

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
FOLDER 2**

**INDEX FOR HEARING ON 19 MARCH
2025**

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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 - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>
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.

1032

SB2 PDF PAGE 4

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.

1033

SB2 PDF PAGE 5

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.

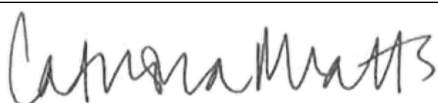
No

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



- 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

SB2 PDF PAGE 7

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

CLAIM NO: KB-2025-000497

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

The CHANCELLOR, MASTERS, AND SCHOLARS of the UNIVERSITY OF CAMBRIDGE
Claimant

-and-

PERSONS UNKNOWN

Defendant

-and-

(1) The EUROPEAN LEGAL SUPPORT CENTRE

(2) NATIONAL COUNCIL FOR CIVIL LIBERTIES

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 hearing of the Claimant's Application on 27 February 2025

AND UPON the judgment of Fordham J dated 27 February 2025

AND UPON the listing of the Claimant's Application for further hearing on 19 March 2025

AND UPON the application by the Claimant dated 13 March 2025 to vary the Claimant's Application

AND UPON reading the application of the National Council for Civil Liberties ("Liberty") for permission to intervene in the above proceedings for the purposes of the further hearing on 19 March 2025, and the accompanying witness statement of Katy Watts dated 14 March 2025

IT IS ORDERED:

SB2 PDF PAGE 9

1. Liberty is joined to Claim No KB-2025-00497 as an Intervener.
2. Liberty is permitted to file written submissions (not exceeding 10 pages), and to make oral submissions at the hearing on 19 March 2025.
3. Liberty to file its written submissions by 10am on 18 March 2025.

Dated this [] day of [] 2025

Witness: Katy Watts
Party: Proposed Intervener
Statement number: 1
Dated: 14 March 2025
KB-2025-000497

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

The CHANCELLOR, MASTERS, AND SCHOLARS of the UNIVERSITY OF CAMBRIDGE
Claimant

-and-

PERSONS UNKNOWN

Defendant

-and-

The EUROPEAN LEGAL SUPPORT CENTRE

Intervener

WITNESS STATEMENT OF

KATY WATTS

I, **KATY WATTS**, Solicitor at the National Council for Civil Liberties ("**Liberty**") 26 – 30 Strutton Ground, London, SW1P 2HR, WILL SAY AS FOLLOWS:

1. I am a solicitor employed by Liberty. I am instructed to act in-house for Liberty in its application for permission to intervene in these proceedings.
2. Save where otherwise indicated, the facts set out in this witness statement are within my own knowledge. Where facts are not directly within my own knowledge, I have

indicated their source and they are true to the best of my knowledge and belief. I am duly authorised to make this witness statement for Liberty.

3. The purpose of this statement is to explain Liberty's interest in in these proceedings, and to explain the steps that Liberty has taken to date to progress its application for permission to intervene.

Background to Liberty's work on protest rights

4. Liberty is a cross-party, non-party membership and campaigning organisation in the UK.¹ Liberty's mission is to "advance measures and take such steps as it shall deem necessary for the defence and extension of civil liberties and human rights in the United Kingdom and the rights and freedoms recognised by international law." This includes, in particular, striving to ensure and safeguard the right to freedom of peaceful assembly and association.²
5. Liberty was formed in 1934 by a journalist, Ronald Kidd, who was present in Trafalgar Square in 1932 when the police clashed with the "*hunger marchers*". Liberty's founders gathered to arrange for legal observers to check police conduct during the imminent arrival of a further large Hunger March in London.³ In a letter, published in the *Manchester Guardian* on 22nd February 1934, the founding members of Liberty spoke out against the "*general and alarming tendency to encroach on the liberty of the citizen.*" They vowed to protect the right to peaceful dissent and the spirit of British freedom.
6. Since its founding, protecting the right to protest has been one of the key focuses of Liberty's work. Liberty currently does so in two ways: (i) through policy work, by providing detailed briefings to Parliamentarians in respect of the impact on protest rights of recent legislation and participating in public consultations about public protest; and (ii) through legal work, by acting in our own name and for external clients in judicial review litigation concerning protest rights, and by intervening in cases which raise legal issues concerning the right to protest.

¹ It is also a not-for-profit company (no. 03260840) limited by guarantee.

² See 2.1 and 2.2.8 of Liberty's Constitution: accessible at <https://www.libertyhumanrights.org.uk/wp-content/uploads/2023/03/Liberty-Constitution-and-Rules-with-amendments-proposed-in-2023.pdf> .

³ Cox, B., *Civil Liberties in Britain* (1975), Penguin.

Liberty’s legal work on protest

7. Since its foundation, Liberty has taken a particular interest in protecting peaceful protest. It led a public campaign against the heavy sentencing of the leaders of the miners’ strike at Harworth Colliery in 1937; investigated police behaviour at demonstrations organised by the Campaign for Nuclear Disarmament and the Committee of 100 in 1960; upheld the right to strike and to campaign by miners in 1985; and provided legal support in a number of protest-related legal cases, including: *Kent v Commissioner of Police for the Metropolis*, *Times* May 15, 1981, *DPP v Jones (Margaret)* [1999] 2 AC 240, and challenges brought by the Campaign for Climate Change (March 2015) and Chris Packham’s Walk for Wildlife (September 2018).
8. More recently, Liberty has brought judicial review proceedings challenging regulations which amend the definition of ‘serious disruption’ for the purpose of imposing conditions on public assemblies and processions in *Liberty v Secretary of State for the Home Department* [2024] EWHC 1181 (Admin).⁴
9. Liberty has also been granted permission to intervene in multiple cases that have clarified the law relating to protest. These cases include an appeal against sentence brought by anti-fracking campaigners⁵ and an appeal brought by convicted persons who took direct action to stop a forced deportation flight.⁶ Liberty was also granted permission to intervene in the referral on a point of law made by the Attorney General in relation to the acquittal of the protesters who toppled the statue of Edward Colston in Bristol.⁷

Liberty’s work on persons unknown injunctions

10. Liberty has intervened in a number of cases concerning the use of “persons unknown” injunctions. Liberty intervened the case of *Bromley Borough Council v Persons Unknown* [2020] EWCA Civ 12, on the use of persons unknown injunctions in the context of Gypsy, Roma and Traveller encampments. Liberty also intervened in the Supreme Court appeal in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45 (“*Wolverhampton*”) regarding the impact of persons unknown injunctions on

⁴ Judgment of the Court of Appeal in the Secretary of State’s appeal is awaited.

⁵ *R v Roberts (Richard)* [2019] 1 WLR 2577.

⁶ *R v Thacker (Edward)* [2021] 2 WLR 1087.

⁷ *Attorney General’s Reference on a Point Of Law (No.1 of 2022)* [2022] EWCA Crim 1259

protest. On the basis of its intervention in *Wolverhampton*, Liberty was invited by Mr Justice Nicklin to make written submissions in *MBR Acres Limited v John Curtin and Persons Unknown* [2025] EWHC 331 (KB) addressing the principles governing the definition of persons unknown in protest injunctions.

11. In December 2024, Liberty submitted written submissions to the Law Commission in respect of its consultation on reform of the law of contempt of court. Its submissions focused on the use of committal proceedings against individuals in breach of persons unknown injunctions in the protest context.

Steps taken in these proceedings

12. Liberty first became aware of these proceedings on 25 February 2025, when it was contacted by the University and College Union in respect of a statement in relation to the Claimant's application for an extremely broad injunction against persons unknown. On the same day, I attended a meeting with the European Legal Support Centre ("ELSC"), who informed me of its intention to apply for permission to intervene, and to seek an adjournment of the hearing listed for 27 February 2025.
13. On 26 February 2025 I wrote to the Court on behalf of Liberty, expressing concerns in relation to the Claimant's application for an extremely broad persons unknown injunction. Liberty also expressed support for an adjournment of the hearing, in order to allow any unidentified defendants to participate in the proceedings and/or time for the ELSC and any other parties with an interest in the proceedings to apply to participate.
14. On 27 February 2025, the ELSC informed me that it had been granted permission to intervene in the proceedings. ELSC also informed me that Court had made an interim injunction covering 28 February to 1 March 2025, and that a further hearing was likely to be listed in the week of 17 March 2025.
15. On 4 March 2025, I met the ELSC and discussed the merits of an application by Liberty for permission to intervene in the proceedings. I began to consider areas where Liberty might be of assistance and started making enquiries to identify suitable counsel on 4 March 2025. On 10 March 2025, I became aware that a hearing had been listed for 19 March 2025. Given the short time frame, it took some time to find counsel with availability, and on 11 March 2025 I instructed a counsel team.

16. On 11 March 2025 I wrote to the Court to indicate that Liberty intended to apply for permission to intervene, and that it was necessary for Liberty to liaise further with ELSC before being in a position to make that application. Liberty was (and is) mindful of the need to avoid duplication of the work already being done by ELSC as the existing intervenor and would only apply to intervene if it was satisfied that it could usefully add value. The ELSC informed Liberty that the Claimant had indicated an intention shortly to circulate a revised draft order. I therefore considered that Liberty should consider the Claimant's revised order, before taking the final decision on whether to apply to intervene.
17. On 13 March the Claimant served the revised draft order and an application to amend the Claim Form and Particulars of Claim. Having considered that application, Liberty notes that the Claimant is inviting the Court to make another injunction in extremely broad terms with the Defendants solely being defined as "Persons Unknown" (contrary to the draft order initially filed) and the prohibited conduct also being defined in broad terms. It is therefore clear that the principles governing the drafting of a "Persons Unknown" newcomer injunction, particularly in protest cases, will be front and centre at the hearing on 19 March 2025.
18. Liberty considers that it can add considerable value on this subject given its expertise in the issues before the Court (including its earlier intervention in *MBR Acres*, noted above). Fordham J recognised the appropriateness of hearing from persons representing the interests of defendants in applications such as the present in his judgment dated 27 February 2025, at paragraph 5 (citing the Supreme Court's judgment in *Wolverhampton CC v London Gypsies and Travellers* [2024] AC 983 at paragraphs 176 and 226 in particular). The position is *a fortiori* in circumstances where the Claimant, by its amendment application, is seeking an injunction in terms which would be addressed to the world at large as opposed to the more limited category of defendants which would have been captured by the order in the terms originally sought.
19. Liberty seeks permission to file written submissions not exceeding 10 pages by 10am on Tuesday 18 March 2025 (which aligns with the deadline for skeleton arguments filed in advance of substantial applications in the KBD). Given the speed with which these proceedings have progressed and the fact that the amended draft order was only received yesterday, Liberty is not in a position to file its intended written

submissions in draft with this application to intervene. However, Liberty's intention is for these written submissions to address the principles governing the specificity with which "Persons Unknown" injunctions should be drafted, particularly in protest cases.

20. Liberty also seeks permission to make short oral submissions at the hearing on Wednesday. Liberty envisages making very short submissions following those made by the ELSC (again, tailored so as to avoid duplication) and will seek to cooperate with the parties on agreeing an appropriate timetable for the hearing.

21. Without waiving privilege over these conversations, I am satisfied from having liaised closely with ELSC's legal team that the intended scope of Liberty's intervention would not be duplicative of submissions that they intend to make. Liberty would of course continue to keep this under review and liaise closely with the ELSC going forward.

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.

Name: Katy Watts

Role: Solicitor, Liberty

Signed: 

Dated: 14 March 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

**FOURTH 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 fourth 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.
- 4 There is now produced and shown to me a bundle of documents marked “ER4” to which I refer to in this witness statement. References to page numbers are to pages of “ER4”.

5 I make this witness statement in response to the statement dated 12 March 2025 (filed by the Intervener) given by Jason Scott-Warren, who raises concerns about due process in bringing these proceedings.

Background

6 The Council comprises the Chancellor (who does not usually attend), the Vice-Chancellor (who generally chairs), nineteen elected members and four external members, one of whom chairs the Audit Committee. As Registrar, I act as Secretary of the Council, as well as being head of the UAS (as defined in my previous statements) and Secretary to a number of other committees.

7 The Council has the authority to take legal advice, retain solicitors, and bring, defend, or conduct legal proceedings on behalf of the University as they may think necessary or desirable in the interests of the University (see at page 1 the Regulations for the Council, "Legal Powers", contained at page 118 of the University's Statutes and Ordinances).

8 As Professor Scott-Warren says, the University Council is the principal executive and policy-making body of the University. However, certain powers are delegated to the Registrar, as I further explain below.

9 Whilst Professor Scott-Warren is one of the elected members of the Council, he is not authorised to speak on behalf of the Council (as confirmed by paragraph 6h of the Code of Practice for members of the Council which can be found at pages 60 – 62). As far as I am aware, Professor Scott-Warren has also not taken formal steps before now to challenge this action other than voicing his objection in a Council meeting where his was not the majority view (as explained further below). I note he is also a signatory to the open letter to the Vice Chancellor (which I referred to in paragraph 13 of my second witness statement and a final version was hand delivered to The Old Schools on the evening of 11 March 2025, which can now be found at pages 63-90).

10 I am disappointed that Professor Scott-Warren has publicly challenged the actions of the University in relation to these proceedings given that, as a Council member,

Professor Scott-Warren is one of the University's charity trustees and he could have raised the concerns which he has mentioned in his statement with his co-trustees which, as mentioned above, he has not to my knowledge done. However, I am not surprised given he has previously been publicly vocal about University matters and actively involved in protest (see for example the articles at pages 2 - 30).

Council meeting on 27 January 2025

- 11 Professor Scott-Warren refers to the Council meeting on 27 January 2025. At that meeting, I summarised the occupations of Greenwich House and Senate House Yard during the Michaelmas term of 2024 and the legal action the University had taken in relation to Greenwich House. I also updated the Council on the legal action the University was considering taking to protect the University from future unlawful protests.
- 12 In particular, I said at that Council meeting that we were looking at preventative actions to ensure that our students could graduate as normal (i.e. in Senate House) and the University staff could continue to work in its administrative buildings. I explained that potential actions included applying to the High Court for a precautionary injunction to prevent future acts of trespass from taking place at the Senate House and Senate House Yard, Greenwich House and The Old Schools, all areas that had been targeted by groups in 2024 and which were likely to remain targets for similar demonstrations.
- 13 Whilst I acknowledge questions were asked at the Council meeting about the precautionary injunction, I was not instructed by the Council to desist from pursuing this action. We have had prevailing support for taking this action from those in the Council as well as backing from those in the wider University community who also wish to see the Congregations protected.
- 14 The minutes of the Council meeting where this matter was discussed can be found at page 31 (these were approved at the Council meeting on 10 February 2025).

- 15 I subsequently confirmed in my public statement of 3 February 2025 that the University was exploring legal options that would protect certain limited areas of the University (the full statement can be found at page 177 of ER1).
- 16 Following the Council meeting, on 7 February 2025, a final decision was made to bring the proceedings, as set out in paragraphs 122 – 126 of my first statement.
- 17 I was not at the Council meeting on 10 February 2025 because of illness, but I have consulted those who were present and I understand that nothing was said at that meeting about the proceedings.

Authority to undertake these legal proceedings

- 18 Prior to issuing these proceedings, and also in the context of issuing proceedings in relation to the occupation of Greenwich House in November and December 2024, I carefully considered my authority to conduct legal proceedings on behalf of the University, and took legal advice from David Parsons, Director of the University's Legal Services Division. Based on this, I consider it is clear that I do have such authority delegated to me by the Council:

18.1 I attach at pages 32 - 57 the University's Statutes and Ordinances, Chapter XIII (Finance and Property) ("Financial Regulations"), which records at paragraph 22.1 the power delegated to the Registry to conduct legal proceedings.

18.2 Regulation 34.1 of the Financial Regulations also provides that "*the Council hereby gives all delegations and directions contemplated by the Financial Regulations*".

18.3 The following is recorded in the University Reporter's Notice dated 7 December 1998 (a copy of which taken from the University Report website can be found at pages 58 and 59):

"1. ... it has been settled practice for many years for the principal officers to undertake legal proceedings, acting as delegates of the Council, and that there is no impropriety in such delegation.

2. While it would be open to them to do so, the Council do not propose to withdraw the authority exercised by their principal officers in this way. They agree with the point made by Professor Mellor that the good order and management of the University depend on such arrangements and would be prejudiced if the officers' ability to act in individual cases, particularly those involving matters which are personally sensitive for individuals, required the specific authority of the Council.

3. The Council wish to make clear that officers on the staff of the Old Schools have customarily reported to the Council any significant legal matter affecting the University. That they have not advised the Council of every legal matter reflects the enormous range of legal advice and action in which an organization as large and complex as the University inevitably finds itself involved. However, to ensure that the officers have a proper framework within which to act, the Council approved new procedures during 1997-98 under which responsibility for these matters is exercised through the Registry, reporting to the Executive Committee, which is a statutory committee of the Council (Statute A, V)."

19 In conducting these legal proceedings, I had the added support arising from the Vice-Chancellor approving the commencement of proceedings.

20 I did not therefore need to seek the consent of the Council to these proceedings, nor did I seek this at the Council meeting on 27 January 2025. However, we did raise the matter with the Council at this meeting to give members the opportunity to discuss it so that, had they so wished, they could have decided that I should not pursue this action.


21 I would also like to respond to a couple of other points raised in Professor Scott-Warren's statement:

21.1 In paragraph 5 of his statement, Professor Scott-Warren says his email about the likely cost of any legal action went unanswered. On 11 March 2025 at

6.32am, and prior to Professor Scott-Warren making his statement, I emailed Professor Scott-Warren to say that I would update the Council at its meeting on 24 March 2025 with this information. I have received no response.

21.2 At paragraph 5, Professor Scott-Warren says "*I was informed that the University had no intention of jailing its own students*". I do not remember a statement in those exact terms being made although I do remember a discussion at the Council meeting about 'criminalising students'. If an injunction is granted and breached by a student (or any individual), then the University would carefully consider the circumstances and whether it was appropriate to bring a contempt application against that individual (and the draft order proposed now also acknowledges that the University would require the permission of the Court to do so). This decision would be brought back to the Council to make, given its importance for the individual concerned; I do recall that this is something which I conveyed at this meeting.

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: 16 March 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

EXHIBIT ER4

THE COUNCIL

LEGAL POWERS

The Council shall have authority to take legal advice, retain solicitors, and bring, defend, or conduct legal proceedings on behalf of the University as they may think necessary or desirable in the interests of the University.

APPEALS TO THE COUNCIL

Subject to the provisions of the Schedule to Statute C, the Council shall hear appeals from any person who comes within the jurisdiction of the University Tribunal under Statute D II 2 and upon whom a University authority has, under Statute A II 12 and in accordance with an Ordinance or with a rule made under Ordinance, imposed a sentence, provided that such a person has delivered to the Registry, within twenty-eight days after notice of the sentence imposed by the University authority concerned, written notice of their appeal to the Council. The Council shall have power to quash the finding or to vary the sentence within the limits of the power of that authority, and the decision of the Council shall be final.

RESERVED BUSINESS

Under the provisions of Special Ordinance A (viii) 5(iii) proposals for the conferment of degrees or titles of degrees, and any matter which would for a Faculty Board be reserved business under the provisions of Regulation 11 of the General Regulations for the Constitution of the Faculty Boards shall be reserved business of the Council in addition to the other matters listed under Special Ordinance A (viii) 5.

NOTICE BY THE COUNCIL

Statement of intention

In carrying out their functions as the principal executive and policy-making body of the University the Council will consult the Regent House on questions of policy which in the Council's judgement are likely to prove controversial. They will do this by submitting a Grace to the Regent House for the approval of a provisional decision or statement of intention; where appropriate, such a Grace will allow for the expression of a preference between alternative options. The Council will give consideration to remarks made at any Discussion of such matters and to the outcome of any vote on them.

ELECTION OF MEMBERS OF THE COUNCIL

Members in classes (a)–(c)

Ballot. 1. At each election of a member or members of the Council in any of classes (a), (b), and (c) voting shall be as set out in Regulations 2–7 below.

2. The election shall be conducted in accordance with the Single Transferable Vote regulations.

3. The period during which votes may be cast by all members of the Regent House shall be determined by the Vice-Chancellor, who shall give public notice of that period, provided that, for an election held in the Michaelmas Term, voting shall commence at least ten days after the promulgation of the Roll of the Regent House and the latest time for casting a vote shall not be earlier than the tenth day after the day appointed for the commencement of voting.

Nominations. 4. In order to be eligible in any class a candidate must be nominated on a paper sent to the Vice-Chancellor so as to arrive not later than noon on the tenth day before the date appointed for the commencement of voting. The paper must contain (a) a statement signed by two members of the Regent House, certifying that they nominate the candidate for election as a member in that class, and (b) a statement signed by the candidate certifying that they consent to be so nominated. No person shall be nominated for election in more than one class. On the receipt of each nomination the Vice-Chancellor shall forthwith publish it by causing it to be posted outside the Senate-House. A nomination may not be withdrawn after such publication.

5. Not later than the last day for the receipt of nominations each person nominated for election shall send to the Registry a *curriculum vitae*, details of which shall be published for the information of members of the Regent House.

6. There shall be a separate vote for each class of members to be elected.

7. An election shall not be deemed invalid owing to the misdirection, late arrival, or non-arrival of any material relating to the election.

Cambridge professor arrested in Just Stop Oil protest

Professor Jason Scott-Warren said that he would not 'stand by' as government inaction on climate change 'opens the gates of hell'

by Amelia Platt

This article is 1 year old
Friday November 3 2023, 2:35pm



39 shares



The Professor has been involved in climate action in Cambridge and more widely JUST STOP OIL WITH PERMISSION FOR VARSITY

A Cambridge professor was arrested during a Just Stop Oil protest in London on Wednesday (01/11).

Professor Jason Scott-Warren, Director of Studies in English at Gonville & Caius, said that civil disobedience from groups like Just Stop Oil is necessary to send a "clear message" that the public "will not stand by as politicians open the gates of hell."

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WE WILL NOT COMPLY

If @metpoliceuk refuse to arrest the criminals issuing new oil and gas, ordinary people will refuse to comply.

Demand action against the government. Sign up to march at juststopoil.org

Watch on X

UNIBET

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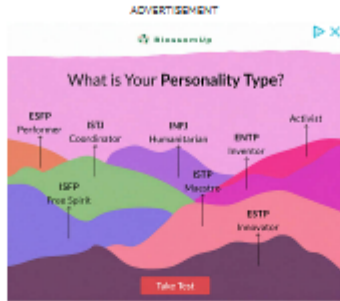
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Scott-Warren, who has been **arrested** before, during the spate of actions by Extinction Rebellion (XR) in 2019, was stopped on Wednesday by the police during a slow march protest on Cromwell Road.

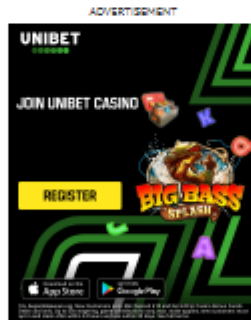
According to initial **Metropolitan Police** reports, officers arrived at Cromwell Road within four minutes of the protest beginning, clearing the road within twenty-six minutes. Thirty-five arrests were also said to have been made for breaches of Section Seven of the Public Order Act (2023).



In further updates posted yesterday, the Police said that a further twenty-three Just Stop Oil activists had been charged and remanded in custody with thirteen individuals being bailed.

Varsity spoke to Professor Scott-Warren about his activism and his arrest.

"I'm genuinely scared about the current situation, where we are rapidly approaching 1.5 degrees of warming and are beginning to see how terrible this is going to be, but the people in power are still propping up fossil fuels," Scott-Warren said.



"This is a war and the fossil fuel industry is winning. Just Stop Oil's protests are focused on undercutting the business model of that industry, which is a prerequisite for meaningful change," he continued.

"Just Stop Oil is responding to the government's draconian anti-protest legislation by organising waves of arrests that send a clear message: we as citizens are rightly terrified and we will not stand by as politicians open the gates of hell," Scott-Warren added.

When asked about the Metropolitan Police's approach to Just Stop Oil's demonstrators, Professor Scott-Warren said: "The Met has been bullied into submission and is no longer protecting the rights of protesters."

"Its only goal is to get protesters off the road as quickly as possible, by any means; it has become a puppet of the state, which is in turn a puppet of the fossil fuel industry," he added.



"These arrests, if they result in charges, will not stand up in court, where the right of proportionate protest is still acknowledged," the professor continued.



Discussing the disruptive nature of climate-related civil disobedience, Scott-Warren said: "We are fighting for the continued possibility of human society, which is currently threatened as never before in history. Protest, if it's going to work, has to be disruptive."

The English professor promised to "continue to take part in protests whenever he can" and encourage others to do the same, stating "this is our last chance".

Climate protesters have been particularly active at universities in recent days, with a Just Stop Oil activist **spraying King's College** with orange paint, following similar actions at Oxford, Bristol, and Exeter universities. ●



XR Activist Dr Jason Scott-Warren: 'All other more moderate means have basically failed'

Dr Jason Scott-Warren has been fined for his involvement with Extinction Rebellion, but remains dedicated, telling *Varsity*: "something extreme needs to happen in order for change to take place"

by Marion Willingham

Friday October 29 2021, 12:00am



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TOM DORRINGTON

In October 2018, three years ago now, the International Panel on Climate Change released a special report on what could happen if the earth warms by more than 1.5°C. Put simply, the consequences involve flooding, drought and the risk of poverty for hundreds of millions of people. The report warned that we had only 12 years to prevent these effects. For many, including Dr. Jason Scott-Warren, Cambridge University English literature professor, this report was a wake-up call.

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Scott-Warren, a lecturer and research fellow at Gonville & Caius college, says the report "punctured a state of illusion I was in that things were basically OK and must be, in some sense, under control." This is not to say that he had never engaged with the problem of climate change before. He had been watching the issue 'with alarm' for some time, and reveals that when preparing for a recent court case, after his arrest at an Extinction Rebellion protest in London, he discovered that he had been donating to

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So what happened in the 26 years between that initial donation and his visit to the City of London Magistrates Court in 2020? A pivotal moment for Scott-Warren was the formation of the Extinction Rebellion movement (popularly referred to as 'XR'): "The formation of XR in 2018 kind of coincided with [the IPCC report] and was pretty crucial to me, because, although I had been involved in strike action, I had seen student occupations going on and been supportive, and I'd gone on marches and demos, I hadn't ever really done anything that could count as civil disobedience before."

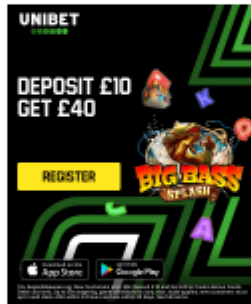
"It creates a demand for action that moderate people can rise to"

And what was the appeal of civil disobedience? "I think the idea that you might cross a line, and that the social contract is broken and therefore to some extent the standard operation of the law is suspended. That kind of logic suddenly made a lot of sense to me, you know, that something extreme needs to happen in order for change to take place."

XR's demand – that the UK government reaches net zero greenhouse gas emissions by 2025 – is, according to Scott-Warren "not extreme if you think there's a planet to save, but extreme in the sense that it's not on anyone's political agenda".



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Scott-Warren's view on the negative perceptions of XR's 'extreme' activities is that "by demanding something which feels extreme in the given political climate, XR opens up a space within which other people can do things that seem to them more pragmatic but which are pushing further and further towards the demands that we're making".

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"By being willing to put yourself in that position of the extremist, everyone else gets to be not the extremist, but they're kind of pressured to do something, so it creates a demand for action that moderate people can rise to."

“I’m just going to keep pushing for change and keep hoping that it will come”

Following his involvement in XR’s ‘April Rebellion’ in London in 2019, Scott-Warren was arrested and found guilty of several public order offences, because the protest action was deemed unreasonable. He tells me that “The judge said that you could influence the situation through the ballot box”, but argues that “the situation we’re in proves that democracy is not working as a solution to this problem.” “All other more moderate means have basically failed. That word failure disguises lots of smaller successes, there have been lots of victories along the way, but none of them have been sufficient.” Sufficient, he means, to stop us reaching that 1.5°C of global warming which this year’s IPCC report warns is dangerously close.

In 2020, Scott-Warren took part in XR’s ‘Rebellion of One’ in which individuals blocked roads wearing emotive sandwich boards. Scott-Warren’s read: ‘I’m terrified for my children and my students because of the climate crisis’. No stranger to solo protests, Scott-Warren also spent months protesting at his local petrol station in 2019. Asked about the rationale behind this technique, he says “obviously it’s dramatically powerful to suggest that one person can stand up against the juggernaut, or throw themselves on the gears or whatever it might be, and that’s something about the relationship between drama and agency, how do you start to create responses that might make people shift in their views?” XR’s ‘Rebellion of One’ project harnessed this drama as a group. “It was one person sitting in the road, but there was a kind of support structure there as well.”

This is one of the advantages of collective action, he says. “I think XR has turned into this quite amazing organisational structure, with lots of support roles and lots of knowledge, knowledge from past actions feeding into future actions in a very disciplined way”. Despite his belief that collective action can be incredibly rewarding, participating in it has not always come naturally. “As an academic, taking part in collective action of any kind is always quite strange because I think academic life is quite individualistic, so the idea of subsuming yourself into any kind of collective will is actually counterintuitive and sometimes feels quite painful.”



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Continuing to discuss the “uneasy” relationship between academic and activist, Scott-Warren emphasises that he engages in activism “more as a private individual, than as an academic.” Comparing himself - an English literature professor - to climate scientists, he says “I haven’t got a very strong connection between my academic self, the kind of research I do, and my activist self.” Moreover, he doesn’t want any controversy surrounding his academic status to overshadow the intentions of the action, and has avoided prominent involvement in some “more outlandish” actions to discourage media coverage focusing on his position at the university rather than on XR’s message.



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lor Stephen Toope**

As for the university itself, he expressed his admiration for the Cambridge Zero Carbon campaign and the achievement of pushing Cambridge University to pledge to divest from fossil fuels, but notes that there's still more to be done: "I now think there are new challenges in terms of the timetable, speeding up the timetable for decarbonisation would be a really good thing."

Clearly, however, Scott-Warren and Extinction Rebellion are acutely aware that heeding the warnings from the IPCC will involve changes far beyond one university. With 9 years left to act on that 12 year warning, Scott-Warren says "I'm just going to keep pushing for change and keep hoping that it will come." ●

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University of Cambridge to refuse funding from fossil fuel companies

The institution accepted £19.7 million from oil giants BP and Shell between 2016 and 2023 in philanthropic and research funding



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It is understood to be the first time that a British university has ended research funding partnerships with the fossil fuel industry Credit: P A THOMPSON

Emma Gatten Environment Editor. Felix Armstrong

18 March 2024 5:30pm GMT

The University of Cambridge will halt funding from fossil fuel companies following a campaign from its students and academics.

A moratorium on new funding from fossil fuel companies and subsidiaries, until a review is carried out of the donations process, was adopted in a council meeting on Friday.

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It follows recommendations in a report commissioned by the university last year after a group of academics formally called for it to end fossil fuel funding.

The move was first reported by the Financial Times, which said the university had accepted £19.7 million in philanthropic and research funding from oil giants BP and Shell between 2016 and 2023.

It is understood to be the first time that a British university has ended research funding partnerships with the fossil fuel industry.

The university has also been under pressure over donations from individuals backed by fossil fuel wealth, such as UAE oil tycoon Majid Jafar, the chief executive of Crescent Petroleum.

The Telegraph understands the moratorium would only apply to collaborations with companies and would not stretch to individuals, regardless of their backgrounds.

Earlier this year the university approved a £20million donation from the Jafar family towards the development of a Cambridge children's hospital and research institute.

It was criticised at the time by Jason Scott-Warren, an English professor and member of the University Council.

Mr Scott-Warren told the Telegraph on Monday that he hoped that the university would "adopt a consistent policy in relation to fossil fuel donations".

"Increasingly, universities are being approached by institutions in petrostates and autocracies, and given the broader situation it's tempting for them to accept philanthropy from those sources," he said.

Reputational risks

A report written by former UN climate change envoy Nigel Topping last year said continuing fossil fuel funding would expose the university to "reputational risks" that it had so far underestimated.

It was commissioned by the university after a group of academics submitted a formal proposal to the university's senate calling for it to "cease collaboration of all forms" with fossil fuel companies.

The university has a target to reach net zero in greenhouse gas emissions by 2038, and previously announced it would divest from all direct and indirect

investments in fossil fuels by 2030.

In the report, Mr Topping said “due diligence finds that no fossil fuel companies are aligned with the University’s level of ambition”.

But he did not recommend that the university stop non-funded “technical collaboration” with fossil fuel companies.

It noted that fossil fuel companies made up only around 0.4 per cent of the university’s research and philanthropic funding.

Mr Scott-Warren, a professor of early modern literature at the university, said the moratorium was “the least the university could do” but added that he had concerns about the outcome of the review.

Cambridge is one of several universities to have faced calls from staff and students to sever ties with the fossil fuel industry.

It ranks as 72 out of 151 in a league table of environmental and ethical credentials compiled by student campaigning network People and Planet.

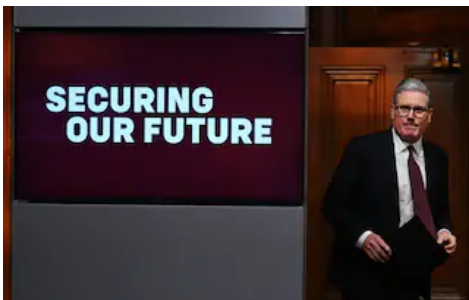
A Shell spokesman said that since 2021 all of its work with the university “has been entirely focused on the energy transition”.

“Our work with academic partners aims to accelerate the energy transition by bringing together the brightest minds, with the right resources behind them, as well as the commercial ability to scale-up and implement new solutions fast enough to make a difference.”

Emma Gatten Environment Editor. Felix Armstrong
18 March 2024 5:30pm GMT

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Cambridge 'sidelining ethics' as university accepts £20 million from UAE tycoon

Donation from oil tycoon Majid Jafar criticised because of his comments on climate change

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Cambridge University has not yet imposed a ban on funding from oil companies Credit: IAN DAGNALL/ALAMY

Felix Armstrong. Louisa Clarence-Smith
15 February 2024 9:34pm GMT

Cambridge University has been accused of “sidelining ethical considerations” after accepting a £20 million donation from a UAE oil tycoon.

Students and academics have criticised the university’s decision to accept funds from Majid Jafar, chief executive of Crescent Petroleum, the largest privately owned oil and gas company in the Middle East, because of his comments on climate change.

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Jason Scott-Warren, an English professor and member of University Council, claimed that Cambridge “persistently sidelines ethical considerations in its efforts to secure donations to fund its mission”.

He told Varsity, the Cambridge student newspaper: “When large sums of money are offered for projects that enhance our research and teaching, human rights violations and flagrant planet-trashing become distinctly secondary concerns.”

Speaking at COP28 in Dubai last year, Mr Jafar, a Cambridge alumnus, said that “blaming the producers of oil and gas for climate change is like blaming farmers for obesity”.

At the same conference, the businessman told António Guterres, the UN Secretary-General, that he should have travelled to the conference in “a wooden boat powered with sails and oars”, when asked about the continuation of fossil fuels.



Majid Jafar, chief executive of Crescent Petroleum Credit: SIMON DAWSON

He has been a vocal defender of the development of oil and gas amid the energy transition.

Speaking in 2022, he said: “Somehow, it got misconstrued that we don’t need oil and gas any more. Nobody actually said that.”

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The Jafar family is donating £20 million towards the development of a Cambridge children's hospital and research institute.

The family said they would donate the money to the project after Mr Jafar's daughter was diagnosed with a rare neurogenetic disorder. He is co-chairing a campaign to raise a total of £100 million to build the facility.

The donation was approved by the university's Committee on Benefactions and External and Legal Affairs (CBELA), which scrutinises any proposed large donations.

It comes after a report commissioned by the university recommended that it halt all funding from fossil fuel companies last year.

The report, led by Nigel Topping, former UN climate action champion, found that the university's acceptance of research funding from the fossil fuel industry poses "high reputational risk" and urged Cambridge to "clarify" CBELA's scrutiny of donations from parties associated with oil and gas.



Prof Jason Scott-Warren claimed that Cambridge 'persistently sidelines ethical considerations'

The university has pledged to implement some of the recommendations but has not yet imposed a ban on research funding from oil companies.

Mr Scott-Warren said he fought against the donation when it made its way through University governance.

He said: "I queried the Jafar donation at the University Council meeting in March 2021... It was clear that Crescent Petroleum and Dana Gas were banking on an expansion of fossil fuel demand to 2030 and beyond."

Sam Hutton, chair of the Cambridge Student Union's Ethical Affairs campaign, also criticised the University's decision to accept the donation.

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He said: “Taking a donation from a person so clearly linked to the fossil fuel industry seems to indicate their willingness to get the money in while they can. While millions are being displaced and suffering famine due to the effects of climate change, the university continues to procrastinate its commitments to stop our complicity in this destruction.”

Donations to Conservative Party

Mr Jafar has made multiple donations to the Conservative party, including £12,500 in March 2019 and £28,000 in December 2016. In 2019, the businessman gave £3,000 to Leo Docherty, MP and former Director of the Conservative Middle East Council (CMEC), to which Mr Jafar donated £15,000 in 2014.

A university spokesman said: “As with all donations and research funding to the university, this gift was accepted following robust due diligence procedures to scrutinise compatibility and alignment with our mission and values. Decisions take into account the university’s ethical guidelines, and also, since October 2020, the university’s climate change guidelines.

“We are immensely grateful for this personal donation from a Cambridge alumnus and his family, supporting the establishment of Cambridge Children’s Hospital and enabling it to carry out groundbreaking research and to improve the lives of children not only locally but also nationally and even internationally.”

‘Natural gas as transition fuel’

A spokesman for Mr Jafar said: “The COP28 declaration in December last year clearly accepted the need for natural gas as a transition fuel to replace dirtier fuels like coal and diesel in developing countries and thereby enable the addition of intermittent renewables when the sun doesn’t shine and the wind doesn’t blow (just as happens in the UK). Majid agrees with this as the fastest way to reduce carbon emissions in developing countries.”

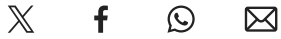
Regarding Mr Jafar’s political donations, they said: “These past donations are all on the public record but he has not donated for the past 5 years.”

The spokesman said the company “achieved carbon neutrality across operations in 2021 and that gas is 85 per cent of its production, displacing diesel for power generation in the Middle East and saving millions of tonnes of CO2 emissions annually”.

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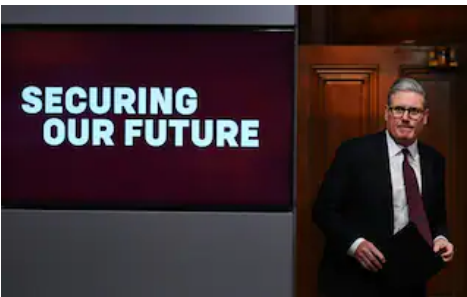
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Cambridge University about-turns on fossil fuel donations – but only if they are big enough

University scraps temporary ban under new process welcoming sums in ‘exceptional circumstances’

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Just Stop Oil activists stand outside King's College, Cambridge, in October 2023 Credit: Martin Pope/Getty Images

Poppy Wood Education Editor. Felix Armstrong

17 July 2024 8:04pm BST

The University of Cambridge has scrapped a temporary ban on donations from fossil fuel companies and will now accept sums if they are “for a large gift... usually [of] several million pounds”.

The university said it had agreed on a new process for considering funding from fossil fuel companies on Tuesday that would welcome donations under “exceptional circumstances”.

1075

Its committee on benefactions and legal and external affairs (CBELA) may now accept donations if they are “for a large gift, or equivalent value for a research collaboration (usually several million pounds) which could not be obtained elsewhere”.

Funding from such companies must also be shown to advance “the university’s overall academic and institutional aims”.

All other sums must be from companies committed to the UK’s target for reaching net zero by 2050, the university’s website said.

It overrules a temporary ban on fossil fuel donations brought in earlier this year after an independent report warned that due diligence failings had created a “high reputational risk” to the university.



University staff inspect damage to the exterior of a 15th century King's College building from climate protesters. Credit: Martin Pope/Getty Images

The temporary suspension on funding, which began in March, came after a report by Nigel Topping, the UN climate champion, suggested Cambridge’s association with industry was not worth the reputational risk.

The report found that the fossil fuel sector made up 0.4 per cent of the university’s research and philanthropy funding in the six years up to 2022.

Announcing the move, Cambridge admitted it was “aware” of calls for a **1076** “blanket ban” on fossil fuel cash.

However, it said this may “cause tension in relation to academic freedom and freedom of speech” and “give rise to questions” regarding its obligations under charity law.

UK-based oil and gas companies BP and Shell have jointly donated more than £19.7 million to the university since 2019, according to the Financial Times.

University ‘sidelines ethical considerations’

Cambridge was also accused of “sidelining ethical considerations” in February when the university took £20 million in funding from Majid Jafar, the owner of the Middle East’s largest oil company.

Mr Jafar is the chief executive and founder of Crescent Petroleum and the managing director of Dana Gas, the largest non-government-owned natural gas company in the Middle East.

The money went towards the development of a Cambridge children’s hospital and university research institute.

The policy will replace existing advice for CBELA, the university’s body for considering donations, which ranked fossil fuel companies red, amber, or green according to their alignment with the Paris Agreement on climate change, The Telegraph understands.

The new process is understood not to have received unanimous support from the university council making the decision. It comprises senior university officials such as Prof Deborah Prentice, the vice-chancellor.



Prof Jason Scott-Warren, of Gonville and Caius college, described the new policy as 'absurd' Credit: University of Cambridge

Prof Jason Scott-Warren, one of 25 members of the council, said: “This absurd decision reflects the fundamentally unethical nature of the university, which doesn’t begin to get the climate emergency and which remains densely intertwined with the fossil fuel industry.”

Mr Scott-Warren claimed that despite Mr Topping’s report, Cambridge has decided to ditch the colour-coded donations scale in favour of “these new proposals, which make the size of a donation the decisive factor”.

He said the policy “leaves the door open for multi- million pound donations and collaborations from fossil fuel majors”.

A spokesman for the University of Cambridge said: “The university will not accept research or philanthropic funding from a fossil fuel company whose business model is not aligned with the target of reaching net zero emissions by 2050, unless there are exceptional circumstances.

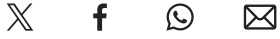
“No fossil fuel company is currently understood to have a business model that aligns with net zero 2050 targets.”

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1024. Issues arising from the Greenwich House Occupation

The Registry provided the Council with a summary of last term's occupations at Greenwich House and Senate House Yard – both of which were claimed to be in support of Cambridge for Palestine. The update covered what happened and outlined the risks, lessons learnt and actions being considered to protect the University from future unlawful protests.

Members noted that, in common with other universities, the approach to student occupations needed to ensure that students could graduate as normal, and staff could continue to work in the University's administrative buildings. This included preventative measures to reduce the risk of subsequent occupations of sites such as Senate House and Senate House Yard. Members stressed the need for good communication with students about any changes and potential ramifications of future action.

The Council also considered the membership of the two student members of the Student Task Force on the Working Group on Investments in and Research funded by Companies belonging to the Defence Industry. Following a detailed discussion, the Council, by majority vote, agreed that the two members of the Student Task Force should be invited to re-join the Working Group, subject to two conditions: 1) should either student be personally found to have been involved in any criminal activity at Greenwich House in Michaelmas Term 2024, their personal membership

on the Working Group would cease; 2) no member of the Task Force could serve on the Working Group while an occupation or encampment connected with issues being explored by the Working Group was taking place at the collegiate University.

The Pro-Vice-Chancellor for University Community and Engagement and the Pro-Vice-Chancellor for Education and Environmental Sustainability updated the Council on the University's application to become a University of Sanctuary and discussions with other universities and UNWRA regarding educational rebuilding in Gaza. There was also regular dialogue with the University Jewish Society and the Acting Jewish Chaplain, including a visit from the Universities Jewish Chaplaincies. They also reported that 15 grants had been made so far from the Humanitarian Support Fund for students who had been affected by violence in in Gaza, the West Bank, Sudan and Ukraine

Financial Regulations

**Adopted and approved on 28 May 2012
by the Council after consultation with the Finance Committee
Distributed by the Director of Finance to all Heads of Department**

Version 1.8 effective from 1 October 2024



Version History

Version	Effective date	Detail	Authority	Distributed
1.0		Financial Regulations 2012	Adopted and approved on the 28 May 2012 by the Council after consultation with the Finance Committee	By the Director of Finance to all Heads of Department
1.1	1 Jan 2016	Schedule 1: revised thresholds for EU Tenders managed through Procurement Services	Public Contracts Regulations 2015	
1.2	1 Jan 2018	Schedule 1: revised thresholds for EU Tenders managed through Procurement Services	Public Contracts Regulations 2015	
1.3	1 Jan 2020	Schedule 1: revised thresholds for EU Tenders managed through Procurement Services	Public Contracts Regulations 2015	
-	-	Reflected changes to UAS division names, cessation of HEFCE etc	Amended following the approval of Graces 1 of 31 March 2021	
1.4	1 Jan 2022	Schedule 1: revised thresholds for EU Tenders managed through Procurement Services	Public Contracts Regulations 2015	
1.5	1 Jul 2022	Reg 31.3: the rules for expense reimbursements are set out in the Financial Procedures Manual	Adopted and approved 25 May 2022 by the Council after consultation with the Finance Committee	Key Issues Bulletin (16 June 22) to Heads and operational leads
1.6	1 Oct 2023	Schedule 1: increases the current procurement threshold above which departments require three competitive quotes from £1,000 to £5,000.	Approved 14 Aug 2023 by the Council on advice of the Finance Committee	By Notice (Reporter, 6711, 27 Sep 2023, p.3). Key Issues Bulletin (5 Oct 2023) to Heads and operational leads. CUFS Bulletin (9 Oct 2023) to Finance Key Contacts.
1.7	1 Feb 2024	<p>F- PURCHASING Reg 18.4(d): reference corrected to Regulation 6.2</p> <p>J- STAFFING Reg 31.3 <i>The principles and rules for expense reimbursement are set out in the Employees Expense Policy</i> and not the Finance procedures.</p> <p>M - EXPLANATORY NOTES point 9: provision for delegation now at Special Ordinance A (viii) 4.</p> <p>Point 11: in relation to EU Public Procurement Directives the second and third sentences replaced with the following new sentence: <i>The Council, on the advice of its Finance Committee, reviews and confirms annually whether the University remains outside their scope.</i></p> <p>SCHEDULE 1 – COMPETITION PROCEDURES The references to EU thresholds and the management of EU Tenders through Procurement Services have been removed from the table.</p> <p>SCHEDULE 2 – DEFINITIONS The reference to EU Tenders has been removed.</p>	Approved 1 Feb 2024 by the Council on advice of the Finance Committee	By Notice (Reporter, 6728) Key Issues Bulletin to Heads and operational leads CUFS Bulletin to Finance Key Contacts (12 Feb 2024)

1.8	1 Oct 2024	<p>F - PURCHASING</p> <p>18.4(b) The limit for advance payments requiring prior written consent from the Head of Department has been increased from £10,000 to £50,000 (inclusive of VAT).</p> <p>18.4(c) The threshold for advance payments requiring approval from the Director of Finance has been raised from £10,000 to £50,000 (inclusive of VAT).</p> <p>18.4 (d) The clause requiring the Director of Finance's advice for procurement has been extracted from the previous 18.4(c) and is now separately identified as 18.4(d).</p> <p>18.4(e) The previous clause 18.4(d) has been renumbered as 18.4(e).</p>	<p>Approved 25 July 2024 by the Council's Business Committee on the advice of the Finance Committee</p>	<p>By Notice (Reporter, 6751)</p> <p>Key Issues Bulletin to Heads and operational leads (03 Oct 2024)</p> <p>CUFS Bulletin to Finance Key Contacts (30 Sep 2024)</p>
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A PRELIMINARY

Terms in capitals are defined in Schedule 2 where necessary to aid interpretation.

The Council is responsible for the supervision and management of University resources and finances. The purpose of these Regulations is to provide sound arrangements for internal financial management, accounting, and control, and promote best value for money and compliance with the University's legal and financial obligations.

1. Scope

1.1 These Regulations apply to:

- all University Income and Business;
- all Staff; and
- all Departments and University subsidiary companies but not Cambridge University Press or Cambridge Assessment.

2. Ethical Principles

2.1 University Business shall be conducted in accordance with the Nolan Principles: selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.

2.2 Staff must ensure that:

- (a) neither their conduct of University Business; nor
- (b) the conduct of any person or organisation entering into any contract or arrangement with the University, contravenes the Bribery Act 2010. (See also Financial Regulation 20).

There are four offences under the Bribery Act:

- Bribing another person;
- being bribed;
- Bribing a foreign public official; and
- failure to prevent Bribery.

Staff must not use their authority or office for personal gain and must always seek to uphold and enhance the standing of the University.

2.3 Staff must declare to their Head of Department any personal interest, which may affect any University Business and act in accordance with the instructions given as to management of any conflict.

2.4 Staff must seek written permission from their Head of Department before accepting gifts or hospitality directly or indirectly from suppliers, other than low value items such as a gift worth less than £25 or hospitality worth less than £50. Receipt of gifts or hospitality must not influence or appear to influence the choice of supplier or prejudice the University's reputation. If in doubt, gifts and hospitality must be refused. Excessive or lavish gifts or hospitality may constitute Bribery.

- 2.5 Where Heads of Department have a conflict of interest or wish to accept gifts or hospitality (other than low value items) they must seek the advice of the body or person to whom they are responsible, for example Head of School, management board or General Board, and act as advised.

3. Staff Responsibilities

- 3.1 Staff shall, irrespective of sources of funding:
- comply with these Regulations and Statutes, Ordinances and University policies;
 - take all necessary advice;
 - assess and manage risks (including to health and safety) entailed in University Business they transact;
 - safeguard University property and Income for which they are responsible;
 - use University resources economically, efficiently, effectively to secure value for money and to promote the Environmental Sustainability Policy;
 - ensure compliance with all obligations in contracts relevant to them entered into by or on behalf of the University; and
 - comply with the University's legal, financial, administrative, and other obligations including to HEFCE, HM Revenue and Customs and other government authorities.
- 3.2 Non-observance of these Regulations may result in disciplinary action.

B HEADS OF DEPARTMENT

4. Definition and Responsibility

- 4.1 'Head of Department' means any of the following: the Head of a Department or a Faculty not organised in departments, Secretaries of Faculty Boards, Head of a Centre, Institute or other body under the supervision of the General Board or Council, and Head of a Division within the Unified Administrative Service. "Department" is interpreted accordingly.
- 4.2 Heads of Department shall ensure:
- proper allocation of funds;
 - sound financial control, authorisations, and separation of duties;
 - that accounts are correctly maintained;
 - that funds available for spending are not exceeded;
 - that these Regulations and other University policies are publicised and observed within their Department; and
 - that all information and explanations required by the University's internal or external auditors are provided promptly.

5. Departmental Management

- 5.1 Heads of Department may designate in writing one or more people to execute specified tasks for and subject to the supervision of the Head of Department. The Head of Department remains responsible.

C CONTRACT EXECUTION AND COMMENCEMENT

6. Authority to Sign Contracts

- 6.1 Subject to Regulations 6.2, 6.3 and 18.4 Heads of Departments have authority to sign contracts in the course of the ordinary business of their Department in respect only of available funds for which they are responsible.
- 6.2 Contracts for the purchase, lease or licence of land or property or for the erection, demolition, substantial repair or alteration of buildings must be referred to ED and are subject to the Sites and Buildings Regulations (see further Regulation 32 and Explanatory Note in Section M). The Director of Estates Division or the Registry, shall approve and sign all such contracts, provided all approvals required under Statutes, Ordinances and the Sites and Buildings Regulations have been given.
- 6.3 The Head of the Research Operations Office shall approve and sign all contracts relating to sponsored research activity (but not purchasing, for which see Regulation 18.2). Small collaborations directly related and subsidiary to a purchase may be executed as part of that contract provided the Research Operations Office is consulted.
- 6.4 Subject to Regulations 6.2 and 6.3 the following persons have authority to sign contracts affecting more than one Department:
- the Vice-Chancellor;
 - a Pro-Vice-Chancellor;
 - the Chair of the Faculty Board or Head of School where all the Departments affected are in that Faculty or School;
 - the Registry;
 - the Director of Finance; and
 - Head of Procurement Services.

7 Sealing

- 7.1 The following persons have authority to authorise affixing of the University's seal, where any necessary approvals are in place:
- the Vice-Chancellor;
 - a Pro- Vice-Chancellor;
 - the Registry;
 - the Director of Finance; and
 - (for assignment of University intellectual property) the Head of the Research Operations Office.

8. Documentation, Liability and Performance

- 8.1 Procurement Services is responsible for safekeeping of the original contracts they execute. Otherwise, the Head of Department is responsible. If required, the Registry or Procurement Services will keep the documentation for contracts affecting more than one Department.
- 8.2 Departments are responsible for meeting obligations and for all costs or losses arising from contracts entered into by or for them.

8.3 Contract performance shall not begin before:

- all necessary approvals have been obtained; and
- the contract has been executed or the person executing it is satisfied that key terms have been agreed and the risks created by delay outweigh the risk of proceeding prior to full contractual agreement.

D INCOME AND EXPENDITURE

9. Accounting and Other Records

9.1 Heads of Department shall:

- maintain financial records as specified in Statutes and Ordinances;
- certify whether annual statements of account (which are distributed by the Finance Division) are true and fair and that responsibilities under these Regulations have been discharged during the year; and
- properly record all transactions in CUFS and any other financial system the use of which has been authorised by the Director of Finance.

9.2 Staff must comply with the Finance Division CUFS user policy.

9.3 Record keeping must comply with data protection legislation. The University is subject to the Freedom of Information Act 2000 and members of the public may request copies of University documents. Staff must follow the guidance published by University's Information Compliance Office and take their advice as necessary.

10. Cash and Banking

10.1 All University Income must be paid promptly into a bank account in the name of the University (and into no other account) and be accounted for in CUFS. All University expenditure must be paid from a University bank account and be accounted for in CUFS.

10.2 Departments and Staff have no authority to open bank accounts (whether in the UK or abroad) for any University activities without the prior written consent of the Director of Finance.

10.3 Where possible, Departments shall separate duties for receiving and recording University Income. Where this is not possible regular independent checks shall be made.

10.4 The Financial Procedures Manual lays out further financial requirements including in respect of cash, petty cash, banking, credit card and related matters.

11. Management of Expenditure and Use of Resources

- 11.1 Heads of Departments are authorised to incur expenditure not exceeding the limits of funds available to the Department. They are responsible for ensuring that monitoring and control arrangements are adequate to prevent over-commitment of expenditure; that all funds under their control are used only for the purposes for which they are allocated; and resources are used in accordance with the Environmental Sustainability Policy. The Head of Department (or budget holder where authorised by the Head of Department) shall approve expenditure.
- 11.2 The Financial Procedures Manual lays out further financial requirements and guidelines, including in respect of travel, subsistence and entertainment and related matters.

12. Supplying Goods or Services including Research

- 12.1 Heads of Departments must establish procedures to ensure that:
- all supplies of goods and services are authorised and are supplied as agreed;
 - trading accounts are managed to break even or achieve a surplus;
 - all relevant risks to the University are considered and managed, there are adequate credit control procedures and supplies are made only where the credit risks are acceptable;
 - the University's standard terms and conditions are applied where possible;
 - invoices other than for sponsored research funding (see Regulation 13.3) are raised
 - in the name of the University of Cambridge showing the University's VAT number;
 - through CUFS unless prior written consent is given by the Director of Finance; and
 - wherever possible in sterling for settlement in sterling (any exchange risk lies with the Department for invoices in a currency other than sterling);
 - the liability for all taxation is established and tax is charged and accounted for as appropriate (see Regulations 25 and 29);
 - except for research contracts, which are subject to Regulation 13, the full economic cost to the University is recovered, unless the advice of the Taxation Section is sought, and it is appropriate to do otherwise having regard to the particular circumstances;
 - best value is obtained for sale of any goods to external bodies or to staff (and the Taxation Section consulted about VAT and tax implications);
 - sales to staff or their families below the cost incurred by the Department in providing the benefit (including where no charge is made) are recorded and reported as a taxable benefit at the end of the tax year (see Regulation 21.2);
 - where payment for goods is received in cash, the sum does not exceed the cash equivalent of €15,000 (for any single transaction (per the Money Laundering Regulations 2007));
- 12.2 With the exception of research grants claims, Departments are responsible for debt collection in respect of invoices issued to third parties. Advice must be sought from the Director of Finance where legal action to recover monies is considered.

12.3 Uncollectible debts, including in respect of sponsored research activity, will be an expense against the Department. The following authorities exist to write-off bad debts or for part settlement, where all reasonable steps have been taken to recover them:

- Debtors up to £10,000 - Head of Department
- Debtors of between £10,000 and £25,000 - Director of Finance
- Debtors over £25,000 - Finance Committee.

The Taxation Section must be informed of all write-offs (including partial write-offs) of VAT invoices, as the VAT may be reclaimable.

13. Research Grants

13.1 Staff shall send grant applications and proposals for research contracts to the Research Operations Office for approval before their submission in accordance with Research Operations Office policy.

13.2 Heads of Department shall ensure there are appropriate arrangements

(a) in conjunction with the Research Operations Office to:

- cost grant applications and proposals on the basis of the full economic costs of the research; and
- recover charges for facilities and overheads in accordance with and at the rates specified in University policy or record the extent and justification for subsidising the cost where in exceptional cases Head of Department agrees not to apply University policy for recovery rates; and

(b) ensure that research which is funded is conducted to meet the funding terms and conditions.

13.3 The Research Operations Office shall raise all invoices for sponsored research funding.

13.4 All research grant or contract income and expenditure, from whatever source of funds, must be notified to the Research Operations Office and no part of this income may be transferred into donation accounts or other special funds, other than funding remaining unspent at the end of the research which the funder has agreed the Department may retain.

13.5 Heads of Department shall ensure that expenditure on research activity complies with these Regulations. Financial control and record-keeping shall also comply with any additional Research Council or other funder's requirements.

13.6 The Research Operations Office shall ensure all grants are closed on a timely basis and without residual balances.

14. Donation Accounts and Trust Funds

14.1 Donations belong to the University, not to an individual, and must be paid into a donation account in accordance with Regulation 10.1. Donations must be requested and received exclusively for charitable purposes. Receipt which improperly influences any decisions made by or on behalf of the University may constitute Bribery. Acceptance of donations must be made in accordance with the Ethical Guidelines for the Acceptance of Benefactions.

- 14.2 Heads of Department must ensure that:
- donation accounts and trust funds are maintained in credit;
 - funds are applied for the public benefit for charitable, educational or research purposes only; and
 - any Ordinances or regulations governing the receipt of donations and the conduct of individual accounts are followed.
- 14.3 University trust funds are governed by regulations set out in *Statutes and Ordinances*. Trust fund managers shall ensure that funds are used for proper purposes in accordance with the rules of the specific fund and the University's general charitable purposes.
- 14.4 Transfers of donated funds to other institutions can only be to other charitable bodies and must always be approved by the Head of Department and be in accordance with the terms of the gift and the University's general charitable purposes. Transfers shall not be made until the receiving institution has confirmed in writing that the terms of the gift will be observed. Where the transfer relates to the Head of Department's research, the Director of Finance's prior written consent must be obtained.
- 14.5 Donations cannot be transferred to individuals, except where the individual is the donor, and the University is unable to meet the terms of the original gift.

E INVESTMENT AND BORROWING

15. The Cambridge University Endowment Fund (CUEF)

- 15.1 The University's Chief Investment Officer is responsible for all CUEF investment management activities. The Chief Investment Officer appoints and monitors external investment managers.
- 15.2 No Department or trust of the University may invest in any securities or other investments (including land and buildings) without the prior approval of the Finance Committee.
- 15.3 Acquisition of land is also subject to the Sites and Buildings Regulations (see regulation 32.1).

16. Investment in the CUEF and Deposit Account

- 16.1 Surplus funds (only) may be invested in the CUEF and Deposit Account. The Director of Finance is responsible for approving all new and any changes in CUEF holdings. Deposit Account eligibility rules and interest rates are published by the Director of Finance from time to time.

17. Borrowing, Guarantees and Loans

- 17.1 Departments must not borrow money outside the University.
- 17.2 No guarantees or letters of comfort may be issued except with the prior written consent of the Director of Finance.

- 17.3 No Department may make a loan including to staff or (outside the normal course of business) extend credit arrangements without the Director of Finance's prior written consent.

F PURCHASING

18. Obtaining Goods, Services or Construction Works

- 18.1 Expenditure of £2,000,000 or above on capital items (inclusive of VAT) requires the consent of the Planning and Resources Committee.
- 18.2 Value for money in purchasing is normally demonstrated through competition. The table in Schedule 1 sets out the minimum competition requirement when obtaining goods, services or construction works for all Departments; the only flexibility for a Department being set out in Financial Regulation 18.3. These requirements apply to all expenditure irrespective of the source of funding (including spending of grant monies and Leasing). If there is any reason to believe that offers which have been received are not competitive, further offers must be obtained. A Department must not enter into separate contracts, nor apply the Total Value calculation separately to contracts, with the intention of avoiding the application of these Regulations.
- 18.3 Prior written consent not to follow the competition procedures may be granted
- (a) for construction and Construction Related Procurement by:
- the Director of Estates Division where the Total Value is less than the EU Threshold; and
 - the Registry where it is at or exceeds the EU Threshold;
- (b) for other procurement by:
- the Head of Department where the Total Value is £50,000 or less and the Director of Finance where the Total Value exceeds £50,000 by recording the reasons on Procurement Services' on-line dispensation form;
 - for any procurement where the Director of Finance has issued a general consent (irrespective of the Total Value).

Schedule 1 sets out non-exhaustive examples of circumstances where dispensation might be appropriate. Notwithstanding the grant of a dispensation, all the other requirements of Financial Regulations must be met, including Regulations 18.4 to 18.9 inclusive.

- 18.4 (a) Departments must seek all necessary advice.
- (b) The Head of Department's **prior** written consent is needed for one or more payments in advance in relation to any contract totalling £50,000 or less, including VAT if applicable.
- (c) The Director of Finance's advice and prior written consent is needed for:
- all Leasing irrespective of the Total Value (except where a Leasing Framework Contract is used – see the definitions in Schedule 2); a cost benefit analysis shall be submitted where consent is required.
 - payments in advance exceeding £50,000 including VAT if applicable; and
 - payment under early settlement terms exceeding £250,000 including VAT if applicable

(d) The Director of Finance's advice is needed for:

- procurement (other than construction) where the Total Value exceeds £100,000 including VAT if applicable.
- procurement where the Total Value exceeds £50,000 including VAT if applicable and supplier terms are used

(e) The Director of the Estates Division's advice is needed for procurement falling within Regulation 6.2.

18.5 All purchasing shall be based on a specification drafted after consultation with anticipated users and assessment of the associated risks and environmental impact. The Procurement Procedures provide further guidance on purchasing and sustainable procurement.

18.6 Goods and services may be purchased externally only if:

- they are required for the achievement of financial, academic or organisational plans;
- they are not reasonably available elsewhere within the University; and
- the source, sufficiency and terms of the funding have been checked and confirmed.

18.7 Heads of Department must establish levels of authorisation and segregation of duties for contracts where the Total Value exceeds £500 for:

- short listing and acceptance of tenders;
- ordering and inspection of goods and services; and
- payment.

Where payment duties cannot be segregated, transactions must be independently checked on a regular basis.

18.8 Orders must state the nature, quantity and price of goods and services to be provided and where possible apply the University's terms and conditions. Copies of orders must be kept securely. Where an order is placed through CUFS, the electronic record suffices.

18.9 Official orders must be produced in a form approved by the Director of Finance for all purchases above £100 or any lower threshold set by the Head of Department.

18.10 Where equipment is to be loaned to the University free or at a discount, advice must be taken, the principles of Regulation 18 observed and an agreement put in place, including to regulate the University's responsibilities and rights at the end of the loan.

19. Receipt of Goods or Services, Payments for services to individuals

19.1 All goods and services must be checked promptly on receipt to ensure that they accord with order requirements and suppliers advised promptly about any discrepancies. Copies of signed delivery notes must be retained. If deliveries have to be acknowledged prior to checking, endorse the delivery note "Goods received unchecked".

19.2 Invoices must be checked and not authorised for payment until the goods or services have been checked, unless authority is in place to pay in advance (see Regulation 18.4), and those exceeding £1,000,000 have been countersigned by the Director of Finance.

19.3 Payments to individuals must comply with Regulation 31.6.

- 19.4 Heads of Department shall establish arrangements for monitoring and regular appraisal of purchasing activity to ensure that best value for money is secured for current and future purchases.

G BRIBERY AND FRAUD

20. Bribery, Fraud and Irregularity

- 20.1 Heads of Department shall implement procedures as required under the University's policy against Bribery and Corruption¹, including to prevent Fraud.

Any member of staff shall report immediately in writing any suspicion of Bribery, Fraud or other irregularity to the Registry and the Director of Finance. The Registry is the lead officer under the University's policy against Bribery and Corruption.

- 20.2 The Director of Finance will advise the University's internal auditors and if necessary, the University Security Adviser and police, and report to the Audit Committee and the Vice-Chancellor any Bribery, Fraud or irregularity which has any of the following characteristics:
- exceeds £10,000
 - is unusual or complex
 - public interest is likely.
- 20.3 Any member of Staff who has reasonable grounds for believing there is serious malpractice within the institution (see Human Resources Division website, Policies and Procedures; Public Disclosure by University Employees: Whistleblowing Policy) should raise their concerns using the specified procedure.

H CORPORATE REQUIREMENTS

21. Taxation

- 21.1 Heads of Departments shall ensure that their Department accounts correctly for VAT and where appropriate corporation tax. Where there is any doubt as to the correct VAT or tax treatment of a transaction, the Taxation Section must be consulted.
- 21.2 Heads of Departments shall ensure that any taxable benefits paid to individuals are reported to the Finance Division for inclusion in P11D returns.

¹ See www.governanceandcompliance.admin.cam.ac.uk/governance-and-strategy/policy-against-bribery-and-corruption (Reporter, 6265, 2011–12, p. 593).

22. Legal Advice and Proceedings

22.1 The Council's Committee on Benefactions and External and Legal Affairs and the Registry have authority to take legal advice and to conduct legal proceedings. Departments shall not take any action to initiate or defend legal proceedings or obtain external legal advice without first involving the Legal Services Division, which will seek consent from the Registry or the Committee as necessary. The Legal Services Division should be contacted immediately if legal proceedings are threatened or served on any part of the University or any University subsidiary company. See also Regulation 23.3 and 23.4.

23. Insurance

23.1 Departments must comply with the insurance requirements set out in Financial Procedures and on the Insurance Section web pages.

23.2 Contents whether owned, borrowed or hired must be valued, recorded, and notified to insurers. Departments should regularly review the value of contents held and notify the Insurance Section of:

- departmental moves;
- the acquisition and disposal of high value items (exceeding £1,000,000); and
- temporary removal from University premises (where the single article exceeds £50,000 or the total exceeds £100,000).

23.3 Departments must take all necessary steps to prevent losses and accidents and ensure that the Insurance Officer is advised immediately of any new unusual or significant risk. Liabilities should not be accepted on behalf of the University without careful consideration. Any liabilities not covered by insurance will fall on the Department.

23.4 Third party claims must be passed immediately to the Insurance Section without comment to the third party to ensure that the University's legal position and insurance policies are not compromised.

24. Overseas Activity

24.1 No Department may enter into any arrangements for activity outside the United Kingdom, unless the Director of Finance gives prior written consent, where this activity involves either or both setting up any establishment and employing individuals overseas. In giving such consent, the Director of Finance shall seek advice from the Legal Services Division and the Taxation Section. The Director may require that external advice is procured at the expense of the Department seeking to enter into such arrangements. Consent shall not be deemed to override the need to take all necessary advice and obtain any other approval from University bodies including the General Board.

I COMMERCIAL ACTIVITY

25. New Income Generation or Trading Activity

25.1 Apart from core teaching, research, and the organisation of conferences, when a new income-generating or trading activity is set up (whether in the UK or abroad), the Head of

Department must consult the Taxation Section beforehand to consider the VAT implications and whether the activity constitutes trading which might be subject to Corporation Tax.

- 25.2 The Director of Finance may direct that transactions be undertaken through a University subsidiary company.

26. University Companies

- 26.1 No University company may be formed, or shares taken in any company (whether in the UK or abroad) for any purpose without advice from the Director of Finance and the prior approval of the Finance Committee, except when done through University of Cambridge Investment Management Limited for investment purposes or by Cambridge Enterprise in relation to the exploitation of intellectual property.
- 26.2 University subsidiary companies shall enter into and keep under review a memorandum of understanding with the University. Each company shall operate in accordance with such memorandum and within the framework provided by these Regulations, including the provisions regarding procurement, and any additional procedural requirements imposed by their boards.

27. Third Parties occupying University space

- 27.1 Heads of Department and ED shall maintain departmental and corporate registers of any third-party organisation occupying University space (Embedded Companies). Heads of Department shall also ensure that procedures are in place to regulate the presence of visitors to the Department, including the signature of visitor agreements as necessary.
- 27.2 Heads of Department shall in respect of Embedded Companies:
- undertake financial and space cost benefit analysis for all new and (periodically for) existing Embedded Companies;
 - comply with Regulation 29;
 - take advice from ED and the Taxation section and seek permission from RMC as necessary
 - ensure that Embedded Companies comply with health and safety requirements;
 - use the University's standard terms and conditions for third party occupation where possible;
 - obtain evidence of Public Liability and employer's insurance annually; and
 - identify, and deal appropriately with, conflicts of interest.

28. Consultancy and Private Activity

- 28.1 When engaging in consultancy or other commercial activity in a private capacity, Staff must not hold themselves out as acting on behalf of the University, use University headed stationery nor (except in accordance with Regulation 29) use any University premises facilities or resources.
- 28.2 The University accepts no responsibility for any work done, advice given, or activity undertaken by Staff in a private capacity. Staff are reminded of the need to take out professional indemnity insurance for such work, advice, and activity and that they are responsible for all liabilities arising including as to tax. Staff who conduct work through

Cambridge University Technical Services Limited are insured under the University's insurance policies.

29. Non-University Activities – Use of Premises, Facilities etc.

- 29.1 Unless the Head of Department gives prior written consent and an appropriate contractual agreement with the University is put in place, non-University activities may not be carried out on University premises nor University facilities or resources used for such activities. Care is needed to avoid breaching any obligation of the University to a third party (for example in relation to use of computing facilities and software).
- 29.2 Heads of Department shall ensure that appropriate charges are made for the use of University premises, facilities or resources for non-University purposes (see Regulation 12).
- 29.3 The Director of the Estates Division must be consulted before making any arrangement (including leases or licences) for the use of any University space for non-University purposes. See also Regulation 27.

30. Intellectual Property

- 30.1 Intellectual property generated through University activities is governed by the Intellectual Property Ordinance granted on 12 December 2005.

J STAFFING

31. Salaries and Staff Appointments

- 31.1 All University employees shall have a properly authorised letter of appointment in the form approved by, or under, the authority of the Human Resources Committee. For the avoidance of doubt the term 'employees' includes temporary and casual workers.
- 31.2 The source of available funding to support the posts or post shall be identified before a member of staff is given a contract of employment.
- 31.3 The only payments which may be made to University employees are those in accordance with approved University salary scales and such other payments as have been specifically approved by the Human Resources Committee. Staff must follow the key principles and rules on expenses reimbursement as set out in the Employees Expense Policy.
- 31.4 Heads of Departments must provide the Payroll Section with and keep up to date a list (signed by the Head of Department) of persons authorised to sign salary documents for departmental staff paid through the payroll. Where the proposed signatory is not a University employee the approval of the Director of Finance is also required.
- 31.5 For all new employees the Head of Department or other authorised signatory shall ensure that the person is legally eligible to work in the UK. The Payroll Section will not add a non-EU citizen to the payroll unless it is clear that any necessary work permit has been obtained or that the immigration status of the person concerned does not require the University to seek permission for the specific employment proposed.

- 31.6 Individuals may not be paid as suppliers through CUFS unless the Taxation Section has given prior written consent including as to the contract terms used.²

K PROPERTY

32. Property

- 32.1 The University's real property is governed by *Statutes and Ordinances* including the Sites and Buildings Regulations.
- 32.2 Departments may not acquire or dispose of real property without taking the advice of the Directors of Finance and of the Estates Division. See further Regulation 6.2.
- 32.3 The University's Taxation Section must be consulted about VAT and the tax implications of property acquisitions, disposals and usage.

33. Stores and Equipment

- 33.1 Stores and equipment shall be dealt with as set out in the *Financial Procedures Manual*. Assets bought with University income irrespective of the source of funding remain the property of the University until sold, gifted, or destroyed, unless contracts with external sponsors specify otherwise.
- 33.2 Fixed asset registers must be maintained (with a minimum requirement for all items costing more than £5,000).
- 33.3 Heads of Departments shall keep full, proper, and correct records of stock. A full stock take must be performed annually between 1 June and 31 July in addition to any regular interim stock takes.

L AUTHORITY

34 Council Delegations and Directions

- 34.1 The Council hereby gives all delegations and directions contemplated by these Regulations.

35. Revision

- 35.1 Every three years, or more frequently if appropriate, the Director of Finance shall arrange for these Regulations to be reviewed and for proposed changes to be submitted to the Finance Committee for onward recommendation to Council and adoption by Council Notice.

² See the FD3 process at www.finance.admin.cam.ac.uk/finance-staff/tax/fd3-employment-status-referral-form
<https://www.finance.admin.cam.ac.uk/finance-staff/tax/fd3-employment-status-referral-form>

M EXPLANATORY NOTE

- The University endeavours to conduct University Business in accordance with the Nolan Principles³:
- The Council is the principal executive body and policy making body of the University. The Council has general responsibility for administration, planning of work, management of resources and general supervision of finances.⁴ It has the authority to take legal advice and conduct proceedings on behalf of the University.⁵ The Council and its Finance Committee exercise the University's powers of investment subject to certain restrictions.⁶ The Council has responsibilities in relation to the care, management, and maintenance of property⁷.
- The Vice-Chancellor has the customary rights and duties of the office⁸ and is the designated officer responsible to the Public Accounts Committee.
- Pro- Vice-Chancellors perform duties as prescribed by *Statutes and Ordinances*, the Council or the Vice-Chancellor.⁹
- Heads of University Departments and Secretaries of Faculty Boards have financial responsibility under *Statutes and Ordinances* and are accountable for the proper application of funds.¹⁰ Heads of other institutions are similarly responsible under particular provisions of *Statutes and Ordinances*.
- Acting Heads of Department may be appointed during a vacancy and count as Head of Department. The General Board appoints Deputy Heads and defines their duties and powers.¹¹
- The Registry is the principal administrative officer of the University under the direction of the Council and is the head of the Unified Administrative Service.¹²
- The University Offices form the Unified Administrative Service under the supervision of the Council and are organised in Divisions.¹³
- Special Ordinance A(viii) 4 provides for delegation by any University body to any committee or University officer (including in relation to finance) subject to *Statutes and Ordinances*.
- The Audit Committee has responsibilities under *Statutes and Ordinances*. The University's internal and external auditors have unrestricted access to all records, assets, personnel and

³ See the University's Corporate Governance Statement, annexed to the University's Annual Reports and Financial Statements. Footnote 2

⁴ Statutes A IV 1, A VI 1(a), C I 1(c) and F I 1(a).

⁵ Ordinances Chapter I, The Council, Legal Powers.

⁶ Statute A II 6(b) and Ordinance Ch XIII, Financial Matters, Regulation 6.

⁷ Statutes A II 3 and F II 2-3

⁸ Statute C III 3.

⁹ Statute C III 17.

¹⁰ Statute A V 17(c).

¹¹ Ordinances, Chapter IX, Departments and Heads of Department, Regulations 4 and 5.

¹² Statute A V1 1

¹³ Ordinances, Chapter XI, Special Regulations for University Officers, Unified Administrative Service, Regulations 1 & 2. Footnote 12

premises and the right to obtain such information and explanations as they consider necessary. The OfS, Research England, HEFCE, HM Revenue and Customs, and others may also have the right to audit University Business.

- The purpose of the EU Public Procurement Directives and implementing UK Regulations is to encourage competitive tendering for public contracts throughout the European Union. The Council, on the advice of their Finance Committee, reviews and confirms annually whether the University remains outside their scope. The Council intends that the University's procurement procedures should continue to follow the good practice set out in the Regulations.
- In addition to compliance with Financial Regulations Staff must also comply with the requirements of *Statutes and Ordinances* and the Sites and Building Regulations.
- Ethical guidance on acceptance of donations and the provisions for acceptance of donations by or with the authority of the Vice-Chancellor are set out in Ordinances.¹⁴

¹⁴ Ordinances, Chapter XIII, Council Notice: Ethical Guidelines on the Acceptance of Benefactions.

SCHEDULE 1- COMPETITION PROCEDURES

Consult Schedule 2 for the meaning of all words beginning with a capital letter.

In particular the contract value must be calculated per the definition of Total Value.

Total Value (before VAT)	Procedure for inviting offers		
	Framework Contracts	Marketplace	Other purchases
<£5,000	Follow procedures recommended by Procurement Services for the contract.	Only the price from the Marketplace is required.	Written price confirmation.
£5,000- £25,000			Three Written Quotes.
>£25,000 - £50,000		Three Written Quotes or three Written Proposals, depending on complexity, risk and value of the purchase (see the guidance in Procurement Procedures).	
>£50,000		Three Tender Submissions.	
> £100,000	Procurement Services must be consulted/involved and agree the most appropriate procurement method.		

Notes

1. Competition procedures are applicable unless a dispensation has been granted in accordance with Regulation 18.3. Non-exhaustive examples of when a dispensation might be appropriate are.
 - Sole source supply necessary in the following circumstances:
 - technical compatibility e.g. upgrade to an existing solution or purchase of additional goods which must be compatible with existing goods;
 - protection of technical rights;
 - single provider (membership of a professional institute/proprietary training);
 - purchase of, or repairs to, goods or materials, including machinery or plant, available only as proprietary or patented articles;
 - the work to be executed or the goods/services to be supplied constitute an extension of an existing contract where a change of supplier would cause:
 - o disproportionate technical difficulties;
 - o diseconomies, or
 - o significant disruption.

- Other reasons might include:
 - a one-off, unique opportunity which offers significant value;
 - extreme urgency, which was unforeseeable and is not attributable to the requester and which precludes the invitation of quotations or tenders.

2. The expectation is that, where the required goods are available, purchases up to £25,000 will be made via the Marketplace or under a Framework Contract. Other offers should not be sought, unless better value can be achieved elsewhere, in which case Procurement Services must be notified so that any price discrepancies and inclusion of the supplier on the Marketplace can be explored.

SCHEDULE 2 – DEFINITION, ADVICE AND GUIDANCE**Definitions and Interpretation**

Bribery	As defined in the University's Policy against Bribery and Corruption.
Certifying	Completion of Procurement Services' on-line dispensation form.
Construction Related Procurement	The procurement of goods or services which could not be procured separately from the construction or alteration of a building (for example lift maintenance, the procurement and installation of equipment including air conditioning are not Construction Related Procurement).
CUEF	The Cambridge University Endowment Fund in which the main University endowments are pooled.
CUFS	Cambridge University Financial System.
Department, Head of Department	As defined in Regulation 4.1
Deposit Account	A University wide facility that allows Departments to invest surpluses.
ED	The University's Estate Division
Embedded Company	A third-party organisation (often but not always a company) occupying University premises or whose employees' normal place of work is on University premises, other than as temporary visitors or to provide services to the University.
Environmental Sustainability Policy	As published from time to time by the Council ¹⁵
Framework Contract	Any framework contracts approved by Procurement Services.
Fraud	As defined in the University's Policy against Bribery and Corruption.
Investment Board	The board which manages for the University the investment of the CUEF.
Leasing	A third party (including a supplier or a finance company) makes available for the University's use assets owned by the third party (ownership never vests in the University), for which a rental payment is made for a period of use; as distinct from an arrangement which amounts to borrowing to fund the possible acquisition of assets.
Marketplace	Any supplier catalogue or process for obtaining offers which is made available electronically through CUFS.

¹⁵ www.environment.admin.cam.ac.uk/files/environmental_sustainability_vision_policy_and_strategy_for_web.pdf.

Nolan Principles	The seven principles identified by the Committee on Standards in Public Life.
Planning and Resources Committee	Planning and Resources Committee of the Council and the General Board.
Procurement Services	The University's Procurement Services section of the Finance Division.
Procurement Procedures	The guidance and model documents on procurement in the Financial Procedures Manual or published on the Procurement Services web pages.
Proposals	Bona fide, comparable Written bids submitted by a specified date (the Procurement Procedures provide sample documentation).
Quotes	Bona fide, comparable Written quotations (the Procurement Procedures provide sample documentation).
Staff	All employees, including temporary and casual workers, irrespective of whether their appointment specifically includes financial responsibilities and however their employment is financed: together with anyone else who has any responsibility for the administration, management or expenditure of any University Income or conducts any University Business.
Tender Submissions	Formal tender documents submitted by suppliers in response to an Invitation to Tender.
Total Value	The contract value or estimated value as follows: <ul style="list-style-type: none"> (a) fixed period contract - the total price to be paid or which might be paid, during the whole of the period; (b) recurrent transactions for the same type of item - the aggregated value of those transactions in the coming 12 months; (c) uncertain duration - monthly payment x 48; (d) feasibility studies - value of the follow-on scheme; (e) the aggregated value of separate contracts meeting a single requirement.
University	The Chancellor, Masters and Scholars of the University of Cambridge.
University Business	University business which has a financial impact.
University Income	All monies, regardless of source or purpose, which are due or paid to the University or made available to individuals because of their association with the University, including donations.
Written	In writing, including submission by fax or email or using web tendering facilities provided by the University.

Terms are to be understood as used in *Statutes and Ordinances* unless the context of the Regulation requires otherwise.

Words preceding 'include', 'includes', 'including' and 'included' shall be construed without limitation by the words which follow those words.

Further Guidance is contained in:

- the Financial Procedures Manual;
- Web pages of:
 - Finance Division (including Procurement Services and Insurance);
 - Research Operations Office;
 - Human Resources Division;
 - Governance & Compliance Division (Information Compliance Office);
 - University Information Services;
 - Legal Services Office; and
 - Cambridge Enterprise (for Cambridge University Technical Services Limited).

The authority of the officers to conduct legal proceedings: Notice

7 December 1998

The Council have considered the remarks made at the Discussion, held on 17 November 1998, of the following topic of concern to the University: the ruling, made by the Vice-Chancellor's deputy appointed to consider a recent representation under Statute K, 5, which relates to the authority of the officers to conduct legal proceedings (*Reporter*, p. 190).

The Council wish to clarify their position on a number of matters of general principle. They do not believe that it would be helpful to comment on questions on which individuals are currently in dispute with the University, except insofar as this is necessary to illustrate a general point.

1. Dr Edwards argued that the regulation governing the Council's legal powers (*Statutes and Ordinances*, 1998, p. 120) should be construed as meaning that no body other than the Council is empowered to undertake legal proceedings on behalf of the University (except, of course, bodies which are explicitly so empowered by Statute or Ordinance). The Council agree with Dr Edwards that the circumstances of the enactment of this regulation in 1968 clearly indicate that this was the intention behind it. However, this has no bearing on the propriety of delegation by the Council to its officers. The Vice-Chancellor's deputy indicated in his ruling that it has been settled practice for many years for the principal officers to undertake legal proceedings, acting as delegates of the Council, and that there is no impropriety in such delegation.

2. While it would be open to them to do so, the Council do not propose to withdraw the authority exercised by their principal officers in this way. They agree with the point made by Professor Mellor that the good order and management of the University depend on such arrangements and would be prejudiced if the officers' ability to act in individual cases, particularly those involving matters which are personally sensitive for individuals, required the specific authority of the Council.

3. The Council wish to make clear that officers on the staff of the Old Schools have customarily reported to the Council any significant legal matter affecting the University. That they have not advised the Council of every legal matter reflects the enormous range of legal advice and action in which an organization as large and complex as the University inevitably finds itself involved. However, to ensure that the officers have a proper framework within which to act, the Council approved new procedures during 1997-98 under which responsibility for these matters is exercised through the Registry, reporting to the Executive Committee, which is a statutory committee of the Council (Statute A, V).

4. Statute K, 5 provides for a representation to be made to the Vice-Chancellor by anyone who believes that there has been a contravention of the Statutes or Ordinances. On this occasion the Vice-Chancellor, as he was entitled to do, referred the representation from Dr Griffin to a deputy, who inquired into the matter and declared that there had been no contravention. The deputy was acting for the Vice-Chancellor, and in reaching this conclusion he was therefore taking a decision on a question which had been remitted to him; he was not reporting to the Vice-Chancellor on a matter on which the Vice-Chancellor was to take action. The Council do not accept Professor Dumville's interpretation of the deputy's status in acting for the Vice-Chancellor; they wish to clarify their position on this important issue.

5. Statute K, 5 further provides that: 'if they are dissatisfied with [the Vice-Chancellor's] decision, any fifty members of the Regent House may within one week appeal in writing to the Chancellor, whose decision shall be final. If there is no such appeal, the decision of the Vice-Chancellor shall be final.' No appeal was made against the decision of the Vice-Chancellor's deputy either in respect of the matter raised by Dr Griffin or in respect of that raised earlier by Dr Evans. Accordingly, the decision is final. Nevertheless, the Council reiterate that they have introduced, through the Registry, arrangements to ensure that they are properly informed about such matters.

6. The finding of the Vice-Chancellor's deputy that it is 'reasonable and generally recognized usage of the University for contracts of employment in respect of General Board institutions to be made by, and where necessary terminated by, the Secretary General' has been taken out of context in the remarks made by Dr

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Evans and Professor Dumville. It is clear that the Vice-Chancellor's deputy was dealing with a specific allegation. In that context he found that it was a necessary incident of the making or termination of contracts for the principal officers to defend legal proceedings, to make final offers of settlement, and to agree terms as well as to incur reasonable expenses. It was not said in the ruling, as alleged by Dr Evans, that 'the Registry and the Secretary General and other Administrative Officers really can hire and fire at their own discretion'. Although they have the power to make and terminate contracts, their discretion has to be exercised in accordance with the Statutes and Ordinances of the University, including Statute U, and with the terms of individual contracts of employment and the recognized usages and practices of the University.

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Cambridge University Reporter, 9 December 1998
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Chapter 3: Code of Practice for members of the Council

Introduction

1. This Code provides advice and guidance to members of the Council about their legal and other responsibilities, and about the conduct of members in meetings and otherwise in dealing with Council business, and in acting as members of the Council. It is re-adopted annually and published on the Council website as part of the Council Handbook.
2. In some respects aspects of the Code are binding on members of the Council, because they derive from obligations binding on all members of the University, or binding on individuals acting in managerial or governing capacities within organisations such as the University, under the ordinary law including Charity law. In other respects the Code is advisory, but members of the Council are expected to follow it.

The Code of Practice

3. Members of the Council must abide by the law relating to Charity functions, to persons in fiduciary positions, and by the Statutes, Ordinances and Orders of the University, so far as the Ordinances and Orders are consistent with the statutory responsibilities of the Council.
4. Members of the Council must satisfy the [fit and proper persons criteria](#) as set out by the Office for Students (OfS) Regulatory Framework to be eligible to act as a charity trustee. Members are required promptly to [notify the Registry](#) (or, in her absence, [the Director of Governance and Compliance](#)) concerning any relevant changes in circumstances in this regard during their term of appointment.
5. The proceedings of the Council are regulated by standing orders, adopted by the Council and revised from time to time (see [Chapter 4 of the Handbook](#)).
6. In addition, there are conventions applying to the conduct of members of the Council:
 - a. Members of the Council should address themselves to the interests of the University as an institution, having proper regard to their own particular knowledge of particular activities, domains, or institutions in the University (for example, as a student, as a College Tutor, or as a head of a University department).
 - b. Members of the Council must declare any personal or prejudicial interest in any matter before the Council, either at a meeting, or by circulation; a member of the Council wishing to remain for the discussion of that matter at a meeting must abide by the decision of the chair of the meeting (or in the case of business being conducted by circulation by the signatory of the circular) as to whether the member remains at a meeting and as to whether

the member may take part in deliberation on the matter. Normally, a member of the Council who has an interest in a matter dealt with by circulation should not sign a Report, or should sign with a note indicating that they have declared an interest. These matters are regulated also by standing order. For registration of interests see also (h) below.

c. Members of the Council should not, in debate, impugn the integrity of University staff, misrepresent the motives of members of the Council, or personalise onto the Vice-Chancellor decisions which were those of the Council collectively, even if arrived at by a majority decision.

d. [Statute AX4](#) provides that Reports shall be signed by members of the reporting body who agree with the Report. A member of the Council who fundamentally disagrees with a decision of the Council, for example with a particular recommendation of a Council Report, would not normally sign the Report (or if disagreeing in part could sign subject to a note of partial dissent). A member of the Council who disagrees sufficiently strongly may wish to make an explicit statement of dissent. A member of the Council who only has reservations in minor respects with a proposal may wish to sign without a note of dissent.

i. Members of the Council who are appointed by it to serve as such on other bodies, e.g. the General Board or the Finance Committee, serve fully as members of those bodies, but should also explain the Council's view at them, even if they do not entirely or wholly share it. When appropriate they should report the views of the other bodies to the Council, even if they do not agree with them.

ii. Members of the Council who are appointed by it to serve as such on committees of the Council itself, or joint committees of other bodies, should similarly explain the view of the Council and as necessary report back.

e. As the charity trustees of the University (in other words of the corporation constituting the University, which does not include the Colleges) members of the Council owe fiduciary duties to the University and must set aside personal interests in dealing with University affairs.

f. Members of the Council who need to discuss any matter arising from the code of practice or other conventions or requirements affecting membership should consult the Secretary of the Council ([the Registry](#) or in her absence [the Director of Governance and Compliance](#)), or in cases of sufficient importance the Chair of the Council ([the Vice-Chancellor](#)). They should normally abide by the advice given. If they are unable or unwilling to abide by the advice they should explain to the officer giving their reason, and indicate at the relevant meeting, or in connection with any views expressed in writing or by

circulation, their reasoning. The officer may need to report the matter to the Council for decision.

g. Members of the Council must record their material and other personal interests which could be considered prejudicial to their role as a member of the Council in the annual declaration of interests form. A summary of these interests is published [on the Council's website](#). Declaration of interests in relation to the agenda other than those already declared in the register of interests, should be noted at the start of each meeting, even if they have been previously declared (see (b) above).

h. In the absence of specific authority, members of the Council have no power as such to act on behalf of the Council or the University.

Seven principles of public life (the 'Nolan' principles)

7. Members of the Council should have particular regard to the [seven principles of public life](#) as identified by the Nolan Committee on Standards in Public Life:

- a. **Selflessness:** Holders of public office should act solely in terms of the public interest.
- b. **Integrity:** Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- c. **Objectivity:** Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- d. **Accountability:** Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- e. **Openness:** Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- f. **Honesty:** Holders of public office should be truthful.
- g. **Leadership:** Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

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.

Current members of staff

Professor Maha Abdelrahman
Professor Andrew Arsan
Professor Caroline Bassett
Professor Gábor Betegh
Professor David Buscher
Professor Jon Crowcroft
Professor Michael Degani
Professor Lucy Delap
Professor Graham Denyer Willis
Professor Mette Eilstrup-Sangiovanni
Professor Hamza Fawzi
Professor Priyamvada Gopal
Professor Mia Gray
Professor Henning Grosse Ruse-Khan
Professor Nicholas Guyatt
Professor Aaron Hornkohl
Professor Alexandre Kabla
Professor Mary Laven
Professor Sian Lazar
Professor Charlotte Lemanski
Professor Jean Michel Massing
Professor Emma Mawdsley
Professor Drew Milne
Professor Clément Mouhot
Professor Yael Navaro
Professor Susan Oosthuizen
Professor Esra Ozyurek
Professor Fred Parker
Professor Judy Quinn
Professor Michael Ramage
Professor Surabhi Ranganathan
Professor Alice Reid
Professor Pauline Rose

Professor Yusuf Sayed
Professor Jason Scott-Warren
Professor Sujit Sivasundaram
Professor David Sneath
Professor Bert Vaux
Professor Clair Wills
Professor Ross Wilson
Professor James Woodcock

Professor Emeritus Zygmunt Baranski
Professor Emeritus Richard Farndale
Professor Emeritus Raymond Geuss
Professor Emeritus Charles Jones
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Mr Michael Abberton
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Dr Anne Alexander
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Goodhart Visiting Professor of Legal Science Antony Anghie
Miss Sophie Anson
Ms Freya Arthure
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Ms Reham Elwakil
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Dr Kareem Estefan
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Dr Evelina Gambino
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Ms Katerina Gargaroni
Dr Kaoutar Ghilani
Anthony Godsell
Dr Caroline Gonda
Mr Guy Goodrick
Dr Thomas Graff
Mr. Christopher Greenberg
Dr Safet HadžiMuhamedović
Dr Susanne Hakenbeck
Sarah Hammond
Dr Scarlet Harris
Dr Amelia Hassoun
Ronald Haynes
Mrs Alice Hehir
Dr Nicole Helwig
Dr Lena Holzer
Dr Richard Hopper

Dr Julia Hori
Dr Jana Howlett
Dr Michael Hrebeniak
Dr Iza Hussin
Dr Jasmin Jahic
Dr Michael Joseph
Dr Dino Kadich
Dr Nancy Karreman
Alina Khakoo
Dr Philip Knox
Dr Tor Krever
Dr Ekin Kurtic
Anne Lacour
Dr Jef Laga
Mrs Lauren Lalej
Mrs Anna Langley
Mr Tony Leech
Dr Max Long
Mr Oly Longland
Dr Saite Lu
Dr Hannah Lucas
Mr Martin Lucas-Smith
Dr Janine Maegraith
Dr Flavia Mancini
Dr Giovanni Mantilla
Dr Bruno Marinic
Frances Marsh
Dr Chiara Martini
Ms Kat McCartney
Dr Laura McMahan
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Dr. Kathryn Moeller
Dr Jenny Carla Moran
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Dr Vincenzo Vergiani
Dr Jennifer Wallace
Ms Jackie White
Dr Claire Wilkinson
Dr Timothy Winter
Dr. Mary Wrenn
Dr Evan Wroe
Dr Atiyeh Y
Dr Ksenia Zanon
Dr Doriane Zerka

Dr Andrew Zurcher

Students Union officers and student societies

Elleni Eshete, Cambridge SU
Maroof Rafique, Cambridge SU

Cambridge University Ahlul Bayt Islamic Society
Cambridge University Islamic Society
Cambridge University Middle Eastern and North African (MENA) Society
CU PalSoc
CUAFC
Faculty of Education Research Students' Association (FERSA)
Fitzwilliam College JCR
Fitzwilliam South Asian Society
FUSE
Gender Agenda: Cambridge Feminist Collective
Lucy Loves the Arts
Newnham Feminist Society
Queens' for Palestine
Socialist Worker Student Society Cambridge
Sociology Society
Somali Society
St Catharine's College Islamic Society
The Cambridge Majlis
Union of Clare Students

Current students

Mr Yosef Abdelhalim
Miss Karima Abdou
Mr Tawab Abdul
Ms Sheymae Abdulkader
Florence Adams
Ms Miranda Addy
Mr Muhammad Afzal
Mr Sheikh Afzal
Daniel Aguilar
Miss Daniyah Ahmed
Miss Farah Ahmed
Mr Mahi Ahmed
Mr Ashraf Ahmed

Mr Riyad Ahmed
 Mr Shafi Ahmed
 Miss Sabrine Ahmed
 Miss Jaziba Ahmed
 Mr Sakib Ahmed
 Mr Miraj Ahmed
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 Miss Sadia Akhter
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 Charlie Beevers
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 Meg Bennett
 Ms Catherine Benson
 Maira Benthane
 Me Paulius Bergaudas
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 Nynke Blömer
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 Elizabeth Bratton
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 Musst Leana Carbonez
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 Theodore Chen
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 Miss Mariya Chowdhury
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Miss Mia Da Costa
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mr alexander davies
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Sarah Fitri
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Miss Daisy Freeman
Ms Rosie Freeman
Miss Akua Frimpong
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Miss Niamh Gallagher
Ms Hannah Gallagher-Syed
Miss Tejomayee Ganesh
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Quinton Gardiner
Ms Martha Gazzard
Daniel Ghazi
Ms Candela Gil
Walter Goldberg
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Lily Goulder
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Louisa Graves
Miss Lara Greening
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Maddy Guha
Ebru Gurbuz
Miss Imaan Haider
Miss Eve Haines
Mr Oscar Hamilton
Mr Oscar Hamilton
Mr Keane Handley
Mr Omar Hanish
Mr Owen Hanks
Mr Caleb Harniess
Mr Archie Harper
miss talulla harris
Miss Anise Hartley
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Mr Amir Hassanali
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Miss Sabrina Hossein
Miss Grace Howard
Miss Lily Howard

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Peach Hoyle
Haley Huang
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Mr Isaac Jackson
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Lia Joffe
Anoushka Johar
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Mr. Ewan Jones
Ms Jenny Jones
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Mariame Karzazi
Ms Imaan Kashim
Mr Damir Kayani
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Billie Kilburn
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Mr Felix Kind
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Mr William Kirby
Ms Elsa Kobeissi
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Associate Professor Asma Zubairi

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 Ms Natasha Wardle
 Miss Alice Warrington
 Mr William Wearden
 Me Robin Webber
 Nell Whittaker
 Mr Paul Wilkinson
 Wan Woo
 Dr Tristram Wyatt

Professor Lesley Wylie
Miss Sumaya Yasmin
DR Syed Ali Zaidi
Miss Lisha Zhong

First Witness Statement of Jason Scott-Warren
Intervener
JSW1-3
12 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
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

FIRST WITNESS STATEMENT OF JASON SCOTT-WARREN

I, Jason Scott-Warren, of Gonville & Caius College, Trinity Street, Cambridge CB2 1TA will say as follows:

1. I am Professor of Early Modern Literature and Culture in the Faculty of English, University of Cambridge, and a Fellow of Gonville & Caius College.
2. I am an elected member of the University Council, the 25-strong body of Trustees of the University, which is described on public-facing web pages as follows:

‘The University Council is the principal executive and policy-making body of the University. It has overall responsibility for the administration of the University, for defining its mission, for planning its work and for the management of its resources. It has the power to take such action as is necessary to discharge these responsibilities and, in carrying out its functions, consults the Regent House [the legislative body and principal electoral constituency of the University, comprising over 7,200 members of the academic, senior research and senior administrative staff] on questions of both decisions and policy.’

3. As a Council we had over the course of the past year approved the approach which our senior administrators adopted in response to the Cambridge for Palestine encampment outside King’s College, an approach based on engagement and dialogue rather than punitive measures, police interventions and forced removals. Accordingly, the encampment came to an end in mid-August thanks to a negotiated agreement with the students (**Exhibit JSW1**) and this created an ongoing process which formally involved the Council, as set out in the Notice from the Council dated 7 November 2024 (**Exhibit JSW2**). Council members were also mindful of the views of many Regent House members on the topic, expressed in a Grace (a formal proposal) advocating for divestment from the arms trade, which while it did not specifically mention Israel clearly overlapped with student demands (**Exhibit JSW3**).
4. At its meeting on 27 January 2025, which I attended, Council members were presented with a short statement from the Registrary about the occupation of Greenwich House and the encampment on Senate House Yard which had prompted the relocation of the November degree award ceremony to Great St Mary’s Church. We were told that the University administration was considering possible preventative actions to ensure that future graduation ceremonies could take place in Senate House, and that potential legal steps included applying to the High Court for a precautionary injunction.
5. While nobody on Council objected to the emergency injunction that had been taken out to protect confidential information that may have been obtained during the occupation at Greenwich House, several questions were raised about the proposed, much wider injunction. The discussion touched on the contrasting responses of Oxford and Cambridge to occupations, with academics on the committee praising the less interventionist approach hitherto taken by

the University and urging the administration to continue to expand the dialogue with student protesters, rather than pursuing legal and disciplinary action. I asked about the likely cost of any legal action, a matter of significant concern when the University is in deficit, and my question was not answered (a subsequent email on this question also went unanswered). I also asked what the University would do in the event of a breach of the injunction; would it pursue its own students for financial recompense, landing them with hefty fines and possibly with custodial sentences? I was informed that the University had no intention of jailing its own students.

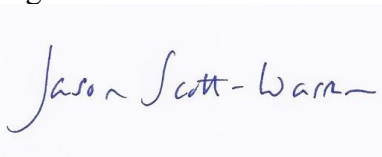
6. My impression was that this matter would be brought back for further consideration at a future meeting, but no mention was made of the Injunction at the meeting of 10 February 2025, and the University went ahead with its application to the Court without further consultation.

7. In the ordinary course of affairs, for a decision as serious as this—a request for a five-year injunction on protests on a particular issue, affecting not just demarcated spaces but also public roads—the agreement of Council, elicited with tabled papers and a vote, would be expected. The University administration was for example extremely careful to establish lines of delegated authority during Covid, consulting Council repeatedly to reassure itself about the procedures that were being followed; more recently, it has called Extraordinary Meetings on matters of pressing concern, or has ensured that they are given extended consideration at a Council awayday. I am concerned that due process was not followed in this matter of substantive importance. In the light of the failure to consult the University via the Council or via Regent House, the claim of the application to represent the will of the University cannot be justified.

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 that reads "Jason Scott-Warne". The signature is written in a cursive style and is placed on a light blue rectangular background.

Dated: 12 March 2025

First Witness Statement of Jason Scott-Warren
Intervener
JSW1
DATE 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
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
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(C) THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN

Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT "JSW1"

Notices

Upholding our values: responding to calls from our university community

Last updated: 01 Aug 2024

We have been in dialogue with our students for several weeks about the humanitarian tragedy unfolding in Gaza. We have respected their right to protest within the law and in line with the community guidelines they set out. At all times we have been aware of the impact of the encampment on our wider community and provided support and reassurance during what has been a difficult time.

The group has asked several questions about University policy, and we have agreed to explore a number of these through our governance processes. This is set out in the following statement.

The future actions in this statement are contingent on the encampment closing down.

This has been a challenging year for many in our community. A group of our students has expressed their deeply felt anguish at the humanitarian tragedy unfolding in Gaza, in the form of their encampment on King's Parade, their recent resolution at the Cambridge SU Student Members' Meeting, and the views that have formed the basis for the constructive dialogue between members of the University's senior leadership team and delegates on behalf of the protesting students.

The University firmly supports its students' right to academic freedom, freedom of speech and the right to protest, all within the law. This has guided our approach to the protests, and our willingness to engage empathetically with all members of our community. We are also aware that there are differing views on the conflict, and that upholding freedom of speech must, under no circumstance, allow for the unlawful discrimination, bullying, intimidation or harassment of any individual or group in our community. We abhor anti-Palestinian racism, Islamophobia, antisemitism and any other forms of racism. We call on members of our community to continue to treat each other with empathy and civility. Our

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priority is, and will remain, the safety and wellbeing of our staff and students. We therefore continue to welcome the peaceful conduct of the protests so far, including protesters' adherence to their stated community guidelines.

The Office for Students has written to us and other universities to remind us of our legal duty to protect freedom of speech and the right to protest within the law, and also to ensure that protests do not disrupt the University's essential functions or affect the education and wellbeing of other students. The vast majority of taught students have now completed their academic degrees and have been able to enjoy well-earned celebrations at the end of a difficult year.

From the start of this most recent escalation in violence, we have been in very frequent contact with students and staff who have been directly impacted by the war, including members of our Palestinian and Israeli communities, and others who have been directly and indirectly affected by the conflict. We will continue to maintain this vital dialogue and to provide support for our students. We have focused on balancing rights and responsibilities during this difficult time. The right to protest, debate, and challenge ideas, is fundamental to our role as a university, but we do not want any one in our community to feel frightened or unwelcome. Many members of the most directly impacted communities believe that we can, and should, be doing more. We are committed to being a supportive and compassionate institution, and continue to explore how we can provide additional support to those most directly impacted by significant conflict or humanitarian crisis.

One recent response has been the launch of the new Humanitarian Response Fund (HRF). (<https://www.cam.ac.uk/notices/news/university-humanitarian-response-fund>), to help to meet unexpected shortfalls in living costs, as well as exceptional caring responsibilities associated with conflict or crisis, including that in Gaza. The initial contribution from the central University is £100,000, and we encourage others, including Colleges and Departments, to contribute in order to sustain this Fund. A number of initial applications to the HRF have already been received, and processed.

Investments

The University's approach to investment is one of the key issues raised by protesters. The Cambridge University Endowment Fund's (CUEF) investment model is to invest via third-party fund managers. The CUEF invests donations made to the University, its Colleges and associated charitable trusts; and makes distributions to support the University. All investments in the CUEF are made following an extensive due diligence process as well as compliance with all applicable laws. Distributions from the CUEF play an indispensable role in the University's Finances. The CUEF is overseen by the Cambridge University Endowment Trustee Body (CUETB), which has set out Responsible Investment Principles. The CUETB defines Responsible Investment as an approach to investment that explicitly acknowledges the relevance to the CUEF of environmental, social and governance factors.

The Students' Union approved motion, various college-level approved motions, and the students protesting with the Cambridge Encampment for Palestine have expressed concern to us that our current investment may not be in line with our institutional values, especially in relation to the arms/defence industry. The University recognises the strength

of feeling within the community. We therefore commit to working with the Task Force and the Working Group (see roadmap below) to review our approach to responsible investment. This will include consideration of ways of defining and monitoring defence exposures within investment portfolios. For the University, as investor in the CUEF, the relevant bodies involved in such a review are the Finance Committee, the Committee on Benefactions and External and Legal Affairs (CBELA), and University Council, working closely with the CUETB. The outcome of this review, and any proposed changes, will be communicated to the CUETB within the timelines mentioned in the roadmap below.

Partnerships and research

The groups that have been making representations to us have requested that we consider our academic partnerships and research relationships. We believe in openness and transparency in our global partnerships. Our mission is to contribute to society through the pursuit of education, learning and research at the highest international levels of excellence. To that end, we engage with universities and academic institutions around the world, and across all fields of academic activity. We expect our global partnerships to be academically driven. When considering who we work with, we rely on a robust process overseen by Committees such as CBELA and the Research Policy Committee. CBELA considers reputational issues in relation to sources of funds for research collaborations and donations. It can take into account ethical considerations in its assessment of reputational risk. CBELA membership includes elected members of the Council including a student member of the Council.

The University's Research Policy Committee has oversight of strategic relationships with research partners, as well as oversight of industry and international partners in research. The Advisory Group on Research Purpose advises CBELA on certain sources of funds and could in future play a role in advising on collaborations with defence companies. The University commits to reviewing the guidelines that inform academic and industry research ties and collaborations with companies including those falling within the arms/defence category, working through the relevant University committees, and in dialogue with the working group and task force (see roadmap below). Should these reviews propose any change in approach to research partnerships, these will be implemented by the relevant Committees and/or administrative units of the University.

Support for academics and students at risk

The University welcomes students from around the world, including conflict zones. We are an open and international community, and the city of Cambridge itself has City of Sanctuary status. In February 2024 the University of Cambridge signed the pledge to become a University of Sanctuary. It will submit its full application in September 2024, which is the next available opportunity, with active involvement and support from the Colleges. In addition, Cambridge supports the Council for At-Risk Academics (CARA) (<https://www.cara.ngo/>), an organisation that provides urgent assistance to academics facing immediate danger, forced exile, or who choose to continue working in their home countries despite significant risks. In October 2023, the University increased its support to CARA's Fellowship Programme, enabling it to welcome up to three more Palestinian fellows

per year. The University commits to increasing its funding to CARA and the Rowan Williams Fund (<https://www.cambridge-trust.org/scholarships/rowan-williams-cambridge-studentship/>) to enable the number of Palestinian fellows supported to increase in the academic year 2024-2025 and onwards. As a result of this commitment, a Palestinian scholar has already been accepted to come to Cambridge shortly with their family.

We share the horror of our students at the loss of life, and the appalling destruction of education institutions and infrastructure in Gaza. We are keen to convene and support the processes of reconstruction that will follow the cessation of violence, building on knowledge and expertise within Cambridge (including our colleagues in the Faculty of Education and Cambridge University Press and Assessment), and committing our own networks and resources to ensure that these processes reflect the needs of the Palestinian people. The University also commits to expanding the academic support schemes open to impacted Palestinian students through (but not limited to): undergraduate and postgraduate scholarships, fully funded residential placements for visiting doctoral students, fully funded residential placements for academics, clinical placements for medical students, individual grants for researchers from Palestine.

In addition, the Institute for Continuing Education (ICE) (<https://www.ice.cam.ac.uk/>) has recently offered places to Palestinian students to attend the University of Cambridge's International Summer Programme (<https://www.ice.cam.ac.uk/courses/international-summer-programmes>) free of charge. Using a combination of sources, ICE, participating colleges and the University will cover the cost of the tuition and accommodation for the period of the course, and travel, visas and other expenses.

We will work with our colleagues in the University's Development and Alumni Relations office, and with Colleges, to raise additional resources to support these efforts. Work on these programmes will begin as soon as possible, with a particular focus on new scholarships being available for the next admissions cycle (for arrival in October 2025).

Roadmap and commitments

We are aware that the students who have been participating in the protests are seeking firm commitments and a clear roadmap. In light of where we are in our current academic cycle, many of the governance processes that comprise that roadmap will not convene till the start of the new academic year. This is not a reason for inaction in the intervening period, and we propose to establish a working group that will continue the dialogue that has already started, which will work through the summer and prepare for input into the committees that are responsible for next steps, beginning with their first meetings. The University fully commits to this process and its various streams of work. We will ensure that the review processes relating to responsible investments and research relationships outlined in this document take place rapidly during Michaelmas Term 2024, with the aim of arriving at initial positions by the end of the term. The University will also keep the community updated on progress throughout.

We are also aware that the students would like their views to be represented in the consideration of these important issues and have proposed to set up their own task force, which will form part of the working group that we intend to establish. We welcome this

engagement. We expect that this task force will elect its own members, and will be self governing. Members of the task force will become part of the wider working group, which will be expected to make recommendations to subsequent meetings of the relevant governance committees that oversee policies in relation to research, investments and partnerships. The overall process will be conducted in a spirit of collaboration and transparency and there will be an iterative dialogue between the University's committees and the task force as well as the working group throughout the development of the policies. We will treat the opinions of the students on the task force with respect, and expect the working group to develop consensual approaches to arrive at their recommendations. The wider University community will be provided with regular updates on progress towards these commitments made by the University, its relevant committees, branches, or institutions, and the working group.

As we write this, our thoughts remain with all those who are affected by the tragic events taking place in Gaza, other parts of Palestine, Israel and elsewhere, and we hope that the painful process of rebuilding lives and institutions can start in earnest. This will be a long journey, and we are committed, as an institution, to playing our part in these processes.

Professor Deborah Prentice, Vice Chancellor

Professor Kamal Munir, Pro-Vice-Chancellor for University Community and Engagement

Professor Bhaskar Vira, Pro-Vice-Chancellor for Education



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Published

17 Jul 2024

First Witness Statement of Jason Scott-Warren
Intervener
JSW2
DATE 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
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

EXHIBIT "JSW2"

NOTICES

Calendar (p. 111)

Discussion on Tuesday, 10 December 2024 (p. 111)

Notice of a benefaction (p. 111)

Amending Statutes for Magdalene College (p. 111)

Statutes approved (p. 111)

Grace for submission to the Regent House under Special Ordinance A (ii) 5 (divestment from the arms industry): Notice from the Council (p. 112)

Topic of concern to the University on the future of the EJRA: Notice in response to Discussion remarks (p. 113)

Stipends of the holders of consultant clinical academic offices and payment for clinical responsibility from 1 April 2024 (p. 115)

Calendar

29 November, *Friday*. End of third quarter of Michaelmas Term.

30 November, *Saturday*. Congregation of the Regent House at 10 a.m.

6 December, *Friday*. Full Term ends.

10 December, *Tuesday*. Discussion by videoconference at 2 p.m. (see below).

Discussions (Tuesdays at 2 p.m.)

10 December

Congregations (at 10 a.m. unless otherwise stated)

30 November

Discussion on Tuesday, 10 December 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, 10 December 2024 at 2 p.m. The following item will be discussed:

1. Report of the Council on the office of Chief Financial Officer, dated 13 November 2024 (p. 117).

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 Registry, 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

7 November 2024

The Vice-Chancellor gives notice that she has accepted with gratitude a benefaction of £4,122,000 from the Board of Cambridge in America following a donation from Peter and Christina Dawson to endow a Dawson Professorship of Young People's Mental Health. The General Board is proposing the establishment of the Professorship in perpetuity and an endowment fund to support the Professorship (see p. 115 and Graces 2 and 3, p. 119).

Amending Statutes for Magdalene College

7 November 2024

The Vice-Chancellor begs leave to refer to her Notice of 11 October 2024 ([Reporter, 6755, 2024–25, p. 45](#)), concerning the text of a Statute to amend the Statutes of Magdalene College. She hereby gives notice that in the opinion of the Council the proposed Statute makes no alteration of any Statute which affects the University, and does not require the consent of the University; that the interests of the University are not prejudiced by it, and that the Council has resolved to take no action upon it, provided that the Council will wish to reconsider the proposed Statute if it has not been submitted to the Privy Council by 7 November 2025.

Statutes approved

7 November 2024

The Registry has received notice from the Clerk of the Privy Council that His Majesty the King, at a Council held on 6 November 2024, was pleased to approve amendments to Statutes A I, B I and D II, which were submitted in accordance with [Grace 2 of 14 February 2024](#).¹

These changes enable membership of the University to be removed for the non-payment of fees as set out in Ordinance, remove a provision stating that resignation of University membership entails cancellation of any degree, and confirm the circumstances in which loss of membership of the University will entail loss of membership of the Senate.

Footnote

¹ See [Reporter, 6729, 2023–24, p. 283](#).

Grace for submission to the Regent House under Special Ordinance A (ii) 5 (divestment from the arms industry): Notice from the Council

7 November 2024

The Council has received and considered a Grace initiated under [Special Ordinance A \(ii\) 5](#) by 165 members of the Regent House ([Reporter, 6751, 2023–24, p. 860](#)). That Grace seeks support for divestment from companies involved in the defence industry by the beginning of Michaelmas Term 2025. The Grace also asks the Council to publish a Report to consider the costs and effects of that divestment and to provide a timetable for achieving that outcome. There is some cross-over between the Grace and matters relating to the University's investments raised by students taking part in a protest encampment on King's Parade over the summer. Discussions between student representatives and senior officers concluded in August 2024 with a set of agreed actions.¹

The Council has decided to authorise submission of the Grace ([Grace 1, p. 119](#)). In reaching that decision, the Council notes that it has sole responsibility for decisions about investments, and therefore the Grace would not be binding on the Council if approved by the Regent House.² Nevertheless, the Council believes it is appropriate to examine these matters now, given that there is likely to be significant support in the Cambridge community for a considered appraisal of the University's investments and noting that many universities and other public sector bodies are examining similar issues.

The Council has agreed to set up a working group to consider the matters raised by the students and has expanded its remit to cover the additional points raised by members of the Regent House in the Grace. The terms of reference for the working group, set out in the [Annex](#) below, acknowledge the legal and regulatory framework within which the Council, as the University's trustee body, operates. Whilst the Council shares the desire of the signatories to undertake the work without delay, it notes the complex issues raised by the Grace. The Council will ask the group to aim to complete its work by the end of the academic year.

Footnotes

¹ See <https://www.cam.ac.uk/notices/news/upholding-our-values-responding-to-calls-from-our-university-community>.

² See Statute F I 1(a) and Special Ordinance F (i) 1(a), as revised by [Grace 2 of 8 March 2023](#) and approved by His Majesty in Council ([Reporter, 6732, 2023–24, p. 405](#)).

ANNEX

Working Group on Investments in and Research Funded by Companies belonging to the Defence Industry

Terms of Reference

Background

The Council is aware that many members of the University are deeply concerned about the tragic events unfolding in many parts of the world. In the past few months, a group of students expressed their concerns in the form of an encampment on King's Parade. In addition, at the end of July 2024, members of the Regent House submitted a Grace on divestment of the defence industry for consideration by the Council.¹

Following a constructive dialogue between members of the University's senior leadership team and delegates on behalf of the students protesting on King's Parade, a number of actions were agreed.² These included that relevant University bodies would review the approach to responsible investment and the guidelines that inform its research funded by companies belonging to the defence industry. It was further agreed that a working group would be established to make recommendations to the relevant University committees that oversee policies in relation to investments and research.

Scope

The Working Group will determine a suitable definition of companies to be classified as belonging to the defence industry.

The Working Group will consider two areas of enquiry, investments and research, in relation to the defence industry and make recommendations to the relevant University committees including the Council.

The Working Group will evaluate the two areas of enquiry in the wider context of the following:

- the University's role as a civic institution in the UK (including in relation to national security);
- the University's commitment to academic freedom and freedom of speech; and
- the University's obligations under charity law and other relevant legislation such as export control.

Investments

The Working Group will consider the following questions in relation to the University's investments in the Cambridge University Endowment Fund (CUEF):

- whether the Statement of Investment Responsibility³ (i.e. the University's policy as an investor in the CUEF) is in line with its institutional values in relation to the defence industry;
- whether it considers that the CUEF's classification of companies belonging to the defence industry is satisfactory for the University as an investor in the CUEF;
- whether it is satisfied with the level of disclosure to the University as investor in the CUEF of any direct or indirect exposure to the defence industry in the CUEF investment portfolios; and
- what (if any) any issues arise from potential divestment from the defence industry.

In assessing these questions, the Working Group will take into account:

- that the CUEF investment model is to invest via third-party fund managers;
- that distributions from the CUEF play an indispensable role in the University's finances;
- that the CUEF invests donations made to the University, its Colleges and associated charitable trusts. It is overseen by the Cambridge University Endowment Trustee Body (CUETB); and
- the Responsible Investment Principles of the CUETB.

Research relationships

The Working Group will consider:

- whether the University's guidelines/principles that inform its research funded by companies belonging to the defence industry are in line with its institutional values.

In assessing this question, the Working Group will take into account:

- that the University encourages collaborations and believes that openness is integral to its success as a world-leading research-intensive University.

Consultations

The Working Group is expected to base its assessments and recommendations on evidence. The Working Group has access to legal advice via Legal Services, who can also help facilitate external legal advice. The Working Group is encouraged to seek expert advice on any matter within its remit as it sees fit.

A number of higher education institutions and other public sector bodies are currently engaged in similar processes and discussions. The Working Group is encouraged to talk to comparable institutions about their deliberations and approaches.

Membership

The Working Group will comprise the following members:

- Chair
- Two student members of the Task Force (appointed by the Task Force)
- A student member of the Council appointed by the Council
- Two members appointed by the Council
- Two members appointed by the General Board
- One member appointed by University of Cambridge Investment Management (UCIM)

Spirit of Enquiry

The Council acknowledges that the issues to be explored by the Working Group are complex and that members of the Working Group will hold a variety of views. It expects that the members of the Working Group will treat each other with respect and conduct their business in a spirit of collaboration and transparency.

Footnotes

¹ *Reporter*, 6751, 2023–24, p. 860.

² See <https://www.cam.ac.uk/notices/news/upholding-our-values-responding-to-calls-from-our-university-community>.

³ *Reporter*, 6632, 2021–22, p. 45.

First Witness Statement of Jason Scott-Warren
Intervener
JSW3
DATE 2025

Claim No: KB-2025-000497

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KING'S BENCH DIVISION
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CAMBRIDGE**

Claimant

- and -

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OR OTHERWISE FOR A PURPOSE CONNECTED WITH THE PALESTINE-ISRAEL
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(C) THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN

Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT "JSW3"

Grace for submission to the Regent House under Special Ordinance A (ii) 5: Divestment from the arms industry

The Council has received the following Grace, which has been initiated under [Special Ordinance A \(ii\) 5](#) by 165 members of the Regent House:

The Regent House, as the governing body of the University, requests

- (a) that the University disclose in aggregate form the direct and indirect exposure of its investments within and outside the Endowment Fund in companies whose business is concerned with the arms industry, as defined below¹; and that the University commits to divest from the arms industry within the time period specified below; and
- (b) that the Council publish a Report to the University within six months of issuance of this Grace setting out how the University will divest from the arms industry. This Report should:
 - (i) provide costed details of how the University will divest from the arms industry; and
 - (ii) consider the effects of divestment on the University’s mission and function; and
 - (iii) set out a timetable for divestment which is to be completed no later than the beginning of Michaelmas Term 2025 – with the understanding that divestment from private equity funds may require further time.
- (c) that the Council put in place measures to ascertain that divestment has been completed, and to prevent future investments of this kind. Information on this category of investments should be included in the annual report of the Cambridge University Endowment Fund henceforth.

¹ Utilising the Church of England Ethical Investment Advisory Group’s recommendations, companies are classified as belonging to the arms industry if:

- (i) they are involved in the production or supply of indiscriminate weaponry (defined as nuclear weapons, anti-personnel mines, cluster munitions, chemical weapons or biological weapons), with no turnover threshold to be applied; or
- (ii) they are involved in the production, processing, supply or storage of weapons-grade nuclear fissile materials, with no turnover threshold to be applied; or
- (iii) they are involved in the provision of strategic parts or services for anti-personnel mines, cluster munitions, chemical weapons or biological weapons, with no turnover threshold to be applied; or
- (iv) they derive more than 10% of their turnover from strategic military sales including conventional military platforms, whole military systems, weaponry or strategic military parts or services; or
- (v) further to this definition, this Grace adds: they are technological surveillance companies that derive more than 10% of their revenue from their technologies being used by states for military purposes; or they are companies associated with violations of international humanitarian conventions, laws and regulations.

A list of the signatories is included in the Annex below.

The Council will consider the proposed Grace at its meeting on 21 October 2024.

ANNEX

R. H. ABBOTT	M. M. ARNOT	C. A. BASSETT
M. M. ABDEL RAHMAN	A. K. ARSAN	M. N. BEG
F. AHMED	A. ASHRAF	G. S. BETEGH
Z. AL AZMEH	W. J. ASTLE	E. C. BLAIR
R. A. ALEXANDER	A. J. ATTAHERI	B. A. BODENHORN
P. S. ANDERSON	V. BAENA	PIETE BROOKS
C. J. ANGELOPOULOS	R. A. BARR	N. BUITRON ARIAS
M. ARBUTHNOT	T. BASARAN	B. J. BURCHELL

C. M. BURLINSON	S. L. KENNEDY	B. M. B. POST
F. R. V. CHARMAILLE	P. M. KNOX	W. A. PULLAN
M. A. H. COLLIER	T. KREVER	M. QATO
H. J. CREMIN	M. E. DE L. LAMB	S. A. RADCLIFFE
A. L. CULLEN	C. M. H. LARDY	D. I. REDHOUSE
L. T. DEFRATES	M. R. LAVEN	J. D. RHODES
L. M. DELAP	S. LAZAR	J. RICHARDS
M. S. DESAI	C. L. LEMANSKI	S. A. ROBERTS
M. I. DHONT	C. Y. R. LEOW	J. S. ROCK
L. A. M. DILLON	E. R. LINES	P. M. ROSE
A. R. DONOVAN	K. A. LIVINGSTONE	M. A. RUEHL
F. H. Z. EL KEIY	SAITE LU	R. SABATES AYSA
H. M. ENGLUND	H. LUCAS	F. B. SAMUEL
K. C. ESTEFAN	E. J. T. MABER	A. SANCHEZ
N. W. EVANS	S. MAGHENZANI	C. G. SANDBROOK
I. S. FAROOQI	M. S. MAHMOUDI	Y. M. SAYED
H. FAWZI	C. MARTINI	C. M. G. SCOTT
S. FENNELL	E. E. MAWDSLEY	J. E. SCOTT-WARREN
A. M. FERGUSON	L. C. McMAHON	S. SEN
R. FIELD	A. S. MEGHJI	E. F. SENIOR
P. FILIPPUCCI	K. MENNIS	D. U. SHAH
A. FORRINGER-BEAL	M. A. MIHATSCH	L. M. SIMS
S. B. FRANKLIN	E. MIZROKHI	C. SINGH
M. F. FRANKLIN-BROWN	K. J. MOELLER	S. P. SIVASUNDARAM
N. A. GALLAGHER	S. K. MOHADDES ARDEBILI	D. A. SNEATH
H. E. GANDOLFI	S. Q. MOHAMED	C. P. SORACE
A. GARG	E. J. MONIER	A. M. STRATHERN
R. D. GARRETT	M. MONTAGNESE	J. S. TARNOWSKI
M. S. GOLDING	J. MORAN	T. TATE
P. GOPAL	M. G. MORENO FIGUEROA	G. TAUJANSKAS
P. M. GRAY	C. MORGENSTERN	J. E. THOMPSON
H. M. GROSSE RUSE-KHAN	R. MORIEUX	A. J. TOBIN
J. GUARNERI	L. MUKHIDA	T. TREGEAR
N. S. M. GUYATT	MARY MURPHY	A. J. TRINIDAD
A. HASSOUN	P. MURRAY	P. S. TZOKOVA
E. HAUGHTON-SHAW	B. F. MUSALLAM	A. S. URUS
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C. HUMPHREY	J. J. P. O'DWYER	R. M. WILSON
G. E. IDAHOSA	H. ORCHARD	T. T. WINDSOR
I. S. ILIE	E. G. ÖZYÜREK BAER	J. WOLF
M. INDIRA GANESH	J. E. M. PATTERSON	J. D. WOODCOCK
I. IVARSEN	E. PESARAN	K. YILDIRIM
E. KARAYIANNIDES	H. PFEIFER	K. A. ZANON
I. KATZ FEIGIS	H. E. PORTER	D. ZERKA

First Witness Statement of James Clark
Intervener
JC1-JC4
11 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BETWEEN:**

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

Claimant

- and -

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CAMBRIDGE, CB2 1TA**

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

Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

FIRST WITNESS STATEMENT OF JAMES CLARK

I, Dr James Clark, of Corpus Christi College, Trumpington Street Cambridge CB2 1RH will say as follows:

1. I am an Early Career Research Fellow at Corpus Christi College within the University of Cambridge. I am also the co-anticasualisation officer on the Executive Committee of the Cambridge Branch of the University and College Union (UCU), though I am writing this report in a personal capacity. Immediately before taking up my current

position, I spent eight years as an Undergraduate and then Postgraduate student (MPhil and PhD) at the University of Cambridge.

2. I have never been involved in Palestinian Solidarity Actions that have taken place within the sites named in the Injunction (i.e. Greenwich House, Senate House, Senate House Yard, and The Old Schools), though I have been involved in organising a protest which has walked through—but not stopped in—a University campus not named in the injunction, namely Sidgwick Site.
3. Over the past 18 months, I have attended numerous rallies in support of the Palestinian people in Cambridge, and have been involved in the organisation of one protest that was locally- and nationally- endorsed by UCU in solidarity with the Palestinian people since taking up my position on the Cambridge UCU Executive Committee in October 2024. I also have a longer-term pattern of attendance at protests taking place in Cambridge since October 2016, in support of a diversity of causes.
4. A large majority of these protests, both in the last 18 months and throughout my time in the City, have taken place at sites that are widely considered to form the traditional centre of protest for all issues within Cambridge, outside many of the areas named in the Injunction application (i.e. Senate House, Senate House Yard, and The Old Schools). This area forms a small loop from The Old Schools on Trinity Lane, along Senate House Passage, and along the continuous stretch of road from between Senate House and Great St. Mary's (Senate House Hill), to the front of King's College (King's Parade). I will specify that King's College is often the site of protests aimed at the entire University, not the College specifically, because of its position as a particularly public, geographically central, and symbolic College within the wider structure of the University. To illustrate this point, a simple Google Image search for the "University of Cambridge" overwhelmingly reveals images of colleges, and these are disproportionately of the King's façade and Chapel. This pattern means King's College is frequently included in University advertisement and media coverage, and therefore is an immediately recognisable setting for media coverage of protests.
5. As someone present in Cambridge for some time, I think it also important to emphasise the important recent history of student occupations in these areas and other University

buildings, beyond the Palestinian Solidarity Actions. I can recall in particular: a) an occupation of a Lecture Block on Sidgwick Site in 2022 (**Exhibit JC1**), b) an occupation of The Old Schools in 2020, and c) a separate occupation of The Old Schools in 2018 (**Exhibit JC2**). Each of these occupations were related to student expressions of solidarity with Industrial Action taken locally and nationally by UCU, are matters of public record, and won important concessions from the University, especially in admissions of the consequences of the Marketisation of the University sector (**Exhibit JC3**) and in putting pressure on the University of Cambridge to formally recognise UCU. These student actions were not followed by applications for injunctions, making the targeting of pro-Palestinian actions in the current Injunction application particularly stark.

6. The Palestinian solidarity event I have been involved in organising was a lunchtime rally and subsequent march on the 28 November 2024 to mark a national “Workplace Day of Action for Palestine”, that was called for by the Trades Union Congress and supported by UCU. This started with speeches between Great St. Mary’s Church and the Senate House Gates and subsequently outside The Old Schools, before proceeding to Sidgwick Site for a separate event. No issues arose during this event and, while protests of this nature with static elements and large gatherings of people always have a risk of slowing access to surrounding sites, especially where paths are already narrow, every effort was made to avoid this. Indeed, for this march, we had 12 stewards with high-visibility vests who ensured access to all roads and sites nearby to the protest, ensured progression of the crowd in a safe and orderly manner using almost exclusively pedestrianised areas, and always allowed for a route into these spaces. During marches down narrow pedestrianised areas (such as Senate House Passage), there was still an allowance for pedestrians moving in the opposite direction to progress along the side of the protest, and many did so. The only exception to the use of pedestrianised areas was the crossing of Queen’s Road on the way to Sidgwick Site, for which the stewards directed all participants across the pedestrian crossing at the traffic lights marking the intersection between Queen’s Road and West Road. Following this, the march entered Sidgwick Site at its pedestrian intersection with West Road, and walked along pedestrianised paths to reach a pre-booked student and staff assembly taking place on the Sidgwick Avenue side of Sidgwick Site, at Little Hall.

7. I was aware from my time as a student that there was guidance surrounding public gatherings of students, though this was poorly and infrequently communicated. Furthermore, I am not aware of any specific policies for staff, and have never had reason to believe these rules applied to use of public land outside of University property, or on public rights of way. Even as I write this report, a Google search for “Cambridge University rules on protest” only reveals resources aimed at students or resources only available on student websites that staff would have no expectation of relevance. Furthermore, as a member of the Executive Committee of a recognised Trade Union, it has always been my understanding that the organisation of mass meetings and gatherings was within the expected remit of Trade Union activities. Indeed, our recognition agreement (**Exhibit JC4**) states at clause 4.3:

“The University recognises UCU's responsibility to represent the interests of its members and to work for improved conditions of employment for their members.”

8. As a democratic body, we take the “interests of [our] members” to be detailed in motions passed within branch General Meetings, which can include both matters directly related to working conditions at the University, as well as broader political issues on which we campaign, such as expressing solidarity with the Palestinian people and binding the branch to take concrete action to do this (e.g. through a branch donation or through organisation of a protest). We have issued several such motions underlining our wish as a branch to support the Palestinian people through different means.
9. In terms of my practical interpretation of regulations on protests for those organised by Cambridge UCU, I have always worked from the assumption that the University should be informed in advance of static demonstrations taking place within University buildings or bounded sites (including those areas named in the application for an Injunction, namely Greenwich House, Senate House, Senate House Yard, and The Old Schools), where this was an unusual event. The most obvious example of this is notice given to the University of Industrial Action that involves the creation of picket lines at the entrances to University sites, as I have been involved with at Downing Site, Sidgwick Site, and West Cambridge through UCU-balloted national action. Beyond this, it has always felt impractical to inform the University of events on public land

outside University buildings or bounded sites, and to my knowledge the University has never tried to enforce restrictions on protest in public areas. The impracticality of such enforcement is highlighted by public access from all directions, and because such events can so frequently involve spontaneous individual or group responses to specific fast-emerging issues, as has repeatedly been the case with Palestine protests for which I have been in attendance. Furthermore, it has never crossed my mind to seek consent for group marches that make use of University campuses as public rights of way to reach pre-booked events and do not stop at these locations, as these routes are used by all members of the City. I will also emphasise that the University has not issued complaint about any event I have organised.

10. According to my understanding of the University rules, I have not asked the University for consent for protests organised in public areas, or which pass through public rights of way, such as across Sidgwick Site.
11. Similarly, I have not received notice of the Freedom of Speech code being applied for any event I have been involved with.
12. If the University were granted an Injunction for the areas requested against “persons unknown who, in connection with Cambridge for Palestine or otherwise for a purpose connected with the Palestine-Israel Conflict”, especially Senate House, Senate House Yard, and The Old Schools, it would selectively prevent my activity as an activist across multiple causes from organising and expressing freedom of assembly in solidarity with the Palestinian people. While I have never been involved in occupation activities, or the organisation of protests within Senate House, the Senate House Yard, The Old Schools, or Greenwich House, I have organised rallies both in solidarity with the Palestinian people and for other causes in non-bounded public areas outside of Senate House, Senate House Yard, and The Old Schools.
13. My most recent involvement in organising a protest for issues unrelated to Palestine was for the “Save the Vet School” Campaign on 4th March 2025, which took place on Senate House Hill between Great St. Mary’s and Senate House Yard in conjunction with Unite, Unison, and the Cambridge Students’ Union and had hundreds of attendees. Such mass gatherings of people are always intensively stewarded to maintain public right of

way and access to surrounding buildings and attendees are always respectful in allowing others through, but the volume of people may inadvertently “slow down” access to such areas. In this context, *any* protest related to Palestinian solidarity could put an organiser such as myself at risk of prosecution for contempt of court, while events focused on other causes do not carry the same risk and yet may have more attendees and create a higher likelihood of slowed access.

14. I am not Palestinian, but have long possessed beliefs in support of the Palestinian people and their right to not live under occupation and oppression, which is not an uncommon or restricted belief. As such, I believe this injunction would specifically restrict my activity in relation to this belief, in a way that directly contravenes the Equality Act. Beyond this, as a member of the Cambridge UCU Executive Committee, I have a duty to represent the democratic wishes of our members, as revealed through branch motions. As we have passed several branch motions of solidarity with the Palestinian people, including instructions for the branch to host protests, meaning the proposed injunction directly interferes with our ability to function as a recognised Trade Union within the University.

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: 

Dated: 11 March 2025

First Witness Statement of James Clark
Intervener
JC1
11 March 2025

Claim No: KB-2025-000497

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Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT "JC1"

Source: <https://www.ucu.cam.ac.uk/solidarity-with-the-student-occupation-of-sidgwick-site/>
Accessed: 11.03.2025



University of Cambridge Branch

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Solidarity with the student occupation of Sidgwick site

📅 February 25, 2022 📁 Uncategorized



Recent Posts

• UCU General Secretary to University of Cambridge VC: drop your injunction suppressing free speech (February 26, 2025)

• Unions Launch Campaign to Save the Vet School (February 21, 2025)

1165

As members of staff at the University of Cambridge and its Colleges, we send a message of solidarity to students at the University of Cambridge who have occupied a lecture block at the Sidgwick Site this week in support of the UCU strike and the demands of Unite and Unison.

Their student occupation commenced against the backdrop of the University voting in favour of devastating cuts to the USS pension, and during the fifth major UCU strike in the last four years. The students have stated their solidarity with staff members striking for a fair pension and against pay inequality, job insecurity and exploitative workloads. As well as the conditions and cuts faced by UCU members, members of Unite and Unison have seen attacks on their jobs and conditions through outsourcing, deterioration in their pay and rising workloads.

Rather than blaming staff for the disruption to their education, students have made clear that they have a common interest in standing with us to defend higher education from the relentless pressures of marketisation wreaking havoc across the sector. Staff working conditions are, by necessity, student learning conditions. We stand in solidarity with the occupation, just as students have stood together with us.

Cambridge students are not alone: The NUS has called for a national Strike for Education on March 2nd. Students across the country will stage a walkout.

We urge the University to respect students' right to peaceful protest. We urge members of staff across the Collegiate University to sign [this statement](#) and to [join the activities planned for March 2nd](#).

Signed:

- CUCU motion: Defend the right to protest
(February 19, 2025)
-

- Cambridge University Week Against Racism – 17-21 March 2025
(February 5, 2025)
-

- Statement on the Cambridge for Palestine occupation and call for day of action 28 November
(November 25, 2024)
-

- Cambridge needs a payrise! Resources and updates on our campaign for Cambridge weighting
(November 21, 2024)
-

- J4CS Campaign Update – November 2024
(November 11, 2024)
-

- Cambridge Researchers Report highlights pay pressures, job insecurity and “a culture of overwork”
(May 22, 2024)
-

1166

University of Cambridge UCU, **Executive Committee**

Add your name to the statement [here](#)

Read more from the occupation via Cambridge Defend Education [here](#)

Plus individual signatories include:

Anne	Alexander	Research Associate	CRASSH / CDH
Adam	Attaheri	Research Associate	Psychology
Rober	Britten	Teaching Associate, Director of Studies	MMLL (German
Natali	Buitron	Assistant Professor	Anthropology
Dylan	Carver	Special Supervisor, Newnham College	English
Hero	Chalmer	College Teaching Officer	English
Joe	Cotton	Communications Officer	Department o Sociology
Nicol	Crisafi	Research and Teaching Fellow in Italian at Pembroke	MMLL Italian

- Joint UCU branch statement on the Oxford and Cambridge Palestine solidarity encampments (*May 6, 2024*)

Search



Dan	Daviso	PhD candidate and undergraduate supervisor	Department of Sociology
Lucy	Delap	Professor	History
Manali	Desai	UTO and DoS	Sociology
Eleanor	Drage	Research associate	Gender studie and LCFI
David	Ewing	PhD student	French
Iosifina	Foskolo	Research Associate	PDN
Christoph	Gagne	Teaching Officer	MMLL
Mariana	Galante	Research Fellow	
Priya	Gopal	Prof	English
Luke	Hawksbee	Visiting lecturer, supervisor	Sociology
Ronald	Haynes	University Senior Compute Officer	University Information Services
Tom	Hobson	Research Associate	CSER
David	Hoey	Graduate student	Plant Sciences/SLCU
Iza	Hussin	Associate Professor/Fellow	POLIS
Ruth	Lawlor	Junior Research Fellow, Queens' College	History

Sian	Lazar	Professor	Social Anthropology
Hugo	Leal	Research Associate	CRASSH
Kerry Anne	Mackereth	Postdoctora Researcher	POLIS
Amy	Mason	Research associate	
Pete	McMurray	Associate Professor	Music Faculty
Ella	McPherso	Associate Professor	Department of Sociology
Pedro	Mendes Loureiro	Lecturer	CLAS, POLIS, Fitzwilliam College
Jo	Miller	Affiliated Lecturer	POLIS
Surer	Mohamed	Research Fellow	Centre of African Studies
Monica	Moreno Figueroa	Associate Professor in Sociology	Sociology
Chana	Morgenster	Associate Professor	English
Clemen	Mouhot	Professor	Faculty of Mathematics
Tobias	Müller	Affiliated Lecturer	POLIS

SB2 PDF PAGE 141

Anjum	Nahar	Postgraduate President (Cambridge SU)	
Francis	Near	Editor	Darwin Correspondence Project
Rune	Nyrup	Senior Researc Associate	Leverhulme Centre for the Future of Intelligence
Holly	Porter	University	POLIS
Joeva	Rock	Assistant Professor	POLIS
Jason	Scott- Warren	Professor	Faculty of English
Rona	Soni	Research Associate	DAMTP
Ted	Tregear	Research Fello	English



Cambridge Defend Education

about 3 years ago

We have occupied Sidgwick Lecture Block in solidarity with the UCU strikes!

We demand:

- The University of Cambridge commits to negotiating a comprehensive recognition agreement with UCU that includes all categories of staff.
- The University makes a public statement calling for local and national U demands to be met, including both the Four Fights and USS Pensions, alongside those of UNITE and UNISON.... [See more](#)



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6

18

« Tuesday Update: Crunch
Time

Cambridge Student-Staff
Solidarity Assembly – 2 March
»

About

The official homepage for the University of
Cambridge
branch of the national University and
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Get in touch

admin@ucu.cam.ac.uk
Tel: (01223)(7)64944

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First Witness Statement of James Clark
Intervener
JC2
11 March 2025

Claim No: KB-2025-000497

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Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT "JC2"

source: <https://www.varsity.co.uk/news/15145>

accessed: 11.03.2025

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Staff strikes

Student activists occupy Old Schools in support of strikes

Around thirty campaigners from Cambridge Defend Education are occupying the University administrative offices in support of the UCU pensions strike

- [Live: Students occupy central University building](#)



Students pinned up flyers in the windows of the Syndicate Room in the Old Schools building
LOUIS ASHWORTH

by [Oliver Guest & Todd Gillespie](#)

This article is 7 years old
Monday March 12 2018, 6:17pm

Updated: 8:42pm

79 shares

[This is a developing story. Read the live blog here.](#)

Thirty student activists from Cambridge Defend Education (CDE) have occupied Old Schools, which house the central University offices and office of the vice-chancellor.

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to defend their pensions. The group encouraged staff and students to stand outside Old Schools to demand “open access to the occupation and safety for occupiers”, and around 45 attended swiftly, but have now dispersed.

CDE also claimed that security are “trying to remove students”, but the University has said this is “completely untrue”.

Only hours before the occupation, vice-chancellor Stephen Toope **announced** that the University would provide higher contributions to the pensions scheme which the strike is intended to maintain, though only while a long-term solution is found.

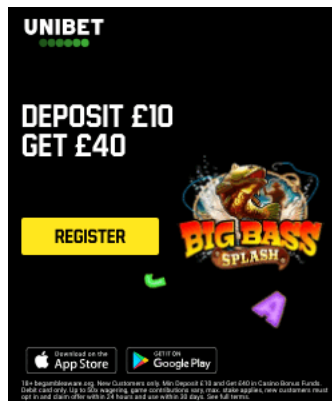
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Universities UK (UUK) also tonight announced that an agreement has been reached between UUK and the Universities and College Union (UCU). Both parties agreed to a transitional benefit arrangement which will maintain “a meaningful level” of defined benefits for scheme members and will last for three years. Both employers and members would have to pay higher contributions to make this possible, and the salary threshold would be reduced. UCU’s higher education committee and branch representatives will meet tomorrow to consider the proposal.

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During the occupation of Old Schools, which is ongoing, Cambridge Defend Education listed their demands in a Facebook post: “[We] Demand that the Vice Chancellor void the university’s response to the USS consultation in September 2017

scheme in the long term, with Cambridge as a member.

“In line with Toope’s promises to being open and transparent, to hold an open meeting with students and staff to discuss the handling of the pension scheme, and further issues of institutional accountability and democracy. This should include transparency around the university’s investments, especially relating to staff pensions.

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“Free access to the occupiers, and no disciplinary consequences for students or staff for participation in or support for the occupation.”

Paul Mylrea, the University’s director of communications, stands in the courtyard of Old Schools
LOUIS ASHWORTH

A fire alarm was pulled in the neighbouring Gonville & Caius library at around 17:15. It is unclear who was responsible for the alarm sounding.

Abbas Khan, a student who was in the library at the time, told *Varsity* that “there was a bit of confusion and then one of the staff members asked everyone to evacuate, so we did. Once we got outside the library, we were told to disperse and weren’t allowed back in.”

The library reportedly reopened at around 18:00.



support pension scheme

At 18:30, senior pro-vice-chancellor, Duncan Maskell, entered Old Schools. At 18:52, Julie Taylor, a senior solicitor for the University, was also let inside the building.

The gate to Senate House, next to Old Schools, has been locked

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From the back entrance to Old Schools, students could be seen inside the building, putting up flyers.

The occupation follows a **failed attempt** by students to storm the building on Thursday as part of a rally. During the rally, students and gown-clad academics gathered on Senate House lawn, chanting questions to vice-chancellor Stephen Toope.

During that rally, protesters chanted questions to Toope, including: "Why is this university hiding behind the pension regulator?"

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!

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Staff strikes

Toope attacks 'fundamental error of university marketisation'

Cambridge's vice-chancellor used a letter to *The Times* today to denounce "reducing students to mere consumers"

- [Live: Students occupy central University building](#)



Toope wrote that he shared CUSU president Daisy Eyre's concerns for the future of higher education

COMPOSITE: LOUIS ASHWORTH

by [Louis Ashworth](#)

This article is 7 years old

Friday March 16 2018, 10:13am

193 shares

Stephen Toope, Cambridge's vice-chancellor, sided with CUSU today in arguing current strikes and demonstrations – including

1180

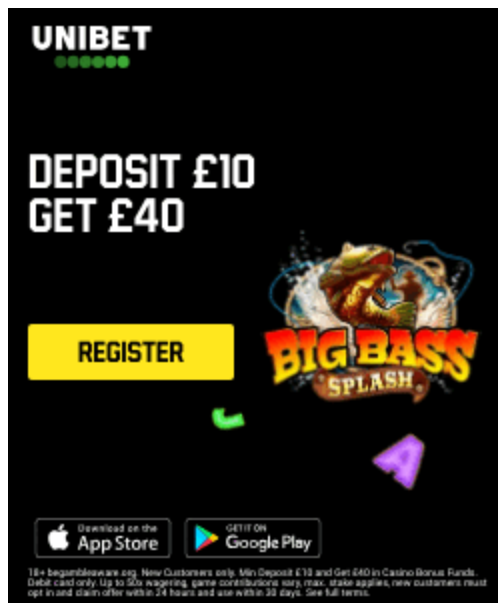
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In Toope’s intervention, made in [a letter to *The Times*](#), he wrote that he shared the concerns of Daisy Eyre, CUSU’s president, that current actions are “about the future of higher education, continued marketisation and the move towards students as consumers”.

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Referencing a series of recent statements and concessions he has made in the ongoing staff pensions dispute, Toope wrote: “We

would be a mistake to assume that the anger directed at university leadership is all about pensions.”

“Reducing students to mere consumers makes sense only if the value of universities is simply economic. That would be a fundamental error,” he added.

@NicholasGuya · [Follow](#)

It seems we have friends in high places: Stephen Toope, Cambridge VC, tears into marketisation of higher ed in a letter to the Times. [#ucustrike](#)



8:06 AM · Mar 16, 20



11



Rep



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Toope's latest comments come on the fifth day of the student occupation at Old Schools, the building adjacent to Senate House where much of the University of Cambridge's central administration is housed, and follow weeks of strikes by academics that have led to cancelled teaching and picket line across several lecture sites.

Vice-chancellor Toope to attend open meeting on strikes

In recent days, the vice-chancellor has made a series of statements and concessions: offering the University's financial support to bolster staff pensions, and saying that Cambridge will not expect academics who have gone on strike to reschedule teaching time without compensation, a reversal of earlier policy. He has also agreed to participate in an open meeting later today, at which he will address questions from the public.

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His letter today criticised the “value for money” focus of the current review into higher education, which has been ongoing for several years and was marked recently by the scandal-hit launch of the Office for Students – recently criticised by Commissioner for Public Appointments for showing partisan bias in its selection of board members.

as part of the government's ongoing review into nationwide higher education provision, saying: "The focus should be on what values our society expects to see reflected in our universities, not only value for money."

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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!

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First Witness Statement of James Clark
Intervener
JC4
11 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
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

EXHIBIT "JC4"

RECOGNITION AND PROCEDURE AGREEMENT

Parties:

This Recognition and Procedure Agreement is between (1) The Chancellor, Masters, and Scholars of the University of Cambridge ("the University") and (2) the University and College Union ("UCU").

The terms of this Agreement will commence from the date both parties have signed this Agreement and will supersede all previous recognition agreements in force between the parties at that time.

Definitions of key terms in this Agreement are contained within Appendix A.

1. THE STRUCTURE OF THE UNIVERSITY

- 1.1 Matters affecting the appointment of academic, academic-related and research staff, and their general conditions of pay and service, are determined by the Council and/or the General Board on the recommendation of the HR Committee and the University and Staff Joint Board as laid down in Statutes and Ordinances.
- 1.2 The University delegates to the Heads of Institutions the detailed day-to-day responsibility for the work of the staff in those situations.
- 1.3 The University recognises that the Head of each Institution has a duty to pay due attention to the working conditions of their staff with a view to staff being able to make the most effective contribution to the work of their institution. It is accepted that the Head of each Institution has an obligation to implement agreements reached between the University as the employer and UCU.
- 1.4 The University and UCU recognise that informal and internal channels of communication within each institution generally represent the first and immediate method for the resolution of problems and difficulties, and UCU will encourage its members to bring these problems and difficulties to the attention of the Head of Institution or their representative before other channels are employed.

2. RECOGNITION

- 2.1 The University as the employer recognises the right of UCU to represent its members and to negotiate on behalf of staff within the following bargaining units: academic, academic-related and research staff and the terms of this Agreement shall apply to those bargaining units only. For the avoidance of doubt, this Agreement does not apply to persons engaged in the service of Cambridge University Press and Assessment.

- 2.2 UCU for its part accepts its rights of representation for bargaining units as set out in section 2.1 above.
- 2.3 The University undertakes to refrain from actions and UCU undertakes to refrain from recruitment policies that are likely to create inter-union disputes.
- 2.4 UCU accepts that inter-union disputes shall not be the subject of coercive action at University level but shall be determined in accordance with procedures agreed between the unions concerned.
- 2.5 All parties recognise that revision of the distribution of accredited representatives and representation rights may be necessary and will be mutually discussed and agreed.

3. MEMBERSHIP

- 3.1 The University recognises that fully representative trade unions make a contribution to good staff relations and will therefore welcome membership of trade unions by staff, although trade union membership is not a condition of employment.
- 3.2 As a result, the University will include information about UCU, and how to join, in starter packs for all new staff in the relevant categories, as well as inviting representatives from UCU to talk at central staff induction events.
- 3.3 The University will inform UCU of the names and locations of all newly appointed academic, academic-related and research staff, for the purposes of recruitment by UCU, subject to the explicit consent of the staff member, unless the University decides otherwise, taking into account its implementation of data protection laws in force at any time.

4. GENERAL PRINCIPLES

- 4.1 The University and UCU have a common objective in ensuring the proper and successful functioning of the University.
- 4.2 UCU recognises the University's responsibility in administering and planning its work in a manner which maintains the academic standards of the University.
- 4.3 The University recognises UCU's responsibility to represent the interests of its members and to work for improved conditions of employment for their members.
- 4.4 The University agrees that, before implementing any alterations, other than minor alterations, to the conditions of employment of academic, academic-related and research staff in general (as opposed to those of an individual employee) it will consult with the appropriate trade unions and resolve any consequent issues through negotiating procedures. Minor alterations would

include typographical errors, straightforward legal updates to provisions, changes in names, departments or persons, or other similar wording changes which do not substantively alter the conditions of employment.

5. APPOINTMENT AND FUNCTION OF ACCREDITED REPRESENTATIVES

5.1 Accredited Representatives

- 5.1.1 The parties agree that accredited representatives be appointed to carry out the duties prescribed by UCU and to represent the members in accordance with the terms of this agreement.
- 5.1.2 UCU will inform the University in writing of the names of their accredited representatives within 14 days of their election or appointment and of any subsequent changes, including the ending of their appointment for any reason. UCU shall indicate in each case whether these are to be accredited workplace representatives, accredited University and Staff Joint Board representatives, accredited Trade Union Officers (to include caseworkers and members of UCU's Cambridge branch executive) or accredited Health and Safety representatives. For the avoidance of doubt, accredited representatives can be appointed to more than one of these roles.
- 5.1.3 On appointment each accredited representative shall receive credentials supplied by UCU in the form shown in Appendix B of this agreement, together with a copy of this and other relevant agreements as amended from time to time, and shall supply a copy to the University's HR Division within 28 days of appointment.
- 5.1.4 An accredited representative employed by the University shall be entitled to reasonable paid time off during normal working hours to carry out their trade union duties, subject them obtaining prior permission from their line manager. Such permission shall not be unreasonably withheld.
- 5.1.5 The University shall agree arrangements for reasonable paid time off during working hours for accredited representatives employed by the University to attend training courses approved by UCU or by the Trades Union Congress on industrial relations matters. This shall also apply to UCU members where this is with a view to them becoming accredited, provided that UCU has approved their attendance at the course for such purposes, and the member's line manager agrees, such agreement not to be unreasonably withheld.
- 5.1.6 The University shall provide to University line managers of trade union representatives guidance in connection with the arrangements for facility time under this Agreement.

- 5.1.7 Accredited representatives shall have the reasonable use of the following systems for communication within the University on matters covered by this agreement: internal postal, email, telephone and Teams or other electronic communications platform generally in use at the University.
 - 5.1.8 UCU shall provide the University with information necessary in order that the University can comply with its annual facility time reporting obligations under the Trade Union (Facility Time Publication Requirements) Regulations 2017.
 - 5.1.9 The University shall reimburse University departments in respect of facility time spent by accredited representatives of UCU to a limit of 3 FTE per annum in total across the University.
- 5.2 Accredited Workplace Representatives
- 5.2.1 Accredited workplace representatives shall be appointed by UCU to represent its members in specific areas of the University. A workplace representative may operate only within the areas specified on the credentials.
 - 5.2.2 The name and location of the accredited workplace representative shall be published by the Head of Institution on the appropriate notice boards and in electronic noticeboards and webpages.
- 5.3 Accredited University and Staff Joint Board Representatives
- 5.3.1 UCU shall appoint a maximum of 4 UCU representatives to the University and Staff Joint Board to carry out the duties in accordance with the regulations for that Board. (See Appendix C to this agreement.)
- 5.4 Accredited Trade Union Officers
- 5.4.1 These are certain designated accredited representatives of UCU who are permitted to operate throughout the University. These shall include members of UCU's Cambridge Branch Executive and caseworkers.
 - 5.4.2 Additional facilities for accredited trade union officers may be provided as specified in individual agreements between the University and UCU.
- 5.5 Accredited Health and Safety Representatives
- 5.5.1 An agreed number of accredited Health and Safety Representatives shall have a seat on the University's Consultative Committee for Safety. See clause 14.1 of this Agreement for details.

6. COLLECTION OF TRADE UNION SUBSCRIPTIONS

- 6.1 A check-off system shall operate whereby the University undertakes to deduct trade union dues from salary/wages of trade union members if the members so desire, and to pay them to the trade union. No charge shall be made for this facility.
- 6.2 UCU members shall authorise deductions in writing. UCU representatives shall be responsible for obtaining the written authorisation from the member concerned.

7. TRADE UNION MEETINGS

- 7.1 Meetings between representatives of the University and UCU shall normally be held during working hours. Accredited representatives employed by the University shall be allowed reasonable time off to attend such meetings. Accredited representatives employed by the University shall inform their line manager before attending such meetings.
- 7.2 Facilities for UCU members to meet within the University shall be made available.
- 7.3 Certain accredited representatives employed by the University may need time off with pay to attend trade union meetings outside the University. Permission to attend such meetings shall not be unreasonably withheld.
- 7.4 Joint notice boards for trade union matters shall be provided by the University. Their number and location shall be agreed by the HR Business Manager in consultation with UCU and the Head of Institution concerned.

8. THE UNIVERSITY AND STAFF JOINT BOARD

- 8.1 All parties agree that the University and Staff Joint Board is set up with the object of providing a means of consultation and negotiation between the University and the trade unions in respect of the terms and conditions of employment of the staff in the bargaining units for whom the trade unions have been recognised.
- 8.2 The regulations for the University and Staff Joint Board and its Standing and Special Joint Negotiating Committees as approved by the Regent House are given in the Ordinances of the University (Appendix C to this agreement.)

- 8.3 The Chief Financial Officer of the University may deputise for the Director of the Finance Division at meetings of the University and Staff Joint Board and its Standing and Special Joint Negotiating Committees.

9. NEGOTIATING PROCEDURE

- 9.1 The University and UCU agree that it is in their mutual interest to observe a negotiating procedure by which all issues arising between them can be considered and resolved.
- 9.2 The intention of all parties is that issues will be resolved at the earliest stage possible and as speedily as possible.
- 9.3 The right of a member of staff, whether a member of UCU or not, to request a personal interview with their Head of Institution shall be in no way limited by this procedure.
- 9.4 The matters which fall to be negotiated between the parties to this agreement are set out in paragraphs 6 a), 6 b) and 7 a) of the Regulations for the University and Staff Joint Board (set out at Appendix C to this agreement). The procedure to apply is as set out in Appendix C.
- 9.5 The Director of Human Resources may at any stage in the procedure be consulted for advice and help in resolution of all the issues.
- 9.6 Provided all parties agree, the procedure may be abbreviated and any stage may be omitted in the interest of a speedy resolution.

10. THE DISPUTE RESOLUTION PROCEDURE BETWEEN UCU AND THE UNIVERSITY

- 10.1 This procedure for the resolution of disputes between UCU and University applies to those matters identified at 6 a), 6 b) and 7 a) of the Regulations for the University and Staff Joint Board (set out at Appendix C to this agreement).

Informal Resolution

- 10.2 Matters under 10.1 shall be submitted to the Director of HR (or their nominated deputy) in writing.

Formal Resolution

- 10.3. If the matter is not resolved within ten working days of it being referred to the Director of HR (or their nominated deputy), either the

Director of HR or UCU may refer it to the University and Staff Joint Board or otherwise to the relevant Standing Joint Negotiating Committee (where matters relate to a specific staff group only) for their consideration.

- 10.4 The formal resolution procedure to be adopted by the University and Staff Joint Board or Standing Joint Negotiating Committee (as appropriate), shall be in accordance with the Regulations for the University and Staff Joint Board in force at the time (Appendix C to this agreement). Any reference to classes (a), (b) and (c) of the Board in this document are references to those classes as defined in Regulation 1 of Appendix C.
- 10.5 The University and Staff Joint Board or Standing Joint Negotiating Committee (as appropriate) will meet within ten working days of the matter being reported to the University and Staff Joint Board or as soon as reasonably practicable thereafter.
- 10.6 Subject to the right to adjourn or cancel any meeting of a Standing Joint Negotiating Committee in pursuance of regulation 10 of the Regulations for the University and Staff Joint Board (set out at Appendix C to this agreement), the decision of the Board or Standing Joint Negotiating Committee (as appropriate) shall be notified to all the parties concerned within five days of their meeting, or as soon as reasonably practicable thereafter, and, depending on the issue under dispute, may be subject to ratification by the Council.
- 10.7 Where there is failure to agree within a Standing Joint Negotiating Committee under this procedure, the substance of the failure shall be reported to the Board.
- 10.8 Conciliation, Mediation and Arbitration
- 10.8.1 Where there is failure to agree following consideration by the Board, the use of mediation, conciliation or arbitration may be explored. Depending on the issue under dispute, any outcome of conciliation or mediation may be subject to ratification by the Council. For the avoidance of doubt, the use of mediation, conciliation or arbitration will occur only with the unanimous agreement of the members of the Board in classes (a) and (b) and members of the Board in class (c) representing each bargaining unit affected.
- 10.8.2 In circumstances where mediation, conciliation or arbitration have been considered or used, and there is still failure to reach agreement, the Board shall submit the matter for consideration by the Council (at the next scheduled Council meeting where possible) on the basis of a submission setting out all areas of dispute from members of the Board in class (a) and (b) and

members of the Board in class (c) representing each bargaining unit affected.

- 10.8.3 The University recognises that UCU may seek the approval of its members in respect of any agreement reached under 10.8 of this procedure. Any failure by UCU to gain approval by its members shall not prevent the Council from ratifying and implementing any decision. In such circumstances this procedure for the resolution of disputes will be considered by the parties to be at an end.

10.9 Action to Force the Issue

- 10.9.1 No coercive action arising from this procedure for the resolution of disputes shall be taken either by UCU or the University and their agents to force the issue until the procedure for the resolution of disputes is at an end and final failure to agree has been formally notified to the other parties in writing.

11. NATIONAL BARGAINING

11.1 For the avoidance of doubt, matters decided in the course of national negotiations will not be the subject of local discussion except in so far as questions of local application, over which the University has discretion, may arise. The University and UCU support national bargaining and will not seek to use discussions at either the University and Staff Joint Board or any Joint Negotiating Committee (whether Special or Standing) to undermine it.

12 DISCIPLINARY ACTION AGAINST TRADE UNION REPRESENTATIVES.

- 12.1 No disciplinary procedure will be invoked against a UCU accredited representative without first notifying the Regional Official of UCU in writing (which, for the avoidance of doubt, can include by email).

13. MEMBERSHIP OF UNIVERSITY COMMITTEES

- 13.1 The University will provide UCU with a seat on each of the following committees:

13.1.1 The University's Consultative Committee for Safety.

13.1.2 The University Equality Diversity and Inclusion Committee.

- 13.2 UCU shall be entitled to nominate an employee who is eligible for membership of the Universities Superannuation Scheme ("USS") and an employee who is eligible for USS (with less than 10 years' service in USS) for membership of the University's Pensions Working Group ("PWG"), when

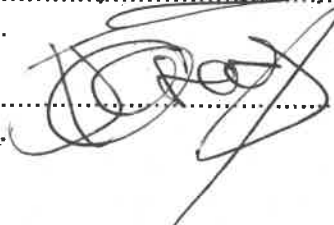
those seats become vacant, in accordance with the Terms of Reference for the PWG. In the event that UCU's nomination is not accepted, UCU shall be entitled to provide alternative nominations before any other nominations are sought.

14. TERMINATION OF THE AGREEMENT

14.1 The Agreement shall continue in force until terminated by any party giving six months' notice to the others of that effect.

Signed on behalf of the University

Signed on behalf of UCU

A. Fricker 23/5/2023


Date 10/3/2023

A. Fricker 23/5/2023

APPENDIX A

DEFINITIONS

1. Head of Institution

Within the context of this agreement, the term "Head of Institution" shall mean the head or acting head or a representative designated by either of them, or any Faculty, Department, or Institution in which the employment of assistant staff has been authorised by the central body concerned.

2. The University

Within the context of this agreement, the term "the University" means The Chancellor, Masters, and Scholars of the University of Cambridge. For the avoidance of doubt, this agreement does not apply to persons engaged in the service of Cambridge University Press and Assessment.

3. The Council

Within the context of this agreement, the term "the Council" means the Council of the University.

4. Trade Union

Within the context of this agreement, the term "Trade Union" shall mean the University and College Union (UCU).

5. Accredited Representative

Within the context of this agreement, the term "Accredited Representative" shall include:-

Accredited Workplace Representative
Accredited University and Staff Joint Board Representative
Accredited Trade Union Officer
Accredited Health and Safety Representative

6. Accredited Workplace Representative

Within the context of this agreement, "Accredited Workplace Representatives" represent UCU members in specified areas of the workplace.

7. Accredited University and Staff Joint Board Representative

Within the context of this agreement, "Accredited University and Assistants' Joint Board Representatives are appointed to carry out duties in accordance with the regulations for that Board.

8. Accredited Trade Union Officer

Within the context of this agreement, the term "Accredited Trade Union Officer" refers to certain designated accredited representatives who are permitted to operate throughout the University. These shall include caseworkers and the members of UCU's Cambridge Branch executive.

9. Accredited Health and Safety Representative

Within the context of this agreement, the term "Accredited Health and Safety Representative" shall mean a health and safety representative appointed in accordance with the Safety Representatives and Safety Committees Regulations 1977, or as substituted or amended from time to time.

10. Cambridge University Press and Assessment

Within the context of this agreement, the term "Cambridge University Press and Assessment" means the Press and Assessment Department of the University.

11. Caseworker

Within the context of this agreement, the term "caseworker" shall mean an accredited representative whose duties are handling casework on behalf of one or more individual UCU members.

12. UCU Representative

Within the context of this agreement, the term "UCU Representative" shall include Accredited Representatives and paid full time officials of UCU.

APPENDIX B

REPRESENTATIVES' CREDENTIALS

UCU confirms that has
been appointed/elected to act as an accredited:

- Workplace representative to operate within the
.....(insert details of area).
- University and Staff Joint Board representative
- Trade Union Officer
- Health and Safety representative

(delete as appropriate)

1. They shall be an accredited representative for
.....months from the date of appointment.
2. When acting in their trade union capacity, they shall act in accordance with the relevant Recognition Agreement in force from time to time between UCU and the University, together with any associated procedures or agreement and in accordance with the constitution of the University and Staff Joint Board (if relevant).

Signed by the representative

Signed on behalf of the union

Date

APPENDIX C

REGULATIONS FOR THE UNIVERSITY AND STAFF JOINT BOARD

The University and Assistants' Joint Board was reconstituted as the University and Staff Joint Board in 2023 and the following are the regulations in force from the date both parties have signed this Agreement:

University and Staff Joint Board

1. The University and Staff Joint Board shall consist of members in the following classes:

- (a) The Vice-Chancellor (or a duly appointed deputy) as Chair;
- (b) (i) eight members of the Senate, four of whom at least shall be either Heads of institutions or other persons concerned with the administration of staff therein, appointed as follows:
 - (1) four persons, of whom one at least shall be a member of the Council, appointed by the Council;
 - (2) four persons appointed by the General Board;
- (ii) the Registrar, the Director of the Finance Division, the Academic Secretary, and the Director of the Human Resources Division of the University Offices (or their deputies) who shall be members *ex officio*;
- (iii) members of the Human Resources Division of the University Offices as nominated by the Director of the Human Resources Division.
- (c) such number of representatives for each bargaining unit as agreed with those trade unions to which the Council has granted negotiating rights. This number may include respective regional representatives.

2. The Council shall from time to time announce in a Notice published in the *Reporter* the membership of the Board and in the case of the trade unions, which bargaining units they represent.

3. Members of the Board in class (b)(i) shall be appointed in the Michaelmas Term to serve for four years from 1 January following their appointment; provided that, if at any time among the members in sub-class (1) there has ceased for any reason to be at least one member who is also a member of the Council, the Council shall have power to replace, if necessary, one of the members in that sub-class so as to satisfy that requirement for the remainder of the tenure of the person so replaced. Members of the Board in class (c) shall serve for such length of time as may be decided by the organisation that they represent. Members of the Board in class (b)(iii) shall serve for such period as may be decided by the Director of the Human Resources Division.

4. The Council shall appoint a University officer to be Joint Secretary of the Board. The members of the Board in class (c) shall appoint one of their own number to be Joint Secretary of the Board. The Joint Secretaries of the Board shall also serve as Joint Secretaries to any Joint Negotiating Committee.

5. The method of appointment of members in class (c) shall be decided by the trade unions that they represent, provided these are accredited representatives in accordance with the relevant recognition agreement. The trade unions concerned shall inform both Joint Secretaries of the names of the representatives whom they have appointed before those representatives take their place on the Board.

6. The duties of the Board shall be:

- (a) to keep under review such terms and conditions of employment as are set out in Regulation 7(a) of those staff of the University in the bargaining units for whom the trade unions have been recognised;
- (b) to consider any matter under sub-paragraph (a) that is either referred to them by the Council or by the General Board, or which they are requested to consider by the members of the Board in class (b) or class (c);

(c) to make decisions, subject to the approval of the Council and/or the Regent House as appropriate, in connection with matters under sub-paragraphs (a) and (b) for submission to the Council, such decisions to be made in accordance with Regulation 7(b);

(d) to form:

- (i) Special Joint Negotiating Committees, where appropriate, to consider any specific matters relating to the duties of the Board as set out under sub-paragraphs (a) and (b), which may affect one or more bargaining units; and
- (ii) Standing Joint Negotiating Committees for (1) assistant staff, (2) academic-related staff, and (3) academic and research staff combined, to consider any matters relating to the duties of the Board as set out under sub-paragraphs (a) and (b), that solely affect those bargaining units.

7. (a) The terms and conditions of employment of the staff of the University, as referred to in Regulation 6, shall mean collective matters relating to: salaries and wages; allowances; hours of work, holidays, and compensation for overtime; payments during absence through sickness; training; recruitment; welfare; recognition of long service; and the Cambridge University Assistants Contributory Pension scheme (other than matters relating to the operation or management of that scheme). For the avoidance of doubt, matters decided in the course of national negotiations will not be the subject of local discussion except in so far as questions of local application, over which the University has discretion, may arise. The University and the trade unions support national bargaining and will not seek to use discussions at meetings of either the Board or any Joint Negotiating Committee to undermine it.

(b) Business shall be transacted by the Board, where there is present a majority of members of the Board in classes (a) and (b) combined and a majority of the members of the Board in respect of each trade union in class (c) representing each bargaining unit affected, unless those groups agree in advance that they are content to proceed in the absence of fewer members. Decisions of the Board under Regulation 6(c) shall not be valid unless agreed by a majority of those present in classes (a) and (b) combined and a majority of those present from each trade union in class (c) representing each bargaining unit affected. If the Board fails to reach agreement, any of those members may request that the dispute resolution procedure is initiated, in accordance with the terms of the relevant recognition agreement. Where the dispute resolution procedure has failed and no agreement has been reached, the Board shall submit the matter for consideration by the Council on the basis of a submission setting out all the areas of dispute from members of the Board in class (a) and (b) and members of the Board in class (c) representing each bargaining unit affected.

(c) Where disputes are raised under a valid recognition agreement and informal resolution has failed, the Board or its Joint Negotiating Committees may be convened to deal with such disputes in accordance with the procedure set out in the relevant recognition agreement.

Special and Standing Joint Negotiating Committees [Side-note for margins]

8. (a) Special and Standing Joint Negotiating Committees shall consist of:

- (i) (1) the Director of the Human Resources Division of the University Offices or a nominated deputy;
- (2) members appointed from among the members of the Board in classes (a) and (b) by the members of the Board in classes (a) and (b);
- (ii) up to four members of the Board in class (c) from each trade union representing the bargaining unit(s) affected, appointed by those trade unions;

provided that the number of members appointed from classes (a) and (b) of the Board shall not exceed the number of members appointed from class (c).

(b) Each Joint Negotiating Committee, whether Special or Standing, shall appoint one of its members to act as its Chair. The Joint Negotiating Committee may also agree to appoint the Chair by rotation.

9. Business may be transacted by a Joint Negotiating Committee, Special or Standing, where there is present a minimum of one member appointed from classes (a) and (b) and one member from each of the trade unions representing the bargaining units affected appointed from class (c), unless all members of that Joint Negotiating Committee agree in advance that they are content to proceed in the absence of fewer members.

10. The Chair shall adjourn or cancel any meeting of a Joint Negotiating Committee, whether Special or Standing, if its members in both classes (b) and (c) of the Board so request.

11. A Joint Negotiating Committee, whether Special or Standing, shall allow trade union representatives who are not members of that Joint Negotiating Committee to attend and take part (but not vote) in its meetings if this

is requested by members of that Committee in class (c) of the Board, where those trade union representatives have relevant interests in or can provide expertise on the matters under discussion.

12. The Director of the Human Resources Division may grant persons the right to attend and take part (but not vote) in a Joint Negotiating Committee meeting, whether Special or Standing, where they have relevant interests in or can provide expertise on the matters under discussion.

13. The rules of procedure of each Joint Negotiating Committee, whether Special or Standing, shall be subject to agreements on procedure that may be negotiated from time to time between the members of that Joint Negotiating Committee.

14. (a) Decisions (or amendments of decisions) of a Joint Negotiating Committee, whether Special or Standing, shall not be valid unless agreed by a majority of those present from classes (a) and (b) and a majority of those present from each trade union in class (c) representing the bargaining unit affected. The Chair shall not have a casting vote. Decisions of a Joint Negotiating Committee, whether Special or Standing, are subject to the approval of the Council and/or the Regent House as appropriate.

(b) Those decisions shall be provided to the Board for submission to the Council. No amendment proposed by the Board shall be made unless it is agreed by the Joint Negotiating Committee in accordance with 14(a). For the avoidance of doubt, if the Board does not agree with a decision of a Joint Negotiating Committee, the Board may ask the Joint Negotiating Committee to reconsider it.

(c) If a Joint Negotiating Committee, whether Special or Standing, fails to reach agreement, the substance of the failure shall be reported to the Board for discussion. If there is still failure to reach agreement after discussion by the Board, any member of that Joint Negotiating Committee may request that the dispute resolution procedure is initiated, in accordance with the terms of the relevant recognition agreement. Where the dispute resolution procedure has failed and no agreement has been reached, the Board shall submit the matter for consideration by the Council, on the basis of a submission setting out all areas of dispute from members of the Board in classes (a) and (b) and members of the Board in class (c) representing each bargaining unit affected.

¹ The submissions would be made through the HR Committee to the Council.

First Witness Statement of Michael Abberton
Intervener
MA1-MA12
12 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
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
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CB2 1TA**

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

Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

FIRST WITNESS STATEMENT OF MICHAEL ABBERTON

I, Michael Abberton, of Cambridge University Press & Assessment, The Triangle Building,
Shaftesbury Road, Cambridge, CB2 8EA will say as follows:

1203

1. I am president of the Cambridge University branch of the University and College Union (UCU) and a member of staff at Cambridge University Press and Assessment. I am making this statement on behalf of the elected executive committee of Cambridge UCU. I have checked information regarding union policies and activities with members of the committee and UCU's national and regional offices.
2. In 2023, UCU signed a formal recognition agreement with the University. This means that we represent all academic and academic-related staff for the purpose of collective bargaining (whether they are members or not) and approximately 1800 individual members. Prior to this, we nevertheless regularly met University management for meetings to discuss local issues related to our members' conditions of employment. In my capacity as Branch President I continue to meet representatives of University management on a regular basis, and following the work done by my predecessor, have worked hard to maintain what I would describe as a good working relationship.
3. Our branch has mobilised members to take part in picketing and protest rallies on numerous occasions participating in lawful industrial action called by the national union. This has been in support of disputes related to pensions, pay, working conditions and equality. During my term in office, we have always used the area in front of Gt St Mary's for rallies, and though whilst not impeding access to the Old Schools in any respect, we have always had our main picket on the pavement opposite. It has been our custom and practice to invite speakers to rallies from student groups, other trade unions, town and county councils, our MP, and local and national campaigns in order to inform and educate our members on matters relevant to the union's policies such as climate justice, anti-racism, opposition to the arms trade and the Palestine-Israel conflict. This has included lawful pickets outside Senate House during previous graduation ceremonies, for example in June 2016 (**Exhibit MA1**).
4. UCU has regularly discussed and adopted national policies related to the Palestine-Israel conflict at its annual congresses. Our branch was one of several which proposed a motion adopted by UCU national congress in 2021 on the topic which expressed solidarity with the Palestinian people, noted findings by Human Rights Watch and Amnesty International of "crimes against humanity of apartheid and persecution" by the Israeli authorities and

called on the UK government to institute trade sanctions and an arms embargo on Israel (**Exhibit MA2**).

5. Since October 2023 Cambridge UCU has frequently discussed the Palestine-Israel conflict and its implications for our members and the wider university community and has been active in organising campaigning activities directed at the University administration. On 8 February 2024 our branch passed a resolution at a general meeting which noted the ICJ ruling that Israel must take emergency measures to prevent genocidal acts in Gaza and that “Cambridge University holds research collaborations and receives funding from multiple companies directly involved in arming Israel and thus at risk of contributing to the genocide of Palestinians, including BAE Systems, Boeing, Rolls Royce and others. BAE Systems manufactures parts of the F-35 stealth fighter jet used extensively by the Israeli military in waves of airstrikes against the civilian population of Gaza. Rolls-Royce makes the “LiftSystem” fan propulsion system for the F-35 in Filton, Bristol. Boeing produces precision guided munitions used by the Israeli Air Force in Gaza.” (**Exhibit MA3**). The motion further noted “repeated initiatives by students and staff calling on the University of Cambridge opposing institutional partnerships and research collaborations with, investment in, or the receipt of funding from companies or institutions complicit in military aggression by Israel against the Palestinian people or associated with the maintenance of occupation and apartheid. This has included open letters in 2014, 2018, 2021 and 2023 signed by hundreds of staff and students.” The motion called on the University to “work towards terminating contracts and partnerships with companies providing arms to Israel and profiting from the killing, oppression and displacement of the Palestinian people. This process should include seeking alternative sources of funding and supporting research related to violations of international law by Israel, and the defense of the rights of the Palestinian people” and resolved “to work towards launching a campaign calling on the University to enact a boycott of, and divestment from, BAE Systems, Boeing and Rolls Royce in coordination with students at the University and with other UCU branches engaged in similar action against the same companies. The campaign will involve research to map the extent of University complicity and identify additional campaign targets as appropriate, develop a robust evidence base and organise actions such as open letters, protests and public events.”

6. In pursuance of this local policy and in line with UCU's national policies noted above, our branch has:
 - a. participated in "workplace days of action" calling for an immediate ceasefire and urging the University to end its relationships with companies supplying arms to Israel organised by Palestine Solidarity Campaign, Stop the War Coalition. On 8 March 2024, we organised a rally in the street outside Great St Mary's Church opposite Senate House Lawn in solidarity with Palestinian women. The rally was co-organised with the Cambridgeshire branch of the National Education Union (NEU) and was attended by around 100 participants including members of UCU, NEU, students and members of staff at the University.
 - b. organised rallies in the same location which marched down Trinity Lane to the door of Old Schools on the national workplace days of action on 28 November 2024 (**Exhibit MA4**) and 13 February 2025. These events were jointly organised with Cambridge for Palestine, Cambridge Palestine Solidarity Campaign, Cambridge Stop the War and the Cambridge University Palestine Solidarity Society. On 28 November 2024 over 100 staff, students and members of the wider community participated, while the rally and march on 13 February 2025 was attended by around 40 people.
 - c. never, to the best of my knowledge, sought permission from the University before organising rallies and protests in these locations. During my time in office, having personally taken part in numerous protests, rallies and pickets, I have no recollection of receiving any complaints at these sites, whether verbally or in writing, from security or any other university staff. When required, we have liaised with the Cambridgeshire Police to ensure that any conditions are met and the safety of participants can be assured.
 - d. requested information from the University about the scope of its investments and relationships with companies supplying arms to Israel and undertaking other activities which risk complicity in acts of genocide and other crimes against humanity and met the pro-Vice Chancellor for Institutional Affairs to urge the University to take action to end any such ties.

7. On 6 May 2024 students initiated a Palestine solidarity encampment on land adjacent to King’s College. Our branch executive committee drafted a joint statement with Oxford UCU branch executive which stated: “we fully back our students’ demands for disclosure and accountability in relation to the Universities’ financial investments.” The statement added “We therefore call on the two Universities to take immediate action in response to the demands of staff and students to end investments in, and collaborative research and procurement contracts with, companies and academic institutions funding and supplying weapons to the Israeli military or enabling Israel’s violations of international law through the crimes of apartheid and genocide” and ended “We also urgently call on university management at Oxford and Cambridge to meet with members of the Solidarity Encampment to discuss their demands.” **(Exhibit MA5)** We conveyed these requests to management at the meeting of the University Joint Staff Board (a regular joint meeting between the University and the recognised trade unions) on 15 May 2024.
8. We therefore welcomed the negotiations between the University administration and representatives of the encampment and statement published on the University’s website on 17 July 2024, in which the Vice Chancellor and pro Vice-Chancellors for Education and Institutional Affairs made a commitment to “ensure that the review processes relating to responsible investments and research relationships outlined in this document take place rapidly during Michaelmas Term 2024”. **(Exhibit MA6)**
9. Our executive committee was extremely concerned by developments **(Exhibit MA7)** in Michaelmas Term 2024 as the University took decisions **(Exhibit MA8)** which alienated students involved in Cambridge for Palestine and were perceived by many members of the University community as reneging on the agreement which led to the disbandment of the encampment in July 2024. Our executive committee issued a statement on 25 November 2024 in response to the occupation of Greenwich House which stated “We urge the University to honour the agreement made with the Palestine encampment and reinstate the 12 member-task force set up to review investments and partnerships with Israel.” **(Exhibit MA4)** The statement noted the increasing urgency of ending arms supplies to Israel in the light of the escalation of war in the region, the ICC’s decision to issue arrest warrants for Yoav Gallant and Binyamin Netanyahu for “the war crime of starvation as a method of warfare and the crimes against humanity of murder, persecution, and other inhumane acts”

(**Exhibit MA9**), and the continued use by Israeli forces of weapons, aircraft and equipment made by companies with which the University of Cambridge has longstanding partnerships, including BAE Systems. (**Exhibit MA10**)

10. In February 2025 we learnt that the University intended to seek an order from the High Court which it claimed was necessary to prevent disruption to degree ceremonies and to “enable staff to carry out their daily work”. The University’s draft order would severely restrict activities in the public streets outside the land specified at Old Schools and especially Senate House. The draft order mentions that penal clauses will be enforced if access to the land is “slowed down”. Walking through a gathering of our members in the street protesting in solidarity with the Palestinian people could be considered as having this effect. The medieval door to the Old Schools already has restricted access. In the past we have been met at this door by security personnel to receive petitions and the like, which unavoidably then further limits access to anyone wanting to pass at that time. We are concerned that the order would be exposing our members to punitive measures for something so entirely innocent, legal and commonplace - something that happens regularly for example at the Prime Minister’s official residence.
11. We were deeply concerned by this announcement, as we were aware that the University of London had recently obtained an interim injunction placing severe restrictions on pro-Palestine protests on its lands near SOAS and Birkbeck and that UCU and Unison branches at UCL, SOAS and Birbeck were organising a campaign protesting this decision. At an emergency general meeting on 11 February 2025 our branch passed a motion declaring that “the use of injunctions by Universities to restrict protests and occupations is a serious threat to freedom of assembly and expression” and resolving to “coordinate a campaign with students and other campus unions against the University’s attempts to suppress protest rights.” (**Exhibit MA11**)
12. When I read the contents of the University's submission to the court, my concerns about the impact of a court order of this type on our members and on my own activities as a trade unionist and Palestine solidarity campaigner increased. I have regularly taken part in protests outside Old Schools and Senate House. We have always organised our own stewarding for protests and allowed vehicles or pedestrians to pass along the street or into the buildings in question. In my years as branch president and member of the Cambridge

UCU executive I am not aware of any occasion when our branch has asked the University for permission to organise a protest, march or gathering in this location. To the best of my knowledge all of the pro-Palestine protests which have taken place in this location during my time at the University have been peaceful. I am worried about the effect that an order creating special conditions which must be met for activities related to Palestine will have on Palestinian members of staff and students, and on those who, like myself, are committed to campaigning against Israel's violations of international law. It would create a situation where the same kind of activities in exactly the same locations would be treated differently simply on the basis of the pro-Palestinian beliefs and identities of the people participating. As a trade unionist I find this kind of discrimination abhorrent.

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: *Michael Abberton*

Dated: 12 March 2025

First Witness Statement of Michael Abberton
Intervener
MA1
12 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
BETWEEN:**

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

Claimant

- and -

**PERSONS UNKNOWN WHO, IN CONNECTION WITH CAMBRIDGE FOR
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CB2 1TA**

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

Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT “MA1”

Photos of Cambridge UCU Pickets

All accessible at <https://www.facebook.com/cambridgeucu>

(accessed 11/3/2025)

26 May 2016, outside Senate House Yard gates



16 June 2016, Graduation ceremony protest, outside Senate House Yard gates



22 February 2018, outside Old Schools



8 March 2018, Outside Great St Mary's and Senate House Yard gates



22 March 2019, outside Great St Mary's



26 November 2019, outside Senate House Yard gates



11 March 2020, outside Senate House Yard gates



First Witness Statement of Michael Abberton
Intervener
MA2
12 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
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Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT “MA2”



University of Cambridge Branch

Search



2021 Late Congress Motion on Solidarity with Palestine

Congress notes:

- renewed Israeli barrage against Gaza;
- ethnic cleansing of Palestinians from East Jerusalem;
- Human Rights Watch finding “crimes against humanity o apartheid and persecution” by Israel;
- Racist attacks on Palestinians by mobs protected by police.

Congress believes this...

compounds:

- illegal settlement in the West Bank;
- systematic discrimination against Palestinians holding Israeli citizenship;

Recent Posts

- UCU General Secretary to University of Cambridge VC: drop your injunction suppressing free speech *(February 26, 2025)*

- Unions Launch Campaign to Save the Vet School *(February 21, 2025)*

- CUCU motion: Defend the right to protest

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- Nation State Law making Israel a state for Jews, rendering Palestinians and non-Jewish immigrants second-class;

and arises from:

- Israel's settler-colonial and supremacist nature for which Britain bears special responsibility.

Congress resolves via GS to:

- urge members to review any relationships with Israeli institutions, and consider their moral and political implications;
- call on UK Government and devolved administrations to impose trade sanctions and arms embargos on Israel as an Apartheid state;
- circulate sanctions petition to members;
- urge branch-organised PSC/BRICUP meetings, defending the right to criticise Zionism against antisemitism smears.

Passed at 18 May 2021 Branch Meeting

(February 19, 2025)

- Cambridge University Week Against Racism – 17-21 March 2025

(February 5, 2025)

- Statement on the Cambridge for Palestine occupation and call for day of action 28 November

(November 25, 2024)

- Cambridge needs a payrise! Resources and updates on our campaign for Cambridge weighting

(November 21, 2024)

- J4CS Campaign Update – November 2024 *(November 11, 2024)*

- Cambridge Researchers Report highlights pay pressures, job insecurity and “a culture of overwork”

(May 22, 2024)

- Joint UCU branch statement on the Oxford and Cambridge

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About

The official homepage for the University of
Cambridge
branch of the national University and
College Union.

Get in touch

admin@ucu.cam.ac.uk
Tel: (01223)(7)64944

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First Witness Statement of Michael Abberton
Intervener
MA3
12 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
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Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT “MA3”



University of Cambridge Branch



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Campaigning for boycott and divestment in solidarity with Palestine: an update

📅 May 6, 2024 📁 International

On 8 February our branch overwhelmingly passed the motion below at a General Meeting. Since then we have worked with a broad group of staff and students to develop a campaign which supports the call for the [academic boycott of Israeli higher education institutions](#) and encourages all members of the University community to support its aims. This is aligned with UCU's national policy which is to support members who exercise their rights in joining the boycott. We hosted author Maya Wind at an event co-organised with the REAL Centre and the Centre of Lebanese Studies at the Faculty of Education on 30 April at which she shared [her research on the role played by Israeli](#)

Recent Posts

- UCU General Secretary to University of Cambridge VC: drop your injunction suppressing free speech *(February 26, 2025)*
- Unions Launch Campaign to Save the Vet School *(February 21, 2025)*

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universities in entrenching apartheid and occupation, as well as enabling war crimes and genocide against Palestinians by the Israeli military.

Our BDS working group has also researched the role played by companies such as BAE systems, Google and Palantir, all of which have deep links with the University of Cambridge through research collaborations, and which play well-documented roles in Israel's violations of international law. We have worked with the SU to put in a Freedom of Information request to the University about the extent of its investments in complicit companies via the Cambridge University Endowment Fund – the University has **refused to be fully transparent** on this matter, claiming this would prejudice its “commercial interests”.

We will be sharing more information about how CUCU members can get involved in further campaigning actions in the coming days.

Motion on terminating the University's collaborations with companies implicated in the bombing of Gaza

passed at a **general meeting on 8 February 2024**

Cambridge UCU notes

1. The ICJ ruling that Israel must take emergency measures to prevent genocidal acts in Gaza.
2. The wholesale destruction of the higher education and health systems in Gaza, the killing of more than 25,000 Palestinians, and the risk that famine and disease will lead to the deaths of many more.
3. UCU national policy in support of members' right to refuse complicity in Israeli apartheid and occupation through support of boycott, divestment and sanctions campaigns.
4. Cambridge University holds research collaborations and receives funding from multiple companies directly involved in

- CUCU motion: Defend the right to protest
(February 19, 2025)

- Cambridge University Week Against Racism – 17-21 March 2025
(February 5, 2025)

- Statement on the Cambridge for Palestine occupation and call for day of action 28 November
(November 25, 2024)

- Cambridge needs a payrise! Resources and updates on our campaign for Cambridge weighting
(November 21, 2024)

- J4CS Campaign Update – November 2024
(November 11, 2024)

- Cambridge Researchers Report highlights pay pressures, job insecurity and “a culture of overwork”
(May 22, 2024)

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arming Israel and thus at risk of contributing to the genocide of Palestinians, including BAE Systems, Boeing, Rolls Royce and others. BAE Systems manufactures parts of the F-35 stealth fighter jet used extensively by the Israeli military in waves of airstrikes against the civilian population of Gaza. Rolls-Royce makes the "LiftSystem" fan propulsion system for the F-35 in Filton, Bristol. Boeing produces precision guided munitions used by the Israeli Air Force in Gaza.

5. Repeated initiatives by students and staff calling on the University of Cambridge opposing institutional partnerships and research collaborations with, investment in, or the receipt of funding from companies or institutions complicit in military aggression by Israel against the Palestinian people or associated with the maintenance of occupation and apartheid. This has included open letters in 2014, 2018, 2021 and 2023 signed by hundreds of staff and students.

Cambridge UCU believes


1. The University should work towards terminating contracts and partnerships with companies providing arms to Israel and profiting from the killing, oppression and displacement of the Palestinian people. This process should include seeking alternative sources of funding and supporting research related to violations of international law by Israel, and the defence of the rights of the Palestinian people.
2. The University should revise processes of ethical review for research funding to include assessment of risks of complicity in violations of international humanitarian law.

Cambridge UCU resolves

1. To work towards launching a campaign calling on the University to enact a boycott of, and divestment from, BAE Systems, Boeing and Rolls Royce in coordination with students at the University and with other UCU branches

- Joint UCU branch statement on the Oxford and Cambridge Palestine solidarity encampments (*May 6, 2024*)

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engaged in similar action against the same companies. The campaign will involve research to map the extent of University complicity and identify additional campaign targets as appropriate, develop a robust evidence base and organise actions such as open letters, protests and public events.

2. To provide support for members exercising their right to refuse to carry out work which would risk complicity in genocide or other violations of international humanitarian law.
3. To call on UCU nationally to provide resources and support for branches engaged in developing BDS campaigns.

« Joint statement J4CS and the Colleges, University and Office for Intercollegiate Services 11/4

Joint UCU branch statement on the Oxford and Cambridge Palestine solidarity encampments »

About

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Get in touch

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First Witness Statement of Michael Abberton
Intervener
MA4
12 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
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EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT “MA4”



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- Unions Launch Campaign to Save the Vet School (*February 21, 2025*)

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Workplace day of action for Palestine

**Stop arming Israel
Cambridge University
is complicit
Divest NOW**

Thursday 28 November

Rally at Great St Mary's 12pm
Staff-student Assembly,
Little Hall, Sidgwick Site, 1-2pm

Cambridge University and its constituent colleges invest in arms companies which are profiting from genocide and war crimes in Gaza and Lebanon. Trinity College is refusing to sell its shares in Israeli drone manufacturer Elbit. The University has longstanding research collaborations and partnerships with some of the same companies including Boeing, BAE systems and Rolls Royce.

Thousands of staff and students have called for an end to this complicity, through open letters, protests, encampments and a grace to Regent House in favour of divestment from all arms companies. Join us on the national day of action for Palestine called by the TUC to rally, march and discuss the way forward in an open assembly where staff and students will put the case for divestment.



Statement on the Cambridge for Palestine occupation and call for day of action 28 November

📅 November 25, 2024 📁 Uncategorized

Statement from the CUCU Executive, 25 November in response to the occupation of university buildings on 22 November by students from Cambridge for Palestine.

- CUCU motion: Defend the right to protest
(February 19, 2025)

- Cambridge University Week Against Racism – 17-21 March 2025
(February 5, 2025)

- Statement on the Cambridge for Palestine occupation and call for day of action 28 November
(November 25, 2024)

- Cambridge needs a payrise! Resources and updates on our campaign for Cambridge weighting
(November 21, 2024)

- J4CS Campaign Update – November 2024
(November 11, 2024)

- Cambridge Researchers Report highlights pay pressures, job insecurity and “a culture of overwork”
(May 22, 2024)

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Cambridge UCU Executive committee stands in continued solidarity with the demands of Cambridge for Palestine who, along with thousands of staff, students and alumni, have called on the University to end investments and partnerships with companies and institutions complicit in genocide, war crimes and crimes against humanity by the Israeli state in Palestine and Lebanon. These demands have assumed even greater urgency in the last few months as a result of the launch of a full-scale war against Lebanon, the escalation of ethnic cleansing in Northern Gaza, and the **ICC's decision to issue arrest warrants** for Benjamin Netanyahu and Yoav Gallant for "the war crime of starvation as a method of warfare; and the crimes against humanity of murder, persecution, and other inhumane acts". Weapons, aircraft and equipment made by companies with which the University of Cambridge has longstanding partnerships, such as BAE systems **are being used by Israeli forces in Gaza and Lebanon**.

We urge the University to honour the agreement made with the Palestine encampment and reinstate the 12 member task-force set up to review investments and partnerships with Israel.

We call on the University not to take punitive or disciplinary measures against students for engaging in non-violent protest, including occupying university buildings. Such forms of action have long been recognised as playing an essential role in struggles for justice and equality including against the Vietnam War and apartheid in South Africa. We applaud our students for their determination to speak up against their institution's failure to end its complicity with companies whose products are being used to perpetrate horrendous crimes.

We urge our members to join the rally and assembly for divestment on 28 November, the national day of action for

- Joint UCU branch statement on the Oxford and Cambridge Palestine solidarity encampments (*May 6, 2024*)

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Palestine called by the TUC and supported by UCU.

Workplace day of action for Palestine

Stop arming Israel – Cambridge University is complicit – Divest NOW

Thursday 28 November

- Rally Great St Mary's 12pm
- Staff-student Assembly, Little Hall, Sidgwick Site 1-2pm

Cambridge University and its constituent colleges invest in arms companies which are profiting from genocide and war crimes in Gaza and Lebanon. Trinity College is refusing to sell its shares in Israeli drone manufacturer Elbit. The University also has longstanding research collaborations and partnerships with some of the same companies including Boeing, BAE systems and Rolls Royce. Thousands of staff and students have called for an end to this complicity, through open letters, protests, encampments and a grace to Regent House in favour of divestment from *all* arms companies. Join us on the national day of action for Palestine for walkouts, a rally and march, followed by an open assembly where staff and students will make the case for divestment and plan the next steps in this campaign.

Workplace day of action for Palestine

**Stop arming Israel
Cambridge University is complicit
Divest NOW**

Thursday 28 November

Rally at Great St Mary's 12pm
Staff-student Assembly,
Little Hall, Sidgwick Site, 1-2pm



Cambridge University and its constituent colleges invest in arms companies which are profiting from genocide and war crimes in Gaza and Lebanon. Trinity College is refusing to sell its shares in Israeli drone manufacturer Elbit. The University has longstanding research collaborations and partnerships with some of the same companies including Boeing, BAE systems and Rolls Royce.

Thousands of staff and students have called for an end to this complicity, through open letters, protests, encampments and a grace to Regent House in favour of divestment from all arms companies. Join us on the national day of action for Palestine called by the TUC to rally, march and discuss the way forward in an open assembly where staff and students will put the case for divestment.



« Cambridge needs a payrise
Resources and updates on our
campaign for Cambridge
weighting

Cambridge University Week
Against Racism - 17-21 March
2025 »

About

The official homepage for the University of Cambridge branch of the national University and College Union.

Get in touch

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First Witness Statement of Michael Abberton
Intervener
MA5
12 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
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

EXHIBIT “MA5”



University of Cambridge Branch

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Joint UCU branch statement on the Oxford and Cambridge Palestine solidarity encampments

📅 May 6, 2024 📁 Uncategorized

On Monday 6 May 2024, students from both the Universities of Oxford and Cambridge set up encampments in protest at their institutions' complicity in the Israeli assault on Gaza and Israel's longstanding violations of international law through the crimes of occupation and apartheid. Since October 2023, Israel's bombing of Gaza has resulted in a reported death toll of over 34,000 Palestinians. Israeli action has destroyed all of Gaza's universities, and the majority of its schools. It has also killed over 5000 students, 260 teachers, and more than 94 University professors.

Recent Posts

• UCU General Secretary to University of Cambridge VC: drop your injunction suppressing free speech (February 26, 2025)

• Unions Launch Campaign to Save the Vet School (February 21, 2025)

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Within this context, our students join their counterparts from KCL, UCL, Manchester, University of Bristol, Newcastle University, Warwick University, other universities in Britain as well as universities in the USA, France, Canada, India and other countries worldwide to demand that our institutions acknowledge and condemn this scholasticide, call for an immediate ceasefire, divest from Israel's war and apartheid regime, end institutional partnerships and research collaborations with companies complicit in violations of international law including occupation, apartheid, war crimes and genocide and commit resources to rebuilding educational institutions in Gaza.

As union branches representing thousands of academic, academic-related, administrative and professional services staff, and postgraduate researchers at the Universities of Oxford and Cambridge, we affirm that students' demands align with the collective policy of our union both locally and nationally. We have passed motions on this issue at branch meetings in **Oxford** and **Cambridge**, and many of our members have individually signed open letters demanding action from our institutions, such as the calls made by University of Cambridge staff and students in **2018**, **2021** and **2023**, and the Rhodes Scholars for Palestine petition at Oxford in **2023**.

We fully concur with the statement issued by national **UCU in solidarity with student encampments**, which condemned the actions of university administrators in the USA who invited militarised police onto campuses and enabled their brutal attacks on students and staff. We urge the Universities of Oxford and Cambridge to ensure that they protect students' freedom of assembly and expression. We reject all forms of racism and discrimination including antisemitism, Islamophobia and anti-Palestinian racism and base our calls for boycott,

- CUCU motion: Defend the right to protest
(February 19, 2025)

- Cambridge University Week Against Racism – 17-21 March 2025
(February 5, 2025)

- Statement on the Cambridge for Palestine occupation and call for day of action 28 November
(November 25, 2024)

- Cambridge needs a payrise! Resources and updates on our campaign for Cambridge weighting
(November 21, 2024)

- J4CS Campaign Update – November 2024
(November 11, 2024)

- Cambridge Researchers Report highlights pay pressures, job insecurity and “a culture of overwork”
(May 22, 2024)

divestment and sanctions against Israel firmly on these principles.

Both Universities have long been engaged in research collaborations with arms companies that have supplied Israel, including **BAE Systems** and **Raytheon** and with technology companies such as Google and Palantir that provide the infrastructure and services supporting the genocidal targeting of Palestinians in Gaza. Both universities have created massive opaque investment funds which have refused to disclose the scale of their holdings in companies complicit in Israel's violations of international law by hiding behind claims of "commercial interests". This is incompatible with their own missions: Oxford's status as a "**University of Sanctuary**" which commits to "being a place of welcome for people who have been forcibly displaced around the world" and Cambridge's mission "**to contribute to society through the pursuit of education, learning and research at the highest international levels of excellence.**" **This incompatibility must be addressed and rectified:** this is why we fully back our students' demands for disclosure and accountability in relation to the Universities' financial investments.

We therefore call on the two Universities to take immediate action in response to the demands of staff and students to end investments in, and collaborative research and procurement contracts with, companies and academic institutions funding and supplying weapons to the Israeli military or enabling Israel's violations of international law through the crimes of apartheid and genocide.

We stand in solidarity with colleagues and students around the world who have taken part in Palestine solidarity encampments especially those who have faced extreme violence from the

- Joint UCU branch statement on the Oxford and Cambridge Palestine solidarity encampments (May 6, 2024)

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police. We condemn university administrators acting unilaterally to change campus rules (sometimes overnight) so as to outlaw certain forms of student protest. Faculty, staff, and students must not be excluded from university governance and decision-making.

We also urgently call on university management at Oxford and Cambridge to meet with members of the Solidarity Encampment to discuss their demands.

Cambridge UCU executive committee

Oxford UCU executive committee

6 May 2024

Please see [UCU's national page of resources and materials for background](#) on the union's position on these issues including the statement in [solidarity with student encampments](#), and also UCU's initial statement [from October 2023](#)

« [Campaigning for boycott and divestment in solidarity with Palestine: an update](#) [Cambridge Researchers Report highlights pay pressures, job insecurity and "a culture of overwork"](#) »

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Intervener
MA6
12 March 2025

Claim No: KB-2025-000497

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Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT “MA6”

Upholding our values: responding to calls from our university community

Last updated: 01 Aug 2024

We have been in dialogue with our students for several weeks about the humanitarian tragedy unfolding in Gaza. We have respected their right to protest within the law and in line with the community guidelines they set out. At all times we have been aware of the impact of the encampment on our wider community and provided support and reassurance during what has been a difficult time.

The group has asked several questions about University policy, and we have agreed to explore a number of these through our governance processes. This is set out in the following statement.

The future actions in this statement are contingent on the encampment closing down.

This has been a challenging year for many in our community. A group of our students has expressed their deeply felt anguish at the humanitarian tragedy unfolding in Gaza, in the form of their encampment on King's Parade, their recent resolution at the Cambridge SU Student Members' Meeting, and the views that have formed the basis for the constructive dialogue between members of the University's senior leadership team and delegates on behalf of the protesting students.

The University firmly supports its students' right to academic freedom, freedom of speech and the right to protest, all within the law. This has guided our approach to the protests, and our willingness to engage empathetically with all members of our community. We are also aware that there are differing views on the conflict, and that upholding freedom of speech must, under no circumstance, allow for the unlawful discrimination, bullying, intimidation or harassment of any individual or group in our community. We abhor anti-Palestinian racism, Islamophobia, antisemitism and any other forms of racism. We call on members of our community to continue to treat each other with empathy and civility.

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priority is, and will remain, the safety and wellbeing of our staff and students. We therefore continue to welcome the peaceful conduct of the protests so far, including protesters' adherence to their stated community guidelines.

The Office for Students has written to us and other universities to remind us of our legal duty to protect freedom of speech and the right to protest within the law, and also to ensure that protests do not disrupt the University's essential functions or affect the education and wellbeing of other students. The vast majority of taught students have now completed their academic degrees and have been able to enjoy well-earned celebrations at the end of a difficult year.

From the start of this most recent escalation in violence, we have been in very frequent contact with students and staff who have been directly impacted by the war, including members of our Palestinian and Israeli communities, and others who have been directly and indirectly affected by the conflict. We will continue to maintain this vital dialogue and to provide support for our students. We have focused on balancing rights and responsibilities during this difficult time. The right to protest, debate, and challenge ideas, is fundamental to our role as a university, but we do not want any one in our community to feel frightened or unwelcome. Many members of the most directly impacted communities believe that we can, and should, be doing more. We are committed to being a supportive and compassionate institution, and continue to explore how we can provide additional support to those most directly impacted by significant conflict or humanitarian crisis.

One recent response has been the launch of the new Humanitarian Response Fund (HRF). (<https://www.cam.ac.uk/notices/news/university-humanitarian-response-fund>), to help to meet unexpected shortfalls in living costs, as well as exceptional caring responsibilities associated with conflict or crisis, including that in Gaza. The initial contribution from the central University is £100,000, and we encourage others, including Colleges and Departments, to contribute in order to sustain this Fund. A number of initial applications to the HRF have already been received, and processed.

Investments

The University's approach to investment is one of the key issues raised by protesters. The Cambridge University Endowment Fund's (CUEF) investment model is to invest via third-party fund managers. The CUEF invests donations made to the University, its Colleges and associated charitable trusts; and makes distributions to support the University. All investments in the CUEF are made following an extensive due diligence process as well as compliance with all applicable laws. Distributions from the CUEF play an indispensable role in the University's Finances. The CUEF is overseen by the Cambridge University Endowment Trustee Body (CUETB), which has set out Responsible Investment Principles. The CUETB defines Responsible Investment as an approach to investment that explicitly acknowledges the relevance to the CUEF of environmental, social and governance factors.

The Students' Union approved motion, various college-level approved motions, and the students protesting with the Cambridge Encampment for Palestine have expressed concern to us that our current investment may not be in line with our institutional values, especially in relation to the arms/defence industry. The University recognises the strength

of feeling within the community. We therefore commit to working with the Task Force and the Working Group (see roadmap below) to review our approach to responsible investment. This will include consideration of ways of defining and monitoring defence exposures within investment portfolios. For the University, as investor in the CUEF, the relevant bodies involved in such a review are the Finance Committee, the Committee on Benefactions and External and Legal Affairs (CBELA), and University Council, working closely with the CUETB. The outcome of this review, and any proposed changes, will be communicated to the CUETB within the timelines mentioned in the roadmap below.

Partnerships and research

The groups that have been making representations to us have requested that we consider our academic partnerships and research relationships. We believe in openness and transparency in our global partnerships. Our mission is to contribute to society through the pursuit of education, learning and research at the highest international levels of excellence. To that end, we engage with universities and academic institutions around the world, and across all fields of academic activity. We expect our global partnerships to be academically driven. When considering who we work with, we rely on a robust process overseen by Committees such as CBELA and the Research Policy Committee. CBELA considers reputational issues in relation to sources of funds for research collaborations and donations. It can take into account ethical considerations in its assessment of reputational risk. CBELA membership includes elected members of the Council including a student member of the Council.

The University's Research Policy Committee has oversight of strategic relationships with research partners, as well as oversight of industry and international partners in research. The Advisory Group on Research Purpose advises CBELA on certain sources of funds and could in future play a role in advising on collaborations with defence companies. The University commits to reviewing the guidelines that inform academic and industry research ties and collaborations with companies including those falling within the arms/defence category, working through the relevant University committees, and in dialogue with the working group and task force (see roadmap below). Should these reviews propose any change in approach to research partnerships, these will be implemented by the relevant Committees and/or administrative units of the University.

Support for academics and students at risk

The University welcomes students from around the world, including conflict zones. We are an open and international community, and the city of Cambridge itself has City of Sanctuary status. In February 2024 the University of Cambridge signed the pledge to become a University of Sanctuary. It will submit its full application in September 2024, which is the next available opportunity, with active involvement and support from the Colleges. In addition, Cambridge supports the Council for At-Risk Academics (CARA) (<https://www.cara.ngo/>), an organisation that provides urgent assistance to academics facing immediate danger, forced exile, or who choose to continue working in their home countries despite significant risks. In October 2023, the University increased its support to CARA's Fellowship Programme, enabling it to welcome up to three more Palestinian fellows

per year. The University commits to increasing its funding to CARA and the Rowan Williams Fund (<https://www.cambridge-trust.org/scholarships/rowan-williams-cambridge-studentship/>) to enable the number of Palestinian fellows supported to increase in the academic year 2024-2025 and onwards. As a result of this commitment, a Palestinian scholar has already been accepted to come to Cambridge shortly with their family.

We share the horror of our students at the loss of life, and the appalling destruction of education institutions and infrastructure in Gaza. We are keen to convene and support the processes of reconstruction that will follow the cessation of violence, building on knowledge and expertise within Cambridge (including our colleagues in the Faculty of Education and Cambridge University Press and Assessment), and committing our own networks and resources to ensure that these processes reflect the needs of the Palestinian people. The University also commits to expanding the academic support schemes open to impacted Palestinian students through (but not limited to): undergraduate and postgraduate scholarships, fully funded residential placements for visiting doctoral students, fully funded residential placements for academics, clinical placements for medical students, individual grants for researchers from Palestine.

In addition, the Institute for Continuing Education (ICE) (<https://www.ice.cam.ac.uk/>) has recently offered places to Palestinian students to attend the University of Cambridge's International Summer Programme (<https://www.ice.cam.ac.uk/courses/international-summer-programmes>) free of charge. Using a combination of sources, ICE, participating colleges and the University will cover the cost of the tuition and accommodation for the period of the course, and travel, visas and other expenses.

We will work with our colleagues in the University's Development and Alumni Relations office, and with Colleges, to raise additional resources to support these efforts. Work on these programmes will begin as soon as possible, with a particular focus on new scholarships being available for the next admissions cycle (for arrival in October 2025).

Roadmap and commitments

We are aware that the students who have been participating in the protests are seeking firm commitments and a clear roadmap. In light of where we are in our current academic cycle, many of the governance processes that comprise that roadmap will not convene till the start of the new academic year. This is not a reason for inaction in the intervening period, and we propose to establish a working group that will continue the dialogue that has already started, which will work through the summer and prepare for input into the committees that are responsible for next steps, beginning with their first meetings. The University fully commits to this process and its various streams of work. We will ensure that the review processes relating to responsible investments and research relationships outlined in this document take place rapidly during Michaelmas Term 2024, with the aim of arriving at initial positions by the end of the term. The University will also keep the community updated on progress throughout.

We are also aware that the students would like their views to be represented in the consideration of these important issues and have proposed to set up their own task force, which will form part of the working group that we intend to establish. We welcome this

engagement. We expect that this task force will elect its own members, and will be self governing. Members of the task force will become part of the wider working group, which will be expected to make recommendations to subsequent meetings of the relevant governance committees that oversee policies in relation to research, investments and partnerships. The overall process will be conducted in a spirit of collaboration and transparency and there will be an iterative dialogue between the University's committees and the task force as well as the working group throughout the development of the policies. We will treat the opinions of the students on the task force with respect, and expect the working group to develop consensual approaches to arrive at their recommendations. The wider University community will be provided with regular updates on progress towards these commitments made by the University, its relevant committees, branches, or institutions, and the working group.

As we write this, our thoughts remain with all those who are affected by the tragic events taking place in Gaza, other parts of Palestine, Israel and elsewhere, and we hope that the painful process of rebuilding lives and institutions can start in earnest. This will be a long journey, and we are committed, as an institution, to playing our part in these processes.

Professor Deborah Prentice, Vice Chancellor

Professor Kamal Munir, Pro-Vice-Chancellor for University Community and Engagement

Professor Bhaskar Vira, Pro-Vice-Chancellor for Education



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Published

17 Jul 2024

First Witness Statement of Michael Abberton
Intervener
MA7
12 March 2025

Claim No: KB-2025-000497

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Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

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EXHIBIT “MA7”

source: <https://www.varsity.co.uk/news/28558>
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Cambridge delays arms investment review

The University pledged to produce findings this term but has pushed back its deadline, leading to allegations of ‘watering down’ the review



The University published its terms of reference for an ongoing review of its ties to the defence industry on Wednesday
CHRISTOPHER LORDE FOR VARSITY

by Felix Armstrong
Friday November 15 2024, 12:00am

Cambridge has delayed its review of arms investments, which was sparked by pro-Palestine protests, provoking accusations of “back-peddalling” and “watering down” its commitments to students.

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This comes as 165 academic and admin staff have formally called on the University to cut ties with the arms industry entirely. Cambridge has **admitted** that its initial “timescales” for reviewing its weapons ties were “optimistic”.

REVIEW OF ITS TIES TO THE WEAPONS INDUSTRY ON Wednesday (10/11), in which it said that its working group will have completed its work “by the end of the academic year”.

But, in a **statement** urging students to abandon the pro-Palestine encampment, published in July, the University pledged that this working group would operate “rapidly” in Michaelmas term 2024, and “reach initial positions by the end of term”.

One source close to the matter has accused the University of “backtracking” on its investigation of its ties with arms. *Varsity* understands that the first meeting of the working group has not yet taken place.

Announcing the working group’s targets, Cambridge said that it is “aware that many members of the University are deeply concerned about the tragic events unfolding in many parts of the world”.

When first announcing the review, University heads said: “We share the horror of our students at the loss of life, and the appalling destruction of education institutions and infrastructure in Gaza.”

Initially established in response to repeated pro-Palestine **protests** at the University over the year, the working group’s objectives have now been formalised, in response to a staff-submitted **motion** for Cambridge to cut ties with the arms industry.

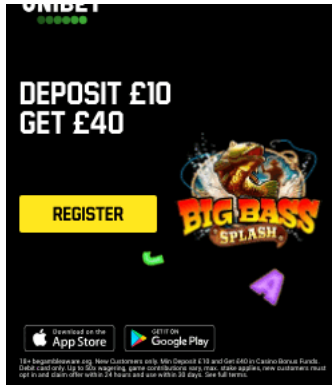
This **motion**, submitted shortly after the Cambridge for Palestine (C4P) encampment was **dismantled** in July, has now been accepted by University Council, Cambridge’s executive decision-making body. It was signed by 165 members of Regent House, the University’s democratic body, of which admin and academic staff are members.

This means that the Council will be formally called upon to divest from arms by the beginning of next year, and produce a report detailing the costs and timetable for doing so.

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This motion will pass unless it is put to a vote in Regent House before November 22. Cambridge’s **statutes** require 25 staff to call for a ballot, which a source close to the matter has described as “unlikely”.



The council has insisted that, if passed, the motion would not “be binding,” because the council “has sole responsibility for decisions about investments”.

The working group assessing Cambridge’s ties to the arms industry will include two student representatives nominated by C4P, and a further student member of the Council. Some of the academics behind the divestment motion will also be part of the group, *Varsity* understands.

Jason Scott-Warren, an English academic and member of University Council, told *Varsity*: “I am pleased that the University is reconsidering its arms industry investments and research ties, but I’m concerned that, in its approach to the grace, it may be watering down undertakings made to students a the encampment.”

“The working group needs to move swiftly and to register the strength of the case for radical change,” he added.

The terms of reference for the working group reveal that Cambridge will consider its ties to arms in relation to “national security,” and the University’s position as a “civic institution in the UK”.

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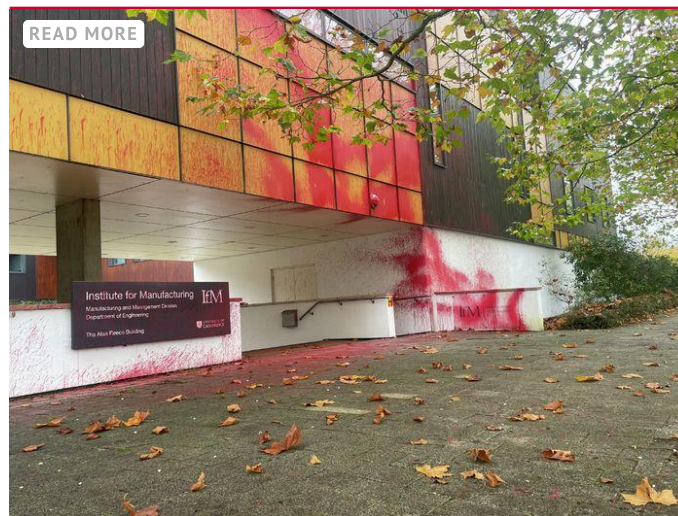
The University has faced frequent pro-Palestine protests in recent months, with some activists targeting its [manufacturing institute](#)'s alleged links to companies which feature on Israel boycott lists, including BAE Systems, [Siemens](#), and Rolls Royce, referred to by activists as “institutes of death”.

academic freedom and freedom of speech. In its [request](#) for students to dismantle the pro-Palestine encampment, Cambridge revealed that the Office for Students had written to the University, and others, to remind it of its “legal duty to protect freedom of speech and the right to protest within the law”.

Earlier this term, former Home Secretary Suella Braverman [accused](#) pro-Palestine activists at the University of “mob rule,” though this claim was fiercely [rejected](#) by campaigners.

The announcement states that Cambridge will reconsider its definition of defence companies, and examine both its investments in and research partnerships with the weapons industry.

The council also says that it will discuss its review with other “comparable institutions,” who are “currently engaged in similar processes”. Students set up pro-Palestine encampments at multiple other UK universities this summer, with several, including [King’s College London](#) and [York](#), committing to arms reviews or full divestment.

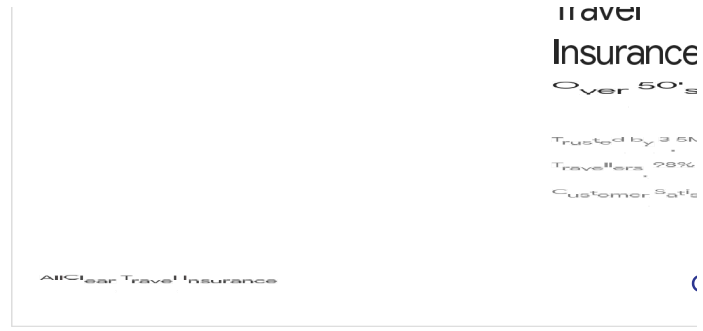


Pro-Palestinian students spray University Institute for Manufacturing with red paint

Sarah Anderson and Sumouli Bhattacharjee, Students’ Union undergraduate and postgraduate presidents, told *Varsity*: “It is SU policy to campaign for the demilitarisation of the University. This means that we campaign for the University to cut ties with all military and arms companies, particularly through our membership of key committees including University Council.”

“We are therefore pleased to finally see the establishment of this working group and hope that it is able to make swift recommendations which are taken seriously by the University going forward,” they said.

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Student action at Cambridge has also targeted colleges. Earlier this year, King’s College **committed** to reviewing its investments in arms, following student pressure. Trinity has also faced repeated **protest** following a legal **warning** over its ties to Elbit systems, an Israel-based arms company.

In an online **statement**, Cambridge University mentioned its “constructive dialogue” with Cambridge for Palestine and the working group that followed.

The University said: “Whilst these steps were criticised by some the University Council has supported this significant step forward. Plainly, work of this complexity and scale takes time, and earlier timescales were optimistic. The working group will now begin its activities and report in due course.”

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!

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Intervener
MA8
12 March 2025

Claim No: KB-2025-000497

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PALESTINE-ISRAEL CONFLICT, WITHOUT THE CLAIMANT'S CONSENT**

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**ON, THE FOLLOWING SITES (AS SHOWN FOR IDENTIFICATION EDGED RED ON
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**(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

EXHIBIT "MA8"

source: <https://www.varsity.co.uk/news/28689>
accessed: 11/03/2025

1250

University threatens pro-Palestinian encampments with legal action

The University has allegedly halted all discussions with a student-led task force on arms divestment



C4P originally occupied the lawn outside of King's College in May
TAMAMI ONO FOR VARSITY

by **Wilf Vall**

Friday November 29 2024, 7:58pm

The University of Cambridge has threatened pro-Palestinian students with legal action over encampments “disrupting the University’s administrative activities”.

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Cambridge for Palestine (C4P), who set up an **encampment** on Senate House lawn earlier this week, claim to have been served with notices for impending legal action if they continue their occupation.

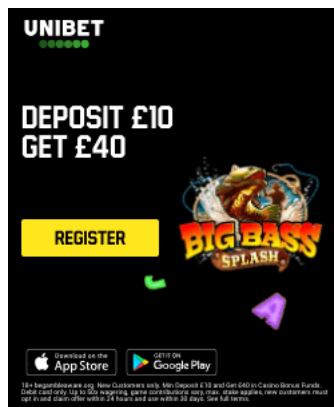
The group also claims that the University has halted all discussions with a previously established student-led task force on arms divestment. This comes after the task force was set up as

ON KING'S COLLEGE.

C4P originally occupied the lawn outside of King's College in May, claiming that they would not leave until the University disclosed and divested all its investments in arms industries. The camp was dismantled in July after the University agreed to set up a working group that would review all of its arms investments by the end of Michaelmas term. Part of this working group was intended to include a task force with six students advising policy.

However, the University has since been **accused** of “watering down” the proposed arms review, after they delayed publishing the review until the end of academic year, admitting that its initial “timescales” for reviewing its weapons ties were “optimistic”.

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C4P have also **claimed** that the University is breaking their agreement with students on the arms review, after they allegedly restructured the taskforce to have two, rather than six, students.

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The University has not previously stated their intent to use legal action against protesting students, claiming that they were committed to “freedom of speech within the law and we acknowledge the right to protest” in relation to the original encampments set up in May.

This news comes after the University was **forced** to relocate graduations due to happen tomorrow (30/11) from Senate House to Great St. Mary's church earlier today in order to “minimise the

participating.

The group also previously set up an [encampment](#) on Senate House in May this year, forcing graduations to be moved to Downing College. C4P then dismantled this encampment after the University agreed to provide amnesty to representatives who wished to engage in conversation with the pro-vice-chancellors for a negotiation meeting.

The group have also occupied Greenwich House, which manages the University's administrative and financial functions, in an escalation the group claims is in response to the University "breaking" its agreements.

C4P have published a new set of demands, which include include requesting the University to "publicly condemn the genocide of the Palestinian people," "meet with all 12 elected members of the task force and accept a chair that [C4P] select," and that the University "immediately carry out an aggregate analysis of its investments".

The University of Cambridge 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.

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First Witness Statement of Michael Abberton
Intervener
MA9
12 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
BETWEEN:**

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

Claimant

- and -

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Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT “MA9”

source: <https://www.icc-cpi.int/news/situation-state-palestine-icc-pre-trial-chamber-i-rejects-state-israels-challenges>
accessed: 11/03/2025

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› Situation In The State of Palestine: ICC Pre-Trial Chamber I Rejects The State of Israel's Challenges To Jurisdiction and Issues Warrants of Arrest For Benjamin Netanyahu and Yoav Gallant

Press Release: 21 November 2024 | العربية עברית

Situation in the State of Palestine: ICC Pre-Trial Chamber I rejects the State of Israel's challenges to jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant



Today, on 21 November 2024, Pre-Trial Chamber I of the International Criminal Court ("Court"), in its composition for the *Situation in the State of Palestine*, unanimously issued two decisions rejecting challenges by the State of Israel ("Israel") brought under articles 18 and 19 of the Rome Statute (the "Statute"). It also issued warrants of arrest for Mr Benjamin Netanyahu and Mr Yoav Gallant.

Decisions on requests by the State of Israel

The Chamber ruled on two requests submitted by the Israel on 26 September 2024. In the first request, Israel challenged the Court's jurisdiction over the *Situation in the State of Palestine* in general, and over Israeli nationals more specifically, on the basis of article 19(2) of the Statute. In the second request, Israel requested that the Chamber order the Prosecution to provide a new notification of the initiation of an investigation to its authorities under article 18(1) of the Statute. Israel also requested the Chamber to halt any proceedings before the Court in the relevant situation, including the consideration of the applications for warrants of arrest for Mr Benjamin Netanyahu and Mr Yoav Gallant, submitted by the Prosecution on 20 May 2024.

As to the first challenge, the Chamber noted that the acceptance by Israel of the Court's jurisdiction is not required, as the Court can exercise its jurisdiction on the basis of territorial jurisdiction of Palestine, as determined by Pre-Trial Chamber I in a previous composition. Furthermore, the Chamber considered that pursuant to article 19(1) of the Statute, States are not entitled to challenge the Court's jurisdiction

under article 19(2) prior to the issuance of a warrant of arrest. Thus Israel's challenge is premature. This is without prejudice to any future possible challenges to the Court's jurisdiction and/or admissibility of any particular case.

[Decision on Israel's challenge to the jurisdiction of the Court pursuant to article 19\(2\) of the Rome Statute](#)

The Chamber also rejected Israel's request under article 18(1) of the Statute. The Chamber recalled that the Prosecution notified Israel of the initiation of an investigation in 2021. At that time, despite a clarification request by the Prosecution, Israel elected not to pursue any request for deferral of the investigation. Further, the Chamber considered that the parameters of the investigation in the situation have remained the same and, as a consequence, no new notification to the State of Israel was required. In light of this, the judges found that there was no reason to halt the consideration of the applications for warrants of arrest.

[Decision on Israel's request for an order to the Prosecution to give an Article 18\(1\) notice](#)

Warrants of arrest

The Chamber issued warrants of arrest for two individuals, Mr Benjamin Netanyahu and Mr Yoav Gallant, for crimes against humanity and war crimes committed from at least 8 October 2023 until at least 20 May 2024, the day the Prosecution filed the applications for warrants of arrest.

The arrest warrants are classified as 'secret', in order to protect witnesses and to safeguard the conduct of the investigations. However, the Chamber decided to release the information below since conduct similar to that addressed in the warrant of arrest appears to be ongoing. Moreover, the Chamber considers it to be in the interest of victims and their families that they are made aware of the warrants' existence.

At the outset, the Chamber considered that the alleged conduct of Mr Netanyahu and Mr Gallant falls within the jurisdiction of the Court. The Chamber recalled that, in a previous composition, it already decided that the Court's jurisdiction in the situation extended to Gaza and the West Bank, including East Jerusalem. Furthermore, the Chamber declined to use its discretionary *proprio motu* powers to determine the admissibility of the two cases at this stage. This is without prejudice to any determination as to the jurisdiction and admissibility of the cases at a later stage.

With regard to the crimes, the Chamber found reasonable grounds to believe that Mr Netanyahu, born on 21 October 1949, Prime Minister of Israel at the time of the relevant conduct, and Mr Gallant, born on 8 November 1958, Minister of Defence of Israel at the time of the alleged conduct, each bear criminal responsibility for the following crimes as co-perpetrators for committing the acts jointly with others: the war crime of starvation as a method of warfare; and the crimes against humanity of murder, persecution, and other inhumane acts.

The Chamber also found reasonable grounds to believe that Mr Netanyahu and Mr Gallant each bear criminal responsibility as civilian superiors for the war crime of intentionally directing an attack against the civilian population.

Alleged crimes

The Chamber found reasonable grounds to believe that during the relevant time, international humanitarian law related to international armed conflict between Israel and Palestine applied. This is because they are two High Contracting Parties to the 1949 Geneva Conventions and because Israel occupies at least parts of Palestine. The Chamber also found that the law related to non-international armed conflict applied to the fighting between Israel and Hamas. The Chamber found that the alleged conduct of Mr Netanyahu and Mr Gallant concerned the activities of Israeli government bodies and the armed forces against the civilian population in Palestine, more specifically civilians in Gaza. It therefore concerned the relationship between two parties to an international armed conflict, as well as the relationship between an occupying power and the population in occupied territory. For these reasons, with regards to war crimes, the Chamber found it appropriate to issue the arrest warrants pursuant to the law of international armed conflict. The Chamber also found that the alleged crimes against humanity were part of a widespread and systematic attack against the civilian population of Gaza.

The Chamber considered that there are reasonable grounds to believe that both individuals intentionally and knowingly deprived the civilian population in Gaza of objects indispensable to their survival, including food, water, and medicine and medical supplies, as well as fuel and electricity, from at least 8 October 2023 to 20 May 2024. This finding is based on the role of Mr Netanyahu and Mr Gallant in impeding humanitarian aid in violation of international humanitarian law and their failure to facilitate relief by all means at its disposal. The Chamber found that their conduct led to the disruption of the ability of humanitarian organisations to provide food and other essential goods to the population in need in Gaza. The aforementioned restrictions together with cutting off electricity and reducing fuel supply also had a severe impact on the availability of water in Gaza and the ability of hospitals to provide medical care.

The Chamber also noted that decisions allowing or increasing humanitarian assistance into Gaza were often conditional. They were not made to fulfil Israel's obligations under international humanitarian law or to ensure that the civilian population in Gaza would be adequately supplied with goods in need. In fact, they were a response to the pressure of the international community or requests by the United States of America. In any event, the increases in humanitarian assistance were not sufficient to improve the population's access to essential goods.

Furthermore, the Chamber found reasonable grounds to believe that no clear military need or other justification under international humanitarian law could be identified for the restrictions placed on access for humanitarian relief operations. Despite warnings and appeals made by, *inter alia*, the UN Security Council, UN Secretary General, States, and governmental and civil society organisations about the humanitarian situation in Gaza, only minimal humanitarian assistance was authorised. In this regard, the Chamber considered the prolonged period of deprivation and Mr Netanyahu's statement connecting the halt in the essential goods and humanitarian aid with the goals of war.

The Chamber therefore found reasonable grounds to believe that Mr Netanyahu and Mr Gallant bear criminal responsibility for the war crime of starvation as a method of warfare.

The Chamber found that there are reasonable grounds to believe that the lack of food, water, electricity and fuel, and specific medical supplies, created conditions of life calculated to bring about the destruction of part of the civilian population in Gaza, which resulted in the death of civilians, including children due to malnutrition and dehydration. On the basis of material presented by the Prosecution covering the period until 20 May 2024, the Chamber could not determine that all elements of the crime against humanity of extermination were met. However, the Chamber did find that there are reasonable grounds to believe that the crime against humanity of murder was committed in relation to these victims.

In addition, by intentionally limiting or preventing medical supplies and medicine from getting into Gaza, in particular anaesthetics and anaesthesia machines, the two individuals are also responsible for inflicting great suffering by means of inhumane acts on persons in need of treatment. Doctors were forced to operate on wounded persons and carry out amputations, including on children, without anaesthetics, and/or were forced to use inadequate and unsafe means to sedate patients, causing these persons extreme pain and suffering. This amounts to the crime against humanity of other inhumane acts.

The Chamber also found reasonable grounds to believe that the abovementioned conduct deprived a significant portion of the civilian population in Gaza of their fundamental rights, including the rights to life and health, and that the population was targeted based on political and/or national grounds. It therefore found that the crime against humanity of persecution was committed.

Finally, the Chamber assessed that there are reasonable grounds to believe that Mr Netanyahu and Mr Gallant bear criminal responsibility as civilian superiors for the war crime of intentionally directing attacks against the civilian population of Gaza. In this regard, the Chamber found that the material provided by the Prosecution only allowed it to make findings on two incidents that qualified as attacks that were intentionally directed against civilians. Reasonable grounds to believe exist that Mr Netanyahu and Mr Gallant, despite having measures available to them to prevent or repress the commission of crimes or ensure the submittal of the matter to the competent authorities, failed to do so.

Background

On 1 January 2015, The State of Palestine lodged a declaration under article 12(3) of the Rome Statute accepting jurisdiction of the Court since 13 June 2014.

On 2 January 2015, The State of Palestine acceded to the Rome Statute by depositing its instrument of accession with the UN Secretary-General. The Rome Statute entered into force for The State of Palestine on 1 April 2015.

On 22 May 2018, pursuant to articles 13(a) and 14 of the Rome Statute, The State of Palestine referred to the Prosecutor the Situation since 13 June 2014, with no end date.

On 3 March 2021, the Prosecutor announced the opening of the investigation into the Situation in the State of Palestine. This followed Pre-Trial Chamber I's [decision](#) on 5 February 2021 that the Court could exercise its criminal jurisdiction in the Situation and, by majority, that the territorial scope of this jurisdiction extends to Gaza and the West Bank, including East Jerusalem.

On 17 November 2023, the Office of the Prosecutor received a further referral of the Situation in the State of Palestine, from South Africa, Bangladesh, Bolivia, Comoros, and Djibouti, and on 18 January 2024, the Republic of Chile and the United Mexican State additionally submitted a referral to the Prosecutor with respect to the situation in The State of Palestine.

For further information, please contact Fadi El Abdallah, Spokesperson and Head of Public Affairs Unit, International Criminal Court, by telephone at: +31 (0)70 515-9152 or +31 (0)6 46448938 or by e-mail at: fadi.el-abdallah@icc-cpi.int

You can also follow the Court's activities on [Twitter](#), [Facebook](#), [Tumblr](#), [YouTube](#), [Instagram](#) and [Flickr](#)

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First Witness Statement of Michael Abberton
Intervener
MA10
12 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
BETWEEN:**

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

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Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT “MA10”

source: <https://www.alhaq.org/advocacy/24960.html>
accessed: 11/03/2025



Legal pressure mounts over northern Gaza crisis as UK Government returns to High Court in Israel arms exports challenge

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Global Legal Action Network and Al-Haq continue their legal challenge to suspend UK exports of F-35 fighter jet components and weapons used by Israel as they commit atrocity crimes in Gaza. As the catastrophic humanitarian conditions worsen in Gaza, a hearing in the Royal Courts of Justice is set to consider the lawfulness of the exemption of

F-35 fighter jet parts from a UK arms suspension, despite the UK Government's own assessment that there is a "clear risk" that F-35 jets (and other British weapons) could be used in serious violations of international humanitarian law. The on-going challenge could also be expanded to include the UK government's lack of red lines for imposing a full export ban on weapons to Israel as the groups this week sent the government notice of the intention to take fresh legal action. The case, brought by Global Legal Action Network (GLAN) and Al-Haq, began by challenging all weapons exports to Israel for use in Gaza. However, since a partial suspension on 2 September 2024, the case now focusses on the decision to exempt some exports for F-35 fighter jet components from the September suspension. The Government has assessed that there is a 'clear risk that the items might be used to commit or facilitate serious violations of international law' - but is still allowing parts to be transferred to Israel indirectly, through a global supply chain. In a novel development, it is unclear whether the government took into account the possibility that selling arms to Israel could have domestic criminal consequences under the Geneva Conventions Act 1957 or the International Criminal Court Act 2001. If the government did not properly take this into account or proceeded despite the recognition of a high risk of criminal offences taking place, it could mean that the decision to continue transferring F-35s was unlawful. The upcoming hearing will see a High Court judge

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decide which grounds may continue to a final hearing, and when that hearing should be. **Fresh legal challenge** Al-Haq and GLAN have also sent the government a pre-action protocol (PAP) letter for judicial review based on new elements of the case including:

- **Ongoing atrocities in northern Gaza**
 - On an urgent basis ahead of the hearing, Al-Haq has written to the Government to inform them that they must immediately review the decision to continue to supply arms through the F-35 programme in light of the escalated, man-made humanitarian catastrophe being inflicted by Israel on Palestinians in northern Gaza.

- **Foreign Secretary David Lammy's incorrect definition of genocide**
 - In comments in Parliament on 28 October 2024, MP David Lammy displayed a fundamental misunderstanding of the definition of the term 'genocide', saying it only applies in situations where "*millions of people lost their lives in crises such as Rwanda and the Holocaust of the second world war*", and that, accordingly, evaluating Israel's attack on Gaza in terms of genocide "*undermines [the] seriousness*" of the term. Al-Haq's case already argues that the government's repeated failure to stop arms exports to Israel stems from an incorrect interpretation of its obligation to prevent genocide, especially considering the three provisional measures orders issued by the ICJ earlier this year.

- **Lack of red lines**
 - Al-Haq's urgent letter has requested that the Government stipulate which 'red lines' it has for completely ending arms exports to Israel. As the Government is continuing exports through the F-35 programme citing international peace and security concerns as outweighing its own assessment that there is a clear risk of Israel using them to commit serious violations of IHL (i.e. war crimes), it is not at all clear whether there is any point at which these parts would be suspended.

Notes to Editors: The PAP letter can be viewed confidentially. GLAN and Al-Haq representatives are available for interview or further comment. **Al-Haq** is an independent Palestinian non-governmental human rights organisation based in Ramallah, West Bank. It was established in 1979 to protect and promote human rights and the rule of law in the Occupied Palestinian Territory, and the organisation has special consultative status with the United Nations

Economic and Social Council. Al-Haq documents violations of the individual and collective rights of Palestinians in the OPT and in doing so, it conducts research; prepares reports, studies and interventions on breaches of international human rights and humanitarian law in the OPT and the Palestinian people's right to self-determination; and undertakes advocacy before local, regional and international bodies. For its work protecting and promoting human rights, Al-Haq has been awarded numerous international awards. alhaq.org **Global Legal Action Network (GLAN)** is a U.K.-based legal non-profit organisation with offices in the U.K. and Ireland. GLAN works with affected communities to pursue innovative legal actions across borders to challenge powerful actors involved in human rights violations and systemic injustice. glanlaw.org

ALSO ON ALHAQ

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On 18 August 2022, Israeli Occupying Forces (IOF) raided the offices of several

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First Witness Statement of Michael Abberton
Intervener
MA11
12 March 2025

Claim No: KB-2025-000497

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EUROPEAN LEGAL SUPPORT CENTRE

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EXHIBIT “MA11”

source: <https://www.ucu.cam.ac.uk/cucu-motion-defend-the-right-to-protest/>
accessed: 11/03/2025

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University of Cambridge Branch

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CUCU motion: Defend the right to protest

📅 February 19, 2025 📁 Motions

Motion – Defend the right to protest
Passed unanimously at CUCU Emergency General Meeting, 11 February 2025

This branch notes:

- That on 4 October 2024, the UN Special Rapporteur on the rights to freedom of assembly and association, Gina Romero stated that Universities must take immediate steps to safeguard the right to protest peacefully on campuses in solidarity with the Palestinian people.
- That recent months have seen increasing use of High Court injunctions, criminal investigations and prosecutions on

Recent Posts

- UCU General Secretary to University of Cambridge VC: drop your injunction suppressing free speech *(February 26, 2025)*

- Unions Launch Campaign to Save the Vet School *(February 21, 2025)*

1263

serious criminal charges against activists for acts of non-violent protest and political speech related to Palestine.

- That the University of London successfully applied to the High Court for an interim injunction in October 2024 which seeks to ban collective protest by two named students at SOAS and one SOAS graduate, two student-led campaigns and ‘persons unknown’ calling for boycott, divestment and sanctions in solidarity with Palestine on land between SOAS and Birkbeck
- That the University of Cambridge Registrar has stated that the University intends to apply for an injunction with the aim of preventing future disruptions to Congregations or the “daily work” of University staff.
- That penalties for breaching an injunction may include imprisonment, seizure of assets and fines, in effect introducing severe criminal penalties for acts which are otherwise lawful, such as peaceful protest.
- That the situation in Palestine continues to deteriorate, following Donald Trump’s support for the forced displacement of Palestinians from Gaza, in statements which have been widely condemned.
- That the University of Cambridge has not yet taken any meaningful action to divest from or cease research partnerships with institutions and companies complicit in war crimes, genocide and ethnic cleansing of Palestinians.

This branch believes:

- That the use of injunctions by Universities to restrict protests and occupations is a serious threat to freedom of assembly and expression
- That disruptive protest plays a critical role in advancing and protecting democratic rights, including workers’ rights to strike and organise in trade unions

This branch resolves:

- CUCU motion: Defend the right to protest
(February 19, 2025)
-

- Cambridge University Week Against Racism – 17-21 March 2025
(February 5, 2025)
-

- Statement on the Cambridge for Palestine occupation and call for day of action 28 November
(November 25, 2024)
-

- Cambridge needs a payrise! Resources and updates on our campaign for Cambridge weighting
(November 21, 2024)
-

- J4CS Campaign Update – November 2024
(November 11, 2024)
-

- Cambridge Researchers Report highlights pay pressures, job insecurity and “a culture of overwork”
(May 22, 2024)
-

- To coordinate a campaign with students and other campus unions against the University's attempts to suppress protest rights
- To send a message of solidarity those targeted by the University of London anti-protest injunction
- To call on the UCU NEC to initiate a national campaign in defence of protest rights on campus and provide support for branches and students facing repression and disciplinary action for their solidarity with Palestine.

- Joint UCU branch statement on the Oxford and Cambridge Palestine solidarity encampments (*May 6, 2024*)

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Against Racism - 17-21 March
2025

Unions Launch Campaign to
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Get in touch

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First Witness Statement of Jenny Hardacre
Intervener
12 March 2025

Claim No: KB-2025-000497

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Defendants

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EUROPEAN LEGAL SUPPORT CENTRE

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FIRST WITNESS STATEMENT OF JENNY HARDACRE

I, Jenny Hardacre, of [REDACTED] will say as follows:

1. I am the current chair of Cambridge Palestine Solidarity Campaign ('Cambridge PSC'). We have a membership of approximately 130 consisting of Cambridgeshire residents and many more supporters on our social media platforms.
2. On 12 March 2025, the committee discussed and agreed on the following statement, which we want to bring to the attention of the court:
 - 2.1. Cambridge PSC has existed since 1990 and has run a weekly stall in Market Square for the last 25 years. Many of our members have been

consistently active in Cambridge for over 20 years. We appreciate that the University has often offered valuable support and opportunities to individual students and academics and has hosted many speakers who support the Palestinian cause. However, we have frequently publicly expressed, in various ways, our objection to speaker events, research collaborations and financial investments which reinforce the oppression of the Palestinian people. We have often worked in cooperation with students and are part of the Cambridge For Palestine coalition. We wholeheartedly supported the encampments at King's college and Senate House Yard and the occupation of Greenwich House and we endorse the students' aims.

- 2.2. In a city which is so dominated by the University, residents are entitled to hold and express views about its behaviour. The proposed Injunction, which is singularly aimed against pro-Palestinian protests, and which by its wording of 'persons unknown' and loosely defined 'interference' potentially extends its reach to public areas beyond University land, such as the open area in front of Great St Mary's Church, which is adjacent to Senate House Yard, and has been used for rallies for decades. We are concerned that rallies in this area might be deemed to "block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land." The injunction would therefore impact, not only on our activities, but those of the public in general. We consider this a threat to free speech and our right to oppose colonisation, apartheid and genocide.

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:



Dated: 12th March 2025

First Witness Statement of Augustin Denis

Intervener

13 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
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
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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

Intervener

FIRST WITNESS STATEMENT OF AUGUSTIN DENIS

I, Augustin Denis, of [REDACTED] will say as follows:

1. I am Augustin Denis a PhD student in Film and Screen Studies at the University of Cambridge. I am also one of the Postgraduate Representatives at the Cambridge branch of the University and College Union.
2. I have been participating in pro Palestine rallies in Cambridge since October 2023 and particularly between May to July 2024 at the time of the King's College encampment. Those rallies have been organized by a variety of groups, from Stop the War to PSC including rallies happening during TUC called workplace days of action. Those rallies have most often been held outside the gates of Senate House Yard and have occasionally

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moved to the front of Old Schools. One of those rallies, in June 2024, although I can't remember the exact date, turned into a sit-in in front of Old Schools. Sometimes, most often when the rallies were called by the Palestine Society, which is a student society registered with the Student's Union, they would happen on the University's Sidgwick Site.

3. The sit-in in front of Old Schools in June 2024, which I was present at, did slow some people down came to and from Old Schools but no adverse interaction between protestors and people accessing the building came from it. Usually, when a rally moves to the front of Old Schools, the doors are shut and locked. This means that occasionally people who are meant to work in the building cannot access it. Some frustration arises occasionally between the people wanting to enter and the University's buildings operations staff.
4. On 30 November 2024, I participated in a protest in front of the graduation ceremony at Great St Mary's, the protest was peaceful, although loud, and the graduation ceremony went ahead without disruption on the day.
5. I have no awareness of any rules for seeking permission for protesting or other activities on campus, apart from building security rules that are sent to you when trying to book a room with the form requesting payment.
6. I have never sought consent for holding activities on campus and I do not know what the process is for seeking consent on campus for activities such as protests.
7. To my knowledge freedom of speech was invoked by the Vice-chancellor in her communications about the encampment (1 August 2024, Hearing Bundle page 194) but I have not otherwise seen evidence of the Freedom of Speech code of practice being applied on campus.
8. I am worried that if this injunction is granted that all the protests I have been a part of would put me in contempt of court. My understanding of this criminalization, if it were to go forward, would mean that any type of expression of Palestine activism would then have the potential to become criminal.
9. The injunction would mean that I would not be able to express my pro-Palestine beliefs publicly, without risking being criminalized. Many other organisations I am a part of, like the UCU, organize other types of protests. Last week, on Tuesday 4 March, a protest was held to protect the Vet School. I anticipate that, because our branch has made many statements of support for Palestine activism, that many of its activities could be targeted by the injunction, as the branch's stance on Palestine traverses its stance on many other

issues it regularly organizes around and there is a high likelihood that when campaigning on other issues, connections with Israel/Palestine will also be made or supporters may also come with Palestine flags or leaflets to other UCU activities.

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: Augustin Denis



Dated: 13 March 2025

First Witness Statement of Amelia Hassoun
Intervener
14 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BETWEEN:**

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CB2 1TA**

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

Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

FIRST WITNESS STATEMENT OF AMELIA HASSOUN

I, Dr Amelia Hassoun, of Darwin College, Silver Street, Cambridge CB3 9EU will say as follows:

1. I am currently a Research Fellow at Darwin College, University of Cambridge. My research focuses on the sociopolitical effects of digital technologies on marginalized peoples and social movements. I have been a member of the University community for the past four years and have been actively involved in various aspects of University life, including mentoring students. I am also British-Palestinian.
2. I have been involved with teach-ins, rallies, and supporting students who have expressed their right to protest against Cambridge University's investments in arms.
3. I believe that the injunction, if enacted, would have a profound and disproportionately negative impact on Palestinian students and staff, including myself, as well as other groups with protected characteristics expressing solidarity with Palestinians and protesting the University's investments in weapons.
4. For Palestinian students and staff (including myself), the injunction targets activism related to Palestine. For individuals who identify as Palestinian or who have strong ties to Palestine, this measure would create a chilling effect on our ability to express our political beliefs and advocate for our community. For Palestinian individuals like me, this measure represents a direct assault on our ability to express our national identity, political beliefs, and advocate for our community within Cambridge University. The injunction, whether it names Palestine or not, targets our national identity and lived experiences, leading to marginalization and exclusion from campus discourse, as well as a feeling of being specifically singled out as unwelcome. Unlike other specific national/ethnic groups experiencing state-sanctioned violence abroad, like our Ukrainian colleagues, whose speech and expression has received support from the University (and certainly has not been targeted by the University), this injunction singles out Palestinians based on their national and ethnic identity and limits our expression (and expressions of solidarity on our behalf) as it is protests on behalf of Palestine that have led to the injunction being sought. It would further exacerbate existing feelings of being targeted based on our nationality and being treated differently by the University from those belonging to national and ethnic groups experiencing similar violence.

5. It is especially important for me as a Palestinian to protest in this moment because of the brutal genocide enacted against my people, which the University is complicit in. I experience specific and acute harm from the University's refusal to divest given this violence, which has killed over 80 members of my family. For Palestinian protestors, and our advocates, it is not a level playing field because we are protesting against the current status quo where the University's interests are in continuing to invest in weapons companies that are enabling the genocide.
6. Protests at Senate House have included many protests for those killed by weapons provided to Israel, made by companies that the University invests in. Protests have included interfaith vigils, vigils for healthcare workers killed, stories from children and grandchildren of Nakba survivors, commemorations of Palestinian students who will not graduate because they were killed, readings of poems written by Palestinian children experiencing brutal violence, and other such meaningful acts of speech and expression. The area in front of Senate House is important in the context of the University because protests can be seen by the people in charge and who may make decisions on divestment.
7. For those with pro-Palestinian political beliefs: The injunction, by aiming to restrict certain forms of protest and activism, would directly impede the ability of these individuals to exercise their freedom of speech and assembly on a matter of significant political and ethical concern to them. The need to seek consent for various activities, including those around the edges of named sites, could be interpreted and applied in a way that suppresses legitimate forms of dissent and advocacy, particularly for a cause that the University administration may view as contentious. Further, if the injunction is passed, I would be afraid to be caught by the injunction if I were walking through any of these university buildings with cultural symbols of my people – like a keffiyeh or a flag – even on my way to a cultural event like an iftar (breaking of fast for Ramadan) or a poetry reading, both of which I have done in the past. Equivalent symbols in other cultures, like traditional clothing or flags, would not be caught in such a way. This fear disproportionately affects Palestinian staff and students, as staff and students wearing or carrying representations of their own national identities (for example, a Canadian flag or a Scottish tartan) walking through University spaces would not experience similar fear.

8. If the University is seen to be stifling activism related to a specific political cause, it could create a precedent for restricting other forms of political expression or advocacy related to issues that are important to different groups with protected characteristics under the Equality Act. This could foster a general climate of fear and self-censorship on campus, hindering open and critical dialogue on a range of social justice issues. Students have already faced difficulties in booking University rooms for teach-ins and lectures on and even adjacently related to Palestinian human rights.
9. The University of Cambridge has a long and significant history of student protest, addressing a wide range of issues from local university matters to international political events. Throughout the 1960s and 1970s, for example, Cambridge students were actively involved in movements such as the Campaign for Nuclear Disarmament (CND), protesting against nuclear weapons, and demonstrating against state-sanctioned political violence abroad. Students also organized extensively around demands for university reforms, including changes to examinations and the establishment of a student union. More recently, students have protested against student fees and government cuts. Disruption of the University's status quo is in part what makes protests effective and voices heard, and is a key part of the right to protest. The Cambridge students protesting the Vietnam War and apartheid in South Africa were challenging the university's and wider society's complicity in these issues. These student and staff demands for divestment and equity, like the demand for women to be admitted to Cambridge colleges, which seem obviously morally and ethically right today, were disruptive ideas at the time that had to be demonstrated for by students and staff. This history demonstrates that student and staff activism has been a recurring and important feature of university life at Cambridge, providing a platform for members of the community to voice their concerns, advocate for change, and engage with critical social and political issues.
10. Protecting the right to protest is therefore crucial for maintaining a vibrant and democratic university environment where open discourse and the challenging of prevailing ideas are not only permitted but encouraged. It allows students and staff to make their voices heard on matters that affect them and the wider world, contributing to a more engaged and socially conscious university community. Targeting one category of person, Palestinians, and

activism in solidarity with that category of person, therefore excludes them from speaking and membership in that university community.

11. This measure targets me in particular on the basis of my nationality and belief. My identity as a Palestinian individual means that the ongoing injustices and struggles faced by Palestinians are deeply personal and significant to me. They affect me directly. The proposed injunction directly targets me on the basis of my nationality and political beliefs by aiming to suppress activism and advocacy in solidarity with Palestine on campus. My Palestinian identity is politicized – the University and many of its colleges refuse to use the word “Palestine” in communications, only “Gaza”, until it seeks injunction or disciplinary sanction against us. Because of the violence perpetrated on Palestinians now and for the past 75+ years, which institutions like the University of Cambridge actively support through investment in arms, restrictions on freedom of expression and protest disproportionately target Palestinians, whether they are explicitly repressing Palestine protests or not.
12. As a scholar whose research engages with the complexities of identity, marginalization, and the impact of conflict on communities, I strongly believe in the right to protest oppressive and genocidal political and financial structures, especially on University campuses where the University is financially or otherwise involved. As both a Palestinian and a researcher of resistance movements under conditions of repression and constraint, an understanding of the historical and ongoing injustices faced by Palestinians has deeply informed my academic work and my values.
13. As a Palestinian, this measure would have a profound impact on my ability to express my national identity, political beliefs, and advocate for my community at Cambridge University. The proposed injunction targets activism in solidarity with Palestine. The injunction would directly impede my ability to participate in campus discussions and activities related to Palestine. The requirement to seek consent for actions, even those near designated sites, could be applied in a way that limits my freedom to engage in solidarity actions that I believe are ethically and politically crucial.
14. Furthermore, as someone whose research touches on related themes, the injunction could also hinder my ability to conduct research and engage with students and colleagues on the topic of Palestine in an open and unrestricted manner, as it is not clear what would or would

not be permitted by the University. The climate created by such an injunction could lead to censorship and a reluctance to address these issues for fear of repercussions.

15. In conclusion, I believe the injunction and its practical application would disproportionately target and silence Palestinian voices and those in solidarity with them, including my own.

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:

Dated: 14 March 2025

First Witness Statement of Bassil Alaeddin
Intervener
14 March 2025

Claim No: KB-2025-000497

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BETWEEN:**

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

- and -

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

Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

FIRST WITNESS STATEMENT OF BASSIL ALAEDDIN

I, Bassil Alaeddin, of Trinity College, Cambridge, CB2 1TQ, will say as follows:

1. I am a postgraduate student at Cambridge University as of October 2024. Previously I was an undergraduate student at Cambridge University, matriculating in October 2020.
2. I have regularly attended protests and rallies for Palestine during my time at the University throughout the past 4 years including protests and rallies outside Senate House, Senate House Yard and Old Schools.
3. I have not had experience seeking consent for protest actions on campus for Palestine actions or other Palestine activities; I am unaware if there is such a process at the University.
4. I have not had experience with the Freedom of Speech code being applied by the University until this recent injunction which threatens the right and freedom of protests at the University for Palestine specifically.
5. If the injunction goes through it will significantly hinder not only the ability of members of the University from protesting for Palestine but also the wider public which has regularly used the periphery of some of the sites named in the injunction as a common congregation point to organise protests.
6. As a person of Palestinian heritage these measures are discriminatory as they are solely directed again those protesting for Palestine. If passed these measures will make Palestinians at the University and the wider community feel targeted and demeaned by the institution. This injunction will likely result in further draconian measures being employed by the University to silence more Palestine actions and activities, and risks setting a precedent to restricting advocates of other causes and campaigns in the future.
7. As a Palestinian, I feel it is integral to protest against the complicity of the University I am a student at as they have investments in arms companies which enable the genocide of my homeland. An injunction like this leaves me more exposed because of my identity and those of my fellow Palestinians on campus. Therefore, I feel that a chilling effect that the injunction would have on the Palestinian movement in Cambridge would be even more severe on Palestinians.
8. I would also be worried about how people would interpret the injunction and how it would be implemented by the University against Palestinians on campus and others who want to show solidarity for Palestine. The area that the University is looking to injunct is a symbolic setting within Cambridge that represents the University and is a focal and historic point for demonstrating against the University. The injunction also feeds into a wider picture of

repression on campuses across the UK, USA that is very worrying to Palestinians internationally.

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: 

Dated: 14 March 2025

First Witness Statement of Elleni Eshete
Intervener
EE1-EE7
14 March 2025

Claim No: KB-2025-000497

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BETWEEN:

THE CHANCELLOR, MASTERS AND SCHOLARS OF THE UNIVERSITY OF
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CAMBRIDGE, CB2 1TA

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

Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

FIRST WITNESS STATEMENT OF ELLENI ESHETE

I, Elleni Eshete, of Mill Road, Cambridge, will say as follows:

1. I am a recent graduate of the University of Cambridge after having been a student between October of 2023 and July of 2024. Since graduating, I have spent the last year

and a half as a democratically elected representative of current University of Cambridge students under the remit of Welfare and Community.

2. I would like to say first and foremost that the Cambridge SU opposes the injunction, which unfairly targets a student movement engaged in legitimate political expression (**Exhibit EE1**).
3. The University's protest approval process is inconsistent and unclear. Although the University's Freedom of Speech Code of Practice (**Exhibit EE2**) does state in its Annex at A3 that "Permission is required for meetings and events to be held on University premises, whether indoors or outdoors", it is my experience as both a former student and SU officer, that this is not routinely the practice of the University or understood by students, aside from a general need to book rooms for events and activities.
4. Students advocating for Palestine are therefore facing unnecessary additional bureaucracy and are being singled out by the injunction. To my knowledge, student protests have generally proceeded without prior University approval. Recently the Veterinarian School held a protest rally outside Senate House on the 4th of March 2025. According to the lead organiser, James Clark, who I spoke to, this happened without consent being specifically sought from the university and which successfully platformed student and staff concerns.
5. Similarly, Pro-Palestine protests occurred predictably every other Saturday throughout 2024, most times located on Kings Parade, without ever having asked for consent. As far as I am aware, no member of university staff had informed any of our students of any need for pre-authorization for these predictable and organized protests. It is clear to me and my colleagues in the Student Union, to the best of our knowledge, that students and grassroots movements organizing protests do not customarily ask for consent to protest and the need to do so has not been enforced by the University previously. It seems that there is no real requirement for students to request consent for protest actions.
6. Additionally, when I have asked student organizers about the authorization of their protest activities, the response has consistently been one of bewilderment. This highlights the absurdity of requiring students who are protesting *about* the university to first gain explicit consent *from* the university.
7. Instances where any kind of consent has been sought to organize a protest has typically been done, as far as I am aware, because it is being led by a registered and established

organization rather than by grassroots student groups. As far as I am aware, even in these cases, consent is typically requested with the city council and not the university. This is because public events typically have a fee and/or consent process for the City Council. For instance, the Reclaim the Night protest in front of Great St. Mary Church on 6 March 2025 was organized by the SU and took place without university approval. However, the SU did seek consent from the City Council and police.

8. I believe Cambridge University and College Union (UCU) follow similar formal procedures for public events for similar reasons. For example, on 20 April 2023, the marking and assessment boycott marches required formal road closures through consent by the City Council. The police were alerted and could provide on-site law enforcement security. The university was only informed that the boycott would happen. According to UCU, they did not require nor ask for consent from the university and it would be impossible to carry out the boycott protest if it had required it.
9. On the other hand, where necessary and typical, such as to book out a space within a college, our students have followed the process for this. The University has also repeatedly permitted, and supported student-led Palestine Society (Pal-Soc) events through funding, staff participation, and venue access. The Pal-Soc lecture on Friday, December 6th 2024, in Keynes Hall was in fact sponsored by *Kings in the Middle East*, a conversational series funded by the King's Research Committee. The November 1st 2024 Cambridge book launch of Edward Said's *The Question of Palestine* at Lady Mitchell Hall was hosted with university faculty members. All UCU divestment assemblies were also all booked through official booker systems. Our students are clearly reasonable, systemic and open to using typical avenues of consent and dialogue, despite the distress and urgency they demonstrably feel about the situation in Gaza.
10. During the initial high court proceedings on 27 February 2025, Counsel for the University said at one point that the student protests' "*sole* purpose is to cause maximum disruptions" although he later retracted that a bit. The SU has a policy *SU Support for the Cambridge Liberated Zones Demands (Exhibit EE3)*, in which the SU emphasizes that student's main goals are not solely to disrupt but to specifically voice their clear demands through protest in order to:
 - 10.1. *Acknowledge and condemn the crisis in Palestine in accordance with international law.*

- 10.2. *Ensure fair representation in discussions about divestment and University policy through an inclusive task force.*
- 10.3. *Conduct an immediate review and disclosure of the University's investments in companies financially and professionally complicit in the ongoing crisis in Palestine including weapons production.*
11. The majority of protest action during and since the encampment, including teach-ins and community kitchens, have been entirely peaceful and enriching. The four named sites have remained accessible for the majority of the time. While demonstrations may have slowed movement at times, they have not caused meaningful obstruction or disruption during the majority of protest action except on the three occasions of the graduation ceremonies where the location of the ceremonies were moved to avoid potential disruption and the occupation of Greenwich House. No graduations however were cancelled and the recent rally on 1 March 2025 outside Great St Mary's, attended by a large number of students, also proceeded without any disruption to the graduation ceremony. The students' main goal is not solely to cause disruption, but mainly to be heard, understood and respected in terms of their stated demands and to ensure the University lives up to its promises in working towards meeting those demands.
12. Even during the short encampments on Senate House Yard, the Yard would still have been accessible to others as needed, although outside of graduations there is not much call for people to be on the site.
13. I want to also emphasise that Senate House is a central and important location to all kinds of protests and demonstrations in Cambridge. I am concerned about an injunction that also seeks to extend to blocking or preventing access to the Senate House Yard and Old Schools. If this were the case even vigils would be affected. There have been a number of vigils for Palestine in the last few years (**Exhibits EE4 and EE5**) and for a number of other causes, including vigils for Ukraine in the same location (**Exhibit EE6 and EE7**). Under my understanding these events would be prohibited under the planned injunction.
14. Protests at graduation are not erratic, unpredictable and random protests. It is abundantly clear and stated that students only protest at graduation as a last resort when the university does not show a willingness for open dialogue with student activists. For instance, one of the three 'disrupted' graduations on the 18th May, was moved to Downing College despite no protestors being at Senate House on the day. The students

promptly and peacefully left the Senate House in an orderly fashion after an agreement to organize a meeting with them with a set time and place was reached late in the evening, the day before, on the 17th May 2024. This request was simple, reasonable and should have been easy to arrange well in advance to avoid moving the ceremony due to protests. It was down to the University that no agreement was made with the students until the night before and the graduation would not have had to be moved if the engagement had come earlier. I believe if the university is to call itself a democratic institution, students should have the expectation that their voices and concerns will be heard.

15. Students have consistently demonstrated a commitment to constructive dialogue along with staff who support student voices. Notably, the encampment at King's Parade during the summer of 2024 was publicly supported by Kings College, whose lawn the encampment was on and who did not request to remove the students. Following an agreement to establish an active working group for dialogue with the University, the encampment was peacefully dismantled, and the site left in a tidy and orderly fashion.
16. However, the University's commitment to dialogue was undermined when the University later breached the terms of agreements for this working group. The chronology of this engagement and disengagement from the University is set out in the *SU Support for the Cambridge Liberated Zones Demands* document (**Exhibit EE3**). Additionally, since the injunction, the university has not proposed any alternative measures to allow protests to proceed peacefully in key sites while minimizing disruptions to graduation ceremonies. From the students' perspective, the purpose of protesting to get their voices heard is more relevant than ever when the university seems to be taking active steps to silence and suppress their voices by leveraging legal and political measures.
17. As an elected representative of students, I, alongside my colleagues in the Student Union, have provided advocacy and welfare support to impacted students from Palestine and advised protesters on their rights, namely the Right to assemble and express themselves. When offering support, we have found that every single protester, whilst upset and alarmed at the circumstances of the world, have been polite, respectful, and keen to engage in meaningful, action-based conversations to ensure that the university is not complicit in human rights violations linked to the ongoing crisis in Palestine.

18. The purpose and demands of the students are clear, reasonable, and consistent. Our students want a university who does not simply talk and write about being ethical but conducts itself ethically in actuality.
19. If there is to be selective application of the University's Freedom of Speech Code of Practice (**Exhibit EE2**) requiring permission for Palestine protests and with a risk of contempt of court if not followed, when this has not until now been required from student groups in practice, this raises serious concerns about bias. If granted, this injunction would have a chilling effect on student activism—not just for Palestine solidarity but for any cause challenging injustice. Cambridge has a proud history of student-led change. I would urge the University to withdraw its request and engage in meaningful dialogue rather than silencing voices through legal measures.

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: Elleni Eshete



Dated: 14/03/2025

First Witness Statement of Elleni Eshete
Intervener
EE1
14 March 2025

Claim No: KB-2025-000497

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

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Intervener

EXHIBIT "EE1"

source: <https://www.cambridgesu.co.uk/news/article/cambridgesu/Cambridge-SU-Opposes-University-Injunction-Proceedings/>
accessed: 14.03.2025



ALL NEWS

CAMBRIDGE SU OPPOSES UNIVERSITY INJUNCTION PROCEEDINGS

CAMBRIDGE SU

Featured news

“The right to protest is not a privilege—it is a fundamental right, and it must be defended”

We strongly oppose the University of Cambridge’s application for an injunction that threatens students’ fundamental rights to protest, freedom of expression, and freedom of assembly. This legal move undermines the ability of students and staff to campaign on important issues and sets a troubling precedent for suppressing dissent within our academic community.

The University’s attempt to secure a sweeping injunction until 2030 is deeply alarming, particularly as it specifically targets protests related to the Palestine-Israel conflict. Such a measure is inherently discriminatory and disproportionately affects Palestinian and pro-Palestinian students and staff, which will have a ripple effect on other marginalised and protected communities. This raises serious concerns about institutional bias and the erosion of democratic rights within the University.

Additionally, it restricts the ability of future students to engage in peaceful activism without fear of severe legal consequences. The right to assemble, protest, and hold institutions accountable is a cornerstone of academic freedom. Suppressing this right risks eroding the very principles of open discourse and critical inquiry that universities should uphold.

If granted, this injunction would create a chilling effect on student activism, discouraging individuals from engaging in legitimate political expression and advocacy. The sweeping terms of the injunction, particularly the prohibition on any action that might ‘block, prevent, slow down, obstruct or otherwise interfere with the access’ extend beyond University property and risk criminalising peaceful demonstrations in surrounding public spaces. This could mean that even standing outside Senate House to hand in a petition or holding a sign on a nearby street could be deemed unlawful. Additionally, the restriction on entering, occupying, or remaining on University land for protest, along with the explicit ban on any structures such as tents, severely curtails students’ ability to engage in a long-term protest and dissent. It is unacceptable that students who seek to challenge injustice should face threats of legal action, financial penalties, or even imprisonment simply for participating in peaceful demonstrations at visible locations. Universities should foster debate, not stifle it through repressive measures that criminalise peaceful assembly.

We urge the University to withdraw this application and reaffirm its commitment to protecting the rights of students and staff. The governance of a world-leading institution should not be driven by fear and control but by the principles of free expression and intellectual freedom. The right to protest is not a privilege—it is a fundamental right, and it must be defended.

We fully endorse the open letter to the Vice-Chancellor and encourage all members of the University community to add their support.

Sign the open letter here:

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

OTHER NEWS



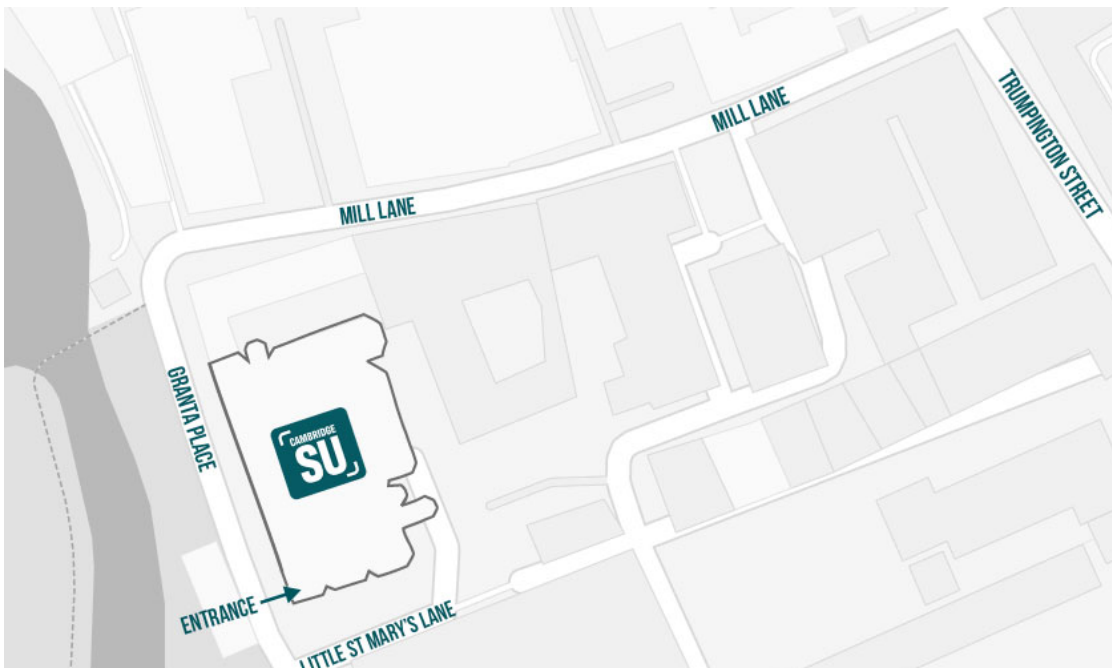
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First Witness Statement of Elleni Eshete
Intervener
EE2
14 March 2025

Claim No: KB-2025-000497

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
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

EXHIBIT "EE2"

Explanatory note (this does not form part of the Code)

Please note that this Code of Practice applies with effect from 1 August 2024 despite a UK Government decision in July 2024 to stop further commencement of the Higher Education (Freedom of Speech) Act 2023 and subsequent announcements in January 2025 about its planned amendment. Footnotes have been added to this published version of the Code of Practice to clarify some factual points arising from this. For more information, see the University's overview page on this topic.

University of Cambridge Code of Practice on Freedom of Speech

1. Introduction

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

1.2 This Code of Practice sets out the University's commitment to freedom of speech, outlines the various legislative frameworks under which such freedoms must be upheld and may be circumscribed, and summarises the procedures used by the University to manage these issues.

2. Scope

2.1 This Code of Practice applies to:

2.1.1 all members, staff and students of the University; and

2.1.2 visiting speakers and all other persons invited or otherwise lawfully participating in University activities on University premises.

2.2 For the avoidance of doubt, this Code of Practice does not apply to purely commercial meetings or events on University premises.

2.3 References in this Code of Practice to 'University premises' means those premises over which the University of Cambridge exercises control, whether indoor or outdoor.

2.4 Cambridge Students' Union, and separately each Cambridge College, has its own duty to secure freedom of speech within the law and has issued its own Code of Practice on this topic.¹

3. Key Concepts and Legislative Framework

3.1 Freedom of speech means the freedom, within the law, to receive and impart ideas, opinions or information by means of speech, writing or images (including in electronic form) without interference.

3.2 Academic freedom, in relation to academic staff at the University, means their freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without loss of their jobs or privileges at the University, or the likelihood of their securing promotion or different jobs at the University being reduced.

3.3 These concepts are underpinned by the Human Rights Act 1998, which brings the European Convention on Human Rights into direct effect in national law. Article 10 of the Convention articulates freedom of expression as a human right and sets out the limited circumstances in which that right might be circumscribed (such as to protect public safety, for the prevention of disorder or crime, or for the protection of the reputation or rights of others). These concepts also exist within other UK legislation. Universities in England have duties under the Higher Education and Research Act 2017 (as amended by the Higher Education (Freedom of Speech) Act 2023) to take such steps as are reasonably practicable to secure and promote freedom of speech and academic freedom within the law for staff and students and for visiting speakers.²

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

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

3.6 There are other legislative requirements that may be relevant in particular cases, such as offences under the Terrorism Acts if speech encourages terrorism, or amounts to the incitement of religious or racial hatred or hatred on the grounds of sexual orientation under

the Public Order Acts, as well as statutory requirements relating to the holding of processions and assemblies. The University is not under any obligation to secure or promote freedom of speech that contravenes any legislative requirements.

4. Values

4.1 The University's core values are 'freedom of thought and expression' and 'freedom from discrimination' and it encourages its staff, students and visitors to engage in robust, challenging, evidence-based and civil debate as a core part of academic enquiry and wider University activity, even if they find the viewpoints expressed to be disagreeable, unwelcome or distasteful. The steps the University takes to embed its values in practice are set out in Section 5 below.

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

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

5. Steps the University takes to ensure Freedom of Speech and Academic Freedom

5.1 The University will ensure that its teaching, curriculum, policies and procedures reflect its duties to ensure, so far as is reasonably practicable, freedom of speech and academic freedom within the law and the very high level of protection for the lawful expression of viewpoints and for speech in an academic context, including but not limited to:

- (a) its processes for programme development and approval, quality assurance and academic assessment;
- (b) its processes for admission, appointment, reappointment and promotion;
- (c) its policies relating to equality, diversity and inclusion (including the public sector equality duty) and the Prevent duty;
- (d) its processes for facilitating research; and₃

(e) its codes of conduct and other behaviour policies, which will ensure no individual will be subjected to disciplinary sanction or other less favourable treatment by or on behalf of the University because of the lawful exercise of freedom of speech or academic freedom.

5.2 The University does not enter into non disclosure agreements related to complaints about sexual misconduct, bullying or harassment.

5.3 The University has processes in place to identify and manage any risks to freedom of speech or academic freedom arising from the terms of certain overseas funding, including funding from endowments, gifts, donations, research grants and contracts, and educational or commercial partnerships.

5.4 The University shall:

5.4.1 ensure that this Code of Practice is brought to the attention of new students at registration and new staff during induction;

5.4.2 draw the attention of students and staff to this Code of Practice annually, and ensure that it is referred to in other University documentation as appropriate;

5.4.3 ensure that all relevant staff are aware of and/or receive appropriate training on freedom of speech and academic freedom;

5.4.4 ensure that all relevant decision-makers, in making any decision or adopting any policy that could directly or indirectly (and positively or negatively) affect freedom of speech, act compatibly with the University's free speech duties as they apply in the relevant circumstances;

5.4.5 periodically seek feedback from staff, students and other stakeholders to secure their views on whether freedom of speech and academic freedom at the institution are being adequately protected and take the responses into account;

5.4.6 ensure that there are adequate measures in place to raise concerns about freedom of speech and academic freedom;

5.4.7 ensure that when new policies and procedures are introduced consideration is given to their impact on freedom of speech and academic freedom;

5.4.8 ensure that it has appropriate processes for the holding of events and meetings as set out in section 6 below;

5.4.9 monitor any concerns that have been raised about freedom of speech and academic freedom to ensure that they are addressed so far as is reasonably practicable and to address any lessons learned and draw the attention of complainants to its processes for investigating complaints and the OfS complaint scheme as set out in section 7;³ and

5.4.10 take steps to secure compliance with this Code of Practice, including where appropriate taking disciplinary action.

6. University Events and Meetings – Procedures and Conduct of Attendees

6.1 An active speaker programme is fundamental to the academic and other activities of the University and staff and students are encouraged to invite a wide range of speakers and to engage critically but courteously with them, including as set out at paragraph 6.6 of this Code. This Code of Practice provides the only mechanism by which the University can cancel or impose conditions on University meetings or events where this action is deemed necessary as a result of the event's subject matter and/or speaker(s). This is to ensure

that the use of University premises is not inappropriately denied to any individual or body of persons on any ground connected with their beliefs or views or the policy or objectives of a body (with the exception of proscribed groups or organisations) of which they are a member. However, all speakers should anticipate that their views might be subject to robust debate, critique and challenge.

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

- 6.2.1 the views likely to be expressed by any speaker are contrary to the law;
- 6.2.2 the speaker is likely to incite breaches of the law or to intend breaches of the peace to occur;
- 6.2.3 the meeting will not permit contrary or opposing viewpoints to be held or expressed;
- 6.2.4 the speaker and/or the organisation they represent advocates or engages in violence in the furtherance of their political, religious, philosophical or other beliefs;
- 6.2.5 the views likely to be expressed by any speaker are for the promotion of any illegal organisation or purpose, including organisations listed on the government’s list of proscribed terrorist groups or organisations; or
- 6.2.6 it is in the interest of public safety, the prevention of disorder or crime, the proper functioning of the University or the protection of those persons lawfully on University premises, that the meeting does not take place.

6.3 The lawful expression of controversial or unpopular views will not in itself constitute reasonable grounds for withholding permission for a University meeting or event.

6.4 Where the University is reasonably satisfied that the otherwise lawful expression of views at an event or meeting on University premises is likely to give rise to disorder or threats to the safety of participants or the wider University community, the University shall consider what steps it is necessary to take to ensure the safety of all persons and the security of University premises. These may include, but are not limited to: requirements as to the provision of security/stewards, the speaker being part of a panel, ensuring that a member of staff is in attendance, or that the event or meeting should take place in alternative premises, at a later date, or in a different format. The University may impose such conditions and requirements upon the organisers as are reasonably necessary in all the circumstances, ensuring that the conditions and requirements go no further than is necessary to address the risks it has identified. The University will only pass on the costs of security for using the premises to those arranging the relevant event or meeting in exceptional circumstances, such as where the costs are wholly disproportionate to the numbers likely to be attending the event and the event could be held in a more proportionate way, or where the visiting speaker could reasonably be expected to have their own security because of the political or state office they hold. Any request to a meeting or event organiser to pay security costs in exceptional circumstances will be in writing and will explain those costs and any appeal mechanism. Any request to pa

security costs will not be influenced to any degree by the ideas or opinions of any individual involved in organising the event or meeting, or by the policy or objectives of, or the views of any of the members of, any body involved in organising the event or meeting.

6.5 These narrow exceptions to the general principle of freedom of speech are not intended ever to apply in a way that is inconsistent with the University's commitment to the completely free and open discussion of ideas.

6.6 Those attending events and meetings at the University are expected to conduct themselves in a manner consistent with the following principles:

6.6.1 everyone has the right to free speech within the law.

6.6.2 the aim of events at the University is to expose members, staff and students to the widest possible range of views, within the law.

6.6.3 protest is itself a legitimate expression of freedom of speech but protesters should recognise the rights of others participating in the event or meeting, and in particular not violate the rights of others to speak during the event. Protest must not shut down debate.

6.7 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, except where the event or meeting is purely commercial.

7. Breaches and Complaints

7.1 Where the University receives a concern about the exercise of academic freedom or freedom of speech or where it has received a concern about a possible infringement or departure(s) from the values and procedures set out in this Code of Practice, it will consider which of its procedures are most appropriate to consider the concern, making such enquiries and seeking such information as it considers necessary. Such consideration may lead to further investigation in accordance with the University's disciplinary procedures (staff or student), or the University's grievance or complaints procedures.

7.2 The Office for Students (OfS) operates a free speech complaints scheme. Under that scheme, the OfS can review complaints about free speech from members, students, staff, applicants for academic posts and (actual or invited) visiting speakers. Information about the complaints that the OfS can review is available on its website.⁴

8. Monitoring and Review

8.1 The University's Committee on Prevent and Freedom of Speech will periodically review the contents and operation of this Code of Practice and report on its operation and recommend amendments to it for consideration by the Council and the General Board as appropriate or necessary.

8.2 The point of contact for any query about this Code of Practice and its Annex is the Secretary to the Committee on Prevent and Freedom of Speech at freespeech@admin.cam.ac.uk.

Annex: Processes for meetings and events on University premise

A1. This Annex is issued under paragraph 6.7 of the University's Code of Practice on Freedom of Speech, which reads: '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, except where the event or meeting is purely commercial.'

Organisation and approval of meetings and events on University premises

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

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

A4. It is anticipated that, in the vast majority of cases, the authority in question will straightforwardly consider the request as part of normal business.

A5. However, in the exceptional circumstances that the authority in question considers that the holding of the meeting or event might reasonably be refused on any of the grounds set out at paragraph 6.2 of the University's Code of Practice on Freedom of Speech, there is a process of escalation to a Referral Group (referralconfidential@admin.cam.ac.uk). (Membership of the Referral Group is approved by the Council and the General Board on the recommendation of the Committee on Prevent and Freedom of Speech.) Only the Referral Group may refuse permission in this way and on these bases. The request should be forwarded to the Referral Group with a statement of the concerns. This referral should be made at least seven working days in advance of the proposed meeting or event. Members of the University who are concerned that a particular forthcoming meeting or event should be escalated to the Referral Group may do so directly. The Referral Group will, in consultation as necessary, determine whether the meeting or event can go ahead as originally planned, or should be subject to reasonable conditions such as those set out in paragraph 6.4 of the Code of Practice on Freedom of Speech. Only in exceptional circumstances, when there are risks which cannot be mitigated or the event organiser refuses to meet any conditions imposed, will permission be withheld.

A6. Any decision by the Referral Group (including one upheld on appeal) that a meeting or event should not take place, or may only take place subject to conditions, is binding and takes precedence over any other decision which may have been taken by any other body

or officer in the University, subject to the right of appeal set out below.

A7. An organiser who is unhappy with the Referral Group's decision has the right of appeal to the Vice-Chancellor's deputy appointed for this purpose.

Management of meetings and events on University premises

A8. Once approved, the organisers of meetings and events must comply with any conditions set by the University authorities concerned. Such conditions may include the requirement that tickets should be issued, that an adequate number of stewards or security staff should be available, that the Proctors and/or University Security and/or the Police should be consulted and their advice taken about the arrangements, and that the time and/or place of the meeting should be changed. The cost of meeting the conditions, apart from security costs, and the responsibility for fulfilling them, rests with the organisers. Security costs will be borne by the University other than in exceptional circumstances, as set out in paragraph 6.4 of the Code of Practice on Freedom of Speech.

The Proctors

A9. In addition to seeking the permission referred to above, the organisers of any meeting or event to be held on University premises (especially one which is to be addressed or attended by persons who are not resident members of the University) which the organisers believe might attract significant protest and at which lawful free speech might be compromised should consult the Proctors at the earliest opportunity and ideally at least seven working days in advance via contact@proctors.cam.ac.uk.

A10. The organisers of any meeting or event must comply with any lawful and reasonable instructions given by a Proctor or other University officer, or by any other person authorised to act on behalf of the University, in the proper discharge of their duties.

Colleges

A11. Members of the University are reminded that University disciplinary regulations apply on College premises and that a College may invite the Proctors to enter its premises.

Footnotes (these do not form part of the Code)

¹ The statutory requirement for Cambridge Students' Union and each Cambridge College to have issued a Code of Practice on Freedom of Speech is not in force. Nonetheless, many Colleges have issued a Code of Practice and/or comparable documentation.

² The amendments to the Higher Education and Research Act 2017 effected by the Higher Education (Freedom of Speech) Act 2023 are not in force. As such, the applicable statutory duty (in section 43 of the Education (No. 2) Act 1986) is for universities to take such steps as are reasonably practicable to secure freedom of speech within the law for staff and students and for visiting speakers.

³ The OfS complaints scheme is not operational.

⁴ The OfS complaints scheme is not operational and there is no information about it on the OfS website.

First Witness Statement of Elleni Eshete
Intervener
EE3
14 March 2025

Claim No: KB-2025-000497

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BETWEEN:

THE CHANCELLOR, MASTERS AND SCHOLARS OF THE UNIVERSITY OF
CAMBRIDGE

Claimant

- and -

PERSONS UNKNOWN WHO, IN CONNECTION WITH CAMBRIDGE FOR
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(I) ENTER OCCUPY OR REMAIN UPON

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Defendants

- and -

EUROPEAN LEGAL SUPPORT CENTRE

Intervener

EXHIBIT "EE3"

source: <https://www.cambridgesu.co.uk/news/article/cambridgesu/SU-Support-for-the-Cambridge-Liberated-Zones-Demands/>
accessed: 14.03.2025



ALL NEWS

SU SUPPORT FOR THE CAMBRIDGE LIBERATED ZONES DEMANDS

CAMBRIDGE SU

The Cambridge SU Officer Team are working on the action motion passed at Student Council to support the Cambridge Liberated Zones.

Action Motion Resolves:

1. To produce a publically accessible document on the SU website chronologically detailing the progress of the campaign for the Cambridge 4 Palestine's (previously Cambridge Liberated Zone) demands supported by the SU.
2. This website also details the demands supported by the SU not yet addressed by the university administration.

Previous Motion (from the 2024 Extraordinary Student Members Meeting)

Resolves:

- To support the current encampment and any future encampments by allocating the remaining Council Free Budget (£1250) to sustain and support the activities of the Cambridge Liberated Zone.
- To officially recognise the encampment's demands and elected negotiation team as a legitimate representative body of the student population, ensuring they remain represented within ongoing dialogue and working groups of the University.
- To cede SU representative positions in committees discussing the University's stance on Palestine to student representatives elected through the Cambridge Liberated Zone.
- To reaffirm and actively promote Cambridge SU's commitment to supporting the Palestinian people through targeted campaigns, educational initiatives, and solidarity actions as directed by students fighting for justice in Palestine.

Breakdown of Actions from Motion:

1. Council Free Budget
 1. As was explained before, this money should be put towards a fundraiser for charities working on the ground in Palestine - the BME officer, as the person assigned this policy, will be arranging one.
2. To officially recognise the demands; and



positions and have advocated for student members from the taskforce to take them up. We advocated against the removal of these members after subsequent encampments, and advocated for their reinstatement when that decision came before Council.

2. In every space in which we sit, where it becomes relevant, we advocate for the University to disclose its financial and professional ties with any complicit organisations, divest funds and collaboration away from any such organisations, reinvest in Palestinian students, academics and scholars, and protect students at risk.
4. To reaffirm and actively promote Cambridge SU commitment to supporting the Palestinian people through targeted campaigns, educational initiatives, and solidarity actions as directed by students fighting for justice in Palestine.
 1. We welcome student direction in this matter, and the BME and Welfare and Community officers have liaised with representatives from Cambridge for Palestine.

Chronological Support Timeline - Cambridge SU and the Cambridge4Palestine (C4P) Encampment

- Summer 2024:
The Black & Minority Ethnic (BME) Officer and Welfare & Community Officer met with the student encampment to express their support for the campaign. During the meeting, the issue of storage space was raised and later discussed in a Senior Management Team (SMT) meeting. However, due to limited resources, Cambridge SU was unable to provide a permanent storage space for the Palestinian movement.
- 1 November 2024:
The Welfare & Community officer began conversations with SOS-UK about supporting the working group through Ethical Finance training for interested students to build campaigning capacity.
- 11 November 2024:
The Welfare & Community Officer confirmed ethical finance training for JMCR officers and students for the 29th of January.
- 22 November 2024:
The Kanafani House Encampment resumed following the University's failure to uphold the agreement from the negotiated settlement on Kings Encampment. Over the weekend, the BME Officer engaged in discussions with the University Pro-Vice-Chancellor and representatives from the Cambridge4Palestine (C4P) group.
- 23-24 November 2024:
The BME Officer discussed funding options for upcoming encampment-related needs. Reassurance and support were offered. The Welfare and Community Officer discussed with sabbatical officers and SU communications staff and began drafting a statement for the encampment for the SU website.
- 25 November 2024:
The BME Officer convened an urgent meeting with the sabbatical officers team and the democracy & representation team to explore collective support for the Cambridge Liberated Zone and the new encampment under SU policy. The Presidents (PG and UG) attended University Council, lobbying the University to uphold its commitment to the students and advocating against the removal of the taskforce members from the working group on arms divestment.
- 26 November 2024:



- 27 November 2024:
The Welfare & Community Officer sent the final draft to the SU communications team to be published in public support of the encampment. The BME Officer created a WhatsApp group titled "SU Supports Encampment" with the C4P representative to facilitate communication and added the Welfare & Community Officer to the group. The Senate House encampment resumed, demonstrating the first known instance of two simultaneous occupations.
- 29 November 2024:
A Statement on the Kanafani & Senate House encampments was published. The statement read as follows:

"Cambridge SU expresses its support for the aims of Cambridge for Palestine who are currently occupying Kanafani House (previously known as Greenwich House) and the Senate House.

The SU notes that the aims of the student-led occupation, beginning on 22nd of November, are to urge the University to honour its agreements made with Cambridge for Palestine. Particularly, to review its financial ties with arms manufacturers and other entities implicated in human rights violations linked to the ongoing crisis in Palestine.

As part of our student approved mandate to support Cambridge for Palestine, we request the University to take urgent accountability, honour its commitments, and engage meaningfully in constructive dialogue with the students. We stand firmly against any punitive actions taken against those exercising their right to advocate for change.

We stand behind the students' demands to:

1. *Acknowledge and condemn the crisis in Palestine in accordance with international law.*
2. *Ensure fair representation in discussions about divestment and University policy through an inclusive task force.*
3. *Conduct an immediate review and disclosure of the University's investments in companies financially and professionally complicit in the ongoing crisis in Palestine including weapons production.*

Cambridge SU is also proud to support the University and College Union (UCU) in their rally and assembly on 28th November during the National Day of Action for Palestine.

Cambridge SU believes that our educational institution should not profit from oppression and war. We will continue to work alongside students and staff to promote transparency, justice, and solidarity.

Cambridge SU also want to highlight the welfare resources available to all students affected by conflict, which can be found on our page here:

<https://www.cambridgesu.co.uk/advice/information/conflict/>

Our student advice service also offers appointments to discuss any issues which may affect you as a student. You can contact them at advice@cambridgesu.co.uk.

- 9 December 2024:
The BME Officer continued dialogue between the University administration and the encampment. The BME Officer arranged a meeting with the BME Campaign Executive Committee, advocated and secured a welfare budget of at least £100, providing essential supplies such as basic food, warmers, sleeping mats, and other necessities for those participating in the encampment.



project. The Welfare and Community Officer created graphics to demonstrate the structure of Cambridge university and colleges, - and the different stakeholders involved in financial decision making - to add to the presentation. C4P representatives also reviewed the document,

- Christmas Break 2024:
Informal discussions between the BME Officer, C4P representatives, and the University administration continued. A follow-up meeting was scheduled for early Lent term.
- 21 January 2025:
Both the BME Officer and the Welfare & Community Officer met with the C4P representative to discuss the way forward and explore strategies for continued support and advocacy.
- 27 January 2025:

The Presidents (PG and UG) advocated for reinstating the taskforce members to the working group on arms divestment.

- 29th January 2024:
The Welfare and Community Officer hosted a successful workshop evening for Divestment and Ethical (re)finance training with over 24 students present total.
- 30th January 2024:

The Welfare and Community Officer hosted follow up consultations alongside SOS-UK for students interested in 1-1 campaign support for students.

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First Witness Statement of Elleni Eshete
Intervener
EE4
14 March 2025

Claim No: KB-2025-000497

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BETWEEN:

THE CHANCELLOR, MASTERS AND SCHOLARS OF THE UNIVERSITY OF
CAMBRIDGE

Claimant

- and -

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EXHIBIT "EE4"

source: <https://www.varsity.co.uk/news/27713>

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Hundreds gather for pro-Palestine vigil

The vigil was held in honour of those killed in Israeli airstrikes on Rafah earlier this week



The crowd was the largest Cambridge has seen since the encampment began earlier this month

CHRISTOPHER LORDE WITH PERMISSION FOR VARSITY

by **Omar Burhanuddin & Francesca Morgan**
Wednesday May 29 2024, 11:45am

2 shares

Over three hundred protesters held a rally (28/05) on King's Parade in solidarity with the Cambridge for Palestine (C4P) encampment, calling on the University to divest from companies associated with Israel.

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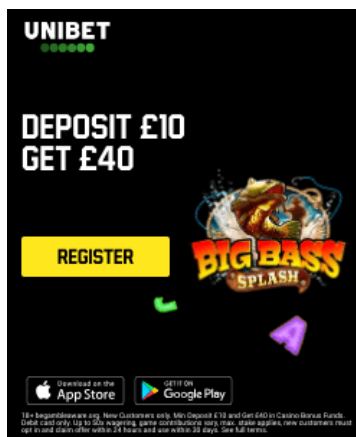
One Second Later and These Street Photos Would Be Completely Different

attacks on Rafah in memory of the dozens of Palestinians killed in Israeli [airstrikes](#) on the city on Monday (27/05) as a part of an ongoing offensive. Initial reports [stated](#) that 45 people were killed in the strikes.

The airstrikes hit camps that had been set up for displaced people in Rafah by the UN. The assault has triggered international [condemnation](#), including from the French President, the German Vice-Chancellor, and the International Court of Justice.

Benjamin Netanyahu, the Prime Minister of Israel, [called](#) the strikes a “tragedy”.

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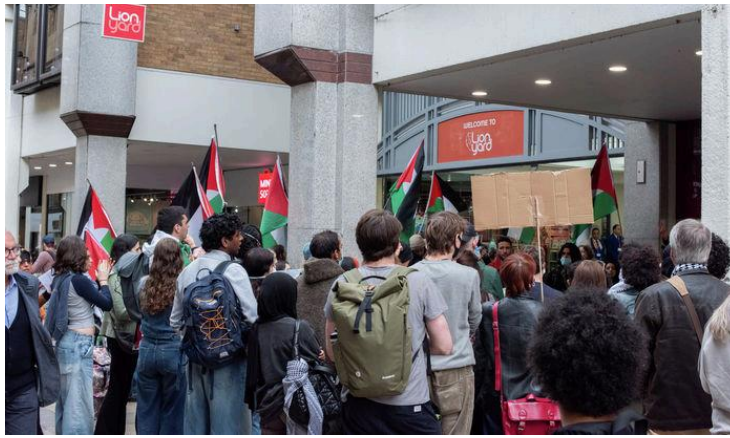


During the vigil participants wrote the names of dead Palestinians onto banners, and carried an “all eyes on Rafah” banner in condemnation of the attacks. The vigil was held in silence, with protesters at the rally commenting on the “sombre mood” at the camp following attacks on Rafah.

These demonstrations come as negotiations continue between C4P and the University over their demands for Divestment from Israel. No progress has been announced by either party.

The C4P [encampment](#) has been in place outside King’s College since the beginning of this month. Last week, students set up a second camp outside Senate House, which was [dismantled](#) days later when the University agreed to meet with student representatives.

[READ MORE](#)



Workers stage walkout in solidarity with pro-Palestine encampment

C4P is demanding that the University disclose its holdings in companies involved in Israel’s military operations in Gaza, and divest from such institutions.

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The Israeli offensive in Gaza has also been condemned by college JCRs, with the Trinity College Student Union (TCSU) releasing a statement expressing “solidarity with the people of Palestine” and calling for an “immediate and permanent ceasefire,” yesterday.

TCSU also confirmed **reports** that Trinity plans to divest from all arms companies, including “those complicit in the violence and bombing happening in Gaza,” claiming that the decision had been communicated to the TCSU committee by “members of the college”.

A spokesperson from Trinity College told *Varsity*: “Trinity College continues to review its investments regularly.”

The University of Cambridge has been contacted for comment.

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Claim No: KB-2025-000497

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EXHIBIT "EE5"

source: <https://www.varsity.co.uk/news/28287>
accessed: 14.03.2025

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Pro-Palestinian students stage counterprotest at vigil for peace

The vigil was attended by pro-vice chancellor Bhaskar Vira



The vigil was attended by the University's pro-vice chancellor for education Professor Bhaskar Vira
AMI KHAWAJA FOR VARSITY

by **Wilf Vall**
Monday October 7 2024, 1:29pm

6 shares

Pro-Palestinian students staged a counterprotest at the 'silence vigil for peace' last night, calling on the University to cut ties with arms companies.

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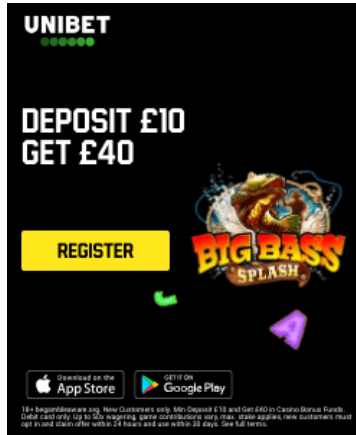
ThePDFOneStart

Activists from Cambridge for Palestine (C4P) displayed banners accusing the University of "hypocrisy" over their investments in

largest science contractor in Europe.

The group also displayed QR codes that linked to a site displaying their demands on the University to divest from companies associated with Israel.

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The vigil, which was described as a place for “a moment of reflection and prayer among others,” was attended by the University’s pro-vice chancellor for education Professor Bhaskar Vira.

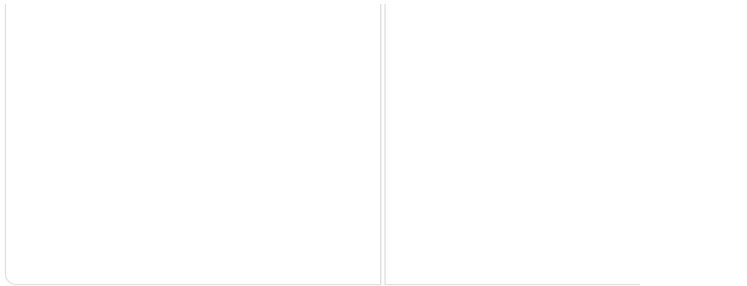
The protesters remained silent throughout the vigil, and did not attempt to disrupt the event while it was ongoing.



The protesters remained silent throughout the vigil
AMI KHAWAJA FOR VARSITY

During the event, one onlooker, who was not associated with the counterprotest, played loud music to disrupt the vigil. They were repeatedly asked to turn it off, but refused, stating that: “I don’t like being told to shut up by people who are verbally abusive most of the time and stay quiet when they should speak up”.

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This disruption comes after the University agreed to review their investments in arms companies, following over a month of pressure from the Cambridge for Palestine (C4P) encampment.

The encampment was first set up outside King's College by C4P in May, calling on the University to disclose its holdings in companies associated with Israel, and to subsequently divest from them.



Cambridge offers to review investments following pressure from pro-Palestine encampment

The encampment closed following an agreement with the University to establish a working group with a student-led taskforce to review arms investments. The review was planned to take place “rapidly during Michaelmas Term 2024 [...] with the aim of arriving at initial positions by the end of the term”.

Professor Vira was at the forefront of the University’s response to the Cambridge for Palestine’s encampment, leading discussions with the group along with pro-vice chancellor for University community and engagement Professor Kamal Munir.

The University of Cambridge has been contacted for comment.

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14 March 2025

Claim No: KB-2025-000497

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EXHIBIT "EE6"

Source: <https://www.varsity.co.uk/news/23305>
Accessed: 14.03.2025

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Hundreds gather for Ukraine vigil at Senate House

Speeches were given as Cambridge students and resident assembled to demonstrate their support for Ukraine as it faces Russia's invasion



People gathered under a projection of the Ukrainian flag outside the Senate House
ELLA SHATTOCK

by **Ella Shattock**

🚫 This article is **3 years old**

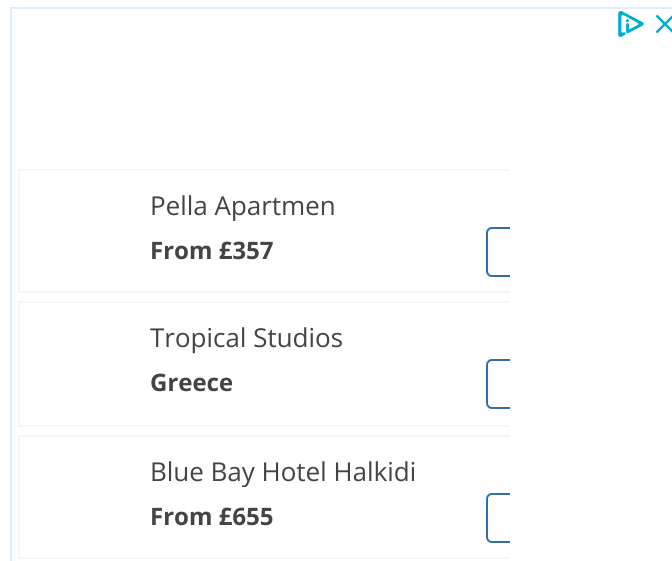
Friday March 4 2022, 1:14pm

29 shares

1316

(5/5), in solidarity with all those affected by the Russian invasion of Ukraine.

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The advertisement is a rectangular box with a light blue border. At the top right corner, there is a small blue play button icon and a close 'X' icon. The main content of the ad is a list of three accommodation options, each in a white box with a thin border. The first option is 'Pella Apartmen' with the price 'From £357'. The second option is 'Tropical Studios' with the location 'Greece'. The third option is 'Blue Bay Hotel Halkidi' with the price 'From £655'. To the right of each option is a blue square icon with a white bracket-like shape.

A Ukrainian flag was projected onto Senate House, and “#StandWithUkraine” was cast in white lettering on King’s College chapel. The chapel was also lit in yellow and blue to show support.

Students and university members stood draped in Ukrainian flags, while others wore blue and yellow clothing and ribbons. Some held cardboard signs reading “Welcome Ukrainian Refugees” and “No War”. A man at the front kept a single sunflower, the national flower of Ukraine, held above his head.

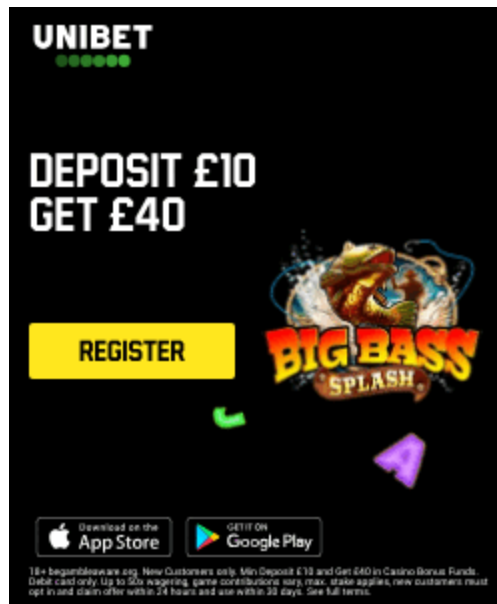
One student, who has spent the past week organising for the transport of bulletproof vests to Ukraine, told a group on King’s Parade that his grandmother is now safe in Poland. She apologised on the phone, he said, for being unable to knit him mittens this year. Her sewing kit was left behind in Kyiv.

Stephen Toope, the Vice Chancellor, gave some opening remark at the vigil, signalling the University’s backing for the UN’s demands that Russia “immediately, completely, and unconditionally withdraw all of its military forces from the territory of Ukraine.” He also introduced two speakers, the

UKRAINIAN STUDIES PhD student at Fitzwilliam College, Stephen Blinder.

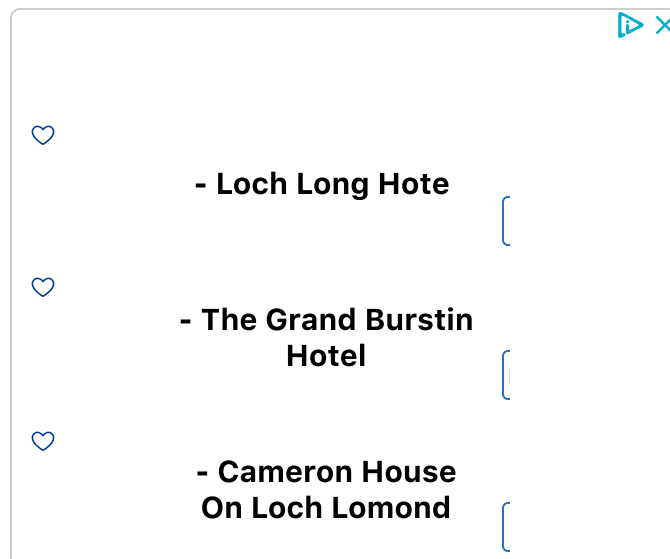
Smytsniuk spoke first, emphasising the devastation, fear, and anger felt by “Ukrainians all over the world” about a war that “seems so far, far, far away, but yet is so close”.

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He went on to admire the bravery of the citizens of Ukraine, saying: “They are risking getting killed, or are getting killed, a this very moment. And I am not there. I am here.”

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there. It is empty. I look around, and I don't find myself in a bomb shelter. I wish I knew how my friends were feeling, but it's impossible to understand.”

Smytsniuk closed his speech with a message concerning the Ukrainian President, former actor and comedian Volodymyr Zelensky. “As they say in former Soviet states,” he said, alluding to the power of political satire, “it wasn't the Americans who made sure that the Soviet Union collapsed, [...] those were the comedians.”



Students in Russia ‘must’ return as Toope condemns invasion of Ukraine

“And luckily, there is a comedian in Kyiv, which I am very much hoping will protect Ukraine – but I don't know.”

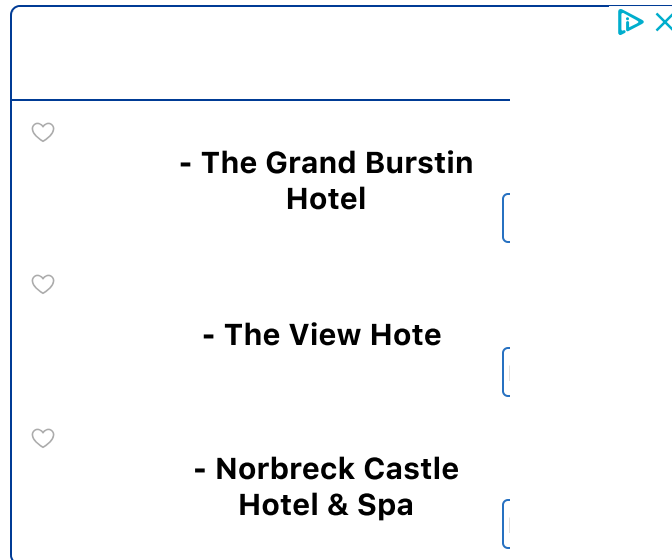
Next to speak was a Ukrainian PhD student, Stepan Blinder, who praised the University for its Ukrainian Studies programme which has been permanently established since 2010.

Blinder called this “something extraordinary”, saying that: “Cambridge is the university that provides people with an inclusive understanding of Eastern Europe.”

example of other American and Western European academic institutions by opening up short and long-term research residences for established Ukrainian scholars.

After a time for silent contemplation, the evening ended around 7:15pm with a moving choral recording of “Prayer for Ukraine”, the patriotic hymn that is considered Ukraine’s spiritual anthem

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The advertisement is presented in a window-like format with a blue border and a close button in the top right corner. It lists three accommodation options, each with a heart icon on the left and a bracket on the right:

- The Grand Burstin Hotel
- The View Hote
- Norbreck Castle Hotel & Spa

Cambridge University Ukrainian Society (CUUS) plans to hold a march on Saturday morning (05/03), walking from outside Sidgwick Site to Castle Mound in solidarity with the Ukrainian soldiers and civilians who are enduring and retaliating against Russia’s invasion.

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Claim No: KB-2025-000497

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Cambridge marks one year since the invasion of Ukraine

Huge crowds gathered at King’s Parade for a candlelight vigil on Friday evening (24/2)



Crowds gathered on King’s Parade and heard speeches from local Ukrainians and politicians
BELLA SHORROCK

by **Nabiha Ahmed & Bella Shorrock**

! This article is 2 years old
Saturday February 25 2023, 8:33pm

20 shares

Large crowds of people gathered on King’s Parade yesterday evening (24/2) for a candlelit vigil to mark one year since the Russian invasion of Ukraine.

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initiative set up by Ukrainians in Cambridge. People of all ages came together for the vigil including Ukrainian families who have been displaced from their homes, students, faculty members and members of the public.

Among repeated shouts of 'Slava Ukraïni!', representatives from Cambridge4Ukraine, Cambridge MP Daniel Zeichner and the mayor of Cambridge Mark Ashton made speeches to the crowds.

Varsity spoke to some of those gathered on Kings Parade. Natalia Berloff, a fellow at Jesus College, attended the vigil with her daughter. She told *Varsity* that the Ukrainian students she knows are "struggling", but that their strength has inspired her. Berloff, who is Ukrainian but grew up in Russia, urged people to see the war as a fight "of good against evil".



One fellow at the event said that Cambridge's Ukrainian students are 'struggling'
BELLA SHORROCK

Andrii Smytsniuk, who teaches Ukrainian in the Slavonic section of the MML faculty, made a speech in which he told those gathered that the past 365 days had been "the most difficult days in the lives of Ukrainians all across the world".

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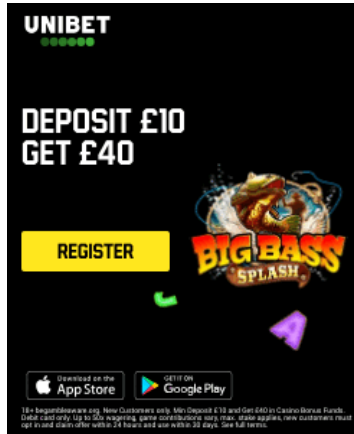
Stunning Roof Lanterns

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1324

know what to say. There is so much pain, so much grief, so much anger, but at the same time inspiration and hope.” He thanked the crowd for their support.

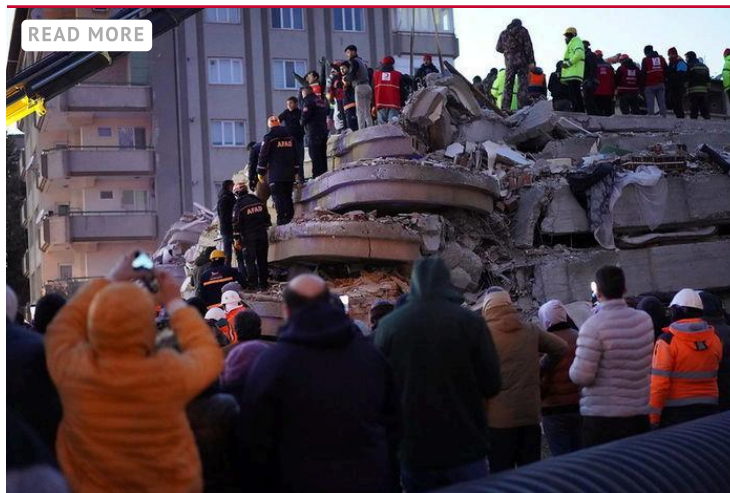
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In a later speech, a representative of Cambridge4Ukraine drew attention to the location of the vigil. “We’re in Cambridge, the centre of intellectual life in the world”, he told crowds. There was, he said, no better place to have an open discussion about the war that “didn’t start in 2022, but many years ago”.

A representative of Cambridge University’s Ukrainian Society also spoke at the vigil, saying that Ukraine is “still fighting and winning despite their huge opponent”. A year on, they said that “hope is stronger than ever” for Ukraine, and encouraged those gathered on King’s Parade to “stay honest and stay strong”.

After the vigil concluded with the singing of the Ukrainian National Anthem, *Varsity* spoke to Cambridge students who had attended.



‘Pay now or drop out’: Turkish and Syrian students react to treatment after earthquake

One student, studying Ukrainian and Russian, told *Varsity*: “It is impossible for me to separate my studies from the reality it

and our support.

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Another student, studying MML, who was in Russia for their degree at the beginning of the invasion said: “Today is a reminder of the shock I felt on that day. A year on, the war shouldn’t fade into the background.”

When asked about the University’s response to the war, the student told *Varsity* they had a “generally positive” impression. In particular, they noted the University’s efforts to **fund** academics displaced by the war. However, the student noted that they would have appreciated “more symbolic” action from the University on this day, similar to when Senate House was **lit up** with the colours of the Ukrainian flag.

A march of solidarity with Ukraine also took place today (25/02), and Great St Mary’s Church will be open in support of Ukraine on Sunday (26/02).

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