## Dyson Institute of Engineering and Technology Code of Practice on Freedom of Speech

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## 1.0 Purpose

- 1.1 This Code of Practice sets out the Dyson Institute of Engineering and Technology's approach to securing Freedom of Speech and Academic Freedom within the law in accordance with the Higher Education (Freedom of Speech) Act 2023. Our aim is to promote rigorous, respectful debate, ensure compliance with the law, and foster an inclusive academic environment. The Institute has had a Freedom of Speech policy since registration; this Code of Practice revises and replaces that policy to address the enhanced legal duties required by the provisions of the Higher Education (Freedom of Speech) Act 2023 which came into effect 1st August 2025.
- 1.2 This Code of Practice has been introduced pursuant to the requirements of the Higher Education (Freedom of Speech) Act 2023 and reminds staff, students and visiting speakers of the unique positioning of the Institute, sets out our values and expectations in relation to Freedom of Speech and Academic Freedom within the law, identifies the legislation that the Institute must operate under in this area, and outlines responsibilities. It sets out how the Dyson Institute's approach to securing Freedom of Speech and Academic Freedom within the law in practice across its activities, including events with visiting speakers, and in teaching and research settings. This includes, for example, teaching in classroom and online settings (including lectures and seminars), the curriculum, teaching and lecture materials, field trips, conferences and research seminars.
- 1.3 This Code details who in the Institute is responsible for ensuring it is deployed effectively and who members of the community should contact if they have questions, concerns or complaints.
- 1.4 This Code of Practice applies to:
  - all members of staff employed by Dyson Technical Training Ltd
  - all students registered on a course of study with the Dyson Institute; and
  - visiting speakers and all other persons invited to speak by the Institute or by its staff or students.
- 1.5 Advice and guidance on Freedom of Speech and Academic Freedom matters can be viewed on the Institute's intranet The Hub, or sought directly from the Registrar via <a href="mailto:dyson.com">dyson.com</a>

### 2.0 Definitions

The following definitions adopted in this Code are taken from the <u>Higher Education Research Act 2017</u> and/or the <u>Office for Students (OfS) Regulatory Advice</u>:

#### 2.1 Academic Freedom:

The freedom of academic staff to question and test established ideas/received wisdom; and to put forward and present controversial or unpopular opinions, without placing themselves at risk of losing their jobs or privileges.

### 2.2 Freedom of Speech:

Means freedom to impart ideas, opinions, or information (in speech, writing, or images—including electronic and social media), without interference, subject only to limitations permitted by law, without fear of censorship or reprisal.

The following definitions are internally defined by the Institute and are applied in good faith as being comprehensive.

### 2.3 Members of the Community:

Includes all registered students, staff, contractors, visiting speakers, and anyone associated with Institute activities.

### 2.4 Institute Spaces:

Physical spaces and rooms whose primary purpose is to service and facilitate all the Institute's activities, including: Village Pods, Upstairs at The Roundhouse, D5 and D6 lecture rooms/laboratories, D6 kitchenette, the library, the D5 kitchen, D5 social learning spaces, D5 open plan staff office and meeting rooms, together with online spaces and platforms that support these activities such as Canvas, the Ontrack Teach/Learner Hub and other virtual environments or academic online platforms that may be introduced in the Institute.

#### 2.5 Protected Free Speech:

Is any form of expression, spoken, written, or otherwise, that is not prohibited by criminal or civil law. It includes speech that may be controversial, offensive, or unpopular, as long as it does not break the law (e.g. by inciting violence, harassment, or hatred).

