

Code of Practice on Freedom of Speech



**Christ the
Redeemer College**
L o n d o n

1. Statement of Purpose

- 1.1. Christ the Redeemer College (the “College”) is committed to being an inclusive academic community in which staff and students learn from, challenge, and engage with one another through open debate, rigorous enquiry, and intellectual exchange.
- 1.2. The College promotes the search for knowledge and the questioning of ideas through open discussion, investigation, and academic engagement. Its commitment to freedom of expression and academic freedom is integral to its mission and to the proper functioning of higher education.
- 1.3. The College shall take such steps as are reasonably practicable to ensure that freedom of expression within the law is secured for its staff, students, and visiting speakers, and that the use of its premises is not denied to any individual or body on grounds connected with their lawful beliefs or views.
- 1.4. This Code of Practice (“the Code”) sets out the College’s approach to freedom of expression and academic freedom, its institutional values and expectations, and the arrangements through which these principles are upheld in practice across its academic and co-curricular activities.
- 1.5. This Code shall be interpreted in a manner consistent with the Higher Education and Research Act 2017 (as amended by the Higher Education (Freedom of Speech) Act 2023), the Human Rights Act 1998, and relevant Office for Students guidance.

2. Scope

- 2.1. The purpose of this Code is to:
 - 2.1.1. describe the College’s framework regarding the right to freedom of expression;
 - 2.1.2. set out how freedom of expression operates across the College’s activities; and
 - 2.1.3. provide the framework for the organisation and management of meetings, events, and use of College premises.

- 2.2. This Code applies to:
 - 2.2.1. all employees and those working on behalf of the College (including agency workers and contractors);
 - 2.2.2. all students of the College, whether full-time or part-time, including those studying under collaborative or partnership arrangements;
 - 2.2.3. all members of the College, including members of its governing bodies and committees;
 - 2.2.4. visiting speakers and all other persons invited to or otherwise lawfully on College premises; and
 - 2.2.5. any external individuals or organisations using College premises or operating under the College's name or auspices.
- 2.3. All persons to whom this Code applies are under an obligation to take no action which would hinder freedom of expression within the law or academic freedom, or which would prevent the College from discharging its duty to secure freedom of expression within the law.
- 2.4. This Code applies to:
 - 2.4.1. activities conducted on College premises, including physical and virtual spaces;
 - 2.4.2. activities organised by or on behalf of the College at external venues; and
 - 2.4.3. both formal and informal activities, including meetings, lectures, seminars, debates, conferences, and other events.
- 2.5. This Code applies to activities organised by staff, students, or external bodies using College facilities, and includes events and activities held online or delivered through digital platforms.
- 2.6. References in this Code to "College premises" include any premises over which the College exercises control, including online and virtual environments.
- 2.7. For the avoidance of doubt, this Code does not apply to purely commercial meetings or events where the College has no academic or institutional involvement.
- 2.8. This Code shall be made available publicly and communicated clearly to all members of the College community.

3. Definitions and Key Concepts

- 3.1. Whilst they are often used interchangeably and relate to one another, freedom of expression and academic freedom are distinct but closely connected concepts.
 - 3.1.1. **Freedom of expression** is the right to freely express lawful views and opinions, whether through speech, writing, or other forms of communication, and to do so without interference.
 - 3.1.2. **Academic freedom** is the **freedom** within the law for academic staff to:
 - 3.1.2.1. question and test received wisdom; and
 - 3.1.2.2. put forward new ideas and controversial or unpopular opinions
 - 3.1.2.3. not being placed at risk of disadvantage. An individual will be regarded as having been disadvantaged where they are subject to adverse consequences, including but not limited to loss of employment, denial of privileges, or reduced opportunity for progression, as a result of the lawful exercise of academic freedom.
- 3.2. Whilst many higher education providers use the terms “freedom of speech” and “freedom of expression” interchangeably, this Code adopts the term **freedom of expression**, as it captures the full range of lawful expressive activity, including spoken, written, and other forms of expression.
- 3.3. The College is subject to statutory duties requiring it to take reasonably practicable steps to secure freedom of expression within the law and academic freedom for its staff, students, and visiting speakers. These duties arise under the Higher Education and Research Act 2017, as amended by the Higher Education (Freedom of Speech) Act 2023.
- 3.4. This Code sets out the College’s approach to fulfilling these duties, including its expectations of conduct and its arrangements for academic activity, events, and the use of College premises.

