



Student Event Risk Mitigation Speech/Expression Events Audit Report

Executive Summary

Background

The University of South Carolina (University) is committed to fostering an environment where the open exchange of ideas and information is valued, promoted, and encouraged. This commitment is fundamental to ensuring civil debate and free expression, which are vital aspects of campus life.

The Division of Student Affairs and Academic Support (SAAS) provides opportunities for every student to define a unique involvement story that prepares them to lead and serve as an engaged global citizen. This undertaking includes coordinating a group of Safely Engaging in Expression Delegate (SEED) volunteers who support students in planning and hosting speech/expression events such as debates, demonstrations, marches, protests, and rallies on the Columbia campus.

Overall Conclusion

The University's policy outlining speech/expression on campus acknowledges the University's support of free expression and includes reasonable restrictions on expression. A website, Free Speech on Campus, provides information to students on how they can request assistance planning a speech/expression event. SAAS provides educational opportunities for students to learn more about speech/expression on campus.

SAAS's SEED group is comprised of staff experienced in communicating and engaging with students. Roles and responsibilities have been communicated to SEED members with members also receiving training covering constitutional, legal, legislative, and safety considerations related to expressive activity on campus. SAAS collaborates with campus partner units to evaluate and plan for potential safety concerns related to speech/expression events on campus. Improvement opportunities identified during our review are listed below.

Areas Audited

- Speech/expression policies
- Communication of speech/expression information and event planning processes
- SEED membership makeup, roles/responsibilities, and training
- Evaluation and communication of potential event safety concerns

Observations

- Opportunity to strengthen the event space request webform
- Publishing a free speech/expression syllabi statement

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Detailed Report

Objectives and Scope

Our audit procedures were developed using a risk-based approach to determine if University administration has established effective policies and procedures related to speech/expression events. In collaboration with management, we completed a risk assessment to identify potential risks. Our scope included:

- Verifying speech/expression policies are current and support speech/expression on campus.
- Assessing how information concerning speech/expression on campus is provided to students, including how students can get involved and plan a speech/expression event on campus.
- Assessing the membership makeup, roles and responsibilities, and training of SEED volunteers who assist and support students in planning and executing speech/expression events on campus.
- Verifying speech/expression events are evaluated for potential safety concerns to include communication and collaboration with campus partner units. As part of this review, we also attended a speech/expression event taking place on campus to assess event planning and management processes.

Contextual Data

Speech/expression events are an important part of a student's overall learning experience and provide a balance to academic and research pursuits. These events offer a unique and collaborative environment where students can enhance their community and civic engagement, gain an appreciation and understanding of diverse cultures and perspectives, strengthen communication and leadership skills, and prioritize health and wellness. These events also reinforce the principle that debate and deliberation should not be suppressed but rather openly and vigorously embraced.

University's Statement on Freedom of Speech

The University supports, encourages, and defends freedom of inquiry and recognizes that free speech is foundational to the work of a university. To this end, on June 23, 2023, the University's

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Board of Trustees unanimously adopted the core principles articulated in the “Report of the Committee on Freedom of Expression” at the University of Chicago highlighting the University’s commitment to the principles of free speech, expression, and inquiry that are afforded to all members of the University community.¹

Speech/Expression on Campus

There are many ways for students to exercise their speech/expression rights and the University makes resources available to any student who desires to become more engaged in issues they care about. Students are encouraged to get involved in student organizations which are comprised of students who desire to come together to support a particular view, explore a common interest, or accomplish specific tasks. Students are also encouraged to participate in local, national, and global communities to become more involved in civic engagement activities such as advocacy for community service or voting. Lastly, students are encouraged to host events on campus, including speech/expression events involving guest speakers or organized demonstrations and protests.

Speech/Expression Event Risks

As is the case with any event on campus, speech/expression events come with risks. Mitigating these risks is critical to ensuring the health and safety of attendees and campus community members while simultaneously minimizing potential liability to the University. While speech/expression event risks vary, they typically center around the following common themes:

Emotional

- The risk of attendees or campus community members having feelings of discrimination, harassment, marginalization, or trauma due to the content or nature of an event.

Facilities

- The risk of damage to buildings, equipment, property, or the surrounding community.

Financial

- The risk of lawsuits against the University.

Operational

- The risk of disrupting academic, housing, or research activities.

Physical

- The risk of injury or death to an attendee or campus community member.

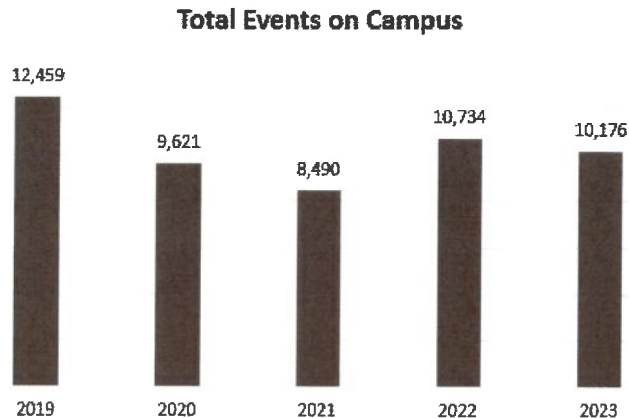
Reputational

- The risk of negative publicity for the University.

¹ Approval of University’s Statement on Freedom of Speech, Board of Trustees Meeting, 6/23/2023.

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The University hosts a multitude of informative and entertaining events each year, including speech/expression type events. For the years 2019 - 2023, the University averaged over 10,000 events per year (pandemic impacted 2020 and 2021 totals), as illustrated in the graph below.²



Observations

1) SEED Review of CSR Event Space Requests

The University's central Calendar and Space Reservation (CSR) system, 25Live, is used for scheduling academic space and non-academic events. Affiliated individuals and groups use a 25Live Event Form (webform) to request a space/location on campus while also providing event details including the event name, sponsoring organization, date/time, and expected headcount. Space event requests are routed for review to CSR Unit Space Coordinators (Coordinators) based on the requested space/location on campus. As part of the space event review process, Coordinators may assign Resources to a space event request which initiates additional reviews related to calendar publications or equipment needs.

During our review, we identified an opportunity to strengthen the existing 25Live webform by creating a SEED Resource. When selected by Coordinators, this additional resource would initiate a SEED review for speech/expressive activity type space event requests and would further help ensure SEED personnel are made aware of a speech/expressive activity type space event request regardless of the event's location on campus.

² Q3-2023 Dashboard Report, Enterprise Risk Management, Emergency Management Senior Committee. *Total events include total number of Russell House event bookings, total number of public events on campus, and total number of high-profile special events which are events of gatherings of 50,000+ or events receiving large media coverage.*

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Recommendation

The Associate Director for Russell House Events should collaborate with the program Coordinator for CSR to create a SEED resource as part of the 25Live webform and which can be selected by Coordinators as part of any speech/expressive activity type space event request. Following creation, Coordinators should be educated on the purpose of the SEED resource and when this resource should be added to a space event request to initiate a SEED review.

Management's Response

A SEED resource will be created in the 25Live scheduling tool that will alert a SEED representative to review a space request before scheduling. The Dean of Students and the RHUU Director will develop a list of questions for unit coordinators to consider/review when determining whether they should add the SEED resource to the webform as part of the planning process/space event request. A module will be developed by the RHUU Associate Director and the Program Coordinator for CSR to incorporate into the CSR training program. The questions and module will be shared with the Campus Event Planners group that reaches a variety of staff across campus who host endowed lecture series and use space on campus. These actions will be complete by August 1, 2024.

2) Publishing a Free Speech/Expression Syllabi Statement

The syllabus is the single most important instrument of course structure; outlining what will be learned, how learning will occur, and how learning will be evaluated. The syllabus may also identify student support resources. University Policy ACAF 2.03, *Creation and Revision of Academic Courses* requires all undergraduate and graduate courses to have a syllabus and specifies certain required sections and statements (e.g., academic integrity, honorable behavior, disability services). The Center for Teaching Excellence (CTE) also publishes syllabus best practices and example syllabus statements for faculty.

During our review, we identified an opportunity to expand published example syllabus statements that are available for faculty to include a statement on free speech/expression. Failure to publish an example syllabus statement increases the potential that faculty will either not include a freedom of speech/expression statement in course syllabi or include a statement that does not align with the University's commitment to free speech/expression.

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Recommendation

The Interim Director for the CTE should draft and publish an example syllabus statement on free speech/expression to the CTE’s website. The example statement should highlight the University’s commitment to free speech/expression on campus and direct students to where they can obtain additional information on how the University cultivates an environment that promotes and embraces the open exchange of ideas and information.

Auditor’s Note: *Two example syllabus statements on freedom of expression have been published on the CTE’s website. Example statements identify the University’s commitment to fostering an environment in which the open exchange of ideas and information is valued, promoted, and encouraged. Example statements also include an embedded link to the University’s Free Speech on Campus website where students can discover how the University actively cultivates an atmosphere that promotes and embraces the open exchange of ideas and information. This recommendation is closed.*

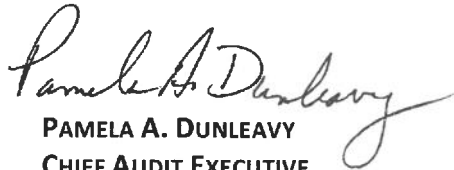
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Our audit was conducted in accordance with the Institute of Internal Auditors’ *International Standards for the Professional Practice of Internal Auditing*. These standards require that we plan and perform our audit to obtain reasonable assurance that the University’s internal control system is adequate and effective in safeguarding assets; University financial records and reports are accurate and reliable; and the University is complying with applicable regulations, policies, and procedures. We believe our audit provides a reasonable basis for the results summarized in this report.

Audit & Advisory Services (AAS) appreciates the courtesies and assistance we received from SAAS administrators and staff. This report reflects our desire to continuously serve the Board of Trustees, University Administrators, the Division of Student Affairs and Academic Support, and the broader University community.

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