



4. Events and Speakers Policy

PURPOSE:

The purpose of this document is to set out the Policy position of CNELM and associated procedures in relation to requesting and approving Events and Speakers.

CNELM aims in all of its decisions to create a safe and vibrant student experience that is diverse and academically robust, especially when tackling controversial subjects or where views expressed are at the extreme end of a continuum of beliefs, opinions, research, scientific endeavour, popular culture or when challenging current paradigms.

Safeguarding the student experience is paramount as well as safeguarding all people in the context of preventing a risk of radicalisation and/or indoctrination.

Please note that there are no planned events onsite at CNELM. Opportunities for onsite events will be reviewed in the spring of 2022.

SCOPE:

1. This Policy relates to all users and Stakeholders at CNELM.
2. Events include Conferences and Workshops organised by CNELM solely, or in collaboration with others, as part of the Academic Calendar, and delivered at our business premises; and Events organised by and branded by CNELM either solely, or in collaboration with others at alternative venues.
3. Events include those organised where participants attend a physical location or are exclusively online or a combination of both.
4. Events also include other people/parties who hire our premises to hold Events, or Clinic Sessions, regardless of whether or not the hirer was charged a fee to hire rooms.
5. Speakers include those people invited to contribute at Events as Speakers/Presenters, including those contributing to degree modules as 'Contributing Lecturers.
6. Programmes include any course delivered by CNELM solely or in collaboration with others, including but not exclusively confined to the Degree Programmes validated by Middlesex University (MU).
7. Historically CNELM has never facilitated Events organised by the Student Body. However, this does not mean we would not consider such a request and approve it in the future.
8. Students at CNELM on validated degree programmes are Distance Learning students and do not ordinarily attend the Centre. Many such students live at some distance from the Centre, or live overseas. Extracurricular Events may be offered to students on Distance Learning Programmes who are able to attend the Centre.
9. NS3UK Ltd/CNELM was previously classed as a Relevant Higher Education Body (RHEB) Alternate Provider (AP) within the provisions of the Counter Terrorism and Security Act 2015 and consequently classed as a '**specified authority**' and now no longer applies. However, NS3UK Ltd/CNELM continues to operate within the principles of the Prevent Duty i.e. to demonstrate '**due regard to the need to prevent people from being radicalised and drawn into terrorism for example**'.
10. The Proprietor of NS3UK Ltd/CNELM is the Managing Director - Kate Neil and is the person that would lead any concerns related to concerns related to extremism and/or terrorism. The Centre Administrator, Dave Lee is the next named contact person in respect of managing such concerns. CNELM draws upon the advice of the CNELM **Business & Education Ethics Committee (BEEC)** to inform decisions.
11. CNELM is a wholly-controlled, not-for-profit subsidiary of NS3UK Ltd and provides educational services to NS3UK Ltd under a License Agreement. Within our organisation this means the Proprietor has the ultimate authority in the approval of Events, Speakers, Contributing Lecturers and the hiring of our venue. In the Proprietor's absence decisions requiring an immediate response will in the first instance fall to the Business Director a co-Director of NS3UK Ltd. Otherwise this responsibility will default to the Principal or Director of IT who are Directors for CNELM and Shareholders of NS3UK Ltd.

POSITION STATEMENT:

1. CNELM is an educational establishment that focuses on the activities of providing nutrition and lifestyle education, and nutritional therapy practice. Fundamental to this focus across the degree programmes and the nutritional therapy practice diploma course is the ability for students to develop and demonstrate robust critical thinking skills. This process starts early in student studies with a dedicated module called 'Thinking Critically' which is a Level 4 module for undergraduate students, and made available at the outset to postgraduate students as a refresher. Research Mindedness, Critical Evaluation and Personal Reflection are key components of the validated degree programmes we teach, and the CNELM Nutritional Therapy Practice Diploma and Personalised Nutrition Practice Diploma programmes.
2. The field of nutrition and lifestyle is broad, complex, often conflicting, and with substantial contradictory data. Within this field there is strong opinion and ideas in relation to health, animal rights, farming methods, agricultural policy, food politics, specific dietary approaches, the 'food industry' and environmental protection. CNELM supports only the use of democratic processes that bring about change.
3. The majority of Speakers on the Degree Programmes and the CNELM PNP/NTPD are PAYE and Flexible Fee Contract Staff. Contributing and Guest Lecturers on these programmes are mostly well-known to CNELM, and have contributed over many years. New Contributing or Guest lecturers are usually identified via 'word-of-mouth' as reputable speakers recommended by the wider nutrition and lifestyle industry. Speakers advocating personal beliefs in the above context are overall assessed as a low risk.
4. Existing guest speakers and contributing lecturers will be deemed compliant with this policy. New Contributing Lecturers will be provided with a Terms of Agreement and a copy of this Policy. The Terms of Agreement specifically requires the Contributing Lecturer to abide by this Policy. The current Contributing Lecturers and Guest Speakers will be provided with a copy of the updated Terms of Agreement.
5. CNELM will only support advocates who exclusively promote the use of democratic processes, including peaceful protest, to both raise public awareness and bring about change.
6. Our focus is the activity of education and the encouragement of our students to critically enquire, reflect, research and discover – including into areas where there is either controversy, little public consensus or evidence. Where a lecture, event or presentation includes areas of controversy or where there are known strong, diverse and potentially extreme opinions as detailed in point 2 above, then CNELM will ensure by way of mitigation that a counter-opinion/voice is also heard either at the Event in case of a Conference or Extracurricular Event, or across the curriculum in the context of module and programme delivery.

GUIDING PRINCIPLES:

1. CNELM recognises that no Institution is without risk and with this in mind CNELM will employ a risk assessment based approach to determining the approval of Events and Speakers.
2. Risk Assessments will be conducted using the Matrix of Risk and Consequence – see Appendix 1. The Risk Assessment will further consider any management plan and/or mitigating condition that reduces risk and/or consequence in order for an Event or Speaker to be approved.
3. Risk Assessments will consider a number of factors including but not limited to: the Topic, Logistics, Health and Safety. In addition the assessment will consider issues related to Equality, Academic Freedom and Freedom of Speech.
4. **Right to Refuse** - As a Private Provider CNELM Management reserves the right to refuse, without giving any reason, the use of its premises, and by extension the use of web services for any Event if not in keeping with this policy, if inconvenient, if not in keeping with our stated Mission, if impractical, potentially damaging to our reputation or prohibitive financially.
5. In relation to the degree programmes we teach, and other accredited programmes, the principle of **Academic Freedom** will be a fundamental guide. Academic Freedom as expressed in the Education Reform Act 1988 (section 202) states: 'to **ensure** that academics have freedom **within the law** to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions'. CNELM considers this protection to be

fundamental to the advancement of the evidence base, research and academic rigour of our programmes, and relates to our stated mission as an institution in respect of nutrition, health and lifestyle. In this regard it is important that 'received wisdom' can be tested and new ideas put forward within a complex, ever-changing, and competitive research and business environment.

6. **Freedom of speech** is another essential guiding principle. CNELM considers the protection of free exchange of ideas enhances the quality and rigour of debate, as stated in the Education Act 1986 (No 2 Section 43) CNELM commits to; 'take reasonably practical steps to ensure that the freedom of speech **within the law** is secured for staff, students and visitors'.
7. The Equality Act 2010 also has a bearing as a guiding principle due to the notion of a 'protected characteristic'. One of the protected characteristics is religion and belief. Other characteristics include race, gender, disability, age, sexual orientation, transgender status, marriage and civil partnership, as well as maternity/pregnancy. Therefore, CNELM will seek to ensure that a platform is not denied in a way that would directly or indirectly discriminate, nor would CNELM allow a platform for the expression of views and opinions in a way that may harass, victimise or undermine the fostering of good relations between people who share a protected characteristic, and those who do not.
8. CNELM will adopt a **no platform** approach for Events, Speakers using our facilities to express or promote **extreme** ideological, religious or political views. CNELM will not permit the use of its facilities to any group, or organisation proscribed by HM Government (see LINKS for a list of proscribed organisations).
9. Within our own democracy Freedom of Speech is seen as a right that comes with **responsibility** – that responsibility includes respect for the law and as such CNELM will not condone an abuse of such freedom that leads to, or potentially can lead to **harm** to other people. Therefore, a **no harm principle** is an important codicil to any judgement/decision in respect of permitting Events to go ahead, or for particular speakers to be given a platform.

STRUCTURES:

1. Events, Speakers and Hirers of our premises assessed as Low risk will be presented to the Managing Director (MD) for decision. Events, Speakers and hirers of our premises assessed as a higher risk will be presented at either the Senior Management Team Meeting (SMT) or the Senior Academic Team Meeting (SAT). The MD is usually present at both meetings and chairs SMT meetings. The SMT and SAT groups meet every 6-8 weeks. Each Meeting Agenda will include Events and Speakers as a standing item.
2. Both the SMT and SAT meetings have the facility to invite student representatives, members of the CNELM BEEC, and other staff as appropriate. Invited members may attend the whole meeting as part of the discursive process or just for the Agenda item considering Event, Speakers and other considerations – e.g. referrals following any reported incidents or cause for concern of external sharing of information. Invited members can attend the meeting at CNELM, or join by Conference Call.
3. All Events, hiring of premises will require approval, and the prior completion of a **Request Form**. Requests for Speakers and Contributing Lecturers will also require approval and a Request Form will need to be completed. The Request Forms will require information that will assist with both Risk Assessment and decision making.
4. Requests will initially be sent to the Centre Administrator (CA) who will complete an initial Risk Assessment including where appropriate checks and information clarifications. The CA will present to the MD any requests assessed as Low Risk, and Low Consequence for approval. The CA will confirm with the requester the outcome of the request, and where applicable will advise of any right of appeal.
5. If the Risk Assessment indicates a higher risk and/or consequence then the CA will present to the next available SMT or SAT.
6. The SMT or SAT will make a decision regarding approval. The MD is a standing member and Chair of the SMT. Consequently, any decision made by the SMT or SAT will have been formally approved by the MD. The CA will notify the requester of the decision, and advice of any right of appeal.
7. Should a decision be required sooner than the next scheduled SMT or SAT, an *ad hoc* meeting will be convened with at least 5 members of the SMT and/or the SAT present. At least one member must be a Director of CNELM and/or NS3UK Ltd. Joining a meeting by Conference Call is permissible.

8. Any Complaint or Appeal relating to approval decisions will be conducted under our **Managing Concerns** process. Ultimately, the final stage of a Complaint or Appeal internally will be via the CNELM **Business & Education Ethics Committee (BEEC)**. The BEEC can offer guidance and make recommendations in relation to Complaints and Appeals. The final decision rests with the MD. The MD must demonstrate how guidance and recommendations of the BEEC, and members of the SMT and SAT have informed the final decision.
9. If an Event, Speaker, Contributing Lecturer is approved and subsequently an issue is raised including but not limited to: bullying, harassment, discrimination, extremist ideology, incitement to violence, hate speech it will trigger a full internal review, and prior to publication of any amendments to the Policy will be presented to various Stakeholders including student representatives prior to republication of the Policy. If a criminal offence occurred or potentially occurred CNELM will immediately report the matter to the Police for investigation, and will fully cooperate with such investigation. If no criminal offence occurred or was reported then CNELM will conduct its own investigation and report back to the SMT or SAT. If it came to light that an offence took place, or potentially did, our own investigation will be suspended and the Police may be informed. The SMT will make the decision to share information following any incident externally where this is legal to do so in relation to **Data Protection**, and may consult our own solicitor, or legal representative of the BEEC for advice before doing so.
10. All Contributing Lecturers sign a **Terms of Agreement** before engagement that specifies that CNELM will share externally information of concern where legal to do so.
11. Speakers, and those who hire our venue will be required to sign a **Terms of Agreement/Hire Agreement**.
12. Speakers at Events will be subject to applicable background checks as part of the Approval Process for the Event.