4. Values and Expectations

- 4.1. The College recognises that there is a very high level of protection for the lawful expression of a viewpoint and for speech in an academic context, and is committed to maintaining and promoting the rights of freedom of expression and academic freedom within the law.
- 4.2. The College acknowledges that freedom of expression is fundamental to debate, challenge, and intellectual enquiry within its academic and research activities. It enables staff, students, and visiting speakers to question accepted views, challenge the opinions of others, and share ideas that may be controversial, disturbing, or offensive, provided that such expression is lawful.
- 4.3. These freedoms support the development of critical thinking and academic confidence and are essential to the College's academic mission.
- 4.4. The starting point is that lawful expression is permitted unless otherwise restricted by law. The College will ensure that the use of its premises is not denied to any individual or body on grounds connected with their lawful beliefs, views, policies, or objectives.
- 4.5. The College recognises that the views expressed within its community may conflict with those held by others. Such views may be regarded as disagreeable, offensive, or unsettling. It is not the role of the College to protect individuals from exposure to lawful views or opinions that they may find uncomfortable, shocking, or disturbing.
- 4.6. The College affirms that staff, students, and visiting speakers have the right to express such lawful views and that exposure to differing perspectives is an integral part of higher education.
- 4.7. The College expects all persons to whom this Code applies to observe the principles of freedom of expression and to show tolerance and respect towards the views, opinions, and beliefs of others, even where these differ from their own.
- 4.8. No individual or group shall be subjected to harassment, intimidation, or discrimination on the basis of their lawful views.
- 4.9. The College's approach to freedom of expression and academic freedom is underpinned by the following principles:
 - 4.9.1. freedom of expression is fundamental to higher education and democratic society;

- 4.9.2. a culture of tolerance for differing ideas and perspectives must be actively upheld; and
 - 4.9.3. lawful expression is afforded a high level of protection, and any restriction shall be exceptional.
- 4.10. Nothing in this Code shall be interpreted as limiting the lawful rights of individuals to protest.
- 4.11. Peaceful protest is recognised as a legitimate form of expression. However, such protest must not prevent, obstruct, or substantially disrupt the lawful exercise of freedom of expression by others or the holding of lawful events.

5. Steps the College takes to Promote and Secure Freedom of Expression

- 5.1. The College shall ensure that its academic, administrative, and governance arrangements reflect its duty to secure, so far as is reasonably practicable, freedom of expression and academic freedom within the law.
- 5.2. This includes ensuring that:
- 5.2.1. its processes for programme development, approval, and academic assessment respect the rights of freedom of expression and academic freedom;
 - 5.2.2. its processes for admission, appointment, reappointment, and promotion are consistent with freedom of expression duties;
 - 5.2.3. its policies relating to equality, diversity and inclusion, and the Prevent duty, are interpreted and applied in a manner compatible with freedom of expression and academic freedom;
 - 5.2.4. no individual is subject to disciplinary sanction, disadvantage, or less favourable treatment as a result of the lawful exercise of freedom of expression or academic freedom; and
 - 5.2.5. students are not denied exposure to ideas on the grounds that they are controversial, unpopular, or offensive, where such expression is lawful.
- 5.3. The College recognises that association with it as an academic institution may confer a degree of authority and legitimacy on views expressed through its activities. In assessing what steps are reasonably practicable to secure

freedom of expression and academic freedom, the College will have regard to its academic mission and the contribution that proposed activities make to education, scholarly enquiry, and intellectual debate.

- 5.4. The College shall take steps to promote awareness and understanding of freedom of expression and academic freedom by:
 - 5.4.1. ensuring that this Code is brought to the attention of staff and students through induction and ongoing communication;
 - 5.4.2. providing appropriate training to those involved in decision-making;
 - 5.4.3. maintaining routes through which concerns relating to freedom of expression may be raised; and
 - 5.4.4. monitoring such concerns to ensure that lessons are identified and incorporated into future policy development and review.
- 5.5. In developing new policies and procedures, the College shall give due consideration to their potential impact on freedom of expression and academic freedom.

