



AFFS' FREEDOM OF INFORMATION REQUESTS CONFIRM THAT LEADING UK UNIVERSITIES SPEND OVER £19.5 MILLION A YEAR EMPLOYING MORE THAN 500 PEOPLE IN EDI TEAMS BUT VIRTUALLY NOTHING ON FREE SPEECH COMPLIANCE

Summary

AFFS issued a Freedom of Information (“FOI”) request to over 50 UK universities to find out what they are spending on Equality Diversity and Inclusion (“EDI”) departments and what they are spending on free speech protection. The great majority responded. The results are even more stark than we anticipated.

The 47 universities which provided relevant information employ 11 EDI staff on average. The 42 which also provided the costs of EDI staff and advice spent over £19.5 million between them at an average cost of £465,000 per university a year. UCL alone spends over £1 million a year employing 23 EDI staff. Only the LSE identified any expenditure on employees with specific free speech responsibilities (£71,300) and only Essex any expenditure on outside advice about free speech (£20,186). Leading universities are currently spending about 214 times as much money on EDI as on free speech protection.

Our detailed findings are contained in the spreadsheet available via the link below. The spreadsheet contains links to the individual responses to our FOI requests and some methodological explanations. This document explains why AFFS believes that the uncontrolled expansion of university EDI departments poses a real and present threat to free speech and academic freedom and why universities need much better free speech infrastructure in order properly to comply with their existing and future legal obligations.

Universities’ abandonment of institutional neutrality

The expansion of EDI departments has led to an alarming decline of the institutional neutrality that was once the norm at universities.¹ Ideological positions about race, gender and national history which most of our universities now officially endorse have little or no basis in either science or fact because they are neither verifiable nor falsifiable. They are highly controversial, strongly contested academically and fundamentally at odds with the views of most British people. Yet senior managers at our universities have empowered their EDI departments to impose these ideologies on students and staff, including via so-called “training”.

Even where it is known to exist², some universities have declined to provide details of such training, even in response to Freedom of Information (“FOI”) requests.³ Information provided by whistle-blowers about its content has, though, led to public concern and press criticism.⁴

English and Welsh universities are subject to specific statutory duties to protect free speech and academic freedom.⁵ Under the **Human Rights Act 1998** (whose provisions apply to all UK universities), compelled speech is unlawful,⁶ and free speech in the academic setting enjoys enhanced protection.⁷ Various philosophical beliefs at odds with those officially endorsed by our universities are (or seem almost certain to be) protected under the **Equality Act 2010** (which is also applicable to all UK universities).⁸ Universities must avoid discriminating against and harassing people with those beliefs. EDI training which requires people to endorse views with which they don't agree or which results in a hostile atmosphere for those who dissent is, therefore, highly likely to be unlawful. Nonetheless, often-compulsory, EDI training continues to exist and to encourage (and sometimes require) students and staff to agree with the ideological opinions being pushed. Passing such training can sometimes be a condition of being permitted to study or to work at our universities.

Relationships with external campaign groups and institutional capture

Like many other public institutions, our universities are now working hand in glove with external campaign groups such as Stonewall⁹ and Advance HE¹⁰ and actively seek the various forms of accreditation on offer from them.¹¹ University managers appear unconcerned that these organisations promote ideological agendas or that Stonewall also seeks to stifle debate of widely contested issues, including via formal “no debate” policies. As well as being intolerant and illiberal, the promotion of such agendas is likely to be contrary to universities' own rules and, in many cases, probably unlawful.

Institutional capture by lobbyists is currently so extensive, that the EDI staff recruited by universities appear either oblivious to or heedless of existing free speech protections.

For example, a document called “*Tackling Racism on Campus Assets*” published by Advance HE in March 2021 was paid for by the Scottish Further and Higher Education Funding Council and drafted by a Steering Group which included EDI managers at **Glasgow, St Andrews, Edinburgh and Heriot-Watt Universities** with the “*overwhelming support*” of their respective Principals.¹² It uncritically advocated the controversial and contested “*anti-racism*” aspect of Critical Race Theory. Among categories of university staff and students criticised were those said to display “*White Indifference*” (itself said to be but one step away from “*White Supremacy*”). According to the report, such obviously objectionable people can be identified because they are: “*Passionate defenders of western universalism, academic freedom and the right to offend*”.¹³

