

## School of Coding & AI

# FREEDOM OF SPEECH AND ACADEMIC FREEDOM CODE OF PRACTICE

## 1. Introduction

### 1.1 Purpose

This Code of Practice (Code) sets out the arrangements whereby School of Coding & AI (SOC) fulfils its duties under the Higher Education and Research Act 2017 (as amended by the Higher Education (Freedom of Speech) Act 2023) to ensure freedom of speech within the law is secured for its members, students and staff, and for visiting speakers.

This Code sets out SOC's approach and procedures regarding freedom of speech, including SOC's expectations, and details the approach to be taken not only with regard to visiting speakers but also in respect of teaching, the curriculum and research activities.

### 1.2 Scope

This Code applies to:

- all staff and students of SOC;
- members of SOC;
- visiting speakers and all other persons invited or otherwise lawfully on SOC's premises;
- any teaching, research, meetings, events, online activities, and other academic or governance activities that take place on SOC's premises, as well as those that are organised and sponsored/approved by SOC but held on other premises, whether for SOC staff or students, the public or a discrete group or association.

All persons to whom this Code applies are under an obligation to take no action which would hinder freedom of speech within the law or academic freedom, or which would prevent SOC from discharging its duty to secure freedom of speech within the law and academic freedom.

This Code applies to informal or social activities as well as to any more formal meeting or lecture, in person and online. Examples include visiting lecturers invited by academic staff, religious or political representatives speaking on campus, and events such as debates, speeches and conferences taking place using SOC facilities that have been organised by staff, students or external bodies.

References in this Code to "SOC's premises" means those premises over which SOC exercises control (including online or virtual classrooms and communication spaces).

For the avoidance of doubt, this Code does not apply to purely commercial meetings or events on SOC's premises.

This Code will be posted in a prominent position on SOC's intranet and website.

### 1.3 Definitions

- **Freedom of speech:** the freedom to impart ideas, opinions, or information (referred to in Article 10(1) of the European Convention on Human Rights as it has effect for the purposes of the Human Rights Act 1998) by means of speech, writing or images (including in electronic form), as long as this is within the law.
- **Academic freedom:** the freedom within the law for academic staff to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without being at risk of being adversely affected. An individual is deemed to have been adversely affected if they lost their job or privileges at SOC, or experienced a reduction in the likelihood that they would secure a promotion or a different job at SOC.
- **University Partner(s):** OfS registered Universities for whom SOC provides services such as recruitment and admissions, learning and teaching and related support services.

## 2. Key Concepts

Freedom of speech means the right to express lawful views and opinions freely, in speech or in writing, without interference.

Freedom of speech within the law is protected. This means that freedom of speech will not be protected if it contravenes some other law, and illegal or unlawful acts will not be tolerated by SOC.

SOC has a duty to protect its staff and students from unlawful discrimination, harassment, intimidation or threats of violence on the grounds of race, sex, age, religion or philosophical belief, sexual orientation, disability, gender reassignment, marriage and civil partnership, or pregnancy or maternity. However, the provisions of the Equality Act 2010 should not be interpreted to undermine freedom of speech and academic freedom within the law. As a result, students' learning experience and the working environment of staff may include exposure to research, course material, discussion or speaker's views that they find offensive, contentious or unacceptable, but are nonetheless within the law, and unlikely to be considered unlawful harassment or discrimination under the Equality Act 2010.

There are other legislative requirements that may be relevant in particular cases. For example, there are offences if speech encourages terrorism or amounts to the incitement of religious or racial hatred under the Terrorism Acts or hatred on the grounds of sexual orientation under the Public Order Acts, as well as statutory requirements relating to the holding of processions and assemblies. SOC is not under any obligation to secure or promote freedom of speech that contravenes any legislative requirements.

SOC is committed to ensuring that academic staff have the freedom to question and test received wisdom and put forward new ideas and opinions without placing them at risk of using their job, privileges or future opportunities. Academic freedom shall extend to all academic staff and to any visiting or guest lecturer invited by SOC.

### 3. Principles and Values

#### 3.1 Policy principles

SOC will:

- take reasonably practicable steps to secure freedom of speech within the law, having particular regard to its importance.
- promote and protect academic freedom, ensuring staff can teach and research controversial or unpopular areas without fear of victimisation or unreasonable restrictions, provided speech remains within the law.
- ensure that programmes, teaching, and assessment are not shaped by external agreements (i.e. with University Partners and others) or arrangements that would restrict freedom of speech or academic freedom within the law.

#### 3.2 SOC's values relating to freedom of speech and academic freedom

SOC strongly supports freedom of speech as a core value of any learning institution. This means everyone should feel able to question widely accepted views, challenge others' opinions and share ideas within the law that may be shocking, disturbing or offensive. These freedoms help ensure that students develop the skills to question, debate, think critically and develop confidence in forming and discussing their own views and opinions. Freedom of speech and academic freedom therefore receive a very high level of protection.

Everyone involved in teaching and research at SOC — including students, staff, and visitors — accepts a responsibility to support open and lawful discussion. We encourage staff and students to share ideas and perspectives and to be tolerant and respectful of those with views different from their own. No individual or group should be harassed or bullied because of their views.

The starting point is that speech is permitted, unless otherwise restricted by law. SOC will ensure that the use of SOC's premises is not denied on grounds connected with the beliefs, views, policies or objectives of an individual or body, as long as such use is at all times within the law. All events taking place on SOC's premises are private, unless the public is expressly invited to attend.

Our approach to ensuring freedom of speech and academic freedom within the law will be based on the following values:

- (i) freedom of speech is at the heart of all democratic societies and a foundation stone of further and higher education;
- (ii) the promotion of a culture of tolerance of differing views and perspectives and an acceptance that, in a free and open environment of academic debate, ideas will be robustly contested and challenged; and
- (iii) that there is a high level of protection for lawful expression of a viewpoint and any restriction that may be required shall be an exception.

### 3. Roles and Responsibilities

Role	Key Responsibilities
Board of Directors	<ul style="list-style-type: none"> <li>- Maintain and regularly review this Code.</li> <li>- Promote the importance of freedom of speech and academic freedom within SOC and to its University Partners and stakeholders.</li> <li>- Ensure that governance, risk and compliance arrangements include consideration of freedom of speech where this is relevant to SOC’s activities.</li> </ul>
Principal and OfS Accountable Officer	<ul style="list-style-type: none"> <li>- Oversees the implementation of this Code.</li> <li>- Seeks specialist advice as needed to ensure SOC remains compliant with its duties to protect and promote freedom of speech and academic freedom within the law.</li> <li>- Responds to appeals to complaints made under this Code.</li> </ul>
Chief Operating Officer	<ul style="list-style-type: none"> <li>- Manages the Procedure for the Management of Events, Meetings and Visiting Speakers (set out in section 5 below).</li> </ul> <p><i>N.B. In the absence of the Chief Operating Officer this responsibility will be delegated by the OfS Accountable Officer (on a temporary basis) to another member of the senior management team.</i></p>
Staff and Students	<ul style="list-style-type: none"> <li>- Respect the right of others to express lawful views, even if they strongly disagree with them.</li> </ul>

	<ul style="list-style-type: none"><li>- Avoid behaviour that would intimidate, harass, or silence others, or that would unlawfully discriminate.</li><li>- Raise concerns about potential restrictions on lawful speech or academic freedom via the Chief Operating Officer.</li><li>- Follow the Procedure for the Management of Events, Meetings and Visiting Speakers in section 5 and ensure that review and approval has been granted <b>before</b> an event or visit by a visiting speaker takes place.</li></ul>
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#### 4. Promoting and securing freedom of speech at SOC

SOC promotes and secures freedom of speech with a range of actions including:

- publication of this Code on its website;
- a procedure for booking visiting speakers (see section 5);
- drawing attention to this Code to new staff during induction and new students at registration;
- drawing the attention of students to the Code and the accompanying statement about the Code annually;
- ensuring that all staff receive training on freedom of speech and academic freedom;
- periodically surveying staff, students and other stakeholders to secure their views on whether freedom of speech and academic freedom at the institution are being adequately protected and take the findings into account;
- publication of information for students and staff on freedom of speech and academic freedom;
- ensuring that academic staff are free, within the law, to determine teaching content, assessment methods, and research topics, subject to the policies, procedures and template documents provided by University Partners for quality management purposes;
- Ensuring that academic staff are not penalised, excluded, or disadvantaged because of their lawful expression of views or pursuit of controversial yet lawful research;
- ensuring that new policies, procedures and training reflect our freedom of speech commitments, do not curtail lawful free speech and that consideration is given to their impact on free speech and academic freedom;
- monitoring any concerns that have been raised about freedom of speech and academic freedom to ensure that they are addressed so far as is reasonably practical and that any lessons learned are incorporated into a review of relevant policies practices and procedures; and
- taking steps to secure compliance with this Code, including where appropriate disciplinary action.

