### University of Exeter Leaflet and Poster Policy V3, October 2022

#### 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 to ensure 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, recorded, streamed or other 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
- Signs posted in communal areas or windows University of Exeter accommodation

## 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. Note that the promotion of private events held on University property (including residences) is not permitted, and any such material will be removed regardless of content, as will any material promoting proscribed groups, or showing symbols linked to such groups. Note that the University is obliged to report material that is against the law to the police.

#### **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.

Note that the promotion of private events held on University property (including residences) is not permitted, and any such material will be removed regardless of content. Material promoting proscribed or illegal groups or associated activity will also be removed and reported.

**Related University Policies** 

<u>University Agreement on Academic Freedom</u>
<u>University Freedom of Speech Policy</u> <u>University Speakers and</u>
<u>Events Policy</u> <u>University Prevent Support Referrals Policy</u> <u>Public</u>

Order Act 1986, Part III, Racial Hatred

<u>Public Order Act 1986, Part 4a, intentional harassment, alarm or distress Social Media Policy for employees</u>

Social media guidance for staff and students

### **Responsibility for Implementation**

Responsibility rests with the following senior managers:

- Divisional Director of University Corporate Services (or nominated deputy) on behalf of the Registrar and Secretary (overall responsibility)
- Assistant Director Residential & Commercial Development (for materials relating to events booked via Event Exeter)
- Student Activities Manager (for materials produced by Students' Guild affiliated Student Groups)
- Directors of Faculty Operations (for materials displayed/distributed at Faculty 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
- Assistant Director, Communications and Global (communication of policy to staff and students)
- Head of Security (removal of material in breach of policy)
- Multifaith Chaplaincy Coordinator (for materials displayed or distributed within the Multi-Faith Chaplaincyspaces)
- Head of Education Support (with regard to the potential invocation of the University disciplinary process)

Standard to Meet		Accountability	Reference Documents / more information
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.	Divisional Director of University Corporate Services	
2	Communication of policy to relevantstaff  2.1 All staff responsible for implementation of this policy and those who would be required to take action in the event of an issue being identified are aware of and able to implement the policy	Assistant Director, Communications and Global Assistant Director Residential & Commercial Development Students' Guild Student Activities Manager Timetabling Manager Operations Manager and Contracts and Residence Experience Managers (Residences) Head of Security	
3	Communication of policy to students 3.1 All students are aware of the requirements with regard to the use of leaflets and posters.	Assistant Director, Communications and Global INTO Head of Student Services Head of Education Support	

