THE UNIVERSITY of EDINBURGH

Strengthening Academic Freedom and Freedom of Expression at the University of Edinburgh

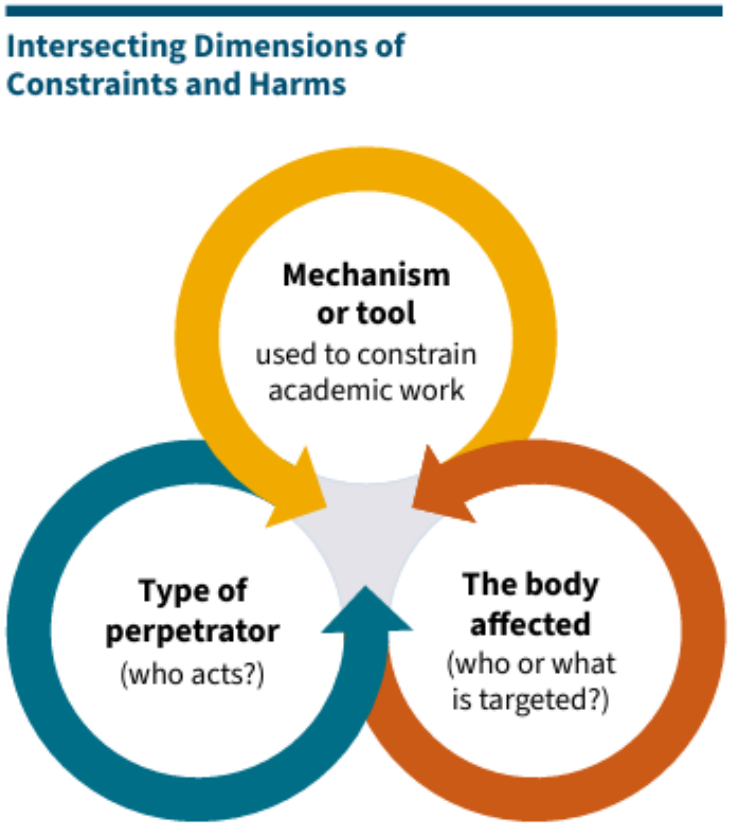
A Business-as-Usual Governance Framework | D. Smith, 2026

Academic Freedom and Freedom of Expression Working Group

Introduction

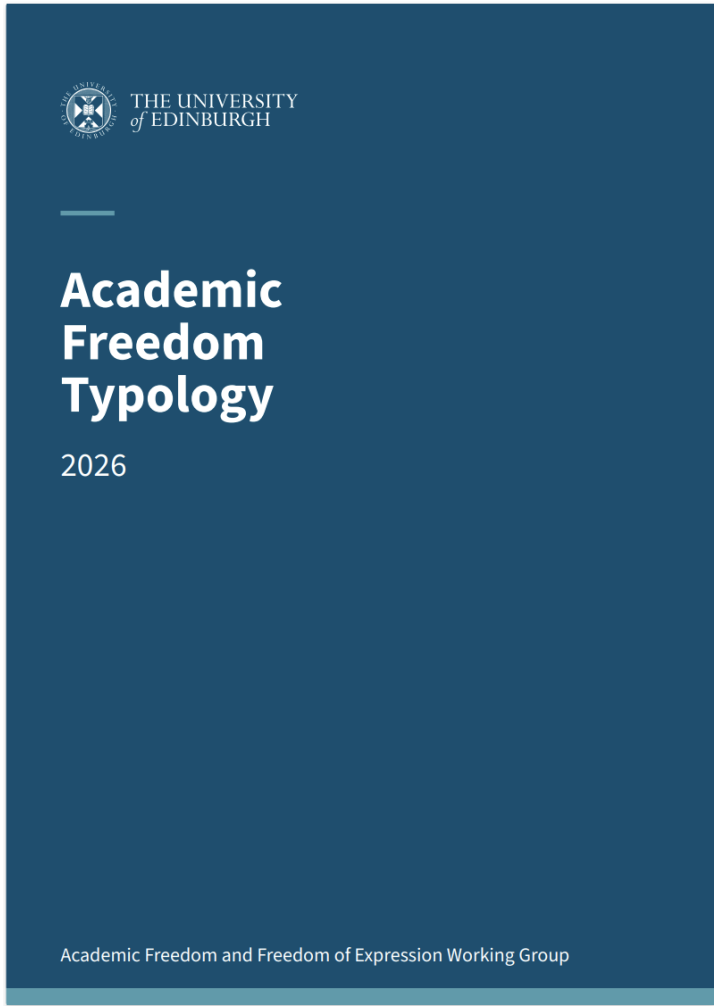
- This framework provides a structured approach to identifying, evaluating, and responding proportionately to emerging risks to academic freedom and freedom of expression.
- It embeds these activities within existing University governance arrangements and draws upon horizon-scanning and institutional evidence to support informed judgement.
- The Framework recognises disagreement and lawful expression as ordinary features of academic life, while unjustified restrictions require institutional attention.
- In doing so, it establishes an anticipatory, business-as-usual, pro-active approach to strengthening academic freedom and freedom of expression at the University of Edinburgh.