6. Assessment Framework for Decisions Affecting Freedom of Expression

- 6.1. In assessing its compliance with its duties, the College shall apply the following three-stage framework when considering any decision that may affect freedom of expression:
 - 6.1.1. Step 1 – Lawfulness**
 - 6.1.1.1. An assessment as to whether the speech or activity is within the law.
 - 6.1.1.2. If the speech is not lawful, the duty to secure freedom of expression does not apply.
 - 6.1.2. Step 2 – Reasonably Practicable Steps**
 - 6.1.2.1. Where the speech is lawful, the College shall consider whether there are reasonably practicable steps that can be taken to secure that speech.
 - 6.1.2.2. Where such steps exist, they shall be taken.
 - 6.1.3. In determining what is reasonably practicable, the following considerations shall not in themselves justify restriction:

- 6.1.3.1. the viewpoint that the speech expresses, including whether it is controversial, offensive, or unpopular;
 - 6.1.3.2. whether the views expressed align with the College's values;
 - 6.1.3.3. the potential reputational impact on the College;
 - 6.1.3.4. opposition from internal or external groups, including staff, students, donors, or other stakeholders.
- 6.1.4. Legal and regulatory obligations may affect what is reasonably practicable. Where the College is required by law not to permit an activity, doing so would be unlawful and therefore not reasonably practicable.

6.1.5. Step 3 – Restriction

- 6.1.5.1. Where there are no reasonably practicable steps to secure the speech, any restriction must be:
 - 6.1.5.1.1. prescribed by law;
 - 6.1.5.1.2. necessary and proportionate; and
 - 6.1.5.1.3. based on clear and evidenced assessment of a specific and identifiable risk.
- 6.1.5.2. If a proposed restriction does not meet these criteria, it shall not be implemented.
- 6.1.5.3. The College shall proceed on the basis that lawful speech should take place wherever reasonably practicable, and that restriction or refusal is exceptional.
- 6.1.5.4. All decisions affecting freedom of expression shall be:
 - 6.1.5.4.1. based on relevant evidence;
 - 6.1.5.4.2. clearly reasoned; and
 - 6.1.5.4.3. appropriately documented to ensure transparency and accountability.

7. Meetings and Events

- 7.1. Protecting freedom of expression extends across all events organised by staff or students of the College, or by any individual or body using the College's name, branding, or facilities, whether such events are held physically or virtually.

- 7.2. The lawful expression of controversial or unpopular views shall not in itself constitute reasonable grounds for withholding permission for a meeting or event.
- 7.3. Where any individual or body to whom this Code applies seeks to hold a meeting, event, or other activity on College premises, consent shall not be unreasonably refused.
- 7.4. The starting point for any consideration of whether to restrict or impose conditions on an event is that it should go ahead, and that cancellation or refusal is exceptional.
- 7.5. Any decision relating to meetings or events shall be made in accordance with the assessment framework set out in Section 5 of this Code.
- 7.6. Where the College reasonably considers that an event may give rise to risks relating to safety, public order, or lawful conduct, it shall consider what reasonably practicable steps can be taken to enable the event to proceed.
- 7.7. Such steps may include, but are not limited to:
 - 7.7.1. requirements relating to security or stewarding;
 - 7.7.2. changes to the timing or location of the event;
 - 7.7.3. arrangements relating to the format of the event, including panel discussions or moderated debate;
 - 7.7.4. the appointment of an independent chair;
 - 7.7.5. requirements for supervision or recording of the event; or
 - 7.7.6. the presence of a member of College staff.
- 7.8. Any conditions imposed shall:
 - 7.8.1. address identified and specific risks;
 - 7.8.2. be proportionate;
 - 7.8.3. go no further than is reasonably necessary; and
 - 7.8.4. not be based on the lawful views or opinions of the speaker or organisers.
- 7.9. Where the College concludes that imposing conditions would not be sufficient to prevent unlawful activity or serious disorder, it may refuse permission for the event to proceed.

