

Code of Practice on Freedom of Speech

Effective date: 5 November 2025

Last reviewed/updated: 18 June 2025

Next review date: Trinity term 2028

Policy owner: Bursar

Approved by: Governing Body on 18 June 2025; updates approved by Management Executive Team on 5 November 2025

1. Purpose

- **Objective:** This updated Code of Practice sets out St Antony's College's values and expectations relating to freedom of speech and academic freedom and how these values and expectations are applied to College activities.
- **Scope:** This Code of Practice applies to all activities on College premises including those booked by Fellows, students, staff, and College Members, visiting speakers¹ invited to speak by any such people, and events booked by external parties.

2. Definitions

- **Freedom of speech** means the freedom within the law to receive and impart ideas, opinions or information by means of speech, writing or images (including in electronic form).
- **Academic freedom** is a separate but complementary right as further provided for by the University in [Statute XII](#). It applies in relation to academic staff at the College and means their freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, including their opinions about the College, without institutional censorship and without placing themselves in jeopardy of losing their jobs or privileges.
- **References** in this Code of Practice to '**College premises**' means all land, buildings, or other premises owned, leased or occupied by the College or under the day-to-day control of the College.

¹ A 'visiting speaker' means a person who has been invited to speak at the College by a member, student or College employee (including Governing Body Fellows) acting in their capacity as a member, student or College employee.

3. Legislative framework

- The legal duty of UK universities to protect free speech and academic freedom is enshrined in the Higher Education Freedom of Speech Act 2023 (the 'Act'). Academic freedom is protected under the Education Reform Act 1988. Freedom of speech is also protected under Article 10 of the European Convention on Human Rights which has effect in the UK through the Human Rights Act 1998.
- Part A1 of the Act states that:
 - (1) The governing body of a registered higher education provider must take the steps that, having particular regard to the importance of freedom of speech, are reasonably practicable for it to take in order to achieve the objective in subsection (2).
 - (2) That objective is securing freedom of speech within the law for:
 - a) staff of the provider,
 - b) members of the provider,
 - c) students of the provider, and
 - d) visiting speakers.
 - (3) The objective in subsection (2) includes securing that the use of any premises of the provider is not denied to any individual on the basis of their ideas or opinions or in respect of their ability to put forward new ideas and controversial or unpopular opinions so that they are not placed at risk of being adversely affected so that they lose their positions or privileges within the College or their chances of promotion or securing different positions is reduced.

4. Values

- **Overview:** Freedom of speech within the law and academic freedom are central tenets of College life and must be robustly protected.
- **Specific Provisions:** In all its activities, the College works within the context of its [values](#) of being *outward-looking, respectful, diverse, and curious*, to:
 - a. secure and promote civic and academic freedoms including freedom of speech
 - b. ensure a very high level of protection for the lawful expression of a viewpoint and for speech in an academic context, and
 - c. foster a culture of openness and inclusion, in which members of our community engage with each other, and the public, in debate and discussion, and remain open to both intellectual challenge and change.

Inevitably, this will mean that members of the College are confronted with views that some find shocking, disturbing or offensive. The College believes that a culture of free, open and robust discussion can be achieved only if all concerned engage critically but courteously with each other.
- Within the bounds prescribed by law, all voices or views which any member of our community considers relevant should be given the chance of a hearing. They should also be exposed to evidence, questioning and argument. As an integral part of this commitment to freedom of expression, we will take steps to ensure that all such exchanges happen peacefully and respectfully. With appropriate regulation of the time, place and manner of

events, members of our community should have no reasonable grounds to feel intimidated or censored.

5. Conduct

- The College is committed to fostering an inclusive culture which promotes equality, values diversity and maintains a working, learning and social environment in which the rights and dignity of all members of the College community are respected.
- In accordance with the terms of its [Policy and Procedure on Harassment](#), the College does not tolerate any form of harassment or victimisation and expects all members of the College community, its visitors and contractors to treat each other with respect, courtesy and consideration.
- Peaceful protest is a legitimate expression of freedom of speech. However, such protest must not shut down debate nor cause substantial disruption to College activities. The respect which the College expects all members of the College community to demonstrate towards each other is particularly important where it comprises respect for the right of others to speak freely and exercise their academic freedom. Staff, students and members of the College wishing to protest either on College premises or on non-College premises in a manner which may disrupt College activities, must seek permission in advance by referring the matter under the College's **guidelines on protests, demonstrations or similar gatherings, available as Annex B** of this Code. Carrying out such protests without permission may lead to disciplinary action under the relevant procedures (as set out under Section 7 'complaints', below).
- Conduct of all College members is governed by this Code of Practice and the relevant policies and procedures listed in Section 9 below.
- A breach of this Code may lead to disciplinary action being taken under the appropriate College procedure (including staff disciplinary procedures for staff or the [Student Non-Academic Disciplinary Procedure](#) for students). The [Code of Conduct](#) applies to all those connected or working with the College.

6. College Activities, including Meetings and Events

- The College ensures that its research, policies and procedures reflect its duties to secure, so far as is reasonably practicable, and having particular regard to their importance, freedom of speech and academic freedom within the law.
- This Code of Practice therefore applies to the College procedures to be followed by staff and students (including College Common Rooms and Societies) when organising any activities that relate to academic life, whether those activities take place on or off College premises, including activities relating to: admission, appointment, reappointment, employment and promotion of staff, disciplinary matters, equality, diversity and inclusion, fitness to practice, harassment and bullying, IT, social media, Prevent duty, research ethics, speaker events, staff and student codes of conduct.

- In making decisions or adopting policies that could directly or indirectly (and positively or negatively) affect freedom of speech, the College will take into account:
 - a. the importance of academic freedom (as required eg by the Education Reform Act 1988 and the Act)
 - b. the need to take reasonably practicable steps, to ensure that freedom of speech within the law (including academic freedom) is secured for members, students and employees of the College and for visiting speakers (as required eg by the Act)
 - c. the rights and freedoms enshrined in the European Convention on Human Rights and incorporated into domestic law by the Human Rights Act 1998
 - d. the Public Sector Equality Duty established by the Equality Act 2010 which requires universities to have due regard to the need to eliminate unlawful discrimination, promote equality of opportunity, and foster good relations between different groups, and
 - e. the [Counter-Terrorism and Security Act 2015](#) which requires universities to 'have due regard to the need to prevent people from being drawn into terrorism' (section 26 (1)) and which also provides that 'when carrying out the duty imposed by section 26 (1)', universities 'must have particular regard to the duty to ensure freedom of speech; and to the importance of academic freedom.'

- The College will follow the three-step procedure set out in the Regulatory Advice, as detailed at Annex A and in [Regulatory Advice 24: Guidance related to freedom of speech](#), Section 2 'Framework for Assessment'.

- Through the implementation of this Code, the College takes reasonably practicable steps to ensure that freedom of speech within the law is secured within its community and that the use of its premises and services is not inappropriately denied to any of the individuals listed in section 3 above on any ground connected with their beliefs or views or the policy or objectives of a body of which they are a member. The College acts in a risk-based and proportionate manner and will always aim to allow an event to go ahead, provided that it is within the law and does not shut down debate, pose unacceptable risks to individuals or cause substantial disruption to College activities and will work with the organisers towards this goal. Cancellation of events is undesirable and should be exceptional. Speakers should be exposed to evidence, questioning and argument.

- A member, student (including Common Rooms and College Societies) or employee of the College who is organising a meeting or event (including those that take place online) or is responsible for administering external bookings of College premises (the 'Organiser') is responsible for assessing those meetings and events in the context of this Code together with relevant conference and booking policies and other relevant College policies.

