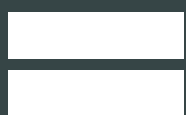




Freedom of expression:

a guide for higher
education providers
and students' unions
in Scotland



Equality and
Human Rights
Commission

Scotland

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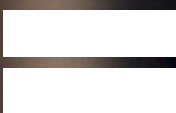
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About this guide

What is this guide about?

This guide is about what the law says on freedom of expression in Scotland, specifically in universities and other higher education environments. It provides practical advice on how to protect free speech and makes it clear to students what they should expect from their institutions. It includes:

- All current available guidance that helps to protect free speech on campus.
- Information about the relevant laws and legal issues to consider.
- Definitions for some terms associated with freedom of expression, such as ‘hate speech’, ‘trigger warnings’ and ‘no-platforming’.
- Case studies to help higher education providers and students’ unions to promote and protect free speech.

Who is it for?

This guide will be most useful for:

- governing bodies of universities and other higher education providers
- students’ union¹ trustees

It may also be of interest to others including academic staff, students’ union elected officers, individual students and speakers.

¹ Student bodies are sometimes known as students’ unions and sometimes as student associations. This guidance uses the term students’ union to refer to both.

Why have we produced it?

The right to express views and ideas freely, without fear of interference or persecution, is an essential part of democracy. Respectful debate and conversation helps us challenge discrimination, get rid of intolerance and harmful attitudes, and build strong, positive communities.

Freedom of expression is a key part of the higher education experience. Sharing ideas is crucial for learning, and allows students to think critically, challenge and engage with different perspectives. In Scotland, universities and other higher education providers have legal duties to protect free speech.

In 2018 the Joint Committee on Human Rights held an inquiry into the state of free speech in UK universities. They found that while restriction of freedom of expression was not a widespread issue, there were concerns around increased bureaucracy and potential self-censorship from students on campus as a result of the Prevent duty guidance. They also flagged intolerant attitudes and violent protest as potential obstacles to free speech, as well as potential conflict in interpretation and grey areas in some existing laws and guidance.

In May 2018, in light of these concerns, the Universities Minister called a summit for leaders in the higher education sector. They agreed that the sector should support the Equality and Human Rights Commission to develop new guidance on freedom of expression.

We have worked with organisations from the higher education sector and beyond to bring together the legal duties, risks, issues and regulation around free speech in Scotland. These organisations include the Scottish Charity Regulator (OSCR), the Scottish Public Services Ombudsman (SPSO), the National Union of Students Scotland and Universities Scotland.

These partners represent a wide range of viewpoints and do not always share the same view on all of the issues in this guide. However, they do share the core ideas set out below. We would like to thank everyone who has given their time and expertise to develop this guide.

Core ideas and key points

This guidance covers a number of issues, but approaches them all from the same five core ideas:

- Everyone has the right to free speech within the law.
- Higher education should always work to widen debate and challenge, never to narrow it.
- Any decision around speakers and events should seek to promote and protect the right to freedom of expression.
- Peaceful protest is itself a protected form of expression; however, protest should not be allowed to shut down debate or infringe the rights of others.
- Freedom of expression should not be abused for the purpose of unchallenged hatred or bigotry. Providers of higher education should always aim to encourage balanced and respectful debate.

Key points

- Everyone has the right to express and receive views and opinions, including those that may 'offend, shock or disturb others'.
- Protecting freedom of expression is a legal requirement for higher education providers. Students' unions also have a role to play, although their legal duties are different (see **section 2**).
- There are some circumstances where UK law limits the right to freedom of expression, for example, to protect national security or to prevent crime (see **section 3**).
- Most higher education providers and students' unions are registered charities and have a charitable purpose to further students' education for the public benefit. Free speech is an important aspect of meeting this purpose (see **section 3.3**).
- The starting point should be that any event can go ahead, but higher education providers have to consider their legal duties carefully (see **section 6**).

PLEASE NOTE: This guide does not replace the existing regulatory or statutory guidance relating to charity law or the Prevent duty, and readers should refer to those documents listed in **Further reading**, for an official and comprehensive guide to their legal duties.

Section 1:

Introduction

This section explains what freedom of expression is and how it applies to higher education.



1.1 What is freedom of expression?

Everyone has the right to freedom of expression. This means everyone has the right to express lawful views and opinions freely, in speech or in writing, without interference from the state or other bodies carrying out public functions, including higher education providers.² This is true even when these views or opinions may ‘offend, shock or disturb’³ others.

The European Court of Human Rights has described the right to freedom of expression as one of the ‘essential foundations of a democratic society’⁴ because it gives everyone the right to exchange information, debate ideas and express opinions, including political views. Respectful debate and conversation helps us to challenge discrimination, get rid of intolerance and harmful attitudes, and build strong, positive communities.

Freedom of expression also supports artistic, scientific and commercial development. When we talk about freedom of expression, we mean both the spoken and written word, as well as actions, gestures and the display of images intended to show meaning. In this guide, ‘freedom of expression’ also includes ‘freedom of speech’.

² See, for example, *R (Ben-Dor) v University of Southampton* [2016] EWHC 953 with respect to public universities.

³ *Delfi As v Estonia* [2014].

⁴ *Handyside v the United Kingdom* [1976].

1.2 How does it apply to higher education?

‘Higher education’ describes a wide range of organisations. It covers ‘traditional’ universities, smaller and more specialist or vocational providers, as well as students’ unions, societies and other groups that operate in a campus environment. The way each organisation is set up will determine which laws apply to it. This means that the way the law requires them to manage and protect freedom of expression varies.

This guidance sets out the legal duties for the vast majority of universities and other higher education providers (collectively Higher Education Providers or **HEPs**) and students’ unions. Students’ unions that have different legal obligations can still use the general principles outlined in this guidance to promote and protect freedom of expression.

HEPs should refer to Annex C to check which laws apply to them.

Freedom of expression is a key part of the higher education experience. Sharing ideas freely is crucial for learning and allows students to think critically, challenge and engage with different perspectives. Therefore, HEPs should encourage discussion and exchange of views on difficult and controversial issues

Higher education providers in Scotland have a legal duty to protect freedom of expression for their members, students and employees and for visiting speakers. Students’ Unions (SUs) also have an important role to play in protecting freedom of expression, but their legal duties are different.

However, freedom of expression can be limited by law if necessary, for example, to prevent crime, for national security or public safety, or to prevent unlawful discrimination and harassment.

Section 2: Freedom of expression in UK law

This section explains:

- how HEPs have to protect freedom of expression by law
- how the different legislation on freedom of expression works together, and
- how this applies to SUs.



2.1 What are the legal duties on HEPs to protect freedom of expression?

The legal obligations on HEPs in Scotland to protect freedom of expression stem primarily from the Human Rights Act 1998.⁵ If a HEP doesn't meet their legal duties, they may be taken to court.

The Human Rights Act 1998

The Human Rights Act 1998 says that all public bodies have to comply with the rights set out in the European Convention on Human Rights (ECHR).⁶ This includes Article 10, which protects the right to freedom of expression. Article 10 protects your right to hold opinions and express them freely without interference from public bodies. In connection with freedom of expression, HEPs are public bodies for the purpose of the Human Rights Act 1998.⁷

Article 10 of the European Convention on Human Rights

(1) Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. This Article shall not prevent States from requiring the licensing of broadcasting, television or cinema enterprises.

(2) The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.

⁵ Freedom of speech in Britain is also a fundamental right under the common law: *Derbyshire County Council v Times Newspapers* [1993] AC 534.

⁶ Section 6, Human Rights Act 1998.

⁷ See footnote 2.

When can Article 10 rights be restricted?

There are some reasons why restriction on freedom of expression may be allowed – they are mentioned in Article 10 (2) above. Public authorities can only restrict this right if they can show that their action is lawful⁸, necessary and proportionate (in other words, that it is appropriate and no more than necessary to address the issue) in order to protect the wider interests of society – for example, for national security or to prevent crime. If the aim could be achieved in a less restrictive way – for example, through open debate and challenge of the views being expressed – then the restriction on free speech would breach Article 10.

The courts generally say that the right to free expression should not be restricted just because other people may find it offensive or insulting. The police, the Crown Office and Procurator Fiscal Service and courts have to protect Article 10 rights when deciding whether an act or speech breaks the law. This decision usually depends on a number of factors, including the context of the speech and its purpose, as well as the actual spoken or written words.

Speech that is intended to inform rather than offend attracts greater protection, even if it could be seen as discriminatory.⁹ An intolerant point of view which offends some people is likely to be protected if it is expressed in a political speech or a public debate where different points of views are being exchanged and are open to challenge. However, speech may lose the protection of Article 10 if it is used to abuse the rights of others, for example, by inciting hatred.¹⁰ To learn more about the difference between intolerant or offensive views that are protected under Article 10, and those that are not, see our guide on **'Freedom of Expression'**.

The ECHR also includes other rights which may be relevant to situations involving freedom of expression, including:

- Article 9: right to hold and manifest a religion or belief
- Article 11: right to freedom of assembly and association, and
- Article 14: right to non-discrimination in the enjoyment of Convention rights.

Sometimes the rights of a speaker may conflict with the rights of other people affected by their views, for example, a protester's right to freedom of expression. Someone's freedom of expression may need to be limited if it would lead to a breach of another person's rights under the ECHR. To learn more, see our **guidance on ECHR rights and how they are protected**.

⁸ In this context, 'lawful' means that the restriction is prescribed by law.

⁹ *Jersild v Denmark* [1994].

¹⁰ Article 17 ECHR.

Academic freedom

Freedom of expression is relevant to but should not be confused with the important principle of academic freedom. Academic freedom relates to the intellectual independence of academics in respect of their work, including the freedom to undertake research activities, express their views, organise conferences and determine course content without interference.

In accordance with their duty under section 26 of the Further and Higher Education (Scotland) Act 2005, HEPs must aim to uphold the academic freedom of staff in their teaching and research so far as the HEP considers reasonable. As part of their duties under Article 10, HEPs must protect the freedom of expression of academics and staff. Student complaints and protests should not result in HEPs imposing limits on course content or speaker events organised by lecturers.

This could include steps such as the provision of support to their staff, where necessary to ensure the pressure of student complaints does not lead to self-censorship of academic work. HEPs must also ensure that internal policies, for example to comply with the Prevent duty, do not have the effect of inhibiting academic freedom.

2.2 Do SUs have to comply with Article 10 ECHR?

Unlike HEPs, SUs are usually independent bodies and not likely to be 'public authorities', so they are not directly required to comply with Article 10.

Section 3:

Where does
the law allow
for limitations
on freedom of
expression?

This section explains
when speech is considered
unlawful and when
restrictions on freedom of
expression may be required
or allowed.



3.1 Criminal offences

Speech can be limited if it would break criminal law. Some of the criminal offences that may occur in relation to speech include:

- aggravated offences attached to a substantive charge such as breach of the peace¹¹
- acts intended or likely to stir up hatred on grounds of race, religion or sexual orientation¹²
- speech amounting to a terrorism related offence,¹³ and
- behaving in a threatening or abusive manner which would be likely to cause a reasonable person fear or alarm.¹⁴

Annex B is a longer list of offences relating to freedom of expression.

3.2 Civil law breaches

There are some situations where civil law provides protection against offensive or harassing behaviour. These include discrimination or harassment under the Equality Act 2010. It may be that certain views are lawful to express, but are unlawful in certain contexts such as in the workplace.

Equality Act 2010

When HEPs, SUs and their clubs or societies are acting as service providers to members of the public, or associations under the Equality Act 2010,¹⁵ they may be liable for discrimination against, or harassment of, their service users, members and guests.¹⁶ This may apply when they are hosting speakers or events that are open to the public.

¹¹ For instance, the Criminal Law (Consolidation) (Scotland) Act 1995.

¹² Ss.18 and 29B of the Public Order Act 1986.

¹³ Under the Terrorism Act 2000 or Terrorism Act 2006.

¹⁴ Criminal Justice and Licensing (Scotland) Act 2010, s.38.

¹⁵ Equality Act 2010, s.29 and ss.101-102.

¹⁶ HEPs may also be liable for harassment in their role as employers and education providers under parts 5 and 6 of the Equality Act 2010.

Harassment

Harassment under the Equality Act 2010 is unwanted behaviour related to certain protected characteristics,¹⁷ which has the purpose or effect of:

- violating a person's dignity, or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Whether or not behaviour is harassment is not just based on the view of the person making the complaint. The courts consider whether it is reasonable for the behaviour to have that effect, as well as the circumstances. They have to balance competing rights, including the right to freedom of expression of the person responsible.¹⁸

The harassment provisions cannot be used to undermine academic freedom. Students' learning experience may include exposure to course material, discussions or speakers' views that they find offensive or unacceptable, and this is unlikely to be considered harassment under the Equality Act 2010.¹⁹

Also, if the subject matter of a talk is clear from material promoting an event, then people who attend are unlikely to succeed in a claim for harassment arising from views expressed by the speaker.

Views expressed in teaching, debate or discussion on matters of public interest, including political or academic communication, are therefore unlikely to be seen as harassment, even if they are deeply offensive to some of the people who are listening, as Article 10 will protect them.

¹⁷ **Annex C** sets out when the harassment provisions of the Equality Act 2010 may apply.

¹⁸ Paragraph 116 of the Explanatory Notes to the Equality Act 2010 states: 'Courts and tribunals will continue to be required to balance competing rights on the facts of a particular case; this would include consideration of the value of freedom of expression (as set out in Article 10 of the European Convention on Human Rights) and of academic freedom.'

¹⁹ See: <http://www.legislation.gov.uk/ukpga/2010/15/notes/division/3/2/2/14>.

Discrimination

HEPs, SUs and their clubs and societies must ensure they do not discriminate in the way they organise events. For an example, **see our guidance on gender segregation at events and meetings.**

In some situations, a discriminatory act may breach a person's freedom of expression as well as the Equality Act 2010.

Direct discrimination is when an individual is treated less favourably because of a protected characteristic.²⁰ For example, refusing to let female attendees ask male speakers questions would restrict their right to freedom of expression as well as directly discriminating against them on the basis of their sex.

Indirect discrimination can arise where a policy applies to everyone, but disadvantages a particular group or individual due to a protected characteristic. If this happens, the policy will not be unlawful if the person or organisation applying the policy can show that there is a good reason for it – that is, that it is 'a proportionate means of achieving a legitimate aim'.

'Hate speech'

The term 'hate speech' is widely used, but does not have any legal meaning. Generally, it describes forms of expression that incite violence, hatred or discrimination against other people and groups. Whether or not hate speech falls outside the protection of Article 10 and is unlawful depends on the context of what is said and when.

The criminal law balances the right to freedom of expression with the protection of individuals and communities from threats, abuse and harassment both on and offline. Where this line is crossed, the perpetrator may be prosecuted.

A list of the criminal offences used to prosecute offending behaviour often described as 'hate crime' is included in **Annex B**.

²⁰ See: <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>.

3.3 Charity law

A significant number of HEPs and SUs are charities and therefore must comply with charity law. For all institutions that are charities regulated by the Scottish Charity Regulator (OSCR), their trustees are responsible for ensuring that their institution complies with charity law and any other laws that apply to them.

Trustees must make sure their charity acts in ways that further its charitable purposes, and no other purposes. For most charitable HEPs and SUs, one of their charitable purposes will be to further students' education for the public benefit. They can meet this by promoting, sustaining and increasing the knowledge of students and their understanding of specific areas of study, skills and expertise.

Charitable status does not stop SUs and HEPs from organising (or supporting students to organise) debates and discussions, or other activities that encourage students to gain knowledge, learn how to debate and form views on different issues. Encouraging debate on political matters and other matters of public or academic interest can be an important part of advancing education.

To meet charity law requirements, charities advancing education must be neutral in their starting point and must not promote a particular point of view, unless in doing so they will be advancing education for the public benefit.

Separately, charities can carry out political activities – such as campaigning for a change in the law – if this furthers their charitable purposes.²¹ This could include organising debates on political issues and putting forward political resolutions for their students to vote on. However, trustees of an SU must not take steps to implement or campaign in support of such a resolution if doing so does not support their charity's purposes. SUs can campaign on political issues, such as tuition fees, if doing so supports their charitable purposes.

Furthermore, charity law does not require SUs to provide access for all external groups to their events or facilities (such as freshers' fairs) in the name of freedom of expression.

²¹ See: <https://www.oscr.org.uk/guidance-and-forms/charities-and-campaigning-on-political-issues-faqs>.

Finally, SUs can fund and support clubs or societies which have a range of political or party political views, as long as this furthers their charitable purposes, for example, by facilitating debate and discussion on political issues. SUs do not have to ensure that clubs and societies with opposing views have equal prominence, but SU funding and support in kind (i.e. access to spaces) must be made in way that is balanced and not unlawfully discriminatory.

Charity law also requires trustees of SUs to:

- provide public benefit which means ensuring that the charity's activities are focused on benefit to the public, and
- act with care and diligence, for example, by avoiding exposing the charity's assets, beneficiaries or reputation to undue risk.

To show that they are acting with care and diligence, trustees should be able to show how they have decided to mitigate any risks associated with a speaker or event when they invite speakers to attend.

Given the important role of SUs in advancing education through debate, it is important for trustees to consider any reputational harm to their charity that may arise if they prevent activities, such as planned speaker events, from going ahead, as well as the risks if they allow them to proceed.

Key issues for trustees to consider in relation to speaker events

Trustees should be clear on how hosting the speaker or event will further the purposes of the organisation.

They should also make sure that hosting a speaker or event is not likely to result in a breach of:

- criminal law
- charity law restrictions on political activities and campaigning, or
- other laws or rules that apply to the charity as this could expose its assets, beneficiaries or reputation to undue risk (for example, the risk of being sued for defamation or a breach of equality law).

Student societies

Students' union trustees must comply with their charity law obligations when making decisions about funding and support for student societies. This means that, amongst other things, they must ensure that the funds given to student societies are only used for the charitable purposes of the SU and in compliance with the law.

3.4 Duty of care

HEPs and SUs have to take steps to ensure the safety of students, members, employees and visiting speakers, for example, under their common law duty of care. Article 10 does not require HEPs to take steps to protect freedom of expression at the expense of the safety of staff, students or speakers.

For example, it would be reasonable to cancel an event if the participants would not be safe from physical harm; for instance, if there was a threat of violent protest and there was no reasonable, less restrictive option available to the HEP such as providing increased security (within reasonable cost).



Section 4: Legal duties that may interact with freedom of expression

This section explains the other legal duties HEPs need to consider in relation to freedom of expression, including the Prevent duty and the public sector equality duty.

4.1 What other legal duties do HEPs and SUs need to consider in relation to freedom of expression?

HEPs and SUs need to consider other legal duties that interact with freedom of expression, including the Prevent duty and the public sector equality duty. These do not usually require restrictions to be put on lawful speech and other forms of expression.

Prevent duty

Higher education providers²² are subject to a statutory duty to have due regard to the need to prevent people from being drawn into terrorism.²³ This is known as the Prevent duty. HEPs should refer to the statutory **Prevent Duty Guidance for Higher Education Scotland**²⁴ for guidance on how it applies to them.

HEPs must have regard to this statutory guidance when carrying out the Prevent duty²⁵, and they should be able to demonstrate how they have considered it in their decision-making. The statutory guidance sets out the considerations that HEPs should take into account but it does not require a particular decision to be made in any given case.

In carrying out the Prevent duty, the Counter-Terrorism and Security Act 2015 requires HEPs to have 'particular regard' to the need to ensure freedom of speech, and to the importance of academic freedom.²⁶ Compliance with the Prevent duty does not prevent HEPs from upholding their duty to protect freedom of speech. HEPs have to consider the Prevent duty as part of their duty under Article 10 to consider whether any restriction on the right to freedom of expression is necessary and proportionate.

²² All providers of HE are post 16 education bodies within the meaning of the Further and Higher Education (Scotland) Act 2005.

²³ Counter-Terrorism and Security Act 2015, s.26 and Schedule 6. See **Annex C**.

²⁴ See: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445921/Prevent_Duty_Guidance_For_Higher_Education__Scotland_-_Interactive.pdf.

²⁵ Counter-Terrorism and Security Act 2015, s.29(2).

²⁶ Counter-Terrorism and Security Act 2015, s.31(2).

When considering speakers who express extremist ideas, providers should be mindful that the Prevent duty and guidance are only relevant if there is a risk of people being drawn into terrorism. The guidance says that providers should consider carefully whether the views being expressed risk drawing people into terrorism and gives guidance on the type of actions that might be taken to mitigate this risk. Section 6 of this document gives some further examples of measures providers may wish to consider in order to mitigate risk. Providers can also contact their Prevent coordinators for more advice.

As SUs are usually independent bodies, the Prevent duty does not usually apply directly to them. However, all charities have to manage the risk of illegal behaviour, including terrorism or other criminal offences such as inciting racial or religious hatred. This means SUs should consider similar actions to HEPs to ensure that they are promoting freedom of speech safely in a way that manages these risks.

Aside from external speaker events, the Prevent duty guidance also includes a wider range of considerations (set out in the statutory guidance). Institutions must have regard to the duty across all of their activities; this includes training relevant HEP staff to be able to recognise vulnerability to being drawn into terrorism, and to know when to make referrals to the Channel programme.

However, HEPs should ensure that the way they comply with the duty does not lead to students or staff feeling uncomfortable expressing their political or religious views on campus.²⁷

²⁷ We have produced guidance on how universities can comply with the PSED in relation to the Prevent duty for HEPs in **England** and **Wales** only.

Public sector equality duty (PSED)

Case study

Prevent duty and freedom of expression

A risk assessment of an invited speaker has shown that they have a history of associating with violent extremists and making statements that could risk drawing people into terrorism. They have publicly distanced themselves from these comments but continue to associate with extremist groups.

In this situation, the provider needed to consider the interaction between free speech and the Prevent duty. The HEP took advice from their Prevent coordinator on how significant the risk was and how it could be reduced. Proposed measures for consideration included making sure materials given out at the event (such as leaflets) are seen in advance, or making sure the event has a strong chairperson.

If the speaker agreed to give advance sight of materials and speak alongside an individual with an alternative viewpoint, the event should be able to go ahead as planned. However, if they did not agree to this, or if no chairperson or alternative viewpoint was available, the HEP may have decided the risk is too great and cancelled or postponed the event.

In this situation, neither decision would necessarily be unlawful. It is down to the institution to justify its decision, and make clear the steps it has taken to balance its legal responsibilities.

HEPs have a statutory duty to comply with the public sector equality duty (PSED) under s.149 of the Equality Act 2010. This is a duty to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and other behaviour that is prohibited by the Equality Act 2010
- advance equal opportunities between people who share a relevant protected characteristic and people who do not, and
- encourage good relations between people who share a relevant protected characteristic and people who do not, including the need to tackle prejudice and promote understanding.

The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

This means HEPs have a legal responsibility to think about how they can promote equality and minimise tension and prejudice between different groups on campus. This is something that HEPs must consider when they are promoting freedom of expression.

For example, when a HEP is considering what steps to take to ensure a debate on a divisive topic can go ahead – to protect free speech – it must consider the potential impact on students who may feel vilified or marginalised by the views expressed. They should think about how to ensure those students feel included and welcome within the HEP environment. While the PSED requires consideration of such measures, it places a duty on HEPs to encourage good relations and it should not be used as a reason for restricting lawful free speech.

In addition, HEPs are subject to the specific equality duties. These include the duty to assess the impact on the requirements of the PSED and review policies and practices including those around free speech. HEPs have to consider their duties under the PSED as part of their duty under Article 10 to consider whether any restriction on the right to freedom of expression is necessary and proportionate.

Further information about the public sector equality duty in Scotland is available on our website.

Section 5:

How HEPs and SUs can work together on freedom of speech

SUs and HEPs serve the same student body and often have similar legal responsibilities. This section explains how they can work together to support freedom of expression.



How HEPs and SUs can work together on freedom of speech

All universities should consider having a policy on how they work with the students' union to uphold the Article 10 right. However, HEPs should ensure that their Prevent duty policies and any other policy related to freedom of speech do not create unnecessary barriers to freedom of speech.

Individual HEPs and their SUs should decide how to manage their relationship within the law and may want to work together on issues of freedom of speech and expression to ensure they meet their legal duties, for example agreeing risk management approaches, and ensuring that they understand each other's approach.

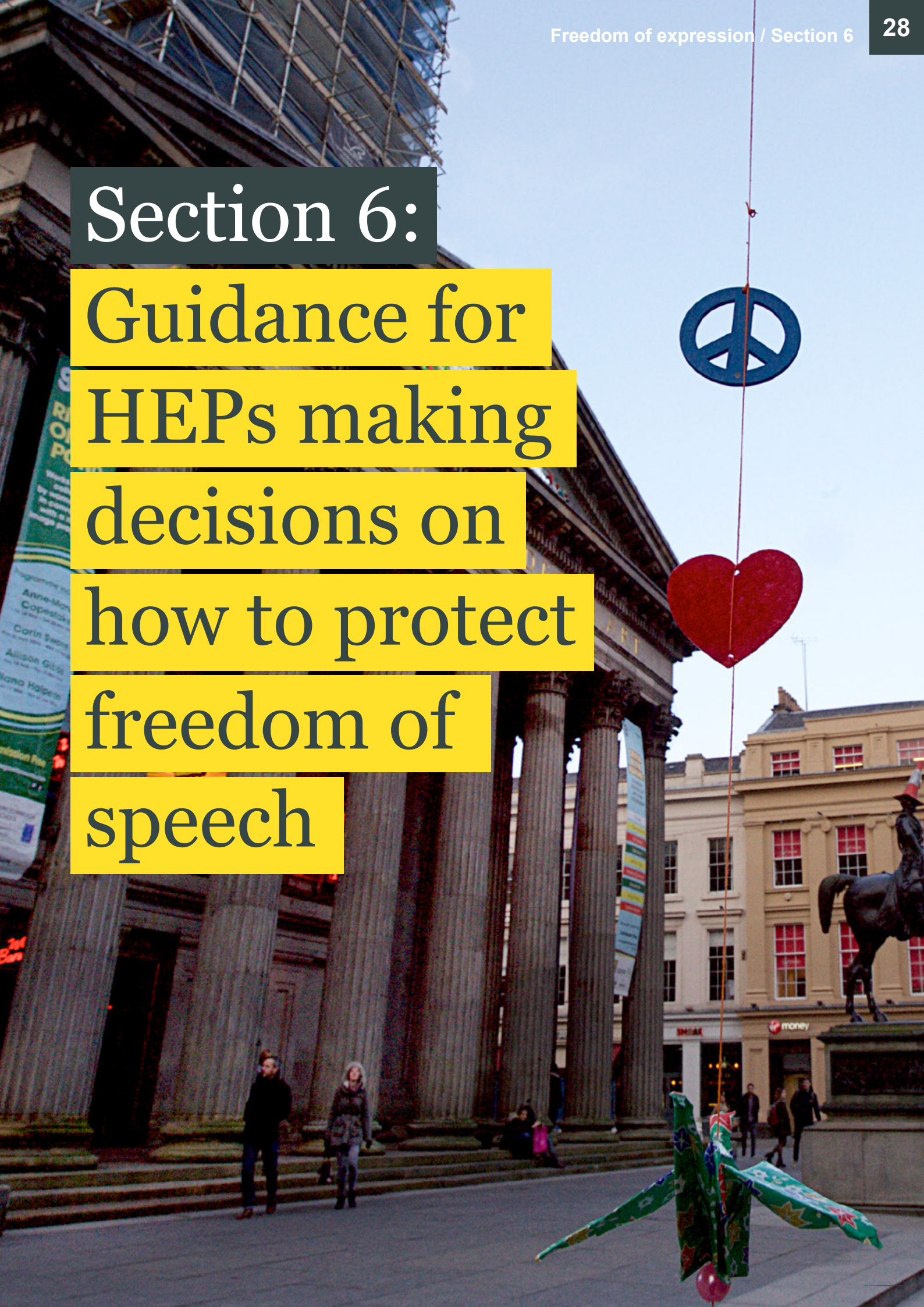
The Higher Education Policy Institute has published **guidance on creating an effective code of practice** aimed at HEPs in England and Wales, which have additional duties under the Education (No2) Act 1986, including a duty to have a Code of Practice. This duty does not apply to HEPs in Scotland but the guidance may provide useful steps for institutions here to follow. Universities UK has also published **guidance on external speakers**. Details of these are in **Further reading**.

'Freedom from harm'

NUS guidance talks about the need to balance freedom of speech with 'freedom from harm'. Freedom from harm may refer to a number of the legal duties mentioned in this guide, including an SU's duty of care and responsibilities to protect students from unlawful harassment, discrimination and hate crime.

SUs are entitled – and required, to the extent that the speech may break the law – to consider 'harm' that someone's views may cause to some of their members, when deciding whether to invite a speaker to an event they are organising.

Section 6: Guidance for HEPs making decisions on how to protect freedom of speech



Guidance for HEPs making decisions on how to promote freedom of speech

As a matter of best practice, HEPs should consider adopting a policy on freedom of expression. It could include steps to take when organising meetings or speaker events and how to deal with any questions around freedom of speech that arise.

The starting point to approach any event should be that it is able to go ahead. However, there will be some situations where HEPs need to use their judgement to balance their other legal duties.

They should only consider cancelling an event if there are no reasonable options for running it.

The questions in the following chart may help HEPs to make a decision. Often, there is no one right answer to these questions and each situation will be different. Although it will fit a number of situations, the chart does not cover everything; HEPs should consider each legal duty and make a judgement accordingly.

It may not be for one individual to answer all of these questions. For example, if the event is hosted by the SU they may follow their own process and carry out due diligence checks and risk assessments (the NUS has its own **guidance** for SUs on how to do this). However, the HEP may want to have documentation showing how, as part of their duty under Article 10, they have considered whether any restriction on the right to freedom of expression is necessary and proportionate.

1. Does the event meet my duties under charity law?

Does it further my charitable purposes? (Usually, these will include furthering students' education for the public benefit).

2. Is the speech likely to be unlawful (e.g. a criminal offence, harassment?)

Has the individual/group spoken unlawfully in the past, or indicated a likelihood of doing so? Does the topic or purpose of the event imply it will be unlawful, carefully considering the requirements of Article 10?

If yes - you determine it is likely the speech will be unlawful and the risk cannot be reduced - **there is no obligation to let the event proceed.**

If you **do not have enough evidence that unlawful speech will take place**, but still consider it a risk, you will want to consider steps to reduce the risk. **The event should proceed.**

3. Have I considered my other legal duties, including the PSED and Prevent duty?

For example, is the speech likely to risk drawing people into terrorism? Is it likely to affect good relations between groups?

If yes, you will need to consider how you can reduce these risks or impacts while allowing the event to go ahead, and record your decision.

If no, you should record how you reached the decision and why you considered there would be no risks or negative impacts.

4. Are there any other potential barriers to speech going ahead, such as security concerns about planned protests?

If so, would any restriction on the right to free speech be lawful, necessary and proportionate?

If yes, then the obligation to protect free speech and let the event proceed falls away.

If no, the event should go ahead.

When might a restriction on freedom of expression be justified?

To meet the Article 10 duty to protect freedom of expression, HEPs have to consider whether any restriction on the right to free speech is lawful, necessary and proportionate.

Promoting balanced debate and challenge at events can often reduce any legal risks as well as furthering the purpose of the PSED and Prevent duties.

It might be relevant to consider taking less restrictive measures such as:

- challenging high-risk speakers with opposing views
- having an independent chairperson to facilitate an event and make sure a range of viewpoints can be heard
- filming an event to deter the use of unlawful speech
- putting additional security in place
- ticketing an event to avoid non-student violent protest
- requesting to see any promotional materials before the event
- having a policy setting out principles of respectful discourse that speakers have to follow
- supporting and encouraging the SU and student body to host debates
- training staff on how to facilitate well-balanced debate, and
- postponing the event if necessary to enable one or more of the steps above to be taken.

Section 7:

Key questions in relation to freedom of expression

This section answers a number of questions relating to ‘no-platforming’, protest, ‘safe spaces’ and ‘trigger warnings’.

What is 'no-platforming' and is it lawful?

'No-platforming' has attracted a lot of media attention but is often misunderstood and misreported.

The NUS has a formal No Platform policy that prevents the organisations it lists, which are known to hold racist or fascist views, from speaking at NUS events. It also says that NUS officers should not take part in public events with members of these groups. The NUS National Conference decides the policy and the organisations included.

The NUS is not a charity and is not subject to the Article 10 duty to protect freedom of expression. It is free to adopt and enforce its no-platforming policy in relation to its own activities. The NUS's policy does not extend to SUs, although many SUs have adopted similar policies. These are shaped and voted on by their members, and tend to either ban proscribed groups (as required by law) and/or exclude people or organisations who are associated with 'hate speech', fascist views and/or support for violence which are likely to be unlawful.

The term 'no-platforming' is also sometimes used to describe individual decisions not to invite a certain speaker. These are not 'no-platform' policies.

Policies not to invite certain individuals or groups may be adopted by trustees, for example, to protect the reputation of the SU, the welfare of students, and to prevent funds being used for a purpose which is not in the public benefit. However, if a student group or member of staff invites a speaker from an organisation that is subject to a 'no-platform' policy and the SU, their officials or other students attempt to stop them from speaking, the HEP must consider whether any restriction on the right to freedom of expression is necessary and proportionate.

SUs should be aware that banning certain groups or named individuals could undermine the right to freedom of expression. In relation to named individuals, SUs should be cautious about the risk of liability for defamation which could place it in breach of charity law obligations by exposing its assets and reputation to risk.

Case study

An SU considers inviting a writer to debate gender equality. It has a policy of not inviting speakers who use what it calls 'hate speech'. During planning, they find out that the writer has spoken on social media about their belief that women with a Gender Recognition Certificate are still men. The SU official organising the debate decides that the writer's views amount to transphobic hate speech, and announces on Twitter that they have decided not to invite the writer. The writer complains that the SU's decision to 'no-platform' them violates their right to freedom of expression.

The writer has not yet been invited to speak, and, as there is no legal duty on the SU to invite them, there is no infringement of the writer's freedom of speech.

Can students protest events without breaching the speaker's right to freedom of expression?

Protests in higher education often occur in relation to events hosted by HEPs and SUs. The right to protest non-violently is a vital part of democratic society, and a way in which individuals can use their right to freedom of expression. Because of this, it is protected by Article 10.

For decades, HEPs have hosted a tradition of students organising rallies, holding counter-events and staging sit-ins to protest around issues they are passionate about. However, there may be occasions where through disruption, a speaker is stopped from speaking freely; HEPs should take steps to ensure this does not happen at events. HEPs may want to consider working with their student body to support peaceful protest, while making it clear that protest should not be at the expense of others' right to freedom of expression. Concerns about security and people's safety have been cited as the reason for cancelling some events in the past. While this is sometimes a valid reason for cancelling an event, the Article 10 duty requires HEPs to consider whether any restriction on the right to free speech is necessary and proportionate, and whether reasonable steps such as increasing security measures could enable the event to go ahead.

Case study

An event is organised by an atheist SU-affiliated society to debate whether God exists. Before the event, people complain that it should not go ahead because some of the group's views and campaigning materials are offensive to individuals with a religion or belief. The event happens but is interrupted by chanting and shouting from faith student activists in the audience. Those activists are eventually escorted off the premises by security and the event is postponed.

The views expressed by the speakers and protestors are lawful. But there is a need to balance the rights to freedom of expression of the members of the atheist student society by enabling the event to proceed while protecting the faith student activists' right to protest.

The HEP knew there was opposition to the event, and was under a duty to consider what would be necessary and proportionate steps to take in light of their article 10 duty to ensure the event could go ahead. This could have included providing additional security to ensure that protestors could be removed if they refused to leave or stop their protest after having a reasonable opportunity to express their views, or exploring with the society whether an event where a range of views would be expressed was a viable alternative

Where an issue causes confrontation on campus between groups of individuals who share protected characteristics, the PSED requires the HEP to consider what steps it can take to ensure atheists, for instance, feel able and safe to organise future events. The HEP should also act to promote good relations between atheist and religious students on campus.

There have also been concerns that protest can lead to harassment or intimidation of students. If the actions or views expressed by protestors break the law, then they are not protected by the Article 10 duty.

Case study

A group of students organise a protest in a public area on campus, holding banners and handing out leaflets criticising the policies of the state of Israel. During the protest a student defaces an Israeli flag with a swastika, and makes a Nazi salute.

University security officers are made aware of the protest, but decide to let it continue as nobody is threatening violence or disorder against a specific individual. Complaints are later made to the HEP that the Nazi salute and flag defacement was anti-Semitic and the protest should have been stopped to protect Jewish students from anti-Semitic hostility on campus.

Students are allowed to hand out leaflets and protest in a peaceful and lawful manner. However, the use of a Nazi salute and defacement of the flag may amount to a racially or religiously aggravated offence because of the association of the Nazis with anti-Semitism and atrocities against Jewish people, including the Holocaust.

The HEP should have decided whether the individual student's actions were linked to the wider protest. If this was the action of one individual, removing them from the protest and allowing the lawful protest to continue would probably strike the right balance under Article 10 between preventing unlawful acts and protecting free speech.

When the HEP decided whether to let the protest carry on, they should have considered what steps they should take to ensure Jewish students on campus do not feel discriminated against or harassed, and promote good relations between Jewish and non-Jewish students, to comply with the PSED.

Do HEPs have to take disciplinary action against protesters who infringe freedom of speech?

When a student group complains to a HEP that another group with opposing views is infringing their freedom of speech by, for example, conducting disruptive protests, a HEP may take disciplinary measures against the student protesters if this is appropriate.

The HEP will need to consider whether disciplinary proceedings are necessary and proportionate. Before taking disciplinary measures, they should investigate the complaint and make sure they give full respect to the protesters' right to freedom of expression while balancing that with its duty to protect lawful speech. If the protests have included unlawful actions, such as public order offences, then disciplinary action may be appropriate, as might the involvement of the police. However, disciplinary action should not be used to prevent lawful protest covered by Article 10.

The PSED should inform the HEP's decision on how to address the complaint. Even if disciplinary action is not appropriate, there may be steps the HEP can take to promote good relations between students and prevent discrimination and harassment on campus.

Some HEPs require students to sign codes of conduct that prevent them from acting in a way that affects the interests of the HEP or damages its reputation. However, a code of conduct cannot be a basis for disciplinary action against a student where a HEP considers a student protest or public statement has damaged its reputation if this interferes with the student's right to freedom of expression. Disciplinary proceedings in relation to speech should only take place if the HEP considers the speech to be unlawful. Unless the HEP can show that its actions are necessary and proportionate, it is likely that the HEP will be in breach of its Article 10 duty.

What are 'safe spaces' and are they allowed?

Some SUs have 'safe space' policies which aim to create welcoming, inclusive environments on campus and ensure that people with particular protected characteristics are free from harassment and discrimination. In some cases, safe spaces also refer to meetings of individuals sharing a protected characteristic (for instance, a women's group or LGBT+ group) open only to those who share a certain protected characteristic.

Safe spaces have been cited as a reason why freedom of expression may be restricted by SUs, although actual examples are hard to find. Creating a 'safe space' is not unlawful, but care should be taken when applying any 'blanket' policies or cross-campus rules to make sure they do not restrict freedom of expression.

Case study

A group calling itself 'Laddism Reborn' applies to the SU to be affiliated so it can have funding and use the SU facilities for its activities. The group aims to promote 'lad culture', encouraging sexist and homophobic 'banter', heavy drinking and sexual harassment of women on its promotional material (printed leaflets and social media platforms).

The SU refuses affiliation, expressing its view that the group is misogynistic. The SU cites its aim to create 'safe spaces' for all students using its zero tolerance to sexual harassment policy and equality and diversity policy, and its general commitment to student welfare. It notes that where these issues are concerned, the HEP has similar policies. The SU also refuses to allow the group to promote itself by putting leaflets in buildings or on notice boards on campus. The group states that its right to freedom of expression is being infringed.

The SU is allowed to have a policy to protect members from harassment, including on the grounds of sex. While the NUS encourages SUs to take a balanced approach to affiliating societies, an SU is justified in deciding not to approve and fund such group on the grounds that it has an obligation under charity law to use its assets for the public benefit. It can also argue that approval would not further its charitable object of promoting student welfare. Finally, Article 10 also does not require SUs to provide funds and support for any or all groups.

If the promotional material was unlawful, the HEP would have no obligation under Article 10 to let the group advertise on public noticeboards or hand out its leaflets on their premises.

The students could continue to meet as 'Laddism Reborn'. However, reputational harm may be done to the HEP, and the group members may not be protected by Article 10 if their expressed views are so offensive and discriminatory against women that disciplinary action against them becomes necessary and proportionate.

Can an SU refuse to affiliate certain societies?

There are concerns about whether refusing a particular group or society affiliation to an SU is denial of freedom of speech. This is because refusing affiliation would mean that certain student groups would not have access to the funding and resources that other groups have.

The Education Act 1994 requires SUs to have a system for allocating resources to groups or clubs which is fair, set out in writing and freely accessible to all students.

Case study

An anti-abortion group requests affiliation to its SU. The SU advises that a condition of approval is that it restricts certain types of promotional material, such as imagery likely to cause distress.

The group refuses to agree to vetting of their promotional material and the SU refuses affiliation. The group feels that its freedom of expression is being violated and complains to the HEP and, as the SU is a charity, to OSCR.

SUs have no legal obligation to affiliate every society that applies to them but its decision making must be well reasoned and justifiable. However, it is possible that members of the society seeking affiliation have a particular protected characteristic (for example, religion or belief). If that is the case, the SU will need to ensure that it is not discriminating against the society based on that protected characteristic, by refusing affiliation.

The SU might find it helpful to have a clear policy explaining its values and ethos and how these support its charitable objectives, which would demonstrate where this society does not align with them, and to carry out a careful analysis of whether not allowing the group to affiliate is the best decision.

Are SUs allowed to refuse certain groups access to freshers' fairs?

A freshers' fair is a private event and most are managed by an SU.

As good practice, an SU should make sure a wide range of views are represented at freshers' fairs, but this does not mean they have to give a platform to every view, and they are under no obligation to invite certain groups. For example, they may limit participation to groups with SU affiliation. However, if the freshers' fair is generally open to all those who are interested in having a stall and a certain group or individual has their application refused, the SU would need to consider whether the decision to refuse them access is based, for example, on the group's views or beliefs and so discriminates against them on the basis of a protected characteristic.

What are 'trigger warnings'? Is using them lawful?

Trigger warnings are used to let people know that content that some of them may find distressing or difficult is about to come up. For example, some HEPs use trigger warnings to signal that material may include scenes of or references to sexual violence. By warning event attendees about the nature of views that may be expressed, trigger warnings may help to facilitate free speech and enable balanced debate to take place without causing harassment. People who might find the views offensive or distressing can make an informed decision to stay or leave.

Although trigger warnings may prompt some students to opt out of debate or discussion, their choice does not stop discussion by those who want to attend. Event organisers should, however, think about how trigger warnings may be given without unnecessarily deterring participation.

How can individuals report a concern?

If an individual – whether staff, student or member of the public – has a concern about the actions of a HEP, the first step is to raise this with the senior management of the HEP. Individuals should be able to contact either the communications team or the office of the vice-chancellor (or equivalent HE office holder). If their response is unsatisfactory, a formal complaint can be made to the HEP.

All HEPs in Scotland are required to have a complaints procedure and can provide information about this.

If someone has a concern about the actions of an SU, the first step is to raise the issue with either the president or CEO of the SU. If their response is unsatisfactory, the individual can make a complaint to the parent HEP or, if the SU is a charity, approach OSCR.

Annex A: Regulation of HEPs and SUs in relation to freedom of speech

Regulators such as the Scottish Charity Regulator (OSCR) and other relevant organisations which carry out public functions, such as the Scottish Public Services Ombudsman, are subject to the Human Rights Act and the PSED. They must consider their obligation to protect free speech alongside other duties and rights and remember that speech that engages the public interest, particularly political comment and debate intended to inform, has high protection under Article 10.

Scottish Charity Regulator (OSCR)

Charities in Scotland are regulated by the Office of the Scottish Charity Regulator (OSCR). Scottish universities and some of their students' unions are charities.

The Scottish Charity Regulator is established under the Charities and Trustee Investment (Scotland) Act 2005 as a Non-Ministerial Department forming part of the Scottish Administration. OSCR is the registrar and regulator of all charities in Scotland. OSCR has a number of functions that are set out in the 2005 act. It will:

- determine whether bodies are charities
- keep a public register of charities
- encourage, facilitate and monitor compliance by charities with the provisions of the act
- identify and investigate apparent misconduct in the administration of charities and take remedial or protective action in relation to such misconduct, and
- give information or advice or make proposals to Scottish ministers on matters relating to OSCR's functions.

Charity law and registration in Scotland is comprehensive. This means that to be a charity in Scotland you must be registered with OSCR.

Guidance and good practice for Charity Trustees

OSCR's best practice guidance covers the legal duties of charity trustees set out in the 2005 act and offers links to sources of advice. Trustee duties include:

- acting in the interests of the charity
- operating in a manner consistent with the charity's purpose
- acting with care and diligence, and
- managing any conflict of interest between the charity and any person or organisation who appoints trustees.

Under Scottish charity law, a charity can campaign if:

- it is advancing its charitable purposes
- its governing document does not prevent the activity
- it is advancing a political party, and
- it can show it is acting in the charity's best interests.

The 2005 act states that an organisation set up to be a political party or to advancing a political party cannot become a charity.

Other OSCR guidance that applies to all charities includes:

- **Being a Charity in Scotland**
- **Campaigning on political issues FAQs**

Complaints

Scottish Public Services Ombudsman (SPSO)

The Scottish Public Services Ombudsman (SPSO) is the final stage for complaints about public services in Scotland. This includes complaints about universities. If you remain dissatisfied when you have had a final response from the university you can ask the SPSO to look at your complaint. The SPSO cannot normally look at complaints:

- where you have not gone all the way through the university's complaints handling procedure
- more than 12 months after you became aware of the matter you want to complain about, or
- that have been or are being considered in court.

The SPSO's contact details are:

Scottish Public Services Ombudsman

Bridgeside House
99 McDonald Road
Edinburgh
EH7 4NS

Their freepost address is:

FREEPOST SPSO

Freephone: **0800 377 7330**

Online contact: **www.spsso.org.uk/contact-us**

Website: **www.spsso.org.uk**

Annex B: Relevant criminal offences

Laws that place limitations on freedom of expression in Scotland include:

Public Order Act 1986:

- acts intended or likely to stir up hatred on the grounds of race (sections 18-23); religion (sections 29B-29F)

Terrorism Act 2000:

- incitement to commit acts of terrorism overseas (section 61)
- inviting support for a proscribed organisation (section 12)

Terrorism Act 2006:

- encouragement of terrorism (section 1) including the unlawful glorification of the commission or preparation of terrorism, whether in the past, the future or the present, or in general (section 2)
- dissemination of terrorist publications (section 2), and
- encouragement and dissemination of terrorist publications via the internet (section 3)

Criminal Law (Consolidation) (Scotland) Act 1995

- free-standing offences of racially aggravated harassment and racially aggravated conduct or behaviour (section 50A)
- racially aggravated harassment occurs when a person pursues “a racially-aggravated course of conduct which amounts to harassment of a person”

Criminal Justice and Licensing (Scotland) Act 2010

- threatening or abusive behaviour (section 38)
- protection from stalking (section 39)

Criminal Justice (Scotland) Act 2003

- offences aggravated by religious prejudice (section 74)

Offences (Aggravation by Prejudice) (Scotland) Act 2009

- disability (section 1)
- sexual orientation and transgender identity (section 2)

Lord Advocate’s Guidelines on Offences Aggravated by Prejudice

- the guidelines can be found at http://www.copfs.gov.uk/images/Documents/Prosecution_Policy_Guidance/Lord_Advocates_Guidelines

Annex C: HEPs and legal duties

Use this table to see which legal duties may apply to your institution. Because of the diverse range and legal nature of HEPs and changes to legislation, it is not comprehensive. If you are not sure about which duties apply to your institution, you should seek your own legal advice.

Legal duty	Higher education bodies the legal duty applies to:
Section 6 Human Rights Act 1998	<p>'Public authorities' have to comply with the European Convention on Human Rights, including Article 10.</p> <p>HEPs are 'public authorities' in connection with the promotion of freedom of expression for their students, members, employees and visiting speakers.²⁸</p>
Charity law	SUs and HEPs that are charities are subject to charity law.
Harassment under s.26 the Equality Act 2010	<p>SUs, student societies/clubs and HEPs acting as services providers (Part 3 EA 2010) or associations (Part 7 EA 2010) are prohibited from harassment related to the protected characteristics of age, disability, gender reassignment, race or sex (the protected characteristics of religion or belief and sexual orientation are not covered by the harassment provisions in these contexts).</p> <p>HEPs or SUs as employers (Part 5 EA 2010), and HEPs as education providers (Part 6 EA 2010²⁹) are prohibited from harassment related to age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.</p>

²⁸ See footnote 2.

²⁹ Under s.94(5) of the EA 2010, this applies to higher education institutions defined in s.91 Further and Higher Education Act 1992.

Legal duty**Higher education bodies the legal duty applies to:**

Direct and indirect discrimination under ss. 13 and 19 of the Equality Act 2010

Under the relevant parts of the Act noted in the harassment section above, HEPs and students' unions must not directly or indirectly discriminate when acting as service providers, associations or employers. HEPs are also prohibited from direct or indirect discrimination under the Act in their role as education providers.

Prevent duty under section 26 (1) of the Counter-Terrorism and Security Act 2015

This duty applies to 'specified authorities' listed in Schedule 6 of the Counter-Terrorism and Security Act 2015, which includes HEPs.

Public sector equality duty under section 149 of the Equality Act 2010

HEPs are 'public authorities' listed in Schedule 19 of the Equality Act 2010 and the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012, as amended and so are covered by the public sector equality duty and the specific duties.

Specific duties under the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012, as amended

Further reading

Charities and campaigning on political issues FAQs, OSCR: <https://www.oscr.org.uk/guidance-and-forms/charities-and-campaigning-on-political-issues-faqs>

Cracking the code: a practical guide for university free speech policies, The Higher Education Policy Institute: <https://www.hepi.ac.uk/2018/07/19/cracking-code-practical-guide-university-free-speech-policies/>

External speakers in higher education institutions, Universities UK: <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2013/external-speakers-in-higher-education-institutions.pdf>

Freedom of Expression Legal Framework, Equality and Human Rights Commission: <https://www.equalityhumanrights.com/en/publication-download/freedom-expression-legal-framework>

Gender segregation at events and meetings: guidance for Universities and Students' Unions, Equality and Human Rights Commission: <https://www.equalityhumanrights.com/en/publication-download/gender-segregation-events-and-meetings-guidance-universities-and-students>

Joint Committee on Human Rights Inquiry into freedom of speech in universities: <https://www.parliament.uk/business/committees/committees-a-z/joint-select/human-rights-committee/inquiries/parliament-2017/inquiry/>

Managing the risk associated with external speakers - England and Wales, NUS: <https://www.nusconnect.org.uk/learning-resources/faith-and-belief/external-speakers-guidance>

NUS guidance for Scotland on Managing the risk associated with external speakers: <https://www.nusconnect.org.uk/learning-resources/faith-and-belief/external-speakers-guidance>

Prevent Duty Guidance: for higher education institutions in Scotland, HM Government: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445921/Prevent_Duty_Guidance_For_Higher_Education__Scotlan_-_Interactive.pdf

Public sector equality duty guidance in Scotland, Equality and Human Rights Commission: <https://www.equalityhumanrights.com/en/commission-scotland/public-sector-equality-duty-scotland>

What equality law means for you as a student in further or higher education, Equality and Human Rights Commission: <https://www.equalityhumanrights.com/en/publication-download/what-equality-law-means-you-student-further-or-higher-education>

Contacts

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EASS

For advice, information or guidance on equality, discrimination or human rights issues, please contact the **Equality Advisory and Support Service**, a free and independent service.

Telephone **0808 800 0082**

Textphone **0808 800 0084**

Hours **09:00 to 19:00 (Monday to Friday)**

10:00 to 14:00 (Saturday)

Post **FREEPOST EASS HELPLINE FPN6521**

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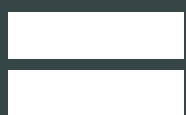
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