

IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION

CLAIM NO: []

BETWEEN:

**THE CHANCELLOR, MASTERS, AND
SCHOLARS OF THE UNIVERSITY OF
CAMBRIDGE**

Claimant

and

**PERSONS UNKNOWN WHO, IN
CONNECTION WITH CAMBRIDGE FOR
PALESTINE OR OTHERWISE FOR A
PURPOSE CONNECTED WITH THE
PALESTINE-ISRAEL CONFLICT ,
WITHOUT THE CLAIMANT'S CONSENT
(I) ENTER OCCUPY OR REMAIN UPON
(II) BLOCK, PREVENT, SLOW DOWN,
OBSTRUCT OR OTHERWISE
INTERFERE WITH ACCESS TO (III)
ERECT ANY STRUCTURE (INCLUDING
TENTS) ON, THE FOLLOWING SITES
(AS SHOWN FOR IDENTIFICATION
EDGED RED ON THE ATTACHED
PLANS 1 AND 2):**

- (A) GREENWICH HOUSE,
MADINGLEY RISE, CAMBRIDGE, CB3
0TX**
- (B) SENATE HOUSE AND SENATE
HOUSE YARD, TRINITY STREET,
CAMBRIDGE, CB2 1TA**
- (C) THE OLD SCHOOLS, TRINITY
LANE, CAMBRIDGE, CB2 1TN**

Defendants

**FIRST WITNESS STATEMENT OF
EMMA MACHTELD CLARA RAMPTON**

I, **EMMA MACHTELD CLARA RAMPTON**, of The University of Cambridge, The Old Schools, Trinity Lane, Cambridge, CB2 1TN, will say as follows:

- 1 I am the Registry for the Claimant in these proceedings, which I refer to in this witness statement as "**the University**".

- 2 In my role as the Registry of the University, I am head of the Unified Administrative Service (“**UAS**”), which, amongst other things, is responsible for the operational management of university property, including advising on and responding to security matters and incidents.
- 3 Also, as Registry, I am officially secretary for several University committees, including the University Council, which is the principal executive and policy-making body of the University, and the Finance Committee, which is one of two standing committees of the Council, entrusted with responsibility for the management and stewardship of all University assets and land.
- 4 I am authorised to conduct legal proceedings on behalf of the University. Accordingly, I am authorised to make this witness statement on behalf of the University to set out certain factual matters in support of the University’s application for a precautionary injunction to prevent trespass onto and other unlawful conduct in relation to the University’s land in connection with Cambridge for Palestine or otherwise the Palestine-Israel conflict.
- 5 Where matters referred to in this witness statement are derived from my own knowledge, they are true; where they are derived from documents or from information supplied by other members and employees of the University or other parties, they are true to the best of my knowledge and belief, and where possible, I confirm the name and position of the person who is the source of my information.
- 6 This witness statement has been prepared by the University’s solicitors, Mills & Reeve LLP, following a number of email exchanges and video conferences with me and the collation of factual matters from various members of the University, with the assistance of Mills & Reeve LLP, which have then been verified by me.
- 7 There is now produced and shown to me a bundle of documents marked “ER1” to which I refer to in this witness statement. References to page numbers are to pages of “ER1”. The exhibit ER1 contains the following documents and categories of documents:

Document description	Date	Page number(s) of ER1
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Plan of Greenwich House	N/A	1
Official copy entries – Greenwich House	N/A	2-19
Plan showing red edging of The Old Schools / Senate House Site	N/A	20
Statutory declaration – The Old Schools and Senate House	3 September 2024	21-25
Plan showing the location of The Old Schools/Senate House	N/A	26
Google street images of the Senate House Yard Fence, Senate House Yard Gates, Senate House Passage Gate, and the Archway	N/A	27-29
Plan showing the location of the gates, and the Archway for The Old Schools/Senate House Site	N/A	30
Cambridgeshire Live Article	6 May 2024	31-34
Freedom News Article	17 May 2024	35-38
BBC Article	15 May 2024	39-41
BBC Article	17 May 2024	42-44
Varsity Article	27 November 2024	45-48
Cambridge for Palestine Social Media Posts	27 November 2024 – 30 November 2024	49-69
Interim non-disclosure Order	16 December 2024	70-78
BBC Article	27 November 2024	79-81

Varsity Article	29 November 2024	82-85
BBC Article	14 August 2024	86-89
University Statement	1 August 2024	90-94
University's Council Meeting Minutes	21 October 2024	95-100
Work Group – Draft Terms of Reference	October 2024	101-102
Minute 994	November 2024	103
Email from Council Secretariat	28 November 2024	104 - 105
University's statements	May 2024, August 2024, November 2024, December 2025	106-117
Varsity Article	6 May 2024	118-123
Varsity Article	27 November 2024	124 - 127
Cambridge for Palestine email to University Council	3 December 2024	128-131
Email to Student Task Members	28 January 2024	132
University Terms of Admission	Reviewed 21 April 2024	133-145
University's rules of behaviour, University's code of practice on meetings and public gatherings on University premises, University's guidance on demonstrations and protests, Regulations within Chapter II of the Ordinances of the University (general regulations for discipline) and	Various	146-171

University Code of Practice of Freedom of Speech.		
University Letter to Greenwich House Occupiers	2 December 2024	172-174
University Letter to Greenwich House Occupiers	24 November 2024	175-176
University Statement	3 December 2024	177-178
Court Documents – Greenwich House Occupation	May 2018	179-192
Court Documents –The Old Schools Occupation	March 2020	193-208
University Meeting Minutes	7 February 2025	209-212
University Graduation Dates	2023-2025	213-215
Oxford University Press	24 January 2025	216-232
BBC News Article	24 January 2025	233-235
Varsity News Article	7 February 2025	236-239
Plan showing location of warning notice – Greenwich House	N/A	240
Plan showing location of warning notices – The Old Schools / Senate House Site	N/A	241
Cambridge For Palestine – Facebook Posts	Various	242-372
Cambridge For Palestine – Instagram Posts	Various	373-556

(I) The University

- 8 The University was founded in 1209 and is made up of 31 constituent colleges. The University is centrally located within Cambridge, and its various colleges, departments and facilities are interspersed throughout the city.
- 9 The University's presence is a defining feature of Cambridge, and the various locations across the city create an integrated academic environment.
- 10 Each of the University's 31 colleges are governed by their own statutes and regulations, responsible for selecting their own students, providing accommodation, and offering pastoral and academic support.
- 11 The University has 24,912 students (numbers published in 2024) based on the 2024-2025 student statistics, and (as at 2022/2023) employs 12,556 members of staff in academic, academic-related, contract research, technical and administrative roles.

(II) The Land

- 12 The University is the proprietor of the freehold properties known as:
- 12.1 Greenwich House, comprising part of the land on the north side of Madingley Road, Cambridge (known as the Madingley Rise Site), which is registered at HM Land Registry under title number CB337595 and is shown edged red on the plan at **page 1 ("Greenwich House")**. Official copy entries for title number CB337595 are at **pages 2 - 19**;
- 12.2 Senate House, which comprises part of the land that is pending registration at HM Land Registry under title number CB489602 and which is shown annotated A012 on the plan at **page 20 ("Senate House")**;
- 12.3 Senate House Yard, the enclosed open courtyard area including lawn to the south of Senate House, which comprises part of the land that is pending registration at HM Land Registry under title number CB489602 and which falls within the red edging on the plan at **page 20 ("Senate House Yard")**; and

- 12.4 The Old Schools, which similarly comprises part of the land that is pending registration at HM Land Registry under title number CB489602 and which is shown annotated A014 / A011 on the plan at **page 20** (“**The Old Schools**”). A statutory declaration made in relation to The Old Schools, Senate House and Senate House Yard (which I refer to collectively in this statement as “**The Old Schools / Senate House Site**” can be found at **pages 21 – 25**).
- 13 I will refer to the areas of these sites sought to be covered by the injunction as “**the Land**”.
- 14 A plan showing the location of The Old Schools / Senate House Site (circled blue) and Greenwich House (circled red) can be found at **page 26**.
- 15 Greenwich House is an administrative office building; it is not one of the University’s academic buildings. It is a reasonably large office building extending to 2,735.82 metres squared, and it accommodates many employees of the University (approximately 500 in total although the average numbers day to day will be lower given hybrid working). It is home to several administrative departments of and numerous staff in the UAS. These include: (i) the Estates Division; (ii) Research Services; (iii) Health, Safety and Regulated Facilities; (iv) Human Resources; and (v) the Finance Division.
- 16 Generally, the University’s students do not have access to Greenwich House. The foyer entrance and the cafeteria of the building are open during working hours, but the other external entrances and interior doors are fitted with card readers. One needs to have an authorised card to access these entrances and the areas within the building beyond the foyer and the cafeteria. A student’s card would not be authorised to access these entrances and the areas within the building simply because they are a student at the University. I have verified this explanation of the access arrangements to Greenwich House with my colleague, Paul Oliver, Deputy Security Operations Manager.
- 17 As one might expect from the nature of the parts of the UAS based in Greenwich House, the University stores at the building physical records containing confidential, sensitive and personal information that only authorised University personnel have permission to access and inspect.

