

ACADEMIC FREEDOM AND FREEDOM OF SPEECH POLICY

European School of Economics (London) – with centres in London, Milan, Madrid, Florence and Rome

Approved by Governing Body: June 2025

Next scheduled review: May 1, 2026

Responsible officer: Lavinia Lucchesini

Contact email: qualityassurance@eselondon.ac.uk

This Policy reflects amendments to the Higher Education and Research Act 2017 (HERA) made by the Higher Education (Freedom of Speech) Act 2023 (effective 1 August 2025), and in accordance with OfS Regulatory Advice 24 Published June 19th 2025, alongside relevant Equality Act and Human Rights Act considerations namely Article 10 of the European Convention on Human Rights.

1. Introduction

Academic freedom and freedom of speech are foundational yet often contested concepts in higher education. While their definitions may vary and lack universal agreement, they are essential to the mission of universities and the intellectual autonomy of scholars - particularly within the UK context. At the European School of Economics, these freedoms resonate with our educational philosophy, which champions the pursuit of truth, independent thinking, and the courage to challenge conventional ideas. We believe that genuine learning flourishes in an open environment where individuals are encouraged to search for and express their own uniqueness and empowered to express diverse viewpoints, provided they do so within the boundaries set by the law. These rights exist within a broader democratic framework - one that affirms liberty of thought, freedom of worship, equality before the law, and the dignity of every human being, regardless of race, gender, or identity. In this way, ESE's commitment to academic freedom reflects our deeper vision of cultivating responsible, self-aware global citizens capable of leading with integrity and vision.

ESE recognises the oversight function of the Office for Students under the Higher Education (Freedom of Speech) Act 2023, including its authority to investigate complaints and assess



institutional compliance. Until a specific procedure is published by the OfS for managing freedom of speech complaints, such matters remain under the remit of the individual School centre then, if unresolved with the Office of the Independent Adjudicator (OIA), of which ESE is a member.

Staff, students or other stakeholders bound by agreement with the School must uphold this policy together with the conditions of their relationship to the School whether an enrolment agreement or contract of employment and references to this policy and its contingency for the duration of their formal relationship is specifically mentioned in their agreements.

Observance of the principles of this policy is a condition for their ongoing relationship and violation of the principles could mean dismissal.

Visitors attending organised ESE functions on School premises will receive a <u>Freedom of Speech Statement</u> referencing this document. Visiting speakers will be notified of this Policy and be required to fill out a <u>questionnaire</u> and ensure their compliance prior to arrival.

Academic freedom

Within the UK higher education framework, academic freedom encompasses key values such as freedom from political or governmental interference, institutional autonomy, and the right to engage in peer review and robust intellectual critique. At the European School of Economics, these principles are closely aligned with our educational philosophy, which encourages independent thought, personal growth, and the fearless pursuit of knowledge. ESE encourages above all introspection and healthy self-criticism. We also believe that meaningful learning thrives in environments where academic staff are empowered to explore, question, and challenge existing ideas including those that may be controversial or unpopular without fear of institutional censure or professional repercussions, provided their actions remain within the bounds of the law.

The principle of "within the law" is central to the definition of academic freedom in the UK. It establishes that this freedom, while fundamental, is not absolute. Its scope is determined by civil and criminal legislation, meaning that unlawful behaviour, such as hate speech, harassment, or incitement to violence, falls outside the protection of academic freedom.



These limitations are legal in nature and not subject to institutional discretion. The statutory right to academic freedom applies to academic staff, whereas students and visiting speakers are instead protected under freedom of speech legislation. While students and guests are protected under the institution's commitment to freedom of speech, they do not have a legal right to academic freedom under UK law.

Freedom of speech

One of ESE's primary educational objectives is to encourage students to discover and express original thoughts and ideas. Freedom of speech is a broader concept than academic freedom, extending beyond the rights of academic staff to encompass all individuals. It is generally understood as the right to express one's views without undue censorship or interference. However, this right is not unlimited; in all democratic societies, freedom of speech is subject to lawful restrictions, particularly where it may conflict with other fundamental rights such as protection from harm, discrimination, or incitement to violence.

Article 10 of the European Convention on Human Rights states that the exercise of the Freedom of Speech .." carries with it duties and responsibilities and may be subject to formalities, condition, restrictions and penalties in the interest of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary."

At ESE, both within the walls of the institution and without, where those boundaries are extended by way of the movement of its representatives, those same will be expected to act according to the rules of conduct herein established.

Within higher education, freedom of speech holds particular significance and is explicitly protected under UK law. At the European School of Economics, we are committed to safeguarding and actively promoting both freedom of speech and academic freedom, as long as they are exercised within the boundaries of the law. This policy reflects our



compliance with legal duties set out in the Education (No. 2) Act 1986, the Higher Education and Research Act 2017 ("HERA") and other legal requirements for free speech protection at English HEPs, and their implications in practice. Amendments to HERA introduced by the Higher Education (Freedom of Speech) Act 2023 (HEFSA) came into effect on 1 August 2025, strengthening protections to ensure that staff, students, and invited speakers can engage safely in open and intellectually diverse dialogue across all areas of academic and campus life. Where these principles are violated by students or employees, penalties will be imposed on a case by case basis according to the severity of the violation and within the limits of the governing legislation. Visitors, having been informed of the code before their arrival, may simply be asked to leave or could be removed from the premises.

At the European School of Economics, the protection of freedom of speech is viewed not merely as a legal requirement, but as a core moral principle, one that safeguards the creative expression and uniqueness of the individual. It reflects our belief that education must empower students and staff to think independently, speak authentically, and contribute boldly to a global dialogue rooted in innovation, and self-realisation. Students are encouraged to voice their opinions even if they may be controversial, unpopular or express vehement disagreement.

2. Scope of the Policy

This policy applies to all individuals within the ESE community; students, academic and professional staff, contractors, and visitors. It covers all activities taking place on ESE premises, at events organised or endorsed by the School, and in any situation where ESE is connected to the expression or communication of its members.

3. Principles of Freedom of Speech

 ESE is legally obligated to take all reasonably practicable steps to uphold freedom of speech within the limits of the law for its community members and invited speakers whether on or, under specific circumstances, off its premises.



- In alignment with its educational philosophy, ESE not only safeguards freedom of speech but actively fosters open academic dialogue, welcoming diverse – even opposing – perspectives as vital to intellectual growth and critical inquiry.
- Every member of the ESE community has the right to express their views, including
 those that may be controversial or unpopular, as long as they do not violate legal
 boundaries such as those related to hate speech, defamation, incitement, or
 harassment.
- Access to ESE premises, resources, or platforms will not be denied to any individual
 or group based on their views or beliefs, unless there is a substantiated legal concern
 or where they may present a security threat.
- ESE remains committed to protecting and promoting academic freedom, ensuring that academic staff and researchers can explore, debate, and communicate ideas freely, without censorship or fear of institutional consequence.

4. Limitations on Freedom of Speech

"The legal right to freedom of speech is not absolute. It does not protect unlawful speech, such as statements that are threatening, abusive, or amount to harassment or incitement to violence." Of S Guidance: Freedom of Speech Duties for Higher Education Providers, 2024. Individuals Freedom of Speech is limited according to the following rules:

- Freedom of speech is not absolute. Reflecting both UK law and OfS guidance, ESE
 does not permit speech that violates existing laws (e.g. criminal law, hate speech,
 harassment, incitement to violence, data protection breaches).
- Lawful Restrictions: violence, terrorism, hate speech, defamation, data protection breaches, and public order are recognised exceptions to protected free speech under UK law.

5. External Speakers and Events

 All external speakers participating in ESE-hosted events are required to adhere to this policy as well as all applicable legal obligations by completing <u>this form</u>.



- ESE will evaluate any potential risks associated with external speakers and, where
 necessary, apply proportionate measures, such as enhanced security arrangements
 or adjustments to the event format or location. However, speech will not be restricted
 merely on the basis of controversy or disagreement with the views being expressed.
- Event organisers are responsible for following established ESE procedures when inviting external speakers and must provide adequate notice to allow for any necessary risk assessments to be carried out in a timely manner.

6. Investigating Complaints and Breaches

- Alleged breaches of this policy will be addressed through ESE's formal <u>Complaints-Procedure.docx</u>, ensuring consistency with internal processes and external regulatory expectations.
- Investigations will adhere to the principles of natural justice, ensuring they are fair, transparent, and impartial.
- Any individual affected by decisions relating to restrictions on freedom of speech will be informed of the outcome and provided with a clear explanation of the reasons behind it.
- An appeals process will be available to those wishing to challenge decisions regarding speech restrictions, denied access, or cancelled events.

7. Balancing Freedom of Speech and Community Welfare

- ESE acknowledges that freedom of speech can sometimes intersect with the sensitivities or well-being of individuals or groups. In such cases, the School will seek to uphold both rights, exercising sound judgement and proportionality.
- Appropriate support services will be available for individuals who may feel affected by contentious or challenging discussions.
- When conflicts emerge, ESE will favour constructive dialogue and engagement over restriction, ensuring responses are guided by a commitment to openness and inclusion.



Code of Practice for Ensuring Freedom of Speech

1. Introduction

This Policy sets out the School's approach to securing freedom of speech within the law for its staff, students, members, and visiting speakers ("Participants"), and to meeting its duties under HERA (as amended by the Higher Education (Freedom of Speech) Act 2023) and associated OfS regulatory requirements.

It constitutes the School's Code of Practice on Freedom of Speech ("FS Code") for the purposes of HERA Section A2 and should be read with related policies (e.g., Student Disciplinary Regulations; Staff Conduct; Events & External Speakers; Complaints & Appeals; Dignity & Respect; Health & Safety; Security; Data Protection).

The School is an English Higher Education Provider (HEP) seeking registration with the Office for Students (OfS). Compliance with this Policy forms part of the School's Conditions of Registration, in particular E1 (Academic freedom and freedom of speech) and E2 (Adequate and effective governance).

2. Principles and commitment

- 2.1 The School affirms the foundational importance of freedom of speech and academic freedom. Within the law, participants are free to question and test received wisdom and to advance new, controversial, or unpopular ideas without fear of adverse consequences.
- 2.2 The School will take the steps that, having particular regard to the importance of freedom of speech, are reasonably practicable to secure freedom of speech for Participants and visiting speakers (the "Secure Duty").
- 2.3 Institutional neutrality: the School will not adopt institutional positions on contested political or social questions in ways that disadvantage lawful viewpoints.
- 2.4 Peaceful protest is protected. Protest must not shut down debate or unreasonably interfere with others' freedom of speech or create a hostile or intimidating environment.
- 2.5 Decisions will be impartial, evidence-based, recorded, and no more restrictive than



necessary to run events safely and within the law. Cancellation or postponement is exceptional and undesirable.

2.6: Even-handedness. Where mitigations or conditions are imposed for one side of a contested issue but not the other, the School will document and be able to justify the difference with evidence, applying the least-restrictive measures necessary.

3. Scope

- 3.1 This Policy applies to all School-related meetings, events, teaching, seminars, tutorials, staff meetings, conferences, and student-led activities ("Meetings/Events"), whether on School premises, online, at associated premises, or elsewhere where activities relate to the School or involve Participants.
- 3.2 Overseas centres (Milan, Madrid, Florence, Rome): This Policy applies to School activities and Participants at those centres, subject also to host-country law. Where local law imposes additional constraints, the School will comply with local requirements while taking all reasonably practicable steps to secure lawful free speech.

4. Legal and regulatory framework

- HERA Sections A1–A4 (as amended, in force from 1 August 2025): Secure Duty; FS
 Code; duties regarding use of premises, terms of use, and security costs (exceptional
 circumstances only).
- OfS Guidance: Regulatory Advice 24 Guidance relating to freedom of speech.
- Equality Act 2010: protection against discrimination/harassment, including for protected philosophical beliefs ("Protected Viewpoints") where applicable.
- Human Rights Act 1998 / ECHR Articles 9 and 10: freedom of thought and expression; positive obligations to foster an environment for robust debate.
- Conditions of Registration E1 and E2 (and awareness of E6 from 1 August 2025 relating to harassment and sexual misconduct).

Note: This Policy is a practical framework, not legal advice. The School will keep it under review as law and guidance evolve. The School's annual notice will specifically draw attention to HERA Section A1 (Secure Duty) and Section A2 (FS Code) alongside links to this Policy.



5. Definitions

- Participants: staff, members, students of the School, and registered student society officers.
- Visiting speaker: any non-Participant invited to speak or take part in a Meeting/Event (including future invitees).
- Reasonably practicable: capable of being done with the School's actual resources and constraints, judged objectively.

6. Values and conduct expectations

- 6.1 Everyone has the right to free speech within the law. Exposure to a wide range of lawful views, including those some may find offensive or disturbing, is an essential part of higher education.
- 6.2 Prohibition on obstruction (intent rule). Participants must not engage in conduct intended to prevent, hinder, or unduly burden lawful meetings and events (including by misrepresentation, intimidation, threats, or orchestrated disruption):

No participant may, without reasonable excuse, take any action intended to:

- a) prevent or hinder a Meeting/Event from happening at School or associated premises (including SUs, constituent/partner institutions, or School-related external venues); or
- b) render the Meeting/Event impossible or impracticable to hold, or materially more difficult or expensive to organise or publicise, because of the intended subject-matter or the statements, beliefs, or opinions of those organising or participating. For these purposes, claimed ignorance of this Policy/FS Code is not a reasonable excuse. Actions with the prohibited effect will be treated as intended unless another convincing explanation is provided.
- 6.3 Peaceful protest is permitted where it does not impede entry, drown out proceedings, or otherwise shut down the event. Time, place, and manner restrictions may be applied proportionately.
- 6.4 Harassment, discrimination, or bullying (including pile-ons) is prohibited.
- 6.5 Respect for the rights of others includes complying with lawful directions of appointed Event Chairs, Security, and School officials.



6.6 Cost consequences for misconduct. Where a Participant's misconduct (proven under School procedures) directly causes additional and otherwise avoidable security or venue costs, the School may seek to recover reasonable costs from that Participant in accordance with law and School regulations.

7. Use of School premises and terms

- 7.1 The School will not deny use of premises, nor set terms of use, on the grounds of a person's or body's lawful ideas, beliefs, or views.
- 7.2 Security costs: Save in exceptional circumstances, the School will not require organisers to bear security costs relating to their use of premises. Where exceptional circumstances are relied on, reasons will be recorded and the least-onerous effective measures adopted.
- 7.3 Advertising of subject. Organisers should publicise the headline subject and nature of an event sufficiently to allow attendees to choose whether to attend. This must not be used to require prior provision or approval of speech content or to impose viewpoint-based framing.

8. FS Code – Procedures for organising Meetings/Events

A. General

- 8.1 Starting point: Events go ahead; cancellation is exceptional. Processes are simple, timely, and overseen by an identified contact point.
- 8.2 Who this applies to: All School staff and students; associated and recognised societies; School-hosted external hirers.

B. Notification & approval

- 8.3 Standard Events (no identified risk); risk prompts auto-checklist; confirmation issued and Freedom of Speech Statement is included on material related to the event. If places are reserved and confirmations are sent this will also include the Freedom of Speech Statement.
- 8.4 Potentially contentious or higher-risk events (e.g., likely high attendance; subject matter attracting organised protest; high media profile; safeguarding or public order issues):
 - Submit brief event description at least 10 working days in advance (shorter timelines
 accepted where reasonably practicable) including names of speakers, topics and
 intended audience in order to also assess any possible conflicts and security risks



- Student Services Officer (SSO) conducts proportionate review focused on enabling the event with appropriate mitigations.
- Where necessary, consult Security, Health & Safety, Safeguarding, and Legal (as appropriate).
- Senior decision: Only a designated senior officer (e.g., Campus Manager or their nominee) may decide on postponement/cancellation.
- Early identification of controversial events. The Student Services Officer (SSO) will
 maintain a light-touch triage to identify potentially controversial events in advance
 (from submitted forms or room-booking flags) and will engage organisers early to
 design mitigations that enable the event.

C. Mitigations (minimum necessary)

Will be decided by the Campus manager or event organiser based on information gathered by the SSO and, in light of current events, based on regulations governing movement of the public in controlled spaces.

8.5 Examples: adjusted venue/time; controlled entry; stewarding; agreed time, place, and manner restrictions for protest; appointment of a neutral Chair to mediate debates and discussions only where necessary to ensure orderly conduct. Mediators may interrupt speakers at any event where the principles of Freedom of Speech are being violated.

8.6 Not normally permitted: prior clearance of speech content; mandatory "trigger warnings"; onerous information demands; excessive security beyond demonstrable need.

Even-handedness record. Where mitigations are imposed, the SSO's decision record will note how comparable events with differing viewpoints were treated and why any differences were necessary

D. Security & costs

8.7 Security measures must be proportionate and cost-efficient. Decisions on security and any exceptional cost allocation will be made by Campus Manager or Event Manager and be written and reasoned.

Cost recovery from disruptors. Security cost allocations will not be placed on organisers save in exceptional circumstances. Where unlawful disruption or breach of this Policy is



established, the School may seek reasonable cost recovery from responsible individuals under 6.6.

E. Internal meetings (teaching, seminars, staff meetings)

8.8 Routine internal Meetings normally proceed without formal review. Organisers will consider whether contested topics or other factors may reasonably trigger disruption or free-speech risks and, if so, alert the Campus Manager for proportionate mitigations.

F. Last-minute challenges

8.9 The School will treat late objections with caution, warn against bad-faith disruption, and take all reasonably practicable steps to allow the Event to proceed.

G. Overseas centres

8.10 Local Centre Leads will apply this Policy consistently with host-country law, escalating promptly where local constraints arise. The School will still seek practicable alternatives (venue/time/mode) to enable lawful speech.

9. Protests and demonstrations

Contingencies. The SSO will maintain template communications (e.g., warning letters) and a rapid escalation route to Security/venue management to address late challenges while enabling the Event to proceed wherever reasonably practicable.

- 9.1 Protest is permitted subject to conditions necessary to protect safety and the rights of others to speak and to hear.
- 9.2 Prohibited behaviours include: blocking access/egress; physically intimidating attendees; sustained noise designed to drown out proceedings; forced entry; or disruption inside events after warning.
- 9.3 The School may relocate protests (time/place/manner) where needed to keep Events audible and safe, while not prohibiting the protest itself.

10. Students' union and constituent/partner institutions

10.1 Where a visiting organisation operates on School-owned or controlled premises, compliance with this Policy and the FS Code is a condition of occupation/use.



10.2 SS officers and society organisers who are Participants are subject to this Policy even when acting within School premises or platforms in matters relating to the School or other Participants.

10.3 Schools/constituent institutions and partner centres are expected to maintain compatible rules and enforcement; the School may intervene (within its powers) where they fail to secure free speech or where external actions threaten School-related Events.

10.4 Avoiding duplication with colleges/partners. The School will agree coordination arrangements so that constituent/partner institutions take the lead on meetings on their premises, while the School retains powers to intervene (within its authority) where necessary to secure free speech, including where external actions (e.g., online pile-ons or disruptive

10.5 The Campus Manager of Event Organiser will share this policy with any prospective guests along with this form for visiting speakers requesting their compliance.

10.6 The visiting speakers will agree to the following terms and conditions:

protests) threaten events inside those premises.

"The presentation must be appropriate to the age and maturity level of the student cohort. The presentation must not incite hatred, violence or call for the breaking of the law. The visiting speaker is not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups and organisations that support such acts. The visiting speaker must not spread hatred and intolerance of any group/s in the community. The visiting speaker must seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge. Visiting speakers are not permitted to raise or gather funds for any external organisation or cause without express permission from the Campus Manager. Compliance with the School's Equal Opportunities and Safeguarding Policies is required. School staff have the right and responsibility to interrupt and/or stop the presentation for any violation of this agreement."

11. Decision-making and records

- 11.1 The Campus manager will maintain written records for any decision to: refuse, postpone, or cancel an event; impose mitigations or exceptional security costs; or take actions that materially burden the organisation.
- 11.2 Records will state the factors considered, evidence relied on, and reasons including why lesser measures were insufficient.



12. Equality, dignity, and Protected Viewpoints

- 12.1 The School will avoid unlawful discrimination or harassment, including against those holding Protected Viewpoints (e.g., gender-critical, anti-Zionist, or viewpoints contesting aspects of critical race theory, where covered by the Equality Act).
- 12.2 Misuse of approval or disciplinary processes to disadvantage lawful viewpoints may itself constitute discrimination/harassment and will be treated as a serious disciplinary matter.
- 12.3 The prohibition on harassment applies to staff, students, and guests in School-related contexts, including online pile-ons linked to School Events.

13. Enforcement and discipline

- 13.1 The School will secure compliance with this FS Code, including disciplinary action where appropriate.
- 13.2 Examples of misconduct: intentional obstruction or shut-down of lawful events; making or acting on knowingly false or exaggerated claims to engineer cancellation; threats; doxxing; incitement to violence; harassment. knowingly making, or acting on, materially false or exaggerated claims of risk with the effect of engineering cancellation or disproportionate mitigation.
- 13.3 Sanctions (student or staff) range from warnings to suspension or dismissal, per the relevant procedures. External visitors may be removed and barred from future events.

14. "No-platform" lists and "safe spaces"

- 14.1 The School does not operate general "no-platform" lists except where legally required (e.g., proscribed terrorist organisations or where law otherwise prohibits).
- 14.2 Any "safe space" initiatives must not restrict lawful speech or imply official disapproval of lawful viewpoints. They must be appropriately limited (time/place/scope) and equality-law compliant.

15. Training, communication, and publication



- 15.1 The School will bring this Policy and the HERA duties to the attention of all students and staff at least annually and provide it to all new students during matriculation/induction. This will be done by highlighting:
- (i) HERA Section A1 Secure Duty;
- (ii) this Policy/FS Code and where to find it
- (iii) how to organise events and the School's starting-point presumption that events go ahead;
- (iv) the protest rules and misconduct consequences.
- 15.2 Targeted training will be provided to approvers/organisers, security, student services officers, Campus Managers and Chairs.
- 15.3 The Policy, procedures, and forms will be published in accessible formats on the School website and intranet; revisions will be promptly posted and signposted.
- 15.4 HEPI format good practice. The School will: (a) maintain version and review metadata on the cover page; (b) provide accessible formats (e.g., large print/audio); (c) include process flowcharts and linked forms online; and (d) keep a dissemination log for governance review.

16. Data protection and safeguarding

- 16.1 Processing of personal data in Event administration will follow UK GDPR/DPA 2018 (or applicable EU GDPR at overseas centres), using the least intrusive means compatible with safety and legal duties.
- 16.2 Safeguarding duties (including Prevent, where applicable) will be discharged in a manner consistent with this Policy and the Secure Duty.

17. Complaints and appeals

- 17.1 Participants may complain about decisions or conduct under the School Complaints Procedure.
- 17.2 Appeals against Event decisions (mitigations, postponement, cancellation, security cost allocations) may be made within 5 working days to the designated senior officer not involved in the original decision, who will review promptly with a presumption in favour of the Event proceeding where safe and lawful.



18. Monitoring, assurance, and review

- 18.1 The Governing Body receives an annual report on freedom of speech, including: number and type of Events; mitigations applied; protests and outcomes; complaints and appeals; training delivered; and actions taken to improve processes.
- 18.2 This Policy will be reviewed at least annually and sooner if required by changes in law or OfS guidance.

Appendix A - Practical rules for conduct at/around Meetings

- A1. Do not obstruct access/egress, overwhelm capacity controls, or create noise intended to drown out proceedings.
- A2. Follow directions of the Chair/Stewards; speak in turn; no intimidation or personal abuse.
- A3. Media and recording only as permitted by the organiser/venue rules and applicable law.
- A4. Breach may lead to removal and disciplinary action.
- A5 Protest must follow **time/place/manner** directions where needed to ensure the Event remains audible and safe; relocation may be required. Failure to comply may lead to removal/discipline.

Appendix B – Event process (summary flow)

Post-Event note (if issues).

Book/Notify → 2) Auto-checklist (flags if higher-risk) Auto-checklist & early triage by
 DO → organiser engagement to co-design mitigations. → 3) DO review (aim: enable)
 → 4) Mitigations (minimum necessary) → 5) Decision and record → 6) Run Event → 7)

Appendix C – Exceptional security costs criteria (illustrative)

- Credible, evidence-based, specific risk that cannot reasonably be mitigated by lesser steps;
- Costs are significant and grossly disproportionate in relation to benefits/alternatives;



- Transparent attempt to minimise cost; written reasons provided; even-handed across viewpoints.
- Where misconduct is proven under this Policy, the School may pursue post-event recovery of additional security costs from the responsible party, rather than placing costs on organisers.

Appendix D – Contacts

- Designated Officer (Events & Free Speech): Student Services Officer
- Security Lead: Elias Vilota
- Overseas Centre Leads (Milan/Madrid/Florence/Rome): Campus Managers
- Complaints & Appeals: Complaints should be made to Campus Managers when Designated Officers are unable to resolve issues. Unresolved cases should be reported to the OIA of which ESE is a member.
- Policy & Legal: qualityassurance@eselondon.ac.uk

Important notice

This Policy summarises complex legal duties and will be updated as the law and OfS guidance evolve (the latest revisions take into account the OfS guidance published in June 2025). It may become out of date; always consult the latest published version on the School website. For legal advice on specific cases, seek independent counsel.

The European School of Economics is a member of the OIA. Should you not obtain satisfaction for any complaints you may have which the school fails to resolve please contact the OIA directly through their website at http://oiahe.org.uk

ESE will monitor and record data related to speech-related complaints and interventions to assess the effectiveness of its commitment to free expression, while maintaining a respectful and inclusive academic environment