

ISTITUTO MARANGONI LONDON

**CODE OF PRACTICE ON FREEDOM OF SPEECH AND EXTERNAL
SPEAKER POLICY**

2025-2027

Version Control Statement

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Amendments since approval	The Code of Practice has been reviewed and updated in response to the recent publication of OfS Regulatory Advice 24. The Code of Practice was reviewed and significantly updated last year in anticipation of the Freedom of Speech Act (2023) becoming law on 1 August and to comply with the School's legal duties at the time. At that time the OfS had not issued any regulatory advice of its own. not been published although the legal advice was sought on the requirements and proposed Code of Practice approved by the Board of Directors last year. FRC is asked to note that on 15 January 2025 the UK government indicated that while key provisions of the Act would come into force others would not be taken forward. Consequently, once approved this Code of Practice will also be reviewed in response to any further guidance or legislative changes.

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Istituto Marangoni London – Freedom of Speech Code of Practice and process for approval of events involving external speakers

1. Introduction

- 1.1 Istituto Marangoni London (the “School”) has a legal and regulatory obligation to ensure that freedom of speech within the law is secured for its members, staff, students and visiting speakers and that it has a Code of Practice governing Freedom of Speech. This Code of Practice sets out the School’s approach to freedom of speech and is designed to comply with its legal and regulatory responsibilities including the Higher Education (Freedom of Speech) Act 2023.
- 1.2 However, these obligations must be balanced against other legal obligations which set certain limits on freedom of speech and expression, in order to protect the rights and freedoms of others. In managing these competing rights, the governing bodies of higher education providers must have particular regard to the importance of taking all reasonable and practicable steps to ensure free speech and academic freedoms on campus. Relevant legislation includes the Higher Education Freedom of Speech Act (2023) and the Higher Education and Research Act 2017 which require higher education providers to ensure lawful freedom of speech and academic freedom on campus, the Human Rights Act 1998 and the Counter-Terrorism and Security Act 2015. A list of related legislation is included under appendix 5.
- 1.3 As a higher education provider regulated by the Office for Students Istituto Marangoni London is also required to comply with the OfS Regulatory Framework including its Public Interest Principles that incorporate both academic freedom and freedom of speech and incorporates the OfS Regulatory Advice 24.

2. Scope

- 2.1. In accordance with its legal and regulatory responsibilities this Code sets out the School’s values and expectations with regard to freedom of speech across its activities including teaching and research and events involving external speakers, visitors attending a meeting or function taking place on the School’s premises or external organisations using the School’s premises or organising activities on its behalf including student events. This Code applies to all students and members of staff, contractors, (including freelance tutors), and visiting speakers and any other individuals invited by the School, its staff or students. Any breaches against this Code of Practice will be treated as a disciplinary matter in accordance with the Staff and/or Student Code of Conduct and Disciplinary procedure. In accordance with OfS Regulatory Advice 24 and the Higher Education Act there is no requirement for IML to take steps to secure freedom of speech regarding any of its activities outside England.

3. Values and expectations

- 3.1 As an international academic community, the School values diversity and is committed to promoting and maintaining academic freedom and freedom of speech which are integral to teaching, learning and research in its broadest sense, affording all members of our community freedom of thought and expression, including the right to express lawful views and opinions, in speech, writing or visual expressions across different mediums. This Code of Practice aims to promote and secure freedom of speech and expression through taking through the lawful exchange of ideas and balanced debate recognising that this may involve the expression of controversial views or discussion of controversial topics. In accordance with our values all members of our staff and student community, visitors and those participating in School activities are expected to uphold freedom of speech within the law and show tolerance to those expressing or representing alternative opinions or ideas. We encourage all members of our community and visitors to express their opinions and exchange ideas providing these are within the law and

exercise their academic freedoms to learn, research and exchange ideas without fear of restriction or reprisal.

- 3.2 Freedom of expression (including through speech) and academic freedom is a key element of the delivery of higher education. Sharing and challenging ideas freely is a vital part of the higher education learning experience which allows students to develop the capacity to think critically, to be challenging in their thinking and to engage with different perspectives. As a diverse and international community, we are inclusive and committed to promoting and upholding equality and diversity which underpins our activity and values. We do not tolerate unlawful discrimination or discriminatory behaviour and have due regard to the need to eliminate unlawful discrimination, harassment and victimisation. The School recognises and values the role of external speakers in contributing to the exchange of ideas and debate including exploring and challenging different ideas, beliefs and opinions that generate discussion and debate which can enrich the staff and student experience providing such expressions are within the law and there is no attempt to incite illegality or endanger the rights and safety of our community.
- 3.3 The School will ensure, so far as is reasonably practicable, that no individual or body of persons is denied the use of any of its premises for reasons relating to their beliefs, views, policies or objectives. The School operates with a presumption in favour of free speech and will only restrict the right (for example, by withholding or withdrawing permission for an event to take place on campus) if the School is unable to take reasonable and practicable steps to mitigate potential risks (for example, risks to campus security or to the safety of individuals or property). In so doing, it respects that while the expression of certain views may cause offence or be disturbing to others this does not necessarily constitute sufficient grounds for restricting their expression providing such views are not contrary to law or inciting illegally (including the glorification of terrorism. The School expects all staff, students and members of the School to comply with the requirements of this Code of Practice.
- 3.4 The School acknowledges there is often a conflict between the legislation regarding freedom of speech and the legislation which may qualify or restrict it. The School operates with a presumption in favour of free speech and responsibility rests with the School for creating the balance between ensuring and promoting freedom of expression and protection of academic freedoms against the need to minimise the possibility of extremism or unlawful conduct happening or raise a risk of challenge to public safety and well-being. Safety and welfare are fundamental to the School's policy and practices and must be maintained and respected while freedom to express views may be tempered by the need to secure freedom from harm for staff, students, and visitors. In practice this means that freedom may be restricted to protect the rights of others and/or to maintain health and safety where such restrictions are proportionate and the School is unable to take reasonable and proportionate steps to mitigate any associated risks.
- 3.5 Additionally all academic staff and the students have the right to academic freedom. Academic freedom means the right to (a) question and test received wisdom and (b) put forward new ideas including controversial or unpopular opinions, without fear of being sanctioned for doing so providing they do not break the law. The right to academic freedom applies to all academic activities associated with teaching, scholarship and research. All staff and students are expected to uphold the right to freedom of speech and the right to academic freedom and this Code should not be used in a manner that limits the right to academic freedom or limits the right to freedom of speech unless it is proportionate and legal to do so.
- 3.6 The School, as an institution, does not take a formal position on political or international disputes. Instead, it endeavours to provide a platform to facilitate discourse on contemporary issues by encouraging critical debate within the law, where the views of all parties are treated with respect.
- 3.7 The School regards the exposure of students to course materials and statements made and views expressed as part of teaching, research or discussions connected with the course curriculum as unlikely to constitute harassment, unless otherwise demonstrated.

4. Legal Context and legal and regulatory responsibilities

- 4.1 The Higher Education (Freedom of Speech) Act 2023 replaced and strengthened earlier legislation under section 43 of the Education (No. 2) Act 1986, and the Higher Education and Research Act 2017 by requiring governing bodies and student unions of higher education institutions to have particular regard to free speech and to take reasonable steps to secure free speech for all staff, students and visiting speakers.
- 4.2 Freedom of Speech means everyone has the right to express lawful views and opinions, in whatever form without interference. Academic Freedom means protecting the intellectual independence of academics to question and test views and wisdom, and to put forward new ideas and controversial or unpopular opinions, without placing themselves in danger of losing their jobs or privileges. However, Freedom of Speech is not protected where it contravenes criminal law. All higher education institutions also have other legal duties requiring them to balance such duties with their freedom of speech obligations, including compliance with the Public Sector Equality Duty (Equality Act 2010), maintaining public order, preventing discrimination, victimisation and harassment and the Prevent Duty. The School also recognises that to uphold legal freedom of speech may at times expose staff, students and visitors to ideas and the expression of views or materials that individuals may find offensive or contentious but which are not unlawful or constitute unlawful harassment or discrimination.
- 4.3 In recognition of the School's wide ranging and varied legal obligations all staff, students, and visiting speakers should be made aware of the following:
- The School will not tolerate breaches of Criminal Law including, but not restricted to, incitement to terrorist activity, hate crimes (including the expression of anti-Semitic or other unlawful and discriminatory views), harassment, and breaches of the peace. Organisers should also make sure that any event does not breach legislation concerning assemblies, marches and public meetings, as well as operating within school regulations.
 - The School will protect rights guaranteed by law concerning individual rights to Freedom of Speech and Equality but will not allow freedom of speech to be used to violate individual(s) private rights.
 - Private Rights – People have private rights which entitle them to protection from harassment, bullying, threats, defamation, and other breaches of their human rights. This includes protection against unlawful discrimination on the grounds of any protected characteristic.
 - Privacy rights- in accordance with the [Data Protection Act](#) their privacy rights of attendees of events will be protected by the School.
 - The School is covered by the terms of the [Equality Act 2010](#) and in its role as an education provider and employer it will prevent unlawful discrimination against students, employees and other individuals attending any event. Therefore, segregation of attendees by gender or other personal characteristic is forbidden at all events held within the School's estate or supported as a School event.
 - The School will not tolerate activities that support or glorify terrorism or organisations that are prescribed as a terrorist organisation by the UK Government or will contravene UK Counterterrorism legislation, including the Prevent agenda – in particular whether views expressed are at risk of drawing people into terrorism.

