Counter-terrorism on campus: English universities' engagement with the Prevent duty



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Abstract

The present study explores how English universities respond to their legal obligation to prevent people from being drawn into terrorism. Several scholars have argued that the Prevent duty securitises universities. Specifically, they have raised concerns that the obligation to spot and report signs of radicalisation, combined with practices aimed at shielding university members from potentially radicalising thoughts, stands in direct opposition to universities' primary function to foster critical debate, freedom of speech, and academic freedom. Such scholars have also suggested that the duty may encourage university administration and scholars to spy on and discriminate against their Muslim students in particular. However, scholarship that actually investigates how universities have implemented the Prevent duty is still scarce. In turn, we currently lack empirical evidence that allows for an in-depth insight into universities' enactment of Prevent, and into the extent to which they have become securitised as a result of their duty.

Drawing on a comparative case study comprised of over seventy policy documents, interviews with twenty-one Prevent committee members from seventeen universities, and three Regional Prevent Coordinators (RCs), this thesis explores (1) how English universities respond to the objectives of the Prevent duty, and (2) whether they engage in securitising activities through their enactment of Prevent. Combining securitisation theory with Ball's theory of policy enactment and Lipsky's understanding of 'street-level bureaucracy', the thesis evaluates whether Prevent has generated 'university securitisation'.

My findings show that RCs have reacted to universities' initial rejection of Prevent by appealing to institutions' culture of care towards their students. However, in their effort to de-securitise Prevent by highlighting the duty's safeguarding focus, the RCs have contributed to a conflation of safeguarding and security. Vulnerable individuals are not only perceived as potential victims, but also as potential threat sources, who, if left without intervention, will inevitably engage in violent extremism and terrorism. Consequently, Prevent does not merely consist of practices that are traditionally subsumed under welfare and care activities.

My empirical investigation of universities' approaches to enacting Prevent as part of their safeguarding, external speaker, and IT policies and procedures provides compelling evidence for the conclusion that some universities have been drawn into the security apparatus of the state by engaging in proactive online surveillance and censorship and by carrying out increased intelligence exchange with law enforcement agencies. However, other universities seem to have largely rejected the securitising move by challenging the perception of students as potential threats, and by limiting their Prevent delivery to previously established safeguarding and wellbeing activities. The majority of my participants' accounts suggest that their institutions lie somewhere in between these two poles, having accepted certain narratives and practices and rejected others. The study thus argues that securitisation is a nuanced and complex process that does not only differ across institutions, but also within policy areas.

In particular, the study finds that universities have different 'risk profiles' which are shaped by interconnected factors associated with universities' student demography, location, prestige, size, and governance. Most notably, the risk of radicalisation on campus is associated with increased extremist activities in universities' local environments, and the prevalence of socio-economically disadvantaged and 'diverse' students (e.g. Muslim students, especially those with conservative views and ties to local communities). Those factors converge with universities' reputation, as the research-intense, prestigious pre-1992 universities are well known to host the least diverse and most advantaged students in the country. The study finds that universities' divergent characteristics and risk profiles either widen or limit their scope for autonomy and thus for resisting securitisation.

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1. THE IMPLEMENTATION OF PREVENT IN ENGLISH UNIVERSITIES

1.1. INTRODUCTION

1.1.1. Setting the scene

With the launch of its Prevent policy in 2003, the UK government became a global pioneer in Preventing/Countering Violent Extremism (P/CVE). Prevent is part of the wider government counter-terrorism strategy CONTEST, which is aimed at tackling the 'ideological challenge of terrorism and preventing individuals being drawn into terrorism' (Home Office, 2011, para. 3.2.1). Kundnani and Hayes (2018) find that in the decade after 2003, 'the UK's PVE policy became the most elaborate and well-founded counter-extremism policy in the world, and a key reference point for the globalisation of CVE policy making' (p. 7). However, when compared to most countries and international organisations, who continue to focus on countering *violent* extremism, the UK's approach is distinctive in two ways. First, by introducing a definition of extremism that includes 'non-violent opposition to fundamental British values', Prevent operates in a specific 'pre-crime space' that 'targets non-violent extremism, such as mere thought or expression' (Zedner, 2021, p. 5). Second, since 2015, the Prevent policy functions by legally obliging public institutions to identify and report individuals they consider 'vulnerable' to or 'at risk' of being drawn into terrorism to law enforcement agencies. In practice, this means that institutions such as universities, Further Education colleges, schools, and the NHS have to report to local safeguarding teams or to the police those whom they deem 'extreme', even if no evidence of criminal activity or intent is present.

The UK government's unparalleled move not only to focus on thought and expression, but also to assign legally binding responsibilities to institutions such as universities continues to spark heated debate. Prevent was greeted with a high amount of criticism from students, academics, and university governance, many of whom urged the government to withdraw the duty from the higher education sector. In these critics' view, the obligation to spot and report signs of vulnerabilities related to radicalisation, and practices aimed at shielding university members from potentially radicalising thoughts (expressed by external speakers, and featured in online material and text), stands in direct opposition to universities' primary function to foster critical debate, freedom of speech, and academic freedom. Scholars and students alike have

expressed concerns that compliance with Prevent forces universities to spy on and discriminate against Muslim students, to curtail legal expression, and to compromise their institutional autonomy. In particular, several scholars maintain that Prevent has drawn universities into the security apparatus of the state.

An emerging body of literature addresses the problems associated with Prevent, and highlights the potentially damaging impact of Prevent on Muslim students' educational experiences and on the relationship between students and academics. However, scholarship that actually investigates how universities have implemented the Prevent duty is still sparse. Most of the existing accounts of universities' engagement with Prevent are theoretical or predictive interpretations of the implications of Prevent for the higher education sector. Empirical explorations of universities' policy implementation have relied on a thin evidence base, which does not provide sufficient insight into universities' on-the-ground enactment of Prevent. In addition, several (predictive and empirical) accounts that investigate universities' enactment of Prevent treat higher education institutions as a largely homogenous entity, which ignores UK universities' highly diverse structures (see §§1.2.4 and 1.2.5 below).

In response to the lack of evidence that allows for in-depth insight into how universities have responded to Prevent, this thesis aims to supply the empirical data required to answer the following research questions:

1. How have English universities responded to the objectives of the Prevent duty?
2. Have universities become securitised through their enactment of Prevent?

In order to answer these questions, the thesis

a) analyses the rhetorical discourse that state representatives have used to persuade universities to play a role in preventing vulnerable individuals from being drawn into terrorism.
b) examines how universities have translated the Prevent legislation into higher education policies and on-the-ground practices.
c) explores the factors that shape universities' enactment of Prevent, including the justification, values, and beliefs that inform their actions.

1.1.2. A note on the terminology and concepts employed in this study

The government refers to higher education institution (HEIs) which are obliged to comply with the Prevent duty as 'Relevant Higher Education Bodies' (RHEBs) or Higher Education Providers

(HEPs). This includes all 389 providers currently registered with the Office for Students (OfS). Besides universities, those include drama, dance and music schools, colleges, and conservatoires and other higher education colleges which have not been granted the name of 'university'. This research project exclusively focuses on English HEPs which have been granted the 'university' name, and which possess the power to award research degrees. For the purpose of this thesis, they will be exclusively referred to as 'universities'.

Regional Higher Education Prevent Coordinators, also referred to as Regional Coordinators or RCs, are state representatives who play a key role in universities' delivery of Prevent, specifically through the provision of guidance and assistance in interpreting, translating and implementing the Prevent duty within the context of each institution. Moreover, RCs facilitate the coordination between stakeholders involved in the delivery of Prevent and help universities to understand the regional threat and risk factors relevant to Prevent (UUK, 2019).

The study frames the implementation of the Prevent duty specifically within the process of policy 'enactment' (Ball, 2011, 2012). In accordance with Ball's theory of policy enactment (see §2.1) universities' responses embrace a variety of activities that inform the interpretative process of 'decoding' and 'recoding' governmental policies and legislation in order to develop and implement policies and regulations with view to an institution's individual culture and context. Further drawing on Lipsky's understanding of 'street-level bureaucrats', the study also focuses on how those higher education policies and procedures are enacted on the ground. In this way, the thesis draws a distinction between 'policy enactment' and 'on-the-ground enactment'.

1.1.3. Thesis structure and main arguments

The thesis is composed of seven chapters. The subsequent portions of this first chapter draw out the legal and regulatory framework of the Prevent duty. Relying on a review of governmental policies and guidances, speeches and media articles, I explore the government's arguments for legally incorporating universities into their counter-terrorism strategy. I then review literature concerned with the relationship between education and security under Prevent, and existing studies focused on the reception and implementation of Prevent in the higher education sector. Subsequently, I locate the present research within the existing scholarship on the intersection of education and security, and on the implementation of Prevent.

As I will show in Chapter 2, which sets out the theoretical framework and the research design of this study, one major ambition of this study is to evaluate whether universities' enactment of Prevent has led them to assume a securitising role. Drawing a conceptual distinction between traditional welfare-oriented safeguarding and securitised safeguarding

activities, I define securitisation as a combination of actions and justifications through which universities assume the role of state actors by carrying out activities that identify and report individuals and groups that are perceived to be an existential threat to society. In order to qualify as a securitised activity, such actions have to move beyond the realm of universities' traditional safeguarding measures. As opposed to securitised activities, traditional safeguarding measures are not exclusively designed to respond to the threat posed by radicalisation – but to tackle wider wellbeing issues. Chapter 2 will draw out in more detail the threshold for securitising activities.

This understanding of securitisation as a set of activities and justifications is informed by a securitisation theory that distinguishes between the securitising move – a speech act or argumentative technique that frames universities and university members as (in danger of) radicalising influences – and securitisation itself, which requires that the addressees of the securitising move (the enabling audience) accept the threat perception and act accordingly by introducing measures to mitigate the perceived threat (through policy enactment). In turn, the project is designed to shed light into universities' enactment of Prevent, and into the justifications and understandings that inform their policies and on-the ground responses.

The thesis relies on a comparative case study design that captures in detail seventeen English universities' enactment of Prevent. A triangulation of empirical data derived from documents and from in-depth interviews with twenty-one Prevent committee members allows for the first systematic evaluation to date of universities' involvement in securitisation processes under Prevent. The findings are presented in the third, fourth, fifth and sixth chapters. Chapter 3 analyses how the relationship between universities and Regional Coordinators shapes universities' delivery of Prevent. It shows that RCs responded to the high levels of criticism and suspicion towards Prevent amongst university governance by appealing to universities' culture of care towards their students. In their capacity as universities' advisors in the delivery of Prevent, they aimed to de-securitise Prevent by highlighting its singular emphasis on safeguarding. However, they continued to emphasise a dual conception of vulnerable individuals as 'at risk' *and* as 'the risk' by relying on the narrative that susceptibility to radicalisation, if left without intervention, inevitably manifests itself in violent extremism and terrorism. In turn, this narrative reinforced a conflation between safeguarding and security under Prevent: the RCs relied on various rhetorical strategies to frame the numerous different risk mitigations they advised universities to implement as 'safeguarding' practices. Several of those safeguarding measures provide a means for universities to engage in traditional security measures of surveillance and intelligence exchange. At the same time, the interviews uncovered that audience acceptance with the securitising move varies greatly across the sector, which is reflected in variations in the extent to which university policy actors adapt the proposed means to comply with Prevent. According

to the RCs factors associated with the risk perception and cultural differences of universities, in particular between pre-1992 and post-1992 universities, seem to shape their attitudes as well as their enactment of the Prevent duty on a policy level and in practice.

Chapter 4 explores the various factors that shape universities' compliance with and acceptance of Prevent in more detail by focussing on the development of universities' risk assessments and action plans, and on their approach to safeguarding under Prevent. The collected evidence reveals that although all universities are compliant with Prevent, they display different levels of engagement with the duty, which in turn has implications for the extent to which universities have assumed security roles. The chapter shows that universities' threat perception varies greatly. In turn, an institution's understanding of the imminence of the threat posed by extremist radicalisation shapes their attitude towards and compliance with their responsibilities under Prevent. In particular, I find that factors associated with a university's location, student demography, and prestige converge to shape its risk perception, which in turn made an impact on the extent to which they were accepting of their responsibilities under Prevent. Prestigious universities which host a socio-economically privileged student body consider themselves as at lower risk of radicalisation, which provides them with more autonomy in their delivery of Prevent, and in some cases has led to reduced engagement. Conversely, those with a heightened threat awareness were more accepting of their responsibilities under Prevent, and appeared to be more compliance driven. While all universities were able to integrate Prevent into their existing safeguarding approach, I found that not all universities are equally willing to engage in information-sharing about their students, especially in the absence of criminal activity or the intent to engage in criminal activity. While some universities made a conscious effort to resist securitisation, others have come to function as what I call *paternalised agents of security*. For them, a prevalent culture of care has paved the way for compliance with the objective of a reframed security move whose language has shifted from an emphasis on policing strategies to safeguarding the welfare of their supposedly vulnerable students. In turn, they have engaged in tightened processes of information-sharing about perceived susceptibility to radicalisation with law enforcement agencies and security services.

Chapter 5 explores whether the enactment of Prevent in the external speaker area provides evidence for the securitisation of legal extremist views. The chapter's analysis of universities' approaches to managing controversial speakers confirms different levels of audience acceptance among those charged with the implementation of Prevent at their institutions. In particular, some participants rejected the narrative that external speakers who express legal extremist views warrant increased attention as a result of Prevent. Those who agreed that external speakers may pose a realistic threat placed emphasis on the role of mitigating activities, especially

on procedures that ensured that the university was able to provide balanced debate and to counter extremist views. The interviews revealed that most participants were able to balance their free speech obligations with their Prevent duty, and several participants even suggested that Prevent has led to more rigorous approaches to upholding free speech. Overall, the chapter suggests that my participants' understanding and enactment of Prevent was primarily informed by their effort to uphold free speech and to allow the expression of legal extremist views. Their implementation of Prevent on the ground suggests that Prevent has not led to the securitisation of legal extremist views expressed by external speakers (at least not at the universities under investigation). At the same time, several interviews suggested that Prevent is prone to misconceptions and to an overzealous application of mitigating procedures to manage external speakers, which highlights the duty's potentially negative effect on academic debate.

Chapter 6 investigates universities' approaches to monitoring and blocking access to extremist online material under Prevent. The chapter finds that several universities' policy documents do not adequately reflect their on-the-ground enactment. Only after conducting the interviews was I able to uncover universities' wide range of approaches to web filtering and monitoring. The findings show that only three universities refrained entirely from any means of online surveillance under Prevent. In contrast, eleven universities have used or are willing to use their existing IT structures to access individuals' online activity to reactively investigate concerns about radicalisation, and three universities developed comprehensive, proactive online surveillance mechanisms that enable them to monitor access to extremist material. A similarly wide range of approaches was found when it came to blocking extremist online material: eight universities decided to block access to extremist material under Prevent, while the other nine institutions refrained from doing so. The chapter shows that universities' approaches to blocking and monitoring are heavily informed by converging factors associated with institutions' size, student demography, locality, decision-makers, culture and values, research activity, prestige, and risk perception. The analysis of universities on-the-ground enactment and their justifications for their approaches to Prevent highlights that not all universities are equally 'securitised' as a result of Prevent. In particular, universities' approach to reactively monitoring individuals' online activities in order to establish whether they are at risk of radicalisation confirms that the conflation of safeguarding and security has informed some universities' enactment of Prevent. Some cases provide compelling evidence for the claim that universities have been drawn into the security apparatus of the state, not only by virtue of accepting and perpetuating the dominant securitisation discourse, but also through their enactment of policies that go well beyond safeguarding by engaging in proactive online surveillance and intelligence exchange with law enforcement agencies. In contrast, others have fully rejected the securitising move by challenging

the perception of students as potential threats and by limiting their Prevent delivery to previously existing safeguarding and wellbeing structures. Other institutions lie between these two extremes, having accepted certain narratives and rejected others (for example, they may accept their students' vulnerabilities and therefore censor extremist material, but refuse to monitor their online activities).

The final, concluding chapter discusses the implications of my findings for the securitisation of education. My study reveals that securitisation is a nuanced and complex process that does not only differ across institutions, but also within policy areas. For example, some universities may resist the securitisation of legal speech by insisting on a liberal approach to external speakers, but at the same time introduce new approaches to surveilling their students' online activities. Any generalised claims about the 'securitisation of education' thus do not hold up to rigorous empirical enquiry. The study also finds that securitisation is a highly contextual process and that not all universities have similar means for refraining from engaging in securitised activities. In particular, various interconnected factors associated with institutions' student demography, location, prestige, size, and governance shape universities' risk perception and their pressure to comply, and in turn either widen or limit their scope for autonomy and thus for resisting securitisation.

1.2. Literature Review

1.2.1. The Counter-Terrorism and Security Act's Prevent Duty

Prevent, as one component of the wider counter-terrorism strategy called CONTEST, has three objectives. These are:

> to respond to the ideological challenge of terrorism and the threat we face from those who promote it; prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and work with a wide range of sectors and institutions (including education, faith, health and criminal justice) where there are risks of radicalisation which we need to address' (Home Office, 2011, para. 7.2).

Section 26 of the 2015 Counter-Terrorism and Security Act (CTSA) 2015 places a duty on certain public and other bodies, referred to as 'specific authorities', in the exercise of their function, to have 'due regard to the need to prevent people from being drawn into terrorism' (HM Government, 2015a). These specific authorities include 'relevant higher education bodies (RHEBs; listed in Schedule 6 subsection 4 of the Act), which according to section 32(2) 'must

give the monitoring authority any information that the monitoring authority may require for the purpose of monitoring that body's performance in discharging the duty imposed by section 26(1)' (HM Government, 2015a).

In 2015, the government appointed HEFCE to monitor the implementation of Prevent across the English higher education sector, and on 3 April 2017, this role was formally delegated to the newly established OfS. The government provides an overview of the policies and procedures that universities ought to implement to achieve compliance in three different types of documents: the yearly Prevent duty monitoring frameworks for the higher education sector (HEFCE, 2015, 2016, 2017c; Office for Students, 2018b), as well as 'the two sets of statutory guidance which should be read alongside [the Monitoring Frameworks] and considered when implementing the duty' (HEFCE, 2015, para. 9). Those two sets of guidance are the general *Revised Prevent Duty Guidance for England and Wales* (HM Government, 2015c), which applies to all public sector institutions that are covered by the duty, and the *Prevent Duty Guidance: for higher education institutions in England and Wales* (HM Government, 2015b). The first *Prevent Duty Monitoring Framework for the Higher Education Sector*, issued in November 2015, emphasises the most relevant paragraphs of the *Revised Prevent Duty Guidance: for England and Wales* (HM Government, 2015c) that universities are expected to consider in order to comply with the duty. The guidance explains that 'due regard' means that 'authorities should place appropriate weight on preventing people being drawn into terrorism when considering all the other factors relevant to carrying out their formal functions' (para. 4), and links the duty to the government's Prevent strategy objectives (para. 6). The guidance defines extremism as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of different faiths and beliefs' (para. 7) and emphasises that 'preventing people from being drawn into terrorism requires challenging extremist ideologies' (para 8). Moreover, all specified authorities 'should demonstrate awareness and understanding of the risk of radicalisation in their area or institution' (para. 13).

The guidance also addresses information-sharing practices that apply to all specified authorities. Paragraph 21 states that the 'Prevent programme must not involve any covered activity against people or communities'; however, 'specified authorities may need to share personal information to ensure, for example that a person at risk of radicalisation is given appropriate support'. Data-sharing should rely on the principle of consent and consideration of the Data Protection Act 1998 and the Human Rights Act 1998, as well as the necessity and proportionality of information sharing based on professional judgement (paras 22, 23). The

guidance also draws out the thematic policy areas in which all of the sectors are expected to implement the Prevent duty, namely 'effective leadership, partnership working and awareness training' (paras 15–20).

The Prevent Duty Guidance: for higher education institutions in England and Wales (HM Government, 2015b) addresses the particular considerations and approaches of implementing Prevent that are unique to RHEBs' contexts (paras 1, 2). As opposed to other public sector institutions like schools and the NHS, RHEBs are expected to have policies and procedures related to external speakers and events. Here the guidance for RHEBs recommends that 'external speakers or events should not go ahead if risks cannot be fully mitigated' and that relevant information about speakers should be shared with other institutions (paras 7–14). Moreover, senior management is expected to 'actively engage with partners, including the police, the Prevent Coordinators, and students' (paras 16–18), and to establish risk assessments which reflect considerations of how and where students might be drawn into terrorism as well as violent and non-violent extremism. Subsequently, RHEBs are required to address those risks in their student, staff and welfare policies, in event policies and procedures, and in action plans (paras 19–21). RHEBs are furthermore advised to train relevant staff (para. 22), establish internal mechanisms and external agreements for information sharing about vulnerable people (para. 23) and to develop welfare, pastoral care, and chaplaincy support systems which should be reflected in their policies (paras 25, 26). The guidance also mandates that RHEBs incorporate the Prevent duty within their Information Technology policies, where RHEBs are requested to consider the use of filtering arrangements and procedures in relation to access to security-sensitive online material (paras 27, 28). Finally, RHEBs should develop policies that address student unions' activities on campus, with the guidance suggesting that RHEBs provide awareness training for student unions, although they are not covered by the Prevent duty (paras 29–30).

The yearly monitoring frameworks for the higher education sector draw out how HEFCE and subsequently the OfS 'assesses whether the action plans, policies and processes set out by each RHEB take account of the topics covered in both sets of statutory guidance and are sufficient to respond to the issues identified in their own risk assessment' (HEFCE, 2015, para. 10). The first *Prevent duty monitoring framework for the higher education sector* (HEFCE, 2015) covers the initial phase of monitoring where universities were required to submit a report that summarised the institution's arrangements for 1) senior management and governance oversight of the implementation, including Prevent Partner engagement; 2) the engagement and consultation of students regarding the implementation of Prevent; 3) staff training; 4) information sharing practices; 5) external speaker arrangements; 6) pastoral and chaplaincy support; 7) IT

policy arrangements; and 8) student union engagement (HEFCE, 2015, para. 32). Moreover, RHEBs were asked voluntarily to provide data about the number of people referred and accepted to the Channel programme, the number of events and speakers that were considered as part of Prevent, the number of staff who received Prevent-related training, and the nature of this training (HEFCE, 2015, para. 33).

The 'ongoing monitoring' requirements of the second phase include annual reports of the implementation of the Prevent duty. Here data on Channel referrals, events and speakers, and staff training were imperative (HEFCE, 2016, para. 38). The second phase aims to 'take a risk-based approach to intervention', where 'ongoing monitoring will be focused not only on whether providers have the right policies and processes in place, but primarily on evidence of active and effective implementation and sharing of good practice' (HEFCE, 2016, para. 22). Evidence for compliance covers data and examples pertaining to staff training, high-risk events, internal and external sharing mechanisms for welfare concerns with Prevent Coordinators, Local Authority Prevent Leads or Police Prevent teams, and formal Channel referrals. The *Updated framework for the monitoring of the Prevent duty in higher education in England* (2016) furthermore introduces 'Prevent reviews', which are face-to-face meetings or visits that are 'triggered in response to particular circumstances or risk indicators', including 'concerns about... [an institution's] annual reports, such as lack of evidence, weak evidence, or data which indicates significant issues' as well as serious incidents, previous concerns, and serious concerns raised by the DfE or the Home Office (HEFCE, 2016, para. 49). The *Framework for the monitoring of the Prevent duty in higher education in England 2017 onwards* describes the third and last cycle monitored by HEFCE, emphasising that they continue to collect data 'to support and enhance the narrative we are developing on the sector's implementation of the duty' (HEFCE, 2017c, para. 36).

Following the transition from HEFCE to the OfS, the *Framework for the monitoring of the Prevent duty in higher education in England 2018-19* introduced a new accountability and data return (ADR), which includes 'outcome-based data returns supported by a short qualitative narrative covering core areas of the statutory duty, such as staff training, welfare concerns, and external speakers and events' (Office for Students, 2018a, para. 42). The OfS also introduced the distinction between universities at 'low risk' or 'high risk' of compliance failure as part of their 'heightened engagement approach'. This means that providers who are 'assessed to be at higher risk of not demonstrating due regard to the duty will be subject to heightened engagement from the OfS compared with providers assessed as lower risk' (Office for Students, 2018a, para. 26). The OfS furthermore aims to integrate the Prevent duty and the Higher Education Research Act

'so that the two regulatory activities do not operate in isolation', and emphasises that 'the OfS' role as Prevent monitor forms a core component of its wider remit to support and champion the wellbeing of students' through an heightened focus on general welfare concerns as part of their Prevent monitoring practices (Office for Students, 2018a, para. 28). Finally, the OfS draws 'on external sources of data, information and intelligence to assess risks' and encourages 'more formal information-sharing mechanisms among Prevent partners to assess and manage risks and target resources accordingly' (Office for Students, 2018a, para. 34).

The OfS maintains that the refusal to 'give to the monitoring authority any information that the monitoring authority may require for the purposes of monitoring that body's performance in discharging the Prevent duty' (CTSA 2015, section 32 (2)) does not necessarily constitute 'a breach of the Prevent duty in itself'. However, 'the absence of information and the necessary assurances to positively demonstrate that the provider has had due regard to the Prevent duty could result in the OfS making a judgement of non-compliance' (Office for Students, 2018a, para. 89). The OfS goes on that 'non-compliance with our monitoring authority requirements in respect of Prevent could also indicate wider regulatory failure with the provider's conditions of registration e.g. public interest governance conditions (section 12(1)(b) HERA)' which can lead to 'the imposition of formal sanctions such as monetary penalties, suspension or deregistration (section 15, 16 and 18 of HERA)' (Office for Students, 2018a, para. 92).

Despite the prescriptive and comprehensive monitoring framework in which universities are expected to translate their legal obligations into higher education policies and practices, they are also ostensibly granted high levels of autonomy in the way in which they implement Prevent. For example, HEFCE acknowledges that 'as autonomous bodies, it will be for providers to decide how to best implement their responsibilities' and recognises that 'RHEBs are diverse in nature, varying greatly in size, structure and culture; they will need to interpret the statutory guidance in their own context' (HEFCE, 2015, para. 10). At the same time, HEFCE expects institutions to convey 'the rationale behind particular decisions. If an organisation considers that a part of the statutory guidance does not apply, we will expect it to be able to justify that opinion. Equally, if an organisation considers that it needs a particularly strong policy because of a particular local risk factor, we wish to understand the rationale' (HEFCE, 2015, para. 15).

In a similar vein, the *Updated framework for the monitoring of the Prevent duty in higher education in England* (2016) and the *Framework for the monitoring of the Prevent duty in higher education in England 2017 onwards* set out that since 'the duty should be implemented proportionately... this evidence looks different for different providers depending on their particular context. It will be up to institutions to determine what information is appropriate to

include in this report' (HEFCE, 2016, para. 36, 2017, para. 37). Equally, the OfS emphasises its contextual approach to monitoring and aims to 'ensure providers' individual contexts are taken into account and that there is not a "one size fits all' approach' (Office for Students, 2018, para 34).

1.2.2. Prevent as a securitising move? Justifications for incorporating universities into the Prevent legislation

In order to gain a deeper understanding of the factors that shape universities' response the Prevent duty, this section draws out the discursive elements and truth claims used in Prevent policy texts, mainly in the *Prevent Duty 2011*, the *Revised Prevent Duty Guidance for England and Wales* (2015) and the *Prevent Duty Guidance: for higher education institutions in England and Wales* (2015), as well as speeches published by the Home Office and media coverage in order to justify the incorporation of universities in the Prevent duty.

There are several arguments which emphasise the security risk in higher education and provide the justification for incorporating universities in the Prevent duty. The first subject of securitisation is ideology. Framed as the precondition for radicalisation, extremism, and eventually terrorism, the Prevent agenda emphasises the threat deriving from the development of dangerous thoughts. The strategic objective of the Prevent agenda is to 'respond to the *ideological* challenge of terrorism and the *threat* that we face from those who promote it' (HM Government, 2015b, para. 6 – my emphasis). The identification of ideology as a risk is justified on the grounds that 'terrorist groups often draw on extremist ideology' (HM Government, 2015b, para. 7).

This attitude ultimately places the person who holds or could develop those thoughts in the focus of securitisation, which leads to the second argument: that young people are particularly vulnerable to be 'exploited by radicalising influences' (HM Government, 2015b, para. 19). This argument resonates with Neumann's (2007) study for the European Commission, which finds that 'universities were places of vulnerability... because you get people of a certain age, often away from home for the first time, often feeling quite lost and often experiencing a sort of crisis of identity and so on. That makes it easy for extremist groups to pick them up' (Home Affairs Committee, 2012, para. 31). The *Prevent Strategy* (2011) states that the government believes that 'there is unambiguous evidence to indicate that some extremist organisations, notably Hizb ut-Tahrir, target specific universities and colleges (notably those with a larger number of Muslim students) with the objective of radicalising students' (HM Government, 2011, paras 10.61, 10.66). This 'unambiguous evidence' is partly based on an analysis carried out by the Henry Jackson

Society which highlighted some cases where individuals involved in acts of terrorism were senior members of universities' Islamic Societies, radicalised on campus or studied at universities (Home Affairs Committee, 2012, para. 26).

In this way, young people are not only framed as *at* risk, they are also perceived as *the* risk, as they '...continue to make up a disproportionately high number of those arrested in this country for terrorist related offences and those who are travelling to join terrorist organisations'. For this reason, the government expects universities to be 'vigilant and ware of the risk' posed by their students, who are mainly young people (HM Government, 2015c, para. 1). In 2010, the Centre for Social Cohesion published their finding that 35% of British terrorist convicts had studied at a higher education institution (Simcox, Stuard and Ahmed, 2011, p. 329). This was another study that informed the government's 2011 Prevent Strategy, which states that 'students appear to have been attracted to and influenced by extremist ideology while at university and engaged in terrorism-related activity after they had left', and particularly refers to 'the person responsible for the attempted bombing on an aircraft over Detroit on Christmas Day 2009', who was a student at UCL (HM Government, 2011, para. 10.63). Throughout the governmental policy documents, the risks stemming from ideology and young people are linked to the risk that university campuses pose to national security.

Academics associated with the neoconservative/right-leaning think tanks the Social Affairs Unit and the Centre for Social Cohesion/Henry Jackson Society argued that universities are likely to be major sites of extremism, radicalisation and recruitment (Glees and Pope, 2005; Sutton, 2015). Glees (2011) has labelled universities as 'breeding grounds of terror', a metaphor that has been frequently picked up by the media, and which has become a central justification for the government's need for new legislation and subsequent intervention in the higher education sphere. For example, in June 2011, Theresa May told the *Daily Telegraph* newspaper that 'I think for too long there's been complacency around universities. I don't think they have been sufficiently willing to recognise what can be happening on their campuses and the radicalisation that can take place'. She concluded that 'there is more that universities can do' (BBC, 2011). A day later, the *Telegraph* issued an article titled 'Universities: The Breeding grounds of terror', where Glees emphasised that politicians have long acknowledged the threat of radicalisation on university campuses. He drew on May's comments, as well as on David Cameron's speech on security and radicalisation in February of the same year, in which the then Prime Minister insisted that 'we must stop extremist recruiting in publicly funded institutions like universities' and complained that universities had been 'deaf' to the government's urges (Glees, 2011).

Subsequently, the government questioned whether universities were doing enough to contribute to the public good of national security and introduced their rationale for new legislation. In 2014, Theresa May again stressed that radicalisation was taking place not only 'in mosques, homes and community centres, but also in schools, universities and prisons', and introduced the reformed Prevent agenda, which obliges 'universities... to put in place extremist speaker policies'. She concluded that 'where organisations consistently fail, ministers will be able to issue directions to them – which will be enforceable by court order' (Home Secretary, 2014). The idea that universities should be legally obliged to participate in the Prevent agenda envisaged a more rigorous intervention in higher education policy and regulations in order to address the government's concern 'that some universities have failed to engage' with their social responsibilities and have let 'terrorist ideologies and those that promote them go uncontested' (HM Government, 2011, p. 75). The government emphasised the urgency with which 'this lack of engagement must be addressed' (HM Government, 2011, p. 76) and repeatedly highlighted universities' status as publicly funded bodies and charities, and the resulting social responsibility to 'work for the public benefit' (HM Government, 2011, p. 72), which under Prevent is defined as national security. Under Prevent, universities are not merely asked to contribute to safeguarding the country's liberty and prosperity through academic activities targeted at economic development and critical discourse, but also through creating a space that shields students from radicalising influences of any kind. Framing thoughts, students and campus spaces as potentially dangerous, and prioritising national security as a public good to which universities need to contribute, are the main rhetorical strategies used to promote compliance with Prevent.