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4	Student groups material (outside of an event)	Students' Guild Student	AV Poster
	If group is affiliated to the Students' Guild: 4.1 Material cannot be displayed prior to the event having been approved via the	Activities Manager	Approval Guidance
	Students' Guild events risk assessment process		
	4.2 Material must not be displayed before it has been approved by the	Executive Divisional Director	
	Students' Guild, including stamped approval that the content is not in breach of policy	of Finance, Infrastructure and Commercial Services	
	If a group is <b>not</b> affiliated to the Students' Guild:	and commercial services	
	4.3 Leaflets and/or posters for display/distribution must be reviewed by the Forum Management Team for assurance that it is not in breach of the policy.	Head of Facilities Operations Operations Manager	
	For both Affiliated and Non-Affiliated Groups:  4.4 Content inciting extremist and illegal behaviour is 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	Contracts and Residence Experience Managers (Residences)	
	police 4.5 If extremist symbols or commentary is included, the context must be	Directors of Faculty	
	carefully considered before allowing materials to be used 4.6 Material may not be displayed promoting a commercial organisation.	Operations  Multifaith Chaplaincy	
	4.7 No postering of posters, leaflets or fliers will be permitted on campus without the written permission of the Director of Commercial, Residential and Campus	Coordinator	Prayer and Faith Facilities Policy
	Services or their representative.  4.8 Once approved, material may only be posted in accordance with Estate Patrol on Posters and Fliers.	INTO Head of Student Services	Policy on posters
	See section on 11 for requirements on printing and copying materials.		and fliers (policy on where and how material can and cannot be attached to University property)
5	Student Groups Material (at an event)	Head of Facilities	
	<ul> <li>5.1 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.</li> <li>5.2 If extremist symbols or commentary is included, the context must be carefully considered before allowing materials to be used or the event to continue.</li> <li>5.3 Content inciting extremist and illegal behaviour is 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.</li> <li>5.4 No postering of posters, leaflets or fliers will be permitted on campus without the written permission of the Director of Commercial Residential and Campus Services or their representative.</li> <li>5.5 Once approved, material may only be posted in accordance with the Estate Patrol Policy on Posters and Fliers.</li> </ul>	Operations Head of Security (Estate Patrol team) Students' Guild Student Activities Manager Head of Education Support INTO Head of Student Services	Policy on posters and fliers (policy on where and how material can and cannot be attached to University property)
	See section 11 for requirements on printing and copying materials		
6	Teaching, Research, Study and Employability Events	Directors of Faculty	
3	6.1 It is the accountability of the University member of staff booking an event to assess whether supporting materials are in breach of hate crime, counter terrorism legislation or other legal obligations.  6.2 If extremist symbols or commentary is included, the context must be	operations Employability Managers INTO Head of Student	University Teaching and Research Speakers Process
	carefully considered before allowing materials to be used 6.3 Content inciting extremist and illegal behaviour is 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 6.4 No postering of posters, leaflets or fliers will be permitted on campus without the written permission of the Director of Commercial Residential and Campus Services or their representative 6.5 Once approved, material may only be posted in accordance with the Estates Services Policy on Posters	Services	Estates Services Policy on posters and fliers (policy on where and how material can and cannot be attached to University property)
7	Commercial and/or corporate Events	Director of	
	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	Commercial, Residential and Campus Services	University Speakers and Events
	<ul> <li>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.</li> <li>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</li> </ul>	Head of Event Operations (Event Exeter)	Policy
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	continue	Head of Facilities	
	7.4 Content inciting extremist and illegal behaviour is explicitly prohibited and may	Operations	
	result in the party or parties		
		Head of Security	
		(Estate Patrol team)	
8	Private Events	Head of Facilities	
	8.1 Leaflets and/or posters for private events should not be displayed or distributed	Operations	
	and will be removed	Head of Event	
	8.2 If such material is identified, and extremist symbols or commentary is included,	Head of Event	
	the responsible party or parties may be subject to the University disciplinary procedures.	Operations (Event Exeter)	
	8.3 If such material is identified and contains content inciting extremist and illegal	LXeter)	
	behaviour, the party or parties responsible may subject to the University disciplinary	Head of Security	
	procedures and reported to the police	(Estate Patrol team)	
	procedures and reported to the police	(25tate: att of team)	
		Head of Student Services	
		INTO Head of Student	
		Support	
		Director of	
		Commercial,	
		Residential and	
		Campus Services	
9	Material found in breach of policy	All staff	
	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	Head of Security	
	placed it there.	(Estate Patrol team)	
	9.2 The Head of Security must provide detail of any material in breach of the Prevent		
	duty to prevent@exeter.ac.uk. This will be investigated and may at this stage be	Prevent Team	
10	referred to the Police.	Assistant Disease	
10	Social or other Digital Media	Assistant Director,	
	10.1 Posts made on social or other digital media that mention the University	Communications and Global	
	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	Global	
	further action may also betaken where appropriate.	INTO Head of Student	
	10.2 If a post is reported by alternative means that implicates but does not explicitly	Services	
	name the University, the same action may be taken as at 10.1. It should be noted that	Services	
	the University does not undertake to routinely or systematically monitor the posts of		
	staff and students		
11	Printing and Copying of materials		
	11.1 University printers may be used to print and/or copy promotional materials, as		
	long as they are not in breach of this policy.		
	Student use of the University Print Services Facility		
	11.2 The University Print Team will ask to see an approved Guild risk assessment	University Print Team	
	before agreeing to print or copy materials for Guild associated events	, , , , , ,	
	11.3 If materials are in breach of this policy, the Print Team will not agree to proceed		
	with the activity. For clarity – processing of material promoting private events is not		
	permitted.		
	11.4 For all materials processed, the Print Team will signpost students to the relevant		
	approval pathway prior to the student being able to share the materials.		
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# **Standard Monitoring and Measurement Criteria**

Policy section	Measurement criteria		
2	Evidence of policy sharing with relevant staff to be provided by the noted accountable parties annually to the Prevent Compliance Group		
3	Evidence of policy sharing with students to be provided by the noted accountable parties annually to the Prevent Compliance Group		
4	<ul> <li>Students Guild to report annually to the Prevent Compliance Group on the number of events for which material has been approved</li> <li>Estate Patrol to report annually to the Prevent Compliance Group on the number of incidents of material being removed as in breach of policy, and the action taken as a result</li> <li>Estate Patrol to report to the Prevent Lead immediately if any material removed relates to extremist or terrorist content, and the action taken as a result</li> </ul>		
5, through to 9	<ul> <li>Estate Patrol to report to the Prevent Compliance Group annually on the number of incidents of material being confiscated at an event, and the action taken as a result</li> <li>Estate Patrol to report to the Prevent Lead immediately if any material confiscated relates to extremist or terrorist content, and the action taken as a result</li> <li>Relevant approver of content to report annually to the Prevent Compliance Group (where relevant) on any material approved that includes extremist symbols or commentary, including the rationale for approving</li> </ul>		
10	Communications Team to report to the Prevent Compliance Group annually on the number of posts made in breach of policy, and the action taken as a result		

# **Document Revision History**

First publication Date	October 2018	Author:	Risk and Compliance Officer
Key Contributors	All identified accountable parties		
Approved By:	PCG, PSLT and Mike Shore-Nye	Approval Date:	03 September 2018
Last review date	October 2022	Next review date:	October 2023

Version	Revision Date	Modified by	Description of revision	Approved by (if appropriate)	Approval Date
3	October 2022	Senior Risk and Compliance Advisor	<ul> <li>Update to roles to reflect 2022 restructure</li> <li>Section 11 added regarding printing and copying materials on University equipment</li> <li>Measurement criteria added</li> </ul>	Prevent Compliance Group	17/10/2022
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