

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

BETWEEN:

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

Claimant

and

PERSONS UNKNOWN

Defendants

and

**EUROPEAN LEGAL SUPPORT
CENTER**

Intervener

**SUPPLEMENTAL HEARING BUNDLE
INDEX FOR HEARING ON 19 MARCH
2025**

Application(s) and draft Orders

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Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court The High Court of Justice, King’s Bench Division		Claim no. KB-2025-000497									
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)										
PBA 0087138	<table border="1"> <tr> <td>H</td> <td>W</td> <td>F</td> <td>-</td> <td></td> <td></td> <td>-</td> <td></td> <td></td> </tr> </table>		H	W	F	-			-		
H	W	F	-			-					
Warrant no. (if applicable)											
Claimant’s name (including ref.) The Chancellor, Masters, and Scholars of the University of Cambridge (CSMAW/00012000-1698)											
Defendant’s name (including ref.) PERSONS UNKNOWN (as described in the Claim Form)											
Date	13 March 2025										

1. What is your name or, if you are a legal representative, the name of your firm?

Mills & Reeve LLP

2. Are you a Claimant Defendant Legal Representative Other (please specify)

If you are a legal representative whom do you represent?

The claimant

3. What order are you asking the court to make and why?

The Claimant asks the Court for an Order (to the extent necessary pursuant to CPR 17.1(2) and/or CPR 19.4):

- (1) granting permission to the Claimant to amend the Claim Form and the Particulars of Claim to change the description of the Defendants to “Persons Unknown”, and making the consequential amendments in the amended statements of case appended hereto; and
- (2) dispensing with the requirements for notification or service of the amended Claim Form and amended Particulars of Claim, pursuant to CPR 6.16.

on the terms in the draft Order appended hereto.

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with? at a hearing without a hearing
 at a remote hearing

6. How long do you think the hearing will last? Is this time estimate agreed by all parties?
 Hours Minutes
 Yes No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

9. Who should be served with this application?

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

the attached witness statements

the statement of case

the evidence set out in the box below

If necessary, please continue on a separate sheet.

1. The original Claim Form defined the Defendants by reference to the conduct sought to be prohibited and a description of the category of individuals whom, the University believed, posed the real and imminent risk of carrying out that conduct. This was done as it followed the approach previously recommended in the relevant case law.
2. On 27 February 2025, at the first hearing of the Claimant’s application for injunctive relief, dated 12 February 2025, Fordham J preferred to adopt the approach used by Nicklin J in MBR Acres Ltd v Curtin [2025] EWHC 331 (19 February 2025) and define the Defendants more broadly – simply as “Persons Unknown”. Both these judgments are expressed to follow the Supreme Court judgment in Wolverhampton CC v London Gypsies & Travellers [2024] AC 983.
3. In light of the above, the Claimant makes this application protectively in case the Court: (a) wishes to follow the approach taken by Fordham J and Nicklin J; and, (b) considers it necessary that the description of the Defendants be formally amended to “Persons Unknown”. As such, I believe it is desirable to make this amendment so that the court can resolve the matters in dispute in the proceedings.
4. The Defendants are not, strictly, parties to the proceedings and so the provisions at CPR 17 and 19 may not technically apply. But those provisions have been followed, in substance, for the purposes of making this application.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

I understand that proceedings for contempt of court may be brought against a person 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.

I believe that the facts stated in section 10 (and any continuation sheets) are true.

The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



Applicant

Litigation friend (where applicant is a child or a Protected Party)

Applicant’s legal representative (as defined by CPR 2.3(1))

Date

Day: 13, Month: 3, Year: 2025

Full name

Samuel Maw

Name of applicant’s legal representative’s firm

Mills & Reeve LLP

If signing on behalf of firm or company give position or office held

Partner (Solicitor)

Signature and address details

Signed

Dated 13 March 2025

Applicant(~~’s legal representative~~)(~~’s litigation friend~~)

Position or office held _____ Partner (Solicitor) _____
(if signing on behalf of firm or company)

Applicant's address to which documents should be sent.

Building and street

Botanic House

Second line of address

100 Hills Road

Town or city

Cambridge

County (optional)

Cambridgeshire

Postcode

C | B | 2 | | 1 | P | H

If applicable

Phone number

-

Fax phone number

-

DX number

5210 Norwich

Your Ref.

CSMAW/00012000-1698

Email

Samuel.Maw@Mills-Reeve.com



Claim Form

You may be able to issue your claim online which may save time and money. Go to www.moneyclaims.service.gov.uk/make-claim to find out more.

In the High Court of Justice, Kings Bench Division

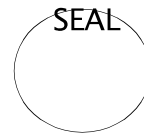
Fee Account no. PBA 0087138

Help with Fees - Ref no. (if applicable) **H W F** - -

	For court use only
Claim no.	<u>KB -2025-000497</u>
Issue date	

Amended Claim Form by Order of _____ dated _____

Claimant(s) name(s) and address(es) including postcode
 The Chancellor, Masters and Scholars of the University of Cambridge
 The Senate House, Kings Parade, Cambridge



Defendant(s) name and address(es) including postcode

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. *~~

Brief details of claim

The Claimant claims that the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon the Land (as defined in the Particulars of Claim), and / or block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land, and / or erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.

* The Claim Form does not show a full address, but the claimant will take the following steps:

- (1) Uploading a copy onto the following website: www.cam.ac.uk/notices.
- (2) Sending an email to cambridge4palestine@proton.me, encampmentnegotiations@proton.me and bloodonyourhands@systemli.org.
- (3) Affixing a notice at those locations marked with an "x" on Plan 1 and Plan 2 setting out where these documents can be found and obtained in hard copy.

Value

N/A

Defendant's name and address for service including postcode

As above.

Amount claimed	
Court fee	£626.00
Legal representative's costs	
Total amount	£626.00

For further details of the courts www.gov.uk/find-court-tribunal. When corresponding with the Court, please address the Court to the Court Manager and always quote the claim number.

Claim no.

You must indicate your preferred County Court Hearing Centre for hearings here
(see notes for guidance)

Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

- No

Does, or will, your claim include any issues under the Human Rights Act 1998?

- Yes
 No

Claim no.

Particulars of Claim

attached

to follow

Large empty rectangular box for entering particulars of claim.

Statement of truth

Note: you are reminded that a copy of this claim form must be served on all other parties.

I understand that proceedings for contempt of court may be brought against a person 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.

- I **believe** that the facts stated in this claim form and any attached sheets are true.
- The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature



- Claimant
- Litigation friend (where claimant is a child or protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

Full name

Name of claimant's legal representative's firm

If signing on behalf of firm or company give position or office held

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

Botanic House

Second line of address

100 Hills Road

Town or city

Cambridge

County (optional)

Cambridgeshire

Postcode

C	B	2		1	P	H
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If applicable

Phone number

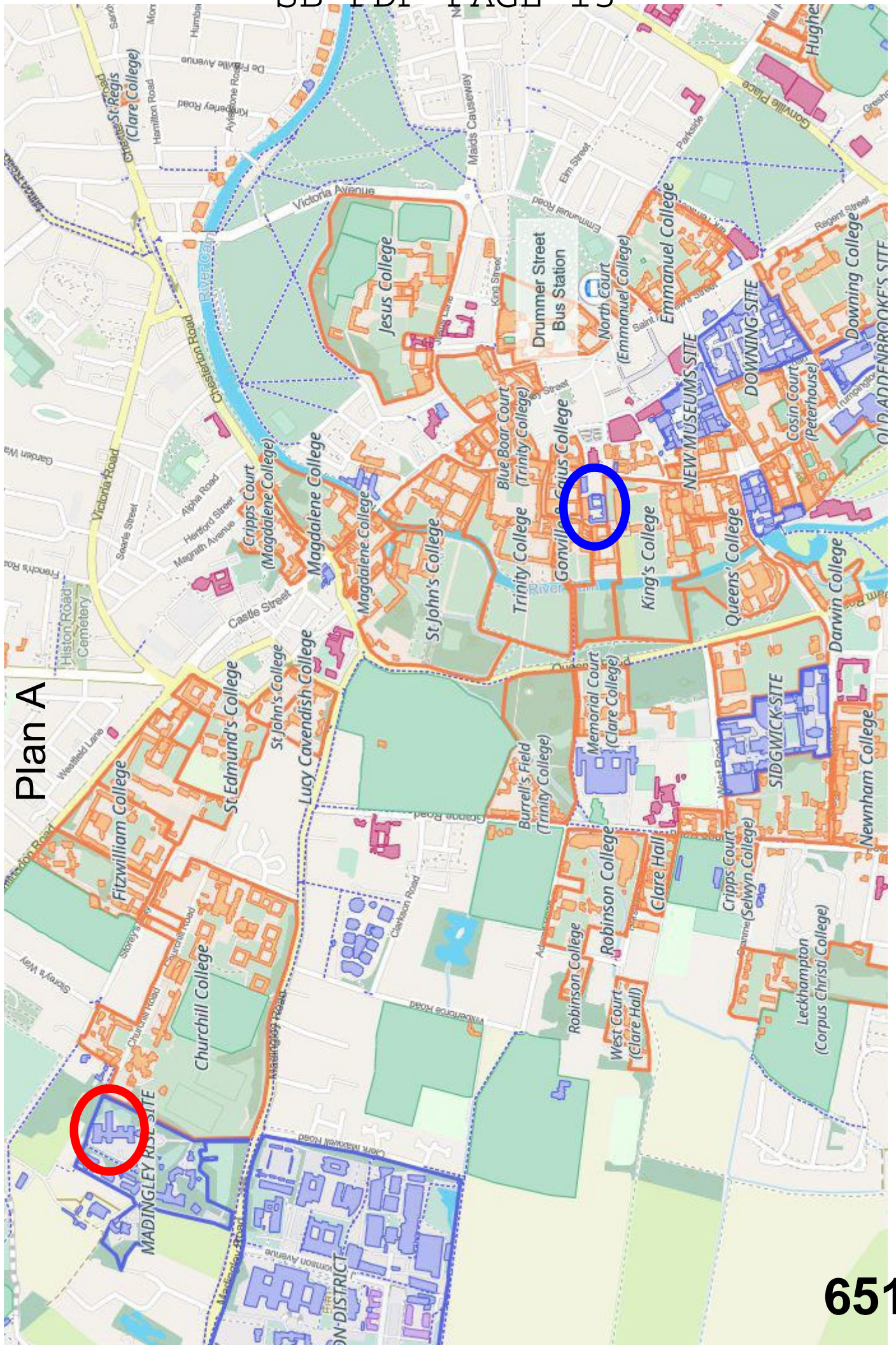
DX number

Your Ref.

CSMAW/00012000-1698

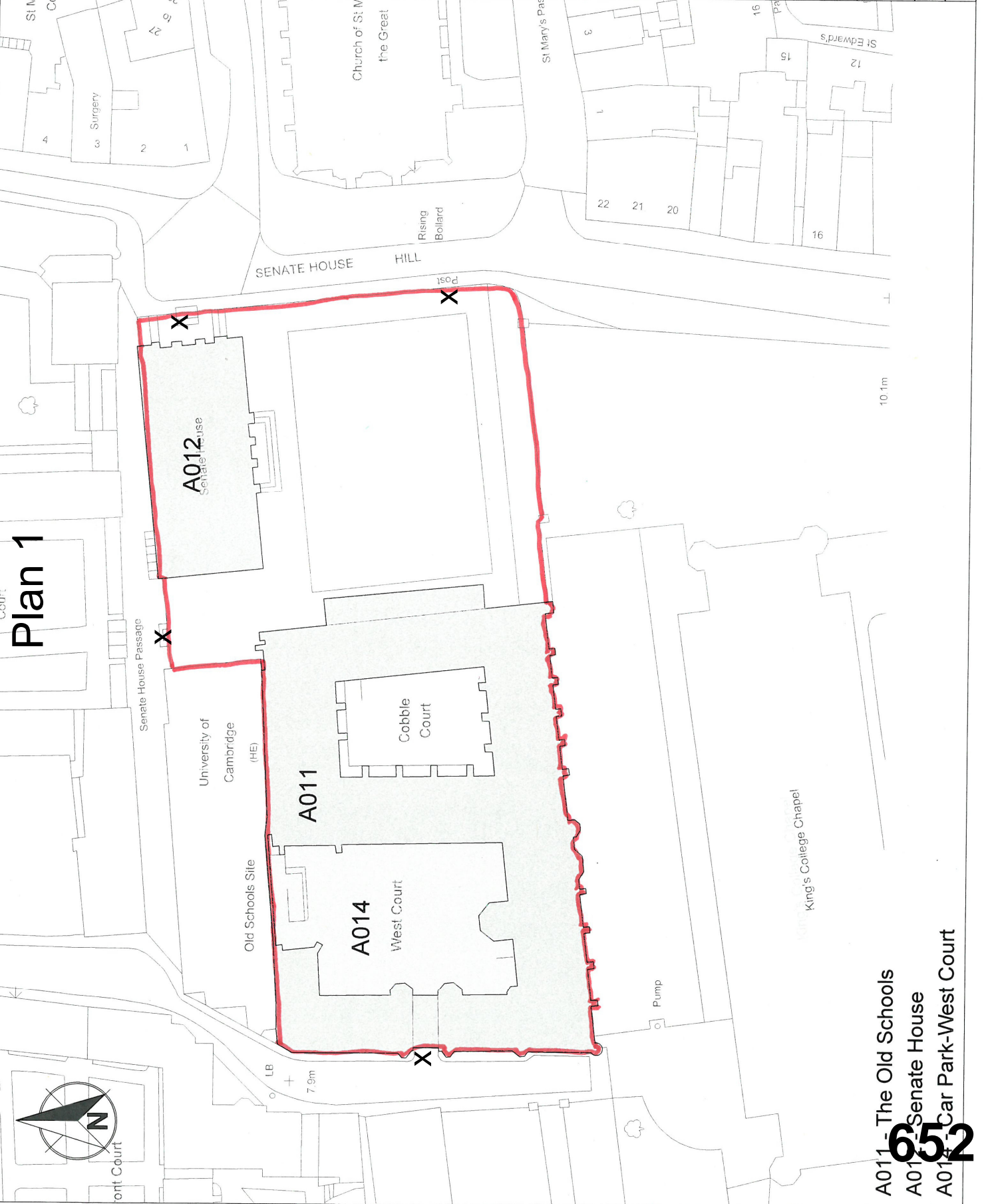
Email

Samuel.Maw@Mills-Reeve.com



Plan A

<p>1:250 1:1000 1:2000 1:5000 1:10000 1:20000 1:50000 1:100000 1:200000 1:500000 1:1000000</p> <p>This drawing has been prepared in accordance with the standards of the Institution of Civil Engineers (ICE) and the Institution of Structural Engineers (IStructE).</p> <p>Scale of A3 (Full Release)</p>	<p>UNIVERSITY OF CAMBRIDGE 74 Trumpington Street, Cambridge, CB1 2RU</p>	<p>Site Location A-Old Schools A-Old Schools</p>	<p>Document Status 1:1:250 Revision</p>
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- A011 - The Old Schools
- A012 - Senate House
- A014 - Car Park-West Court

652



Greenwich House, Cambridge CB3 0TX

Date	Revision History	Rev
17/08/2015	Description	A
		P01

Consultant Drawing Reference

Site Location

T-Site
XX-No Applicable Level
T-Maddingley Rise Site

Drawings Description

Site Location Plan
Site
As Built

Document Status and Submittal Description

1

Revision

Revision Description

P03 UNDER CHANGE

Scale @ A1

1:1000

Project/Building

Originator

Volume

Level

Type

Subj.

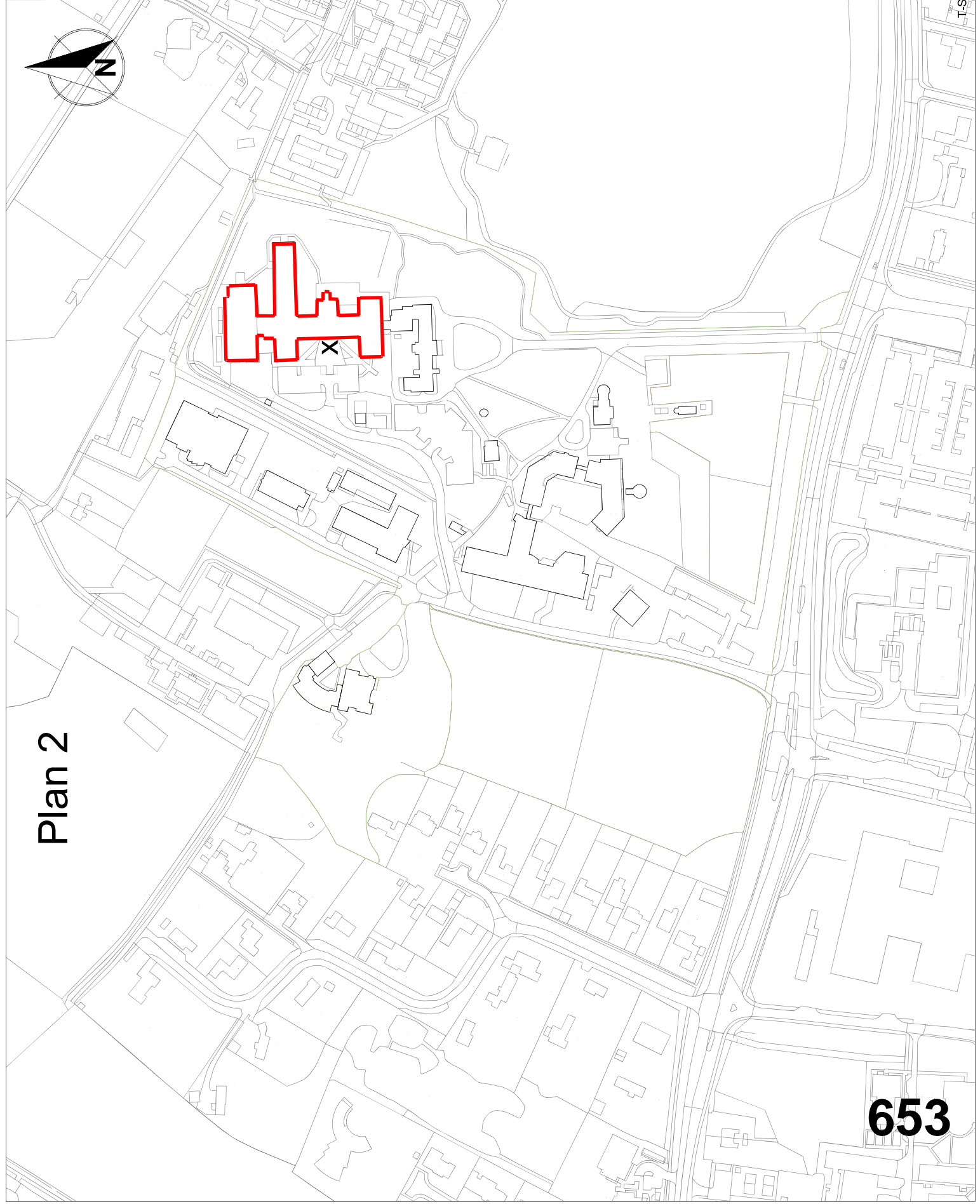
Number

T-Site-MiCAD-Maddingley Rise-Site Plan



Plan 2

653



IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION
BETWEEN:-

CLAIM NO:

CHANCELLOR, MASTERS AND SCHOLARS
OF THE UNIVERSITY OF CAMBRIDGE

Claimant

- v -

~~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):
GREENWICH HOUSE, MADINGLEY RISE, CAMBRIDGE, CB3 0TX
SENATE HOUSE AND SENATE HOUSE YARD, TRINITY STREET, CAMBRIDGE, CB2 1TA
THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN~~

Defendants

AMENDED PARTICULARS OF CLAIM
BY ORDER OF _____ DATED _____

I. INTRODUCTION

1. The Claimant (the "University") is a world-renowned university that was founded in 1209. It is frequently recognised as one of the top universities in the world. The University is made up of 31 colleges, which provide students with, amongst other things, pastoral and academic support, including undergraduate supervisions. This claim relates to land owned by the University only.

2. The Defendants are ~~comprised of~~ Persons Unknown. Those who are carrying out the direct action (who will be referred to in this statement of case to as the “Defendants” for convenience), ~~who~~ purport to be students of the University, protesting in relation to the Israel-Palestine conflict and the University’s alleged complicity in the actions of the Israeli Defence Force, such as by its investments in and research arrangements with the defence industry. Many of them appear to be affiliated with the group known as Cambridge for Palestine, whose stated aim (on its website ‘www.cambridge4palestine.org’) is as follows: *“We are a coalition standing against Cambridge University’s complicity in the genocide of and apartheid against Palestinians.”* This group, or individuals in some way affiliated with it, have previously carried out direct action at Greenwich House, in November 2024, and in Senate House Yard, in May and November 2024. As well as its website, Cambridge for Palestine also has a Twitter account (“@cam4palestine”), a Facebook account (“Cambridge for Palestine”) an Instagram account (“cambridgeforpalestine”) and a TikTok account (“cambridge4palestine”).
3. On its social media channels, Cambridge for Palestine sets out the following demands under the heading *“CAMBRIDGE ENCAMPMENT FOR PALESTINE: OUR DEMANDS”*:

“We will not move until the University of Cambridge agrees to:

- 1 Disclose financial and professional ties with complicit organisations
- 2 Divest funds and collaboration away from such organisations
- 3 Reinvest in Palestinian students, academics, and scholars
- 4 Protect students at risk and become a university of sanctuary”

II. LAND TO WHICH CLAIM RELATES

4. The land sought to be covered by the injunction comprises (the “**Land**”):
- 4.1 Greenwich House, Madingley Rise, Cambridge, CB3 0TX. This is an administrative office building accommodating approximately 500 of the University’s employees. It is home to several administrative departments of the

University, including: (i) the Estates Division; (ii) Research Services; (iii) Health, Safety and Regulated Facilities; (iv) Human Resources; and (v) the Finance Division. Physical records of confidential, sensitive and personal information are stored at Greenwich House.

- 4.2 Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA. This is the ceremonial and administrative heart of the University. It is where degree ceremonies are held and is the official meeting place of the Regent House and of the Senate.
- 4.3 The Old Schools, Trinity Lane, Cambridge, CB2 1TN. Situated next to Senate House and Senate House Yard and, with them, forming one enclosed site (albeit that the Old Schools is physically distinct), it 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. 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.
5. The University is the registered freehold proprietor of Greenwich House under title number CB337595.
6. The University is also the freehold proprietor of Senate House, Senate House Yard, and the Old Schools. Whilst currently unregistered, this land is pending first registration at Land Registry under title number CB489602. A statutory declaration of Richard Griffin, dated 3 September 2024, confirms:

“That to the best of my knowledge information and belief the University is the freehold owner of the land shown edged red.

That to the best of my knowledge information and belief the said Chancellor Masters and Scholars for the time being of the University have been for the past

seventy-five years and upwards in the free and uninterrupted possession and enjoyment of or in receipt of the rents and profits of the Property without any adverse claim and that they are now seized in fee simple in possession of the Property.”

7. The location of the Land is shown on Plan A attached to the Claim Form. The precise extent of the Land is set out on Plan 1 and Plan 2 attached to the Claim Form.

III. DIRECT ACTION ON THE LAND

8. Based on the statements made by the Defendants and their previous actions, the University believes that there is a real and imminent risk of the Defendants carrying out further direct action on the Land.
9. The Defendants have previously carried out direct action on the Land. In particular:
 - 9.1 On 15 May 2024, the Defendants set up an encampment on Senate House Yard. They remained there until 16 May 2024 and, in doing so, forced the University to move its graduation ceremonies to another location.
 - 9.2 On 22 November 2024, the Defendants gained access to, and barricaded themselves within, Greenwich House, blocking the entrances and exits to University staff. They remained there until 6 December 2024 and, whilst in the building, gained access to restricted areas and confidential and commercially sensitive information. This necessitated the University bringing proceedings to prohibit the dissemination of confidential information obtained within the building.
 - 9.3 On 27 November 2024, the Defendants again set up an encampment on Senate House Yard. They remained there until 30 November 2024 and, in doing so, forced the University to move its graduation ceremonies to another location.

10. The Defendants have not indicated any intention to desist from carrying out this sort of direct action in the future. Their social media channels remain active and the demands posted on those channels remain the same as before.
11. Rather, statements published by the Defendants suggest that they intend to repeat their acts of direct action. For example, on 30 November 2024, after the Defendants had left Senate House Yard, Cambridge for Palestine published a post on social media stating, "*We will be back*", under the tag line "*We Will Not Stop. We Will Not Rest*". Similarly, even after the ceasefire between Israel and Hamas was announced on 15 January 2025, Cambridge for Palestine announced the following on its social media channels on 18 January 2025:

"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."

12. Further, on 21 January 2025, Cambridge for Palestine posted the following message on Instagram:

"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."
13. Moreover, Cambridge for Palestine recently endorsed the occupation of the Radcliffe Library in Oxford University by Oxford Action for Palestine, which commenced on 24 January 2025 and was ended by police intervention within 24 hours. A number of the individuals arrested were not students of Oxford University.

IV. CAUSES OF ACTION

14. The Claimant apprehends that, unless restrained by the Court, the Defendants will carry out acts amounting to trespass and nuisance on the Land.

15. In relation to trespass, students and members of the public may not, without the University's express consent: (1) enter, occupy or remain upon the Land; (2) block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land; or, (3) erect or place any structure (including, for example, tents or other sleeping equipment) on the Land, for the purpose of carrying out a protest, or taking part in any demonstration, public assembly or encampment.
16. No member of the public has, generally, been granted a licence to be on the Land or carry out these acts.
17. Although students of the University have a licence to enter some of the University's land for certain purposes, this does not extend to the actions referred to above on the Land. This is because:
 - 17.1. No student has a general licence to enter Greenwich House, Senate House or the Old Schools. These areas are not generally accessible to students without the University's consent.
 - 17.2. In respect of Senate House Yard, whilst not a student space, it is generally open to students insofar as one of its gates is open and there is no event taking place there but even then only for certain purposes. However:
 - 17.2.1 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.
 - 17.2.2 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

..."

17.2.3 By the Code, Rule 6.7 provides that *"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"*. The Annex states:

"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."

18. Direct action on the Land by the Defendants would amount to a breach of paragraphs 1(a), 1(d), 2(a) and 2(b) of the Rules of Behaviour as well as A.3 of the Code.

19. Consequently, the Defendants would have no licence and would be committing a trespass if they were, for the purpose of carrying out a protest or taking part in any demonstration, public assembly or encampment: (1) to enter, occupy or remain upon the Land; (2) to block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land; or, (3) to erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.
20. In relation to nuisance, the threatened acts referred to at §§8-13 above would also amount to an undue and substantial interference with the Claimant's enjoyment of the Land.

V. RELIEF SOUGHT

21. In light of the above, the Claimant seeks injunctive relief to prevent the apprehended trespasses and nuisance.

VI. IDENTITIES OF THE DEFENDANTS

22. The Claimant is not aware of the identities of specific individuals who are planning to carry out direct action on the Land. This is because such direct action has not yet occurred. Even once it occurs, the Claimant would likely be unable to identify the participating individuals unless their details were provided by the police following arrest.

VII. SERVICE/NOTIFICATION

23. Pursuant to *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claimants are not able to serve Persons Unknown. Rather, the Claimants propose to notify Persons Unknown of the Claim Form, the Application Notice and evidence in support by taking the following steps:

23.1. Uploading a copy onto the following website: www.cam.ac.uk/notices.

- 23.2. Sending an email to cambridge4palestine@proton.me, encampmentnegotiations@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.
- 23.3. Affixing a notice at those locations marked with an “x” on Plan 1 and Plan 2 setting out where these documents can be found and obtained in hard copy.

VIII. HUMAN RIGHTS

24. The rights protected by Articles 10 and 11 ECHR (rights to freedom of expression and assembly) do not provide a defence to this claim. This is because Articles 10 and 11 ECHR include no right to trespass on private property and thereby override the rights of private landowners: *DPP v Cuciurean* [2022] 3 WLR 446 (DC), §§40-50; *Ineos Upstream v Persons Unknown* [2019] 4 WLR 100 (CA), §36 (Longmore LJ).
25. Even if it were found that an injunction would amount to an interference with the Defendants’ Article 10/11 ECHR rights by a public authority, any such interference would be justified in that:
- 25.1. The University has the legitimate aim of vindicating its own property rights and carrying out lawful activities on its land, thereby protecting the interests of its students and staff.
- 25.2. There is a rational connection between obtaining an injunction and furthering those legitimate aims.
- 25.3. There are no less restrictive alternative means available to achieve the aims.
- 25.4. An injunction would represent a fair balance between the competing rights. In particular:

- 25.4.1. The nature of the direct action is such as to exclude the use of the Land by the Claimant and all others who have a lawful right to be there.
- 25.4.2. Direct action, by which the Defendants are seeking to compel others to act in a certain way, rather than persuade them, is not at the core of Article 10/11 ECHR rights.
- 25.4.3. The Defendants have no licence or other right to carry out the direct action.
- 25.4.4. The Defendants have now carried out direct action on the Land on three separate occasions at great disruption to the University, the Colleges, staff, students and the guests of students.
- 25.4.5. There is no connection between the Land and the substance of the Defendants' protest.
- 25.4.6. The Defendants are able to protest at other locations without causing significant disruption to the University, its staff and students.

AND THE CLAIMANT CLAIMS

- (1) An order that until 12 February 2030 the Defendants must not, without the consent of the Claimant:
 - a. Enter, occupy or remain upon the Land.
 - b. Block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land.
 - c. Erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.
- (2) Costs; and,

(3) Further and/or other relief.

YAASER VANDERMAN

Brick Court Chambers

STATEMENT OF TRUTH

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:

A handwritten signature in blue ink, appearing to read 'Yasir Vanderman', is enclosed in a light blue rectangular box.

13.3.2025

Dated:

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

BETWEEN:-

THE CHANCELLOR, MASTERS AND SCHOLARS
OF THE UNIVERSITY OF CAMBRIDGE

Claimant

- v -

PERSONS UNKNOWN

Defendants

- and -

THE EUROPEAN LEGAL SUPPORT CENTRE

Intervener

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimant's claim by Claim Form, dated 12 February 2025, and its application for an injunction, dated 12 February 2025 (the "**Application**")

AND UPON Mr Justice Fordham hearing the Claimant's Application on 27 February 2025

AND UPON the Order of Mr Justice Fordham, dated 27 February, granting the Claimant interim injunctive relief until 23:00 on 1 March 2025 (the "**27 February Order**") in relation to part of the Land but otherwise adjourning the Application for further consideration at a return hearing

AND UPON hearing the Claimant's application of 13 March 2025 to amend the description of the Defendants to "Persons Unknown"

AND UPON hearing Counsel for the Claimant and Counsel for the European Legal Support Centre on 19 March 2025

AND UPON the Claimant giving and the Court accepting the undertaking set out in Schedule 2 to this Order

AND UPON the "Land" being defined as (a) Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA; (b) The Old Schools, Trinity Lane, Cambridge, CB2 1TN; and, (c) Greenwich House, Madingley Rise, Cambridge, CB3 0TX, as shown for identification edged red on the attached Plan 1 and Plan 2 in Schedule 1

AND UPON paragraphs 9 - 11 of this Order being pursuant to the guidance in Wolverhampton CC v London Gypsies & Travellers [2023] UKSC 47

IT IS ORDERED THAT:

PERSONS UNKNOWN

1. The description of the Defendants in the Claim Form and Particulars of Claim is amended to “Persons Unknown”. Permission is granted to amend the Claim Form and Particulars of Claim to reflect this change in description.

INJUNCTION

2. Until 23:00 on 26 July 2025 or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon the Land.
3. Until 23:00 on 26 July 2025 or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, directly block the access of any individual to the Land with the intention of stopping that individual accessing the Land.
4. Until 23:00 on 26 July 2025 or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.
5. In respect of paragraphs 2-4, the Defendants must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

VARIATION

6. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person.
7. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
8. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

9. This Order shall be notified to Persons Unknown by the Claimant carrying out each of the following steps:
 - a. Uploading a copy of the Order onto the following website: www.cam.ac.uk/notices.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
 - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an “x” on Plan 1 and Plan 2 in Schedule 1.
 - d. Affixing warning notices of A4 size at those locations marked with an “x” on Plan 1 and Plan 2 in Schedule 1.
10. Notification to Persons Unknown of any further applications shall be effected by the Claimant carrying out each of the following steps:
 - a. Uploading a copy of the Order onto the following website: www.cam.ac.uk/notices.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
 - c. Affixing a notice at those locations marked with an “x” on Plan 1 and Plan 2 in Schedule 1 stating that the application has been made and where it can be accessed in hard copy and online.
11. Notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.
12. In respect of paragraphs 9-11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

14. Any contempt application against any Person Unknown may only be brought with the permission of the Court.
15. Liberty to apply.
16. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANT

17. The Claimant's solicitors and their contact details are:

Mills & Reeve LLP, Botanic House, 100 Hills Rd, Cambridge, CB2 1PH

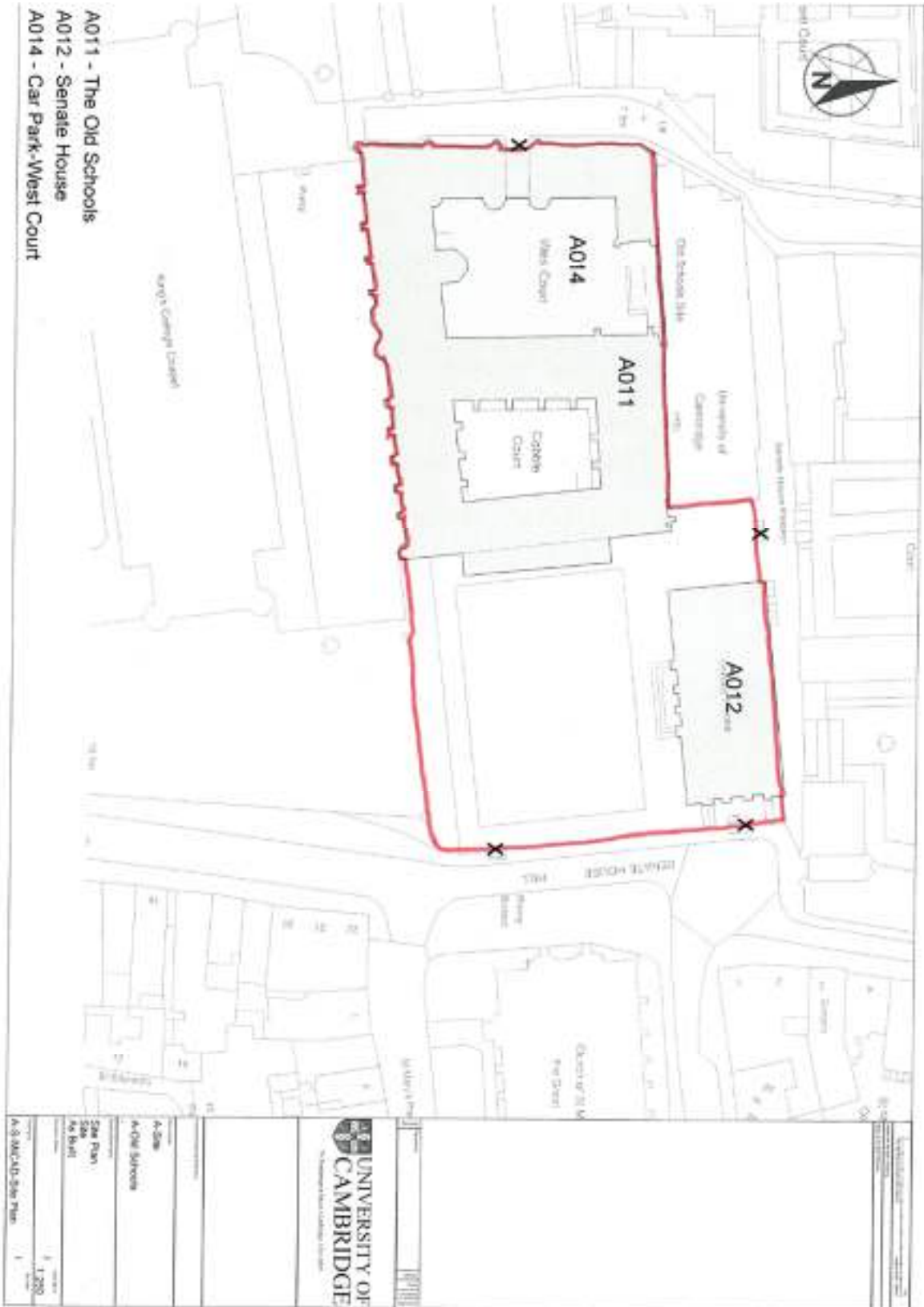
Ref: 0001200-1698

Email address: millsreeve100@mills-reeve.com

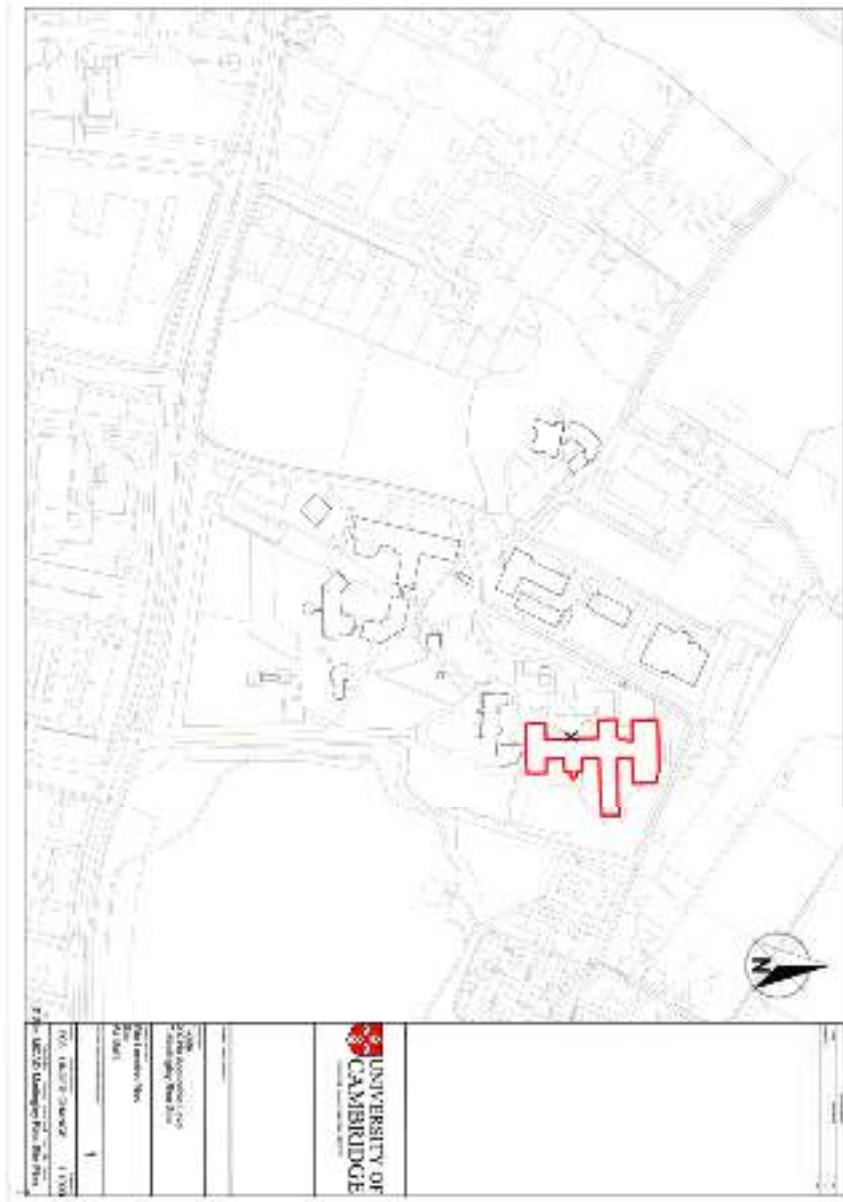
Dated: [] March 2025

SCHEDULE 1 - PLANS

Plan 1



[Plan 2]



SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANT

The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunctions in paragraphs 2-4 of this Order have caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 - EMAIL ADDRESSES

- cambridge4palestine@proton.me
- encampmentnegotiations@proton.me
- bloodonyourhands@systemli.org

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

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
SAMUEL MAW

I, Samuel Joseph Maw, solicitor at Mills & Reeve LLP, Botanic House, 100 Hills Rd, Cambridge CB2 1PH, will say as follows:

- 1 I make this statement in support of the Claimant's application for a precautionary injunction. I am the solicitor with conduct of this matter on behalf of the Claimant (hereinafter referred to as "the University") and confirm that I am duly authorised to make this witness


statement on behalf of the University. The purpose of this statement is to confirm the steps which the University has taken to notify the Defendants of the claim documents and associated application (as set out in paragraph 161 of Emma Rampton's first witness statement of 14 February 2025).

- 2 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.
- 3 There is now produced and shown to me a bundle of documents marked "SM1" to which I refer to in this witness statement. References to page numbers are to pages of "SM1".
- 4 On 19 February 2025, a copy of the Claim Form, Particulars of Claim, Application Notice and evidence in support were uploaded to the University's website as shown by the webpage at page 1 of the exhibit.
- 5 On 19 February 2025, emails were sent to each of the known email addresses for Cambridge for Palestine, as shown at pages 2 to 3 stating that a claim had been brought and an application had been made, leading to the listing of a hearing on 27 February 2025, and stating where the Claim Form, Particulars of Claim, Application Notice and evidence in support can be found. The email also informed Cambridge for Palestine that a hearing had been listed for 3 hours on 27 February 2025 at the Royal Courts of Justice. Copies of the emails can be found at pages 2 to 3.
- 6 On 19 February 2025, a notice was affixed on a prominent position on the main door to Greenwich House (at the location shown on the plan at page 240 of ER1 marked with an 'X'), which set out where the Claim documents and associated application can be found and obtained, including in hard copy, and informing the Defendants that a hearing had been listed for 3 hours on 27 February 2025 at the Royal Courts of Justice. A copy of the witness statement from the process server who was instructed to affix these notices can be found at pages 4 to 8 along with photos taken of the notice in position at pages 9 to 10.
- 7 On 19 February 2025, a notice was affixed to the Senate House Yard Gates, Senate House Passage Gate, and the Archway, at the locations shown on the plan at page 241 of ER1

marked with an 'X', which set out where the Claim documents and associated application can be found and obtained, including in hard copy, and informing the Defendants that a hearing had been listed for 3 hours on 27 February 2025 at the Royal Courts of Justice. A copy of the witness statement from the process server who was instructed to fix these notices can be found at pages 4 to 8 along with photos taken of the notices in position at pages 11 to 17.

8 The hearing has also attracted press attention, as shown by the articles in Varsity, the Times and The Telegraph, which can be found at pages 18 to 29.

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: SAMUEL JOSEPH MAW

Dated: **24.2.2025**

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

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
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0TX
- (B) SENATE HOUSE AND SENATE
HOUSE YARD, TRINITY STREET,
CAMBRIDGE, CB2 1TA
- (C) THE OLD SCHOOLS, TRINITY
LANE, CAMBRIDGE, CB2 1TN

Defendants

EXHIBIT SM1

Claim Form, Particulars of Claim and associated application in connection with the University's claim for a precautionary injunction to restrain trespass at The Old Schools / Senate House Site and Greenwich House to be heard on 27 February 2025

Last updated: 19 Feb 2025

Claim Form, Particulars of Claim and associated application in connection with the University's claim for a precautionary injunction to restrain trespass at The Old Schools / Senate House Site and Greenwich House to be heard on 27 February 2025.

To view the Claim Form, Particulars of Claim and associated application, please follow the links below:

- [Claim Form \(https://www.cam.ac.uk/sites/default/files/sealed_claim_form_-_13.02.2025753121937.1.pdf\)](https://www.cam.ac.uk/sites/default/files/sealed_claim_form_-_13.02.2025753121937.1.pdf)
- [Particulars of Claim \(https://www.cam.ac.uk/sites/default/files/particulars_of_claim_-_12.02.2025753049426.1.pdf\)](https://www.cam.ac.uk/sites/default/files/particulars_of_claim_-_12.02.2025753049426.1.pdf)
- [Application Notice including draft Order \(https://www.cam.ac.uk/sites/default/files/application_notice_and_draft_order.pdf\)](https://www.cam.ac.uk/sites/default/files/application_notice_and_draft_order.pdf)
- [Emma Rampton Witness Statement \(https://www.cam.ac.uk/sites/default/files/er_witness_statement_14.02.2025753117325.1.pdf\)](https://www.cam.ac.uk/sites/default/files/er_witness_statement_14.02.2025753117325.1.pdf)
- [ER Witness Statement Exhibits \(https://www.cam.ac.uk/system/files/exhibit_er1_12.02.2025.pdf\)](https://www.cam.ac.uk/system/files/exhibit_er1_12.02.2025.pdf)

To view the response pack, please follow the links below:

- [Guidance for defendants replying to the claim form N1C \(https://www.cam.ac.uk/sites/default/files/guidance_for_defendants_replying_to_the_claim_form_n1c_-_gov.uk_1.pdf\)](https://www.cam.ac.uk/sites/default/files/guidance_for_defendants_replying_to_the_claim_form_n1c_-_gov.uk_1.pdf)
- [N9 Response pack \(https://www.cam.ac.uk/sites/default/files/n9_response_pack_1.pdf\)](https://www.cam.ac.uk/sites/default/files/n9_response_pack_1.pdf)
- [N9C Admissions \(https://www.cam.ac.uk/sites/default/files/n9c_admission_1.pdf\)](https://www.cam.ac.uk/sites/default/files/n9c_admission_1.pdf)
- [N9D Defence and Counterclaim \(https://www.cam.ac.uk/sites/default/files/n9d_1.pdf\)](https://www.cam.ac.uk/sites/default/files/n9d_1.pdf)



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From: MillsReeve100
Sent: 19 February 2025 09:43
To: encampmentnegotiations@proton.me
Cc: Emma Rampton
Subject: KB-2025-000497 - Greenwich House and The Old Schools / Senate House Site [M&R-CLIENTDMS.FID3724486]
Attachments: Sealed Claim form - 13.02.2025(753121937.1).pdf; Particulars of Claim - 12.02.2025(753049426.1).pdf; Application notice and Draft Order 12.02.2025.pdf

To Members of Cambridge for Palestine

KB-2025-000497

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

-v-

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**

We write in connection with the above proceedings.

We act for the Claimant. The Claimant has issued a claim in the High Court for a precautionary injunction to restrain trespass at Greenwich House and The Old Schools / Senate House Site – please find attached the Claim Form, Particulars of Claim and associated application.

Following the application a hearing has been listed for 3 hours on 27 February 2025 at the High Court, King's Bench Division, Royal Courts of Justice, Strand, London, WC2A 2LL.

The Claim Form, Particulars and application are attached, and these and other supporting documents including witness statement and response pack can be found on the Claimant's website: [Claim Form, Particulars of Claim and associated application in connection with the University's claim for a precautionary injunction to restrain trespass at The Old Schools / Senate House Site and Greenwich House to be heard on 27 February 2025 | University of Cambridge](#)

Yours faithfully

Mills & Reeve LLP

From: MillsReeve100
Sent: 19 February 2025 09:46
To: cambridge4palestine@proton.me; bloodonyourhands@systemli.org
Cc: Emma Rampton
Subject: KB-2025-000497 - Greenwich House and The Old Schools / Senate House Site [M&R-CLIENTDMS.FID3724486]
Attachments: Sealed Claim form - 13.02.2025(753121937.1).pdf; Particulars of Claim - 12.02.2025(753049426.1).pdf; Application notice and Draft Order 12.02.2025.pdf

To Members of Cambridge for Palestine

KB-2025-000497

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

-v-

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**
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- (C) THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN**

We write in connection with the above proceedings.

We act for the Claimant. The Claimant has issued a claim in the High Court for a precautionary injunction to restrain trespass at Greenwich House and The Old Schools / Senate House Site – please find attached the Claim Form, Particulars of Claim and associated application.

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The Claim Form, Particulars and application are attached, and these and other supporting documents including witness statement and response pack can be found on the Claimant's website: [Claim Form, Particulars of Claim and associated application in connection with the University's claim for a precautionary injunction to restrain trespass at The Old Schools / Senate House Site and Greenwich House to be heard on 27 February 2025 | University of Cambridge](#)

Yours faithfully

Mills & Reeve LLP

Statement on behalf of the Applicant
Deponent: Mark
Parker
First Statement
Exhibits: 'A' Dated: As
Dated

Claim No:
KB-2025-000497

BETWEEN

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

Applicant

-v-

PERSONS UNKOWN

Respondent

STATEMENT OF PROCESS SERVER


I, Mark Parker, of Elite Enforcement Services Ltd, Fulford House, Newbold Terrace, Leamington Spa, Warwickshire, CV32 4EA, and for the purpose of this service instructed by Mills & Reeve Solicitors LLP, Botanic House, 100 Hills Rd, Cambridge CB2 1PH – Solicitors for the applicant.

State as follows:

- 1) That except where otherwise stated to the contrary this statement is made of my own knowledge of the matters referred to.
- 2) Copies of the following documents were served on Persons Unkown at 08:50hrs on Wednesday 19 February 2025 at the following locations :Greenwich House, Madingley Rise, Cambridge, CB3 OTX, Senate House, Trinity Street, Cambridge, CB2 1TA, Senate Yard, Trinity Street, Cambridge, CB2 1TA and Old Schools, Trinity Lane, Cambridge, CB2 1TN, by attaching notices to gates / railings in clear document holders :-
 - a) "Notices of hearing dated for 27 February 2025"
- 3) That there is now produced and shown to be marked 'A' and marked 'B' copies of the said documents so served by me.

STATEMENT OF TRUTH

I believe the facts contained in this Certificate 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: 
Printed: Mark Parker

Date: 19
February
2025

681

Statement on behalf of the Applicant
Deponent: Mark
Parker
First Statement
Exhibits: 'A' Dated: As
Dated

Claim No:
KB-2025-000497

BETWEEN

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

Applicant

-v-

PERSONS UNKNOWN

Respondent

EXHIBIT A

This is Exhibit A referred to in the Statement of Mark Parker.

IMPORTANT NOTICE – HEARING ON 27 FEBRUARY 2025

FROM: THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE (“THE UNIVERSITY”)

TO: 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) (“PERSONS UNKNOWN”) ON, THE FOLLOWING SITES:

- (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, TOGETHER (“THE LAND”)

ON 12 FEBRUARY 2025, A CLAIM WAS ISSUED BY THE UNIVERSITY IN THE HIGH COURT OF JUSTICE SEEKING AN ORDER PROHIBITING PERSONS UNKNOWN FROM ENTERING, OCCUPYING OR REMAINING UPON THE LAND, AND/OR BLOCKING, PREVENTING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH ACCESS TO ANY OTHER INDIVIDUAL TO THE LAND AND/OR (III) ERECTING OR PLACING ANY STRUCTURE (INCLUDING TENTS) ON THE LAND.

A HEARING HAS BEEN LISTED FOR 3 HOURS ON 27 FEBRUARY 2025 AT THE ROYAL COURTS OF JUSTICE, STRAND, LONDON, WC2A 2LL, AT WHICH THE UNIVERSITY’S CLAIM WILL BE HEARD ON AN INTERIM BASIS.

A COPY OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION, INCLUDING PLANS OF THE LAND, CAN BE OBTAINED FROM THE FOLLOWING WEBSITE:
WWW.CAM.AC.UK/NOTICES.

HARD COPIES OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION MAY BE OBTAINED FROM THE RECEPTION OF THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN, WITHIN NORMAL WORKING HOURS. TO ARRANGE FOR COLLECTION, PLEASE EMAIL:
CLAIMDOCUMENTSREQUEST@ADMIN.CAM.AC.UK.

Statement on behalf of the Applicant
Deponent: Mark
Parker
First Statement
Exhibits: 'A' Dated: As
Dated

Claim No:
KB-2025-000497

BETWEEN

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

Applicant

-v-

PERSONS UNKNOWN

Respondent

EXHIBIT B

This is Exhibit B referred to in the Statement of Mark Parker.

IMPORTANT NOTICE – HEARING ON 27 FEBRUARY 2025

FROM: THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE (“THE UNIVERSITY”)

TO: 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) (“PERSONS UNKNOWN”) ON, THE FOLLOWING SITES:

- (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, TOGETHER (“THE LAND”)

ON 12 FEBRUARY 2025, A CLAIM WAS ISSUED BY THE UNIVERSITY IN THE HIGH COURT OF JUSTICE SEEKING AN ORDER PROHIBITING PERSONS UNKNOWN FROM ENTERING, OCCUPYING OR REMAINING UPON THE LAND, AND/OR BLOCKING, PREVENTING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH ACCESS TO ANY OTHER INDIVIDUAL TO THE LAND AND/OR (III) ERECTING OR PLACING ANY STRUCTURE (INCLUDING TENTS) ON THE LAND.

A HEARING HAS BEEN LISTED FOR 3 HOURS ON 27 FEBRUARY 2025 AT THE ROYAL COURTS OF JUSTICE, STRAND, LONDON, WC2A 2LL, AT WHICH THE UNIVERSITY’S CLAIM WILL BE HEARD ON AN INTERIM BASIS.

A COPY OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION, INCLUDING PLANS OF THE LAND, CAN BE OBTAINED FROM THE FOLLOWING WEBSITE: WWW.CAM.AC.UK/NOTICES.

HARD COPIES OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION MAY BE OBTAINED FROM THE RECEPTION OF THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN, WITHIN NORMAL WORKING HOURS. TO ARRANGE FOR COLLECTION, PLEASE EMAIL: CLAIMDOCUMENTSREQUEST@ADMIN.CAM.AC.UK.

RISE Resistance, Revolution, Abolition

HIGH COURT OF JUSTICE CLAIM NO - KB-2025-000497

**IMPORTANT NOTICE –
HEARING ON 27 FEBRUARY
2025**

FROM: THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE ("THE UNIVERSITY")

TO: 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) ("PERSONS UNKNOWN") ON, THE FOLLOWING SITES:

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

ON 12 FEBRUARY 2025, A CLAIM WAS ISSUED BY THE UNIVERSITY IN THE HIGH COURT OF JUSTICE SEEKING AN ORDER PROHIBITING PERSONS UNKNOWN FROM ENTERING, OCCUPYING OR REMAINING UPON THE LAND, AND/OR BLOCKING, PREVENTING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH ACCESS TO ANY OTHER INDIVIDUAL TO THE LAND AND/OR (iii) ERECTING OR PLACING ANY STRUCTURE (INCLUDING TENTS) ON THE LAND.

A HEARING HAS BEEN LISTED FOR 3 HOURS ON 27 FEBRUARY 2025 AT THE ROYAL COURTS OF JUSTICE, STRAND, LONDON, WC2A 2LL, AT WHICH THE UNIVERSITY'S CLAIM WILL BE HEARD ON AN INTERIM BASIS.

A COPY OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION, INCLUDING PLANS OF THE LAND, CAN BE OBTAINED FROM THE FOLLOWING WEBSITE: WWW.CAM.AC.UK/NOTICES.

HARD COPIES OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION MAY BE OBTAINED FROM THE RECEPTION OF THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN, WITHIN NORMAL WORKING HOURS. TO ARRANGE FOR COLLECTION, PLEASE EMAIL: CLAIMDOCUMENTSREQUEST@ADMIN.CAM.AC.UK.

**IMPORTANT NOTICE
HIGH COURT OF JUSTICE
CLAIM NO - KB-2024-001755
14 FEBRUARY 2025**

FROM: THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE (THE "CLAIMANT")

TO: PERSONS UNKNOWN WHO ARE OCCUPYING GREENWICH HOUSE AND HAVE ACCESSED AREAS WITHIN GREENWICH HOUSE WHERE CONFIDENTIAL INFORMATION IS HELD AND THREATENING OR INTENDING TO RELEASE THE INFORMATION THEREBY OBTAINED

PERSONS UNKNOWN WHO HAVE ACCESSED, COPIED, PHOTOGRAPHED, SCANNED OR OTHERWISE OBTAINED DOCUMENTS FROM GREENWICH HOUSE WITHOUT THE CONSENT OF THE CLAIMANT

THE CLAIMANT HAS TODAY FILED ITS PARTICULARS OF CLAIM WITH THE COURT IN RELATION TO THE ABOVE PROCEEDINGS

A COPY THE CLAIM FORM AND PARTICULARS OF CLAIM ARE AVAILABLE AT THE FOLLOWING WEBSITE: WWW.CAM.AC.UK/NOTICES

**IMPORTANT NOTICE
HIGH COURT OF JUSTICE
CLAIM NO - KB-2024-001755**

FROM: THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE (THE "CLAIMANT")

TO: PERSONS UNKNOWN WHO ARE OCCUPYING GREENWICH HOUSE AND HAVE ACCESSED AREAS WITHIN GREENWICH HOUSE WHERE CONFIDENTIAL INFORMATION IS HELD AND THREATENING OR INTENDING TO RELEASE THE INFORMATION THEREBY OBTAINED

PERSONS UNKNOWN WHO HAVE ACCESSED, COPIED, PHOTOGRAPHED, SCANNED OR OTHERWISE OBTAINED DOCUMENTS FROM GREENWICH HOUSE WITHOUT THE CONSENT OF THE CLAIMANT

ON 14 FEBRUARY 2025, THE CLAIMANT FILED AN APPLICATION DATED 14 FEBRUARY 2025 FOR A REVIEW HEARING OF THE INTERIM NON-DISCLOSURE ORDER

A COPY THE APPLICATION DATED 14 FEBRUARY 2025 IS AVAILABLE AT THE FOLLOWING WEBSITE: WWW.CAM.AC.UK/NOTICES

IMPORTANT NOTICE
 HIGH COURT OF JUSTICE
 CLAIM NO - KB-2024-001755
 14 FEBRUARY 2025

FROM THE UNIVERSITY, RESPONDENT, AND STUDENTS OF THE UNIVERSITY OF CAMBRIDGE (THE "UNIVERSITY")
 TO THE PUBLIC (INCLUDING THE CLAIMANT)
 THE UNIVERSITY AND STUDENTS HAVE BEEN ADVISED THAT THE CLAIMANT HAS FILED A CLAIM FOR DAMAGES AGAINST THE UNIVERSITY AND STUDENTS IN CONNECTION WITH THE UNIVERSITY'S POLICY ON SEXUAL HARASSMENT AND SEXUAL MISCONDUCT. THE UNIVERSITY AND STUDENTS ARE NOT AWARE OF ANY SUCH CLAIM AND DO NOT BELIEVE THAT ANY SUCH CLAIM IS VALID OR THAT THE CLAIMANT IS ENTITLED TO ANY DAMAGES.

THE UNIVERSITY AND STUDENTS HAVE BEEN ADVISED THAT THE CLAIMANT HAS FILED A CLAIM FOR DAMAGES AGAINST THE UNIVERSITY AND STUDENTS IN CONNECTION WITH THE UNIVERSITY'S POLICY ON SEXUAL HARASSMENT AND SEXUAL MISCONDUCT. THE UNIVERSITY AND STUDENTS ARE NOT AWARE OF ANY SUCH CLAIM AND DO NOT BELIEVE THAT ANY SUCH CLAIM IS VALID OR THAT THE CLAIMANT IS ENTITLED TO ANY DAMAGES.

