

## Procedures for events, protests and open space gatherings at King's

Policy Category:	Governance
Subject:	The conduct of events, protests and open space gatherings
Approving Authority:	Council and University Executive
Responsible Officer:	Assistant Principal, Academic Freedom and Free Expression
Responsible Office:	Vice-Chancellor's Office
Related Procedures:	N/A
Related College Policies:	Code of Practice for Freedom of Speech and Academic Freedom; Policy statement on Academic Freedom at King's
Effective Date:	1 August 2025
Supersedes:	External Speakers Policy and Procedures for bookings for events with external speakers; It's My Campus! Policy; Guidelines for the management of contentious events and protests
Next Review:	July 2026

---

### Preamble

This document sets out procedures to be followed, and relevant guidance for management staff and event organisers, in relation to the conduct of events, protests and open space gatherings at King's. It replaces the following policies and procedures which are rescinded effective from 14th July 2024:

- External Speakers Policy and Procedures for bookings for events with external speakers;
- It's My Campus! Policy;
- Guidelines for the management of contentious events and protests;

### 1. Purpose

- 1.1.** This set of procedures is an appendix to the University's Code of Practice for Freedom of Speech and Academic Freedom. The core purpose of these procedures is to fulfil our commitments to freedom of speech and academic freedom by enabling a wide variety of events and activities to take place safely and lawfully in line with the values and provisions of the Code of Practice.
- 1.2.** These procedures provide information on event booking processes and expectations in respect to conduct for events. In addition to events bookings, this set of procedures also provides guidance for management staff in relation to protests, rallies, demonstrations and open space gatherings taking place on, or in very close adjacency to, King's premises.

### 2. Definitions

- 2.1. Academic entity** – This refers to Faculties, Schools, Departments, Institutes, Centres and other academic units within the King's academic structure.
- 2.2. Duty Dean and Deputy Duty Dean** – University officers designated to be the final decision maker at high risk/high profile events, whether organised by a student group or society or organised by King's entities.
- 2.3. Event organiser** – The person or persons primarily responsible for organising the event and liaising with external speakers and the University. They must have due regard to these procedures. Where a booking is made on behalf of an event organiser by another member of

staff or of the organisation concerned, it should be made clear during the booking process who will be organising the event.

- 2.4. External visitor** – An individual attending or invited to attend an event who are not current members of either the staff or student body of King’s or not formal affiliates of King’s.
- 2.5. FEMG** – Free Expression Management Group – The sub-committee of the University Executive that oversees Academic Freedom and Free Expression
- 2.6. FESAG** – Freedom of Expression for Students Advisory Group. FESAG is a sub-committee of FEMG, focusing on free expression for students. It is jointly chaired and populated by KCL and KCLSU.
- 2.7. FE Operations** – Freedom of Expression Operations Group is a second sub-committee of FEMG and conducts risk assessments and develops risk mitigations where required for student events, and provides advice for staff-organised events on request.
- 2.8. FECAG** – Free Expression Complaints Advisory Group – the 3<sup>rd</sup> and final sub-committee of FEMG triages complaints relating to free expression and advises whether formal investigations are required or not.
- 2.9. Professional Services Entity** – This refers to committees, teams, departments, directorates and other structures within the professional services community of staff at King’s.
- 2.10. Student** – A student enrolled at King’s College London.
- 2.11. Staff member** – A person employed by King’s College London.
- 2.12. Visiting speaker** – Speakers invited to attend an event who are not current members of either the staff or student body of King’s or not formal affiliates of King’s. This includes events where visiting speakers are streamed live or shown by pre-recorded video.

### **3. Scope**

The scope of these Procedures applies to the following classes of activity:

- 3.1.** Events and other activities (including but not limited to presentations, screenings, panel debates etc) organised by KCLSU, KCLSU ratified groups and student societies, unrated student groups and societies, or students acting in a personal capacity that:
  - a) take place in bookable rooms or indoor/outdoor venue spaces on King’s premises (i.e., our campuses and any other property owned or leased by the University);OR
  - b) are organised to take place online or at a venue off-site of King’s premises but are organised and promoted, whether full or part, with participation by people in the University community in mind.
- 3.2** Protests, demonstrations, rallies and other open space gatherings organised by members of the King’s student and/or staff community on, or in very close adjacency to, King’s premises (noting that approval for such gatherings is often not requested in advance, but these are still subject to the rules and expectations of conduct detailed below).