## 3.0 Our values and expectations

3.1 The Institute is proud of its place as an innovator in a diverse English Higher Education sector and embraces its unique position as an HE provider deeply connected to Dyson Technology. Our strategic plan 2023-28 communicates our vision of developing the best engineers in the world, and our mission of supporting Dyson to advance technology globally through ground-breaking research and the development of engineering leaders. The Institute exists to be a strategic talent asset for Dyson, and all of its programmes are designed for employees of Dyson (either as undergraduate engineers or as graduates). Thus, our specific context is commercial, global

- and professionally regulated, and this Code of Practice summarises expectations of free speech within that understanding.
- 3.2 The Institute is also mindful of its present and foreseeable subject specialty, focused on the development of engineers through engineering education. The Dyson Institute is not a multi-faculty institute covering a breadth of subject areas but has a clear focus on supporting the development of Dyson engineers. As part of our role as engineers and engineering educators, we promote the professional values of engineers, such as working within our area of expertise, and showing commitment to Equality, Diversity and Inclusion (EDI) in engineering practice.
- 3.3 This Code of Practice is designed to support freedoms within our unique context as an independently governed specialist engineering higher education provider within a wider privately-owned corporation; it is deeply connected with the wider Dyson Group. Students are employees of Dyson Technology, and they spend the majority of their working hours in workplace rotations on Dyson projects, in Dyson workplaces, and as members of Dyson teams. The Institute restates its commitment to the wider Dyson community and the positive work environment Institute staff enjoy as much any other Dyson employee.
- 3.4 Notwithstanding this broader context, the Dyson Institute is an academic community of staff and students and as such is a place for open, critical thinking, and the creation, sharing and dissemination of knowledge. We are an Institute that teaches, researches, and applies knowledge in engineering and engineering education, and our 2023-28 strategy invites the Institute team to break convention and take alternative approaches this is, in essence, at the heart of both being pioneering and of innovation goals towards which we are oriented. In the execution of these activities, Academic Freedom, and Freedom of Speech within the law, are crucial. The ability of our staff and students to freely challenge prevailing orthodoxies, query the positions and views of others, and to put forward ideas that may sometimes be radical in their formulation. We are committed to ensuring Academic Freedom within the law for all academic staff.
- 3.5 We recognise that, at times, the ideas and views of different members of our community, or those visiting the Institute, will differ and may come into conflict with one another. It may be that some, or most, of the Institute community consider some of these opinions to be disagreeable, or even offensive. The Institute does not function in a vacuum, and wider conflicts and disputes involving, for example, ethnicity, religion or belief, personal identity or political convictions, may find expression at Dyson amongst the student and staff body. However, Freedom of Speech is not an unqualified right. Whilst it is not the role of the Institute to protect or shield people from ideas or opinions with which they disagree, or which make them feel uncomfortable, we do promote the expectation that staff and students treat one another with dignity and respect. A more detailed description of expectations in this regard can be found in the Institute's Respect at Work and Study Statement.
- 3.6 In promoting Freedom of Speech within the law, the Institute will have particular regard to the importance of Freedom of Speech and take reasonably practicable steps to secure the lawful speech rights of staff, students, and visiting speakers of the Institute independently of the viewpoint being expressed. It is the responsibility of Council as the governing body to ensure that the Institute secures these freedoms. The full responsibilities of Council are set out in Section 4.
- 3.7 The Institute's identity is incontrovertibly associated both the Dyson family and with Dyson Technology, and individual views expressed publicly may well be interpreted and re-stated in this light. Individuals are therefore urged to carefully consider how controversial views should be expressed.
- 3.8 The Institute is not obliged to provide a platform simply because a particular individual or external organisation wishes to speak. Visitors speak by invitation from the Institute, its staff or students and their right to free speech within the law in Institute spaces is protected under the procedures in this Code.

## 4.0 Responsibilities for this Code

### Council (The Governing Body)

- 4.1 Council, as the governing body of the Dyson Institute, holds primary responsibility for ensuring compliance with all legal and regulatory obligations relating to Freedom of Speech and Academic Freedom in Institute Spaces. In fulfilling this responsibility, the governing body shall have particular regard to the importance of Freedom of Speech and will:
  - Take all reasonably practicable steps to secure Freedom of Speech and Academic Freedom within the law for students, staff, and visiting speakers.
  - Actively promote the importance of Freedom of Speech and Academic Freedom within the law throughout the Institute's activities and decision-making processes.
  - Ensure that an up-to-date and compliant Code of Practice on Freedom of Speech is adopted, published in a prominent and accessible manner, and communicated to all relevant parties, including students (at least annually), staff, and visiting speakers.
  - Oversee the effective implementation of this Code and ensure that appropriate institutional policies and procedures are in place to uphold these principles.
  - Regularly review and update this Code, and any related institutional processes, to remain compliant with current law and regulatory requirements, including the <u>Higher Education (Freedom of Speech) Act 2023</u> and associated guidance. This review will be no less than annually but may be more frequent as required by changes in law or regulatory requirements.
  - Balance and reconcile the Institute's various legal obligations, recognising that the duty to secure Freedom of Speech and Academic Freedom within the law is a distinct and fundamental responsibility.
- 4.2 The governing body is accountable for upholding these commitments and for fostering a culture in which Freedom of Speech and Academic Freedom within the law are core values of the Dyson Institute.
- 4.3 The Council will charge the Director of the Institute with the day-to-day responsibility of ensuring the application of this Code of Practice and will scrutinise its deployment and decisions made by the Institute in the Director's Report at each Council meeting.
- In adopting this Code, the Dyson Institute Council has authorised the Director to act on its behalf to ensure, as far as is reasonably practicable, that all students, staff and visiting speakers comply with the requirements of this Code.

### The Director of the Institute

4.5 The Director of the Dyson Institute is responsible for the day-to-day management of the Institute and as Accountable Officer is responsible for ensuring that the Institute's actions adhere to this Code of Practice, and for making clear assurance to the OfS about compliance. The Director will provide an annual report on Freedom of Speech to the first Council meeting of an academic year, reflecting on the previous year. This report will include any recommendations to update this Code as part of its annual review. However, the Director and

- Council reserve the right to update this Code in-year where it is necessary, for example, to reflect changes in legislation or regulatory requirements introduced by the OfS.
- 4.6 The Director will report on Freedom of Speech as a standing item in the quarterly Director's Report to Council, which will be supplemented by a Risk Register and a record of all decisions taken that are likely to have a substantial (positive or negative) effect on Freedom of Speech within the law.

### The Registrar

- 4.7 The Registrar will be the first point of contact for any member of the Institute community who wishes to discuss matters of Freedom of Speech or Academic Freedom. Where the Registrar is unable to provide a definitive answer based on the OfS three-step framework 1, they are responsible for seeking external legal advice.
- 4.8 The Registrar is responsible for the operational management of procedures relating to the consideration and assessment of matters pertaining to Freedom of Speech, including the handling and investigation of any related concerns.
- 4.9 In cases where an individual wishes to appeal a decision or outcome arising from these processes, the appeal will be determined by the Director of the Institute. The decision of the Director following such an appeal shall be final within the framework of this code.

## 5.0 The Secure Duty and the Publication of the Code

### Publication and Accessibility of this Code

- 5.1 To fulfil our statutory obligations and promote a culture of openness, this Code of Practice will be published in a prominent location on the Institute's website and on The Hub. The Code will be:
  - Freely accessible by students, staff, visiting speakers, applicants and members of the public
  - Available without password or security restriction
  - Kept up to date, with the most currently version clearly designated as such and brought to the attention of all students annually.

### Statement of the Code and Communication

Pursuant to the Higher Education (Freedom of Speech) Act 2023 The Office for Students has published Regulatory Advice 24: Guidance related to Freedom of Speech and recommends the following as good practice. The Dyson Institute is committed to complying with these requirements in implementing its statutory obligations:

- The Institute must bring this Code of Practice to the attention of all students once a year. The Institute will
  achieve this by making this part of enrolment/re-enrolment which happens in September of each academic
  year.
- The Institute will publish this Code of Practice in the Governance section of the website. It will also be available on the internal intranet SharePoint page known as The Hub.
- The Institute will publish the following statement, which summarises this Code's content and how to access it, in the following places: Student Handbook, VLE, the student recruitment section of the website, and any associated policies.

