University of Exeter Leaflet and Poster Policy V2

Aim

The purpose of this policy is to set out the University's requirements for the display and/or distribution of leaflets and posters on the Streatham and St Luke's Campuses.

The University is committed to the protection of academic freedom and freedom of speech within the law, alongside a duty of care to its students, staff and visitors. This freedom does not extend to promotion materials that would be in breach of the law, including those related to hate speech and counter-terrorism legislation. Material promoting extremist and illegal views or that incites extremist and illegal behaviour is explicitly prohibited.

Posters, leaflets and fliers, while recognised as a legitimate means of communication for approved projects and societies, can have a detrimental effect on the presentation of a campus and its environment.

Posters, leaflets and fliers can also cause damage to estate fabric, trees, planting and street furniture requiring repairs and maintenance and the use of funds that could be invested more effectively elsewhere.

This policy sets out the University's approach to fulfil this duty, and that the requirements of the policy are documented and transparent.

Definition

The definition of leaflets and posters for the purpose of this policy encompasses the below:

Any posters, leaflets, fliers, documents, visual displays, oral or electronic messages that are intended to be displayed and/or distributed either on-campus or at external events linked to the University.

- Promoting an event, group, institution, organisation, cause or product
- Providing further information in relation to an event, group, institution, organisation, cause or product
- Materials intended to influence the reader/viewer/listener

Scope

This policy applies to materials as described in the above definition being displayed or distributed by any person, group or organisation, whether linked to the University or not.

Out of Scope

Digital and print communications on behalf of the University are managed by Communications and Marketing Services. Prior to release of marketing material, all content will undergo an approval process to ensure it is accurate at the time of publication and compliant with current legislation. The promotion of private events held on University property (including residences) is not permitted, and is therefore not within the scope of the policy.

Related University Policies

<u>University Agreement on Academic Freedom</u>

<u>University Freedom of Speech Policy</u>

University Speakers and Events Policy

<u>University Prevent Support Referrals Policy</u>

Public Order Act 1986, Part III, Racial Hatred

Public Order Act 1986, Part 4a, intentional harassment, alarm or distress

Social Media Policy for employees

Social media guidance for staff and students

Responsibility for Implementation

Responsibility rests with the following senior managers:

Director of Compliance, Governance and Risk on behalf of the Registrar and Secretary (overall responsibility)

Acting Director of Commercial Services (for materials relating to events booked via Event Exeter) Students' Guild Events, Health and Safety Manager (for materials produced by Students' Guild affiliated Student Groups)

Directors of College Operations (for materials displayed/distributed at College booked events)
Timetabling Manager (for materials produced by student groups not affiliated to Students' union when booking events)

Operations Manager and Contracts and Residence Experience Managers (for materials displayed or distributed within residences)

Head of Facilities Operations

Director of Communications and Corporate Affairs (communication of policy to staff and students) Head of Security (removal of material in breach of policy)

Lazenby Chaplain (for materials displayed or distributed within the Multi-Faith Chaplaincy spaces) Head of Student Services (with regard to the potential invocation of the University disciplinary process)

Standard to Meet		Accountability	Reference
			Document/More
1	Approval of policy 1.1 The Leaflet and Poster Policy and associated Protocols are approved under the University consultation and approval process. 1.2 The Registrar and Secretary is responsible for ensuring that all Leaflet and Poster policy protocols and guidelines are written in accordance with the relevant regulation and legislation and are fit for purpose.	Director of Compliance, Governance and Risk	
2	Communication of policy to relevant staff 2.1 All staff responsible for implementation are aware of and able to implement the policy	Acting Director of Commercial Services Students' Guild Head of Resources and Health & Safety Timetabling Manager Operations Manager and Contracts and Residence Experience Managers (Residences) Head of Security Head of Facilities Operations INTO Head of Student Services Director of Estates and Grounds	
3	Communication of policy to students 3.1 All students are aware of the requirements with regard to the use of leaflets and posters	Director of Communications and Corporate Affairs INTO Head of Student Services	