Academic Freedom 2023–2025: Typology, Patterns, Signals

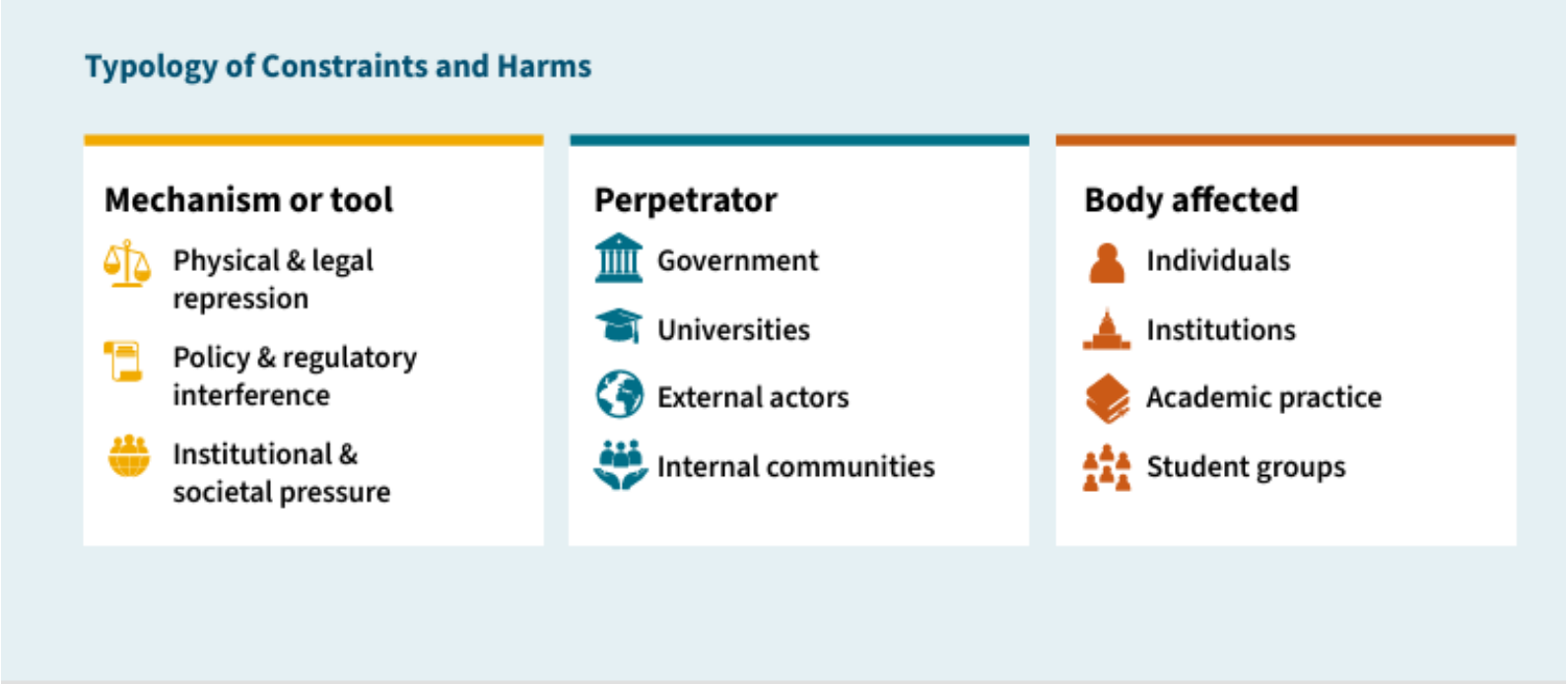


- **Research** carried out by Jakub Babuska – guided by and explored with the workstream team
- **Comparative scan** of incidents across UK, Ireland, Netherlands, Australia, Canada, USA
- **Uniform sources:** Times Higher Education, University World News, Scholars at Risk Free to Think
- **Two stage method:** incident harvesting and typology coding
- **Incident log** to avoid over-generalisation from 125 cases
- **50 page research report** and developed Typology

Output: Academic Freedom Typology 2026

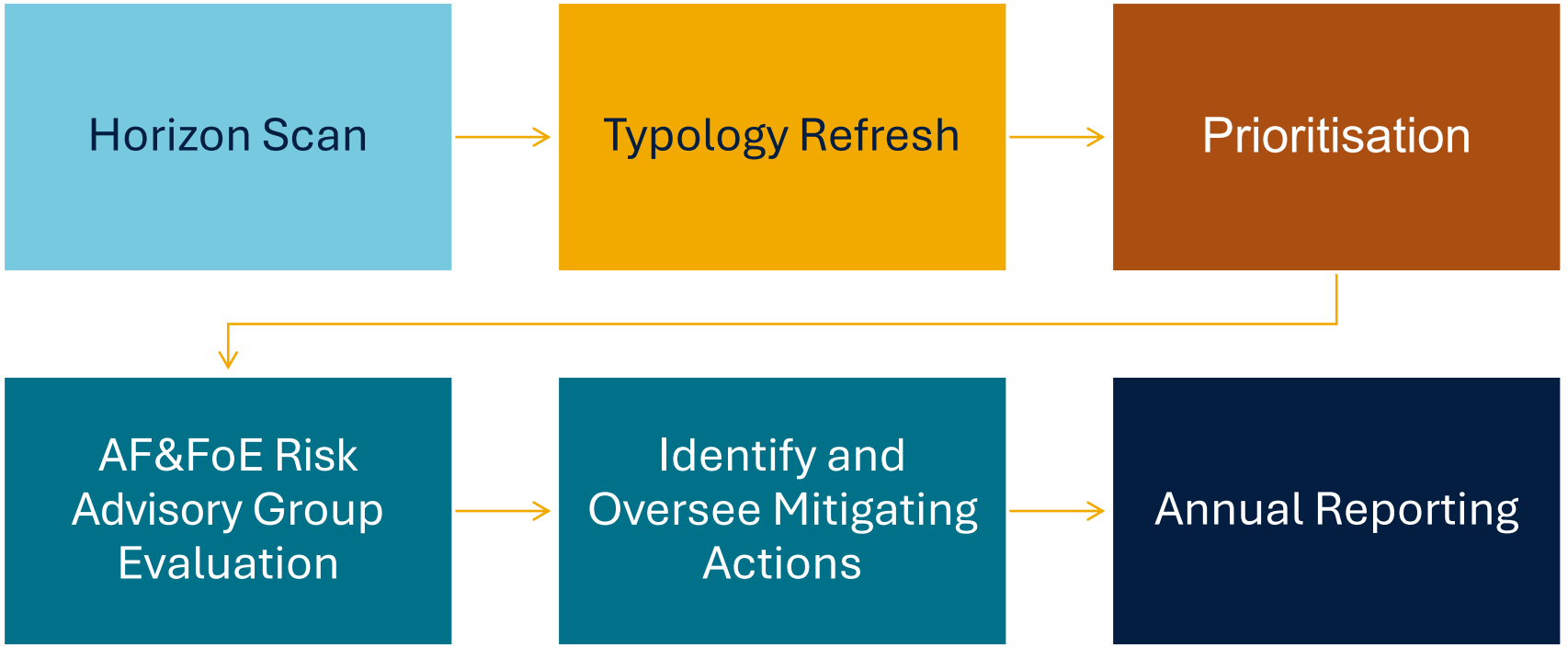


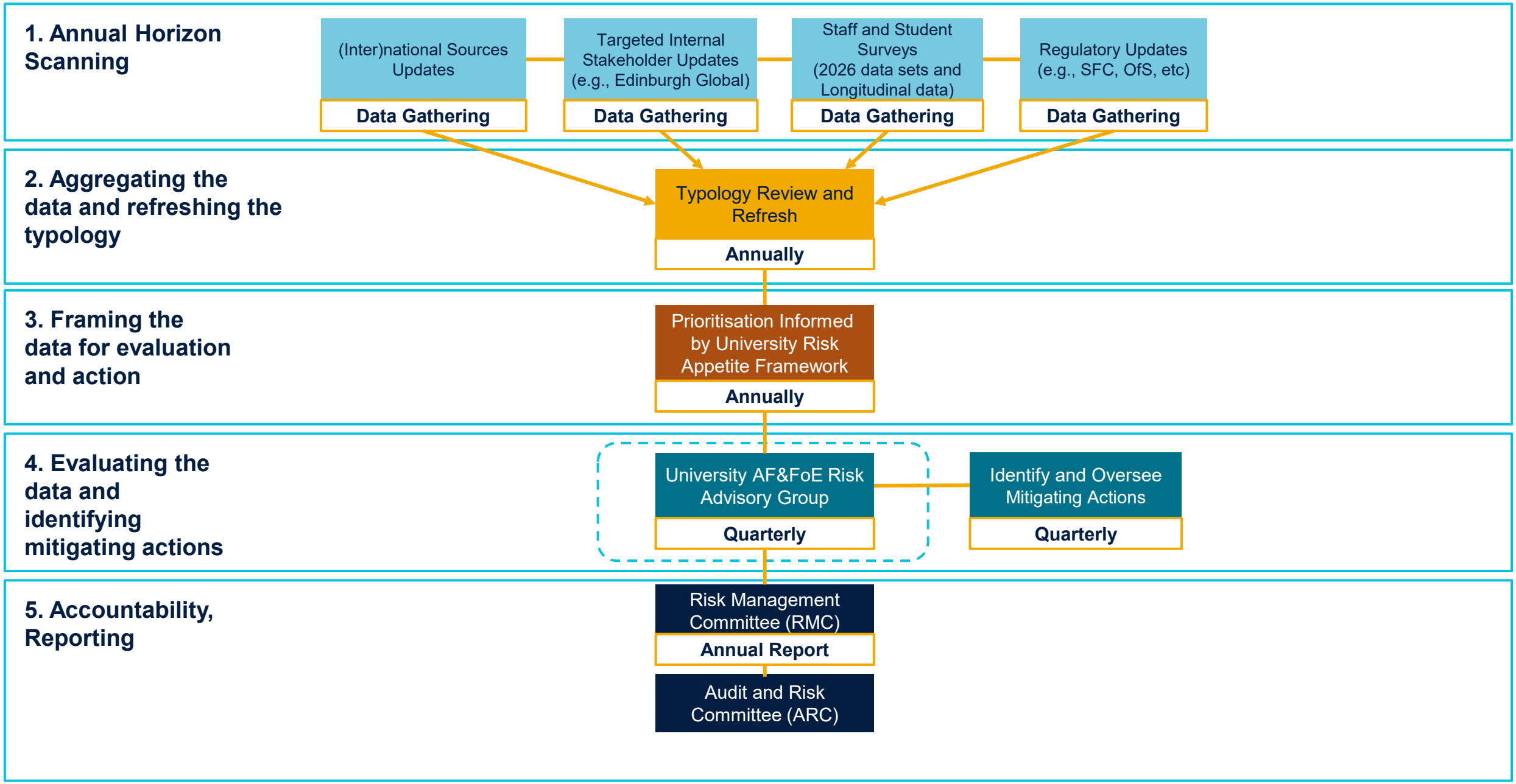
- Academic freedom pressures cluster around security, protest, and funding
- Universities act as both buffer and conduit for external agendas
- Policy and practice can be recalibrated to protect core freedoms



AF&FoE Risk Advisory Group Governance Cycle

Business as Usual (BAU) - Risk Advisory Group (2026-)




1. Annual Horizon Scanning
(Inter)national Sources Updates
Data Gathering
Targeted Internal Stakeholder Updates (e.g., Edinburgh Global)
Data Gathering
Staff and Student Surveys (2026 data sets and Longitudinal data)
Data Gathering
Regulatory Updates (e.g., SFC, OfS, etc)
Data Gathering
2. Aggregating the data and refreshing the typology
Typology Review and Refresh
Annually
3. Framing the data for evaluation and action
Prioritisation Informed by University Risk Appetite Framework
Annually
4. Evaluating the data and identifying mitigating actions
University AF&FoE Risk Advisory Group
Quarterly
Identify and Oversee Mitigating Actions
Quarterly
5. Accountability, Reporting
Risk Management Committee (RMC)
Annual Report
Audit and Risk Committee (ARC)

Stage one: Annual Horizon Scanning

- Activity Purpose:
  - Annual **horizon** scanning to **proactively strengthen** academic freedom and freedom of expression across the University through a data-informed approach.
- How?
  - Annual refresh of the University of Edinburgh AF&FoE Typology data points:
    - Consideration of (inter)national developments around academic freedom and freedom of expression to **update the Typology.**
    - Data drawn from **targeted internal stakeholders**:
      - For example: Speakers and Events Oversight Group (SEOG); Edinburgh Global; Edinburgh Research Office (ERO); HR.

Stage one: Annual Horizon Scanning

- Activity Purpose:
  - Annual **horizon** scanning to **proactively strengthen** academic freedom and freedom of expression across the University through a data-informed approach.
- How?
  - Use of **Edinburgh Language Model (ELM)**:
    - to horizon scan and **update** the **Typology**.
    - to **reduce staff time** requirements.
    - to support the **scope and scale** of the horizon scan.

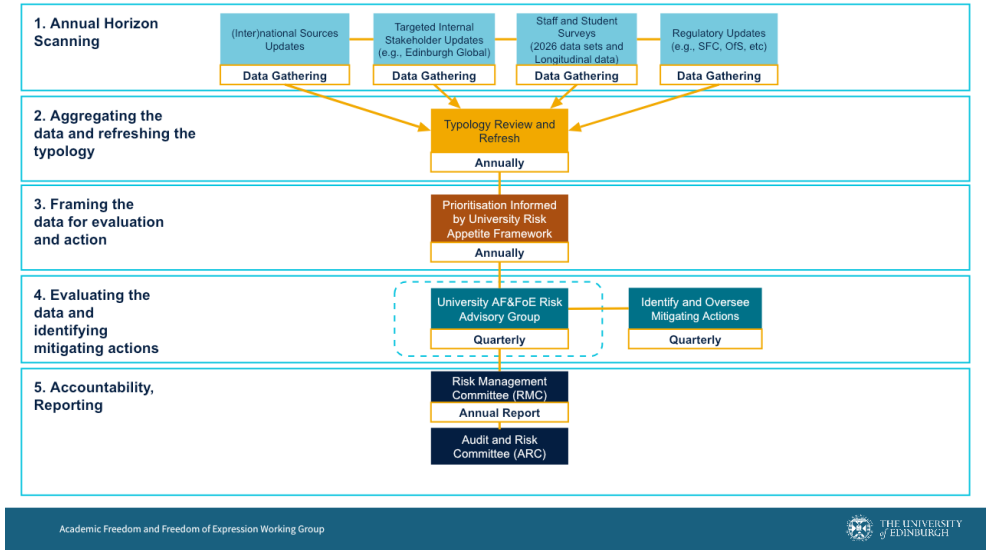
Stage one: Annual Horizon Scanning

- ELM supports evidence gathering, synthesis, and pattern recognition. It does not determine institutional judgements.
- Outputs are validated through identified institutional and external evidence sources before consideration by the AF&FoE Risk Advisory Group.



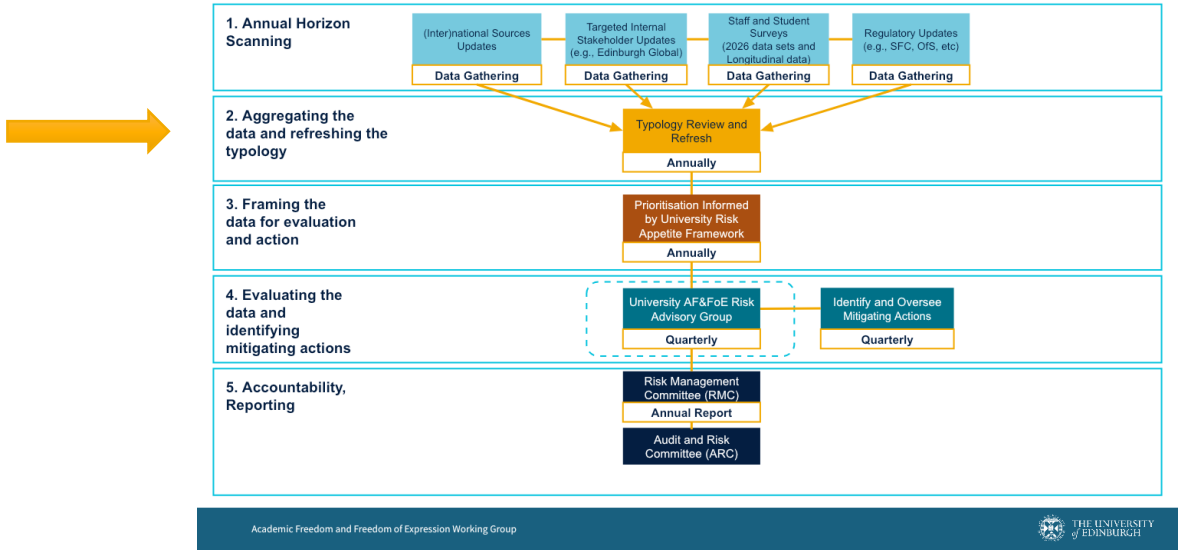
Stage one: Annual Horizon Scanning

- Survey evidence, refreshed as available.
- Staff evidence: the 2026 staff survey and longitudinal data from the Staff Engagement Survey.
- Student evidence: questions on academic freedom and freedom of expression within the Student Survey, with repeated questions supporting assessment of change over time.



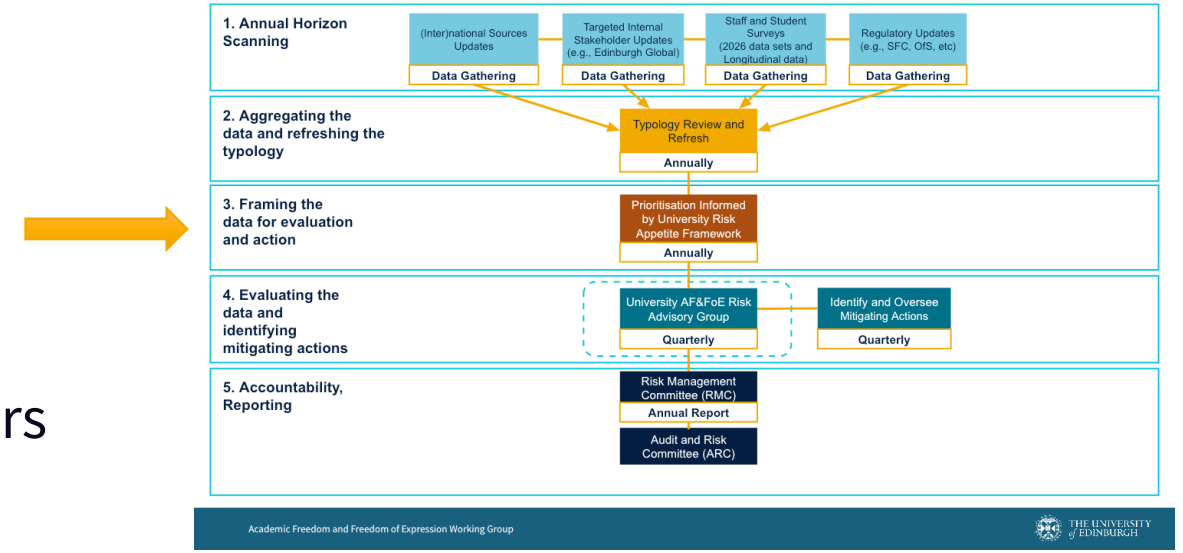
Stage two: Aggregating the data and refreshing the typology

- Data is aggregated by **Edinburgh Language Model (ELM)** and the **typology is refreshed** in preparation for operational use.
- AF&FoE Risk Advisory Group Chair **reviews** refreshed Typology.



Stage three: Framing the data for evaluation and action

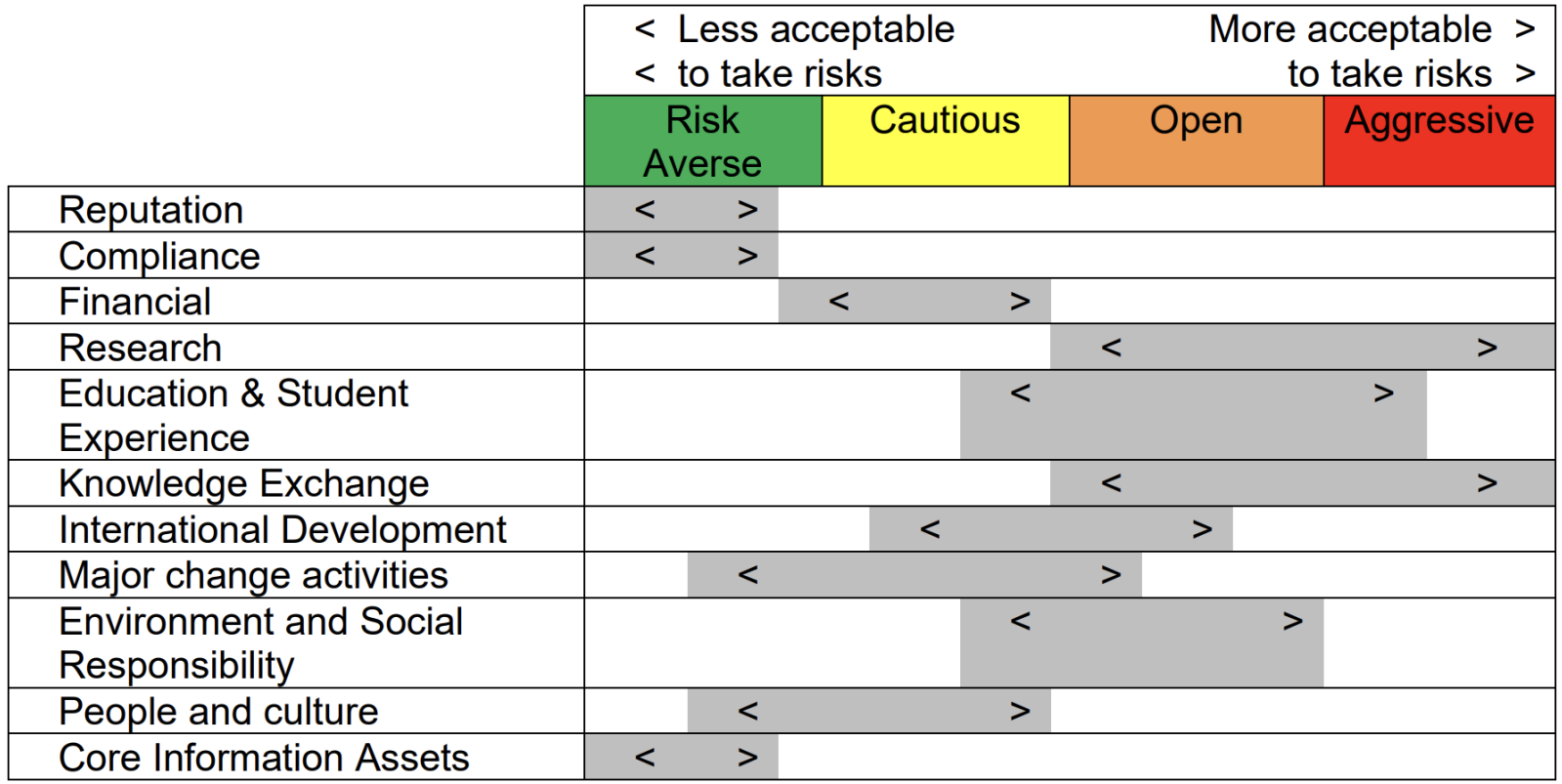
- In preparation for the AF&FoE Risk Advisory Group meeting, the Typology is used to organise the horizon-scanning (updated Typology) with its contents prioritised in line with the University's relative risk appetite level (See, University Risk Management Policy and Risk Appetite)
- The updated Typology is subsequently confirmed for distribution to Group members by the Chair.



Statement of Risk Policy and Risk Appetite

The University's approach is to minimise its exposure to reputational, compliance and financial risk, whilst accepting and encouraging an increased degree of risk in pursuit of its mission and objectives. It recognises that its appetite for risk varies according to the activity undertaken, and that its acceptance of risk is subject always to ensuring that potential benefits and risks are fully understood before developments are authorised, and that sensible measures to mitigate risk are established.

The University's appetite for risk across its activities is provided in the following statements, and is illustrated diagrammatically.



Stage four: Risk assessment and oversight of mitigations

- Concerning the University Risk Management Policy and Risk Appetite:
  - Note: ‘Reputation’ and ‘Compliance’, both highly germane to Academic Freedom and Freedom of Expression, are areas in which the University is ‘Risk Averse’.
  - The proposed BAU structure can articulate with any future revisions to the University Risk Management Policy and Risk Appetite framework.
  - Not every category will be relevant to every emerging issue. The Risk Advisory Group will use those relevant.

Stage four: Risk assessment and oversight of mitigations

- The principal standing item for the Risk Advisory Group is **to evaluate and agree an annual assessment of risks** to Academic Freedom and Freedom of Expression, aligned to the University Risk Appetite framework, by using the Typology which:
  - frames the horizon scanning activity.
  - supports the identification of proportionate mitigating actions and oversight of their implementation.

Stage five: University AF&FoE Risk Advisory Group Accountability

- University AF&FoE Risk Advisory Group:
  - **Applies the Typology through annual horizon scanning and risk assessment and identifies proportionate mitigating actions.**
  - Oversees implementation via relevant University committees and governance routes throughout the year.
  - The Group reports annually to Risk Management Committee (RMC).

AF&FoE Risk Advisory Group

AF&FoE Risk Advisory Group

- The AF&FoE Risk Advisory Group agrees its annual horizon-scanning assessment of institutional challenges to academic freedom and freedom of expression.
- It advises on institutional risk to academic freedom and freedom of expression; it does not consider individual cases, complaints or disciplinary matters, which remain within existing University procedures.
- Members contribute expert advice and recommendations, drawing upon their areas of responsibility.
- The Group identifies proportionate mitigating actions and oversees implementation via relevant University committees and governance routes throughout the year.
- The Group reports annually to RMC on emerging risks, agreed mitigations, and implementation progress, and reviews the effectiveness of actions taken.

Advantages of this framework

Advantages of this framework

- Broadly utilises existing institutional infrastructure.
- Anticipatory rather than reactive.
- Enables evidence-informed institutional judgement.
- Proportionate mitigation.
- Strengthens institutional resilience.
- Provides an enduring governance capability rather than a time-limited programme of work.
- The framework supports evidence-informed institutional judgement. It does not replace legal advice, existing University procedures, or case-specific decision-making. Rather, it provides a structured governance approach to identifying, evaluating, and responding proportionately to emerging risks to academic freedom and freedom of expression.

Worked Example One: Foreign Interference

The Annual Horizon Scan Identifies

International evidence indicates increasing use of foreign state pressure, surveillance, and transnational repression to influence the speech, teaching, research, and participation of students and academics beyond national borders.

The Typology categorises

- Mechanism (How?): Systemic and policy-based interference - transnational repression; where relevant, national security instruments.
- Perpetrator (Who acts?): State and government actors: foreign governments, state agencies, and state proxies.
- Body affected (Who or what is targeted?): Individuals; institutions; academic practices; student groups.

The University Risk Appetite Framework informs evaluation

- The University is relatively risk averse where Reputation, Compliance, and Core Information Assets are concerned, making these the principal lenses through which this emerging issue is evaluated.
- Consideration should also be given to Research, International Development, and People and Culture.

Potential Impacts

- Staff and student safety: colleagues and students with ties to states of concern may face pressure, surveillance, or reprisal, directed at relatives abroad.
- Research security: collaborations in sensitive areas may require export-control or trusted-research review, delaying projects and in some cases making them impossible to continue.

Potential Impacts

- International partnerships: agreements may need to be paused or renegotiated where partners are subject to state direction, with consequences for student mobility and joint provision.
- Teaching and supervision: colleagues may avoid particular topics, and students particular questions, narrowing what is taught and examined without any formal decision having been taken.

The University Risk Appetite Framework informs evaluation (Relevant University Risk Appetite categories)

- Reputation.
- Compliance.
- Research.
- International Development.
- Core Information Assets.
- People and Culture.

The AF&FoE Risk Advisory Group Evaluates the Evidence (Questions might include)

- Does the evidence indicate a pattern of pressure on staff or students from foreign states or proxies?
- Is the University's approach to partnership due diligence keeping pace with the risks identified?
- Do staff know how to report concerns?
- Is there evidence that existing policies on events, visiting speakers, and international collaborations are operating as intended?

The AF&FoE Risk Advisory Group Identifies Mitigations

- Issue guidance for staff and students.
- Strengthen reporting mechanisms.
- Review international partnership governance.
- Coordinate with research security functions.

Reporting

- Annual assessment submitted to the Risk Management Committee (RMC), highlighting increasing risks associated with foreign interference and transnational repression affecting academic freedom and freedom of expression.
- The Risk Advisory Group oversees implementation via relevant University committees and governance routes throughout the year. The Group reports annually to RMC on risks, mitigations, and implementation progress.

Worked Example Two: Digital Amplification and Online Harassment

The Annual Horizon Scan Identifies

International evidence indicates increasing use of digital and social media to amplify academic disputes beyond their original context.

Coordinated online campaigns, harassment, and surveillance, associated with teaching, research, and public engagement, can create risks of self-censorship and constraints on lawful academic expression.

The Typology categorises

- Mechanism (How?): Institutional and societal pressure; online harassment, and surveillance.
- Perpetrator (Who acts?): Non-state external actors (media ecosystems, advocacy groups, coordinated online networks); potentially intra-university communities.
- Body affected (Who or what is targeted?): Individuals and academic practices; potentially institutions and student groups.

Potential Impacts:

- Self-censorship: colleagues withdraw from public engagement, media comment, and online platforms, removing the University's expertise from public debate at the moments it is most needed.
- Staff and student wellbeing: sustained personal abuse affects health, absence, and retention, and the willingness of colleagues to take on public-facing roles.
- Teaching and research choices: contested topics are quietly avoided in curriculum design and in the framing of research questions, narrowing the discipline over time.
- Institutional reputation: the University is judged on the speed and visibility of its response, rather than on the substance of the decision it takes.

The University Risk Appetite Framework informs evaluation (Relevant University Risk Appetite categories):

- Reputation.
- Compliance.
- Core Information Assets.
- People and Culture.
- Education & Student Experience.
- Research.

The University Risk Appetite Framework informs evaluation

- The University is relatively risk averse where Reputation, Compliance, and Core Information Assets are concerned making these the principal lenses through which this emerging issue is evaluated.
- Consideration should also be given to People and Culture, Education & Student Experience, and Research.

The AF&FoE Risk Advisory Group Evaluates the evidence (Questions might include)

- To what extent are online campaigns creating a chilling effect on teaching, research, or public engagement?
- Are staff or students self-censoring?
- *Is there evidence that current arrangements are protecting lawful expression in digital environments?*
- *Are support and reporting arrangements being used, and is there evidence of unmet need?*

The AF&FoE Risk Advisory Group Identifies Mitigations

- Strengthen digital engagement guidance.
- Review support arrangements for staff and students experiencing online harassment.
- Strengthen reporting and escalation pathways.

Reporting

- Annual assessment submitted to the Risk Management Committee (RMC), highlighting increasing digital amplification, online harassment, and surveillance, as institutional and societal mechanisms that may constrain academic freedom and freedom of expression.
- The Risk Advisory Group oversees implementation via relevant University committees and governance routes throughout the year. The Group reports annually to RMC on risks, mitigations, and implementation progress.

Worked Example Three: Institutional Neutrality

The Annual Horizon Scan Identifies

International evidence indicates increasing expectations that universities should either make, or refrain from making, institutional statements on contested political and social issues.

Competing expectations from governments, staff, students, alumni, donors, and campaign groups, are placing increasing pressure on institutional neutrality and decision-making.

The Typology categorises:

- Mechanism (How?): Institutional and societal pressure; political and ideological control or censorship, where pressure seeks to narrow permissible institutional or academic discourse.
- Perpetrator (Who acts?): Government; external actors; internal communities.
- Body affected (Who or what is targeted?): Institutions and academic practices; individuals.

Potential Impacts

- Institutional autonomy: where the University is expected to speak, silence and speech are both read as positions, and the decision potentially shifts from academic judgement to whichever constituency applies the most pressure.
- Staff and student confidence: colleagues and students conclude that the University speaks for some and not for others, and trust in governance may erode unevenly across communities.
- Governance and decision-making: statements are issued at School or unit level in the absence of a clear route, producing inconsistency the institution then has to defend.
- Partner and donor relations: statements, and their absence, are interpreted by alumni, donors, and partners, as commitments, and expectations follow.

The University Risk Appetite Framework informs evaluation (Relevant University Risk Appetite categories)

- Reputation.
- Compliance.
- People and Culture.
- Education & Student Experience.
- Research.

The University Risk Appetite Framework informs evaluation

- The University is relatively risk averse where Reputation and Compliance are concerned, making these the principal lenses through which this emerging issue is evaluated.
- Consideration should also be given to People and Culture and Education & Student Experience.

The AF&FoE Risk Advisory Group Evaluates the Evidence (Questions might include)

- Could institutional statements inadvertently constrain academic freedom or freedom of expression?
- Is there evidence that current guidance is understood and used?

The AF&FoE Risk Advisory Group Identifies Mitigations

- Review and refresh institutional guidance on institutional statements and institutional voice.
- Review the governance arrangements through which statements are authorised.

Reporting

- Annual assessment submitted to the Risk Management Committee (RMC), highlighting increasing pressures relating to institutional neutrality and their implications for academic freedom and freedom of expression.
- The Risk Advisory Group oversees implementation via relevant University committees and governance routes throughout the year. The Group reports annually to RMC on risks, mitigations, and implementation progress.

Worked Example Four: AI-Mediated Threats to Academic Freedom and Academic Discourse

The Annual Horizon Scan Identifies

International evidence indicates increasing use of generative AI to create, manipulate, and disseminate, academic content, creating new challenges for scholarly independence, public trust, and freedom of expression.

Synthetic media, AI-generated misinformation, and automated amplification are increasingly capable of influencing academic discourse.

The Typology categorises

- Mechanism (How?): Disinformation campaigns (including LLM grooming); institutional and societal pressure.
- Perpetrator (Who acts?): External actors; coordinated online networks; governments (where applicable).
- Body affected (Who or what is targeted?): Academic practices and individuals.

Potential Impacts

- Research integrity: synthetic or manipulated material enters the scholarly record, with the burden of disproving it falling on the individual scholar.
- Scholarly independence: automated amplification and reputational attack shape which questions researchers are willing to pursue.
- Attribution and misrepresentation: fabricated statements and outputs are attributed to named staff, requiring correction by the University.
- Public trust in expertise: the University's published work becomes harder to distinguish from fabricated material carrying its name.

The University Risk Appetite Framework informs evaluation (Relevant University Risk Appetite categories)

- Reputation.
- Compliance.
- Core Information Assets.
- Research.
- People and Culture.

The University Risk Appetite Framework informs evaluation

- The University is relatively risk averse where Reputation, Compliance, and Core Information Assets are concerned, making these the principal lenses through which this emerging issue is evaluated.
- Consideration should also be given to Research and People and Culture.

The AF&FoE Risk Advisory Group Evaluates the Evidence (Questions might include)

- Are AI-enabled misinformation or amplification campaigns constraining academic freedom or scholarly independence?
- Are support and reporting arrangements being used, and is there evidence of unmet need?
- Is there evidence that current guidance on generative AI is understood and used?

The AF&FoE Risk Advisory Group Identifies Mitigations

- Review and refresh institutional guidance on the use of generative AI.
- Review monitoring and reporting arrangements.

Reporting

- Annual assessment submitted to the Risk Management Committee (RMC), highlighting emerging risks associated with AI-generated misinformation, synthetic media and automated amplification affecting academic freedom, freedom of expression and scholarly independence.
- The Risk Advisory Group oversees implementation via relevant University committees and governance routes throughout the year. The Group reports annually to RMC on risks, mitigations, and implementation progress.

Worked Example Five: Contested Public Issues: Institutional Responses and Restriction

The Annual Horizon Scan Identifies

International evidence indicates that disputes over invited speakers, teaching, exhibitions, public engagement, and protest are increasingly met with cancellation, organised pressure, and weaponised accusation.

The risk to academic freedom and freedom of expression arises from these responses, and from the institutional expectation to manage them, rather than ordinarily from disagreement itself.

The Typology categorises

- Mechanism (How?): Censorship and cancellation of events; moral panic and weaponised accusations.
- Perpetrator (Who acts?): Internal communities; external actors; universities.
- Body affected (Who or what is targeted?): Academic practices; student groups; individuals.

Potential Impacts

- Complaints and litigation: decisions to permit or to restrict events generate challenge from opposing directions at once, so procedural defensibility matters more than the outcome chosen.
- Cost of event management: security, stewarding, legal advice, and time-consumption, may become a de facto restriction on who is invited.
- Willingness to host: Schools and student societies decline to invite speakers, rather than manage the process; so, restriction happens by attrition and is never recorded as a decision.
- Reputation and public confidence: the University is judged on individual decisions taken under time pressure and, sometimes, on incomplete information.

The University Risk Appetite Framework informs evaluation (Relevant University Risk Appetite categories)

- Reputation.
- Compliance.
- People and Culture.
- Education & Student Experience.
- Research.

The University Risk Appetite Framework informs evaluation

- The University is relatively risk averse where Reputation and Compliance are concerned, making these the principal lenses through which this emerging issue is evaluated.
- Consideration should also be given to People and Culture and Education & Student Experience.

The AF&FoE Risk Advisory Group Evaluates the Evidence (Questions might include)

- Are recurring patterns emerging that require institutional intervention to protect lawful expression?
- What does the evidence suggest about how existing governance arrangements are working in practice?

The AF&FoE Risk Advisory Group Identifies Mitigations

- Review the procedures governing speaker approval, event management, and protest.
- Strengthen support for staff and students who become the subject of organised campaigns.

Reporting

- Annual assessment submitted to the Risk Management Committee (RMC), highlighting recurring pressures relating to contested public issues and their implications for academic freedom and freedom of expression.
- The Risk Advisory Group oversees implementation via relevant University committees and governance routes throughout the year. The Group reports annually to RMC on risks, mitigations, and implementation progress.

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