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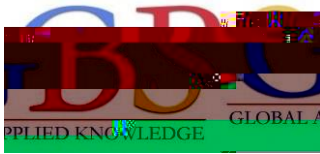
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**891 Greenford Road, London**  
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## **GBS Freedom of Speech Code of Practice**

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## Contents

1. Policy Statement .....	4
2. Purpose .....	4
3. Roles and Responsibilities .....	4
4. Scope .....	5
5. Legislation .....	5
6. Code of Practice.....	7
7. Internal Meetings and Activities .....	8
8. External Meetings and Activities .....	9
9. Management of Events and Speakers .....	9
10. Obtaining Permission to hold Events .....	11
11. Breaches of the Code of Practice .....	11
12. Monitoring and Review.....	12
13. Data Protection and Confidentiality .....	12
14. Alternative Format .....	12
Appendix A: Activities covered by the Code of Practice .....	13
Appendix B: Guidance on activities .....	14





with the principles of freedom of speech, the details of the Code and procedures for approving relevant activities

#### **4. Scope**

4.1 GBS Freedom of Speech Code of Practice sets out the rights and obligations inherent in supporting the principle of freedom of speech and expression within the law. The Code's obligations and rights apply to:

- GBS (which includes all bodies or persons having authority to determine any matter relevant to this Code).
- All students of GBS
- Any visiting or guest lecturers invited by GBS
- Any alumnus invited by GBS
- Any person or organisation wishing to hire premises controlled by GBS for an event.

4.2 In relation to the holding of any events on premises controlled by GBS, the Code of Practice rights shall also apply to:

- Persons invited or otherwise lawfully on the premises for the purposes of the event.
- Persons who, if it were not for the provisions of this Code, would have been invited to the event.

4.3 Those who are under a duty to observe and uphold the principle of freedom of speech within GBS shall do so at all times, irrespective of whether or not they are on property owned or controlled by GBS.

#### **5. Legislation**

##### **5.1 Article 10 of the Human Rights Act 1998**

5.1.1 Article 10 of the Human Rights Act<sup>1</sup> states that everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are proscribed by law and are necessary in a democratic society, in the

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*Human Rights Act 1998* <http://www.legislation.gov.uk/ukpga/1998/42/schedule/1/part/I/chapter/9>





### 5.3 Prevent Duty<sup>3</sup>

- 5.3.1 The Counter Terrorism and Security Act 2015<sup>4</sup> means GBS must have due regard to the need to prevent people from being drawn into terrorism (Section 26). GBS must also have particular regard to the duty to ensure freedom of speech and to the importance of academic freedom (Section 31). Under Section 29, GBS must have regard to any such guidance in carrying out that duty.
- 5.3.2 GBS complies with this duty in all its aspects, which in practice means striking a fine balance between concerns around extremism and concerns around censorship. The work in promoting British values and GBS values aim to positively address this challenge. It covers many areas of activity, including pastoral support for students, staff training, information sharing and assessing speaker events. In assessing speakers for events associated with GBS, account will be taken of the Government's list of terrorist groups or organisations banned under UK law and details of proscription criteria.

## 6. Code of Practice

- 6.1 GBS is an academic community of staff and students. Central to this concept is the ability of all its members freely to challenge prevailing orthodoxies, query the positions and views of others and to put forward ideas that may sometimes be radical in their formulation.
- 6.2 Any individual or body of persons shall be free, within the law, to hold meetings or engage in such other activities of the type set out in Appendix A on the premises of GBS, regardless of the beliefs, views, policies or objectives of that individual or body. Appendix B provides further guidance on types of activities.
- 6.3 GBS will seek to ensure that the use of our premises is not denied on grounds connected with the beliefs, views, policies or objectives of an individual body or body of individuals, as long as such use is at all times within the law. Where there are concerns about an event, GBS will seek to facilitate an open and transparent dialogue with the event organisers to establish whether the event can take place whilst ensuring GBS meets its legal obligations. Event organisers will be expected to take part in this dialogue in an open and transparent manner.

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*The statutory Prevent Duty Guidance has been issued to all 'specified authorities', with additional guidance for institutions of higher education <https://www.gov.uk/government/publications/prevent-duty-guidance> Counter Terrorism and Security Act 2015 <http://www.legislation.gov.uk/ukpga/2015/6/section/26>*



6.4 GBS branded events which take place outside of the premises will reflect the values of GBS, as stated in its Strategic Plan 2021-2023 and will comply with the spirit of the general principles and Code of Practice.

6.5 GBS has a zero-tolerance approach to discrimination, bullying, harassment or extremism or acts, which could incite or promote terrorist activity. It has a duty to maintain safety and good order on its premises and is also under a duty to prevent individuals being drawn into terrorism under the Counter Terrorism and Security Act.

6.6 All persons to whom this Code of Practice applies are required to observe the principle of freedom of speech whilst on GBS premises and shall show respect and tolerance towards the expression of views, opinions,







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- Will the proposed speaker or the theme or content of the event be likely to attract attendance from individuals or groups that have previously been known to express views or to act in ways that contravene the purposes of this Policy?
- Is there or might there be an intention to segregate the audience on the basis of any protected characteristic?
- Has the event been organised to raise or gather funds for any individual, organisation or cause that encourages, promotes, or undertakes acts that break the law?

9.3.2 If the answer is no to all of the above questions and it is clear that there are no issues that require further consideration then the organisation of the event can be approved



11.1 Any breach of the provisions of this Code of Practice shall be punishable under the appropriate Disciplinary Procedures of GBS, where applicable. It shall be the duty of all those subject to this Code of Practice to assist GBS in upholding the rights of freedom of speech set out in this Code.

11.2 Where a breach of this Code of Practice occurs, it shall be a duty of all to whom this Code of Practice applies to take all reasonable steps to secure the identification of persons involved in that breach. Where breaches of the criminal law occur, GBS shall, where appropriate, assist the Police and the Crown Prosecution Service. In respect of any criminal charges, GBS, shall not, unless the Chief Executive Officer determines otherwise, proceed with any disciplinary proceedings in respect of the same matters, until the conclusion on any ongoing criminal proceedings.

11.3 The operation of the Code shall be monitored by GBS Executive Board and overseen by Academic Board.

## **12. Monitoring and Review**

12.1 This policy may be amended by GBS at any time and will be reviewed annually to ensure it is fit for purpose. Any issues related to the monitoring and review of this policy, please contact [asgo@globalbanking.ac.uk](mailto:asgo@globalbanking.ac.uk).

## **13. Data Protection and Confidentiality**

13.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the Information Commissioners website. GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

## **14. Alternative Format**

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## **Appendix A: Activities covered by the Code of Practice**

Activities covered by Global Banking School Freedom of Speech Code of Practice include:

- I. Meetings, lectures, talks, seminars, tutorials, classes, short courses, conferences, other teaching, or informative activities of a similar nature.
- II. Stage plays, cinematic or video film showings, music concerts, literary readings.
- III. Demonstrations, processions, pickets.



## Appendix B: