

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-BHM-000107

KING'S BENCH DIVISION

BIRMINGHAM DISTRICT REGISTRY

BETWEEN

THE UNIVERSITY OF NOTTINGHAM

Claimant

-and-

- (1) MX JOEL BUTTERWORTH (also known as RIVER BUTTERWORTH (they/them))**
- (5) Non Students/staff: PERSONS UNKNOWN, BEING PERSONS IN AN ENCAMPMENT OCCUPATION OF LAND ON THE JUBILEE CAMPUS AT THE UNIVERSITY OF NOTTINGHAM WHO ARE NOT CURRENTLY STUDENTS, STAFF OR EMPLOYEES OF THE CLAIMANT**
- (6) Students/Staff: PERSONS UNKNOWN, BEING PERSONS IN AN ENCAMPMENT OCCUPATION OF LAND ON THE JUBILEE CAMPUS AT THE UNIVERSITY OF NOTTINGHAM WITHOUT THE CLAIMANT'S LICENCE OR CONSENT WHO ARE CURRENTLY STUDENTS, STAFF OR EMPLOYEES OF THE CLAIMANT**

Defendants

SUPPLEMENTAL WITNESS STATEMENT OF DR PAUL GREATRIX

I, Dr Paul Greatrix of The University of Nottingham, University Park Campus, Nottingham NG7 2RD will state as follows:

1. I am the Registrar of The University of Nottingham ("the University") based at Trent Building, University of Nottingham, University Park Campus, Nottingham NG7 2RD.
2. I am authorised to make this Witness Statement on behalf of the University in support of the University's claim for an Order for possession as set out in the Claim Form and Particulars of Claim.

3. Insofar as the facts and matters referred to herein are within my own knowledge, they are true and in so far as they are not within my own direct knowledge they are true to the best of my information and belief, acquired in the course of acting in my capacity as the Registrar and Secretary to the University's Council ("the Council").
4. I exhibit hereto a bundle of copy documentation to which I shall refer in the course of this Witness Statement, marked "**PG9 – PG17**".

OPEN DAYS ON FRIDAY 28 and SATURDAY 29 JUNE 2024

5. A number of disruptive activities were organised by the encampment at Jubilee Campus during the University's open days on 28 and 29 June 2024. This comprised the following:

5.1 **Leaflets:** leaflets were published by the encampment (which now styles itself as the "Nottingham Encampment for the Liberation of Palestine/NCLP"). This leaflet was produced and handed out by those associated with the encampment to visitors to the University across each open day. As appears from content of the leaflet, it is clearly directed at "Prospective Student" and asks:-

"Would you attend a university that knowingly extracts profit from genocide".

The leaflet goes on to state that:

"Every student deserves to attend a University they are proud of, where the lessons learned in the classroom can be applied in real life without fear of unethical practice".

The intention of the leaflet is clearly to deter prospective students from enrolling with the University. As these open days are the key annual recruitment events for new students for the University, this leaflet is a direct attempt to interfere with the University's usual enrolment procedures. The leaflet is linked to the camp of course as it is on its face it bears a QR Code and references the Nottingham Encampment for the Liberation of Palestine. Copies of the leaflet can be found within my Exhibit marked "**PG9**".

5.2 **Social Media Posts:** These are now produced and shown to me within my Exhibit marked "**PG10**" 3 examples of posts published by "People for Palestine" being another group associated with the encampment on Jubilee Campus. These posts invite everyone to attend at University's Open Day on 29 June with the intention of disrupting the open day itself. There is an invitation to meet at the Portland Building on the University Park Campus. On one of the posts, a statement is made inviting:

“We need everyone here in person to take action at UON...encouraging people not to apply to UON”.

As appears from the photograph within my Exhibit marked “**PG17**”, there was no doubt that members of the encampment are engaged in this disruptive behaviour on the University Park campus. This photograph clearly shows pots of paint and placards being created in the middle of the camp for use in the disruption which followed on the open days. This photograph was taken by a member of the University’s security team on Friday 28 June 2024.

5.3 **Fly Posters:** There is also now produced and shown to me within my Exhibit marked “**PG11**” a series of photographs of fly-posters which were erected without any permission of the University on its signage across its campus. As appears from the posters, they bear the same QR code as NCLP (Nottingham Encampment for the Liberation of Palestine) and the self-styled badge created by NCLP is clearly visible on these posters. Some of them were glued to the permanent signage of the University between the top of Jubilee Avenue, Florence Boot Hall, Willoughby Close and Florence Boot Close on the morning of Friday 28 June 2024. All of this without the permission of the University. As appears from these photographs, some of the posters were also erected on permanent street signs which are part of the public highway, defacing them. When University staff attempted to remove these leaflets, they found they had been glued and nail varnished to signage including open day signage directing visitors and some damage has been caused to University property in the process of removing them. I make the point that there is no authority for anyone to fly –post on or deface any University property.

COMPLAINTS

6 The University has received complaints in respect of the behaviour and actions of the encampment during the open day on Friday 28 June. Those complaints are exhibited in my exhibit **PG12**. The first statement is from a member of the public. The second and last complaints are from members of University staff and have been redacted in order to maintain their privacy and confidentiality. The third is from a Jewish parent who was visiting the advanced manufacturing building at Jubilee Campus with their child. In the opinion of the University, it is considered this action by members associated with the camp amounted to targeted harassment with race hate comments being reported. This is a matter which the University is now investigating with the Nottinghamshire Police.

WELFARE

7 In my first Witness statement at paragraph 43-48, I set out details of steps which the University had taken to protect the welfare of the students engaged in the encampment. Whilst members of the camp have been able to access toilet facilities in the Atrium Building on the Jubilee Campus, the University installed some portaloos immediately next door to the camp on Friday 28 June 2024. These can be

seen as shown in the photograph within my Exhibit marked **PG13**. It is the case therefore, that the encampment has never been without access to appropriate toilet facilities at any time. I am aware of posts which have been made by the encampment via its Instagram social media platform which can be found at the following link:-

https://drive.google.com/file/d/1rET_i_MTSVRJXwaVyzogiX5dNnQr-jJH/view?usp=sharing

As mentioned above, however, there is no requirement for any member of the camp to walk any further than to the portaloo which is located immediately next to the camp. I confirm that this portaloo is regularly maintained by University personnel.

UNAUTHORISED USE OF UNIVERSITY MATERIAL

- 8 It has recently come to our attention that both the Notts Palestine Camp and People for Palestine are displaying on their Instagram web page at the following link:

[Recorder_01072024_110833.mp4 - Google Drive](#)

This is a University video which has been manipulated in such a way that it appears as though this is an official University publication. This video has been manipulated without any authority or permission from the University and the University's digital artwork, its brand, name and logo have been used without our agreement.

- 9 The University is taking steps to raise this infringement of its copyright and intellectual property rights so that all such unauthorised use of University material stops as soon as possible.

- 10 As appears from the video, the following allegations are made against the University:-

“This is the University that helps ruin lives”

That the University is “complicit in genocide”

- 11 A link to this video is now comprised within my Exhibit marked **PG14**.

MEETINGS BETWEEN THE PARTIES

- 12 In my first witness statement dated 14 June, at paragraphs 38-42, I refer to the attempts by the University to meet with the encampment. Since then, two meetings have taken place between myself with the Pro-Vice Chancellor for Education together with members of the encampment who were masked throughout. These meetings took place on 18 and 26 June and were recorded by Microsoft Teams. A full Microsoft Teams produced transcript of the second meeting is now produced within my Exhibit marked **PG15**. As appears from the same whilst a dialogue was maintained with the

encampment, no progress was made as to reaching agreement on the removal of the camp at that meeting.

13 There is also produced in my exhibit marked **PG16** copies of exchanges of emails between the camp and the University and vice versa over the period 27th June to and including 2nd July 2024. It is unfortunate that despite this dialogue and an express request by the University to the camp not to engage in any disruption to University Open Days on Friday 28 and Saturday 29 June, the encampment nevertheless decided to engage in such disruptive activities at this weekend's Open Days.

GRADUATION CEREMONIES


14 In view of the ongoing disruption being caused by the unauthorised encampment at Jubilee Campus, the University is particularly concerned about its forthcoming graduation ceremonies which are due to take place between 15 July and 26 July 2024, and the substantial risk that the encampment will deliberately disrupt these ceremonies as they did with the open days. A student's Graduation Ceremony is perhaps the single most important event in their degree experience and it would be unfortunate if student's experiences and those of their family members and memories are marred by disruption caused by those taking part in this encampment.

RIVER BUTTERWORTH

15 I note that the First Defendant's tenure as the Students' Union Postgraduate Officer ended on Sunday 30 June 2024. From that date also the First Defendant is no longer a student of the University under any measure. As such the First Defendant was no longer a member of the Senate of the University after that date. The Senate is not the governing body of the University; that is the University Council.

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: 
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Dr Paul Greatrix

Position: **Registrar**
The University of Nottingham

Dated: **2 July 2024**