The following may be in scope, but are subject to local risk assessment first:

- 3.3** Events (including but not limited to lectures, seminars, workshops, panels, conferences and symposiums, including events that are part of the curriculum) organised by academic units or PGR students on King's premises or organised online or off-campus. In the first instance risk assessment and approval of such bookings will sit locally with the relevant Head of the Faculty, School, or Department, so as not to infringe academic freedom or add unnecessary burden. Staff or PGRs may always seek support from the University Free expression procedures in this document, but this is triggered on request by the staff member.
- 3.4** Commercial bookings on King's premises by third parties, where there is deemed to be a risk to free expression, as determined by King's Venues / FESAG Operations.

The following are out of scope for these procedures:

- 3.5** Staff member events undertaken in a personal capacity and not directly related to job responsibilities, where acceptance of a booking is discretionary, and the holding of such an event in university space must not conflict with University business or be for the purposes of commercial gain by the individual(s) involved. The responsibility for risk assessing such events lies with the staff member, personal events that are medium or high risk should not proceed on University premises as these incur cost and risk and are not associated with University business.

#### **4. Guiding approach**

- 4.1.** King's aims to facilitate a wide variety of events to take place safely and lawfully. King's will provide facilities for lawful views to be expressed by students, staff, and invited guests, and for lawful activities to take place on its premises. In offering a platform for the exchange of views, King's is not endorsing any argument or position being taken, rather it is staying true to its mission. In the words of the Kalven Report (University of Chicago, 1967) "The university is the home and sponsor of critics; it is not itself the critic."
- 4.2.** The primary purposes of bookable rooms and venues on King's premises are for teaching and university business. However, once these needs are met, the university will make available as many rooms and venue spaces as possible for community usage, notwithstanding advance bookings for other internal or external events.
- 4.3.** King's respects and upholds the rights of lawful protest and freedom of assembly. That said, we recognise the impact protests, rallies, demonstrations and open space gatherings can have on others in our community. We seek to take a fair and balanced approach and our guidelines for managing such activity are set out further below in these Procedures.
- 4.4.** King's will not charge ratified or unratified student societies or individual students or staff members acting in a personal capacity to fund security costs for an event approved through the booking process, unless additional security costs prove prohibitive. In this instance King's will engage with event organisers to agree a different range of risk mitigations with the goal of enabling the event to proceed at a reasonable level of cost. In the case of King's entities (e.g., a department or faculty) any additional security costs will be funded after discussions to establish a reasonable approach to cost sharing and risk mitigation between King's Security and the academic or professional services entity.

**4.5.** King's Venues has the right to charge additional security costs, based on its risk assessment processes, for third party commercial bookings where an event is judged to have a higher degree of risk associated with it. Key criteria in the risk assessment process will include, but is not limited to, the intended content of the event, the profile of the speakers(s) particularly where they may be high profile, any information on past incidents or disruption of events involving the speaker(s) or organisation, and consideration of the wider threat environment. Any intended additional security cost charges will be set out in detail to the organisation with the event booking ahead of the event taking place.

## **5. Responsibilities and expectations on conduct**

### **5.1. Responsibilities of the University**

**5.1.1** King's will permit events, protests and other activities that students and/or staff participate in to take place except where they:

- Are assessed to have a high risk of being unlawful or present a serious risk of causing a breach of the peace or inciting hatred;
- Risk putting the health and safety of students, staff and/or visitors at risk;
- Infringe on the rights of other members of our community at King's to lawfully express their views (e.g., protests disrupting or drowning out an event from taking place, or groups in open spaces assessed to intentionally be creating an intimidating environment);
- Are unduly constraining or significantly impacting the normal operations and life of the university, including the right of our community to study and work.

**5.1.2** King's will seek to work collaboratively and in non-confrontational ways with event and protest organisers to ensure such activity is managed in a fair and safe way. Further guidance on the University's approach is provided in Section 8 below.

