



# Oakswood College

Empowering Through Education



## Freedom of Speech

### *Code of Practice*

PROMOTING EXCELLENCE • ENSURING COMPLIANCE  
SUPPORTING OUR COMMUNITY



GOVERNANCE



QUALITY



COMPLIANCE



EXCELLENCE



**Oakwood College**  
Empowering Through Education

*(Trading name of Oakwood Group Ltd)*

## Code of Practice on Freedom of Speech

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<b>Related Policies</b>	Freedom of Speech Complaints Procedure; Policy on Sexual Misconduct, Harassment & Unacceptable Behaviours, EDI Policy; Student Code of Conduct; Staff Code of Conduct, Prevent & Safeguarding Policy and Procedure; Student Complaints Policy & Procedure; Non-Academic Misconduct Policy & Procedures; Staff Disciplinary Procedure; Student Terms and Conditions
<b>Related Appendices</b>	Appendix A – Proposed Event Request Form Appendix B – Proposed Event Risk Assessment Template
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## TABLE OF CONTENTS

1. Introduction .....	2
Other relevant legislation, requirements and guidance in addition to the above .....	3
2. Freedom of Speech in Practice .....	3
Our institutional values and commitments in relation to lawful free speech and academic freedom .....	3
Key Definitions relevant to this Code of Practice .....	4
General Principles governing this Code of Practice.....	5
3. Institutional Duties and Responsibilities .....	6
Arrangements to secure academic freedom and freedom of speech .....	6
1. Practical steps and initiatives .....	6
2. Non-Disclosure Agreements.....	7
3. Academic courses of study, academic research, staff and student academic and non-academic policies and procedures.....	7
4. Funding .....	8
4. Scope and Application .....	8
Training and induction .....	8
5. Proposed Events, Meetings and Other Activities .....	8
Panel Risk Assessment of Proposed Events .....	9
6. Procedures for Visiting Speakers and Events .....	10
Overview of the procedures .....	10
Application .....	11
Risk Assessment and Decision.....	11
Deferred Panel decisions on Proposed Events .....	12
7. Appeals .....	13
Requested Review of a Panel Decision.....	13
Grounds to substantiate a Request for Review.....	13
8. Complaints regarding Freedom of Speech .....	14
9. Data Protection and Information Handling .....	15
10. Monitoring and Review .....	15

### 1. Introduction

This Code of Practice sets out how Oakswood College upholds and secures freedom of speech and academic freedom in accordance with the following statutory and regulatory requirements:

- **Education (No.2) Act 1986 (Section 43)**
  - Imposes a duty to take "reasonably practicable" steps to secure freedom of speech within the law for staff, students, and visiting speakers.
  - Requires that institutional premises are not denied to individuals or groups based on their beliefs, views, or objectives.
  - Mandates the publication and maintenance of a Code of Practice detailing procedures for meetings and required conduct relating to activities on institutional premises.
  
- **Higher Education (Freedom of Speech) Act 2023**
  - Strengthens duties on higher education providers to protect freedom of speech and academic freedom.
  - Establishes a direct statutory duty on higher education providers to take "reasonably practicable" steps to secure lawful freedom of speech for staff, students, members, visiting speakers, and all persons lawfully on premises.
  - Requires governing bodies to maintain, update, and actively promote a comprehensive Code of Practice covering:
    - Processes for arranging and managing meetings/events (on premises and under the provider's name elsewhere), including risk assessment and notifications.
    - Standards of conduct and actions in case of interference or disruption of lawful speech.
    - Procedures for handling breaches, complaints, and appeals related to freedom of speech.

The 2023 Act prohibits restrictions on speech unless unlawful or reasonably justified under UK legislation (e.g. terrorism prevention, harassment, equality law). It also confirms a presumption in favour of enabling lawful speech, even if controversial or unpopular.

As well as providing a useful framework to ensure lawful freedom of speech is uninhibited in our institution, this Code of Practice is intended to be used to support our institutional community to understand what is expected, required and permissible, as well as to give confidence to all members of our community about freedom of speech and academic freedom.