1.2.3. Universities' responses to the securitising move

Several academics have argued that the incorporation into the Prevent legislation has led universities to assume a role in preserving national security. Zedner, (2018) maintains that Prevent goes beyond the coercive 'security laws and measures of surveillance, restraint and control' that are normally exercised through the 'conventional security apparatus of state-led policing, prosecution and punishment', because it assigns 'to civil society institutions the responsibility to identify and report individuals at risk for possible referral to government de-radicalization programmes' (p. 546). This approach to 'soft power security' dilutes 'the state's primary security function by engaging the public to the tasks of countering terrorism' (Zedner, 2018, p. 546). Gearon, (2017) finds that universities 'have become a focus of security concerns and marked as loci of special interest for the monitoring of extremism and counter terrorism efforts by intelligence agencies' (p. 2). Informed by the securitisation theory developed by

Wæver, (2004), Buzan, Wæver and De Wilde (1998), and Taureck (2006), he highlights that the 'securitising move' as 'the first step in the process of securitisation' constructs and addresses an existential threat. He further acknowledges that the subsequent 'emergency actions' in response to the threat perception render the securitising move successful, leading to securitisation (Gearon, 2017, p. 4). Consequently, he maintains that as a result of Prevent, UK campuses 'can be said to have been (at least in part) securitised', and that they 'have undergone some "securitising move"' (Gearon, 2017, p. 4). In particular, he argues that Prevent resulted in 'university securitisation', because the duty requires institutions to move 'out of the sphere of "normal politics", certainly out of what are perceived to be normal university politics' (Gearon, 2017, p. 4). Interestingly however, he highlights that the securitising move 'has encountered impassioned opposition from many academic quarters, from university institutions and academic community alike' and notes that 'the issue of university securitisation' is accompanied by the 'almost universally negative response by (…) universities to the UK government's Prevent in all its manifestations' (Gearon, 2017, p. 4).

There is a particular curiosity about the argument that universities are on the one hand securitised, and on the other have rejected the securitising move. While Gearon's novel approach to applying securitisation theory to the process of incorporating universities into the Prevent agenda provides a particularly promising means to investigate the extent to which universities are securitised under Prevent, his work has not fully addressed *how* universities have moved out of the sphere of normal university politics. Although he highlights that one condition for the successful securitisation is the development of emergency actions, it is unclear whether universities have actually resorted to any securitising actions in response to Prevent. Instead, he suggests that universities have rejected the securitising move, which could imply that the securitisation attempt actually *failed*.

The present study emulates Gearon's application of securitisation theory to the study of universities' engagement with Prevent, and seeks to develop a robust framework to measure the scope of 'university securitisation' through an empirical study of universities' policy enactment. The focus of this study is thus to explore how universities respond to the securitising move outlined in §1.2.2, and to investigate if they have moved beyond their previously existing policies and procedures.

Some of the initial responses that Prevent elicited from the university sector (even before it became a legal obligation) can be found in an inquiry issued by the Home Affairs Committee in 2012, which aimed to explore the evidence base and issues around the implementation of the policy (Home Affairs Committee, 2012). Those responses were overwhelmingly critical and negative. For example, Universities UK told the Home Affairs Committee that 'simplistic

linkages have been made between violent radicalisation and the fact that an individual has attended university without acknowledgement that the radicalisation process is far more nuanced and difficult to predict' (Home Affairs Committee, 2012, para. 27). Moreover, UCL declared that internal investigations into the radicalisation of Umar Farouk Abdulmutallab, who studied mechanical engineering at the university prior to attempting to murder 289 passengers on a flight from Amsterdam, found that there was no evidence suggesting that he 'was radicalised while a student at UCL', and that 'no student support system, however sophisticated, would have drawn attention to Mr. Abdulmutallab as a potential terrorist' (Caldicott et al., 2010, para. 11).

According to Universities UK, the government did not take into account 'that the proportion of young men now participating in higher education stands at 41%, a fact that indicates that attending university may actually reduce the risk of vulnerability to violent radicalisation' (Home Affairs Committee, 2012, para. 27). Professor Geoff Petts, representative of Universities UK, emphasised that 'we are all very aware that, in an environment where we have a very large cohort of young, potentially vulnerable people, there is a threat, and we are very alert to that threat. We are acutely aware of our responsibility to those young people'. However, he added that while they 'acknowledged the threat', Universities UK did not see evidence to support the view that attending a university puts an individual at higher risk of extremism (Home Affairs Committee, 2012, para. 47). The Home Affairs Committee agreed that the specific role of universities in the process of radicalisation was not obvious and that although 'much of the uncertainty relates to the fact that a number of convicted terrorists have attended... universities, there is seldom concrete evidence to confirm that this is where they were radicalised'. They added that they were 'concerned that too much focus in the Prevent Strategy is placed on public institutions such as universities, and that it may be more accurate, and less inflammatory, to describe them as places where radicalisation "may best be identified"'. They also concluded that 'the emphasis on the role of universities by government departments is now disproportionate' (Home Affairs Committee, 2012, para. 38).

Despite such critical responses to the legal obligations under Prevent, Petts told the Home Affairs Committee that a study undertaken by Universities UK found that 'the vast majority of institutions has signed up wholeheartedly to the Prevent Strategy' (Home Affairs Committee, 2012, para. 48). He also expresses the view that Prevent is important 'because it encourages universities to engage with their communities, the police and the security authorities' and 'catalyzed universities' contributions to seeking practical solutions to these real problems' (Home Affairs Committee, 2012, ev. 49). This finding is somewhat incongruous with the response that the statutory Prevent duty received in 2015, when over 500 faculty members openly

criticized the CTSA, urging the government to withdraw the policy from the field of higher education in order to enable institutions to carry out their functions of fostering critical thought and debate (*The Guardian*, 2015). The incorporation of universities into the higher education sector has most notably received criticism regarding its 'chilling effect' on academic freedom and free speech (*The Guardian*, 2016).

An inquiry into factors inhibiting freedom of speech at universities, carried out by the parliamentary Human Rights Committee in 2018, found that according to Universities UK, Prevent has created 'a grey area in relation to free speech which previously did not exist' (House of Commons and House of Lords, 2018, para. 65). In this context, witnesses 'expressed concerns about potential lack of clarity around the use of the term 'extremism' and 'non-violent extremism' which are employed in the Prevent duty guidance and are perceived as 'problematic for securing freedom of speech' (House of Commons and House of Lords, 2018, paras 66, 67). Although the CTSA was amended by including the clause that higher education providers 'must have particular regard to the duty to ensure freedom of speech and to the importance of academic freedom' (HM Government, 2015a, para. 31), many have argued that this balancing act is particularly difficult. The legal vagueness of the duty is also reflected in the Salman Butt v Secretary of State for the Home Department law case in 2017, where the legal scope of the Prevent duty guidance was challenged. Here, Mr Justice Ouseley concluded that the Prevent duty guidance did not override the duties of freedom of speech and academic freedom. Although the guidance emphasises the need to 'fully mitigate' risks, Ouseley declared that universities can reach a decision that might be contrary to this guidance. He further found that 'if there is some non-violent extremism, however intrinsically undesirable, which does not create a risk that others will be drawn into terrorism, the guidance does not apply to it' (Brick Court Chambers, 2017). Then, in 8 March 2019, the Court of Appeal ruled that paragraph 11 of the Prevent duty guidance for higher education institutions in England and Wales was unlawful. This is the paragraph that aimed to provide guidance to universities for managing external speakers on campus. It said that universities should not allow events featuring external speakers to proceed 'if the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups' unless this risk can be 'fully mitigated' (HM Government, 2015b). The judges ruled that the section's 'trenchant' language 'is not only intended to frame the decision of RHEBs on the topic in question, it is likely to do so' (Royal Courts of Justice, 2019, para. 176). They then called for the government to introduce a 'sufficiently balanced guidance' in its place (Royal Courts of Justice, 2019, para. 176).

The criticism Prevent has faced from the university sector has sparked a variety of independent reviews and legal challenges. A majority of responses from the university sector indicate that the language that justified the government's adoption of the CTSA 2015 and the resulting incorporation of universities into the Prevent agenda has not been met with widespread audience acceptance. This is particularly true with regard to the conceptualisation of universities as 'breeding grounds for terror'. The initial review of universities' responses towards Prevent also indicates overwhelmingly negative and critical attitudes regarding Prevent's potentially chilling effect on free speech and academic freedom, as well as its legal vagueness. At the same time, the evidence drawn from University UK's survey suggests that certain elements of the language have found resonance at university governance level, at least with regard to the obligations that universities have in safeguarding their students. This implies that although the initial securitising move does not seem to have achieved universal audience acceptance, institutional responses cannot be merely understood in terms of full compliance or resistance.

1.2.4. Universities as agents of securitisation

Lowe (2017), whose work focuses on the perceptions of Prevent on the part of staff members of certain public bodies (not exclusively universities), maintains that the focus on 'extremist thought that does not directly advocate violence' renders the Prevent strategy a 'security practice that is concerned with anticipating an uncertain future' (p. 923). In addition, he argues that the definitions of radicalisation and extremism 'contained in the 2011 Prevent and the 2015 Counter-Extremism Strategy' are 'subjective, awkward, and opaque', and concludes that the 'current U.K. definition does not provide sufficient legal certainty' (p. 918). In turn, he suggests that 'this has led to a general misunderstanding and uncertainty by many staff members in the authorities as to their statutory obligation and the primary purpose for Prevent' (p. 920). Like Gearon, he highlights educators' rejecting attitude towards their legal obligation. For him, this rejection is evidenced by the 'formation of pressure groups such as "Students not Suspects", "Educators not Informants", and "Education not Surveillance"' whose aims is 'the repeal of the section 26 requirement on education establishments' (p. 920). While Lowe's critique of the Prevent duty has uncovered that some educational staff are negative about Prevent, he does not provide empirical evidence on how educators actually make sense of the legal ambiguity associated with the definition of extremism on the ground.

O'Donnell (2016) is equally critical of the Prevent duty's treatment of the concepts of extremism, violent extremism and radicalisation, especially because it seems to 'imply (...) linear causal pathways of "radicalisation"' (p. 54). In particular, she argues that Prevent has led to the

securitisation of vulnerabilities, because 'the concept of "vulnerability"' is used in this context to suggest that the 'vulnerable person may either already be, or risks becoming, an extremist, violent extremist or a terrorist'. In turn, 'the 'vulnerable individual' has become a synonym for the (potentially) dangerous individual' (p. 54). For O'Donnell, 'the language of vulnerability and resilience (…) brings discourses about well-being, safety and care to bear on issues of (national) security' (p. 58). She argues that Prevent has led to 'the securitisation of community life', because 'individuals and communities are (…) constituted as risky' and in need of interventions, and that the duty's expansion to the education sector has furthered this securitisation process because 'students may feel that voicing dissenting and critical ideas will lead them to be labelled 'at risk of radicalisation' (p. 60). Like Lowe, she maintains that the 'relatively empty definition of extremism as that of "opposing fundamental British values" combined with the conflation of intelligence and evidence in the pre-crime agenda' means that 'it is not clear what one is permitted to say without being constituted as at "risk of radicalisation" or as having "extremist" ideas' (p. 61). She also highlights that the legal ambiguity associated with the government's definition of extremism has sparked resistance across the higher education sector, and in particular among the NUS, the UCU, and the Russell Group, who have all pointed out 'the tension between the requirement by law to ensure freedom of speech and the obligation under Prevent to address non-violent extremism', as well as 'the problematic issue of referral when no illegal activity has taken place'(p. 62). However, while her paper lucidly highlights the issues associated with 'the lack of clear definition of broad terms like extremism' (p. 62) and makes a compelling case for the importance of 'preserv[ing] education's autonomy from security agendas' (p. 70), she does not offer any empirical insight into the ways in which universities deal with the problems associated with Prevent. We do not learn how the securitisation of vulnerabilities actually plays out within universities and whether there is any evidence that Prevent has damaged the trust between educators and students. Both Lowe and O'Donnell's critical-theoretical accounts of Prevent highlight the importance of exploring how universities are tackling the challenges associated with legal ambiguities in their delivery of Prevent.

Although Saeed and Johnson (2016) note that universities were 'already working with the police and government personnel to prevent extremist speakers from being given a platform within their universities' (p. 48) prior to 2015, they agree with Gearon that the CTSA 2015 'appears to have drawn universities into the security apparatus of the state', because 'academics and administrators have been compelled to comply with measures aimed at monitoring the activities of mostly Islamic student societies' (p. 37). They offer empirical evidence of Muslim students' 'experiences of a pervasive security narrative existing in universities and across British society' (p. 40). However, their data derives from interviews that were conducted between 2010

and 2012, long before Prevent became a statutory obligation for universities. While their findings suggest that Muslim students already experienced stigmatisation and alienation in universities prior to 2015, they were only able to provide a predictive account of the impact of the legally binding Prevent duty on university life. Their findings reveal that the relationship between Muslim students and Islamic societies with university personnel has been 'shrouded by both distrust and a level of paranoia', which 'has existed well before the 2015 Act that makes it a "statutory" requirement on staff and faculty to inform on "vulnerable" students' (p. 43). On this basis, they forecast that the Prevent duty 'will further reinforce this paranoia, forcing [the] majority of Muslim students to tread with caution, were one misstep can result in scrutiny by the university and security agencies' (p. 44). Although they acknowledge that 'the university can create an atmosphere of security not by becoming part of a security apparatus, but by upholding its freedom and academic expression and thinking' (p. 48), their empirical data seems to confirm their understanding that universities have *already* become agents of security. This predictive account makes it particularly paramount to explore how universities are responding to their legal obligations, especially with regard to their strategies for managing external speakers and their thresholds for reporting dissenting students to law enforcement agencies.

McGovern (2016) offers another predictive account of the 'likely impact of the "Prevent duty" on the life of the contemporary neoliberal university' (p. 49). He is highly critical of Prevent, which he sees as a 'means to institute a bureaucratised technology of surveillance and compliance directed primarily at a "suspect community" of British Muslims, predicated in a rejection of multiculturalism and the promotion of an integrationist agenda' (p. 49). He further argues that the duty's emphasis on 'ideology and the realm of ideas' as well as 'the alleged vulnerability of those at risk of radicalisation' as 'an overwhelming focus of concern' means that 'safeguarding and a duty of care' are 'securitised in the name of counter-radicalisation' (pp. 53, 54). Building on this, he suggests that 'in the Prevent duty, as applied to university students, we are seeing extended to young adulthood an infantilising model of securitised child protection' (p. 54). Although McGovern acknowledges the highly critical voices of university members, he is certain that Prevent 'enmeshes and deepens further a culture of compliance, restricting inquiry and speech in the name of academic freedom and promoting distrust, inequality and alienation in the name of protection and duty of care' (p. 49). While he does not provide any empirically grounded evidence for this prediction, he thinks that universities are unable to 'resist the challenge presented by the Prevent duty' (p. 57). He justifies this interpretation on the grounds of his observation that the structures of contemporary universities, which are determined by 'market oriented, risk-averse managerialism', already promote 'a culture of control and compliance, for students and staff, in what is able to be said and taught and researched' (pp. 49,

59). He therefore expects universities to be particularly responsive towards 'the very form of the Prevent duty, its institutional and bureaucratic ordering, the generation of patterns and rules, procedures, screening and assessment tools, techniques and benchmarks' (p. 58). Since university management 'already embraces notions of oversight, surveillance and disciplines through an increasing emphasis on accountability', McGovern believes that universities lack the 'capacity to resist the challenge presented by the Prevent duty' (p. 57). Notwithstanding the high levels of criticism towards Prevent across the sector, McGovern thus anticipates high degrees of compliance. This prediction of universities' engagement precludes any notion of institutional autonomy among UK universities, and frames universities as a largely homogenous entity. 'The neoliberal university' is an umbrella term used to describe all universities across the country. This significantly oversimplifies the heterogeneity of the English higher education sector, and presumes that universities are implementing Prevent in a similar manner. Whether McGovern's posited culture of compliance shapes all universities' engagement with Prevent to a similar extent remains to be explored in depth.

Like McGovern, Durodie (2016) considers universities' cultures as receptive towards compliance with securitising measures under Prevent, and even argues that 'rather than the securitisation of education that some presume, it may be the therapeutisation of security that we are really observing' (p. 23). He argues that the points that are commonly raised about 'terminology, academic and religious freedom, as well as trust and accountability… missed the wider problem, which is that [the Prevent duty] feed[s] off into a culture that has already assumed and implemented many of the measures proposed, including within educational circles' (p. 25). An emerging so-called 'therapeutic culture', that manifests itself in concepts such as 'safe spaces' and 'trigger warnings', shapes the way education is conceptualised, and furthermore impacts the nature in which 'those working in security related areas engage with universities' (p. 25). In this way, universities are framed as active agents in the shaping of a contemporary security agenda. At the same time, Durodie maintains that although 'the proposed measures' of Prevent 'have been discussed and, in many instances, understood to be both unnecessary and unlikely to work', universities 'will regardless, introduce new procedures and audits *to be seen* to be in compliance' (p. 25). In this way, Durodie's prediction strongly resembles McGovern's. Both of them treat universities as culturally homogenous. In Durodie's view, all universities are guilty of perpetuating a therapeutic culture that renders students as vulnerable and in need of protection, and all universities' responses are shaped by their compliance-driven attitudes.

Thornton (2011) shows that the question of the role of universities in national security became an issue long before they were legally obliged to take part in Prevent. His predictive account of universities' engagement with Prevent is not sparked by the CTSA 2015, but in

recognition of the growing 'interest in preventing "radicalisation" on university campuses' (p. 421) in the early 2010s. In the absence of legislations and statutory guidances, he maintains that 'when it comes to being a counterterrorist security actor, some universities will more readily take on the role than others' and suggests that their engagement will predominantly be defined by a conscious consideration 'of their corporate images', which will divide them into two dominant positions, prioritising either 'national security' or 'academic freedom' (pp. 421–2). A university's decision reflects 'to a large extent… its view of itself, a view fashioned by whatever corporate image it has fashioned in an era of the neoliberal university' (p. 422). In this context, Thornton maintains that 'the commodification of education at universities means they have to adopt positions in line with the values and principles they wish to espouse, and, perhaps more importantly in terms of marketing, the types of students they wish to attract' (p. 422). On the basis of this reasoning, Thornton expects that 'some universities – of the more 'liberal' bent – will want to challenge any and all government interference and reject the fact that they should be seen as security actors', while others 'more inclined to follow government inducements and commensurate with their political image, will accept the "national security" role' (p. 422). Thornton expects that the latter might 'want to present their campus as areas free of any extremist ideas' and will 'clamp down hard on any whiff of radical sentiment' (p. 422). This prediction was made at a time where universities were not legally obliged to comply with the Prevent duty. However, his emphases on the cultural diversity in the university sector, and on the fact that institutions seek to distinguish themselves from each other, are important to take into account when exploring empirically the factors that shape different universities' engagement and compliance with Prevent.

1.2.5. Implementing Prevent in universities: empirical evidence

Empirical evidence of the implementation of Prevent in the university sector is sparse. A majority of the studies concerned with Prevent in the higher education sector focus on academics and Muslim students' perspectives. However, these accounts do not provide any information about how Muslim students' encounters with Prevent are shaped by their own universities' wider response to the duty. For example, Kyriacou *et al.* (2017) conducted an analysis of an online questionnaire submitted by nine British Muslim undergraduate students. Their study suggests that participants had a limited general understanding of Prevent, and perceived the policy as ineffective and inappropriate for the university context. Whether the participants' perspectives are in any way shaped by their universities' wider engagement with Prevent remains unaddressed.

Danvers' (2020) interviews with fifteen academics from four different institutions revealed that they feel less comfortable in teaching and discussing 'critical issues' because of

Prevent. Spiller, Awan and Whiting (2018) conducted interviews with twenty university lecturers from universities across the UK and found that participants struggled to reconcile their Prevent duty with their ambition to uphold intellectual freedom, and that they were showing signs of resistance against their security roles by refusing to report individuals at risk of radicalisation to law enforcement agencies without clear evidence that the latter were engaged in criminal activities. Neither of the two studies addressed whether their participants' perceptions were related to their universities' policy responses to Prevent. In such cases it remains unclear whether experiences of Prevent are informed by the mere existence of the Prevent duty, or by the institutionally specific enactment of Prevent at individual universities.

Guest *et al.*'s (2020) study of Muslim students' experiences of higher education in the UK provides the most comprehensive account to date of their perceptions of Prevent. The study seeks to be particularly responsive to the 'breadth of Higher Education within the UK', acknowledging that institutional diversity 'influences the experiences of Muslim students' (p. 11). Accordingly, the study draws on a national questionnaire survey completed by 2,022 students attending 123 universities across England, Wales, Scotland and Northern Ireland, as well as on interviews and focus groups held with 253 staff and students from four 'very different universities in very different environments' and two Muslim colleges. Interestingly, the study revealed that 'while in general terms Muslims appear more aware of Prevent, this does not translate into a stronger awareness of its presence within the context of their university experience' (p. 43). The findings from the six case study sites showed that 'the variety of geographical and cultural circumstances that different universities find themselves in means that they face varying degrees of institutional proximity to Prevent as a mode of state scrutiny' (p. 43). In particular, the study showed that Prevent 'in many places is embedded in the governing structures of the university – featuring in its student welfare and safeguarding policy documents – but it remains relatively invisible to most students' (p. 43). In contrast, in other universities Prevent 'has triggered political resistance among students and staff in a way that has made its way into teaching and learning and the more general student culture of campus life, including within contexts of student activism' (p. 43). The study highlights that while Prevent manifests itself 'nationwide as a bureaucratic measure', as 'a dimension of student experience of which students are fully conscious, it has a more uneven visibility' (p. 43). While my thesis is not primarily concerned with exploring how universities' different levels and modes of engagement with Prevent shape their Muslim students' experiences, it builds on the work of Guest et al. by showing that the unique institutional cultures of British universities play a significant role in shaping students' encounters with Prevent.

1.2.5.1. Governmental evaluations

A more nuanced account of university governances' engagement with the Prevent duty is offered by official governmental evaluations. In particular, I reviewed four documents, namely the *Implementation of the Prevent duty in the higher education sector in England 2015-16* (published January 2017), the *Evaluation of monitoring of the Prevent duty in higher education in England* (August 2017), the *Monitoring of the Prevent Duty 2016-17 progress report and future development* (July 2018) and the *Prevent monitoring accountability and data returns 2017-18 Evaluation Report* (June 2019). Drawing on an analysis of RHEB's data returns and annual reports, these HEFCE/OfS documents provide their analysis of RHEB's compliance with the objectives of the Prevent duty.

Despite the high level of criticism of the legislation across the higher education sector, the government has found high levels of compliance with the Prevent duty across the sector. Reviews of the second and third monitoring cycles showed that 95 per cent of providers demonstrated due regard in 2017, and 97 per cent in 2018. In turn, the percentage of providers who needed to provide further evidence in order to demonstrate due regard declined from 5 per cent in 2017 to 3 per cent in 2018, and no provider was judged as not complying with the objectives of the duty (Office for Students, 2018a, paras 38–41). The following subsections will review the evidence of universities' implementation of Prevent in accordance with the thematic findings outlined in the governmental evaluations.

1.2.5.1.1. External speaker policies and events

Despite grave concerns related to freedom of speech and academic freedom in relation to the government's guidance on external speaker policies and events, HEFCE in 2016 found that 'providers showed a strong understanding of their responsibilities around freedom of speech'. In that year, 93 per cent of the providers demonstrated that they already had robust processes and policies in place for 'assessing and managing the risk around any speaker or event' (HEFCE, 2017d, para. 10a). Those institutions provided 'clear evidence' that they 'generally understood their responsibilities under the Education (No. 2) Act 1986 to ensure freedom of speech within the law', and that they had 'acted pragmatically to balance these with the requirements of the Prevent duty' through

> consistent systems which enable them to carry out 'due diligence' on external speakers before events are approved, and to identify any risk of unlawful speech which should not

> be allowed to go ahead, or any risks which might need to be managed to allow an event to be proceeded safely (HEFCE, 2017b, para. 30).

These findings were supported by data on speakers and events 'referred to the highest levels of approval required by the provider's procedures'. For example, in the 2016–17 academic year, '271 events and speakers were escalated to the highest levels of approval' (Office for Students, 2018a, para. 57); the most external speakers and events referred to the highest level of approval were in London and the South East, followed by the South West, East, North West, East Midlands, and North East and West Midlands. The OfS explains that 'insight into the regional spread of activity in relation to welfare, events, speakers and training' aims to 'offer some context' (Office for Students, 2018a, para. 46); however, the presentation of external speakers and events data aggregated by region is not accompanied by any explanation or interpretation. The OfS merely states that 'it is helpful to note that some regions have a greater number of smaller providers based on the concentration of autonomous colleges in Cambridge, Oxford and Durham, as well as a higher proportion of small independent providers in London' (Office for Students, 2018a, para. 56) and that the 'data for external speakers and events gives an indication at a broad level that providers are using approvals processes and escalating Prevent-related concerns to the highest level of approval as required' but that the data 'is not indicative of lower-level use of internal policies and processes in considering external speaker and event requests' (Office for Students, 2018a, para. 59). This lack of contextual information and interpretation means that it is impossible to establish whether London and the South East have escalated more external speakers and events to the highest level of approval because of the high concentration of RHEBs and concomitant higher levels of external speaker activity, because of the topics and backgrounds of these speakers and events, because of more rigorous policy enactment in those areas, or due to other, unexplored reasons.

The OfS understands that the provided data supports the conclusion that RHEBs are actively engaging with external speaker and events policies, while they also assure that 'although difficult to quantify exactly', the number of events and speakers escalated to the highest levels of approval 'represents a very small proportion of the total number of events taking place every day across the higher education sector' (Office for Students, 2018a, para. 57). On further examination, the OfS finds that in 2017–18, providers approved 59,574 requests for events and speakers taking place on campus, and that they only rejected 53 of them, which constitutes '0.09 per cent of the total number of requests made' (Office for Students, 2019, paras 17, 18). Although the OfS emphasises that this means that 'providers approved a significant number of requests',

the published data returns also show that 2,153 events and speakers across 65 institutions were only 'approved with conditions or mitigations', which 'may include putting in place experienced chairs to manage and moderate events where needed, ticketing events, or having senior staff present to monitor an event and intervene where necessary' (Office for Students, 2019, para. 43). Moreover, the OfS finds an increase of 16 per cent in the 'numbers of times that an event or request for speaker was referred to the highest decision maker', rising from 271 in 2016–17 to 314 in 2017–18 (Office for Students, 2019, para. 43). Nonetheless, they conclude that they 'currently see no cause, in the information being reported to us, for concern that the sector or individual providers are not balancing their freedom of speech responsibilities with the Prevent duty, or indeed other legislation such as health and safety' (Office for Students, 2019, para. 44).

Whether the presented statistics allow for the conclusion that Prevent does not compromise freedom of speech and academic freedom remains open for debate. For example, the OfS does not provide detailed information about the reasons for which events were reported, mitigated, or denied, and they neither consider reviews pertaining to self-censorship under Prevent nor provide information about whether events where 'rightfully' mitigated or denied. For example, in 2017, the SOAS academic Dr Ruba Salih was invited to chair an event at Cambridge on 'BDS and the Globalised Struggle for Human Rights'; however, following a meeting of the university's Prevent referral group, she was replaced by another 'more neutral' person. Consequently, over 500 people put pressure on the university by condemning its actions in an open letter, resulting in a formal apology in which the University stated that it

> would like to acknowledge that its decision to impose an alternative chair was the wrong response on this occasion, that it evoked strong and understandable concerns... relating to academic freedom... that there was no evidence to support the view that she would not ensure democratic debate, allowing all views to be expressed (University of Cambridge, 2017).

Since the OfS did not establish a category for 'wrongfully mitigated or denied events', one has to assume that this event is considered as one of the 2,153 events under the category 'approved with conditions or mitigations'. A 'no cause for concern' statement therefore requires much more detailed information about the context and nature of the 2,153 conditional and mitigated, and the 53 denied speakers and events. Although the data provided does not allow for a nuanced evaluation of the impact of external speaker policies and regulations under Prevent on academic

freedom and freedom of speech, it does emphasise high levels of action and compliance with the Prevent duty guidance across the sector.

1.2.5.1.2. Staff Training

Following an analysis of the findings from monitoring the first year of the implementation of the Prevent duty, HEFCE found that 'more than 90 per cent of providers demonstrated that they had appropriate plans already in place', with various approaches ranging from a 'tiered approach to training, with different resources used for different groups (such as specific training for senior leaders who have strategic oversight of implementation' to more uniform approaches that 'put all staff through the same basic level of training' (HEFCE, 2017d, para. 55).

However, an analysis of the training data for the first two years designed to 'identify outliers and those with the lowest levels of training' showed 'significant variation between providers, with some training less than 10 per cent of their staff and others training over 80 per cent' (Office for Students, 2018a, para. 67). Drawing on an analysis of the 2017-18 Annual Data Return, the OfS takes 'assurance that staff know how to report concerns were appropriate', but also that a small number of providers indicated 'some confusion around what "broader awareness-raising" means' (Office for Students, 2019, para. 47).

The indication that training remains an area that is subject to lack of clarity and confusion is also reflected in the 2016–17 annual returns, which found that the most prevalent area requiring feedback from the HEFCE/OfS was training, 'which accounted for 30 per cent of the total feedback' and affected 84 providers (HEFCE, 2017b, para. 42). Those findings might be unsurprising given the high level of disagreement and confusion as to what constitutes extremism and radicalisation. However, HEFCE/OfS did not address how and whether institutional reservations towards the government's definition of radicalisation and of non-violent extremism as opposition to fundamental British values have impacted the delivery of awareness training that supposedly provides knowledge about extremist-related vulnerabilities. Furthermore, the OfS does not provide more nuanced information on training activities across the regions. They do find that 'the North East and South East still appear to have undertaken a higher proportion of initial training activity compared with elsewhere in the sector' (Office for Students, 2018a, para. 47), but they do not provide an explanation for this.

1.2.5.1.3. Information technology

Since the first monitoring cycle, one area in which the OfS felt that 'most providers... still had further work to do to meet the requirements of the guidance in full' was IT policies. In 2016, a

third of providers 'still needed to do more to ensure these responded fully to the duty' (HEFCE, 2017d, para. 10). Although 'most providers had longstanding and well-established usage policies and arrangements for security-sensitive access in place', many still had to review their broader policies in light of the statutory duty (HEFCE, 2017c, para. 75). In 2016, HEFCE found that 'over two-thirds of the providers that had yet to make a decision on whether to implement web filtering or monitoring at their initial assessment stage had taken a decision one way or another by the time of their annual report' (HEFCE, 2017a, para. 54).

Despite holding data about the providers' decisions, HEFCE did not include the outcomes in the analysis. They merely emphasised that many providers 'reported that this remained a complex area of the statutory guidance, balancing considerations of IT safety and security with considerations of academic freedom', and that around 30 providers still had to make a final decision regarding their policy (HEFCE, 2017a, para. 54). HEFCE indicated that providers who decided against web filtering 'have put in place alternative arrangements to ensure safety online, such as amending relevant acceptable IT usage policies, and introducing or strengthening processes for managing access to sensitive material' (HEFCE, 2017a, para. 54), but they did not provide insight into the reasons for providers to use or refrain from web filtering under Prevent. The OfS review of activity in 2017 found that 'the majority of providers have now taken a decision on whether to implement web filtering or monitoring' (Office for Students, 2018a, para. 81). However, the report provides no comprehensive overview of the sector's decisions.

1.2.5.1.4. Welfare

Despite the widely held concerns among academics related to identifying vulnerability as a potential source or sign of radicalisation, HEFCE found that already in the first evaluation cycle, 90 per cent of providers 'understand how to recognise and respond to concerns about vulnerable individuals' (HEFCE, 2017d, para. 9d) and that '88 per cent... had clear processes for sharing and escalating concerns about vulnerable individuals internally, and for sharing these where necessary with external multi-agency partnerships' (HEFCE, 2017d, para. 9e). The providers who 'submitted evidence which demonstrated that they were already meeting these requirements' generally 'recognised that safeguarding the welfare of students and staff lay at the heart of the Prevent duty, and cast their responses accordingly' (HEFCE, 2017d, para. 64).

According to HEFCE, the strongest approach to Prevent embeds the duty within existing welfare and safeguarding processes and relies on 'well-established internal mechanisms for dealing with concerns and ensuring appropriate support is offered' (HEFCE, 2017d, para. 64).

The 22 per cent of providers who did not meet the requirements were either slow in developing and implementing policies, did not set out a clear escalation process for sharing and assessing concerns, did not demonstrate suitable processes for external referrals and for accessing further support, or had processes that were judged to be inappropriate and unlikely to lead to concerns being dealt with effectively (HEFCE, 2017d, para. 68).

