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GBS External Speaker and Events Policy

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Related policies
<ul style="list-style-type: none"> ▪ GBS Data Protection Policy ▪ GBS Equality and Diversity Policy ▪ GBS Anti-Harassment and Anti-Bullying Policy ▪ GBS Student Disciplinary Policy and Procedure ▪ GBS Staff Disciplinary Policy ▪ GBS Freedom of Speech Code of Practice ▪ GBS Health and Safety Policy ▪ GBS CCTV Policy and Procedure ▪ GBS Safeguarding (Prevent Duty) Policy
External Reference
<ol style="list-style-type: none"> 1. Information Commissioner’s Office, Accessed online at: https://ico.org.uk/ 2. UK Public General Acts, <i>Data Protection Act 2018</i>, Accessed online at: https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted 3. UK Public General Acts, <i>Terrorism Act 2000</i>, Accessed online at: https://www.legislation.gov.uk/ukpga/2000/11/contents 4. UK Public General Acts, <i>Counter-Terrorism and Security Act 2015</i>, Accessed online at: https://www.legislation.gov.uk/ukpga/2015/6/section/26 5. GOV.UK Statutory Guidance, <i>Prevent duty guidance</i>, Accessed online at: https://www.gov.uk/government/publications/prevent-duty-guidance

6. UK Public General Acts, *The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000*, Accessed online at: <https://www.legislation.gov.uk/uksi/2000/2699/contents/made>
7. GOV.UK, *Proscribed terrorist groups or organisations*, Accessed online at: <https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2/proscribed-terrorist-groups-or-organisations-accessible-version>

Contents

1. Policy Statement..... 5

2. Purpose 5

3. Legislation..... 6

4. Scope..... 7

5. Responsibilities 7

6. Equality and Diversity 8

7. Procedure for Booking External Speakers..... 8

8. Approval Procedure for External Speaker Requests 8

9. Suitability of Speakers 10

10. The Referral Process..... 10

11. Complaints Procedure 11

12. Monitoring and Review 11

13. Data Protection and Confidentiality 11

14. Alternative Format 12

APPENDIX A- External Speaker Approval Form..... 13

APPENDIX B- External Speaker Referral Form 16

Global Banking School External Speaker and Events Policy

1. Policy Statement

- 1.1. Global Banking School (GBS) welcomes many visitors to various events throughout the year. Many of these events have external speakers attending. It is GBS responsibility to make sure that everyone attending an event feels safe. GBS strongly supports the view that external speakers can bring additional viewpoints and knowledge and such insights can enrich the staff and student experience. GBS is happy for external speakers to generate discussion and debate as long as such speeches do not run contrary to existing laws or impinge on the rights and safety of members of the wider GBS community.

- 1.2. External speakers allow members of GBS to experience and challenge different ideas, beliefs, and opinions and this is highly valued by GBS. GBS will take reasonable steps to ensure that freedom of speech within the law is protected for its staff and students and their visiting guest speakers. As such GBS expects all its staff and students to protect expression of opinions within the law. GBS will give adequate opportunities to counter views in a reasoned manner for members of GBS who find speakers views repugnant or distasteful. However, whilst the law provides protection for freedom of speech, this does not enable or entitle speakers to break existing legislation or provide a risk or challenge to public safety

- 1.3. Safety and welfare are fundamental to GBS policy and practices and freedom to express views may be tempered by the need to secure freedom from harm for staff, students, and visitors. GBS acknowledges that regarding external speakers there is a conflict between the laws regarding freedom of speech and those which restrict it. The responsibility rests with GBS for creating the balance between ensuring freedom of speech and academic freedoms are protected against the need to minimise the possibility of extremism or unlawful conduct happening on its campuses.

2. Purpose

- 2.1 The purpose of this policy is to provide a policy and procedure for external speakers and events held on the premises of GBS to ensure compliance with GBS Safeguarding (Prevent Duty) Policy and the Government's Counter Terrorism and Security Act 2015.

2.2 The GBS External Speaker and Events Policy should be read in conjunction with the GBS Safeguarding Policy and GBS Freedom of Speech Code of Practice which is available on the GBS Life Platform.

3. Legislation

3.1 This policy is written with reference to the Counter-Terrorism and Security Act 2015, and to the formal guidance issued from the UK Home Office related to the Prevent Duty, September 2015 (referred to as the 'formal guidance' throughout this policy). The Act places a duty on higher education institutions to have 'due regard to the need to prevent people from being drawn into terrorism.' The Act also notes that higher education institutions must seek to balance this duty with their commitment to freedom of speech and the importance of academic freedom.

3.2 Freedom of expression and speech are basic human rights that are protected by law. 'Academic freedom' is a term used to describe the law that allows for open and honest debate in an academic context. GBS has wide ranging and varied obligations under the law and all external speakers should be made aware of the following:

- GBS will not tolerate breaches of Criminal Law including, but not restricted to, incitement to terrorist activity, hate crimes, harassment, and breaches of the peace. Organisers should also make sure that any event does not breach legislation concerning assemblies, marches, and public meetings.
- GBS will protect rights guaranteed by law concerning individual rights to Freedom of Speech and Equality but will not allow freedom of speech to be used to harm individual private rights.
- Private Rights- People have private rights which entitle them to protection from harassment, bullying, threats, defamation and other breaches of their human rights. Attendees are covered by the requirements of the Data Protection legislation and their privacy rights will be protected by GBS.
- GBS is covered by the terms of the Equality Act 2010 in our role as an education provider and employer. As such, GBS will prevent the unlawful discrimination against students, employees and other individuals attending any event. Therefore,

segregation of attendees by gender or other personal characteristic is forbidden at all events held within GBS' campuses or supported as a GBS event.

3.3 The only possible exception to the rule on segregation is events that are for the purpose of collective religious worship, and these will need to be agreed in advance via the referral process. The above is not an exclusive list, and other rights and legislation may apply.

3.4 Ideas and opinions presented by external speakers should be open to academic debate and attendees should have opportunities for any counter views to be expressed, and for the speaker to be challenged in an open and restrained manner Any event should follow the GBS policy and guidance relating to Health and Safety.

4. Scope

4.1 The GBS External Speakers and Events Policy and associated procedures applies to all GBS campuses in London, Birmingham, Manchester, and Leeds. This policy applies regardless of who is organising external speakers or events, why they are being organised and what the expected outcome may be.

4.2 This policy should be read in conjunction with GBS Safeguarding (Prevent Duty) Policy and applies to:

- All full-time, part-time, and temporary staff employed by, or working for or on behalf of GBS
- All students studying at GBS
- Contractors and consultants working for GBS
- All other individuals or groups, including visitors, who have been granted access to GBS prayer room facilities.
- All speakers and events that are organised outside of the normal curriculum related activities.

5. Responsibilities

5.1 Responsibility for ensuring Prevent Duty lies with GBS Accountable Officer.

5.2 It is the responsibility of all GBS staff to be aware of the GBS External Speaker and Events Policy and associated documents. Staff will be provided with training and regular briefings.

All staff should be familiar with GBS procedures and protocols for the External Speakers approval.

6. Equality and Diversity

6.1 The Equality Act 2010 provides protection against discrimination, harassment, and victimisation on the grounds of disability and other protected characteristics. It is a legal duty for higher education institutions to anticipate needs and make reasonable adjustments so that disabled students are not placed at a substantial disadvantage compared to students who are not disabled.

7. Procedure for Booking External Speakers

7.1 Anyone organising an event that will involve an external speaker or focus on external contributors must follow the 'approval procedure for external speaker requests' except for speakers who are invited to give lectures which form part of an approved curriculum. Staff who are intending to invite speakers from professional bodies or industry may seek guidance from the Academic Standards and Quality Office (ASQO). Any member of staff inviting an external speaker is responsible for this decision and should be mindful of the External Speakers and Events Policy and Prevent Duty guidance.

7.2 Speakers taking part in a GBS hosted or operated event or activity, on campus or off campus, must act in accordance with this Policy. It is the responsibility of the event organiser to ensure that external speakers are informed of their responsibilities.

8. Approval Procedure for External Speaker Requests

Most external speaker requests will be unproblematic and can be considered and approved by the Prevent and Safeguarding Lead at each of GBS campuses. *(Please refer to Appendix A- GBS Form for Seeking Approval for an External Speaker and/or Event)*. The External Speaker Approval Form must be completed and return to the relevant Campus Prevent and Safeguarding Officer for it to be considered and approved.

Prior to approval of an external speaker by the GBS authorised member of staff, the event organiser is responsible for assessing the external speaker(s) against the following criteria:

- i. Has the speaker(s) been previously prevented from speaking at any of GBS campuses or other institutions because of their views or previously known to express views that are in breach of existing UK legislation or GBS policies?
- ii. Does the proposed title or theme of the event present a potential risk that views and/or opinions expressed by speakers may be in breach of UK legislation or GBS policies?
- iii. Is the proposed speaker and/or theme likely to attract attendance from individuals or groups that have previously been known to express views that may be in breach of UK legislation or GBS policies?

8.1 If the answer to 8.1 i. to iii. are **NO** then:

- i. The event organiser in consultation with the relevant Campus Prevent and Safeguarding Officer can confirm the external speaker and arrange for them to speak at the activity or event. The organiser must ensure that the speaker(s) have been given a copy of GBS External Speaker and Events Policy and Freedom of Speech Code of Conduct and should be told of their obligations to abide by the law and GBS policies and procedures.
- ii. Speakers must not incite hatred, violence or call for breaking of the law.
- iii. Speakers are not permitted to encourage, glorify, or promote acts of terrorism, including individuals, groups or organisations that support such acts.
- iv. Speakers must not spread hatred and intolerance in the community and thus aid in disrupting social and community harmony.
- v. Speakers must act and behave within a framework of positive debate and challenge and seek to avoid insulting other faiths or groups.
- vi. Speakers are not permitted to raise or gather funds for any external organisation or cause without the express permission of the GBS Campus Prevent and Safeguarding Officer.

8.2 Where answers to 8.2 i.– vi. are unclear the following guidance is offered:

- i. The event organiser must seek guidance from the designated Quality Manager (QM) for Prevent from the Academic Standards and Quality Office, who will have further responsibility to review the speaker(s) against the questions given in 8.1 i. – ii. above. In the absence of the QM, it should be referred to the institution's Prevent Lead.

8.3 If the answer to one or more of the questions in 8.1 i. – iii above is **YES**, then:

- ii. The event organiser must submit a referral form to GBS Campus Prevent and Safeguarding Officer. Referral must follow the procedure given in below.

9. Suitability of Speakers

9.1 To avoid any doubt as to suitability of speakers, the following list of proscriptions, which are not exhaustive, will be applied:

- Any person and/or group linked to the UK Government list of proscribed terror organisations.¹
- Talks by organisations generally considered to be extremist.
- Any speaker who is known to have spoken previously at another institution on a topic that has caused fear or intimidation of students or staff.
- Any speaker accepted in mainstream reporting lines as being highly controversial.
- Any links to any person or group that has been connected with any controversy of a negative or positive nature.
- A speaker who has a significant profile and attracts a following that could create crowd control and health and safety issues.
- Speakers from a political party during an election purdah.

10. The Referral Process

10.1 Complete all sections of the GBS External Speaker Policy Referral Form (see Appendix B). Submit the completed form to GBS Campus Prevent and Safeguarding Officer.

10.2 GBS reserves the right to prevent an external speaker from speaking at or attending an event, to refuse to permit an event and/or to halt an event at any time if it reasonably considers there may be a breach of the GBS External Speaker and Events Policy.

10.3 In the event of a referral, one of the following decisions will be made with the approval of GBS Institution Prevent Lead in consultation with the Chief Executive Officer:

- To permit the event and speaker(s) to go ahead as planned and approved.
- To not permit the event with the external speaker(s) to go ahead.
- To not permit the external speaker(s) to attend the event if the event involves more than just the speaker(s) in question.

¹ Please see <https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2/proscribed-terrorist-groups-or-organisations-accessible-version>

- To permit the event with the external speaker(s) to go ahead based on regulatory steps designed to reduce risk. These may include observation, independent video recording, and the opportunity to debate or challenge the views held and communicated.
- To make a direct referral to the Channel initiative in the local constabulary.

11. Complaints Procedure

11.1 In the event that an individual makes an allegation of breach of this External Speaker and Events Policy, the individual has the right to make a formal complaint using GBS Complaints Policy and Procedure. As guidance, possible complaints that require investigation include the following:

- 1) Where a GSB student or member of staff is prevented from arranging, speaking, or attending an event involving an external speaker.
- 2) Infringement of freedom of speech
- 3) Allegations that an external speaker(s) has breached the terms of GBS External Speaker and Events Policy or has otherwise acted in a manner contrary to UK legislation or GBS policies.

12. Monitoring and Review

12.1 This policy may be amended by GBS at any time and will be reviewed annually to ensure it is fit for purpose. Any revisions will be reported to the Academic Board for approval and noted by GBS Executive Board. Any issues related to the monitoring and review of this policy, please contact asqo@globalbanking.ac.uk.

13. Data Protection and Confidentiality

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

13.2 GBS recognises that all matters relating to safeguarding will only be shared with individuals who need to be made aware of the situation to appropriately discharge GBS' responsibilities and duty of care. All GBS staff must be aware that they have a

responsibility to immediately disclose information which, if not shared, may compromise a student's safety or welfare. All GBS staff will be fully supported by the GBS Prevent/Safeguarding Officer.

14. Alternative Format

14.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact:

- **Name:** Welfare Management Team
- **Position:** Welfare Officer/Manager
- **Email:** welfare@globalbanking.ac.uk

APPENDIX A- External Speaker Approval Form

This form should be completed by the person organising an event involving an external speaker(s) either at any of GBS campuses (London, Birmingham, Leeds or Manchester) or externally in the name of GBS. Once completed, the event organiser should submit the form to the GBS Campus Prevent and Safeguarding Officer for approval. The event and associated external speaker(s) can only take place once the GBS Campus Prevent and Safeguarding Officer has given approval by completing, signing, and dating Part 4 of this form.

Please note that approval for part time teachers of guest speakers delivering some aspect of the curriculum of an approved higher education programme of studies at any of GBS campuses is not required. If in doubt, please consult with your GBS Campus Prevent and Safeguarding Officer. If not available, please contact another GBS Campus Prevent and Safeguarding Officer.

Part 1. Event Organiser Details
Name of the Event Organiser:
GBS Campus:
Role at GBS of Member of Staff:
Contact details - email and mobile phone number:

Part 2: Event and External Speaker Details
Title of the proposed event:
Date of the proposed event:
Location of the proposed event (GBS campus) or external location:
Description of the proposed event and its format (maximum 50words):
<p>Target audience</p> <p><i>(i) Please provide details of the event profile, expected number of attendees and any other relevant information</i></p> <p><i>(ii) Please indicate and give details if you think the event might attract any groups or individuals that have previously been known to express views that may be in breach of GBS External Speaker and Events Policy.</i></p>
<p>Proposed external speaker(s)</p> <p><i>(i) For each external speaker please provide a summary of biographical information.</i></p> <p>Speaker 1:</p>

Speaker 2:

(ii) If you believe that any of your speakers have previously been prevented from taking part in an event at GBS or an event/activity at another higher education provider or similar organisation (public or private sector) or have a track record of inappropriate or illegal activity please provide further details, as appropriate.

Speaker 1:

Speaker 2:

Data Protection Statement

Under the Counter-Terrorism and Security Act 2015 Global Banking School has a legal obligation to know about what events involving external speakers are being held on & off campus – events should be risk assessed and if required the school should put steps in place to ensure the safety of students, staff and wider school community who may attend such events. The school (as Data Controller) is collecting the data gathered through this electronic form in order to meet its legal obligation; the data is retained for up to one year following the conclusion of the event; it is only used for the purpose stated above.

Declaration

I declare that:

(i) I have read and understood the expectation and requirements outlined in the Freedom of Speech Code of Practice and GBS External Speaker and Events Policy.

(ii) I have not been prevented from taking part in an event at GBS or an event/activity at another higher education provider or similar organisation (public or private sector) or have a track record of inappropriate or illegal activity please provide further details, as appropriate.

Name: Signed: Date:

Part 3: Assessment of the proposed external speaker(s)/event

Has the speaker(s) been previously prevented from speaking at any of GBS campuses or other institutions because of their views or previously known to express views that are in breach of existing UK legislation or GBS policies?

Yes/No*

Does the proposed title or theme of the event present a potential risk that views and/or opinions expressed by speakers may be in breach of UK legislation or GBS policies?

Yes/No*

Is the proposed speaker and/or theme likely to attract attendance from individuals or groups that have previously been known to express views that may be in breach of UK legislation or GBS policies?

Yes/No*

Do you have any other concerns about the proposed speaker(s) and/or event?

Yes/No*

If you have answered yes to the above, please provide further details.

**Part 4: Approval
(To be completed by GBS Campus Prevent and Safeguarding Officer**)**

Name of the GBS Campus Prevent and Safeguarding Officer:

Campus location:
Date received the request for an external speaker/event from the Event Organiser:
<p>Risk Rating</p> <p>Low <input type="checkbox"/> Medium <input type="checkbox"/> High <input type="checkbox"/></p>
Comments about the proposed speakers/event:
<p>Approval/Non-Approval for the proposed event</p> <p><i>I the above named GBS Campus Prevent and Safeguarding Officer</i></p> <p>approve/do not approve*</p> <p><i>the proposed event detailed in this GBS External Speaker Approval Form</i></p> <p>Signed:</p> <p>Date:</p>

* Delete as appropriate

** The GBS Campus Prevent, and Safeguarding Officer must retain and copy of the signed External Speaker Approval Form and give the original signed version to the event organiser.

APPENDIX B- External Speaker Referral Form

Before completing this form, the person wishing to make a referral should read the GBS Safeguarding (Prevent Duty) Policy and the GBS External Speaker and Events Policy. Making a referral of an external speaker(s) is a serious matter and these policies must be read to help ensure the person wishing to make the referral believes he or she is correct in taking this action.

Please complete Parts 1 and 2 of this form. Once you have completed and signed this form, please submit it to the GBS Campus Safeguarding and Prevent Officer.

This GBS External Speaker Referral Form is to be completed by a member of staff or student when if the answer to one or more to the questions given below, taken from the GBS External Speaker and Events Policy, is given an answer of Yes or there are any other concerns not covered by these three questions. The three questions from the Policy are given below.

- i. Has the speaker(s) been previously prevented from speaking at any of GBS campuses or other institution because of their views or previously known to express views that are in breach of existing UK legislation or GBS policies?
- ii. Does the proposed title or theme of the event present a potential risk that views and/or opinions expressed by speakers may be in breach of UK legislation or GBS policies?
- iii. Is the proposed speaker and/or theme likely to attract attendance from individuals or groups that have previously been known to express views that may be in breach of UK legislation or GBS policies?

Part 1. Event Organiser Details
Name of the Event Organiser:
GBS Campus:
Role at GBS of Member of Staff:
Contact details - email and mobile phone number:
Part 2: Event and External Speaker Details
Title of the proposed event:
Date of the proposed event:
Location of the proposed event (GBS campus) or external location:
Description of the proposed event and its format (maximum 50 words):
<p>Target audience</p> <p>(i) Please provide details of the event profile, expected number of attendees and any other relevant information</p> <p>(ii) Please indicate and give details if you think the event might attract any groups or individuals that have previously been known to express views that may be in breach of GBS External Speaker and Events Policy.</p>
<p>Proposed external speaker(s)</p> <p>(i) For each external speaker please provide a summary of biographical information.</p> <p>Speaker 1:</p>

Speaker 2:

(ii) If you believe that any of your speakers have previously been prevented from taking part in an event at GBS or an event/activity at another higher education provider or similar organisation (public or private sector) or have a track record of inappropriate or illegal activity please provide further details, as appropriate.

Speaker 1:

Speaker 2:

Part 3: Assessment of the proposed external speaker(s)/event

Has the speaker(s) been previously prevented from speaking at any of GBS campuses or other institutions because of their views or previously known to express views that are in breach of existing UK legislation or GBS policies?

Yes/No*

Does the proposed title or theme of the event present a potential risk that views and/or opinions expressed by speakers may be in breach of UK legislation or GBS policies?

Yes/No*

Is the proposed speaker and/or theme likely to attract attendance from individuals or groups that have previously been known to express views that may be in breach of UK legislation or GBS policies?

Yes/No*

Do you have any other concerns about the proposed speaker(s) and/or event?

Yes/No*

If you have answered yes to the above, please provide further details.

Part 4: Approval by GBS Campus Prevent and Safeguarding Officer**

Name of the GBS Campus Prevent Officer:

Campus location:

Date received the request for an external speaker/event from the Event Organiser:

Comments about the proposed speakers/event:

Approval/Non-Approval for the proposed event

I the above named GBS Campus Prevent and Safeguarding Officer

approve/do not approve*

the proposed event detailed in this GBS External Speaker Approval Form

Signed:

Date:

* Delete as appropriate

*** The GBS Campus Prevent, and Safeguarding Officer must retain and copy of the signed External Speaker Approval Form and give the original signed version to the event organiser.*