### ***Other relevant legislation, requirements and guidance in addition to the above***

- [OfS Freedom of Speech Regulatory Advice 24 \(Guidance Related to Freedom of Speech\)](#)
- [Protection from Harassment Act 1997](#)
- [Higher Education & Research Act 2017](#)
- [Human Rights Act 1998 \(Article 10\)](#)
- [The Equality Act 2010](#)
- [OfS E6 Condition of Registration](#)
- [OIA Good Practice Framework](#)
- [UK GDPR and Data Protection Act 2018](#)
- [Prevent Duty guidance for higher education institutions in England & Wales 2015 \(updated 2024\)](#)
- [Terrorism \(Protection of Premises\) Act 2025](#) (implementation date tbc as at August 2025)
- [Terrorism Act 2000](#)

## **2. Freedom of Speech in Practice**

### ***Our institutional values and commitments in relation to lawful free speech and academic freedom***

Our College is committed to protecting academic freedom and lawful freedom of speech for all staff, students, external speakers, and event attendees, implementing all statutory duties and guidance above, and all members of our community, including visitors, are expected to follow this Code of Practice.

Both free speech and academic freedom are fundamental, multi-faceted and intersectional, and as such require a holistic approach across the institution. They enable our staff and students to examine, explore, test and challenge established knowledge, received and perceived wisdom, the concepts that shape local and global societies, and our explanations for how we understand the world around us.

Nothing in our commitment to freedom of speech and academic freedom is an excuse for any of the following unlawful behaviours:

- Abuse
- Bullying
- Discrimination
- Harassment
- Hatred
- Intimidation
- Violence

- Any other unlawful behaviour

In implementing this Code of Practice, all staff and students of our community should feel free to examine, explore, test and challenge ideas, freely and without fear, both individually and collaboratively, and we commit to upholding these principles. This also means that members of our institutional community may, from time to time, be confronted with speech and ideas that they might find offensive, shocking, challenging or disturbing, but finding it so does not automatically mean such speech is unlawful.

Similarly, academic staff and students have the right, within the law, to question and test received views and wisdom, as well as to put forward new ideas which may be controversial and/or unpopular, whether in formal or informal institutional settings such as committees or departmental staff meetings, or in research publication submissions or fora. We commit to academic staff being allowed to do so without fear of recrimination, losing their jobs, or prospects of promotion or other roles at Oakwood College being affected. Equally, we commit to students being allowed to do so without fear of recrimination, disciplinary action, academic penalty, or future study or other prospects at our college being affected.

Notwithstanding these commitments, this does not mean that all academic theories, concepts and ideas are equally valuable, and academic work created and produced by both students and staff should always be done so in accordance with our institutional expectations on academic rigour and academic integrity. Students who put forward lawful controversial or unpopular opinions in academic work should not suffer any detriment, academic or otherwise, on the basis of having made such representations. Academic work will always be marked as normal in accordance with the relevant assessment rubric and marking criteria for the level in question.

Where an individual poses concerns, either written or verbal, that might reasonably fall within the scope of our institutional Prevent Duty obligations, or give cause for Safeguarding concerns, the relevant procedures under our Prevent & Safeguarding Policy will be followed.

### ***Key Definitions relevant to this Code of Practice***

- **Free Speech** - is defined in [Article 10 of the Human Rights Act 1998](#) as the right to freedom of expression, which includes the “freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers”. It includes written materials and other forms of expression and is not limited to the spoken word.
- **Academic Freedom** - [as defined by the Office for Students \(December 2022\)](#) is the principle that academic staff are free within the law to question and test received wisdom and put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or the privileges they may have at



their [institution]. Academic freedom is a component of, rather than being entirely distinct from, freedom of speech.

- **Lawful speech** - speech that is permitted unless it is restricted by law, even though it may be offensive and hurtful to some. It is protected by UK law.
- **Unlawful speech** - speech that amounts to unlawful harassment, unlawful discrimination and/or hate speech and incitement to hatred. Such speech does not constitute free speech within the law and thus it is not protected by UK law.
- **Non-Disclosure agreement (NDA)** - a non-disclosure agreement (sometimes also known as a 'confidentiality clause') constitutes any agreement which prevents or would prevent a complainant survivor of sexual misconduct, harassment or other unacceptable behaviours, from publishing or sharing information (including talking) about their complaint.
- **Proportionate restrictions** - in accordance with our institutional statutory and regulatory requirements, any institutional decision/action that may either directly or inadvertently restrict free speech with regard to any event or incident, must be proportionate in accordance with any risk(s) posed, and should be reported to Board of Governors of Oakswood Group Ltd for monitoring, in accordance with its monitoring schedules and compliance with the OfS' Reportable Events requirements.
- **Proscribed group(s)** – Under UK law, a proscribed group is an extremist group/organisation that is banned by law because it has been deemed by the UK government to be involved in terrorism. It is illegal to belong to, support, or invite support for a proscribed organisation.

### ***General Principles governing this Code of Practice***

1. No individual shall be denied access to premises, facilities, or platforms solely because of their lawful beliefs, views, or opinions.
2. Individuals have the right to peaceful protest and persuasion, and to both speak and dissent lawfully.
3. No person may disrupt or attempt to prevent lawful speech by others except through reasonable, peaceful persuasion or lawful processes. The right to freedom of speech does not include the right to disrupt or silence others, provided that the means of objection, counter and/or alternative perspectives is peaceful and lawful.
4. Speech or conduct amounting to harassment, unlawful discrimination, incitement to violence, or criminal offences is not protected and will be addressed accordingly.
5. Institutional policies may restrict disruptive actions as long as they preserve the rights of individuals to freedom of expression and protest that is both lawful and peaceful.

6. Our College complies with its Safeguarding duties and Prevent responsibilities and these factors will be taken into account when determining any action in accordance with this Code of Practice.
7. Staff involved in making decisions where there may be freedom of speech implications/considerations will have this Code of Practice explicitly drawn to their attention, be supported appropriately and relevant training will be made available where necessary.

### **3. Institutional Duties and Responsibilities**

By following this Code of Practice, Oakwood College will:

- Take reasonably practicable steps to secure freedom of speech within the law in line with the legislative and statutory requirements set out above;
- Promote freedom of speech and academic freedom as fundamental institutional values;
- Maintain, regularly review, and publish this Code of Practice, updating promptly in response to legal and regulatory changes as required;
- Prohibit NDAs relating to complaints of harassment or sexual misconduct;
- Ensure all decisions regarding event approvals, conditions, or refusals are recorded with clear written justifications that take account of statutory duties and regulatory guidance;
- Provide transparent, accessible procedures for event arrangements including risk assessment.

#### ***Arrangements to secure academic freedom and freedom of speech***

We ensure our commitment to securing freedom of speech and academic freedom is reflected in our institutional operations as follows:

##### **1. Practical steps and initiatives**

We will:

- a) Ensure that this Code of Practice is explicitly brought to the attention of new students during registration/induction, and new staff during their induction;
- b) Remind students annually on re-enrolment of this Code of Practice;
- c) Disseminate any updated versions of this Code of Practice to all students and staff once formally approved;
- d) Consult with staff and students in the course of any review of this Code of Practice;
- e) Use the results of any relevant surveys (e.g. National Student Survey; annual staff survey) to gather staff and student views on whether freedom of speech and

academic freedom at our Oakwood College are being adequately protected, and determine any necessary action arising from such findings;

- f) Ensure that when new policies and procedures are introduced, consideration is given to any impact they may have on freedom of speech and/or academic freedom;
- g) Ensure that all staff are supported to understand and exercise their responsibilities towards freedom of speech and academic freedom, recognising that some such roles may require additional training and support;
- h) Report any concerns regarding academic freedom and/or freedom of speech to Board of Governors of Oakwood Group Ltd for monitoring, including:
  - i. all complaint findings and outcomes from complaints submitted under the Freedom of Speech Complaints Procedure
  - ii. Annual reporting on Proposed Events Risk Assessments and all related findings and outcomes of Requests for Review of Panel decisions

## **2. Non-Disclosure Agreements**

Our College will not use, nor enter into, non-disclosure agreements related to complaints about harassment, bullying, sexual misconduct or other unacceptable behaviours.