4	Student groups material (outside of an event)	Students' Guild Head of Resources	AV Poster
7	If group is affiliated to the Students' Guild:	and Health & Safety	Approval Guidance
	4.1 Material cannot be displayed prior to the event having	,	''
	been approved via the Students' Guild events risk		
	assessment process		
	4.2 Material must not be displayed before it has been		
	approved by the Students' Guild, including stamped		Extremist Right
	approval that the content is not in breach of policy		Wing Symbols
	If a group is not affiliated to the Students' Guild:	Director of Campus Infrastructure	Guidance Note -
	4.3 Leaflets and/or posters for display/distribution must be	and Operational Support Services	this is not
	reviewed by the Forum Management Team for assurance	Head of Facilities Operations	exhaustive. Please refer any
	that it is not in breach of the policy.	Operations Manager and Contracts	unknown symbols to
	For both Affiliated and Non-Affiliated Groups:	and Residence Experience	<u>prevent@exeter.ac.uk,</u> and they will be investigated.
	4.4 Content inciting extremist and illegal behaviour is	Managers (Residences) Directors of College Operations	they will be investigated.
	explicitly prohibited and may result in the party or parties	Lazenby Chaplain	
	responsible being subject to the University disciplinary	INTO Head of Student Services	Prayer and Faith Facilities
	procedures and may also be reported to the police	invioriead of student services	Policy
	4.5 If extremist symbols or commentary is included, the		<u> </u>
	context must be carefully considered before allowing		
	materials to be used		
	4.6 Material may not be displayed promoting a commercial		
	organisation.		Estates Services Policy on
	4.7 No postering of posters, leaflets or fliers will be		posters and fliers
	permitted on campus without the written permission of		
	the Director of Estates Services or their representative.		
	4.8 Once approved, material may only be posted in		
	accordance with the Estates Services Policy on Posters and		
	Fliers.		5
5	Student Groups Material (at an event)	Head of Facilities Operations	Extremist Right
	5.1 University staff may review material that is distributed at an event, and have the right to confiscate any material	Head of Security (Estate Patrol team)	Wing Symbols Guidance Note –
	found to be in breach of policy.	Students' Guild Head of Resources	this is not
	5.2 If extremist symbols or commentary is included, the	and Health & Safety	exhaustive. Please refer any
	context must be carefully considered before allowing	Head of Student Services	unknown symbols to
	materials to be used or the event to continue.	INTO Head of Student Services	prevent@exeter.ac.uk, and
	5.3 Content inciting extremist and illegal behaviour is		they will be investigated.
	explicitly prohibited and may result in the party or parties		
	responsible being subject to the University disciplinary		
	procedures and may also be reported to the police		
	5.4 No postering of posters, leaflets or fliers will be		
	permitted on campus without the written permission of		Estates Services Policy on
	the Director of Estates Services or their representative.		posters and fliers
	5.5 Once approved, material may only be posted in		
	accordance with the Estates Services Policy on Posters and Fliers.		
6	Teaching, Research, Study and Employability Events	Directors of College operations	Extremist Right
	6.1 It is the accountability of the University member of staff booking an event to assess whether supporting	Employability Managers	Wing Symbols Guidance Note –
	materials are in breach of hate crime, counterterrorism	INTO Head of Student Services	this is not
	legislation or other legal obligations.		exhaustive. Please refer any
	6.2 If extremist symbols or commentary is included, the		unknown symbols to
	context must be carefully considered before allowing		prevent@exeter.ac.uk, and
	materials to be used		they will be investigated.
	6.3 Content inciting extremist and illegal behaviour is		,
	explicitly prohibited and may result in the party or parties		University Teaching and
	responsible being subject to the University disciplinary		Research Speakers
	procedures and may also be reported to the police		<u>Process</u>
	6.4 No postering of posters, leaflets or fliers will be		
	permitted on campus without the written permission of		
	the Director of Estates Services or their representative		
	6.5 Once approved, material may only be posted in		Estates Services Policy on
	accordance with the Estates Services Policy on Posters		posters and fliers
1	and Fliers.		

7	Commercial and/or corporate Events 7.1 It is a requirement of contract that commercial and/or corporate booking requests are accompanied by a risk assessment completed by the customer. This includes a declaration that leaflets and/or posters used will be not breach hate speech or counter terrorism legislation 7.2 University staff may review material that is distributed at an event, and have the right to confiscate any material found to be in breach of policy. 7.3 If extremist symbols or commentary is included, the context must be carefully considered before allowing materials to be used or the event to continue 7.4 Content inciting extremist and illegal behaviour is explicitly prohibited and may result in the party or parties	Acting Director of Commercial Services Head of Facilities Operations Head of Security (Estate Patrol team)	Extremist Right Wing Symbols Guidance Note — this is not exhaustive. Please refer any unknown symbols to prevent@exeter.ac.uk, and they will be investigated. University Speakers and Events Policy
8	Private Events 8.1 Leaflets and/or posters for private events should not be displayed or distributed and will be removed 8.2 If such material is identified, and extremist symbolsor commentary is included, the responsible party or parties may be subject to the University disciplinary procedures. 8.3 If such material is identified and contains content inciting extremist and illegal behaviour, the party or parties responsible may subject to the University disciplinary procedures and reported to the police	Head of Facilities Operations Head of Event Operations (Event Exeter) Head of Security (Estate Patrol team) Head of Student Services INTO Head of Student Services Director of Commercial Services	
9	Material found in breach of policy 9.1 If any staff member identifies material in breach of this policy, they must remove it and report to Head of Security, stating where it was found, and (if known) who had placed it there. 9.2 The Head of Security must provide detail of any material inbreach of the Prevent duty to prevent@exeter.ac.uk. This will be investigated, and may at this stage be referred to the Police.	All staff Head of Security (Estate Patrol team) Prevent Team	
10	Social or other Digital Media 10.1 Posts made on social or other digital media that mention the University are monitored by the Communication and Marketing team. If any posts are made in breach of policy, action may be taken to have the post deleted, and further action may also be taken where appropriate. 10.2 If a post is reported by alternative means that implicates but does not explicitly name the University, the same action may be taken as at 10.1. It should be noted that the University does not undertake to routinely or systematically monitor the posts of staff and students	Director of Communications and Corporate Affairs INTO Head of Student Services	

Document Revision History

First publication Date	October 2018 Author: Risk and Compliance Office		Risk and Compliance Officer
Key Contributors	tors All identified accountable parties		
Approved By:	PCG, PSLT and Mike Shore-Nye	Approval Date:	03 September 2018

Version	Revision Date	Modified by	Description of revision	Approved by (if appropriate)	Approval Date
2.0	24/07/19	Risk and Compliance Officer and Director of Grounds	Inclusion of Estate Services policy on posters and fliers, including approval requirements, and how and where posters and fliers may be displayed	Mike Shore-Nye PSLT Hugh McCann Sarah Snow Iain Park	22/05/2019
1.0	12/09/18	Risk and Compliance Officer	First version of policy, following consultation with all key stakeholders, University Prevent Compliance Group, and Professional Services Leadership Team (PSLT).	Mike Shore-Nye PSLT	03/09/2018