- 7.10. Any decision to refuse or restrict an event must be lawful, rational, proportionate, and supported by clear evidence.
- 7.11. The College shall not refuse or restrict an event on the basis of:
- 7.11.1. the lawful views expressed or likely to be expressed;
 - 7.11.2. disagreement with those views; or
 - 7.11.3. concerns relating solely to reputational impact.
- 7.12. Where a decision is taken to impose conditions or refuse an event, the College shall communicate its decision promptly and provide clear reasons.
- 7.13. The procedures to be followed by organisers in requesting and conducting events are set out in the External Speakers and Events Policy and the Procedures for the Approval and Management of Events (Annex), which shall be read in conjunction with this Code.

8. Conduct at Events

- 8.1. Everyone has the right to freedom of expression within the law. The College expects staff, students, and visitors to ensure that freedom of expression within the law is upheld at all times.
- 8.2. The College seeks to expose its staff and students to the widest possible range of ideas and views. All persons to whom this Code applies are required to observe the principle of freedom of expression while on College premises or when engaged in College activities, and to show tolerance towards the views, opinions, and beliefs of others, even where these differ from their own or may be considered offensive, controversial, or challenging but are nonetheless lawful.
- 8.3. A member of staff or student who organises an event on College premises shall be responsible for ensuring, so far as reasonably practicable, that the event is conducted in such a manner as:
- 8.3.1. to promote freedom of expression;
 - 8.3.2. to maintain good order; and
 - 8.3.3. to ensure compliance with the law.
- 8.4. Speakers and participants are responsible for their own compliance with the law in the expression of their views.

- 8.5. Staff, students, and visitors must not engage in conduct which prevents, obstructs, or disrupts the holding or orderly conduct of any lawful meeting, event, or activity that takes place on College premises.
- 8.6. Nothing in this Code shall be taken to prohibit the lawful exercise of the right to peacefully protest. However, protest must not infringe the rights of others, including their right to freedom of expression, and must not prevent a lawful event from proceeding.

9. Infringements, Complaints, and Penalties

- 9.1. A breach of this Code may result in action being taken under the College's relevant procedures, including staff disciplinary procedures or student disciplinary processes, as appropriate. In addition to internal processes, breaches of the law may give rise to criminal investigation or prosecution.
- 9.2. All staff, students, and other persons to whom this Code applies are required to comply with any investigation into an alleged breach of this Code.
- 9.3. Where an alleged infringement arises from an event or activity to which this Code applies, the College may take such steps as are reasonably necessary to investigate the matter and, where appropriate, to assist relevant authorities in identifying any individuals involved in unlawful conduct.
- 9.4. Concerns or complaints regarding freedom of expression or academic freedom, or the application of this Code, shall be considered in accordance with the College's Freedom of Speech Complaints Procedure.
- 9.5. Where the College receives a concern or complaint, it shall:
 - 9.5.1. consider the matter promptly and impartially;
 - 9.5.2. determine whether there has been an infringement of this Code or a failure to follow appropriate procedures; and
 - 9.5.3. take such action as is reasonably necessary in response.
- 9.6. The College may implement an initial assessment process in order to identify complaints that do not warrant further investigation, including where the complaint does not relate to freedom of expression within the law.
- 9.7. Where appropriate, complaints may be subject to further investigation in accordance with the College's disciplinary or complaints procedures.

- 9.8. Individuals who remain dissatisfied following the conclusion of internal processes may refer their complaint to the Office for Students in accordance with its Freedom of Speech complaints scheme.
- 9.9. The College shall ensure that complaints and their outcomes are appropriately recorded in order to support transparency, accountability, and monitoring of compliance with its statutory duties.