- 18 The Senate House and Senate House Yard, together with The Old Schools, comprise the ceremonial and administrative heart of the University. Senate House, including Senate House Yard, is where the University holds its formal ceremonies, including degree graduation ceremonies. Also, it is the official meeting place of the Regent House and the Senate.
- 19 The Old Schools is situated to the west of Senate House (it is physically distinct from Senate House). The Old Schools houses key University administrative departments, including the offices of the Senior Leadership Team, such as the Vice-Chancellor, the Pro-Vice-Chancellors, the Chief Financial Officer, the Director of Communications and External Affairs and the Registry (including their executive and secretarial support). Also within The Old Schools is the Office of External Affairs and Communications, the Governance and Compliance Division, Human Resources, the Strategic Partnerships Office, parts of the Finance Division, Legal Services, parts of Research Services and Reprographics (their work includes printing exam scripts). These teams deal with time critical tasks, such as the sealing of deeds and other property documents and complying with data subject access requests and other regulatory requirements.
- 20 The capacity for people working across The Old Schools site is 261 (plus meeting space). However, the average occupancy is around 100 per day, with numbers varying significantly across the week as a result of hybrid working.
- 21 A building being the Gonville and Caius College Library forms part of The Old Schools site but this is excluded from the University's claim for a precautionary injunction, as this is subject to a lease to Gonville & Caius (and this is therefore outside the red edging on the plan at **page 20**).
- 22 The Senate House and Senate House Yard, together with The Old Schools, form one enclosed site, with buildings on the north side, west side and approximately half of the south side. The east side along with the remainder of half of the south side is surrounded by a low wall and metal railing fence ("**Senate House Yard Fence**"). There are then:
- 22.1 Two gates within the Senate House Yard Fence on the east side of Senate House Yard ("**Senate House Yard Gates**").

- 22.2 In between Senate House and Gonville and Caius College Library, along Senate House Passage, there is a short section of low wall and metal railings fence, along with a gate ("**Senate House Passage Gate**").
- 22.3 An access into The Old Schools through an archway (within building) from Trinity Lane ("**the Archway**").
- 23 Google street images of the Senate House Yard Fence, Senate House Yard Gates, Senate House Passage Gate, and the Archway, are shown at **pages 27 – 29** and a plan showing the location of the gates can be found on **pages 30** (note the Senate House Yard Gates are marked 'Gate 1' and 'Gate 2').
- 24 The public do not have a right of access to the Senate House or The Old Schools. Senate House and Senate House Yard is only generally accessible to the University staff who work there. During degree graduation ceremonies, Senate House and Senate House Yard are accessible to those attending (graduands and their guests).
- 25 Students may access The Old Schools buildings for specific purposes, for example, to attend a University committee meeting of which they are a member or to book a meeting room (which be through our usual booking system and therefore subject to approval). But otherwise they do not have general access.
- 26 The public can access Senate House Yard because the Senate House Passage Gate and one of the Senate House Yard Gates are generally kept open during the day (and closed at night), but the public have no right to do so, and during particular periods, as described below, these gates are closed during the day.
- 27 The security arrangements are as follows:
- 27.1 **Senate House:** This is kept locked at all times except when there are events at Senate House such as degree graduation ceremonies;
- 27.2 **The Old Schools including access through the Archway:** The main access is from Trinity Lane through the Archway. The Archway is kept open during the day but closed out of hours. During the course of last year, when the risk of trespass was considered to be higher due to protests nearby to The Old Schools / Senate House Site, the Archway was closed and access was only possible through a

wicket gate which was manned by a security guard. Once through the Archway there is a courtyard with reception on the right-hand side as you enter. There are two glass card access doors to go through in order to reach reception and two further card access doors to pass through to reach further into the building. The outer door is unlocked during working hours. The inner door to reception is always locked and the receptionist lets people into the reception area. There are various doors in the buildings which surround the courtyard and these all require card access. Access into The Old Schools buildings can also be taken from Senate House Yard but again any doors from that side of the buildings require card access.

27.3 **Senate House Yard Gates:**

27.3.1 The gate nearest Senate House ('Gate 2') is usually locked as it is not used except during graduations (when it is open in order to let students file into the Senate House).

27.3.2 The other gate ('Gate 1') is normally kept open during the day but locked at night (generally around 6pm). At Gate 1 there is a sign that says "Private – No entry by the public". Again, during the course of last year, when the risk of trespass was considered to be higher due to protests nearby to Senate House Yard, Gate 1 was locked as well as Gate 2.

27.3.3 At the time of the occupation of Senate House Yard in November 2024, there were additional persons patrolling Senate House Yard. As at the time of writing, Gate 1 is currently open during the day but the University continues to monitor the security arrangements and assess the risks around a further encampment.

27.4 **Senate House Passage Gate:** As you enter the Senate House Passage Gate there is a sign that says "Private – No entry by the public". The Senate House Passage Gate is kept open during the day but locked at night (generally around 6pm). Again, during the course of last year, when the risk of trespass was considered to be higher due to protests nearby to Senate House Yard, this was kept locked. As at the time of writing, Senate House Passage Gate is currently

open during the day but the University continues to monitor the security arrangements and assess the risks around a further occupation.

27.5 I am informed by Clara East, Head of Business Continuity at the University, that the gates at The Old Schools / Senate House Site were closed for 143 days during 2024 for the reasons set out above.

(III) The Defendants

28 The University brings its claim against “persons unknown” as described in the title page to this witness statement.

29 Cambridge for Palestine is believed to be a student-led group. It is not a registered society with the University’s Student Union, nor am I aware whether it has any formal constitution. The group maintains social media profiles on X (formerly known as Twitter), Instagram, Facebook and Tik Tok. At **pages 242 to 372** (inclusive) are their Facebook posts and at **pages 373 to 556** (inclusive) are there Instagram posts. It also has a dedicated website at ‘www.cambridge4palestine.org’.

30 As shown by this social media, Cambridge for Palestine engages in various activities in support of Palestine and in the context of the conflict in Gaza. These activities include organising and promoting lectures, talks and similar events, and posting on its social media profiles about humanitarian crises of those living in Gaza.

31 However, the group’s stated aim on its website is as follows: “*We are a coalition standing against Cambridge University’s complicity in the genocide of and apartheid against Palestinians.*” One of the group’s focuses is on the University’s alleged complicity in the actions of the Israeli Defence Force in the conflict in Gaza and the University’s financial, academic, research, and other relationships with third party companies and other entities that have connections with Israel in the context of the current military conflict in Gaza. I set out an extract from the website containing Cambridge for Palestine’s demands:

“DISCLOSE the University of Cambridge’s financial ties with institutions and companies complicit in Israel’s violations of international law.

“DIVEST from institutions and companies complicit in the ongoing ethnic cleansing of Palestine.

“REINVEST by supporting Palestinian students, academics, and scholars in the University of Cambridge and the reconstruction of higher education institutions in Gaza.

“PROTECT the academic freedoms and safety of all University of Cambridge students, faculty, and staff and become a University of Sanctuary.”

32 The group has organised and supported various disruptive demonstrations, and, in connection with these demonstrations, made various demands of the University, all of which centre on the stated main aim that I have described above.

33 The University and its constituent colleges have in the past 12 months experienced several incidents of trespass and other unlawful activities that have been organised by Cambridge for Palestine, or similar groups, or which have been carried out by persons who are affiliated with one or more of these groups, one of which was so serious that the University felt obliged to apply to the High Court to obtain an interim non-disclosure order. I describe these incidents below.