In common with public bodies like the BBC, Ofsted, Channel 4, the EHRC, the CPS, the Cabinet Office and other government departments, increasing numbers of universities are waking up to the dangers of unhealthy relationships with controversial lobbyists like Stonewall and exiting from them. In England, **UCL and LSE** have led the way. In Scotland, **Edinburgh, Glasgow and St Andrews Universities** have declined to renew their participation one or other of Stonewall's schemes. Other universities urgently need to follow suit. Most, however, continue to have some association with Stonewall and some are doubling down. For instance, despite having its relationship with Stonewall criticised by a senior barrister in a report it commissioned into the cancellation of two external speakers in 2019 and 2020¹⁴, **Essex**

University declined to adopt the report's recommendation about the need to reform its relationship with Stonewall¹⁵ and continues to celebrate its Stonewall accreditation.¹⁶

Consequences for free speech

Universities' abandonment of institutional neutrality about contested ideas has led to the suppression of the free expression of lawful opinions at odds with EDI agendas, the cancellation of events and has had severe consequences for people who dissent. All this at institutions whose role should be to encourage diversity of viewpoint and wide debate. In such an atmosphere, self-censorship and public adherence to officially sanctioned dogma, while understandable, is disturbingly commonplace. Both those in charge of universities and those employed in their EDI departments continue, however, to deny the existence of any free speech problem. At best, this is complacent. At worst, it is disingenuous. In the short period it has been in existence, AFS has encountered serious free speech compliance failures and raised concerns about the lack of institutional neutrality with numerous universities.

For example:

- When Dr Helen Joyce was invited to speak at **Gonville & Caius College, Cambridge** its senior leaders criticised her invitation, describing her views as "*hateful to our community*". Cambridge's Sociology Department then apologised for even sharing information about the event.¹⁷
- At **Oxford University** Professor Kathleen Stock, a gender-critical philosopher who was hounded out of her job at **Sussex University** by trans activists¹⁸, needed security in order to speak at the Oxford Union and had her participation disrupted by extremists.¹⁹
- Following baseless complaints of Islamophobia by students associated with its Islamic Society about his viewpoints and the contents of a course he had taught for many years, **Bristol University** failed to take any effective action to protect human rights expert Professor Steven Greer from a terrifying social media campaign conducted in breach of its own rules. Bristol then cancelled Professor Greer's course even though it had entirely exonerated him of any wrong.²⁰
- An academic who criticised **Edinburgh University's** decision to cancel Enlightenment philosopher David Hume was subject to a campaign of harassment by student activists, which the University failed to stop.²¹ Other staff and student activists at Edinburgh have twice physically prevented the screening the documentary "*Adult Human Female*" on campus. The University did nothing to stop this unlawful interference with the free speech rights of its members and has, so far, done nothing effective to ensure the event can go ahead without further disruption.²²
- Despite the debacle involving Professor Stock, **Sussex University** has appointed its head of EDI as its new lead on free speech,²³ notwithstanding the continued presence on its EDI website of inflammatory and abusive material castigating those who lawfully hold contrary opinions.²⁴

- **St Andrews University** sees no institutional neutrality issue with having the Chair of Stonewall and the Chief Executive of Advance HE among the few external members of its highest governing body.²⁵ Like Sussex, it appears to regard freedom of speech as no more than another facet of EDI.²⁶
- At **Durham University**, it is reported that academics are afraid to voice dissent from its thoroughgoing and official agenda of “decolonisation” of its curricula.²⁷

Regulatory response to free speech problems

The free speech problems at our universities meant that, as recently as December 2022, the Office for Students (“OfS”) found it necessary to issue lengthy new guidance to universities about “*Freedom to question, challenge and debate*”.²⁸ Among many important points, the OfS pointedly made clear that the obligation to secure free speech: “*is likely to entail a wide range of steps needing to be taken in practice. In our view, it is unlikely to be sufficient for a university only to make public statements in favour of free speech*”.

The OfS’s guidance came in advance of the new **Higher Education (Freedom of Speech) Act 2023**. This legislation is only applicable in England but:

- reinforces universities’ existing obligation to take all reasonably practical steps to secure freedom of speech and enlarges it to include academic freedom;
- imposes a new statutory duty on universities’ governing bodies to promote freedom of speech and academic freedom; and
- introduces both a formal free speech complaints scheme (to be overseen by the OfS and a new Director of Freedom of Speech and Academic Freedom) and the right to bring civil proceedings for free speech infringements.