A COPY OF THE CLAIM FORM AND PARTICULARS OF CLAIM ARE AVAILABLE AT THE FOLLOWING WEBSITE: <https://www.courts.gov.uk/>

IMPORTANT NOTICE
 HIGH COURT OF JUSTICE
 CLAIM NO - KB-2024-001755

FROM THE UNIVERSITY, RESPONDENT, AND STUDENTS OF THE UNIVERSITY OF CAMBRIDGE (THE "UNIVERSITY")
 TO THE PUBLIC (INCLUDING THE CLAIMANT)
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A COPY OF THE APPLICATION DATED 14 FEBRUARY 2025 IS AVAILABLE AT THE FOLLOWING WEBSITE: <https://www.courts.gov.uk/>

IMPORTANT NOTICE – HEARING ON 27 FEBRUARY 2025

HIGH COURT OF JUSTICE CLAIM NO - KB-2025-000487

FROM THE UNIVERSITY, RESPONDENT, AND STUDENTS OF THE UNIVERSITY OF CAMBRIDGE (THE "UNIVERSITY")
 TO THE PUBLIC (INCLUDING THE CLAIMANT)
 THE UNIVERSITY AND STUDENTS HAVE BEEN ADVISED THAT THE CLAIMANT HAS FILED A CLAIM FOR DAMAGES AGAINST THE UNIVERSITY AND STUDENTS IN CONNECTION WITH THE UNIVERSITY'S POLICY ON SEXUAL HARASSMENT AND SEXUAL MISCONDUCT. THE UNIVERSITY AND STUDENTS ARE NOT AWARE OF ANY SUCH CLAIM AND DO NOT BELIEVE THAT ANY SUCH CLAIM IS VALID OR THAT THE CLAIMANT IS ENTITLED TO ANY DAMAGES.

THE UNIVERSITY AND STUDENTS HAVE BEEN ADVISED THAT THE CLAIMANT HAS FILED A CLAIM FOR DAMAGES AGAINST THE UNIVERSITY AND STUDENTS IN CONNECTION WITH THE UNIVERSITY'S POLICY ON SEXUAL HARASSMENT AND SEXUAL MISCONDUCT. THE UNIVERSITY AND STUDENTS ARE NOT AWARE OF ANY SUCH CLAIM AND DO NOT BELIEVE THAT ANY SUCH CLAIM IS VALID OR THAT THE CLAIMANT IS ENTITLED TO ANY DAMAGES.

A HEARING AND OPEN JUSTICE DAY WILL BE HELD ON 27 FEBRUARY 2025 AT THE HIGH COURT OF JUSTICE, QUEEN'S BENCH, 11 MAULMEY STREET, LONDON, WC2A 2LL. THE HEARING WILL BE HELD IN OPEN COURT AND WILL BE TRANSMITTED LIVE ON THE COURT'S WEBSITE: <https://www.courts.gov.uk/>

A COPY OF THE CLAIM FORM AND PARTICULARS OF CLAIM ARE AVAILABLE AT THE FOLLOWING WEBSITE: <https://www.courts.gov.uk/>



Automatic door



HIGH COURT OF JUSTICE CLAIM NO - KB-2025-000

IMPORTANT NOTICE HEARING ON 27 FEBRUARY 2025

FROM: THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE ("THE UNIVERSITY")

TO: PERSONS UNKNOWN WHO, IN CONNECTION WITH CAMBRIDGE FOR PALESTINE, 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 OR PLACE ANY STRUCTURE (INCLUDING TENTS) ("PERSONS UNKNOWN") ON, THE FOLLOWING SITES:

- (A) GREENWICH HOUSE, MADINGLEY RISE, CAMBRIDGE, CB3 0TX
- (B) SENATE HOUSE AND SENATE HOUSE YARD, TRINITY STREET, CAMBRIDGE, CB2 3RQ
- (C) THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN, (TOGETHER "THE OLD SCHOOLS")

ON 12 FEBRUARY 2025, A CLAIM WAS ISSUED BY THE UNIVERSITY IN THE HIGH COURT OF JUSTICE SEEKING AN ORDER PROHIBITING PERSONS UNKNOWN FROM ENTERING, OCCUPYING OR REMAINING UPON THE LAND, AND/OR BLOCKING, PREVENTING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH ACCESS TO ANY PART OF THE LAND AND/OR (III) ERECTING OR PLACING ANY STRUCTURE (INCLUDING TENTS) ON THE LAND.

A HEARING HAS BEEN LISTED FOR 3 HOURS ON 27 FEBRUARY 2025 AT THE ROYAL COURTS OF JUSTICE, STRAND, LONDON, WC2A 2PL, WHICH THE UNIVERSITY'S CLAIM WILL BE HEARD ON AN INTERIM BASIS.

A COPY OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION, INCLUDING PLANS OF THE LAND, CAN BE OBTAINED FROM THE FOLLOWING WEBSITE: WWW.CAM.AC.UK/NOTICES

HARD COPIES OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION CAN BE OBTAINED FROM THE RECEPTION OF THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE CB2 1TN, WITHIN NORMAL WORKING HOURS. TO ARRANGE FOR COLLECTION, PLEASE CONTACT: CLAIMDOCUMENTSREQUEST@ADMIN.CAM.AC.UK

DOCUMENTS ENCLOSED







HIGH COURT OF JUSTICE (CLAIM NO. 18 2023 00042)
**IMPORTANT NOTICE –
HEARING ON 27
FEBRUARY 2025**
UNIVERSITY OF CAMBRIDGE

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CAMBRIDGE
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HIGH COURT OF JUSTICE CLAIM NO - KB-2025-000497

**IMPORTANT NOTICE -
HEARING ON 27
FEBRUARY 2025**

DOCUMENTS ENCLOSED

CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE
(“UNIVERSITY”)

PERSONS UNKNOWN WHO, IN CONNECTION WITH CAMBRIDGE FOR PALESTINE OR
FOR A PURPOSE CONNECTED WITH THE PALESTINE-ISRAEL CONFLICT, WITHOUT
THE UNIVERSITY'S CONSENT (I) ENTER OCCUPY OR REMAIN UPON (II) BLOCK, PREVENT,
SLOWLY OR OTHERWISE INTERFERE WITH ACCESS TO (III) ERECT ANY
STRUCTURE (INCLUDING TENTS) (“PERSONS UNKNOWN”) ON, THE FOLLOWING SITES:

GREENWICH HOUSE, MADINGLEY RISE, CAMBRIDGE, CB3 0TX

SENATE HOUSE AND SENATE HOUSE YARD, TRINITY STREET, CAMBRIDGE, CB2 1TA

THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN, (TOGETHER “THE LAND”)

ON 27 FEBRUARY 2025, A CLAIM WAS ISSUED BY THE UNIVERSITY IN THE HIGH COURT OF
JUSTICE ASKING AN ORDER PROHIBITING PERSONS UNKNOWN FROM ENTERING,
OCCUPYING OR REMAINING UPON THE LAND, AND/OR BLOCKING, PREVENTING, SLOWING
DOWN OR OTHERWISE INTERFERING WITH ACCESS TO ANY OTHER
STRUCTURE OR OTHERWISE INTERFERING WITH ACCESS TO ANY OTHER
STRUCTURE ON THE LAND AND/OR (III) ERECTING OR PLACING ANY STRUCTURE (INCLUDING
TENTS) ON THE LAND.

A HEARING HAS BEEN LISTED FOR 3 HOURS ON 27 FEBRUARY 2025

AT THE ROYAL COURTS OF JUSTICE, STRAND, LONDON, WC2A 2LL, AT

10.30 AM. THE UNIVERSITY'S CLAIM WILL BE HEARD ON AN INTERIM

HEARING.

COPIES OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION, INCLUDING

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IMPORTANT NOTICE
HEARING ON 27
FEBRUARY 2025



HIGH COURT OF JUSTICE CLAIM NO - KB-2025-000497

IMPORTANT NOTICE HEARING ON 27 FEBRUARY 2025

FROM: THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE ("THE UNIVERSITY")

TO: PERSONS UNKNOWN WHO, IN CONNECTION WITH CAMBRIDGE FOR PALESTINE OTHERWISE FOR A PURPOSE CONNECTED WITH THE PALESTINE-ISRAEL CONFLICT, WITHOUT THE CLAIMANT'S CONSENT (I) ENTER OCCUPY OR REMAIN UPON (II) BLOCK, SLOW DOWN, OBSTRUCT OR OTHERWISE INTERFERE WITH ACCESS TO ANY BUILDING OR STRUCTURE (INCLUDING TENTS) ("PERSONS UNKNOWN") ON, THE FOLLOWING:

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

ON 12 FEBRUARY 2025, A CLAIM WAS ISSUED BY THE UNIVERSITY IN THE HIGH COURT OF JUSTICE SEEKING AN ORDER PROHIBITING PERSONS UNKNOWN FROM OCCUPYING OR REMAINING UPON THE LAND, AND/OR BLOCKING, PREVENTING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH ACCESS TO ANY BUILDING INDIVIDUAL TO THE LAND AND/OR (III) ERECTING OR PLACING ANY STRUCTURE (INCLUDING TENTS) ON THE LAND.

A HEARING HAS BEEN LISTED FOR 3 HOURS ON 27 FEBRUARY 2025 AT THE ROYAL COURTS OF JUSTICE, STRAND, LONDON, WC2R 2BZ, WHICH THE UNIVERSITY'S CLAIM WILL BE HEARD ON AN AMICUS CURIAE BASIS.

A COPY OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION AND PLANS OF THE LAND, CAN BE OBTAINED FROM THE FOLLOWING WEBSITE: WWW.CAM.AC.UK/NOTICES

HARD COPIES OF THE CLAIM DOCUMENTS AND ASSOCIATED APPLICATION CAN BE OBTAINED FROM THE RECEPTION OF THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN, WITHIN NORMAL WORKING HOURS. TO ARRANGE FOR COLLECTION, PLEASE EMAIL: DOCUMENTSREQUEST@ADMIN.CAM.AC.UK.

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IMPORTANT NOTICE
HEARING ON 27
FEBRUARY 2025
DOCUMENTS ENCLOSED

Uni requests encampment ban

The University obtained non-disclosure orders against Greenwich House protesters

by Hugh Jones

Friday February 21 2025, 12:00am



The University has consistently rejected suggestions that their response to the protests infringes on the activists' freedom of protest. TAMANI ONO FOR VARSITY

The University of Cambridge has applied for a High Court injunction prohibiting pro-Palestine protesters from entering, occupying, or interfering with access to University head offices.

If the University is successful, protesters will no longer be able to enter, occupy, or interfere with access to Senate House and its lawn, the Old Schools, and Greenwich House "for a purpose connected with the Palestine-Israel conflict." A hearing has been scheduled for next Thursday (27/2).

Protesters "may be held to be in contempt of court and may be imprisoned or fined or have [their] assets seized" if they breach the injunction, according to court documents. But, internal University discussions noted that the order does not "criminalise" further protests.

According to the minutes of a meeting of senior University officials earlier this month, if the order is breached "it will then be a matter for the University to consider whether to institute proceedings for contempt of court against".

The University has consistently rejected suggestions that their response to the protests infringes on the activists' freedom of protest.

A spokesperson for the University previously told *Varsity*: "Any claim that the University is trying to restrict protest is ridiculous. There are many ways protests can take place and voices can be heard, but the actions we are taking will protect the right of other members of our community to graduate and for staff to carry out their work."

The University told the court that if occupations continued, the "irreparable harm" done to Cambridge and its stakeholders "cannot be adequately compensated in money". According to a sworn statement by Emma Rampton, the University's registrar, the occupations of Greenwich House and Senate House lawn last year cost the University "at least £250 000".

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This went towards additional security and the cleaning of Greenwich House after the occupation ended, including an electronic security sweep. It also included “substantial” legal costs related to the University’s application for an interim non-disclosure order against protesters who accessed confidential documents.



The University also cited disruption to graduations caused by the Senate House occupation as justification for the order. In May 2024, the graduations of over 1,000 graduands, with over 2,700 guests, were disrupted when C4P occupied Senate House Yard, with ceremonies being moved into colleges.

Last November, more than 500 graduands also had their degree ceremonies disrupted when the occupation restarted, forcing ceremonies into Great St Mary’s church.

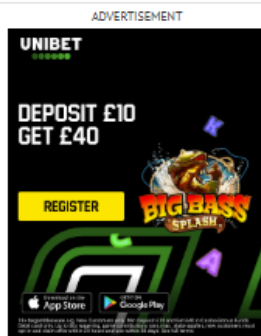
The University said that this disruption caused “significant stress” for University and college staff, and had a “significant adverse impact” on graduands and their guests. It warned that in the future it might not be able to source alternative buildings at short notice.

Rampton also outlined the broader harm caused by last term’s occupation of Greenwich House. In particular, Rampton identified concerns about activists accessing confidential or commercially sensitive information while occupying the buildings, after activists were observed accessing restricted areas of Greenwich House, and opening and searching through locked cabinets.

She noted that Cambridge generates a turnover of over £500 million each year from research grants, which could be jeopardised if the University cannot maintain its obligations to safeguard confidential information.

These concerns led the University to seek and obtain High Court orders prohibiting protesters from sharing information they obtained while occupying Greenwich House last year.


On 6 December, the day the Greenwich House occupation ended, Mr Justice Trower ordered protesters to hand documents which they took during the occupation over to the University’s solicitors, and to destroy any copies they made.



The judge also ordered the activists to confirm to the University that they had handed over all information in their possession, and destroyed all copies. The protesters were also ordered to identify anyone with whom they had shared the information.



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In a subsequent hearing, also at the High Court, held on 13 December last year, Mr Justice Mann reiterated that: “The Defendants must not use, publish or communicate or disclose to any other person” any information “accessed or obtained during the course of the occupation of Greenwich House”.

If the defendants breach the order, they “may be held to be in contempt of court and may be imprisoned or fined or have [their] assets seized,” according to court documents.

It is not known whether the protesters complied with the orders. Last Friday (14/2), the University applied for a further hearing to take place in April. It also asked for permission to make a witness statement explaining the findings of an ongoing audit assessing which documents in Greenwich House were accessed by the activists.

In addition to this, the University authorities have been trying to ascertain the identities of those who occupied Greenwich House and Senate House lawn last year.

According to Rampton’s witness statement, Cambridge has been processing CCTV footage, C4P’s Instagram posts, and photographs taken by University staff and security to try to identify students. This process has included passing images to Senior Tutors and Head Porters who were willing to assist with this process.


The University also considered identifying protesters occupying the building using WiFi access data from Greenwich House, but decided against it, as passersby could be unwittingly captured on those logs.

Rampton added that the University was concerned that sharing images of occupiers more widely, such as via a website, carried “a high risk of misidentification and possibly victimisation”.

She also said that the University had only identified one protester so far, who they are not naming because “it would be unfair to single him out and to subject him to the media attention that he might get”. It is not known if this individual is subject to other disciplinary proceedings.

Greenwich House contains several of the University’s main administrative departments. The pro-Palestine activists occupied the site last term to protest Cambridge’s response to the conflict in Israel and Gaza. They called on Cambridge to condemn “genocide” in Palestine, and to divest its holdings in companies which support the Israeli war effort.

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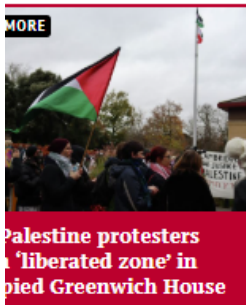
Specifically, the occupation came in response to C4P's belief that the University was renegeing on an agreement made with the group, in which C4P dismantled its encampment on King's Parade in exchange for the University agreeing to review its investments in arms companies.

That review is ongoing, but on 14 November last year, the University **published** a statement on the status of the working group, which acknowledged a delay to the group's work, claiming that its initial "timescales" for reviewing its weapons ties were "optimistic".

This statement was criticised by students and academics, who accused the University of "back-peddalling" and "watering down" its commitments.

In response to the subsequent occupation of Greenwich House, and the renewed occupation of the Senate House Yard on 27 November, the University removed two C4P representatives from the working group conducting the review into arms investments. They were reinstated following the end of the occupation.

At the time, Emma Rampton said: "Dialogue cannot proceed while significant parts of the University are subjected to disruption and occupation."



Tensions rose further when C4P claimed that on 2 December students occupying the building had been **threatened** with "permanent or temporary exclusion from the University". It is not known whether such action was taken. The occupation ended shortly afterwards, on 6 December.

This was not the first time that Greenwich House has been occupied by activists. In 2018, Cambridge's Zero Carbon Society occupied the building in order to push the University to commit to divesting from fossil fuels by 2022.

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After seven days, the University obtained a court order enabling them to evict the occupiers, who were then physically removed from the building by bailiffs.

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Varsity is the independent newspaper for the University of Cambridge, established in its current form in 1947. In order to maintain our editorial independence, our print newspaper and news website receives no funding from the University of Cambridge or its constituent Colleges.

We are therefore almost entirely reliant on advertising for funding and we expect to have a tough few months and years ahead.

In spite of this situation, we are going to look at inventive ways to look at serving our readership with digital content and of course in print too!

Therefore we are asking our readers, if they wish, to make a donation from as little as £1, to help with our running costs. Many thanks, we hope you can help!

Donate



Cambridge seeks block on activists

The Times (London)

February 21, 2025 Friday

Edition 1, Ireland

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THE TIMES

Section: NEWS; Pg. 16

Length: 199 words

Byline: Georgia Lambert; Hugh Jones

Body

Cambridge University is seeking a High Court **injunction** to prevent pro-Palestine activists from occupying key sites on campus after months of disruption.

Legal documents show the university applied for an order barring protesters from entering, occupying or interfering with access to three locations "for a purpose connected with the Palestine- Israel conflict". A hearing is scheduled for next Thursday.

If granted, the order would mean those who breach it could be jailed, fined or have assets seized. Varsity, the student newspaper, reported that internal discussions confirmed the order did not "criminalise" future protests.

The university has cited disruption and financial losses to justify the action.

The graduations of more than 1,000 students, attended by at least 2,700 guests in May last year, were thrown into disarray when **Cambridge** 4 Palestine, the student activist group, occupied a lawn. Emma Rampton, the university's registrar, said in a sworn witness statement that the occupations cost **Cambridge** "at least £230,000".

A university official said: "We are seeking this **injunction** to protect the right of students to graduate. It does not restrict the important right to protest."

Load-Date: February 21, 2025

End of Document

See all News

Pro-Palestine activists accused of stealing sensitive documents from Cambridge

Members of protest group raided locked filing cabinets during 15-day occupation of main administrative building late last year

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Pro-Palestinian protesters erected an encampment outside King’s College in Cambridge in May last year Credit: Leon Neal/Getty Images

Poppy Wood Education Editor. Felix Armstrong
20 February 2025 7:19pm GMT

Pro-Palestine protesters are thought to have stolen commercial secrets from the University of Cambridge when they stormed a building during demonstrations last year, The Telegraph has learnt.

Members of the Cambridge for Palestine protest group raided locked filing cabinets holding highly confidential documents belonging to the university **700**

during their 15-day occupation of Greenwich House from Nov 22 to Dec 6 last year.

The property is one of Cambridge University's main administrative buildings and houses commercially sensitive and personal information relating to the institution.

In court documents seen by The Telegraph, Cambridge accused protesters of launching an “apparently intentional search for documents”, which it warned “posed a significant threat to the safeguarding of the confidential, commercially sensitive and/or personal information stored at Greenwich House”.

The university claimed this entailed “deliberate breaches” of security, including pro-Gaza activists “gaining access to restricted areas of the building, opening locked cabinets and searching through cabinets”.

It said this came after protesters activated the fire alarm of the building on Madingley Rise, prompting staff to evacuate those inside.

Members of the activist group then covered the windows and blockaded the entrances and exits to prevent staff from re-entering the building.



Protests took place across Cambridge following the outbreak of the Israel-Hamas conflict calling for the university to cut its alleged financial ties to Israel Credit: Julian Simmonds for The Telegraph

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Cambridge has now obtained a legal injunction against anybody sharing information obtained through the ransack, although there are fears that such rulings always risk being broken.

The Telegraph understands that no sensitive information has been disseminated to date.

Pro-Palestine activists are understood to have been searching for contracts and other confidential documents linking the university to Israeli arms companies.

It follows a string of protests across Cambridge following the outbreak of the Israel-Hamas conflict calling for the university to cut its alleged financial ties to Israel.

The Cambridge for Palestine protest group claims to be a student-led coalition “standing against Cambridge University’s complicity in apartheid and genocide”, but there are concerns it may have been infiltrated by outside activists.

Cambridge said in legal documents that the group had previously shown a “clear and stated interest... in the university’s relationship with companies connected with the defence industry, such as Rolls-Royce and BAE Systems, in relation to which confidential documents were stored in Greenwich House”.

University staff have since carried out an audit of documents held at Greenwich House “to try and establish whether they had been inspected or interfered with during the occupation”, but the nature and extent of possible intrusion has not been made public.



Cambridge has now applied to the High Court for a second injunction to prevent further pro-Gaza demonstrations taking place on campus, The Telegraph can reveal.

The legal claim hopes to halt future disruption by Cambridge for Palestine, plus people “who purport to be students of the university, protesting in relation to the Israel-Palestine conflict and the university’s alleged complicity in the actions of the Israeli Defence Force”.

In a witness statement submitted to the court on Feb 14, Emma Rampton, Cambridge’s principal administration officer, said an urgent injunction was necessary to protect the university from the risk of “irreparable harm” that could be caused by future encampments.

The university warned there was a “real and imminent risk” that pro-Palestine protesters were planning to launch a further wave of demonstrations in the coming weeks that could disrupt graduation ceremonies for a second year running.

More than 1,600 students had their graduation events disrupted by pro-Gaza protests across the university last year, Cambridge said.

This included around 1,160 students whose ceremonies were disturbed by a pro-Palestine occupation on the lawn outside Cambridge’s Senate House building in May. A further 500 students had their graduations impacted by fresh encampment on the Senate House lawn last November.

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Ms Rampton said the occupations “affected not only the graduands involved but also their guests... many of whom had travelled long distances to celebrate the special day”.

She told the High Court that Cambridge feared pro-Palestine protesters planned to target future events, including a graduation ceremony for more than 500 students set to take place on March 1.



Palestinian flags and the words 'From the River' are adorned on the Senate House next to King's College chapel in May
Credit: MartinPope/Getty Images

The top university estimates the demonstrations have cost it £230,000 so far in cleaning, security and legal fees.

Court documents also reveal the university continues to have concerns over the possible “unlawful dissemination” of highly confidential material thought to have been accessed in the Greenwich House demonstration last November.

It comes despite Cambridge being granted a non-disclosure order in December preventing anyone from sharing the documents. The injunction applies to “persons unknown” since the university has only identified one individual involved in the protests so far.

Ms Rampton warned in legal documents that a potential breach of the court order “could have serious consequences for the university”, including breach

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of contract claims against Cambridge, the withdrawal of grant funding or termination of contracts.

She said any infringement also risked compromising “the commercial interests of its partners”, plus potential reputational damage for Cambridge.

“The university has an annual turnover from research grants in excess of £500 million... The publication or misuse of documents and information stored at Greenwich House and the Old Schools could have serious consequences for the university,” Cambridge’s principal administration officer said.

Legal documents show the university also referred itself to the Information Commissioner’s Office (ICO) in December over “potential personal data breaches that may have occurred” following the two-week lock-in at Greenwich House.

The ICO is understood to have closed the case without identifying any personal data breaches.

Cambridge has been the subject of frequent protests and occupations targeting the university’s alleged investments in Israel since the October 7 attacks more than two years ago.

Protesters agreed to disband their encampments last summer but launched fresh occupations in November after accusing the university of “breaking” its agreements over ongoing arms investments.

It is not known how much of Cambridge’s £4 billion endowment fund is invested in Israeli firms, though individual colleges have already pledged to divest from military companies.

Trinity College was issued a legal notice by a UK-based human rights group last March following allegations it holds almost £62,000 in Elbit Systems, Israel’s largest arms manufacturer.

A spokesman for Cambridge University said: “Last year, the graduation of more than 1,600 students was disrupted by a small group who occupied parts of the university.

“Like other universities, we also recently had an occupation of one of our university buildings, in which occupiers gained access to confidential material about research and staff. We have acted to protect that information.

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“We are also seeking a second injunction that will protect the right of our students to graduate and for staff to carry out their work. It does not restrict the important right to legal protest. There are many ways protests can take place and voices can be heard.”

A Cambridge for Palestine spokesperson said: “As students, faculty, and community members at Cambridge, our coalition is concerned by the implications of the university’s pursuit of an injunction to curb protest related to Palestine.

“Not only is this an attempt to distract from the university’s long-standing complicity in the genocide of Palestinians, it is also a broader affront to the right to protest and principles of academic freedom that the university claims to stand on.

“The university’s embrace of repression tactics will not deter the struggle for divestment.”

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

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

**SECOND 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**". This witness statement is my second in these proceedings.
- 2 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.

- 3 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, which have then been verified by me.
- 4 There is now produced and shown to me a bundle of documents marked “ER2” to which I refer to in this witness statement. References to page numbers are to pages of “ER2”. The exhibit ER2 contains the following documents:

Document description	Date	Page number(s) of ER2
Varsity article, “Students and staff launch campaign against proposed encampment bans”	24 February 2025	1-4
Open letter	Undated	5-9
Cambridgeunistaff4palestine webpage	23 February 2025	10-13
University College Union publication, “Cambridge condemned by UCU and leading campaigners for attack on peaceful protest”	26 February 2025	14-15
Redacted copy of the email to Professor Bhaskar Vira	21 February 2025	16-17
Cambridge for Palestine x.com publications	25 February 2025	18-22

terms of admission for undergraduates (entry October 2024)		23-33
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Press response to notice of the application

- 5 The University took various steps on 19 February 2025 to draw attention to its application for the injunction order that is the subject of these proceedings (“**the Application**”). The steps that the University undertook are described in the statement of Samuel Maw dated 24 February 2025, a solicitor acting for the University.
- 6 Several press outlets have contacted the University for comment and published articles in response to the University’s publication of the Application documents.

(i) Telegraph article

- 7 On 20 February 2025, The Telegraph published on its website an article titled, “Pro-Palestine activists accused of stealing sensitive documents from Cambridge”, a copy of which is reproduced at pages 23-29 of Exhibit SM1 that accompanies Samuel Maw’s witness statement dated 24 February 2025. The focus of this article is the occupation of Greenwich House that occurred between 22 November 2024 and 6 December 2024, which precipitated the University’s application for a non-disclosure order to prevent the use, publication or communication of confidential information that may have been accessed or obtained from within the building during the course of the occupation. The circumstances of this occupation and the University’s application for a non-disclosure order are described in my first witness statement dated 14 February 2025 at paragraphs 53-59.
- 8 The Telegraph article uses some language that has not at any time been used by the University’s leadership team, neither during the course of the Greenwich House occupation, the proceedings for a non-disclosure order, or these proceedings. The University has not “accused activists of stealing sensitive documents”, nor has it suggested that pro-Palestine protestors have “stolen commercial secrets” from the University.

9 Also, the Telegraph article refers to the Application and quotes parts of my first witness statement dated 14 February 2025. The article purports to quote a spokesperson for Cambridge for Palestine, who is reported to have made the following comment in response to the Application:

“The university’s embrace of repression tactics will not deter the struggle for divestment.”

(ii) Times bulletin

10 On 21 February 2025, the Times published an article titled, “Cambridge seeks block on activists”, a copy of which is reproduced at page 22 of Exhibit SM1.

(iii) Varsity first article

11 On 21 February 2025, Varsity, an independent newspaper for the University student community, published an article titled, “Uni requests encampment ban”, a copy of which is reproduced at pages 18-21 of Exhibit SM1.

(iv) Varsity second article

12 On 24 February 2025, Varsity published an article titled, “Students and staff launch campaign against proposed encampment bans”, a copy of which is reproduced at pages 1-3.

13 The article refers to an open letter addressed to the University’s Vice Chancellor, Professor Deborah Prentice, that is reported to have been drafted by members of Regent House and students, a copy of which is reproduced at 5-9. The open letter refers to the signatories’ concerns in relation to the Application. The letter condemns the University’s decision to make the Application. I am aware that the open letter has been circulated by a group named, “Cambridgeunistaff4palestine”, as shown in the webpage reproduced at pages 10-13.

14 I understand that as of 5pm Monday 24 February, the webpage displaying the open letter records that nearly 900 people have signed the letter, including 171 current members of staff within the University, 402 current students and 200 alumni. I cannot readily verify these numbers nor the identities of those who are said to have signed the letter.

(v) The University and College Union press release

- 15 On 26 February 2025, the University and College Union (UCU), a trade union and professional association for academics and other education staff, released a press statement, a copy of which is reproduced at pages 14-15. The press release is titled, "Cambridge condemned by UCU and leading campaigners for attack on peaceful protest".

Student Union and Palestinian Solidarity Society response to notice of the application

- 16 In addition to the open letter to which I refer above, on 21 February 2025, Professor Bhaskar Vira, Pro-Vice Chancellor for Education, received a request from representatives for the Student Union and the Palestinian Solidarity Society to meet for the purpose of raising their concerns with regards to the Application. A redacted copy of the email is at page 15-17.
- 17 On 25 February 2025, Professor Bhaskar Vira met with those representatives, who I do not name in this statement, because I do not know whether they are willing to be named in evidence in the course of these proceedings. I understand that, during this meeting, the representatives expressed sentiments the same as those or similar to those reflected in the open letter to which I refer above. The representatives said that the University should consider other means of engagement with the relevant student groups, including further dialogue with them, and that it ought to postpone the Application, otherwise there would be the risk of what they called, "an accelerated response".
- 18 Professor Bhaskar Vira's role during the encampment at Senate House Yard in May 2024 and afterwards, in particular, in connection with the University's dialogue with Cambridge for Palestine and the University's establishment of the working group to review its approach to investments in, and research funded by, the defence industry, are matters that are described in my first witness statement dated 14 February 2025 at paragraphs 84-92.

Cambridge for Palestine's response to notice of the application

- 19 The group, Cambridge for Palestine, has responded to the Application on its social media profiles, copies of which are reproduced at pages 18-22. The relevant social media publications, in response to the Application, include the following statements:

“In a claim dated 12 February, Cambridge University filed for a 5-year injunction to criminalise protests for Palestine on or around Senate House, Old Schools, and Greenwich House, threatening its own students with imprisonment and fines for protesting genocide.

Defining the “Defendants” as anyone protesting “in relation to the Israel-Palestine conflict and the University’s alleged complicity in the actions of the Israeli Defence Force,” Cambridge seeks to single out and criminalise anyone protesting for Palestine, continuing its pattern of racist targeting.

By the terms of its claim, something as simple as a graduating student waving a Palestinian flag outside of their Senate House ceremony could constitute “obstruction”.”

- 20 Cambridge for Palestine has organised a rally to take place outside Great St Mary’s Church, Cambridge at 11am on Saturday 1 March 2025, the day on which a graduation Congregation is scheduled to take place at Senate House. The rally appears to have been organised in response to the Application. The Church is situated in front of and only approximately short distance from the entrance to Senate House Yard.

The involvement of police and the allegation of criminalising activities

- 21 The response from Cambridge for Palestine, and of some of those quoted in the UCU article that I refer to above, suggest that the University has, by the Application, sought to criminalise peaceful protest. This is a mischaracterisation.
- 22 First, these statements misinterpret the effect of the order that has been sought by the University: my understanding is that the injunction order will be civil, and the breach of it will be a civil, not criminal, matter. If the injunction order is granted, and a person breaches the terms of the injunction, I am advised that it will be a matter for the University to consider the nature of the breach and to decide whether to bring an application for committal for contempt of court against an individual. The University has in no way sought to prejudge the making of such an application for committal.
- 23 Second, these statements do not reflect either the University’s approach to student-led protests or the nature of the acts of protests that have, regrettably, precipitated the Application. I wish to respond to this allegation by briefly explaining the University’s

approach to student-led occupations and its reluctance to date to involve the police or criminal law enforcement in response to such occupations. I further explain what contact the University has had with the police in connection with the recent encampments and the occupation that I refer to in my first witness statement.

(i) General approach

- 24 The University has historically had an approach whereby, in appropriate circumstances, it will not, for a short period, take enforcement measures against a student-led or staff occupation of its land or buildings, in respect of which the occupying group has not sought or been given the University's permission. If a group's activities are of a particularly serious nature, or if they do not leave when the University requests that they do so, generally, the University applies to court for a possession order. Historically, the University has given notice to occupants requiring that they vacate the property within one or two days of the occupation having begun.
- 25 The University has not generally asked the police to intervene in these matters. This is because the University supports the rights of its students and staff to freedom of speech within the law, and it does not wish to put its students and staff, who may consider that they are engaging in a lawful protest or that their actions are otherwise justified, under the stress of and subject to criminal law enforcement in circumstances where the University can reasonably manage the occupation. Nor has the University utilised its rights as a landowner to remove the occupiers itself without following a court process.
- 26 It is principally a matter for the University's security team to contact the police and ask for assistance if the actions of occupiers are criminal (such as breaking and entering or damaging property, or if there is violence). Otherwise, the University endeavours to rely on civil remedies.
- 27 The University considers on a case-by-case basis whether disciplinary action should be taken against individuals in connection with student-led or staff occupations, and rarely does it do so. Separately, Colleges of the University may instigate their own disciplinary processes if they consider it appropriate.

28 This approach is demonstrated in the previous occupations that are referred to in my first witness statement. In respect of the May 2018 occupation of Greenwich House by a group, “Cambridge Zero Carbon Society”, that is referred to in my first statement at paragraph 120, the occupation started on 18 May 2018 and the University applied to the county court for a possession order on 23 May 2018. In respect of the March 2020 occupation of the Old Schools by the groups, “Cambridge Defend Education” and “the Cambridge Marxist Society” that is referred to in my first statement at paragraph 121, the occupation started on 3 March 2018 and the University applied to the county court for a possession order on 11 March 2020. In neither case did the University contact the police on 999 and ask the police to intervene.

(ii) Senate House Yard encampments

29 The University has not had, at least, not in recent history, encampments at Senate House Yard or encampments that have been convened with the deliberate purpose of disrupting graduation Congregations, such as the two encampments that were convened in, respectively, May 2024 and November 2024 by or in association with the group, Cambridge for Palestine. I describe these events in my first witness statement at paragraphs 37-52 and 74-83.

30 Notwithstanding that, in respect of both of these encampments, the University did not contact the police on 999 and ask that they intervene. Nor did the University instigate civil possession proceedings. In respect of the first of the two encampments, I understand that the University’s security team liaised with the South Cambridge Area Commander and the City Centre Police Sergeant following concerns about similar protest events that had occurred at the University of Oxford. However, as I say, the police were not asked to intervene.

31 In respect of the second of the two encampments, on the morning of 27 November 2024, the University’s security team informed the police liaison team of the encampment, but they did not request that the police attend. On the day of the graduation Congregation, 30 November 2024, which was reorganised to take place at Great St Mary’s Church as a result of the encampment at Senate House Yard, the police at the request of the University sent one Police Community Support Officer to be positioned near the Church.

(iii) Greenwich House occupation

32 In respect of the occupation of Greenwich House by or in association with the group, Cambridge for Palestine between 22 November 2024 and 6 December 2024, which I refer to in my first witness statement at paragraphs 53-59 and 61-73, the University's security team reported the incident to the police on 22 November via a non-emergency police webchat. The University did not contact the police on 999 or request that the police intervene. Nor did the University instigate civil possession proceedings.

33 As I say in my first witness statement, the University applied to court for a non-disclosure order, but only after it discovered that the occupiers of Greenwich House had deliberately accessed restricted areas within the building and inspected the contents of locked cabinets. I do not wish to repeat what I have said already in my first witness statement; however, in so far as it is not clear in that statement, I make the point here that the actions of those who occupied Greenwich House in November / December 2024 were markedly different to those who have taken part in previous occupations of this building. Previously, participants of student-led occupations of this building have not purposely circumvented internal security measures to access restricted parts of the building or opened locked cabinets to inspect confidential documents, as those who participated in the most recent occupation.

(iv) The University's plan of action

34 In my view, the University and its leadership team have acted reasonably in relation to the previous two encampments at Senate House Yard and the occupation of Greenwich House.

35 This is despite (i) the significant disruption that these events caused to the University, its students and staff, (ii) the costs that the University incurred as a result and (iii) in connection with the Greenwich House occupation, the serious consequences of and risks posed to the University by the deliberate actions of those who under the pretence of protest gained unauthorised access to documents containing confidential information and personal data.

36 These were not peaceful acts of protest. In the case of Greenwich House, the occupiers refused entry to the University and its staff, including by affixing D-locks to the entrances and by interfering with the electronic card access system. In respect of the encampments at Senate House Yard, the occupiers excluded the University from using its own land, and

forced the University to make arrangements to conduct the Congregations at alternative premises.

37 The University does not intend to alter the approach it has historically taken in respect of student-led peaceful demonstrations. However, in the specific context of the three events that I have referred to and the threats made by Cambridge for Palestine to carry out acts that have at their aim the purpose of disrupting the University's lawful activities, the University has brought this Application. By doing so, the University hopes to rely on civil remedies rather than criminal law enforcement to prevent similar unlawful activities from occurring.

38 In connection with the forthcoming graduation Congregation on 1 March 2025, the University plans to hold the Congregation at Senate House, and it will endeavour to do so if protestors attempt to enter Senate House or the Yard, or to obstruct access to the Senate House or Yard.

39 If the University is obstructed or prevented from holding the Congregation at Senate House and Senate House Yard by a student-led group that are participating in protest, and those that are participating in the protest do not cooperate with the University's requests to enable the University to hold the Congregation at Senate House and Senate House Yard, the University will contact the police for assistance. If it is not possible for the University to hold the congregation at Senate House because of a significantly disruptive protest encampment or similar acts by disruption, the University will regrettably hold the congregation at alternative premises, or it will cancel the Congregation, and it will endeavour to communicate any alternative arrangements to graduands and guests in advance of the Congregation. There is expected to be 528 graduands and celebrants at the Congregation on Saturday 1 March, and 1303 guests, and so it will, again, be of considerable disruption and, potentially, cost to the University should it need to rely on alternative arrangements for the Congregation.

Other matters

40 In my first witness statement, at paragraph 98.2, I refer to the undergraduate terms of admission. In the exhibit bundle marked ER1, the terms of admission included at pages

133-145 are those relating to foundation year students. I exhibit with this statement at pages 23 to 33 the terms of admission for undergraduates (entry October 2024). Each of the terms of admission, whether they are foundation year, undergraduate or postgraduate, to adhere to the University's Rules of Behaviour and its statutes, ordinances and other regulations and policies generally.

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 by:
Emma Rampton
B3E91306D8004AF

Signed:

Name: EMMA MACHTELD CLARA RAMPTON

Dated:26 February 2025.....

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

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

EXHIBIT ER2

Students and staff launch campaign against proposed encampment bans

The open letter has dubbed the University's application for an injunction as an 'authoritarian reflex'

by Aneek Weerawardana

Monday February 24 2025, 8:12pm



99 shares



The Cambridge branch of the University and College Union (UCU) also passed a resolution condemning the use of Injunctions by the University. FARON SMITH FOR VARSITY

Students and members of staff across the University of Cambridge have signed an open letter to the vice-chancellor calling for the withdrawal of an application for an injunction which would prohibit pro-Palestine protesters from entering, occupying or interfering with access to key University sites.

If the application for the injunction is successful, protesters will be **forbidden** from entering or occupying Senate House and its lawn, the Old Schools, and Greenwich House "for a purpose connected with the Palestine-Israel conflict".

The letter addressed to Dr Deborah Prentice, the Vice-Chancellor of the University, has been drafted by current members of Regent House and students of the University.

The open letter expresses concerns over the University's application to the High Court for an injunction, dubbing the University's actions as "an assault on freedom of expression," and the "the creation of special repressive powers".

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The statement also claims that the application for an injunction “runs contrary to the collective rights and interests of the University community as a whole to debate, assemble and protest in order to hold those in authority to account”.



It goes on to accuse the University of being “inherently discriminatory and unfair,” adding that the injunction, if approved, would affect Palestinian and pro-Palestinian students and staff the most.

Dubbing the application for an injunction as an “authoritarian reflex,” the letter requested that it be withdrawn in order to “reaffirm the University’s commitment to protect the freedom of speech and assembly of its members”.

A spokesperson for the University previously told *Varsity*: “Any claim that the University is trying to restrict protest is ridiculous. There are many ways protests can take place and voices can be heard, but the actions we are taking will protect the right of other members of our community to graduate and for staff to carry out their work.”

The University told the High Court that if occupations were to continue, the “irreparable harm” done to Cambridge and its stakeholders “cannot be adequately compensated in money”. Last year’s occupations of Senate House lawn and Greenwich House cost Cambridge University “at least £250,000” according to a sworn statement by the University’s registry, Emma Rampton.



The Cambridge branch of the University and College Union (CUCU) also passed a resolution condemning the use of injunctions by the University. A motion – titled “Defend the right to protest” – was passed unanimously at a CUCU emergency general meeting earlier this month (11/2).



In a notice posted on the UCU website last week (19/2), the branch said that the use of injunctions by Universities to restrict protests and occupations is “a serious threat to freedom of assembly and expression,” adding that “disruptive protest plays a critical role in advancing and protecting democratic rights”.

The notice also stated that the branch is currently working on a campaign to corroborate with students and other campus unions to go against the University’s “attempts to suppress protest rights”.

As of 9pm yesterday (23/2), the open letter has been signed by 110 current members of staff, 315 students, and 92 alumni, with the initial set of signatures due to be sent to the vice-chancellor’s office at Old Schools tomorrow (25/2). ●

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Open letter on the University's application for an injunction to prevent protests for Palestine at Senate House and other administrative buildings

Open letter to the Vice Chancellor of the University of Cambridge

Dear Vice-Chancellor,

We are writing to express our grave concern over the University's application to the High Court for an injunction aiming to prevent "trespassing" at Old Schools, Senate House, Senate House Lawn and Greenwich House through a court order threatening members of the University community and others with imprisonment, fines or the seizure of their assets for taking part in protests or direct action related to "the Palestine-Israel conflict" either on this land, or on the street outside.

We note that the application to the court is made in the name of the "Chancellor, Masters and Scholars of the University of Cambridge" and wish to state publicly and clearly that you are not acting in our name in preparing such an assault on freedom of expression. Rather, this injunction runs contrary to the collective rights and interests of the University community as a whole to debate, assemble and protest in order to hold those in authority to account.

In addition, the creation of special repressive powers targeted at protests related to the "Palestine-Israel conflict" is inherently discriminatory and unfair, and will disproportionately affect Palestinian and pro-Palestinian students and staff. The fact that you are seeking an injunction which will be in force until 2030, two years after current first year undergraduates have completed their degrees, threatens the rights of future cohorts of students to act in accordance with their beliefs.

We wish to remind you that the demands raised by students in solidarity with the Palestinian people have wide support from members of the University community. These include thousands of staff, students and alumni who have signed public statements in support of the demands of the encampment for Palestine and hundreds who have regularly taken part in protests in these exact locations as part of an ongoing campaign calling on the University to divest from companies and institutions complicit in violations of international law and crimes against humanity in Gaza and elsewhere.

Yet under the terms of the injunction as drafted by your administrators, the presence of even a small gathering outside Old Schools or Senate House in order to hand in a petition might be considered in breach of the court order if it "slowed down" access to the land in question. If a graduating student decided to hold up a Palestinian flag or revealed a placard during a Degree Congregation they could be sent to jail or face the seizure of their assets.

This kind of authoritarian reflex has no place in the governance of a University, which by its nature must be a space where dissenting opinions can be expressed without fear of heavy-handed repression. The freedom to question the decisions of the powerful and challenge

injustice is an essential component of academic freedom - without it, the Congregations you claim to be protecting from “disruption” and “trespassers” risk becoming a meaningless charade.

We call on you to withdraw this injunction and reaffirm the University’s commitment to protect the freedom of speech and assembly of its members.

*Notes and background information: **The University's submission to the High Court has been published [here](#) and is due to be heard on 27 February 2025. An initial set of signatures will be sent to the Vice Chancellor's office at Old Schools at 4pm on Tuesday 25 February.***

This petition has been drafted by current members of Regent House and students. Individual student signatories will not be named in the published version of this statement, members of staff and alumni may choose whether to make their names public.

[Sign in to Google](#) to save your progress. [Learn more](#)

* Indicates required question

Title

Your answer

First name

Your answer

Last name

Your answer

CRSID

Your answer



Organisation or student society

Your answer

Are you signing on behalf of your organisation?

- Yes
- No, I'm signing as an individual member

Are you a current member of the University? *

- Yes
- No

Status *

Choose 

Email address (for updates on the campaign - will not be published)

Your answer

I consent for the organisers of the statement to process my data for the purposes *
of collating signatures and conveying them to the University

- Yes



I consent for my name and affiliation to be made public *

Yes

No

Submit

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Cambridgeunistaff4palestine

Open letter on the University of Cambridge's application for an injunction to prevent protests for Palestine at Senate House and other administrative buildings

An urgent appeal from members of the University community



CAMBRIDGEUNISTAFF4PALESTINE
FEB 23, 2025



Share



Open letter to the Vice Chancellor of the University of Cambridge

Dear Vice-Chancellor,

We are writing to express our grave concern over the University's application to the High Court for an injunction aiming to prevent "trespassing" at Old Schools, Senate House, Senate House Lawn and Greenwich House through a court order threatening members of the University community and others with imprisonment, fines or the seizure of their assets for taking part in protests or direct action related to "the Palestine-Israel conflict" either on this land, or on the street outside.

Cambridgeunistaff4palestine

We note that the application to the court is made in the name of the “Chancellor, Masters and Scholars of the University of Cambridge” and wish to state publicly and clearly that you are not acting in our name in preparing such an assault on freedom of expression. Rather, this injunction runs contrary to the collective rights and interests of the University community as a whole to debate, assemble and protest in order to hold those in authority to account.

In addition, the creation of special repressive powers targeted at protests related to the “Palestine-Israel conflict” is inherently discriminatory and unfair, and will disproportionately affect Palestinian and pro-Palestinian students and staff. The fact that you are seeking an injunction which will be in force until 2030, two years after current first year undergraduates have completed their degrees, threatens the rights of future cohorts of students to act in accordance with their beliefs.

We wish to remind you that the demands raised by students in solidarity with the Palestinian people have wide support from members of the University community. These include thousands of staff, students and alumni who have signed public statements in support of the demands of the encampment for Palestine and hundreds who have regularly taken part in protests in these exact locations as part of an ongoing campaign calling on the University to divest from companies and institutions complicit in violations of international law and crimes against humanity in Gaza and elsewhere.

Yet under the terms of the injunction as drafted by your administrators, the presence of even a small gathering outside Old Schools or Senate House in order to hand in a petition might be considered in breach of the court order if it “slowed down” access to the land in question. If a graduating student decided to hold up a Palestinian flag or revealed a placard during a Degree Congregation they could be sent to jail or face the seizure of their assets.

This kind of authoritarian reflex has no place in the governance of a University, which by its nature must be a space where dissenting opinions can be expressed without fear of heavy-handed repression. The freedom to question the decisions of the powerful and challenge injustice is an essential component of academic freedom - without it, the Congregations you claim to be protecting from “disruption” and “trespassers” risk becoming a meaningless charade.

We call on you to withdraw this injunction and reaffirm the University’s commitment to protect the freedom of speech and assembly of its members.

Add your name to this open letter [here](#)

As of 5pm, Monday 24 February, the letter had been signed by nearly 900 people including:

- 171 current members of staff within the Collegiate University
- 402 current students
- 200 alumni

Notes and background information: **The University's submission to the High Court has been published [here](#) and is due to be heard on 27 February 2025.**

This open letter has been drafted by current members of Regent House and students. An initial set of signatures will be sent to the Vice Chancellor's office at Old Schools at 4pm on Tuesday 25 February.

Names of staff who opted to make their signatures public will be posted here after the letter has been sent to the Vice Chancellor's office. Individual student signatories will not be named in the published version of this statement, members of staff and alumni may choose whether to make their names public.

Thanks for reading
Cambridgeunistaff4palestine! Subscribe to
receive updates from our campaigns.

1 Share



Open letter in support of the Cambridge student encampment for Palestine from members of the University of Cambridge community

Staff, students and alumni of the University and Colleges say disclose, divest, reinvest and protect

MAY 11, 2024 • CAMBRIDGEUNISTAFF4PALESTINE

Members of Cambridge University governing body trigger vote on arms divestment

Regent House Grace calls for action

AUG 6, 2024 • CAMBRIDGEUNISTAFF4PALESTINE

Cambridge open letter delivered: now for the next steps in our campaign for disclosure and divestment

Tuesday 14 May saw the delivery of our open letter to Pro Vice Chancellors Bhaskar Vira and Kamal Munir at Old Schools.

MAY 18, 2024 • CAMBRIDGEUNISTAFF4PALESTINE



[See all >](#)

Union and leading campaigners condemn Cambridge Uni attempt to quash peaceful protest through the High Court

26 February 2025

The University and College Union (UCU) today joined Liberty and the Palestine Solidarity Campaign in condemning an attempt by the University of Cambridge to place legal restrictions on all pro-Palestine protests for five years through an application to the High Court for an injunction, due to be heard tomorrow (Thursday 27 February).

UCU said the move by Cambridge bosses was a shameful attack on basic democratic rights including freedom of speech and freedom of assembly and risked setting a repressive legal precedent which could be used to shut down peaceful protest at universities across the country.

Liberty said injunctions and wider repression on campus show that universities are infringing on students' rights and creating a hostile space for those speaking up for social change. The Palestine Solidarity Campaign added that Cambridge was singling out Palestinian staff and students and those defending international law.

In the University of Cambridge's claim at the High Court, it defines as the defendants anyone who "*for a purpose connected with the Palestine-Israel conflict, without the claimant's consent*" protests on or "slow[s] down" access to several central administrative and ceremonial university premises. Cambridge, moreover, has asked for the injunction to be in place until February 2030. [NOTE 1]

UCU believes that Cambridge's claim and the breadth of its clauses risk criminalising non-disruptive peaceful protest in the centre of the city, for local residents as well as students and staff. [NOTE 2]

This High Court claim by the University of Cambridge comes in the context of a wider crackdown on the right to protest, from both university managers and the state. A recent investigation by *Liberty Investigates* and *Sky News* found that since 7 October 2023 up to 113 students and staff across at least 28 universities have been placed under investigation for pro-Palestine protests, with at least nine universities having received briefings on protests from private intelligence and security outfits. [NOTE 3]

Jo Grady, UCU General Secretary, said: "This is a shameful attack on basic democratic rights from Cambridge bosses, and we condemn it in the strongest possible terms. In pleading with the High Court to restrict the ability of its students to peacefully protest against genocide, Cambridge is undermining the fundamental values of higher learning and making a mockery of its reputation as an open institution.

"Worse, in its repressive legal move against freedom of speech and freedom of assembly, Cambridge risks setting a precedent which could be used to shut down peaceful protest at universities across the country."

Ruth Ehrlich, Liberty Head of Policy and Campaigns, said: "In recent years, new laws have made it increasingly difficult for people to exercise their right to protest, and it's alarming that this crackdown is playing out on university campuses too. As these injunctions and recent findings from Liberty Investigates show, universities are infringing on students' rights by creating a hostile space for people simply trying to make their voices heard on an issue that matters to them.

"Students have long been at the forefront of movements for social change. It's vital that their right to protest on campus is protected."

Ben Jamal, Palestine Solidarity Campaign Director, said: "The attempts by the University of Cambridge to prevent peaceful protests on campus in solidarity with Palestine represent a significant attack on democratic rights. The University is trying to single out Palestinian staff and students and those speaking up for international law, and subject them to draconian restrictions that undermine the principles of freedom of expression and assembly that should be a cornerstone of university life."

Clement Mouhot, Cambridge Professor of mathematical sciences, said: "This is nothing short of an all-out attack on freedom of expression and assembly, and the right to protest. Our students have been organising non-violent demonstrations for more than a year against the ongoing genocide in Gaza: their most "radical" demand has been a ceasefire as well as calling for an end to massacres of civilians and illegal occupation.

"The claim by Cambridge managers that these peaceful protests are rejected by the university community is utterly false: on the thousands upon thousands of staff, students and alumni have signed open letters in support of their demands. I myself consider the students, in Cambridge and elsewhere, have been the moral conscience of the world by refusing to stay silent in the face of genocide."

Ends

Media Contacts

Ed McNally m: 07476 044449; e: emcnally@ucu.org.uk

www.twitter.com/ucu

NOTES

[1]<https://www.cam.ac.uk/notices/news/claim-form-particulars-of-claim-and-associated-application-in-connection-with-the-universitys-claim>

[2]An interim injunction granted at the High Court in response to a claim by the University of London late last year was, while still an affront to the right to protest, narrower in scope, naming only those connected to specific protest groups and with a duration of one year:

<https://www.london.ac.uk/sites/default/files/Claim-No-PT-2024-000893-Claimants-Skeleton-for-29-10-24.pdf>

[3]<https://www.theguardian.com/education/2025/feb/22/lobbying-led-uk-universities-adopt-us-style-security-gaza-protests-emails>

Last updated: 26 February 2025

Subject: Urgent Request for University Meeting [M&R-CLIENTDMS.FID3724486]

----- Forwarded message -----

From: CU Palestine Solidarity Society <cupalestinesoc@gmail.com>

Date: Fri, 21 Feb 2025 at 11:24 am

Subject: Urgent Request for University Meeting

To: [REDACTED] <[\[REDACTED\]@cambridgesu.co.uk](mailto:[REDACTED]@cambridgesu.co.uk)>

Dear [REDACTED],

I hope this email finds you well,

I am reaching out in light of the recent injunction threats from the university (not sure how much you know about them). Basically I wanted to see if there is any way the SU, as the students' representative body, is able to urgently raise a meeting with the University to express serious concern with these proposed policies as they are unreflective of the students' views and seriously threaten basic freedoms of expression that particularly target pro-Palestinian students much of whom identify as ethnic and racial minorities and as such this is a discrimination issue.

This is highly time sensitive so please let me know if such an urgent meeting with the University can be set up either today or Monday, or equally if there is someone else in the SU I should reach out to about this.

(I have reached out over WhatsApp too but thought to email as well as I wasn't sure the best way to communicate given the urgency of the request).

Best wishes,

[REDACTED]

If our account details change, we will never notify these to you by email. If you have any doubt whatsoever then please contact us by telephone as soon as possible for verification.

 Please consider the environment - do you really need to print this email?

Mills & Reeve LLP

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← Post



Cambridge for Palestine
@cam4palestine



Join us on Saturday.
If they come for us in the morning they will come for you in the evening.

<p>RALLY: SATURDAY 01/03 11 AM GREAT ST. MARY'S</p> <p>LONG LIVE THE STUDENT INTIFADA. LONG LIVE PALESTINE.</p>	<p>The University of Cambridge may seek to weaponise legal tools and bureaucracy against us, but in doing so, it will only further alienate itself from students, faculty, and people of conscience who refuse to remain silent at an institution entrenched in violence.</p> <p><small>Disclose. Demand.</small></p>
--	---



Cambridge for Palestine @cam4palestine · 20h

x.com/cam4palestine/...

<p>University filed for a 9-year injunction to criminalise protests for Palestine on or around Senate House, Old Schools, and Greenwich House, threatening its own students with imprisonment and fines for protesting genocide.</p> <p>(i) An order that until 12 February 2030 the Defendants must not, without the consent of the Claimant:</p> <ul style="list-style-type: none"> a. Enter, occupy or remain upon the Land; b. Block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land. 	<p>2. The Defendants are comprised of Tenets Colleges, who purport to be students of the University, protesting in relation to the Israel/Palestine conflict and the University's alleged complicity in the actions of the Israeli Defence Force, such as by its involvement in and research arrangements with the defence industry. Many of them appear to be</p> <p>Defining the "Defendants" as anyone protesting "in relation to the Israeli-Palestine conflict and the University's alleged complicity in the actions of the Israeli Defence Force," Cambridge seeks to single out and criminalise anyone protesting for Palestine, continuing its pattern of racist targeting.</p> <p>By the terms of its claim, something as simple as the struggle even when the coscience</p>
<p>(ii) Even if it were found that an injunction would amount to an interference with the Defendants' Article 10/11 ECHR rights by a public authority, any such interference would be justified in that:</p> <p>The claim attempts to justify the use of an injunction "even if" it interferes with students' "rights to freedom of expression and assembly."</p> <p>To meet peaceful civil disobedience with violent policing and criminalisation sets a chilling precedent for academic freedom at large, following the lead of US and UK</p>	<p>"It will be hot", under the tag line "It's 1948 hot tips, 1948 hot tips". Similarly, even after the ceasefire between Israel and Hamas was announced on 15 January 2025, Cambridge for Palestine announced the following on its social media channels on 19 January 2025:</p> <p>"CELEBRATE TODAY... LIBERATION TOMORROW..."</p> <p>We commit to continuing the struggle from the belly of the beast, in unapologetic solidarity with the pursuit of a free Palestine, from the river to the sea.</p> <p>As we speak, the Zionist occupation continues to make Gaza unliveable, Palestinian prisoners are being from barred release, and the West Bank is under military attack with over 40,000 indefinitely displaced. Cambridge's moves</p>

3:17 pm · 25 Feb 2025 · 142 Views

CAMBRIDGE'S CLAIM

In a claim dated 12 February, Cambridge University filed for a 5-year injunction to **criminalise** protests for Palestine on or around Senate House, Old Schools, and Greenwich House, threatening its own students with **imprisonment and fines** for protesting genocide.

- (1) An order that until 12 February 2030 the Defendants must not, without the consent of the Claimant:
- a. Enter, occupy or remain upon the Land.
 - b. Block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land.
 - c. Erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.



Disclose.
Divest.

EXPLICITLY TARGETING THE PALESTINE MOVEMENT

2. The Defendants are comprised of Persons Unknown, who purport to be students of the University, protesting in relation to the Israel-Palestine conflict and the University's alleged complicity in the actions of the Israeli Defence Force, such as by its investments in and research arrangements with the defence industry. Many of them appear to be

Defining the “Defendants” as anyone protesting “in relation to the Israel-Palestine conflict and the University’s alleged complicity in the actions of the Israeli Defence Force,” Cambridge seeks to single out and criminalise anyone protesting for Palestine, continuing its pattern of racist targeting.

By the terms of its claim, something as simple as a graduating student waving a Palestinian flag outside of their Senate House ceremony could constitute “obstruction.”



Disclose.
Divest.

DANGEROUS PRECEDENT FOR POLITICAL SPEECH

25. Even if it were found that an injunction would amount to an interference with the Defendants' Article 10/11 ECHR rights by a public authority, any such interference would be justified in that:

The claim attempts to justify the use of an injunction “even if” it interferes with students’ “rights to freedom of expression and assembly.”

To meet peaceful civil disobedience with violent policing and criminalisation sets a chilling precedent for academic freedom at large, following the lead of US and UK universities that have turned campuses--spaces of learning and expression--into hostile environments for any meaningful exchange.



Disclose.
Divest.

“EVEN AFTER THE CEASEFIRE”

The University’s claim expresses surprise at the fact that our movement remains committed to our struggle “even after the ceasefire.”

“We will be back”, under the tag line “We Will Not Stop. We Will Not Rest”. Similarly, even after the ceasefire between Israel and Hamas was announced on 15 January 2025, Cambridge for Palestine announced the following on its social media channels on 18 January 2025:

“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.”

As we speak, the Zionist occupation continues to make Gaza unliveable, Palestinian prisoners are being from barred release, and the West Bank is under military attack with over 40,000 indefinitely displaced. Cambridge’s moves distract from the core issue: its ongoing moral and material complicity in genocide as Israel violates basic commitments and US politicians greenlight the ethnic cleansing of Gaza.



Disclose.
Divest.

Terms of Admission for Undergraduates at the University of Cambridge: October 2024 entry
(These Terms apply to [Undergraduate](#) students commencing their studies in October 2024)

Application of these terms

1. If you accept your offer for study at Cambridge, you agree that these Terms of Admission apply to your relationship with the College offering you a place (“your College”) and the University (unless paragraph 3 below applies to you). These Terms of Admission apply until you cease to be an undergraduate student.
2. Please note that some of these Terms (paragraphs 13, and 36-42) relate to conditions you will need to meet before you are able to take up your place.
3. The Terms of Admission are reviewed annually. If you have been offered a deferred place for entry in a future year, or decide at some future point to defer your entry, these Terms of Admission will apply until they are replaced by a new set of Terms of Admission that will apply for your year of admission. These revised Terms of Admission will then govern your relationship with your College and the University until you cease to be an undergraduate student. These may be different from the current ones and will be provided to you before you take up your place at Cambridge. If you are not satisfied with the revised Terms of Admission, you may cancel your place without penalty in accordance with paragraphs 50-51.