(IV) Previous incidents of direct action

(a) King’s College – encampment (May 2024)

34 On or around 6 May 2024, persons believed predominantly to comprise students associated with Cambridge for Palestine set up an encampment on the lawn in front of King’s College, Cambridge, in Cambridge City centre. This appears to have been part of a wave of student demonstrations and encampments at UK universities in protest over the war in Gaza. I refer to the Varsity article of 6 May 2024, a copy of which is at **pages 118 - 127**. A further article published by Cambridgeshire Live on 6 May 2024 can be found at **pages 31 - 34**, which reports on the alleged aims of the group:

“A spokesperson for Cambridge for Palestine, the group behind the encampment in Cambridge, said: “We demand that the University of Cambridge: discloses and divests from its financial and professional support for Israel’s genocide of Palestinians in Gaza; re-invests in affected academics; and protects all forced migrants and protesting students.”

35 I set out an extract from an article by Freedom News on 17 May 2024, which can be found at **pages 35 – 38**, which further reports on the encampment:

“The encampment is operated by Cambridge for Palestine, a student-run organization created to protest against Israel’s genocide in Gaza that has set up an encampment on the lawns of King’s College in central Cambridge, an impossible-to-miss demonstration. The camp is demanding disclosure of the University’s ties to Israel, divestment from Israel and reinvestment into Palestinian livelihood, and additional protection for pro-Palestine students.

“According to Mahmoud, “Freedom of Information reports have found that at least three colleges at Cambridge have invested millions of pounds into companies like Caterpillar, BAE, and Elbit systems, directly fuelling the massacre.”

36 This encampment ended in or around 14 August 2024.

(b) Senate House Yard – first encampment (May 2024)

37 On 15 May 2024, shortly after the encampment of King’s College began, a group believed to be connected with the encampment at King’s College, Cambridge, set up an encampment on Senate House Yard. The number of occupiers initially recorded were estimated to be between 40-50.

38 The gates into Senate House Yard were locked at the time and we know that they entered by means of a ladder.

39 There were around 12 to 13 tents throughout the occupation. In terms of the number of individuals present, although numbers peaked to approximately 100 when they had daytime marches, the average number of those staying overnight was thought to be around 20. I refer to the Cambridge for Palestine’s Instagram posts at **pages 515 – 519** showing the encampment.

40 Multiple tents were erected in scattered formation across the lawn of Senate House Yard. A meeting area appeared to be erected under the colonnades of The Old Schools building. At various times banners displaying Pro-Palestinian messaging was spread across the Senate House Yard Fence and the Senate House.

41 Gates to the Senate House Yard were locked but staff were still able to use the West Courtyard for access to The Old Schools buildings. Doors under the colonnades within The Old Schools buildings (East/South doors) were locked internally using a secure bar

to prevent the group from accessing the buildings further. This also stopped these doors from being used by staff, who ordinarily would have used these doors as an access route into and out of the buildings.

42 The encampment ended by the occupiers' voluntary departure on 16 May 2024, at around 22:20. The University was forced to reorganise its degree graduation ceremonies due to be held at Senate House and hold them elsewhere (at colleges), which was allegedly one of the stated objectives of the encampment. I refer to the extract of the BBC articles at **pages 39 – 44**. I also refer to Cambridge for Palestine's Instagram post at **page 516** which says, "*Disrupting graduation is a last resort which we absolutely do not wish to take, but...we have been left with no other choice*". As far as I am aware, the area was left by them in a tidy state. All the occupiers had their faces covered or partially covered during the encampment.

43 I have verified the account above with Peter Hardy, Head of Security for the University.

(c) Senate House Yard – second encampment (November 2024)

44 On or around Wednesday 27 November 2024, a group believed to be connected to Cambridge for Palestine again set up an encampment on Senate House Yard. I refer to Cambridge for Palestine's Instagram posts at **pages 500 - 508** showing photos of the encampment and them saying "We are back". They entered by climbing over the Senate House Yard Fence. There were approximately 6 tents. The average number of those staying overnight appeared to be around 5-8. These tents were erected in scattered formation across the lawn.

45 What appeared to be a meeting area was erected under the colonnades of The Old Schools buildings. They attempted to block the view of this area by attaching large sheeting/bedding from each of the colonnades. We had limited CCTV within the colonnades, which indicated the area was used for discussions and as a social area. At various times banners displaying Pro-Palestinian messaging was spread across the front fencing and the Senate House.

46 The occupiers departed by their own volition on Saturday 30 November 2024. As far as I am aware, the area was left by them in a tidy state.

47 The occupiers had their faces covered or partially covered during the encampment.

48 Again, I have verified the account above with Peter Hardy, Head of Security.

49 Regrettably, the encampment ended only after the University was once again forced to reorganise the degree graduation ceremonies that had been scheduled to take place at Senate House on Saturday 30 November 2024. These had to be held at Great St Mary's Church instead.

50 I refer to the Varsity article of 27 November, a copy of which is at **pages 45 - 48**, and the various extracts of social media posts at **pages 49 – 69**.

51 Social media posts demonstrate this encampment was targeted at disrupting graduations. On 29 November 2024, Cambridge for Palestine said (see **page 322**):

“Tomorrow, hundreds of Cambridge students will be attending their graduation ceremony. Our presence at the Liberated Zone on Senate House Law has forced the University to move graduations – typically held at Senate House – to Great Saint Mary’s Church across the street.”

52 Then, on 30 November 2024 (see **page 330**) Cambridge for Palestine said:

“Today, Cambridge was forced to move its graduation ceremonies, historically held in Senate House...after four days of occupation and the disruption of Cambridge’s graduation ceremonies, we have concluded our encampment at Senate House Lawn”.

(d) Occupation of Greenwich House (November 2024)

53 Shortly prior to the second encampment of Senate House Yard, on the evening of Friday 22 November 2024, a group of persons believed to be connected to Cambridge for Palestine entered Greenwich House. They activated the fire alarm, which led to staff in Greenwich House evacuating the building, and they then blockaded the entrances and exits to prevent University staff from re-entering the building. The occupation ended voluntarily on Friday 6 December 2024.

54 During the occupation, on 25 November, 27 November and on 28 November, the University's security staff, by observing from the exterior of the building, observed the occupiers of Greenwich House gaining access to restricted areas of the building, opening locked cabinets and searching through cabinets. This precipitated the

University's application of 6 December 2024 against persons unknown for an interim non-disclosure order to prohibit the dissemination of confidential information obtained from within the building (amongst other things) (claim number is BL-2024-001755). A copy of the interim injunction order dated 16 December 2024, made at the return date, is at **pages 70 - 78**.

55 Again, the occupation appeared to be a demonstration against the University's alleged complicity in the actions of the Israeli Defence Force in the conflict in Gaza and the University's investments in and research arrangements with the defence industry. As part of their demonstration they named Greenwich House, "Kanafani House" (see **page 476**). I refer to the extracts of social media posts at **pages 373 - 454** (inclusive) and the BBC news article of 27 November 2024 at **pages 79 - 81**.

56 The occupation of Greenwich House disrupted the University's activities and posed a significant threat to the safeguarding of the confidential, commercially sensitive and/or personal information stored at Greenwich House.

57 This was a significant escalation of seriousness in relation to the attempts of Cambridge for Palestine to disrupt the activities of the University since they first began their campaigns in May 2024. Furthermore, they had a clear and stated interest (see for example the social media post at **page 305**) in the University's relationship with companies connected with the defence industry, such as Rolls Royce and BAE Systems (amongst others), in relation to which confidential documents were stored in Greenwich House.

58 In response to the University obtaining the interim non-disclosure order, the University received an email on 20 December 2024 from "the former occupiers of Greenwich House" saying that they:

"make clear that we are not in possession of any documentation, images, replications or copies of any documentation that are stored in Greenwich House. As such, we will not publish, communicate or disclose any documentation or information derived from or copied from Greenwich House, given that we are not in possession of said materials".

59 However, it remains a serious concern for the University that confidential, sensitive and/or personal information was accessed by persons not authorised to inspect such information and that this could lead to the unlawful dissemination of this information.

(V) Issues caused by the previous encampments and occupations

60 The two encampments of Senate House Yard and the occupation of Greenwich House have caused a number of significant issues for the University.

(a) Greenwich House (November 2024):

61 As I state above, Greenwich House is one of the University's administrative buildings and is home to several important administrative departments of the University. It houses confidential, commercially sensitive and personal information.

62 **Operational disruption:** The occupation caused significant disruption to the work carried out in administrative departments of the University, including in the Estates Division, Research Services, Health, Safety and Regulated Facilities, Human Resources and the Finance Division.

63 University staff were unable to work at Greenwich House from late afternoon on 22 November 2024 and only returned to Greenwich House on 8 January 2025.

64 During this period some staff were able to work from home but others needed to be accommodated in alternative University buildings. The University does have other buildings which could accommodate these staff, but they are not all set up to accommodate staff from Greenwich House at short notice and staff had to be relocated to various University buildings across its estate. For example, some staff temporarily worked out of the Roger Needham Building and the finance team were relocated temporarily to the PostDoc Academy. This involved significant resource to organise.

65 In addition, the University had to ensure that appropriate workstations were set up in these other buildings and its employees' individual needs were accommodated, including making equipment (such as spare laptops) available, particularly as some staff were unable to access such items which were still in Greenwich House.

66 When staff could return to Greenwich House, the University had to carry out an audit of the documents within the building to try and establish whether they had been inspected or interfered with during the occupation. This involved heads of Divisions and various members of staff. This has resulted in a significant draw upon the University's resources, as University staff are diverted from their usual duties by having to survey the extent of the intrusion.

67 **Risk of unlawful dissemination or collection of information:** There remains the concern around the risk of unlawful dissemination or collection of confidential, commercially sensitive and/or personal information, given the activities of the occupants, who were observed gaining access to restricted areas of the building, opening locked cabinets and searching through cabinets.

68 The University has had to make a report to the Information Commissioner's Office in relation to the potential personal data breaches that may have occurred as a result of the persons unknown occupying Greenwich House. The University has also had to assess the impact on individuals whose personal data and/or other information may have been inspected and/or copied as a result of persons unknown who were occupying Greenwich House.

69 The University has had to identify the research partners and other stakeholders that the University needed to notify of the potential unauthorised inspection of confidential, sensitive and personal information that is likely to have occurred as a result of the occupation of Greenwich House by persons unknown, and of the ongoing risks relating to the potential publication, copying and sharing of that information. This has been a complex process, requiring my colleagues to review the contractual obligations with each relevant partner and in relation to each relevant project.

70 This continues to raise the risk of damage to the interests of individuals, the University's research partners and other stakeholders, as well as the University's activities and its reputation and could still lead to the imposition on the University of regulatory and/or civil liability.

71 **Costs**

- 71.1 **Security:** From Friday 22 November 2024 to 6 December 2024, there was a significant draw upon the University's security team who were called upon to monitor the activities of the occupiers at Greenwich House and The Old Schools / Senate House Site, and thereafter over the Christmas period until 8 January 2025 when the building was reoccupied. In addition, the University had to employ an external security company to assist with monitoring Greenwich House and Senate House/ The Old Schools Site (which I come on to in the next section). For the period from June 2024 to January 2025, the University incurred additional security costs which were substantial.
- 71.2 **Cleaning:** In addition, before staff returned to Greenwich House, the University had to undertake additional cleaning and an electronic security sweep.
- 71.3 **Legal costs:** As I state above, this occupation necessitated the University's application of 6 December 2024 for an interim non-disclosure order, made at the return hearing of 13 December 2024. The costs of those proceedings, which are ongoing, have been substantial.
- 72 The costs outlined immediately above are at least £230,000 (inclusive of VAT).
- 73 **Health and safety:** During the occupation of Greenwich House there were concerns around the health and safety of the occupiers. Several occupiers were observed climbing on furniture and accessing parts of the building that were previously locked. The University had limited visibility as to what was happening inside the building because many of the windows were blocked up. As the occupiers had physically locked themselves in the building, the University was concerned about fire safety. Also, as the University did not have access to the building it could not guarantee food hygiene (food remained in the cafeteria).

(b) Occupations of Senate House Yard in May and November 2024

- 74 **Disruption to graduations at Senate House:** The main issue caused by these occupations has been the disruption of degree graduation ceremonies at Senate House, due to take place in May and November 2024, which had to be moved to individual colleges and Great St Mary's Church respectively.

- 75 In May 2024, as a result of the Senate House Yard occupation, the graduations of at least 1158 graduands and 2773 guests were disrupted. The University had to arrange for the graduations to take place in colleges.
- 76 In November 2024, as a result of the Senate House Yard occupation, the graduations for more than 500 graduands were disrupted. The University had to arrange for the graduations to take place in Great St Mary's Church. Again, this was at short notice, and whilst the staff at Great St Mary's were accommodating, the University cannot rely on this assistance in the future.
- 77 The impact of these occupations affected not only the graduands involved but also their guests (families and friends), many of whom had travelled long distances to celebrate the special day. It also placed significant stress on the University and college staff who had to reorganise the graduation ceremonies. Following this disruption we received complaints from students who were graduating, their guests, and from colleges.
- 78 The University does not currently have other buildings which are appropriate to host graduations, not only because the space would need to be large enough to accommodate all those involved in the graduation ceremony, but also because the building would need to reflect the significance of the occasion for the graduands and their guests; in other words, it would need to be comparable with the setting of Senate House.
- 79 In May 2024, although colleges were accommodating, this placed a significant amount of additional work on the University's staff. 21 colleges assisted by hosting graduations due to take place on 17 May 2024, and 7 colleges assisted by hosting graduations due to take place on 18 May 2024. The colleges operate independently to the University, so are not obliged to assist the University in hosting graduations. Some colleges have already said that they will not assist in future.
- 80 Moving the graduations, particularly at short notice, has had a significant adverse impact on the graduands' experience. The adverse impact amongst graduands and their guests is reflected in a Varsity article dated 29 November 2024 (at **pages 82 - 85**) where it was reported in relation to moving the graduation to Great St Mary's Church:

“One student said that they can “attest to general feelings of utter devastation and pain, especially among working class home and international students who’ve paid significant amounts of money to get here.””

81 **Costs:** There has also been a cost to the University in having to relocate the graduations. The University had to pay colleges for hosting the relocated graduations in May 2024 and it also incurred marquee costs due at Senate House. In November 2024, the University had to compensate Great St Mary’s Church for loss of income.

82 As set out above, the University incurred significant further security costs in monitoring The Old Schools / Senate House Site (which are included in the figures above at **paragraph 72**).

83 More generally, there have been considerable costs arising from staff time spent managing the occupations and their aftermath (including meetings with the University’s Silver and Gold Team response teams, meetings of senior officers, out of hours work by Estates and Communications teams in particular, staff preparing for building reopening and rearrangements (including out of hours), and contingency planning).

(VI) The University’s engagement with demonstrators

84 Following the encampment at Senate House Yard in May 2024, there was frequent engagement between members of Cambridge for Palestine and Professor Kamal Munir, Pro-Vice-Chancellor for University Community and Engagement, and Professor Bhaskar Vira, Pro-Vice-Chancellor for Education, both of whom acted as a point of communication on these issues between the group and the decision-making bodies of the University.

85 The encampment at King’s College ended in part because the University agreed with representatives for Cambridge for Palestine that the University would review its approach to investments in, and research funded by, the defence industry (see BBC articles at **pages 86 - 89**). It was also discussed with representatives for Cambridge for Palestine that a Working Group be established to make recommendations to the relevant University committees that oversee policies in relation to investments and research. There is a copy of the University’s statement titled, *“Upholding our values: responding*

to calls from our university community” published on 1 August 2024 at **pages 109 - 113**, which set out the University’s commitments on these issues.

- 86 It was agreed by the University that membership of the Working Group would include students. The University’s proposal, including terms of reference for the Working Group, was presented to the University Council for discussion in October 2024 and approved (see **pages 95 - 100**). The Council concluded that the Working Group had a balanced membership with strong student representation. Of the nine Working Group members, two were to be student representatives from a task force (which I understand comprises representatives from Cambridge for Palestine) and one a student member of the Council (**pages 101 - 102**).
- 87 The Vice-Chancellor of the University also reported at this Council meeting that the task force had expressed dissatisfaction regarding the proposed membership of the Working Group and had asked for the membership to be amended. This is reflected in the social media posts, copies of which are at **pages 272 - 278**.
- 88 On 25 November 2024, the University Council reaffirmed membership of the Working Group to explore the University’s relationship with the defence industry. The terms of reference for this group were also reaffirmed and the University confirmed that this important work would commence. There is an extract of the Council’s minutes, “*Minute 994: Terms of Reference: Working Group on Investments in and Research funded by companies belonging to the Defence Industry*”, at **page 103**.
- 89 However, on 28 November 2024, a decision was made by the University Council to suspend the two student members from the task force from membership of the Working Group, because of the Senate House Yard occupation (as set out in **paragraph 44** above).
- 90 It was relayed to the student members of the task force that the suspension would continue to take effect if the encampment in Senate Yard House was not disbanded and the occupation of Greenwich House was not ended. The emails recording this decision can be found at **pages 104 - 105**.

91 The University did however continue to engage with members of the Cambridge for Palestine task force, as recorded in its public statement of 3 December 2024 (**pages 116 - 117**).

92 The University has published several communications confirming these matters, copies of which can be found at **pages 106 – 117**).

93 Cambridge for Palestine claimed that the occupation of Greenwich House which commenced on 22 November 2024 was organised because the University had, they allege, broken the terms negotiated with representatives for the encampments in May 2024 for a review of the University’s ties with the defence and arms industry. Cambridge for Palestine have made a series of demands, some of which relate to how they consider this review ought to be conducted and how a working group should be constituted; I refer to the Varsity article extracts, and social media posts at **pages 375 - 379**.

94 I set out below a quote from the social media profile for Cambridge for Palestine, which can be found at **page 290**:

“Why are we escalating?

We are occupying Greenwich House, the administrative centre of Cambridge University. This summer, the encampment had negotiated with the University and decamped on good faith. Since then, we have received nothing but stalling and manipulation.

We demand that the University must:

- 1. Recognises and condemn the genocide in Palestine, in line with international law*
- 2. Give us fair representation and meet with our complete nominated task force*
- 3. Prioritise an aggregate analysis of its investments in arms and genocide profiteering”*

95 I set out below quotes from the social media profile for Cambridge for Palestine, which are at **pages 303 and 305**.

“We applaud our students for their determination to speak up against their institution’s failure to end its complicity with companies whose products are being used to perpetrate horrendous crimes...”

The University also has longstanding research collaborations and partnerships with some of the same companies including Boeing, BAE systems and Rolls Royce”.

96 On 3 December 2024, the University Council received an email from those representing Cambridge for Palestine, expressing their dissatisfaction at the progress to date with the Working Group, and setting out slightly different demands, which can be found at pages **128 - 131**. Since this email, I understand from the Pro-Vice-Chancellor for Education that there has not been anything further from those representing Cambridge for Palestine.

97 On 27 January 2025, the University Council discussed the student membership of the Working Group at its meeting. It was agreed that the two members of the task force should be invited to re-join the Working Group subject to two conditions. A copy of the email dated 28 January 2025 inviting them to re-join and recording those conditions can be found at **page 132**. There was no reply from the two students to this email but I understand they attended the first meeting of the Working Group, which took place on 5 February 2025.

(VII) The student contract

98 A student’s contractual relationship with the University is principally governed by:

98.1 The offer of a place to study at the University from one of the constituent colleges of the University, and the student’s acceptance of that offer;

98.2 The terms of admission, a copy of the undergraduate terms of admissions for October 2024 is exhibited at **pages 133 – 145**; and

98.3 The University’s regulations and policies.

99 These rules, regulations and policies apply to all students, and include:

99.1 The University’s rules of behaviour;

- 99.2 The University's code of practice on meetings and public gatherings on University premises;
- 99.3 University's guidance on demonstrations and protests;
- 99.4 Regulations within Chapter II of the Ordinances of the University (general regulations for discipline); and
- 99.5 University Code of Practice of Freedom of Speech (processes for meetings and events on University's premises).
- 100 These are publicly available on the University's website and copies of the documents above can be found at **pages 146 – 171**.
- 101 By accepting an offer to study at the University and by the Terms of Admission, §31, students must comply with the University's Rules of Behaviour and Code of Practice of Freedom of Speech.
- 102 By the Rules of Behaviour:
- “1. A registered student must:*
- (a) comply with instructions issued by any person or body authorized to act on behalf of the University, in the proper discharge of their duties;*
- (b) comply with all health and safety regulations and instructions issued by the University, a College or other associated institution;*
- ...
- (d) comply with the terms of the code of practice issued under the provisions of section 43 of the Education (No. 2) Act 1986 regarding meetings and public gatherings on University Premises;*
- (e) comply with the Statutes and Ordinances and any rules and procedures established under the Statutes and Ordinances.*
- 2. A registered student must not:*

(a) interfere or attempt to interfere in the activities of the University, a College, or any member of the collegiate University community in the pursuit of their studies or in the performance of their duties;

(b) damage, misappropriate or occupy without appropriate permission any University or College property or premises, or any property or premises accessed as a result of a College or University activity ...”

103 Students therefore know what is expected of them. During the occupation of Greenwich House in November 2024, I wrote to all students of the University occupying Greenwich House to remind them of the above rules and to advise them of the seriousness of their potential actions in remaining in Greenwich House and carrying out activities relating to access of personal data or sensitive/confidential materials (see letter dated 2 December 2024 at **pages 172 -174**).

(VIII) The Codes of Practice on Freedom of Speech (“the Code”)

104 The purpose of this section of my statement is to address the University’s commitment to freedom of speech, and the procedures it has put in place to safeguard this principle.

105 The terms of admission expressly require that the student comply with the University’s regulations and policies. These policies include the Code. This revised Code applies with effect from 1 August 2024.

106 In its introductory statement, the Code states:

1.1 The University of Cambridge, as a world-leading education and research institution, is fully committed to the principle, and to the promotion, of freedom of speech.

107 The Code outlines the various legislative frameworks under which such freedoms must be upheld:

3.3 These concepts are underpinned by the Human Rights Act 1998, which brings the European Convention on Human Rights into direct effect in national law. Article 10 of the Convention articulates freedom of expression as a human right and sets out the limited circumstances in which that right might be circumscribed (such as to protect public safety, for the prevention of disorder or crime, or for the protection of the reputation or

rights of others). These concepts also exist within other UK legislation. Universities in England have duties under the Higher Education and Research Act 2017 (as amended by the Higher Education (Freedom of Speech) Act 2023) to take such steps as are reasonably practicable to secure and promote freedom of speech and academic freedom within the law for staff and students and for visiting speakers.

108 Furthermore, the Code outlines the qualifications on freedom of speech by reference to other legal duties and considerations:

3.4 Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on certain bodies, including higher education institutions such as the University, in the exercise of their functions to have ‘due regard to the need to prevent people from being drawn into terrorism’. This necessitates the establishment of protocols and procedures by which to assess the risks associated with meetings or events that are University hosted, affiliated, funded, or branded. This Act also requires the University to have particular regard to its other duties with regard to academic freedom and freedom of speech. Debate, discussion, and critical enquiry are, in themselves, powerful tools in preventing people from being drawn into terrorism.

3.5 Under the Equality Act 2010, staff and students must not be subjected to unlawful discrimination, harassment, intimidation or threats of violence on the grounds of race, sex, age, religion or philosophical belief, sexual orientation, disability, gender reassignment, marriage and civil partnership, or pregnancy or maternity. However, the provisions of the Equality Act 2010 are not to be interpreted to undermine freedom of speech and academic freedom. As a result, students’ learning experience and the working environment of staff may include exposure to research, course material, discussion or speakers’ views that they find offensive, contentious or unacceptable, but are nonetheless within the law, and unlikely to be considered unlawful harassment or discrimination under the Equality Act 2010.

109 The Code refers to the University’s values in so far as they are relevant to the subject matter of the Code:

4.1 The University’s core values are ‘freedom of thought and expression’ and ‘freedom from discrimination’ and it encourages its staff, students and visitors to engage in robust, challenging, evidence-based and civil debate as a core part of academic enquiry and

wider University activity, even if they find the viewpoints expressed to be disagreeable, unwelcome or distasteful. The steps the University takes to embed its values in practice are set out in Section 5 below.

4.2 The University fosters an environment in which all of its staff and students can participate fully in University life, and feel able to question and test received wisdom, and to express new ideas and controversial or unpopular opinions within the law, without fear of intolerance or discrimination. In exercising their right to freedom of speech, the University expects its staff, students and visitors to be tolerant of the differing opinions of others, in line with the University's core value of freedom of expression. The University also expects its staff, students and visitors to be tolerant of the diverse identities of others, in line with the University's core value of freedom from discrimination. While debate and discussion may be robust and challenging, all speakers have a right to be heard when exercising their right to free speech within the law. Neither speakers nor listeners should have reasonable grounds to feel censored or intimidated.

4.3 The University will ensure that staff are able to exercise freedom of thought and expression within the law without placing themselves at risk of losing their job or any University privileges and benefits they have or the likelihood of their securing promotion or different jobs at the University being reduced. The University expects all staff and students to engage with intellectual and ideological challenges in a constructive, questioning and peaceable way. The right of staff and students to freedom of assembly, and to protest against certain viewpoints, should not obstruct the ability of others to exercise their lawful freedom of speech.