HEFCE acknowledged that 'some providers expressed concerns about a lack of clarity in the process for making external referrals and information-sharing arrangements' (HEFCE, 2017d, para. 64). At the same time, the subsequent evaluation report emphasised that 'there was significant evidence across providers' annual reports of the effective and ongoing implementation and development for policies and procedures relating to welfare' (HEFCE, 2017a, para. 49), including the integration of Prevent into 'broader welfare, wellbeing and safeguarding policies' (HEFCE, 2017a, para. 49a), unconscious bias training 'to safeguard against the risk of over-zealous reporting of concerns' (HEFCE, 2017a, para. 49b), the identification of faculty and departmental safeguard leads as 'central point of contact and nexus for information-sharing between academic staff and students' (HEFCE, 2017a, para. 49c), and tightened partnership with local faith communities (HEFCE, 2017a, para. 49d). HEFCE did not provide information that would allow for an assessment of whether RHEBs overzealously report perceived student vulnerabilities on a regular basis, but they do indicate that further discussions with a provider were initiated when 'internal welfare referrals looked unusually high for a particular provider given its context' (HEFCE, 2017a, para. 65). HEFCE emphasised again that 'each provider has its own welfare or safeguarding policy tailored to its individual context' and that 'the operation of these policies will be unique to each provider' (HEFCE, 2017a, para. 5).

Despite 'context' being one of the key factors for decision-making, HEFCE does not provide clarification on the contextual factors themselves. In this way, it is impossible to establish which factors actually make high numbers of internal referrals usual or unusual. In 2015–16, 173 cases were escalated to involve the provider's Prevent Lead; in 102 cases, external advice was sought from Prevent partners; and 30 cases were formally referred to Prevent partners as Channel referrals (HEFCE, 2017a, para. 3). Between August 2016 and July 2017, 183 cases of Prevent-related welfare concerns were escalated to institutional Prevent Leads, 122 required external advice from Prevent partners, and 24 referred to the Channel process, which is 'broadly consistent with the previous year' (Office for Students, 2018a, para. 49). In 2017-18, the OfS requested RHEBs to submit data on broader welfare cases beyond those related to Prevent. The data return showed that 83,419 welfare cases were referred for specialist advice and support, 174 of them being Prevent-related welfare cases which were escalated to the point at which the

Prevent Lead became involved. 122 cases then led to external advice being sought from local Prevent multi-agency partners, and 15 cases resulted in formal referrals to Channel. The OfS found that 'these figures do not represent the total number of Prevent-related welfare cases, only those judged sufficiently serious to be escalated to the provider's Prevent Lead' (Office for Students, 2019, para. 38). At the same time, the OfS found that the decrease from 30 in 2015-16 to 24 in 2016-17 to 15 referrals to the Channel programme in 2017-18 'continues to suggest that the number of referrals made by higher education providers makes up an extremely low proportion of Channel referrals overall', where '2,426 Prevent referrals were made by the wider education sector to multi-agency partners in 2017-18' (Office for Students, 2019, para. 40).

However, rather than reading those low numbers of referrals as a sign of the absence of risk, the OfS envisages continuous investigations into the functionality of welfare reporting procedures in the higher education sector. The OfS has acknowledged the sector's concerns regarding its newly established Annual Data Return (ADR) requirements, concerns which were mainly expressed by students and student unions who were worried 'that requests for student welfare data could be perceived as "spying on students"', and which could result in students choosing 'not to engage with student support services' (Office for Students, 2019, para. 29). At the same time, they find that there was 'broad support for our adoption of a risk-based monitoring approach' and 'support for our rationale for requesting welfare data' (Office for Students, 2019, para. 54b).

At the same time, the OfS acknowledged challenges 'particularly around the use of the term "welfare"' (Office for Students, 2019, para. 54e). Despite the wide support for OfS's definitions, some providers 'noted that the term is problematic given that there is no widely accepted definition of what "welfare" means and what constitutes welfare provision' (Office for Students, 2019, para. 54e). Moreover, 'there was a strong interest in, and a call from student service practitioners for, the OfS spelling out in more detail its broader mission and approach to student welfare and safeguarding, and explaining how Prevent relates to it' (Office for Students, 2019, para. 54h). Although the OfS considered using the term 'safeguarding' as opposed to 'welfare', they now find that 'this word is generally used to describe legal protections in relation to children and vulnerable adults' and would therefore 'not necessarily capture Prevent-related activity' (Office for Students, 2019, para. 54e).

1.2.5.1.5. Partnership

In 2017, HEFCE found that '90 per cent of providers also demonstrated that they had partnerships in place with other Prevent-related agencies – although these varied depending on

the size and context of the provider', with larger institutions usually engaging with local authority and Police Prevent teams (HEFCE, 2017d, para. 10b). HEFCE furthermore observed that this engagement occurred through providers 'becoming members of local safeguarding and Prevent groups, linking into partnerships with other HE providers, local authorities, government agencies and police to share information and good practice and promote dialogue across the locality' (HEFCE, 2017d, para. 51b). This includes sharing information pertaining to the provider's risk assessment with local partners such as the safeguarding lead or police, and regular contact with the Regional Coordinators. HEFCE judged that the risk assessments and action plans submitted by all providers 'generally... were appropriate to institutions' circumstances and demonstrated a strong understanding of where risks might occur' (HEFCE, 2017d, para. 10d). However, they also found that 'the overall quality of risk assessment was variable', with strong risk assessments drawing on partnership with and specialist advice from the Regional Coordinators and on a consideration of institution-specific factors (HEFCE, 2017d, para. 51). Others, according to HEFCE 'were too narrowly focused and did not demonstrate understanding of local context or reflect the relative importance of different risks' (HEFCE, 2017d, para. 62). Again, HEFCE did not provide any further information of the contextual and local factors that are expected to shape the risk assessment, and did not elaborate on potential hierarchies of certain contextual and local risk factors. From these documents alone, it remains unclear how universities judge their internal risk assessments and establish risk criteria with regard to the institution's particularities as well as external factors.

The above review of RHEBs approaches to policy implementation suggests that universities seem to have complied nearly universally with Prevent through state-centred practices of policy implementation. Thus, the Prevent policy seems to have constrained the possibilities and probabilities of interpretation and enactment. However, the review also suggests that even within the limitations posed by the legal framework, policies, and statutory guidance, RHEBs employ discretion in their implementation of Prevent.

The main research takeaway from this analysis is that such conclusions can only be preliminary. The government's findings are merely confined to the policy outcomes and do not allow for detailed insight into the processes that inform the various approaches to the implementation of Prevent. This study's focus on policy enactment will seek to provide deeper insight into the negotiations, processes, norms, values, and beliefs that inform the translation of Prevent into institutional policies and regulations.

1.2.5.2. Empirical research on the implementation of Prevent at the institutional level

I was only able to identify three empirical research projects that sought to address the implementation of Prevent at an institutional level. First, Qurashi (2017) provides his personal reflection of the role of academic expertise in the implementation of Prevent at his university; in doing so, he offers an in-depth account of one university's approach to Prevent. Although the university's initial 'position on the Prevent duty was relatively critical', and although the institution deemed that 'much of the early draft guidance was unworkable, lacked understanding, was vague and unnecessary', Qurashi found that 'once the Prevent duty was introduced, the position shifted towards compliance' (p. 201). He interprets the university's focus on compliance on the ground that 'the university was legally bound to implement the Prevent duty, its compliance was being monitored by HEFCE, and ultimately failure to comply could have led to the vice chancellor being held in contempt of court' (p. 201). This case highlights that the prescriptive legal framework of Prevent significantly limited the scope for resistance at Qurashi's university, and in turn, he finds that 'academic expertise had little impact in shaping the implementation of the Prevent duty' (p. 203). Specifically, he argues that the Prevent group's requirement to 'adopt specific positions to create and implement policies and procedures outlined in the Prevent duty guidance document' required 'that academic expertise, knowledge and analysis be side-lined in a number of areas' (p. 203). From a personal perspective, Qurashi found that his 'anti-racism stance did create some small openings for a broader discussion about the impacts of the Prevent strategy', which meant 'that decisions about policy and procedure had to be articulated and defended in relation to their impacts rather than being taken for granted'. However he felt that he 'had little overall impact as an academic expert on the implementation of the Prevent duty' (p. 206). He explains that 'the safest and surest way of achieving compliance was by adopting government talking points, advice and positions', and that 'a state-centric orientation in relation to understanding the nature of the threat' accounted 'for the limited role of academic expertise' (p. 207). Qurashi's account of the state-centric and compliance driven implementation of Prevent at his university corresponds with the predictive accounts of McGovern and Durodie. By adopting a comparative perspective, this thesis will investigate whether different universities' understanding of their legal obligations align with those identified by Qurashi, and play an equally important part in their implementation of Prevent.

Introduced as the 'first study of its kind' (McGlynn and McDaid (2019) collected open source material comprised of Prevent-related policy documents from all 106 English universities, so as to investigate universities' implementation of Prevent. However, their findings rely solely on policy excerpts extracted from a range of different policy areas of around thirty-five

universities, from which McGlynn and McDaid conclude that 'universities have largely abided by their lawful duty' (p. 109). Their policy analysis reveals that 'concerns about surveillance and overt censorship cannot be substantiated' (p. 109). However, it is not clear how they arrived at this conclusion: while their research methodology maintains that 'the documentation… included policy information on aspects of university business such as research governance, guidance on external speakers, information technology protocols and safeguarding policy' (p. 80), they do not provide a single analysis of universities' procedures for managing extremist speakers, and they equally do not address whether any of the universities studied censor and /or monitor extremist material online. Perhaps the most interesting finding deriving from their analysis is that

> the theme of compliance emerges as something that carries two different meanings. Firstly there is compliance in the sense of co-operation with the Duty and a concerted effort to downplay concerns about it. Secondly, there is compliance in the sense of doing nothing beyond what has been mandated in law and guidance (p. 109).

This finding is interesting because it suggests different levels of engagement with the Prevent duty. However, McGlynn and McDaid do not offer any explanation for such divergence in universities' approaches to compliance. Their analysis of some universities' safeguarding documents leads them to conclude that universities have 'uncritically adapted the concepts of vulnerability and radicalisation' (p. 109).

They also offer some more nuanced insight into the enactment of universities' approaches to Prevent on the ground: the second part of their analysis relies on 'focus group studies conducted with UK-based undergraduate students and lecturers based at English universities' to 'explore the everyday experiences of those most affected by the Prevent duty' (p. 111). While the study present insights from eighteen participants, the authors do not provide relevant information about their research design and it is not clear how many participants they interviewed in total and from how many focus groups and institutions. Their participants revealed that 'both students and staff recognise the challenges inherent in dealing with topics such as race, class and gender in the classroom environment' (p. 111). However 'such challenges tend to evolve around etiquette, and are not necessarily indicative of a fear of discussing issues such as radicalisation and terrorism (p. 112). In this regard, their findings 'challeng[e] the notion that the Prevent Duty has, to date, had a chilling effect on academic debate and freedom of speech in universities' (p. 111). This analysis lacks a consideration of how universities' wider policy responses to Prevent shape the experiences of students and academics at their institutions. For example, it may well be the case that universities which (according to McGlynn and McDaid)

focused on the bare minimum of compliance make a particular effort to uphold freedom of expression, while those who place emphasis on co-operation with Prevent may assume a more rigorous approach to controlling controversial issues. On the one hand, the study treats policy statements as representative of universities' engagement of Prevent; on the other, it fails to address the implications of specific policies for university members.

In acknowledgement that 'there is still a lot that is not known about how it [Prevent] has been enacted as well as a dearth of research about the impact it is having', the most recent study on universities' engagement of Prevent draws on '157 responses to Freedom of Information Requests sent to Higher Education Institutions across England, Scotland and Wales' (Whiting *et al.*, 2020, p. 2). The study seeks to 'produce an evidence-informed picture of how the duty has been enacted within UKHE, drawing attention to structures, training and policy as well as referrals made to Channel' (p. 2). Accordingly, it sheds light into similarities and differences in universities' engagement with Prevent. While the authors confirm that most institutions have formed 'either new Prevent committees and working groups' or subsumed the duty 'within existing bodies' (p. 5), they also find that universities' enactment differs strongly with regard to their training approaches. For example, they highlight that 'there was a mixture of training packages and modules offered to staff that covered different issues, struck different tones, spoke to various audiences and had different individuals or groups involved in delivery and design' (p. 6).

Most notably, the study reveals that while most universities consider Prevent as a safeguarding issue, some responses suggest that 'Prevent is being, or has been, primarily understood as a security issue' (p. 10). For example, one London university 'stated that the duty was under the supervision of a "Deterring Terrorist Activities" working group in which meetings were attended by the Director of Student Services, the President of the Students' Union, the Head of Security and a local counter terrorism police officer' (p. 10). In addition, they found that another institution initially classified Prevent as a security issue with the duty being monitored by the 'security working group'; however, it 'had recently been moved into the remit of the well-being agenda' (p. 10). In turn, these approaches strongly differed from 'another institution' which does not have a 'dedicated Prevent structure in place and the duty has been wholly brought within their existing well-being agenda' (p. 10).

In addition, Whiting et al. uncovered that universities referred individuals to Channel for a wide range of different reasons. Institutions referred individuals on the ground that they considered them 'at risk of being radicalised', as 'vulnerable to radicalisation' or in light of 'concerns about vulnerability' raised 'by staff, students and third parties'. In contrast, other referrals were made on the basis of evidence suggesting that 'the individual may have been

radicalised' or in response to specific 'behaviour that these individuals have exhibited'. In this context, universities revealed that 'this took place on campus' or that this included 'threats of violence' especially in light of 'concerns over mental health'. Yet another group of institutions referred individuals to Channel because of 'behaviours exhibited online' (p. 13). Here, Whiting et al. note that 'the duty asks that HEIs have IT usage policies that cover Prevent' and therefore assume that those referrals are the 'result of this enhanced monitoring' (p. 14). Consequently, they conclude that universities' policy enactments 'expand the mechanisms of surveillance and governance' (p. 18).

Whiting et al. provide important insight into the various understandings of universities' roles and responsibilities under Prevent, their different thresholds for reporting individuals to Channel, and highlight different approaches to compliance. However, it is not clear how their empirical data supports several of their claims. For example, it may be the case that universities referred people to Channel because of their online activities, but that universities picked up on individuals' social media activity and behaviours because fellow students or academics reported concerns, and not because the university actively monitors individuals' internet usage. To sustain the argument that universities' enactment of Prevent has led to increased surveillance, Whiting et al. would have to provide an analysis of universities' actual approaches to monitoring online behaviour under the duty.

Whiting et al. also note that universities have introduced or amended their external speaker, research, IT and safeguarding policies in light of the duty. They conclude that these policy amendments 'hardwire the duty into the bureaucratic fabric of the institution, inculcating a conservative approach that makes use of the institutional apparatus and its accepted legitimacy to ensure compliance' (p. 12). It is again unclear how far their findings support the interpretation of a 'conservative approach'. For example, acknowledging the Prevent duty as part of universities' IT policies without introducing new mechanisms to monitor and block access to extremist material can hardly be interpreted as a 'conservative approach'. A more nuanced reading of the policies would be needed to arrive at this conclusion.

Finally, Whiting et al. suggest that 'divergence in how the duty is being framed across the sector speaks of its ambiguity and that HEIs may still be unsure about how to meet their obligations' (p. 10). Yet again, one would wish for a stronger link between empirical data and such a general interpretation. Universities may not be unsure at all: they could just have different understandings of their legal and moral obligations. A university may be confident that integrating Prevent as part of their security structures is the most appropriate approach in their context, while another university may be equally confident that their welfare structures are best

suited to accommodate Prevent. Although Whiting et al. provide important evidence for the divergence of policy enactment, they fail to address the factors that shape such diversity.

1.3. Conclusion

This chapter has found that universities have been subjected to a securitising move under Prevent (see 1.2.2), and that university members' rejection of the security dimension of Prevent is well documented. In the same spirit, scholarship on the impact of Prevent on university is critical and highlights the problems associated with the ill-founded definition of extremism as 'vocal opposition to fundamental British values', with the securitisation of vulnerabilities, the stigmatisation of Muslim students, and with Prevent's potential impact on academic freedom and freedom of speech.

However, empirical research on universities' actual engagement with Prevent remains sparse. Academic interpretations of universities' responses to Prevent are largely theoretical-predictive, lacking robust empirical evidence. In addition, the existing studies either ignore or only address in passing the institutional diversity of UK universities as a potential factor that shapes their engagement with Prevent. The most comprehensive evaluation of universities' compliance with Prevent is provided by the government, but they fail to offer sufficient information to learn more about the factors that shape universities' policy responses. While they highlight that engagement with Prevent varies across institutions, they do not offer explanations for such variations. They also fail to provide an overview of universities' approaches to monitoring and blocking and remain silent about the factors that inform universities' risk assessments. In turn, the empirical data about universities' engagement with Prevent to date does not allow for a nuanced analysis of the extent to which universities have become securitised, or in the words of Gearon have moved 'out of the sphere of… what are perceived to be normal university politics' (Gearon, 2017, p. 4).

In order to address the empirical shortcomings in the aforementioned research, I designed my study to provide a systematic comparison of the policy enactment of Prevent. A combination of an in-depth document analysis and interviews with Prevent Committee members and RCs, allowed me to explore the factors that account for divergence of policy enactment and to investigate how such policies are enacted on the ground. In turn, the empirical data collected permits a nuanced evaluation of the extent to which universities have engaged in securitising practices under Prevent.

2. THEORETICAL FRAMEWORK AND RESEARCH DESIGN

Chapter overview

This thesis has two connected aims: (1) to investigate how universities have implemented Prevent on a policy level and in practice; and (2) to ascertain whether their enactment of Prevent has rendered them 'securitised'. §2.1 establishes the theoretical framework for the thesis, which is designed to measure instances of securitisation through an investigation of the policy-enactment process. I have incorporated the theoretical framework into a wider discussion of methodology, because the former has guided my approach to data collection and analysis. Accordingly, the chapter discusses the research design, data collection and analysis, and ethical considerations that underpin the thesis as a whole.

2.1. EVALUATING THE 'SECURITISATION' OF EDUCATION UNDER PREVENT

Traditional scholarship on securitisation, most prominently developed by the Copenhagen School [CS], understands securitisation as 'a process by which a "securitizing actor", through speech acts that employ the rhetoric of existential threats, transforms a seemingly non-security issue into an urgent security concern' (Wæver, 1989; 1995). However, the securitising move itself does not constitute a successful case of securitisation: whether an entity becomes a security concern or not depends on the interaction between securitising actors and their audience (Wæver, 1995, 1989). Second-generation scholarship is built on the notion that securitisation is an 'intersubjective process' (Buzan, Wæver and De Wilde, 1998, p. 30) because 'security threats are produced through a social process of constructing shared understandings regarding their existence and character within a group' (Côté, 2016, p. 542). An increasing emphasis on this intersubjective process resulted in a stronger theoretical focus on the context in which the securitisation process occurs, and on the audience that is targeted by the securitising agents. Most notably, Buzan et al. (1998); Balzacq (2005); Stritzel (2014); and Léonard and Ruzicka (2016) emphasise that 'audience acceptance' is essential for the success of securitising moves and hence the whole process of securitization. This is supported by Côté (2016), who finds that 'audiences actively participate in the intersubjective construction of security meaning' (p. 564).

The way in which the audience responds to a securitising move therefore has strong influence on its success. In some cases, the audience acts in a way that goes 'well beyond the original intentions of securitizing actors, thus intensifying the urgency and extremity of securitization' (Côté, 2016, p. 547). Correspondingly, the audience rejection of the securitising

move can lead to significant changes in the whole securitising move and securitising measures, or to the termination of the securitising efforts altogether. Following on from this, Côté (2016) argues that 'acceptance of a securitizing move is, itself, a security action' (p. 544). Floyd (2015) adds that 'the securitizing move is the speech act only, and by itself does not constitute securitization; an issue is securitized only at the point when a relevant audience accepts the existential threat identification' (p. 680).

Despite this recognition of the central function of the audience in the process of securitisation, efforts to provide comprehensive conceptual frameworks to better explain the relationship between subject and audience in the securitisation process are currently lacking. For Floyd (2016) the 'securitizing actor' is 'the one who acts on the threat, is in a position of power to instruct others to act', while the 'audience is the addressee of the speech act', the 'reference object' of the protection promised by the securitiser. In line with this definition, she finds that 'there simply is no conclusive relationship between audience acceptance and the "success" of securitization' (p. 691). For example, citing McMahan (2005), she notes that 'there was no evidence that ordinary Iraqis wanted to be freed from the Ba'athist dictatorship by the United States' (p. 690). In this way, she makes clear that her definition of audience acceptance does not attribute any agency to the audience. In contrast, Côté's understanding of audience focuses on their '*capacity* to authorise the view of the issue presented by the securitizing actor and legitimize the treatment of the issue through security practice' (Côté, 2016, p. 548– my emphasis). According to his definition, 'ordinary Iraqis' would not be the audience of the securitising move, because they did not have the agency he postulates as the defining criteria for this category.

In response to what she perceived as the 'absence of a comprehensive treatment' of what 'renders securitization "successful"', Floyd developed a novel revision of the CS securitisation theory. Her conditions state that

> securitization is 'successful' only when (1) the identification of a threat that justifies a response (securitizing move) is followed by (2) a change of behaviour (action) by a relevant agent (that is, the securitizing actor or someone instructed by the same) and also (3) the action taken is justified by the securitizing actor with reference to the threat they identified and declared in the securitizing move (Floyd, 2015, p. 684).

Her framework rejects the importance of exceptionalism as a defining condition of securitisation, mainly because it 'cannot adequately account for how security plays out empirically' (p. 692). Floyd finds that 'securitizing actors regularly securitize issues that are not existentially threatening' (p. 691). For example, citing Goldstone (1996), she draws on the example of the

US, which not only securitised entities that posed threats to its survival, but also issues that threatened 'to drastically reduce the welfare of the nation'. Consequently, she maintains that 'what matters for the "success" of securitization is not whether or not threats are existential, and conversely that the security response is extraordinary', but rather that practitioners believe that an issue poses 'a threat to their security (however defined), and regard what they do in response to the threat they themselves identified' to be an 'implemented security policy' (Floyd, 2015, p.691).

Floyd's emphasis on 'action and behaviour as opposed to simply security language' is necessary because 'there is an important distinction to be made between behaviour on the one hand and language on the other' (Floyd, 2015, p. 685). In her view, securitisation is unsuccessful unless accepted speech acts translate into corresponding measures. Floyd's framework requires securitisation scholars to look 'at what practitioners of security do when they securitize' by 'tracing the process of securitization in three steps'. First, scholars ought to locate the securitising move or speech act (which is not limited to existential threats); second, examine 'the extent and nature of the action or behavioural change following from the speech act'; and third, using discourse analysis, 'locate the justification for the measures taken to address the threat' (Floyd, 2015, p. 688). In this way, securitisation is only considered successful when the audience adopts activities that enable the process of securitisation. Through their actions, they either assume securitising roles on behalf of the state, or reject the securitising move.

The data analysis in this thesis will follow a modified version of these three steps. §1.2.2 already explored some of the reasons for which universities have been subjected to the Prevent duty. Drawing on interviews with governmental officials (RCs) involved in assisting universities in complying with Prevent, I will explore in detail the major rhetorical strategies employed by securitising agents in direct interaction with their enabling audience. Subsequently, I will examine the 'extent and nature of the action or behavioural change following the speech act'. This step deviates somewhat from Floyd's conceptual framework, because it focuses on the behavioural change of Côté's enabling audience and not on the behavioural change of the securitisers. In this way, I combine Côté's understanding of the function and importance of the enabling audience with Floyd's approach to evaluating successful cases of securitisation.

2.1.1. Combining securitisation theory with the concept of policy enactment and street level bureaucracy

I will assess the extent and nature of behavioural change in two ways. A document analysis of universities' Prevent risk assessments and action plans, and their safeguarding, external speakers

and free speech, and IT policies and regulations will examine how universities have integrated Prevent on a policy level. Here, I draw on Ball's theory of policy enactment, which suggests that education policies are interpreted and translated by diverse policy actors as they engage in making meaning of official texts for specific contexts and practices (Ball, Maguire and Braun, 2012). The policy actors within those discursive communities regulate which aspects of policy texts are privileged and/or 'filtered out' and subsequently translate, or 'recode' policy. This means that the translation of policy is a 'political-institutional process' that involves an engagement with the languages of policies, leading to 'an iterative process of making texts and putting those text into action, literally 'enacting' policy, using tactics, talk, meetings, plans, events… and being supported by local authority advisers' (Ball *et al.*, 2011, p. 620).

In this way, Ball's policy actors and Côté's enabling audience assume the same roles in the process of policy interpretation and translation, or decoding or recoding. Here, 'official policy texts move from sites of legislative formulation to contexts of enactment' (Singh, Thomas and Harris, 2013, p. 466). The enabling audience responds to the securitising move of the state, not merely rhetorically, but through policy enactment, and thus accepts or rejects the securitising move.

In addition to the document analysis, I draw on data deriving from interviews with Prevent Committee members. This is methodologically significant, for two reasons. First, I assume that policy documents cannot provide sufficient information to allow for an examination of the full extent of behavioural changes. Scholars concerned with policy implementation have found that 'policies do not succeed or fail on their own merits; rather their progress is dependent upon the process of implementation' (Hudson, Hunter and Peckham, 2019). Gunn (1978) terms this phenomenon the 'policy implementation gap'. One way of making sense of this gap is through Lipsky's concept of so-called 'street-level bureaucracies'. He argues that the exercise of discretion is a critical dimension for the way in which public servants deliver public policies on the ground. The concept of 'street-level bureaucracy' hints at the paradox of policy implementation: While '"Bureaucracy" implies a set of rules and structures of authority; "street-level" implies a distance from the centre where authority presumably resides' (Lipsky, 1980, p. XII). Lipsky argues that 'the decisions of street-level bureaucrats, the routines they establish, and the devices they invent to cope with uncertainties and work pressures, effectively *become* the public policies they carry out'. In this way 'public policy is not best understood as made in legislatures or top-floor suites of high-ranking administrators', but rather in the 'daily encounters of street-level workers' (Lipsky, 1980 p. XII). In turn, Côté's 'audience of securitisation' does not only enact upon governmental policies by translating the Prevent duty into their universities' rules

and regulations, they also become 'street-level bureaucrats' who deliver the duty on the ground. My analysis of interviews with Prevent committee members aims to capture their behavioural changes not only on a policy level but also through their 'street-level' implementation of the Prevent Duty.

The conceptual understanding of university Prevent committee members as 'street-level bureaucrats' and as the 'enabling audience' resonates with the government's emphasis on universities' discretion in the delivery of Prevent (see §1.2.1). Although the OfS does not clarify the extent to which universities are effectively autonomous in their decision making, the guideline provisions suggest that within the boundaries of legal compliance, there is a notable discretionary space in relation to the implementation of Prevent, and that some elements of the statutory guidance are merely non-binding recommendations. Despite an increased focus on the audience in the process of securitisation, the CS securitisation theory is still criticised for its elitism and top-down framework. For example, Baysal (2020) argues that a continuous emphasis on 'securitization as a top-down, linear process' neglects 'the bottom-up characteristics of the process' (p. 9). In contrast to standard conceptualisations, he finds that 'a securitization process has both top-down and bottom-up characteristics, and in a securitization analysis, all of these characteristics should be taken into consideration' (p. 9). In addition, he points to the currently under-acknowledged conflict between the different, sometimes contradictory truth claims through which securitisation is constructed and highlights the importance of 'examin[ing] rival voices in the securitization process', as they may initiate a 'counter-securitization against the state' (p. 10). Despite the shortcomings associated with the traditional top-down understanding of securitisation, empirical research that explores bottom-up dynamics is virtually absent from securitisation scholarship. In contrast, socio-legal scholarship that focuses on policy implementation analysis and on 'street level bureaucrats' clearly establishes the limitations of hierarchical top-down implementation of laws and public policies. Such scholarship could yield important implications for both the empirical study and theoretical conceptualisation of cases of securitisation. For example, Maynard-Moody and Musheno (2003) find that teachers, councillors and police officers 'first make normative judgements about offenders, kids, and clients and then apply, bend, or ignore rules and procedures to support the moral reasoning' (p. 155). This observation highlights the limitations of contemporary approaches to the study of securitisation, which do not adequately address what actually happens once the extraordinary measures are manifested in laws and regulations. Given that the success of a securitising move hinges on the acceptance and implementation of front-line workers who are required to enact the extraordinary measures introduced to counter-act the perceived threat, studies on the 'street-level' enactment

of laws and policies are of paramount importance for evaluations of the success of a securitising move.

Recognising the importance of empirical research showing that 'street-level bureaucrats' own perceptions of law and justice play a significant role in administrative decision-making', Hertogh (2010) argues that 'if we want to understand the social significance of law, we should not only focus on the law in the books, but also on the way that people experience law' (p. 5). Based on his study on the legal consciousness of front-line officials charged with the responsibility of restoring a 'sense of community and security' in a disadvantaged and crime prone neighbourhood in the Netherlands, Hertogh concludes that 'administrative justice "in the books" does not always equal administrative justice "in action"' (p. 33). In particular, he challenges the dominant perception that 'street-level workers are "state agents"' (p. 17). Despite the widespread understanding of street-level workers as 'government employees who are charged with carrying out the plans and policies of government agencies', he confirms Maynard-Moody and Musheno's hypothesis that although front-line workers' decisions and judgements 'exist in the context of rules, procedures, and agencies', the enactment of policies and regulations are 'case specific and are guided by normative, rather than legal, ordering' (Maynard-Moody and Musheno, 2000, p. 374 as cited in Hertogh, 2010 p. 17). In light of such findings, one of the major limitations posed by contemporary theories of securitisation rests in the failure to address the gap between the passing of laws and regulations that introduce extraordinary measures in response to a perceived threat, and the actual enactment of such laws by front-line officials on the ground.

This study seeks to close this empirical and theoretical gap in securitisation scholarship by paying particular attention to the discretion and rationales of the 'enabling audience', which I define as the 'street-level bureaucrats' who are charged with the enactment of the Prevent duty. To that end, the study provides the first ever evaluation of the mechanisms of securitisation in the university sector that moves from the analysis of the development of legislations and regulations to an evaluation of the actual enactment of securitised measures.

Accordingly, this study explores the ways in which members of university Prevent Committees engage with the objectives of the Prevent duty through the decoding and recoding of the mechanisms of the government's policy documents and guidelines, as well as of their own documents, in order to implement Prevent on the ground. This approach is in line with Floyd's framework for evaluating the success of securitisation, since I do not merely consider whether members of Prevent Committees agree with the threat perception of the government, but also whether this has led to a change of behaviour. Only such a change would provide evidence for audience acceptance.

2.1.2. Defining securitising actions and justifications in higher education

Universities have arguably assumed functions as agents of the state before complying with their Prevent duty obligations. Their staff and academics have long been involved in managing 'threats' to society, for example by assuming central functions in 'the formation of the modern intelligence agencies themselves' (Davies, 2002, 2010; De Graaf, Nyce and Locke, 2018, as cited in Gearon, 2019, p. 2). Gearon highlights that 'security and intelligence agency concerns with universities range from the commissioning of security-sensitive research' to 'the ongoing recruitment of staff and students for covert security and intelligence work' and argues that 'current-day counterterrorism on campus agendas are, then, only an intensified aspect of an historical but ongoing and likely future interface between universities and security and intelligence agencies' (Gearon, 2019, p. 2).

However, the nature of Prevent differs significantly from any security practices that university members have previously been asked to perform. The requirement to move from voluntary and research-centred contributions made by individuals (i.e. not as representatives of their universities) to a sector-wide requirement to target, identify and prevent potential future crime can be considered as a novel and 'exceptional' measure to address the existential threat associated with radicalisation. Consequently, one criteria of the securitisation of education under Prevent is that the measures of universities are executed systematically on behalf of the state, and in doing so go beyond their ordinary, and mainly voluntary, safeguarding functions.

While Prevent is commonly framed as a safeguarding measure, there are significant differences between traditional welfare safeguarding and novel securitised safeguarding measures. As opposed to securitised practices, traditional areas of welfare-oriented safeguarding are aimed at the prevention of abuse, and as such are 'generally divorced from political ideology' (McKendrick and Finch, 2017, p. 7). In the traditional welfare safeguarding area, 'children and young people are generally viewed as victims' and the 'focus on welfare is viewed as good in its own right'. In contrast, within securitised forms of safeguarding, 'concerns about the risk of possible crime in the future' are 'deemed as potential threats to the very fabric of society'. In turn, 'those involved in alleged extremism or being at risk of being radicalised are clearly viewed not within a victim discourse, but, rather, as "potential criminals" and a very real threat to the public' (McKendrick and Finch, 2017, p. 7). Drawing on this conceptual distinction between welfare-oriented safeguarding and securitised safeguarding, I define the process of securitisation in education as a situation where universities are acting on behalf of the state in carrying out activities for the primary purpose of identifying and reporting individuals and groups that are

perceived as an existential threat to society. This means that changes of behaviour in response to Prevent meet the threshold of securitising activities if they go beyond the scope of universities' traditional safeguarding measures, and are exclusively applied to radicalisation issues, and not to wider wellbeing concerns. The integration of Prevent into existing safeguarding and wellbeing structures which treat radicalisation concerns as similar to concerns about other wellbeing, safeguarding, and mental health issues therefore cannot be considered as securitised activities.

2.2. Epistemological Paradigm

The present study is located within a constructivist epistemological paradigm, where reality is viewed as subjective, based on the meanings and understandings that are attributed to the phenomenon under study. The ontological position of constructivism stresses the 'active role of individuals in the construction of social reality' (Bryman, 2012, p. 84). This understanding lies in the heart of CS securitisation theory, as well as Ball's theory of policy enactment and Lipsky's focus on the street-level bureaucrat. As Balzacq, Léonard and Ruzicka (2016) note, 'securitization theory has a close affinity with social constructivism, in particular within the works that examine the role of language, the status of practice and the power of argument in world politics' (p. 496). This corresponds with the epistemological underpinnings of Ball's theory of policy enactment, that treats policies as a reflection of discursive and fundamentally social processes. Both frameworks reject the notion of one objective truth: security is the outcome of a negotiated labelling process and corresponding enactment, which is co-constructed by security agents and the enabling audience.

Similar to processes of securitisation, education policies do not reflect objective or rational policy problems and solutions, but are understood as discourse strategies that are used to construct educational purposes (Ball, 1993). Both securitisation and education policy discourses rely on tools of persuasion that serve the goal of rendering some truth regimes or constructions of reality more appealing or legitimate than others.

2.3. Case Study Research

I designed a qualitative case study to explore how seventeen English universities engage with their responsibilities under Prevent. According to (Creswell, 2014), the qualitative case study design is particularly well suited for in-depth, exploratory research inquiries. Schramm (1971, cited in Yin, 1989, p. 23) emphasises that 'the essence of a case study, the central tendency among all types of case studies, is that it tries to illuminate a decision or set of decisions: why they were

taken, how they were implemented, and with what result'. Yin (1989) adds that case studies are used to 'understand a real-life phenomenon in depth' and 'within its real-life context', especially when 'such understanding encompasses important contextual conditions' which are 'highly pertinent' to the phenomenon of study. The present study is designed to explore the implementation of the Prevent Duty within seventeen universities in England. At a larger level, my thesis explores a case of the implementation of Prevent. Specifically, the study comprises a multi-case, comparative analysis in which the manifestation of Prevent at each university is treated as an individual case in its own right. The units of analysis across all seventeen cases are the same, namely the university policy areas in which Prevent is being enacted. In contrast, the context of each of the cases differs across universities: I selected the seventeen universities with particular regard to their contextual conditions (Creswell, 2018) in order to explore further the factors that shape their engagement with Prevent. In particular, the cases were not selected with the aim of replicating results, but rather in order to examine possible variations and differences in their engagement with, and enactment of, Prevent.

The stratified nature of UK higher education institutions is well documented by many scholars, who have highlighted that the difference between universities' statuses is connected to their age, with 'Old' universities being held in higher esteem than newer institutions (Scott, 1995; Tight, 1996; Halsley, 2000; Archer Hutchings and Ross, 2003; Brown, 2013). Boliver, (2015) notes that the differentiation of 'Old' and 'New' universities has changed over time. Initially, only Oxford and Cambridge were known as 'Old' universities (among English institutions). However, the 'red brick' universities, founded in the late 1800s and early 1900s, and the 'civic' universities, established in the mid-1900s, also became known as 'Old' universities alongside Oxford and Cambridge, in order to demarcate them from the '*new* New universities created as a result of the dismantling of the binary divide between universities and polytechnics in 1992' (p. 611).

Based on a cluster analysis that examines dimensions of status differentiation related to research activity, teaching quality, economic resources, academic selectivity, and socioeconomic student mix, Boliver (2015) finds that 127 UK institutions can be divided into four different status clusters. Her analysis concludes that the first cluster consists only of Oxford and Cambridge, the second cluster includes the remaining 22 Russell Group Universities and 17 additional 'Old' universities, the third cluster comprises 13 'Old' universities and 54 'New' universities, and the fourth cluster – the bottom tier – is made up of the remaining 19 'New' universities. Boliver highlights that when compared to cluster 3, 'cluster 2 universities receive more than three and a half times as much research income, have 50% more postgraduate students', received excellent scores in the Research Assessment Exercise (RAE), and scored

'higher than cluster 3 universities on student satisfaction with teaching' (p. 622). She also notes that 'cluster 2 universities receive more than six times as much income from endowment and investment resources' than cluster 3 universities, 'have significantly more favourable student-staff ratios', 'admit students with considerably higher UCAS point scores', and 'serve an appreciably more socioeconomically advantaged student body' (p. 622). Moreover, she finds a 'significant divide' between cluster 3 and cluster 4 universities: cluster 4 institutions have 'less than a third as much research income, have significantly lower RAE scores… [have] markedly less favourable student-staff ratios… admit students with UCAS point scores that are much lower on average', and 'admit a less socioeconomically advantaged student body with respect to low participation neighbourhood, social class and school type' (p. 623).

This study will build on these conclusions, and consider the contextual differences between universities as a potentially very important factor for explaining the ways in which they engage with Prevent. This initial hypothesis is also informed by the OfS' expectation that universities will implement the duty differently and with regard to their unique institutional context (see §1.2.1).

2.3.1. Sampling and recruitment

My sampling strategy relied on a review of the public-facing webpages of 106 English universities. I collected and familiarised myself with over 400 documents related to universities' approaches to implementing Prevent. In addition, I reviewed universities' responses to Freedom of Information Requests issued by the Open Rights Group: a non-profit organisation that aims to preserve digital rights and freedoms by campaigning on issues such as mass surveillance, internet content filtering, and online censorship.

The first phase of the research focused on gaining an initial overview of potential similarities and differences in the policy enactment of Prevent across the English university sector. Moreover, the public-facing websites enabled me to collect the email addresses of prospective interviewees. I grouped universities in line with Boliver's clusters of higher education. I also grouped them by location, so as to include universities from all over the country. I selected universities located in London (4), the South East (4), the East Midlands (1), the West Midlands (1), Yorkshire and the Humber (2), the North East (1), the North West (2) and the South West (2). Moreover, the seventeen universities represent Boliver's status clusters to account for the institutional diversity of English universities. In my description of the cases, I amalgamated status clusters 1 and 2, because otherwise it would become immediately apparent whether I had included Oxbridge institutions, which might in turn lead to the (possibly wrong) identification of universities.

I excluded 34 universities which at the time of the case selection process (in 2017/18) did not provide the contact details of staff members who were involved in the delivery of Prevent. I also made initial judgements about the information universities provided as part of their statements and policy documents when I perceived that information to be particularly revealing about an institution's attitude to Prevent. I planned to recruit my participants in several phases, with the goal of recruiting at least fifteen participants from fifteen universities. I decided to aim for a minimum of fifteen cases, not in order to achieve statistical representativeness but to be able to account for institutional diversity. The samples had to account for Boliver's clusters, eight geographic locations, different sizes, and include institutions located in the heart and outside of city centres. From this, I judged that a selection of at least fifteen cases would be necessary to satisfy this diversity.

After two recruitment rounds, where I contacted over sixty participants from fifty universities, twenty-eight participants from seventeen universities agreed to participate. Simultaneously, I identified the email addresses of the eight Regional Higher Education Prevent Coordinators (hencefort referred to as RCs), and invited them to participate in the study. I invited the RCs because of their key role in providing universities with support and advice around the delivery of Prevent. This allowed me to explore the RCs' rhetorical strategies for achieving compliance across the sector. Moreover, I expected them to have extensive insight into universities' policy responses, attitudes, and justifications for their actions under Prevent. Although initially only one of them agreed to participate, two others eventually agreed after my participants contacted them again on my behalf and asked them to participate in the study. The three RCs are referred to as RC1, RC2, and RC3.

I also contacted the OfS and requested their help in identifying staff members charged with monitoring compliance with Prevent, and asked for access to some of the annual returns that universities have provided to comply with the duty. However, none of the members of the OfS responded to my queries.

Table 2.3.1 (see Appendix A) provides an excerpt of my case site selection and recruitment process, which in its original form included all seventy-two universities which provided their contact details.

2.3.2. Case descriptions

One of the major ethical considerations of this study relates to maintaining the anonymity of my participants and their institutions. In order to mitigate any potential damage to universities' reputation, I had to assure my participants that I would present my data in a way that makes it

impossible, or at least prohibitively difficult, to identify the institutions on the basis of my case descriptions. This left me with the problem that the study had to strike a balance between providing necessary contextual information and preserving the anonymity of the institutions. (§1.5 engages with the ethical consideration of this research project in more depth.)

The following table provides an overview of the selected universities, and the characteristics I was able to disclose whilst maintaining their anonymity.

Table 2.3.2. Case and context descriptions

University	Foundation	Mission Group	Other characteristics	Status cluster
A	Pre-1992	Russell Group	Large suburban	2
B	Pre-1992	Russell Group	Small urban	2
C	Pre-1992	Russell Group	Medium size suburban	2
D	Pre-1992	Russell Group	Large urban	2
E	Pre-1992	Russell Group	Large urban	2
F	Pre-1992	Russell Group	Urban, University E's satellite campus	2
G	Pre-1992	Russell Group	Large urban	2
H	Pre-1992	Russell Group	Medium size urban	2
I	Pre-1992	Russell Group	Large urban	2
J	1992	[redacted]	Urban satellite campus	3
K	Pre-1992	Russell Group	Large institution, non-urban	2
L	2010s	[redacted]	Small institution, non-urban	3
M	Pre-1992	Russell Group	Large urban	2
N	1992	[redacted]	Medium size suburban	3
O	2002	[redacted]	Small urban	4
P	2010s	[redacted]	Small suburban	4
Q	1992	[redacted]	Medium size urban	3

2.3.3. Participant description

The interpretivist objective in qualitative research demands that units of research are selected deliberately to reflect particular features and characteristics of the sampled population (Mason, 2002; Patton, 2002). The sample in this context was not intended to be statistically representative, but is well suited for in-depth explorations (Patton, 1999; Ritchie and Lewis,

2003). Prior to the fieldwork, I talked to one member of the OfS off-the-record. University participants were selected based on their involvement with Prevent at their universities, which meant that they had specialist knowledge about one or more policy areas relevant to Prevent. All of them assumed an active role on their universities' Prevent committees, which meant that they were all sufficiently knowledgeable about the relevant policy areas. Several participants were particularly knowledgeable/interested in specific policy areas and/or compliance issues, which is noted in the list below.

Once again, my main consideration in relation to the participant description was to maintain the anonymity of my participants while providing as much contextual information as possible about my sample. In three cases I censored the specific occupation of my participants on their request in order to assure them that they would not be personally identified in the (unlikely) case that their university was identified. In other cases, the title of my participants' positions were so specific to their institution that I used an equivalent but more generic title to describe their position.

Table 2.3.3. Participant description

Participant (P.) Name	**Position as member of their university's prevent committee**	**Outstanding expertise beyond their extensive knowledge of the university's wider approach to prevent**
P.A	Prevent committee member, senior university governance	Legal expert, referrals
P.B1	Prevent Lead	Referrals
P.B2	Chaplain	Welfare
P.B3	IT specialist	Blocking and monitoring
P.C	Director of Wellbeing	Referrals
P.D	Director of Compliance	Referrals, Risk assessment, External partnerships
P.E	Student services	Welfare
P.F	Student services	Welfare
P.G1	Prevent officer	Compliance, Risk assessment
P.G2	Policy officer	Training
P.G3	Academic	Legal expert
P.H	Student services	Welfare
P.I	Registrar	Compliance
P.J	Registrar	External partnerships
P.K	Student services	Welfare
P.L	[redacted]	[redacted]
P.M	Director Health and Safety	Compliance,
P.N1	Academic registrar and student services	Welfare, referrals
P.N2	Head of Information Security	Blocking and monitoring
O	[redacted]	[redacted]
P	Student services	Welfare

Q	[redacted]	[redacted]
RC1	Regional Coordinator	Partnership, risk assessment
RC2	Regional Coordinator	Partnership, risk assessment
RC3	Regional Coordinator	Partnership, risk assessment

2.4. Research Methods

2.4.1. Document analysis

The case study method 'relies on multiple sources of evidence with data needing to converge in a triangular fashion' and 'benefits from the prior development of theoretical propositions to guide data collection and analysis' (Yin, 2009, p. 18). My first data source is universities' policy documentations of their engagement with the Prevent duty. I reviewed the selected universities' public-facing websites and downloaded and took screenshots of every document, policy statement, committee minute and training material that relates to the Prevent duty. In addition, I requested further documentation from my research participants in cases where universities did not make all elements of their approach to Prevent publicly available. Overall, I analysed over seventy policy documents. Table 2.4.1 (see Appendix A) provides an overview of the range of documents I examined.

In accordance with the analytical process described by (Bowen, 2009) the selected documents were examined, coded and categorised, and themes were uncovered.

In particular, I employed a comparative approach through which I tried to establish similarities and differences across the documents of all seventeen institutions. The adoption of a comparative perspective meant that similar document groups of different universities were repeatedly read, categorised, and explored with a view to identifying similarities and differences. Through the iterative reviewing and comparison of the documents, the data was coded, and main codes and themes were identified. Table 6.1.3 (see Appendix B) provides an example of this process.

2.4.2. Expert interviews

The suitable interview technique identified for the purpose of this study is the expert interview. As pointed out by Bogner and Menz (2009), expert interviews belong to the paradigm of interpretative social research (p. 46), which is the 'result of their [the experts'] specific interpretative knowledge ("know why") and procedural knowledge ("know how")' (Littig, 2009, p. 99). The definition of 'expert' I adopt is that of Gläser and Laudel (2009): 'people who possess special knowledge of a social phenomenon which the interviewer is interested in', and expert

interviews as 'a specific method for collecting data about this social phenomenon' (p. 117). An emphasis on expert interviews as a data collection method reflects my aim to attain in-depth insight into the dominant narratives that are constructed around compliance with Prevent, and the ways in which universities' forms of engagement are rationalised.

Meuser and Nagel (2009) argue that 'the expert interview is not likely to be conceptualised as a process of extracting knowledge from the interviewee by asking questions in the sense of a questionnaire' (p. 32). For this reason, the 'open interview based on a topic guide' is considered to be 'appropriate for data collection', because it allows experts to rely on multiple forms of exploration which eventually reveal 'more about relevances and maxims connected with their position and functions' (p. 32).

In line with this approach, I constructed interviews around topics, rather than adopting a more structured questionnaire. At the same time, the topic guide was informed by the categories and topics identified during the document analysis, and structured in a way that allowed for a certain level of consistency regarding the topics of investigation. In turn, this facilitated a comparative analysis of the constructions of narratives that pertain to decision-making processes and universities' enactment of Prevent. The questions articulated as guidelines for the interviews were open-ended, and therefore allowed experts to talk freely 'about their activities, extemporize and give examples' (Meuser and Nagel, 2009, p. 24). Following my research aims and in accordance with Meuser and Nagel's guideline on conducting interviews, questions and topics aimed to reconstruct 'the logic underlying a decision', and to enable understandings of the 'experts' general principles and maxims' (p. 34).

2.4.3. Interview transcription

First, the audio-recorded interview data was transcribed verbatim. This was a time-consuming process; however, it enabled me to familiarise myself intensively with the material, a process Cohen, Manion and Morrison (2013) call 'immersion' (p. 405).

Researchers can apply two main methods in transcribing spoken language: while naturalised transcription 'is a detailed and less filtered transcription' that focuses on 'breaks in speech, laughter, mumbling, involuntary sounds, gestures, body language, etc., as well as content', denaturalised transcription 'is flowing, presenting "laundered" data' which 'accurately describes the discourse' without placing emphasis on 'involuntary sounds' (Mero-Jaffe, 2011, p. 232). One of the major problems associated with denaturalised transcriptions relates to 'biases, such as loss of valuable data that the interviewers decided to delete' (p. 235). My approach to transcription is somewhere between the naturalised and denaturalised transcription. I made notes at points when I got the impression that participants were trying to persuade me of a

particular viewpoint, and when they showed me how they persuaded others. In this way, my analysis is not only focussed on the speech act, but also on reporting what I felt to be strong attempts or emphasis in regard to me – not just colleagues or other university members.

While I noted reactions that I perceived as important to the context (mumbling, hesitations, signs of frustration, impatience, urgency, insecurity), I also 'cleaned' the transcripts of grammatical errors for the purpose of readability. Spoken language often does not adhere to the same grammatical correctness as written speech, and in the case of my interviews it was often accompanied by repetitions and incoherent and unfinished sentences. The following excerpt provides an example of my effort to 'clean' the data while at the same time maintaining accuracy of information:

A) Oral data:

'*I have… you know, been clear, I have always been clear it is, it isn't about your responsibility to stop people to stop them from becoming terrorists, it's your responsibility to have due regard to the need of… to… prevent people from being drawn into terrorism*'.

B) 'Cleaned' transcribed data:

'*I have always been clear, it isn't about your responsibility to stop people becoming terrorists, it's your responsibility to have due regard to the need to prevent people from being drawn into terrorism.*'

As will be clear from this example, the process of 'cleaning' inevitably involved constant subjective judgement. But as will also be evident, I have attempted to retain a sense of quotations from interviews as having been *spoken*, retaining colloquialisms, contractions, and other speech forms that one would not usually find in a formalised written statement.

2.4.4. Data analysis

The data was analysed in light of the categories and codes established during the document analysis. Bowen suggests that those 'predefined codes may be used, especially if the document analysis is supplementary to other research methods employed in the study' in order to 'integrate data gathered by different methods' (Bowen, 2009, p. 33). As emphasised in §1.4.2, the insights gained through a review of universities' documentation of their implementation of Prevent also allowed me to develop topic guides that captured observations I wished to explore in depth during the interviews.

During the interviews, I was able to discuss the content of some of the policy documents and regulations with their authors, which enabled me to clarify details and to explore factors and

considerations that informed the making or enactment of certain documents. In addition, I was able to examine in more detail the justifications for my participants' enactment of Prevent, and the meanings they attributed to their policy documents and on-the-ground enactment. Correspondingly, I used thematic content analysis to capture and interpret 'substantive meanings in the data', as well as narrative analysis that primarily focussed on 'language, and the construction and structure of talk, text and interaction' (Ritchie and Lewis, 2003, p. 202). Eventually, a comparative analysis of the data deriving from higher education policies and procedures and the insights gained through in-depth interviews with those who enact those policies provided the means to discuss and explore the gap between policy and practice.

After thorough familiarisation with the transcripts, I began the iterative process of analysing my data. Informed by the aforementioned theories of securitisation and policy enactment, as well as the categories established during the document analysis, my reading of the interview data focussed on the arguments and rhetorical strategies that were used by RCs to justify the objectives of Prevent, and the arguments that Prevent Committee members used in order to justify their chosen approach. I examined each interview for the various views, justifications, and explanations that allowed for better insight into the factors that shaped universities' compliance with the objectives of the Prevent duty and noted in particular the passages related to compliance, policy enactment, institutional values and cultures, attitudes, explanations, and the objectives of Prevent. Subsequently, I arranged the relevant quotations according to the identified themes and subthemes. Table 2.4.4 (see Appendix A) provides an overview of my approach to coding the interview data.

2.4.5. Data triangulation: documents and interviews

The triangulation of data deriving from policy documents and interviews reflects the study's dual ambition to shed light into the process of policy enactment and into the reasons and justifications for universities' engagement with Prevent. In addition, data triangulation functions as 'a validity procedure where researchers search for convergence' (or in my case both convergence and incongruencies) among 'multiple and different sources of information to form themes and categories in a study' (Creswell and Miller, 2000, p. 126; Cohen, 2013, p. 141). Eisner, (1991) maintains that drawing on multiple sources of evidence enables the researcher to provide 'a confluence of evidence that breeds credibility' (p. 110). Table 6.2 (see Appendix B) provides an overview of the way in which I triangulated the data derived from the IT document analysis with the information I collected during the interviews with my research participants.

2.5. Research Bias and Ethical Considerations

Within the constructivist approaches that frame qualitative research, the researcher functions as 'the primary instrument for data collection and analysis' (Johnson and Onwuegbuzie, 1990, p. 18), which means that qualitative research designs are inevitably susceptible to research bias. While it is recognised that 'complete objectivity is impossible in social research', *confirmability* aims to ensure that the researcher 'acted in good faith', which means they have 'not overtly allowed personal values or theoretical inclinations manifest to sway the conduct of the research and the findings deriving from it' (Bryman, 2012, p. 392). One way of ensuring this is to critically examine the ways in which my own background and position influences the research process.

For this reason, I continuously interrogated my own assumptions and views related to the nature of Prevent and attempted to be open to competing views. I refrained from seeking to collect data in order to evaluate whether Prevent is 'good' or 'bad', particularly because the success of the Prevent policy means the absence of an event (radicalisation; terrorism), something that is impossible to evaluate. At the same time, I acknowledge that my attempt to be as impartial as possible might be facilitated by the fact that as a non-religious, white, German female who is not involved in any form of political activism, I do not form part of the 'suspect community' that was arguably constructed through the early Prevent agenda (Choudhury and Fenwick, 2011).

Another way to mitigate the extent to which my personal views bias the data analysis was to provide thick descriptions of my participants' insights. Throughout my findings chapters, I have introduced as many direct quotations as necessary to allow my readers to come to their own conclusion about the extent to which universities have engaged in securitising mechanisms under Prevent. A strong reliance on direct quotations helped me to balance my own interpretation with the ambition of exemplifying my participants' complex thoughts and understandings. Here, the main challenge was to select the quotations carefully for being the most explanatory for my interpretation, while avoiding an overemphasis on my own interpretation at the cost of my participants' all round views. All in all, my central aim was to avoid any doubt as to the evidential base for my interpretation(s). It is hoped that using thick description, in the form of direct quotations, as a way to counter-act personal biases will increase the transparency and credibility of my research.

Following the approval of my research project by the Oxford Central University Research Ethics Committee, I collected my data in accordance with Oxford University Ethical Guidelines (CUREC, 2016) and the Guidelines of the British Educational Research Association (BERA, 2011). Before every interview, I provided a participant information sheet that included a

description of the aims of the study. Subsequently, written consent was obtained from all the participants, and they were alerted to their right to withdraw from the study at any time and without providing a reason. Furthermore, particular attention has been paid to ensuring the confidentiality and anonymity of the research participants (see §§1.3.1 and 1.4.1 above). I also anonymised the publicly available material and made a strong effort to present policy statements and excerpts of documents in a way that they cannot be easily linked to one specific institution. At the same time, I acknowledge that there is a risk that an expert in the field of higher education, or an internal member of one of the selected institutions, might recognise a specific policy statement or approach to Prevent, and is thus able to identify a specific institution. Accordingly, the participant information sheet that I prepared highlighted the 'low risk' associated with not being able to maintain the anonymity of my institutions.

Care was also taken to ensure that all gathered data was securely stored. For data protection reasons, I refrained from making use of services that automatically transcribe audio data into text; rather, I transcribed all interviews manually.

2.6. Limitations

2.6.1. Limitations associated with ethical considerations

My effort to preserve the anonymity of participants and institutions with more than usual care meant that I was not able to disclose the full context of the institutions and individuals. Several of the universities under investigation have received media attention because of their engagement with Prevent, either because they were accused of over-zealous compliance or because of perceived compliance failure (and even for being complicit in the radicalisation of their students). Those experiences have undoubtedly shaped their wider approach to Prevent. Universities which were previously accused of profiling their students would naturally increase their effort to prevent reoccurring issues. In turn, it is likely that universities which have publicly been 'shamed' for perceived non-compliance would increase their effort to develop more robust approaches to vetting external speakers and to identifying vulnerabilities. Moreover, it is likely that participants of universities which were previously criticised for an overzealous approach were particularly keen to counteract that narrative during the interviews.

However, addressing these factors in my findings would have threatened participants' anonymity, especially because many of the Prevent-related incidents are well known to the sector and the wider public. Not being able to address how the portrayal of universities in the media

and associated reputational considerations have shaped my participants' decisions and rationales is a significant limitation of this study.

2.6.2. Limitations associated with practical constraints

As a DPhil thesis, this project is limited by time and resource constraints, and by constraints of space. This meant that I have only been able to present the data derived from a limited number of interviews. Similarly, although I reviewed over 400 documents of 106 universities, I have not been able to present an in-depth analysis of all the material that I collected. After conducting interviews with twenty-eight university participants, I decided to present the material of twenty-two. Initially, I had intended to dedicate one findings chapter exclusively to the impact of academic expertise on the enactment of Prevent. However, I soon realised that this would go beyond the feasible scope of this thesis. Consequently, I did not include data derived from interviews with several academics. In other cases, I interviewed two or more participants from the same university, and after familiarising myself with the data, I decided to present only the materials derived from the participant with the highest level of knowledge and insight (in line with my ambition to focus on expert interviews). However, I am planning to include my 'outtakes' in future publications. Nonetheless, I acknowledge that not being able to address all possible policy areas and considerations related to universities' enactment of Prevent to the same level of detail is a limitation of this study.

Furthermore, while I was able to collect a wealth of data from a wide range of participants, I interviewed 'only' three out of the eight RCs. We cannot assume that their views represent those of the other coordinators. One focus of my study is to explore how RCs have shaped universities' engagement with the Prevent duty, and what persuasive strategies and knowledge claims they rely on to guide universities towards compliance with the duty. However, their work and interaction is shaped by their local context, which means that not all of my participants interacted with RC1, RC2 and RC3. It is likely that engagement with Prevent is shaped by a participant's relationship with their specific RC. Not being able to include all RCs' perspectives therefore constitutes a limitation of the first findings chapter in particular.

2.6.3. Limitations associated with the research methods

Due to the qualitative nature of the research design, my findings do not claim to be generalisable beyond the participants and the case sites of this project. The study is explicitly based on the understanding that human experiences and understandings are inherently contextual and subjective.

There are several limitations associated with research that is focussed on interviewees' narratives. Roller and Lavrakas (2015) find that 'potential errors in data gathering' can result from 'various factors that can bias participants' narratives and thereby compromise the quality of the resulting data' (p. 308). For example, they highlight that biases can occur because of 'the appearance, mannerisms, and/or personality of the researcher and the intrusiveness or demanding nature, such as asking for a rationale to explain stories and events' (Roller and Lavrakas, 2015, p. 308). I designed my research questions with particular attention to the sensitive nature of the research topic and to the need to engage with my participant in a neutral, non-judgemental and open-minded way. Prior to the interviews, I introduced myself and explained that the purpose of this study is to learn more about universities' implementation of Prevent. I did not disclose that I am interested in processes of 'securitisation', because I did not want to give my participants the incorrect impression that I was exclusively looking for evidence proving that universities are engaged in illegitimate activities. Instead, I explained to them that I am very aware of the controversial nature of the Prevent duty, that I knew that universities have been criticised for their engagement (or non-engagement) in the past, and that I did not want to contribute to this controversy. I also made a conscious effort to standardise my reactions to participants' answers. Instead of agreeing or disagreeing with them, I would say 'that is very interesting' or 'thank you for sharing this insight with me/thank you for clarifying this'. I also employed indirect questions. For example, instead of asking: 'why did you decide to….' I asked: 'How did the committee/the university decide to…'.

Roller and Lavrakas also highlight limitations associated with the research participant, which include the 'accuracy/inaccuracy of recall', and an 'unwillingness to disclose the full story' (p. 228). When I got the impression that my participants were indeed not ready to 'disclose the full story', either because they overtly declared that they could not do so, or because they did not know or did not remember relevant information, I reiterated that the findings of my thesis are anonymised. In some cases, I shared with them how other participants (whom I did not identify) responded to similar questions (without approving or judging their stories) to assure them that I am trustworthy and non-judgemental enough to share their information with me. While this proved a successful strategy to collect a wealth of important and relevant insights, I also have to accept that my participants did not always fully open up. Where relevant, I address this in my findings.

Roller and Lavrakas (2015) consider the 'social desirability bias', where the 'interviewee responding to the interviewer's question in a way that paints him/herself in the best possible light', as a 'particular threat to the credibility of narrative data' (p. 31 see also Bryman, p. 228). I was vigilant of the possibility that my participants would share their information in a way that

'may be the image the narrator wishes to convey to the researcher as opposed to conveying a fully accurate image of what in fact happened' (Roller and Lavrakas, 2015, p. 308). One example was particularly telling. When we talked about universities' approaches to monitoring and blocking access to extremist online material, RC3 explained to me that University C was planning to introduce those measures in the future in response to a heightened awareness of the threat posed by online extremism. However, when I talked to P.C, they explained that they conceived content blocking and monitoring as inefficient and that their university took a clear stance against introducing these measures under Prevent. There are a variety of possible reasons for this incongruency. It may be the result of a genuine misunderstanding between RC3 and University C. Alternatively, University C might have suggested to the RC that they would change their approach in the future to signal compliance without really intending to follow through. Yet another explanation could be that University C was planning to introduce monitoring and blocking but did not want to share this with me. As a researcher, I was careful not to interfere in the relationship between universities and RCs, which is why I did not confront either of them with this incongruency. This means that I was unable to discover the reason for their contradictory accounts. This example is important, because it highlights the limitations associated with the chosen method of data collection.

3. EXTERNAL PARTNERSHIPS: FRAMING COMPLIANCE AND POLICY ENACTMENT

Chapter overview

We saw in Chapter 1 (§1.2.5.1) that universities' initial responses to the Prevent duty were varied. Some universities accepted their role in countering terrorism and radicalisation, while others rejected the government's justifications for incorporating universities into the legislation. This chapter explores the factors that shape universities' varying engagement with the Prevent duty. Specifically, I aim to analyse in more detail how the relationship between universities and external partners, especially RCs, shapes universities' delivery of Prevent. Drawing on data derived from interviews with three RCs this chapter explores how their consultation and advice has shaped universities' approaches to implementing Prevent.

3.1. DE-SECURITISING PREVENT OR SECURITISING VULNERABILITIES?

The data that I have collected reveals that Prevent has undergone a discursive shift since its original introduction. Specifically, the duty has been reframed as a welfare rather than as a security measure. This shift of language seems to have occurred as a result of several universities' initial rejection of the arguments that were employed to support the need for Prevent (see §1.2.3). In particular, it has been designed to resonate with universities' institutional values and cultures. The RCs confirmed that they were aware of universities' responses to the early government consultation, to which over fifty institutions contributed. RC1 acknowledged that '*from the beginning, many universities wanted Prevent to be part of their wider safeguarding approach, but they couldn't see how it would fit in there, the way it was framed at that time*'. The consensus for the '*need of changing the language*' was the result of a dialogue, where universities' responses and suggestions contributed to the rhetorical shift that was subsequently employed by the RCs.

RC1 confirmed that since its introduction '*Prevent shifted its focus tremendously*'. At the heart of this shift lies the RCs' effort to revise the securitising speech acts that previously framed Prevent. RC1 explained that reframing of Prevent was necessary in light of the criticism they faced from university members: '*we needed to get our language right. We needed to make sure the message is clear, because I think that's not been helpful previously*'. Consequently, they employed various rhetorical strategies and modes of persuasion to de-securitise the Prevent duty. For example, they positioned themselves on the side of universities, which '*were right to challenge the perception of them being breeding grounds for extremism and terrorism*'. RC1 explained that this initial

allegation was the result of an interpretation of '*statistics that show that over 30 per cent of convicted terrorists in the country have been to a UK university in a nine year period*'. RC1 stood up for universities which rejected being framed as a security threat and explained to their superiors that '*you've got it all wrong if you look at it from the perspective of universities as being the problem. This view is not helpful, and it needs to change*'. They encouraged politicians to assume a different perspective that allowed for '*the conclusion that a third of people that went to be convicted terrorists were students, and if we could have identified concerns, we might've been able to stop that from happening*'. This argumentative shift frames universities as '*part of the solution and not as part of the problem*', and although it aims to achieve the same outcome – universities' genuine and active participation in the government's Prevent agenda – it does so by constructing them as allies of the state, rather than as their enemies. They sought to gain universities' trust by trying to convince Prevent Leads of the RCs' genuine effort to provide guidance and support, and by distancing Prevent from traditional surveillance mechanisms: '*we don't follow a hidden agenda that could be harmful to the institutions or their students, quite the opposite*'.

RC1 further aimed to disassociate the Prevent duty from any security connotations that could undermine its success in the higher education sector by presenting an alternative, de-securitised framing of Prevent, one that '*is about support first and foremost*'. RC1 was convinced that '*the problem with the general overview of Prevent is that people focus on a very sort of superficial part of what it is*'. Consequently, the widely criticised securitising effect associated with the Prevent duty is merely a sign that '*there is a real lack of understanding of just how much support and protection is put in place*'. As a way to '*challenge th*[is] *one-sided interpretation*' of Prevent as a securitising policy, they emphasised that the '*main focus of Prevent lies in support and safeguarding*'.