10. Monitoring and Review

- 10.1. The College shall record decisions that are likely to have a significant effect, whether positive or negative, on freedom of expression within the law and academic freedom.
- 10.2. The operation of this Code shall be monitored by the College, including through the review of events, complaints, and decisions made under its provisions.
- 10.3. The Senior Management Team shall have oversight of the implementation and effectiveness of this Code and shall report, as appropriate, to the Academic Board and Board of Governors.
- 10.4. This Code shall be subject to periodic review to ensure that it remains effective, up to date, and compliant with legal and regulatory requirements. Reviews shall take place at appropriate intervals and may be informed by:
 - 10.4.1. changes in legislation or regulatory guidance;
 - 10.4.2. the outcomes of complaints or investigations;
 - 10.4.3. developments in sector practice; and
 - 10.4.4. feedback from staff, students, and other stakeholders.
- 10.5. Any amendments to this Code shall be approved in accordance with the College's governance arrangements

Annex: Procedures for the Approval and Management of Events



**Christ the
Redeemer College**
L O N D O N

1. Purpose and Scope

- 1.1. This Annex sets out the procedures to be followed for the organisation, approval, and management of events held on College premises or conducted under the auspices of the College.
- 1.2. These procedures apply to all events involving external speakers and to events taking place outside the normal academic curriculum.
- 1.3. These procedures apply to events organised by staff, students, student representatives or the Student Council, affiliated groups, and external organisations using College facilities.
- 1.4. All provisions of this Annex shall be interpreted and applied in a manner consistent with the College's Code of Practice on Freedom of Speech, including the assessment framework set out in Section 4.

2. Responsibility for Events

- 2.1. All events shall have a designated organiser who is a member of staff, student, or authorised representative of the College.
- 2.2. The organiser shall be responsible for ensuring that full and accurate information is provided to the College and that the event is conducted in accordance with the Code of Practice, the External Speakers and Events Policy, and any conditions imposed.
- 2.3. Events organised by student representatives, including the Student Council, shall be subject to the same requirements and procedures as all other events.
- 2.4. Where no responsible organiser is identified, the event shall not proceed.

3. Submission of Event Requests

- 3.1. Requests to hold events shall be submitted in advance through the College's approved event request process.

- 3.2. Requests shall normally be submitted no less than two weeks in advance of the proposed event date, unless otherwise agreed.
- 3.3. The request shall include sufficient information to enable the College to assess the event, including:
 - 3.3.1. the identity of the speaker(s);
 - 3.3.2. the subject matter of the event;
 - 3.3.3. the format and location;
 - 3.3.4. any reasonably foreseeable risks.

4. Initial Review of Requests

- 4.1. The majority of event requests shall be approved as part of normal administrative processes.
- 4.2. Where no material concerns are identified, approval shall be granted without escalation.
- 4.3. Where concerns are identified, the request shall be referred for further review in accordance with Section 5.

5. Assessment of Higher-Risk or Complex Events

- 5.1. Where an event raises potential concerns, it shall be subject to further review by the appropriate College authority.
- 5.2. The purpose of this review shall be to determine:
 - 5.2.1. whether the event involves lawful speech;
 - 5.2.2. whether any risks are present;
 - 5.2.3. whether such risks can be mitigated through reasonably practicable steps.
- 5.3. This assessment shall be carried out in accordance with the framework set out in Section 4 of this Code.
- 5.4. The College will normally seek to complete the assessment of event requests within a reasonable timeframe, taking into account the nature and complexity of the event.

6. Decision-Making

- 6.1. Following review, the College shall determine whether the event:
 - 6.1.1. may proceed as planned;
 - 6.1.2. may proceed subject to conditions; or
 - 6.1.3. must be refused in accordance with Section 8.2 of this Code.

- 6.2. The College shall ensure that:
 - 6.2.1. refusal is exceptional;
 - 6.2.2. conditions are considered before refusal;
 - 6.2.3. decisions are based on evidence and legal principles.

- 6.3. Final decisions in complex or escalated cases shall be made by the Rector or nominee.

7. Conditions and Mitigation

- 7.1. Where risks are identified, the College shall seek to enable the event to proceed by imposing proportionate conditions.

- 7.2. Such conditions may include:
 - 7.2.1. requirements relating to event format;
 - 7.2.2. security or stewarding arrangements;
 - 7.2.3. supervision or moderation of discussion;
 - 7.2.4. changes to venue, timing, or delivery mode.

- 7.3. Conditions shall:
 - 7.3.1. address specific risks;
 - 7.3.2. be proportionate;
 - 7.3.3. not be based on the lawful views of the speaker or organisers.

8. Communication of Decisions

- 8.1. All decisions shall be communicated to the organiser in a timely manner.