- **In the any of the following circumstances**, the Organiser **MUST** follow the procedure outlined in **Annex A**:
 - (a) the meeting or event may give rise to an environment in which people will experience, or could reasonably fear, discrimination, harassment, intimidation, verbal abuse or violence, particularly (but not exclusively) on account of their age, disability, gender reassignment, marriage or civil partnership, pregnancy, maternity, race, religion or belief, sex or sexual orientation

- (b) the event could involve the use of College premises for any purpose or in any manner that may cause damage to College premises; loss or damage to any person or put the College in breach of any law or obligation (contractual or otherwise) to any person
 - (c) the event may shut down debate or prevent others from speaking freely or exercising their academic freedom, and/or
 - (d) the meeting or event may pose a risk to the safety of any person.
- If Organisers are in any doubt or have any questions or need for further information, they are encouraged to discuss the situation with the Head of Operations & Estates in the first instance, and then seek advice, as appropriate, from the Dean (for student events) or Sub-Warden (for all other events) and/or University Security Services.
 - No meeting or event which is proposed to be held on College premises may be refused, cancelled or altered as a result of the ideas or opinions (in the case of an individual, or a member of a body) or the policy or objectives (in the case of a body) of the individual or body seeking to hold the meeting or event, save as a result of consideration by the Dean (for student events) or Sub-Warden (for all other events).

7. Complaints

- Complaints that the College, or its employees or students or College Members, have breached their duties in relation to freedom of speech may be raised by any of the individuals listed in section 3 above. Complaints may also be brought by a person who was formerly within one of those categories, where their complaint relates to events which occurred while they had that status and which impacted them in that capacity. This includes recently-registered² students where their complaint relates to events which occurred while they were a student and which impacted them in that capacity.
- The appropriate procedure for raising such complaints is as follows:
 - (a) complaints by members of staff should be addressed under any applicable grievance procedure (available in the Employee Handbook) unless they are related to other complaints and/or form part of an existing complaint, and/or fall under the scope of another staff procedure, in which case they should be raised within the procedure associated with those other complaints (eg the Harassment or disciplinary procedure)
 - (b) complaints by students should be raised under the [Student Complaints Procedure](#) unless they are related to other complaints and/or form part of an existing complaint under another procedure in which case they should be raised within the procedure associated with those other complaints (eg the Harassment Procedure etc)
 - (c) complaints by any other individual falling within section 3 above (eg visiting speakers or College staff, members or students applying for new positions) should in the first instance be made to the Warden (warden@sant.ox.ac.uk).

² As set out in our [Complaints Procedure](#), students have access to this procedure for a maximum period of three months after their studies have concluded or been terminated before completion of their course. For PGT students, conclusion/termination means the official end date or an agreed extended date for submission of any last assignment or exams. For PGR students, conclusion/termination means the date on which the relevant academic department/faculty issues Leave to Supplicate.

- Complaints that arise in the University context (ie, in the course of University activity or on University premises) should normally be made to the University. On receipt of any such complaint, the College will consider the most appropriate procedure to be followed, in consultation with relevant colleagues and the complainant, and in some cases they may refer the matter to be considered under a different more appropriate procedure.
- Complaints should be made within three months of the event or activity, extendable where not reasonably practicable to complain within that time period.
- The Office for Students (OfS) will operate a free speech complaints scheme. Under that scheme, the OfS can, at its discretion, review complaints about free speech from members, staff, applicants for academic posts and (actual or invited) visiting speakers. Information about the complaints that the OfS can review will be available on its website.

8. Monitoring and Review

- **Review Cycle:** St Antony's College will periodically review the contents and operation of this Code of Practice and report on its operation and recommend amendments to it for consideration by Governing Body as appropriate or necessary.

9. Related Documents

- **References:**
 - [Policy and Procedure on Harassment](#)
 - [Staff Handbook](#) (Single Sign-On required)
 - [Student Complaints Procedure](#)
 - [Code of Conduct](#)
 - [Code of Student Discipline](#)
 - [Equality Policy](#)
- The University and the Oxford Students' Union each have their own Codes of Practice on Freedom of Speech.