To convince universities that accepting Prevent does not require them to assume a role in the security apparatus of the state, but rather to function as a support net for their students, RC1 drew on multiple anecdotes that focused on cases where universities have supported their students. For example, in one case, a Prevent Lead called RC1 to share information about a student who had been on a vacation in Sri Lanka during the Easter Bombings. The student, who returned rather '*traumatised after having been locked in a cellar for ten hours during the explosions, not knowing what was going on*', was just about to take their exams. RC1 emphasised that the Prevent Lead's decision to share information about this students with them under Prevent was rewarded, because they were able to obtain '*support for the whole family through the Survivors Assistance Network Foundation for Peace*'. RC1 emphasised that '*all this package is support*'. RC1 portrayed Prevent as a support system in place to care for the victims of terrorist attacks and appealed to Prevent Leads' emotions, their empathy and their readiness to care for and to provide welfare to suffering students: '*When I tell people of all the ways in which Prevent can help people they start understanding*'.

RC1 also emphasised the importance of narrations as a rhetorical mode of persuasion that appeals to their audience's emotions and the values they hold: '*it is so much more helpful to give them examples, to show the real life impact they can make, rather than just confronting them with unclear, or say, controversial documents*'.

3.1.1. 'What Prevent looks like on a piece of paper is just a small part of what Prevent actually is'

RC1 agreed with my subsequent comment, to the effect that their emphasis of Prevent as a support system for victims of terrorist attacks, rather than as a tool to identify individuals vulnerable to radicalisation, is not at all reflected in the objectives stated in the Prevent duty guidance. However, they added that '*if you, as a university, take that interpretation literally, and if you don't think outside the box, then you can't fulfil this really important welfare opportunity*'. Although this 'welfare opportunity' is only one element of the statutory guidance, alongside the much more highlighted role of identifying and mitigating potential security risks posed by radicalising influences, they emphasised that it is '*the most important part of Prevent; it's about all sorts of support*'. In an effort to shift the rhetoric of the Prevent duty, they encouraged Prevent Leads '*not to get too caught up with all the documents of the duty. Let's simplify it and focus on our main goal, which is to support students*'. They admitted that the aims of Prevent as drawn out in the official documents are not fully congruent with the aims that Prevent should really serve (in their opinion): '*Going back to what Prevent is, what Prevent looks like on a piece of paper. This is just a small part of what Prevent actually is*'. And while the official documents may not be clear about it, RC1 '*absolutely believe[s] we have the best intentions*'.

This statement reveals the genuine effort of the RC to de-securitise Prevent in the first stage of the policy implementation process: they deflected from any security elements implicit in the official governmental guidance by highlighting the government's and universities' shared values of protecting and supporting vulnerable students. RC2 added that in the early implementation, Prevent was indeed '*first and foremost a security concern*', one '*that was initially looked after by the legal compliance or security teams of universities*'. In turn, this had sparked '*significant scepticism*'. Like RC1, they explained that the collective effort to de-securitise Prevent in the implementation process was '*a journey within the sector*' that required RCs to distance the '*real*' objectives of Prevent from '*those implied in official governmental guidance*'. For RC3 this meant drawing a clear distinction between universities' obligations under the duty, and those attributed to security and law enforcement officials. They explained to Prevent Leads who were sceptical of the role they ought to play under Prevent, specifically with regard to intelligence sharing, that '*the police is the police, trust me they have the information they need. They don't need universities to provide*

any further.' Once vulnerable students have '*passed that tipping point*' to violent extremism '*then we'll have the information*' and '*don't need universities to provide that information*'. They added that

> *Prevent for me within the context of the actual government Prevent strategy is about safeguarding individuals. It's got nothing to do with securitising. That's the message I want to get out. And they don't need Prevent Coordinators, they don't need safeguarding staff in universities to securitise the situation. They just need to focus on welfare.*

But according to the RCs, not all Prevent Committee members rejected the prospect of assuming a security position. RC1 confirmed RC2's observation that some universities were prone to '*initially looking at Prevent from a securitised perspective*' and RC1 reiterated their commitment to de-securitising the duty by ensuring that universities understood their safeguarding responsibilities. And similar to RC3, they sought to ensure that '*universities don't make Prevent something it isn't, that they don't share information beyond what they need to share, that they don't – because of the vagueness of the guidance – think that they may out of caution actually go further than is expected from them*'. They also aimed to reassure universities that Prevent differs significantly from any sort of 'real' security strategy: '*there isn't anything scary about Prevent, it's not about information intelligence sharing, quite the opposite. We support and safeguard vulnerable individuals*'.

RC2 considered their effort to reframe Prevent in terms of safeguarding a successful strategy to achieve higher levels of acceptance with Prevent: '*it's now increasingly sat within the welfare and safeguarding area and student services, where it fundamentally belongs*'. Similar to RC1, they explained to their assigned Prevent Leads that '*Prevent doesn't fit within a security lens despite being counter-terrorism*'. In order to assure universities that their involvement in the Prevent duty does not shift their responsibilities into the security realm, RC1 drew an analogy between radicalisation and other safeguarding issues: '*it's about trying to keep people from harm in the same way that we'd want to be preventative around alcohol abuse and gang abuse*'. Once they '*were able to convey what it's really about*' the '*scepticism has softened*'. Effectively, RC1 and RC2 argued that the vague language of the Prevent legislation and statutory guidance only causes negative effects if it is taken too literally. They therefore encouraged Prevent Leads to adopt a narrative of Prevent that is exclusively focussed on welfare and support. In their effort to persuade university governance to accept their responsibilities under Prevent, the RCs discretionarily modified the original speech acts by employing an alternative, diversionary language that distances the 'real' purposes of Prevent from those outlined in its legislation and associated guidance. This served to uphold the legitimacy of the duty.

At the heart of their efforts to re-articulate and thus de-securitise the objectives of Prevent lay the RCs focus on 'vulnerability' as opposed to 'criminality'. RC1 repeatedly emphasised that '*Prevent is around the non-criminal space*'. Challenging the identification of students as potential threats, they added that '*I don't like the phase pre-criminal, because I think that ultimately suggests that the person is on an inevitable road that would involve criminality. And I don't think that is the case*'. Drawing on this understanding, they aimed to draw a conceptual distinction between the Prevent duty, which deals with safeguarding, and Pursue, the second stream of the government's counter-terrorism strategy, which is concerned with security practices: '*I have always been clear, it isn't about your responsibility to stop people becoming terrorists, it's your responsibility to have due regard to the need to prevent people from being drawn into terrorism. These are completely different things*'. They added that universities '*need to understand that they have a responsibility, one that is now a legal duty, and supporting your students is what I believe you should do to demonstrate compliance with that duty*'. This interpretation of universities' responsibilities under Prevent highlights the provision of support, rather than the identification and prevention of potential terrorist activities, and thus places Prevent in a non-criminal, non-securitised sphere: '*the first real… thing that we need to get in front of as many people in senior management teams and chancellors, to try and say: "look this is what it is, there isn't anything scary about this*'".

3.1.2. Student vulnerability and the 'river of radicalisation'

The RCs' understanding of Prevent as functioning exclusively in the non-criminal sphere is somewhat incongruent with the policy guidance, which not only focusses on preventing radicalisation to non-violent extremism, but also on violent extremism and ultimately terrorism. Moreover, the Prevent duty guidance implies that the distinction between non-violent radicalisation as a pure welfare concern and violent radicalisation as a security concern does not hold up. By identifying 'non-violent extremism' as a threat that 'can create an atmosphere conductive to terrorism', which in turn 'can popularise views which terrorists exploit' (para 19), the guidance indicates that non-violent extremism is not merely a welfare concern, but that it also poses a security risk.

Despite RC1's genuine efforts to de-securitise Prevent, they were not fully able to confine the duty to a completely non-criminal, safeguarding-oriented space. In opposition to their previous distinction between the non-criminal space of vulnerability and radicalisation and the criminal space of violent extremism and terrorism, they eventually confirmed the threat potential posed by non-criminal views and activities. For example, in direct contradiction to their earlier statement, RC1 referred to an inevitable transition from vulnerability/susceptibility, to adapting

non-criminal belief systems, to engaging in criminal activities. They did so by drawing on the analogy of 'the river of radicalisation':

> *Think of it as a river upstream in the foothills, before someone becomes too entrenched in their point of view. Here you try and make sure that people engage in critical thinking and start looking at different perspectives. It's still their decision what they come up with, but it's your responsibility under Prevent to be aware of people who are saying some things of concern in those foothills, because it's easier for us to try and give them support and help. The further down the river, the harder it's going to be to reach in, to stop them going down that stream into the sort of wide mouth, where the river is tipping into the sea. I think I see the sea as the line of criminality basically.*

On the one hand, this analogy aims to distinguish Prevent from Pursue. While the 'river of radicalisation' is the domain of Prevent, the 'sea of terrorism and criminality' is not: '*if there is any criminal stuff going on that isn't Prevent, that's Pursue*'. On the other hand, the analogy draws a linear connection between radicalisation and violence, and in turn entails the warning that without early detection, vulnerability inevitably leads to terrorism. Universities' failure to take their welfare responsibilities seriously will ultimately lead to severe harm.

Despite their previous effort to de-securitise Prevent, RC1 eventually slipped back into the securitising narrative that frames the student not only as 'at risk', but also as 'the risk'. Here, RC1 aimed to achieve universities' compliance by conflating security with safeguarding. They appealed to university governors' emotions and sense of responsibilities, and sought to persuade their audience of the threat by drawing on evidence that supports their logic of radicalisation. For example, to convince universities of the key role of 'untreated' vulnerability as a precursor of violent extremism and terrorism, RC1 drew on the case of David Copeland, the London nail bomber from 1999: '*He was bullied for being short in stature in primary school, he was assaulted and hospitalised by people from the black and Asian community. In secondary school, nobody deals with that to his satisfaction. He feels grievance and injustice in the fact that nobody dealt with this appropriately*'. This eventually '*adds to low self-esteem and confidence issues*' which rendered him susceptible to violent radicalisation: '*when he goes online he meets people from the New Nationalist Socialist Movement, they feed that injustice. Both the way he's been treated and the way institutions were not supportive. And they basically said "you need to do something about that"*'.

The RC did not claim that 'being short in statue in primary school' or being bullied and harassed causally leads to violent extremism; however, they did emphasise the generalisable threat stemming from a wide range of vulnerabilities. RC2 likewise stated that '*Prevent is about the early identification and the safeguarding of those who are more likely to be at risk and susceptible*', and provided

more insight into the indicators of vulnerabilities. For example, they declared that '*mental health and autism is something that comes up a lot in terms of a vulnerability*'. Somewhat contradictorily, they then added '*but being very clear that doesn't mean that somebody with mental health issues or autism means that they are more likely to be exploited, but that those are vulnerabilities that can be exploited*'. With this statement RC2 wanted to clarify that they did not view people with mental health issues and autism as higher security threats than anyone else, and again explained that those risk factors are only relevant for providing support: '*we want to create a culture that is cognisant*' of the possibility that *'if someone hasn't been healthy, that they are going to be more likely to be radicalised, so they might need more support*'. Confronted with the challenge of advising universities about potential risk factors in the absence of factual certainty, RC2 engaged in apophasis: they introduced an issue (in this case mental health and autism) into the discussion, while at the same time maintaining plausible deniability. In this way, the RCs were able to add a variety of vulnerabilities to the 'risk of radicalisation' list.

Similarly, RC1 stated that international students, especially those from '*countries at war or in political conflicts*', are in particular need of increased support: '*I want to bubble wrap those international students and find out what they were subjected to*'. This statement documented the conflation between safeguarding (bubble wrapping) and security and intelligence gathering particularly well:

> *I want to know what they are subjected to on a daily basis on their walk to the university. I want to ask them: "Are you subject to hate crime, discrimination, are you treated intrinsically different in that space? Do you feel like you are getting the same opportunities as we're getting?"*

While this statement revealed genuine concern for the wellbeing of international students, RC1 also added that the desire to gain as much information as possible ultimately served the purpose of reducing the security threat: '*What can we do to make sure radicalisers can't utilise your concerns to get where they want to?*'. This statement portrays vulnerable students as lacking agency, and implies that without intervention they are doomed ultimately to become the puppets of extremists. In turn, this stance attached to safeguarding measures a security intention, which became particularly evident when RC1 explained *why* the student who survived the terrorist attack in Sri Lanka received support: '*what makes people susceptible is loss and bereavement, specifically bereavement in relation to people being subjected to a terrorist attack*'. Offering the student support to cope with a traumatic situation did not merely serve the purpose of enhancing their wellbeing, but also of reducing the threat stemming from the possibility that this student may now be more vulnerable of being drawn into terrorism themselves.

While RC1 drew on single case studies in support of their pre-emptive approach to countering terrorism, they did not engage with the fact that most individuals who might be deemed 'vulnerable' do not hold extremist views, and that the majority of those who do so do not go on to engage in violent extremism. Framing a large number of individuals as susceptible to radicalisation, which is in turn understood as the precursor to terrorism, facilitates the securitisation process, where students are viewed through a national security lens. In this way, the emphasis on vulnerability, which is a common term in humanitarian aid and child protection, did not de-securitise the issue, but rather expanded the threat level by allocating risk potential to formerly unthreatening conditions. When I noted that '*most students I know have some sort of vulnerability, whether emotionally, financially, socially or politically*', all RCs firmly agreed. RC2 added that '*this is precisely why Prevent is so important, especially in the university sector*'. In this way, a very large number of students and their vulnerabilities come to be viewed through a national security lens, and not merely through one of safeguarding.

3.1.3. The conflation between safeguarding and securitisation

RC1's contradictory statements reveal competing ideas about the purpose of Prevent. In a purely non-criminal space, Prevent would focus on addressing vulnerabilities that could eventually lead to radicalisation. In contrast, in the pre-criminal space, Prevent addresses extremism that has not yet taken form in violence or other criminal activities, but that is expected to escalate into violence if left without intervention. The Prevent duty guidance does not provide further clarification. Rather, it assures universities that 'help and support will be available' to identify non-violent extremism. So when I asked RC1 how they draw a distinction between religious and political (non-extremist) conservatism and non-violent opposition to British values (non-violent extremism) they somewhat impatiently responded that '*that's what we have to get over with in Prevent*', and that '*Prevent is about stopping people from getting involved in the violence associated with all this*'. When I dug deeper and asked '*where does "non-violent opposition" sit in that space*', they explained that '*it is in the counter-extremism space*' and that '*these have been conflated at the moment*'. While the Prevent duty is premised on a definition of extremism as non-violent opposition to British values, and ultimately aims to prevent people from extremism, RC1 did not occupy themselves with the deeper meaning of official definitions: '*Whatever the policy says, what we are trying to do in Prevent is we are trying to ascertain what's happening and almost bubble wrap them in a package of support, give them an opportunity to gain a different perspective, idea, a point of view*'.

Rather than offering clarity about the precise aim of Prevent, the interviews with the RCs revealed that its scope is debated, and in many ways contradictory. The one clarity all RCs aimed to provide is that Prevent exclusively relies on safeguarding measures that serve the intention to,

as RC1 put it, 'bubble wrap' vulnerable individuals. Tired of those who continuously challenged Prevent on the ground of its ambiguous conflation of non-criminal, pre-criminal, and criminal views and actions, RC1 went on to argue that a lack of audience acceptance poses a risk in itself, '*because it allows people who are detractors of Prevent to say that under Prevent, we are making certain assumptions that could be harmful to students*'. They further maintained that a critical attitude towards Prevent can play into the hands of terrorist organisations. This became particularly apparent when RC1 explained how they dealt with critical voices within universities:

> *I would ask those people with whom they are sharing this criticism. Sometimes people who criticise Prevent have their own hidden agenda. To those, Prevent might actually be detrimental. I am not saying that they can't get their point of view, but for some organisations and people, Prevent is detrimental to what they are trying to achieve. Do you really want to support those people?*

This line of argumentation is a popular strategy of polarisation – the idea that 'you are either with us or against us'. This form of flawed logic, where there is no alternative or middle ground, is a very powerful speech act and a common form of persuasion (Matter, 2005). It was famously used by George Bush in his anti-terrorism campaign, where he emphasised that 'either you are with us, or you are with the terrorists' (Bush, 2001). Here, university governance is framed either as an ally or deemed to have joined the enemy.

Moreover, the strategies employed by RC1 to achieve acceptance of, and compliance with, Prevent amongst university governance are revealed to contain a further contradiction. On the one hand, they emphasised that Prevent is exclusively about safeguarding; on the other, those who are unwilling to subscribe to their narratives are framed as sympathisers of terrorism. The RCs efforts to re-frame Prevent as a safeguarding responsibility rather than as a security practice fail because they never fully achieve a distinction between vulnerability and criminality, and thus between safeguarding and security. Maybe unintentionally, and in their genuine effort to de-securitise Prevent, the RCs served as 'street-level securitisers' who used their discretion to re-invent Prevent in terms of safeguarding in order to achieve higher audience acceptance within university governance. However, the interviews also suggest that the RCs did not manage fully to disassociate Prevent from any security intentions. The subsequent sections of this chapter will show that the dual emphasis on students 'at risk' as well as 'the risk' shapes the RCs' practical advice related to identifying risk sources and to implementing safeguarding measures in response to Prevent.

3.2. UNIVERSITIES' RISK PROFILES

Paragraph 16 of the statutory guidance requires 'active engagement from senior management of the university' with 'other partners including police' and regional 'Prevent co-ordinators' (**HEFCE**, 2015). As one element of this partnership, the RCs feed universities information and advice that helps them to identify the risk of radicalisation on their campuses. RC2 explained that this primarily revolved *'around ensuring that they* [universities] *understand what the risk picture is'*. This section aims to provide a deeper insight into the development of universities' risk assessments and action plans to mitigate the identified risks.

While the Prevent duty guidance requires universities to 'carry out a risk assessment for their institution', it does not reveal how universities are supposed to identify the risk to which they are exposed. When I asked the RC's about the factors that shape the OfS' classification of universities as low/high risk, RC2 initially said that '*I don't know how the Office for Students ultimately decide*'; RC1 likewise admitted that they '*don't know what their criteria is*'. In a similar vein, RC3 remained vague about '*the various factors that may play a role*'. However, when I directed the conversation to the potential impact of the different threat levels associated with extremist activities in different regions of the country, the RCs offered more insight into the factors that shape universities' risk profiles.

During my research on factors that may shape universities' risk profile, I came across the *Prevent Toolkit for Local Authorities and Partner Agencies* (Home Office, 2015). The governmental document states that 'the Prevent Duty requires all local authorities to utilise the Counter-Terrorism Local Profile (CTLP) to inform the risk of radicalisation and produce a proportionate partnership action plan to tackle these risks' (Home Office, 2015, p. 3). The *Counter-Terrorism Local Profiles, an Updated Guide* (2012) explains that a CTLP 'is a report that outlines the threat and vulnerability from terrorism-related activity within a specific area', which aims to 'develop a joint understanding amongst local partners', to 'provide information on which to base local Prevent programmes and action plans', and to 'allow a targeted and proportionate use of shared resources' (HM Government, 2012, p. 7). There are two different security classifications for the CTLPs. The RESTRICTED CTLP includes 'a crime overview; information on community tensions; and the context of threats from other forms of extremism', and might cover 'data on crowded places and hazardous sites' in order 'to enable partners to consider where they can contribute to reducing vulnerability to a terrorist attack', as well as 'information from ports and the United Kingdom Border Agency (UKBA) on national and international migration and demographics'. Moreover, the document relies on 'commuting or migration patterns', and adds that 'whatever information sourced ends up contributing most significantly towards the CTLP should be included' (HM Government, 2012, pp. 7,8). Because of the 'potentially highly sensitive

information about communities', the authors of the CTLP 'should consider carefully how to present information so that it is clearly understood by all and not misinterpreted' (HM Government, 2012, p. 8). The dissemination of the RESTRICTED CTLP is based on the 'need to know principle', which means that the 'dissemination of sensitive information and assets should be no wider than is necessary for the efficient conduct of an organisation's business and, by implication, should be limited to those individuals who are appropriately authorised to have access to it' (HM Government, 2018, para 11). Beyond this RESTRICTED document for local partners, the police also produces one for counter-terrorism practitioners, 'which, due to its sensitive content, will be marked at a higher classification' (HM Government, 2012, p. 8).

None of the policy documents clearly state that university members are granted access to, or are involved in the composition of, the CTLP. However, the *Guidance for police officers & police staff to help Higher Education Institutions to contribute to the prevention of terrorism (2012)* recommends that the police 'assists the local authority to carry out needs assessment of Prevent support for the HEI, drawing on the CTLP' (ACPO, 2012, p. 16). Although this recommendation cannot be read as evidence that all universities have access to CTLPs, it suggests the possibility that university risk assessments may draw on information derived from CTLPs.

I followed this lead by investigating how information related to the CTLP might inform universities' risk assessment during my interviews with the RCs. Once I brought up the CTLP, RC1 confirmed that this was in fact one of the '*major parts of my role, because originally universities weren't informed because that was usually an Official Secrets document. Even when it was broken out a little more, it was not deemed that it should go to a wider audience. It should only go to restricted personnel*'. So while RC1 could not share the document initially, they met with university representatives in person and provided information that they thought was meaningful for the respective institutions. They explained that '*part of universities' obligations is to draft a sort of risk assessment. Obviously it's difficult to draft one that is relevant if they don't have this intelligence to do so*'. In a similar vein, RC2 explained that '*our role as coordinators is to essentially digest those Counter-Terrorism Local Profiles and share that*'. RC2 shares information as part of '*a monthly digest to all HE providers, which contains information about what the current risk is*'; furthermore, they initiate '*meetings with these providers to ensure that they're always kind of up to date with what the current risk picture is*'.

RC1 emphasised that CTLP-related information is essential for the development of universities' risk assessments: '*ultimately, how can you assess the risk in your organisation if you are blind to some of the stuff that's going on around you?*'. And although RC2 agreed that '*the CTLP is absolutely necessary; it's good to have*', they added that '*I don't think it's a ground-breaking document*'. RC2 downplayed the importance of the intelligence provided in the document, because this was '*information which you'd pretty much be able to find out yourself from researching, from looking at hate*

crime published statistics and that kind of thing'. While '*there are a few bits here and there that would be a bit more sensitive*', they contradicted RC1 by declaring that '*it's not a secret document. It's an officially sensitive one, which means that there is some sensitive information*'. However, when I told them that I was not able to identify all high risk (or Prevent priority) areas in the country on the basis of open-source material, and that consequently universities must be in need of additional information, they reluctantly agreed that '*that's not being disclosed*', and that universities are in fact recipients of '*more sensitive information*'.

RC2 seemed uncomfortable to admit that universities under Prevent engage in any security activities that involve accessing restricted intelligence, while RC1 emphasised the very need for universities to do so. Although RC1 agreed with RC2 that '*you can look through local media, social media, you can get a flavour for what's happening, a university may already have some knowledge about gang violence or criminality*', they also insisted that '*what you really want in this space is more*'. The interviews with the RCs revealed that the CTLP is closely related to universities' risk profiles in several ways.

RC3 explained that initially, when the government introduced Prevent, they '*brought in a measure at the time to protect individuals from being radicalised. And the number one threat at the time was an Islamist threat*'. In their view, this explained why '*Prevent was seen as targeting black, Asian and minority ethnic groups*', because '*the reality was that funding for Prevent, for dealing with radicalisation, was based on risk factors. And the risk factor that the government used was "well, who was the threat?", and the threat was an Islamist threat, so the risk areas were identified with high populations of BAME individuals*'. RC3 admitted that '*this was quite a blunt tool in relation to how police forces and other government departments dealt with that*'. However, RC3 also explained that over time, Prevent has become more nuanced. Although '*the government still uses BAME populations as one of the factors in relation to how they give funding to areas*', they now include the CTLPs, and take into account '*hate crime, terrorist arrests, and Channel referrals*', which do not exclusively focus on Muslim populations but offer '*a more holistic approach to the threat*'. And although RC2 was '*happy to tell you – and I think you worked it out yourself – that DAESH is still the kind of greatest threat*', RC3 revealed that '*because we look more refined at the threat, you will be able to negate the narrative that Prevent is just targeting Muslims*' and explained that the rise of right-wing radicalisation was well documented too.

The RCs were able to counter the narrative that Prevent is exclusively targeting Muslims by revealing that Prevent priority areas are now not merely identified on the basis of their BAME population, but also based on more nuanced information about local threats, suggesting that Prevent is now responsive to all forms of extremist threats as they occur, including right wing extremism. As RC3 put it, while '*initially the only measure for funded Prevent-priority areas was the*

population make up', now '*it's based on all those other factors put together, and that comes up with the fifty funded areas across the whole country*'. RC3's insights thus reveal that under Prevent, different areas are treated differently. RC2 confirmed this, explaining that, for example, '*London is pretty different from other areas*', because '*you have a large amount of priority area*', and in turn, '*you've got a large amount of resources, you've got the Met police rather than more local police bodies*'.

The information provided in the CTLP impacts on how much attention an area receives from Prevent practitioners, which in turn has direct implications for universities. For example, those who are located in Prevent priority areas seem to be automatically classified as at higher risk by the OfS: '*they will take into account a variety of risk factors. For example "is your university in a funded area?" So for example, University D is in a funded area, so they know that they are going to be clustered as at risk, they are already higher up than universities like for example University C*'. RC1 explained that especially for universities which are considered as higher risk, gaining more nuanced information into the Local Profile of their area was important because '*instead of walking out of the front door not knowing whether it's to the left or the right, the institution at least has a clue which direction we should be going*'. They revealed that knowledge of the local risk was important because it allowed universities to estimate the risk of their students being exposed to radicalising influences. They explained that the external, local risk is directly related to student vulnerabilities:

> *So we have got a large Libyan community, and bearing in mind that the perpetrator of the Arena bombing was part of that community, it is massively important to know the sort of makeup in the HE space, how many Libyan students we've got within our institutions and organisations. What support is available to them, do they come from a particular part of the community, what part of the town is it that they live in? Have there been reporting intentions or concerns? Have there been issues just in relation to the fact that they are Libyan and the perpetrator of what's happened was Libyan?*

RC1 drew out particularly lucidly how each university's risk profile is shaped by a variety of interconnected factors. First, universities have to consider the external threat level. But how and whether this impacts on their institutional risk profile then depends on the vulnerability level of their students, which in turn is shaped by the extent to which they are considered exposed to the external threat: '*There may be external influences on them that actually put them in a space where they are more susceptible, more vulnerable to the person coming along and feeding their grievances and the injustices and try to get them to move into a space where they are susceptible to radicalisation*'.

RC2 confirmed that '*in terms of risk assessments, universities should look… internally,* [at] *their own process and their own risk due to their own learners, and their geographic proximity. At the same time, you've got to be aware of that broader geography*'.

From these comments I deduced that not only national geography but also the student make-up (and – in light of the perception of an ongoing threat posed by DAESH – a particular focus on the Muslim student population) must shape the OfS' risk classification of universities. RC3 finally revealed that '*the current position with the OfS is that they will take into account risk factors*', which include whether '*you had a major incident at your university*' and '*had anybody arrested who's a terrorist, for example*'. However, when it came to evaluating the impact of the student population on the OfS' risk categorisation, they responded that:

> *All I can comment on is that the Muslim student population does not impact on the decision whether they* [the university] *are at risk or not. The one factor which could make an impact relates back to the government's funding for demographics, whether it becomes a funded area. And if you're in a funded area, that impacts on the risk.*

In this way, they admitted that '*there is a very minimal, almost third-party risk impact*', explaining that '*if you have a high density of Muslim students, that in the past has been one of the factors which has been considered by the Home Office to classify a place as a funded area*'. Although '*nowadays it's obviously more nuanced, it still has a minor impact on it*', because

> *the OfS considers whether a university is located in a funded area as one of the risk factors as to whether you are a risk university. So if it's a funded area, that constitutes a potential risk for the OfS, not the student demography in the university. But clearly, going full circle, the composition of the university has an impact on the demographics where the university is.*

RC1 expressed uncertainty about the factors that render universities at higher risk in the eyes of the OfS. While they confirmed that '*as part of their monitoring process, they* [the OfS] *deem certain institutions to be more at risk*', they also found that the precise risk criteria are rather opaque. On the one hand '*it's not really about the institution, it's about their demographic, it's about the threat level*'. On the other hand, that '*doesn't mean that because* [universities] *are in a high risk area*' they will be ranked as high risk: '*so for example, University D is not deemed as high risk by the OfS*'. They explained that '*it's all an amalgam of things*', where '*they've pulled all the information*', including '*information from the institution, then presumably information from the Counter-Terrorism Local Profiles*'. They added '*it's the risk and threat, it's the demographic. It's about the risk based on the intelligence picture, but it's*

also about the size of the institution'. They added that the student demography is likely to play a role in this risk assessment as well: '*it might just be the number of international students that are there*'. This was the case because RC1 considered them '*as being more susceptible in terms of what they may be subjected to. What they may be exposed to would cause concern. Just generally, they are in a brand new environment, miles from home without the support and safety net that they would usually have around*', adding that '*their countries may hold completely different values, and they may well be coming from areas where foreign policy has affected their lives*'. In this context, RC2 added that '*I'd be very concerned about singling out a country or nationality or anything like that*'. While they agreed that there may '*possibly be risks that would need to be considered about the international aspect*', this '*would have to be done very, very sensitively indeed*', because '*you would never want to profile, you wouldn't want to single out*'.

From the above evidence, we can conclude that while all RCs emphasised the wide range of vulnerabilities prevalent among the whole student body (perhaps in an effort to avoid profiling particular groups), it was nonetheless the case that some students were considered as more likely to be vulnerable to radicalisation than others. While the OfS risk classification is far from transparent, it became clear that it is informed by factors associated with the local risk profile as well as the student demography.

Moreover, RC2 revealed that '*the OfS will… look at how the university has previously engaged with the Prevent program*'. So while '*it's not the one determining factor… one of the factors that they will consider'* would be '*if they* [the university] *are rejecting* [the Prevent duty] *and the key individuals* [who previous rejected it] *are still in place*'. In other words, one element of the OfS risk evaluation is to examine whether a university is complying with the statutory guidance. This could provide an explanation for the low risk that RC1 attributed to University D: it is possible that the institution was able to compensate for their high-risk location and their prevalence of students considered more vulnerable to radicalisation than others by demonstrating satisfactory levels of engagement with the Prevent duty. Compliance seems to serve as a protective factor that the OfS weighs against the risk factors associated with the demographic and student profile.

3.3. Compliance: risk mitigation through safeguarding?

The identification and mitigation of potential risk sources constitutes one determining factor for the OfS risk categorisation, alongside the risks posed by external threats and student vulnerabilities. In turn, universities are expected to include in their own risk assessments how they intend to mitigate potential risk sources. Here, RC2 explained that while '*there are some things I would say they should definitely consider*', they '*wouldn't say that some risks are higher than others,*

that there is a hierarchy'. Overall, the areas raised by the RCs correspond to those outlined in the Prevent Duty guidance. RC3 emphasised that

> *the key message for all universities in relation to welfare is to look at areas of potential risks and then the exposure to those risks. Potential risks are linked to the ability of staff to be able to make a referral if necessary, to the mechanisms they have in place to do that. And of course, exposure to potential extremist speakers, and online material. It's simply the three areas and about their internal mechanisms to deal with this.*

All three RCs explained that as part of the umbrella aim of 'safeguarding' universities should: (1) have internal and external information-sharing structures; (2) minimise the risk-exposure on campus by vetting external speakers; and (3) minimise the risk-exposure online by considering blocking and monitoring access to extremist material. RC2 explained that '*we're there to support, to provide advice and guidance. That could be about all possible safeguarding conversations, around the policies and procedures as to where risk assessments might come in*', for example around '*training and how and when to report an individual at risk*', and '*around speakers*'. They added that '*the key thing is about making clear that the policy is about safeguarding. Making clear what the referral process is, they're kind of the fundamental things*'. In a similar vein, RC1 explained that the point of providing information about the risk profile is to help universities '*develop their own risk responses, that's what should be feeding their policies, feeding their training products*'.

While one might expect that the different risk profiles at the universities translate into nuanced advice on the ways in which universities respond to them, the RCs revealed that their focus is always on the same sources of risk, irrespective of the institution. However, they also suggested that within those policy areas, universities have certain levels of discretion, which in turn translates into different approaches to policy enactment.

3.3.1. Identifying vulnerability to radicalisation: training

One topic I was particularly interested in was how the RCs provide training to universities on how to distinguish religious and political conservatism from vocal opposition to fundamental British values, noting the lack of clarity associated with the government's definition of non-violent extremism. Here, RC2 explained that in practice '*universities are not using this definition as part of their training*', and that '*it does need to be simplified often when you are having the conversation*'. They added that '*part of the training is trying to break down the definition of extremism*'. RC2 explains that '*I focus on the emphasis on intolerance as the key aspect of* [extremism]'. Drawing on the example of the 'fundamental British value' of democracy, they explained that '*somebody can decide not to*

vote and can be fundamentally opposed to democracy for faith reasons, and that's fine, that's not going to be extremist'. However, '*if that leads to intolerance towards other people who are democratic or who are exercising their right to vote, and forcing your view on others through intolerant means, that's kind of the line*'. RC2 explained to university members that '*something that is racist, or xenophobic, or Islamophobic is not necessarily extremist*', but that '*dehumanising whole groups of people is when it steps over that line into extremism*'. In this way, they '*made clear in the training that social and political conservatism does not equate to extremism'*. RC2 made an effort to circumnavigate the problems associated with the identification of extremist views, as opposed to conservative views, by focusing on the less controversial issue of 'intolerance'.

3.3.2. Information sharing: internal and external referral structures

The training and advice provided by the RCs was also set up to ensure that universities have a system in place to share concerns internally and externally. Here, RC2 explained that universities commonly do so '*via their existing safeguarding structures*': prior to Prevent, most universities already had '*mechanisms in place that enabled staff and students to express concerns about individuals, and that always sat in the safeguarding area'*. In this way, universities are not necessarily expected to develop novel approaches, but to '*demonstrate that they have made their staff and students aware of how to raise a concern*'. The internal '*concern migration structures'* are important because *'you want to make sure that the Prevent referrals are relevant, and often people raise concerns, but the right individuals are able to establish quickly that the situation is in fact not related to Prevent at all'*. While *'not everybody in the university receives extensive Prevent training, they still don't want to discourage anyone from expressing concerns*'. The internal structures enable staff and students to do so without having to '*judge whether this is Prevent or not*'. In contrast, the '*designated staff, which are usually safeguarding professionals, people in student services or the academic registrar*' would then make an '*initial assessment, which would then potentially be put into a Channel panel'*. RC2 explained that '*as an institution they make a referral to a local authority or to the police to say "we've got concerns about this individual"*'. Subsequently '*they assess together if there is an issue or not, and if there is, then it probably will be going into the Channel panel, which also discusses the case with the university, and a Channel intervention could then be the result of it*'.

When I asked RC3 about the nature of their role in Channel referrals they told me that '*it depends. Often I'm involved. They may contact me for advice prior to making the referral to the police, and they will ask me what I think about a set of circumstances, and whether they should make a referral or not*'. They added that '*I will give some advice based on the concerns they have mentioned to me, but of course it's a matter for the university, they ultimately make that decision'*. Another way in which the RCs are involved is '*if a Channel referral is made, and then a Multi-Agency panel meeting is called*'. If

it is '*linked to a university staff member or student, then the Channel chair often asks me to participate*'. The extent to which RCs are involved in advising universities on potential Channel referrals '*often depends on the relationship with the university*'. However, while RC3 has '*a very good relationship with the ones under my supervision*', they added that '*often it depends on the facts*'. If they '*determine that it isn't time-critical, they often ask me and say "can I run a set of circumstances past you as a critical friend? Do you think we need to make a referral or not?"*'. However, '*if the circumstances are time-critical they will often just bring the referral directly to the local authority*'.

When I asked RC1 about issues related to consent and anonymity of the concerned individuals, they ensured me that '*when Prevent Leads ask me for advice, they don't use the individual's name. We keep it hypothetical as long as we can establish that it is not a Prevent concern*'. However, RC3 explained that this might not be the case when universities seek advice from the police '*because they could do some background checks to see if the university should refer that individual under Prevent*'. All RCs assured me that Channel interventions are based on consent. While RC2 said that '*the local authority could still provide support to the university, ensure that they are up-skilled and that there is awareness of the potential risk*', they added that '*in terms of the actual intervention, there is nothing we can do*' if an individual denies consent under Prevent. '*We obviously say to the institution to keep an eye on this individual, and if something else happens again, then we can try again*', however, '*it's not like we say: "right, you refused consent, so now we're going to pass this on to the police, or MI5 has to deal with it*"'. In a similar vein, RC1 emphasised that '*there is nothing mandatory about Channel*', and that '*it's up to them whether they then engage in that support process or not*'. However, if they don't '*we keep trying basically*', adding that the police '*would just keep knocking on their door and say: look this is the number. If you need any support, you know, we still believe you would benefit from this*'. At the same time, RC1 assured me that

> *it's not that we are monitoring that person, we are not doing surveillance*. [The police] *just regularly go*[es] *and knock*[s] *on doors of those who refused to engage or didn't want to take up or offer of support, as a better way of phrasing it.* [They] *would still ring them, knock on the door and just say, look, you know where we are.*

While it is clear that the police keeps information about individuals who were referred under Channel, including those who were unwilling to engage, none of the RCs were able or willing to reveal whether information about individuals who were either merely discussed as potential Channel cases, or who were not considered as in need of intervention, are still kept in police records.

Moreover, RC3 explained that '*while the Channel intervention itself is based on consent*', universities '*don't need any kind of consent to discuss, or to make a referral*' and that they '*would not advise any university to seek the consent of the individual before you make the referral*'. This implies that students, unless they are offered support through Channel intervention programmes, will not know that their details are shared with law enforcement agencies and when and whether that information is kept by the police. Under Prevent, individuals who did not commit criminal activities are not legally obliged to participate in any interventions; however, the interviews with the RCs suggest that they are exposed to soft power strategies aimed at coercing them into participation. The interviewees did not clarify whether the police retains information about non-criminal individuals, among them not only those deemed as eligible for interventions, but also those wrongly referred and individuals who were not referred but merely discussed as potential cases. The RCs' insights related to the nature of the information exchange between universities and law enforcement agents offers further evidence for the idea that the wide range of activities that are subsumed under the heading of 'safeguarding' under Prevent actually include security measures that are commonly only applied to individuals engaged in criminal activities.

The interviews further revealed that Channel referrals are not the only way in which universities are asked to share information about their students with the aim of safeguarding them. While the RCs revealed that universities benefited from their relationship by gaining insight into intelligence provided in the CTLP, and needed to identify and mitigate their own risks, they also revealed that under Prevent, universities are actively encouraged to feed into this process. RC1 admitted that a one-sided information sharing approach where universities are merely passive recipients of CTLP-related intelligence '*will always be flawed if we don't have the right people contributing to it*' adding that they '*need to know what universities are concerned about*'. RC1's acknowledgement that the police is dependent on universities' intelligence in order to produce an adequate risk profile somewhat contradicts RC2's claim that the police is not at all reliant on universities. On the contrary, RC1 found that '*what's actually happened on their* [universities'] *side*' should '*feed into that process*'. So in order to obtain information related to student vulnerabilities from the university sector, RC1 convinced the counter-terrorism police to establish Prevent links with university senior management, mainly because '*universities are not going to inform the CTLP unless they've got ownership of the product, or feel that they are brought into the process*'. RC1 '*managed to get all universities in the region invited to be part of the consultation process, when it's in the draft form*' adding that '*it's possible to feed in anything else they would like, that they feel that ought to be in there and then they get a copy of that document when it's published*'. This means that university members are now key individuals in the development of the CTLP. RC3 confirmed that '*universities can be very much involved in the drafting of the CTLPs*' and that '*most universities are invited and do participate*

in what's called CONTEST or Silver Group meetings, where they express their views on what is important in relation to the next CTLP'. Correspondingly, RC2 revealed that '*we, the coordinators, come in often, because we should be feeding into the CTLP, so we are reaching out to universities to ask them: what are the risks that you're finding?*'. Moreover, '*some local authorities as part of their CTLP creation might do a roundtable where they invite universities to ensure that they are feeding in*'.

RC3 explained that previously '*it was very much based on what the police knew, what the security services knew*', but by incorporating university members into the process '*the police are getting better at the production of those documents*'. They elaborated that '*the representative for the university would participate in the group meetings*' where they '*discuss last year's threat and risk. They will talk about the intelligence and how it impacts on them*'. Here, '*the analysts who produce the documents will ask for feedback from the university in relation to what concerns and issues their students have had*', which '*will be fed in*[to the CTLP] *to come up with a picture of what the targets and priorities are going to be in relation to the threats perceived by the partners*'.

While RC3 acknowledged that this form of intelligence exchange under Prevent '*is part of counter-terrorism, and part of how we respond to the security threat*', RC1 and RC2 both emphasised that sharing intelligence about student vulnerabilities should be primarily seen as part of universities' wider safeguarding approach. According to these two RCs, by sharing information as part of the CTLP, universities make sure that they receive the support they need to safeguard those individuals. In this way, universities are asked to assume a role as paternalised agents of security, who function as informants of security agencies by feeding the police with information about non-criminal activity that they otherwise would not be able to obtain. When I asked whether universities are willing to engage in the drafting of the CTLPs, RC3 explained that in their region, '*all universities are invited, and I can't comment on other universities outside my region, but if it mirrors my region then yes, they will*'.

At the same time RC3 suggested that the information exchange in the heart of the relationship between universities and external partners does not mainly take place during the CTLP draft meetings, because

> *the CTLP is only reviewed every six months, and then yearly… what you will find is that in practical terms, what would happen is from a partnership perspective, if universities had concerns about students, they would normally link in directly with myself or the local police. And then I would be able to share the intelligence.*

The RCs' accounts of the information sharing practices required under Prevent reinforced a conflation between safeguarding and security under Prevent: the RCs framed the information-

sharing practices described above as 'safeguarding' measures. However, their insights also revealed that the newly established relationships with law enforcement and intelligence agencies provide a means for universities to engage in traditional security measures of surveillance and intelligence exchange.

3.3.3. Minimising exposure to radicalising influences on campus: external speakers

The first policy area that is highlighted in the Prevent duty guidance for higher education institutions in England and Wales is 'External Speakers and Events'. Correspondingly, the RCs confirmed that all their universities' risk assessments addressed external speakers and events as potential risk sources. Interestingly, RC2 explained that when it comes to politically active universities which host many external speakers, the '*universities themselves would not necessarily think that they are high risk*', but RC2 themselves was '*mixed in terms of my own views*', mainly because '*just by the sheer amount of people that come through their doors, I think that's an area that needs a lot of focus*'. On the other hand, they simultaneously admitted that '*it's probably quite rare that an individual was going to be radicalised at an institution*' and that '*it's more likely that they are at the institution but that they've been radicalised elsewhere*'.

RC1 and RC3 confirmed that one of their major responsibilities is to advise universities on managing external speakers and events and agreed with RC2 that personally, they considered the risk of students being radicalised on campus via external speakers as lower than the risk of radicalisation in other venues. However, RC1 finds that '*we also have to face the reality and the evidence and that is that extremist speakers try to radicalise students*'. So even though RC1 questioned the extent to which such radicalisation attempts are successful, they still insisted that '*we have to make sure that universities have mechanisms in place to prevent that from happening*'. In a similar vein, RC3 affirmed that '*people forget that speaking at university premises is their* [the speakers'] *business and that a lot of these individuals speak all over the place*'. They explained that their role was to advise universities on how to '*vet speakers in relation to the potential risk they may pose to students and staff*'. Based on the understanding that extremist speakers often target several universities in succession, '*they can often do their due diligence by contacting their fellow universities and inquire whether they have considered a speaker as controversial*'.

At the same time, RC3 found that '*universities struggle with the online checking, the background checks*' because '*if you are a controversial speaker, you can apply to Google to have controversial behaviour deleted*' which '*gives a different picture of who they are*'. This in turn '*causes problems when university staff don't understand those things when they're doing their due diligence*'. For this reason, RC3 keeps '*a bank of records of where other universities have allowed a person to speak. So one university hosts that speaker, and they put these measures in place to allow the person to speak, so if somebody contacts me*

regarding a speaker', RC3 can give them advise on the basis of other universities' approaches. All RCs equally emphasised the importance of upholding freedom of speech. RC3's '*role in relation to this is to ensure that nobody is unjustly prevented from speaking*', adding that their role was solely to advise universities on appropriate measures to mitigate any risk posed by speakers: '*there might be a balance in the panel, so there's a counter-narrative. It could be recording the event. It could be managing who's allowed to attend those kinds of things, or to have stewards to assist universities*'. In a similar vein, RC1 emphasised that their role related to providing advice about controversial external speakers, with the aim of ensuring that '*those debates are healthier, because what we are saying is can we give that balance*'. They went on to elaborate, saying that

> *I've been in post for six and a half years and in that time I have not recommended that one event doesn't take place. Quite the opposite, and I've given advice and support that's allowed events that I don't think would have taken place to go ahead, because I ensured that there's been sufficient monitoring and mitigation of risk.*

Just like RC3, for RC1 '*Prevent is absolutely not about closing discussion, debate, dialogue. It's quite the opposite actually*'. They openly acknowledged the importance of free speech on campus: '*if we're not going to debate, discuss these things in universities, where else?*'. Rather than assuming a role in policing and censoring free speech, both of these RCs emphasised the positive contribution they had made, particularly in light of some universities' lack of expertise in ensuring balanced debate themselves. For example, when I asked RC3 whether they would, for example, allow somebody affiliated with the controversial CAGE organisation, led by former Guantanamo detainee Moazzam Begg, to speak on campus, they responded that '*I have advised universities to allow them to speak*'. Here, they explained that they advised universities which '*may say "we can't have them speaking at all"*', that '*you can't have a blanket ban on anybody. You need to understand who the individual is and what they're going to say. I think it really depends on the individual, and other than that CAGE is no different from any other potential controversial speaker organisation*'.

While RC3 noted that some universities were initially overzealous about shutting down debate under Prevent, RC2 noted a lack of balance at other universities: '*When I first came in I was finding that some universities were not able to provide that* [balanced debate] *at all. They were having a discussion run by a certain society on a Wednesday, by invitation only, all people associated with the same society and their views and idea' and that they were balancing this by saying "oh don't worry, next Tuesday, another society is having a debate or discussion that is from an opposing point of view*"'. In response to this '*nonsense*', RC1 was '*trying to encourage them to appropriately challenge certain views*' by making sure that '*things are put in place, a strong chair for example*'. They highlighted that '*ultimately what we*

are doing is we're producing different perspectives. Under Prevent universities have a responsibility, if they know somebody's listening to a particular point of view and will become entrenched in those quotes, can we offer a different perspective' while at the same time acknowledging and accepting that '*they might be still entrenched in a position*' after providing that balance of positions.

RC1 told me that '*in all my training sessions, I do a freedom of speech exercise where I present them with quotes and see whether they have concerns about them, and we talk through them*'. Here, they suggested that some universities seemed to have a much less liberal approach to controversial speakers, and that '*they're quite surprised when I say to them "well that's just opinion or commentary"*'. However, RC1 also explained that under Prevent, universities ought to stay vigilant about certain views that are expressed within the acceptable framework of free speech. Although an opinion or commentary may be legitimate '*that's not to say that there might not be a concern about whether or not that individual might move into something else. You know, maybe they are in the early stages, or perhaps listening to somebody who's trying to get them into violence and move them into extremism*'. However, in that '*we're not trying to criminalise them, we want to support them*'. Support in this space manifests itself in offering alternative perspectives: '*I am not saying that you can't say something that most people would disagree with, might find distasteful and unacceptable. What we are saying is that we'd like you to at least just have considered this, and come to an informed decision*'. So rather than preventing anyone from expressing controversial (but legal) views, they aim to encourage individuals to reflect whether '*the one who initially exposed you to that thought, and planted and fed that seed, deliberately kept them away from any other perspective*'.

Like RC1, RC3 strongly rejected the commonly expressed criticism that Prevent has a disempowering and chilling effect that provokes self-censorship. Not only did RC3 emphasise that Prevent is '*not the biggest attack on free speech*', they diverted from potential problems associated with the duty by pointing to the role of universities in curtailing free speech by stating that '*as far as I'm concerned it isn't Prevent, it's more no-platforming, people who say "I don't like your views because they are offensive. Therefore you can't speak"*'. This view is somewhat surprising, given the fact that the NUS provides no platform to a variety of extremist groups ranging from Hizb ut-Tahrir and the Muslim Public Affairs Committee to National Action, the British National Party and the English Defence League. There is much cause to assume that the No Platform policy and the Prevent Duty operate from a similar presupposition that students' emotional well-being constitutes a legitimate reason to prevent them from exposure to legal yet 'harmful' views. The only major difference between the two is related to who decides on who is allowed to speak: while no-platforming is a discretionary policy in the hands of student unions who do not hold the power to prescribe to autonomous universities whom to invite on campus, Prevent by law imposes on universities the responsibility to shield students from extremist views.

However, the RCs did not consider no-platforming as a policy grounded in similar assumptions to Prevent. Rather, they diverted any criticism around governmentally initiated restrictions on free speech by accusing universities of hypocrisy. Portraying universities as incapable of operating autonomously to provide balanced debate and to allow and to challenge controversial views, the RCs presented themselves as advocates of free speech, who, through training and advice, freed universities from self-censorship and one-sided debate. RC3 was particularly invested in emphasising that the controversial (and now removed), paragraph 11 of the Prevent duty guidance, which stated that universities have to cancel speakers if they cannot fully mitigate the risk, did in fact not impact negatively on free speech on campus at all. This was mainly because universities '*ignored it. It was nonsensical. You cannot mitigate all possible risks*'.

I have again found a double-sided element to the RC's discourse. On the one hand, they portrayed universities as overzealously shutting down controversial debate if left without guidance; on the other, they insisted that institutions were not negatively affected by the statutory guidance in any way. The interviews with the RCs revealed their genuine effort to counteract any chilling effect on free speech triggered by Prevent through advising and training universities to assume the most liberal approach possible. In that, they again disassociated themselves from contradictory official guidance and used their discretion to ensure that universities' on-the-ground enactment of Prevent prioritises their free speech obligations.

In this regard, it is notable that RC3 even took pains to insist that '*nobody has been refused speaking on the ground of Prevent currently in the United Kingdom*'. This statement seemed to contradict the OfS Prevent monitoring accountability and data returns 2017-18 report, which states that 52 speakers/events were denied because of Prevent. In response to this, RC2 explained that '*it's my understanding they were rejected due to persons/organisers refusing to comply with conditions imposed, or university diversity policies etc., rather than being refused on the actual grounds of Prevent*'. This statement confirms the difficulty associated with evaluating the impact of Prevent on free speech and external speaker events (see 1.2.5.1.). How universities navigate controversial external speakers on the ground, and how and whether the mitigations required under Prevent function to facilitate or to prevent events from proceeding will be explored in chapter 5.

3.3.4. Minimising exposure to radicalising influences online: IT policies

In accordance with the Prevent duty guidance, the RCs stressed the importance of having robust IT policies in place to adequately respond to the threat posed by online radicalisation. The statutory guidance maintains that universities are granted noticeable discretion in their decision on how and whether to shield students from extremist influences and from stopping them from committing crimes. In recognition that universities are not legally required to prevent anyone

from accessing extremist material, the statutory guidance merely declares that universities 'should consider the use of filters as part of their overall strategy' (para 27).

At the same time, the three RCs left no doubt that in their view, one of the most effective ways for universities to address vulnerabilities to radicalisation is through the control and surveillance of access to extremist material online. RC1, for example, while they acknowledged that universities are granted the discretion to decide whether they employ web filtering and blocking mechanisms, said that they aimed to ensure that '*universities consider the benefits*' of the proposed methods for their '*staff and students' wellbeing*'. They sought to ensure Prevent Leads that regulating access to extremist material, including blocking access to certain websites, does not stifle research, because '*if your sensitive research policies are robust, you will be able to grant exceptions for those who need to access such material in controlled environments*'. RC2 added that universities should '*face the fact that online radicalisation has become a serious concern*' and that '*universities can help to protect their students keeping an eye out for signs that they may be groomed online*'.

RC3 relied on even more forceful arguments to persuade universities to deploy blocking and monitoring of access to extremist material, drawing analogies between websites that feature extremist material and child pornography. They argued that '*universities are technically not obliged to prevent their students from committing crimes, from viewing indecent images of children. That's a crime, but universities don't have to stop them by monitoring their internet usage, or by filtering those sites*'. Despite this legislative state of affairs, they told university members that '*many still have those measures in place because of their duty of care*'. In their view, extending those measures to extremist material is '*the only logical thing to do*':

> *You have to give reason to a number of things. The example I always use is: if you had concerns that your students were involved in indecent images of children, or had access to children, what would you do? Would you make an effort to safeguard those individuals? And the answer is yes. I always pitch this argument.*

This statement again reveals that the attempt to frame online censorship and surveillance as a safeguarding measure conflates security and wellbeing concerns. RC3 did not relate their safeguarding mission in this scenario to the abused children featured on the online material, but rather to those 'in danger' of committing child abuse crimes. In this example, the students who accesses child pornography are clearly the predators, guilty of engaging in criminal activities. However, they are also framed as vulnerable and in need of protection from themselves. The universities' safeguarding mission lies in restricting access to indictable material to prevent their

soon-to-be criminal students from prosecution: '*once you have committed that crime, you lose your life. You're in prison, you don't have a career, etc.*'.

RC3 then applied that reasoning to the case of terrorist-related offences and iteratively declared that '*Prevent is now just another strand of safeguarding*', precisely because '*if you have a student or member of staff who is potentially going to commit a terrorist offence, because they'd been radicalised, would*[n't] *you want to safeguard them before they've passed that line to criminality?*'. We see here that when persuading universities to use monitoring and blocking under Prevent, RC3 again relied on a rhetoric that securitises vulnerabilities by emphasising the link between radicalisation and criminality, and simultaneously re-conceptualising the 'risky' or 'dangerous' individual as a victim without agency, in need of safeguarding and early protection. In this way, monitoring and restricting access to online material is not framed primarily as a security measure, but as a safeguarding method designed to protect individuals both from external exploitation and from the choice of engaging in criminal activities.

Subsequently, I asked the RCs whether more comprehensive approaches to monitoring access to extremist material would tighten universities' relationship with law enforcement and intelligence agencies. However, in this context they merely emphasised the benefits that universities gain from this relationship, evading the issue of the extent to which universities are functioning as sources for intelligence agencies: '*I've been able with my police colleagues to share some information with institutions around students that they ought to know, that help them managing and mitigating that risk*'. When I asked them about the nature of the information they receive in return, they replied '*what's happened is we've build those rapports, noticing the difference in terms of a general confidence that isn't sinister, as perhaps* [university members] *thought it might be. They know that people aren't trying to spy on* [*students*]*, but that* [Prevent practitioners] *are trying to protect and support people*'. But subsequently, RC1 admitted that

> *we've got to remember as well that we shouldn't sugar-coat this. We have a concern about an individual and we believe that this is Prevent. And then we establish as a result of deconflicting that, that actually the brother of that individual is a subject of interest or part of an operation or whatever. And it might be that that individual isn't suitable to being supported through Prevent. They could be Pursued.*

In this way, the interconnected nature of Prevent and Pursue provides an explanation for the conflation between safeguarding and security that lies in the heart of Prevent. While RC1 reiterated the potential danger stemming from the vulnerable individual and their milieu, they simultaneously insisted that '*we start from a position of presuming that that person may be subject to a*

radicalisation process or susceptible to a radicalisation purpose, and that means our priority is to support and protect them'.

3.4. The impact of institutional cultures on disparate levels of compliance and audience acceptance

Throughout the conversations, the RCs addressed a variety of significant differences among the universities under their supervision. According to RC3, universities' varying thresholds for compliance reflect the autonomy they are granted in their delivery of Prevent. As they put it '*until the OfS have the power to compel, we are always going to have this problem*'. RC3 explained that the '*myriad of approaches to how they comply with the duty*' is framed by the OfS's '*laissez-faire attitude to compliance because they can't compel universities*'. In turn, they observed that '*you can actually feel that the history of each university impacts their approach*'. They elaborated that '*some are really following it, they developed a variety of documents and they got really robust policies*', while others '*have taken the due regard point quite significantly. And so they are looking to do things to the bare minimum*', which '*is okay as long as they can justify it*'.

The three RCs particularly noticed differences between pre- and post-1992 universities. RC3 found that in contrast to the '*more diligent post-92 institutions*' the '*pre-92 universities, where academia is the focus, they do it in a different way*' which is because '*they tend to be more critical of Prevent*'. Here, they found that

> *there's a large body of academics who are completely anti-Prevent regardless of how you tell them: "well actually this is the real version of events, you need to listen to the evidence of student radicalisation". They have a view, and it's an ideological view that they're going to be anti-Prevent. And what has come from that is because the churn in relation to staff isn't as high as in colleges, that [view] sticks. And it becomes a cultural thing to be anti-Prevent if you are a member of staff at these institutions.*

The different institutional cultures seem to have a significant effect on the enactment of Prevent in several policy areas. For example, RC3 worked with '*universities who have gone through compulsory training for all staff*', as well as those which experienced difficulties associated with a negative attitude among staff members. In addition to training, '*the nature of external partners differs across the region'* with those critical of Prevent *'being more difficult with engagement*'. RC1 confirmed that when they '*reached out to universities, some would engage more than others: they straight away had the attitude that they would really like to avail themselves of that, and asked for me to deliver some training,*

while others were more hesitant'. They found that it '*depended quite a lot on the type of institution*', noting that '*the newer post-92 universities who were further education institutions at one point already had a more comprehensive safeguarding approach to their students*'. They explained that

> *in the further education space, they traditionally had a legal safeguarding responsibility. Call it safeguarding with a capital S. So because they had that background, it wasn't a big transition for them to pull them into this space and to make clear what we are trying to achieve under Prevent, they immediately understood and knew that they would have a safeguarding responsibility*.

In contrast, they found that some of the pre-92 institutions were not as '*happy to engage with it because they couldn't see how it sat with safeguarding*'. They '*were interested and you could see that they had a duty of care, but it really depended on who was actually in charge of Prevent within the institution. That dictated how engaged they were*'.

Overall, the RCs found that universities displayed different attitudes towards their duty under Prevent, with some highlighting their safeguarding responsibilities while others prioritised academic freedom and free speech, and the individual liberties of their staff and students. And while they found that a critical attitude towards Prevent contributed to some universities' effort to engage with their legal obligations to the bare minimum, the RCs also pointed to the importance of reputational considerations and universities' risk perceptions. For example, RC3 noted that '*universities' willingness to cooperate stems from agreeing with the risk. That might differ across universities: not everybody perceives of the risk in a similar way'.*

This variety became particularly evident in universities' approaches to managing their IT space under Prevent. In this policy area, universities were granted the biggest scope for discretion, and in turn, the RCs observed the most significant variations in compliance with regard to blocking and monitoring access to extremist material. RC3 explained that when it comes to blocking and monitoring access to extremist online material '*there's also a reputational risk for universities*' and '*that's what they make their judgement call on. Do they want whoever is using their IT to be able to commit a crime or not?*'. Here they observed that '*some universities have their view that if you do something, you've got the free will, you do that. And that's their position*'. In contrast '*other universities take a more protectionist view in relation to wanting to protect the reputation of the university and don't allow that. That's why they have filtering in place*'.

RC2 agreed that approaches to monitoring and blocking are '*mixed depending on the risk appetite for the university and the reputation they hold*'. RC1 noted that '*prestigious institutions have to worry less about reputational risks*', and in turn '*have a bigger risk appetite when it comes to allowing access to extremist material*'. They confirmed that some universities place a strong emphasis on

their institutional autonomy, stressing that '*the legislation doesn't say you have to do it. Because you have to consider that and you have to then be able to demonstrate and articulate the rationale for coming to whatever decision*'. They also explained that

> *again, I would break institutions down into different types. So if you're a Russell Group university, and you've got a very political academic staff and student body and so on, there was probably less appetite to actually put any form of filtering or monitoring in place. And as you work your way down to some of those who were traditionally in the further education area, there's probably more of an appetite where they think to themselves, it's about safeguarding those individuals. And actually we should just be safeguarding them by stopping them accessing this material.*

RC1's statement suggests that prestigious, research-intense pre-1992 institutions do not only host more critical staff members and students, but also display a higher risk appetite, which in turn translates into a more liberal approach to policy enactment. At the same time, the RCs also observed a transition from minimal engagement to more comprehensive approaches to compliance across the whole sector. For example, RC3 described compliance with Prevent as '*a moveable feast*', and explained that '*the appetite to allow that risk* [of online radicalisation] *to happen in the universities is reducing. The idea that we should maybe be doing more to protect staff and students is increasing*'. In their experience '*there is now just a small edge group of universities left who don't do filtering*'. In a similar vein, RC1 observed that

> *what changed was the Arena bombing in 2017, because virtually everybody knew somebody who was involved in some way in their community, at their institution. Perhaps they were at the event themselves, but also the fact that the perpetrator was a university student. Staff and students as well couldn't believe that that individual could get themselves into that space.*

They found that the attitudes of formerly critical and dismissive university members changed in light of their heightened risk perception:

> *The questions I got from academic staff in particular in my sessions changed from "is this spying? Is this information gathering? This is a step too far!" to "We agree. We need to do something. Can you assure us what you're doing in that space is going to be supportive, protective?".*

3.5. Conclusion

Overall, the interviews with the RCs suggest that audience acceptance with the securitising move varies greatly across the sector. RCs relied on persuasive strategies to achieve audience acceptance amongst university governance. While they were able to de-securitise education by reframing universities as allies and safeguards as opposed to breeding grounds for terror, their dual emphasis of students as 'at risk' and as 'the risk' exacerbated the securitisation of vulnerabilities. This in turn renders universities as paternalised agents of security who are expected to mitigate the risk of radicalisation by engaging in a variety of measures which are exclusively framed as safeguarding. Nonetheless, as part of their safeguarding function, they are encouraged to engage in information-sharing activities that are not merely aimed at safeguarding vulnerable individuals but also at ensuring national security through intelligence gathering and exchange with law enforcement agencies.

At the same time, the interviews reveal a genuine effort to disassociate Prevent from security practices, and show that RCs are sensitive to universities' responsibilities to uphold free speech and academic research. The RCs' accounts suggest that engaging in securitised safeguarding activities under Prevent may not be incompatible with universities' traditional academic missions.

Universities' responses to the RCs' efforts seem to vary, and different levels of audience acceptance translate into variations in the extent to which Prevent Leads engage in external partnerships and carry out Prevent training. While some universities' audience acceptance is reflected in comprehensive approaches to compliance, others aim for the bare minimum and refrain from all discretionary elements of the statutory guidance. Moreover, the interviews with the RCs suggest that factors associated with the cultural differences of universities, in particular between pre-92 and post-92 universities, shape their attitudes as well as their enactment of the Prevent duty on a policy level. Whether this means that at least some universities can be said to reject the securitising move will be explored in the subsequent chapters.

4. PREVENT BETWEEN SAFEGUARDING AND SECURITISATION

Chapter overview

This chapter explores the various factors that shape universities' compliance with and acceptance of Prevent. Drawing on universities' risk assessments, as well as the insights provided by Prevent Committee members, the first section explores how universities' threat perception shapes their attitude to, and compliance with, their responsibilities under Prevent. The second section relies on an analysis of universities' safeguarding policies and procedures, public policy statements, and interview data in order to explore how and whether universities' engagement with Prevent is shaped by their wider commitment to safeguarding the wellbeing of their members, and how they enact their safeguarding responsibilities on the ground. The chapter concludes with an analysis of universities' role in intelligence-sharing under Prevent. In particular, I examine my participants' threshold for reporting vulnerable individuals to law enforcement agencies and evaluate the extent to which the enactment of their safeguarding responsibilities has led to the use of security measures.

4.1. FACTORS THAT SHAPE UNIVERSITIES' ENGAGEMENT WITH PREVENT

As set out in §1.2, the thesis aims to address the reasons for the high levels of compliance with Prevent in the higher education sector, despite the fact that the duty has received so much criticism from university members. A review of universities' policy statements suggests that the prescriptive legal context that dictates compliance with the duty is an important factor for universities' engagement with Prevent.

For example, University H issued a policy statement declaring that Prevent is a 'legal obligation placed upon us'. University D emphasises that 'we are subject to legally-binding sector-specific Duty guidance'. Moreover, several universities introduce their measures under Prevent by referring to the legislation to which they are subject. They explain that the Counter-Terrorism and Security Act 2015 'creates a statutory duty' that they 'became subject to' (University A); 'places a statutory duty' upon them (University G); 'creates a statutory duty' (University J); 'imposes a new statutory duty' on them (University N); or 'places legal requirements on the university' (University I and Q). In a similar vein, University B avers that they are required to comply with their 'legal duties that came in force under the government's Prevent programme'.

My interviews with several members of university Prevent Committees confirmed that the legal framework of Prevent renders impossible the full rejection of the roles prescribed to

universities under the statutory guidance. For example, P.A explained that some members of their governing body who were particularly critical of Prevent '*were saying we should simply not obey the law*'. However, P.A acknowledged that '*if we'd broken the law, the charity commission would have been applied to remove members of the governing body. We're subject to the charity commission and they would never tolerate charities breaking rules. So we had all sorts of reasons, we had to obey the law*.'

In a similar vein, P.B1 told me that '*no matter what we think our responsibilities should be, there is a law that makes clear that we have to play our part in Prevent. If we don't, there will be legal sanctions*'. And '*although early on many academics and especially students pressured governance to boycott Prevent*', P.B1 acknowledged that '*that was never feasible*'. P.B2 added that '*we are a higher education institution, and there is a law, so we have to obey the law. So we have done what the law has told us to do. We take it very, very seriously*'. They told me that they explained this to their critical student body, in part by emphasising the university's 'protective' role as a buffer between students and the security apparatus of the state:

> *What we are doing is that we are complying with the law. It is not in the interest of the university to boycott this, because if we don't do what the law requires us to do, first of all the university gets in trouble for this, and secondly it very simply means that there is simply nothing between you and the security services. If we are not complying with the legal requirements around radicalisation, then it's going to put more scrutiny on students here.*

P.E explained that although they '*didn't have to worry that non-compliance immediately means we could lose university status*', and that '*this would be more of a central concern for newer and smaller higher education providers*', they were acutely aware that '*non-compliance can lead to a range of financial sanctions, and it also prolongs the whole process. All of those issues are time-consuming and the whole back and forth would have been very undesirable*'. P.F found that '*we don't really have a choice. We have clear obligations that we need to meet*'.

My participants also raised concerns that resistance could lead to reputational harm. For example, P.J found that '*universities have received a lot of negative media attention, they were accused of being complicit in radicalising their students*' and '*that of course can be really dangerous for the reputation of your university, and if you continue to make headlines because you are breaking the law, you can get into a lot of trouble*'. They explained that they had to comply with Prevent to protect the institution: '*As university governance it is our job to keep the institution out of exactly this sort of trouble*'.

Non-compliance with the legal framework of Prevent was mainly associated with administrative burdens and reputational harm, which in turn could lead to funding issues and a dwindling in the ability to attract students and economic resources. Consequently, universities

accepted that they had to engage with the legal requirements of the Prevent duty. But in this context, several participants highlighted that they were granted certain levels of discretion in the implementation of their statutory requirements. P.A explained that '*universities have to implement Prevent in a way that corresponds with their institutional context, and the risk they face*', and P.D confirmed that universities' discretion is predominantly tied to '*their risk exposure*', because they are '*expected to develop policies that are appropriate to the risk they face*'. In this context, the government requires all universities to carry out risk assessments and to indicate how that frames their engagement with the Prevent duty. The following section explores how universities' risk perception has shaped participants' acceptance of the Prevent duty.

4.2. The impact of universities' risk assessments on their engagement with Prevent

4.2.1. Universities' risk profiles: a document analysis

Drawing on an analysis of universities' documentation of their risk assessments and risk perceptions, this section sheds light into the risk profiles of the seventeen universities under investigation. The following analysis primarily seeks to explore the nature of the risks that universities consider as part of their Prevent risk assessments, and whether their approach mimics the guidance provided by the government and their RCs. In turn, I explore whether the risk assessments reveal different levels of audience acceptance.

Out of the seventeen universities only Universities A, C, G and P provided sufficient information to identify their risk profiles. Universities C and G identified 'a low risk of extremist activity at the university'. University G's risk assessment reports that 'the University maintains close links with Prevent partners' in order to 'keep appraised of the regional context within which Prevent-related risks to the university population need to be addressed'. They continue 'to judge that the greatest threat to our students would arise from external actors seeking to influence lonely or isolated students'. In this way, the university reveals that they do not perceive of their students as 'the risk'. Moreover, their low risk perception results from gaining insight into 'the Counter Terrorism Local Profile', which 'suggest[s] that the main risks' relate 'to issues or actors that are not likely to exert such influence' on members of their university.

University A's internal review states that they have a '*very* low risk of having staff or students drawn into terrorism' (my emphasis). While it remains unclear why University A's risk is perceived as lower than that of University C and G, the university relates that this 'was originally stated by the police and security services'. In this way, University A confirms that they relied on their relationships with external partners to develop their internal risk assessment in consideration of the risk profile of their locality.

University P equally identified a 'very low risk'. They explained that they consulted 'their regional HE Prevent Coordinator' to discuss relevant risk and consequent mitigations. University P further disclosed that 'the overwhelming emphasis from the Regional Coordinator is on Islamist terrorism, including the grooming of young women and families to depart for ISIS territory in the Middle East'. But interestingly, University P's high risk location did not lead them to assume a high risk perception in relation to their institution. Documentation provided by the city council shows that University P is located on the outskirts of a Prevent priority area, and the university revealed that because 'Prevent risk assessments may take any form at the discretion of the institution', theirs 'includes a prefatory characterisation of this institution to underscore the very low risk associated and the proportionate and reasonable action as a result'. Here we find evidence that University P came to a judgement about their low internal risk primarily on the basis of their institutional characteristics, and not on the ground of the threat level in their wider locale. Although the University did not make their risk assessment document available, I was able to further explore the institutional factors that shape their low risk during the interview with P.P (see §4.4.2.2 below).

None of the other universities' documents confirmed whether they consider themselves as high or low risk. University K acknowledges that their risk assessment should be 'specific to the institution, its location, and its context' and informed by external partnerships that allow for 'insight into the risk pervasive in the area'. Although they do not reveal whether their local risk of radicalisation is judged to be high or low, they learned that far right extremist groups pose the major risk in the area.

University O equally acknowledged its responsibility to 'assess the context of their local institution' in order to 'assess the risk associated with people being drawn into terrorism'. However, their risk assessment does not address the nature of the local risk. Rather, it focuses on the institutional policy, or 'activity areas', that the statutory guidance highlights as potential platform for radicalising exposure.

In line with the Prevent duty guidance, University M reiterates that the risk of extremist radicalisation 'may vary greatly and can change rapidly', and while they do not declare whether their institution is exposed to high or low risks, they again mimic the government's understanding that 'no area within the institution is entirely risk free'. Consequently, University M's risk assessment 'follows the themed risk categories outlined within the HEFCE Monitoring Framework for the Higher Education Sector'. This approach is mirrored by the Universities I, and J whose risk assessments focus primarily on the policy areas in which they seek to mitigate the risk of radicalisation.

University H emphasised their high level of awareness of the local threat posed by radicalising influences. Their risk assessment highlights that 'current changes to the external environment/community' may 'affect individual risk areas' in their institution. In this context the risk assessment highlights that the university engages in 'regular dialogue with the DfE Regional Prevent Coordinator and OfS Prevent Adviser', and notes that the university is 'in receipt of the Counter Terrorism Local Profile from the DfE Regional Coordinator'. This confirms that University H's internal risk assessment seeks to address the external threats to their institution. The risk assessments shows that University H did not only focus on policy areas that are prone to be targeted by extremists to radicalise their students. They also addressed the risk of compliance failure, as well as the risks associated with overcompliance. Here, they acknowledged that the 'over-extension of the reach of Prevent', could lead to 'overzealous reporting', 'damage to reputation and credibility', and 'impact on academic freedom', and in turn should be addressed as part of their wider response to Prevent. This is significant, because it reveals that although the university accepts their responsibility to mitigate the (in their case low) risk of radicalisation on their campus, they do not consider the mitigations themselves as completely risk-free.

While University B's risk assessment acknowledges the risk associated with the failure to identify an individual 'who goes on to commit a terrorist attack' and with events and speakers 'that carry the risk of radicalisation', like University H, they also focus on the risks associated with the Prevent duty itself. They find that the failure 'to discharge duties under the Counter-Terrorism and Security Act 2015' is not primarily a 'moderate risk' because it renders the university vulnerable to extremist exploitation, but rather because compliance failure could lead to 'directions or mandatory order imposed by the Home Secretary'. In addition, they acknowledge that the Prevent duty itself harbours a high risk to 'elicit opposition' from students and staff in the university's community, 'who regard [the university administration] as spying'. In turn, they point to the high risk of 'damaging trust'. In addition, they find that Prevent brings about the moderate risk that 'academic staff invite opprobrium by over-zealous implementation'.

Here again we have the interesting case of a university that not only considers possible radicalisation processes as a potential risk, but also considers the Prevent duty itself as carrying risks. In this way, the risk assessment reflects the university's critical attitude towards Prevent, and may be read as a sign of (at least partial) rejection of the securitising move of the state. Although the university accepts the possibility that their students may be radicalised and commit terrorist related offences, they do not seem to agree fully that the measures required under Prevent are adequate means to mitigate those risks.

4.2.2. Universities' risk perceptions and their implications for compliance

This section will show that interviews with all my university participants confirmed that their risk profiles were evaluated with consideration of how the local threat posed by extremist activity relates to their internal characteristics. In particular, they considered how vulnerable their students are to radicalisation by external extremist groups and individuals, and whether factors associated with their size and location exacerbate or mitigate the risk of radicalisation. The interviews confirmed that the institutional diversity of the seventeen universities is reflected in different threat perceptions and risk profiles. Moreover, the interviews revealed that the perceived risk of radicalisation on campus has informed participants' attitudes to, and engagement with the Prevent duty.

3.1.1.1. Low external threat, low internal risk

In the cases of Universities A, C, G, H, I , L, K and M, my participants declared that the local threat was perceived as low, and also confirmed that their university is considered to be at low risk of radicalisation by the OfS. P.C explained that '*having been involved in the Counter-Terrorism Local Profile for many years now*', they had learned that '*in our local area, the risk is still relatively low, especially compared to other areas*' and that '*the big threat in the wider area is far right extremism. That's where the risk lies because we are in a very kind of white, poor area*'. However, they did not consider this threat to translate into a heightened risk of radicalisation, in particular because '*our student body doesn't reflect… the local demography'.* Instead, '*the issue for us is around international students being more likely to be at the wrong end of some abuse* [or] *violence from people who are inspired by right wing ideologies*'.

With regard to the institution's internal risk profile, P.C revealed that '*we've been told that we are a low risk organisation*' and although P.C's '*understanding is that there is some kind of risk rating held*', the OfS did not inform them about the factors that shape their risk rating. Instead, P.C explained their low risk on the ground of their size, location, and the 'lack of diversity' in their local environment and their student body: '*I would imagine it's related to our geographical location, and the makeup of our local population. We're located in a small city, and the institution is very small and not very diverse*'. Although the participant did not specify what they meant by 'diverse', they acknowledged that the university differs from '*universities in places like Manchester or Bradford*'. While they avoided pointing out that both cities belong to those with the highest Muslim population in England, it seems likely that their understanding of 'diversity' is directly related to an institution's or city's Muslim population. They explained that in the case of universities in Manchester and Bradford '*there is a much bigger population that is drawn from all over the country, all over the world*', and correspondingly '*the cities' universities reflect their wider population. They are very*

diverse'. In this way, the term 'diversity' seems to be used as a means to convey their appreciation of the high risk associated with the Muslim population without explicitly suggesting that a high make up of Muslim students could contribute to a higher risk profile.

P.C explained that they had a positive attitude towards Prevent because of the potential to address future risks pre-emptively. While '*there are very senior people at this university who don't believe we should be engaged, my view is that we can't function as a university if we don't engage*'. They explained that '*only because the risk might not be particularly prominent at your institution at a given time doesn't mean that universities shouldn't be aware of the ways to deal with any future issues. There is a lot we can do, and we have previously been involved in community cohesion projects*'. In this way '*Prevent is not something that you do reactively because you realise that your students are at risk. You do it preventatively. That is in the heart of the concept*'.

Interestingly, P.A had a very different opinion about the merit of engaging with Prevent. They explained that '*by far the majority of academics had a visceral feeling that Prevent was the kind of securitisation process – a political securitisation process – that they felt the university shouldn't have any part in*', and that '*university governance was equally critical of the Prevent*'. They revealed that their low risk status enabled them to '*resist Prevent*' in a way '*that other universities which were identified as high risk would probably not get away with*'. P.A also explained that the '*very low risk*' of their institution was related to a variety of institutionally specific factors: '*Our students get a lot of contact time, which means that they are well known by academics*' and that '*most of our students live in university accommodation, which again means that we are well placed to notice if they experience any problems*'. In this way 'knowing our students' served as a factor that contributed to the low risk internally.

In addition, P.A noted that '*we have not observed any extremist activity in the past, so we don't think that our students are very susceptible to radicalising influences*'. In this way, the low external threat converged with the low internal threat to shape the university's 'very low' risk perception. University A's very low risk meant that '*we could engage with Prevent in a way that existing rights would be left more or less untouched. It will be done on a lower level, with the overarching rights continuing in place*'. They highlighted that '*since we are at low risk, and we are expected to take a risk-based approach, we were actually able to engage in a way that meant that we are barely compliant with the duty*'. Their low risk status meant that

> *the OfS has accepted our approach, even if we are deliberately not focusing on behaviours we should be considering in this rubric. While our approach is exclusively designed to respond to illegal behaviour, Prevent really is about the pre-crime space, and that's what our policy doesn't acknowledge, that's where we don't want to play a part.*

P.A shed light into the high levels of rejection of any securitising elements of the duty in their University. They admitted that '*the purpose of Prevent is probably genuinely trying to just pick up students who might be going off the rails. I don't think the public policy purpose is to turn universities into a tool of national security*'. However, they also found that '*the effects might be that universities are drawn into a national security apparatus*' and that the problem with Prevent '*as a national security program is that it might challenge at some stage down the line the autonomy of universities*'. But P.A also acknowledged that '*the absence of a perceived risk*' opens up the possibility to be '*more critical and to be rejecting of Prevent. I would imagine that high risk universities are compelled to take a very different approach than we do*'.

P.M explained that '*according to the OfS, we are low risk. We just had the feedback that confirms that we are low risk and that we are unlikely to have any issues with respect to Prevent*'. They explained that '*we have insight into the CTLP*', and that '*we use this to inform the risk assessment to make sure that we understand what the potential risks are within the area. So from my point of view, it's an integral piece of data that we reference on a regular basis*'. In this context, they revealed that '*the biggest risk within the area is that there is an active far right. But that's about it. The majority of the other things picked up by the police and the CTSA*' are considered '*predominantly as low risks*'. They explained that their institutional '*risk profile is very low*' because '*we don't have a very high threat exposure*'. In addition, they explained the OfS' evaluation of the university as 'low risk' on the grounds that '*the level of engagement by staff and the student body has been very high and there's generally a level of openness and engagement across the whole community, and that works well*'.

In this way, P.M confirms the RCs' view that the OfS risk rating is influenced by universities' levels of compliance with Prevent (see §3.2 above). However, P.M made a very similar statement to that of P.C: they acknowledged that '*institutionally, we are quite fortunate here. We don't have that demographic of universities in say Sheffield or Bradford or other areas that potentially give rise to a higher risk profile*'. While P.M was comfortable in acknowledging the risk posed by right wing extremism, they seemed more hesitant to point out directly the threat posed by Islamic extremism. Nevertheless, they showed that in their understanding, institutions that are in closest contact with Muslim populations are at the highest risk of radicalisation. While University A perceived their low risk status as an opportunity to justify their lack of engagement with the duty, University M's low risk shaped their '*general attitude to the Prevent duty within the University*', in that '*it's not really a major issue for us*'. P.M explained that because '*we've not experienced any significant issues surrounding Prevent, or terrorism or ideology*', the Prevent duty has '*been accepted*'. For P.M, the low threat perception meant that '*we could be very clear about holding and maintaining academic freedom and freedom of speech within the university*' and that '*our implementation of Prevent didn't really have a huge impact on our daily activities*'.

P.N1, whose university is located in close proximity to University A, confirmed their low external threat and internal risk. They also shared the view that '*the OfS ratings have always been a bit of a mystery*' as '*all we ever received back is the statement that we in their view do not represent a risk*'. However, they received more precise '*information from the CTLP, shared as part of the safer community partnership*' and their '*Regional Coordinators share something similar with us*'. This information '*feeds into our assessment of potential risks*'. At the same time, University N's '*risk register*' does not '*have a risk rating about how vulnerable we feel to having a radicalisation problem at the university*'. They explained that their '*risk assessment does not feature facts like student demography and so on… because this is where you potentially play into some of the stereotypes of what Prevent is designed to do*'. Instead, their risk assessment '*is more about the implementation of the duty, and more about the risks for compliance failure. Do we have appropriate links with the police and RCs? Do we have enough staff trained? Things like that*'. P.N1 noted that while their neighbour University A '*was really rejecting*' of Prevent, members of University N '*have never been proactively against Prevent'*. Especially in light of their low risk, P.N1 found that '*the implementation of the duty didn't pose any significant challenges for us, we didn't see it as a central issue here*'.

P.G1 declared that '*we are not in a high risk area. We've got two campuses and they aren't high risk*'. P.G2 explained that they were able to gain nuanced insight into the local threat (or rather the lack thereof) from their external partners, but they also emphasised the highly sensitive nature of such information: As a member of the '*local Prevent delivery board*', P.G2 was able to gain '*a lot of insight into very confidential information about the national context and the local context*' from '*information services and the police*'. In addition they received information about the local context from their RCs and from '*two other contacts within the special branch*'.

While P.A and P.C explained that their low risk was informed both by the low local threat level and a consideration of the low internal risk, P.G1 did not specifically evaluate the risk of radicalisation on their campus: '*the low external risk meant that we did not have to go back and evaluate in how far anything applies to us*'. Like University N, they '*just reviewed the policy areas outlined in the guidance, with the knowledge in mind that we are not high risk*'. P.G1 explained that '*although we had voluntary arrangements under Prevent since 2005, we thought of the Prevent duty as applied to the higher education sector in 2015 as very controversial'*. They '*were primarily concerned that there was a too rigid framework, because once you get a legislation in, it has a risk of being compliance and tick-box driven. And we wanted to avoid that*'. Being a low risk institution '*greatly helped us, because it makes it easier for us to respond to the duty*'. This statement is interesting because although it suggests that the University is genuinely supportive of the aims of Prevent, they were also critical of the means by which the government envisaged universities to deliver their duty. Like University A, they relied on their low risk to justify their 'low key approach' to implementing Prevent.

P.H informed me that '*in terms of like Islamist extremism … there is a very, very low risk in the area*', and that '*the local risk tends to be far right*'. However, they also found that this risk is generally low, and particularly in relation to their university: '*on campus we haven't got any specific issues with right wing radicalisation at the moment*'. Rather, they found that '*we do have quite a lot of agricultural space around us, and as a university we work with farms and we do agriculture programmes*'. In turn, they said that their '*sort of big risk as a university really is the animal rights side of things*'. And while '*this is the type of issue of which we are more mindful*', they also added that '*it is not a very serious risk, nothing to be particularly concerned about with regard to Prevent*'. They explained that their low risk was predominantly shaped by the lack of external threats, especially when '*compared to say, universities in London*', which '*would have a very different risk profile that they would be looking at*'.

P.H also found that Prevent did not constitute a major issue for the university '*because we were already doing a lot of what we needed to do for Prevent, we just weren't branding it specifically as Prevent*'. Interestingly, P.H also maintained that '*what is legally required and what is not isn't very clear anyway. I don't think that is the driving motivator for most universities to implement the duty. You have this guidance, and you implement certain aspects because you believe that they might be fruitful in your institutional context*'. Although the hard power strategies that are employed by the government through linking the Prevent duty and its statutory guidance to the CTSA limit the scope of universities' resistance, P.H's comments revealed that universities' policy enactment is not necessarily informed by a nuanced understanding of what components of the duty are legally binding. In light of the legal ambiguities of the policy, universities' approach to policy enactment is informed by factors that go beyond legal prescriptions.

In line with P.H, P.I confirmed that '*our concerns are not so much about the University, but about the city*' and explained that they have to evaluate the extent to which the local risk applies to their own campus. And while P.I found that '*we are not a high risk area*', they were also conscious that '*there are some areas of concern because we do have a diverse population*', which means that '*there are some concerns about Islamic extremism and concerns about white nationalism and English nationalism*'. However, P.I found that the low risk identified in the area does not apply to their institution because '*the actual percentage of students from the city and the surrounding areas is quite low, therefore the profile of the institution is not directly comparable to the profile of the local area*'.

Although P.I earlier maintained that their engagement with Prevent was dictated by their legal obligations, like P.H, they also admitted that '*there are certain things we would do anyway. We had external speaker policies long before Prevent came along, and we had longstanding links with the police before Prevent came along*'. However, their low risk meant that '*we could justify that what we did before was sufficient to meet our legal requirements. We were already well-positioned because a lot of the stuff we were doing already*'. They explained that '*we want to comply with Prevent to the best of our abilities, but*

also in a moderate, measured and appropriate way', and '*being a low risk university allows us to continue with what we would do anyway, instead of introducing any sort of heavy handed measures*'.

P.L said that their university is located in '*a low risk environment*' and that this '*risk assessment is stable, it doesn't change a great deal*'. The major threat '*around actual radicalisation is recognised to be low, medium to low, across all the domains*', and relates to '*the extreme right, rather than Al Qaida-inspired*' extremism. P.L stated that '*our risk assessment reflects the low risk that is identified locally, it is overseen by the partnership group and it also indicated updates from the CTLP, regional and local forums, as well as general updates from the police*'. Although P.L emphasised that they '*don't have a profile of a student that we're concerned about generally*', they also said that their heightened awareness of potential vulnerabilities is informed by the local issues associated with socio-economic deprivation and a low risk of right wing radicalisation. For example, they '*found ourselves supporting white individuals from poorer neighbourhoods in poor parts of the area*', and especially those '*with a kind of social communications disorder, autistic spectrum disorder*'. In this context they '*think isolation is probably one of the biggest factors, something that we intuitively understand as being a risk factor, when individuals are not connecting with the student population*'. P.L clarified that '*obviously the nature of isolation is that you can't see the people who are isolated. So we only know of people who are isolated when they are in contact with our support services, and that's why I would say they have a disability, because these are the ones we know about*'. In turn, they identified their main internal risk as associated with the failure to identify isolated students that could be vulnerable to being radicalised '*from talking to people online*'.

Interestingly, P.L suggested an acute awareness of the threat of extremism, despite their acknowledgement that their local area and institution were considered low risk. They explained that

> *only because we did not have any serious issues here does not mean that this will never happen. None of the universities whose students went to try or actually commit terrorist offences saw that coming. Being a low risk university of course helps take the pressure off our staff, but that doesn't mean that we shouldn't be any less compliant than any other university, regardless of the current risk. That can change any minute.*

This insight is particularly interesting: while other participants relied on their low risk profile to either justify non-engagement or minimal engagement with Prevent, P.L did not consider their low risk as relevant to their approach at all. Like P.C, they revealed high levels of acceptance with their responsibility to pre-empt any risk that could potentially arise in the future, and thus seems to have fully accepted universities' responsibilities under Prevent.

P.K held a very different view. As University L's neighbour, they confirmed the low risk related to right wing radicalisation. However, P.K also found that this risk does not specifically relate to their students who '*if anything are quite left wing*'. In this way, they perceive the likelihood that they are vulnerable to right wing radicalisation as particularly low. While both P.K and P.L considered their risk of extremist activity as low, P.K saw this as an opportunity to '*take some time and think about how we want to deliver Prevent. We were low risk from the very beginning, so we felt that we have the time to take a step back and reconsider how we want to position ourselves*'. While they were not explicitly opposed to Prevent, they '*were also aware of the problems associated with the duty, and we were eager to respond in a way that would ensure that we only do what we have to do in light of our low risk*'.

3.1.1.2. High external threat, low internal risk

While the above universities emphasised the low risk of extremist activity in their local area as well as their low internal risk, Universities B, F, J, and P suggested that they consider themselves as internally 'low risk' despite being located in high risk areas. When P.P discussed their risk perception, they said that in their understanding the OfS '*have got fixed measures*' to assess whether a university is considered high risk or low risk and confirmed that this is prominently informed by the size and location of the institution. As they put it, '*London, Birmingham, big urban universities in areas where there have already been a number of Prevent cases are usually considered as higher risk*'. They noted that '*in our area, there is a big university in the city centre, and it's a diverse city, plus it has got a very big student population*', which means that this university '*is considered as at high risk*'. And although '*we technically belong to an area that is generally considered as high risk*', P.P found that the external threat '*does not really apply to us*'. They elaborated that University P is '*on the edge of the city*', which means that '*our risk is lower than theirs*'. Regardless of the high threat level in the area, they also found that their institutional characteristics functioned as protective factors that rendered the university 'low risk': '*we are about the size of a big school and we have a Catholic foundation which to some extent has made us less likely to be diverse*'. Like P.C, P.D identified the lack of 'diversity' in their student body as a factor that renders their university as at lower risk than others, which was '*confirmed by the OfS, who said that we are low risk*'.

For University P, being at low risk meant that '*Prevent wasn't a big deal for us. I mean, I took it seriously, I wanted to ensure that we were compliant. But as I was saying, we are not high risk, so let's not spend a lot of time and money on this*'. P.P revealed that the university was accepting of the Prevent duty overall, and that their major concern was related to '*the bureaucratic burdens associated with compliance*'. Their low risk '*meant that we really weren't obliged to make a lot of changes to our usual operations*'.

Like University P, University B finds itself in a 'high risk' environment, while at the same time considering itself as at low risk of extremist activity. Although P.B1 acknowledged that universities in their area '*generally receive more attention under Prevent because of their high risk environment*', they explained that '*we perceive ourselves as a low risk university*', which is mainly related to the fact that '*we mostly have mature students and we are a small institution*'. P.B1 also confirmed P.P's observation that the '*risk of radicalisation is likely to be lower at universities whose student body is less religious, less culturally diverse*'.

P.B1's consideration of the makeup of their student body constituted one of the main factors that informed their low risk perception despite the high threat identified in their area: '*As a university, one of the main things you've got to look at is the demographics, where are your students coming from? What are their home experiences like?*'. Here, P.B1 also noted that the status of universities, their prestige and ranking impact on their overall risk profile, because it allows them to be selective, which in turn means that they accommodate students they consider as particularly resilient: '*We are really getting the top hand of the students who apply to come here. We've got more of a choice than other universities*'. In turn, prestigious universities have '*a different risk profile*' because their '*students come from different backgrounds. They are privileged. They've got a lot more to lose. So I think there is less of an ontological* [sic] *crisis that you may see with some of the other, less selective universities*'.

P.B2 echoed these comments, confirming that their low risk is related to the low level of student vulnerability that they perceive on their campus: '*we have young people for whom their world is their oyster. And if they want to change the world they won't need violence. And they are ambitious and driven. They are well educated and quite progressive*'. In this context, they highlighted that they consider their Muslim students as at low risk of radicalisation because of the liberal culture of their Islamic society. They found that '*if we had an individual who was liable to extremist views, the best weapon we have against that is the rest of the Muslim students. They are going to challenge that and create a culture that religious Muslim students want to be part of. One that is faithful and not violent*'. In this way, P.B2 acknowledged the possible threat posed by extremist Islamism, but also highlighted that this risk does not specifically relate to their institutional context: '*we know that radicalisation is taking place within sections of the Muslim community, locally, in Britain and around the world*', but '*we also know that does not apply to the students that we have here*'.

By highlighting the reasons for their low risk, P.P, P.B1 and P.B2 revealed the factors that could make institutions be deemed as *high* risk. In particular, they revealed that 'diversity' constitutes a potential risk factor, especially in light of the regional threat, which mainly seems to be Islamist radicalisation. The interviews showed that religious and underprivileged Muslim students with low levels of education are perceived as contributing to a high risk profile. The

participants did not specifically frame those students as posing a risk in themselves, but implied that such students lack protective factors associated with educational and socio-economic opportunities, in turn making them most vulnerable to radicalisation.

University B's risk assessment suggested that the university acknowledges the threat posed by extremism, but it also indicated that they reject the proposed measures to mitigate the risk under Prevent (see §4.2.1.3 above). P.B2 confirmed this: '*there is a realism that there is a threat, a recognition that there is a less pressing threat here at the university, but then also a recognition that Prevent is a very blunt instrument to try and solve it. I think that sums up where we are here*'. In fact, University B had several disagreements with their regulator, who did not seem to agree with University B's internal evaluation and risk assessment: '*there was quite a lot of back and forth with HEFCE at that time, because they weren't too happy about our initial response. They thought we were being too light touch*'. Consequently, the University '*had to have another go to make sure that they* [HEFECE] *were happy with what we were doing and the way we were measuring it*'. P.B2 explained that the major issue lay in '*our standpoint, our attitude. They were concerned that we hadn't thought through enough and that we were being too light touch and needed just to sort of be a bit more interventionist*'.

University B is an interesting example of a case where the university's internal risk evaluation and their associated light touch approach did not correlate with their regulator's risk estimation and their expected engagement. At the same time, the discussion with HEFCE at that time did not intimidate members of University B whose approach continued to be informed by their critical attitude and low risk perception:

> *We were very driven by the mistakes of other Prevent implementations. We didn't want to be trigger-happy and we didn't want to alienate our students. The last thing we want to be seen as is oppressing them because of the potential problems of a tiny minority, because that's not a healthy way to make people learn.*

This statement is particularly important, because it suggests that P.B2 is genuinely rejecting of the thought that radicalisation constitutes an ubiquitous threat that they have to anticipate and mitigate pre-emptively through compliance with Prevent. In this way, University B's initial attitude can be understood as a direct rejection of the securitising move. The case of University B strongly resembles that of University A, in that both of them are highly prestigious institutions with a privileged student demography that informed their low risk perception. In turn, they saw themselves as being in a position to challenge the government on Prevent. While University A's low local risk meant that they were able to go unchallenged, University B's disagreement with the OfS risk evaluation caused more friction. However, like University A, University B insisted

on their critical and almost non-compliant engagement with Prevent, which they felt entitled to because of their institutional standing:

> *We have a lot of specialists and we are a very prestigious institution that can stand up to the monitoring bodies and say, well, I don't think we're going to implement it in your way because we believe that would have damaging implications. We don't experience the same compliance pressure than other, newer universities without that sort of reputation*. (P.B2)

P.B1 added that:

> *the freedom, the autonomy, the possibility to take time and make a decision, the autonomy to first say no, then engage in a discussion and haggle in a way over policies with the monitoring authorities, that freedom is reserved for the prestigious universities, because of their sector. University A and B can always say to the OfS, 'we are University A/B, what are you going to do about it? Look at the revenue we are generating, look at our international standing'. And they've got a point and it makes them quite difficult to argue against, because they are such a big player. So as long as we can demonstrate that we operate broadly within the rules, I don't think the OfS will be able to do anything.*

This link between university prestige and capacity to resist securitisation will become particularly important when we come to examine universities' approaches to freedom of speech under Prevent in §5.2.1.

Moving on to University F, P.F explained that although their campus is located in a Prevent priority area, their '*risk is much smaller than that of other universities in the city*', because '*it is much smaller, which means that the students here are known much more*', and because the makeup of their student body is different: '*it's predominantly Chinese students who are not religious. We don't have requirements for prayer room facilities here, and there are no particular right wing issues either. It's just a different demographic*'. In this way, University F's student body, '*which is not particularly involved with political nor religious ideologies*', serves as a protective factor that renders the institution as low risk despite their high risk environment.

P.J confirmed that this could be a significant factor. As a small campus in close proximity to University F, University J is well aware '*that the risk in the area is relatively high*'. They explained that they '*have links with the police and the RC and I get the CTLP so I understand what the risks are for the institution*'. Although they acknowledged that '*there is an increased awareness of right wing extremism*', they were also clear that '*the main issue here remains Islamic extremism*'. At the same time,

like University F, they found that '*despite being in a high risk area, we are low risk*', because '*our students don't really reflect the local risk*'. They explained that '*most of our students are internationals and they usually don't have ties to local communities*', which accounts for the fact that the university does not consider the risk of radicalisation as high on their campus. Like P.P, P.F and P.J confirmed that their low risk profile allowed them to respond to Prevent in a less comprehensive way than high risk universities. Their universities' main aim was to achieve compliance in the most efficient way, and P.J declared that '*we don't have to spend that much time on it. If we were at higher risk, we would probably have to be more attentive to making sure that every single person on campus understands their duties and knows what to do, and we would probably have to engage the student union more*'.

3.1.1.3. High external threat, high internal risk

In contrast to the universities considered in the previous section, there were some universities which combined a perception of a high external threat with that of a high internal risk. University O, located in the same city as Universities F and J, found that their local threat level has a significant impact on their internal risk assessment. At first, they were very hesitant to share with me information about whether their institution is considered as 'at high risk' by the OfS, because they found such information to be potentially security sensitive. As P.O put it, '*I don't think universities should reveal their risk levels, because you don't want to give extremists the information they need to decide which institution to target*'. They also explained that this relates to both high and low risk universities, '*because low risk universities might not pay as much attention* [to extremist influences] *and it may be easier to infiltrate them*', while being a '*high risk university means that the students there may be particularly susceptible to radicalisation*'. Accordingly, P.O held the opinion that '*it is not really in the public interest to know about each university's risk profile; if anything, it could become a security issue*'.

However, without providing any information about the local threat level, P.O revealed that '*we do get a lot of information about problems in the communities here, and we are able to then evaluate the relevance to our own students*'. They explained that for them, '*information about the local threat is important*', because '*we have a lot of young students who come from nearby, and it is not uncommon that they are living with their families while they study. Our university is an important hub for our local area*'. In this way, P.O suggested that their institution's risk profile is strongly connected to that of their local environment. P.O even confirmed that the '*risk profile of an institution like University B is different*'; however, they were careful not to draw out any factors that could profile particular groups. Rather, they confirmed that '*privilege and opportunities*' are important resilience factors, which in turn can shape an institution's overall risk profile.

P.O also confirmed that '*our risk assessment does not rely on estimations of our students' vulnerabilities or ties to local communities*'. Rather, they focused '*on areas that we can use to minimise radicalising exposure and to identify concerns as early as possible*'. For them, their institution's high risk limited the possibility of any critical engagement with the duty: '*while there are universities whose first response is to dissect every word of the guidance and find problems with it, we didn't feel that that was an appropriate reaction in our context. We knew that there would be increased attention on our institution, and we had every reason to try and follow the guidance as closely as possible, to minimise the risk exposure on our campus*'. In this way, P.O echoed P.B1's observation that universities' scope for resistance is shaped by their institutional characteristics, which in turn shape their risk profile. Low risk universities seem to be better placed to adopt a critical perspective on the threat posed by extremists, and the risks this creates for their own students. These institutions find it easier to challenge and reject the securitising move of the government.

The relationship between a high risk perception and a positive attitude towards Prevent was further confirmed by P.Q, whose institution is '*located in a Prevent priority area, which means that the risk of extremist activity is perceived as higher in this region*'. They remained vague about the specific threat picture in the locale: '*we do get insight into the CTLP, but it is a restricted document, so I can't really share the specifics with you. But what I can tell you is that the CTLP looks at all forms of threats, so it's not only about Islamist extremism, but also about far right activities*'. They also explained that '*for our risk assessment, it does not really matter where the threat is coming from; it's mostly about being aware of any activity going on in the area to make sure that we don't let that have an effect on our campus*'. They did not explicitly declare that their university is considered as at high risk, but they also did not highlight their low risk.

As opposed to P.P, P.B1, P.B2, P.F, and P.J – who all emphasised that a high external risk had no relation to their institution – P.Q acknowledged that '*we ultimately have to think of ways to protect our students from radicalising influences, especially when we learn of cases where groups or individuals are trying to target our student community*'. In this way, they saw the likelihood that one of their students may be exploited by extremist influencers as much more likely than P.P, P.B1, P.B2, P.F and P.J: P.Q explained that

> *it would be dangerous to assume that our students would not be targeted by extremists, or that all of them knew how to handle situations in which others try to influence them. They are young, and we have a complex student demographic, which means that a lot of students have experienced hardships. They are not as confident and empowered as the public school kids who got picked by the golden triangle.*

P.Q believed that members of their university '*had a sense of realism regarding the threat posed by extremists. Nobody was denying the possibility that they could target our students. So overall Prevent was really relevant*'. And although '*colleagues were critical of some elements of the duty,* [and] *there was a sort of academic scepticism around Prevent*', nobody essentially '*challenged the fact that students might be radicalised and that we have a role in stopping that from happening*'. Here we see that audience acceptance of the existential threat posed by extremism, and agreement with the RC's understanding of student vulnerability, led to an accepting attitude towards Prevent.

As opposed to most other participants, P.D was particularly open about the high emphasis on the threat posed by Islamic extremists under Prevent. They explained that

> *around the time of the implementation of the legislation, I went to a Prevent meeting and the head of the Office for Security and Counter-Terrorism was talking. And the first thing he said was 'let's not beat about the bush. This is about Islamic extremism'. They were quite honest about that.*

P.D found that while right wing radicalisation had become an increasing focus of Prevent, their '*university community is relatively self-cleansing when it comes to the right wing*' because '*it's left of centre generally, and it tends to be very intolerant of even mildly right wing views*'. They emphasised that their institutional context required increased attention on the potential threats of Islamic extremism '*because the student population is just a subset of the broader population*'. As opposed to '*University K, with a largely white middle class student population*', University D '*is embedded in a Tier 1 Prevent Priority area, and has a multi-ethnic student population*'. In turn '*you assess your risk according to your location, your student demography, and your size, because that determines how well you know your students*'.

Consequently, P.D found that '*part of my assessment is what Prevent referrals look like in the area. They are largely male. We had a feeling of the age demographic involved, the* [prevalence of] *mental health* [problems] *figures strongly. So you can start make an assessment of your student population in the context of the referral data*'. They went on to explain '*if all referrals in your area are middle-aged Somali women, then we haven't got many of those at the university*', which would lead to a low internal risk. In this instance P.D purposefully chose characteristics that do not apply to their students, yet their previous information about the external threats and referral data made clear that the main group of concern consists of Muslim males; in turn, the university's risk assessment is informed by the prevalence of this group at their institution. Indeed, P.D reiterated that '*you can't isolate the university from the community within which it lives, because we make up big parts of the city*'. They explained that their awareness of the relevance of the high external threat to their institution's student demography shaped their primary response to Prevent. For them, the high risk awareness meant that they already carried out informal risk assessments and prepared action plans to raise

staff members' awareness of their students' vulnerabilities long before Prevent became a legal requirement. Having

> *approached Prevent pragmatically initially, the legal requirement was then kind of overlaid over what we were* [already] *doing. I basically had done the risk assessment in my head way ahead. So when it came to the legislation, all I had to do was to create the risk assessment, formalise what was going around in my head really. It wasn't much of a challenge*.

In this way, '*it was easy to provide evidence for risk assessments, training, and so on*'.

However, while P.D's heightened threat perception shaped their positive attitude towards Prevent, they also found that their colleagues initially did not share the same understanding of the local and internal risks. They went on to say that their colleagues only came to accept the Prevent duty when they too developed a heightened awareness that the external local threats actually pose an imminent risk to their students. After P.D and their colleagues learned that one of their students joined ISIS, their colleagues attitudes changed from disinterest and rejection to active engagement with Prevent: '*Suddenly it was no longer somebody else's problem. One of our students has gone to fight*'. This incident was followed by the Arena bombing in 2017, and '*the fact that a student was the perpetrator just really changed the attitude of a lot of colleagues*'. Similar to the case of University O, the heightened awareness of the threat of Islamist radicalisation and the risk this posed to students strongly shaped Prevent committee members' acceptance of the duty.

P.E was initially particularly hesitant to reveal any detailed information about their local and internal risk. Prior research enabled me to identify that the University is located in a Prevent priority area. When I noted this, P.E confirmed it and emphasised that '*because of our location in the UK and because of our regional picture we are at risk from right extremism,* [just] *as we are from Islamic extremism*'. Their '*risk assessment takes into account what the situation is regionally, where there might be perceived threats*'. For example, they would ask: '*are there groups that are targeting the universities, who are those groups, how do they operate?*'. P.E explained that it is '*important to understand those things, and then to look at policies and procedures to ensure compliance*'.

When I subsequently asked P.E whether the high local threat level translated into a high internal risk, they evaded the question and explained that '*there is a difference between the local profile and our policy response in that we wouldn't target groups. Our policies would be in place across the student population*'. And although P.E had earlier revealed that the '*local threat relates to both right wing and Islamic extremism*', they reiterated that '*in terms of understanding the local profile, right wing is definitely a concern*'. While '*it's less of an issue on campus and more in the city*', it is '*something that we are very aware of because of our location within the city*'. P.E also explained that an increased

emphasis on the threat stemming from right wing radicalisation has shaped the attitude of key members at their institution: '*it tends to bring with it a different set of responses. When you start talking about right wing radicalisation people feel less that it's an anti-Muslim thing*'.

Such statements are particularly interesting, because they show that universities' attitudes to and engagement with Prevent is not merely shaped by an appreciation of the general threat level, but also by the nature of the threat. For University E, an increased focus on right wing radicalisation has led to a more positive attitude towards and acceptance of Prevent, because it meant that '*we weren't targeting any particular form of radicalisation*'. In turn, the University's awareness of the high external threat, as well as an acknowledgement of their legal obligations, has led to '*a very pragmatic approach: we look at what we need to do to meet our statutory requirement*'.

4.2.3. Conclusion

The analysis of universities' risk assessments has confirmed that universities' engagement is not merely informed by their legal prescriptions. Rather, they have different risk perceptions, which are informed by the local threat level and the internal risk of extremist activities. In several cases these factors have shaped universities' compliance with Prevent. The interviews revealed that the internal risk perception is strongly related to student demography, where factors associated with lack of diversity, socio-economic advantage, privilege and high educational attainments of students are perceived as protective factors that contribute to institutions' low risk perception. The data also suggests that some of the participants with low risk perceptions were more critical and rejecting of Prevent, while those who perceive a high external risk and/or the idea of high student vulnerability are more positive about their legal duties. Several participants revealed that their acceptance (or rejection) of the securitising move is strongly shaped by the converging factors of institutional prestige and risk perception, which means that some participants were better positioned to reject Prevent than others.

However, some participants' attitudes did not seem to be strongly related to their risk perception. While some associated a low risk with less work and easier compliance with the duty, they did not challenge their responsibilities under Prevent. In fact, some participants highlighted that they already carried out Prevent-related activities before they were legally required to do so, which suggests that the legal prescriptions do not constitute the only reason for universities' compliance with Prevent. Indeed, it appears that some participants' engagement with Prevent rests on their genuine acceptance of the duty and their conviction of its effectiveness. In this context, the RCs already suggested that an increased focus on Prevent's safeguarding dimension has achieved heightened audience acceptance among university members. The following section

explores universities' understanding of their safeguarding responsibilities under Prevent in more depth.

4.3. Compliance and the culture of care: Mitigating the risk of radicalisation through safeguarding

4.3.1. Reframing Prevent

My interviews confirmed the RCs' view that several university members involved in administering Prevent have actively helped to reframe the duty as a safeguarding concern, and that this in turn has shaped compliance across the sector more broadly. For example, P.B2, who discussed the high levels of resistance to Prevent in their institution, disclosed that their Prevent Committee decided early on to pressure the government to change the language of Prevent, which they perceived as too policing:

> *We were very clear about not wanting to be part of the security services of the state. And we said that early on. That was actually a useful thing, we emphasised that within our functions and our responsibilities, we can provide students with support. And we also emphasised that this is what should be the focus of the duty in our sector.*

Similarly, P.D told me that they were able to shape their RC's understanding of Prevent as a welfare mechanism because of their early involvement with Prevent:

> *In 2011, there was money available from the government around Prevent. It was not distributed on any risk basis – universities could simply apply for the funding and easily got it. So we applied in order to train counsellors and chaplains, and subsequently I sat on two local Steering Groups. Following my involvement there, I was asked to sit on the recruitment panel for the new Regional Coordinators. So the manifestation of our relationships was in 2014, when we developed an action plan around training to spot vulnerabilities and to provide support. I always made clear that it has to be a safeguarding approach.*

P.D found that highlighting Prevent's commitment to safeguarding was particularly important because '*Channel referrals are at least in the best case scenario based on consent. And if students don't see that it is about welfare and support, then the referral will be very alienating*'.

P.G2 took the view that

at one point both sides were pushing against open doors arguing that Prevent must be a safeguarding or welfare matter. I was consulting the government on this actually, and equally, I convened with other Prevent Leads from universities in the area, so at one point, this was just where consensus was reached, that if we have to implement it, we will see it as part of our welfare approach. And actually, that was exactly the view of HEFCE and the DfE at that time.

For P.G, understanding Prevent as a safeguarding approach corresponded with their University's institutional values, in that '*from the start we weren't sort of demonising our students, we weren't seeing the main risk within our own students. We saw the main risk always as being from outsiders trying to influence our students. The safeguarding issue.*'

The Prevent duty's increased focus on safeguarding strongly shaped University N's engagement. P.N1 explained that '*we weren't proactively doing anything before it was the law; but then quickly moved into compliance*'. This was mainly because they agreed with the strong emphasis on safeguarding vulnerable students:

we were not only doing it because it's the law but because there was a sense that we have possibilities of helping vulnerable individuals under Prevent. And actually, yes, we know we've got a legal obligation, but we can get behind the concept of supporting people that may be vulnerable. And yes, we would consider potentially being drawn into terrorism in the same way we would consider somebody potentially being drawn into drugs or into county lines. Those people need help and we will be there to support them.

This confirms that the re-framing of Prevent as a welfare rather than a security issue seems to have occurred in dialogue between state agencies and (some) universities, where the latter's criticism and consultation provided insights into the arguments and views that promised to lead to higher levels of acceptance across the sector. Some universities' emphasis on their roles and responsibilities as carers of their vulnerable students has been adapted as the main rationale for RCs to request compliance across the wider sector. As we shall see in the next section, several universities' policy statements and safeguarding policy documents confirmed that they connected Prevent to their safeguarding mission. Moreover, the documentation of universities' safeguarding and wellbeing procedures of all seventeen universities reveal that they have integrated Prevent into their existing approaches to safeguarding.

4.3.2. Safeguarding under Prevent

While University C's public-facing website does not explicitly state that Prevent itself is a safeguarding measure, it does note that the institution is 'committed to safeguarding the welfare of its students and staff *and* to meeting its duties under the CTSA 2015 and the UK government's associated Prevent strategy' (my emphasis). Other universities also made it particularly clear that they consider Prevent as an integral part of their safeguarding commitments. For example, University G's public-facing website states that they consider the Prevent duty 'mainly in the context of our safeguarding duty of care' policy framework, and University N maintains that 'the University's approach to Prevent is primarily one of safeguarding the welfare of students and staff'. In a similar vein, University Q declares that 'the University takes a proactive, safeguarding-focused approach to implementing our Prevent duty'. University I's guidance on how to identify and respond to 'students in difficulties' professes that 'preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalisation has for some time formed part of the University's approach to safeguarding its students'. It goes on to emphasise the University's 'approach of delivering the Prevent duty as part of these welfare and safeguarding activities' in response to the CTSA 2015. University B's guidance on dealing with safeguarding concerns highlights their 'obligation to identify and help individuals to avoid becoming drawn into committing or supporting terrorist acts (in other words being radicalised)', which is 'therefore a form of safeguarding'. University H has 'embedded the Prevent agenda within the safeguarding structure', because they 'understand that radicalisation may also lead to significant harm and abuse'. The University explicitly 'recognises that welfare and Prevent can go hand in hand'.

In a similar vein, University D finds that 'teaching a child or young person extremist views and radicalisation is a form of child abuse', which in turn links their duty under Prevent to their broader safeguarding commitment. And while University O's policy acknowledges their 'statutory duty in relation to *both* Safeguarding *and* Prevent' (my emphasis) – suggesting that they draw a distinction between them – they also explicitly consider 'the risk of someone being drawn into terrorism (radicalisation) as a risk of harm or exploitation'. In this way, the University makes clear how Prevent relates to their broader safeguarding responsibility, which now 'includes radicalisation'. University P's guide on the Prevent duty states that 'in common with many other institutions, the University regards the Prevent duty as a safeguarding issue; that is, an issue of ideological grooming'. Consequently 'the procedure on safeguarding against ideological grooming' constitutes 'the principal operational response to the Prevent Duty'.

Likewise, Universities E and F's safeguarding policy document includes a section that specifically deals with concerns about radicalisation. It states that 'the duty to protect children, young people, and vulnerable adults from harm extends to protecting them from involvement

in groups which set out to radicalise individuals'. They explain that in practice this means that they are 'required to have in place appropriate pastoral and welfare support and clear referral routes to external services such as the Channel programme'. University M's risk assessment states that they seek to ensure that individuals have 'an understanding or awareness of the safeguarding policies and arrangements', and defines 'safeguarding' as 'the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity'.

The insights provided by the above universities seem to support the findings of the previous chapter in relation to RCs: Prevent has found acceptance among universities not only because they were forced to comply, but also because they were genuinely able to relate their duties under Prevent to their wider culture of care for their students and staff. The document review of universities' safeguarding policies and procedures outlined in this section further confirms that they have all integrated Prevent as part of their existing structures that are designed to identify a wide range of safeguarding concerns.

4.3.3. Defining and identifying vulnerability to radicalisation

In this section, I will provide an analysis of universities' safeguarding policies and procedures, as well as information about their approach to staff training. We will find that universities are not equally accepting of the government's definition of extremism, and of the recommended training materials prescribed to identify cases of radicalisation.

For example, University A's internal review disclosed that the University rejected the Home Office's training material because of their problems with the government's vague definition of extremism, which includes 'vocal or active opposition to fundamental values, which is clearly far to sweeping and cannot be accepted literally'. In turn, they found that 'additional training on "how to spot terrorist views" or how to spot somebody who is being drawn toward terrorist sympathies' would 'run serious risk of the training being ridiculed'. Instead of the mandated WRAP training, the University chose to focus on 'Equality and Diversity Briefings' and on 'Implicit bias in the workplace' training.

University B's cause for concern guidance defines radicalisation as 'the process by which a person comes to support terrorism and forms of violent extremism leading to terrorism', and explains that in their institution, they 'aim to prevent people from being drawn into terrorism by identifying the early-non criminal signs of radicalisation in individuals and helping them to avoid moving into active support for, or commission of terrorism'. Like University A , they also rejected the official training material because they 'have not found anything suitable for use

within the University community'. They equally focus on 'unconscious bias training' as opposed to training that focusses on how to identify radicalisation.

University M relies on an understanding of extremism as 'the vocal or active opposition to inclusive values, such as democracy, the rule of law, individual liberty and mutual respect and tolerance for different faiths and beliefs', in effect rejecting the government's emphasis on 'British values'. Adapting a definition of extremism that differs from the official guidance could be read as a direct rejection or criticism of the government's approach to the Prevent duty. At the same time, the University accepts the official emphasis on non-violent activities: while University B's definition of radicalisation focuses primarily on 'violent extremism', University M defines radicalisation as 'the process by which a person comes to support terrorism and *all forms* of extremism leading to terrorism' (my emphasis). Whether their rejection of the government's emphasis on fundamental British values has led them to rely on alternative training material remains unclear. While University M's refusal of the government's emphasis on fundamental British values may initially suggest a wider rejection of the prescribed training material, they also highlight that 'the University will seek to make staff aware of how the government understands the term "extremism" and the relationship between extremism and terrorism', which provides some evidence for a state-centric approach to training.

University H relies on an even broader understanding of radicalisation than University M. In their view, radicalisation is 'a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideas and aspirations that reject or undermine the status quo or undermine contemporary ideas and expressions of the nation'. The University seeks to emphasise their high level of acceptance of their responsibilities under Prevent by pledging to 'follow the Prevent strategy and intervene early to protect and divert people away from the risk they face before illegality occurs'. In particular, they seek to 'protect vulnerable individuals' by challenging 'ideology that supports radicalisation'.

In a similar vein, University L maintains that their understanding of extremism is in line with the government's definition of 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. In turn, University L understands radicalisation as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'. As opposed to Universities A and B, University L relies on the government-prescribed WRAP training material to ensure their staff 'have an understanding of the types of behaviours that may provoke cause for concern about the student's general welfare' and 'the risk factors in relation to radicalisation and specific behaviours that may indicate cause for concern in this area'. The University's policy document highlights that all members of staff should consider whether

certain behaviours may hint that a student is in the process of radicalisation. These include 'changing style of dress or personal appearance', 'day-to-day behaviour becoming increasingly centred around extremist ideology, group or cause', 'loss of interest in other friends and activities not associated with the extremist ideology, group or cause', the 'possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)', 'attempts to recruit others to the group/cause/ideology', and 'communications with others that suggest identification with a group/cause/ideology'.

University O's safeguarding policy notes that their institution's newly appointed Local Safeguarding Officers 'are required to undergo Prevent training'. The University also states that their secretary and assistant secretary 'are accredited as WRAP trainers, allowing access to Home Office Prevent training material'. Like University L, University O's safeguarding policy document highlights a range of factors that should be viewed as 'potential signs' or 'risk factors' of radicalisation, which range from 'expressed support for violence and terrorism', 'increasingly sympathetic views to terrorist acts', 'expression of extreme political or radical views' to 'change of appearance', 'dramatic change of friends', 'spending excessive time alone', and 'notable changes in behaviour and mood'. In addition, the University considered the 'possession of violent extremist literature' and 'attempts to access or contribute to violent websites', as well as the possession of 'material regarding weapons and/or explosives' and of 'literature regarding military training, skills and techniques' as potential signs of radicalisation. The policy furthermore notes that claims of involvement in 'organisations espousing violent extremist ideology' and in 'combat activity on behalf of violent extremist groups' and 'claims of attendance at training camps' constitute signs of radicalisation.

University P's procedure on safeguarding against ideological grooming 'responds to heightened political and public concern about individuals' vulnerability to being drawn into extremism, both violent and non-violent, sometimes termed radicalisation', and University K highlights that 'possessing views one way or another may not be illegal'. However, 'a Prevent-related concern would be raised when those views are extreme and inciting violence/support for violence'.

Universities E and F also reveal high levels of acceptance regarding their responsibilities under Prevent. They acknowledge that 'universities have been identified within the government's Prevent Strategy as potential sites of radicalisation'. Including this as part of their policy documents suggests that they have accepted the controversial narrative that universities are potential security threats, and that the process of radicalisation is seen as something that may happen *because* of individuals' exposure to such sites of radicalisation. In this way, universities are framed as a potential threat. In addition, the document suggests that the University has

accepted the securitising narratives of the state because it agrees with the RCs' understanding of the high levels of vulnerability pervasive in university communities as a whole. As it puts it, 'whilst children, young people and vulnerable adults may be most at risk of radicalisation, students and staff who do not fall into these categories may also be at risk'.

The universities discussed above show a wide range of different understandings of radicalisation and extremism, which in turn suggests different levels of audience acceptance. Some universities seem to have adopted a state-centric approach to defining extremism and radicalisation, relying on the government-approved training material. In contrast, other universities rely on different understandings of radicalisation and extremism and do not consider the governmental training material as appropriate for their situation.

4.3.4. Reporting signs of radicalisation internally

The previous subsection uncovered that universities rely on various definitions of radicalisation and extremism, as well as on different training resources to identify Prevent related concerns. However, the safeguarding-related documents also brought to light a similarity in the way universities across the sector integrate Prevent into a wider safeguarding approach, by using internal structures that were previously developed to report a variety of concerns related to general wellbeing (see Appendix B, Table 4.3.4)

University A's internal review states that 'local staff such as welfare officers (…) will encourage students to seek help from the welfare service', and 'encourages staff to seek help from the human resource office' where 'there may be concerns raised that a student or a member of staff may be at risk of being drawn into terrorism'. The document explains that this approach 'integrates concerns about the development of extremist attitudes into the broader approach to the welfare and well-being of students and staff'. University D's website advises people who 'have concerns that a student or colleague is vulnerable and at risk of being drawn into terrorism' to 'contact the University's Prevent Lead'. These approaches are mirrored by most other universities which either refer to their Prevent Lead or to their appointed designated safeguarding officers in the student welfare and HR departments as points of contact to share Prevent-related concerns (see Table 4.3.4). University B's safeguarding policy adds that 'as with other types of safeguarding, the threshold for reporting to our designated officer for consideration through our documented process is low', because 'Prevent is concerned with early intervention to safeguard and divert people away from the risk they face'.

Although Universities E and F highlighted various behavioural changes as indicators of radicalisation, they also acknowledge that they may be rooted in other welfare-related reasons, which 'is why a safeguarding approach should be adopted' in the first place. University O adopts

the same viewpoint, noting that 'it is widely acknowledged that radicalised individuals come from a wide range of backgrounds and are often described as demographically unremarkable', and in turn that 'caution needs to be emphasised when considering a potential concern about radicalisation', because 'many signs can equally well be brought about by other life circumstances'.

Universities E, F, and O emphasise that members 'should not make referrals for Channel intervention to other authorities' themselves. These universities also rely on policy formulations that highlight that concerns should initially be dealt with internally. In the first instance, staff and students who are 'concerned that a peer or colleague is being radicalised' are encouraged to 'discuss these concerns with the individual directly if possible'. Universities E, F and O's policies add that 'the conversation should be held in an open and non-confrontational manner stating the reasons that the individual is concerned about the other person becoming radicalised'. Alternatively, concerns may be raised with senior members in academic departments or the designated safeguarding contact.

University C's website directs concerned individuals to their 'safeguarding against radicalisation flowchart', which does not differ from their general reporting mechanisms to address broader safeguarding concerns internally. The website informs its audience of the procedures they have in place to respond to concerns that are related to the radicalisation of individuals. The public-facing website directly addresses their audience by urging them not to ignore their concerns about individuals, especially if they have 'noticed a change in behaviour', for example because a person is becoming withdrawn or acts differently, or said something worrisome. Here, the University highlights that 'staff in front-line support roles will often be the first to notice if a student experiences difficulties; or colleagues if the person is a member of staff', and advises them to 'check with others that may have noticed something' or to 'speak to the person directly' to 'see if they share your concern'.

In a similar vein, University I emphasises that concerns 'that a student may be at risk of radicalisation' should 'be treated in the same manner as any other welfare case'. In what seems to be an effort to avoid overzealous and misinformed information sharing with external agencies, they insist that 'the requirements of the Prevent duty are on the institution, not the individual', and that they 'are not expecting' staff members or students 'to make decisions about individuals without support'. University P declares that 'as with other safeguarding concerns, the mantra should be: Notice, Check and Share', and advises staff not to 'overlook comments or behaviours which give pause for thought, whether directly observed or reported to them by students'. Like University C, they suggest that staff should in the first instance aim to achieve a better overview of the situation, by 'using common sense, if necessary by talking to identified students, or if

possible, corroborating online material or asking for documentary material'. Like University I, University P reminds their staff and students that 'our statutory duty does not require us to act in any covert way and that it is entirely normal at any stage in this strand of safeguarding to be openly discussed with identified students/staff'.

This section uncovered that universities are using their pre-existing safeguarding structures to escalate concerns about radicalisation internally. The documents suggest that Prevent-related concerns are internally treated as any other concerns, and that universities did not restructure their usual approach to dealing with welfare issues as a result of Prevent. This implies the possibility that universities did not move out of the sphere of 'what are perceived to be normal university politics' (Gearon, 2017, p. 4) , at least not with regard to their safeguarding and wellbeing approach. However, as §4.3.5 will show, universities approaches to dealing with Prevent as a safeguarding concern are not confined to internal reporting mechanisms.

4.3.5. Reporting signs of radicalisation externally

The consulted documents also revealed that universities did not merely integrate Prevent into existing safeguarding structures, but that they have expanded those structures to allow sharing of Prevent-related concerns externally (see Table 4.3.5) . For example, concerns may be shared with 'the relevant authorities' (University A), 'external sources of help' (University B), their 'Regional Coordinator and the police to discuss potential Channel referrals' (University C), the local 'Safeguarding Co-ordinator' (University E and F), 'statutory partners' which include 'the police and the local community' and 'key Prevent partners' (University H), 'the Counter Terrorism Unit and OfS' (University J), 'partner agencies' (University L), and 'a Channel Panel' (University N).

Universities I and M's policies do not provide any details about how concerns in relation to Prevent are escalated. In these cases it is impossible to evaluate how the universities have integrated Prevent into existing structures and how such structures are altered to accommodate the possibility of sharing concerns externally.

In contrast, some universities provide more information about their external referral procedures. For example, University A's internal review states that 'there have been no concerns that have reached as far as involving the university welfare services let alone triggering reference to bodies outside the university'. In a similar vein, University O's briefing document for university governance on Prevent disclosed that up to date of composition, 'two concerns were escalated' internally, 'but required no further action'.

University G provides additional details about the nature of the information exchange about radicalisation concerns, explaining that the Prevent Lead 'may consult informally with a

Coordinator from Channel about the general circumstances of the case but without at that stage making a formal referral to the Channel process or divulging the identity of the individual who is at risk of being drawn into extremism'. This suggests that the University seeks to ensure that individuals are not wrongfully referred to Channel, a reading that is further supported by the University's statement that 'any formal referral of a vulnerable individual who is at risk of being drawn into extremism would be made only if there was a judgement that University processes were inadequate'. University K's documentation outlines a similar process. It 'will assess the specific details of the concern highlighted', and 'if the concern is a Prevent issue, convene a University Prevent assessment panel' to conduct further evaluation. If 'the panel agrees that the concerns are in relation to the Prevent duty, the individual and concerns identified will be referred to the Prevent regional coordinator'. Like University D, University K confirms that 'this can be done with anonymous details, so that the individual's name is not confirmed to any external partners unless and until the concern is confirmed as a Prevent case'. The University also emphasises that 'if the RC confirms that the concerns raised are in relation to the Prevent duty', they will 'confirm whether consent should be sought from the individual for a referral via the Channel programme'.

Also similar is the approach of University L, which finds that 'in some instances it may be necessary and proportionate to share some personal information with partner agencies as part of the risk assessment and referral process'. The policy further states that 'information sharing will be assessed on a case by case basis', and that the University will take 'into consideration the necessity and proportionality of sharing the information', also considering 'whether it is possible to obtain consent for the information to be shared'.

Interestingly, University P holds a stronger view on the necessity of consent form the referred party. They state that 'subsequent actions will have to be discussed with the student/member of staff concerned' and that 'their consent is required for referrals to other agencies'. The document outlines that 'it is envisaged that a student will be invited to openly discuss the identified matters with the designated safeguarding officer in a pastoral non-disciplinary matter', and that 'no individual can be referred to Channel without their agreement and no individual can be compelled to take part'. This approach differs in an important way from that of University K, which merely considers consent for a Channel referral as 'desirable', but not a necessity.

4.3.6. The conflation of safeguarding and security

The information provided by the universities as part of their public statements and Prevent-related policy documents suggest that they have widely accepted the safeguarding dimension of

Prevent. At the same time, several statements seem to suggest that not all universities consider students merely as 'at risk'. Rather, they again suggest that under Prevent, students are increasingly viewed as 'the (potential) risk':

University J's risk assessment reveals that the University 'has an information sharing protocol with the police in order to facilitate effective sharing of information about vulnerable people'. In this context, the University explains that they 'may need to share personal information about staff and students', to ensure 'that a person at risk of radicalisation is given appropriate support', for example 'via the Channel programme'. However, 'the consent of the person concerned will be obtained before sharing any information about them'. The University further insists that 'personal information will only be shared where it is strictly necessary to the intended outcome and proportionate to it', and that they 'key to determining the necessity and proportionality of sharing information will be the professional judgement of the risk to an individual or the public'. This is particularly interesting because it reflects a dual perception of the concerned person as both at risk, and as a potential threat to others.

University K explains that while consent is only required for the participation in de-radicalisation programmes and not for the Channel referral itself, 'consent will always be preferred'. However, they maintain that 'if speaking to the individual would be detrimental to the safety of the individual or others', or would likely 'push them into proactive extremist activity', they may re-consider obtaining consent. In this way, the individual of concern is not merely framed as a vulnerable victim in need of safeguarding, but also as sitting at the tipping edge of criminality, and as a potential threat to others. Consequently, the external referral cannot merely be seen as a safeguarding intervention, but also as a way of minimising the security threat stemming from the vulnerable individual.

Equally, University G's guidance on Prevent-related concerns highlights the possibility of 'exceptional circumstances', which include 'cases where there might be a risk of immediate harm to an individual or a third party', which in turn would allow university members other than the Senior Safeguarding Officer 'to consult directly with the Prevent Coordinator' about 'the need for direct contact with the Channel Coordinator'. Despite the policy's emphasis on student vulnerabilities and safeguarding, this section also reveals that they perceive students as possible threats. This suggests that the University has adopted the RCs' dual emphasis of safeguarding and security.

Like University G, University H's approach to the Prevent duty includes a section that advises individuals to notify the police and advise university security 'if there is an immediate threat', which suggests that Prevent-related concerned are not always confined to the safeguarding space. While the University's definition of radicalisation appears to be extensively

concerned with legal extremist views and activities, the policy also finds that concerns under Prevent are not only related to radicalisation, but that they can also 'be about terrorism, and violent extremism, or where individuals are at risk of moving from extremist (albeit legal) groups into terrorist-related activity'. In turn, the University, encourages 'any student and staff to be mindful of conduct by individuals within the University that may indicate that they are at risk of being drawn into terrorism', and to 'act appropriately to balance supporting those individuals with safeguarding others within the University and beyond'. Evidently, the University considers vulnerabilities not merely as safeguarding issues but also as potential security threats.

4.4. The vulnerability report? Identifying and reporting non-criminal activities under Prevent

While the document analysis revealed that all universities integrated Prevent into their internal safeguarding approach, it also confirmed that universities have developed external information-sharing structures to report individuals at risk of radicalisation to law enforcement agencies. This section explores in more depth how universities rely on those structures on the ground. In particular, I will examine how universities amalgamate their safeguarding commitment with intelligence-sharing practices. My interviews revealed a wide range of attitudes regarding the scope of their safeguarding responsibilities under Prevent. They also suggest that some universities are more hesitant to share information about their student body with external agencies than others. