



**Figure 1.** *The limits to freedom of expression (Keen & Georgescu, 2016)*

To make this more specific, the Rapporteur of Minority issues of the United Nations (UNHRC, 2015) differentiates three types of hate speech expression: (a) expression constituting an offence under international law that can be prosecuted criminally (the red circle presented in the No Hate Speech schema above); (b) expression not criminally punishable but that may justify a restriction and a civil suit (the smaller black circle of the above schema); and (c) expression that does not give rise to criminal or civil sanctions but still raises concerns in terms of tolerance, civility and respect for others (the bigger black circle of the schema). By contrast, forms of expression such as satire or objectively based news reporting and analysis – even if it offends, hurts or distresses – are typically excluded from any hate speech definition (see for example Recommendation No 15 from the ECRI (2016)).