- 8.2. Where conditions are imposed, the organiser shall confirm acceptance of those conditions before the event proceeds.

- 8.3. Where an event is refused, the College shall provide:
 - 8.3.1. clear reasons;
 - 8.3.2. reference to the applicable provisions of the Code of Practice.
- 8.4. Decisions shall be communicated to the organiser as soon as reasonably practicable.

9. Record Keeping and Monitoring

- 9.1. The College shall maintain a central record of:
 - 9.1.1. all event requests;
 - 9.1.2. decisions taken;
 - 9.1.3. conditions imposed;
 - 9.1.4. any incidents or follow-up actions.
- 9.2. Records shall be maintained to demonstrate compliance with the College's statutory duties and shall be subject to periodic review.

10. Conduct of Events

- 10.1. Once approved, all events shall be conducted in accordance with this Code of Practice and any conditions imposed.
- 10.2. Organisers shall take reasonably practicable steps to ensure that:
 - 10.2.1. lawful speech is protected;
 - 10.2.2. events proceed without disruption;
 - 10.2.3. participants comply with College requirements.
- 10.3. Any material breach of conditions may result in the event being suspended or terminated.

11. Escalation and Appeals

- 11.1. Where an organiser is dissatisfied with a decision, they may raise the matter through the College's Freedom of Speech Complaints Procedure.
- 11.2. The College shall ensure that appeals are considered fairly, impartially, and in accordance with established procedures.

020/26/CPFS2.

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London

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Related statutes or regulations	<ul style="list-style-type: none"> – Higher Education and Research Act 2017 (as amended by the Higher Education (Freedom of Speech) Act 2023) – Human Rights Act 1998 – Equality Act 2010 – Counter-Terrorism and Security Act 2015 (Prevent Duty) – Public Order and Terrorism legislation (as applicable) – OfS Regulatory Advice 24: Freedom of Speech Guidance
Related policies/procedures/guidance/forms	<ul style="list-style-type: none"> – Code of Practice on Freedom of Speech – External Speakers and Events Policy

	<ul style="list-style-type: none"> - Procedures for the Approval and Management of Events (Annex) - Freedom of Speech Complaints Procedure - External Speakers Register - Freedom of Speech Complaints Register - Equality, Diversity and Inclusion Policy - Prevent Duty / Safeguarding Policy - Relevant Codes of Conduct (staff and students) - External Speaker Request Form - Freedom of Speech Complaint Form - Birmingham Newman University Code of Practice on Freedom of Expression
Staff member responsible for update	Compliance and HR Manager

Amendment History

Version	Revision summary	Date Approved	Author
2025.v1		13/05/2025	Compliance and HR
2026.v2	<p>Comprehensive revision to align the Code closely with the Birmingham Newman University Code of Practice on Freedom of Expression, while maintaining compliance with the Higher Education (Freedom of Speech) Act 2023 and OfS Regulatory Advice 24.</p> <p>This version:</p> <ul style="list-style-type: none"> - Reframed the Code to adopt “Freedom of Expression” throughout; - Restructured the document to mirror BNU section order, headings, and narrative style; - Rewritten Scope to reflect 	01/06/2026	Marketing, HR and Compliance

	<p>BNU coverage across activities, persons, and environments;</p> <ul style="list-style-type: none">- Strengthened Definitions and Key Concepts, including explicit distinction between freedom of expression and academic freedom;- Expanded Values and Expectations to emphasise:<ul style="list-style-type: none">• high level of protection for lawful speech;• institutional neutrality;• no protection from exposure to lawful but offensive views;- Introduced a formal three-stage assessment framework (lawfulness, reasonably practicable steps, proportional restriction) aligned with OfS expectations;- Explicitly clarified that decisions must not be based on viewpoint, offensiveness, reputational risk, or external pressure;- Rewritten Meetings and Events to embed the presumption that events should proceed, with refusal as exceptional;- Updated Conduct at Events and Complaints/Enforcement to align with BNU structure while retaining CRC procedures and OfS escalation;- Strengthened monitoring and governance oversight;- Maintained full alignment with the External Speakers and Events Policy and associated procedures. <p>This revision achieves close textual alignment with BNU while preserving CRC's regulatory and governance framework.</p>		
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