DETAILED PROCEDURES:

Contributing Lecturers (CL)

1. A Module Leader or other designated staff member will:
 - discuss with a Programme Manager and Programme Leader the need for any Contributing Lecturers required to cover content on their Module.
 - identify a person who can fulfil the role and determines the CL's experience, expertise, qualifications.
 - request Form (CL Request Form) and this should be countersigned by the Programme Leader. The CL Request Form should then be sent to the Centre Administrator.
2. The Centre Administrator (CA) will conduct background checks and undertake a risk assessment using the Matrix in Appendix 1. If the Risk Assessment indicates Low Risk and Low Consequence the CA will send the Request Form to the MD for Approval.
3. The Managing Director (MD), if in agreement with the Low Risk Low Consequence assessment, will return a signed copy of the Request Form to acknowledge Approval.
4. The CA will send the Terms of Agreement to the CL for signature. The Approved form and signed Terms of Agreement will be held on file. The CA will also send the CL a copy of the Events & Speakers Policy and a copy of the College Etiquette Policy and the Centre's Managing Concerns Overarching Statement.*
5. If the CA determines risk/consequence is in a higher classification then the CA will refer to the next available SMT or SAT, or ad hoc meeting of the SMT or SAT if required. If the SMT or SAT approve the request then the CA will follow step (6), and if approval was conditional add any conditions to the Terms of Agreement.
6. If the Request was not approved the CA will inform the Module Leader and the CA or Module Leader will contact the CL to inform them of the outcome and any Appeal procedure.

*The CL will be asked to confirm within the Terms of Agreement that they have read and understood the related policies. In particular, the CL will be guided to review aspects of the policies related to managing concerns. Managing concerns is both about: the CL who may have and wish to report concerns; as well as concerns raised by students and/or staff members about the behaviour and/or quality/academic standing of a lecture//lecturer.

EVENTS AND HIRE VENUE:

1. Events including our own branded events such as Conferences (whether held at our premises or not), those we host in collaboration with others; Events held in our premises by others whereby they hire the venue; Events that are part of the Extra-Curricular activity (such as Lab Days, First-Aid and Product Days); and Events organised by staff, students, the public on a hire basis.
2. The Organiser/Proposer of an Event must complete a Request Form which is available from the CA. The Request Form must be returned to the CA in the first instance.
3. Request Forms should be sent to the CA at least 8 weeks prior to the event.
4. The Organiser/Proposer must include an outline plan of the Event – including listing any Speakers. The outline plan should set out practical arrangements such as lunch but also the style – e.g. if there will be break-out groups or workshops.
5. The CA will conduct a Risk Assessment, and if required seek further information/clarification from the Organiser/Proposer.
6. If the Risk Assessment concludes a low risk/consequence the CA will send the Request Form for Approval to the MD. If Approved the CA will inform the Organiser/Proposer and send the Terms and Conditions. Once the signed Terms and Conditions are received by the CA the Organiser/Proposer can advertise/market the Event.
7. Once approved – any changes to Speakers or itinerary must be notified to the CA – this will require the Risk Assessment to be updated. An Event may be cancelled if changes made are too late for proper scrutiny and assessment to take place, or if the changes meant the risk factor increased and there was insufficient time for the SMT or SAT to consider mitigating conditions.
8. If on initial assessment the risk classification was higher than a Low Risk/Consequence the CA will refer to the next available SMT or SAT for adjudication.
9. The SMT or SAT will consider the request and will make an Approval decision with or without conditions to mitigate risk. If the SMT or SAT approve the request the CA will inform the organiser/proposer – and send the organiser/proposer the Terms and Conditions – including any Conditions.
10. Once signed Terms and Conditions have been received by CNELM the Event can go ahead and the Organiser/Proposer can where relevant advertise/market the Event.
11. If approval is Conditional and the Organiser/Proposer does not accept the Conditions then Approval for the Event will be terminated.
12. If the Event is not approved then the CA will contact the organiser/proposer to inform them of the decision and any appeal procedure.

ROOM HIRE:

1. If a local Community Group or individual wished to hire room(s) at CNELM they must complete a Request Form.
2. Depending upon the nature of the request CNELM may require the hirer to complete the Events Request Form. If this was not appropriate a shorter Room Hire Request Form will be completed. Naturally we will only process a request where the dates/times requested could be facilitated.
3. Request Forms should be returned to the CA who will conduct a risk assessment and if this is Low Risk/Consequence the CA will forward to the MD for an Approval decision. If Approved the CA will contact the hirer and confirm details, including any conditions. The CA will send the Hirer the Terms and Conditions and the Hirer must return signed copies to the CA who will then confirm the booking
4. If the risk is assessed as higher than low risk/consequence then the CA will refer the matter to the next available SMT or SAT for adjudication. If approved, with or without conditions, the CA will contact the Hirer and send them the Terms and Conditions for signing and returning. Once returned to CNELM then the room/venue hire will be confirmed.
5. If not approved the CA will contact the Hirer to inform them of the decision and any appeal procedure.

Please note: The Terms and Conditions for both Events and Room/Venue Hire contain similar clauses related to health and safety, equality, extremism and Prevent.

Named Contact Person/s responsible for this Policy

Kate Neil Managing Director and Head of Quality Assurance kate@cnelm.co.uk

Dave Lee Centre Administrator, Data Manager and Practice Supervisor dave@cnelm.co.uk
 Dr Michelle Barrow Academic Team Director, Clinical Director and Institution Link Tutor
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 Dr James Neil Principal and Research Director james@cnelm.co.uk

ASSOCIATED POLICY LINKS AND DOCUMENTS:

This policy links to the following key CNELM policies and related documents:

- Business & Education Ethics Committee (BEEC)
- Communication Policy
- IT Facilities and Web-services Acceptable Use Policy
- Managing Concerns Overarching Statement
- Middlesex University Regulations
- Confirmation Agreement and other Interview document
- Staff Handbook
- Student Representatives Guide
- [Proscribed Organisations](#)
- www.cnelm.co.uk

FLOWCHART OF PROCEDURES:

Please see Appendix 2

APPENDIX 1:

Shortened example of the Risk Assessment Matrix:

The Decision Maker – e.g. the MD or the SMT or SAT Teams can impose conditions in order to mitigate risks. For example conditions could include the following:

1. A delegate list must be provided in advance.
2. Delegates visiting the Centre in person must produce a valid form of Photo ID.
3. Any presentation materials must be made available in advance for review and if required changes made - such as health claims, language, presentation of disputed and contested ideas.
4. The Event Speaker will be video recorded for online or virtual presentation and the recording may be peer reviewed.
5. Requirement that the Event must be chaired to ensure alternate presenters and Q&A to challenge materials/arguments presented.
6. Condition that the presenter provides suitable insurance and qualifications e.g. if presenting a cooking demonstration.

RISK ASSESSMENT MATRIX: Please note that the full Matrix will include notions of MEDIUM Risk and Consequence as well as Low/Medium and Medium/High. In the following table we colour code the sections on a traffic light system. The risks assessed will include the likelihood of extremist, discriminatory language behaviour being used that are illegal – any risk presentation could cause harm – such as radicalisation of vulnerable people leading to violent action or non-violent extremism.

	LOW RISK	HIGH RISK
LOW CONSEQUENCE	<p>LOW RISK AND LOW CONSEQUENCE Requests likely to be approved – although some conditions may be added.</p> <p>Examples: Content, arrangement low risk, speaker low risk and no reputational harm likely. For example First Aid Training, Product Day, workshop on marking and assessment, conference on topics</p>	<p>HIGH RISK AND LOW CONSEQUENCE A Plan to manage and mitigate risk/threat will be required</p> <p>Example: The content may be controversial and contested but the consequence would not put</p>

	with mainstream and accepted science.	CNELM at reputational or financial harm.
HIGH CONSEQUENCE	<p>LOW RISK BUT HIGH CONSEQUENCE</p> <p>A Plan to manage and mitigate risk/threat will be required.</p> <p>Example: The content and arrangements may be low risk but there could be reputational harm to CNELM if the content is controversial – such as health claims made for particular interventions based on contested scientific evidence.</p>	<p>HIGH RISK AND HIGH CONSEQUENCE</p> <p>Requests for Events and Speakers in this category will not be approved.</p> <p>Examples may include proscribed groups, a speaker where there is primary evidence that is attributable to known presentations/statements made that were discriminatory and/or extreme views, opinions, and beliefs.</p>

APPENDIX 2:

