Freedom of Speech Policy

Version	2.1
Effective date	On approval
Date for review	November 2027
Policy owner	Chief Executive
Reference points	Higher Education (Freedom of Speech) Act 2023 as applicable; OfS Regulatory Advice 24 updated August 2026; current BIMM policy and complaints scheme; NHAM legal and partner responsibilities.
Audience/handling notes	Academic, Students, Staff, External, Public, Visiting Speakers
Dissemination and implementation plan	This Freedom of Speech Policy, with its guidelines is intended to set out how NHAM complies with legislation, It is an externally facing public statement. This policy sits at Governance level, implemented and overseen by the Governance Committee. Staff will receive training on this guidance and students will receive this guidance on academic integrity and correct referencing conventions in their Student Handbook. Staff and Students will also be directed to where it is published externally. The Chief Executive will be responsible for the dissemination and implementation of this policy.
Linked Policies, Procedures and Forms	Student Handbook, Events Booking Policy, Staff Handbook, Induction, Staff Training
Date approved	Pending approval

1 INTRODUCTION

The Notting Hill Academy of Music (NHAM) is committed to upholding the principles of freedom of speech and academic freedom, in accordance with the Higher Education (Freedom of Speech) Act 2023 and BIMM University's institutional policy. NHAM operates as an alternative provider whose programmes are validated by BIMM. The partnership and applicable law determine the responsibilities of each institution.

2 PURPOSE

This policy applies to all NHAM staff, students, visiting speakers, and contractors. Its purpose is to promote a dynamic and inclusive academic environment where ideas are debated openly and respectfully, while ensuring compliance with UK law and BIMM policy.

NHAM, in partnership with BIMM, commits to:

- Enabling staff, students, and visitors to express ideas, including controversial or unpopular ones, provided they are within the law.
- Ensuring rigorous academic debate and inquiry that challenges existing knowledge and fosters learning.
- Distinguishing clearly between lawful free expression and speech that violates UK law, such as defamation, harassment, incitement to violence, or hate speech.
- Maintaining a culture of inclusivity and mutual respect, drawing from the higher governance role BIMM plays in securing these freedoms

3 RESPONSIBILITIES

NHAM performs the following roles:

- Reinforces BIMM's Freedom of Speech Policy and procedures locally.

- Assess speaker events under NHAM's events procedure, giving particular regard to lawful speech.
- Signpost the applicable NHAM, BIMM and external complaints routes.

Academic Staff and Event Organisers must:

- Promote a culture of open dialogue and rigorous discussion.
- Be aware of the boundaries of lawful expression and ensure that all campus activity complies with relevant legislation and NHAM/BIMM policy.
- Escalate any concerns about potential violations of the policy to the Chief Executive or Academy Manager.

Students are entitled to:

- Engage freely in academic discourse without fear of censorship or ungrounded censorship—or "no-platforming."
- Seek support through NHAM or BIMM if they experience or witness any attempts to stifle lawful expression.

4 COMPLAINTS AND POLICY ACCESS

Raise concerns through NHAM's published complaints route. NHAM will explain when BIMM can review the matter and provide the applicable route in writing. Students can take an eligible complaint to the Office of the Independent Adjudicator after completing the applicable internal procedures.

The OfS free speech complaints scheme opened on 1 September 2026 for eligible staff, visiting speakers and others within its rules. Check eligibility and internal procedure requirements on the OfS website.

The NHAM policy and the applicable BIMM policy and complaints scheme are available from NHAM's public policy page.

5 Lawful expression and practical decisions

NHAM protects lawful expression, including ideas that are unpopular, offensive or disputed. Expectations of courteous discussion must not become a condition that suppresses otherwise lawful speech. Apply conduct and harassment rules in a way consistent with the law and the applicable BIMM framework.

Before limiting an event, teaching, publication or online access, establish the expression involved, the relevant legal duties and the actual evidence of risk. Consider reasonably practicable steps that allow the activity to proceed. Record reasons, mitigations, decision-maker and any review route. Seek advice where lawfulness or proportionality is uncertain.

The event organiser submits information on the speaker, topic, date, audience, venue and practical needs to the Academy Manager normally ten working days in advance. Consider late requests fairly. Assess specific risks without assuming a viewpoint or identity creates risk. A senior unconflicted officer approves proportionate conditions. Give written reasons for refusal and offer prompt review before the event where possible.

Conditions may include a suitable venue, chair, access arrangements or safety measures where justified. Handle protest safely while enabling lawful speakers and audiences to participate. Apply funding and security decisions consistently and consider the resources reasonably available.

6 Complaints training and publication

Students raise concerns through NHAM Student Complaints and any applicable BIMM review, with an eligible OIA route after completion. The separate OfS free speech scheme covers eligible non-student complainants within its rules from 1 September 2026. A policy reference does not extend the scheme to a person or institution outside its scope.

Publish the NHAM code, events procedure, internal complaints contacts and external signposting. Identify NHAM's own legal and registration status and the contractual BIMM responsibilities accurately before approval. Do not assume validation alone makes NHAM a constituent institution or gives every applicant access to a student complaints scheme.

Train staff involved in admissions, teaching, events, complaints, IT and conduct decisions. Review this policy alongside Prevent, harassment, disciplinary and IT rules. The Governance Committee monitors cancelled or restricted events and complaints and records any corrective action.