## **3. Academic courses of study, academic research, staff and student academic and non-academic policies and procedures**

Our College will ensure that its teaching, curriculum, policies and procedures reflect our duties to ensure, so far as is reasonably practicable, lawful freedom of speech and academic freedom. We will do so in the following ways:

- i. Our processes for course development, course approval, quality assurance and academic assessment will respect the rights of freedom of speech and academic freedom;
- ii. Our processes for facilitating academic research by staff and students will respect the rights of freedom of speech and academic freedom;
- iii. Our staff disciplinary processes and student misconduct processes will respect freedom of speech and academic freedom.

## **4. Funding**

The terms of certain funding, including any funding from private donors, endowments, gifts, research grants and contracts, and educational or commercial partnerships, may carry implications that present a risk or potential risk to freedom of speech and/or academic freedom. To secure freedom of speech and academic freedom in our

institution, therefore, we have processes in place to identify where such risks may present themselves and to manage these appropriately, including processes to meet our statutory and regulatory funding requirements. Please see our Anti-Bribery, Fraud and Corruption Policy for relevant information.

#### **4. Scope and Application**

This Code of Practice applies to:

- All staff (including visiting, honorary, part-time, and support staff)
- All students (full and part-time, UK and international, campus-based and transnational)
- Contractors, visitors, attendees, and external speakers involved in any institution-affiliated event or activity
- All events or activities occurring on or off institutional premises but organised in the institution's name or under its authority

##### ***Training and induction***

We recognise the need to ensure that all staff understand and are supported to exercise their responsibilities towards lawful freedom of speech and academic freedom. Some roles may have functions that directly involve securing freedom of speech and academic freedom, and we commit to supporting those staff who require necessary additional training and support.

All staff will have this Code of Practice explicitly drawn to their attention during induction and any updated versions will be overtly disseminated to all staff once approved.

#### **5. Proposed Events, Meetings and Other Activities**

In line with our obligations and commitments to securing lawful freedom of speech and academic freedom, we have a general expectation that all proposed events, meetings and other activities, including those involving guest/external visiting speakers, will be facilitated to ensure that lawful views, ideas and opinions can be shared.

This includes ensuring that, so far as is reasonably practicable to secure freedom of speech, no event nor premises of Oakwood College will be denied to any individual or body on any grounds connected with:

- The lawful ideas or opinions of that individual
- The lawful policy or objectives of an organisation or the lawful opinions of any of its members

This notwithstanding, there may be some exceptional circumstances where further work or additional measures are required to be put in place to facilitate freedom of speech and/or to ensure that certain visiting speakers do not break the law, or breach the lawful rights of others (e.g. violating rights under the Human Rights Act 1998).

### ***Panel Risk Assessment of Proposed Events***

All proposed events shall undergo a risk assessment by a Panel (see Section 6, Procedures for Visiting Speakers and Events, below). It shall be reasonable of the Panel to refuse approval for an event where, following a risk assessment, the Panel reasonably believes (from the nature of the speaker(s) or from similar activities in the past whether held internally or externally) that:

- a) the views likely to be expressed by a speaker are contrary to the law;
- b) the intention of any speaker is likely to be to incite breaches of the law or to intend breaches of the peace to occur;
- c) the event will, or is likely to, include the denial of the right to hold or to express an opposing view or opinion;
- d) a speaker and/or the organisation they represent, advocates or engages in violence and/or extremism in the furtherance of political, religious, philosophical or other beliefs;
- e) the views likely to be expressed by a speaker are for the promotion of any illegal organisation or purpose, including organisations listed on the UK government list of proscribed terrorist groups/organisations;
- f) it is in the interest of public safety, the prevention of disorder or crime, and/or the protection of individuals lawfully on institutional premises, for the event not to proceed.

Where the Panel is satisfied that the otherwise lawful expression of views at a proposed event is likely to give rise to disorder or pose real threat to the safety of event participants or anyone else, it will consider what steps are necessary to ensure the safety of all parties and the security of the premises where these are Oakwood College premises (rather than an external location), and the Panel may approve an event with conditions. Such steps/conditions may include, for example:

- requirements as to the provision of security;
- additional staffing/stewards;
- a speaker being part of a panel rather than solo;
- ensuring that a member of senior staff is in attendance;
- considerations as to the most appropriate venue for the event;
- additional information being sought and provided before a final decision is made about how the event can proceed.

Where, following its risk assessment, the Panel reasonably concludes that imposing conditions would not be sufficient to prevent serious disorder and the likelihood of actual harm/threat to individuals, it may decline to approve and authorise the proposed event.

Every individual involved in participating and/or attending an event at Oakswood College, or an external event organised by the College or in its name, is required to conduct themselves appropriately and observe good order. Staff and students are required to ensure they behave in accordance with the relevant codes of conduct. Good order includes, but is not limited to, refraining from the following:

- preventing individuals from accessing events;
- preventing speakers from being heard clearly;
- using intimidating, threatening, foul or abusive language of any kind, including in writing/placards/banners/posters or other means;
- refusing reasonable requests from an event chair or other institutional staff involved in managing an event;
- acting in any way which denies others their right to lawful free speech.

Other than in exceptional circumstances, the costs of security (whether in whole or in part) relating to use of Oakswood College premises by or in connection with a visiting speaker who has been invited by the College (which includes being invited by an Event Proposer) shall not be passed to the person(s) arranging the event. The CEO shall determine whether the circumstances are deemed exceptional, and where such costs are not fully borne by the institution, clear reason(s) shall be given for this decision.

## **6. Procedures for Visiting Speakers and Events**

All events involving external speakers or open to the public require a formal, written application submitted via the designated institutional process set out below. The process is transparent, evidence-based, timely, and decisions on the proposed event will be underpinned by clear reasons that are communicated to event proposers.

### ***Overview of the procedures***

- We have a two-step process for the authorisation of visiting speakers and events as follows:
  - Application for proposed event (see Appendix A - Proposed Event Request Form)
  - Risk-assessment and Decision

### ***Application***

- For any event that someone wishes to organise or request an event, a proposal should be submitted using the Proposed Event Request Form (**Appendix A** to this Code of Practice on Freedom of Speech).

The Event Proposer will be asked to provide relevant necessary information that will allow Oakswood College to understand what is being proposed and conduct an appropriate risk assessment. The Event Proposer provides this information to Oakswood College using the Proposed Event Request Form, broadly covering the following:

- Event title, date, time, venue, and audience.
  - Brief outline of proposed speaker(s), event content/topic and objectives.
  - Event format, and management/chairing arrangements
  - Relevant information/considerations
- Once completed and received, the proposed event request will be reviewed and either:
    - Further information sought from the proposer, or
    - The request will proceed to the Risk Assessment process (see **Appendix B** to this Code of Practice on Freedom of Speech).

### ***Risk Assessment and Decision***

On receipt of a Proposed Event Request Form, a Panel will conduct a risk assessment using Appendix B to this Code of Practice. The CEO will appoint 2 or 3 members of staff to act as the Panel members, one of whom shall be a senior member of staff who will be appointed as the Panel Lead.

On completion of the Risk Assessment, the Panel will decide whether the event:

- is approved;
- is approved with conditions;
- is not approved.

Where the Panel determines that Where a proposed event is approved with conditions, any conditions set must be proportionate, reasonable and achievable. In conducting the Risk Assessment and reaching their decision about whether and how the Event can proceed, the Panel will:

- Consider all relevant information made available to it
- Set out clear reasons to explain how decisions have been reached
- Record any considerations
- Consider what measures might reasonably be taken/implemented to mitigate any specific/particular risks
- Seek any relevant information necessary to reach a decision from the Event Proposer and/or any other source, as applicable

If risks can be reasonably mitigated, approval will be granted; otherwise, conditions may be imposed or approval refused with clear, written reasons. In reaching its decision, the Panel will be mindful of both the institution's legal obligations and the relevant statutory and regulatory guidance regarding Freedom of Speech (see Section 1 of this Code of Practice for details of relevant legislation and guidance).

**Panel decisions will not be based on potential offence or on personal or foreseeable disagreement with views expressed that may be offensive and/or hurtful to some but which are lawful.**

Events assessed as Substantial or Extreme require referral to senior management for review, and may require additional security, or may be refused if risks cannot be adequately mitigated.

On completion of the decision-making process, the Panel Lead will write to the Event Proposer, setting out the Panel's decision and its reasoning. They may, if they choose, do this by sharing a copy of their completed Proposed Event Decision Form (this can be found in Appendix B) with the Event Proposer.

On communicating its decision to the Event Proposer, the Panel will notify them of their right of appeal in the event of dissatisfaction with the Panel's decision (see below for the relevant appeal process).

All Panel decisions (including completed Risk Assessments) will be submitted on a regular basis to Board of Governors of Oakwood Group Ltd for monitoring and review, in accordance with its monitoring cycles.

Once approved, the proposer will send the 'Oakwood College External Speaker Code of Conduct (Do's & Don'ts)' to the speaker.

### ***Deferred Panel decisions on Proposed Events***

The Panel may defer a decision pending further information that must be provided within a reasonable timeframe specified by the Panel. The timeframe provided by the Panel may differ according to the timing of the proposed event.

The Panel Lead may, where feasible, extend any agreed deadline as they deem reasonable and appropriate (e.g. to facilitate the Event Proposer being able to submit any requested additional information). However, the Panel Lead may decline to give any such extension if doing so would foreseeably cause subsequent problems in the organisation of the Event, or pose other obstacles that would make an extension to the deadline unreasonable.

Where further information has been sought by the Panel to inform its final decision, but:

- has not been provided by the Event Proposer by the specified deadline
- has not been provided by another party it has been requested from, and/or

- is for any reason not available

the Panel will proceed to reach its final decision on the basis of the information available to it.

On communicating its decision to the Event Proposer, the Panel will notify them of their right of appeal in the event of dissatisfaction with the Panel's decision (see below for the relevant appeal process).

## **7. Appeals**

In accordance with the [OfS Guidance on Freedom of Speech](#) (para 187 Regulatory Advice 24), Event Proposers (whether staff or students) may request a review of the Panel's decision to refuse an event or to approve it with conditions, by following the process set out below.

External parties (e.g. Speakers) do not have the right of appeal against an institutional decision regarding a Proposed Event, however they do have the right of complaint (see below).

As there is an institutional Freedom of Speech Complaints Procedure, the following appeal process is designed to be a light-touch mechanism to facilitate a review of the Panel's decision.

### ***Requested Review of a Panel Decision***

This procedure is designed to facilitate a swift review of the Panel's decision by The CEO or their nominee. It is not an opportunity or mechanism for a full reassessment of the event risk(s), but a procedural check and proportionality review.

Event Proposers may request a review of the Panel's decision by the CEO. The CEO may, if they wish, appoint a senior member of staff to carry out the review on their behalf.

To request a review, the Event Proposer should submit an email to the CEO, together with a copy of all documentation, including:

- their original request form
- the Panel's written decision and outcome

On receipt of the request, the CEO will request a copy of the Risk Assessment.

### ***Grounds to substantiate a Request for Review***

To ensure a proportionate approach, there is no need for the Event Proposer to make a substantial submission in requesting a review. However, they should clearly set out in their email the grounds for the request, which should be one or more of the following grounds:



- a) **Procedural Irregularity:** *The risk assessment process was not properly followed, or required procedures (as set by institutional policy or code of practice) were not observed.*
- b) **Insufficient or Flawed Evidence:** *The decision was based on incomplete, inaccurate, or misinterpreted evidence, and/or Relevant evidence in support of the event or speaker was not considered.*
- c) **New Evidence:** *Significant new information or evidence that should be taken into consideration has since become available that was not included or available during the initial risk assessment.*
- d) **Unreasonable or Disproportionate Decision:** *The decision to refuse the event was unreasonable, overly cautious, or disproportionate in relation to the actual risks and available mitigating actions.*
- e) **Inadequate Consideration of Mitigating Actions:** *The Panel did not sufficiently consider reasonable measures or conditions that could have enabled the event to proceed safely and lawfully.*
- f) **Potential Misapplication of Policy:** *The decision relied on factors not permitted by institutional policy (e.g., risk of lawful views causing offence or disagreement, which is not a proper basis for refusal) and/or Freedom of Speech principles were not appropriately balanced or protected as required.*
- g) **Bias or Conflict of Interest:** *There is evidence that the decision-makers may have had a conflict of interest or demonstrated bias in the assessment.*

A request for a review may be made on one or more of these grounds. A clear explanation for each ground should be provided together with any relevant supporting evidence.

## 8. Complaints regarding Freedom of Speech

Complaints alleging unlawful restriction of freedom of speech should be submitted under our institutional Freedom of Speech Complaints Procedure

<https://oakwoodcollege.co.uk/policies.html>.

All complaints will be handled impartially, promptly, and transparently, providing detailed written responses and clear pathways for escalation.

Frivolous or vexatious complaints will normally be dismissed at the point they are deemed to be frivolous and/or vexatious by the College, irrespective of whether any procedures have formally commenced or are underway.

Student complainants may refer unresolved matters to the Office of the Independent Adjudicator. The College will issue Completion of Procedures accordingly.

Complainants who are staff or who are persons external to Oakwood College may complain to the Office for Students (see <https://www.officeforstudents.org.uk/for-providers/freedom-of-speech/freedom-of-speech/raising-concerns-about-free-speech/>).

Records of complaints and their outcomes will be securely maintained for regulatory compliance and audit, and will be monitored by Board of Governors of Oakwood Group Ltd.

## **9. Data Protection and Information Handling**

Personal data relating to speakers and event attendees will be processed lawfully in accordance with the UK GDPR and the Data Protection Act 2018, solely for the purposes of event administration, Safeguarding, and legal compliance.

Data sharing with third parties will only take place where necessary, and will have a clear lawful basis, be appropriately recorded, and respect individuals' privacy rights.

Anonymised data will be shared with the Board of Governors and Academic Board for the purposes of monitoring, evaluation and assurances (see Section 10 of this Policy, below).

## **10. Monitoring and Review**

The Office for Students Freedom of Speech Guidance ([Regulatory Advice 24](#)) sets out that:

*“Providers and constituent institutions should record all decisions that are likely to have a substantial (positive or negative) effect on freedom of speech within the law. These records should demonstrate how the provider or constituent Oakwood College has had particular regard for the importance of freedom of speech within the law. Wherever reasonably practicable, records should be kept for as long as necessary to be available for external review (for instance, through judicial review, a regulatory investigation or a relevant complaint process).”*  
[Paragraph 190]

To ensure compliance by the College:

- An annual report on Freedom of Speech will be submitted to the Board of Governors for monitoring and review of this area, together with any recommendations for consideration.



In order to satisfy the College that lawful Freedom of Speech and Academic Freedom are being secured, and to facilitate Oakwood College to identify any issues undermining its ability to secure lawful Freedom of Speech and Academic Freedom, and determine any necessary proportionate action, all of the following will be submitted for monitoring and review on an annual basis to the Board of Governors, as part of the annual report on Freedom of Speech:

- All complaint findings and outcomes from complaints made and/or considered under the Freedom of Speech Complaints Procedure;
  - All Proposed Event Risk Assessments and Panel Decisions;
  - All findings and outcomes arising from Requests for Review of Panel Decisions (Proposed Events).
- 
- This Code of Practice will be reviewed at least every three years, and on an ad hoc basis in the event of any relevant legislative and/or regulatory changes.
  - The Board of Governors is responsible for reviewing, monitoring and approving this Code of Practice, alongside ensuring that any reporting or other relevant compliance requirements are met.
  - Whilst the Board of Governors is ultimately responsible for reviewing this Code of Practice, reviews shall also include consultation with staff and student representatives.
  - Updated versions of this Code of Practice shall be appropriately disseminated and explicitly brought to the attention of both staff and students.