Freedom of Speech and Academic Freedom

Ownership Details and Review Schedule of Policy

Institution name	SIRM College
Effective from	13 February 2026
Review cycle	1 Year
Next Review Due Date	13 February 2027
Policy owners	Board of Governors
Approving Body	Board of Governors
Lead Contact	Principal c.fletcher-morgan@sirm.ac.uk
Applicable to	Governors, staff, registered students, applicants, contractors, visitors, external speakers and any other individuals or organisations participating in SIRM College activities, events or premises, including online activity hosted or facilitated by SIRM College.
Relevant/Applicable OfS Conditions of Registration/requirements	Condition F1: Transparency information Condition E2: Management and governance Condition E6: Harassment and sexual misconduct, where relevant to the interaction between freedom of speech, lawful speech, harassment and misconduct OfS freedom of speech duties and related regulatory guidance, including Regulatory Advice 24
Other relevant / applicable legislation/requirements	Higher Education (Freedom of Speech) Act 2023 Education (No. 2) Act 1986 Human Rights Act 1998, including Article 10 Equality Act 2010 Data Protection Act 2018 and UK GDPR Public Order Act 1986 Counter-Terrorism and Security Act 2015, including the Prevent duty, where relevant to events, speakers and campus activity

DOCUMENT CONTROL

Date	Review & Revision	Owner	Version
13.2.26	New Policy	Principal	1

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Freedom of Speech and Academic Freedom

1. Policy Statement

SIRM affirms its statutory duty under the Higher Education (Freedom of Speech) Act 2023, the Education (No. 2) Act 1986, and Article 10 of the Human Rights Act 1998 to take all reasonably practicable steps to secure freedom of speech and academic freedom within the law. Restrictions on speech will only be applied where they are lawful, proportionate, and necessary. This Policy is supported by the SIRM Freedom of Speech & Academic Freedom Code of Practice, which provides practical guidance for students, staff, and visitors.

2. Purpose and Scope

- This Policy applies to:
- Board of Governors
- All staff (academic and professional)
- All students and student societies
- Contractors, visitors, and external speakers
- Activities on SIRM premises, online platforms, and Students' Union spaces

3. Key Principles

The following principles set out the foundation of SIRM's commitment to upholding freedom of speech and academic freedom, and guide how these rights and responsibilities are applied in practice:

- Lawful expression is protected even if offensive or unpopular.
- Unlawful speech is prohibited, including incitement to violence, terrorism, or harassment.
- Academic staff enjoy academic freedom in teaching, research, and publication.
- Recruitment, promotion, and disciplinary processes will not require conformity to political or ideological views.
- Non-Disclosure Agreements (NDAs) must not be ued to prevent disclosure of issues relating to free speech, harassment, or misconduct.
- SIRM remains institutionally neutral on political or controversial issues.

4. Compliance Framework

When assessing speech, events, or protests, SIRM applies the 3-step test:

1. Is the speech lawful? If unlawful, it will be restricted.
2. Can it be reasonably secured? Measures may include risk assessments, security, or venue adjustments.
3. Would restrictions impair academic functions? Restrictions must not undermine teaching, research, or inquiry.

5. Events and External Speakers

SIRM recognises that external speakers and events form an important part of academic life, enriching debate and exposing staff and students to a diversity of perspectives. Both staff and students can propose events/speakers. To ensure these activities can take place safely and lawfully, clear procedures using a risk-based approach are in place for the approval and management of events:

Organisers must submit external speaker requests following the process below, at least 20 working days in advance.

Requests are assessed against the 3-step test above, which is managed via the 3-step process below:

5.1 Step 1 – Initial Assessment

The event organiser completes a Proposed Event Request Form, providing details about the event, proposed speaker(s), topic, audience, and any potential risks (e.g., controversial subject matter, public access). This self-assessment identifies if there are any immediate low/medium/high risks associated with the event or speaker.

5.2 Step 2 – Risk Review and Mitigation

If any risks are identified in the initial assessment, the Proposal undergoes a Risk Assessment by at least 2 members of staff, one of whom should be a designated departmental or institutional officer.

This stage assesses the identified risks, applies control measures (such as imposing conditions like security, moderation, or restricting audience), and determines if risks can be mitigated to an acceptable level.

5.3 Step 3 – Decision and Escalation

If residual risks remain high after mitigation, the Proposal is escalated for senior institutional review to the Principal or their nominee.

The final decision is made on whether the event can proceed, proceed with further conditions, or must be refused (with reasons provided to the organiser)—always ensuring proportionality and safeguarding free speech within the law.

All outcomes and conditions are clearly communicated to the organiser and relevant stakeholders.

Events are not refused solely because a view is controversial. Grounds for refusal include:

- Incitement to crime, terrorism, or hatred
- Breach of Equality Act 2010 or
- Prevent Duty
- Safety or public order risks that cannot be mitigated

Organisers may be asked to contribute to reasonable costs (e.g. security).

All decisions will be documented with reasons for OfS audit and accountability.

Events must be proposed using the Proposed Event Request Form, to ensure the requisite considerations are undertaken. Events requested not via this process will not be considered.

On receipt of a Proposed Event Request Form, a Risk Assessment will be completed

6. Protests and Demonstrations

SIRM acknowledges that protest is a legitimate form of free expression and an important part of democratic and academic life. Our approach seeks to balance the right to protest with the need to protect safety, maintain access to facilities, and ensure the continuation of teaching and learning.

- Peaceful protest is recognised as a protected form of free expression.
- Blanket bans will not be imposed.
- Reasonable conditions (time, location, stewarding) may be applied to protect safety, access, and teaching.
- Decisions and restrictions will be recorded.

7. Partnership and Contracts

SIRM will review external partnerships, funding agreements, and contracts to ensure they do not restrict lawful speech or academic freedom. Agreements that enable censorship will be amended or terminated.

8. Responsibilities

Safeguarding freedom of speech and academic freedom is a shared responsibility across our community. The following outlines the specific duties of students, staff, external speakers, senior leaders, and the Principal in upholding this Policy.

Students and Staff: All members of the SIRM community are expected to respect the rights of others to express lawful views, even where those views may be strongly contested or unpopular.

Event Organisers: Anyone arranging an event must follow the procedures outlined in this Policy together with any instructions arising from the assessment of the Event Proposal, and are responsible for ensuring that invited speakers are fully briefed on their responsibilities.

External Speakers: Individuals invited to speak at SIRM are required to act within the law and to respect the rights and dignity of others while contributing to debate and discussion.

Senior Leadership Team: The SLT is responsible for applying the three-step compliance test when making decisions, ensuring institutional neutrality, and maintaining accurate records of decisions taken.

Principal: The Principal is the accountable officer for compliance with OfS requirements and has ultimate responsibility for oversight, reporting, and the annual review of this Policy.

9. Complaints and escalation

SIRM is committed to providing clear and fair routes for raising concerns where individuals believe their right to freedom of speech or academic freedom has been restricted.

Staff, students, visitors and external speakers may raise complaints if they believe their rights have been infringed.

Complaints will be managed under SIRM's Freedom of Speech Complaints Procedure.

Where a complainant remains dissatisfied after exhausting SIRM's internal procedure, they may have access to an external review route, depending on their status and the nature of the complaint. Students may be able to refer

eligible unresolved complaints to the Office of the Independent Adjudicator. Staff and visiting speakers may be able to refer eligible matters to the OfS Free Speech Complaints Scheme once that scheme is in force and subject to the scheme rules applicable at the time.

10. Transparency and Reporting

To demonstrate accountability and compliance with its legal duties, SIRM is committed to transparent reporting and the systematic recording of decisions relating to freedom of speech and academic freedom:

All decisions on speakers, events, or protests must be documented with reasons.

An annual Freedom of Speech and Academic Freedom Report will be presented to the Board of Governors, following review by the Compliance and Quality Committee, and will be published where required.

11. Sanctions

Where this Policy is breached, SIRM will take proportionate action to uphold its duties and protect the rights of others. Any action or sanction will be considered according to the role and circumstances of those involved and, where applicable, under the relevant SIRM policy or procedure.

- Staff or students who breach this Policy may be subject to action under the relevant disciplinary or conduct procedure.
- Governors may be subject to action under the Instrument and Articles of Government and any applicable governance procedures.
- Visitors or external speakers may be excluded from future activity where this is lawful, proportionate and necessary.

12. Review

This Policy will be reviewed annually for the first review cycle and then every two years, unless an earlier review is required due to legislative change, regulatory guidance, institutional learning, complaints, incidents or governance review.