SOC will ensure that its teaching and research arrangements, and policies and procedures reflect its duties to promote and ensure, so far as is reasonably practicable, freedom of speech and academic freedom within the law. In particular:

- its processes for programme development and approval, quality assurance and academic assessment will respect the rights of freedom of speech and academic freedom;
- its processes for facilitating research will respect the rights of freedom of speech and academic freedom;
- no individual will be subjected to disciplinary action or other less favourable treatment by or on behalf of SOC because of the lawful exercise of freedom of speech or academic freedom; and
- it will not restrict the exposure to students of ideas because they are controversial or unpopular or because some (or many) may find them offensive.

It should be noted that association with SOC, as an academic institution, confers a degree of authority and legitimacy on views and provides privileged access to a scholarly audience for the speakers it hosts. In assessing what is reasonably practicable to do to ensure and promote freedom of speech and academic freedom in any case, SOC does not regard itself as obliged to provide a platform to individuals who wish to promote views that are manifestly at odds with empirically verifiable objective facts or not susceptible to reasoned enquiry and debate. Staff and students making decisions about invitations to speakers should always assess carefully the contribution that a discussion or event will make to the advancement of education in a higher education setting, and what form the event should take to best deliver that outcome.

SOC does not enter into non-disclosure agreements related to complaints about sexual misconduct, bullying or harassment.

SOC is aware that the terms of certain overseas funding, including funding from endowments, gifts, donations, research grants and contracts, and educational or commercial partnerships, from any overseas country, may present a risk to freedom of speech and academic freedom. Therefore, SOC has processes in place to ensure that risks to freedom of speech or academic freedom are identified and appropriately managed.

In assessing its compliance with its duties, SOC shall apply a three-step framework when assessing any measure or decision that might affect freedom of speech, as follows:

- **Step 1** – an assessment as to whether the speech is within the law.
  - If yes, it will consider Step 2.
  - If no, the duty to secure free speech does not apply.
- **Step 2** – consideration as to whether there are any reasonably practicable steps (positive or negative) to secure the speech.
  - If yes, those steps shall be taken.
  - If no, SOC will consider Step 3.

The following, amongst other considerations, are unlikely to be relevant when considering what steps are reasonably practicable:

- a. the viewpoint that any affected speech expresses, including but not limited to:
  - i. whether it aligns with SOC aims or values;
  - ii. whether it is controversial or offensive;
  - iii. whether external or internal groups (for example alumni, donors, lobbyists, domestic or foreign governments, staff or students) approve of the viewpoint that the speech expresses.
  
- b. the reputational impact of any affected speech on SOC.

Legal and regulatory obligations may affect whether a step is reasonably practicable. Where SOC is required by law not to do something, then doing it (e.g. permitting the speech) would be unlawful and therefore not reasonably practicable.

- **Step 3** – if there are no reasonably practicable steps to secure speech, SOC will ensure that its restriction/regulation of speech is prescribed by law and proportionate under the European Convention on Human Rights.
  - If yes, the restriction/refusal is consistent with free-speech obligations.
  - If not, the restrictions shall not be implemented as this would be inconsistent with SOC's free-speech duties, and SOC will reconsider Step 2.

## 5. Procedure for the management of events, meetings and external speakers

SOC recognises the importance of protecting freedom of speech within the law when organising meetings, events and visiting speaker activities. All event organisers must follow SOC's event's approval process, which is managed by the Chief Operating Officer and overseen in line with this Code as set out below.

For any event held under this Code, event organisers must:

- submit an application using SOC's event approval form at Annex A at least a month before the event is due to take place;
- specify the purpose of the event, the proposed content, and any third-party involvement;
- indicate whether the event is integral to SOC's academic or business purposes (for example, curriculum-related teaching and research).

The Chief Operating Officer manages the process, including:

- reviewing all applications where visiting speakers are invited to take part in an event within 7 days of submission;
- ensuring that applications are considered against the criteria set out in this Code, including the need to secure lawful speech, safety and the prevention of disorder or crime;
- following the three-step process set out above to determine whether there are reasonably practicable steps that SOC can take to secure the speech.

Where appropriate, links to proscribed organisations will be checked and advice sought from relevant external bodies, such as the police, Local Channel Panel members, or the Regional Prevent Coordinator. To meet our Prevent Duty obligations, we will also take account of guidance issued by the Office for Students.

Events may also be subject to safety and security considerations. It is the responsibility of the event organiser to ensure they follow SOC's health and safety procedures.

SOC will consider what proportionate and mitigating actions can be put in place to reduce or manage any identified risks to enable the request to be approved. These may include but are not limited to:

- requirements as to the provision of security/stewards;
- variation of location and time;
- whether such a meeting shall be open to the public at large;
- the speaker being part of a panel debate; the appointment of an independent chair; the recording of the speech; or
- ensuring that a member of staff is in attendance.

SOC shall ensure that such conditions or requirements go no further than is necessary to address the risks identified.

Other than in exceptional circumstances, the costs of security relating to the use of SOC's premises shall not be passed to the person or organisation arranging the event. Circumstances shall be exceptional when the security costs exceed £250. SOC's decision on whether to pass on costs will not to any extent be influenced by:

- (i) in relation to any individual, their ideas or opinions;
- (ii) in relation to anybody, its policy or objectives or the ideas or opinions of any of its members; and
- (iii) in relation to the event, the ideas or opinions likely to be expressed at it,

provided these are within the law.

Where SOC is reasonably satisfied that the otherwise lawful expression of views at any event is likely to give rise to disorder or threats to the safety of participants or the wider SOC community, SOC shall consider the steps necessary to take to ensure:

- (i) the safety of all persons;
- (ii) the maintenance of order; and
- (iii) the security of SOC's premises.

Where SOC concludes that imposing conditions would not be sufficient to prevent serious disorder within premises subject to its control, it may decline to permit a meeting to proceed.

Appeals of decisions regarding event approval made by the Chief Operating Officer or another member of the Senior Management Team will be considered by the Principal, whose decision will be final.

Any final decision to refuse will be:

- clearly recorded, including the reasons for the decision and any alternatives considered; and
- reported to the Board of Directors where the decision is likely to attract external attention, reflects a pattern of concerns about freedom of speech or academic freedom or raises governance or reputational risk for SOC or a University Partner.

## 6. Conduct at Events

Everyone has the right to free speech within the law. SOC expects students, staff, and visitors to ensure that freedom of speech within the law is assured.

SOC seeks to expose its staff and students to the widest possible range of ideas and views. All persons to whom this Code applies are required to observe the principle of freedom of speech and expression while on SOC's premises and shall show tolerance towards the expression of views, opinions and beliefs of others, even though those views, opinions or beliefs may run contrary to their own personal views, opinions or beliefs.

A member of staff or student who organises an event on SOC's premises shall be responsible for ensuring, as far as is reasonably practicable, that the event is conducted in a manner to promote freedom of speech whilst maintaining good order and academic discipline and does not involve or lead to damage to property or an infringement of the law. Speakers remain responsible for their own compliance with the law.

SOC staff and students are required to ensure that they do not wilfully engage in conduct that prevents, obstructs or disrupts the holding or orderly conduct of any meeting or other lawful activity that takes place on SOC's premises.

Nothing in this Code shall be taken to prohibit the lawful exercise of the right to peacefully protest. Protests against an event must be conducted without infringing the rights of others, including others' rights to freedom of speech. No protest should prevent an event allowed under this Code from going ahead as scheduled.

Infringements of, or departures from, this Code in whatever respect may render those responsible subject to disciplinary proceedings. In addition to disciplinary proceedings, breaches of the law may give rise to prosecution. All students and members of staff are under an obligation to assist with any investigation into any allegations of a breach of this Code.

## 7. Breaches and Complaints

If an offence is allegedly committed at or in connection with an event or activity to which the provisions of this Code apply, in addition to any internal disciplinary procedures for staff or students that may be appropriate, SOC may take steps to assist the police in identifying any persons committing offences.

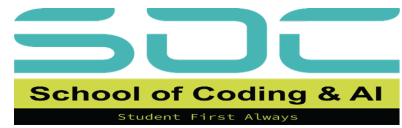
Any concerns or complaints regarding this Code or the actions of SOC in respect of it should be directed to Head of Student Support in the first instance.

Where SOC receives a concern about the exercise of academic freedom or freedom of speech or there has been an infringement of or departure from the procedures set out in this Code, SOC shall investigate accordingly. SOC shall implement a rapid triage process to ensure the swift dismissal of complaints about speech that do not warrant further investigation. Subject to the outcome of the initial investigation, such allegations may lead to further investigation in accordance with SOC's disciplinary procedures, which could be under the Student Disciplinary Procedure (partner university procedure is followed), the Staff Disciplinary Procedure, or SOC's grievance or complaints procedures.

## Monitoring and Review

SOC shall record all decisions that are likely to have a substantial (positive or negative) effect on freedom of speech within the law.

**SCHOOL OF CODING LIMITED**  
(Company No. 10808021)



This Code will be reviewed annually.

**Approved by:** Board of Directors  
**Approved on:** 18th June 2026

**Policy No:** 26/v1  
**Document owner:** Principal

## Annex A – Event Approval Form

<b>Organiser Details</b>	
Name:	
Role:	
Contact email:	
Phone number:	
<b>Submission Date for this form:</b>	
<b>Event Details</b>	
Proposed Date/time:	
<b>Event Type</b> Is this event related to:  Normal teaching, research, or partnership related academic activity? <input type="checkbox"/> Yes <input type="checkbox"/> No  Primarily political, campaigning, or advocacy focused? <input type="checkbox"/> Yes <input type="checkbox"/> No  If not integral to SOC's academic or business purposes, please explain the rationale for hosting it:            	
Event Title:	
Location (inc. physical or online):	
Event Description - <i>Please briefly describe the event (aim, audience, format, expected number of participants):</i>	
<b>Visiting speakers</b>	
<i>If visiting speakers are involved, please complete the following:</i>	
Speaker name(s):	
Organisation(s):	
Contact email(s):	

Are any of the speakers speaking on behalf of a political party, campaigning organisation, or other group?	
If Yes, please provide details:	
<b>Risks</b>	
<p>Please indicate any potential risks and how they will be managed (you may tick and/or describe):</p> <p>Risk of unlawful speech (e.g. incitement, hate speech): <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Security or public-safety concerns (crowd, protests, etc.): <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
Brief description of risk-management plans (e.g. chair/mediator, code of conduct, time limits, moderation):	
<b>Materials and content</b>	
<p>Will any materials (posters, leaflets, slides, videos, online links, etc.) be shared or exhibited at the event? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe briefly and confirm whether anyone has reviewed them for compliance with this Code and the law:</p>	
<b>Assessment and Decision by Chief Operating Officer (or alternate)</b>	
<p>Have the criteria in SOC's Freedom of Speech and Academic Freedom Code been considered? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Is the event integral to SOC's academic or business purposes? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Does the Chief Operating Officer see significant risk that the event is likely to:</p> <p>incite a breach of the law? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>promote or support an illegal organisation? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>conflict with public safety, prevention of disorder or crime, or protection of those on SOC's premises or online spaces? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

If any of the above is “Yes”, please explain and outline any conditions or safeguards (e.g., conditions of use, time limits, moderation, or alternative arrangements):

Decision:

- Approval to proceed as proposed
- Approval to proceed with conditions (see above)
- Postponement / rescheduling
- Refusal to approve

Name of approving officer:

Signature:

Date:

### Reporting to the Board of Directors

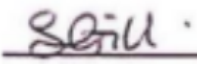
Should this decision be reported to the Board of Directors (e.g., because it may attract external attention or reflects a pattern of concerns)?

- Yes     No

If “Yes”, please indicate:

Brief summary for Board note (attach separate sheet if needed):

Name of provider: School of Coding & AI Ltd  
Name of nominated accountable officer: Suki Gill  
Designation: Principal

Signature: 

Date: 18th June 2026