10. Contact Information

Policy owner: bursar@sant.ox.ac.uk

ANNEX A: Procedures for Meetings and Events meeting the conditions 6(a)-(d) of the Code of Practice on Freedom of Speech

This Annex is issued under Section 6 (College Activities, including Meetings & Events) of the College's Code of Practice on Freedom of Speech (the 'Code').

Organisers contact the Events Team (events@sant.ox.ac.uk) for meetings or events on College premises.

A minimum of 14 days' notice is required if any of the following circumstances may apply:

- a. the meeting or event may give rise to an environment in which people will experience, or could reasonably fear, discrimination, harassment, intimidation, verbal abuse or violence, particularly (but not exclusively) on account of their age, disability, gender reassignment, marriage or civil partnership, pregnancy, maternity, race, religion or belief, sex or sexual orientation
- b. the event could involve the use of College premises for any purpose or in any manner that may cause damage to College premises; loss or damage to any person or put the College in breach of any law or obligation (contractual or otherwise) to any person
- c. the event may shut down debate or prevent others from speaking freely or exercising their academic freedom, and/or
- d. the meeting or event may pose a risk to the safety of any person.

Where a meeting or event falls under any of (a)-(d) above, the Organiser should also formally notify the following:

- For student events: the Dean via email dean@sant.ox.ac.uk, copy to the Events Team at events@sant.ox.ac.uk.
- For all other events: to the Sub-Warden via email sub-warden@sant.ox.ac.uk, copy to the Events Team at events@sant.ox.ac.uk.

In the context of this Code, the Dean (for students) and Sub-Warden (for others) is entrusted with the duty to assess the implications of events formally referred to them and to act in accordance with the College's legal responsibilities, including as set out in the conduct and procedures in this Code.

On receipt, the case will be assessed by the Dean (for students) or Sub-Warden (for others) who will consult with the Welfare Team or Warden as appropriate. The starting point for the Dean (for students) or Sub-Warden (for others) considering a particular event will be that the event should be allowed, unless there are compelling and exceptional reasons for it not to proceed. In doing so, the College will follow the three-step procedure set out in the Regulatory Advice, as follows:

- Step 1: Is the speech 'within the law'? If yes, go to step 2. If no, the duty to 'secure' speech does not apply.
- Step 2: Are there any 'reasonably practicable steps' to secure the speech? If yes, take those steps. Do not restrict the speech. If no, go to step 3.
- Step 3: Are any restrictions 'prescribed by law' and proportionate under the European Convention on Human Rights?

For further guidance, see [Regulatory advice 24: Guidance related to freedom of speech](#), Section 2 'Framework for Assessment', especially pages 7-9.

As required by section 12 of the Terrorism Act 2000, the Dean/Sub-Warden will not give permission to hold a meeting or event where it is known that:

- (a) the proposed speaker belongs to, or professes to belong to, a [proscribed organisation](#); or
- (b) the proposed speaker will use the event to support, or to further the activities of, a proscribed organisation.

In exceptional circumstances, it may be reasonable to refuse permission for a College meeting or event where the Dean/Sub-Warden reasonably believes (from the nature of the speakers or from similar activities in the past whether held at the College or otherwise) that:

- the views likely to be expressed by any speaker are contrary to the law
- the intention of any speaker is likely to incite breaches of the law or to intend breaches of the peace to occur
- the meeting is likely to include the expression of viewpoints that are reasonably believed to be highly controversial and the Organiser will not permit contrary or opposing viewpoints to be held or expressed (for example by inviting questions)
- the views likely to be expressed by any speaker are for the promotion of any illegal organisation or purpose, including organisations listed on the government's list of proscribed terrorist groups or organisations
- the event is likely to shut down debate or prevent others from speaking freely or exercising their academic freedom
- the event is a protest which involves any person occupying or setting up camp on College premises
- the event is likely to involve the use of College Premises for any purpose or in any manner that may cause damage to College premises or loss, damage, or injury to any person or put the College in breach of any law or obligation (contractual or otherwise) to any person
- the event is likely to cause substantial disruption to College activities which cannot be mitigated by any conditions that may be imposed by the Dean as set out below
- it is in the interest of public safety, the prevention of disorder or crime, that the meeting does not take place.

The lawful expression of controversial or unpopular views will not in itself constitute reasonable grounds for withholding permission for a College meeting or event.

Where the College is reasonably satisfied that the otherwise lawful expression of views at an event or meeting on College premises is likely to give rise to disorder or threats to the safety of any person, the Dean/Sub-Warden shall consider what steps it is necessary to take to ensure the safety of all persons and the security of College premises. This might include postponing or relocating a meeting or event or imposing conditions. The responsibility for fulfilling these conditions rests with the Organiser.

You may also be required to carry out a risk assessment for each meeting or event falling under this Code of Practice.

Where the College decides that the meeting or event requires security, then, except as set out below, the College will cover the costs of security for using the College's premises for a meeting or event falling under the Code, up to a cap of £500.

If the security costs exceed £500, which the College anticipates would be an exceptional circumstance, the College will pass on to the event organiser the security costs over and above £500.

The College will not cover any security costs for using the College's premises in the following exceptional circumstances:

- where the costs are wholly disproportionate to the numbers likely to be attending the event and the event could be held in a more proportionate way
- where the visiting speaker could reasonably be expected to have their own security because of the political or state office they hold
- where those involved do not fall within the categories of persons listed in section 3 of the Code.

Any request to pay security costs will not be influenced to any degree by the ideas or opinions of any individual involved in organising the event or meeting, or by the policy or objectives of, or the views of any of the members of, anybody involved in organising the event.

In the exceptional event that security costs are to be passed on to the event organiser, the College will supply the event organiser with a clear written summary of its calculation of the expected security costs and an explanation for this calculation. The summary may be appealed by submitting an appeal in writing to the Warden.

In the event that:

- a meeting or event falls under Section 6 of the Code but the Organiser does not notify the Dean/Sub-Warden; or
 - the Dean/Sub-Warden reasonably considers that the risk cannot be mitigated by the imposition of conditions, or
 - the Dean/Sub-Warden reasonably believes that the Organiser will not comply with the conditions,
- then in each case the Dean/Sub-Warden can refuse consent for the meeting or event to go ahead and/or cancel the meeting or event. They may do so even if the relevant College procedure has not been exhausted.

If the Organiser does not comply with the College's conditions or goes ahead with the meeting or event after the Dean/Sub-Warden has refused consent or cancelled the meeting or event, then such action may lead to disciplinary action under the relevant procedures (as set out in Section 5 of the Code).

The Dean/Sub-Warden will communicate their decision promptly and will set out the reasons for the decision.

The Events Team (events@sant.ox.ac.uk) will be copied to all correspondence for the purpose of record-keeping.

If any of the individuals listed in section 3 of the Code is dissatisfied with the decision of the Dean/Sub-Warden in relation to a meeting or event, they may refer the matter under the relevant complaints procedure, as set out in Section 7 of the Code.

If the event is a protest³ by any person⁴ which is intended to take place on College premises and/or in a manner which may disrupt College activities, including occupying or setting up camp on College premises, organisers should refer to the College's guidelines on protests, demonstrations and similar gatherings (Annex B).

³ Protest includes any demonstration, protest, rally or similar event

⁴ 'Person' means any natural person, corporate or unincorporated body

ANNEX B: GUIDELINES ON PROTESTS, DEMONSTRATIONS AND SIMILAR GATHERINGS IN COLLEGE

This Annex is issued under Section 5 (Conduct) of the College's Code of Practice on Freedom of Speech.

Open, free, and robust discussion is vital to our academic community. However, this culture thrives only when all participants engage critically but courteously with one another. Harassment or victimisation in any form is not tolerated by the College. We expect all members of the College community, along with visitors and contractors, to treat each other with respect, courtesy, and consideration.

The University is dedicated to fostering an inclusive culture that values diversity and promotes equality. We have a responsibility to ensure a safe, welcoming, and effective environment for all students, staff, and visitors.

In this context, the College recognises that students or other College members may wish to stage or take part in protests on College grounds, and we wish to support all members of our community to respectfully share, debate and challenge views and positions on a wide range of issues. This falls within the College's procedures for meetings and events. We are committed to protecting freedom of speech and freedom of assembly within the law, and our priority is to ensure that any protests, demonstrations or other gatherings are carried out in a safe way, respectful of the diversity of our community in line with our [Code of Conduct](#). Therefore, in order to inform the College of a planned protest or demonstration, please complete this form: <https://forms.office.com/e/9B97Af7Ywi>.

Context

At Antony's College is first and foremost an academic environment and home for the c. 250 students who live on site. Teaching and learning as well as exams and pre-booked events must take priority and must not be disrupted by anyone who wishes to protest. These guidelines seek to provide a fair balance between the rights of all parties.

The plan by any person⁵ of a protest, demonstration, rally, or similar gathering or event, on College property must be communicated in advance to the College just as is the case for any other event. However, in this case, the notice period is shorter and is at least 48 hours. This is desirable both for safety of protesters and welfare of other members of the College community. Please be assured that we will seek to support you in your freedom to protest peacefully, in the context of ensuring we create a safe and respectful environment for you and for the wider College community. Collegiate University members involved in protests are required to identify themselves to College and/or University officials upon request. Failure to comply constitutes a breach of [Statute XI](#), which all Collegiate University members, including students with a study contract at Oxford, are obliged to follow.

For any questions or informal and confidential discussions, please email: dean@sant.ox.ac.uk.

⁵ 'Person' means any natural person, corporate or unincorporated body.

For demonstrations and protests on University (not College) grounds, please read the [University of Oxford Guidance on Demonstrations or Protests](#) and [Inclusive student life | University of Oxford](#).

Guidelines for protests in College

The guidelines below are designed to make it clear what is acceptable and unacceptable conduct when protesting peacefully and lawfully in College. The list is not exhaustive and will help us all to ensure freedom of speech and freedom of protest in line with the College's Code of Conduct and relevant policies.

DO	DON'T
Remember that we all have a right to freedom of expression and freedom of assembly and that the right to exchange information, debate ideas and express opinions is a core aspect of our individual freedom and our collective good.	Deny others' freedom to assemble, express opinions or beliefs different to your own.
Follow the College's booking processes for protests and demonstrations by completing this form: https://forms.office.com/e/9B97Af7Ywi	Fail to follow the booking process, or seek to subvert booking systems to prevent attendees from obtaining a place at any event.
Consider the needs and safety of others in the community, and engage respectfully with students, staff and College members, remembering at all times to comply with the College's Code of Conduct.	Intimidate, harass or disrespect others, either in person or on social media/online.
Follow instructions given by College staff, identify yourself when asked to do so and in rare cases by any other officials eg paramedics, security etc who may be required to attend.	Disrupt any event on College premises eg preventing speakers from talking or from being heard (eg by making noise to drown out a speaker), or taking action aimed at preventing an event commencing or continuing. Cause any damage to College property (including flyposting, using paint, stickering or affixing other items to College property), or environment (including smoke canisters). Block access ways, buildings and staircases.
Clearly communicate information about the protest, including by handing out leaflets, or using signs avoiding disrespectful, harassing or intimidating language targeted at individuals.	Use abusive, threatening language via communications, placards, banners, posters, chants or other means.

College Policies

All relevant College policies can be found here:

[Code of Conduct](#)

[Code of Student Discipline](#)

[Policy & Procedure on Harassment](#)

[Complaints Policy & Procedure](#)

[Equality Policy](#)

What if I choose not to follow the protest guidelines?

Students and others who choose not to follow the guidelines in this document and the College's Code of Conduct which supports lawful, safe, peaceful protest, will be referred to the College Dean under the Student Code of Conduct or the Sub-Warden as applicable. Where St Antony's students or members invite third-party groups or individuals to join a protest on College premises, those College students or members will be responsible for ensuring compliance by external groups for individuals. Any allegations of a criminal offence committed by any College member or others may be reported to the police.