"The Institute's Freedom of Speech Code of Practice sets out the principles and procedures that ensure freedom of speech and academic freedom are protected for all members of the Institute's community. It provides clear guidance for students, staff, and visiting speakers on their rights and responsibilities, outlines the processes for organising speakers, and details how decisions affecting free speech are made in line with statutory duties. The Code confirms that the Institute's governing body ('Council') are required to protect freedom of speech and academic freedom."

### Review and Update Procedures

5.3 This Code will be reviewed by Council no less than annually, or more frequently as required by changes in law or regulatory requirements. Updates and revisions will be publicised through the same communication channels to ensure ongoing awareness and compliance.

# 6.0 The Three-Step Framework for Assessing Compliance with the Secure Duty

**6.1** Whenever the Dyson Institute considers any measure, policy, or decision that may affect Freedom of Speech or types of speech, the following three-step framework will be applied to ensure compliance with the statutory duty to secure Freedom of Speech within the law. In particular, this applies to event management and external speakers. This can be found in the Dyson Institute External Speakers, Events and Meetings Policy.

### Step 1: Is the speech 'within the law'?

The Institute will first determine whether the speech or activity in question is lawful. This involves considering whether the speech is prohibited by any relevant laws, such as those concerning defamation, harassment, incitement to violence, hate speech, or terrorism. It will also consider the implications of any employment contract in operation, and any protected beliefs. If the speech is considered unlawful, the duty to secure Freedom of Speech does not apply.

#### Step 2: Are there any 'reasonably practicable steps' to secure the speech?

If the speech is lawful, the Institute must identify any reasonably practicable steps to secure that the speech can take place. This may include amending procedures, adjusting event arrangements, or providing guidance. If such steps

are reasonably practicable, the Institute must take them to facilitate speech and must not restrict it.

## Step 3: Are any restrictions 'prescribed by law' and proportionate under the European Convention on Human Rights?

If it is not reasonably practicable to secure the speech, any restrictions imposed must be prescribed by law and proportionate in accordance with the European Convention on Human Rights. This means restrictions are only permitted when legally justified and no broader than necessary to address the legal concern.

- **6.2** By following this framework in its decision-making and policy development, the Dyson Institute will uphold its obligation to secure and promote Freedom of Speech within the law for all members of its community and visitors.
- **6.3** Section 11 of this Code sets out the process for raising a concern, which will include a triage test before any investigation is launched. This triage will determine Step 1 as above. The triage test will exist in other policies such as student and staff disciplinary to ensure that investigations which are preventable, are so.

# 7.0 Promoting and Securing Freedom of Speech at the Dyson Institute

- 7.1 To deliver its responsibility to promote Freedom of Speech, the Institute has a range of actions in place. These include:
  - Setting and role modelling standards relating to professional public and internal behaviour, and welcoming free speech in the Institute
  - Annual Training for Council members and all Institute staff to remind them of the free speech principles and Code of Practice, and the Institute's context within the current legislative framework
  - Running workshops with staff and student groups to communicate and explore clear and consistent internal
    messaging for our community regarding our understandings of openness, freedom and research, and be able
    to explain how these are wholly appropriate for our context. Specific workshops will support those with direct
    responsibility for managing and upholding Freedom of Speech and Academic Freedom
  - Inviting the Dyson Institute Student Committee to nominate a member of their executive who will advocate for free speech within student-organised activities, undergo training, and liaise with the Institute on such matters.
  - Making clear during recruitment and onboarding of academic staff the kind of environment they are entering, and the limitations (as well as opportunities) this presents for research, external engagement and IP
  - Structuring line management activities for academic staff such that governance routes for research and external engagement are responsive and supportive rather than restrictive and procedural
  - Ensuring that related policies and training reflect our Freedom of Speech commitments and do not curtail lawful free speech.

### **Teaching**

- 7.2 The Dyson Institute will ensure that its teaching and research arrangements, curriculum development and review, and policies and procedures reflect its duties to take reasonably practicable steps to secure Freedom of Speech and Academic Freedom within the law. In particular:
  - its processes for programme development and approval, quality assurance and academic assessment will respect the rights of Freedom of Speech and Academic Freedom;
  - its processes for facilitating research will respect the rights of Freedom of Speech and Academic Freedom; and
  - no individual will be subjected to disciplinary action or other less favourable treatment by or on behalf of the
    Institute because of the lawful exercise of Freedom of Speech and Academic Freedom when upholding the
    values and expectations laid out in this Code of Practice.
- 7.3 When teaching potentially sensitive or controversial views, organising activities such as research seminars, or other academic activities, the module leader or facilitator should consider what steps they can take to ensure that Freedom of Speech and Academic Freedom is protected.
- 7.4 Occasionally, situations may arise where the views expressed cause particular distress to some staff or students. Where possible, this risk should have been identified in advance and actions taken to mitigate the risk, such as those listed above. Should a particularly challenging situation arise, it will be up to the member of staff to determine the most appropriate response. Except in exceptional circumstances the Institute would not expect an activity to be cancelled in these circumstances as this would be depriving other students of the opportunity to express their Freedom of Speech and to explore challenging issues.

### Academic Research

- 7.5 Principles: The Institute affirms that Academic Freedom includes the right to undertake research that may be controversial, unpopular, or challenge prevailing views. Research must be protected from undue internal or external pressure, including reputational concerns or political sensitivities.
- 7.6 Freedom to Research: Staff and students are entitled to pursue lawful research without being penalised for the conclusions they reach or the viewpoints they support. The Institute must not restrict research because it conflicts with institutional values or policies, attracts criticism from external stakeholders, or is politically or socially contentious.
- 7.7 Research and Ethics Committees: Ethical review processes must focus on genuine ethical concerns, not reputational risk. They must be transparent and documented and explicitly consider Academic Freedom in their decisions. Committees must avoid imposing conditions that suppress lawful research findings or methodologies.
- **7.8** Funding and External Influence: The Institute must not accept funding arrangements that impose ideological or political conditions or require censorship or monitoring of researchers.
- **7.9** Support for Researchers: Researchers facing threats, censorship, or pressure due to their work must be supported. Reasonably practicable steps may include public statements of support, security measures, and reinstatement of research opportunities or funding.

7.10 In relation to research more generally, academic staff are expected to exercise their Academic Freedom in a way that is consistent with the Institute's Research Integrity Policy, introduced in 2024/25.

### Dyson Institute Student Committee

- 7.11 The Dyson Institute Student Committee (DISC) is not expected to have a separate Code of Practice. As such, the Freedom of Speech of students themselves and any visitors invited by the Dyson Institute Student Committee is covered by this Code of Practice.
- **7.12** For the removal of doubt, this Code of Practice covers the DISC Executive and officer team when acting in that role, and in DISC-run clubs and societies, DISC elections, DISC arranged social events.

## 8.0 External Speakers, Meetings and Events

- 8.1 The Institute operates a strong presumption in favour of permitting all lawful events where speakers have been invited to Institute engagements. Except in exceptional circumstances, approval will not be refused, restricted or delayed solely because of a speaker's or organiser's lawful ideas, opinions or affiliations. Any conditions imposed will be no more intrusive than necessary to address identified risks.
- 8.2 The responsibility to promote and protect free speech covers all events, demonstrations, protests and other events organised by a member of staff or student of the Institute, including events organised by individuals or groups using the Institute name, funding, branding or facilities (whether physical or virtual). It is particularly relevant to the following activities (although this list is not exhaustive):
  - meetings, arranged internally or externally, and held physically or virtually;
  - demonstrations, protests or marches on campus;
  - other forms of Freedom of Speech.
- 8.3 Events involving external or guest speakers must be submitted at least 10 working days in advance using the External Speaker Proposal Form. This form can be obtained from <a href="mailto:dyson.com">dyson.nstitute.regulation@dyson.com</a>
- A Principal Organiser must be named for every event. They are responsible for compliance with this Code, completing the External Speaker Proposal Form with full details and an initial risk assessment, and briefing the external or guest speaker(s) on lawful free speech, respectful conduct and relevant Institute policies. The Principal Organiser must assess the nature of the event, expected attendance, and external speaker background (including online presence). The Principal Organiser should identify any risks relating to security, safety, equality, diversity, or Prevent Duty in the External Speaker Proposal Form.
- 8.5 The Registrar (or delegate) will conduct the review of the request.
- 8.6 In assessing whether to allow approval to proceed with an event the Institute will apply the three-step framework set out in Section 2 of the Office for Students' Regulatory Advice 24: Freedom of Speech Guidance 1:

- Step 1: Is the speech within the law? If not, the duty to secure speech does not apply.
- Step 2: Are there any reasonably practicable steps to secure the speech? If so, the Institute will take those steps and will not restrict the speech.
- Step 3: If no such steps are available, the Institute will ensure that any restriction is prescribed by law and proportionate under <u>Article 10 of the European Convention on Human Rights.</u>
- In assessing events, the Institute will consider relevant legal and regulatory duties, including the <a href="Equality Act 2010">Equality Act 2010</a>, the <a href="Counter-Terrorism and Security Act 2015">Counter-Terrorism and Security Act 2015</a> (Prevent Duty) and public order considerations. Where there are reasonable grounds to believe unlawful activity may occur, the Institute may impose conditions or refuse the event. Conditions may include, for example, implementing security measures, appointing an independent Event Chair (see below) or imposing limits on the number of attendees.
- 8.8 The Institute will work with Dyson Technology security to ensure that events are able to proceed safely. In exceptional cases where proportionate security measures are required and cannot otherwise be met, the Institute may require the Principal Organiser to meet some or all of the security costs.
- 8.9 An Event Chair may be appointed to uphold lawful free speech and maintain good order during the event. An Event Chair must act impartially and allow lawful challenge and debate.
- 8.10 The Institute may intervene or terminate an event in progress if there is evidence or reasonable suspicion that the bounds of lawful free speech are being exceeded, or if there is a serious unmanaged risk to safety, public order or property.
- **8.11** Events will only be cancelled in exceptional circumstances. These include situations where there is a clear and substantiated inability to mitigate serious risks to safety, public order, or lawful free speech. Events may also be cancelled where there are reasonable grounds to believe that the event is likely to involve unlawful speech or conduct, incitement to violence or hatred, or a breach of the peace.
- **8.12** Any cancellation must be approved by the Registrar (or delegate).
- **8.13** Appeals against event refusals or cancellations must be submitted in writing within 5 calendar days to the Director of the Institute. The Director of the Institute's decision is final within the Institute and will be reported to the next meeting of the Institute's Governing Body.

### 9.0 Social and Electronic Media

9.1 The principles of Freedom of Speech and Academic Freedom within the law apply to the use of electronic and social media and the Institute requires responsible and legal use of the technologies and facilities available to its staff and students including the use of the internet, e-mail and social media. The Dyson Institute operates in line with the <a href="Dyson Global Social Media Policy">Dyson Global Social Media Policy</a> but in specific incidents, the Institute retains the right to overrule that policy where free speech needs to be protected, and/or to prevent unnecessary disciplinary action.

# 10.0 Handling of Harassment in Relation to Freedom of Speech

- 10.1 The Dyson Institute is committed to providing a safe and inclusive environment for all members of its community, where harassment and sexual misconduct are not tolerated. The Institute's published <u>Harassment and Sexual Misconduct Policy</u> sets out our approach to this.
- **10.2** At the same time, the Institute equally upholds the vital principles of Freedom of Speech and Academic Freedom, recognising these as fundamental to higher education and the pursuit of knowledge.
- **10.3** The Institute will approach matters related to harassment and sexual misconduct with the following guiding principles:

### 1. Clear Definitions and Consistency:

The Institute will maintain clear definitions of harassment and sexual misconduct in its Harassment and Sexual Misconduct Policy. In handling concerns or allegations, these definitions will be applied consistently and with respect for individual rights and freedoms. Decisions will always be undertaken with careful consideration of how they interact with the duty to uphold Freedom of Speech within the law.

#### 2. Protecting Debate and Academic Discourse:

Investigations and decision-making with regards to allegations of harassment or sexual misconduct will give the required weight to the importance of lawful Freedom of Speech and Academic Freedom. The Institute recognises that expressing controversial, challenging, paradoxical, or even offensive views in educational contexts—when done lawfully—is a protected aspect of both Freedom of Speech and Academic Freedom. There is therefore a presumption that participation in vigorous academic debate, or exposure to uncomfortable or contentious ideas, does not in itself constitute harassment.

### 3. Proactive Communication and Training:

All staff involved in making decisions related to harassment and sexual misconduct (including disciplinary

decisions) will receive regular, up-to-date training on the Institute's obligations to protect both Freedom of Speech and the well-being of its community. This training will clarify the boundaries between protected speech and unlawful conduct, ensuring staff are equipped to make well-informed, balanced decisions.

### 4. Procedural Fairness and Transparency:

Procedures for reporting, investigating, and resolving allegations of harassment and sexual misconduct will be transparent and accessible. The process will explicitly address how considerations of Freedom of Speech are weighed in each case, and clear rationales will be provided for decisions, especially where speech or expression is a relevant factor.

As part of our commitment to Freedom of Speech, and in line with our obligations under the Higher Education (Freedom of Speech) Act 2023, the Dyson Institute confirms that it does not enter into non-disclosure agreements as a result of complaints made to the Institute or to Dyson in relation to sexual misconduct, bullying or harassment.

## 11.0 Concerns and Investigation Process

- 11.1 This section outlines the Institute's approach to concerns and investigations relating to Freedom of Speech, in accordance with the Higher Education (Freedom of Speech) Act 2023 and OfS Regulatory Advice 24.
- 11.2 If an individual believes their Freedom of Speech has been restricted at the Institute, they have the right to raise a concern.
- 11.3 Principles
  - The Institute affirms that lawful speech will not be subject to investigation solely because it is offensive or unpopular.
  - The concerns process must not be used to penalise or chill lawful expression.
  - Anonymous reporting mechanisms will not be used to initiate disciplinary action.
  - The Institute will not encourage complaints about the lawful expression of viewpoints.
- 11.4 Concerns can be sent by email to <u>studentcases@dyson.com</u> by internal or external respondents. Internal complaints can also be submitted using the Complaints and Concerns Portal on The Hub.
- 11.5 Matters will be investigated using the Institute's standard complaints procedures which are in line with OIA expectations. These are available on The Hub and the Institute's website.

- 11.6 When considering submitting a concern, submissions are encouraged to follow the following guidance:
  - 1) Check the Institute's Code of Practice: to understand what protections and procedures are in place.
  - 2) Use the Correct Complaints Procedure: Submit your concern through either <a href="mailto:studentcases@dyson.com">studentcases@dyson.com</a> or the Complaints and Concerns Portal, which is available to internal members only.
  - 3) Identify the Issue Clearly: Be specific about what happened, who was involved, when and where it occurred, and how your Freedom of Speech or Academic Freedom was restricted.
  - 4) Gather Evidence: Collect any relevant documents, emails, recordings, or witness statements that support your concern.
  - 5) Be Clear and Respectful: Focus on facts and how your rights were affected. Avoid inflammatory language.
  - 6) Expect a Triage Process: Your concern will be assessed to determine if it relates to