Membership of the University and your College

4. As an undergraduate student at Cambridge you will be a member of and have separate but interdependent relationships with both the University and your College.
5. You must remain a member of a College throughout your course and it is important to be aware that:
 - (i) Admission to both your College and the University is managed through your College. The Colleges are independent of the University, and of each other. You cannot normally move to another College after matriculation (please refer to paragraph 18 of these Terms where we explain the matriculation process).
 - (ii) You will be unable to pursue your degree course if either your College or your University membership is terminated for any reason, including for breaches of College or University regulations on student discipline and conduct.
 - (iii) You must adhere to the Statutes and Ordinances, and other rules, regulations, procedures and policies of both your College and the University, as notified to you now or as set out on the University or College website (as amended, updated or supplemented from time to time in accordance with these Terms of Admission). This includes matters relating to discipline, capability to study and fitness to practise for certain regulated professions. Permanent or temporary exclusion, arising from breaches of Statutes and Ordinances, or other rules, regulations, procedures and policies of either your University or your College will result in your being unable to pursue your studies at both the University and your College.
 - (iv) University and College rules, regulations and policies are reviewed regularly and may be amended, updated or supplemented from time to time: the University and College websites will always reflect the current procedures (see Annex).
 - (v) Attendance at the small group tuition sessions (“supervisions”) and any other support organised by your College is an essential part of achieving your degree. You must pursue your studies diligently as advised by your College Director of Studies and your Tutor. You may be prevented,

subject to applicable appeal procedures, from continuing your course at the University if your academic performance is judged by your College to be unsatisfactory.

Fees

6. Your fees cover the core provision of your course. In broad terms, your College is responsible for providing supervisions, libraries and local support mechanisms for your general welfare, whilst the University organises lecture programmes, practicals and laboratory work, libraries, University-wide support services, examinations and the award of degrees.
7. Your offer letter will have outlined on what basis your fees have been calculated. This will include a classification of you as either a “Home” student or an “Overseas” student and additionally will identify if you qualify for the government-regulated undergraduate tuition fee. This classification will remain the same for the duration of your course of study except in exceptional circumstances.
8. Unless otherwise specified in your offer letter, annual fees for Overseas students (which include a tuition fee and a College fee) remain fixed at the rate set in the first year of the course for the full duration of the course, providing that you do not intermit your studies for more than six consecutive terms (please refer to paragraph 43(i) of these Terms for further information on the academic year).
9. If you have been classified as a Home student **and** qualify for the government-regulated undergraduate tuition fee, you will be charged a single tuition fee for each academic year. This fee is subject to a cap which is set by the government, which may change during your studies. Your tuition fee might change each year in line with future government policy. Your total tuition fees over the course of your studies will be the total sum of the maximum regulated fee for each year of your study (together with additional course costs, see below).
10. If you have been classified as a Home student but do not qualify for the government-regulated undergraduate tuition fee, you will be charged a tuition fee and a College fee. These fees are set annually by the University and your College and you should expect them to rise each year. The level of any annual fee increases will be determined by a range of factors including in particular rises in the overall costs of an undergraduate education, changes in government and other funding and the UK inflation rate (using RPIX as an indicator). The combined annual fee would not be expected to increase by more than 15% (and will often be less than this). Notification of increases in University fees are published on the University website (<https://www.afpa.admin.cam.ac.uk/fees/fee-schedules>) no later than 30 June in the academic year preceding the academic year to which the increased fee relates. Your total fee payments over the course of your studies will depend on your personal circumstances, your College, your chosen course, and the length of your course, as well as the factors mentioned above, such as rises in overall costs, prevailing inflation and any changes by the UK government (together with additional costs, see below).
11. Fees are payable for each term in which you are in residence, or engaged in a course of study at the University, for twenty-one days or more of Full Term (<https://www.admin.cam.ac.uk/univ/so/pdfs/2022/ordinance01.pdf>, p.155). If you are personally liable for the payment of fees, failure to pay by the date set by your College may result in your not being permitted to continue your studies or to receive your degree.

Additional Costs

12. In addition to the fees outlined above, you may need to meet additional costs for field trips and excursions, placements and years abroad. The University has highlighted this in the advance information given about the course on its website (<https://www.undergraduate.study.cam.ac.uk/courses>). There are other general study costs that apply across all courses, and you can find details of these on our website (www.undergraduate.study.cam.ac.uk/study-costs).
13. You will be expected to have appropriate finances to support all your living costs and may be asked to provide evidence of this in advance. These finances include (but are not limited to):
- accommodation (either provided through your College or privately, and involving combined or separate costs for rent, utility services such as gas, electricity and access to phone and internet systems, and payments for other services such as kitchens, laundries, gym etc.);
 - food (whether provided by your College or through self-catering);
 - personal expenses while you are in Cambridge (e.g. clothes, leisure activities, travel, membership of clubs and societies etc.); and
 - travel to and from Cambridge.

Neither the University nor your College accepts responsibility for any personal debt you may incur.

Changes to your course and related services and facilities

14. The University and your College will provide the teaching and related educational and other services and facilities required for your course as described on the University website (<https://www.undergraduate.study.cam.ac.uk/courses>) immediately prior to the date you accepted your offer of a place, and the material information referred to in your offer letter.
15. Each of the University's Faculties and Departments may provide additional information to supplement the material information (outlined in paragraph 14 of these Terms) in the prospectus and in handbooks (available in print and online). The University will endeavour to ensure that this further information on the course is accurate and as described in these documents but given these are published in advance you should check the University website as per paragraph 14 which will be up-to-date.
16. Very occasionally, there may be circumstances outside the University's and/or your College's control which make it necessary to make changes to your course or to related educational and other services and facilities or buildings. The University and your College will act reasonably in the circumstances to ensure that the changes are kept to a minimum and will make you aware as soon as reasonably practicable of such changes (see paragraphs 16(ii) and 16(iii)).
- (i) The circumstances where such changes may arise are as follows:
- developments in the subject area;
 - student feedback; or
 - changes to the requirements or guidance of a professional, statutory, regulatory or accrediting body.

The changes that the University or your College may make as a result of the above circumstances are to:

- areas of research or other project;
- the identity of supervisor(s) or arrangements for supervisions;

- the availability, duration, location and content of placements and other work-based learning opportunities;
 - the delivery of services and facilities in a different way, from a different location or online or by replacing them with alternative but equivalent services and facilities; Or
 - only if unavoidable will the content or amount of teaching, or format and mode of assessment of your course be changed.
- (ii) Your Faculty or Department will consult students, through the formal student representation channels, on the impact of any substantive changes to your course prior to implementation. Any substantive change to a course requires approval by the University's Education Committee, in line with policies and procedures approved in advance by that Committee. That Committee is always concerned to ensure that no student is disadvantaged by any course change. The Education Committee includes student representatives.
- (iii) You will be notified of these changes by the University, or by your College, as soon as reasonably practicable. They will if necessary draw your attention to opportunities to register a concern or complaint about the changes.

Changes to Statutes, Ordinances, Regulations and Procedures

17. The University and your College may add to, delete or make reasonable changes to the Statutes and Ordinances, and other rules, regulations, procedures and policies where, in the opinion of the University and/or your College, this will assist in the proper delivery of education.

Changes are usually made for one or more of the following reasons:

- (a) to ensure they are fit for purpose;
- (b) to reflect changes in the external environment, including legal or regulatory changes, changes to funding or financial arrangements or changes to government policy, requirements or guidance;
- (c) to incorporate sector guidance or best practice;
- (d) to incorporate feedback from students; and/or
- (e) to aid clarity or consistency of approach.

Wherever possible, the University or your College will consult students, through the formal student representation channels, on the impact of any substantive changes prior to implementation.

Any changes will normally come into effect at the start of the next academic year, although may be introduced during the academic year where the University or your College reasonably considers this to be in the interests of students or where this is required by law or other exceptional circumstances. The University and your College will take all reasonable steps to minimise disruption to students wherever reasonably possible, for example, by giving reasonable notice of changes to Statutes and Ordinances, and other rules, regulations, procedures and policies before they take effect, or by phasing in the changes, if appropriate.

The updated Statutes and Ordinances, and other rules, regulations, procedures and policies will be made available on the University's or College's website and may be publicised by other means so that students are made aware of any changes.

Matriculation

18. On arrival you will be enrolled into the University through a process which in Cambridge is called “Matriculation”. This requires you to sign the following declaration within four weeks of your arrival:-

‘I promise to observe the Statutes and Ordinances of the University as far as they concern me, and to pay due respect and obedience to the Chancellor and other officers of the University.’

By taking up your place at the University of Cambridge you agree that you will sign this declaration on Matriculation, which refers to the Statutes and Ordinances of the University in force and which are amended from time to time. The current Statutes and Ordinances can be found on the University website (see Annex for a link to these). These are under continual review and changes to the Statutes and Ordinances are highlighted on this same website.

Matriculated students have access to such University services as the Careers Service, the University support and wellbeing services and University sports facilities.

Computing Facilities

19. By taking up your place at Cambridge you agree to sign the following declaration in order to access the University’s computing facilities, which will provide access to the internet, your University e-mail account, and information which is available only to University users:-

“I have read the rules and understand that allocations of computing resources are made and may only be used subject to the Rules issued from time to time by the University of Cambridge Information Services Committee, and I agree to abide by such rules. (The Rules and Guidelines on the use of University Information Services facilities are on the World Wide Web, see <https://help.uis.cam.ac.uk/policies/governance-and-policy-documents>).

N.B. It is sometimes the case that system staff will need to look at your account(s) or how you access your account(s) to solve system problems, because of suspected misuse of your account or to enable the legitimate business of the University to continue in your absence.”

You will not be able to pursue your studies effectively to obtain your degree without access to the University’s Information Services. Please note that these rules may change between now and the date of your matriculation: you are advised to re-read them close to that date.

Intellectual Property Rights in your work

20. Ownership of intellectual property (IP) rights (broadly defined, whether registrable patents or not) in material devised, made or created by you normally rests with you; and the University does not ordinarily claim the ownership of such intellectual property rights. However, you need to be aware that this is not always the case and that the University or a third party will claim ownership where:

- (i) IP rights are allocated to the University or funders by grants or contracts for research funding or student sponsorship; or
- (ii) IP rights are owned by third parties; or
- (iii) working in collaboration with others (e.g. University staff) you jointly devise, make or create joint or interdependent intellectual property; or

- (iv) legislation, regulations or ethical guidelines apply e.g. where the use of data is derived from human subjects (e.g. clinical trials) or to personal data.

In such circumstances, relevant third party terms will apply to your work whether or not you have explicitly agreed to them. It is therefore important before you accept a place at the University and before you start work on a research project or join a research group, that you check any relevant third party terms and consider how such terms will affect the treatment of intellectual property that you create.

If you have any concerns, including not receiving any information about intellectual property rights, you must raise them with your proposed supervisor or your Faculty or Department so that you understand how intellectual property which might arise from your studies, research or project(s) will or may be treated.

The University endeavours where possible to ensure you retain the right to use intellectual property in academic teaching, publications and academic research.

The Regulations on Intellectual Property Rights in [Chapter XIII of the University's Statutes and Ordinances](#) as amended from time to time set out how intellectual property rights are managed.

Data Protection

21. When you applied to become a student you were told how the University and the relevant College(s) would use your personal information (meaning any information which relates to or identifies you as an individual) to process your application and for related purposes.
22. Further statements (from both the University and your College) setting out how your personal information will be used when you are a student are identified in the Annex. Please note, however, that these statements may change between now and the date of your matriculation: you are advised to re-read them on the websites close to that date.
23. By taking up your place to study at Cambridge, you acknowledge that the University and your College will use and process your personal information in accordance with these statements. In addition to the information published there, when you use specific services and facilities offered by the University or your College, you will be told about any other uses of your personal information.
24. While studying at Cambridge, you may need to use and handle the personal information of others in connection with your studies and research. You acknowledge that you will handle any such personal information carefully and securely, and in accordance with any reasonable guidance and direction you may receive.

Complaints

25. If for any reason you wish to complain about any aspect of your University experience, the formal procedure is contained in [Section 26 of Chapter II of the University's Ordinances](#). However, if you have concerns, it is advisable to raise them as soon as possible with your College Tutor or Director of Studies, or to the part of the University concerned, to see if the matter can be resolved more quickly and easily through informal channels. Further information on complaints, and on making appeals in relation to examinations, can be found on the University website (see Annex).

26. If you have a complaint about your College, or wish to make a complaint about the admissions process, you should consult your College website for information as to how to bring a complaint (see Annex).
27. You may be able to refer a complaint to the Office of the Independent Adjudicator for Higher Education in England and Wales if the complaint falls within its remit and you have exhausted all internal College and University procedures.

Student misconduct, including physical misconduct, sexual misconduct and abusive behaviour

28. The University and the Colleges are committed to providing an environment that is free from discrimination and affirms the rights of all of their members to be treated with dignity and respect. Any form of physical misconduct, sexual misconduct or abusive behaviour (including harassment of any kind) of one member of their community by another will not be tolerated, irrespective of whether these happen within the University precincts or online or anywhere during the course of a University or College activity. Allegations of these forms of behaviour are taken very seriously and the University and/or your College following an investigation may take action, including disciplinary action, in response to a complaint about a student.
29. The University has specific policies regarding student misconduct, which can be accessed on its website (see Annex).
30. The relevant University and College procedures are reviewed regularly: the websites will always reflect the current procedures.

Discipline

31. The University's regulations on disciplinary matters comprise [Section 20 of Chapter II](#) of the University's Ordinances (see Annex). These include Rules of Behaviour, which apply from the date you accept your offer. Breaching the University's Rules of Behaviour can result in sanctions and/or measures, including the removal of academic awards or permanent exclusion from the University.
32. The University's Rules of Behaviour also include specific provisions relating to academic misconduct, such as cheating in examinations, the use of contract essay services and other forms of plagiarism, e.g. attempting to pass another person's work off as your own. Further guidance on the University's policy against plagiarism can be found on the University's website (see Annex). Your matriculation at Cambridge is deemed as acceptance of the University's right to apply specialist software to your work in examinations and during the course of your studies to aid in detecting such academic misconduct.
33. Your College has its own arrangements regarding discipline, which will be available on its website (see Annex). In exceptional circumstances, your College may apply its disciplinary procedure to applicants holding an offer of a place, which may result in outcomes up to and including the revocation of that offer.

Support and Capability to Study

34. If the University has a concern that your behaviour is adversely impacting your welfare or academic progress, or the welfare of others within the collegiate University community, or has the potential to do so, then you may be referred to the [Procedure to Support and Assess Capability to Study](#). This procedure can result in an assessment by a Study Capability Assessment Committee, which will include a medically qualified person. The Committee may request that you attend a consultation with a relevant expert as

part of an investigation of the circumstances. If you choose not to attend a consultation, this may result in the Committee considering you pose a high risk either to yourself or to the collegiate University community and take appropriate action. You will have the right to attend, be represented and present information to the Committee in writing and orally. The Committee will determine how and whether you continue your studies. The Procedure to Support and Assess Capability to Study is highlighted in the Annex.

35. Your College will have its own arrangements as regards “fitness to study” that are available on its website (see Annex).

Fitness to Practise

36. If you are studying Medicine or Veterinary Medicine you will be registered on the University’s Medical Students Register or its Veterinary Students Register as appropriate.
37. The University has a responsibility to ensure that you will be fit to practise as a doctor, a veterinary surgeon or a teacher on completing your studies. If for any reason associated with your conduct, health or performance there is cause for concern that you may not ultimately be fit to practise, there are procedures, drawn up in the light of guidance from the relevant professional bodies, by which the University will investigate and adjudicate whether you are fit to practise, whether conditions need to be imposed, or whether remedial action needs to be taken. In very rare cases it may be determined that you are not fit to practise and you will not be permitted to continue your course. The procedures for determining fitness to practise are to be found in Sections 28 and 29 of Chapter II in the University's Ordinances.

Disclosure and Barring

38. If you are studying Medicine, you are required to have an Enhanced Disclosure and Barring Service (DBS) check before you begin your course. These checks are subject to a fee, to be paid by you, which is currently £55.40, but is liable to increase. You are also required to subscribe to the DBS Update Service which will ensure your DBS certificate is up to date for the duration of your studies and that it is available to clinical placement providers and other organisations which may need to confirm your DBS status. You have 28 days from receipt of your DBS certificate to register for the Update Service; the cost is currently £13 per year, but is liable to increase. More information can be found on the University website <http://www.cambridgestudents.cam.ac.uk/new-students/rules-and-legal-compliance/disclosure-and-barring-service>.

Unspent Criminal Convictions

39. Having a criminal conviction(s) will not, of itself, prevent you from studying at the University. However, in certain circumstances you must provide full details of your criminal conviction(s) and, where applicable and available, provide copies of probation service or psychologist reports, so we can discharge our safeguarding duties and assess the risk posed to the wider University community. The circumstances for disclosure are as follows:

- (i) If you are studying Medicine you will have provided this information on your conviction(s) to UCAS, but you must also provide full details about your criminal conviction(s) to your College Senior Tutor within 7 days of acceptance of your offer.
- (ii) For all other courses, if you have a ‘relevant unspent’ criminal conviction(s) at the time that you confirm your acceptance of this offer, you agree to provide full details of this to your

College Senior Tutor within 7 days of the date of acceptance of your offer. Information on what constitutes a 'relevant unspent' conviction, and the Criminal Convictions Disclosure Form, can be found at <https://www.undergraduate.study.cam.ac.uk/applying/our-decision/unspent-criminal-convictions>

- (iii) You also agree that if at any time following your acceptance of your offer and during your time at Cambridge, you are convicted of any criminal conviction(s), you will immediately inform and provide full details to your College Senior Tutor and University Faculty or Department of the conviction(s).

You also agree to allow the University and your College to share the details and any information concerning the criminal conviction(s) disclosed by you, and that the University and/or College may request further information.

The University and your College will assess the risks posed by your conviction(s) to students and the wider collegiate University community. Based on this assessment of risk, the University and your College may:

- Confirm your place on your course, provided that you meet any other conditions specified in your offer;
- Attach additional conditions of admission to or study on your course; or
- Cancel our offer and your acceptance.

Visas

40. If you are subject to UK immigration control, you are responsible for ensuring you have the appropriate permission for study purposes. If you do not have valid immigration permission for study, you will not be able to start your course. If your permission expires during your course and you no longer have a valid immigration status that permits study in the UK, the University may be required to withdraw you from your course.
41. If the University is sponsoring your student visa it will inform you separately of your responsibilities to comply with the conditions of the visa and your obligations towards the University in relation to its sponsorship duties. If you breach the terms of your student visa, the University may be required to inform UK Visas and Immigration and you may be withdrawn from your course.
42. The University can only issue a Confirmation of Acceptance for Studies (CAS) to support a student visa application once you have met all of the conditions of your offer and your admission has been confirmed. It is your responsibility to check that all the details on your CAS are correct and up to date before making your student visa application. The University accepts no liability for problems caused by incorrect information on the CAS. Further information about the requirements relevant to students who require a visa can be found at www.internationalstudents.cam.ac.uk/immigration/student-visa

Other Matters

43. There are certain elements of study at Cambridge of which students should be aware:
- (i) Each academic year is made up of three Terms, comprising respectively 80, 80 and 70 days. Within each Term a student must be in residence for, respectively, 60, 60 and 53 days, and the teaching period is concentrated into a specified period of that length, called Full Term. The work expected of

students (including independent study) is therefore intense and students are expected to undertake further study in the vacations.

- (ii) As well as being a member of a College, you are required to reside during Full Term within the University 'precincts', which extend to a three-mile radius of Great St Mary's Church, unless you are given explicit permission otherwise by your College. Most students live in their College or in College-owned accommodation.
- (iii) Normally undergraduates may not bring cars to Cambridge, although in certain limited circumstances a licence to bring a car may be obtained from the Senior Proctor (further information is available at <https://www.proctors.cam.ac.uk/motor-control>).
- (iv) Term-time is demanding and you should not normally undertake paid work during Full Term.
- (v) All courses include supervisions on an individual basis or in small groups. These are organised by your College and you are expected to attend them, and prepare and submit work to your supervisor as required.
- (vi) Courses are not modular and do not carry "credits".
- (vii) Lecturers and class leaders normally own the intellectual property rights in their teaching materials. Students may not record lectures and classes without prior agreement (for example where adjustments are required for a specific learning need). Where sessions are recorded by the lecturer or class leader, you will be notified of this and given further information. You may not share or disseminate any recordings to which you are given access.
- (viii) During your studies you may be given access to confidential information belonging to the University, academics, other students or third parties. This may incur a legal obligation to keep it confidential. In addition, the University or third parties with whom you interact as part of your studies may require you to sign a confidentiality agreement. You may choose to seek your own legal advice if this is the case.
- (ix) The University annually sets out guidance for its examinations (see Annex for the most recent issue). Examination resits are not permitted except in professional examinations, for example, medical and veterinary examinations. Your degree course is known as a "Tripos", and comprises a number of 'Parts'. You are required to pass each Part to continue your studies and will be given a Class (or grade) for each Part. Classes are (generally): First; Upper Second; Lower Second; Third. All successful undergraduate Tripos students (those who have passed all necessary examinations) will be awarded an overall degree classification at the end of their final year.
- (x) Irrespective of what subject you study, you will (assuming you pass the necessary examinations) receive a Bachelor of Arts (BA) degree. Your degree certificate will not specify your overall degree classification or subject, but transcripts setting out your course of study, results for each Part of the Tripos and your overall degree classification can be provided by the Student Registry.
- (xi) If you are awarded the Bachelor of Arts degree, you may proceed without further examination to the Master of Arts degree not less than six years from the end of your first term of residence.

Disability

44. If you have a disability, whether or not you have previously declared it, you may seek the confidential support of the [Accessibility and Disability Resource Centre](#) at any point. Members of staff from the Accessibility and Disability Resource Centre will not normally make further disclosure of your disability within the University or to your College without your consent. It may however affect the University's and your College's ability to make any required reasonable adjustments if information about your disability cannot be shared with those within the University and your College who are required to implement them.

45. Nothing in these Terms of Admission shall limit the University's or your College's liability to you:
- for death or personal injury resulting from negligence (as defined in the Consumer Rights Act 2015);
 - for fraud or fraudulent misrepresentation.

References to legislation in these Terms of Admission include reference to any amendments, extensions or re-enactments of such legislation.

46. Subject to paragraph 45 above and any restrictions in statute or at common law affecting the ability of the University or your College to limit their liability, the aggregate liability of the University and your College under these Terms of Admission or otherwise in connection with your admission to the University and/or your College and/or the provision of your course and other educational or related services and facilities (including pastoral services) by the University and/or your College, whether arising in contract, tort (specifically negligence), statute, or in any other way, shall not exceed the total of the course fees paid and due to be paid by you in relation to your course, as defined in the letter from your College offering you a place.
47. For the purposes of paragraphs 45 and 46, the terms "University" and "College" also include officers, employees and agents of the University or your College, and those paragraphs may be enforced by such officers, employees and agents. It is not otherwise intended that any of these terms will be enforceable by any third party.
48. Neither the University nor your College will be liable for matters arising which are outside their control and which could not have been prevented even if reasonable care had been taken. This includes, but is not limited to: strikes, other industrial action, staff illness, severe weather, fire, civil commotion, riot, invasion, terrorist attack or threat of terrorist attack, cyber-attack, war (whether declared or not), natural disaster, restrictions imposed by government or public authorities, epidemic or pandemic disease, or failure of public utilities or transport systems. In particular, where such event(s) occur and change(s) in accordance with paragraph 16 are not possible or practicable, neither you nor the University nor your College will be liable to the other for breach of this contract nor for continued compliance with the contract including the provision of further tuition or services, payment of further fees, making refunds of fees paid or other loss or damage of any kind.

Incorrect or Incomplete Information

49. The University and/or your College reserve the right to withdraw any offer made, prevent you from proceeding to matriculation or take disciplinary action which may lead to the termination of your studies if any of the information provided by you in relation to your application is found to be incorrect or incomplete, or if you fail to provide satisfactory information or evidence which confirms that you can meet one or more of the conditions contained in your offer letter.

Your Rights to Cancel

50. If you have concerns about taking up your place or pursuing your course, you should in the first instance contact the Admissions Tutor of your College who will be happy to discuss the matter and offer guidance.
51. If for any reason you do not wish to take up your place at Cambridge, you may cancel your place without penalty by informing the Admissions Tutor of your College, in writing (by letter or e-mail) at any time to and including 14 days after the date on which you firmly accepted your offer of a place, that you will

not be taking up your offer. You may instead use the Cancellation Form found at the following link, but you are not obliged to do so: www.cam.ac.uk/cancellation

General

52. If any provision of the Terms of Admission is or becomes illegal, invalid, void or unenforceable that shall not affect the legality, validity or enforceability of the other provisions.
53. If you breach these Terms of Admission and the University or your College chooses not to exercise any right which it may have against you as a consequence of that breach, the University or your College shall not be prevented from taking action against you in the future in respect of any other breaches by you.
54. The rights under these Terms of Admission shall not be enforceable by any party who is not a party to it, including any party that is responsible for paying your fees in whole or in part, and no such party shall have any rights under or in connection with the Contracts (Rights of Third Parties) Act 1989.
55. These Terms of Admission shall be governed by and construed in all respects in accordance with the laws of England and the parties agree to submit to the jurisdiction of the courts of England.

Version 2024-1: This document was last reviewed by the University and the Colleges on 4 January 2024. It is expected that the next version of this document (for application in 2024-25) will be agreed and published no later than 31 January 2025.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

BETWEEN:

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

Claimant

and

**PERSONS UNKNOWN AS DESCRIBED
IN THE CLAIM FORM**

Defendants

and

**EUROPEAN LEGAL SUPPORT
CENTER**

Intervener

**THIRD WITNESS STATEMENT OF
EMMA MACHELTD CLARA RAMPTON**

I, **EMMA MACHELTD 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**". This witness statement is my third in these proceedings.
- 2 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.
- 3 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 collating of information from various colleagues within the University.
- 4 There is now produced and shown to me a bundle of documents marked "ER3" to which I refer to in this witness statement. References to page numbers are to pages of "ER3". The exhibit ER3 contains the following documents:

Document description	Date	Page number(s) of ER3
Extracts of Cambridge for Palestine Facebook publications	27 February 2025 - 7 March 2025	1-5
Extracts of Cambridge for Palestine Instagram publications	27 February 2025 – 5 March 2025	6-26
Extracts of Cambridge for Palestine Instagram publications	5 March 2025 – 7 March 2025	27-36
Extracts of Cambridge for Palestine X.com (formerly Twitter) publications	28 February 2025 – 7 March 2025	37-39
Extract of Palestine Action X.com (formerly Twitter) publication	4 March 2025	40
Photographs of rally on 1 March 2025 outside Great St Mary’s Church and Senate House Yard	1 March 2025	41-42
Historic England Official List Entry	N/A	43-46
Photographs of graffiti at The Old Schools	4 March 2025	47-51
Extracts of Palestine Action social media publications	5 March 2025 – 7 March 2025	52-60
Cambridgeshire Live article	4 March 2025	61-64
Varsity article	4 March 2025	65-66
Varsity article	22 June 2024	67-68

Extract of Palestine Action website	2 November 2024	69-72
BBC article	8 March 2024	73-75
Cambridge News article	13 March 2024	76-77
Varsity article	10 November 2023	78-79
The Oxford Student article	1 March 2025	80-83
Extract of European Legal Support Center website	3 March 2025	84-87
Plan of University and College buildings in Cambridge city centre	N/A	88
Plan of University and College buildings in the west of Cambridge	N/A	89
Cambridge University Reporter	24 July 2024	90-94
Link to Instagram video publications	2 March 2025	95
Varsity article	16 February 2024	96-97

The rally on Saturday 1 March 2025

- 5 The group, Cambridge for Palestine, organised a rally, which took place outside Great St Mary's Church, Cambridge on Saturday 1 March 2025. This coincided with the graduation Congregation at Senate House and Senate House Yard on that day. I described in my second witness statement at paragraph 20 that the rally appeared to have been organised in response, or partly in response, to the University's application

for an injunction in these proceedings, interim relief for which was granted at the hearing on Thursday 27 February 2025.

- 6 There are reproduced at **pages 1-19 and 31-39** extracts of social media posts published by Cambridge for Palestine and by other parties, some of which have been endorsed by Cambridge for Palestine by that group similarly publishing the other parties' posts on its social media, which are dated on and between 27 February 2025 and 7 March 2025. Some of these social media publications respond to the Order of 27 February 2025 and the accompanying judgment of Mr Justice Fordham. Also, some of these social media publications show the rally that was convened on Saturday 1 March outside Great St Mary's Church. There is at **page 72** links to the video footage of the rally published by Cambridge for Palestine on its social media, the dates of which are shown with the stills taken from the video footage at **pages 18-22**.
- 7 The video footage shows at least two University graduands participating in the rally outside Great St Mary's Church and Senate House Yard (**page 19**) and speakers with microphones and megaphones. The photographs show a significant number of people participating in the rally, many carrying Palestine flags and other signs (**pages 19-23**).
- 8 Also, two of the photographs show a graduand standing on the steps outside Senate House and within the Senate House Yard site raising a Palestine banner (**page 24**).
- 9 Paul Oliver, Deputy Security Operations Manager for the University, has confirmed to me that participants in the rally started to convene outside Great St Mary's Church and Senate House Yard at around 10:09am on 1 March, and the number of participants grew, by approximation, to around 100 by 11:20am. I understand that the rally ended at around 12:20pm. There are at **pages 41 and 42** two photographs of the rally taken by members of the security team.
- 10 I understand from Paul Oliver and from my colleagues in the Proctorial team, who conduct the graduation Congregations, that the graduation Congregation on Saturday

1 March was unimpeded by the rally: there was no obstruction of access to Senate House or Senate House Yard, and graduands and their guests were not prevented from entering the site. The rally was peaceful. I understand that a person or persons participating in the rally affixed a banner to the railings of Senate House Yard, but that they cooperated in the removal of the banner when asked to do so by Lucy Lewis, the University's Marshal.

- 11 I wish to make it clear that the senior leadership team of the University do not take any issue with the rally that took place outside and proximate to Senate House Yard on the day of the graduation Congregation, or the demonstration by a graduand within Senate House Yard of the nature described above; these events are not things that the University has sought to prohibit by its application in these proceedings. It is a good thing that the University has students who actively and passionately speak about important issues, and the University remains committed to ensuring that its students and staff exercise their freedom of speech within the law.

Graffiti at The Old Schools on Tuesday 4 March 2025

- 12 Regrettably, in the early hours of Tuesday 4 March 2025, between 1:40am and 4:00am, a person or persons sprayed red paint on the wooden door and the archway masonry of the Gatehouse, the west entrance to the Old Schools from Trinity Lane. The Gatehouse is one of several aspects of The Old Schools which are referenced in the Grade I official listing entry for the building, a copy of which is at **pages 43-46**.
- 13 There are reproduced at **pages 47-51** five photographs of the defaced façade of the Gatehouse, which were taken by one of the University's security team in the morning of 4 March following the incident I describe above.
- 14 As shown in those photographs, the text of the graffiti on the masonry reads,

"DIVEST".
- 15 The text of the graffiti on the wooden door reads,

"ALWAYS RESIST...FREE PALESTINE".

16 A group, Palestine Action, claims responsibility for the graffiti. There are extracts of that group's social media publications, some of which are dated 6 March 2025, reproduced at **pages 53-58**. There are two news articles that report the incident, which are reproduced at **pages 61-68**.

17 Palestine Action, in its social media publication on 4 March 2025, a copy of which is reproduced at **pages 39 and 40** states the following in conjunction with the display of the graffiti at the Old Schools:

“BREAKING: Palestine Action students target Cambridge University’s Endowment Fund offices, demanding the institution divests from companies enabling the slaughter of Palestinians.

The action comes days after the university failed to impose an injunction banning pro-Palestine protests. They can try to stop the student intifada, but they will never succeed.

Resistance until victory!”

18 The group, Cambridge for Palestine, appears to have endorsed Palestine Action's most recent act of damage. One of Cambridge for Palestine's social media publications, which is reproduced at **page 39**, republishes the Palestine Action post that I refer to above, along with the message,

“Divest from Israeli arms or expect resistance. Full support to Palestine Action.”

19 There have been previous acts against the University's property for which Palestine Action has claimed responsibility. From their website, Palestine Action is said to be:

“...a direct action movement committed to ending global participation in Israel’s genocidal and apartheid regime. Using disruptive tactics, Palestine Action targets corporate enablers of the Israeli military-industrial complex and seeks to make it impossible for these companies to profit from the oppression of Palestinians.”

- 20 In the early hours of Saturday 22 June 2024, a person or persons sprayed red paint on the southern façade of Senate House, similarly a Grade I listed building. An article published by Varsity on 22 June 2024 shows a photograph of the graffiti and cites social media publications from Palestine Action as its source for the attribution of the act to, “*Cambridge students, in collaboration with Palestine Action.*” A copy of the article is at **pages 67 and 68**.
- 21 Later in the year, in the early hours of 2 November 2024, a person or persons sprayed red paint on the Alan Reece Building, which forms part of the Institute for Manufacturing. This is situated outside Cambridge city centre and less than one mile from and to the south of Greenwich House. A page from Palestine Action’s website is reproduced at **pages 69-72**, which shows a photograph of the incident and attributes the act to that group.
- 22 The group, Palestine Action has also targeted College property. On 8 March 2024, a person cut the fabric of a painting of Lord Balfour and sprayed red paint on the painting, which was displayed at Trinity College. Palestine Action claimed responsibility for the act. There is at **pages 73-75** a BBC article relating to the incident.
- 23 There have been acts of criminal damage carried out against University property by persons affiliated with groups other than Palestine Action. On 13 March 2024, a person or persons threw red paint on the Maxwell Centre, which is situated near the Alan Reece Building, and applied graffiti to the ground around the building. A group, ‘This is Not a Drill’, claimed responsibility for the incident. An article referring to the incident is reproduced at **pages 76 and 77**. The group is reputed to have said that:
- “...this action is one of hundreds across the country aiming to hold to account academic institutions for facilitating Israel’s occupation of Palestinian land and its genocidal violence against Palestinian people.”*
- 24 The University treats these incidents as criminal acts. Accordingly, it has reported these incidents to the Cambridgeshire Police Constabulary.

- 25 The University acts quickly to remove graffiti, partly, in the case of heritage assets, to minimise the risk of more permanent damage being caused to the building, but, also, to ensure that its employees and students feel reassured that the University protects the environments in which they work and study and otherwise and participate in University life.
- 26 It is relevant that Palestine Action recently claimed responsibility for vandalising the windows of the Blavatnik School of Government, one of the University of Oxford's buildings, which has been reported in various online news articles, including one by Oxford Student, a copy of which is reproduced at **pages 80-83**. This action was endorsed by Oxford Action for Palestine (OA4P) who, as I explained in paragraph 150 of my first statement, appear to be a similar group to Cambridge for Palestine, and one in relation to which Cambridge for Palestine has previously shown its support.

The University's Estate

- 27 I address a point that has been made by some that oppose the University's application. There are some that have said or suggested that the University seeks to suppress political expression on its campus. One example is the article published by the European Legal Support Center on its website in response to the Order of 27 February 2025, a copy of which is reproduced at **pages 84-87**.
- 28 The University does not have a central campus, as such. The University is a collegiate university: there are 31 Colleges, each of which is a separate legal entity with its own property. University-owned property is situated throughout Cambridge city centre as well as outside the city centre. The Colleges also own property throughout the city.
- 29 There is at **page 88** a plan of central Cambridge. The areas shown coloured blue are buildings owned by the University. The areas shown coloured orange are buildings owned by the Colleges. Also, there is an annotation showing the location of Senate House and the Old Schools.
- 30 There is at **page 89** a plan showing the area to the west of Cambridge city centre. As with the other plan, the areas shown coloured blue are buildings owned by the

University and the areas shown coloured orange are buildings owned by the Colleges. Also, there are two annotations showing, respectively, the locations of Greenwich House and Senate House and The Old Schools.

- 31 These two plans illustrate the extent of University and College-owned buildings in and around Cambridge city centre. It is noteworthy that these plans show buildings only; they do not show the green and other extensive outdoor spaces owned by the University and the Colleges.
- 32 I have in my first witness statement, at paragraphs 15 to 26, explained that neither Greenwich House, Senate House nor The Old Schools are areas to which students have general access. In any event, they comprise a comparatively small part of the University's estate, though, admittedly, Senate House and The Old Schools comprise an important and symbolic part of the estate and the administrative core of the University.
- 33 As shown on the plans at **pages 88 and 89**, the University does not apply in these proceedings for an injunction across its estate, or what might be referred to as its campus. This is despite the occurrence of other acts of disruption across the University's wider estate by groups demonstrating in relation to the University's alleged connections to Israel's military action in Gaza. I have referred to some of those incidents above at paragraphs 19 and 23 in relation to the Alan Reece Building and the Maxwell Centre.
- 34 In addition to these incidents and those that I refer to in my first witness statement, there was a separate incident on 9 November 2023. At around 10:05am on that day, a group comprising between 7 and 8 persons wearing face coverings entered the Institute for Manufacturing Alan Reece Building. They proceeded to access the balcony and throw leaflets from it. I have seen the University's security team's log, which records that one staff member activated the panic alarm when the demonstrators entered the building. Also, I have listened to a recording of a telephone call made by one staff member to the University's security team asking that security attend; it is clear that this person was distressed by the incident. There is reproduced

at **pages 78 and 79** an article published by Varsity which refers to the incident. The article attributes the incident to a group identifying themselves as 'FromRiverToSea'.

35 This incident, along with the two encampments at Senate House Yard and the occupation at Greenwich House I refer to in my first witness statement, are unauthorised demonstrations for which these groups, assuming that they are students, have not sought permission from the University in accordance with the University's Code of Practice on Freedom of Speech and related protocols. Nor are they in any event of a nature that the University would or should be expected to authorise should it have received such a request.

36 Allied to that point, however, I confirm that the University has not withheld permission in the last year to any request to hold a student event on University property by persons connected to Cambridge for Palestine or similar groups. If a student wishes to conduct an event on University property, they submit a request which is dealt with by the relevant department of the building in question, or, if the property is centrally managed, to the Student Registry. If the department or Student Registry have concerns about an event, the request is escalated to the Referral Group and it is only the Referral Group that may withhold permission for an event. There have not been any refusals in the past year. For example, recently, on 6 March 2025, the group, Cambridge for Palestine, held an event at Lady Mitchell Hall, Sidgwick Site, which forms part of the University's land. The event was advertised with the description:

"Stop arming Israel... Defend the right to protest" (page 4).

37 It is relevant that there has previously been a demonstration at the Sidgwick Site, in relation to which the University's permission was not sought. On 14 February 2024, at around 13:07pm, demonstrators convened at the site. My colleagues in the security team report in their incident log that approximately 100 people participated in the demonstration, though a Varsity article, a copy of which is reproduced at **pages 96 and 97**, refers to around 300 "students" gathering at the site. A group, Cambridge University Palestinian Solidarity Society, is reputed to have organised the event.

Graduation Congregation and other dates

- 38 At the hearing of 27 February 2025, Mr Justice Fordham raised a specific concern that the Court was not told about graduation Congregations which had taken place, unimpeded, at Senate House and Senate House Yard. Although this was not an intentional omission on my part, I apologise to the Court that this information was not provided. The focus of my first witness statement was on the University events at Senate House and Senate House Yard which had been disrupted, as well as the disruption caused by the occupation of Greenwich House, rather than on those events that had not been disrupted.
- 39 I confirm that, following the first act of disruption at Senate House Yard in May 2024 which caused graduation Congregations to be relocated, and prior to the next similar act occurring at Senate House Yard in November 2024, there were graduation Congregations on the following dates that were not displaced by demonstrators engaging in encampments or similar acts: 19 June 2024 (Honorary degrees) , 26 to 29 June 2024 (inclusive), 18 to 20 July 2024 (inclusive) and 25 and 26 October 2024. Since the hearing on 27 February 2025, as I say in this witness statement at paragraph 10, the most recent graduation Congregation on Saturday 1 March 2025 was not disrupted by demonstrators.
- 40 It is relevant that, during part of the period where no graduation Congregations were displaced by encampments or similar acts, up to 14 August 2024, the group, Cambridge for Palestine, were participating in a significant encampment on the lawn at King's College adjacent to Senate House Yard. The facts relating to this encampment are described in my first witness statement at paragraphs 34 – 36. This encampment was in situ from around 6 May 2024 to 14 August 2024. I refer in my first witness statement, at paragraphs 84-87, to the fact that Professor Kamal Munir, Pro-Vice-Chancellor for University Community and Engagement, and Professor Bhaskar Vira, Pro-Vice-Chancellor for Education, engaged in dialogue with representatives for Cambridge for Palestine during the encampment. The graduation Congregations in June and July 2024 took place while this dialogue was ongoing. Professor Bhaskar Vira has confirmed to me that he made it clear to the

representatives of Cambridge for Palestine that he was speaking to at that time that any acts similar to the encampment at Senate House Yard, which required the University to rearrange its graduation Congregation, would potentially result in the University suspending its ongoing dialogue with the group. In my first witness statement, I also refer to the fact that the encampment at King's College ended on or around 14 August 2024, in part, because the University had agreed with representatives for Cambridge for Palestine that the University would review its approach to investments in, and research funded by, the defence industry, and that a working group would be established to do so, the membership of which would include students.

- 41 The events relating to the occupation of Greenwich House between 22 November 2024 and 6 December 2024 and the encampment at Senate House Yard between 27 November 2024 and 30 November 2024, appear to have been organised, at least, partly, in response to the University's proposals as to membership of the working group, with which Cambridge for Palestine was not satisfied. These events and the relevant online publications are referred to in my first witness statement, at paragraphs 85-97.
- 42 I highlight that, although there were no encampments at Senate House Yard between May and November 2024 which required the University to relocate graduation Congregations, it would not be correct to say that there were no attempts to disrupt these events, or that there was no disruption at all to these events by demonstrations taking place in the areas proximate to Senate House. I have at paragraph 20 above referred to the act of vandalism at Senate House carried out on 22 June 2024, which was only four days before a graduation Congregation was scheduled to take place. The graffiti was removed from Senate House prior to the Congregation taking place.
- 43 The dates for graduation Congregations for the academic years 2024/2025, 2025/26 and 2026/2027 are published online in the Cambridge University Reporter, a copy of which is reproduced at **pages 90-94**. These dates over the course of the next year are:

- 43.1 29 March 2025;
- 43.2 5 April 2025;
- 43.3 3 May 2025;
- 43.4 23 and 24 May 2025;
- 43.5 25 June 2025;
- 43.6 2 to 5 July 2025 (inclusive);
- 43.7 24 to 26 July 2025 (inclusive);
- 43.8 1 October 2025;
- 43.9 24 and 25 October 2025;
- 43.10 29 November 2025;
- 43.11 30 January 2026;
- 43.12 28 February 2026;
- 43.13 28 March 2026;
- 43.14 11 April 2026.

44 Also, in the Summer of 2025, there will be elections for the next Chancellor, where qualifying voters can vote in person in the Senate House on 12 July 2025 and 16 July 2025.

45 It is possible that there will be other events convened at Senate House and Senate House Yard over the course of this academic year and subsequent years, or that some of the dates given above and referred to in the Cambridge University Reporter could be moved.

Identification of the Defendants

- 46 I described in my first witness statement, at paragraphs 127 – 133, the steps that the University had taken to identify students who had participated in the Greenwich House occupation between 22 November 2024 and 6 December 2024 or in either of the encampments at Senate House Yard in May 2024 or November 2024. I confirmed, at paragraph 131, that only one student had been identified in connection with the Greenwich House occupation.
- 47 In addition to that person who appears to have participated in the occupation of Greenwich House, I understand that one of the Colleges has identified a different individual who appears to have participated in the encampment at Senate House Yard in November 2024. I understand that the Head Porter of one of the Colleges identified this person by reviewing photographs that had been collated in connection with the encampment, and this was communicated by the Senior Tutor of the relevant College to the University on 8 January 2025; however, this fact was only brought to my attention on 3 March 2025.
- 48 The University has decided to make complaints to the Colleges of the two identified individuals, and, following receipt of those complaints, it will principally be a matter for the Colleges to decide on whether to instigate any disciplinary action.
- 49 The University remains of the view that neither of these two individuals should be named in these proceedings as the University is not in receipt of evidence to suggest that either intend to carry out further acts of the nature described in my first witness statement and to do so would be to single them out unfairly.

Continuing threat of action

- 50 I remain of the view that there continues to be a risk that persons affiliated with Cambridge for Palestine or with groups that have at their object the same or similar cause, will carry out acts of unauthorised entry on to Senate House and Senate House Yard, the Old Schools and/or Greenwich House for the purpose of disrupting the lawful activities of the University.

51 The group, Cambridge for Palestine, has had ample opportunity to disavow an intention to carry out such acts, yet they have declined to do so. To the contrary, since Mr Justice Fordham’s judgment of 27 February 2025, they have held out the judgment as a “political victory” and one which “affirms their right to protest” (page 2), and they have publicly endorsed the act of vandalism at the Old Schools carried out by Palestine Action on 4 March 2025 (page 39).

52 On 2 March 2025, Cambridge for Palestine uploaded a social media post which reads:

“We will NEVER be silent while they profit From Genocide. Our call remains the same Disclose, Divest, We Will NOT Stop, We Will NOT REST” (page 3)

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:11.March.2025.....

Signed by:

B3E91306D8004AF...

Cambridge For Palestine - Facebook
posts - 28 Feb to 7 March 2025

Source:

https://www.facebook.com/profile.php?id=61560141232344&locale=en_GB

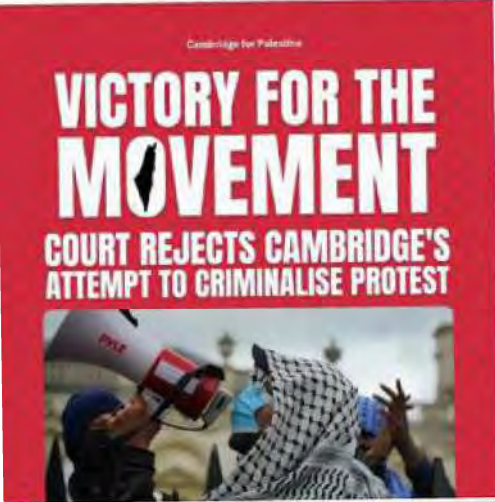
Accessed on 7 March 2025.

MILLS & REEVE

See previous edition for this post:

Cambridge for Palestine
28 February at 10:08 · 🌐

This judgment is a significant political victory, yet the affirmation of our right to protest is the bare minimum. Our struggle for divestment and liberation continues.



On Thursday, the High Court rejected Cambridge University's application for a five-year injunction criminalising any form of protest or direct action relating to Palestine at the University's Senate House, Greenwich House and surrounding areas.

INDEPENDENT
Cambridge University loses bid for long injunction on Israel-Palestine protests

Its lawyers had argued the injunction is "urgently" needed ahead


In response to its demand for a five-year ban on Palestine protests, the Court instead granted a symbolic, two-day restriction on entering Senate House, explicitly protecting protest in the surrounding areas, including our rally scheduled for 1st of March. The judgement drops all mentions of Palestine and CAP, directly contradicting Cambridge's racist attempt to target the movement for

This judgement is a significant political victory for our movement in solidarity with Palestine, and for student political expression at large. The court has revealed that Cambridge's racist targeting of Palestinian identity, and demonisation of students and staff who protest the University's complicity in genocide, is baseless and unacceptable.

In the past week, we have seen vocal solidarity and outrage from thousands across the Cambridge – unity and the wider movement for Palestine, from Cambridge's Student Union, to local and national chapters of the University and College Union and the Palestine Solidarity Campaign.

👍🥰 2 1 comment 1 share

👍 Like 💬 Comment 📧 Send ➦ Share

 **Gerhard Schaupp**
Thank you Justice 🙏

👍 Like 🗨️ Reply

 Cambridge for Palestine is at Great St Mary's, The University Church, Cambridge. 2 March at 23:03 · Cambridge · 🌐

Cambridge students graduate while honoring Palestine, standing in solidarity for justice and freedom.
A powerful moment of resistance, unity, and unwavering support.
Cambridge University tried to silence us.
We will NEVER be silent while they profit From Genocide. Our call remains the same Disclose, Divest, We Will NOT Stop, We Will NOT REST.
[#FreePalestine](#) [#EndApartheid](#) [#CambridgeForPalestine](#) [#GraduationForJustice](#)



🔴 3 4 shares

👍 Like 💬 Comment 📧 Send ➦ Share

753587485_1

2



Cambridge for Palestine

3 March at 17:45 · 🌐

...

The University of Cambridge has been defeated in court on key elements of the injunction, which was targeting student protests against complicity in the Israeli genocide of Palestinians. The uni has laid bare plans to silence its own students rather than cutting ties with genocide and ethnic cleansing.

Come to the Divestment Assembly on 6 March to plan next steps in our campaign, needed now more than ever.

Join staff and students at 4pm, Thursday 6 March, Lady Mitchell Hall, Sidgwick site.

>> Read the press report here on the court case: <https://www.independent.co.uk/.../university-of-cambridge...>



Stop arming Israel Defend the right to protest

Thursday 6 March

Lady Mitchell Hall, Sidgwick Site, 4pm

The University has applied for a High Court injunction which aims to criminalise protest for Palestine in the vicinity of Senate House and other University admin buildings. Come to this meeting to find out what we can do collectively to defend freedom of assembly and build the campaign for divestment from companies.



Like




Comment



Send



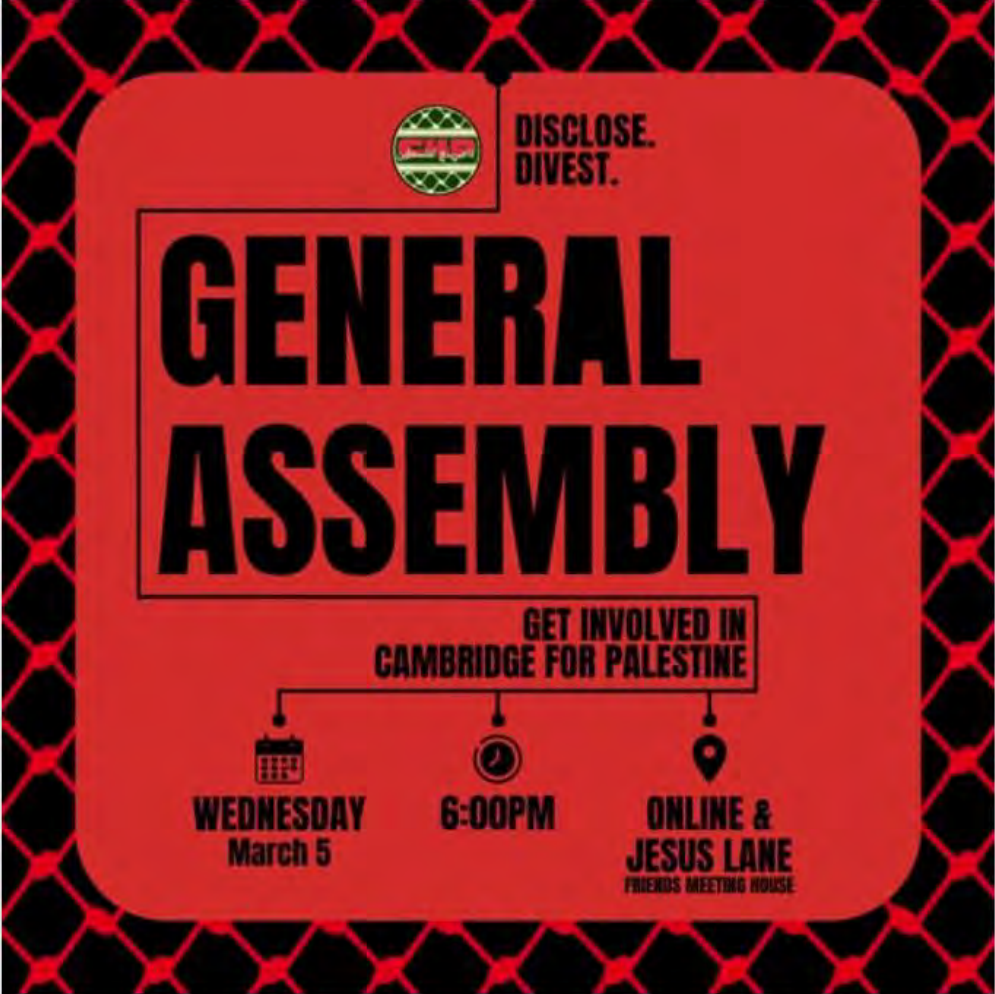
Share





 **Cambridge for Palestine**
4 March at 17:37 · 🌐

General Assembly tomorrow

We will be hosting our weekly General Assembly tomorrow at 6pm at Friend's Meeting House and online. DM to receive the meeting link!

Join in to learn and contribute to our activities and strategic planning moving forward as the University tries to silence our movement. As always, new and old comrades welcome 🍌





 Like  Comment  Send  Share

5 March 2025

Information

**Cambridge For Palestine - Instagram
posts: 27 February- 5 March 2025**

Source: https://www.instagram.com/p/DGi0cj1vZ5r/?img_index=1
Accessed: 5 March 2025

DATE	POST
<p>6 days ago 27 February 2025</p>	 <p><i>Figure 1</i></p>  <p><i>Figure 2</i></p>

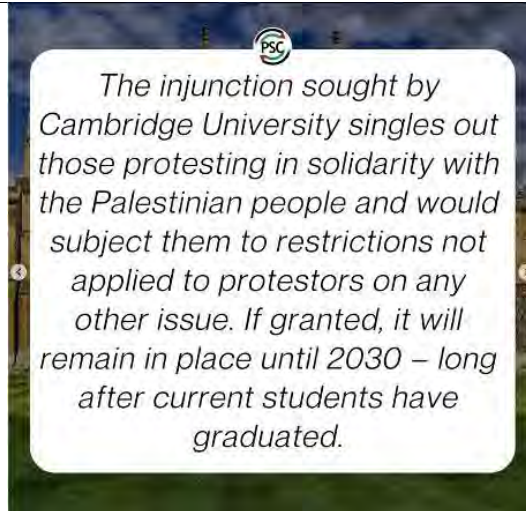


Figure 3



Figure 4



Figure 5



Figure 6



Figure 7



Figure 8



Figure 9



palestinesolidarityuk Tomorrow @cambridgeuniversity will go to the High Court seeking to impose an unprecedented ban on protests in solidarity with Palestine from key sites of the university. This is a major assault on longstanding principles of freedom of expression and assembly on campus.

Together with @ucunion, @libertyhq and others, we are working with staff and students to oppose these draconian and discriminatory measures which would set a new and worrying precedent for freedom of expression and the right to protest.

The principles of freedom of expression and assembly should be a cornerstone of university life. @cambridgeuniversity should drop this attempt to impose repressive restrictions and stop trying to silence those standing up for international law.

Read and share the carousel.

Caption

6 days ago
27 February 2025



Picture



cambridgebmeofficer 🚩 The Right to Protest is Not a Privilege - It's a Fundamental Right! 🚩🚩

Cambridge SU strongly opposes the University's attempt to secure an injunction that would severely limit students' rights to protest, express dissent, and hold institutions accountable.

This sweeping injunction—set to last until 2030—would criminalise peaceful demonstrations not just on University property, but even in surrounding public spaces. The restrictions on assembly, protest, and even handing in petitions set a dangerous precedent for suppressing student activism and silencing voices on critical issues.

🚩 What does this mean?

- ✗ Standing outside Senate House with a sign could be deemed unlawful
- ✗ A student holding up a placard at graduation could face legal action
- ✗ Peaceful demonstrations could result in imprisonment or financial penalties

This is an attack on our fundamental rights. Universities should foster debate, not suppress it through repressive measures.

We demand that the University withdraw this injunction and commit to protecting the rights of students and staff.

🚩 Read the full statement on the Cambridge SU website under News Section!

Caption

6 days ago
27 February 2025



Picture



cambridgeforpalestine and 2 others
Great St Mary's, The University Church, Cambridge

...

Cambridge University is complicit in genocide against Palestinians, through arms investments, partnerships with companies like BAE Systems, Leonardo, and Rolls-Royce, and the active suppression of student protests demanding divestment. We refuse to be silent bystanders.

#CambridgeForPalestine #StopArmingGenocide #RightToProtest
 #FreePalestine #DivestFromApartheid #StudentProtest #SpeakUp
 #PalestineWillBeFree #EndTheOccupation
 #BoycottDivestmentSanctions #BDS
 #StudentsForJusticeInPalestine #SJP #UniversityDivestment
 #CambridgeUniversity #PalestineSolidarity #JusticeForPalestine
 #HumanRights #NoMoreArms #EndTheSilence #Activism
 #Protest #StandWithPalestine #CambridgeStudents
 #CambridgeAction #PalestineAwareness #StopFundingWar
 #BAESystems #Leonardo #RollsRoyce

Caption

5 days ago
28 February 2025

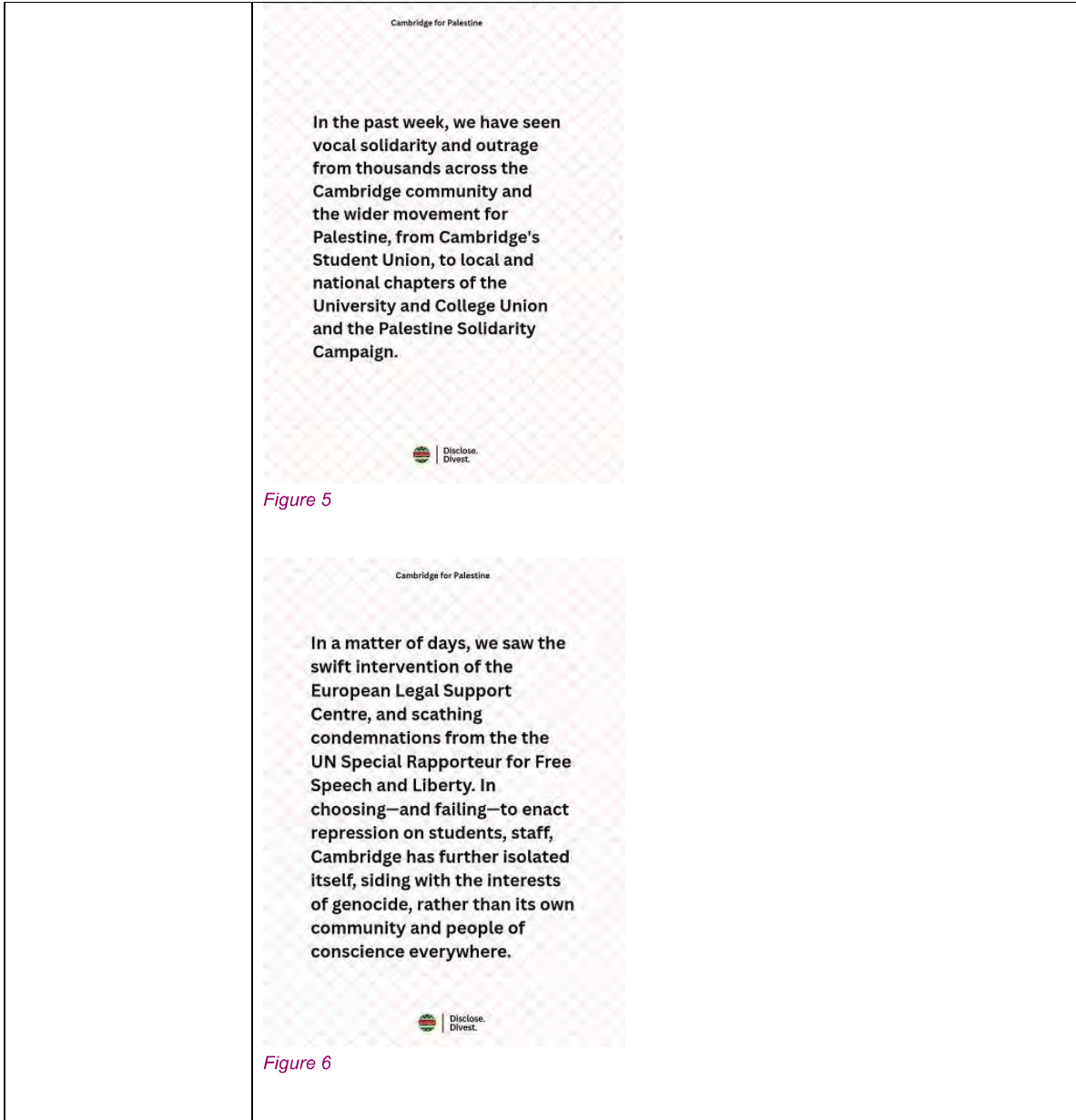


Figure 1



Figure 2





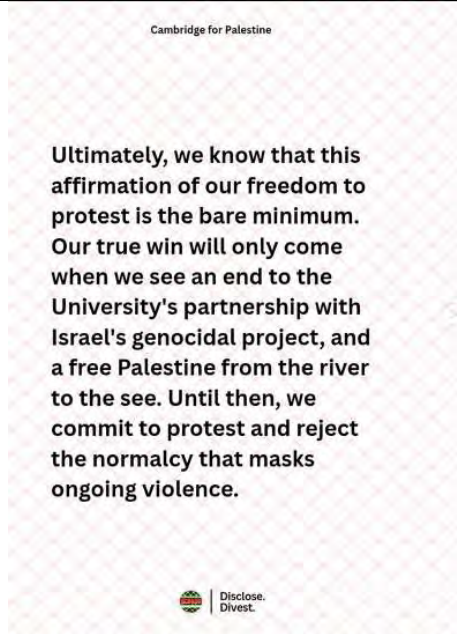
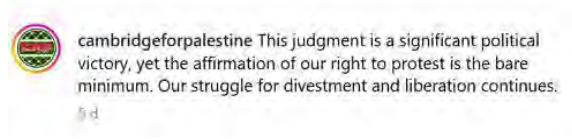





Figure 7



Figure 8



Caption

<p>3 days ago 2 March 2025</p>	 <p><i>VIDEO – SEE CAP VIDEO 1</i></p> <p> essad_48 and 4 others Original audio</p> <p> essad_48 Power to the students who held the many different colleges at Cambridge University accountable for its financial investments in Israel's occupation of Palestine.</p> <p>The institution's failed attempt to ban pro-Palestine activity on campus for five years will not intimidate the young academics from continuing to call for the human rights belonging to the Palestinian people.</p> <p><i>Caption</i></p>
------------------------------------	--

3 days ago
2 March 2025



1 - Video SEE C4P VIDEO 2



2 - Picture



3 - Video SEE C4P VIDEO 3



4 - Picture



5 - Video SEE C4P VIDEO 4



6 - Picture



7 - Video SEE C4P VIDEO 5



8 - Video SEE C4P VIDEO 6



9 - Picture

essad_48 and 5 others

essad_48 📍 Students attending Cambridge University will continue to call for the human rights of the Palestinians across occupied Palestine.

Earlier this week, Cambridge University attempted to ban students from engaging in Palestinian-related activities on campus for five years... They failed.

Such attempts expose how the institution feels threatened by the student movement in Cambridge. The student movement in Cambridge will continue to grow.

Shame on any institution that attempt to silence individuals from defending the rights of any oppressed people across the global south.

From Gaza to Jenin - Palestine will be free

Photos @wpho.tog
Video footage @essad_48

Edited 3 d

10 - Caption

2 days ago
3 March 2025



Picture



cambridgeforpalestine and 5 others
Great St Mary's, The University Church, Cambridge



cambridgeforpalestine Cambridge students graduate while honoring Palestine, standing in solidarity for justice and freedom. A powerful moment of resistance, unity, and unwavering support.

Cambridge University tried to silence us.

We will NEVER be silent while they profit From Genocide. Our call remains the same Disclose, Divest, We Will NOT Stop, We Will NOT REST.

#FreePalestine #EndApartheid #CambridgeForPalestine #GraduationForJustice"

2 d

Caption

1 day ago
4 March 2025



Stop arming Israel Defend the right to protest

Thursday 6 March

Lady Mitchell Hall, Sidgwick Site, 4pm

The University has applied for a High Court injunction which aims to criminalise protest for Palestine in the vicinity of Senate House and other University admin buildings. Come to this meeting to find out what we can do collectively to defend freedom of assembly and build the campaign for divestment from companies...

Picture



cambridgeforpalestine and 2 others



cambridgeforpalestine The University of Cambridge has been defeated in court on key elements of the injunction, which was targeting student protests against complicity in the israeli genocide of Palestinians. The uni has laid bare plans to silence its own students rather than cutting ties with genocide and ethnic cleansing.

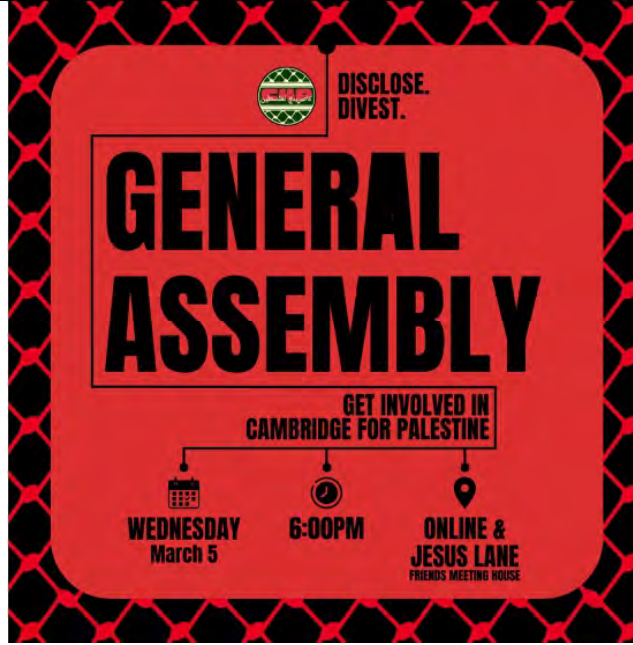
Come to the Divestment Assembly on 6 March to plan next steps in our campaign, needed now more than ever.

Join staff and students at 4pm, Thursday 6 March, Lady Mitchell Hall, Sidgwick site.

>> Read the press report here on the court case:
<https://www.independent.co.uk/news/uk/crime/university-of-cambridge-cambridge-university-palestine-israel-high-court-b2706220.html>

Caption

19 hrs ago
4 March 2025



Picture



cambridgeforpalestine *General Assembly tomorrow*

We will be hosting our weekly General Assembly tomorrow at 6pm at Friend's Meeting House and online. DM to receive the meeting link!

Join in to learn and contribute to our activities and strategic planning moving forward as the University tries to silence our movement. As always, new and old comrades welcome 🌟

19 h

Caption

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**Cambridge for Palestine - Instagram
posts - 5-7 March**

Source: [Cambridge for Palestine \(@cambridgeforpalestine\) • Instagram photos and videos](#)

Accessed: 7 March 2025

Post dates are approximate

MILLS & REEVE

Date: 1 day ago (6 March 2025). Seems to be a duplicate of an earlier post (see below).

Contains four pages:

ELSC **UCU** **LIBERTY** **ICJP** **PALESTINE SOLIDARITY CAMPAIGN**

HIGH COURT BLOCKS CAMBRIDGE'S ATTEMPT TO BAN PALESTINE PROTESTS

In a **major victory** for civil liberties and student activism, the **High Court** has **rejected** the University of Cambridge's attempt to impose a **five-year ban** on **Palestine-related protests** across its campuses. The University sought to prohibit all demonstrations on the issue **until 2030**, but the court **denied the sweeping injunction**.

822 likes
1 day ago

Add a comment...

Comments:

- europa.palestine.network and 2 others: Cambridge, United Kingdom
- europa.palestine.network: Huge win for the student movement! This is a critical pushback against the escalating repression of Palestine activism in the UK. The university's failed legal bid is part of a broader crackdown on students and staff demanding divestment from companies complicit in Israeli violations of international law. Since October 2023, universities across the UK have used disciplinary sanctions, legal threats and even police force to silence those speaking out for Palestine. Collective action is more urgent than ever. Students have always been at the forefront of movements for social change and we will continue to stand with them to protect this legacy. Source: @elcological
- the.corporate.feminist: Yes some activists
- mybookskw: Reply
- ron_the_person: Shame on Cambridge!
- allivia.gib: @ziva students. Full respect!
- intrichonails: Power to the people!
- ihavogreatpersonality: This is not by chance this is due to the hard work of activists who keep showing up in spite of the costs for themselves and their futures. Power to the people.
- sona.for.the.revolution: #Revolution #FreePalestine #casoffrontrow #savepedan #saveorange #israelis511 #palestinegenocide #israelterrorism #Cinemascope #Genocide #FreeDrHassanAbuSagha #NoMoreUnjustDeportations #StopICE #ImmigrantRights



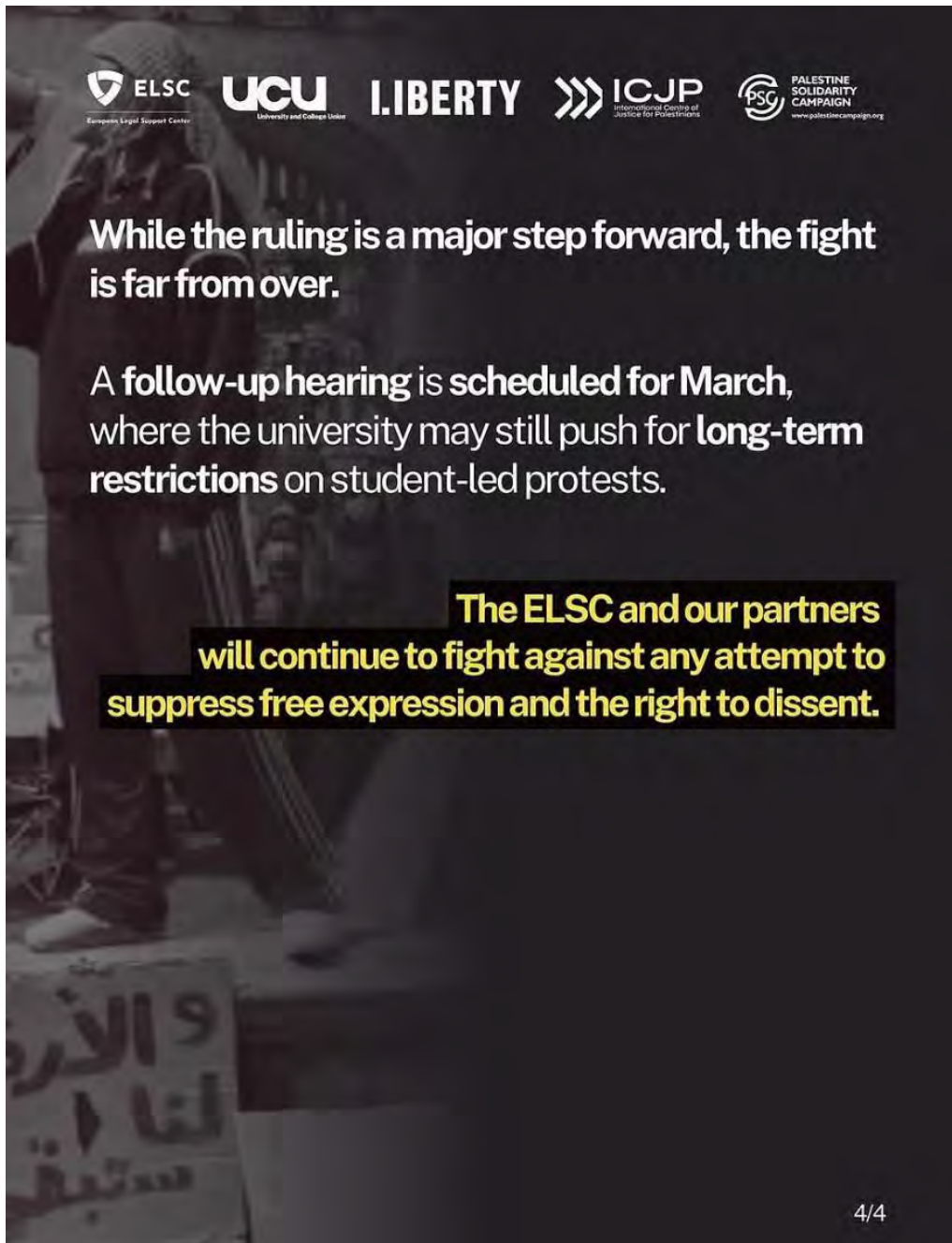
Instead, it granted a narrow, **two-day restriction** limiting access to **Senate House and Senate House Yard**, while **explicitly removing any references to Palestine** or the student group **Cambridge for Palestine (C4P)**.

This decision follows efforts by **student protesters and legal advocacy groups**, including the **European Legal Support Center (ELSC)**, to challenge the University's attempt to **suppress political expression**.



This is part of a **wider crackdown on student activism**. UK universities have increasingly been **targeting students protesting in solidarity with Palestine**. Institutions have:

- ⚠ **Used legal threats and civil injunctions** to shut down demonstrations.
- ⚠ **Called police onto campuses**, leading to arrests and violent removals of protesters.
- ⚠ **Disciplined and suspended students** for participating in protests.
- ⚠ **Monitored and censored student activism**, with some referred to the **Prevent programme** for expressing solidarity.



ELSC **UCU** **LIBERTY** **ICJP** **PALESTINE SOLIDARITY CAMPAIGN**
European Legal Support Center University and College Union International Centre of Justice for Palestinians www.palestinecampaign.org

While the ruling is a major step forward, the fight is far from over.

A follow-up hearing is scheduled for March, where the university may still push for long-term restrictions on student-led protests.

The ELSC and our partners will continue to fight against any attempt to suppress free expression and the right to dissent.

4/4



europe.palestine.network 🇸🇦 Huge win for the student movement! 🇸🇦

This is a critical pushback against the escalating repression of Palestine activism in the UK. The university's failed legal bid is part of a broader crackdown on students and staff demanding divestment from companies complicit in Israeli violations of international law.

Since October 2023, universities across the UK have used disciplinary sanctions, legal threats, and even police force to silence those speaking out for Palestine.

Collective action is more urgent than ever. Students have always been at the forefront of movements for social change, and we will continue to stand with them to protect this legacy.

Source: @elsclegal

1d

Date: 1 day ago (6 March 2025)

Contains four pages

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1/4

elslegal and 4 others

elslegal 🎉 Huge win for the student movement 🎉

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Collective action is more urgent than ever. Students have always been at the forefront of movements for social change, and we will continue to stand with them to protect this legacy.

📄 Read our full press release in the link in bio.

stephanialamba list 10 🙌🙌🙌🙌🙌🙌
1d · 1 like · Reply

ibuddai21 🙌🙌
2d · 1 like · Reply

libertyky 🙌🙌
1d · 1 like · Reply

imageresult 🙌🙌
1d · 1 like · Reply

sara_goldsmith_pascow Cer! find your press release if
1d · Reply

fatpatcord 🗨️🗨️🗨️
2d · 2 likes · Reply

daniel_james_camara Can somebody explain to me please why it's okay to protest almost anything but for Palestine ??
2d · 8 likes · Reply

— View replies (1)

sairatallooprofho2 @universityofcambridge
1d · 1 like · Reply

shintano 🍀🍀🍀
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Instead, it granted a narrow, **two-day restriction** limiting access to **Senate House and Senate House Yard**, while **explicitly removing any references to Palestine** or the student group **Cambridge for Palestine (C4P)**.




This decision follows efforts by **student protesters and legal advocacy groups**, including the **European Legal Support Center (ELSC)**, to challenge the University's attempt to **suppress political expression**.



This is part of a **wider crackdown on student activism**. UK universities have increasingly been **targeting students protesting in solidarity with Palestine**. Institutions have:

- ⚠ **Used legal threats and civil injunctions to shut down demonstrations.**
- ⚠ **Called police onto campuses, leading to arrests and violent removals of protesters.**
- ⚠ **Disciplined and suspended students for participating in protests.**
- ⚠ **Monitored and censored student activism, with some referred to the Prevent programme for expressing solidarity.**




 elslegal  Huge win for the student movement! 

This is a critical pushback against the escalating repression of Palestine activism in the UK. The university's failed legal bid is part of a broader crackdown on students and staff demanding divestment from companies complicit in Israeli violations of international law.

Since October 2023, universities across the UK have used disciplinary sanctions, legal threats, and even police force to silence those speaking out for Palestine.

Collective action is more urgent than ever. Students have always been at the forefront of movements for social change, and we will continue to stand with them to protect this legacy.

 Read our full press release in the link in bio.

1d

Cambridge for Palestine - Twitter posts -
28 Feb to 7 March 2025

Source: [Cambridge for Palestine \(@cam4palestine\) / X](#)

Accessed 7 March 2025

MILLS & REEVE

Cambridge for Palestine reposted



Priyamvada Gopal @PriyamvadaGopal · Feb 28

Good morning. A very good morning, in fact. Except for the BBC which has astoundingly, if unsurprisingly, spun this as a victory for Cambridge's management who have failed spectacularly.



From independent.co.uk

13

280

761

20K





Cambridge for Palestine @cam4palestine · 15h



Divest from Israeli arms or expect resistance. Full support to Palestine Action 🇲🇪



Palastine Action @PaL_action · Mar 4

BREAKING: Palestine Action students target Cambridge University's Endowment Fund offices, demanding the institution divests from companies enabling the slaughter of Palestinians.

The action comes days after the university failed to impose an ...

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171





Palestine Action ✓
@Pal_action



BREAKING: Palestine Action students target Cambridge University's Endowment Fund offices, demanding the institution divests from companies enabling the slaughter of Palestinians.

The action comes days after the university failed to impose an injunction banning protests.



12:06 PM · Mar 4, 2025 · 53.2K Views

57

862

2.1K

47







THE LAW SCHOOL AND UNIVERSITY OFFICES

Listed on the National Heritage List for England. Search over 400,000 listed places

(<https://historicengland.org.uk/listing/the-list/>)

Official list entry

Heritage Category:**Listed Building**

Grade:**I**

List Entry Number:**1126279**

Date first listed:**26-Apr-1950**

List Entry Name:**THE LAW SCHOOL AND UNIVERSITY OFFICES**

Statutory Address 1:**THE LAW SCHOOL AND UNIVERSITY OFFICES**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

Understanding list entries

(<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

Corrections and minor amendments

(<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

Location

Statutory Address:**THE LAW SCHOOL AND UNIVERSITY OFFICES**

The building or site itself may lie within the boundary of more than one authority.

County:**Cambridgeshire**

District:**Cambridge (District Authority)**

Parish:**Non Civil Parish**

National Grid Reference:**TL 44730 58432**

Details

THE OLD SCHOOLS 1. 942 The Law School and University Offices. TL 4458 SE 6/307 26.4.50. I 2. Cobble Court East Range 1754-8 by Stephen Wright. 2 storeys faced in Portland stone ashlar. 7 bays with the central five set forward. The ground floor is an open loggia with rusticated, round-head arches. The upper floor has a central Venetian window, the rest are square-headed. The interior has the original staircase with a scrolled wrought-iron balustrade. The main upper room (the East room) has a very good decoration, both carved wood and plaster-work. North Range late C14. Rubble with freestone dressings. The outer face of the building is now blocked by the Cockerell building. The interior has on the first floor the former Regent House, now a combination room. Of 6 bays, it has a enriched plaster ceiling of circa 1600 on a roof of circa 1400. It is otherwise much altered. West Range circa 1435-55. Largely altered in C18. The windows are mostly of that date, but 2 are C15. The interior

contains the Syndicate Room on the upper floor. South Range 2 storeys of 1457-circa 1470, the third added in 1864-7. Red brick with stone dressings on the North front, the South refaced in ashlar and buttressed in the C19. There are 7 C15 windows on the first floor, the others are C18 or modern. The interior has the Council Room on the first floor, this has a roof of 1466, a fine carved ceiling and 2 C18 doorways. North-West angle building 1718-19, 2 storeys; but with a modern 3rd storey added. The Dome Room on the first floor has panelling of 1719-20 and a flat plaster ceiling with some modelling. West Court. The Old Court of King's College brought by the University and partly demolished in 1829. Built from 1441-4, but never finished, the West range was completed and in part rebuilt to designs by G G Scott in 1864-7 and J L Pearson in 1890. The South range was completed by G G Scott in 1864-7. The Old Gatehouse has been extensively restored by Pearson and in modern times. It is of ashlar faced rubble. (RCHM).

Listing NGR: TL4473058432

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:**47306**

Legacy System:**LBS**

Sources

Other

Inventory of the Historical Monuments in the City of Cambridge, (1959)

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



Map

This map is for quick reference purposes only and may not be to scale. This copy shows the entry on 11-Mar-2025 at 09:17:02.

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Palestine Action - university social
media posts - 5 - 7 March

MILLS & REEVE

Source: [Palestine Action \(@Pal_action\) / X](#)

Accessed: 7 March 2025

6 March 2025:

 **Palestine Action** @Pa_action · 18h

In one week, Palestine Action targeted Oxford and Cambridge university over their direct links with the Israeli weapons industry.

Their buildings are worthless in comparison to the Palestinians right to life and liberation.





Profit from Palestinian bloodshed? Expect us.






16 315 697 8.4K

† Palestine Action reposted



6 March 2025


 **Palestine Action**  @PaL_action · 17h  

Don't like paint? Don't fund the genocide of Palestinians and the destruction of their homeland.

  Watch  Your Account







University condemns Palestine Action paint protest

23 hours ago  



Supplied

The protesters vowed to escalate direct actions, targeting the university's financial interests and reputation in their call for full divestment and accountability

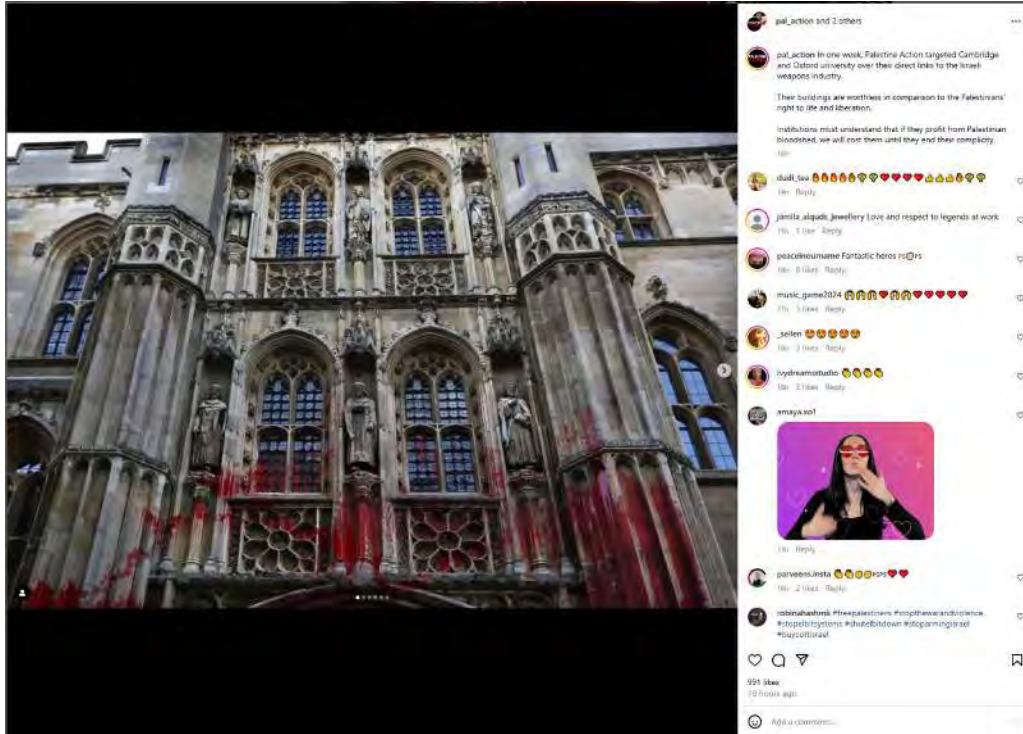
 24  319  967  9.4K  

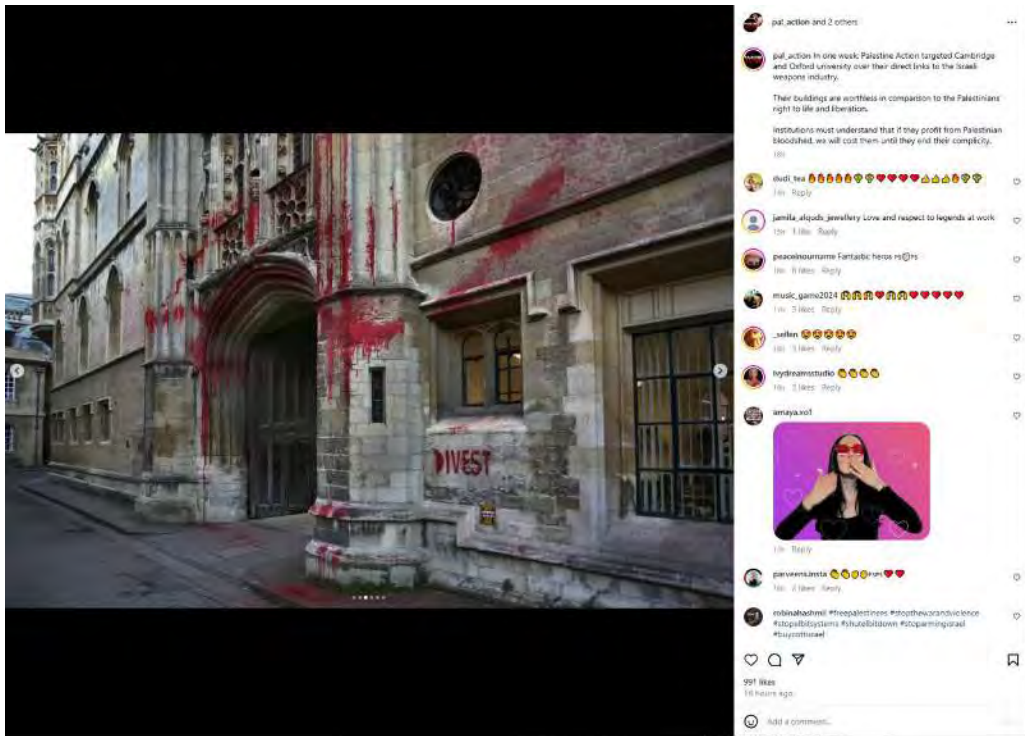
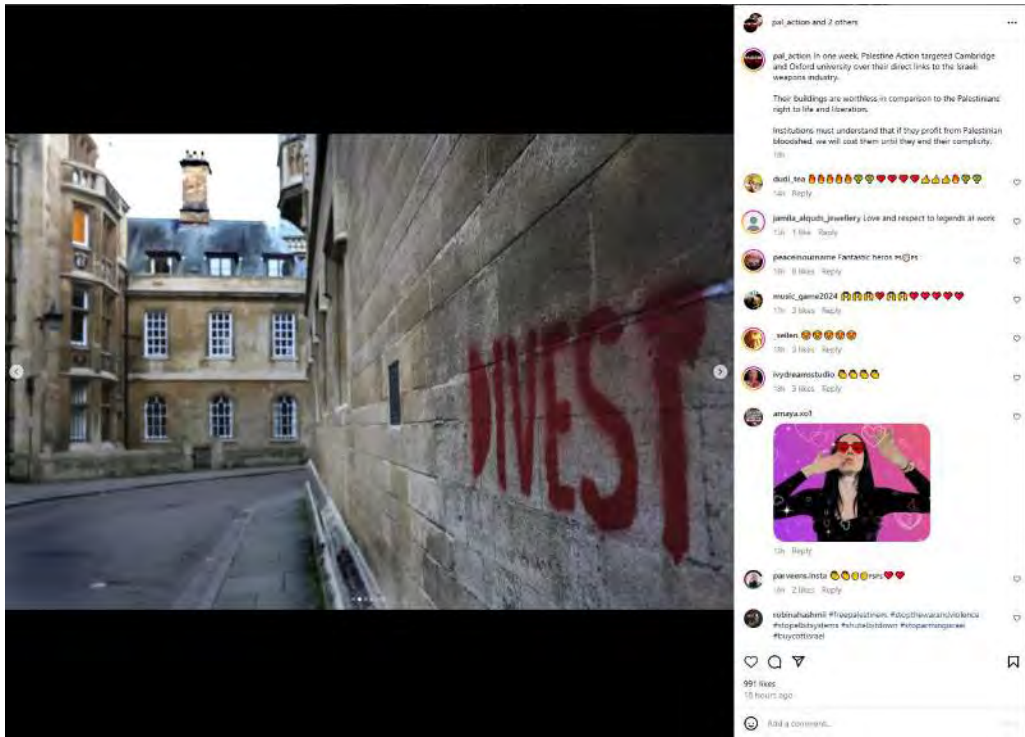
753588675_1

2

Source: [Palestine Action \(@pal_action\) • Instagram photos and videos](#)

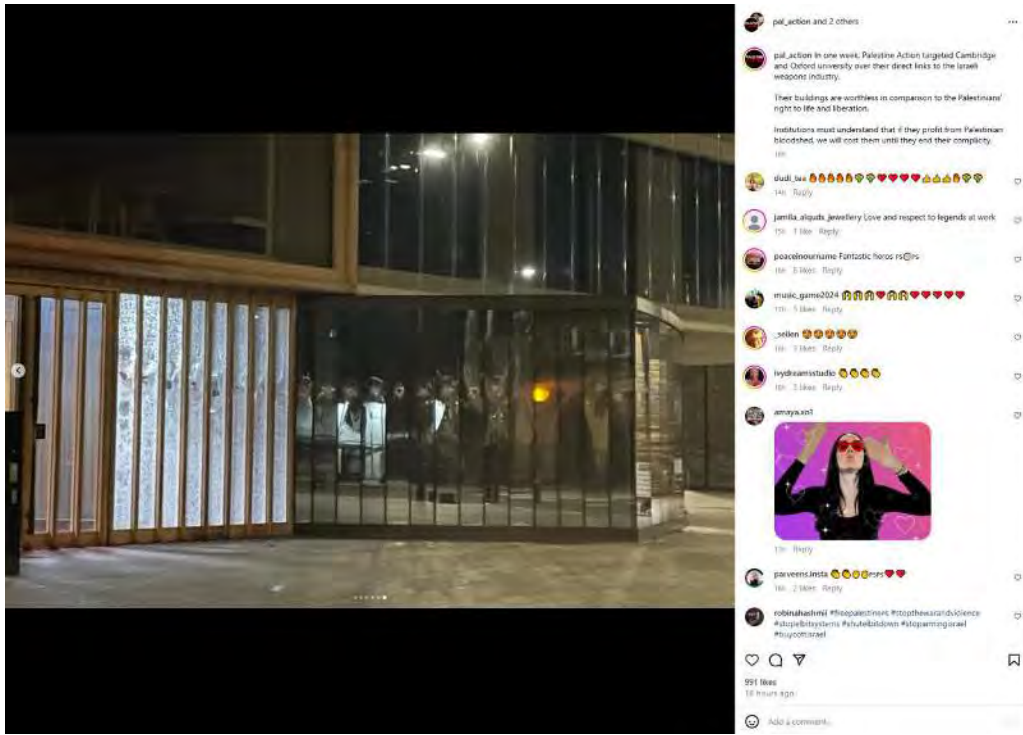
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4



pal_action In one week, Palestine Action targeted Cambridge and Oxford university over their direct links to the Israeli weapons industry.

Their buildings are worthless in comparison to the Palestinians' right to life and liberation.

Institutions must understand that if they profit from Palestinian bloodshed, we will cost them until they end their complicity.

18


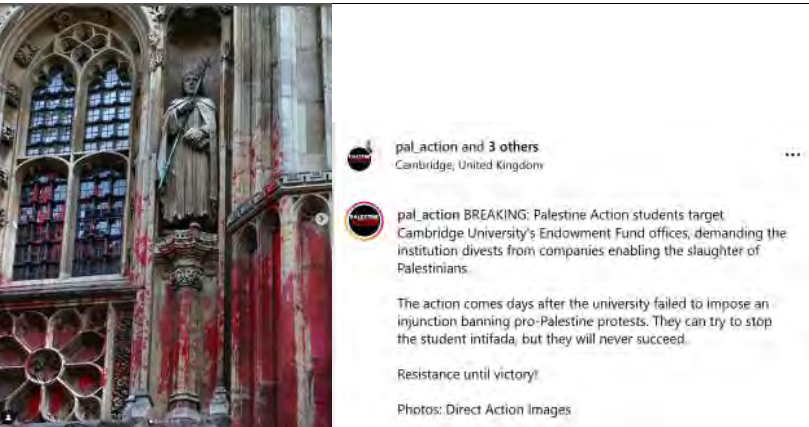
5 March 2025

Information

Palestine Action - Instagram Posts (Spray Paint)

Source: [Palestine Action \(@pal_action\) • Instagram photos and videos](#)

Accessed: 5 March 2025

<p>17 hours ago 4 March 2025</p>	 <p>THE JEWISH CHRONICLE</p> <p>Amid Russia danger, pro-Palestine activists are 'national security threat', warn former defence ministers</p> <p>The senior parliamentarians warned protests risk degrading Britain's reputation as a 'reliable supplier' to our allies</p> <p>March 4, 2025 12:22</p> <p>pal_action and 3 others</p> <p>pal_action There is a simple solution to your Palestine Action problem: shut down all Israeli weapons factories or we will do it for you.</p> <p>17 h</p>
<p>1 day ago 4 March 2025</p>	 <p>pal_action and 3 others Cambridge, United Kingdom</p> <p>pal_action BREAKING: Palestine Action students target Cambridge University's Endowment Fund offices, demanding the institution divests from companies enabling the slaughter of Palestinians.</p> <p>The action comes days after the university failed to impose an injunction banning pro-Palestine protests. They can try to stop the student intifada, but they will never succeed.</p> <p>Resistance until victory!</p> <p>Photos: Direct Action Images</p>

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News Cambridge News Cambridge University

Students cover Cambridge University building with red paint in pro-Palestine protest

The protest was against the university's links to Israeli organisations

By **Amy Britton** What's On Writer

15:07, 4 MAR 2025 | UPDATED: 08:21, 5 MAR 2025

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A group of students have covered the Old Schools building in red paint. (Image: Divest Action Images)

A group of students have covered a [Cambridge University](#) building in red paint to protest against the university's ties with Israeli organisations. The protest was carried out in collaboration with Palestine Action on Tuesday (March 4)

It involved covering the Old Schools building in red paint and slogans including 'divest'.

The group is calling for the university to take accountability for its actions and for a full divestment from organisations associated with the Israeli military. The university currently has research partnerships with Israeli institutes, the group said.

A spokesperson for the group said: "Each life lost in Palestine is a human being with dreams, loved ones, and a future stolen. As long as the university continues to profit from violence, we will continue to take action in solidarity with Palestinians who endure daily oppression and destruction.

"Now is the time to act. The university must understand that its profits from war crimes will never outweigh the damage done to its reputation and bottom line."

A Cambridge University spokesperson said: "We strongly condemn this vandalism of University property. The police have been informed."

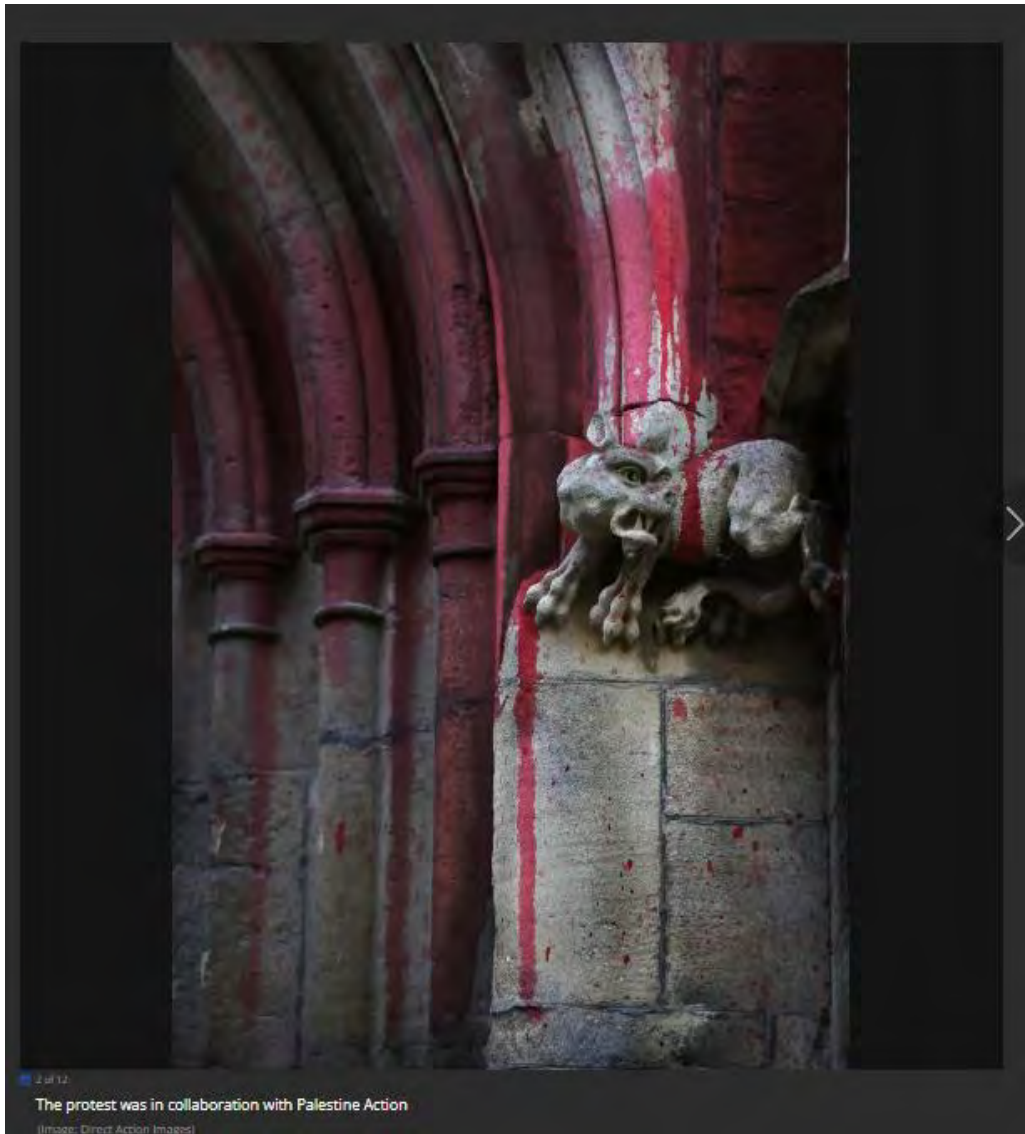
The group has also sprayed red paint on the Institute of Manufacturing in November 2024 and slashed a portrait of Lord Balfour in March 2024. The group "has vowed to escalate direct actions".

Cambridgeshire Police said a crime had been raised for criminal damage.

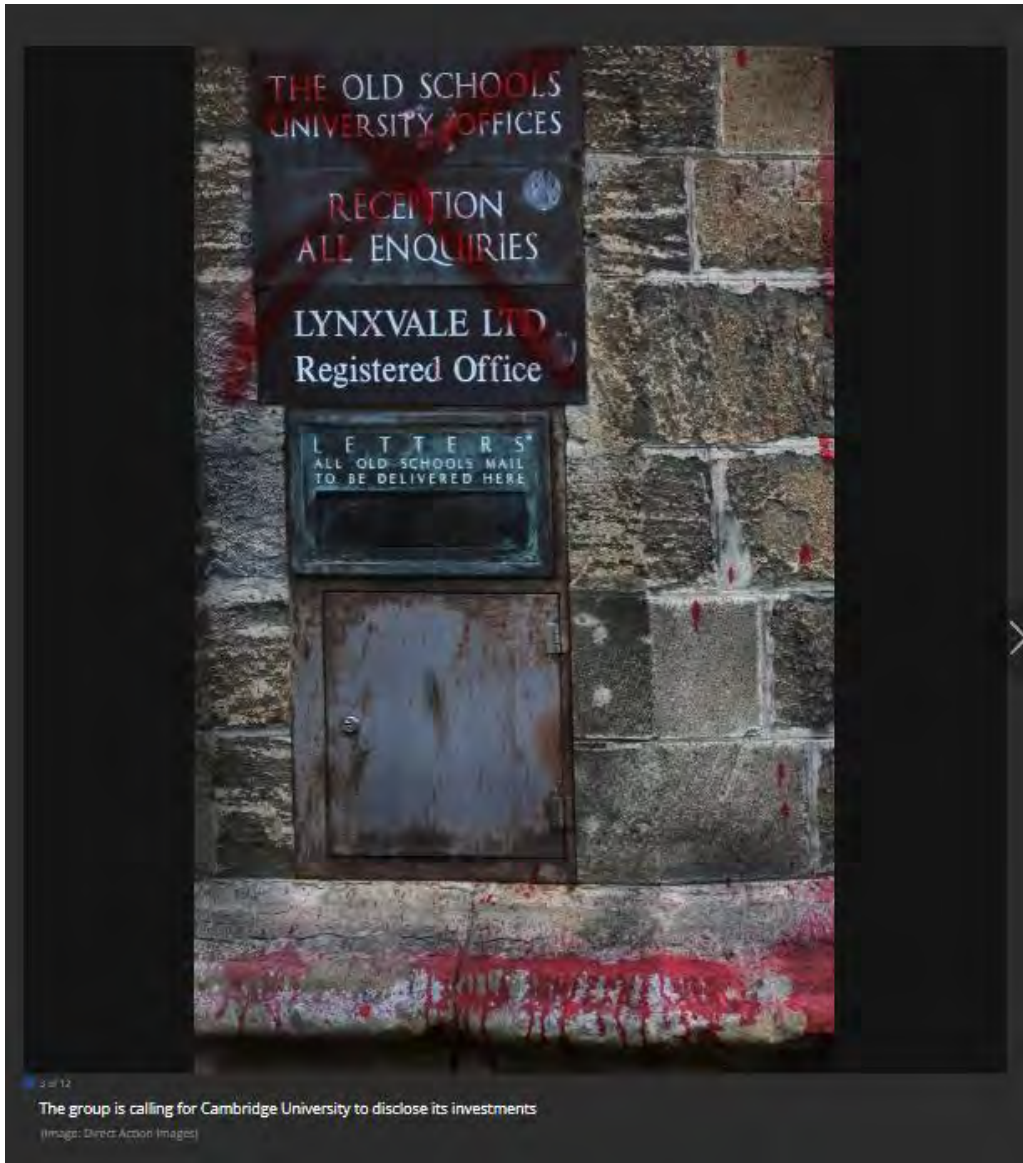
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The building holds the office that manages the University's Endowment Fund
(Image: Direct Action Images)



2 of 12
The protest was in collaboration with Palestine Action
(Image: Direct Action Images)



Pro-Palestine group targets Uni head offices with red paint

An emergency maintenance crew labelled the action 'criminal damage'

By Anuk Weerawardana

Tuesday March 4 2025, 4:54pm



The Old Schools Offices is Grade I listed, meaning it is of exceptional interest. AMINO REPLACES FOR VARSITY

Pro-Palestine protesters sprayed the University's head offices with red paint earlier today, criticising the University's investments in arms.

The action targeted the University of Cambridge's Old Schools Offices, which form the main administration for the University, including much of its financial activity.

Pro-Palestine activist group Palestine Action have claimed responsibility for the protest, stating that "As long as the University continues to profit from violence, we will continue to take action in solidarity with Palestinians who endure daily oppression and destruction".

The paint splattered was also accompanied with the slogans "always resist" and "free Palestine" on the walls of the Old Schools. The walls on either side of the gate have "divest" written in capital letters, with the sign displaying "The Old Schools University Offices" crossed out.

An emergency maintenance crew was positioned at the site and have already begun washing the paint off. One member of the crew told *Varsity* the clean-up would take at "at least two days". Another member dubbed the paint as "criminal damage".

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The Old Schools Offices is Grade I listed, meaning it is of exceptional interest, and deemed of great national and architectural importance.



In the past, it has been used for teaching rooms of the higher faculties, with the Divinity School being the first building to be established. Currently, it houses the central University offices and office of the vice-chancellor, Deborah Prentice.

This comes after the University was **granted** watered-down encampment restrictions after applying for an injunction to prohibit from entering, occupying or interfering with key University sites, including the Old Schools.

A high court judge granted the University a “very narrow and limited court order” last week (27/02), in order to prevent disruption to graduations on the weekend. But, the University’s proposed injunction of five years was rejected and restrictions beyond Saturday’s graduations were deemed not “necessary and justified”.

Following Saturday’s graduation ceremony more than 80 pro-Palestine protesters **gathered** for a rally held outside Senate House. One protester, speaking on Cambridge’s application for the injunction, commented: “Cambridge University attempted to undermine the students’ civil liberties. And then, they failed.”

“The University must understand that its profits from war crimes will never outweigh the damage done to its reputation and bottom line,” they added.



Last year (22/06), pro-Palestine protesters from Palestine Action also **sprayed** red paint over Senate House, the University’s central leadership building, after General admission graduations were scheduled to take place.

In November (02/11), members of the group **targeted** the University Institute for Manufacturing with red paint because of its ties with companies associated with arms manufacture, claiming that the Institute was a “centre of complicity”.



They also **targeted** the University of Oxford’s Blavatnik School of Government last week, smashing its windows and spraying it with red paint in a protest to end the University’s “complicity” in the war in Gaza.



Pro-Palestine group targets Cambridge University head offices

The action comes ahead of graduation ceremonies at Senate House next week

by Alice Mainwood

Saturday June 22 2024, 1:07pm



General admission graduations are scheduled to take place at Senate House next week. ALICE MAINWOOD FOR VARSITY

Cambridge University's central leadership building, Senate House, has been sprayed red in protest against the University's alleged ties to arms firms that supply the Israeli military.

This comes as General admission graduations are scheduled to take place at Senate House from Wednesday (26/06) to Saturday (29/06).

The action was announced this morning by Palestine Action and Youth Front for Palestine (YFFP) via Instagram. The post cites that the action was done by "Cambridge students, in collaboration with Palestine Action".

Senate House is a Grade 1 listed building which was opened in 1730. It has historically been used as the meeting place for the University Senate, but is now the site of all Cambridge graduation ceremonies.

Palestine Action and YFFP accused the University of investing in partnerships that are enabling "Palestinian genocide".

The post also stated that "ahead of planned graduations at the hall, the Senate House is now drenched in red, symbolising the ongoing complicity in Palestinian bloodshed".

The post also links to the song "Hind's Hall" by Macklemore, which was released in May in support of American student protesters calling for their universities to divest from Israel.

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One student at the scene, who is set to graduate next week, described the sight as "quite striking," saying that while they "assume they'll clean it all up before [graduation ceremonies]", it was making them feel "a bit worried about what might actually happen at graduation".

Another passer-by questioned whether the action was taken in relation to the conflict in Gaza, and expressed their hope that the action was taken by "students who actually have skin in the game".

Cambridge for Palestine (C4P), the activist group responsible for the encampment set up on King's Parade, was tagged in the Instagram statement but have not claimed a role in the action.

The protest comes after C4P set up a second encampment outside Senate House last month ahead of honorary Masters graduation ceremonies, in an attempt to pressure the University to meet their demands. The camp was soon dismantled after Cambridge agreed to meet with student representatives of C4P. The encampment outside King's College is still in place.

A University spokesperson told *Varsity*: "We strongly condemn this act of vandalism."

Palestine action commented that: "All universities in Gaza have been damaged, most of them are completely destroyed. The University of Cambridge is facilitating the ongoing destruction and genocide in Gaza, which is incomparable to paint on the Senate Hall."

"Many students have spent day and night for weeks on end demanding the university divest and Palestine Action supports their demands", they continued.

Youth Front for Palestine has been contacted for comment.



STUDENTS SPRAY CAMBRIDGE UNIVERSITY'S INSTITUTE FOR MANUFACTURING ON BALFOUR DAY

Nov 2, 2024



[Photos available of the action here](#)

Cambridge University students, in collaboration with the international group 'Palestine Action', have sprayed one of the university's centres of complicity: the institute for manufacturing

Today, the 2nd of November, marks 107 years since the Balfour declaration was signed. Cambridge educated Balfour and, until direct action destroyed it, his portrait was hung in Trinity College. Our university's complicity in the genocide of

the Palestinians runs deep; the criminology department at Cambridge University helps train 'israeli' police and military; the Department of Material Science partners with 'israeli' arms companies to produce armoured vehicles; Rolls-Royce operates out of the Institute for Manufacturing. We must challenge complicity wherever we see it, so today we showed the world the true colours of these institutes of death; blood on the institution's walls for blood on the institution's hands.

On their own website, Cambridge's Institute for Manufacturing lists Rolls-Royce, Siemens and BAE Systems among their research partners. They boast their ties with Rolls-Royce, the University Technology Centre this arms company has been allowed to set up on our University. The pride they take in perpetrating genocide, boasting about their links to manufacturer's of death, cannot continue. Shame on the IFM, shame on the Department of Material Science, shame on Cambridge University.

It's not just in Cambridge that these genocidal companies are allowed to exist. Across the country, Universities have longstanding technology partnerships with Rolls-Royce, a supplier of the F-35 fighter jets used in the murder of Palestinians. As their buildings continue to litter our campuses, as our Universities continue to invest in arms companies, we cannot sit idly by and allow these buildings to stand un-marked. We are calling on Birmingham, Bristol, Imperial College London, Loughborough, Manchester, Nottingham, Oxford, Sheffield, Southampton, Surrey and Swansea to smash, paint and occupy their Rolls-Royce buildings. Birmingham, your building is made of glass; Sheffield, your faculty of Engineering is covered in it too. We must challenge Rolls-Royce's stronghold in our University campuses and kick them off.

We have seen that direct action works. In the last few days, Barclay's has divested from Elbit and APCO will no longer lobby for Elbit. The power of the people made these things happen. They fear us when we are organised, and the genocidal war machine only responds to fear. Refuse to let arms companies stay on your campus - all Universities must be forced to cut ties with Rolls Royce.

And to Cambridge University: as you threaten to go back on your promises won by the encampment KNOW that this will continue to happen. You cannot stop the power of the people.

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join@palestineaction.org

Contact Support

legalsupport@palestineaction.org

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palactprisoners@protonmail.com

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Lord Balfour: Pro-Palestinian protesters damage University of Cambridge painting

8 March 2024



PALESTINE ACTION

Palastine Action says an activist 'ruined' Balfour painting in Trinity College, Cambridge

By Harriet Heywood & Brian Farmer

BBC News Cambridge

Police have launched an investigation after a painting of a politician, linked to the creation of Israel, was damaged.

Palestine Action said one of its activists had "ruined" a 1914 painting of Lord Balfour at Trinity College, part of the University of Cambridge.

A statement on the group's website said the painting had been "slashed" and sprayed with red paint.

Footage was also posted on social media.

A Cambridgeshire Police spokeswoman said: "This afternoon we received an online report of criminal damage today to a painting at Trinity College, Cambridge.

"Officers are attending the scene to secure evidence and progress the investigation. No arrests have been made at this stage."

Lord Balfour was foreign secretary in 1917 when a declaration was made pledging Britain's support for the establishment "in Palestine of a national home for the Jewish people" and has been seen by some historians as a **starting point for the Arab-Israeli conflict**.

A spokeswoman for Trinity College said: "Trinity College regrets the damage caused to a portrait of Arthur James Balfour during public opening hours. The police have been informed. Support is available for any member of the college community affected."

Palestine Action said, in a statement: "Palestine Action ruined a 1914 painting by Philip Alexius de László inside Trinity College, University of Cambridge of Lord Arthur James Balfour - the colonial administrator and signatory of the Balfour Declaration."

They added that "an activist slashed the homage and sprayed the artwork with red paint".

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Red paint hurled over University of Cambridge building in protest against links to companies arming Israel

The words 'we charge you with genocide' were sprayed on the ground

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By [Siobhan Middleton](#) 15:35, 13 MAR 2024

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Privacy **rown over Maxwell Centre** (Image: This Is Not A Drill.)



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Red paint was thrown over the doors of the Maxwell Centre on the [University of Cambridge's](#) West site on Tuesday (March 12) - with protesters claiming it was due to the centre's ties to companies supplying the Israeli military. The words 'we charge you with genocide' were sprayed on the ground outside the site.

According to This Is Not A Drill, which campaigns against the fossil fuel industry, the action is a result of the Laboratory for Scientific Computing's ties to companies supplying the Israeli military, including Boeing and BAE Systems. The Laboratory is housed in The Maxwell Centre.

This Is Not A Drill said: "The action calls for the wider university, which has accepted millions in research grants from arms companies in recent years, to end its complicity in genocide and colonial occupation. This action is one of hundreds across the country aiming to hold to account academic institutions for facilitating Israel's occupation of Palestinian land and its genocidal violence against Palestinian people.

Read more: [Women march against sexual violence with 'clothes are not consent' signs in Cambridge](#)

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Read more: [XR activist whose 'blood went cold' when he got a letter asking him to pay £28k, relieved after being found not guilty of damaging Cambridge's Schlumberger building](#)

Institute for Manufacturing hit by pro-Palestinian divestment activists

Several masked students entered the Department of Engineering, demanding the university end partnerships with 'companies complicit in Israel's bombing of Gaza'

by Eric Williams

This article is 1 year old
Friday November 10 2023, 11:58am



39 shares



The action comes after a [trifid demonstration](#) saw hundreds of pro-Palestinian demonstrators march in the heart of Cambridge last week. DANIEL HULTON

Pro-Palestinian student activists disrupted Cambridge's Institute for Manufacturing this morning, as part of ongoing pressure on the university to "sever financial ties" to Israel.

Several masked students entered the building, covering its floors with divestment material, and shouting through megaphones that they "cannot stand idle" as the Institute "basks in blood money" from partnerships with "companies complicit in Israel's bombing of Gaza".

The activists, corresponding with *Varsity* under the pseudonym 'FromRiverToSea', said they wanted the Institute for Manufacturing and the Cambridge Service Alliance to cut all "financial and research ties" with corporations "supporting apartheid and the ongoing genocide of Palestinians".

The phrase 'From the River to the Sea' has been the subject of controversy in the UK.

Home Secretary Suella Braverman has [instructed](#) the police and crime commissioners that it could amount to a racially aggravated section 5 public order offence, but student protestors have repeatedly chanted it at demonstrations staged in the heart of Cambridge over the last month.

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The Department of Engineering's Institute for Manufacturing (IfM) integrates University "research and education" with "practical application in industry", while its Cambridge Service Alliance (CSA) offers a "unique partnership" to some of the world's largest companies.

Both have been coming under scrutiny since over 1600 students and staff demanded that Cambridge "assess and sever financial ties with Israel" in a letter delivered to the vice-chancellor last month.

Pro-Palestinian student societies have named Israeli armoured vehicle manufacturer Plasan and more well known corporations like Boeing, BAE Systems, and Caterpillar as organisations that should be included in any potential university evaluation.



According to the masked protesters, companies to be targeted should include those involved in "manufacturing, maintaining, or trading any system components used to kill people in Gaza".

Industrial partners in the Cambridge Service Alliance have included Caterpillar and BAE systems, the latter of which was a founding member, and both corporations feature in the CSA's current promotional material.

However, the University told Varsity that the CSA has not worked with either company for several years, while declining to comment on claims made about the Institute for Manufacturing.

This morning's activism is the latest example of mounting pro-Palestinian pressure on campus, after the Palestine Solidarity Society (PaSoc) called the university's refusal to "seriously engage" with divestment demands evidence of "institutional complicity in genocide". ●

STAY IN CONTROL

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The boycott@varsity.org team. Contributes to: Anti-Racism, LGBTQ+ and Gender Equality Funds. Don't panic! We're in this together. game contributions vary, non-student contributions must be over £10 and open only within 24 hours and are valid for 28 days. See full terms.

The
OXFORD STUDENT

Oxford University's Student Newspaper. Est. 1991



Credit: Kate Bansmer

[University News](#)

·1st March 2025

Palestine Action claims responsibility for breaking Blavatnik School windows, spraying paint

Devika Manish Kumar

UK-based pro-Palestinian direct action group Palestine Action has claimed responsibility for the incident which took place at the Blavatnik School of Government Thursday night.

The front entrance of the Blavatnik School was closed on Friday after several window panes on the ground floor were broken and sprayed with red paint. Palestine Action similarly targeted the University's [Wellington Square building](#) last year. Thames Valley Police are investigating this incident as criminal damage.



Broken windows at the front entrance of the Blavatnik School of Government. Credit: Kate Bansmer



Red paint at the front entrance of the Blavatnik School of Government. Credit: Kate Bansmer

An Instagram [post](#) published by Palestine Action on Friday afternoon stated they targeted the Blavatnik School due to the University of Oxford's investments in Elbit Systems, Israel's largest

domestic private arms manufacturer, in addition to former British Prime Minister Rishi Sunak’s “new position on Blavatnik’s board”. Sunak’s tenure as prime minister was between September 2022 and July 2024 and he oversaw the UK’s initial response to Israel’s invasion of the Gaza Strip in October 2023.

It is unclear which board the group is referring to; the Blavatnik School [announced](#) in January that Sunak would join the School’s ‘World Leaders’ Circle’, a network of former heads of government. Palestine Action added the University of Oxford and the Blavatnik School’s associations with Elbit Systems and Sunak are “ties to genocide”. The post addressed the “Board of Governors”: “End your complicity or expect direct action.”

Another Instagram [post](#) published on Friday afternoon by Oxford Action for Palestine (OA4P), a pro-Palestine student group at the University of Oxford, and re-shared by Palestine Action stated: “While this action is not affiliated with OA4P, we acknowledge our shared goals in highlighting the complicity of the University of Oxford in Israeli occupation, apartheid, and genocide. We, alongside members of the broader Oxford community, will not rest while the University remains complicit, exemplified by the ongoing work of Palestine Action and OA4P.”

Palestine Action describes itself as a “direct action movement committed to ending global participation in Israel’s genocidal and apartheid regime” by targeting “corporate enablers of the Israeli military-industrial complex” through “disruptive tactics”. The group has used red paint symbolically in several of its targeted actions, including at an [arms manufacturing factory](#) in Newcastle in February and the [BBC’s headquarters](#) in London last year.



Broken windows at the front entrance of the Blavatnik School of Government. Credit: Kate Bansmer

It is particularly critical of Elbit Systems, which signed a USD 275 million [deal](#) with Israel’s Ministry of Defense in January to supply and domestically produce bombs and munitions.

A University of Oxford spokesperson told *The Oxford Student* the School remained open as normal for teaching and research on Friday, with students and staff redirected to the rear entrance. The spokesperson added: "The University is working with the Police to identify those responsible."

Prior to the post by Palestine Action, the Thames Valley Police told *The Oxford Student*: "We have received reports of criminal damage at a building in Walton Street, Oxford which is believed to have happened in the early hours of this morning (28/2). No arrests have been made at this time. An investigation is ongoing and we would ask anyone with information, CCTV or other footage to contact Thames Valley Police on 101 quoting reference 43250099003."

The Oxford Student has reached out to the University of Oxford, the Blavatnik School of Government, and Thames Valley Police for updated comments following the post by Palestine Action.



Press Release

High Court rejects bid by the University of Cambridge for a long-term injunction on Palestine protests

Published on Mon Mar 03 2025

Joint Press Release

High Court rejects bid by the University of Cambridge for a long-term injunction on Palestine protests

On 27 February 2025, the High Court of Justice refused to make an injunction sought by the University of Cambridge on 12 February, which aimed to ban all Palestine-related protests at four university sites until 2030. A coalition of groups,

including the European Legal Support Center, University and College Union, Palestine Solidarity Campaign, the International Centre of Justice for Palestinians, and Liberty declared the ruling a victory for student activists, affirming their right to protest and pushing back against the University's attempts to suppress political expression on campus.

The University's application came in response to a series of high-profile encampments and demonstrations led by Cambridge for Palestine (C4P) at Senate House Yard in May and November 2024. These actions were part of a broader movement demanding that Cambridge divest from companies and institutions linked to Israel's crimes against Palestinians, particularly its violations in Gaza, which the International Court of Justice has ruled may plausibly amount to genocide—a conclusion reinforced by a large body of international law experts.

The protests saw students engaging in peaceful direct action after what they described as months of broken commitments and failed negotiations with university administrators. Despite the university's legal efforts to impose a sweeping five-year protest ban, the court issued a narrow, two-day injunction that restricted entry to Senate House and Senate House Yard. However, it explicitly removed any references to Palestine or C4P, while preserving the right to protest in surrounding areas.

We welcome the court's decision to reject the University's attempt to criminalise protest, but this fight is far from over. The Judge has scheduled a follow-up hearing for March 2025 to decide whether a longer-term injunction will be imposed. We will continue to challenge this blatant attack on students' fundamental rights and oppose any attempt to suppress political expression on campus.

Since October 2023, university managements across the UK have escalated a pattern of aggressive tactics aimed at suppressing student-led protests. Disciplinary measures have been weaponised against individual students, while universities have pursued costly legal action to remove protest organisers and dismantle encampments. In many cases, police have been called to forcibly remove demonstrators, leading to arrests and, in some instances, injuries. Reports have also emerged of security staff harassing and even physically assaulting student protesters.¹

Beyond direct crackdowns on demonstrations, universities have sought to stifle, censor, and monitor lawful political expression and peaceful activism. Events have been cancelled, excessive bureaucratic barriers imposed on organisers, and students and staff subjected to investigations for their participation in protests. In some cases, individuals have even been referred to the Prevent Programme and accused of supporting terrorism simply for their social media activity or other lawful expressions of solidarity. These actions represent a growing and dangerous trend, posing a direct threat to the student movement in Britain. The right to protest and freedom of speech on university campuses are being eroded, with consequences that extend far beyond higher education and into wider civil society.

Anna Ost, lawyer from the ELSC, stated: *"This is a significant victory—one that sends a strong message to other universities attempting to impose such draconian restrictions on freedom of assembly and protest. The University of Cambridge's efforts to undermine its students' civil liberties—by seeking an injunction to effectively ban expressions of Palestine solidarity both on and off campus until 2030—represented the broadest restriction on university protests to date. Since October 2023, we have witnessed ongoing attempts to undermine students' right to protest and to challenge their institutions' complicity in violations of international law and genocide. It is our responsibility to fight this wider pattern of repression against our movement, on university campuses or otherwise, and against our civil liberties in the legal terrain."*

Ruth Ehrlich, Head of Policy and Campaigns at Liberty, said: *"In an increasingly hostile space for protest rights, civil injunctions are being used by universities around the country to limit the way anyone can make their voices heard on campus. Students have long been at the forefront of movements for social change. Liberty will continue to defend their right to protest."*

A UCU spokesperson stated: *"The failure of Cambridge's bid at the High Court to repress pro-Palestine protests for five years is an important victory for our democratic rights. Universities should be promoting our basic freedoms, not attempting to crush them. We now urge Cambridge's Vice Chancellor to drop these cack-handed attempts at criminalising peaceful protest altogether."*

Ben Jamal, Palestine Solidarity Campaign, Director, said: *"This is an important victory for freedom of expression and freedom of assembly, both of which should*

be cornerstones of university life. The University of Cambridge tried to single out Palestinian staff and students and those speaking up for international law, and subject them to draconian restrictions not applied to protestors on any other issue. This decision should mark a watershed in defence of freedom of expression and the right to protest.”

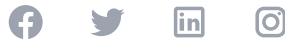
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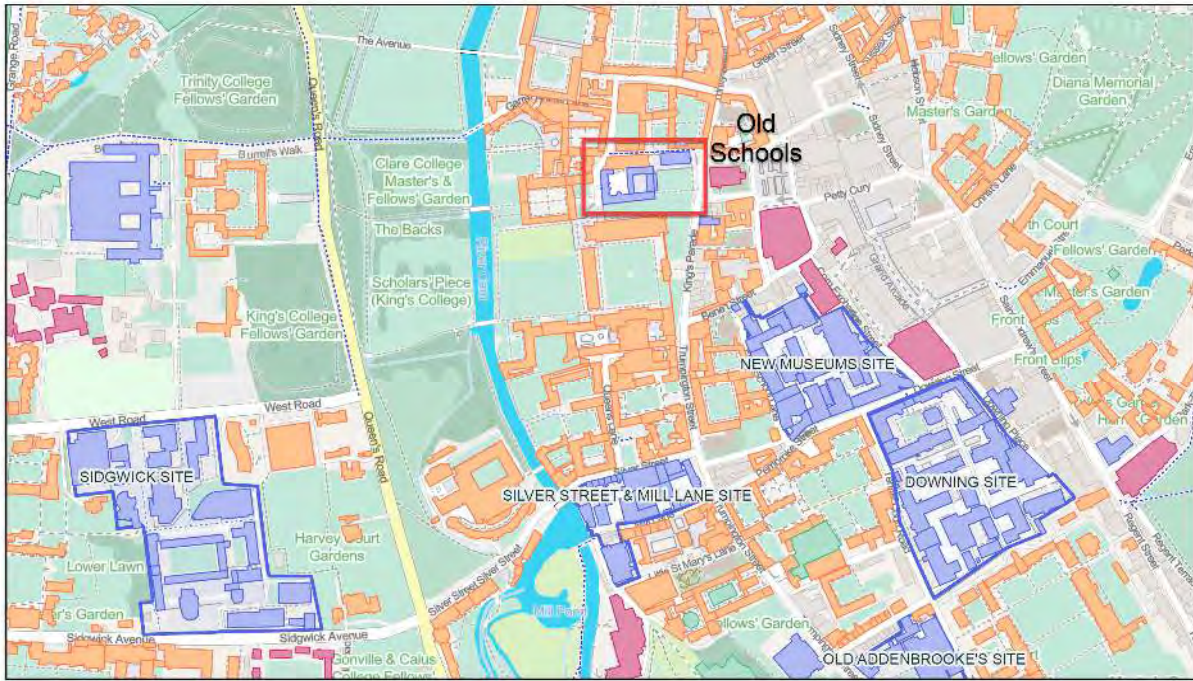
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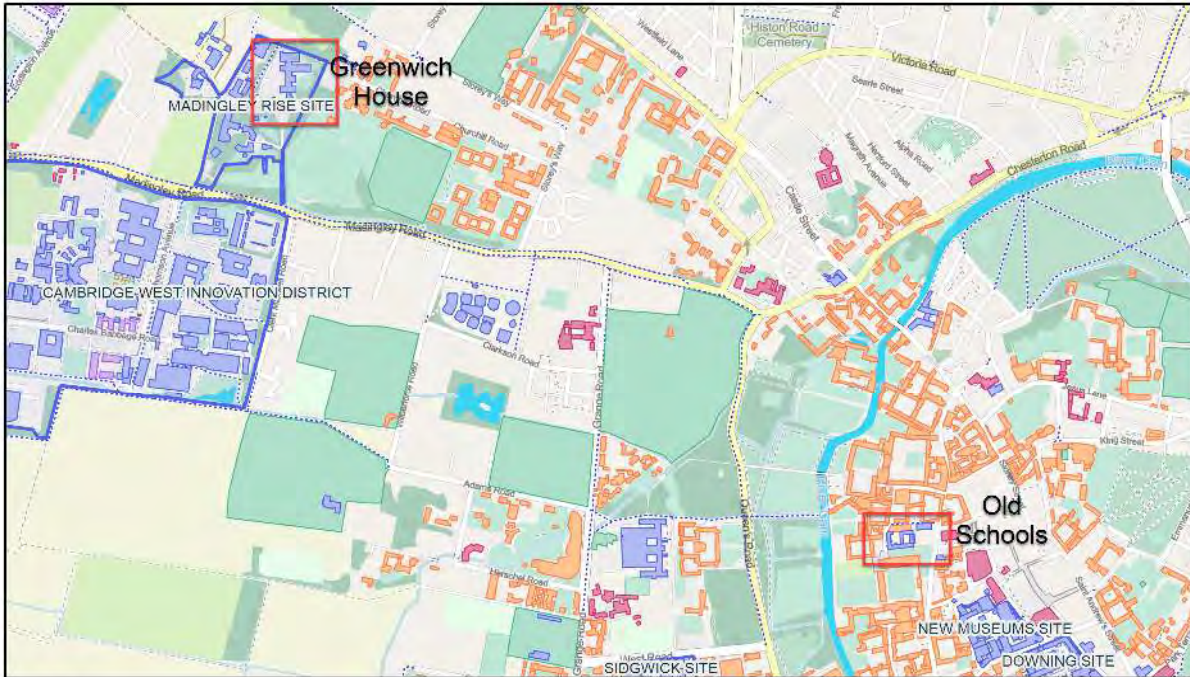
March 2025

Buildings

- University building
- College building

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Greenwich House



March 2025

Buildings

- University building
- College building

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Calendar

31 July, *Wednesday*. Last ordinary issue of the *Reporter* in the 2023–24 academic year.25 September, *Wednesday*. First ordinary issue of the *Reporter* in the 2024–25 academic year.1 October, *Tuesday*. Michaelmas Term begins. Congregation of the Regent House at 9.55 a.m.: Election and admission of the Proctors. Annual address by the Vice-Chancellor.8 October, *Tuesday*. Full Term begins. Discussion by videoconference at 2 p.m. (see below).

Discussion on Tuesday, 8 October 2024

The Vice-Chancellor invites members of the Regent House, University and College employees, registered students and others qualified under the regulations for Discussions (*Statutes and Ordinances*, p. 111) to attend a Discussion **by videoconference** on Tuesday, 8 October 2024 at 2 p.m. The following item will be discussed:

1. Joint Report of the Council and the General Board, dated 18 July 2024, on the review of examination regulations following the marking and assessment boycott (p. 806).

Those wishing to join the Discussion by videoconference should email UniversityDraftsman@admin.cam.ac.uk from their University email account, providing their CRSid (if a member of the collegiate University), by 10 a.m. on the date of the Discussion to receive joining instructions. Alternatively contributors may email their remarks to contact@proctors.cam.ac.uk, copying ReporterEditor@admin.cam.ac.uk, by no later than 10 a.m. on the day of the Discussion for reading out by the Proctors,¹ or may ask someone else who is attending to read the remarks on their behalf.In accordance with the regulations for Discussions, the Chair of the Board of Scrutiny or any ten members of the Regent House² may request that the Council arrange for one or more of the items listed for discussion to be discussed in person (usually in the Senate-House). Requests should be made to the Registrar, on paper or by email to UniversityDraftsman@admin.cam.ac.uk from addresses within the cam.ac.uk domain, by no later than 9 a.m. on the day of the Discussion. Any changes to the Discussion schedule will be confirmed in the *Reporter* at the earliest opportunity.General information on Discussions is provided on the University Governance site at <https://www.governance.cam.ac.uk/governance/decision-making/discussions/>.

Footnotes

- 1 Any comments sent by email should please begin with the name and title of the contributor as they wish it to be read out and include at the start a note of any College and/or Departmental affiliations held.
- 2 <https://www.scrutiny.cam.ac.uk/> and https://www.admin.cam.ac.uk/reporter/regent_house_roll/.

Notice of a benefaction

18 July 2024

The Vice-Chancellor gives notice that she has accepted with gratitude a benefaction of approximately £4.7m from the trustees of a discretionary trust fund established under the will of Dr John Brian Dodsworth. In a letter of wishes dated 18 September 2018, Dr Dodsworth requested that the trust fund be used to 'support the study, teaching of and research in Icelandic studies in the University; and support the purchase of material relevant to Icelandic studies by the University Library'. The Council is submitting a Grace (*Grace 2*, p. 812) to establish an endowment fund reflecting that wish, to be called the Brian Dodsworth Fund.

Grace 2 of 17 July 2024: Correction

22 July 2024

The Vice-Chancellor gives notice of a correction to *Grace 2 of 17 July 2024*, made under Regulation 15 of the Ordinance for Graces and Congregations (*Statutes and Ordinances*, p. 112). The wording of the Grace has been amended to read as follows (inserted wording shown in bold [and underlined in the online version]):

2. That the recommendations in paragraph 5 of the Report of the Council, dated 4 June 2024, on the term of office of the Chancellor and the High Steward (*Reporter*, 6744, 2023–24, p. 634), **as amended by the Council's Notice dated 11 July 2024**, be approved.¹

¹ See the Council's Notice, p. 778.

Election to the Board of Scrutiny in class (c)(ii)

23 July 2024

The Vice-Chancellor announces that the following person has been elected to serve as a member of the Board of Scrutiny in class (c)(ii) with immediate effect until 30 September 2027:

Class (c)(ii) (a member of the Regent House): **Professor NEIL WYN EVANS**

The results of the voting are as follows:

Number of valid votes cast: 1,984 (no invalid votes) (Quota: 992)

Professor NEIL WYN EVANS	1,345	ELECTED
Ms MARÍA MATILDE GOODALL	639	
TOTAL	1,984	

Dates of Congregations, 2024–25, 2025–26 and 2026–27

The Vice-Chancellor gives notice, in accordance with [Special Ordinance A \(ii\) 2](#), and the regulations for General Admission to Degrees, that Congregations will be held on the following days in the academic years 2024–25, 2025–26 and 2026–27.

CONGREGATIONS OF THE REGENT HOUSE (on Saturdays unless otherwise stated)

2024–25

MICHAELMAS TERM 2024 <i>Full Term:</i> 8 October – 6 December	LENT TERM 2025 <i>Full Term:</i> 21 January – 21 March	EASTER TERM AND LONG VACATION 2025 <i>Full Term:</i> 29 April – 20 June
1 October (Tuesday), 9.55 a.m. ¹ 25 October (Friday), 10 a.m. 26 October, 10 a.m. 30 November, 10 a.m.	31 January (Friday), 2 p.m. <i>(for degrees in absence only)</i> 1 March, 10 a.m. 29 March, 10 a.m. 5 April, 10 a.m.	3 May, 10 a.m. 23 May, (Friday) 10 a.m. 24 May, 10 a.m. <i>Honorary Degrees:</i> 25 June (Wednesday), 2.45 p.m. <i>General Admission:</i> 2 July (Wednesday), 10 a.m. ² 3 July (Thursday), 10 a.m. ² 4 July (Friday), 10 a.m. ² 5 July, 10 a.m. ² 24 July (Thursday), 10 a.m. 25 July (Friday), 10 a.m. 26 July, 10 a.m.

2025–26

MICHAELMAS TERM 2025 <i>Full Term:</i> 7 October – 5 December	LENT TERM 2026 <i>Full Term:</i> 20 January – 20 March	EASTER TERM AND LONG VACATION 2026 <i>Full Term:</i> 28 April – 19 June
1 October (Wednesday), 9.55 a.m. ¹ 24 October (Friday), 10 a.m. 25 October, 10 a.m. 29 November, 10 a.m.	30 January (Friday), 2 p.m. <i>(for degrees in absence only)</i> 28 February, 10 a.m. 28 March, 10 a.m. 11 April, 10 a.m.	2 May, 10 a.m. 22 May, (Friday) 10 a.m. 23 May, 10 a.m. <i>Honorary Degrees:</i> 24 June (Wednesday), 2.45 p.m. TBC. <i>General Admission:</i> 1 July (Wednesday), 10 a.m. ² 2 July (Thursday), 10 a.m. ² 3 July (Friday), 10 a.m. ² 4 July, 10 a.m. ² 23 July (Thursday), 10 a.m. 24 July (Friday), 10 a.m. 25 July, 10 a.m.

2026–27

MICHAELMAS TERM 2026 <i>Full Term:</i> 6 October – 4 December	LENT TERM 2027 <i>Full Term:</i> 19 January – 19 March	EASTER TERM AND LONG VACATION 2027 <i>Full Term:</i> 27 April – 18 June
1 October (Thursday), 9.55 a.m. ¹ 23 October (Friday), 10 a.m. 24 October, 10 a.m. 28 November, 10 a.m.	29 January (Friday), 2 p.m. <i>(for degrees in absence only)</i> 27 February, 10 a.m. 3 April, 10 a.m. 10 April, 10 a.m.	1 May, 10 a.m. 21 May, (Friday) 10 a.m. 22 May, 10 a.m. <i>Honorary Degrees:</i> 23 June (Wednesday), 2.45 p.m. TBC. <i>General Admission:</i> 30 June (Wednesday), 10 a.m. ² 1 July (Thursday), 10 a.m. ² 2 July (Friday), 10 a.m. ² 3 July, 10 a.m. ² 22 July (Thursday), 10 a.m. 23 July (Friday), 10 a.m. 24 July, 10 a.m.

Footnotes

¹ Election and admission of the Proctors.

² General Admission (M.Eng., M.Math., M.Sci., Vet.M.B., B.A., and B.Th. Degrees only).

Report of the General Board on the introduction of Clinical Academic (Teaching and Scholarship) offices and posts:

Notice in response to Discussion remarks*

18 July 2024

The Council has received the remarks made at the Discussion on 25 June 2024 concerning the above Report (*Reporter*, 2023–24: 6745, p. 683; 6748, p. 776).

The General Board's Report is the first step in enabling teaching-focused clinical academics to seek promotion under the Academic Career Pathway (Teaching and Scholarship) (ACP (T&S)) scheme. It recommends permitting promotion of clinical academics to existing offices and posts on the T&S track, and also to the office of Clinical Professor, which is currently only available on the Research and Teaching track. This will create a clear promotions pathway through different levels of office and post for teaching-focused clinical academic staff. If the Report's recommendations are approved, the ACP (T&S) **scheme guidance**¹ will be updated to cover clinical academic (T&S) roles. The changes to the existing scheme guidance are expected to be minimal, with the single most substantive change being an additional requirement that clinical academics must be clinically active. Those seeking promotion as clinical academics will therefore need to meet the existing criteria and also hold an honorary consultant contract from an NHS body.²

Dr Aslle draws attention to discussion of the office of Clinical Professor, including the contents of the 2022 Report that proposed the new office. He quotes from the Report, which noted that for clinical academics, whose pay is determined according to NHS seniority, 'the purpose of applying for promotion under the University's academic promotions scheme is solely to achieve a change in title, with their pay remaining the same'.³ This remains the main reason for including only one office of Clinical Professor in the table in paragraph 14 of this Report, equivalent to the office of Professor at Grade 12 for non-clinical academics, rather than having two offices, one at Grade 11 and another at Grade 12.

The General Board has confirmed that the criteria for promotion to a Clinical Professorship through the ACP (T&S) Pathway are to be equivalent to those for promotion to the office of Professor at Grade 12 rather than the office of Professor (Grade 11). Although the Report notes transitional arrangements for clinical academics who currently hold the offices of Reader and Professor (Grade 11), there are in fact no current holders of those offices in either the School of Clinical Medicine or the School of the Biological Sciences and therefore no transfers are anticipated.

Professor Evans is correct that the honorary consultant contract does not of itself guarantee expertise in teaching and therefore the relevant assessment of teaching ability would be on appointment and as part of the promotions process. However, as noted above, it is a core criterion for clinical academics that they must hold an honorary consultant contract, therefore any person seeking to transfer or be appointed or promoted to any clinical academic role, including T&S roles, must hold such a contract. This is because holding an honorary consultant contract indemnifies those academics when they carry out clinical work associated with their contract of employment with the University. It also confirms their status as individuals who can carry out clinical work in an NHS setting, are registered with a relevant professional body (such as the General Medical Council) and are on the Specialist register. Administratively, it also confirms that they are eligible to be paid on the clinical pay scales, given that all clinical academics are paid according to those pay scales.

The Council is submitting a Grace (**Grace 1, p. 812**) for the approval of the recommendations of this Report.

Footnotes

- 1 See the existing guidance on the HR Division's website at: <https://www.acptands.hr.admin.cam.ac.uk/>.
- 2 An honorary consultant contract signifies that the holder is registered with the General Medical Council, the Nursing and Midwifery Council or the Health and Care Professions Council.
- 3 *Reporter*, 6646, 2021–22, p. 256.

Correction

- * 25 October 2024: This Notice has been amended to remove wording that suggested that the General Board had been consulted in preparing the Notice.

Making decisions during crises

18 July 2024

In July 2020, at the end of the first lockdown of the Covid-19 pandemic, the Council acknowledged that it needed to provide greater clarity on how it expected the University to make decisions in a future crisis. It invited members of the Regent House to provide their feedback on the management of the pandemic since March 2020 by calling a Discussion on a Topic of concern. In its response to remarks made at that Discussion, the Council noted that it would devise a scheme to govern strategic decision-making in a crisis 'to bridge the gap between the highlighted concerns about transparency of decision-making and accountability to the Regent House and the Council's need for a more agile decision-making process that is capable of providing an authoritative response within a short timeframe'.¹

In its response to the Board of Scrutiny's 28th Report in January 2024, the Council noted its regret for the delay in providing its proposals on the management of future crises – other work had taken priority – and its expectation that it would publish a Report by the end of this academic year.²

At its meeting on 15 July, the Council agreed that it wished to clarify and strengthen the delegation of decision-making powers to sub-committees and individuals to enable quick decision-making in a crisis. The Council noted its two Notices in June 2020 recording decisions made during the initial phase of the pandemic between 16 March and 31 May 2020.³ It agreed that in the small number of cases where there was a breach of regulations, a different decision would be made now⁴ or changes have since been made to Ordinances to revise arrangements which were difficult to meet or unclear or are the subject of ongoing review. It also noted that some of the earliest and most consequential decisions during that phase concerned delegations of decision-making authority by the Council and the General Board. In March 2020, the Council agreed to delegate its authority to the Vice-Chancellor should significant, rapid and unexpected changes relating to the Covid-19 crisis require urgent decisions concerning the University's business. The Council also delegated authority to the chairs of the Council's committees to take such decisions as they consider necessary. The General Board gave similar delegations to the Vice-Chancellor and the chairs of its committees.

The Council will therefore consider proposed amendments to the provisions for delegation currently set out in Special Ordinance A (viii) 4, with a view to publishing a Report in Michaelmas Term 2024. It will also receive for review a draft scheme of delegation to improve the effectiveness and efficiency of the University's committee-based decision-making processes, which will in turn facilitate more effective management of a crisis.

Footnotes

- 1 *Reporter*, 6627, 2020–21, p. 768.
- 2 *Reporter*, 6726, 2023–24, p. 237.
- 3 *Reporter*, 2019–20: 6585, p. 454; 6586, p. 472.
- 4 For example, the *Reporter* would continue to be published weekly during term, even if a pause in normal committee business resulted in lighter issues.

Grants from the Colleges Fund

18 July 2024

The Council has received the following report from the Colleges Fund Committee, which it now publishes to the University in accordance with Regulation 4 for the Fund (*Statutes and Ordinances*, p. 1082).

- 1. The amount available in the Fund for distribution in 2023–24 is £5.815m.
- 2. The Colleges Fund Committee has approved the following grants to be paid in 2023–24:

Total Grant
£'000

St Edmund's College	1,246
Lucy Cavendish College	1,246
Hughes Hall	613
Wolfson College	928
Fitzwilliam College	615
Darwin College	848
Clare Hall	319

3. The allocation is calculated by taking account of the model of a 'standard' College with a basic requirement for endowment. The figures take account of the endowment requirements of the relevant Applicant College as estimated by the Committee's model having reference to numbers of undergraduate students, full-time equivalent postgraduate students, Fellows, and College Teaching Officers.

4. The Colleges Fund Committee has not approved any exceptional grants in addition to the endowment-based grants listed above.

Leadership of environmental sustainability

18 July 2024

The Council wishes to update the Regent House on leadership of environmental sustainability. At its meeting on 15 July, the Council approved two related proposals to provide leadership for environmental sustainability, one focused on academic leadership, the other to provide operational leadership.

Academic leadership for environmental sustainability

Mirroring a suggestion from Regent House members as part of comments on the proposal for a sixth Pro-Vice-Chancellor with responsibility for environmental sustainability, academic leadership will be provided by an existing Pro-Vice-Chancellor (PVC). 'Environmental Sustainability' will be added to the portfolio of the current PVC (Education) so that it becomes the PVC (Education and Environmental Sustainability). This change will take effect from 1 September 2024. This portfolio will be reviewed on any subsequent new appointment or reappointment to this particular office.

The brief for the environmental sustainability portfolio will be to develop an academic strategy that will integrate and enhance the University's interdisciplinary research strengths, capabilities and ambitions and will encompass its educational offerings and outreach activities. The PVC will also support and champion the University's climate and sustainability initiatives across the collegiate University, including Cambridge Zero, the Cambridge Conservation Initiative and the Cambridge Institute for Sustainability Leadership.

Operational leadership for environmental sustainability

The aim is for the University to have, by the end of the calendar year 2025 at the latest, an agreed approach to environmental sustainability which is sector-leading. This will include an ambitious strategy to achieve operational environmental sustainability, accompanied by a plan for delivery with firm, costed targets and clear KPIs against which progress can be measured; a clarified and strengthened governance structure to oversee progress; and a clear articulation of who, operationally, is responsible for delivering which aspects of the plan. Initially, the focus of this activity will be on climate and environmental sustainability but, over time and depending on progress, the scope may be broadened to cover social and other sustainability issues.

This ambition will be approached in two stages. Stage 1 will involve an assessment of the work done to date across the University in the five main areas of environmental sustainability – waste, water, carbon, biodiversity and transport. The assessment, which should be completed by the end of 2024, will provide recommendations for improvement, both operationally and in terms of the University's governance in this area, and identify early wins. It will also offer a broad strategic framework that could be developed in Stage 2.

Stage 2 will require the recruitment of an individual who has expertise in delivering stretching environmental sustainability objectives in complex organisations. Building on the assessment carried out in Stage 1, the individual will be responsible for developing and leading the implementation of the University's operational environmental sustainability strategy and plan. The person appointed will also be responsible for implementing the recommendations of the Stage 1 assessment (if approved by the Council), including embedding any governance changes. The position will be fixed term and the individual will report to the Vice-Chancellor.

Predictable Working Policy

18 July 2024

The Council and the General Board have approved a Predictable Working Policy, to ensure compliance with new government legislation due to come into effect this autumn. The Workers (Predictable Terms and Conditions) Act received royal assent on 16 October 2023 and aims to redress the balance of one-sided flexibility by providing employees, workers and agency workers with a statutory right to request more predictable terms and conditions if their existing working pattern lacks consistency. A 'work pattern' includes the number of hours, the days of the week and the times, or the duration, an individual is required to work. Subject to eligibility, those engaged on a fixed-term contract of 12 months or less can seek a longer term or an open-ended contract. A statutory request including any appeal must be concluded within one month of the application. The legislation is process-based and the Policy incorporates the Advisory, Conciliation and Arbitration Service guidance.

The Policy will be launched on the date the legislation comes into effect. The approved text of the Policy is available on the *Reporter* website at <https://www.admin.cam.ac.uk/cam-only/reporter/2023-24/weekly/6750/PredictableWorkingPolicy.pdf> (University account required).

Extension to the pilot of the Email Address Allocation and Retention Policy

18 July 2024

Further to the Notice published on 26 July 2023 (*Reporter*, 6710, 2022–23, p. 885), the General Board and the Council have approved a six-month **extension to the pilot**¹ of the **Email Address Allocation and Retention Policy**,² and a delay to the wider rollout of the policy from 1 September 2024 to 1 March 2025. To allow time for a period of preparation, communications to affected individuals did not commence until the end of January 2024. That preparation included agreeing draft communications, and ascertaining an approach to implementation with the three participating volunteer institutions. An extension will allow for the collection of sufficient data to assess whether and how the policy can be refined further, as well as ensure adequate time to put processes in place to enable a smooth rollout across the wider University. Any recommended changes to the policy resulting from the pilot will be considered by the General Board and the Council prior to the wider rollout.

The Email Address Allocation and Retention Policy sets out options for email address retention for email address users leaving the University who would not be eligible to retain their address under existing standard retention procedures. In the first three months of the pilot's operation, 326 email address users leaving the University were contacted by UIS to advise them of the options for email address retention. Only two of these users requested one of the forms of retention set out in the policy, and subsequently both were found to be eligible to retain their email addresses under existing procedures.

Footnotes

¹ See <https://help.uis.cam.ac.uk/service/email/address-allocation-policy/email-address-allocation-and-retention-policy-pilot>.

² See <https://help.uis.cam.ac.uk/service/email/address-allocation-policy>.

Lord's Bridge, Cambridge Road

Further to the Council's First-stage Report of 29 July 2020¹ and subsequent planning permission granted by South Cambridgeshire District Council in 2023, the Estates Committee has taken the decision not to pursue the proposed development of a solar farm at Lord's Bridge, Cambridge Road, Barton. Further work on the project has led to the conclusion that the construction and operation of the planned solar farm would have a sufficiently detrimental impact on the research undertaken at the Mullard Radio Astronomy Observatory that the simultaneous land uses at Lord's Bridge are incompatible.

Footnote

¹ *Reporter*: 6587, 2019–20, p. 551; 6593, 2020–21, p. 105.

Information

Link to Instagram video publications - <https://millsreeve.sharefile.eu/f/fo5bfe66-7ea8-4670-8df0-2d8c75ba0a4e>

- C4P Video 1
- C4P Video 2
- C4P Video 3
- C4P Video 4
- C4P Video 5
- C4P Video 6

Hundreds call for Cambridge to divest from Israel

Students gathered to call for University action on Palestine amid the ongoing Rafah airstrikes

by Felix Armstrong

This article is 1 year old
Friday February 16 2024,
12:10am



The protesters called for Cambridge to cut ties with the conflict
FELIX ARMSTRONG FOR VARSITY

Around 300 students gathered at Sidgwick Site in support of Palestine, calling for the University to divest from Israel.

The protest, held on Wednesday (14/02) at the University's main teaching site, was organised by the [Cambridge University Palestinian Solidarity Society](#), drawing attention to the Israeli airstrikes on Rafah, a small city in the Gaza Strip.

The protestors called on the University to cut its financial ties with Israel. Harvey Brown, the SU's welfare officer, said at the demonstration: "The names on the bombs that are being dropped on Rafah right now are the same as names on the spreadsheets that the University produces at the end of the financial year."

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The hundreds of attendees chanted: "We will not stop, we will not rest, Cambridge Uni must divest."

Protestors held Palestinian flags and placards, some of which read "Roses from the river to the sea, Palestine will be free."

NEWS COMMENT FEATURES INTERVIEWS SCIENCE LIFESTYLE CULTURE SPORT Q SHOP

Another speaker told students to email their College JCRs and local MPs to encourage boycotts of companies associated with Israel.



"People are talking too much about the Superbowl and not enough about Rafah," another speaker said.

The strikes on Rafah killed at least 67 Palestinians by Monday, according to the Hamas-run health ministry. The city's population has swelled from 250,000 to an estimated 1.5 million people following evacuations of the south of the Gaza Strip.

Humanitarian chief Martin Griffiths has said that the consequences of an invasion of Rafah would be "catastrophic".

Cambridge University was contacted for comment.

Support Varsity

Varsity is the independent newspaper for the University of Cambridge, established in its current form in 1947. In order to maintain our editorial independence, our print newspaper and news website receives no funding from the University of Cambridge or its constituent Colleges.

We are therefore almost entirely reliant on advertising for funding and we expect to have a tough few months and years ahead.

In spite of this situation, we are going to look at inventive ways to look at serving our readership with digital content and of course in print too!

Therefore we are asking our readers, if they wish, to make a donation from as little as £1, to help with our running costs. Many thanks, we hope you can help!

Donate button with logos for Visa, Mastercard, American Express, and PayPal.

UNIBET advertisement for Big Bass Splash featuring a fish and a 'REGISTER' button.

BACK TO TOP

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

BETWEEN:

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

Claimant

and

PERSONS UNKNOWN AS DESCRIBED
IN THE CLAIM FORM

Defendants

and

THE EUROPEAN LEGAL SUPPORT
CENTRE

Intervener

SECOND WITNESS STATEMENT OF
SAMUEL JOSEPH MAW

I, Samuel Joseph Maw, solicitor at Mills & Reeve LLP, Botanic House, 100 Hills Rd, Cambridge CB2 1PH, will say as follows:

- 1 I make this statement in support of the Claimant's application for a precautionary injunction. I am the solicitor with conduct of this matter on behalf of the Claimant (hereinafter referred to as "**the University**") and confirm that I am duly authorised to make this witness statement on behalf of the University. The purpose of this statement is to confirm the steps which the University has taken to notify the Defendants of the Order dated 27 February 2025 ("**the Order**") and the notice of hearing on 19 March 2025.
- 2 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.

- 3 There is now produced and shown to me a bundle of documents marked “SM2” to which I refer to in this witness statement. References to page numbers are to pages of “SM2”.
- 4 On 28 February 2025 and by 10.27am, a copy of the Order and documents referred to in the Order were uploaded to the University’s website as shown by the webpage at page 1 of the exhibit.
- 5 On 28 February 2025, emails were sent to each of the known email addresses for Cambridge for Palestine and the Intervener, attaching a copy of the Order and directing them to Claimant’s website to obtain copies of the documents referred to in the Order. Copies of the emails can be found at pages 3 and 4.
- 6 On 28 February 2025, the Order and warning notices were affixed on a prominent position on the Senate House Yard Gates and Senate House Passage Gate, at the locations shown on Plan 1 attached to the Order marked with an ‘X’. A copy of the witness statement from the process server who was instructed to fix these notices can be found at pages 15 – 32.
- 7 On 5 March 2025, an email was sent from Mills & Reeve LLP to the Intervener which informed them that a hearing had been listed for 19 March 2025. On 6 March 2025, an email was sent from Mills & Reeve LLP to each of the known email addresses for Cambridge for Palestine which informed them that a hearing had been listed for 19 March 2025. On 7 March 2025, a further email was sent from Mills & Reeve LLP to each of the known email addresses for Cambridge for Palestine and the Intervener which confirmed that the hearing would take place on 19 March 2025 (as there was some uncertainty prior to this over the availability of the Intervener’s Counsel). Copies of the relevant emails can be found at pages 5 – 7.
- 8 On 6 March 2025, a notice of the hearing on 19 March 2025 was uploaded to the University’s website as shown by the webpage at page 8.
- 9 On 6 March 2025, the Claimant’s security staff affixed notices of the hearing on 19 March 2025 at Greenwich House, the Senate House Yard Gates and Senate House Passage Gate, and the Archway to The Old Schools, at the locations shown on Plans 1 and 2 contained in the Schedule to the draft Order which accompanied the Claimant’s application dated 12 February 2025 and marked with an ‘X’. Photographic evidence and a security log confirming the same can be found at pages 9 – 14.

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.

A handwritten signature in blue ink that reads "Samuel Maw". The signature is written in a cursive style with a large initial 'S'.

Signed:

Name: SAMUEL JOSEPH MAW

Dated: 11/3/ 2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

BETWEEN:

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

Claimant

and

PERSONS UNKNOWN AS DESCRIBED
IN THE CLAIM FORM

Defendants

and

THE EUROPEAN LEGAL SUPPORT
CENTRE

Intervener

EXHIBIT SM2

Interim injunction granted in connection with Senate House and Senate House Yard following hearing on 27 February 2025


Last updated: 28 Feb 2025

To view the Order and Judgment, please follow the links below


Order dated 27 February 2025:


 [kings_bench_associates_order.pdf](https://www.cam.ac.uk/sites/default/files/kings_bench_associates_order.pdf) (https://www.cam.ac.uk/sites/default/files/kings_bench_associates_order.pdf) (266.72 KB)


Judgment of Fordham J [2024] EWHC 454 (KB) (approved subject to typos):

 [cambridge_kb_2025_000497_fordham_j_judgment_27.2.25_approved_subject_to_typos.pdf](https://www.cam.ac.uk/sites/default/files/cambridge_kb_2025_000497_fordham_j_judgment_27.2.25_approved_subject_to_typos.pdf)
(https://www.cam.ac.uk/sites/default/files/cambridge_kb_2025_000497_fordham_j_judgment_27.2.25_approved_subject_to_typos.pdf) (261.84 KB)


To view the applications and skeleton argument of the Intervener, European Legal Support Centre (ELSC), please follow the links below:


 [application_notice_filed_by_the_elsc_dated_26_february_2025.pdf](https://www.cam.ac.uk/sites/default/files/application_notice_filed_by_the_elsc_dated_26_february_2025.pdf)
(https://www.cam.ac.uk/sites/default/files/application_notice_filed_by_the_elsc_dated_26_february_2025.pdf) (450.49 KB)


 [elscs_skeleton_argument_dated_27_february_2025.pdf](https://www.cam.ac.uk/sites/default/files/elscs_skeleton_argument_dated_27_february_2025.pdf)
(https://www.cam.ac.uk/sites/default/files/elscs_skeleton_argument_dated_27_february_2025.pdf) (204.97 KB)

 [witness_statement_of_anna_ost_dated_26_february_2025_0.pdf](https://www.cam.ac.uk/sites/default/files/witness_statement_of_anna_ost_dated_26_february_2025_0.pdf)
(https://www.cam.ac.uk/sites/default/files/witness_statement_of_anna_ost_dated_26_february_2025_0.pdf) (7.79 MB)

To view the correspondence and associated documents from other interested parties, please follow the links below:

 [email_sent_by_the_un_special_rapporteur_of_freedom_of_assembly_and_association_to_the_claimant_dated_27_february_2025.pdf](https://www.cam.ac.uk/sites/default/files/email_sent_by_the_un_special_rapporteur_of_freedom_of_assembly_and_association_to_the_claimant_dated_27_february_2025.pdf)
(https://www.cam.ac.uk/sites/default/files/email_sent_by_the_un_special_rapporteur_of_freedom_of_assembly_and_association_to_the_claimant_dated_27_february_2025.pdf) (368.86 KB)

 [letter_sent_by_liberty_to_the_court_dated_26_february_2025.pdf](https://www.cam.ac.uk/sites/default/files/letter_sent_by_liberty_to_the_court_dated_26_february_2025.pdf)
(https://www.cam.ac.uk/sites/default/files/letter_sent_by_liberty_to_the_court_dated_26_february_2025.pdf) (159.43 KB)

 [statement_from_the_un_special_rapporteur_dated_2_october_2024.pdf](https://www.cam.ac.uk/sites/default/files/statement_from_the_un_special_rapporteur_dated_2_october_2024.pdf)
(https://www.cam.ac.uk/sites/default/files/statement_from_the_un_special_rapporteur_dated_2_october_2024.pdf) (1.03 MB)



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Media enquiries

Matthew Norton

868

Published

28 Feb 2025

Samuel Maw

From: MillsReeve100
Sent: 28 February 2025 10:23
To: encampmentnegotiations@proton.me; cambridge4palestine@proton.me;
bloodonyourhands@systemli.org
Cc: Emma Rampton
Subject: KB-2025-000497 [M&R-CLIENTDMS.FID3724486]
Attachments: King's Bench Associate's - Order.pdf

To Members of Cambridge for Palestine

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

-v-

PERSONS UNKNOWN

-v-

THE EUROPEAN LEGAL SUPPORT CENTRE

We write in connection with the above proceedings.

Following the hearing on 27 February 2025, we attach a copy of the Order made.

The documents referred to in the Order will be available very shortly by viewing the Claimant's website: [Latest notices | University of Cambridge](#) (www.cam.ac.uk/notices).

Yours faithfully

Mills & Reeve LLP

Samuel Maw

From: MillsReeve100
Sent: 28 February 2025 10:25
To: [REDACTED] ELSC
Cc: [REDACTED] | ELSC
Subject: KB-2025-000497 [M&R-CLIENTDMS.FID3724486]
Attachments: King's Bench Associate's - Order.pdf

Importance: High

Dear ELSC

THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE
-v-
PERSONS UNKNOWN
-v-
THE EUROPEAN LEGAL SUPPORT CENTRE

We write in connection with the above proceedings.

Following the hearing on 27 February 2025, we attach a copy of the Order made.

The documents referred to in the Order will be available very shortly by viewing the Claimant's website: [Latest notices | University of Cambridge \(www.cam.ac.uk/notices\)](#).

Please acknowledge receipt.

Yours faithfully

Mills & Reeve LLP

Samuel Maw

From: Samuel Maw
Sent: 05 March 2025 11:17
To: [REDACTED] | ELSC
Cc: [REDACTED]
Subject: KB-2025-000497 [M&R-CLIENTDMS.FID3724486]
Attachments: RE: Cambridge KB 2025 000497 [M&R-CLIENTDMS.FID3724486]
Importance: High

Dear ELSC

We write in relation to the above claim.

We have received notification from the court that a hearing has been listed for 19 March 2025 (see attached).

We understand that your Counsel may not be available for this date (based on discussions between Counsels' clerks). We thought the listing office would be liaising with the intervener / their Counsel regarding availability but it appears not (so apologies for any misunderstanding).

Please can you confirm as soon as possible today your availability for a hearing on or before 26 March. We understand that your Counsel may be available on 24 March but it would be useful if several options could be provided.

Our Counsel's clerk (copied) will then liaise with the listing office regarding an alternative date.

Yours faithfully

Mills & Reeve LLP

Samuel Maw

From: MillsReeve100
Sent: 06 March 2025 11:09
To: encampmentnegotiations@proton.me; bloodonyourhands@systemli.org;
cambridge4palestine@proton.me
Cc: [REDACTED] ELSC
Subject: KB-2025-000497 [M&R-CLIENTDMS.FID3724486]

To Members of Cambridge for Palestine

KB-2025-000497

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

-v-

PERSONS UNKNOWN (AS DESCRIBED ON THE CLAIM FORM)

We write in connection with the above proceedings.

We write to notify you that the Court has listed a return date for 19 March 2025 with a 1-day time estimate. The Judge, court room and time of the hearing will be confirmed the working day before on the cause list.

Please note that we understand that ELSC's Counsel may not be available for this date so there is a possibility this date could be moved, be we wanted to notify you of the listing date as it stands.

Yours faithfully

Mills & Reeve LLP

Samuel Maw

From: MillsReeve100
Sent: 07 March 2025 09:53
To: encampmentnegotiations@proton.me; bloodonyourhands@systemli.org;
cambridge4palestine@proton.me
Cc: [REDACTED] | ELSC
Subject: RE: KB-2025-000497 [M&R-CLIENTDMS.FID3724486]

To Members of Cambridge for Palestine

KB-2025-000497

THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE
-v-
PERSONS UNKNOWN (AS DESCRIBED ON THE CLAIM FORM)

We write in connection with the above proceedings.

We understand ELSC's Counsel is available for the hearing listed on 19 March 2025 and therefore will be going ahead on this date.

Yours faithfully

Mills & Reeve LLP

From: MillsReeve100
Sent: 06 March 2025 11:09
To: encampmentnegotiations@proton.me; bloodonyourhands@systemli.org;
cambridge4palestine@proton.me
Cc: [REDACTED] | ELSC <anna@elsc.support>
Subject: KB-2025-000497 [M&R-CLIENTDMS.FID3724486]

To Members of Cambridge for Palestine

KB-2025-000497

THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE
-v-
PERSONS UNKNOWN (AS DESCRIBED ON THE CLAIM FORM)

We write in connection with the above proceedings.

We write to notify you that the Court has listed a return date for 19 March 2025 with a 1-day time estimate. The Judge, court room and time of the hearing will be confirmed the working day before on the cause list.

Please note that we understand that ELSC's Counsel may not be available for this date so there is a possibility this date could be moved, be we wanted to notify you of the listing date as it stands.

Yours faithfully

Mills & Reeve LLP

Notices

Notice of hearing on 19 March 2025

Last updated: 06 Mar 2025

Important notice of a court hearing on 19 March 2025.

[View the notice of hearing](#)

https://www.cam.ac.uk/sites/default/files/notice_of_hearing_-_19th_march_2025753559372.1.pdf



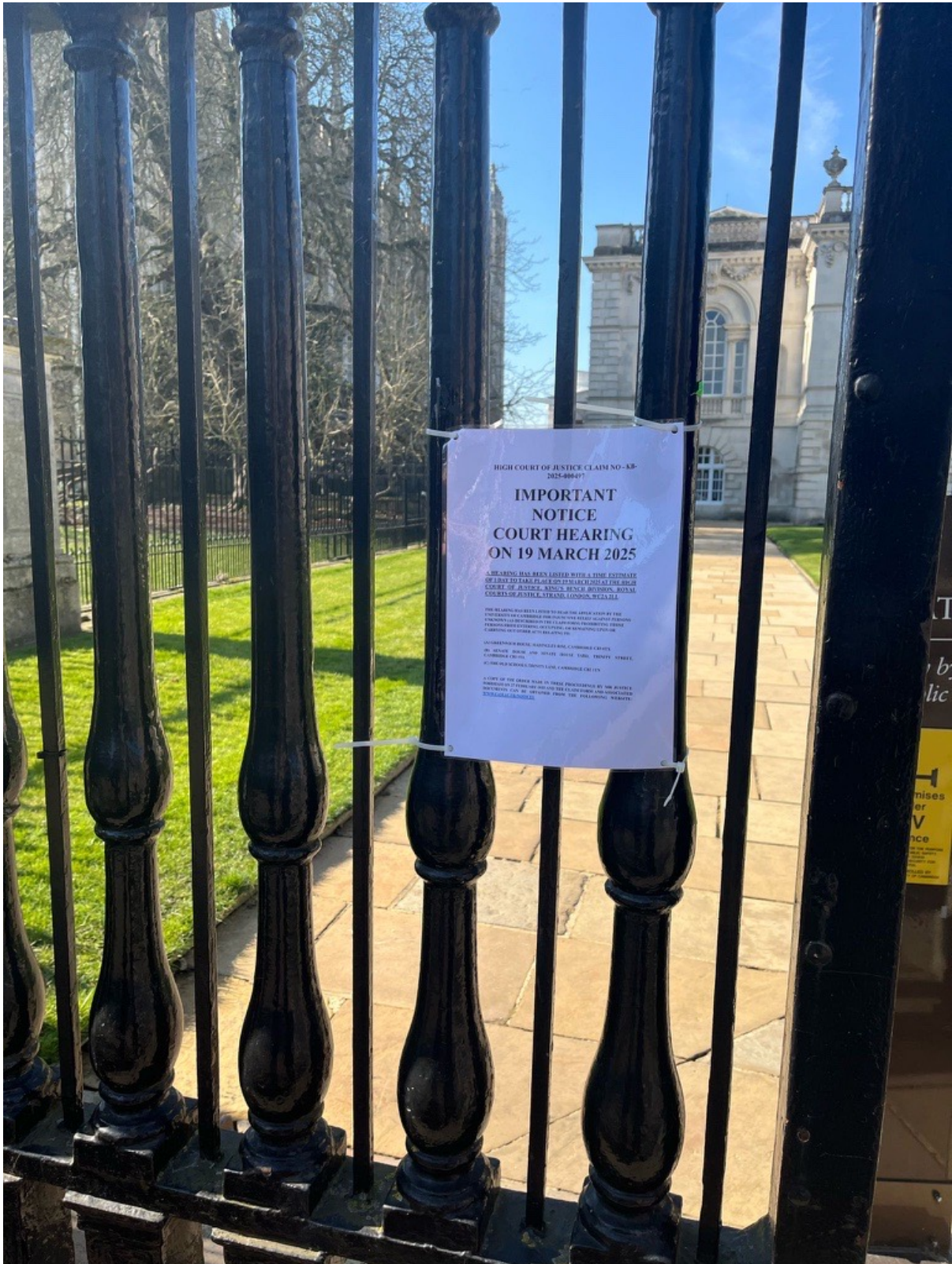
<https://creativecommons.org/licenses/by-nc-sa/4.0/>

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Published

06 Mar 2025

Old Schools: Ryder and Aimees Gate



Old Schools: East Gate



Old Schools: Senate House Passage Gate



Old Schools: West Courtyard



Greenwich House: Front door



Peter,

To confirm, [REDACTED] and I have @13:11hrs on the 06th March 2025, erected the new injunction notices at the following locations:

Old Schools: Ryder and Aimees Gate

Old Schools: East Gate

Old Schools: Senate House Passage Gate

Old Schools: West Courtyard

Greenwich House: Front door

Kind regards

[REDACTED]

[REDACTED]

Cockcroft Building | New Museums Site | Cambridge | CB2 3QY |

Tel: 01223 330710 | 01223 331818 | Email: apc42r@admin.cam.ac.uk

Second statement on behalf of the
Deponent: Mark Lee
First Statement
Exhibits: 'A' 'B' Dated:
As Dated

Claim No:
KB-2025-000497

BETWEEN

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

Applicant

-v-

PERSONS UNKNOWN

&

The European Legal Support Centre

Respondents

SECOND STATEMENT OF PROCESS SERVER

I, Mark Lee, of Elite Enforcement Services Ltd, Fulford House, Newbold Terrace, Leamington Spa, Warwickshire, CV32 4EA, and for the purpose of this service instructed by Mills & Reeve Solicitors LLP, Botanic House, 100 Hills Rd, Cambridge CB2 1PH – Solicitors for the applicant.

I state as follows:

- 1) That except where otherwise stated to the contrary this statement is made of my own knowledge of the matters referred to.
- 2) At 11:00hrs on Friday 28 February 2025, copies of the following documents were affixed at the following locations : (1) Senate House, Trinity Street, Cambridge, CB2 1TA and (2) Senate House Yard, Trinity Street, Cambridge, CB2 1TA by attaching notices to gates / railings in clear document holders at the locations marked with an "x" on plan 1 as marked out in the schedule to the Order dated 28 February 2025: -
 - a) 'Order dated 28 February 2025'
 - b) 'Warning Notice'
- 3) That there is now produced and shown to be marked 'A' and marked 'B' copies of the said documents so served by me, along with photos of the said documents in situ as marked 'C'.

STATEMENT OF TRUTH

I believe the facts contained in this Certificate 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:

Printed: Mark Lee Date: 10 March 2025

882

Statement on behalf of the Applicant
Deponent: Mark Lee
Second Statement
Exhibits: 'A' Dated: As
Dated

Claim No:
KB-2025-000497

BETWEEN

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

Applicant

-v-

PERSONS UNKOWN

&

The European Legal Support Centre

Respondents

EXHIBIT A

This is Exhibit A referred to in the Statement of Mark Lee.



IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION
Before Mr Justice Fordham
On 27 February 2025

CLAIM NO: KB-2025-000497

BETWEEN:-

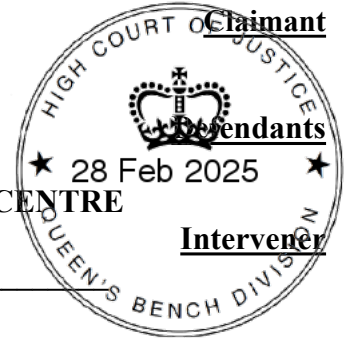
**CHANCELLOR, MASTERS AND SCHOLARS
OF THE UNIVERSITY OF CAMBRIDGE**

- v -

PERSONS UNKNOWN

- and -

THE EUROPEAN LEGAL SUPPORT CENTRE



ORDER

KB-2025-000497

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

**IMPORTANT NOTICE TO THE DEFENDANTS
AND PERSONS UNKNOWN**

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimant's claim by Claim Form, dated 12 February 2025, and its application for a final injunction, dated 12 February 2025

AND UPON hearing the Claimant's application for a final injunction, dated 12 February 2025, and reading the supporting evidence

AND UPON hearing the application by the Intervener dated 26 February 2025 to be joined as an Intervener and for an adjournment of the Claimant's application for an injunction

AND UPON hearing Counsel for the Claimant and Counsel for the Intervener on 27 February 2025



AND UPON the Claimant giving and the Court accepting the undertaking set out in Schedule 2 to this Order

AND UPON the “Land” being defined as Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA as shown for identification edged red on the attached Plan 1 in Schedule 1

AND UPON “Defendants” being defined so as to include “Persons Unknown”

AND UPON the Court giving judgment [2024] EWHC 454 (KB)

AND UPON paragraphs 8 to 11 of this Order being pursuant to the guidance in Wolverhampton CC v London Gypsies & Travellers [2023] UKSC 47

IT IS ORDERED THAT:

INJUNCTION

1. Until 23:00 on Saturday 1 March 2025, the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon the Land.
2. Until 23:00 on Saturday 1 March 2025, the Defendants must not, without the consent of the Claimant, erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.
3. In respect of paragraphs 1-2, the Defendants must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

VARIATION

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR r.6.16, r.6.28 and r.81.4(2)(c).
8. The Claim Form, Application Notice and evidence in support will be notified to Persons Unknown by the Claimant carrying out each of the following steps: (1) Uploading a copy onto the following website: www.cam.ac.uk/notices. (2) Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above. (3) Affixing a notice at those locations marked with an “x” on Plan 1 and 2 (of the Plans accompanying the Claim and Application Notice) setting out where these documents can be found and obtained in hard copy.
9. This Order shall be notified to Persons Unknown by the Claimant carrying out each of the following steps: (1) Uploading a copy of the Order onto the following



website: www.cam.ac.uk/notices. (2) Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order. (3) Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations on the edge of the Land marked with an “x” on Plan 1. (4) Affixing warning notices of A4 size at those locations on the edge of the Land marked with an “x” on Plan 1.

10. Notification to Persons Unknown of any further applications shall be effected by the Claimant carrying out each of the following steps: (1) Uploading a copy of the application onto the following website: www.cam.ac.uk/notices. (2) Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above. (3) Affixing a notice at those locations on the edge of the Land marked with an “x” on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.
11. Notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(1)-(2) only.
12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(3), 9(3)-(4) and 10(3), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

APPLICATION BY THE INTERVENER

14. The European Legal Support Centre is joined as an Intervener to these proceedings, pursuant to CPR r.19.2.

FURTHER DIRECTIONS

15. A return date in this matter to be listed for the first available date after 17 March 2025, at which hearing the Claimant’s application for an injunction dated 12 February 2025 can be further considered, to which extent the application stands adjourned by this Order.
16. The Claimant is to promptly upload all applications or written submissions made in these proceedings to www.cam.ac.uk/notices as well as the following documents: (1) The application notice filed by the European Legal Support Centre, dated 26 February 2025, together with the witness statement of Anna Ost, dated 26 February 2025 and the Skeleton Argument, dated 27 February 2025. (2) The letter sent by Liberty to the Court, dated 26 February 2025. (3) The email sent by the UN Special Rapporteur of Freedom of Assembly and Association for to the Claimant, dated 27 February 2025. (4) The Statement from the UN Special Rapporteur dated 2 October 2024. (5) The judgment of Fordham J [2024] EWHC 454 (KB).
17. Any contempt application against any Person Unknown may only be brought with the permission of the Court.
18. Liberty to apply.



19. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

20. The Claimant's solicitors and their contact details are: Mills & Reeve LLP, Botanic House, 100 Hills Rd, Cambridge, CB2 1PH. Ref: 0001200-1698. Email address: millsreeve100@mills-reeve.com.

Fordham J
DATED 27.2.25

BY ORDER OF THE COURT

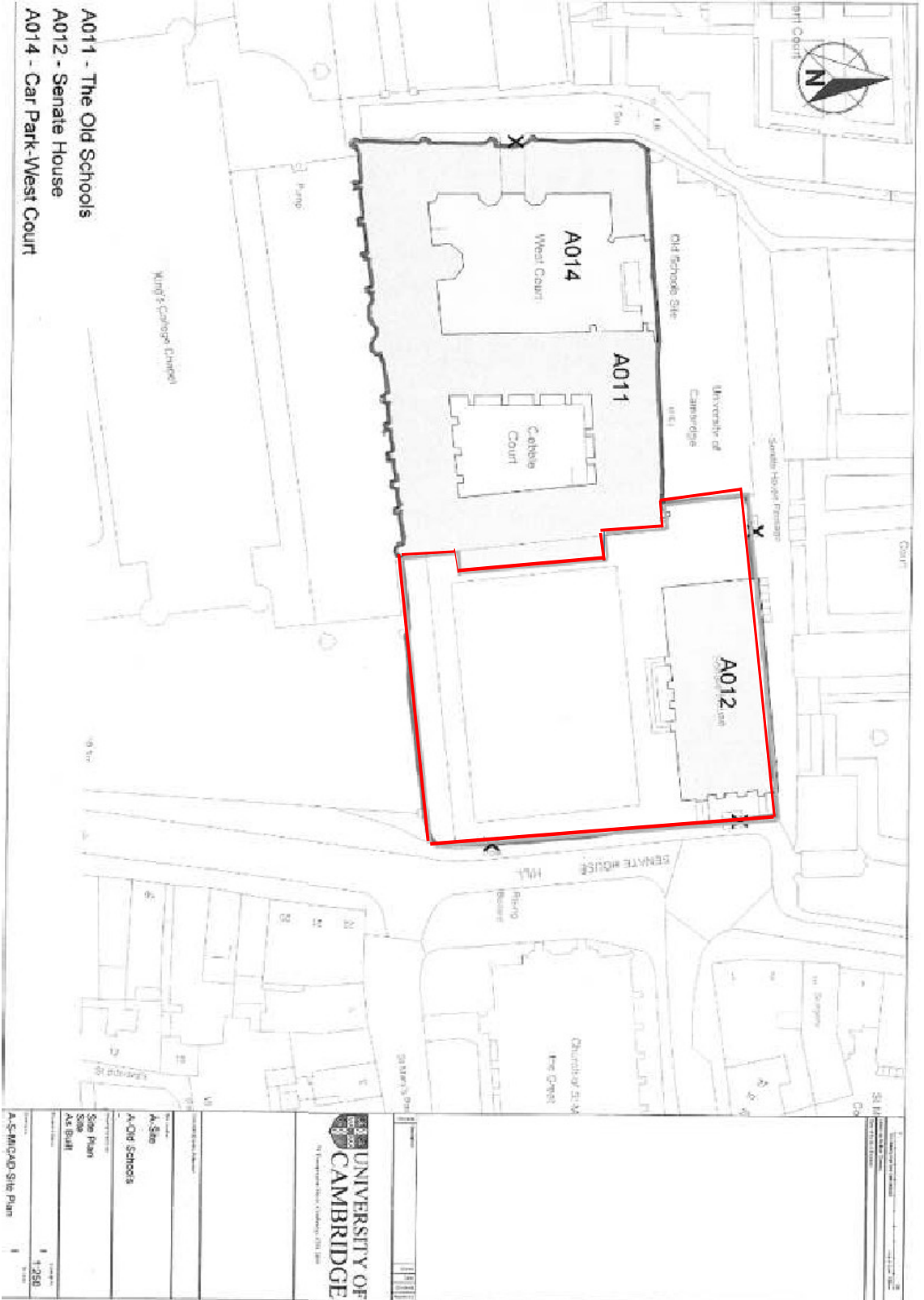
NOTE: This Order takes effect from the date on which it was made. A sealed copy is and will be available from the Court Office.

Dated: 27 February 2025

Schedules 1-3 follow:



SCHEDULE 1 – PLAN 1



**SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANT**

The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunctions in paragraphs 1-2 of this Order have caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- cambridge4palestine@proton.me
- encampmentnegotiations@proton.me
- bloodonyourhands@systemli.org

Statement on behalf of the Applicant
Deponent: Mark Lee
Second Statement
Exhibits: 'A' 'B' Dated:
As Dated

Claim No:
KB-2025-000497

BETWEEN

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

Applicant

-v-

PERSONS UNKOWN

&

The
European
Legal
Support
Centre
Respondents

EXHIBIT B

This is Exhibit B referred to in the Statement
of Mark Lee.

WARNING

HIGH COURT INJUNCTION IN FORCE

FROM THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE (“THE UNIVERSITY OF CAMBRIDGE”):

ON 27 FEBRUARY 2025 MR JUSTICE FORDHAM SITTING IN THE HIGH COURT OF JUSTICE (KB-2025-000497) MADE AN ORDER PROHIBITING ANY PERSON FROM CARRYING OUT ANY OF THE FOLLWING ACTS WITHOUT THE PERMISSION OF THE UNIVERSITY OF CAMBRIDGE:

- 1. TO ENTER, OCCUPY OR REMAIN UPON, OR**
- 2. ERECT OR PLACE ANY STRUCTURE (INCLUDING, FOR EXAMPLE, TENTS OR OTHER SLEEPING EQUIPMENT) ON,**

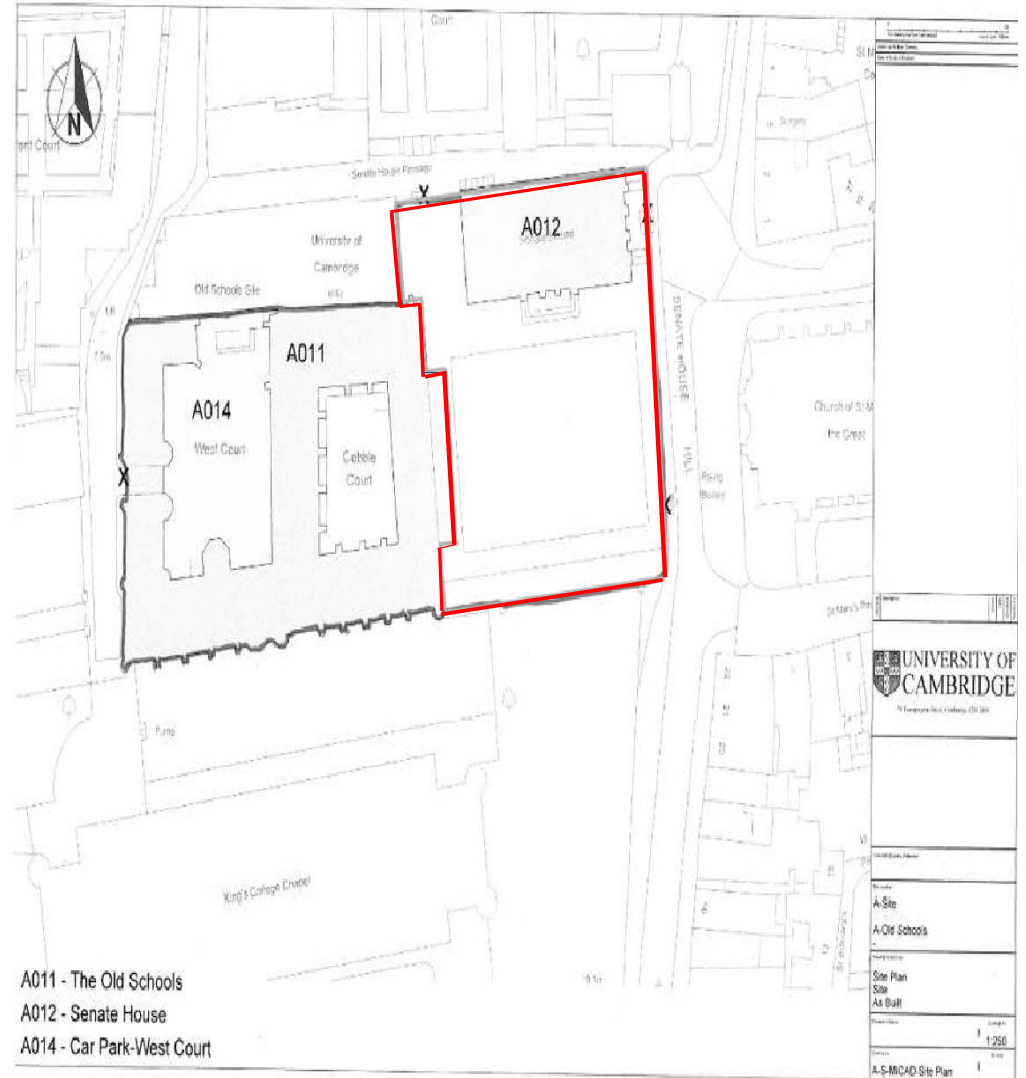
SENATE HOUSE AND SENATE HOUSE YARD, TRINITY STREET, CAMBRIDGE, CB2 1TA, WHICH IS SHOWN EDGED RED ON THE PLAN

THIS PROHIBITION WILL BE IN FORCE UNTIL 11:00PM ON SATURDAY 1 MARCH 2025

FOR THE AVOIDANCE OF DOUBT THE ORDER DOES NOT PROHIBIT ACTIVITIES OUTSIDE SENATE HOUSE AND SENATE HOUSE YARD AS EDGED RED ON THE PLAN

A FULL COPY OF THE ORDER AND RELEVANT COURT DOCUMENTS CAN BE FOUND ONLINE HERE: WWW.CAM.AC.UK/NOTICES

IF YOU BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED



Deponent: Mark Lee
Second Statement

Second statement on behalf of the
Exhibits: 'C' Dated: As
Dated

Claim No:
KB-2025-000497

BETWEEN

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

Applicant

-v-

PERSONS UNKOWN

&

The European Legal Support Centre

Respondents

EXHIBIT C

This is Exhibit C referred to in the Statement of Mark Lee.

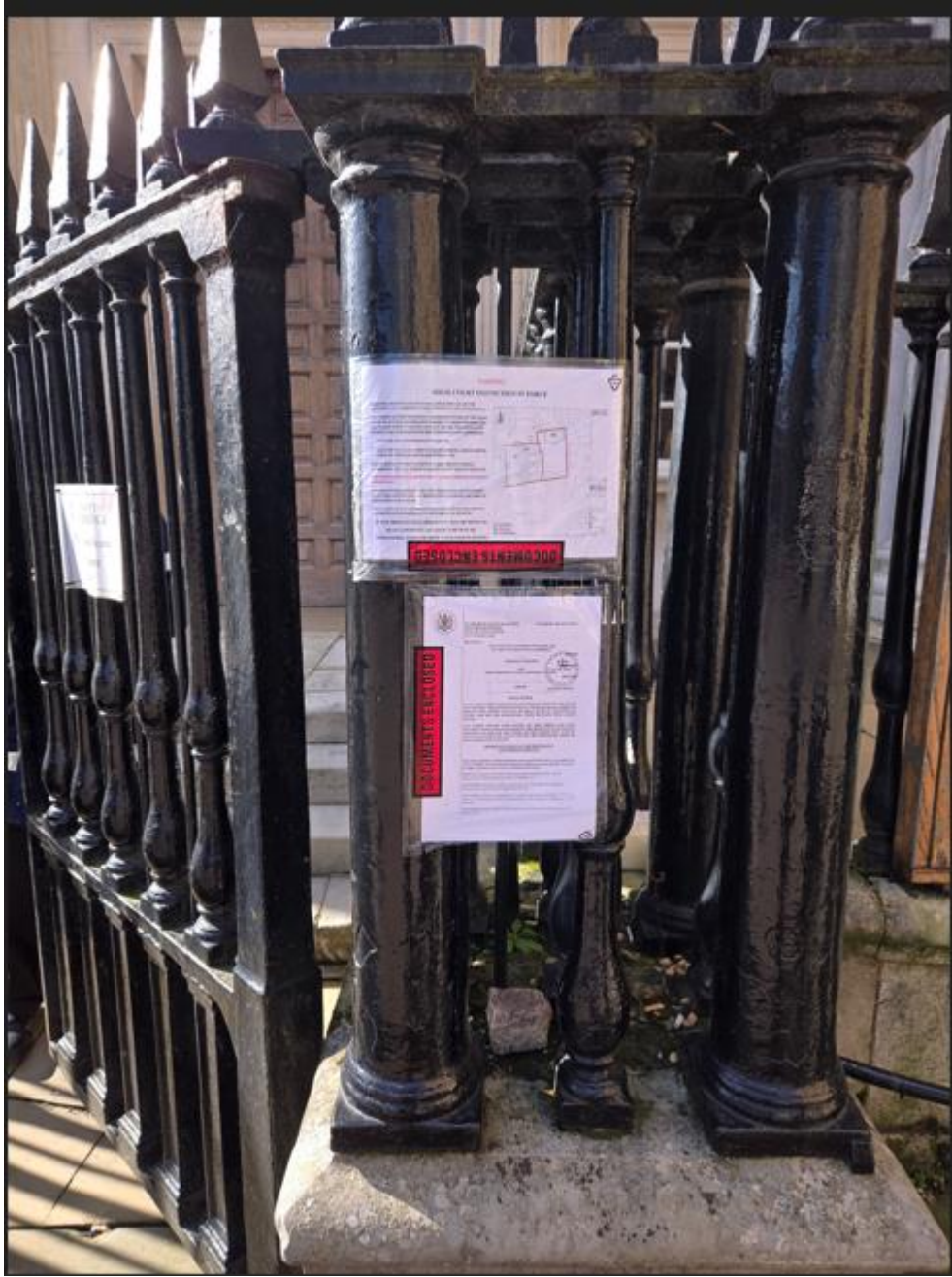
Statement on behalf of the Applicant













IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

BETWEEN:

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

Claimant

and

PERSONS UNKNOWN AS DESCRIBED
IN THE CLAIM FORM

Defendants

and

THE EUROPEAN LEGAL SUPPORT
CENTER

Intervener

THIRD WITNESS STATEMENT OF
SAMUEL JOSEPH MAW

I, Samuel Joseph Maw, solicitor at Mills & Reeve LLP, Botanic House, 100 Hills Rd, Cambridge CB2 1PH, will say as follows:

- 1 I make this statement in support of the Claimant's application for a precautionary injunction. I am the solicitor with conduct of this matter on behalf of the Claimant (hereinafter referred to as "**the University**") and confirm that I am duly authorised to make this witness statement on behalf of the University. The purpose of this statement is to confirm the steps which the University has taken to notify the Defendants and Intervener of the application dated 13 March 2025 ("**the Application**").
- 2 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.

- 3 There is now produced and shown to me a bundle of documents marked "SM3" to which I refer to in this witness statement. References to page numbers are to pages of "SM3".
- 4 On 13 March 2025 and by 16:54, a copy of the Application was uploaded to the University's website as shown by the webpage at page 1.
- 5 On 13 March 2025, emails were sent to each of the known email addresses for Cambridge for Palestine and the Intervener, attaching a copy of the Application. Copies of the emails can be found at pages 2 and 3.
- 6 On 13 March 2025, the Claimant's security staff affixed a notice (see page 4), stating that an Application has been made and that the Application can be found at the website referred to above, at Greenwich House, the Senate House Yard Gates and Senate House Passage Gate, and the Archway to The Old Schools, at the locations shown on Plans 1 and 2 contained in the Schedule to the draft Order which accompanied the Claimant's application dated 12 February 2025 and marked with an 'X'. Photographic evidence confirming the affixing of the notices can be found at pages 5 - 9.

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: SAMUEL JOSEPH MAW

Dated: 13/3/2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

BETWEEN:

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

Claimant

and

PERSONS UNKNOWN AS DESCRIBED
IN THE CLAIM FORM

Defendants

and

THE EUROPEAN LEGAL SUPPORT
CENTER

Intervener

EXHIBIT SM3

Court application dated 13 March 2025 to amend Claim Form and Particulars of Claim in connection with a precautionary injunction to restrain trespass at Greenwich House and The Old Schools / Senate House Site to be heard on 19 March 2025

Last updated: 13 Mar 2025

[View the application](#)

<https://www.cam.ac.uk/sites/default/files/application.pdf> (PDF)

Court application dated 13 March 2025 to amend Claim Form and Particulars of Claim in connection with a precautionary injunction to restrain trespass at Greenwich House and The Old Schools / Senate House Site to be heard on 19 March 2025



<https://creativecommons.org/licenses/by-nc-sa/4.0/>.

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Published

13 Mar 2025

Matthew McGarvey

From: MillsReeve100
Sent: 13 March 2025 15:31
To: encampmentnegotiations@proton.me; cambridge4palestine@proton.me;
bloodonyourhands@systemli.org
Cc: Emma Rampton
Subject: RE: KB-2025-000497 [M&R-CLIENTDMS.FID3724486]
Attachments: Application.pdf

Importance: High

To Members of Cambridge for Palestine

Further to our email below, please find attached an application to amend which we are filing at Court this afternoon, which will also shortly be available on the website at [Latest notices | University of Cambridge](#) (www.cam.ac.uk/notices).

Yours faithfully

Mills & Reeve LLP

From: MillsReeve100
Sent: 13 March 2025 10:59
To: encampmentnegotiations@proton.me; cambridge4palestine@proton.me;
bloodonyourhands@systemli.org
Cc: Emma Rampton <Emma.Rampton@admin.cam.ac.uk>
Subject: RE: KB-2025-000497 [M&R-CLIENTDMS.FID3724486]
Importance: High

To Members of Cambridge for Palestine

THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE
-v-
PERSONS UNKNOWN
-v-
THE EUROPEAN LEGAL SUPPORT CENTRE

We write in advance of the hearing on 19 March.

We attach a draft order. You will see that the University will be seeking interim relief until 26 July 2025.

You will note that the draft order follows the formulation of “persons unknown” adopted by Fordham J in his order of 27th February and it is our client’s intention to file an application today to amend the description of the Defendants, to be heard at the hearing on 19 March.

Yours faithfully

Mills & Reeve LLP

Matthew McGarvey

From: MillsReeve100
Sent: 13 March 2025 15:28
To: Anna Ost | ELSC
Cc: Katy Watts
Subject: RE: KB-2025-000497; THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE v PERSONS UNKNOWN [M&R-CLIENTDMS.FID3724486]
Attachments: Application.pdf

Dear European Legal Support Center

Further to our email below, please find attached an application to amend which we are filing at Court this afternoon, which will also shortly be available on the website at [Latest notices | University of Cambridge](#)

Yours faithfully

Mills & Reeve LLP

From: Samuel Maw
Sent: 13 March 2025 10:58
To: Anna Ost | ELSC <anna@elsc.support>
Cc: Katy Watts <katyw@libertyhumanrights.org.uk>
Subject: RE: KB-2025-000497; THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE v PERSONS UNKNOWN [M&R-CLIENTDMS.FID3724486]
Importance: High

Dear European Legal Support Center

We write in advance of the hearing on 19 March. Apologies this draft order has been sent across later than planned.

We attach a draft order. You will see that the University will be seeking interim relief until 26 July 2025.

You will note that the draft order follows the formulation of “persons unknown” adopted by Fordham J in his order of 27th February and it is our client’s intention to file an application today to amend the description of the Defendants, to be heard at the hearing on 19 March.

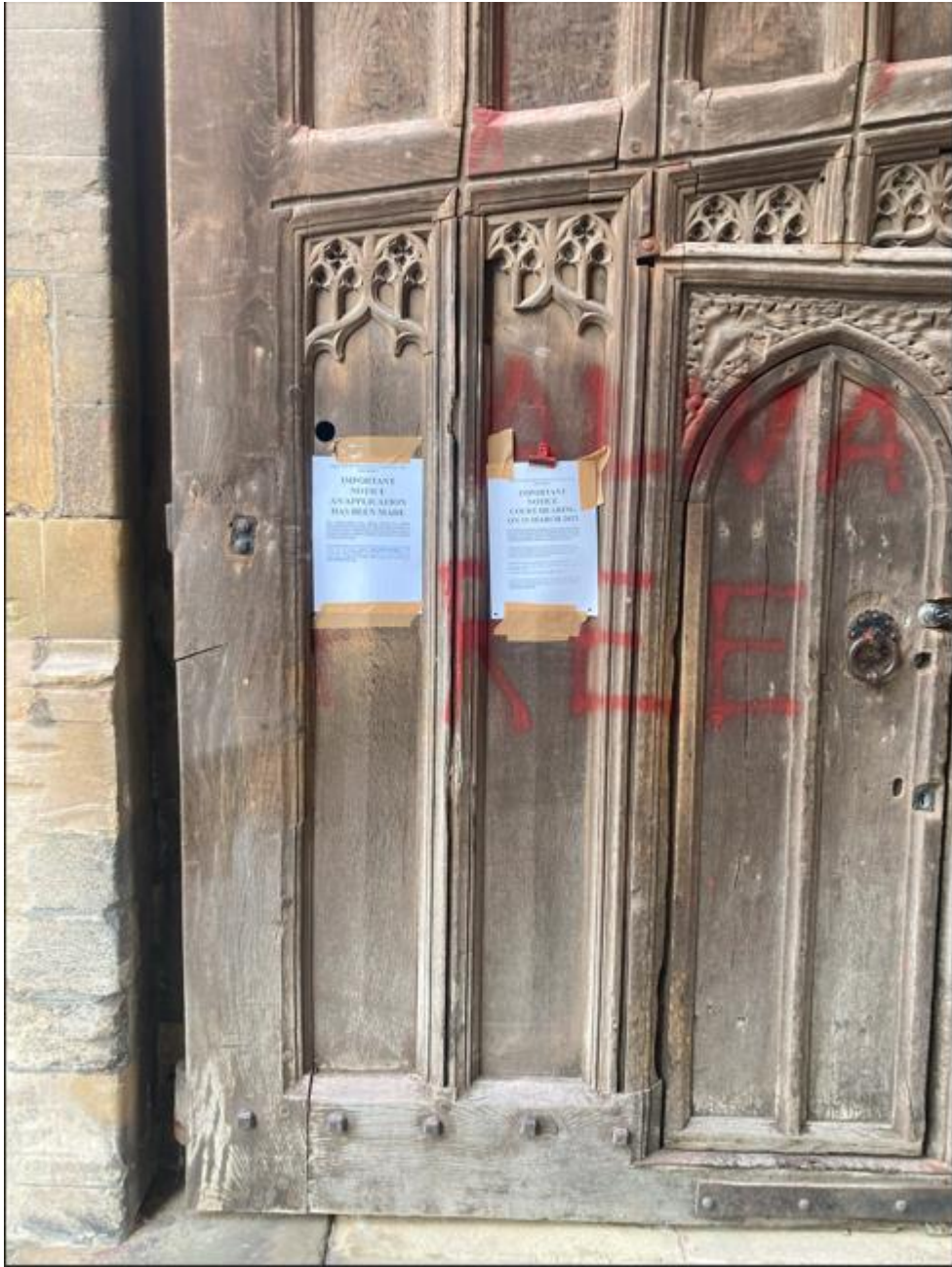
Yours faithfully

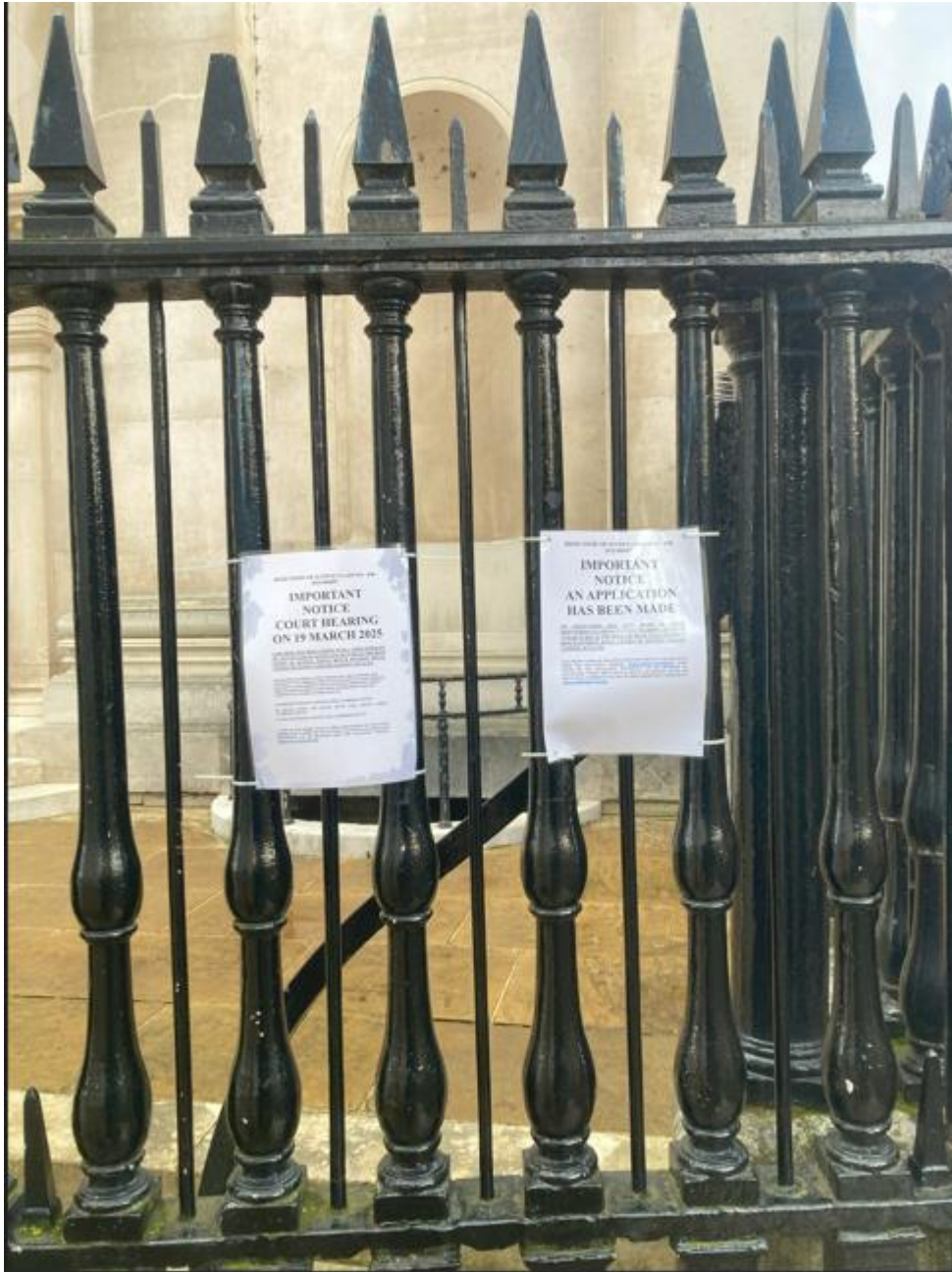
Mills & Reeve LLP

**IMPORTANT
NOTICE
AN APPLICATION
HAS BEEN MADE**

**AN APPLICATION HAS BEEN MADE IN THESE
PROCEEDINGS IN ADVANCE OF THE HEARING LISTED ON
19 MARCH 2025 AT THE HIGH COURT OF JUSTICE, KING'S
BENCH DIVISION, ROYAL COURTS OF JUSTICE, STRAND,
LONDON, WC2A 2LL**

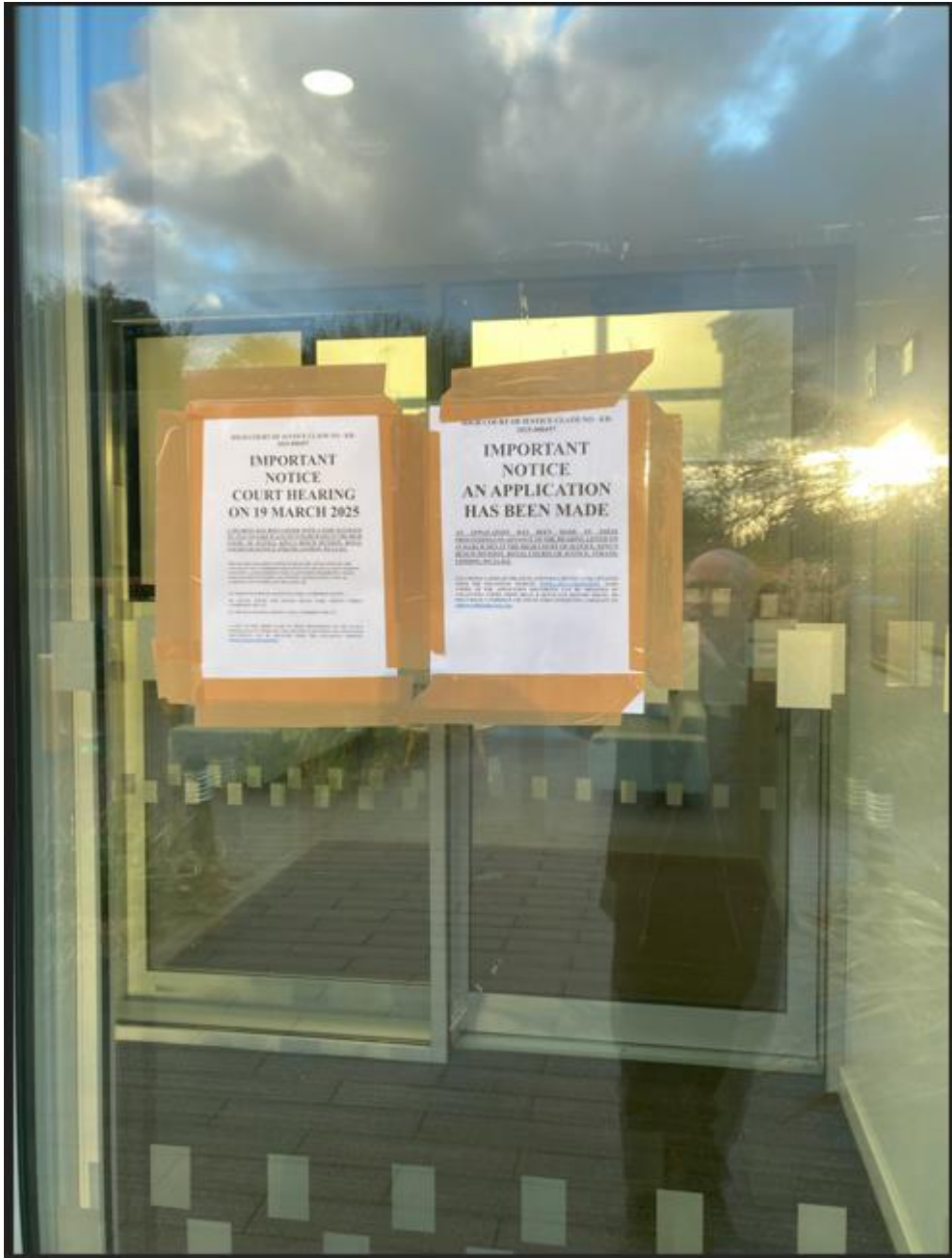
ELECTRONIC COPIES OF THE APPLICATION DOCUMENTS CAN BE OBTAINED FROM THE FOLLOWING WEBSITE: WWW.CAM.AC.UK/NOTICES. HARD COPIES OF THE APPLICATION DOCUMENTS CAN BE OBTAINED BY COLLECTING COPIES FROM MILLS & REEVE LLP, BOTANIC HOUSE, 100 HILLS ROAD, CAMBRIDGE CB2 1PH ON FIRST SUBMITTING A REQUEST TO millsreeve100@mills-reeve.com













Neutral Citation Number: [2025] EWHC 454 (KB)

Case No: KB-2025-000497

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand, London, WC2A 2LL

Thursday 27th February 2025

Before:
FORDHAM J

Between:	
THE CHANCELLOR, MASTERS AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE	<u>Claimant</u>
- and -	
PERSONS UNKNOWN	<u>Defendants</u>
- and -	
EUROPEAN LEGAL SUPPORT CENTRE	<u>Intervener</u>

Yaaser Vanderman (instructed by Mills & Reeve) for the **Claimant**
Grant Kynaston (instructed by ELSC) for the **Intervener**
The Defendants did not appear and were not represented

Hearing date: 27.2.25

Judgment as delivered in open court at the hearing

Approved Judgment

FORDHAM J

Note: This judgment was produced and approved by the Judge, after authorising the use by the Court of voice-recognition software during an ex tempore judgment.

FORDHAM J :Introduction

1. I am going to give my reasons now, for a decision on the Claimant's ("the University") application for an injunction. In other circumstances the Court would have wanted, and preferred, to have the opportunity to reserve judgment and hand down the judgment at a future date. But I am satisfied that I must grasp the nettle now, to explain what I am going to do in this case and why, in particular in the light of points that have been made about the significance of the coming weekend. I am authorising the use by the Court of voice recognition software, in the hope that it will enable me to produce a prompt and approved written judgment. But I should make clear that I expect the University's lawyers to be taking a note of this judgment with a view to it being uploaded to their injunction webpage.

The Injunction Webpage

2. The injunction webpage can be located by Googling "Cambridge University notices injunction". The actual address is www.cam.ac.uk/notices. The webpage is, in my judgment, important. By locating it, any member of the public or press and any person with an interest in this case is able to access all of the court materials in their entirety. I will be expecting, and may need to direct, that the University continue to upload to that webpage all court materials. Anyone accessing those materials will have full information about the background to this case and the evidence and written submissions that were put forward to the Court. Because the materials are publicly accessible, I will give some bundle references.

Two Cases

3. Since the University's bundle of authorities for today's hearing is itself available on the injunction webpage, there is ready access for everyone to the voluminous caselaw that was put before the Court. I think it is sufficient, for now, if I identify two of the cases. The first is a working illustration case which lists and addresses "substantive requirements" (see §23) and "procedural requirements" (§40): see University of London v Harvie-Clark and Others [2024] EWHC 2895 (Ch). That is a judgment in which an interim injunction was granted by the High Court. It is right to record that the defendants were unrepresented in that case. I am told that there is a contested substantive hearing in those proceedings, waiting to be dealt with. My principal purpose in referencing that case at the outset is because it gathers together relevant "requirements". The second is Wolverhampton City Council v London Gypsies and Travellers [2023] UKSC 47 [2024] AC 983. Unlike the University of London case, and unlike the present case, Wolverhampton was not a protest case. But reliance has been placed on it in the submissions today. And, while bearing in mind the distinction with protest cases, it contains what is self-evidently important substantive and procedural guidance.

The University's Application

4. The Court has before it the University's claim for an injunction, brought by claim form supported by particulars of claim. Specifically for today, and filed to accompany the claim form, is the University's Form N244 application notice dated 12 February 2025.

By that application notice, the University is asking the Court to make an order, in the terms of a draft order, for an injunction. The basis – given in the Form N244 – is that:

the Defendants have previously trespassed on part or all of the Land (as defined) and there is a substantial, real and imminent risk that those Defendants will trespass upon parts or all of the Land.

Mr Vanderman for the University has clarified, through his written and oral submissions, that today's application is not, however, solely based on trespass. It is also based on private nuisance.

The ELSC's Application

5. The other application which is before the Court – and which I have already in part granted – is a Form N244 application by the European Legal Support Centre (“ELSC”). ELSC seeks two things. The first is an order pursuant to CPR 19.2 that it be added to these proceedings as an intervener party. Reliance has been placed by Mr Kynaston, in support of that part of the application, on passages in Wolverhampton (especially at §§176 and 226) recognising the appropriateness of hearing from persons who represent the interests of defendants. Reliance is also placed on the fact that there was such an intervener in the Wolverhampton case itself. That first part of the ELSC's application has not been opposed by the University and I granted it earlier during today's hearing. I was quite satisfied that it was appropriate and necessary in the interests of justice that ELSC be joined to these proceedings. I will need to return to the substance of the second part of ELSC's application, which asked the Court to adjourn the University's claim for an injunction, in its entirety.

University Rules, Codes and Guidance

6. I want next to draw attention to the fact that – as in the University of London case (see §§9, 15, 23) – so too in the present case there are terms of admission, rules of behaviour, codes of practice and guidance which expressly address the position of a University student so far as concerns matters relating to events on University property, and freedom of expression and protest. These are themselves in the public domain. But they are also within the bundle of materials, available on the injunction webpage. By way of an overview, a student at the University is required to comply with the rules of behaviour and in turn with relevant codes of practice. Under the rules, a student must not interfere with – or attempt to interfere with – the activities of the University or occupy any University property without appropriate permission. Permission is required for meetings and events on University property, whether indoors or outdoors. Students are not to occupy buildings; nor to disrupt University events. They are not to seek to disrupt events taking place on University premises or do anything designed to prevent an event successfully taking place. Within the interim injunction order that was made in the University of London case (see §15) was express recognition that UOL students were able to protest if they had the relevant authorisation pursuant to the conduct rules codes and guidance.

A Final Injunction

7. The University's primary position at today's hearing is that this Court should today grant a “final” injunction, subject only to there being liberty to apply to vary or discharge it.

Four Locations

8. The injunction sought by the University would relate to four locations. The Court has been shown the land ownership materials which support the University's position that it is the landowner. First, there is the Senate House. This is a formal building in the centre of Cambridge, at the heart of the University, where degree ceremonies and Senate meetings are held. Secondly, there is the Senate House Yard. This is a lawn in front of the Senate House. Thirdly, there is a building called the Old Schools. It is on the same enclosed site as the Senate House and Yard. But is described as "physically distinct". It contains University administrative departments. Finally, there is a building called Greenwich House. It is an administrative building two miles away from the others.

The Description of Persons Unknown

9. The injunction that is sought is directed against what are described as persons unknown, as follows:

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.

For the purposes of the Court dealing with the application today, the University through Mr Vanderman has accepted the appropriateness of narrowing down "block, prevent, slow down, obstruct or otherwise interfere with access", so that it would simply say "prevent access".

The Three Prohibitions

10. The substance of the order being sought against that identified group of Persons Unknown involves three things. They are reflected in the description of the group, quoted above. The first is a prohibition on entering, occupying or remaining upon the land without the University's "consent". The second is a prohibition on (what I just explained is for today) preventing access on the part of any other individual to the relevant land, again without the University's "consent". Pausing there, one of the significant points about that second prohibition is that it would bite on actions taken by an individual who was not on the specified University land itself, but was on the land outside it. The third is a prohibition on erecting or placing any structure on the land including tents or sleeping equipment, again without the University's "consent".

Protesting and Other Locations

11. The University's particulars of claim specifically include this as part of the University's pleaded case:

The Defendants are able to protest at other locations without causing significant disruption to the University, its staff and students.

That is a clear, pleaded reference to “protest”. However, as Mr Kynaston for ELSC points out “protest” does not appear within the drafting of the University’s draft injunction order.

Five Years

12. Completing my description of the order that I am being asked by the University to make today, the injunction sought – in relation to these four locations and with these three categories of prohibition – would be for a period of 5 years (to 12 February 2030), but subject to an annual review and a liberty to apply provision.

Three Incidents of Occupation

13. So far as the factual basis for the University’s application is concerned, it really comes to this. The University has put forward evidence of three incidents each described in the materials as an “occupation”. The University explains that its understanding is that these have been occupations, predominantly by its own students. Two of them (at Senate House Yard) relate to the location for a planned graduation ceremony (Senate House) and, on the evidence, the occupation led to those graduation ceremonies being relocated. I emphasise I am not making any finding of fact for the purposes of today’s application. But I do need to consider and assess the evidential picture as it stands before the Court.
14. On 15 May 2024 – it is said – 40 to 50 people entered Senate House Yard by climbing over the fence. They made an “encampment” of 13 tents on the lawn. I understand 15 May 2024 to have been a Thursday. Graduation ceremonies were due to take place at Senate House during the course of the weekend (17 and 18 May 2024). There are social media postings which refer to the encampment, with photos. There is a reference to this as action “disrupting graduation” (University’s bundle p.600). The occupiers left at 10:20pm on the Friday evening (16 May 2024), by which time the location of the graduations had been moved from Senate House, to take place instead within individual colleges. There were 1,158 students graduating and 2,773 guests.
15. The other occupation relating to a graduation started on 27 November 2024 when – it is said – a group entered Senate House Yard again by climbing over the fence and 6 tents were put on the lawn. Again there are social media communications which are before the Court with the description of a returning occupation (“Cambridge encampment is back”; “we are back”) (pp.133, 401). I understand 27 November 2024 to have been a Wednesday. A graduation was due to take place at the Senate House that weekend, on Saturday 30 November 2024. That graduation was moved from Senate House across the road to Great St Mary’s Church. There were some 500 students affected and their guests. Communications – linked to those in occupation – refer to having “forced” the move of the graduation ceremony (p.153). The occupants again left, this time on the evening of Saturday 30 November 2024. At 11 am on that same day (30 November) there was a rally outside Great St Mary’s Church (p.566). Great St Mary’s Church – as I have already indicated – is across the road from Senate House and Senate House Yard. Mr Vanderman emphasises that, on the day that the occupants left (30 November 2024), there was a contemporaneous posted message that says: “We will be back” (p.153).
16. The third occupation is an incident of a very different nature, on the face of it. At Greenwich House (the administrative office building) on 22 November 2024 – it is said – a group entered the building; the fire alarms were activated and all the staff exited the

building; at which point the group then blocked re-entry. The University's evidence is that members of that group then accessed private offices and opened locked cabinets. That occupation continued until 6 December 2024. There were legal proceedings relating to that incident, specifically relating to what was said by the University to be confidential materials which the University was concerned had been accessed. Court orders were made relating to that.

17. That completes my summary of the background and context in which I have to decide what, if any, order it is appropriate for the Court to make today. I need next to record that I was particularly concerned during the hearing about two features of this case

A Concern About Timing

18. The first concern is that the University publicised these proceedings through its injunction webpage only on Wednesday 19 February 2025. Emails were sent on that morning to three identified email addresses. Notices were fixed by process servers at the four locations. The court documents were all published on the injunction webpage. That timing, in my judgment, is a matter of significant concern in the following context and for the following reasons:

- i) I have already identified the dates of the incidents which really underpin the application for an injunction. As I have already described, the latest of them (Greenwich House) had ended on 6 December 2024. It was well known and understood that the graduation ceremonies were scheduled to take place at Senate House on 1 March 2025, 29 March 2025 and 5 April 2025.
- ii) A published statement by the University on 3 February 2025 (p.261) referred to graduation ceremonies. It said the University was:

currently exploring legal options that would protect certain limited areas of the University, including Senate House and Senate House Yard, from future occupations so that we can hold the [graduation ceremonies] that our students and their families expect.

Two days later (5 February 2025) there was a meeting with representatives of Cambridge for Palestine. A final decision was then taken on the 7 February 2025 to issue these proceedings. But that was not announced publicly.

- iii) These proceedings were commenced on 12 February 2025 and an oral hearing was sought (in Form N244) at that stage, for the "week commencing 24 February 2025". The principal witness statement relied on (Rampton 1) is dated Friday 14 February 2025. It refers (§161) to proposed notification, by the means that were subsequently adopted. It was on that Friday 14 February 2025 (at 1736) that the Court confirmed to the University the listing of this hearing for today (27 February 2025).
19. In my judgment, it is regrettable that publication of the fact of these proceedings and the Court documents, including uploading to the webpage and sending of the three emails, did not take place until the morning of Wednesday 19 February 2025. That left just 5 working days before the hearing. It is no answer, in my judgment, that CPR 23.7(1)(b) refers to serving an application "at least 3 days" before the court is going to deal with it. That is because CPR 23.7(1)(a) has a freestanding requirement "as soon as practicable" after an application has been filed. The University was not waiting for an order from the

Court to direct or authorise any particular notification step. It had already waited a considerable period of time since the latest of the events most directly relied on.

20. All of this really matters, for reasons identified by the Supreme Court in the Wolverhampton case. At §226 the Supreme Court emphasised the importance of notification in sufficient time before an application is heard to allow affected persons – or those representing their interests – to make focused submissions as to whether it is appropriate for an injunction to be granted and if so as to terms and conditions (ie. including drafting). The Supreme Court also identified (at §226) why that was important, namely that it was “in the interests of procedural fairness”. I am unable to accept that the University’s delay is justifiable on the basis that (until it had a hearing date) it was “avoiding confusion”; or that it needed to “ready itself for press attention”; or that it needed to await the actions of a process server. In my judgment there ought to have been earlier and more prompt action, and therefore greater notice.

Reaction

21. In the event, ELSC became aware of the University’s application only on Friday 21 February 2025. Others have also, belatedly, become aware of these proceedings. The Court has – and I will require to be uploaded to the injunction webpage – a communication written to the University by the United Nations Special Rapporteur on Freedom of Association and Peaceful Assembly (Gina Romero), dated today 27 February 2025. There is also a letter to the Court from the non-governmental organisation Liberty, dated 26 February 2025. In addition, among the materials filed by ELSC and by the University there are other responses to the University’s application for the injunction. A series of concerns are raised in these materials.

The Other Graduation Events

22. The second point which caused me specific concern in dealing with the hearing today relates to the facts, so far as graduation ceremonies are concerned. The Court was told in the materials about the 17/18 May 2024 graduation weekend; and then about the 30 November 2024 graduation weekend. The Court was also told about the upcoming graduation events, beginning this Saturday 1 March 2025, then 29 March 2025 and then 5 April 2025. What the Court was not told in the materials was about these further ten graduation ceremonies which had taken place, unimpeded, at the Senate House and Senate House Yard. They were on 19 June 2024, 26 to 29 June 2024, 18 to 20 July 2024, and 25 and 26 October 2024. In my judgment, it was important that the Court was given a full factual picture, and not simply told about those graduation events that had been displaced. It was fortunate that, by specifically enquiring, I was able – through Mr Vanderman – to discover the fuller facts (also evidently unknown to him). This does mean that the picture before the Court is that it is three out of the last thirteen graduation events which have involved a need to relocate in the light of occupation action.

What I am Not Going to Do

23. I am not prepared today to make any “final” order for an injunction. I am not going to make any order with a duration of “five years”. Nor am I prepared today to make an order relating to all four of the locations that have been identified in the Claimant application. So far as the Old Schools are concerned, this building does not feature in any of the evidenced prior incidents. It is true that they are at the same enclosed site as

the Senate House and Senate House Yard. But I am very clearly told that they are “physically distinct”. So far as Greenwich House is concerned that, as I have said, is two miles away from graduation events. It has been the subject of one enduring incident which ended on 6 December last year. I am not satisfied that it could be appropriate, procedurally or substantively – still less necessary and justified – for this Court to be making any order today in relation to any of these features or locations.

24. Nor am I prepared today to make any order that would apply to the conduct of any individual who is outside of University land. In my judgment, that is a distinct feature. It relates to the second of the three prohibitions. It introduces distinct and important considerations. When I enquired about that, I was taken to footnoted references (authorities bundle p.543 fn.9) to a line of authorities that are not before the Court today. And I have not been satisfied, either from a procedural or a substantive point of view, that any injunction – even an interim injunction – should be made extending to what any individual does or does not do outside University land.

Saturday’s Graduation Ceremony

25. In my judgment, the clear focus for the purposes of today – in the light of everything that I have so far said – has to be on this Saturday’s graduation ceremony, scheduled as it is to take place at Senate House and Senate House Yard. Mr Kynaston for ELSC very fairly accepted that all of his points about timing and procedural unfairness were subject to the caveat that the Court would need to consider – as I do - the question of urgency. It is because the graduation ceremony is due to take place on Saturday – the day after tomorrow – that I am giving this judgment immediately at the end of the hearing. The supporting witness statement (Rampton 1 §74) describes as the “main issue” caused by the previous occupations, the disruption of degree graduation ceremonies at Senate House. The University’s solicitors letter of response (26 February 2025) to ELSC’s request for an adjournment today emphasises “urgency” by reference to Saturday’s ceremony. I agree with Mr Kynaston that it is striking, in all the circumstances, that the University did not narrow down and tailor today’s application and an injunction to Saturday’s degree ceremony. I am quite satisfied that it is the appropriate focus for my consideration. It is, moreover, an event which – on the face of it – squarely engages the University rules, codes and guidance to which I have referred, especially about students not interfering with University events, as well as about not having protest events without having applied for authorisation.

What I Am Going to Do

26. I am going to make a very limited court order in this case. I do not accept Mr Kynaston’s submission that there are “insurmountable drafting problems” in the University’s draft order, which it is simply too late to resolve or which the Court ought not to be concerned to address. I will be seeking with Mr Vanderman’s assistance and (if he is able to give it) Mr Kynaston’s assistance, to achieve maximum focus and clarity. Far from being a “final” order, for “five years”, my order will be a strictly time-limited order, covering the coming weekend only, and by way of “interim” injunction. It will relate only to conduct on the University land at Senate House Yard and within the Senate House building. It will relate only to persons being at those locations without the University’s consent (the first prohibition) and the erecting or leaving at those locations of equipment (the third prohibition). It follows – there being no second prohibition – that the rally which is scheduled to take place on Saturday opposite Senate House and Senate House Yard will

not be and cannot be affected by this Court's order today. I am satisfied that my order is a very limited, but a necessary, intrusion into any legitimate interests. One of the key points raised on behalf of ELSC – in Ms Ost's witness statement (at §28) – is that there is no evidence that anyone threatens or intends to take any action to interfere with Saturday's ceremony. I will return to that point. But I say now that, if that were correct, the order which I am making is benign. I will require from the University the usual cross-undertaking in damages that has been put forward.

Description of Persons Unknown

27. I am minded, in line with the approach of Nicklin J in MBR Acres Ltd v Curtin [2025] EWHC 331 (KB) especially at §§356 and 390, to adopt a simplified description of the Defendant. I have well in mind the clear guidance in Wolverhampton at §221 about defining actual or intended respondents to injunction applications “as precisely as possible”, “when it is possible to do so”. That guidance describes the appropriateness of exploring that identification, if necessary by reference to intention, and adopting it “if possible”. I am conscious that the order that I am making today is only, in any event, very limited and targeted, including for a very short period of what would be a couple of days. I will return with the parties' assistance to the drafting and finalisation of the order in this respect. One of the points that concerns me is as to the messaging that a court order may give, in the way in which it is expressed and targeted. In fact, in this case, even on the University's own drafting the order would not be limited to individuals or groups with any particular position or point of view in relation to “the Palestine-Israel conflict”. That is because the University's suggested drafting includes any “purpose connected with” the conflict. That is notwithstanding, as Mr Vanderman rightly points out, the University has needed to justify its application by reference to evidence; and the evidence in question has related to the occupation incidents which I have summarised.

Observations from UOL

28. I record here the following observations made in the University of London case by Thompsell J at §50:

whilst the rights and wrongs of the matters over which the protestors are protesting is a much bigger topic than the one before the court, and it would not be right for the court to express any opinion on them, I think I can observe that the motivations of the protestors spring from a deeply-held sense of injustice and it is a good thing that young people do take notice and seek to call out what they see as injustice. As noted in City of London Corp v Samede [2012] PTSR 1624 at §41 the court can take into account the general character of the view that Convention is being invoked to protect.

Human Rights

29. The “Convention” referred to by Thompsell J is the European Convention on Human Rights. I would not have been prepared in this case to proceed for today on the basis that those human rights were irrelevant to an application of this kind. There is authority in the possession case of University of Birmingham v Persons Unknown [2024] EWHC 1770 (KB) at §§62 to 64, where this Court (Johnson J) was not prepared to proceed by treating them as irrelevant, going on to explain that in that case possession on behalf of the University was plainly not a violation of Convention rights (see §§72-75). Wisely, Mr Vanderman – for the purposes of today – was prepared to accept that the Court should assume that the Convention rights could apply. I am not reaching a finding as to the law.

I am simply avoiding making an adverse assumption (whether about the Convention rights directly, or about substantively equivalent standards). Apart from anything else, as it presently seems to me, the Convention rights would be engaged in relation to any injunction which took effect under the second prohibition, on conduct outside the University's premises; even if they arose only from the perspective of this Court itself acting as a public authority.

Contempt and Permission

30. I will want to include in my order, in the particular circumstances of the present case, the special provision that the court's permission is required before any contempt application can be instituted: see MBR §390. I am told by Mr Vanderman that that is an unusual provision to include, but I am undeterred by that observation. Given, in particular, the procedural concerns that I identified earlier – but in any event in the particular circumstances – I am satisfied that additional protection is appropriate in this case.

Justification

31. It is obvious from what I have said already that I have been satisfied, by reference to the evidential burden which is on the University, that there is the requisite justification for a court order but only the very narrow and limited order which I have identified. A helpful encapsulation of the key substantive test was identified for me by Mr Vanderman – and embraced by him for the purposes of my consideration today – from the local authority gypsy and traveller context in Wolverhampton at §218:

any [claimant] applying for an injunction against persons unknown, including newcomers ... must satisfy the court by full and detailed evidence that there is a compelling justification for the order sought... There must be a strong probability that a tort ... is to be committed and that this will cause real harm. Further, the threat must be real and imminent.

Doubtless there is much that can be said about the word “imminent”. I have, for the purposes of today, noted the observations of Julian Knowles J in London City Airport Ltd v Persons Unknown [2024] EWHC 2557 (KB) at §29, about “imminence” being the absence of prematurity. I interpose that no concept of “imminence” justifies the University's delay to which I earlier referred when expressing my first of two concerns.

32. On the evidence before the Court, there have on two occasions been incidents in which individuals have deliberately entered Senate House Yard in the days before a known scheduled graduation ceremony. They have erected tents on the lawn. They have remained until the University has been “forced” to transfer the graduation ceremony from Senate House to another location. At which point they have then left the site. There is no evidence of damage caused by them. They are expressly described as having occupied and left peaceably; and having left the site on each of the two occasions in “a tidy state”. Nevertheless, on the contemporaneous social media communications, the identifiable purpose of the actions was “disrupting” graduation, so its move of location was “forced”. I have anxiously considered the newly-disclosed fact that there are no fewer than 10 graduation events after May 2024 and before November 2024 when no such occupation took place. Nevertheless, the latest graduation event in time was the November 2024 graduation weekend, where the University was “forced” to move the event from its historic graduation venue to an alternative venue. Moreover, as I have mentioned, there is evidence of a communication from an individual involved in the November occupation – the most recent event – which said: “we will be back”. All of this is the evidential

picture which, in my judgment, does satisfy the relevant legal tests of justification, for the purposes of today's interim injunction relating to the coming weekend, so far as occupation of the lawn at Senate House Yard is concerned.

33. Alongside that evidential picture, Mr Vanderman is in my judgment right to draw attention to the fact that there has been an opportunity – not taken by them – for those who were involved in communicating about the previous occupations to have disavowed any intention, so far as this Saturday is concerned. On that point, my attention was invited to the observations of Linden J in Esso Petroleum Co Ltd v Persons Unknown [2023] EWHC 1837 (KB) at §67. A principal point made in the helpful witness statement of Ms Ost of ELSC involved bringing to the Court's attention that Cambridge for Palestine has announced its intention to have a rally this Saturday at Great St Mary's, opposite Senate House. What she has taken from that information – which I respect and understand – is that this rally would be action “instead of” any protest or occupation at Senate House or Senate House Yard. On the evidence, however, there was a rally at 1pm on 30 November 2024 outside Great St Mary's, on the same day that the occupation at Senate House Yard was still taking place. I am not able, for the purposes of today, to take reassurance from the fact of the rally having been announced. Nor is there any reassurance in my judgment to be gained by the absence of prior communications of an intention to occupy ahead of this weekend. There is similarly no evidence that the previous occupations were preceded by visible communications which would have alerted anyone. Therefore the fact that there are no visible communications as at today is not something on which I am able to rely. As I have already mentioned – although it is really only a footnote – if and insofar as there is in fact no intention to occupy on this occasion, well then my Order is benign.
34. Alongside these points about the evidence of the risk there is the powerful evidence filed by the University, describing the impact for those for whom this is their graduation ceremony, and for their guests. That is the impact of a relocation to an alternative venue which, on the face of the evidence, would mean an event and location of a very different character. There is, in my judgment, powerful evidence – within the supporting witness evidence which can be viewed in the public domain on the injunction webpage – about these impacts and the impacts on the University itself and its staff. Against those impacts, I cannot see that there is any countervailing justification – still less compelling justification – which would extend to disrupting that graduation event by forcing it to again to be moved.
35. I have found a useful reference-point within the Statement from the UN Special Rapporteur on the Rights of Freedom of Peaceful Assembly and of Association, in her statement (2 October 2024) with recommendations for universities worldwide:

In universities located on private property, gatherings and peaceful protests are still protected under the right to freedom of peaceful assembly. While certain restrictions may be applied to safeguard the rights and interests of others property stakeholders, these must be assessed on a case-by-case basis. This evaluation should consider “whether the space is routinely publicly accessible, the nature and extent of the potential interference caused, whether those holding rights in the property approve of such use, whether the ownership of the space is contested through the gathering and whether participants have other reasonable means to achieve the purpose of the assembly, in accordance with the sight and sound principle”. This underscores the importance of refraining from imposing blanket restrictions. The use of “trespassing” offences for peaceful assemblies carried out on the private property of academic institutions should be assessed strictly against the necessity and proportionality principles...

I am quite satisfied, that viewed through the lens of those considerations, there is no countervailing feature within them which militates against the grant of this order. On the contrary, that case-specific evaluation in the light of those considerations in my judgment supports the court making the narrow order which I am now going to make.

36. I have not in these reasons gone through the “substantive requirements” and “procedural requirements” described in the two authorities which I mentioned at the start of this judgment. I record that I am satisfied that there is a cause of action in trespass, which matches the particulars of claim; that – subject to the second concern which I raised which was cured at this hearing – there has been full and frank disclosure; that the evidence is sufficient to prove the claim for the purposes of an interim injunction; and that the balance of convenience and justice weighs in my judgment strongly in favour of the grant, as opposed to the refusal, of my narrow order for interim relief in all the circumstances. Damages would not be an adequate remedy for the harm on the part of the University and those affected. Nor is there an adequate alternative remedy for the University which would, with sufficient urgency, be able to address an occupation and ensure that this weekend’s event did not again need to be relocated. I am satisfied that clarity can be achieved as to the “who”, the “what”, the “where” and the “when” of my order. I am satisfied that there has been sufficient notification, for the purposes of justly determining this application today, to the limited extent that I have. I am satisfied that my Order involves no procedural unfairness. I will make directions so that this case can return to this Court, at which point there can be full representation on the part of the Intervener and the court will be able to revisit the question of an injunction, including any question of another temporally-limited injunction relating to the next graduation ceremony scheduled for 29 March 2025. But I am not prepared, in the circumstances that I have described, to make any wider or further injunction order: I do not consider there to be a compelling justification or imminent risk justifying any further or other order; nor am I satisfied that it would be procedurally fair for this Court today to be making any wider or further order.
37. There is a final point which I should address explicitly. I was at one point minded to restrict today’s Order so that it applied only to Senate House Yard. The reason being that that is the location where there has previously been occupation. I have seen no evidence of any previous entry into Senate House itself. However I was satisfied on reflection that it was appropriate to include Senate House within the Order. It is the location of the ceremony. It would be an odd thing for the Court to restrict the injunction to the Yard. It might also be misunderstood, if the Court were to communicate that it is only the Yard. Moreover, I have been influenced by the other events at Greenwich House. I can see the prospect that those intent on securing a relocation of Saturday’s event, if feeling unable to locate themselves on the lawn at the Senate House Yard, could then see as open to them from the Court the alternative of securing entry – perhaps while preparations are underway for the ceremony – into the venue itself; and then being able to disrupt through occupation from within Senate House itself. And so it is, in my judgment, necessary, justified and appropriate in all the circumstances that Senate House should itself be included within the court order.

The Order

38. The Order itself will be promptly uploaded to the injunction webpage, where it can be viewed. There are directions in the Order for uploading of materials. The Defendants in the Order are simply “Persons Unknown”. The two prohibitions are that until 23:00 on

Saturday 1 March 2025, the Defendants must not, without the consent of the Claimant: (1) enter, occupy or remain upon the Land; or (2) erect or place any structure (including, for example, tents or other sleeping equipment) on the Land. The Land is Senate House and Senate House Yard. The return date for further consideration of the case will be the first available date after 17 March 2025. The parties will now need to liaise and provide a prompt time estimate. As I mentioned at the hearing, consideration should be given to a possible hybrid hearing which may serve to allow remote observation by those interested or affected unable readily to attend in person in London.



IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION
Before Mr Justice Fordham
On 27 February 2025

CLAIM NO: KB-2025-000497

BETWEEN:-

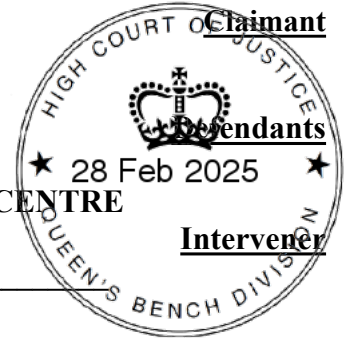
**CHANCELLOR, MASTERS AND SCHOLARS
OF THE UNIVERSITY OF CAMBRIDGE**

- v -

PERSONS UNKNOWN

- and -

THE EUROPEAN LEGAL SUPPORT CENTRE



ORDER

KB-2025-000497

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

**IMPORTANT NOTICE TO THE DEFENDANTS
AND PERSONS UNKNOWN**

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimant's claim by Claim Form, dated 12 February 2025, and its application for a final injunction, dated 12 February 2025

AND UPON hearing the Claimant's application for a final injunction, dated 12 February 2025, and reading the supporting evidence

AND UPON hearing the application by the Intervener dated 26 February 2025 to be joined as an Intervener and for an adjournment of the Claimant's application for an injunction

AND UPON hearing Counsel for the Claimant and Counsel for the Intervener on 27 February 2025



AND UPON the Claimant giving and the Court accepting the undertaking set out in Schedule 2 to this Order

AND UPON the “Land” being defined as Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA as shown for identification edged red on the attached Plan 1 in Schedule 1

AND UPON “Defendants” being defined so as to include “Persons Unknown”

AND UPON the Court giving judgment [2024] EWHC 454 (KB)

AND UPON paragraphs 8 to 11 of this Order being pursuant to the guidance in Wolverhampton CC v London Gypsies & Travellers [2023] UKSC 47

IT IS ORDERED THAT:

INJUNCTION

1. Until 23:00 on Saturday 1 March 2025, the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon the Land.
2. Until 23:00 on Saturday 1 March 2025, the Defendants must not, without the consent of the Claimant, erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.
3. In respect of paragraphs 1-2, the Defendants must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

VARIATION

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR r.6.16, r.6.28 and r.81.4(2)(c).
8. The Claim Form, Application Notice and evidence in support will be notified to Persons Unknown by the Claimant carrying out each of the following steps: (1) Uploading a copy onto the following website: www.cam.ac.uk/notices. (2) Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above. (3) Affixing a notice at those locations marked with an “x” on Plan 1 and 2 (of the Plans accompanying the Claim and Application Notice) setting out where these documents can be found and obtained in hard copy.
9. This Order shall be notified to Persons Unknown by the Claimant carrying out each of the following steps: (1) Uploading a copy of the Order onto the following



website: www.cam.ac.uk/notices. (2) Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order. (3) Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations on the edge of the Land marked with an “x” on Plan 1. (4) Affixing warning notices of A4 size at those locations on the edge of the Land marked with an “x” on Plan 1.

10. Notification to Persons Unknown of any further applications shall be effected by the Claimant carrying out each of the following steps: (1) Uploading a copy of the application onto the following website: www.cam.ac.uk/notices. (2) Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above. (3) Affixing a notice at those locations on the edge of the Land marked with an “x” on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.
11. Notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(1)-(2) only.
12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(3), 9(3)-(4) and 10(3), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

APPLICATION BY THE INTERVENER

14. The European Legal Support Centre is joined as an Intervener to these proceedings, pursuant to CPR r.19.2.

FURTHER DIRECTIONS

15. A return date in this matter to be listed for the first available date after 17 March 2025, at which hearing the Claimant’s application for an injunction dated 12 February 2025 can be further considered, to which extent the application stands adjourned by this Order.
16. The Claimant is to promptly upload all applications or written submissions made in these proceedings to www.cam.ac.uk/notices as well as the following documents: (1) The application notice filed by the European Legal Support Centre, dated 26 February 2025, together with the witness statement of Anna Ost, dated 26 February 2025 and the Skeleton Argument, dated 27 February 2025. (2) The letter sent by Liberty to the Court, dated 26 February 2025. (3) The email sent by the UN Special Rapporteur of Freedom of Assembly and Association for to the Claimant, dated 27 February 2025. (4) The Statement from the UN Special Rapporteur dated 2 October 2024. (5) The judgment of Fordham J [2024] EWHC 454 (KB).
17. Any contempt application against any Person Unknown may only be brought with the permission of the Court.
18. Liberty to apply.



19. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

20. The Claimant's solicitors and their contact details are: Mills & Reeve LLP, Botanic House, 100 Hills Rd, Cambridge, CB2 1PH. Ref: 0001200-1698. Email address: millsreeve100@mills-reeve.com.

Fordham J
DATED 27.2.25

BY ORDER OF THE COURT

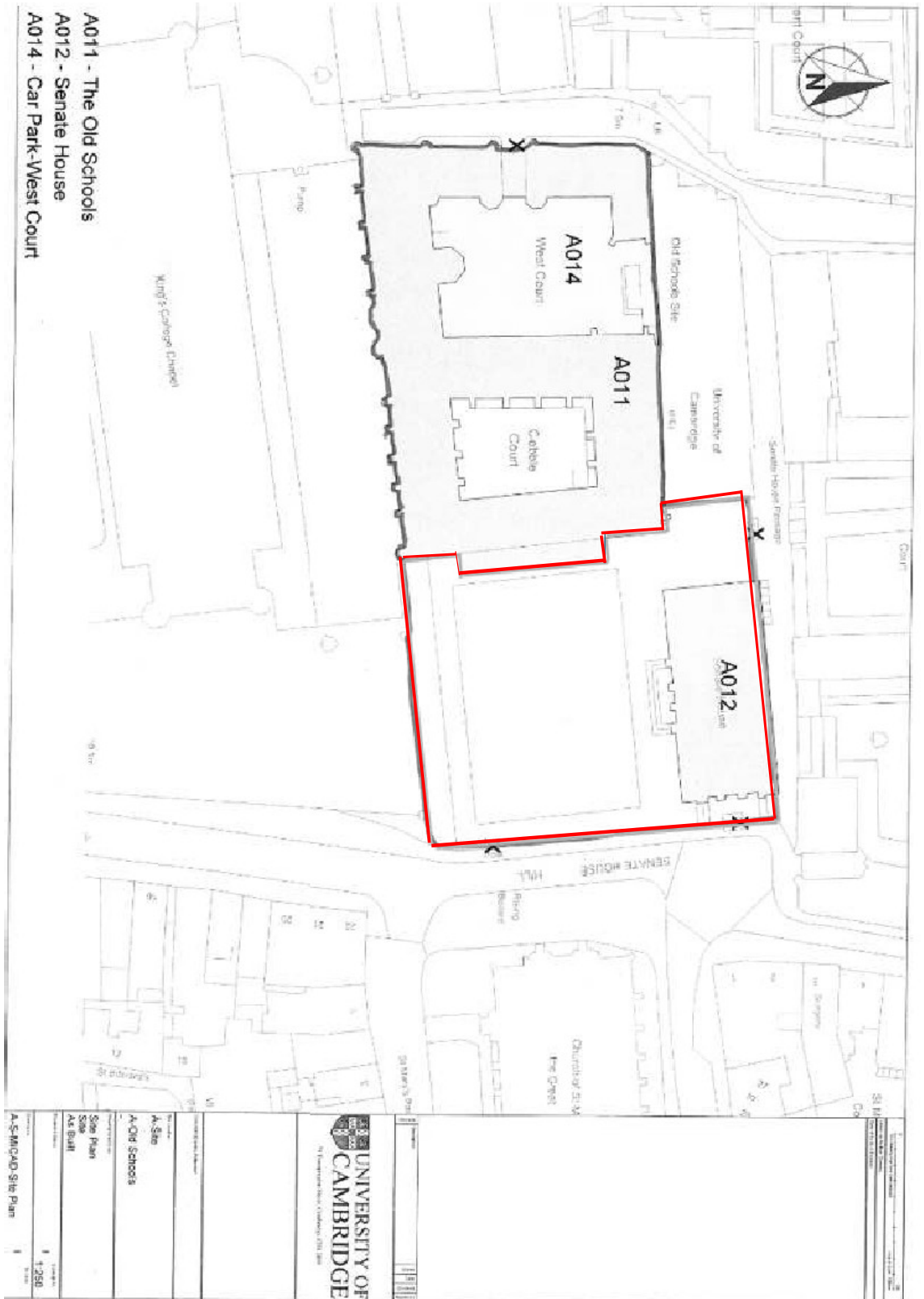
NOTE: This Order takes effect from the date on which it was made. A sealed copy is and will be available from the Court Office.

Dated: 27 February 2025

Schedules 1-3 follow:



SCHEDULE 1 – PLAN 1





SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANT

The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunctions in paragraphs 1-2 of this Order have caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- cambridge4palestine@proton.me
- encampmentnegotiations@proton.me
- bloodonyourhands@systemli.org

HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

IN THE MATTER OF AN APPLICATION FOR INJUNCTIVE RELIEF
BETWEEN:-

THE CHANCELLOR, MASTERS AND SCHOLARS
OF THE UNIVERSITY OF CAMBRIDGE

Claimant

- v -

PERSONS UNKNOWN AS DESCRIBED IN THE CLAIM FORM

Defendants

**SKELETON ARGUMENT
ON BEHALF OF THE CLAIMANT**

HEARING DATE: 27 FEBRUARY 2025

COUNSEL: YAASER VANDERMAN, BRICK COURT CHAMBERS (YAASER.VANDERMAN@BRICKCOURT.CO.UK)

ESSENTIAL READING (30 MINS):

- PARTICULARS OF CLAIM [HB1/9]
- FIRST WITNESS STATEMENT OF EMMA RAMPTON, DATED 14 FEBRUARY 2025 [HB2/41]
- FIRST WITNESS STATEMENT OF MARK PARKER, DATED 19 FEBRUARY 2025 [HB1/36]
- FIRST WITNESS STATEMENT OF SAMUEL MAW, DATED 24 FEBRUARY 2025
- DRAFT ORDER [HB1/25]

REFERENCE TO “**RAMPTON 1, §x [HB2/z]**” IS A REFERENCE TO PARAGRAPH X OF EMMA RAMPTON’S FIRST WITNESS STATEMENT, WHICH CAN BE FOUND AT PAGE Z OF HEARING BUNDLE 2. REFERENCE TO “**[AB/x/Y]**” IS A REFERENCE TO TAB X AND PAGE Y OF THE AUTHORITIES BUNDLE.

I. INTRODUCTION

1. The hearing on 27 February 2025 is the hearing of the Claimant’s (the “**University**”) application for injunctive relief to restrain threatened acts of trespass and nuisance by the Defendants (Persons Unknown) on two relatively small sites owned and occupied by the University (the “**Land**”).
2. The Defendants (or a number of them) form part of a well-organised group of individuals¹ – with strong and committed views on the Palestine-Israel conflict – who

¹ It is believed that they are a student-led group but the University cannot be sure whether all of those carrying out direct action are, in fact, students of the University.

appear to be affiliated with the group known as Cambridge for Palestine. The Cambridge for Palestine website states that *“We are a coalition standing against Cambridge University's complicity in the genocide of and apartheid against Palestinians.”* Their methods involve protests in the form of direct action aimed at the University.

3. In terms of direct action, the University seeks to prohibit the Defendants from carrying out the following acts, without its express consent, when done for the purpose of carrying out a protest, or taking part in any demonstration, public assembly or encampment: (1) entering, occupying or remaining upon the Land; (2) blocking, preventing, slowing down, obstructing or otherwise interfering with the access of any other individual to the Land; or, (3) erecting or placing any structure (including, for example, tents or other sleeping equipment) on the Land, (the **“Direct Action”**).
4. This claim is similar to the recent case of University of London v Persons Unknown [2024] EWHC 2895 (Ch) (25 November 2024), where injunctive relief was sought and obtained against student protestors taking direct action on related grounds [AB/14/407].
5. This application has been brought with some urgency in light of the graduation ceremonies due to take place at Senate House and Senate House Yard on Saturday 1 March 2025.

II. THE LAND

6. Plan A shows the general locations of the two sites sought to be protected by injunctive relief – the Land [HB1/6]. These are shown in more detail in Plan 1 and Plan 2 (edged red).
7. Plan 1 comprises [HB1/7]:
 - a. Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA. Together with The Old Schools, this is the ceremonial and administrative heart of the University. It is where degree ceremonies are held and is the official meeting place of the Regent House and of the Senate; and,

- b. The Old Schools, Trinity Lane, Cambridge, CB2 1TN. This is situated next to Senate House and Senate House Yard and, with them, forms one enclosed site (albeit that the Old Schools is physically distinct). It houses key University administrative departments.
8. The University is the freehold proprietor of these sites. Whilst currently unregistered, this land is pending first registration at Land Registry under title number CB489602. The University's long-standing ownership and possession of these historic sites is demonstrated by the statutory declaration of Richard Griffin, dated 3 September 2024 [HB2/105].
9. Plan 2 [HB1/8] shows Greenwich House, Madingley Rise, Cambridge, CB3 0TX. This is an administrative office building accommodating approximately 500 of the University's employees.
10. The University is the registered freehold proprietor of Greenwich House under title number CB337595 [HB2/86].
11. The position on access to the Land is set out in Rampton 1, §§15-27 [HB2/47], and photos can be seen at HB2/111-113.

III. NOTIFICATION

12. As the Defendants are Persons Unknown, notice of this application in the usual sense is not possible: Wolverhampton CC v London Gypsies & Travellers [2024] AC 983 ("Wolverhampton CC"), §§132, 139, 142, 167(ii), 176-177 [AB/6/127]. Rather, the University "*must take reasonable steps to draw the application to the attention of persons likely to be affected by the injunction sought or with some other genuine and proper interest in the application*": Wolverhampton CC, §226 [AB/6/202].
13. The University has done so by taking the following steps in relation to the Claim Form, Application Notice and evidence in support:
- a. Uploading copies onto the following website: www.cam.ac.uk/notices.

- b. Sending an email to the email addresses associated with the Defendants (cambridge4palestine@proton.me; encampmentnegotiations@proton.me; 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.

- c. Affixing a notice at those locations marked with an “x” on Plans 1 and 2 setting out where these documents can be found and obtained in hard copy.

14. These steps were completed on Wednesday 19 February 2025: First Witness Statement of Mark Parker, 19 February 2025 [HB1/36] and First Witness Statement of Samuel Maw, dated 24 February 2025.

15. As such, although the requirements in CPR r.23.7(1) and s.12(2)(a) Human Rights Act 1998 [AB/1/5] do not technically apply – on account of Persons Unknown not capable of being parties to proceedings – they have been complied with in spirit: see, e.g., London City Airport v Persons Unknown [2024] EWHC 2557 (KB), §5 (Julian Knowles J) [AB/13/397].

IV. THE CAMPAIGN

16. The background to the present dispute is set out in Rampton 1, §§28-59 [HB2/51] and summarised below.

(a) The Defendants

17. The Defendants are responsible for conducting a campaign of direct action against the University in relation to the Palestine-Israel conflict. Many of them appear to be affiliated with the group known as Cambridge for Palestine, whose stated aim (on its website “cambridge4palestine.org”) is as follows: “*We are a coalition standing against Cambridge University's complicity in the genocide of and apartheid against Palestinians.*” [HB1/6] As well as its website, Cambridge for Palestine also has an X account (formerly known as Twitter) (“@cam4palestine”), a Facebook account (“Cambridge for Palestine”) an Instagram account (“cambridgeforpalestine”) and a TikTok account

("cambridge4palestine"), on which they, e.g., organise events, publish their views and demands, and publicise the action they are taking.

18. On Instagram, Cambridge for Palestine has set out the following demands under the heading "*CAMBRIDGE ENCAMPMENT FOR PALESTINE: OUR DEMANDS*":

"We will not move until the University of Cambridge agrees to:

- 1 Disclose financial and professional ties with complicit organisations
- 2 Divest funds and collaboration away from such organisations
- 3 Reinvest in Palestinian students, academics, and scholars
- 4 Protect students at risk and become a university of sanctuary"

(b) Previous incidents of direct action

19. The Defendants have engaged in direct action on the Land on multiple occasions in the last year.
20. On 15 May 2024, 40-50 Defendants entered Senate House Yard by climbing a ladder over the perimeter fence. They set up an encampment with approximately 13 tents on Senate House Yard [HB2/601-603]. This was for the ostensible purpose of preventing graduation ceremonies taking place at Senate House on 17 and 18 May 2024 [HB2/600]. They departed at 10:20pm on 16 May 2024.
21. On 22 November 2024, a group of Defendants entered Greenwich House, activated the fire alarm and, once all staff had evacuated the building, blockaded the entrances and exits to prevent re-entry [HB2/370-373, 470-540]. During this time, the Defendants gained access to restricted areas of the building, opened locked cabinets and searched through them. Due to the confidential and commercially sensitive nature of the documents kept in Greenwich House, the University applied for and obtained an injunction on 16 December 2024 which, *inter alia*, prohibited the defendants from using, publishing or disclosing any documents or information obtained whilst in Greenwich House [HB2/154]. The Defendants departed on 6 December 2024.
22. On 27 November 2024, a group of Defendants entered Senate House Yard by climbing over the perimeter fence. They set up an encampment with approximately 6 tents on

Senate House Yard [HB2/401-404, 386-454, 584-592]. This was for the ostensible purpose of preventing graduation ceremonies taking place at Senate House on 30 November 2025 [HB2/567 and 580]. They departed on 30 November 2024.

(c) Statements made by the Defendants

23. As well as the incidents of direct action, the Defendants have made various statements demonstrating their continuing intention to carry out direct action.
24. On 27 November 2024, after resuming its encampment on Senate House Yard, Cambridge for Palestine declared that, *“our movement is left with no option other than principled escalation”, “long live the student intifada”* and stated that *“The Cambridge Liberated Zone has expanded and will continue to do so”* [HB2/133].
25. In further posts on 29 November 2024, Cambridge for Palestine stated that, *“Such unprecedented times require sustained escalation”* and *“As long as there are no universities left in Gaza, Cambridge will not know normalcy”* [HB2/148 and 150].
26. On 30 November 2024, after leaving Senate House Yard, Cambridge for Palestine posted, *“We will be back”*, under the tag line *“We Will Not Stop. We Will Not Rest”* [HB2/153]. They further stated:

“This end is a temporary one...Our encampment from last spring was only a beginning, and this one is not nearly an end. We will ensure that the University does not see normalcy until we see divestment and liberation.” [HB2/581]
27. On 5 December 2024, Cambridge for Palestine posted a response to the University’s statement, dated 3 December 2024, relating to the direct action at Senate House. Cambridge for Palestine stated, *“As students at this institution, we refuse to sit idly by as our University proudly kills. ‘Disruption’ of normalcy is the only ethical, moral choice”* [HB2/440].
28. On 8 December 2024, after ending their occupation of Greenwich House, Cambridge for Palestine stated that, *“our movement will remain steadfast until justice is achieved”* [HB2/447].

29. Moreover, in light of the ceasefire that was agreed between Israel and Hamas on 15 January 2025, Cambridge for Palestine has made various statements, including the following:

“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.” [on 18 January 2025] **[HB2/455]**

“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.” [on 21 January 2025] **[HB2/636]**

30. Further, Cambridge for Palestine endorsed the actions of Oxford Action for Palestine (a group which appears to have very similar aims to Cambridge for Palestine) when it occupied the Radcliffe Camera (library) in Oxford on 24 January 2025.

31. At no stage have the Defendants or Cambridge for Palestine disavowed an intention to carry out further direct action.

V. HARM TO THE UNIVERSITY

32. The harm to the University caused by the direct action was substantial and is set out in Rampton 1, §§60-83 and 153-160 **[HB2/57]**. In summary:

- a. Cancellation of graduation ceremonies at Senate House: the two occupations resulted in the disruption of graduations for 1,658 students and approximately 3,000 guests. Aside from the administrative difficulties in relocating these ceremonies, the University considers that there is a substantial harm suffered by graduands (and their families) when they are not able to graduate, as expected, in the historic and traditional setting of Senate House.
- b. Operational disruption: University staff were unable to work at Greenwich House between 22 November 2024 and 8 January 2025 and their relocation involved significant resource (approximately 500 staff work there although

the numbers working there each day will be lower due to hybrid working). On their return, staff had to carry out an audit of the documents within the building to establish whether they had been interfered with.

- c. Risk of disclosure of confidential and commercially sensitive information: the University has an annual turnover from research grants in excess of £500m. Its funding partners rely on the University 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, including the withdrawal of grant funding and reputational damage as a secure and professional research partner.
- d. Financial costs: including extra security, cleaning and legal costs (prior to this claim), as well as the costs of relocating graduations, the University has incurred costs in excess of £230,000.
- e. Health and safety: the blockading of entry and exit points in Greenwich House raised serious health and safety concerns, in particular relating to fire safety.

VI. RELEVANT LEGAL PRINCIPLES

- 33. The law in relation to Persons Unknown, who are newcomers (as in this case), has been resolved by the Supreme Court in Wolverhampton CC. Wolverhampton CC has now also been considered in detail in the protest context in a number of cases, in particular Valero Energy Ltd v Persons Unknown [2024] EWHC 134 (KB) ("Valero") [AB/7/207]. In Valero, Ritchie J set out a list of factors to be satisfied (albeit in the context of a summary judgment application). For a summary of the case law, see, generally, Y Vanderman, Manual on Protest Injunctions (v.2, 2024), §§5.1-5.9 [AB/17/565].
- 34. The High Court recently granted precautionary injunctive relief to a university prohibiting direct action by student protestors (including Persons Unknown): University of London v Persons Unknown [2024] EWHC 2895 (Ch) ("UoL"). In doing

so, Thompsell J applied the principles and tests set out in Wolverhampton CC and Valero: UoL, §§16-53 [AB/14/410].

35. Very recently, Nicklin J in MBR Acres Ltd v Curtin [2025] EWHC 331 (19 February 2025) (“**MBR Acres**”) adopted a novel approach to injunctions against Persons Unknown on the apparent authority of Wolverhampton CC. On the basis that these were truly *contra mundum* orders, he found that Persons Unknown did not need to be, and ought not to be, defined in any way: §§356 and 362 [AB/15/508]; and see the Order granted in that case, which would appear to prohibit *anyone* from going onto the relevant land, whether carrying out a protest or not, and even whether or not they have consent to be on the land [AB/16/526]. This approach has not been adopted in this claim as: (a) this method has not been used in at least 16 High Court cases decided since Wolverhampton CC (including UoL),² only one of which (Valero) appears to have been referred to in the judgment; and, (b) it would considerably expand the scope of the injunction to cover individuals who come onto the Land, even lawfully, without any intention of carrying out the Direct Action.

VII. SUBMISSIONS

36. The Valero tests, set out at §58 of Ritchie J’s judgment [AB/7/236], are satisfied here for the following reasons:³
37. **First**, there are two civil causes of action identified. In relation to trespass:

² Valero Energy Ltd v PU [2024] EWHC 134 (KB) (Ritchie J) (26 Jan 2024); Exolum Pipeline Systems Ltd v PU [2024] EWHC 1015 (Farbey J) (20 Feb 2024); 1 Leadenhall Group London v PU [2024] EWHC 854 (8 Mar 2024); HS2 v PU [2024] EWHC 1277 (Ritchie J) (24 May 2024); Jockey Club Racecourses Ltd v PU [2024] EWHC 1786 (Sir Anthony Mann) (9 Jul 2024); Leeds Bradford Airport Ltd v PU [2024] EWHC 2274 (Ritchie J) (18 Jul 2024); Manchester Airport v PU [2024] EWHC 2247 (HHJ Coe KC) (24 Jul 2024); Drax Power Ltd v PU [2024] EWHC 2224 (Ritchie J) (25 Jul 2024); Arla Foods v PU [2024] EWHC 1952 (Jonathan Hilliard KC) (26 Jul 2024); Tendring DC v PU [2024] EWHC 2237 (Ritchie J) (31 Jul 2024); N Warwickshire BC v PU [2024] EWHC 2254 (HHJ E Kelly) (6 Sep 2024); London City Airport Ltd v PU [2024] EWHC 2557 (Julian Knowles J) (11 Oct 2024); Thurrock Council v Adams [2024] EWHC 2576 (Julian Knowles J) (11 Oct 2024); Heathrow Airport Ltd v PU [2024] EWHC 2599 (Julian Knowles J) (14 Oct 2024); Shell UK Ltd v PU [2024] EWHC 3130 (Dexter Dias J) (5 Dec 2024); ; Teledyne UK Ltd v Gao [2024] EWHC 3538 (Bourne J) (20 Dec 2024); TfL v PU [2025] EWHC 55 (Morris J) (16 Jan 2025); Enfield LBC v PU [2025] EWHC 288 (Jason Beer KC) (12 Feb 2025).

³ See Y Vanderman, Manual on Protest Injunctions (v.2, 2024), §5.10.

- a. No member of the public has been granted a licence to be on the Land or carry out the Direct Action.
- b. In respect of students, Greenwich House, Senate House and The Old Schools are not open to them and they have no general licence to be there. Senate House Yard is generally open to them but only when the gates are open and there is no event taking place there. But in any event, students do not have a general licence to carry out protests on/occupy Senate House Yard. In particular, to do so without obtaining express consent under the University's Rules of Behaviour [HB2/230] and the University's Code of Practice of Freedom of Speech [HB2/248] amounts to a breach of the Rules of Behaviour, paragraphs 1(a), 1(d), 2(a) and 2(b), and paragraph A.3 of the Annex to the Code. These are rules which students signed up to when enrolling at the University. Consequently, any student entering onto the Land for the purposes of carrying out the Direct Action would have no licence to do so and would be a trespasser (see UoL, §23 [AB/14/411]).

In relation to nuisance, Direct Action on the Land would also amount to an undue and substantial interference with the University's enjoyment of the Land.

38. **Secondly**, the University has complied (and will continue to comply) with its duty of full and frank disclosure. This is considered further below.
39. **Thirdly**, there is sufficient evidence to prove the claim. There is a real and imminent risk of further Direct Action by the Defendants for the reasons set out at §§16-31 above and in Rampton 1, §§134-152 [HB2/73]. The evidence set out in Rampton 1, §§12-118 [HB2/46], regarding the nature of the Land, the University's interest in the Land, and the Defendants' previous actions and statements are more than sufficient evidence to prove the claim.
40. **Fourthly**, there is no realistic defence. The Defendants would be trespassers on land owned by the University. Human rights issues are considered below.

41. **Fifthly**, there is a compelling justification for the injunction. The University wishes to use its own land for important purposes and the Defendants are preventing it from doing so without any lawful right to do so. They are doing so not just at great cost and disruption to the University, its staff, graduating students and their guests, but also at risk to themselves. In light of the evidence in Rampton 1, §§137-145 [HB2/74], the University has no other practical means of restraining the Defendants from carrying out the Direct Action. The University has attempted to engage in dialogue with protestors but that did not put a stop to the Direct Action: Rampton 1, §§84-97 [HB2/61].
42. **Sixthly**, in terms of ECHR rights, the Defendants might seek to rely on Article 10/11 ECHR. Such an argument is bound to fail for the following reasons.
43. The Land is private land. For the purposes of the Human Rights Act 1998, the University is not a public authority or exercising public functions when seeking to use its own private land. Articles 10 and 11 ECHR include no right to trespass on private property and thereby override the rights of private landowners: London City Airport v Persons Unknown [2024] EWHC 2557 (KB), §8 (Julian Knowles J) [AB/13/398]; DPP v Cuciurean [2022] 3 WLR 446 (DC), §§40-50 [AB/14/33]; Y Vanderman, Manual on Protest Injunctions (v.2, 2024), §8.9 [AB/17/601].
44. Alternatively, any interference with Article 10/11 ECHR rights (by virtue of the sought injunction) would be justified in that:⁴
- a. It would be prescribed by law. It would be the result of a Court-ordered prohibition flowing from powers in s.37 of the Senior Courts Act 1981.

⁴ In a recent possession claim on similar facts, Johnson J proceeded (at the first hearing) on the basis that there was a real prospect of establishing that a University seeking a possession order could amount to the exercise of public functions: University of Birmingham v Ali [2024] EWHC 1770, §§50 and 60 [AB/8/257 and 260]. He, nevertheless, found that there was no real prospect of a successful ECHR claim as “*the severity of the impact on Ms Ali's rights does not (by a significant margin) come anywhere close to outweighing the importance of the objective of the University being able to regain possession of its own land.*”: §§74-75. A very similar approach was taken in QMUL v Persons Unknown [2024] EWHC 2386, §§40-59 (Deputy Master Henderson) [AB/12/358].

- b. It would be in pursuit of the legitimate aim of protecting the University's property rights as well as the rights and interests of third parties lawfully seeking to use the Land.
- c. The injunction sought is proportionate as: its aims are sufficiently important to justify any interference; there is a rational connection between the means chosen and the aims; and, there is a fair balance between the various rights at issue given (and see UoL, §36 [AB/14/414]):
- (1) The University only seeks relief in relation to two relatively small sites which have already been the subject of Direct Action.
 - (2) Direct action, by which the Defendants are seeking to compel others to act in a certain way, rather than persuade them, is not at the core of Article 10/11 ECHR rights: Esso Petroleum v Persons Unknown [2023] EWHC 1837 (KB), §57 (Linden J) [AB/5/122].
 - (3) Having breached the terms of their contract with the University and the Code, the Defendants have no licence or other right to carry out the Direct Action.
 - (4) The nature of the Direct Action is such as to exclude the use of the Land by the University and all others who have a lawful right to be there.
 - (5) The Defendants have now carried out Direct Action on the Land on three separate occasions at great disruption, and cost, to the University, the Colleges, staff, graduating students and the guests of students.
 - (6) There is limited connection between the Land and the substance of the Defendants' protest.

- (7) The Defendants are able to protest at other locations and through other methods without causing significant disruption to the University, its staff and students.
 - (8) There are no less restrictive or intrusive alternative means available to the University. These are for the reasons set out at **§41 above**.
45. **Seventhly**, damages are not an adequate remedy as: (1) significant elements of the harm – i.e. disrupted graduation ceremonies, damage to reputation, and health and safety concerns – are not realistically capable of being financially compensatable; and, (2) in any event, any financial loss could not be recovered from Persons Unknown: UoL, §38 [AB/14/414]; Valero, §70 [AB/7/242]. For the same reasons, the resulting harm would be “grave and irreparable”: Esso Petroleum v Persons Unknown [2023] EWHC 1837 (KB), at §§63-64 [AB/5/123].
46. **Eighthly**, the Persons Unknown are clearly and plainly identified by reference to the tortious conduct prohibited (trespass) and clearly defined geographical boundaries. It is not possible to identify the Persons Unknown as they have not yet carried out the threatened trespass, it is not known who may attempt to do so in the future and the University would not know their names if they did (as they would likely cover their faces).
47. **Ninthly**, the prohibition in the draft Order is set out in clear words. It does not prohibit any conduct which would be lawful on its own.
48. **Tenthly**, the prohibition in the draft Order mirrors the torts claimed.
49. **Eleventhly**, the prohibition in the draft Order is defined by clear geographic boundaries.
50. **Twelfthly**, the University seeks an injunction lasting 5 years (with an annual review). Given the longstanding nature of the conflict at the heart of the Defendants’ protests, it is considered this is reasonably necessary to protect the University’s legal rights. 5-year final injunctions (with annual reviews) have recently been granted in a variety of

Persons Unknown cases: see Y Vanderman, Manual on Protest Injunctions (v.2, 2024), §7.13 [AB/17/598] and, more recently, Arla Foods v Persons Unknown [2024] EWHC 1952 (Ch) [AB/9/265] and London City Airport v Persons Unknown [2024] EWHC 2557 (KB) [AB/13/395].

51. The University, therefore, effectively seeks final relief against Persons Unknown (newcomers) given that, in this context, there is no meaningful difference between interim and final injunctive relief: Wolverhampton CC, §§139, 143(vii), 178 and 234 [AB/6/127] and, more recently in the protest context, Drax Power Ltd v Persons Unknown [2024] EWHC 2224, §18 (Ritchie J) [AB/10/304]. Their procedural rights are maintained by, for example, their ability to apply, at any time, to set aside or vary the order: Wolverhampton CC, §§167(ii), 178 and 232.
52. **Thirteenthly**, the University has taken reasonable steps to draw the application to the attention of persons likely to be affected by the injunction sought or with some other genuine and proper interest in the application. The proposed steps for notification going forward are set out in the draft Order [HB1/28].
53. **Fourteenthly**, the draft Order includes provision for any person to apply to set aside or vary the injunction on short notice [HB1/27].
54. **Fifteenthly**, provision is made in the draft Order for any injunction to be reviewed by the Court on an annual basis [HB1/27].

VIII. CROSS-UNDERTAKING IN DAMAGES

55. The University is willing and able, if necessary, to provide a cross-undertaking in damages: Rampton 1, §§167-168 [HB2/83].

IX. FULL AND FRANK DISCLOSURE

56. The University believes it has complied with its duty of full and frank disclosure. In order to support compliance with its duty of full and frank disclosure, in this section the University sets out some arguments that could be made against its application for an injunction.

57. **First**, it could be argued that the Defendants no longer pose a real and imminent risk of carrying out the Direct Action because two students from the Cambridge for Palestine Task Force were re-invited to, and attended, the meeting of the University's Working Group on 5 February 2025: Rampton 1, §97 [HB2/64].
58. The University does not consider that this diminishes the real and imminent risk of Direct Action in the future. This is because:
- a. There has been no disavowal by Cambridge for Palestine of an intention to carry out the Direct Action on the Land. Its social media channels continue to make the demands as referred to above.
 - b. The University has no way of knowing whether the participation of the two students in the Working Group will impact the inclination of other Persons Unknown (who may or may not be connected with/members of Cambridge for Palestine) to carry out Direct Action on the Land.
 - c. In any event, the University is concerned that if, for whatever reason, the two students and Cambridge for Palestine Task Force subsequently become aggrieved with the work of the Working Group, just as before, Persons Unknown may decide to carry out Direct Action in order to put pressure on the University.
59. **Secondly**, it could be argued that the University has identified one individual who participated in the occupation of Greenwich House and ought to have joined this person as a named defendant. In response, the reason why the University has not joined this individual is because it has no evidence that the individual plans to carry out Direct Action on the Land in the future and that, on this basis, it would not be appropriate to single them out in these proceedings: Rampton 1, §133 [HB2/73]. This is the sort of approach taken by courts in the past: HS2 v Harewood [2022] EWHC 2457 (KB), §§32 and 35 of the "Appendices...Containing the Approved Transcripts of 4 decisions Made Extempore During the Hearings" [AB/4/75] and upheld by a majority in the Court of Appeal [2022] EWCA Civ 1519, §§37 and 42 [AB/4/98].

60. In any event, even if the Court takes the view that this individual ought to be joined to the proceedings, the University would still need to seek an injunction against Persons Unknown.
61. **Thirdly**, it could be argued that there are other ways of stopping the Direct Action, such as police involvement. However, the case law has repeatedly stated that the existence of the criminal law is no substitute for a claimant bringing its own civil claim: see, most recently, N Warwickshire BC v Persons Unknown [2024] EWHC 2254, §88 (HHJ Emma Kelly) [AB/11/336].
62. Further, Public Space Protection Orders under s.59 of the Anti-Social Behaviour, Crime and Policing Act 2014 are not available as the Direct Action is not being carried out in a “public place”, i.e. “any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission” (s.74(1)) [AB/2/10 and 12].
63. **Fourthly**, it could be argued that the approach to defining Persons Unknown in MBR Acres ought to be adopted. This has been dealt with above. Indeed, such an approach would appear to broaden drastically the scope of any order to cover unwitting members of the public.
64. Moreover, although it was said in MBR Acres, §390 [AB/15/515], that orders of this kind should provide for the Court’s permission to be obtained before a contempt application may be brought, the University’s view is that this is unnecessary. The bringing of trivial contempt applications does not appear to be a widespread problem in protest injunction cases.

X. CONCLUSION

65. For the reasons set out above, the Court is respectfully requested to grant an Order in the terms of the draft Order.

YAASER VANDERMAN

Brick Court Chambers

24 February 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: KB-2025-000497

BETWEEN:

THE CHANCELLOR, MASTERS AND
SCHOLARS OF THE UNIVERSITY OF
CAMBRIDGE

Claimant

- and -

PERSONS UNKNOWN AS DESCRIBED IN THE CLAIM FORM

Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Proposed Intervener

**SKELETON OF THE PROPOSED INTERVENER
FOR HEARING ON 27 FEBRUARY 2025**

Time estimate: 30 minutes

Pre-reading: The Proposed Intervener suggests pre-reading, if time permits: (i) Skeleton Arguments; and (ii) the First Witness Statement of Anna Ost (“Ost 1”)

Reading estimate: 15 minutes

References to {AB/page} are to the Claimant's Authorities Bundle, and {HB/page} to the Claimant's Hearing Bundle.

A. INTRODUCTION

1. This is the skeleton argument of the Proposed Intervener (“ELSC”) for the hearing of its applications dated 26 February 2025 for (i) joinder as an intervener; and (ii) adjournment of the hearing of the Claimant's application for an interim injunction against Persons Unknown (“**the Claimant's Application**”). By letter received the

yesterday evening (26 February 2025), the Claimant indicated that it does not oppose the joinder application.

2. The Proposed Intervener's applications were made as a matter of urgency and without the benefit of time to prepare detailed submissions. The ELSC became aware of the Claimant's Application on Friday, 21 February 2025: Ost 1 at [8]. Counsel was instructed promptly after the weekend, on 25 February 2025.
3. This follows solely from the Claimant's leisurely and opportunistic approach to its own urgent injunction:
 - 3.1. The Claimant relies on two protests by Cambridge 4 Palestine at Senate House Yard and Greenwich House, that concluded on 30 November 2024 and 6 December 2024 respectively: Rampton 1 at [46], [53] {**HB/54-55**}.
 - 3.2. More than two months after these events, on 12 February 2025, the Claimant filed its Claim Form and Application Notice. The Claimant at that stage did nothing to bring that filing to the attention of any Defendant or potential Intervener.
 - 3.3. Instead, those documents were held back for another week, being served only on 19 February 2025: Maw 1 at [4]-[7]. As there are no named Defendants, service is said to have been accomplished by posting notices electronically to the University's website, physically upon the affected properties, and by writing to email addresses said to belong to Cambridge 4 Palestine. Even though the class of Defendants extended well beyond Cambridge 4 Palestine, to any individual acting "*for a purpose connected to the Palestine-Israel conflict*", the Claimant made no attempt to contact or serve any other organisation that may have wished to intervene.
 - 3.4. The Claimant only served its papers after it had already acquired a listing date of 27 February 2025, with that date appearing in the service documents: see e.g. Exhibit SM1 at pg. 3.
 - 3.5. The ELSC only became aware of the application documents indirectly, two days after they were posted online and less than a week before hearing.

4. The scope of the injunction that the Claimant has rushed to hearing is broader than any comparable newcomer injunction in the university protest context. It would potentially affect all those who manifest any speech, action or belief “*connected with the Palestine-Israel conflict*”, whether or not in the context of protest. It would cover highly symbolic properties in the heart of the University of Cambridge. It would extend for 5 years from date of order, remaining in effect until 2030. It would prohibit a wide array of conduct, all of which is said to somehow ground a claim in trespass or nuisance.
5. These issues plainly require determination, even on an interim basis, upon consideration of full legal submissions and evidence, and particularly on the severe human rights and equality implications. The Claimant’s compressed timetable to hearing has therefore necessitated the making of an adjournment application: in the time available, there has simply been insufficient time for the ELSC (or any party) to prepare submissions and evidence on the merits. The Claimant seeks to gain the benefit of a wide-ranging injunction, with none of the scrutiny.

B. JOINDER

6. The ELSC seeks joinder in this matter to address the court (in due course) on the Claimant’s Application. The joinder application is not contentious. For good order, joinder is appropriate here because:
 - 6.1. There are no named Defendants, and there is reason to believe that no individual Defendant would be willing to become a named party: Ost 1 at [15]. In particular, the Claimant’s submissions (but not its Draft Order) focus on students at the University, who face particular financial and disciplinary vulnerabilities in defending claims brought by the University.
 - 6.2. In the circumstances, the ELSC is well-placed to fulfil a protective role: Ost 1 at [16]. Its mission already extends to protecting the legal interests of pro-Palestine protestors in the UK, and it has the legal and other resources available to effectively assist the Court with submissions in due course.
7. To that end, the ELSC seeks joinder, either pursuant to CPR 19.2(2) or under the Court’s inherent jurisdiction, as is standard: Ost 1 at [17].

C. ADJOURNMENT

8. Subject to joinder, the ELSC seeks the adjournment of the hearing of the Claimant's Application. The Claimant by its letter yesterday expressed its opposition to this application, on the basis that (i) its injunction does not raise significant or novel questions of legal and public interest; and (ii) there is a real and imminent risk to the University in respect of the 1 March 2025 graduation. Neither argument is sound.
9. First, on the injunction sought, the Claimant does not seek a straightforward newcomer injunction. The draft order is materially different in its core provisions from prior orders in university protest cases. Most strikingly, the inclusion of the phrase "*or otherwise for a purpose connected with the Palestine-Israel conflict*" in the Defendant definition is unprecedented. In singling out a particular form of political speech, action or belief, the injunction brings into question the University's compliance with Articles 9, 10 and 11 ECHR (including as read with Article 14) and the Equality Act 2010. Further, if ordered, the injunction threatens prejudice to this broad and undefined category of individuals in respect of a wide-ranging set of conduct, for an extensive period, by reference only to the alleged "*purpose*" for which they perform that conduct: Ost 1 at [21].
10. This view on the merits is shared with other interested parties, who (given the short notice) have been unable to attend. I understand that Liberty wrote to the Court yesterday, expressing its view that full submissions should be heard on matters pertaining to freedom of expression and protest on campus. The Cambridge Students' Union is also considering intervention, to make factual submissions on the impact on students: Ost 1 at [24].
11. It is apparent that the Claimant does not appreciate the full scope of the injunction it seeks, and its ramifications for affected individuals. For example:
- 11.1. In Rampton 2 at [37], the Claimant's evidence is that "[t]he University does not intend to alter the approach it has historically taken in respect of student-led peaceful protests". But nothing in the injunction excludes "*student-led peaceful protests*", which would be straightforwardly caught by the terms of the Draft Order where "*connected with the Palestine-Israel conflict*".

- 11.2. The Claimant's skeleton at [35] expressly (and rightly) rejects an injunction that covers "*individuals who come onto the Land [...] without any intention of carrying out the Direct Action*" as excessively broad. But the Claimant's Application would have precisely this effect: there is no limitation for "*intention*" in the Draft Order, let alone an intention to carry out any particular action on the land.
12. It is inappropriate that the Claimant gain the benefit of the injunction while awaiting a full hearing on contested merits. It appears that the Claimant is treating its application as akin to an ex parte freezing injunction, subject only to the full and frank disclosure duty pending a prompt return date. To that end, it is noted that the Claimant seeks an annual review of the interim injunction: paragraph 5 of the Draft Order {**HB/27**}. The Claimant does not seek any direction for a final determination hearing.
13. In any event, this is the wrong approach. The Supreme Court in *Wolverhampton* at [173]-[176] {**AB/191-192**} was clear that a newcomer injunction is only 'without notice' for the purposes of the Persons Unknown. But where an applicant has in fact alerted other bodies capable of making submissions, there is no principled reason for not subjecting the application to the usual requirements for reasonable notice (and its exceptions). This is the procedurally fair result of the obligation to advertise: that, where appropriate, the applicant is subject to the scrutiny of a contested hearing.
14. **Second, on urgency**, the starting point is that the Claimant has not proceeded expeditiously. The points made on timing at paragraph 3 above are repeated. The Claimant waited two months from the time of the allegedly pertinent conduct to filing, and a further week before attempting to tell anyone what it had done. This is not the conduct of a Claimant fearing real and imminent risk of prejudice.
15. The single urgent matter on which the Claimant relies is the graduation ceremony on 1 March 2025 at the Senate House. The Claimant has known that date since at least mid-2024: see Exhibit ER1 pg. 214 {**HB/300**}.
16. The Claimant has provided no evidence that any protest is expected or planned at the Senate House on 1 March 2025. The highest the Claimant's evidence goes is: (i) that Cambridge 4 Palestine have made public posts about, for example, its "*commit[ment]*" to the "*struggle*" for Palestine (but has not threatened to disrupt the 1 March 2025

graduation): Rampton 1 at [146]-[152] {HB/76-78}; and (ii) that protests by Cambridge 4 Palestine have previously caused the University to re-locate two of its several graduation ceremonies in 2024, on 16 May and 30 November respectively.

17. On the contrary, the Proposed Intervener has provided evidence that Cambridge 4 Palestine is not intending to protest or otherwise take direct action in or at the Senate House Yard on 1 March 2025, but rather to conduct a protest across the road at Great St Mary's church (on public land): Ost 1 at [28.2]; Exhibit AO1. The date, time and location of the protest suggests that Cambridge 4 Palestine wishes to garner the attention of those attending the graduation. It is implausible, and inconsistent with the available evidence, that Cambridge 4 Palestine separately intends to take any action on the Senate House Yard that would threaten the ceremony (and thereby their own publicly advertised protest).
18. In the circumstances, an adjournment is appropriate, to allow full submissions on the merits of the application in good time and by all appropriate Interveners. The ELSC suggests that the hearing of the Claimant's Application be relisted for:
 - 18.1. The week commencing 14 April 2025 before the end of Hilary Term, permitting determination before the University returns for Easter Term on 29 April 2025; or
 - 18.2. Alternatively, for the week commencing 24 March 2025, before the University's next graduation ceremony on 29 March 2025 (assuming the Claimant can produce any evidence of a real risk to that ceremony).

D. MERITS OF THE CLAIMANT'S APPLICATION

19. If the Court does not order an adjournment, I am instructed that, for the reasons of timing given above, the ELSC reserves all its rights in respect of the merits of the Claimant's Application, pending a full hearing of the matters with comprehensive legal and factual submissions (either at final determination or upon review, whichever is sooner). The ELSC requests that directions for that hearing be included in any order.

GRANT KYNASTON

Blackstone Chambers

27 February 2025

N244

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court		Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
	H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)		
Claimant's name (including ref.)		
Defendant's name (including ref.)		
Date		

1. What is your name or, if you are a legal representative, the name of your firm?

2. Are you a Claimant Defendant Legal Representative
 Other (please specify)

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with?
 at a hearing without a hearing
 at a remote hearing

6. How long do you think the hearing will last? Hours Minutes
 Is this time estimate agreed by all parties? Yes No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

9. Who should be served with this application?

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

954

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

- I believe** that the facts stated in section 10 (and any continuation sheets) are true.
- The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature

AM Ost

- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

Full name

Name of applicant's legal representative's firm

If signing on behalf of firm or company give position or office held

Applicant's address to which documents should be sent.

Building and street

Second line of address

Town or city

County (optional)

Postcode

--	--	--	--	--	--	--	--	--	--

If applicable

Phone number

Fax phone number

DX number

Your Ref.

Email

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: KB-2025-000497

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 PLANS 1 AND 2 ATTACHED TO
THE CLAIM FORM):

- (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

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

[DRAFT] ORDER

UPON the application of the Claimant for an interim injunction against the Defendants dated
12 February 2025 (“the Claimant’s Application”)

AND UPON the listing of the Claimant’s application for hearing on 27 February 2025

AND UPON the Proposed Intervener’s application for joinder and adjournment dated 26
February 2025

AND UPON reading the witness statement of Anna Ost dated 26 February 2025

AND UPON hearing counsel for the Proposed Intervener and counsel for the Claimant

IT IS ORDERED:

1. The European Legal Support Centre is joined to Claim No KB-2025-000497 as an Intervener.
2. The hearing of the Claimant's Application listed for 27 February 2025 is adjourned.
3. The hearing of the Claimant's Application is to be listed on a date to be fixed in consultation with counsels' clerks in the week commencing [21 April 2025].
4. Costs reserved.

Dated this [] day of [] 2025

First Witness Statement of Anna Ost
Proposed Intervener
AO1
26 February 2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: KB-2025-000497

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 PLANS 1 AND 2 ATTACHED TO
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- (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

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Proposed Intervener

FIRST WITNESS STATEMENT OF ANNA OST

I, Anna Ost, of European Legal Support Centre Ltd ("ELSC"), 44-48 Shepherdess Walk, London, England, N1 7JP will say as follows:

1. I am the Senior Legal Officer of ELSC, of the above address. I have conduct of this matter on behalf of the Proposed Intervener. I am duly authorised by the Proposed Intervener to make this witness statement.

2. Except where otherwise indicated, the facts set out in this witness statement are derived from my knowledge and are true. Where any facts or matters are not within my knowledge, I have stated the source of my information, and I confirm those facts are true to the best of my information and belief.
3. There is now produced and shown to me an exhibit marked **AO1**, a further document referred to in this witness statement. Nothing in this witness statement is intended to waive privilege and privilege is not waived.
4. I make this witness statement in support of the ELSC’s applications for:
 - 4.1. Joinder to the above matter as an intervener; and
 - 4.2. Adjournment of the hearing of the Claimant’s application for an interim injunction dated 12 February 2025.

A. BACKGROUND TO THE APPLICATIONS

5. The ELSC is an independent advocacy organisation focused on defending and empowering the Palestine solidarity movement in Europe through legal means. Its mandate expressly extends to defending the movement from restrictions to the fundamental rights of freedom of expression and assembly. A substantial element of the ELSC’s work is the provision of legal advice and support to advocates for Palestinian rights in the UK facing restrictions on their ability to protest and express their views.
6. The Claimant University seeks a ‘newcomer’ injunction against “*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*” *inter alia* enter, occupy, interfere with access to or erect a structure on:
 - 6.1. Greenwich House, an administrative office building at Madingley Rise;
 - 6.2. The Senate House and Senate House Yard, a formal building and lawn owned by the Claimant in the centre of the town of Cambridge, with ceremonial significance as the symbolic ‘heart’ of the University (where e.g. degree ceremonies and Senate meetings are held); and
 - 6.3. The Old Schools, a building in the same enclosed site as the Senate House and Senate House Yard housing certain University administrative departments.

7. The Claimant's Claim Form in this matter was filed under stamp dated 12 February 2025. The Claim Form, the Application Notice and evidence in support are said to have been served by (i) uploading a copy to the University website; (ii) sending an email to three email addresses purportedly related to the Defendants; and (iii) affixing a notice at the relevant locations setting out where the documents can be found.
8. The ELSC was not itself served with the Claim Form, or with the Application Notice. The ELSC became aware of the Claim and the Application on Friday 21 February 2025.

B. JOINDER

9. The ELSC seeks an order for joinder to this matter, for the purpose of making submissions in the interests of the Defendant class.
10. The ELSC seeks this order:
 - 10.1. Pursuant to CPR 19.2(2), because it is desirable to add the new party so that the Court can effectively resolve all the matters in dispute in the proceedings; or
 - 10.2. Alternatively, pursuant to the Court's inherent jurisdiction in respect of case management decisions.
11. The starting point for this application is the nature of the 'newcomer' injunction sought by the Claimant, which has no named Defendants. The Supreme Court in *Wolverhampton CC v London Gypsies and Travellers* [2024] AC 983 recognised the procedural fairness risk that injunctions without named Defendants may go undefended, with the result that the injunction may be ordered without scrutiny in a contested hearing: at [173]. The Court confirmed therefore that the notice requirement for a 'newcomer' injunction remained in place. But the Court was clear that the advertisement in advance fulfilled a different function (at [176]):

“[to] alert bodies with a mission to protect [the Defendants’] interests [...] and enable them to intervene to address the court on the [] application with focused submissions as to why no injunction should be granted in the particular case”.
12. Notably, the Court envisaged that such bodies should intervene before the injunction was granted in a particular case:

- 12.1. The submissions to be made by the body are as to the grant of the injunction (not to variation or discharge); and
- 12.2. The close nexus with the advertisement requirement of the Application Notice indicates that the body is intended to intervene at first instance, and not upon being notified of an injunction having been ordered.
13. The ELSC seeks to intervene on precisely this basis.
14. **First**, as in *Wolverhampton*, there are no named Defendants to this action, and no individuals who have been specifically served with the Claim Form or Application Notice. Nonetheless, the Claim has an expansive reach: all individuals who without the Claimant's consent "*for a purpose connected with the Palestine-Israel conflict*" enter the Claimant's property at any time in the next 5 years would be Defendants to the injunction sought. Many (if not most) of those individuals remain unaware that they are Defendants to this action, not least because the Claimant has no idea who those individuals might turn out to be.
15. **Second**, to my best knowledge and understanding, no individual in the Defendant class has named themselves or requested joinder. From my experience working with protesters in the past, I believe that it is unlikely that any individual would elect to take up that role:
- 15.1. The Defendants, who the Claimant in the Particulars of Claim at [2] consider to include those "*who purport to be students of the University*", will typically lack the financial resources and/or sufficient legal understanding to do so.
- 15.2. Identification as a named Defendant would require providing the Claimant with their name and address. I believe that Defendants may elect not to do so (and so fail to participate in proceedings) because of a fear that the Claimant would subject them to disciplinary penalty (e.g. in respect of participation in previous protests at Greenwich House or the Senate House Yard in late 2024) or to civil claims for trespass.
16. **Third**, and in any event, the ELSC is a particularly well-placed body for adopting this role:

- 16.1. The ELSC's mission extends to protecting the interests of persons in the Defendant class, including protestors on issues related to the Palestine-Israel conflict in particular.
- 16.2. The ELSC is a well-established institution with a track record of advocating for persons in the Defendants' position. It has the legal and other resources available to effectively assist the Court with the applicable submissions of fact and law in relation to the grant of the injunction.
17. As a matter of procedural formality, the ELSC invites the Court to make the order sought either pursuant to its power to join a party under CPR 19.2(2) or in exercise of its inherent case management jurisdiction.
- 17.1. The Court has previously permitted bodies to intervene in civil claims, both under CPR 19.2(2) (see e.g. *Dobson v Thames Water Utilities Ltd (Ofwat intervening)* [2007] EWHC 2021 (TCC) at [6] (reversed in part on appeal on other grounds)); or its inherent jurisdiction (see e.g. *Golden Eye (International) Ltd v Telefonica UK Ltd (Consumer Focus intervening)* [2013] EMLR 1 (ChD) at [9] (reversed in part on appeal on other grounds)).
- 17.2. It is unclear on the face of the published judgments on what basis the interveners in *Wolverhampton* were joined, other than that it was considered expedient at the CMC at first instance: *Barking and Dagenham LBC v Persons Unknown* [2021] EWHC 1201 (QB) at [112].

C. ADJOURNMENT

18. Subject to joinder, the ELSC seeks an order that the hearing of the Claimant's application for an interim injunction be adjourned, under the Court's general power of case management at CPR 3.1(2)(b).
19. The Claimant filed its Claim Form and Application Notice under stamp dated 12 February 2025. However, these documents were only published to the University's website a week later, on 19 February 2025 (last Wednesday): First Witness Statement of Samuel Maw at [5]. At the University's request, the hearing has been listed urgently for 27 February 2025 (tomorrow).

20. This urgency was unjustified: it threatens the orderly determination of the application and risks substantial prejudice to the Defendants.
21. **First**, the injunction sought raises significant and novel questions of legal and public interest. As explained below, it has not been possible for ELSC to develop adequate submissions or evidence on the various suspect grounds in the time available. However, it is clear on the face of the papers that the Claimant intends to seek an interim injunction in an unprecedented form, which is likely to pose significance prejudice to the large class of affected persons and their ECHR rights. Without limitation and reserving all rights to vary or add grounds in due course, the ELSC has identified the following issues that it considers will require full legal submission:
- 21.1. The compliance of the injunction with Articles 10 and 11 ECHR (including as read with Article 14) and/or the Equality Act 2010. I note in particular the description of the Defendants as including all those who *inter alia* access the Claimant's property "for a purpose connected with the Palestine-Israel conflict". As this description will affect the scope of any injunction the Court may make, on any terms, the ELSC understands that this will be a threshold question for the interim relief sought;
- 21.2. The geographic coverage of the injunction, extending to both the Senate House Yard (a significant location in the University) and Greenwich House;
- 21.3. The extended temporal scope of the injunction; and
- 21.4. The broad description of the prohibited conduct.
22. I note that the injunction sought differs materially in each of these respects from the otherwise similar order made on 30 October 2024 by Thompsell J in respect of Palestine-related protests at SOAS, University of London: University of London v Harvie-Clark, Mann, Adam & Persons Unknown [2024] EWHC 2895 (Ch). In any event, that order was made without the benefit of legal submissions on behalf of the named Defendants or any Intervener. I have been informed by Counsel for the Defendants since instructed in that case that the hearing for a final determination was adjourned, due to the importance of the Defendants receiving the benefit of legal representation. The date of this hearing has not yet been fixed.
23. None of these points are adequately addressed in the Claimant's witness evidence or in its Counsel's skeleton. In particular, the full and frank disclosure at [56]-[64] of Counsel's

skeleton addresses matters that the ELSC may wish to raise in due course, but none of its core concerns. It follows that, without adjournment, the Court will not have the opportunity to hear submissions on these key matters.

24. I understand from contact I have had with other interested parties that other bodies also intend to apply to intervene in due course. In particular, I believe that both Liberty and the Cambridge Students' Union are considering intervention, in order to make submissions within their mandate and expertise on freedom of speech and protest issues, and student welfare, respectively. These submissions, which are material to the determination of the Claimant's application, are not yet before the Court.
25. It is appropriate that the Court and the Claimant deal with the ELSC's (and any other) arguments at the initial hearing of the Claimant's application, rather than upon a later application to vary or discharge. It is incumbent on the Claimant to satisfy the Court of its application, at its own cost risk, before it gains the benefit of the relief it seeks, particularly given its far-reaching effect. It is therefore vital that the application receive the Court's close scrutiny at a contested hearing, including the consideration of submissions from the Proposed Intervener.
26. **Second**, the Claimant has not itself proceeded with its Claim expeditiously, despite now claiming it faces imminent prejudice if the injunction is not ordered urgently.
 - 26.1. The Claimant only filed its Claim Form and Application Notice on 12 February 2025. The Claimant therefore elected not to proceed for more than two months following the end of the protest at Greenwich House on 6 December 2024, or the protest at the Senate House on 30 November 2024 (both of which are now said to justify the injunction: First Witness Statement of Emma Rampton at [44]-[59] ("**Rampton 1**")).
 - 26.2. Even then, the Claimant failed to advertise the Claim Form or Application Notice for a full week following its filing: these documents were only made available on the Claimant's website on 19 February 2025. As a result of this delay, the ELSC only became aware of the application on 21 February 2025, less than a week before hearing.
 - 26.3. Despite its delay in commencing and advertising the claim, the Claimant still sought a hearing on two weeks' notice from date of the application.

- 26.4. None of the matters raised in Rampton 1 at [166] regarding this delay justify the Claimant's conduct. Ms Rampton explains only that (over the course of more than 2 months) the Claimant prioritised other legal proceedings and undertook internal discussions as to how to proceed. Those are matters for the Claimant and its own resourcing. It is no reason to subject the Defendants and the Proposed Intervener to the obvious prejudice caused by rushing to hearing.
27. As a result of the Claimant's approach to its application, both the Defendants and potential interveners (including the ELSC) have been denied the opportunity to seek advice, instruct counsel, and prepare the submissions and evidence necessary to adequately respond to the application, all in time to participate effectively at a hearing on 27 February 2025.
28. **Third**, the only basis of actual urgency on which the Claimant relies is the graduation due to take place at the Senate House on 1 March 2025: Rampton 1 at [165]. This is insufficient to justify the Claimant's approach.
- 28.1. The Claimant has provided no evidence of any planned protest at the Senate House that is due to affect that graduation. The highest its evidence goes is to rely on vague and rhetorical posts by Cambridge 4 Palestine (the collective whose actions are said to justify the injunction) about the group's "*commit[ment]*" to the "*struggle*" and intention to "*redouble[]*" efforts: Rampton 1 at [146]-[152]. Without more, these statements are plainly insufficient to give rise to the requisite fear of imminent harm justifying urgent determination.
- 28.2. In the event, Cambridge 4 Palestine has made no public announcement that it intends to hold a protest at the Senate House or in Senate House Yard on 1 March 2025. On the contrary, Cambridge 4 Palestine has indicated that it intends to protest at Great St Mary's instead. I exhibit at **AO1** publicly accessible posts by Cambridge 4 Palestine advertising the protest on a range of social media (including Facebook, Instagram, and X). From these advertisements, it appears that this protest will take place outside the designated property covered by the injunction, and on land which I understand is public and not owned by the University. For the avoidance of doubt, I do not believe that the University would have any entitlement to injunct a protest taking place outside Great St Mary's on 1 March 2025 (and none is sought by the Claimant).

- 28.3. Any graduation at the Senate House has no bearing on the injunction sought in respect of Greenwich House, which is almost 2 miles away.
- 28.4. There are no protestors currently on site at either Greenwich House or Senate House Yard. In the absence of any evidence of a planned protest, the risk identified is, at its highest, speculative.
- 29. The Proposed Intervener’s application for adjournment would cause no material prejudice to the Claimant, but would allow its injunction application to be considered in good order and on full submissions by affected parties.
- 30. The Proposed Intervener proposes an adjournment of eight weeks, for listing in the week commencing 21 April 2025. This would allow the development of reasoned submissions and potentially the addition of further Interveners. This would allow the matter to be determined in good time before the commencement of Easter Full Term at the University, on 29 April 2025.
- 31. In the alternative, the Proposed Intervener notes that the next graduation at the Senate House after 1 March 2025 is 29 March 2025. A determination in the week commencing 24 March 2025 would put great pressure on the Proposed Intervener and any potential Defendants. However, if the University is capable of demonstrating a real and imminent risk to that ceremony, the ELSC would be willing to consider a four-week adjournment to facilitate prior determination.

Statement of Truth

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.

Signature: *AMost*

Dated: ...26.2.2025.....

First Witness Statement of Anna Ost
Proposed Intervener
AO1
26 February 2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: KB-2025-000497

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 PLANS 1 AND 2 ATTACHED TO
THE CLAIM FORM):

- (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

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Proposed Intervener

EXHIBIT "AO1"



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UNIVERSITY OF CAMBRIDGE

IS ATTEMPTING TO CRIMINALISE THE MOVEMENT FOR PALESTINE



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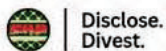


2/8

CAMBRIDGE'S CLAIM

In a claim dated 12 February, Cambridge University filed for a 5-year injunction to **criminalise** protests for Palestine on or around Senate House, Old Schools, and Greenwich House, threatening its own students with **imprisonment and fines** for protesting genocide.

- (1) An order that until 12 February 2030 the Defendants must not, without the consent of the Claimant:
- a. Enter, occupy or remain upon the Land.
 - b. Block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land.
 - c. Erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.



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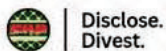
3/8

EXPLICITLY TARGETING THE PALESTINE MOVEMENT

2. The Defendants are comprised of Persons Unknown, who purport to be students of the University, protesting in relation to the Israel-Palestine conflict and the University's alleged complicity in the actions of the Israeli Defence Force, such as by its investments in and research arrangements with the defence industry. Many of them appear to be

Defining the "Defendants" as anyone protesting "in relation to the Israel-Palestine conflict and the University's alleged complicity in the actions of the Israeli Defence Force," Cambridge seeks to single out and criminalise anyone protesting for Palestine, continuing its pattern of racist targeting.

By the terms of its claim, something as simple as a graduating student waving a Palestinian flag outside of their Senate House ceremony could constitute "obstruction."



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DANGEROUS PRECEDENT FOR POLITICAL SPEECH

25. Even if it were found that an injunction would amount to an interference with the Defendants' Article 10/11 ECHR rights by a public authority, any such interference would be justified in that:

The claim attempts to justify the use of an injunction "even if" it interferes with students' "rights to freedom of expression and assembly."

To meet peaceful civil disobedience with violent policing and criminalisation sets a chilling precedent for academic freedom at large, following the lead of US and UK universities that have turned campuses-- spaces of learning and expression--into hostile environments for any meaningful exchange.



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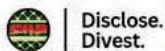
“EVEN AFTER THE CEASEFIRE”

The University’s claim expresses surprise at the fact that our movement remains committed to our struggle “even after the ceasefire.”

“We will be back”, under the tag line “We Will Not Stop. We Will Not Rest”. Similarly, even after the ceasefire between Israel and Hamas was announced on 15 January 2025, Cambridge for Palestine announced the following on its social media channels on 18 January 2025:

“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.”

As we speak, the Zionist occupation continues to make Gaza unliveable, Palestinian prisoners are being from barred release, and the West Bank is under military attack with over 40,000 indefinitely displaced. Cambridge’s moves distract from the core issue: its ongoing moral and material complicity in genocide as Israel violates basic commitments and US politicians greenlight the ethnic cleansing of Gaza.



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TO PROTEST WITHOUT DISRUPTION

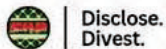
The University has justified its repressive moves, claiming a lack of "less restrictive" alternatives to prevent disruption.

25.3. There are no less restrictive alternative means available to achieve the aims.

In the past months, the University has manipulated and rejected attempts to seek urgent action on divestment through administrative channels, and has refused to engage with student protesters, proactively choosing repression instead.

We protest not with the objective of "disruption," but because it is the only moral, principled option available to us.

At a university that has made it "normal" to pour money into mass murder, any act of protest--whether an occupation or a waving of a flag--constitutes disruption.



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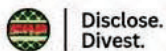


cambridgeforpalestine and 4 others



7/8

The University of Cambridge may seek to weaponise legal tools and bureacracy against us, but in doing so, it will only further alienate itself from students, faculty, and people of conscience who refuse to remain silent at an institution entrenched in violence.



2,079



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8/8

RALLY:
SATURDAY
01/03 11 AM
GREAT ST.
MARY'S

LONG LIVE THE
STUDENT INTIFADA.
LONG LIVE
PALESTINE.



2,079



34



499



cambridgeforpalestine BREAKING: Cambridge takes unprecedented steps to repress the movement for Palestine. The struggle for divestment and liberation will not be deterred. 🇵🇸



979



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RALLY:
SATURDAY
01/03 11 AM
GREAT ST.
MARY'S

LONG LIVE THE
STUDENT INTIFADA.
LONG LIVE
PALESTINE.



2,083



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< Cambridge for Palestine's post



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SATURDAY
01/03 11 AM
GREAT ST.
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LONG LIVE THE
STUDENT INTIFADA.
LONG LIVE
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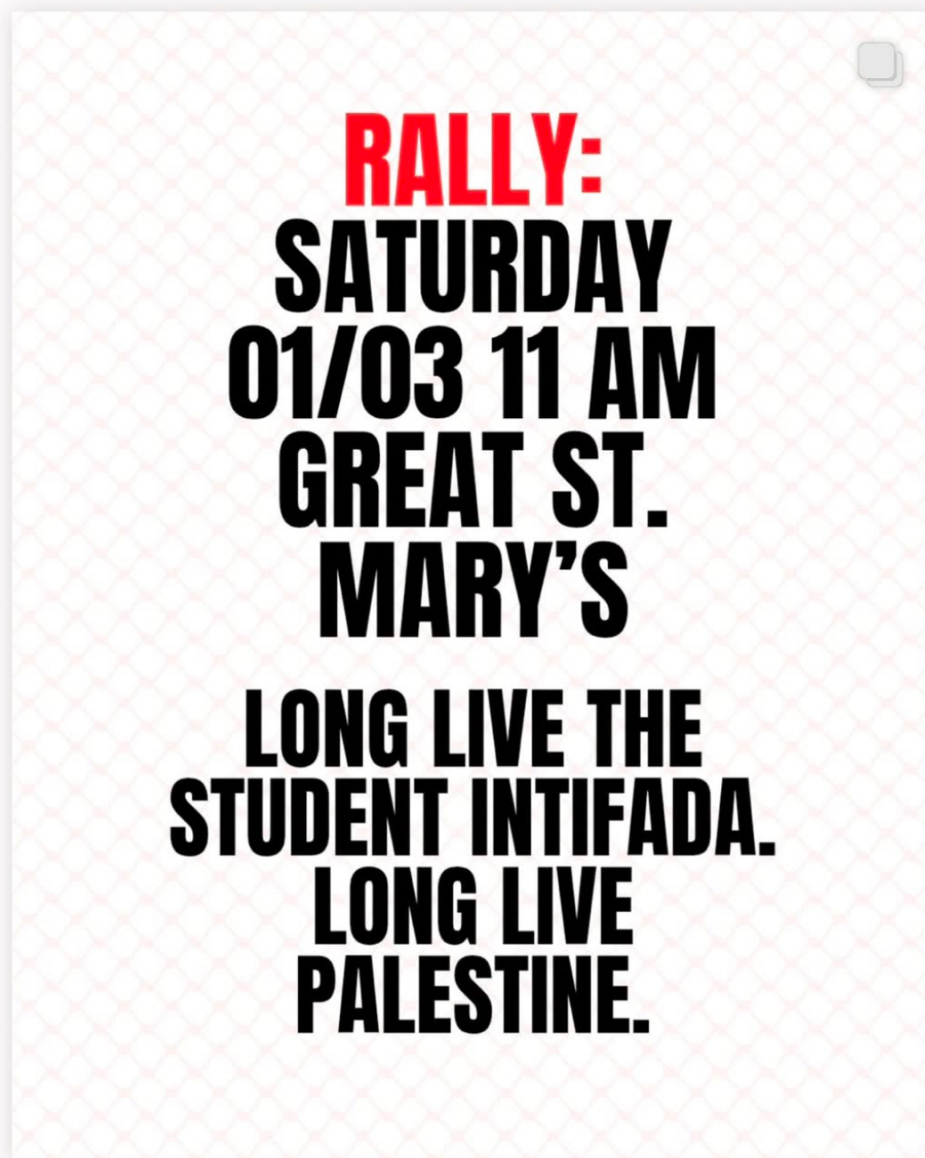
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Cambridge for Palestine

Stories · 22h ·





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Cambridge for Palestine @cam4palestine

Join us on Saturday. If they come for us in the morning they will come for you in the evening.

RALLY:
SATURDAY
01/03 11 AM
GREAT ST. MARY'S
LONG LIVE THE STUDENT INTIFADA.
LONG LIVE PALESTINE.

The University of Cambridge may seek to weaponise legal tools and bureaucracy against us, but in doing so, it will only further alienate itself from students, faculty, and people of conscience who refuse to remain silent at an institution entrenched in violence.

Disclose. Divest.



Cambridge for Palestine @cam4palestine · 20h

x.com/cam4palestine/...

University tried for a 5-year injunction to criminalise protests for Palestine on or around Senate House, Old Schools, and Greenwich House, threatening its own students with imprisonment and fines for protesting genocide.

(1) An order that until 12 February 2030 the Defendants must not, without the consent of the Claimant:

- a. Enter, occupy or remain upon the Land.
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Defining the "Defendants" as anyone protesting "in relation to the Israel-Palestine conflict and the University's alleged complicity in the actions of the Israeli Defence Force," Cambridge seeks to single out and criminalise anyone protesting for Palestine, continuing its pattern of racist targeting.

By the terms of its claim, something as simple as

25. Even if it were found that an injunction would amount to an interference with the Defendants' Article 10/11 ECHR rights by a public authority, any such interference would be justified in that:

The claim attempts to justify the use of an injunction "even if" it interferes with students' "rights to freedom of expression and assembly."

"We will be back", under the tag line "We Will Not Stop, We Will Not Rest". Similarly, even after the ceasefire between Israel and Hamas was announced on 15 January 2025, Cambridge for Palestine announced the following on its social media channels on 18 January 2025:

"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."

Post your reply



From: HRC-SR FreeAssembly-ROMERO <hrc-sr-freeassembly-romero@un.org>
Date: 27 February 2025 at 03:59:27 GMT
To: ROLE Vice-Chancellor <Vice-Chancellor@admin.cam.ac.uk>
Cc: VCO Enquiries <VCO.Enquiries@admin.cam.ac.uk>, Emma Rampton <Emma.Rampton@admin.cam.ac.uk>, Gloria De Marino <gloria.demarino@un.org>, Vanessa Asensio Perez <vanessa.asensioperez@un.org>, "Gina Romero [GMAIL]" <grsrfoaa@gmail.com>
Subject: Message from the United Nations Special Rapporteur of Freedom of Assembly and of Association

Mr. Vice Chancellor University of Cambridge
Ms. Emma Rampton

Good morning. I am Gina Romero, United Nations Special Rapporteur on Freedom of Association and Peaceful Assembly.

I would like to express my concern about some allegations I have received regarding University's claim for a precautionary injunction to restrain trespass in University's premises and in relation with the university based pro-Palestine movement.

I feel obliged to remind the University of Cambridge that the international standards of protection of the right to freedom of peaceful assembly (mainly [General Comment 37](#)) indicates that "Any restrictions on participation in peaceful assemblies should be based on a differentiated or individualized assessment of the conduct of the participants and the assembly concerned. Blanket restrictions on peaceful assemblies are presumptively disproportionate".

As the claim filled by the University to the High Court of Justice are solely focus on 'Cambridge for Palestine' or 'purpose connected with Palestine-Israel conflict', it violates the principle of non-discrimination and content neutrality that are part of the international standards for the protection of the right to freedom of peaceful assembly and association.

Besides, the claim includes: i) blanket bans of actions and equipment: entering, occupying or remain upon, block, prevent, slow down, obstruct or interfere with access; erect any structure (including tents and sleeping equipment), ii) blanket bans on specific places: Greenwich House, Senate House and Senate House Yard, The Old schools.

As mentioned before, blanket prohibitions go against the standards, that clearly indicates that: Peaceful campus assemblies should be guaranteed and protected wherever they take place (outdoors, indoors, online; in public and private spaces; or a combination thereof), and regardless of their forms (demonstrations, protests, meetings, processions, rallies, sit-ins, candlelit vigils and flash mobs, civil disobedience campaigns, camps, etc.), whether they are stationary or mobile.

Besides, restrictions, unless justified as necessary on a case-by-cases basis, should not be imposed on elements of:

- i. The time of assemblies, as “participants must have sufficient opportunity to manifest their views or to pursue their other purposes effectively”,
- ii. Their frequency, as “the timing, duration or frequency of a demonstration may, play a central role in achieving its objective. However, the cumulative impact of sustained gatherings may be weighed in a proportionality assessment of a restriction”,
- iii. The number of participants and their place, as “peaceful assemblies may in principle be conducted in all spaces to which the public has access or should have access (...) they should not be relegated to remote areas where they cannot effectively capture the attention of those who are being addressed or the general public”.
- iv. The equipment used, as “participants should be left to determine whether they want to use posters, megaphones, musical instruments or other technical means, such as projection equipment, to convey their message. Assemblies may entail the temporary erection of structures, including sound systems, to reach their audience and achieve their purpose”.

Besides, requesting 'consent' for the assemblies, as it is included in the claim, is also against the standards that recommends notification systems, but with the understanding that the notification "must not be misused to stifle peaceful assemblies (...) The enforcement of notification requirements must not become an end in itself, (and...) the notification procedures should be transparent, not unduly bureaucratic, proportionate to the potential public impact of the assembly concerned".

Also the standards are very clear when they indicate that "a failure to notify the authorities of an upcoming assembly, where required, does not render the act of participation in the assembly unlawful, and must not in itself be used as a basis for dispersing the assembly or arresting the participants or organizers, or for imposing undue sanctions (...) Lack of notification does not absolve the authorities from the obligation, within their abilities, to facilitate the assembly and to protect the participants".

Last year I issued a series of recommendations for universities so that they can align their actions and regulations with international standards for the protection of human rights. You can find the document here:

<https://www.ohchr.org/sites/default/files/documents/issues/association/statements/20241004-stm-sr-association.pdf> I invite you to read it and check how align are the University's policies and practices with the international human rights standards.

I respectfully but strongly call on you to ensure that blanket bans are not imposed.

As the recommendations document includes, in universities located on private property, gatherings and peaceful protests are still protected under the right to freedom of peaceful assembly. While certain restrictions may be applied to safeguard the rights and interests of others property stakeholders, these must be assessed on a case-by-case basis. This underscores the importance of refraining from imposing blanket restrictions. The use of “trespassing” offences for peaceful assemblies carried out on the private property of academic institutions should be assessed strictly against the necessity and proportionality principles. Criminal charges for non-violent protest activity are disproportionate.

Besides, I want to call to your attention the more recent report presented to the UN General Assembly by the Special Rapporteur for the right to freedom of expression, Irene Khan, that is also very relevant for the update of your own policies and standards:

<https://www.ohchr.org/en/documents/thematic-reports/a79319-global-threats-freedom-expression-arising-conflict-gaza-report>

I am more than willing to work with you all on the review of internal policy and practice, and to discuss this further if you wish. Please, do not hesitate in sending me any information you consider is relevant for informing my action and work pertaining to the information included in this email.

Respectfully,



GINA ROMERO

UN Special Rapporteur on the rights to freedom of peaceful assembly and of association
Relatora Especial de Naciones Unidas para los derechos de libertad de asamblea pacífica y de asociación.

Link tree: <https://linktr.ee/GinaRomero>

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LIBERTY

King's Bench Division
The Royal Courts of Justice
Strand
London
WC2A 2LL

By email only to: KBJudgesListingOffice@Justice.gov.uk;
Jessica.Turner1@justice.gov.uk
Copied to: Samuel.maw@mills-reeve.com;
millsreeve100@mills-reeve.com

Date: 26 February 2025
Our ref: KW/340

LAWYERS

Chanel Dolcy, Solicitor
Megan Goulding, Solicitor
Katy Watts, Solicitor
Louise Whitfield, Solicitor

The solicitors employed by Liberty are individually authorised and regulated by the Solicitors Regulation Authority.

- URGENT -

Dear Judge

Re: KB-2025-000497; THE CHANCELLOR, MASTERS, AND SCHOLARS OF THE UNIVERSITY OF CAMBRIDGE v PERSONS UNKNOWN

1. I write on behalf of Liberty, further to the above matter which we understand is listed for hearing before the Court on 27 February 2025. Liberty first became aware of these proceedings on 25 February 2025. We hope that this letter will be of assistance to the Court.
2. The Claimant's application for injunctive relief raises questions of importance regarding the use of injunctions against persons unknown in the context of protest on university campuses. Liberty writes to express its interest and concern in the matters raised in the application, and to express support for the application made by the European Legal Support Centre ("ELSC") for the proceedings to be adjourned.
3. Liberty was formed in 1934 to protect the right to peaceful protest and frequently appears before the Court in protest cases as both claimant and intervener. Recently, Liberty has intervened in support of protest rights in proceedings concerning persons unknown injunctions, including in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45 ("*Wolverhampton*") and *MBR Acres Limited v John Curtin and Persons Unknown* [2025] EWHC 331 (KB).
4. In Liberty's view, the breadth of the injunction sought by the Claimant raises issues of significant public interest. The scope of the injunction goes beyond any comparable persons unknown injunction in the protest context that we are aware of, including in respect of the prohibited conduct, the categories of identified defendants, and the temporal scope of the injunction. We are concerned that the proposed injunction appears to capture any kind of protest activity at all within the two specified sites, based only on the subject matter of the protest.
5. Freedom of expression and protest on campus for staff and students merits serious consideration by the Court, and this matter would benefit from full ventilation of the

issues at stake. The application was first published on the Claimant's website on 19 February 2025 and listed urgently for 27 February 2025 at the request of the Claimant. In circumstances where a defendant has not been identified by the Claimant, seven days is not an adequate period of time to allow any affected party to identify themselves, obtain legal advice on the merits of defending the application, and prepare their case.

6. We understand that the ELSC is preparing to apply to be joined to the proceedings as an intervener in order to make arguments in support of persons unknown who would be bound by the injunction. Unless and until that application is granted, there is no party in a position to adequately defend this application. If the ELSC are granted permission to intervene, they will require time to prepare their submissions in order to participate fully in the proceedings. Accordingly, an adjournment is necessary in order to ensure that any defendants are able to identify themselves, and/or to allow any parties with a substantial interest in the proceedings to be joined.
7. Further, in contrast to other applications for injunctive relief sought in similar contexts, it does not appear that there is any extant protest activity that the Claimant seeks to restrain through this application. Absent any immediate risk to the Claimant, we respectfully ask that the Court grant an adjournment to allow any defendants and/or other parties to participate in these important proceedings.

Should there be any further way in which Liberty can assist the Court, please do not hesitate to contact us.

A copy of this letter has been provided to the Claimant.

Yours faithfully



Katy Watts
Solicitor, Liberty

020 7378 3251

Katyw@libertyhumanrights.org.uk

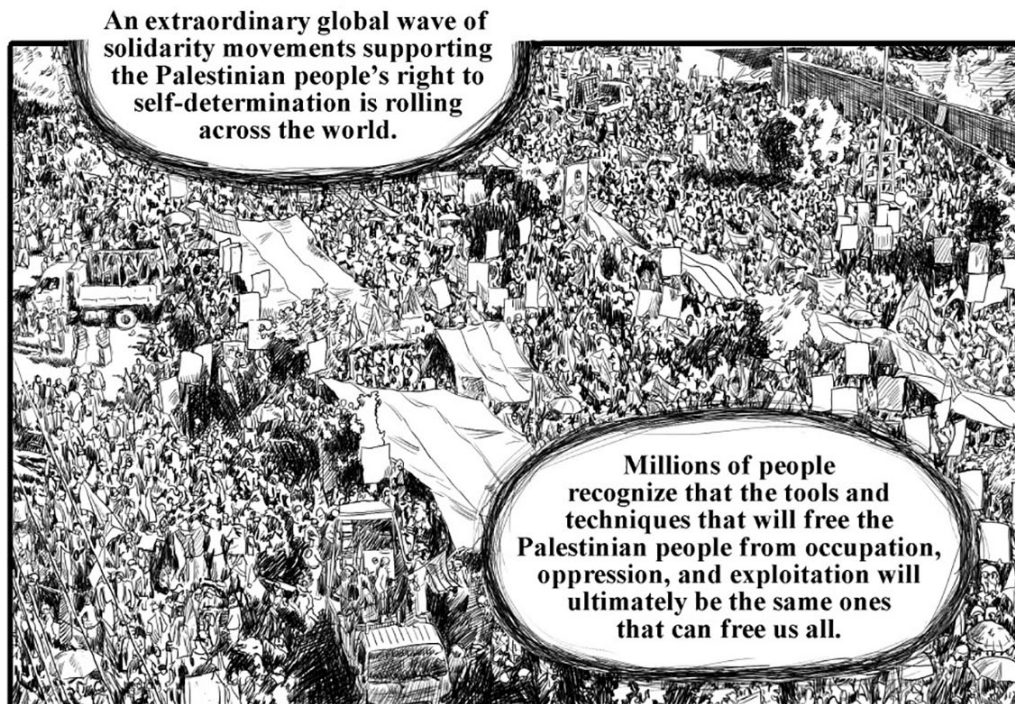


STATEMENT FROM THE UN SPECIAL RAPPORTEUR ON THE RIGHTS OF
FREEDOM OF PEACEFUL ASSEMBLY AND OF ASSOCIATION

Recommendations for universities worldwide for the second semester of 2024: Safeguarding the right to freedom of peaceful assembly and association on campuses in the context of international solidarity with the Palestinian people and victims

Date: 02 October 2024

By **Gina Romero**, UN Special Rapporteur on the rights to freedom of peaceful assembly and of association (FoAA).



“Starvation and the right to food, with an emphasis on the Palestinian people’s food sovereignty”. Michael Fakhri, SR on the Right to Food. Illustrated by Omar Khouri.

Since October 2023, when 1,200 civilians were killed by a Hamas attack on Israel, the Gaza Strip has been subjected to genocidal violence and intensified assault that have reportedly claimed the lives of more than 40,000 people, almost half of them - over 16,000 - are children, and have destroyed most educational facilities, including schools, universities, public libraries, and hospitals, among other vital civilian infrastructure; generating a deep humanitarian crisis, including famine.¹ This latest assault on the Palestinian people, part of the decades-long illegal occupation campaign implemented by Israel, has given rise to an increase in international solidarity movements around the world in support to the Palestinian victims, and with Palestinian people's rights to self-determination². Many of these protests have been led by university students.

According to information from various sources, mass demonstrations and protests, as well as occupations, encampments and other types of peaceful assemblies, were held in different parts of the world. Just between 7 October and end-November 2023, around sixty countries witnessed demonstrations to protest the atrocity crimes against Palestinians;³ besides, some reports and independent mapping initiatives indicate that more than 170 camps were established in the first semester of 2024, mainly in university settings, distributed across 35 countries worldwide.

This massive civic mobilisation, which lasted months and is unprecedented in recent history, emerged amidst severe restrictions on the right to freedom of peaceful assembly at a global level. By 2023, 118 countries have serious civic space restrictions and only 2.1 per cent of people live in countries with open civic spaces, resulting in a severe impact on freedom of expression (including intimidation of journalists and media outlets), freedom of peaceful assembly (with use of excessive force and arrests of protesters) and freedom of association (including harassment of human rights defenders and civil society activists).⁴

The last thematic report presented by the previous mandate holder, Clement Voule, “[Preserving gains and pushing back against global attack on civic space and growing authoritarianism](#)” identified widespread trends in threats against the rights to freedom of peaceful assembly and of association (FoAA), including increasing stigmatization and attacks against civil society and social movements, criminalization of activists, indiscriminate and excessive use of force to counter or repress peaceful protests, and growing militarised approaches to peaceful protests; restrictions targeting marginalised groups, among other, that have escalated in scope and severity and have expanded across all regions.⁵

¹ According to the UN Special Rapporteur on the right to food, Michael Fakhri, *Starvation and the right to food, with an emphasis on the Palestinian people's food sovereignty* (A/79/171, 2024), paragraphs 1 and 64. See also A/HRC/56/CRP.4, para 267. Further, on 9 July 2024, the UN independent experts declared a famine spreading across the entire Gaza Strip, and that “Israel's intentional and targeted starvation campaign against the Palestinian people is a form of genocidal violence”, see <https://www.ohchr.org/en/press-releases/2024/07/un-experts-declare-famine-has-spread-throughout-gaza-strip>.

² Throughout the document, when talking about ‘pro-Palestine movement’ it will refer to the global movement of international solidarity in support to the Palestinian victims, with Palestinian people's rights to self-determination, and that is defending and speaking out for a ceasefire in Gaza, call for peace, prevention of genocide, an end to the occupation, and justice.

³ Demonstrations in support of Israel were recorded in at least 39 countries. See Carnegie Endowment for International Peace.

⁴ CIVICUS, 2024 State of Civic Society Report, <https://shorturl.at/xUPBI>

⁵ A/HRC/56/50

Also, the report indicated that pro-Palestinian peaceful protests and social movements faced significant restrictions, protest bans and arbitrary arrests, especially in Western countries, which created a hostile environment and a chilling effect for those defending and speaking out for the rights of Palestinians, a ceasefire in Gaza, prevention of genocide, an end to the occupation, and justice.⁶ Special procedures mandate holders called for an end to the harassment and criminalisation of pro-Palestinian activists and protesters, and urged States to stop misusing hate speech imposing undue restrictions on legitimate protests, including in academic institutions, and online.⁷

The first report that the new UN Special Rapporteur on the rights to freedom of peaceful assembly and association, Ms Gina Romero, will present at the United Nations General Assembly in 2024, “[Protecting the rights to freedom of peaceful assembly and of association from stigmatization](#)” further found that students participating in pro-Palestinian solidarity protests have been targeted with severe stigmatizing narratives and unjustifiably “vilified by public authorities in some States as supporting ‘terrorism’”. The Special Rapporteur stated in her report that:

*“Pro-Palestinian solidarity movements are among those facing increased levels of stigmatization online and offline by authorities and non-State actors. This stigmatization has triggered further sweeping restrictions and repression (...) have created a hostile environment for pro-Palestinian expressions and activists, (...) and had increased racism and hate”.*⁸

To assess the situation and respond to several persistent allegations of serious violations against peaceful student protesters received by the mandate between May and July 2024, the Special Rapporteur, held seven virtual consultations and interviews with 30 students who either lead or participated in on-campus peaceful protests and encampments in six universities in four countries: France, the Netherlands, the United Kingdom, and the United States of America; and held face to face discussion with a group of 10 scholars, students, civil society organizations, and human rights defenders in Germany.

Additionally, the Special Rapporteur participated in two group meetings with other mandate holders: one online, attended by approximately 35 students from at least nine universities in the USA; and a face to face meeting held in Geneva with the participation of students from schools and universities in Switzerland, or their representatives. Additionally, the Special Rapporteur consulted about the experiences in leading and/or participating and monitoring pro-Palestine peaceful assemblies with a group of 39 activists, journalists and human rights defenders from the Middle East and North of Africa Region, including Palestinian activists, during a regional consultation in May 2024. She also received detailed written information from various civil society and academics from Switzerland, Canada and Australia, and inputs during several events in which she participated during the months of May and July 2024.

Besides, the Special Rapporteur held a virtual discussion with 10 Dutch law enforcement experts who participated in police operations related to Pro-Palestine solidarity protests in different universities and cities in the Netherlands. Furthermore, the Special Rapporteur held various meetings and bilateral conversations with government officials and parliamentarians.

⁶ www.ohchr.org/en/press-releases/2023/11/speaking-out-gaza-israel-must-be-allowed-un-expert

⁷ www.ohchr.org/en/statements/2024/02/israelopt-enabling-human-rights-defenders-and-peaceful-protests-vital-achievements

⁸ A/79/263

In total, the Special Rapporteur collected information during 15 meetings, with at least 150 participants from different sectors, from around 30 countries.

The following is a summary analysis of the key findings by the Special Rapporteur, concerning the pro-Palestine solidarity movement that has taken place in both private and public universities worldwide.⁹ This will be followed by a set of concrete recommendations by the Special Rapporteur to universities, to ensure they protect the rights to freedom of peaceful assembly, expression and association of all within their campuses, while expecting the resurgence of peaceful assemblies in the second semester of the year, in line with the growing movement and international attention on the issue, and anticipating commemoration mobilizations by both, Israeli and Palestinian solidarity groups in October.

Summary of main findings concerning the right to freedom of peaceful assembly in the context of University-based pro-Palestine solidarity protest movement

1. The university pro-Palestine solidarity protest movement has been robust, diverse, creative and innovative. The assemblies took on various forms, demonstrating the profound sensibility, civic responsibility, and creative potential of youth, despite facing severe restrictions, intimidation and threats. This reaffirms observations made also by the Special Rapporteur on human rights defenders, that youth and children's "activism and mobilization are at the forefront, and often the main driving force, of societal, economic and political change, (...) even with pervasive age-based 'discrimination'".¹⁰
2. While this movement has primarily been led by young students and coordinated by student associations, it garnered broad support from the academic community, including colleges, faculty, administrative staff, unions, parents, local communities, civil society organizations, and broader social movements. This illustrates that these student assemblies were part of a wider, broader social movement of mobilization, activism and solidarity with Palestinian people, which also has been seen online and on the streets of many cities around the world.
3. Predominantly the on-campus assemblies of the movement were peaceful, meaning that "they did not entail the use by participants of physical force against others that was likely to result in injury or death, or serious damage to property",¹¹ and even if there have been reports of some isolated incidents of violent behaviours by some of the participants, the assemblies were not characterised by a widespread violence required for a protest to be declared non-peaceful in its entirety. According to the international standards, disruption of daily activities and/or ordinary life, including pedestrian and/or vehicular movement, cannot be considered as act of violence and therefore do not remove the protection of these acts under the right to peaceful assembly.

⁹ Although the Special Rapporteur contacted and established dialogue with Jewish organizations, the predominant allegations received were related to restrictions on the right to freedom of peaceful assembly in the context of the pro-Palestinian movement on campuses, hence this is the focus of the document.

¹⁰ Mary Lawlor, 'We are not just the future': challenges faced by child and youth human rights defenders (A/HRC/55/50), par 1 and 3.

¹¹ General comment 37 (2020) on the right of peaceful assembly (article 21), CCPR/C/GC/37 (Hereinafter General Comment 37). It also establishes that the following actions cannot be considered as violence and are protected: i) mere pushing and shoving, ii) disruption of vehicular or pedestrian movement or daily activities (para 15), iii) non-violent collective civil disobedience or direct action campaigns (para 16), iv) "carrying by participants of objects that are or could be viewed as weapons or of protective equipment such as gas masks or helmets" which should be assessed on a case-by case basis (para 20).

4. The predominant messages of these assemblies have been legitimate calls in line with States obligations to prevent and address atrocity crimes, including genocide and apartheid, to protect human rights, including the right to self-determination, enshrined in the international human rights legal instruments; and have carried legitimate calls for ending of the Israel unlawful occupation of Palestinian territory as reaffirmed by the recently Advisory Opinion by the International Court of Justice (ICJ)¹², which also asserted the obligation of States “not to render aid or assistance in maintaining the situation created by the continued presence of the State of Israel in the Occupied Palestinian Territory”. Many of these calls, including of ceasing the provision or transfer of arms to Israel that may be used in the Occupied Palestinian Territory, have been continuously reiterated publicly by various UN experts¹³ as well as by the latest UN General Assembly Resolution calling for an end to the occupation of Palestine.¹⁴ The student solidarity movement has been at the heart of the global advocacy campaign contributing to these unprecedented initiatives undertaken by the international community towards protecting the rights and lives of Palestinians.
5. The student pro-Palestine solidarity movement has faced systematic and concerted violent attacks of various forms - physical, threat and intimidation, moral, reputational, administrative, criminalisation and symbolic- both online and offline, including unlawful surveillance, smear campaigns and doxing. These attacks came from a range of sources, including colleges leaders, other students, staff and faculty and the administration. While a few clashes between protesters and counter-protesters have been documented, there are many allegations of violent attacks against protests leaders and participants, by individuals opposing the protests from outside the universities. Reports of harassment include students being followed to their residences, verbally assaulted on the streets, and subjected to smear campaigns both on and off campuses.¹⁵ Additionally, in several countries, authorities and public officials at various levels, including mayors, governors, parliamentarians, members of cabinets and other political leaders, have used hostile rhetoric that contributed to stigmatizing students and their legitimate actions, and to the increased hostility and attacks they faced.
6. The Special Rapporteur found that “Protesters have been vilified and criminalized for using Palestinian symbols, such as flags and the keffiyeh (traditional scarf), and for slogans such as “from the river to the sea” (which advocates for freedom, human rights and dignity for all in Israel and the Occupied Palestinian Territory), or slogans written in Arabic, and for the use of the hijab. These actions have increased the hostile environment for pro-Palestinian expressions and activists”, and has increased racism and hatred.¹⁶ Allegations suggest that Jewish student supporters of or participating in the movement and encampments have also faced persecution and violence for their involvement. The Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression indicate that “Equating advocacy of Palestinian rights with terrorism or antisemitism is not only a disproportionate response, but may indicate an underlying institutional racism against Palestinians, violating fundamental human rights.”. Furthermore, general bans on Palestinian symbols violate the right to freedom of expression as these fail to meet the requirements of necessity and proportionality.¹⁷

¹² The ICJ declared Israel's occupation of Palestinian territory, encompassing the West Bank, including East Jerusalem, and the Gaza Strip, as unlawful under international law, in addition to the previous ruling by the ICJ ordering preventing acts of genocide against the Palestinians in Gaza. Calling for boycotts, divestment and sanctions is further protected under the right to freedom of expression.

¹³ See [https://www.ohchr.org/en/statements/2024/09/un-experts-warn-international-order-knives-edge-urge-states-comply-icj-advisory#:~:text=GENEVA%20\(18%20September%202024\)%20%E2%80%93,with%20most%20States%20failing%20to](https://www.ohchr.org/en/statements/2024/09/un-experts-warn-international-order-knives-edge-urge-states-comply-icj-advisory#:~:text=GENEVA%20(18%20September%202024)%20%E2%80%93,with%20most%20States%20failing%20to)

¹⁴ A/ES-10/L.31/Rev.1

¹⁵ At least in one city in the US, there have been reports of the presence of a small truck wandering around campuses displaying photos and names of students leading or participating in the Palestine solidarity protests.

¹⁶ Gina Romero, Special Rapporteur for the Rights to freedom of assembly and of association, “Protecting the rights to freedom of peaceful assembly and of association from stigmatization” (A/79/263), paragraphs 57 and 61.

¹⁷ A/79/319, para 72; for further details and guidance see also section VI of this report related to Protected and prohibited expression

7. Protesters have been treated unequally and subjected to excessive restrictions and harsh treatment due to their political stance and message, which reveals double standards. Responses by State and public authorities in various national, local and university contexts were very different; but, a general violation of the principle of content-neutrality of responding to peaceful assemblies and non-discrimination is identified. While, in many cases, demonstrations against Hamas' attack on Israel and actions of solidarity with victims and people living in Israel were allowed to proceed without interference, similar demonstrations showing solidarity with the Palestinians victims of atrocities, were met with violent repression, blanket bans of peaceful protests, and excessive sanctions. Arab and Middle Eastern student groups, as well as student's unions associations involved in the Palestinian solidary peaceful protests, have faced closures, funding cut or suspensions of their leaders, severely impacting the right to freedom of association in addition to other rights. It is worth noting that some universities respected pro-Palestinian campus activism and demonstrations without interference, however many imposed arbitrary restrictions, lacked transparency and objectivity in decision-making concerning handling of the protests, and failed to protect students and faculty members from violence, and at times the university administration appeared to have facilitated the violence against peaceful activists due to their actions or omissions. Often, appeals processes against restrictions and sanctions of student protesters were unavailable. Although the universities increased security, these seem to have been used to intimidate, surveil, and to discourage and suppress protests, but were unable to protect participants from counter-protesters and threats from external actors.
8. Campus regulations were frequently and arbitrarily changed,¹⁸ intentionally or unintentionally unduly restricting protesters rights, with some rules being revised hourly in extreme cases and lacking transparency. Building closures, including of libraries, during exam periods and the use of fire regulations, that allegedly were unjustified, aiming to disperse peaceful protest actions of occupations, were seen as forms of collective punishment, designed to turn students against protesters and hinder protest participation. These severely limited the right to peaceful assembly. According to the international standards, "given the typically expressive nature of assemblies, participants must as far as possible be enabled to conduct assemblies within sight and sound of their target audience".¹⁹
9. Universities employed three distinct approaches to engaging with the student movement: i) some established dialogue and coordination from the beginning, ii) other refrained from direct engagement and dialogue, but maintained limited communication channels, iii) other opted to ignore the existence and calls of the movement entirely. In cases where dialogue was sustained, even if substantial agreements were not reached, disciplinary measures and police intervention were minimal or unnecessary, de-escalating the situation.²⁰ Where agreements were reached, these often resulted in accepting some of the students' demands, and/or the dismantling of the camps or ending of the occupations.

¹⁸ Including sudden prohibitions of displaying Palestinian symbols (accepted previously without problem in all campus buildings), spontaneous assemblies, weekly changes of number of days requested for announcing a mobilization, restrictions on specific campus locations ('demonstrations areas'), the possibility of hanging posters on the walls, or to stick messages around campus.

¹⁹ General Comment 37, paragraph 22.

²⁰ In one case, harassment actions were carried out disguised as a dialogue: such as phone calls at 1 a.m. to advance negotiations.

- 10.** Some Universities facilitated and even called for and encouraged that law enforcement agencies suppress the peaceful protest and dismantle the encampments, which in certain cases led to excessive use of force against young peaceful protesters. Such actions have not only escalated the violence, but have deeply traumatised students and created an atmosphere of hostility and mistrust between the students and the administration, hampering the academic environment.
- 11.** The response of law enforcement varied significantly – across countries, cities, and even between different universities in the same city. In some locations, police refrained from enforcing restrictions or using force, opting instead to create ‘peace units’ to maintain open lines of communication and negotiations with protesters. Such measures have significantly de-escalated the tension and avoided the use of force. However, in other cases, there was disproportionate use of force,²¹ including the deployment of less-lethal weapons,²² arrests, preventive detention, and the use of undercover officers. In many countries,²³ students and faculty were arrested on charges such as trespassing, refusal to comply with police orders, failure to disperse, conspiracy to commit an unspecified crime, disturbance of peace, or hate-related offences. Some have faced criminal charges.
- 12.** Similar harsh responses were noted across various types of pro-Palestine on-campus protests. Riot police, bomb squads and anti-terrorism units were deployed in some instances, to control or disperse low-intensity gatherings such as silent vigils, illustrating the extent of the excessive and disproportionate use of force. In some European universities, there are disturbing allegations of private investigators being hired by university administration to surveil, including outside the campuses, and collect information on students involved in organizing the encampments, which has been deeply intimidating and had a chilling effect.
- 13.** Interviewees from multiple countries reported a significant increase in surveillance on campuses, including the installation of new cameras, facial recognition systems, and enhanced online monitoring, particularly of social media activities. There has been a lack of transparency on the type of data collected and how it is being used by the universities. In many cases, police and external actors photographed and filmed protesters, including through the use of drones. Allegations suggest that some universities were sharing personal data of students participating in the protest actions with law enforcement agencies and private companies, including with businesses offering job opportunities to the students. Additionally, reports indicated that in some cases police were feeding universities with intelligence gathered of students participating in Palestine solidarity protests off-campus. These actions not only violated the students right to privacy (protected under Article 17 of the ICCPR) but also jeopardizes the future career prospects of students participating in the solidarity protests, as data – including related to arrests of students – for their peaceful protest acts have been retained and shared with future employers. Students reported of receiving refusals of hiring them from the companies once they graduated due to their participation in the peaceful protest camps.

²¹ Several cases in at least four countries includes cases with encampment participants being hospitalized as a result of the forced used by law enforcement to dismantle the camps. In one case a bulldozer was used to bring down a barricade while students were sitting on the structure. In some cases, encampments and occupations were dismantled without prior warning, and students were left locked in buildings and classrooms.

²² Such less lethal weapons reportedly used by law enforcement for dispersing the student encampments include among others teasers, tear gas/ pepper spray, flash-bangs and rubber bullets.

²³ See for example communications: OTH 71/2024 and AL USA 12/2024 for specific information about the USA.

14. In addition to the restrictions and violent responses to peaceful protests, some universities have imposed severe and disproportionate retaliations on protesting students, including disciplinary measures such as suspensions, expulsions, and actions that prevented students from graduating. These have been described by students as designed to silence them through threatening their future. These sanctions have particularly affected international students, whose migrant status was jeopardized. In certain cases, university sanctions have weaponized access to housing and food services. Allegations have surfaced that some universities coerced students into agreements, such as mandatory community service or waiving their right to take legal actions against institution, in exchange for the ability to continue their studies or graduate. Similar reprisals have been reported against faculty and staff, including unjustified dismissals and premature contracts terminations, including unfounded accusation of anti-Semitism.

15. Both police repression, when applied, and university disciplinary sanctions have disproportionately targeted migrant students, students of specific ethnic groups, and student's leaders. Reports indicated selective targeting of Arab, Latinos and Afro-descendant students and faculty, as well as those engaged in academic research (including PHD students) related to the Nakba, racism towards Arab/Palestinians, social movements (particularly international solidarity), Israeli politics, and Middle East and North Africa studies. Allegations also point to the cancellation of events and academic activities led by Palestinian or Arab students, as well as by organizations discussing these topics.

16. A clear pattern of profiling has been observed in the enforcement of suspensions and other disciplinary actions, which contradicts the principle of non-discrimination. In some instances, the discrimination extended to police repression that hindered the access and the work of student journalist, legal observers, and protest monitors in Palestine solidarity demonstrations on campuses.

The situation surrounding protests and solidarity actions within university environments, coupled with institutional responses, reveals a potentially hostile environment for the exercise of the rights to freedom of peaceful assembly and association. This has also deeply affected the working conditions of campus staff who face harassment and persecution due to their support or participation in the Palestinian solidarity activism, leading to self-censorship and significant emotional and psychological distress, in addition to some facing disciplinary sanctions and loss of jobs. As a result, both academic freedom and labour rights are being undermined and violated.

Moreover, these actions threaten and discourage public participation and open discourse, severely impacting the rights to freedom of expression, particularly for Palestinian and Arab students in expressing their identity. This poses a profound threat to democratic systems and institutions, especially when young people are affected. It risks alienating an entire generation, damaging their participation and perception of their role in democratic processes. Universities must recognize that their responsibility extends beyond campus borders – their actions have the potential to shape political discourse, culture, civic education, and ultimately, the future sustainability of democracy, freedoms and human rights.

Throughout the world history, universities have been the sites of dissent and at the forefront of important movements. Student protests have played a vital historic role for advancing democracy and rights, including in the civil rights movement and for helping to bring an end to the apartheid in South Africa and fighting colonialism. Respecting and guaranteeing dissent is essential to ensure the universities remain spaces for free thought, speech and academic freedom.

Recommendations for universities, academic communities and other relevant actors

1. It is vital to publicly and unequivocally recognize the importance of youth engagement in public discourse and their contributions for human rights, dignity, peace, and justice. At a time when apathy and mistrust increasingly dominates policy-making spaces, and younger generations are often isolated and stigmatized based on perceived “disconnection from reality” or being “inexperienced”, the fact that hundreds of thousands of diverse students worldwide are exercising their academic and fundamental freedoms to advocate for collective change, to protect human rights and end atrocity crimes and promote peace, should be encouraged and facilitated, not condemned, silenced, repressed or criminalised. The Special Rapporteur reiterates previous calls by the mandate for ensuring the meaningful participation of children and youth in public debates that affect them, and for ensuring youth participation in peace-building and transition processes.²⁴
2. The support these movements receive from other segments of society reflect the critical intergenerational dialogue needed to confront humanity’s shared challenges. It is also worth reflecting on how we can unlock the potential and foster this kind of civic engagement among youth in more marginalized communities, where fewer privileges may exist, but the passion and determination to shape their future and the world around them are present.
3. It is crucial to immediately cease the stigmatization and hostilities that directly or indirectly silence members of the academic community and discourage the exercise of their rights to freedom of expression, peaceful assembly, and of association, among others. The Special Rapporteur reiterates that hate speech is unacceptable, and that specific incidents of hate speech should be properly addressed by targeting specific individuals or groups involved, applying the six-part threshold established by the Rabat Plan of Action on the prohibition of advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence. Imposing sweeping bans and restrictions on the whole assembly and movement is disproportionate and as such violates the right to freedom peaceful assembly.²⁵ Universities should review their internal regulations on hate speech and anti-Semitism and align them with international standards for the protection of freedom of expression, respecting that a critical political opinion, including expressions of political opposition to a government, or the pursuit of self-determination are protected under the right to freedom of expression.²⁶ It is advisable that this process be carried out by guaranteeing the participation of civil society and the academic community in all its diversity.

²⁴ A/78/246.

²⁵ Gina Romero, A/79/263, “Protecting the rights to freedom of peaceful assembly and of association from stigmatization”. <https://documents.un.org/doc/undoc/gen/n24/226/62/pdf/n2422662.pdf>

²⁶ General Comment 37, par 49.

4. States and public authorities must end the vilification of peaceful Pro-Palestinian solidarity protesters by labelling them as “supporters of terrorism”, for their legitimate demands for an end of the genocidal violence, apartheid and illegal occupation of Palestinian people. It is also essential to refrain from adopting any legislative reforms or administrative regulations that threaten to penalize students for participating in peaceful protests, such as by denying them access to loans or loans forgiveness, or deporting foreign students for the exercise of their right to freedom of peaceful assembly. Similarly, universities should not face limitations on accreditation or access to public funds based on their stance and response to protests, nor should any other undue restrictive measures be pursued against academic institutions. Political pressure on universities must end immediately. Such pressure, accompanied by public attacks on scholars and institutions, seriously affects university autonomy and academic freedom, as well as freedom of expression.²⁷
5. While the primary obligation to respect, protect and facilitate human rights rests with States, all actors -including universities and educational institutions (even if they are private-owned) - share the responsibility to respect and uphold human rights and fundamental freedoms. All academic institutions, public and private, must take proactive steps to create a safe and supporting environment for exercising the rights of peaceful assembly, association and expression. These responsibilities also apply to private academic institutions, in line with the UN Guiding Principles on Business and Human Rights, as these principles apply to “all business enterprises, both transnational and others, regardless of their size, sector, location, ownership and structure”.²⁸ Therefore, investors, as business actors, also have responsibility to respect and protect human rights, and must refrain from exerting pressure on universities to suppress pro-Palestinian student protests, including in connection to protest calls for divestment from companies linked to Israel and gross human rights and international law violations in occupied Palestine territory.
6. In universities located on private property, gatherings and peaceful protests are still protected under the right to freedom of peaceful assembly. While certain restrictions may be applied to safeguard the rights and interests of others property stakeholders, these must be assessed on a case-by-case basis. This evaluation should consider “whether the space is routinely publicly accessible, the nature and extent of the potential interference caused, whether those holding rights in the property approve of such use, whether the ownership of the space is contested through the gathering and whether participants have other reasonable means to achieve the purpose of the assembly, in accordance with the sight and sound principle”.²⁹ This underscores the importance of refraining from imposing blanket restrictions. The use of “trespassing” offences for peaceful assemblies carried out on the private property of academic institutions should be assessed strictly against the necessity and proportionality principles. Criminal charges for non-violent protest activity are disproportionate.

²⁷ See a Statement by the Special Rapporteur on the right to education in relation to the United States, which applies equally to any other State: “Statement by the Special Rapporteur on the right to education, Ms. Farida Shaheed on her visit to the United States of America, 29 April – 10 May 2024” <https://www.ohchr.org/sites/default/files/documents/issues/education/statements/20240510-stm-eom-sr-education-usa.pdf>

²⁸ UN Guiding Principles on Business and Human Rights, Guiding Principles.

²⁹ General Comment 37, pars 57 and 73.

7. Academic institutions should actively facilitate and protect peaceful assemblies, including by prioritising negotiation and mediation where necessary. Dialogue with organisers and participants must be prioritised and actively pursued from the start throughout the assembly cycle, ensuring it is free from stigmatization, coercion or threats from any party, especially threats of academic or disciplinary sanctions for the exercise of fundamental freedoms must not be imposed. If agreements are reached, it is crucial that university and other relevant authority honour them and transparently communicate any delays or necessary changes in their implementation.
8. Academic institutions should ensure that their regulations are in line with the international standards to promote, protect and facilitate the rights to freedom of peaceful assembly, of expression and of association; and ensure that restrictions when necessary are timely, clearly and transparently disseminated, with an option of appeal. A focal point within the administration should be available to receive and adequately respond to concerns of protesters, including ensuring there is an independent mechanism for handling and responding to complaints of violations, threats and abuse, including of stigmatization and hate speech against protesters, providing protection to all without discrimination. All academic institutions should establish, or review existing, mechanisms for participatory evaluation of internal regulations concerning peaceful assemblies on campuses. These evaluation mechanisms should be triggered when specific assemblies require analysis and especially with the view to prevent and protect participants from undue restrictions of their rights and violations; and should ensure the meaningful participation of the academic community, including student groups. This process must guarantee open, transparent, and inclusive consultation, particularly with minority groups affected.
9. Universities and other academic institutions must refrain from and cease any surveillance against students and staff for expressing their views or participating in peaceful assemblies, and review and adjust their use of digital technologies to ensure these are not used for surveillance or intimidation of students or staff exercising their fundamental freedoms. The collection and use of information and data of students and scholars participating in assemblies, including by monitoring social media, must not result in suppressing rights, violate the right to privacy, or create a chilling effect. The “way in which data are collected, shared, retained and accessed, must strictly conform to applicable international standards, including on the right to privacy, and may never be aimed at intimidating or harassing participants or would-be participants in assemblies. Independent and transparent scrutiny and oversight must be exercised over the decision to collect the personal information and data of those engaged in peaceful assemblies and over its sharing or retention”.³⁰ This applies to law enforcement authorities but should be also ensured by the university administration, including private universities, as part of their duty to protect human rights.

³⁰ General comment 37, paras 61 and 62. Also see the “Principled-based guidance for the human-rights compliant use of digital technologies in the context of peaceful protests”, available here <https://www.ohchr.org/sites/default/files/2024-03/Toolkit-law-enforcement-Component-on-Digital-Technologies.pdf>

- 10.** As a general rule, peaceful assemblies should be facilitated with no resort to the use of force; the use of force must be exceptional, after all non-violent means have been exhausted, and must comply with the requirements of necessity, proportionality and precaution. State is ultimately responsible for law enforcement during an assembly,³¹ and universities should avoid tasking private security providers with policing of assemblies as they lack the training sufficient for facilitating peaceful assemblies and may cause confusion and undermine accountability for violations against protesters. Law enforcement agencies should ensure that they prioritise tactics of de-escalation at all times, including through negotiations and communication with all involved parties (including protesters, counter-protesters, staff and university administration) to avoid the use of force; dialogue units should be at the fore of dealing with peaceful protests and refrain from the use of disproportionate equipment, including protective gear, which is also stigmatizing and risk intimidating and escalating tensions leading to violence.³²
- 11.** As reiterated above, acts of sporadic violence or other punishable acts committed by others within the assembly, do not deprive peaceful individuals of their right to freedom of peaceful assembly. It is important that Universities and academic institutions understand that the following acts or expressions cannot be deemed as violent acts and cannot be used to justify banning, suppression, or dispersal of peaceful protest³³:
- a.** The pursuit of contentious ideas or goals³⁴ and the use of expressions that can be seen as offensive, shocking, impacting, indecent, scandalous or eccentric.
 - b.** The use of flags, uniforms, signs and banners, even if such symbols are reminders of a painful past.³⁵
 - c.** The disruption created, and its consequences. Assemblies are “a legitimate use of public and other spaces” and that protests by their very nature may entail a “certain level of disruption to ordinary life”, and according to the international standards such disruptions must be accommodated, unless they impose a disproportionate burden.³⁶ It is recommended that the assessment of when a burden due to disruption created by the peaceful assembly could be considered disproportionate, is done with the meaningful and active participation of the diverse staff of the academic institution, including protest organisers, minority groups and students that could be affected by the decision to restrict or disperse the peaceful assembly. All least intrusive measures should be explored, including negotiations, and ensure a decision of a dispersal is only a measure of last resort.
 - d.** Damage of property and any physical asset that do not effectively destroy it (making it lose its form to the point that its use is impeded), render it useless (making it useless for the purposes inherent to it, even if it has not been destroyed), or disappear it (the object loses its existence).³⁷

³¹ General Comment 37, para 93.

³² See UN Model Protocol for Law Enforcement Officials to Promote and Protect Human Rights in the Context of Peaceful Protests, A/HRC/55/60.

³³ In exceptional cases, where such expressions or symbols are “directly and predominantly associated with incitement to discrimination, hostility or violence, appropriate restrictions should apply” (General Comment 37, para 50-51), however such restrictions must be targeted at the individual perpetrators not the assembly as a whole, and be in line with the six-part threshold of the Rabat Plan of Action.

³⁴ General comment 37, para 7.

³⁵ As provided by General Comment 37 (par 51). In exceptional cases, where such symbols are directly and predominantly associated with incitement to discrimination, hostility or violence, appropriate restrictions should apply.

³⁶ General Comment 37, paras 7, 31, 47.

³⁷ CSJ. AP 5278-2015. 14 sep. 2015, rad. 35780 idem attorney general

- e. The use of face coverings or other disguises and tools, which are otherwise considered legitimate to ensure people can participate anonymously, or may be part of the expressive element of a peaceful assembly or serve to counter reprisals or to protect privacy, including in the context of new surveillance technologies.³⁸
12. Universities and other academic institutions must ensure transparent and independent investigation into human rights violations that occurred in the context of the camps and other peaceful assemblies, including evaluating the role of the administration in contributing to these violations by their decisions, actions or omissions. Any sanctions unduly imposed on students and staff should be reversed, and institutions, including private universities, must establish processes for internal remedy and accountability, acknowledgment of the impact of their decisions or omissions, reparations and guarantees of non-repetition. Remedial mechanisms should be adequate and responsive to the diverse experiences and needs of rights holders; ensuring that remedies are accessible and that the affected students and staff are not victimized when seeking remedies. Private universities, under the Guiding Principles on Business and Human Rights, also should ensure effective remedies for the violations against peaceful protesters, which should include “preventive, redressive and deterrent remedies” for each human rights abuse.³⁹

A significant number of academic institutions, although pledging publicly that they respect the right to peaceful assembly on campuses, demonstrated limited understanding of their role and capacity to facilitate peaceful protests, including occupations and camps, in compliance with the international standards on the right to peaceful assembly. To ensure compliance with the international human rights standards and to guarantee respect and protection of the right to peaceful assembly, public and private academic institutions, should dully implement through their policies and actions the following key requirements:

- a. Peaceful campus assemblies should be guaranteed and protected wherever they take place (outdoors, indoors, online; in public and private spaces; or a combination thereof), and regardless of their forms (demonstrations, protests, meetings, processions, rallies, sit-ins, candlelit vigils and flash mobs, civil disobedience campaigns, camps, etc.), whether they are stationary or mobile.⁴⁰ Counter-protests should be facilitated, respecting the sight and sound principle.
- b. All actors must abstain from unduly interfering with the rights to freedom of peaceful assembly and of association, and should take all appropriate measures to facilitate and protect these rights. This means also ensuring that these rights are enjoyed equally, freely and safely by everyone, without discrimination on the basis of race, colour, sex, language, religion, political or other opinion, national or social origin, and age.
- c. Particular efforts must be made to ensure the equal and effective facilitation and protection of the right of peaceful assembly of individuals who are members of groups that are or have been subjected to discrimination, or that may face particular challenges in participating in assemblies,⁴¹ such as foreign students vulnerable to visa cancellation policies.

³⁸ General Comment 37, para 60.

³⁹ See Report of the Working Group on the issue of human rights and transnational corporations and other business enterprises, A/72/162, paras 38-42.

⁴⁰ General Comment 37.

⁴¹ General Comment 37, para 25.

- **d.** The facilitation and response to assemblies, including all types of protests and encampments, must be content neutral, and respect the principle of non-discrimination.
- **e.** A regime of notification should be prioritised, and spontaneous assemblies must be possible. If for the sake of coordinating actions to guarantee the right to education, a regime of notification has been established, participants in spontaneous peaceful protests should not be sanctioned or penalised.
- **f.** Any restriction on the exercise of the right to freedom of peaceful assembly must “not be discriminatory, impair the essence of the right, or be aimed at discouraging participation in assemblies or causing a chilling effect”.⁴² Restrictions on the right⁴³ must comply with the requirements of:
 - i. Legality:** universities should ensure that any restrictions are written, and that the administrative regulations related to assemblies on campuses are precise, respectful of the law and in compliance with the international standards of human rights. Universities are encouraged to create diverse multi stakeholder processes to review and amend accordingly the current normative framework to ensure its compliance with the right to peaceful assembly and related rights.
 - ii. Necessity:** need to ensure that any restrictions are necessary in a democratic society, considering the social value of the protests and taking into account its contribution to democracy and ensuring pluralistic society, as well as the opportunity for students to learn, in practice, the exercise of their rights, as well as its relation with the rule of law and human rights, without prejudice based on stigmatization. Such restrictions must be the least intrusive.
 - iii. Proportionality:** must be proportionate for achieving the legitimate objective, and the nature and the impact of the harmful effect must be weighed against the resulting benefit. This includes the impact of the restrictions on the rights of academic freedom, expression and freedom of peaceful assembly.
- **g.** Restrictions, unless justified as necessary on a case-by-cases basis, should not be imposed on elements of:⁴⁴
 - i.** The time of assemblies, as “participants must have sufficient opportunity to manifest their views or to pursue their other purposes effectively”,
 - ii.** Their frequency, as “the timing, duration or frequency of a demonstration may, play a central role in achieving its objective. However, the cumulative impact of sustained gatherings may be weighed in a proportionality assessment of a restriction”,
 - iii.** The number of participants and their place, as “peaceful assemblies may in principle be conducted in all spaces to which the public has access or should have access (...) they should not be relegated to remote areas where they cannot effectively capture the attention of those who are being addressed or the general public”.
 - iv.** The equipment used, as “participants should be left to determine whether they want to use posters, megaphones, musical instruments or other technical means, such as projection equipment, to convey their message. Assemblies may entail the temporary erection of structures, including sound systems, to reach their audience and achieve their purpose”.

⁴² General Comment 37, para 36.

⁴³ Under article 21 of the ICCPR, restrictions of the right to freedom of peaceful assembly may be permitted only on the following legitimate grounds: the interests of national security; public safety; public order (ordre public); the protection of public health or morals; or the protection of the rights and freedoms of others. This is an exhaustive list and restrictions on other grounds not included in this list are not justified. The onus is on the authorities to justify any restrictions, which should be on case-by-case basis.

⁴⁴ General Comment 37, paras 53, 54, 56, 59, 58.

- **h.** The prohibition of a specific assembly or its dispersal may be considered only as a measure of last resort; and after applying the least intrusive measures, and fostering open, secure and transparent dialogue among the parties involved.
- **i.** “Where sanctions are imposed on organizers of or participants in a peaceful assembly for their unlawful conduct, such sanctions must be proportionate, non-discriminatory in nature and must not be based on ambiguous or overbroadly defined offences”.⁴⁵
- **j.** The right to freedom of assembly includes and protects the right to monitor, as media workers (including journalist students), monitors and other observers, lawyers, human rights defenders and medical personnel contribute to the full enjoyment of the right. They should be protected and their work facilitated, even if the protest is dispersed.⁴⁶ Actors, including students carrying out such functions in relation to the on-campus protests, must not be prohibited from, or face undue restrictions, reprisals or other harassment, for conducting these activities, including with respect to monitoring the actions of law enforcement officials when called to disperse the protest; and their equipment must not be confiscated or damaged.⁴⁷

Given the pressing public need addressed by the student protests in the face of the mounting atrocity crimes against the Palestinians, as most recently reaffirmed by the ICJ rulings and the latest UN resolution, authorities and academic institutions should seek ways to facilitate these protests with higher level of tolerance.

Universities and other educational institutions have an important window of opportunity to learn from the experiences of the University-Based Pro-Palestine Solidarity movement. It is vital to create healthy and thriving campus environments for all students, guaranteeing viewpoint diversity, to foster more open discussions and constructive dialogue on controversial issues, counter stigmatizing narratives, contest echo chambers that impede the genuine interchange of ideas and “reduce the deleterious effects of ideological extremism”⁴⁸. Universities need to foster a culture of open inquiry and respectful dialogue, that ensure the survival of democratic institutions and of human rights and freedoms.

Quoting the students that the discourse insisting that “protest is not an academic activity, therefore needs to be exercised off campus”, is neglecting the possibility to recognize that the exercise of the rights to freedom of expression, peaceful assembly and association are per se essential actions of learning skills for the citizenry, and in sum for life itself.



⁴⁵ General Comment 37, para 67.

⁴⁶ See General Comment 37, para 30, and Model Protocol, A/HRC/55/60, para 17.

⁴⁷ Ibid.

⁴⁸ Heterodox academy, “Discussing Israeli-Palestinian Conflict on Campus: Political Affiliation, Ideology, and Institutional Support for Viewpoint Diversity”, <https://heterodoxacademy.org/reports/discussing-israeli-palestinian-conflict-on-campus-political-affiliation-ideology-and-institutional-support-for-viewpoint-diversity/>

Open letter to the Vice Chancellor of the University of Cambridge

Dear Vice-Chancellor,

We are writing to express our grave concern over the University's application to the High Court for an injunction aiming to prevent "trespassing" at Old Schools, Senate House, Senate House Lawn and Greenwich House through a court order threatening members of the University community and others with imprisonment, fines or the seizure of their assets for taking part in protests or direct action related to "the Palestine-Israel conflict" either on this land, or on the street outside.

We note that the application to the court is made in the name of the "Chancellor, Masters and Scholars of the University of Cambridge" and wish to state publicly and clearly that you are not acting in our name in preparing such an assault on freedom of expression. Rather, this injunction runs contrary to the collective rights and interests of the University community as a whole to debate, assemble and protest in order to hold those in authority to account.

In addition, the creation of special repressive powers targeted at protests related to the "Palestine-Israel conflict" is inherently discriminatory and unfair, and will disproportionately affect Palestinian and pro-Palestinian students and staff. The fact that you are seeking an injunction which will be in force until 2030, two years after current first year undergraduates have completed their degrees, threatens the rights of future cohorts of students to act in accordance with their beliefs.

We wish to remind you that the demands raised by students in solidarity with the Palestinian people have wide support from members of the University community. These include thousands of staff, students and alumni who have signed [public statements](#) in support of the demands of the encampment for Palestine and hundreds who have regularly taken part in protests in these exact locations as part of an ongoing campaign calling on the University to divest from companies and institutions complicit in violations of international law and crimes against humanity in Gaza and elsewhere.

Yet under the terms of the injunction as drafted by your administrators, the presence of even a small gathering outside Old Schools or Senate House in order to hand in a petition might be considered in breach of the court order if it "slowed down" access to the land in question. If a graduating student decided to hold up a Palestinian flag or revealed a placard during a Degree Congregation they could be sent to jail or face the seizure of their assets.

This kind of authoritarian reflex has no place in the governance of a University, which by its nature must be a space where dissenting opinions can be expressed without fear of heavy-handed repression. The freedom to question the decisions of the powerful and challenge injustice is an essential component of academic freedom - without it, the Congregations you claim to be protecting from "disruption" and "trespassers" risk becoming a meaningless charade.

We call on you to withdraw this injunction and reaffirm the University's commitment to protect the freedom of speech and assembly of its members.

A published copy of this letter can be found here:
<https://cambridgeunistaff4palestine.substack.com/p/open-letter-on-the-university-of>

This copy includes the names of all signatories, including those who opted to keep their signature private.

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