

**An analysis of UK university free speech policies
prepared for the Joint Committee for Human Rights**



Higher Education Policy Institute

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About HEPI

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Introduction

This report has been compiled in response to a request from the Joint Committee for Human Rights (JCHR) to examine a sample of policies on freedom of speech in the UK higher education sector. It forms part of the JCHR's wider inquiry into freedom of speech in UK universities.

This report is intended to enable the JCHR to come to a considered view on whether Government policy on free speech has been interpreted coherently within the UK higher education sector. It also seeks to assist the JCHR to evaluate the practicality and efficacy of existing free speech policies formulated and employed by UK universities.

Policy context

One of the fundamental purposes of higher education institutions is to encourage debate and challenge ideas. Protecting freedom of speech is therefore integral to universities' core missions. All higher education institutions throughout the UK are subject to the Human Rights Act 1998, stemming from Article 10 of the European Convention on Human Rights, which seeks to protect freedom of speech and expression.¹ Universities in England and Wales also have a more specific legal duty to secure freedom of speech on campuses under the 1986 Education Act, which requires them to devise and adhere to a code of practice in this area.²

Developing a framework for preserving freedom of speech according to law is not, however, a simple matter for universities. In devising appropriate codes of practice, higher education institutions must also take into account a series of additional duties, including those enshrined in equalities law, criminal law and public order law. The precise nature of these laws differs in each part of the United Kingdom (UK), with English law covering universities in England and Wales, Scots law applying to universities in Scotland and Northern Ireland law applying to higher education institutions in Northern Ireland.

The Counter Terrorism and Security Act 2015, applicable in England, Wales and Scotland but not in Northern Ireland, places an additional duty on universities to 'have due regard to the need to prevent people from being drawn into terrorism'.³ This is known as the Prevent duty and specifically requires higher education institutions to have systems in place for assessing and mitigating risks around external speakers and events on campus.⁴ Universities must do this while maintaining their overarching duty to secure freedom of speech on university premises – be this enshrined in the 1986 Education Act for English and Welsh institutions or in the Human Rights Act 1998 for Scottish universities.⁵

In effect, what this list of various legal obligations means is that English and Welsh universities have a duty to formulate a code of conduct to secure free speech on campus, which

acknowledges and adheres to all the above legal requirements, yet does not permit the expression of extremist views. Scottish and Northern Irish universities have no legal requirement to create a code of practice to protect freedom of speech. However, some Scottish institutions have openly published policies on external speakers and events in response to the Prevent duty to which they are legally bound.

Information about what a code of practice to secure freedom of speech in universities ought to look like nevertheless remains vague. No template exists, for example, for higher education institutions to follow when creating a code of practice. Some mission groups and representative bodies in the UK higher education sector have attempted to assist their members by producing guidance on the formulation of codes of practice.⁶ Not all universities are, however, aligned to a mission group so some institutions may not receive this assistance, while those that do so are in no way bound to follow it. This has resulted in a variety of codes of conduct to preserve freedom of speech emerging in the sector, with each university adopting different styles, tones and formats for their texts, not to mention different protocols and procedures.

Moreover, the policies which higher education institutions use to secure freedom of speech on campus are coming under increasing scrutiny, as reports of censorship of speakers and events become ever more prominent in the press. In many ways, the *Spiked* Free Speech Rankings, launched in 2015, have thrust the topic of on-campus censorship into the spotlight by providing a public view on the state of free speech, debate and expression in UK universities.⁷

Further to this, the regulatory changes taking place in England under the Higher Education and Research Act (HERA) 2017 suggest the ways in which universities seek to secure freedom of speech could be subject to closer scrutiny in the future by the new market regulator for higher education, the Office for Students (OfS). The OfS is not only set to subsume the responsibilities of the Higher Education Funding Council for England (HEFCE) – including responsibility for monitoring

universities' compliance with their legal duties in England – but will take on new powers as well.

The Department for Education's guidance on registration conditions for the OfS during the consultation phase proposed two new requirements for 'registered' higher education institutions, namely:

- (i) to include in constitutional documents 'provisions and practices to protect freedom of speech'; and
- (ii) to take 'appropriate remedial action', which could mean 'amending governing documents to give greater consideration to freedom of speech'.⁸

Taken together, these requirements look set to increase the duties on English universities to secure freedom of speech over and above the scope of the 1986 Education Act. They also invite the OfS to evaluate the efficacy of individual codes of practice and institutional processes in a way never seen in the English higher education sector before.

The former Universities Minister Jo Johnson confirmed these intentions for the OfS in a Boxing Day announcement, which suggested that formal sanctions (including fines or suspensions) could be just some of the punishments for higher education institutions where free speech is judged to have been visibly suppressed.⁹ Although the regulatory powers for the OfS are yet to be confirmed at the time of writing this report, it looks likely that from spring 2018 – when the new market regulator is fully up and running – universities in England will be required to protect freedom of speech in a more systematic and effective way than heretofore.

Aims and objectives

In light of the increasing focus on universities' codes of practice on freedom of speech, this report analyses a sample of policies from UK higher education institutions to determine whether they assist free speech or are likely to frustrate it. By conducting a close textual analysis of a number of free speech policies, this report seeks to offer insights on the ease of understanding, proportionality and time limits outlined in the texts, to help the JCHR come to a view on their overall effectiveness.

Methodology

The sample size selected for this analysis is 20. Codes of conduct on freedom of speech have been chosen from institutions which reflect the diversity of the UK higher education sector, taking into account geographical differences, institutional types, sizes and mission group affiliations (if applicable). The policies analysed come from the following institutions:

1. Aberystwyth University	11. London South Bank University
2. University of Bolton	12. Nottingham Trent University
3. University of Cambridge	13. Queen Mary University of London
4. Canterbury Christ Church University	14. University of Reading
5. Cardiff University	15. St Mary's University Twickenham London
6. University of East Anglia	16. University of Sussex
7. University of Edinburgh	17. University College London
8. University of Hull	18. University of Winchester
9. University of Leicester	19. University of Wolverhampton
10. University of Liverpool	20. York St John University

This list has been carefully compiled to determine whether there may be correlations with other supposed risk factors related to the universities in question. As such, it incorporates policies from a number of higher education institutions in ethnically diverse areas of the UK (namely Wolverhampton, Bolton, Nottingham, Leicester and London), or with previous high-profile cases of controversy caused by the perceived suppression of free speech on campus. Institutions in this study which have received recent media coverage for free speech issues include:

- Queen Mary University London, which has been in the news for inviting Islamic hate speakers to campus and banning sales of *The Sun* in its students' union;
- Cardiff University over its debate whether to allow Germaine Greer to speak on campus;
- the University of Cambridge after it threatened to shut down a Palestine Society event in November 2017;
- the University of Liverpool over its decision to revoke an invitation to speak to Peter Hitchens;
- Canterbury Christ Church University over the attempt by its Student's Union's Lesbian, Gay, Bisexual, Transsexual (LGBT) representative to 'no platform' Peter Tatchell; and
- the University of Sussex over its students' union request to vet the speech of UK Independence Party (UKIP) MEP Bill Etheridge in October 2017.

The list also contains some universities with religious underpinnings to ascertain whether higher education institutions with religious missions take a different approach to securing freedom of speech. Since there are no universities in the UK with non-Christian foundations, only higher education institutions with Catholic or Church of England missions have been included in this study – all of which are members of the Cathedrals Group of universities.¹⁰

Moreover, only policies which are freely available online have been used for this research.¹¹ This decision was made on the assumption that a member of a university wishing to organise an event or book an external speaker would most likely rely on material that is easily accessible to them on university websites or via links provided by students' unions. Since the purpose of these codes of practice on freedom of speech is to facilitate the organisation of events on campus in the most appropriate manner, we can reasonably expect the policies to be openly available online and easily retrievable through a simple internet search.

Although this study includes a representative number of universities in England and Wales, it is acknowledged that the sample chosen incorporates only one Scottish higher education institution and no universities in Northern Ireland. This is precisely because an initial, yet comprehensive, internet search returned no results for policies on freedom of speech from any institutions in Northern Ireland and only very few results from universities in Scotland. This is likely due to differences in the law, since (as has been mentioned earlier in this report) neither Scots law nor Northern Ireland law requires higher education institutions to formulate codes of practice on freedom of speech. This is reflected in the fact that the only Scottish university in this analysis – the University of Edinburgh – has a 'policy on speakers and events', as opposed to a specific code of practice on freedom of speech.

Care has also been taken to ensure the study includes a wide range of universities based in the Greater London region. The high number of London-based institutions, which account for almost a quarter of universities in this study, should not however be seen as disproportionate, but reflective of the high degree of prominent free speech cases in the media in these areas, as well as the multi-cultural communities in which these institutions are situated.

Overall, it is hoped the sample of universities selected for this study will lead to findings that are representative of the UK higher education sector as a whole. It should nonetheless be borne in mind that any conclusions made in this report are based

on a sample of 20 institutions alone and may benefit from being tested more widely against other institutions' free speech policies and codes of practice.

Approach

To determine the key features of universities' codes of practice on freedom of speech, this report asks the following questions:

- How easy are the policies to follow?
- How much detail do they offer?
- Do they include clear processes and procedures?
- Are there any unreasonable requests for information?
- Is it evident who is responsible for the final decision?
- Are the timescales involved clear and realistic?
- Are there multiple options in place for mitigating against possible negative outcomes?
- Is there a fair appeals process?
- Do the policies make reference to other competing policies or procedures?
- Are the policies appropriate to the particular demographics or cultural contexts of the institutions in question?

By answering the above questions, this report seeks to enable the JCHR to come to a considered view about what works in different institutional free speech policies and what features, if any, may be seen as unhelpful or a hindrance.

The report concludes with a standalone appendix, analysing the various sector guidance that is available for universities throughout the UK on freedom of speech. This will enable the JCHR to assess to what degree higher education institutions' free speech policies may have been influenced by their relevant mission groups and representative bodies.

Annexes

This report is supplemented by two Annexes containing snapshots of all the information used to prepare this research:

- Annex 1 (prepared by Tom Huxley) contains data on a total of 30 different institutional free speech policies – namely the 20 analysed by HEPI in this report plus a further 10 previously considered by the JCHR’s internal research team; and
- Annex 2 (prepared by Vicky Olive) contains data on all the additional sector guidance that is available for institutions to follow in each of the four parts of the UK.

The red-amber-green colour coding used in Annex 1 reflects the rankings for the universities in this study from the newly published *Spiked* Free Speech Rankings 2018. We do not endorse these rankings, nor have they been used to select the institutions analysed in this report, but the information has been added because of the publicity the rankings have received.

The colours used in Annex 2 serve no other function than to separate out the different categories of guidance analysed from mission groups, representative groups, regulatory bodies and the devolved administrations.

Analysis

The UK higher education sector is renowned for its diversity. Just as all universities in the UK are distinctive from each other, an analysis of policies from a sample of higher education institutions reveals that so too are their codes of practice on freedom of speech and the way they implement these policies. Although the need for universities to have codes of practice on freedom of speech is enshrined in English law, the format, style and content of these codes is not prescribed. The following chapter uncovers, therefore, the commonalities and disparities that exist between various codes of practice in the sector.

Format

First and foremost, the sample of institutional policies analysed for this research reveals that the majority of universities have chosen to entitle their free speech policies as a 'code of practice', as per the law. There are, however, a few semantic differences:

- Queen Mary University London has a 'Freedom of Speech Policy';
- St Mary's University Twickenham has a 'Policy and Procedure' on freedom of speech;
- the University of East Anglia (UEA) expands its code of practice to cover 'freedom of speech and activities, events and meetings';
- Canterbury Christ Church University has a 'Code of Practice on the Freedom of Speech and External Speakers'; and
- the University of Edinburgh has a 'Policy on Speakers and Events' (although it is not bound by Scots law to have a specific code of practice on freedom of speech).

The longer titles employed by some of these universities for their policy documents help to make clear that their codes of practice apply equally to external speakers and events, and are not just for internal use only.

The University of Cambridge's free speech policy differs significantly from the other codes of practice analysed in this sample. The University of Cambridge is the only higher education institution in this study where internet searches for free speech policies lead to a one-page 'University Statement' on freedom of speech released by the University's Registry's Office. This statement is hosted in plain text format on the University's website and references the University's more specific 'Code of Practice on Meetings and Public Gatherings on University Premises', which it henceforth refers to as 'the Code'. As the Statement insinuates, the two documents should be read together, as the 'Statement and the Code provide the only mechanism by which the University can cancel or impose conditions on University meetings or events where this action is deemed necessary'. Although a statement such as this is not strictly necessary, it affords the University the chance to separate its assertions of institutional commitment to freedom of speech from the legal framework required by law.

Starting points

Several codes of conduct in this study begin with an acknowledgement of the importance of free speech to the core missions of higher education institutions. Much of this language is couched in rhetoric about the 'values', 'tradition', 'spirit', 'culture' or 'principles' of the universities in question and comes before any recognition of universities' obligations and duties to preserve freedom of speech imposed on them by law. For example:

- the University of Winchester's code reveals it is 'committed through its Values to intellectual freedom including Freedom of speech';
- Nottingham Trent University says 'the freedom to express ideas and opinions is a fundamental principle';
- the policy of University College London (UCL) explains it 'has a long tradition of seeking to safeguard freedom of speech'; and

- Queen Mary University London (QMUL) states its 'policy on freedom of speech is set within the context of our values'.

Framing freedom of speech as an integral part of university life can be seen as an effective rhetorical device, which helps institutions eliminate any doubt in the reader's mind that they would seek to restrict the expression of opinions or ideas unnecessarily.

The 'Statement on Freedom of Speech' released by the University of Cambridge in conjunction with its code of practice serves the same purpose and is particularly effective at reassuring readers of the University's commitment to freedom of expression, since its first paragraph is devoted to underscoring the need to:

- 'foster an environment in which all staff and students can participate fully in University life';
- 'feel able to question and test received wisdom';
- 'express new ideas and controversial or unpopular opinions, without fear of disrespect or discrimination';
- 'receive and respond to intellectual and ideological challenges in a constructive and peaceable way';
- 'engage with a wide range of viewpoints'; and
- 'listen, dissect, analyse, reason, adjudicate, and respond to those viewpoints'.

The Statement goes on to say that 'these commitments are reinforced by Article 10 of the European Convention on Human Rights and by domestic legislation', thereby clearly accentuating the fact that the University's commitment to freedom of speech predates any legal requirements imposed upon it. The use of this supplementary Statement almost as a 'cover letter' to the actual policy helps to give the impression of a University which is proactively defending free speech in the best interests of its

staff, students and core mission, and not simply responding to external pressure from Government and the law.

Purpose

The free speech policies analysed for this report reveal that UK universities have different views on what their codes of practice are for. Some institutions have chosen to explain the purpose of their free speech documents in the main body of the text. Of those that have done so, some see it as positively promoting not just free but also respectable speech, while others see it as a necessary compromise between two sets of competing duties. The universities clearly using their codes of practice to bolster their commitment to free speech are:

- Canterbury Christ Church University, which sets out the purpose of its code as being 'to provide means of ensuring debate and challenge are not only permitted but promoted'; and
- the University of Cambridge, which uses its statement on free speech as a weapon against extremist views. It states: 'Debate, discussion and critical enquiry are, in themselves, powerful tools in preventing people from being drawn into terrorism. The University has drawn up this Statement with these principles in mind'.

Other universities have nevertheless assumed a more resigned tone and have chosen to include in their codes of practice an acknowledgement of the dilemma facing them, having obligations to protect freedom of speech on the one hand, yet to prevent against the promotion of extremist views on the other. These universities explicitly refer to their need to balance these competing duties. For example:

- the University of Wolverhampton's code of practice states that it has been approved 'to balance, where it is reasonably practicable, its obligations to secure academic freedom of speech with its duties to ensure the law is observed';

- the University of Edinburgh’s code admits ‘the University must balance its obligation to secure free speech against its duty to ensure that the law is observed’; and
- the University of Sussex’s code of practice explains ‘there is a delicate balance to be maintained when some of these duties appear to be at odds with others, or where issues overlap’.

Such admissions of compromise and balance serve to warn readers of the complexity of the policies that follow and act almost as a disclaimer for the processes and procedures the universities have opted to implement.

Length

The 20 free speech policies analysed for this study vary significantly in length, ranging from just 3 pages to 47 pages. As universities are free to design their own codes of practice as they see fit, there are also vast differences in font size, margin size and format, making it difficult to compare the policies’ lengths directly.

The longer policy documents in this study do not necessarily contain more policy content, however. Instead, the longer documents generally contain additional material such as process flowcharts, template forms, risk registers, other relevant policies and explanatory notes or guidance from other sector bodies (see Appendix 1). Some examples of more comprehensive free speech documents include:

- The University of Liverpool’s code of practice, which is 47 pages long. With the policy itself only covering pages 3 to 13 (10 pages in total), the rest of the document is made up of appendices showing processes for booking rooms, the relevant application forms and supplementary guidance from Universities UK.
- Cardiff University’s code of practice, which is 28 pages long. However, the policy on free speech is only printed on pages

2 to 9 (7 pages in total), with the rest of the document comprising process flowcharts, a summary of relevant legislation and a template of an 'events and speaker' booking form.

As Annex 1 to this report shows, it is not uncommon for institutions to publish supporting documentation alongside their codes of practice on freedom of speech. These supporting documents are generally three-fold, comprising:

- separate policies and codes of practice on the conduct of events (if not already included in the code of practice on freedom of speech);
- risk assessment protocols and procedures; and
- room booking guidance and application forms.

Adding this supporting documentation to the codes of practice on freedom of speech has both advantages and disadvantages. On the one hand, having everything in one document helps members of the universities access all the information and forms that they need in one place. On the other hand, putting everything together can make the policies seem long, burdensome and off-putting for potential event organisers.

Proportionality

The length and content of the codes of conduct analysed for this study bear no correlation to either the size of the universities in question or the nature of the institutions. For example:

- From the Russell Group institutions in this study, there are vast discrepancies in the length of the policy documents. The University of Liverpool's document is 47 pages long and Cardiff University's is 28 pages long, but UCL's code of conduct is just under six pages long. The University of Cambridge's 'Statement on Freedom of Speech' is also just over one printed page of A4.

- Larger universities also do not have longer policies than smaller higher education institutions. The code of conduct from the UEA (with over 14,000 total enrolments), for example, is a mere three pages long, while the code of conduct from the University of Winchester (with just over 6,000 total enrolments) is 20 pages long.

Of the universities which have experienced prominent cases in the media concerning the suspected suppression of free speech, there are also significant variances in policy length. The University of Cambridge and University of Sussex, together with QMUL, have far shorter codes of practice (all at three pages long) than the universities of Liverpool and Cardiff. Three-page policies are, however, shorter than average, while 47 and 28-page policies are considerably longer than average, so there may well be something to be said for policies which are particularly vague on the one hand, or overly-detailed on the other, leading to confusion when organising events.

Accessibility

The majority of universities in this study host their policies online in a Word or PDF document, which can be easily downloaded and printed out by users who require them. All but one institutions' policies are contained in a code of practice on freedom of speech. The University of Cambridge has opted, instead, to issue a 'Statement on Freedom of Speech' alongside a code on meetings and public events. Although this 'Statement' helps the institution to explain its commitment to the principles of free speech, an assessment of its practicality reveals that this Statement is not particularly user-friendly. For instance, the Statement contains no hyperlinks or footnotes to its associated 'Code of Practice on Meetings and Public Gatherings'. The only indirect reference to this code of practice comes in the 'related links' section at the end of the Statement, where 'other University regulations and policies (Legal Services)' are alluded to, but again no links are provided for the reader to follow. For the purposes of this study, the University's code of practice was located through a separate internet search, looking specifically for it. The lack of links or other internet signposting to this code was, therefore, not found

to be practical for potential event organisers trying to locate the policy swiftly and easily.

The University of Cambridge is not, however, an outlier when it comes to not helping users to navigate through related documentation. An analysis of the 20 codes of practice in this study reveals that it is often left up to the reader's own initiative to source out relevant documents and, as Annex 1 to this report shows, universities may have several related policies, codes, templates or forms. Some higher education institutions have nevertheless found ways to help event organisers navigate through the relevant bureaucracy. For example:

- York St John University's code of practice employs an effective use of hyperlinks throughout its text, directing readers to additional material such as legal documents, room booking forms and supplementary guidance; and
- universities like Cardiff and Liverpool have chosen to put all the relevant material together in one document, leading to much longer policy documents than the others in this study.

Higher education institutions which include the full web addresses to relevant links and forms in their codes of practice should also be credited for enhancing their policies' accessibility. Writing out links in full enables the documents to be accessed by anyone using a printed copy of the policy on which hyperlinks and other internet signposting may not be apparent. Universities including full web addresses in their texts include:

- the University of Cambridge, which includes web addresses in footnotes on relevant legislation and Government definitions of 'proscribed' organisations;
- the University of Leicester, which includes full web addresses within its codes' text to online room booking forms;
- the University of Edinburgh, which provides full web addresses for supporting documentation from Universities UK; and

- the University of Winchester, which displays full web addresses for Government legislation and other University policies (such as the University's Research Ethics Policy).

Finally, Cardiff University is the only higher education institution in this sample to include on the cover of its code of practice on freedom of speech the option to access the document in an alternative format, thereby suggesting that they have thought of event organisers who may need the document in another language or an alternative format such as braille. This is presumably related to the obligation to treat the Welsh and English languages 'on the basis of equality' under the Welsh Language Act 1993, yet the wording used by the University in this code allows it to interpret this duty more widely.¹²

Timescales

Just as the length of the policies in this study vary considerably, so too do the timescales required by the universities to assess whether an event should go ahead as planned or not. All but one higher education institution in this sample require an application to be submitted to host an event or an external speaker by a set point in time in advance of a meeting. The only institution not to specify any timeframe for applications to host an event or speaker is the University of Bolton.

UCL's code of practice similarly stands out for its vagueness when it comes to deadlines, stipulating only that 'requests must be made as far as possible in advance of the projected meeting date'.

Of the institutions in this sample that do stipulate specific dates, it is notable just how widely the timescales vary. As Annex 1 to this report shows, the longest lead-in period for the intention to hold an event on campus or invite an external speaker is roughly one month. This is required by four universities in this study, namely:

- Canterbury Christ Church University, which requires four weeks' lead-in time;
- the University of Reading which 'ideally' requires 28 days' notice of the intention to hold an event (so arguably holds itself open to leniency);
- St Mary's University Twickenham, which equally requires 28 days; and
- Aberystwyth University, which requires notice 'at least 30 days prior' to a date of a meeting 'if the organiser... is in any doubt whether the meeting should be classified as notifiable'.

By contrast, the University of Cambridge requires the shortest lead-in time for events, stipulating that notice be given 'at least five clear days' before a meeting or speaker address. (However, the University does require that a room booking be made at least 14 days in advance if a room is to be reserved for the event in question.)

The most popular number of days' notice required by institutions is 10, with the University of Edinburgh deeming this to be 'timely notice' in the main body of its code of practice.

Whether non-working days such as weekends or bank holidays are counted in institutional lead-in times remains ambiguous in many of the codes of practice analysed for this study. Only seven institutions refer explicitly to 'working days' in their policies, with the rest leaving this decision open to interpretation by their users – something which could be a possible cause of contention between the universities and event organisers.

Relevance

Of the universities in this sample whose codes of conduct include the date they were approved, the majority have been clearly rewritten or reviewed since the Prevent Duty came into effect on 21st August 2015. There are, however, some notable exceptions

to this rule which were published before the Prevent Duty came into force, namely:

- the University of Hull's code of practice which is dated September 2014;
- the University of Leicester's code of practice which was last reviewed in May 2015;
- the University of Reading's code from July 2015; and
- UCL's code of conduct which was last updated in 2010.

This suggests that some universities do not review or update their codes of conduct regularly or in view of each new relevant piece of legislation that comes into force, risking operating according to outdated policies, processes or procedures.

It is nevertheless apparent from several codes of practice analysed for this report that protocol varies widely in the sector and some universities are, indeed, committed to regularly reviewing their free speech policies. For example:

- Aberystwyth University's cover page for its code of practice tells us that it is up for review on 11 May 2018;
- the covering page of the University of Winchester's code of practice similarly informs us that its review date is 1 May 2018;
- the final section of Canterbury Christ Church's code of practice explains it 'will be reviewed every three years' and that the 'next review will take place in March 2019';
- QMUL's code of practice ends with the note that it is 'due for review in March 2019'; and
- the cover page of the University of Liverpool's code of practice informs us that it is scheduled for review in April 2019.

Regular review dates are, therefore, implemented by some institutions for their codes of practice, although it remains unclear whether *ad hoc* reviews of documentation are implemented by these institutions in case of changes to the relevant legislation during the policies' validity period.

It has also been noted that St Mary's University Twickenham's code of conduct was up for review in 2017, although no updated version of its code could be found online. This suggests that the process between the approval of codes of practice on freedom of speech and the eventual publication date may be lengthy in some institutions and, therefore, risk impeding members from accessing the latest policies.

Geographical remit

Although most of the codes of practice in this analysis refer to the fact that free speech policies govern both university premises and instances where the institutions' names are used for an event taking place elsewhere, very few policies refer to any potential international implications for these duties. Some notable exceptions include:

- Canterbury Christ Church University, which stipulates that its policy applies to 'venues in the UK or overseas'. In doing so, it acknowledges: 'While the law differs in other countries, all activities led or co-hosted by the University, irrespective of where they take place, are to comply with this Code unless to do so would breach that country's law'.
- The University of Liverpool, which acknowledges 'the same principles will apply to any University branded activity overseas' even though 'legal obligations differ overseas'.

Including statements similar to these signal to an event organiser that the policies contained in the codes of practice on freedom of speech ought to be given precedence over other international legislation, unless contradictions occur.

Accountability

From the sample of free speech policies analysed as part of this report, it is apparent that different members of the universities' senior leadership teams have different responsibilities in the assessment process. In the vast majority of cases it is the Vice-Chancellor (or equivalent Principal, President or Provost) who is responsible for receiving an appeal and making the final decision on whether an event should go ahead or not on university premises. At Nottingham Trent University the final decision could rest with the Vice-Chancellor, Senior Pro Vice-Chancellor or Pro Vice-Chancellor (Culture).

It is not, however, generally the Vice-Chancellor who is charged with making the initial assessment. The responsible officer varies in this sample between:

- Chief Operating Officer (COO);
- Director of Estates and Facilities;
- Director of Strategic Planning and Governance;
- Senior Proctor;
- Registrar;
- Deputy Vice-Chancellor;
- General Counsel; and
- Head of Campus Support.

Some institutions also rely, instead, on a panel to make the initial assessment of whether an event should go ahead or not. These include:

- the University of Sussex, which has an 'External Speakers' Panel', 'normally drawn from the broader Leadership Team of the University'; and

- London South Bank University, which relies on decisions from its COO, the Executive Director of Human Resources and the Dean of Law and Social Sciences.

Where a panel like this is employed, it is presumably to ensure a wide range of views are represented in the decision-making process, including legal opinions as demonstrated by London South Bank University's decision to involve its Dean of Law.

Clarity and definitions

Several codes of conduct analysed in this study refer to the fact that speakers who are known or suspected to belong to 'proscribed' terror groups or organisations under UK law must not be invited to speak on campus. Yet very few policies explain what these proscribed organisations are. Higher education institutions such as the University of Cambridge are careful not to assume readers have prior knowledge of the list of proscribed organisations. Cambridge's 'Statement on Freedom of Speech' includes links in footnotes to the relevant Government legislation surrounding proscribed organisations, which provides a helpful starting point for members of the universities wishing to host an event or an external speaker with an attachment to any of these groups.

The universities in this sample also differ in their definitions of what constitutes a meeting to which the codes of practice on freedom of speech apply. For example:

- Aberystwyth University says 'references to meetings and events shall include, but not be limited to: lectures, seminars, committee meetings, and musical and theatrical performances'; while
- London South Bank University's code of practice says a 'meeting means any gathering or assembly of more than three persons on any University premises'.

These differences in definitions between larger gatherings of people or smaller discussions could lead to confusion as to what

size of meeting needs to be reported if there are any concerns over the nature of the speaker or the event.

Use of visuals

Over one-quarter of the codes of practice analysed for this report include flowcharts, or attempts at visualising the assessment and mitigation process for external speakers or events. These are contained in the policies from:

- Aberystwyth University;
- Cardiff University;
- St Mary's University Twickenham;
- the University of Sussex;
- the University of Winchester; and
- the University of Wolverhampton.

The University of Liverpool's code of practice regarding freedom of speech also contains a chart showing the process for accepting a booking, but this is of less use to members of the university wishing to host an event or an external speaker than it is to the staff members responsible for deciding whether the proposed meeting should go ahead or not.

The inclusion of process flowcharts help to illustrate the policies detailed in the codes of practice and can help event organisers to navigate their way through otherwise complicated procedures.

Appeals processes

All the codes of conduct analysed for this report permit appeals. In the majority of cases, appeals are to be submitted to the Vice-Chancellor (or their nominee). The length of time required by universities for the submission of these appeals nevertheless

varies considerably between institutions, ranging from appeals needing to be received 'within two working days' of the decision being made at QMUL, to within 14 working days of permission being refused at St Mary's University Twickenham.

Of the codes of practice on freedom of speech in this study, there are generally no time limits set within which the result of an appeal must be announced. Both St Mary's University Twickenham's free speech policy and that of the University of Edinburgh state only that their Vice-Chancellor will consider any appeal 'as soon as is reasonably practicable', thus failing to give event organisers clear timelines for when their appeals cases will be heard.

Several universities even use their policies on freedom of speech to enshrine in them their right to take time over the appeals process. For example:

- the University of Winchester states 'it will not normally be possible to resolve an appeal quickly and it is likely that a proposed event will need to be postponed'; and
- the University of Sussex similarly says: 'if there is insufficient time to hear the appeal before the scheduled date for the Event, the Event may have to be postponed pending the outcome of the appeal'.

This buys the institutions time to make a decision about the appeals in question, yet leaves the event organisers in limbo, not knowing when they will receive news of their petitions.

Religion

Of the three Cathedral Group universities in this study, two make reference to their religious underpinnings in their codes of practice on freedom of speech:

- While most higher education institutions in this study tend to see the 'freedom of expression' as integral to their core missions, Canterbury Christ Church University seeks to

preserve 'the ability of all its members to challenge freely prevailing orthodoxies' – illustrative of its religious mission. The first paragraph of its code of practice explains that it sees this as central to 'the University's values as a Church of England Foundation', yet it makes no further reference to religion in its policies, neither prioritising Christianity nor discriminating against other religions.

- St Mary's University Twickenham's code of conduct clarifies the fact that its policies need 'to be set within the context of the University's values and within the legal Objects of the University which includes the advancement of education in such manner as befits a Catholic foundation'. The code also stipulates that 'staff, students and the external organisers of events have a responsibility to be sensitive to the University's values and its Catholic foundation' and that this also applies when representing the University 'in an official capacity off campus'. Unlike Canterbury Christ Church University, however, St Mary's University Twickenham's Catholic foundations have visible implications for the application of its code of conduct. The University's code stipulates that 'this policy does not apply to the University Chapel, the Crypt or the "Chapel in the Woods" to which separate rules apply under Canon Law'. This suggests, therefore, that in sacred spaces on campus in Catholic institutions loopholes may appear.

The code of practice from St Mary's University Twickenham also suggests further loopholes. It is, after all, the only policy in this sample to admit:

This Policy does not normally apply to activities directly linked with the academic work of the University, committee meetings, official Trade Union activities and sporting, social or cultural events.

This suggests that breaches of the code may occur in any of the above settings and it may be unclear whether the suppression of free speech in any of these situations can be considered an offence under the law.

Further to this, this study has revealed that some higher education institutions without religious foundations are also sensitive to religious contexts:

- The University of Bolton refers to religion in the Appendix to its code of practice relating to freedom of speech. In an 'indicative list of circumstances which might give rise to a reasonable apprehension that disruption or disorder may occur', it cites examples of when the guest or visiting speaker includes 'any religious cleric or representative'. It also specifically mentions incidences 'where the subject matter may be considered to be of a blasphemous nature (not just in respect of Christianity)'. In a footnote, it defines blasphemy as per the Oxford English Dictionary's definition as 'irreverent talk about God or sacred things'.

According to the 2011 census results, the proportion of Muslims in Bolton is more than double those in the rest of England, with 11.7 per cent of the town's population registered as Muslim compared to five per cent elsewhere in the country. Similarly, while an average of 1.5 per cent of the population in England classify themselves as Hindu, in Bolton this figure is 2.2 per cent.¹³ The use of qualifiers in brackets and in the footnote therefore suggest the University of Bolton is aware of its ethnically diverse backdrop and is careful not just to restrict its suggested 'watch list' to Christian figures or concepts. Indeed, by using Christian examples before explaining that they could also apply outside Christianity and to other 'sacred things', the University protects itself from allegations that it is focusing unfairly on restricting speech from non-Christian speakers. This is a significant nuance in an area where the Prevent Duty may be at risk of causing heightened tensions.

- The University of Leicester recognises that the requirements of certain religions may allow for acts to occur which would otherwise be restricted by its code of practice on freedom of speech. One such act is that of 'segregation according to gender', which it acknowledges 'is permissible during acts of collective religious worship as this is not

subject to equality legislation'. The University therefore uses its code of practice to stipulate that 'no segregation is permitted at any meeting or event at the University which precedes or follows on from an act of collective worship', thereby closing off the opportunity for members to hide any attempts at gender segregation behind religious practices.

York St John University's code of practice on freedom of speech, nevertheless, says that 'the encouragement of gender segregation is not permitted at events' and 'this does not exclude the possibility of gender segregation during collective religious worship', demonstrating how it feels its policies on free speech ought to take prominence over religious practices.

- London South Bank University reaffirms in its policy on freedom of speech its 'commitment to the principles of multi-ethnic education'. Although this does not directly mention religion, it nevertheless sends a positive message to readers from other faith and ethnic backgrounds that the University is prepared to let a multiplicity of voices be heard.

Unusual requests

Despite most universities' protocols and procedures for assessing external speakers being broadly similar, this investigation has revealed some unusual requests from institutions. These include:

- Language stipulations – York St John University requires that 'all materials provided in relation to an event, including its promotion, be provided in English', while the University of Bolton needs to know 'the language in which meetings will be conducted, if not in English'.
- Speakers' awareness of the code – The University of Winchester requires that 'all external speakers are to be provided with a copy of [its] Policy or the relevant web link'.

- Requests for transcripts – Some institutions, like the University of Liverpool, may ask for speakers 'to provide an outline of their speech for approval prior to the event taking place'.
- Speakers' birth dates – Although it appears to be common practice for universities to require the name of any invited speakers, details of their talks and the location and timing of events, the University of Hull's code of practice goes one step further by asking for the 'date of birth of the speaker' as well.

Unique features

Although several universities in this study have chosen to supplement their codes of conduct with additional material such as process flowcharts, template forms and relevant legislation, some universities' policies contain other unique features, including:

- Self-assessment guidance – The University of Sussex's code incorporates a list of questions that it feels event organisers should be asking themselves and provides relevant links to Government legislation.
- 'RAG' ratings – The University of Wolverhampton's code includes a ratings chart, against which members of the University can test a potential event or external speaker to determine the risk they post to free speech and the mitigation required.
- Checklists – The University of Winchester's code includes a checklist for staff supporting event management, which helps staff as well as event organisers who can see the kinds of questions that are being asked about the meeting they intend to host.

Sector guidance

Several universities in this study explicitly refer to guidance from the representative body, Universities UK (UUK). For example:

- York St John University's code of practice says at the outset that it 'incorporates additional guidance provided by UUK'; and
- the University of Liverpool's code of practice contains, in Appendix VIII, a so-called 'extract' from UUK's guidance on the rights and responsibilities in UK universities regarding freedom of speech on campus from 2011. This extract is nevertheless 16 pages long so it is less an excerpt of text, but rather a whole section of guidance which has been lifted verbatim from the UUK report. The University of Liverpool also acknowledges in a footnote that 'this guidance has not yet been reviewed in light of the Counter Terrorism Act 2015 and the Prevent Duty Guidance for higher education institutions in England and Wales', despite the University's code of practice having been approved by Council in 2016. The utility of this Appendix is therefore questionable, as it is acknowledged it is out of step with other developments in the law.

No guidance from any other sector body is explicitly referenced in any code of practice analysed for this report, although we realise other sector bodies may have fed in to the UUK guidance during the consultation process.

Students' unions

The vast majority of codes of practice on freedom of speech analysed for this report stipulate that they also apply to the universities' students' unions. Some typical examples are illustrated by:

- Nottingham Trent University's code of practice's rights and obligations which apply to, among others, 'the Nottingham Trent Students' Union and any of its societies, clubs or associations'; and

- the University of Reading, whose code applies to 'any organised meeting, gathering or similar activity which takes place on the premises of the University (including the Students' Union Building) or which takes place elsewhere but is under the control of the University or any constituent part of it (including the Students' Union and clubs and societies affiliated to the Union)'.

However, the one clear exception to this rule comes from the UEA's code of practice on freedom of speech, which specifies that 'the Students' Union will operate its own arrangements for reviewing activities and bookings on University premises made by its officers, staff, clubs and societies'. This means the UEA is the only institution in this sample whose code of practice on freedom of speech is in line with the guidance from Universities UK (analysed in detail in Appendix 1 to this report), which considers students' unions not to be directly subject to university legislation governing free speech.

Conclusions

This analysis of 20 codes of practice on freedom of speech from different UK universities has revealed:

- Only higher education institutions in England and Wales are required to have codes of practice on freedom of speech under the 1986 Education Act, however some universities in Scotland have codes on external speakers and events in response to the Prevent Duty.
- All institutional free speech policies are unique, generally following different formats, styles and lengths.
- Not all universities' codes of practice on freedom of speech have been updated in light of major changes to the law in this area, particularly the Prevent Duty from August 2015.
- Not all universities agree on the definition of what constitutes a meeting to which their policies on freedom of speech apply – for example, some suggest it applies only to larger gatherings (like lectures or cultural events) while others say it can apply to meetings of three people or more.
- The length of codes of practice on freedom of speech are neither proportionate to the size of the institution nor the age or stature of the institution.
- Longer policy documents are not necessarily more arduous or complicated, but tend to contain additional material of assistance to event organisers, including flowcharts, relevant legislation and sample application forms.
- The inclusion of process flowcharts can help event organisers to visualise what is required of them in a step-by-step way.
- The inclusion of full web addresses in footnotes or endnotes can be more beneficial than hyperlinks to help event organisers who may be using printed copies of the policies.

- Institutions with prominent media stories about the suspected suppression of free speech tend to have both shorter and longer than average codes of conduct.
- Universities with religious missions do not have any additional requirements to protect free speech, however free speech laws may come into conflict with Canon Law in sacred spaces in Catholic institutions.
- Loopholes can also occur in the law in areas where institutions deem their policies on free speech not to apply, such as during academic teaching, sporting or cultural events, trade union meetings or committee meetings.
- Universities in ethnically diverse areas are mindful to reflect their tolerance for non-Christian views in their policies.
- Some institutions may require information that is not necessarily known by event organisers – for example, a speaker’s date of birth.
- Different senior members of universities can be responsible for overseeing the initial assessment and mitigation process, however it is usually the Vice-Chancellor who has the final decision and oversees the appeals process.
- It is standard to have an appeals processes in the sector, but timescales for appeals may vary and universities are not bound to respond to appeals within a certain timeframe.
- The guidance issued by UUK appears to have been the most helpful to universities, with several of them referencing it in their own codes of practice.
- Universities’ largely tend to see their codes of conduct as applying to students’ unions, which is in stark contrast to the advice issued by UUK.

Appendix 1: Analysis of sector guidance

This appendix to the report asks what guidance is available for higher education institutions throughout the UK to support them when compiling their codes of practice on freedom of speech. It looks at what information is available from the different mission groups in the sector, as well as from the main representative bodies. It is important to examine both, as universities can be attached to a mission group as well as a representative group or, indeed, neither. Considering the different legal obligations on universities in each of the four parts of the UK, this appendix also examines what guidance has been published for higher education institutions regarding freedom of speech in the devolved nations, as well as what support is available from the sector regulators in each nation.

This appendix is supported by a spreadsheet displaying links to all the information available, contained in Annex 2 to this report.

Mission groups

Of the three main university mission groups: the Russell Group, University Alliance and MillionPlus, both the Russell Group and Million Plus published a response to the consultation on the Prevent duty guidance that came from the Counter Terrorism and Security Bill 2015. MillionPlus also published a parliamentary briefing on the issue, whilst University Alliance has published nothing.

Both the Russell Group and MillionPlus, in their responses to the consultation on the Counter-Terrorism Bill in 2015 argued in favour of the protection of free speech over more prescriptive guidance and restrictions from the Prevent duty. MillionPlus specifically argued that universities should be excluded from the scope of the Prevent duty. The Russell Group and MillionPlus argued that universities should have the freedom to encourage the free discussion of ideas, however radical, within the law, and both were particularly concerned about the inclusion of 'non-violent extremism' within the scope of universities' Prevent duties. Furthermore, both groups argued that universities should not be held legally responsible for ensuring that unions comply

with the Prevent duty, as student unions are mostly autonomous and separate legal entities.

Representative groups

Of the three representative groups in the sector: Universities UK (UUK), GuildHE and IndependentHE, only UUK has published guidance on the issue of free speech. Both GuildHE and IndependentHE held an event about the Prevent duty in universities and the relation with the protection of free speech. GuildHE's event took place in 2011, whereas IndependentHE's event took place in 2016 after the Prevent Duty had come into force and was specifically aimed at senior managers. IndependentHE also had two news articles on their website relating to the issues from 2016 and 2017.

Universities UK published several parliamentary briefings in response to various stages of the Counter-Terrorism and Security Act and about free speech in universities more generally in 2014-2015, a guide to free speech in 2011 and a guide to external speakers in 2013. They also published three blog posts on the topic in 2015, 2016 and 2017. Along with MillionPlus and the Russell Group, Universities UK supported the duty of universities to promote free speech within the constraints of the law, including speech that is controversial and extreme, and opposed the use of 'non-violent extremism' in university settings. They also acknowledged that universities must take the safety and security of staff and students into practical consideration when organising events and external speakers.

Moreover, Universities UK oppose 'no-platform' policies and suggest that universities must take action to 'prevent an invited speaker from being denied access to university premises'. They also argue that universities should be able to make their own policies relating to free speech and external speakers, and that these policies will, and should, differ across the sector to some degree, given the autonomy of institutions and the diversity of the sector. They also argue that student unions are generally legally separate bodies from universities and not directly subject to the legal duty relating to free speech, however, a university's

duty to prevent the denial of use of premises extends to their own premises and student union premises where these are not owned by the university.

The Cathedrals Group have not published any materials or articles on their website relating to freedom of speech.

Devolved nations

In the devolved nations, the same guidance applies to England and Wales, although there are different regulators for each. There is separate guidance for Scotland, which is similar in many respects but there are a few key differences. The guidance for England and Wales features:

- Greater description of why the Prevent policy in universities is required:
 - Paragraph 1: 'But young people continue to make up a disproportionately high number of those arrested in this country for terrorist-related offences and of those who are travelling to join terrorist organisations in Syria and Iraq. RHEBs must be vigilant and aware of the risks this poses'.
- Greater reference to the radicalisation of students:
 - Paragraph 15: 'Radicalised students can also act as a focal point for further radicalisation through personal contact with fellow students and through their social media activity. Where radicalisation happens off campus, the student concerned may well share his or her issues with other students. Changes in behaviour and outlook may be visible to university staff.'
- Reference to 'non-violent extremism':
 - Paragraph 19: 'This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.'

- Reference to chaplaincy support in paragraph 25, which is omitted in the Scottish guidance (in which they refer only to pastoral support.)
- Greater attention to the role between universities and student unions in the England/Wales guidance than in the Scottish guidance (a subsection within the guidance that is omitted from the Scottish guidance – paragraphs 29 and 30):
 - ‘Institutions should have regard to the duty in the context of their relationship and interactions with student unions and societies... We would expect student unions and societies to work closely with their institution and co-operate with the institutions’ policies’.

Furthermore, unlike in England and Wales, there is no single body that is responsible for monitoring the compliance of higher education institutions in Scotland. Instead, the guidance states that ‘both local multi-agency CONTEST groups and the national Prevent and CONTEST governance structures will determine how the duty is being implemented and complied with in institutions’.¹⁴

As outlined in the introduction to this report, the Prevent duty does not apply to Northern Ireland, so higher education institutions in Northern Ireland do not have a legal duty to promote free speech.

Sector regulators

The regulators in England and Wales – HEFCE for universities in England and the Higher Education Council Funding Council for Wales (HEFCW) for universities in Wales – are responsible for monitoring the implementation of the Prevent duty in the higher education sector. Both bodies have published guidance on how higher education institutions should comply with the Prevent duty and how this interacts with their duty to promote free speech. The HEFCE website gives guidance on:

- 'The Prevent duty';
- 'How to comply';
- 'Effective practice'; and
- 'Resources and support'.

The webpage is factual, outlining institutions roles and responsibilities with nothing in the way of opinions, and includes case studies of good practice. There are several documents available to support universities in complying with the duty.

HEFCE also published a blog post in December 2017, titled 'Six myths about the 'Prevent duty' in universities', in which they argue against six common myths surrounding the Prevent duty. However, they also say that they believe the Prevent duty would 'certainly benefit from fine-tuning, especially as far as 'non-violent extremism' is concerned. The HEFCW website has somewhat less information but still contains a guide to compliance with the Prevent duty.

Both HEFCE and HEFCW state that they aim to take a 'risk-based and proportionate approach' to monitoring and compliance. HEFCW further state that their approach is 'founded on the principles of safeguarding people in the higher educator sector from being drawn into terrorism and on protecting the welfare and well-being of all students and staff at risk of terrorism-related radicalisation. Radicalisation is a dynamic process; everyone is ultimately at risk of being radicalised'. Furthermore, HEFCE states that they expect universities to engage with students' unions and societies, which are not subject to the Prevent duty but are expected to cooperate with their institution. Their guidance says that institutions are responsible when an event is taking place on its site or under its branding.

Students' unions regulators

The Charities Commission regulates student unions, as charities, in England and Wales, whilst the Office of the Scottish Charities

Regulator (OSCR) regulates student unions in Scotland. Student unions are not directly subject to the same duties regarding free speech or Prevent as institutions, but must comply with charity laws. Both regulators state that charities can be involved with campaigning and political activity, within the law, if and only if it furthers their charitable purpose(s). This means that student unions can campaign for and comment on issues that directly affect the welfare on students, not on issues of more general concern. Student unions must be independent of party politics and ensure any involvement with political parties is balanced.

Endnotes

¹ The relevant Section of the Human Rights Act 1998 is available here:

<https://www.legislation.gov.uk/ukpga/1998/42/crossheading/other-rights-and-proceedings>

² The relevant Section of the Education Act 1986 is available here:

<https://www.legislation.gov.uk/ukpga/1986/61/section/43>

³ The appropriate legislation is available here:

https://www.legislation.gov.uk/ukdsi/2015/9780111133309/pdfs/ukdsiod_9780111133309_en.pdf

⁴ The Section applicable to higher education institutions is available on pages 21-24 of the above link.

⁵ The UK Government has issued two sets of statutory guidance to support the Prevent duty in both (i) England and Wales and (ii) Scotland – the first applies to specified authorities, while the second is specifically aimed at higher education institutions in each of those parts of the UK. The guidance is available here:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

⁶ This guidance is analysed in Appendix 1.

⁷ The 2018 *Spiked* Free Speech Rankings were released on 5th February and are available here: <http://www.spiked-online.com/free-speech-university-rankings#.WnYHpyOcbq0>

⁸ ‘Government consultation on behalf of the Office for Students – Guidance on registration conditions’, 19 October 2017, available at: [https://consult.education.gov.uk/higher-education/higher-education-regulatory-](https://consult.education.gov.uk/higher-education/higher-education-regulatory-framework/supporting_documents/B%20Regulatory%20Framework%20consultation%20guidance%20FINAL%202018%20October.pdf)

[framework/supporting_documents/B%20Regulatory%20Framework%20consultation%20guidance%20FINAL%202018%20October.pdf](https://consult.education.gov.uk/higher-education/higher-education-regulatory-framework/supporting_documents/B%20Regulatory%20Framework%20consultation%20guidance%20FINAL%202018%20October.pdf)

⁹ See Rajeev Syal and Rowena Mason, ‘Jo Johnson to tell universities to stop “no-platforming” speakers’, *Guardian*, 26 December 2017

(<https://www.theguardian.com/education/2017/dec/26/jo-johnson-universities-no-platforming-freedom-of-speech>)

¹⁰ The Cathedrals Group is an association of sixteen universities and university colleges with Church foundations. It is the only grouping in the UK higher education landscape based on ethical principles informed by faith-based values. More information on the Cathedrals Group can be found on its website: <http://www.cathedralsgroup.ac.uk/>

¹¹ During the initial scoping stage of this report, it was not always possible to find institutions’ free speech policies online – particularly those in Scotland and Northern Ireland.

¹² The Welsh Language Act 1993 is available here:

http://www.legislation.gov.uk/ukpga/1993/38/pdfs/ukpga_19930038_en.pdf

¹³ ‘People in Bolton’, 2011 Census Factfile No. 1: Religion, available at:

http://www.bolton.gov.uk/sites/DocumentCentre/Documents/7%20People%20in%20Bolton%202011%20Census%20Religion%20Factfile%20updated%2010_13.pdf

¹⁴ CONTEST is the name of the UK’s counter-terrorism strategy, of which the Prevent Duty forms a part.