The new obligations will also apply to constituent bodies (such as Oxbridge colleges) and, for the first time, to students’ unions.

If, as many Vice-Chancellors continue to maintain, there is no free speech problem at our universities, there will be no complaints, nothing for the OfS and the new Director to do and no court proceedings. AFFS believes that is very unlikely to be the case and has already found it necessary to file formal complaints about free speech failures with the OfS. AFFS’s sister project, Best Free Speech Practice (“BFSP”)²⁹, has issued various briefing papers about both the new requirements for universities and students’ unions and several specific areas of concern³⁰, and is developing a comprehensive Statement of Best Free Speech Practice.

AFFS’ Freedom of Information requests

Following our earlier FOI request for St Andrews’ comparative spending on EDI and Free Speech³¹, AFFS decided to ask other universities for similar information. At the end of March 2023, AFFS sent the same FOI request³² to a further 50 universities selected largely from a recent Guardian Good University List. We asked for:

- the numbers of staff with EDI and Free Speech responsibilities; and
- the internal and external costs in the current year of employing such staff or buying in external advice and training.

We have prepared a detailed spreadsheet of the universities' responses, which can be found [here](#) and includes links to all responses we received up to 31 August 2023.

Universities reacted in a variety of ways to our requests for information. Some provided straightforward responses while others only answered some questions or sought further clarification before responding. There were instances of obfuscation³³, but ultimately most universities provided the information we requested. A few universities refused to share what seemed to be readily available information.³⁴ One, **Essex**, sought belatedly to treat 17 identified senior managers with what it called "*leadership responsibility*" relating to free speech and academic freedom as therefore employed in free speech focused roles and purported to identify their aggregate combined salaries of £2.7 million as relevant free speech expenditure.³⁵ Only one, **Oxford Brooks**, failed substantively to respond to AFFS' FOI request.

These variable responses from the universities have, to some degree, influenced the results of our survey. Consequently, despite a few striking instances of particularly high expenditure³⁶, we are cautious about overly emphasising the relative performance of individual universities. Their differing approaches could have been significantly impacted by how they interpreted and responded to our FOI requests.

Nonetheless, AFFS is confident that the survey's results offer a reliable comparative overview of universities' spending on EDI, and on free speech.

AFFS expected a discrepancy between staff and expenditure for EDI and for freedom of speech compliance, but the results exceeded our worst expectations. In summary, and based on the incomplete (and likely understated)³⁷ information provided by universities in response to our FOI requests:

- The 47 universities which provided any relevant information between them employed **515 people** with EDI responsibilities, an average of **11 people per university**.
- The 42 universities which provided any relevant information spent over **£17.9 million** on EDI staff between them, an average of almost **£427,000 per university**.
- Of those 42, the 33 universities which provided any information about external expenditure on EDI spent an additional almost **£1.6 million** between them on this, raising average expenditure to **£465,000**.
- Of the 43 universities which provided any relevant information, 41 did not identify anyone with specific responsibility for promoting and/or securing freedom of speech. The remaining two between them employed not more than **5 people**.

- Of those 43 universities, only **LSE** identified any expenditure (**£71,300**) on employing anyone with responsibility for free speech.
- Of the 27 universities which provided any information on external advice and materials relating to free speech matters only **Essex** identified any external expenditure (**£20,186**).

Overall, therefore, about **214 times as much** money appears to be being spent on EDI as on free speech protection.

Implications and proposals for improvement

AFFS believes that free speech compliance at our universities is vitally, and increasingly, important. However, the fact that universities employ virtually no-one to ensure compliance with their relevant obligations suggests that they are not serious about free speech protection. Contrary to the stated expectations of the OfS, universities appear to be doing little more than paying lip-service to their statutory duties while continuing to fail to comply with them. This is entirely consistent with AFFS' correspondence with university leaders and external trustees, which has left us with the strong impression that universities have deficient understanding of the nature and extent of their obligations and have other priorities. Managers show little inclination to confront staff or student activists. They neither take the action required to protect free speech nor have the right policies, rules, and procedures in place to enable prompt and firm action when problems arise. As a result, universities' governing bodies are failing to comply with their existing legal obligations and seem unlikely to comply with their enhanced future obligations without a significant change of attitude.