5. Promoting and securing freedom of speech

- 5.1 The School promotes and secures freedom of speech through the following:
- Having well-established procedures for considering requests for visiting speakers;
 - Ensuring that this Code of Practice is brought to the attention of staff and students on arrival at staff induction and student Welcome Week, publishing it on the School's

Intranet, Student Handbook, Employees Handbook and through regular, at least annual awareness raising;

- Providing and ensuring relevant staff participate in training on the application of Freedom of Speech and academic freedom especially those with direct responsibility for discharging these responsibilities;
- Ensuring that whenever relevant policies and procedures are introduced or updated consideration is given to their impact on freedom of speech and academic freedom and that our processes, policies and practice reflect our legal duty to promote and secure lawful freedom of speech¹;
- Not treating individual students less unfavourably or less favourably than how it treats another student;
- Taking reasonably practical steps when someone applies to be a member of academic staff, that the individual is not adversely affected in their application because they have exercised their freedom within the law to question and test received wisdom, or to put forward new ideas and controversial or unpopular opinions.
- Ensuring teaching and research and their associated policies reflect our duties to promote, and to ensure, as far as is reasonably practical that freedom of speech is promoted and protected;
- Not constraining or pressurising academic staff in teaching or to endorse or reject particular value judgements;
- Having an effective and accessible complaints procedure to raise concerns about freedom of speech and academic freedom;
- Monitoring the outcome from complaints processes and any staff and student feedback to inform future practice;
- Regularly monitoring and updating this Code of Practice and any associated operational processes to ensure currency, compliance with our legal and regulatory responsibilities and that it continues to be informed by operational and sector practice including in response to any findings from freedom of speech complaints or concerns.

6. Promoting and securing Freedom of speech in teaching and research activities

6.1 The Code of Practice applies to all teaching and research and other related academic activities undertaken in School or on its behalf organised by members of staff, contract tutors or students. Visiting academics contributing or participating in these events including conference, research seminars or assessment activities are also required to comply with this Code of Practice. More specifically:

- The School's quality assurance processes for teaching and research including programme development, monitoring and review and assessment will respect academic freedom and freedom of speech within the law;
- All lectures, workshops, seminars and conferences will be conducted in a manner that promotes and respects freedom of speech and academic freedom ensuring that encourages legitimate academic enquiry and debate including the expression and exchange of opinion.
- When teaching potentially sensitive or controversial views or organising academic events such as research seminars, symposia or conferences the organiser should consider what steps should be taken to ensure that freedom of speech and academic freedom is promoted and protected by providing opportunities for students, staff or other participants to express an alternative point of view to facilitate scholarly debate that is mutually respectful of different perspectives or opinions.

¹ Such policies include admissions, staff appointments, reappointments and promotions, employment contracts, equality, diversity and inclusion, harassment and bullying, IT, including acceptable use policies, prevent policy and Staff and Student Codes of Conduct.

- Participants and visitors should be reminded of the Code of Conduct and their obligations under this Code of Practice in relation to the conduct of meetings and external events;
- An internal chair will be appointed for all events involving and external speakers and/or conferences and workshops;
- We will speak to students at the start of a lecture or seminar where it contains sensitive or contentious topics to explain this in advance.

6.2 Where the conduct of an activity or event and its participant(s) contravenes this Code and or does not constitute legal freedom of speech and where the freedom of speech constitutes hate crime or incitement to hatred or harassment the organiser is required to follow the procedure set out organisation of events in Appendix 1.

7. Application to hold meetings, events, conferences and demonstrations

7.1 The responsibility to promote and protect freedom of speech covers all events, public meetings, academic conferences, seminars and workshops organised by a member of staff, student group or individual organising events on behalf of the School or demonstrations held on School premises which must be organised in accordance with the approval procedure set out in Appendix 1. This process includes requesting and obtaining permission to hold the event, undertaking a risk assessment and any mitigations to protect free speech. In accordance with its legal obligations the School will not unreasonably refuse permission to hold an event or activity providing the expression of any views, beliefs and proposed conduct of a meeting remain within the law.

8. Roles and Responsibilities

- 8.1 The Board of Directors, as the School's governing body has a legal responsibility to promoting and protecting free speech and academic freedom and will take such steps as are reasonably practicable to secure free speech for all staff, students and visiting speakers. The Board must ensure that the School's premises are not denied to any individual or body on the grounds of their ideas or opinions or the objectives and beliefs of its members. In adopting this Code, the Board of Directors retains ultimate responsibility for freedom of speech while delegating operational responsibility to the School Director for ensuring that the Code is implemented in accordance with the School's legal and regulatory responsibilities and assigning specific responsibilities to individual managers.
- 8.2 All members of staff and students are responsible for familiarising themselves with this Code of Practice and associated policies and relevant Code of Conduct.
- 8.3 The HR Manager has specific responsibility to provide mandatory staff training and induction for newly appointed members of staff and tutors and regular (at least annual) updating for all members of staff and tutors and where appropriate conducting disciplinary proceedings against members of staff and/or tutors who contravene this Code.
- 8.4 The Director of Education has specific responsibility for freedom of speech in relation to education and research supported by the Head of Research.
- 8.5 The Registrar is responsible for providing general advice and guidance on freedom of speech matters, advising the Board on how its responsibilities are being discharged, providing an annual report on free speech matters.
- 8.6 Event organisers have responsibility for promoting and safeguarding freedom of speech, following the procedure for the approval of and conduct of events in accordance with this Code.

- 8.7 The Prevent Lead is responsible for coordinating the process for the approval of all events involving external speakers, convening event approval panels and maintaining documentary records of all stages involved in the process.

9. Non-disclosure Agreements

- 9.1 As part of our commitment to freedom of speech and in accordance with our legal obligations the School will not enter into any non-disclosure agreements in response to complaints made and/or upheld in relation to sexual misconduct, bullying or harassment.

10. Overseas funding

- 10.1 The Higher Education (Freedom of Speech) Act 2023 confers on the Office for Students (OfS) the duty to monitor the extent to which certain overseas funding presents a risk to freedom of speech and academic freedom and the School will review and update this Code of Practice to take account of any requirements that may apply to it following the publication of any further information on providers regulatory or legal obligations.

11. Breaches to this Code

- 11.1 Any breach of the Code shall result in the instigation of the staff or student disciplinary procedure as appropriate. Where the breach involves an invited speaker who is not a member of staff or employee the matter will be reported to the School Director who will decide on any further or subsequent action to be undertaken.
- 11.2 Where a breach occurs it is the responsibility of members of staff and students witnessing or being aware of the breach to take all reasonable steps to identify the individual(s) involved in the breach and report the matter to the Director of Education where this involves students or the School Director in the case of members of staff or visiting speakers.
- 11.3 Where breaches involve a legal breach the School will assist the police and Crown prosecution service in respect of any criminal charges.

12. Training

- 12.1 The Freedom of Speech Code of Practice is published on the website and the School's intranet. All students and staff will receive training on freedom of speech at induction and on an on-going basis as required. Training will also be made available to members of the Freedom of Speech Appeals Panel.

13. Complaints and Appeals

- 13.1 The School has a complaints and appeals process for students, staff or invited speakers who wish to raise a complaint regarding freedom of speech within the School.

14. Monitoring and review

- 14.1 This Code of Practice will be reviewed and updated once every three years or at earlier intervals in response to any legislative changes and IML's regulatory responsibilities. Academic Board and Finance and Resources Committee will also exercise an oversight role in relation to IML's ongoing compliance of its regulatory responsibilities, relevant to their respective remit through consideration of an annual report and will make a recommendation to the BoD on the IML's performance in executing its Freedom of Speech duties.

Appendix 1

Procedure for booking events involving an external speaker.

1. Purpose

- 1.1 The following sets out the procedure for events involving external speakers and demonstrations or protests. An external speaker means anyone who is not an employee or student invited to speak at the School, at School events or on its behalf at another location. The procedure sets out the approval process, the requirements governing the conduct of such events and the role of the event organiser and Chair. These procedures also apply to academic activities such as research conferences and seminars organised by the School but which involve external speakers and participants.

2. External Speaker approval Procedure

- 2.1 Any member of staff organising an event that will include an external speaker or involve external contributors must follow the process detailed below except for speakers who are invited to give lectures which form part of validated programme. Any member of staff inviting an external speaker is responsible for this decision and will be designated as the Event Organiser for this purpose. The Event Organiser should be mindful of their obligations under this Code of Practice, including the Prevent guidance. Currently only staff of the School can make external speaker bookings, or be a designated Event Organiser. All external speakers taking part in an event or activity hosted or organised by the School on-site or elsewhere, must act in accordance with these procedures and the Code of Practice on Freedom of Speech.
- 2.2 Prior to submitting a request for an external speaker, the Event Organiser will be responsible for assessing the external speaker against the following criteria:
- Has the speaker previously been prevented from speaking at Istituto Marangoni or other institutions because of their views or previously been known to express views that may be in breach of existing legislation or School policies?
 - Does the proposed title or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of existing legislation or School policies?
 - Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views which may be in breach of existing legislation or School policies or is known to hold controversial views?
 - Are there concerns that the activity or event may attract a potential protest by those opposed to the speaker, topic or event?
 - Are there concerns that the event may constitute a threat to public safety, public order or campus security?
 - An archive of external speakers will be retained by HR and by the Prevent Lead. Currently only staff can book external speakers and these industry contacts are usually known by staff in a professional capacity.
- 2.3 All applications should be submitted using the pre-authorisation form at least four weeks in advance of the event to the Prevent Lead. Late applications may not be accepted on the grounds that this may leave insufficient time to process the application and ensure the necessary arrangements including mitigation measures are in place. A copy of the proposed notice of the event should be provided with the application together with confirmation if any of the items referred to in 2.1 apply. The Prevent Lead will convene the approval panel for further consideration including reviewing the risk assessment and forwarding the Panel recommendation (refer 3.2 below) to the School Director for approval. The Prevent Lead will also refer advice or

recommendation received from the Safeguarding Steering Group to the Panel and will refer its final recommendation to the School Director.

- 2.4 Answers to all the above criteria should be used to inform the risk assessment for completion as part of the Speaker pre-authorisation form. The approval Panel will use the form and associated risk assessment to confirm any necessary mitigation measures. The approval panel will refer any high or specific risks for further advice by the Safeguarding Steering Group or Higher Education Prevent Lead, if necessary, prior to recommending to the School Director if the event can proceed.

3. Risk assessment and mitigation

- 3.1 In accordance with its legal duty to promote and protect freedom of speech the risk assessment should be approached from the perspective that the event is likely to be able to go ahead. As part of the risk assessment a judgement may need to be made between the duty to promote and uphold freedom of speech with the School's other legal obligations. In such instances this will involve identifying how to mitigate the risks including:

- Putting in place measures to allow an exchange of views through involving speakers with a range of views and perspectives;
- Implementing additional security or health and safety measures;
- Determining an appropriate location for the event and whether to place any restrictions on who may attend such as a staff or student only event;
- Additional measures to maintain good order through mechanisms for directing questions such as providing transcripts and proposed questions to the event chair and speaker in advance of the event.

- 3.2 The approval Panel, taking into consideration any recommendation from the Prevent Group will make a formal recommendation to the School Director whose decision shall be final. On receipt of the School's decision the Event Organiser will be responsible for confirming attendance with the external speaker, and arrange with them to speak at their event or activity. Approved Speakers will then be signed off by the London School Director. If granting permission for a higher risk event, the approval panel will confirm any additional measures or mitigations to manage any risks associated with enabling the event to proceed, including security and any other measures to be implemented. The Event Organiser is responsible for ensuring that speakers are informed of their responsibilities and for compliance with any conditions imposed by the School, including the briefing of the Event Chair if required. A copy of the proposed External Speaker's Presentation may be requested for review by the School's Safeguarding Steering Group or Prevent Lead in advance of confirming any booking.

- 3.3 Membership of the External Speaker Approval Panel includes:

- Head of Academic and Student Services Manager and Prevent Lead (Chair);
- Facilities Manager;
- Registrar or Nominee;

4. Withholding authorisation

- 4.1 The School reserves the right to withhold or withdraw permission for an external speaker from speaking at or attending an event, to refuse to permit an event and/or to halt an event at any time if it reasonably considers there may be a breach of this Code of Practice or of any legal obligation, or where the risk of such a breach cannot be mitigated. Reasons to consider declining or withdrawing permission to proceed may include the following scenarios emerging from completion of and consideration of the risk assessment:

- Where there are serious health and safety concerns for the speaker(s) or those in attendance which can't be mitigated;
- Where the speaker is likely to incite or spread hatred, including racial hatred, intolerance;
- Where the speaker or activity is likely to incite or engage in violence or cause a breach of the peace;
- Where the speaker or activity will promote acts of terrorism or promote individuals, groups or organisations that support terrorism or illegal purpose; including organisations appearing on the government's list of proscribed organisations;
- Where the activity will constitute a criminal offence or incite criminal acts;
- Where the views or ideas or the way they are expressed infringe the legally recognised rights of others, or breach legal provisions on non-discrimination;
- Where the speaker or activity is or likely to discriminate against or harass an individual or group on the grounds of gender, gender reassignment; race, nationality or ethnicity, disability, religious belief, sexual orientation, marriage or civil partnership, pregnancy, maternity or age.

- 4.2 Note: The expression of views which are unpopular, controversial or provocative, or which cause offence does not, if lawful, constitute grounds for the refusal or cancellation of an event or an invited speaker in which case through the approval process and associated risk assessment the School should identify mitigation measures that it can implement to enable the event to proceed. A key test is whether a proposed event is likely to give rise to an environment in which people will experience – or could reasonably fear – harassment, intimidation, verbal abuse or violence with particular reference to their protected characteristics under the Equality Act 2010. Similarly, no protest should automatically prevent an event from going ahead
- 4.3 The Facilities Manager or their nominee has authority over the conduct of all security activity conducted on the Premises. Where it is identified that an event poses a security risk to any person, facility or business process, the Facilities Manager or their nominee will provide or coordinate security arrangements for the event. They will act as the main point of contact for any necessary deadlines with the police. In addition, where security-related decisions need to be taken at very short notice – such as immediately prior to an event or where an event is under way – the Facilities Manager or their nominee has delegated authority to cancel, postpone or close an event, or impose whatever restrictions are necessary to ensure security, safety and the maintenance of good order. They will normally do so in consultation with the Event Chair, as long as circumstances allow.
- 4.4 Normally only the School Security Guards and officially-retained contractors may conduct security activity on the School's premises. The presence of any external security organisation on the School's premises and their role and conduct while on those premises must be authorised by the Facilities Manager or their nominee.
- 4.5 The School reserves the right to decide that practical considerations such as the cost, short notice period or difficulty of providing the necessary level of security may require an event to be modified, curtailed, postponed or – in exceptional circumstances – cancelled. The withholding or withdrawal; of permission will only occur in exceptional circumstances where reasonable measures cannot be put in place to secure freedom of speech within the law and wherever possible after consultations with the Event Organiser and appropriate internal and external parties as are deemed appropriate by the School. Where there are concerns about the event or activity or any associated protest, it should consider what measures might be put in place to mitigate or manage those risks. Withholding or withdrawing permission will only occur where it is not reasonable or practicable to put in place measures or mitigations to secure freedom of speech within the law and after consultation with the School Director and Prevent Group.
- 4.6 The School reserves the right to impose such conditions upon the use of its premises as are reasonably necessary for the discharge of its obligations relating to the safety, health and welfare of its registered students, employees and other persons lawfully upon the premises or for the

efficient conduct and administration of its functions. Conditions for events may include, for example, restrictions on access by those outside the School, or the provision of appropriate security.

5. Event Chair

- 5.1 Events that are open to others than current School staff and/or students or assessed as high risk should always be chaired by a suitable and experienced figure who is fully familiar with the School, meaning in principle an established (not visiting) or emeritus member of the School academic staff. Any exceptions to this should be approved by the Prevent Group. This may be requested even for a limited access event if appropriate.
- 5.2 The primary duty of the Event Chair at all School events is to promote and uphold freedom of speech within the law and to maintain good order throughout the proceedings. The Event Chair must adhere to the School's Code of Practice on Free Speech. The Event Chair should therefore always act impartially in their facilitation of discussion and debate.
- 5.3 At events where discussion is likely to be highly polarised and provoke especially strong feelings and responses, Event Organisers should consider whether it would be best for someone to chair the event who has not previously made their views publicly known. Event Chairs for events of this type must be willing to undertake the relevant preparation, in coordination with the support of relevant School staff, in the run up to the event.
- 5.4 The School reserves the right to reject a proposed Event Chair and require an Event Organiser to find a different Event Chair, but only if the proposed Event Chair is not a suitable and experienced figure who is fully familiar with the School or if there is evidence to provide reasonable grounds to believe that the proposed Event Chair has not acted impartially or upheld freedom of speech at previous events. Imposing a change of Chair requires the explicit approval of the Prevent Group and the reasons for it must be communicated in writing to the Event Organiser.

6. Conduct of the Event

- 6.1 The Chair and organiser of the event has a duty to ensure as far as possible that throughout proceedings all participants/attendees and the speaker(s) act to promote and uphold freedom of speech within the law. Ideas and opinions presented by the external speakers should be open to academic debate and attendees should have opportunities for any counter views to be expressed, and for the speaker to be challenged in an open and restrained manner. Event Chairs should take particular care to ensure that they act impartially and that they are seen to do so and while they may pose questions to the speaker(s) Event Chairs should not be a speaker at the event themselves or express their own views on the subject matter of the event.
- 6.2 Everyone who organises, speaks at or attends an event at the School is required to observe good order. Good order includes, but is not limited to, refraining from the following:
- Preventing participants from accessing or leaving events safely;
 - Preventing speakers from being heard clearly;
 - Chanting or using foul or abusive language, including racial abuse;
 - Refusing reasonable requests from an Event Chair, Event Steward or other School staff involved in managing an event;
 - Displaying flags, banners, placards or similar items in an event where they obstruct others from viewing the event or pose a risk to the safety of others;
 - Throwing any item;
 - Acting in any other way which is threatening or abusive, or which denies to others their right to legal free speech;

- Speakers or their guests must not incite hatred, intolerance, violence or call for others to break the law;
- Speakers or their guests are not permitted to encourage, glorify, or promote acts of terrorism including individuals, groups or organisations that support such acts or infringe the legally recognised rights of others;

The Event Organiser must ensure that the speaker(s) understand their obligations to abide by this Code of Practice, legislation and any relevant related internal policies.

6.3 In the event of any unlawful or unreasonably disruptive conduct the Chair or Event Organiser is encouraged to give appropriate warnings to maintain good order and in the case of continued unlawful conduct or infringement of the Code of Practice on Freedom of Speech, including stopping speakers from exercising their right to legal free speech, to require the removal of the individual(s) concerned. Such instances may lead to the initiation of disciplinary proceedings against these individuals.

6.4 If a speaker breaks the law, or incites others to break the law (such as sexually harassing an attendee, using hate speech or other forms of harassment or does not have due regard to the need to prevent someone from being drawn into terrorism or threatens violence) the Chair or Event Organiser is responsible for calling the police or security assistance to prevent serious disorder and informing the Facilities Manager.

7. Complaints procedure

7.1 In the event that a member of staff makes an allegation of a breach of this Code of Practice, they have the right to make a formal complaint, in writing, to the HR Manager. This procedure operates in conjunction with existing IML procedures (for example, Student Complaints, Staff Grievance and Whistleblowing procedures) where issues of freedom of speech and academic freedom are possible complaints requiring investigation (including but not limited to):

- Allegations that IML has infringed a person's of freedom of speech, freedom of expression and/or academic freedom;
- Allegations that a person has breached the terms of this Code of Practice or has otherwise acted in a manner contrary to the law or IML applicable policies and procedures.

7.2 In the event that the HR Manager determines that any matter raised has adverse or potentially adverse consequences in relation to IML's compliance with its statutory or regulatory duties and/or this Code of Practice, they may make recommendations to any relevant person with a view to ensuring that IML adheres to its legal and regulatory duties and this Code of Practice.

8. Appeals procedure

8.1 The withholding of permission or withdrawal of permission for an event will only occur in exceptional circumstances where measures or mitigations cannot be put in place to secure freedom of speech within the law and wherever possible after consultation with the Event Organiser and appropriate internal or external parties as are deemed appropriate by the Prevent Group. Appeals against a decision taken under this Code of Practice may be made in writing to the School Director within five working days of the decision. The School Director may delegate consideration to an Investigating Officer or a Freedom of Speech Panel. The decision of the School Director, based where applicable on the recommendation of an appointed independent Investigating Officer or Freedom of Speech Appeals Panel, will be final. A further appeal may be

made to the OIA (for student complaints) or Office for Students in accordance with their Complaints Scheme (for members of staff).

8.2 A Freedom of Speech Appeals Panel will comprise:

- A manager not involved in the initial decision making or risk assessment;
- Two academic members of Academic Board;
- A student member (for student related appeals)

All panel members must not have been involved in the original approval process or its associated risk assessment.

9. Discipline

9.1 Any contravention of the provisions of this Code of Practice will render the individual responsible to the relevant staff or student disciplinary proceedings. Where any actions involve breaking the law the School reserves the right to involve the Police and/or any other relevant authorised bodies and will assist the authorities in implementing or supporting due legal process.

10. Data Sharing

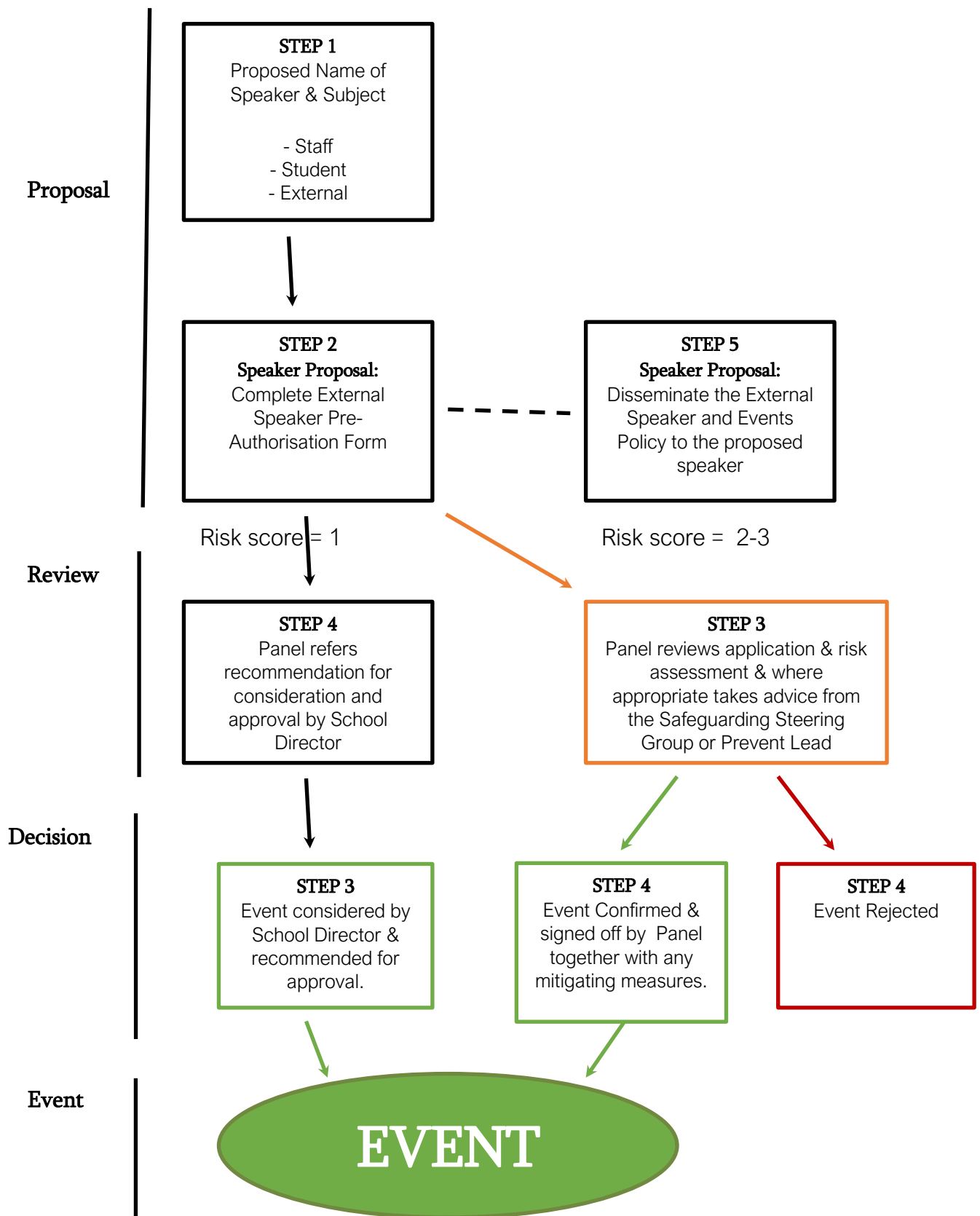
10.1 Where it is appropriate and legal to do so, IML may share information and data with third party organisations, as authorised by the School Director.

11. Social Media

11.1 This Code of Practice applies to the use of electronic and social media at IML and the School requires responsible and legal use of the technologies and facilities available to staff, students, and visitors, including the internet, email and social media platforms. Please refer to IML's IT Policy for more information.

APPENDIX 2

EXTERNAL SPEAKER POLICY PROCESS – 4 WEEKS



Istituto Marangoni London

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Istituto Marangoni Limited Registered Office: 30 Fashion Street · London E1 6PX · Registered in England & Wales no. 4551096

Registered v.a.t. no. gb 810274857

APPENDIX 3
EXTERNAL SPEAKER PROPOSAL PRE AUTHORISATION FORM

Proposed by (staff):

Staff signature:

Date:	
Time:	
Venue:	
Type of event (circle):	☐ Careers Introduction ☐ Career Development ☐ External Event
IT / AV / Equipment other:	
Fee level (proposed):	☐ £0 / Voluntary ☐ £120 ☐ £ other (rationale)
Lecture / Event Duration:	
Lecture / Event Title:	
Guest Speaker:	
Company:	
Short bio (for marketing):	
Copy of CV (attached):	☐ YES ☐ NO
Classes to invite:	☐ FB ☐ FS ☐ FD ☐ 1A ☐ 1 ☐ 2 ☐ 3
Total amount of students (est):	
Tutors to publicise:	
Other relevant info:	
Prevent Duty Assessment (0-4): see staff guidance	☐ 0 ☐ 1 ☐ 2 ☐ 3 ☐ 4

REVIEW

Speaker Reviewed by:

Decision: ☐ APPROVE

☐ REFER

☐ NOT APPROVED

Signature:

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APPENDIX 4

EXTERNAL SPEAKER RISK ASSESSMENT			
RISK LEVEL	CONSIDERED RISK	EVIDENCE (SUCH AS)	ACTION REQUIRED
1	Low	Speaker is known expert in their field and is not known to be controversial. The topic is not controversial or likely to be offensive to anyone. Speaker has previously participated at events at IML and no contentious history is known or disclosed. Presence of speaker on IML premises is unlikely to be regarded as controversial or provocative. Access to the event is limited to IML staff and students only. The event is unlikely to attract adverse media attention or require staff or security presence.	Panel assessment. If approved: 1. Speaker abstract requested in advance.
2	Moderate	No CV attached or sourced or limited information about the speaker or topic which raises concerns.	Panel assessment. If approved:

		CV is attached or sourced and indicates potential risk of controversy or the speaker has previously been refused permission to speak at IML or elsewhere. The topic may not be regarded as controversial but the event is open to non-IML parties and the attendance is likely to be high – particularly the general public. There may be risk of adverse media attention or need for security to be in attendance, or restrictions imposed (e.g., ticketing) The event is being held by or sponsored by IML at an external venue.	1. Speaker abstract requested in advance. 2. Clear guidance to staff, students and other participants in advance. 3. Fully monitored & moderated during visit.
3	High	The Speaker and/or topic are highly controversial and will definitely attract media attention. The proposed topic/scope of the event or speaker themselves present a risk that the opinions expressed are likely to encourage the expression of views in breach of relevant legislation. Are there concerns the event may constitute a threat to public safety, public order or security that cannot be mitigated. The event will breach criminal law (e.g. inciting or promoting terrorist activity, hate crimes, discriminatory behaviour, harassment or breaches of the peace).	Refer to Prevent Group Identify mitigation measures to enable the event to proceed or refuse event if risk cannot be mitigated. Not Admitted on School Premises. Refer to Prevent Group Refuse permission unless clear mitigation & preventative measures are identified including those

			responsible for implementation. Refuse permission.
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Risk Assessment calculation

Scores

Each risk should be given a score against: 1) likelihood and ii) severity in accordance with the following scoring method:

Low risk 1

Medium risk 2

High risk 3

An overall score should be calculated by multiplying the severity of the risk if the risk occurs by the likelihood that it will occur.

APPENDIX 5

IML RELATED POLICIES AND REGULATIONS AND LEGISLATIVE CONTEXT ON LEGAL AND REGULATORY FRAMEWORK

IML related policies

IML Articles of Association

BoD Statement of Primary Responsibilities

IML Preventing and Addressing Harassment and Sexual Misconduct Policy (Students) 2025-2026

Student Code of Conduct and Disciplinary Procedures

Staff Code of Conduct and Disciplinary Procedures

IML Safeguarding Policy

IML Health and Safety Policy

IML Disability Policy

IML Dignity at Work and Study Policy

Legal and regulatory framework

Communications Act 2003

Education Act (No 2) 1986

Higher Education and Research Act 2017

Higher Education Freedom of Speech Act (2023)

Human Rights Act 1998

Equality Act 2010

Articles 9, 10 and 11 of the European Convention on Human Rights and Human Rights Act 1998

Counter Terrorism and Security Act 2015 (Prevent Duty)

and Terrorism Acts of 2000 and 2006

Malicious Communications Act 1988

Online Safety Act 2023

Public Order Act 1986 and Public Order Act 2023

Protection from Harassment Act 1997

Data Protection Act 2010

Office for Students Regulatory Framework Public Interest Principles

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