**5.1.3** Where all reasonably practicable steps have been exhausted, King's reserves the right to cancel an event either in advance or while in progress, but this is a measure of last resort. This includes a situation where King's Venues did not receive the necessary engagement and assurances from an event organiser required to ensure the event can take place securely and safely (as in without risk to physical health and safety).

### **5.2. Required conduct of an event organiser**

**5.2.1** Any event with an invited audience, whether held on King's premises or offsite or online under King's/KCLSU related entity auspices, must have a designated event organiser who is responsible for the arrangements and the conduct of the meeting. An event organiser is expected to behave reasonably and cooperate with King's staff to ensure that preparations for and conduct of a speaker event or screening/presentation comply with any specific conditions, established University procedures, and the laws of the United Kingdom. They are required to complete the risk assessment process as completely as they can and should be confident they have done so before submitting. Where they are unsure about any element of the risk assessment process, they should seek clarity from King's Venues or within their relevant academic structure.

- 5.2.2 It is the responsibility of an internal event organiser to be aware of the Fire Safety Awareness material provided on the University intranet and ensure they or the Chair makes attendees aware of fire exits. In the event of a fire alarm or fire, they are responsible to instruct those in attendance to leave via fire exits.
- 5.2.3 An event organiser and others involved in delivering an event are required to remove litter and belongings after an event has finished and, where needed, returning the room to a tidy state if they have moved furniture around.
- 5.2.4 The option of disciplinary action exists where event organisers fail to behave appropriately. More detailed expectations and guidance on responsibilities are provided in Section 7 below.

### 5.3 Required conduct of an internal or visiting speaker

A speaker, whether internal or external to the King's Community, is required to abide by UK law, the relevant provisions on required conduct set out in our [Code of Practice](#) and these Procedures. An internal or visiting speaker must not undermine the lawful freedom of expression of others and is expected to comply with any conditions or mitigations applied as reasonably practicable steps for an event.

### 5.4 Required conduct of event audiences or participants at any protest or demonstration on King's premises

- 5.4.1 Event audiences and participants are required to tolerate the right of others to exercise their freedom of expression and not to take actions that intimidate others or undermine open debate. They are required to comply with lawful and reasonable requests from members of King's staff involved in ensuring the safety, security and legality of an event, protest, demonstration or related activity. Further details on expectations and responsibilities of protest organisers and protestors are outlined in Section 10.
- 5.4.2 Where an individual or group is assessed to be engaging in potentially unlawful activity, intentionally creating an intimidating environment, or causing disruption to an event or an important activity such as a teaching session or university work processes, King's has the right to remove that individual or group from our premises, and potentially take disciplinary action if they are a member of our student or staff community.

## 6. Event booking procedures

### General provisions:

- 6.1. All event bookings made through central procedures are covered by King's Venues [Terms and Conditions](#). Event organisers are expected to read and adhere to these.
- 6.2. Events that are to be held in space not within King's Venues' authority but held under the auspices of King's or KCLSU entities are still required by the University to adhere to the Code of Practice and these Procedures in respect to expectations on conduct.
- 6.3. In the case of event bookings made through King's Venues' booking system and/or KCLSU's booking process, if external speakers are involved, a minimum of 15 working days advance notice of the booking will be required. This is to allow time for risk assessments to be undertaken, and risk mitigations to be developed and agreed where required. Earlier notice is always helpful in the case of events that event organisers know or assume may be high risk.

- 6.4. Bookings involving external speakers that provide less than 15 working days advance notice will not be able to be accommodated.
- 6.5. King's reserves the right to cancel a room booking on its premises if there is exceptional need for teaching purposes or another important reason such as force majeure.

**For KCLSU ratified society/group bookings:**

- 6.6. For KCLSU society bookings, an event organiser for the ratified group should first complete the KCLSU online booking form at [Room Bookings \(kclsu.org\)](https://www.kclsu.org/RoomBookings).
- 6.7. When the KCLSU processes are complete, KCLSU will notify King's of the event request by sending a copy of the student booking request and the outcome of any speaker checks to King's Venues. KCLSU will include a clear description of the event and state their decision in the comments section.
- 6.8. Provided King's Venues agrees an event is low risk, the booking process will proceed. If the event is deemed medium or high risk by KCLSU, or if King's Venues disagrees with a low-risk rating, the Joint Risk Assessment process will be carried out.
- 6.9. Joint Risk Assessments will be conducted by King's Venues on behalf of the Senior Vice President (Operations) and in collaboration with KCLSU. They will seek advice from Security and from any other relevant entities, including Student Services, related academic departments and, if the event has a religious theme, The Dean's Office, in order to complete this or any subsequent assessment.
- 6.10. Events deemed to be medium risk will be referred to FESAG Operations Group for approval. Those deemed to be high risk will be referred directly to the FESAG Co-Chairs for approval and the decision will be shared with FESAG for information.

**For internal events organised by individual or unratified groups of students or staff members:**

- 6.11. Booking requests by individual students or unratified groups can be made through this [form](#). They will be subject to the same booking process risk assessment process by King's Venues as other types of event. Individual staff members should go through the King's Venues Helix form on the intranet.

**For Department/Faculty/Directorate events:**

- 6.12. Where an event is taking place as described in 3.3 above in locally controlled space, then in the first instance risk assessment and approval will sit with the relevant Heads / executive leads of the Faculty, School, Department or Directorate. Where they believe a proposed event may be high risk they should contact King's Venues and/or Kings Security for advice and support.
- 6.13. Those organising events for academic or professional services entities should follow the King's Venues' processes outlined above when booking rooms or venues via the King's Venues booking process, with the support of the relevant Department or Directorate Office, with the booking submitted by a designated member of staff. This staff member must be able to take responsibility for the booking and therefore have an understanding of the event and contact

with the main organisers and will usually be a member of the departmental administrative team. The event organiser should complete the form in this [link](#).

**6.14.** The booking request should be submitted to the relevant Department/Directorate authority for initial risk assessment and that assessment then submitted to King's Venues. If King's Venues agrees an event is low risk, the booking process will proceed. If the event is deemed medium or high risk by the Department/Directorate authority, or if senior management or King's Venues disagrees with a low-risk rating, a Joint Risk Assessment process will be carried out by the Department/Directorate and King's Venues, as above.

## **7. Event organisers – expectations and guidance**

**7.1.** Further to the general responsibilities set out in 5.2 'Required conduct of an event organiser', this section sets out in more detail expectations and useful guidance for event organisers to follow.

**7.2.** Event organisers must:

- Familiarise themselves with the University's Code of Practice and this set of Procedures;
- Be aware of the University's [Fire Safety training and guidance](#) and familiarise themselves with the fire exits to direct guests in the event of a fire alarm on our premises;
- Ensure that the appropriate amount of trained fire marshals are available for their event in accordance with the King's [Fire Evacuation Procedures](#);
- Comply with any directives given to them by a Duty Dean/Deputy Duty Dean during the course of an event, and accept that their decision is final;
- Behave with integrity in relation to the organisation of an event, providing all relevant information to help inform a risk assessment process and only submitting when they are confident they have considered risks comprehensively;
- Provide to the best of your ability any additional information requested by King's Venues or security to assist in the risk assessment and event delivery processes;
- Meet with the University officers if requested to discuss conditions or mitigations for an event to take place, and if they agree to them to enable an event to go ahead, they must abide with what they agreed;
- Retain records of the organisation of an event for at least 6 months after the event has taken place and provide such records to the University upon request;
- Ensure an event chair and the relevant speaker(s) are familiar with any specific conditions or mitigations put in place. Where a ratified student group or society event has been designated medium or high risk, ensure the Chair is appropriately trained through KCLSU processes and experienced;

## **8. Risk assessment, application of conditions/mitigations, and communication of decisions**

**8.1.** When King's receives event bookings through the King's Venues booking system, these are reviewed to see if they merit further examination on the grounds of risk. Events will be classified as low, medium or high risk and, if necessary, referred to the Free Expression Operations Group for further consideration.

- 8.2.** Following the risk assessment, King's will confirm whether the event can go ahead, cannot go ahead or can go ahead subject to applied conditions or risk mitigations. For medium and high-risk events these conditions/ mitigations include, but are not limited to, the following:
- I. The event be filmed by an independent body or recorded using the internal lecture capture system;
  - II. A 'Duty Dean' (a trained member of the University senior management) being present to support Campus Operations and Security in decision-making at the event; Additional King's staff may be present to observe the event in progress and provide advice;
  - III. A KCLSU Observer (senior staff member) being present at a ratified group or society event to ensure that Freedom of Expression is maintained.
  - IV. Additional security may be provided, including at the entrance to the venue/room.
  - V. An event promoting debate of an issue includes mitigations to ensure a balanced set of views are presented;
  - VI. An event that was for society members only be opened to all King's students or KCLSU members;
  - VII. A copy of any speech to be delivered by the speaker(s) is submitted in advance;
  - VIII. The speaker is required to meet with a member of King's senior management to discuss the event in advance as a pre-condition for approval;
  - IX. The event organiser and / or Chair of the event is to meet with the appointed Duty Dean, security staff or other staff as needed in advance of the event and fully engage in the planning process;
  - X. The event is approved to take place at a date different from that which was requested by the organiser;
  - XI. Consideration of the appropriateness, training, and competency of the chair of the event and whether an alternate or additional chair may be required who has experience or undertaken KCLSU Chairs training;
  - XII. Ticketing may be required and may be subject to conditions such as: limited to King's staff and/or students, or limited in number, one ticket per person; ID checks at the door to be conducted by King's staff, etc;
  - XIII. Location of the event may be changed at the discretion of King's;
  - XIV. Alternative ingress and egress routes may be required,
  - XV. Limitations on banners or flags.
- 8.3.** A decision will be communicated to the designated event organiser within ten days of the request being referred to King's. For KCLSU and ratified group or society events that proceed, the organisers will be reminded of the need to abide relevant KCLSU policies and procedures and to inform audiences at the beginning of the event of expected behaviours.
- 8.4.** In all cases where an event is not permitted to go ahead, or where mitigations are put in place as outlined above, a clear communication of the reasons for the decision will be sent to the event organiser, or KCLSU, that adheres to the values and provisions set out in our Code of Practice and these Procedures.
- 8.5.** If an event organiser is unhappy with the mitigations, they may have a further discussion with the co-chairs of FESAG, whose resulting decision will be final. Decisions to deny approval of an event may be appealed by the organiser using the appeals process set out below in these Procedures.

**8.6.** King's retains the right to approve or reject requests for events to be covered by external media organisations. King's student media groups do not need to request permission to cover an event. All external media requests should be directed to [comms@kcl.ac.uk](mailto:comms@kcl.ac.uk).

## **9. Segregation, including gender segregation, at events**

**9.1.** Compulsory or compelled segregation, including on the grounds of gender, at events under the jurisdiction of this policy is explicitly prohibited.

**9.2.** King's will not interfere with the freedom of attendees to sit in the location of their choosing at events, but organisers must not enforce any segregated seating. King's will follow guidance set out by the [Equality and Human Rights Commission](#).

## **10. Guidance in relation to events, protests and open space gatherings on or adjacent to King's premises**

### **Responsibilities and general operational approach of the University:**

**10.1.** King's respects and upholds the right to lawful protest and freedom of assembly. The University has a responsibility to adjudicate in such circumstances, and to balance the opportunity to protest and argue with the expectation of being able to work and study without undue disruption, intimidation or fear.

**10.2.** In keeping with King's Code of Practice and our policies and expectations around diversity, inclusion and dignity at work, the University commits to the following during any form of contentious event and associated protest, or a protest, demonstration, occupation or open space gathering:

- To work collaboratively and in non-confrontational ways with event and protest organisers to ensure events and protests are managed safely for everyone in the campus community.
- To challenge any behaviours that are not in keeping with University regulations and policies. To encourage staff to report to the University and/or authorities any action they credibly believe to be unlawful or dangerous to health and safety.
- To endeavour to ensure that the University can operate as normal with students and staff feeling safe to study and work on our campuses.
- To manage security at events and protests by providing a safe environment where people meet to speak and act freely, within the law. Where additional security is required, the costs will be underwritten by the University and not charged directly to the event or protest organiser.
- However, should security costs become prohibitive, the University reserves the right to engage with event or protest organisers to agree alternatives (e.g., holding an event online or limiting the number of protestors allowed in a designated area during a general or specific time period) and will document the decisions and rationale for security decisions.
- Use verbal and non-verbal conflict resolution techniques to ensure that physical intervention and reasonable force is only used as a last resort and in accordance with the law.
- Where police attendance is necessary, either due to increased risks of harm or where a crime has been committed or is alleged to have been committed, Campus Security will

communicate with the police and event/protest organisers to minimise the potential risks and impact.

- 10.3.** King's will not tolerate violent, intimidating, or otherwise aggressive or abusive behaviour by either members of our student and staff community or external visitors seeking to protest at King's. If any member of staff or student believes that an action or activity taking place is unlawful or dangerous to health and safety, they should contact Campus Operations or Security immediately.
- 10.4.** King's will take all reasonably practicable steps when needed to relocate or cease protests, demonstrations, rallies, or other open space gatherings if any of the following apply:
- They significantly disrupt or constrain the normal operations of the University;
  - They have impacted or are assessed to pose a credible risk to health and safety;
  - The effect of the protest, rally, demonstration or open space gathering is to prevent or significantly impede the right to lawful freedom of expression of others;
- 10.5.** When King's assesses a protest, demonstration, rally or open space gathering is likely to breach the expectations outlined in this policy, King's will raise this with the protest leader/organisers. If a suitable mitigation or accommodation cannot be reached, King's reserves the right to require the relocation or cease the protest or other outlined activity above.
- 10.6.** King's will take all reasonably practicable steps to ensure public order and to prevent crime on its premises; to ensure public safety; and to protect the rights and freedoms of staff, students, visitors, and guests. King's will consult with external agencies as necessary – including the police, public authorities, and government agencies, and will co-operate with such agencies as required by UK law.
- 10.7.** Where such behaviour is happening nearby to King's premises and negatively affecting normal operations and perceptions of safety, King's may take it into account in respect to any disciplinary action taken.
- 10.8.** King's is ultimately responsible and accountable for all events held on King's campuses, and therefore no event subject to this policy will be confirmed until King's have authorised the event, whether that authorisation is through King's Venues or a Department/Directorate authority.
- 10.9.** The Senior Vice President (Operations) is ultimately responsible for decisions regarding the approval of events subject to this policy but may delegate authority with respect to various aspects of event approval.
- 10.10.** For all events subject to this procedure, consideration will be given by the Senior Vice President (Operations) or designate as to:
- The potential for any decision to limit freedom of speech or academic freedom as per King's Code of Practice in relation to its statutory duties as set out in the Higher Education (Freedom of Speech) Act 2023.
  - King's duty to give due regard to various statutory provisions including those set out in the Equality Act 2010 and the Counter-Terrorism and Security Act 2015.

- The potential for the event going ahead to cause King's to fail in its wider legal duties (for example, legislation relevant to safety in the workplace).
- The potential for the speaker's presence on campus to give rise to breach of the peace.

### **Role and responsibilities of University Security and the Duty Dean and Deputy Duty Dean**

- 10.11.** The University's Head of Security is responsible for overall security of events held on King's campuses. The Head of Security will act as the main point of contact for the police if necessary.
- 10.12.** The management and planning of any individual event that may pose a security and/or safety risk to any person, building or facility at King's is the responsibility of the event organiser in consultation with the university's building and event managers and the Head of Security or designate.
- 10.13.** With high-risk events where a Duty Dean has been appointed, on the day of the event the Duty Dean will be the ultimate decision maker in the event of a potential or actual breach of this policy or concerns arising with respect to safety or freedom of expression.
- 10.14.** The Duty Dean has a duty to be present at the venue before the event begins to ensure they are satisfied with the arrangements but are not required to attend the event. They should remain in the vicinity of where the event is taking place in case their guidance is required. A Deputy Duty Dean may also be in attendance for support or training purposes. They can be designated by the Duty Dean to have the power to intervene or make a decision about the event as needed if the Duty Dean is unavailable or incapacitated.
- 10.15.** The Duty Dean at medium or high risk KCLSU ratified student society or group events has responsibility and authority to:
- endorse the decision making of E&F senior staff or refer elsewhere for decision/urgent action;
  - intervene to discourage inappropriate student behaviour and to ensure that all parties' Freedom of Expression and Freedom of Speech is maintained;
  - liaise during the event in relation to any protest element and liaise with the KCLSU SMT representative in relation to student behaviour in the event venue;
  - witness any inappropriate student behaviour; to make decisions in relation to student behaviour and lead on reporting to Student Conduct and Appeals under 8.26 of King's academic regulations and the Non-Academic Misconduct Policy;
  - be the final decision maker, possibly supported by a Deputy Duty Dean;
- 10.16.** The Duty Dean at medium or high-risk King's or unrated student group organised events has responsibility and authority to:
- endorse the decision making of E&F senior staff or refer elsewhere for decision/urgent action;
  - intervene to discourage inappropriate student or staff behaviour and to ensure that all parties Freedom of Expression and Freedom of Speech is maintained;
  - witness any inappropriate student or staff behaviour; to make decisions in relation to student behaviour and lead on reporting to Student Conduct and Appeals under 8.26 of

King's academic regulations and the Non-Academic Misconduct Policy; To make decisions in the event and lead on reporting of inappropriate staff behaviour under relevant disciplinary procedures set out on the University's Policy Hub;

- be the final decision maker, possibly supported by a Deputy Duty Dean;

### **Responsibilities of Protestors, event attendees and participants in open space gatherings**

- 10.17.** Event attendees should not create a disruptive environment for others in the audience or the speakers by shouting or trying to drown them out with sounds. This is grounds to be asked to leave or be removed from the event.
- 10.18.** Protestors must not take actions that use or threaten violence, intimidate others or constitute hate speech. They must not undermine open debate and the freedom of expression of others. They are expected to comply with lawful and reasonable requests from members of King's staff involved in ensuring the safety, security and legality of an event, protest, demonstration or related activity.
- 10.19.** King's has expected standards of behaviours for all students which are set out in the [Misconduct Policy and Procedure](#) and accompanying [Misconduct Guidance](#). If a student's behaviour falls below these expected standards at a protest, event, open space gathering, or occupation, the Misconduct Procedure will be instigated. If a student is found to have committed misconduct, the University has a range of penalties, such as a warning, a fine, community service, and suspension or expulsion from the University in very serious cases. The full list of penalties can be found in the [Misconduct Policy and Procedure](#).
- 10.20.** King's has expected standards of behaviour for academic and professional services staff and these are outlined in the various relevant disciplinary policies and procedures published on the King's [Policy Hub](#). If a staff member is believed to have breached these expected standards through their activity at a protest, event, open space gathering or occupation, disciplinary action will be initiated, with appropriate action taken.
- 10.21.** On King's premises, protests are only permitted to be conducted by King's staff or students, unless the protest has been booked as a formal event, in which case the normal requirements and restrictions will apply.
- 10.22.** Unless prior arrangements have been made through the event booking process, protestors on campus who are not King's staff or students will be asked to leave campus.
- 10.23.** Protest on-campus is limited to normal campus opening hours, as defined for UG and PGT students. These opening hours are normally visible at the entrances of buildings. Protest outside of normal opening hours amounts to occupation, which is prohibited at King's. This is to protect the safety of those participating in protest.
- 10.24.** Any protest group should appoint a protest leader or organiser, to ensure clear communication with the University. That person should make themselves known to a member of the security staff and will be the point of contact for the group.
- 10.25.** Protestors are obliged to comply with reasonable requests from University officers who will seek to facilitate permissible protest per the criteria above.

- 10.26.** Where the University has offered a designated protest location after a risk assessment or discussion with protestors, it is expected that the protest leader should engage with protestors to ensure compliance.
- 10.27.** Protestors should be aware of other groups and individuals who may attempt to subvert or hijack the protest for their own causes and have a plan to extract themselves from the situation should it become unlawful.
- 10.28.** Protest leaders or speakers should take responsibility to ensure their own language and actions do not incite a gathering to violence or other forms of unlawful or dangerous behaviour where tensions are heightened.
- 10.29.** Protestors should not obstruct paths, roads, entrances and exits from King's venues and campuses. This may constitute an offence under the public highways legislation or breach University health and safety regulations. Protest leaders are accountable for ensuring clear paths of access for members of the King's community and the public.
- 10.30.** No person should engage in any act of intentional or reckless property damage.
- 10.31.** To protect the regular operations of the University and freedom of expression, the use of loudhailers, loudspeakers and other noise-making devices are not permitted on University premises by protestors.
- 10.32.** Where a protest is conducted in relation to a planned event, the protest should not inhibit or disrupt the event from continuing to its planned conclusion. These actions may include but are not limited to blocking or obstructing entry and egress, excessively loud chanting with the effect of drowning out event speakers, or otherwise disrupting or occupying the event.
- 10.33.** Tents or other structures are not permitted on campus, as these may restrict access and evacuation, and cause a health and safety risk.
- 10.34.** Flags, banners and other visual materials are permitted during protests as long as they are used in a manner that adheres to the University's criteria and procedures relating to events, protests and open space gatherings, and are not deemed illegal under UK law. Flags and banners are only allowed in the immediate vicinity of the protest.
- 10.35.** Face-coverings are permitted on campus and are worn for a variety of different reasons including cultural, religious and medical purposes. In some contexts, face coverings may be intimidating for other campus users and this may be reasonably judged to be the intention and/or effect. Where this is the case King's Security will engage and protestors will be required to remove face coverings.

## **11. Monitoring and enforcement**

- 11.1.** Failure to comply with these procedures may result in disciplinary action under the relevant discipline policy and procedures for the individual(s) and entities concerned.
- 11.2.** An annual report on decisions taken under these Procedures will be provided by the Safeguarding Steering Group and Free Expression Management Group to the Vice-Chancellor & President and to Academic Board and the Audit, Risk & Compliance Committee of College Council.

- 11.3.** Data on room bookings will be collected by King's via the King's Venues office. This will include the date and title of events, names of external speakers requested, names of the society, department or individual making the booking and the decisions made on those requests.
- 11.4.** Any group or individual who books a room for an event with an external speaker but does not inform King's or KCLSU of all external speakers and their roles and relevant affiliations in the booking process will put their booking, and future bookings, at risk of cancellation or the application of risk mitigations.
- 11.5.** Data on events will be reviewed periodically by FESAG to ensure that requests are processed effectively and to ensure King's complies with relevant legislation. This includes obligations to ensure freedom of speech and debate as set out in the Higher Education (Freedom of Speech) Act 2023.

## **12. Appeals**

- 12.1.** In the event of an external speaker request being denied, an event being rejected, or conditions/risk mitigations being applied that they find unacceptable, the event organiser (individual or group), shall be entitled to appeal the decision.
- 12.2.** In the first instance, the event organiser should seek informal resolution with the co-chairs of the Freedom of Expression Standing Advisory Group. The co-chairs of FESAG will not conduct a formal investigation but will be able to discuss the outcome and the reasons for the decision in an attempt to resolve the organiser's concerns.
- 12.3.** If no satisfactory resolution can be reached, the organiser is entitled to submit a formal appeal in writing to the Vice Chancellor & President. This should include the basis for the appeal and any evidence to substantiate why the event speaker/event should be approved.
- 12.4.** Every effort will be made to conclude an appeal before the date the event is to be held but this cannot be guaranteed. In the event that an appeal is successful but the proposed event date has passed or is no longer feasible, an alternative date will be offered.
- 12.5.** The Vice-Chancellor & President will expeditiously establish an Appeal Panel to review the decision. Such a panel will be convened with appropriate membership (a minimum of two members plus a chair). If the event under appeal is a student event, one of the panel members must be designated by KCLSU. The panel membership should not include any individual who has been involved in the case heretofore.
- 12.6.** The panel will agree one of the following and their ruling will be final:
  - Refusal or mitigations upheld;
  - Appeal successful with mitigations;
  - Appeal successful without mitigations.
- 12.7.** The panel will aim to review the case and make a decision within 14 days of being established. The panel will determine the conduct of proceedings. It may consult with individuals within or external to the University as it sees fit and will have access to legal counsel if necessary.
- 12.8.** Within five working days of the completion of the appeal hearing, the panel's decision will be communicated in writing to the Vice-Chancellor & President, the co-chairs of FESAG, and the

event organiser by the chair of the Appeal Panel. This is the completion of procedures letter for the appeal process.

**12.9.** The panel will be supported by the University Secretary or a designate.