Notwithstanding the increased scope for legal compulsion introduced (albeit only in England) under the new legislation, AFFS believes that matters are unlikely to improve without a change of culture. This requires action from the top. A return to institutional neutrality would contribute very significantly to bringing the necessary cultural change about. It should, for a start, lead both to withdrawal from current unhealthy relationships with external campaign groups and to an immediate and drastic reduction in the numbers of EDI personnel whose activities are causing serious free speech compliance issues at our universities. As things are, AFFS believes that by persisting in endorsing disputed and contentious ideological views, and then imposing them on staff and students through their EDI departments, universities are not complying with their obligations under both university-specific legislation and relevant equalities and human rights laws.

The same obligations surely require universities to appoint properly empowered freedom of speech officers, entirely independent of EDI departments. It is difficult to see how such officers could or would permit EDI departments to continue to behave in the way they presently are.

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¹ See, most famously, the Kalven Report:
https://provost.uchicago.edu/sites/default/files/documents/reports/KalvenRprt_0.pdf.

See also, and more recently, the Chicago Principles: <https://freeexpression.uchicago.edu/>

² E.g. at **Kent** and **St Andrews Universities**.

³ Responses to FOI requests AFFS has made of **Kent** and **St Andrews** can be read on its website. Kent recently abandoned its refusal to provide the information requested following AFFS' complaint to the Information Commissioner. AFFS is referring St Andrews' refusal to disclose its own controversial training materials developed with and/or purchased from third party vendors to the Scottish Information Commissioner.

⁴ See: <https://www.dailymail.co.uk/news/article-10048411/Students-St-Andrews-told-pass-diversity-consent-modules-start.html>; <https://www.thetimes.co.uk/article/pass-bias-test-to-enter-st-andrews-rgvcgxlx3>; and <https://www.thetimes.co.uk/article/the-times-view-on-the-bias-test-at-st-andrews-university-beyond-all-reason-md3jf5lv8> (St Andrews); and <https://www.telegraph.co.uk/news/2021/09/27/wearing-second-hand-clothes-example-white-privilege/> (Kent).

⁵ Under **Section 43(1)** of the **Education Act (No.2) 1986**; and soon under **the Higher Education (Freedom of Speech) Act 2023**, in respect of English institutions only.

⁶ See, for example: *Buscarini and others v. San Marino* App. No. 24645/94 (1999).

⁷ See, for example: *Asku v. Turkey* (2013) 56 EHRR 4; and *Sorguc v. Turkey* App. No. 17089/03 (2009).

⁸ See, for example:

https://assets.publishing.service.gov.uk/media/60c1cce1d3bf7f4bd9814e39/Maya_Forstater_v_CGD_Europe_and_others_UKEAT0105_20_JOI.pdf.

Further, in May 2023, the Department for Work and Pensions paid Anna Thomas £100,000 just before a case came to the Employment Tribunal which involved her claiming discrimination for being dismissed following whistleblowing complaints voicing her concerns that the DWP's adoption of aspects of Critical Race Theory. Ms Thomas alleged that the distribution of materials asking white employees to "assume" they were racist, was a breach of the Civil Service Code's requirement of political impartiality and could lead to discrimination against white people. Belief in Scottish independence can also count as a protected belief (*McEleny v Ministry of Defence, ET, 2019*). So surely, can carefully thought-through

viewpoints both for and against Brexit. Other, similar, claims are pending. The list seems likely to continue to grow.

⁹ Universities often first became associated with Stonewall at a time when it was a highly successful lobbyist for gay rights. More recently, however, and following the departure of some of its founder members, Stonewall has taken up highly contested forms of trans activism, adopting an official policy that there should be “no debate” about them (<https://www.stonewall.org.uk/node/100426>). Endorsement of this agenda is now required of universities who participate (for a fee) in its Diversity Champions Programme or who seek accreditation through its Workplace Equality Index.

¹⁰ Universities appear to have become involved with Advance HE and, more particularly its Athena Swan Awards scheme, at a time when the focussed on improving the status and careers of female academics. As with Stonewall, however, Advance HE has since started to advocate much more controversial and contested positions based on its uncritical acceptance of trans ideology (https://s3.eu-west-2.amazonaws.com/assets.creode.advancehe-document-manager/documents/advance-he/Trans_staff%20and%20students_HE_guidance_1655287866.pdf), aspects of Critical Race Theory (see: <https://www.advance-he.ac.uk/anti-racist-curriculum-project#overview>) and the supposed need to decolonise university curricula (see: <https://www.advance-he.ac.uk/sites/default/files/2021-10/ARC%20Explained.pdf>).

¹¹ Like many other public bodies and companies, universities jockey with other employers for a high position in Stonewall’s Workplace Equality Index.

Some universities employ EDI staff whose sole role appears to be to make applications for EDI-related Awards e.g. according to information it provided pursuant to an AFFS FOI, **St Andrews** employs two dedicated “Awards Advisers” and an assistant. University Court member, Professor Catherine O’Leary, is identified as Athena Swan Institutional Chair, working with the EDI team to prepare its Silver Award application (<https://www.st-andrews.ac.uk/about/governance/court/members/>). These employees are clearly having an effect according to St Andrews’ dedicated Athena Swan awards page: https://www.st-andrews.ac.uk/hr/edi/sex_gender/athenaswansupport/. Somewhat ironically, the only department so far to achieve the most coveted Gold Award is Biology which has its own extensive EDI website (<https://biology.st-andrews.ac.uk/edi/>), and a, 26-strong EDI committee, led by, Anti-Racism advocate, Professor Kevin Lala. Professor Lala’s, October 2022, lecture on “Racism in Biology” (see <https://biology.st-andrews.ac.uk/edi/anti-racism/>) appears to have been archived since AFFS expressed concerns about it. It can, though, still be viewed via the link in footnote 9 to the letter referred to in footnote 25 below.

¹² https://s3.eu-west-2.amazonaws.com/assets.creode.advancehe-document-manager/documents/advance-he/Tackling%20Racism%20on%20Campus%20Assets%20Utilisation%20Guide_1616057561.pdf

¹³ See: the table on page 10. It is alarming that the EDI experts responsible for the report appear to have been either ignorant of, or unconcerned by, the fact that the free speech right to offend is specifically established by both European and English human rights case law, see e.g. *Handyside v the UK*, App. No. 5493/72 (1976). <https://hudoc.echr.coe.int/eng#%7B%22dmdocnumber%22:%5B%22695376%22%2C%22itemid%22:%5B%22001-57499%22%5D%7D>.

¹⁴

<https://www.essex.ac.uk/-/media/documents/review/events-review-report-university-of-essex-september-2021.pdf>

Attempts to require Essex to issue an unredacted version of the Reindorf Report are ongoing.

¹⁵ See: Recommendation 28 on page 86 and Essex's response here:

<https://www.essex.ac.uk/-/media/documents/review/actions-that-will-be-taken-in-response-to-the-recommendations-contained-in-the-reindorf-report.pdf>

¹⁶ <https://www.essex.ac.uk/blog/posts/2023/02/17/stonewall-reaffirms-our-commitment-to-inclusion>

¹⁷ AFFS has written to the Master, the Head of the Sociology Department, the College's governing Council and the University about these events. All to no avail. We have also reported the University's and the College's failures to the OfS.

[Caius Master letter 26.10.22](#)

[Cambridge Sociology letter 27.1.23](#)

[Caius council letter 7.12.22](#)

[Cambridge council letter 17.11.22](#)

[Letter to OfS and EHRC re Cambridge](#)

¹⁸ See: <https://www.theguardian.com/world/2021/oct/28/sussex-professor-kathleen-stock-resigns-after-transgender-rights-row>

¹⁹ <https://www.theguardian.com/society/2023/may/30/trans-activists-disrupt-kathleen-stock-speech-at-oxford-union>

²⁰ See AFFS's letter to Bristol dated 11 April 2023 and its subsequent letter to the OfS and the EHRC.

[AFFS letter to Bristol 11.4.23](#)

[AFFS letter to OfS and EHRC re Bristol](#)

Bristol's failure to take any action to enforce its own rules in defence of Professor Greer goes to the heart of the free speech issues at universities. Many are supine in the face of gross breaches of their own rules, with the clear implication that they don't understand or don't care about their legal obligations, or are frightened of the activists, or basically agree with them, or are too busy with other responsibilities to take the action they should be taking – or a combination of the above. A key problem is that, at best, very few of them have any individual with the designated responsibility, and the focus, time, seniority, powers, motivation and lack of conflicting responsibilities, necessary to take the lead on discharging universities' legal duty to secure free speech.

