

External Guest Booking Procedure



Approved by:	BIMM University Limited Board
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Changes:	See Appendix 1

1. SCOPE

- 1.1. This Procedure sets out BIMM University's requirements for the management of events that include external speakers and should be used by all students and staff (including as a sponsor for a student event) when booking an event that includes an External Guest as a speaker.
- 1.2. The underlying legal requirements and principles that relate to this Procedure are set out in BIMM University's [Freedom of Speech Policy](#) and its [Prevent Duty Policy](#), as amended from time to time (collectively known as the "Policies"). This Procedure should be read in conjunction with those Policies.
- 1.3. In line with BIMM University's statutory duties, the presumption of this Procedure is in favour of free speech within the law. 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 under this Procedure. BIMM University shall not unreasonably refuse consent for an Event to take place unless any event involves or is reasonably expected to involve the expression of views that contravene the law or pose an unacceptable risk to the health and safety or welfare of staff, students or visitors to BIMM University which cannot be mitigated by putting in place precautionary measures.

2. DEFINITIONS

- 2.1. External Guests are defined as anyone external to any of BIMM University's Schools who is not a registered student of BIMM University, or a staff member normally employed by BIMM University, and who is invited by BIMM University to deliver either: in-class content or to attend and speak at or perform at Masterclasses or other events. Freelance staff who deliver classes are not classed as External Guests for the purposes of this Procedure.
 - Event Moderator: An Event Moderator is a staff member of BIMM University who is appointed to moderate / supervise an Event involving an External Guest as speaker.
 - Principal Organiser: The Principal Organiser is the key contact / organiser of the event. This could be any member of university staff.
 - A "Guest Lecturer" is an in-class guest, who may also be a visiting / Emeritus Professor – Guests Lecturers are normally organised by the Head(s) of School at each campus.
 - BIMM University's Prevent Lead and Freedom of Speech Lead - currently the Deputy Vice-Chancellor & Chief Operating Officer (DVC & COO) - has overall responsibility for matters relating to Freedom and Speech and the Prevent Duty. The Freedom of Speech Lead has delegated responsibility for operational aspects of this procedure to the Associate Director of Academic Services: Quality Assurance and Regulatory Compliance (ADAS: QARC).
- 2.2. This Procedure covers all meetings and events hosted, organised or managed by BIMM University or individual groups and societies using BIMM University's name or resources (including masterclasses, lectures, seminars, committee meetings, conferences and other symposiums, whether held physically on or off University premises or remotely, including live streamed or recorded content, and any other activities proposed, planned or due to take place at BIMM University or using University facilities (including physical premises and IT systems), whether including an External Guest or not ("Event").
- 2.3. This Procedure does not apply to events where BIMM University's has provided sponsorship or branding only and is not actively involved in the organisation or management of the event. However, appropriate due diligence should still be considered undertaken to ensure

that event organisers are aware of relevant legal obligations, including those relating to duties and reduce risk of breach of Freedom of Speech and the Prevent Duty obligations.

- 2.4. Freedom of Speech Policy means BIMM University's [Freedom of Speech Policy](#), as amended from time to time.
- 2.5. Prevent Duty Policy means BIMM University's [Prevent Duty Policy](#), as amended from time to time.
- 2.6. The approval period of any individual as an External Guest via this Procedure will be for each specific event or series of events only. Should an External Guest return for an additional Event at a later date, the Principal Organiser will be required to submit a fresh booking, and the External Guest will again be required to be processed via this Procedure.

3. PROCEDURE

- 3.1. Advance booking of at least ten working days is normally required for any Events, and the organisers of any Event are required to appoint a member of staff to act as Principal Organiser of the Event. This Principal Organiser shall be responsible, as far as is reasonably practicable, for ensuring that the organisation of the Event and the conduct of those attending it, whether from the BIMM University community or outside, is lawful and compliant with the [Prevent Duty Policy](#) and [Freedom of Speech Policy](#), and to all relevant guidance and to any condition relating to the Event imposed under this Procedure and that, where appropriate, the Event Moderator is properly briefed.
- 3.2. A student may organise an event (for example, on behalf of a society within the BIMM Students' Association), but only under the authority and guidance of a Principal Organiser, as defined in 2.1.
- 3.3. The Principal Organiser is responsible for seeking information about proposed Event (including the nature of the Event, expected attendance) and any External Guests (including their online presence / social media activity / media coverage) and undertaking a risk assessment. They should then complete the [Events & Guests Booking Form](#). Where any concerns are flagged relating to the following, the appropriate person will be notified, and risk assessment shared:
 - Concerns relating to **Prevent Duty** will be flagged to the Campus Prevent Lead in the first instance who should inform the ADAS: QARC where any concerns are likely to lead to a referral.
 - Concerns relating to **Safeguarding** will be flagged to the Designated Safeguarding Lead (Student Wellbeing Manager).
 - Concerns relating to **Freedom of Speech** will be flagged to the Academic Services (normally ADAS: QARC or the Director of Academic Services) in the first instance, who may liaise with the Freedom of Speech Lead.
 - "Other" concerns will be triaged by the Events and Community Manager in the first instance and will decide in liaison with the Campus Dean which action to take. Any decisions must be recorded.
 - Any event with "no concerns" selected is deemed low risk, in which case the speaker is agreed by the relevant Events and Community Manager.
 - The QARC team has oversight of all forms submitted.
- 3.4. The Principal Organiser should append any evidence of Due Diligence and risk assessments undertaken to the [Events & Guests Booking Form](#). Provided the relevant contact named in 3.3 above agrees an Event is low risk, the event will proceed. If the

Event is deemed medium or high risk or if the Events and Community Manager disagrees with a low-risk rating, the proposed Event shall be referred to the Freedom of Speech Lead who will make the final decision.

- 3.5. Where any risk is identified under the Prevent Duty, or it is reasonably believed that the Event may breach the bounds of lawful free speech or that there might be security or safety risks, this should be referred to the relevant Campus Dean in the first instance. For the avoidance of doubt, security and safety risks are defined as risks to the life or physical health of any person, or damage to premises, or of theft or damage to property, or of disruption of an Event to the point at which good order is threatened (examples of good order are set out below). The Campus Dean may also decide at this stage not to authorise any Event involving the External Guest or Guest in question. Where an event may not go ahead due to Freedom of Speech concerns, this decision must be referred to the Freedom of Speech Lead. All decisions not to move ahead with an event must be recorded.
- 3.6. Where an event may not go ahead due to Freedom of Speech concerns, this decision must be referred to the Freedom of Speech Lead. All decisions not to move ahead with an event must be recorded.
- 3.7. Where an event may not go ahead due to Prevent Duty concerns, this decision must be referred to the Prevent Lead Freedom of Speech Lead. All decisions not to move ahead with an event must be recorded.
- 3.8. The Principal Organiser is also responsible for undertaking checks as appropriate for key issues relating to equality and diversity, or of a political nature. Where any issues are identified which might be considered a risk, these should be referred by the Principal Organiser to the relevant Campus Dean, who will liaise with the Freedom of Speech Lead to make any final decisions on such External Guests. Appropriate security arrangements would need to be put in place to hold any event which was deemed higher risk, to be arranged locally on a case-by-case basis,
- 3.9. If necessary, campus Events teams should refer in the first instance to BIMM University's [Freedom of Speech Policy](#) for guidance on matters relating to free speech. They should seek further advice, if necessary, from the ADAS: QARC or DVC & COO, especially in cases where issues of principle in respect of free speech arise, or if it is proposed that access to an Event be significantly modified or curtailed, or that it be postponed or cancelled. Any stipulation requiring one or more speakers not to participate in an Event which otherwise goes ahead requires the explicit approval of the Freedom of Speech Lead.
- 3.10. The External Guest details must be captured on the [Events & Guests Booking Form](#), and it is the responsibility of the Principal Organiser to ensure that a background check on the individual has been undertaken and risk assessed in line with the paragraphs 3.3 and 3.4.
- 3.11. Where there are concerns about an Event (for example where there are concerns that an event may attract a protest), BIMM University must consider how risks can be managed or mitigated.
- 3.12. BIMM University reserves the right to impose conditions on the use of the premises as are reasonably necessary for the discharge of its obligations relating to the safety, health and welfare of its students, staff 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 BIMM University, the provision of appropriate security, having in place an independent Chair, or limits on the number of attendees.

- 3.13. Any costs incurred by BIMM University in complying with these conditions may be passed onto the Principal Organiser. The Principal Organiser would be consulted on any conditions or modifications in advance of the Event taking place and they would then be responsible for informing the External Guest of the outcome. BIMM University shall only pass on the costs of security for using the premises to those arranging the relevant Event in exceptional circumstances.
- 3.14. An Event will only be cancelled in exceptional circumstances. For example, this may occur upon Police advice or if BIMM University determines that imposing conditions or measures would be insufficient to secure freedom of speech within the law and to prevent serious disorder within its premises. In such cases, BIMM University may decide not to allow the event to proceed. Any recommendation to cancel the arrangements for a proposed External Guest or Event will be approved by the Freedom of Speech Lead.

