated with these conditions must be met by the event organisers.

**Appendix A: Information collected for all event bookings**

- Details of the person making the booking: title, first and last name, email address, category (student/Fellow/staff/external), phone number
- Details of the person hosting the event: title, first and last name, email address, category (student/Fellow/staff/external), phone number
- Event source (College society/group, University society/group, external/commercial booking, other)
- Name of society or organisation
- Event type (meeting, seated dining, drinks reception, lecture/talk/workshop/seminar, garden party, rehearsal, other)
- Event type description
- If lecture/talk/workshop/seminar, speaker name(s), title and topic of lecture/talk
- Event name
- Preferred event room/space (Dining Hall, Fellows' Garden, Harley Mason Room, Kho Roof Terrace, Law Room, Leckhampton Bar, Leckhampton Dining Hall, Leckhampton Music Room, McCrum Lecture Theatre, Meeting Room I4, NCR, New Court, OCR, Old Court, Parker Room, Pelican Bar, Warden's Meeting Room)
- Email address of Fellow in attendance (if required)
- Date of event
- Start time of event
- End time of event
- Will the event be broadcast or recorded (yes/no)
- Will attendees be charged to attend (yes/no)
- Will alcohol be served (yes/no)
- Catering requirements
- Minimum number of people attending
- Maximum number of people attending
- For student events, details of student stewards depending on the number of attendees, with one steward required for events with less than 30 attendees, two for events with less than 70 attendees, three for events with less than 100 attendees and four for events with more than 100 attendees
- Comments

## **Appendix B: Booking form conditions**

1. All booking requests must comply with the College Events Code of Practice (available on the College website), and any applicable laws and/or College Rules.
2. All room bookings for events are provisional until this form has been completed and duly authorised. Event organisers can expect a response within seven days during full term but this may take longer. The College reserves the right to seek additional information before confirming a booking.
3. The event organiser (i.e. the named person making the booking) agrees as a condition of submitting the room booking request to notify the College if any of the details submitted change.
4. All student events require stewards in accordance with the College Rules. Events with fewer than 30 attendees require one steward; events with fewer than 70 attendees require 2 stewards; events with fewer than 100 attendees require 3 stewards; events with more than 100 attendees require 4 stewards. The event organiser is normally expected to be a steward. Where appropriate, please give the names and contact details of those persons who have agreed to act as stewards at the event.
5. The College reserves the right to review its decision on allowing an event to proceed if any of the information provided changes.
6. The booking must be made at least 7 days in advance of the event itself, except where catering is required, where the booking must be made at least 14 days in advance.
7. Application may be made for a linked series of events (for example, a seminar series or a set of rehearsals/performances); in which case this information should be clearly set out on the event booking form; in complex cases it may be advisable to contact the Dean of College in advance, but only after determining from Conferencing and Catering that rooms are available for the proposed linked series of events.
8. The deliberate provision of false or incomplete information by the event organiser may be addressed under the disciplinary procedures of the College, if appropriate, or otherwise invalidate the booking.
9. An event must not be publicised before approval has been granted.

By submitting this form, you agree to all of the above conditions.

**Revision history**

<b>Version</b>	<b>Responsible Person</b>	<b>Summary of changes</b>	<b>Review date</b>	<b>Approved by</b>	<b>Approval date</b>
1.0	Dean of College	Initial Code of Practice	10 June 2024	GB	1 July 2024