²¹ <https://www.edinburghnews.scotsman.com/education/edinburgh-university-lecturer-falsely-called-a-racist-returns-to-work-3394234>

²² Even though AFFS has repeatedly raised the free speech compliance issues arising from these events with both Edinburgh's most senior managers and with the Senior Lay Member of Edinburgh's Court (see: AFFS' letters to Edinburgh dated 21 December 2022, 27 February 2023, 2 May 2023 and 16

May 2023 all linked below) no effective action has been taken either to hold those responsible to account or to ensure that this lawful event can take place without further disruption.

[AFFS letter to University of Edinburgh 21.12.22](#)

[AFFS letter to Janet Legrand KC \(Hon\) Senior Lay Member of Court University of Edinburgh 27.2.23](#)

[AFFS letter to Janet Legrand KC and Court members 2.5.23](#)

[AFFS letter to Janet Legrand KC and Court members 16.5.23](#)

²³ <https://www.sussex.ac.uk/broadcast/read/59837>

AFFS worries that this is only the start of a trend by which our universities, faced with firmer free speech regulation, will seek to treat what are overarching and independent free speech obligations as somehow inextricably tied to, or subordinate to, EDI initiatives notwithstanding that the ideologies which EDI departments seek to impose and which universities officially adopt are plainly controversial and contested.

²⁴ See: AFFS' letter to Sussex dated 10 February 2023 (including footnote 12 on page 4). AFFS has also taken these issues up with Sussex's external trustees. They seem as unconcerned about them as Sussex's Vice-Chancellor.

[AFFS letter to Vice Chancellor](#)

[AFFS letter to Chair and Vice Chair](#)

²⁵ [See: AFFS' letter to St Andrews dated 21 February 2023.](#)

²⁶ **St Andrews** presently has no freedom of speech or academic freedom code but says it intends to include free speech principles within a new "*Diversity Action Plan*" being drafted by its EDI department (see letter referred to in footnote 25 above).

²⁷ <https://www.dailymail.co.uk/news/article-12366677/Durham-University-encourages-academics-decolonise-degree-courses-staff-given-woke-toolkit-aimed-riding-lessons-non-inclusive-content.html>.

As also reported (<https://www.telegraph.co.uk/news/2022/04/09/decolonise-maths-subtracting-white-male-viewpoint-urges-durham>), Durham's mathematicians are especially keen on decolonisation:

<https://www.durham.ac.uk/departments/academic/mathematical-sciences/equality-diversity--inclusion/decolonisation/>; as, apparently, are: its theologians

<https://www.durham.ac.uk/departments/academic/common-awards/policies-processes/curriculum/decolonisation/>; its philosophers

(<https://www.durham.ac.uk/departments/academic/philosophy/about-us/equality-diversity-and-inclusion/>); its musicians (<https://www.durham.ac.uk/departments/academic/music/about-us/equality-diversity-and-inclusion/>); and its historians

(<https://www.durham.ac.uk/departments/academic/history/about-us/diversity/decolonising-history/>)

Given that it is reported that academics are afraid voice dissent from this agenda, AFFS has written to Durham about the legal and compliance free speech risks of and enforcing such policies.

[AFFS letter to Durham re decolonisation](#)

²⁸ <https://www.officeforstudents.org.uk/media/8a032d0f-ed24-4a10-b254-c1d9bfcfe8b5/insight-brief-16-freedom-to-question-challenge-and-debate.pdf>

²⁹ For further information about BFSP, see: <https://bfsp.uk/>.

³⁰ BSFP has so far produced Briefing Notes for universities about:

- (1) Philosophical beliefs protected under the Equality Act: <https://bfsp.uk/wp-content/uploads/2023/06/BFSP-Statement-re-Eq-Act-and-Forstater-case-26.6.23.pdf>
- (2) Free Speech Protection at English Universities post the 2023 Act: <https://bfsp.uk/wp-content/uploads/2023/07/BFSP-short-statement-free-speech-protection-at-Engl-unis-19.7.23.pdf>
- (3) Free speech protection by Students' Unions of English universities: <https://bfsp.uk/wp-content/uploads/2023/06/BFSP-short-statement-SUs-free-speech-protection-26.6.23.pdf>
- (4) Free Speech Governance, Officers and Reporting: Requirements for English Institutions: <https://bfsp.uk/wp-content/uploads/2023/06/BFSP-re-Free-Speech-Officer-26.6.23.pdf>
- (5) "Decolonising the curriculum": Free speech compliance risks for English universities: <https://bfsp.uk/wp-content/uploads/2023/06/BFSP-statement-re-decolonising-the-curriculum-28.6.23.pdf>
- (6) Minimum requirements for staff and student behaviour: <https://bfsp.uk/wp-content/uploads/2023/01/BFSP-Minimum-Requirements-for-Staff-Student-Behaviour.pdf>
- (7) Introductory courses, training and tests for students: <https://bfsp.uk/wp-content/uploads/2023/06/BFSP-re-compulsory-EDI-training-and-free-speech-27.6.23.pdf>

³¹ St Andrews' answer generated significant press interest. See: an article in the Sunday Times of 23 April 2023 titled "St Andrews University criticised for spending on diversity staff" (available on its website) and this article in the Herald <https://www.heraldscotland.com/politics/viewpoint/23474816.235k-year-equality-diversity-free-speech/>

³² [AFFS Freedom of Information Questions.](#)

³³ E.g. **Imperial College London**, who initially asserted that AFFS' requests were "*vexatious*" but, once we had explained to its FOI Department why that was legally untenable and said we would refer its initial response to the Information Commissioner, revealed that: it employed 15 EDI staff at a cost of over £700,000, spent over £57,000 on Stonewall and Athena Swan memberships and an additional almost £32,000 on external EDI training, but spent nothing and employed no one to secure compliance with its freedom of speech obligations: <https://affs.uk/wp-content/uploads/2023/09/Imperial.pdf>.

³⁴ E.g. a number, including **Birmingham University**, maintained that it would take more than the maximum limit of 18 hours required under FOI legislation to gather the information requested, while **Durham University** maintained that it did not hold relevant information "to this level of detail" (<https://affs.uk/wp-content/uploads/2023/09/Durham.pdf>) despite its, 10-person, EDI team being separately identified on its website: <https://www.durham.ac.uk/about-us/professional-services/equality-diversity-inclusion/our-people/>

³⁵ In response to AFFS's request that it identify people wholly or partly employed in relation to promoting and/or securing freedom of speech and academic freedom (i.e. the free speech equivalents of those specifically employed in relation to EDI), **Essex University** (having repeatedly put off doing so) finally replied on 31 August, saying that the promotion and/or securing of free speech and academic freedom was "*the responsibility of all staff*" and identified 17 senior members of staff (including its Vice Chancellor, Deputy Vice-Chancellor, Registrar and Secretary, Director of Finance Planning, the

Executive Deans of its Social Science, Arts and Humanities and Science and Health Faculties and its Director or Inclusion) as having “*leadership responsibility that relates directly to this area of work*”. This appears not to address the thrust of our question, which is whether promoting and/or securing free speech is part of the specific duties of the officer concerned (i.e. likely part of their job specification) in respect of which the officer actually spends a material proportion of their time, rather than having it as a generic responsibility along with all other staff. Essex then identified what appears to be simply the aggregate salaries of all these senior staff (£2.7m) as relevant expenditure on free speech equivalent to its expenditure of over £500,000 on its EDI department.

AFFS will be writing to Essex to seek clarification of the correct numbers and figures, and will, of course, readily revise its spreadsheet to include such numbers and amounts (if any) as Essex confirms are correct in this context. Pending such confirmation, however, the £2.7m Essex spent on these 17 senior managers’ total salaries is not included in our spreadsheet in respect either of their general managerial responsibility for free speech or in respect of the general managerial responsibility they are also said to have for EDI in Essex’s response.

³⁶ E.g. **Lancaster University** spent over £800,000 employing no fewer than 26 EDI staff, **City University** spent almost £875,000 on 17 EDI staff and **UCL** over £1 million employing 23.

³⁷ The global figures seem bound to understate the true numbers of staff employed by and total EDI spending at universities, given that: (1) the most common forms of incompleteness were either a failure to provide any relevant information at all or providing no figure of spending on external EDI input (2) for Oxbridge, we only obtained information for the central administrations of the universities and not, in addition, for separate Colleges, and (3) the figures given do not include any costs associated with providing office space and equipment to EDI departments.