4. FREEDOM OF SPEECH PRINCIPLES

- 4.1. Everyone who organises, speaks at, or attends an Event at BIMM University 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;
 - preventing speakers from being heard clearly;
 - chanting or using foul or abusive language, including racial abuse;
 - refusing reasonable requests from an Event Moderator or other BIMM University staff involved in managing an Event;
 - acting in any other way which is threatening abusive or harassing, or which denies to others their right to legal free speech.
- 4.2. Nobody who has exercised their right to legal free speech should suffer censure as a result.
- 4.3. It is the responsibility of the Event Moderator to ensure that anyone who wishes to challenge or criticise the views of the speaker(s) in an orderly fashion is allowed to do so.
- 4.4. The primary duty of the Event Moderator is to uphold freedom of speech within the law. This means that the Event Moderator must adhere at all times to the [Freedom of Speech Policy](#), maintain good order at events, and must act impartially in their facilitation of discussion and debate. Event Moderators may pose questions to the speaker(s) but should not be a speaker at the event themselves or be expressing their own views on the subject matter of the Event. Event Moderators must be willing to undertake any relevant training and preparation, including familiarisation with relevant policies, in preparation for the Event.

5. WITHHOLDING OR WITHDRAWAL OF PERMISSION TO HOLD AN EVENT

- 5.1. The primary purpose of this Procedure is to ensure that BIMM University is able to fulfil its legal obligations to promote freedom of speech and academic freedom within the law, whilst at the same time fulfilling its other legal obligations and statutory duties, and to ensure the smooth running of BIMM University.
- 5.2. This Procedure creates a presumption in favour of freedom of speech and the withholding, amending or withdrawing of permission for an Event will only occur in exceptional circumstances where measures cannot be put in place to secure freedom of speech within the law and wherever possible after consultation with the Principal Organiser and appropriate internal and external parties, as are deemed appropriate

6. APPEALING AGAINST THE DECISION

- 6.1. Appeals against the decisions of the Freedom of Speech Lead may be made, within 15 working days in writing to the Chief Executive Officer & Vice-Chancellor, or their nominee, whose decision shall be final but must be reported to the next meeting of BIMM University Limited Board.

7. SANCTIONS / COMPLAINTS

- 7.1. If there is any contravention of this Procedure, then the individual or individuals (whether staff or student) responsible will be liable to be referred into BIMM University's respective disciplinary procedures and subject to sanction if determined appropriate.
- 7.2. Formal complaints in relation to the BIMM University community's rights to free speech and academic freedom can be made using the [Freedom of Speech Complaints Scheme](#).
- 7.3. Other complaints can be raised by referring to the [Student Complaints Procedure](#) or the [Staff Grievance Procedure](#) in the first instance.

8. REVIEW & MONITORING

- 8.1. BIMM University has a duty to monitor and keep this Procedure up to date and it will, therefore, report to BIMM University Limited Board on its operation, together with any recommendations for its terms, annually. This report shall be consulted on at Academic Board prior to consideration by the BIMM University Limited Board.
- 8.2. An annual report on any issues of non-compliance with this Procedure shall be made to the BIMM University Limited Board.

Appendix 1 – Changes since version 1.0

The External Guest Booking Procedure has been significantly updated to reflect new statutory duties under the Higher Education (Freedom of Speech) Act 2023, with emphasis on the legal requirement to secure freedom of speech and academic freedom “within the law.” Other differences / additions are as follows:

- Clearer distinction between Guest Lecturers and External Guests.
- Events now include screenings, performances, and remote content, broadening the scope.
- New clause added under “Events” outlining the responsibilities of Event Organisers regarding free speech, including:
 - Not denying access based on lawful views.
 - Indemnifying the University if they breach legal obligations.
- Principal Organiser role clarified as responsible for due diligence, risk assessment, and background checks.
- Event Moderator role reinforced as impartial facilitator, not a participant.
- Freedom of Speech and Prevent Duty Leads clearly identified as Deputy Vice-Chancellor and Chief Operating Officer, with operational responsibility delegated to the Associate Director of Academic Services: Quality Assurance and Regulatory Compliance.
- New process for flagging concerns via the [Events and Guests Booking Form](#) (Prevent, Safeguarding, Freedom of Speech).
- Clarity that Events and Community Managers now have local oversight of low-risk events.
- Escalation to Freedom of Speech Lead for medium/high-risk or contested assessments (triaged by Campus Deans).
- New clause on managing protest risks introduced.
- Clause removed from “Good Order” section where it previously stated: “no flags, banners, placards” (it is suggested these be managed on a case-by-case basis using the OfS Framework for Assessment).
- Renewed focus on Moderator role.
- Events may be cancelled only in exceptional circumstances, e.g., police advice or serious disorder, or where speech is considered unlawful.
- New appeals process to the CEO & Vice-Chancellor.
- Freedom of Speech Complaints Scheme introduced.
- Clarification that disciplinary action may follow breaches of the procedure.
- Annual reporting to BIMM University Limited Board and Academic Board on compliance and operation of the procedure.