

FREEDOM OF SPEECH AND ACADEMIC FREEDOM CODE OF PRACTICE

Background and Purpose

1. Richmond American University London (“the University”) recognises that academic freedom and freedom of speech are at the heart of the pursuit of knowledge and are fundamental to enabling students to think critically, engage with perspectives different from their own, and challenge assumptions within the law.
2. The founding principle of the University is “Unity in Diversity” and remains central to Richmond’s mission to educate and inform future generations by providing them with the knowledge and support to think critically, the freedom to challenge assumptions, and the skills to work with others.
3. The University is committed to protecting and promoting freedom of speech and academic freedom within the law. The University recognises that higher education and scholarly inquiry may involve engagement with ideas, perspectives, and forms of expression that are diverse, controversial, challenging, or unpopular. In fulfilling its responsibilities, the University will seek to ensure that any restrictions on lawful speech are lawful, proportionate, and carefully justified.
4. To support an environment in which all members of the University community are able to express themselves, challenge others, and be challenged themselves, the University encourages staff, students, visitors, and contractors to uphold the following principles¹:
 - 4.1 Constructive Debate: To use a civil and constructive tone in all debates.
 - 4.2 Integrity: To act with honesty, compassion, and integrity.
 - 4.3 Respect: To behave respectfully toward everyone, including those with whom they disagree.

Scope

5. This Code applies to faculty, staff, students, visiting speakers, and visitors participating in University activities or using University facilities. The principles set out in this Code apply across teaching, research, student activities, external speaker events, Students’ Union activities, and relevant online activity connected to University life. It also applies to all members of the Board of Trustees and any commercial and educational partnerships the University may enter from time to time.

¹ Adapted from the Civility Pledge developed by the Jo Cox Foundation: <https://www.iocoxfoundation.org/our-work/respectful-politics/civility-pledge/>

Definitions

6. **Freedom of Speech** means everyone has the right to express lawful views, opinions, and ideas freely, in speech or writing, without unjustified interference.
7. **Academic Freedom** means protecting the intellectual independence of academics² to question and test received wisdom, and to put forward new ideas and controversial or unpopular ideas, without placing them in danger of losing their jobs or otherwise being adversely affected in their career progression or academic standing.

Legal Framework

8. This Code of Practice is issued pursuant to section 43 of the Education (No. 2) Act 1986 and the Higher Education and Research Act 2017, as amended by the Higher Education (Freedom of Speech) Act 2023. The Code takes into account the Office for Students' Regulatory Advice 24: Guidance related to freedom of speech, published on 1 August 2025. It is also mindful of the requirements of the Middle States Commission on Higher Education and the expectations of US law.

Code of Practice

9. The University will take reasonably practicable steps to protect freedom of speech and academic freedom within the law.
10. The University will not deny individuals or groups access to its premises or activities solely on the basis of their lawful beliefs, views, policies, or objectives, unless restriction is lawful, proportionate, and justified.
11. Academic staff have the freedom within the law to question, and test received wisdom, and to develop and advance new ideas and controversial or unpopular opinions without fear of adverse consequences relating to employment, academic standing, or career progression. This applies across activities relating to academic life, including teaching, research, scholarship, clubs and societies, and relevant online activity.
12. The University maintains processes and procedures to support and protect these rights, including those relating to research ethics, external speakers, safeguarding, harassment, and student and staff conduct.
13. University policies and procedures should be read and applied in a manner that is consistent with the protection of lawful freedom of speech and academic freedom within the law.

² We will review whether to include students in a revised version of this document once guidance from the Office for Students is clearer on academic freedom as it applies to students.

Research, Teaching and Academic Activity

14. The University recognises the importance of intellectual autonomy and academic freedom in teaching, research, and scholarship.
15. The Research Ethics Committee assesses research applications with regard to ethical research practice, participant welfare, safeguarding, health and safety, data protection, and relevant legal and regulatory obligations, including the Prevent Duty.
16. The Research Ethics Committee does not assess or approve applications on the basis of a student's or faculty member's guiding theory, perspective, philosophy, hypothesis, or potential research conclusions, provided the proposed activity is lawful and compliant with relevant ethical and regulatory requirements.
17. Applications may be referred back or declined where research proposals do not comply with applicable legal, ethical, safeguarding, or health and safety requirements. Members of the Ethics Committee are required to uphold the principles of freedom of speech, academic freedom, and intellectual autonomy in the consideration of research applications.

Harassment

18. The University is committed to maintaining a safe, respectful, and inclusive environment for students, staff, and visitors.
19. The University takes seriously the protection of staff and students from harassment, discrimination, abuse, sexual misconduct, violence, and other unlawful conduct. The [University's Harassment and Sexual Misconduct Statement](#) and related procedures provide further information and support for students and staff.
20. Nothing in this Code prevents the University from taking lawful and proportionate action in relation to harassment, safeguarding concerns, threats of violence, discrimination, or other unlawful conduct.
21. The University recognises that lawful disagreement, criticism, debate, or the expression of controversial or unpopular opinions do not in themselves constitute unlawful conduct or harassment.
22. The University has also committed not to use Non-Disclosure Agreements (NDAs) in responding to complaints of harassment or sexual misconduct.

External Speakers and Events

23. The University welcomes external speakers and events as part of the intellectual and cultural life of the institution, including events organised by the University's Research Centres, the Students' Union, and affiliated clubs and societies.

24. The University maintains procedures relating to external speakers and events in order to fulfil its legal obligations, including those relating to freedom of speech, safeguarding, health and safety, and the Prevent Duty.
25. External speakers may be required to comply with the University's External Speakers Procedure and associated event processes. Where concerns are identified in relation to a proposed event, the University will seek, where reasonably practicable, to manage and mitigate risks proportionately before considering restriction or cancellation.
26. The University Board and Board of Trustees receive annual assurance relating to the Prevent Duty Risk Assessment, Action Plan, and associated Prevent data returns.

Complaints and Appeals

27. Concerns relating to freedom of speech or academic freedom may be raised through the University's relevant complaints, appeals, conduct, grievance, or other applicable procedures, as appropriate.
28. Students should refer to the University's Student Complaints and Appeals procedures, while staff should refer to the relevant University policies and procedures applicable to their role.
29. Concerns related to Trustees, partners, commercial activities, or any other matters not covered by internal complaints procedures should be taken to the Office of the President or the Office of the Provost in the first instance. They will be treated in strict confidence and with no detriment to the complainant and in accordance with the relevant whistleblowing policies and procedures.
30. The University will seek to ensure that concerns relating to freedom of speech and academic freedom are considered fairly, proportionately, and in accordance with applicable University procedures.

VERSION MANAGEMENT

Responsible Department: President's Office			
Approving Body: University Board (on recommendation of Operations Committee)			
Version no.	Key Changes	Date of Approval	Date of Effect
1.0	Draft to UB for comment	20 October 2023	20 October 2023
2.0	Final Version to UB for approval – review due in one year	March 2024	December 2024
2.1	Updated to include Student Union–invited external speakers. Formatted and reapproved for 2025-26 AY	24 July 2025	September 2025
3.0	Updated to align with current freedom of speech legislation and OfS guidance; expanded scope, governance arrangements, and complaints provisions.	2 June 2026	September 2026
		Restricted Access? <i>Tick as appropriate:</i> Yes ☐ No ☒	