- 110 Finally, section 6 of the Code sets out the procedures and protocols that the University has implemented to give effect to its duties and to further its values, including how a student or other member of the University may organise an event or meeting. It begins with the general principles to be applied:

6.2 The starting point should always be that the event should go ahead and that cancellation is exceptional and undesirable. Depending on the circumstances, it may however be reasonable to refuse permission for a University meeting or event where the University reasonably believes (from the nature of the speakers or from similar activities in the past whether held at the University or otherwise) that: ...

6.2.6 it is in the interest of public safety, the prevention of disorder or crime, the proper functioning of the University or the protection of those persons lawfully on University premises, that the meeting does not take place.

111 Rule 6.7 then states that the processes in “the Annex” shall be followed “*Where any person or body to whom this Code of Practice applies is seeking to hold a University event or meeting on University premises which is outside of the normal academic curriculum the processes in the Annex shall be followed*”.

112 The Annex provides as follows:

Annex: Processes for meetings and events on University premises

A1. This Annex is issued under paragraph 6.7 of the University’s Code of Practice on Freedom of Speech...

Organisation and approval of meetings and events on University premises

A2. Any meeting or event on University premises to which this Annex applies should have at least one organiser who is responsible for the meeting or event and is a member, member of staff, or student of the University. If a meeting or event is proposed without such an organiser, it may only proceed on condition that a member, member or staff or student is identified or nominated as the organiser responsible for the meeting or event.

A3. Permission is required for meetings and events to be held on University premises, whether indoors or outdoors. In the case of accommodation assigned to a single Faculty or Department, the permission of the relevant Faculty or Departmental authorities is required. In the case of accommodation not so assigned, permission must be obtained from the central University authority responsible for the accommodation concerned and, if a room is to be reserved, a booking must be made through that authority at least fourteen working days in advance of the proposed event. Further details of who to contact are available in the University’s Guidance for Booking Meetings and Events.

113 For the encampments of Senate House Yard in May and November 2024, and the occupation of Greenwich House in November 2024, the occupiers did not seek or have permission to occupy these parts of university property. In the case of the occupation of Greenwich House, on Sunday 24 November 2024, I sent a letter to the occupiers

confirming this fact and I also referred them to the Code and encouraged them to comply with the process set out within it for obtaining the University's permission before organising an event on University property (a copy of the letter can be found at **page 175 - 176**).

- 114 Cambridge for Palestine have made clear in social media posts that their aim is to cause disruption to the University (see for example **pages 544 - 546**) and, therefore, I am concerned that they will deliberately not follow the processes set out in the Code in the future.
- 115 In any event, should a student have made a prior request, the University would not have consented to an occupation of a building such as Greenwich House, given this is an administrative building to which only authorised personnel have access (and also as the occupations are designed to exclude the University itself and its staff from using the building). Nor would it have consented to the occupation of Senate House Yard for similar reasons. The University takes seriously its commitment to freedom of expression and its legal duties; but that does not mean that it must tolerate being dispossessed of its property.
- 116 The occupation of Greenwich House caused significant disruption for the University and its staff, and posed significant risks to the University, its partners and others. The actions of the occupiers (or of some of them) was unacceptable. The deliberate breaches of the internal security measures within the building and the apparently intentional search for documents were not legitimate acts of protest.
- 117 The intentional disruption of student graduations is also unacceptable. That is why I felt it necessary to make a statement on 3 February 2025 that we were exploring legal options that will protect certain limited areas of the University, including Senate House and Senate House Yard, from future occupations so that we can hold the graduations that our students and their families expect (see the statement of 3 February 2025 at **pages 177 – 178**).
- 118 There are other University spaces where persons may engage in legitimate forms of protest. The relief sought will not prevent any student or other University member from requesting permission to hold events on these spaces in accordance with the Code.

(IX) Previous occupations

- 119 Allied to what I say above with regards to the likelihood that the University would tolerate an occupation of this kind, I wish to draw attention to the fact that there have been previous student-led occupations of University property, including at Greenwich House. In those cases, it has previously been the University's approach that an occupation of its property to the exclusion of the University itself and its staff is not a demonstration that the University will or should tolerate, and that any such occupation should be ended by court action if necessary.
- 120 In May 2018, a student-led group comprising members of a student group, "Cambridge Zero Carbon Society" occupied Greenwich House in a similar manner to the occupation of Greenwich House in November 2024. They entered the building on 18 May 2018. The University issued court proceedings for possession on 23 May 2018, and a writ was obtained on 25 May 2018 which led to the removal of the occupiers. Some of the relevant court documents in that case can be found at **pages 179 - 192**.
- 121 In March 2020, a student-led group comprising members of student groups, "Cambridge Defend Education" and "the Cambridge Marxist Society" occupied The Old Schools. The occupation commenced on 3 March 2020, and the University issued proceedings for possession, including an application to abridge time for service to enable the claim to be heard urgently, on 11 March 2020, and the claim was heard on 13 March 2020. Copies of some of the relevant court documents in that case at **pages 193 – 209**.

(X) The University's decision to bring these proceedings

- 122 I have held frequent meetings with senior University officers (which includes various Heads of Schools, Pro-Vice-Chancellors, and the Vice-Chancellor), throughout the recent occupations to discuss the University's response and strategy.
- 123 A meeting of certain senior University officers was convened on 7 February 2025 to consider the relevant facts and matters relating to a precautionary injunction order to prevent the sort of unauthorised protest activities set out in this statement on the Land, and to make a final decision as to whether to apply to Court for such an order.
- 124 I, in consultation with the attendees present from the University at that meeting, resolved that the University should bring the application and that I would authorise the

proceedings acting under the power which is recorded as delegated to me as the Registry in the University's Statutes and Ordinances at Chapter XIII (Finance and Property), paragraph 22.1.

- 125 A copy of the minutes of the meeting can be found at **pages 209 - 212**.
- 126 For the avoidance of doubt, the decision to bring these proceedings was based entirely on the impact of the direct action threatened on the University, its staff and students and has nothing whatsoever to do with the particular race, religion or beliefs of the Defendants. The same decision would have been reached had it been any other group posing the same risk.

(XI) Identifying the Defendants

- 127 The University has taken steps to try and identify persons unknown who occupied Senate House Yard and Greenwich House during the course of the last year. I have verified the steps below with Clara East, Head of Business Continuity at the University.
- 128 This has involved collating imagery from a variety of sources, including Cambridge for Palestine Instagram posts and videos (including screenshots from the latter), photos taken by staff from the Student Services Centre at the graduations (held at Great St Mary's Church opposite the Senate House Yard encampment in November 2024) and by security through windows of Greenwich House, bodycam footage from the security team at Greenwich House and CCTV footage where available (although most cameras had been covered by the occupiers). We did some pre-filtering of images first to make the exercise more manageable (as there were hundreds of hours of CCTV footage so it would have been impractical otherwise). This imagery has then been reviewed by the security team to collate images which have then been shared with certain members of the constituent colleges of the University (such as Senior Tutors or Head Porters) who were willing to help.
- 129 This has not been a straightforward exercise, because it has principally depended on being able to visually identify students who may have participated in these occupations and is dependent on the cooperation of the constituent colleges of the University. Also, it relies on the clarity and extent of the CCTV, security body camera footage and social media data available. The occupiers have covered or partially covered their faces, and

so there have been challenges in identifying these persons from the visual material to which the University has access.

130 Another option which was considered for identifying occupiers was through Wi-Fi access records for Greenwich House. However, we concluded that this was unreliable given that records also pick up passersby on access routes close to the building.

131 There were concerns that anything beyond these processes would have involved sharing images much more widely, for example through a webpage, with a high risk of misidentification and possibly victimisation among other adverse consequences.

132 At the date of settling this statement, I understand that the University has only been able to identify one individual who was in occupation of Greenwich House between Friday 22 November 2024 and Friday 6 December 2024.

133 At the moment, the University has no evidence that this particular individual plans to participate in direct action on the Land in the future. For that reason, it has not joined him as a named defendant to these proceedings. We think it would be unfair to single him out and to subject him to the media attention that he might get if he were the only individual named.

(XII) The relief sought by the Claimant – the risk of continuing trespass on the Land

(a) Real and imminent risk

134 The University is concerned that there is a real and imminent risk that the Defendants will continue to carry out direct action on the Claimant's land in the furtherance of their protest. The Defendants have organised and supported various disruptive demonstrations to try and achieve their stated aims, which I have described above and, based on what they have done and said since May 2024, including more recently, there is good reason to believe they will continue to do so. The police have been notified each time there have been occupations of Senate House Yard and Greenwich House by persons unknown although so far have not got involved.

135 **Senate House, Senate House Yard and The Old Schools:** Cambridge for Palestine have specifically targeted graduations, as shown by their previous social media posts

(see **paragraphs 42, 51 and 52**), having successfully disrupted graduations in May and November of last year. On 30 November 2024, upon leaving Senate House Yard, Cambridge for Palestine posted “We will be back”, under the tag line “We Will Not Stop. We Will Not Rest”.

- 136 There remains a real and imminent risk that the Defendants will continue to target graduations, forcing the University to relocate the events, including at short notice. There is a graduation ceremony scheduled to take place at Senate House on 1 March 2025. Whilst we are not sure of the exact numbers, there are expected to be 509 students who will graduate on 1 March 2025 along with 1255 guests across the day. After that, there are graduation ceremonies in Senate House on 29 March and 5 April; three graduations in May and seven in July (these dates are published on the University’s website (see **page 213**). In addition, the University’s annual Honorary Degree Congregation is scheduled to take place in Senate House on 25 June 2025 and the in person elections for the Chancellor on 12 and 16 July 2025.
- 137 The University has considered whether further measures should be taken to try and prevent the Defendants from entering Senate House, Senate House Yard and The Old Schools site. I have set out current security arrangements at **paragraphs 27** above.
- 138 A site visit was undertaken on the 9 January 2025 by Peter Hardy, Head of Security for the University, and members of the Estates team. This meeting was arranged to consider what mitigations could be put in place to deter further encampments on Senate House Yard. That review determined that there was little which could be done to stop trespass into the Senate House Yard. The metal fencing around the site was considered to be sufficient albeit it could be climbed over with ladders. Importantly, it was determined that both the Senate House and The Old School buildings were secure from a security perspective.
- 139 The possibility of placing CCTV in Senate House Yard was scoped as a deterrent, which could be provided from an office overlooking the yard. This recommendation is being considered although is yet to be approved. The Old Schools building and Senate House are also Grade 1 Listed so conservation status applies in terms of any security measures considered.

140 It is therefore difficult, in my view, to see what further measures would be appropriate. As this area is the ceremonial centre of the University, viewed by perhaps millions of tourists each year and attended by students and their families for graduations, I do not consider it would be appropriate from an aesthetic perspective to erect additional fencing to restrict access. Equally, as stated above, The Old Schools / Senate House Site is a Grade 1 Listed building and any further measures proposed would need to be carefully considered in line with the University’s responsibilities for these historic buildings.

141 **Greenwich House:** Greenwich House has a history for being targeted for occupations by protesters, as shown by the occupation in May 2018 by “Cambridge Zero Carbon Society”, referred to above, and the more recent occupation which started in November 2024. Cambridge for Palestine regards Greenwich House as “the administrative centre of Cambridge University” and the “financial core”. When the recent occupation of Greenwich House ended, Cambridge for Palestine posted on their social media (on 8 December 2024) (see **page 359**) the banner “*The university belongs to its students, and our movement will remain steadfast until justice is achieved*”, with the following statement:

“In the last two weeks, the administrative centre of a university complicit in genocide was reclaimed by the students. The building that houses the University’s finance department – bankrolling the murder of children – was adorned with Palestinian flags and renamed after a revolutionary martyr. The walls that conceal the layers of bureaucracy used to enact and preserve violence became a space for teach-ins and community gatherings”

142 I consider there is a real and imminent risk that Greenwich House will remain a target for further occupations, given what Greenwich House and/or its ‘reclamation by students’ appears to symbolise for the Defendants; the fact a further occupation will cause significant disruption to the University’s activities which the Defendants appear to see as a way of furthering their aims; and also given the commercially sensitive information which is stored there, which has been shown to be of interest to the Defendants through their activities during their occupation of gaining access to restricted areas of the building, opening locked cabinets and searching through cabinets (as I have described above).

143 Peter Hardy was asked to lead a review of the security arrangements for Greenwich House and to make recommendations on possible security enhancements (the findings

were reported to me on 23 January 2025). It was noted during the review that there were considerable security improvements undertaken following the last occupation of Greenwich House in May 2018. Under the current security arrangements, the building has extensive card access throughout on all external doors, several internal doors and including Divisional areas; there is an intruder alarm system throughout; there are also several external CCTV cameras together with internal cameras strategically placed on various entrances to the building.

- 144 Notwithstanding the current arrangements, the review made recommendations relating to improvements to the access systems, key management, fire activation, CCTV and maintenance access hatches. The main issue identified by the review, however, was the ease of access to the reception, foyer and cafe during normal working hours, which are easily accessible from the main entrance. This building operates like any other University buildings where access is unrestricted to reception areas, but has internal restrictions in place where required. The current main entrance doors allow for unlocking and locking for opening and closure during normal working hours. A further recommendation was for the doors to be fitted with electronic card access although this would also necessitate the installation of an intercom system and require careful building management by reception staff.
- 145 We are currently considering the recommendations of the review. I am conscious in particular that the measure relating to entrance doors would inhibit the free movement of people using the café and hinder general access arrangements to the building including deliveries and visitors, and would be out of keeping with the operation of most other University buildings.
- 146 **Ceasefire:** I consider that the risk of direct action by the Defendants at Senate House, Senate House Yard, The Old Schools and Greenwich House remains, notwithstanding the ceasefire between Israel and Hamas which was announced on 15 January 2025 and came into effect on 19 January 2025. Cambridge for Palestine remains active on social media and has implied on its social media platforms that the group will continue to disrupt University activities in the furtherance of its aims (set out below is its Facebook post on 18 January which can be found at **page 371**):

[18 January 2025 at 21:26]

"CEASEFIRE TODAY... LIBERATION TOMORROW..."

We commit to continuing the struggle from the belly of the beast, in unequivocal solidarity with the pursuit of a free Palestine, from the river to the sea."

147 Further, on 21 January 2025, Cambridge for Palestine posted the following message on Instagram (see **page 552**):

"As we honor the relief and joy of the steadfast people of Gaza, we recommit ourselves to the struggle against the complicity of our institutions, in pursuit of a free Palestine."

148 Further, the demands of Cambridge for Palestine naturally survive any temporary de-escalation of military action in Gaza. The group's aims are not just about ending current conflict but "ethical finance" and calling for the end of relationships between the University and certain third-party research and funding partners that the group alleges have financial and other connections with the military actions of Israel in the conflict in Gaza.

149 Through social media, Cambridge for Palestine has also recently shown its support for the occupation of Radcliffe Library, Oxford by Oxford Action for Palestine ("OA4P"), which started on 24 January 2025 and ended within 24 hours, following police intervention. I understand that a number of those arrested were not students. Cambridge for Palestine utilises the Instagram collaborate feature, allowing the group to co-author and reshare select OA4P social media posts to their own followers, including posts of which relate to the recent Radcliffe Library occupation.

150 OA4P appears to be a similar group to Cambridge for Palestine, said to be (as per their website) "a student-led collective joined by faculty, staff and the wider Oxford community, all of whom are dedicated to the liberation of Palestine" who "call on the University [of Oxford] to divest from and boycott Israel's criminal regime, end its complicity in scholasticide, and repair the injustices it perpetuates through a commitment to supporting Palestinian-led rebuilding of education in Gaza".

- 151 This occupation was reported in various news article, including The Oxford Student and BBC news (see articles at **pages 216 - 232**). The BBC news article (at **pages 233 - 235**) reported on the incident that:

OA4P said its efforts "must be redoubled" following this week's ceasefire after 15 months of war.

"To take our eyes off of Gaza now would be an abdication of our responsibility to the struggle for Palestinian liberation," the group added.

- 152 The endorsement of OA4P's action suggests Cambridge for Palestine may continue to take a similar approach. OA4P have similar aims to Cambridge for Palestine, as reported in the Oxford Student article referred to above, seeking the end of collaboration between companies said to be linked to the defence industry (such as BAE Systems and Rolls-Royce) and universities:

"The past 15 months have demonstrated the absolute brutality of the Zionist settler project. Lockheed Martin, a key weapons supplier to Israel, uses components supplied by BAE Systems and Rolls-Royce to manufacture their deadly F-35 fighter jets — technologies developed in collaboration with Oxford University. These three arms giants, among others, have provided Oxford with tens of millions of pounds in research funding. F-35s have been deployed by Israel across Palestine, Lebanon, Syria, Yemen, Iran, and Iraq, leading to the martyrdom of hundreds of thousands of Palestinians and their allies...

As Palestinians in Gaza are finally allowed a moment to breathe, grieve, return, and begin rebuilding their homes, mosques, churches, schools, and hospitals, our efforts must be redoubled. It is imperative to continue pressuring and disrupting the systems and powers that sustain the Zionist project. To take our eyes off of Gaza now would be an abdication of our responsibility to the struggle for Palestinian liberation."

(b) Irreparable harm

- 153 The application is necessary to protect the University's staff and students, its property, the interests of its research and funding partners, and the interests of the wider University community, from irreparable harm, which would be suffered if these protests were to continue unrestrained and/or if further encampments were to be established on the Land. The harm caused by these issues cannot be adequately compensated in money.

- 154 **Disruption to graduation ceremonies and adverse impact on the student experience:** I am particularly concerned about protecting students' ability to graduate in the proper way, that is, from Senate House. Significant concern has been raised by graduands, their guests and colleges following the recent disruption, including in November 2024. There has been pressure on all staff involved as a result of having to reorganise the graduations at short notice. Whilst there is a quantifiable cost to relocating the graduations to an alternative location, there is also an intangible, non-monetary harm suffered by the graduands and their families if the graduations do not take place in Senate House.
- 155 **Risk of unlawful dissemination or collection of confidential, commercially sensitive and/or personal information:** The University has an annual turnover from research grants in excess of £500m. It is an internationally renowned research university for biological sciences and technology. Its funding partners rely on the University for both its expertise and its ability to safeguard their interests and their confidential information. The publication or misuse of documents and information stored at Greenwich House and The Old Schools could have serious consequences for the University, which could include breach of contract claims against the University; the withdrawal of grant funding or termination of contracts; and reputational damage as a secure and professional research partner, which in turn could affect its ability to attract and retain the best academics. It could also affect the commercial interests of its partners.
- 156 **Operational disruption:** Further occupations may lead to the temporary relocation of staff who usually work in Greenwich House or The Old Schools, which would cause significant operational disruption to the University's administrative functions. As important administrative functions are carried out from these locations, the displacement of staff members could have a negative impact on the University meeting commercially important or regulatory deadlines.
- 157 I also wish to protect the ability of staff to work in our administrative buildings; they should have the assurance that they can attend their place of work and carry out their duties from these locations without disruption.
- 158 **Serious health and safety risks:** The occupation of these properties poses risks around health and safety, both to the Defendants themselves and members of the

University. As I have set out above, there were concerns about the welfare of the occupiers within Greenwich House during their recent occupation, as they were seen climbing on furniture. In a previous occupation of The Old Schools in March 2020 (as referred to in **paragraph 121** above) and the recent occupation of Greenwich House, the occupiers blockaded a number of entrances to and within the buildings, which posed an increased risk of fire-related injury. Efforts were made by the University to make the students aware of the fire risks but the University was unable to take any direct action as the students had locked themselves in to the properties.

159 The Land also comprises non-residential property, so there would be limited sanitation facilities available to the Defendants which poses an additional risk of their health.

160 **Other costs:** the University has incurred significant additional costs associated with security and cleaning as a result of these occupations. It has also incurred significant legal costs in seeking previous orders from the Court to remove occupations or restrain the dissemination of information, including the interim non-disclosure order obtained in December 2024 in relation to Greenwich House. More generally, there is considerable amount of time spent by staff, including senior members of the University, on each of these occupations which comes at a significant cost as they are diverted from their usual duties.

(XIII) Notifying the Defendants of the claim documents and any Order granted

161 The University proposes to notify the Defendants of the claim documents by:

161.1 Uploading a copy to the University's website at [Latest notices | University of Cambridge](https://www.cam.ac.uk/notices) (www.cam.ac.uk/notices);

161.2 Emailing the protest group known as Cambridge for Palestine (email addresses: encampmentnegotiations@proton.me and cambridge4palestine@proton.me and bloodonyourhands@systemli.org), stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above;

161.3 Affixing at least one notice in a prominent position on the main door to Greenwich House, the location of which is shown on the plan at **page 240** marked with an 'X', setting out where these documents can be found and obtained in hard copy;

- 161.4 Affixing a notice to the Senate House Yard Gates, Senate House Passage Gate, and the Archway, these locations being shown on the plan at **page 241** marked with an 'X', setting out where these documents can be found and obtained in hard copy.
- 162 The University proposes to notify the Defendants of any Order granted by:
- 162.1 Uploading a copy to the University's website at [Latest notices | University of Cambridge](https://www.cam.ac.uk/notices) (www.cam.ac.uk/notices);
- 162.2 Emailing a copy to the protest group known as Cambridge for Palestine (email addresses: encampmentnegotiations@proton.me, cambridge4palestine@proton.me and bloodonyourhands@systemli.org);
- 162.3 Affixing at least one copy of the Order in A4 size in a prominent position on the main door to Greenwich House;
- 162.4 Affixing a warning notice of A3 size in a prominent position on the main door to Greenwich House marked with an 'X' on the plan at **page 240**.
- 162.5 Affixing a copy of the Order in A4 size to the Senate House Yard Gates, Senate House Passage Gate, and the Archway, these locations being shown on the plan at **page 241** marked with an 'X', setting out where these documents can be found and obtained in hard copy;
- 162.6 Affixing warning notices of A4 size in close proximity to the Senate House Yard Gates, Senate House Passage Gate and Archway marked with an 'X' on the plan at **page 241**.
- 163 The University's action of seeking a precautionary injunction is also likely to attract press attention, which will raise awareness. For example, following the University's statement on 3 February 2024, the Varsity published an article on 7 February 2025 on this subject, (see **pages 236 – 239**).
- 164 I consider the steps proposed above should be sufficient to bring the application and any Order made to the attention of the Defendants. In particular, if one of the Defendants attends either site, once the Order is made, they are likely to see the warning notices

given they will be positioned at the main points of access. I also consider it is appropriate that the warning signs for The Old Schools / Senate House Site are A4 in size, given they will be situated on fences which surround iconic, historic buildings in a very prominent location in the centre of Cambridge, which is visited by millions of tourists each year. The University is mindful of its responsibility towards these buildings, and the need to preserve the sensitive environment in which they are located.

(XIV) Urgency

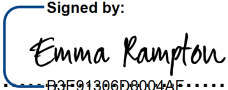
- 165 The reason we need a hearing listed before 1 March 2025 is because there is a graduation due to take place on 1 March 2025. Whilst we are not sure of the exact numbers, there are expected to be 509 students who graduate on this date along with 1255 guests across the day. I have set out above the reasons why I consider these students should be able to graduate at Senate House, and the adverse impact should they not be able to do so. There are also significant challenges and additional costs with relocating the graduations to alternative venues, given there are limited options within the University, and other options rely on the co-operation of third parties, such as colleges or Great St Mary's Church, and whilst they have been accommodating to date these cannot be relied upon going forward.
- 166 The University has waited until now to bring a claim for a precautionary injunction, rather than shortly after the occupation of Greenwich House, which ended on 6 December 2024, because:
- 166.1 It has been prioritising working on the interim non-disclosure order proceedings, which has been a substantial amount of work for the University's staff and resulted in significant legal fees;
- 166.2 Significant resources within the University have been diverted to dealing with this incident and assessing its aftermath;
- 166.3 The University has been waiting to see whether the threat of direct action remains following the ceasefire on 15 January 2025. For the reasons set out above, I consider the threat remains; and
- 166.4 There have been internal discussions within the University as to how to proceed. The University does not take this action lightly, but given the threat

posed to the graduation on 1 March 2025 (and others in the future) and the operation of key administrative buildings, I now consider this application is now necessary.

(XV) The University's undertakings

- 167 In the event that the Court is minded to grant a precautionary interim injunction, the University is prepared to give a cross-undertaking in damages should the Court later find that the injunction ought not to have been granted and this has caused loss to a Defendant in these proceedings which should be compensated. I confirm that I have the power and authority to provide this undertaking on behalf of the University should the Court require such an undertaking to be given.
- 168 The University's ability to meet any order made pursuant to a cross-undertaking in damages can be demonstrated by its financial review and statement for the year ending 31 July 2023 (which is available online).

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: 
Name: EMMA MACHTELD CLARA RAMPTON
Dated:14 February 2025.....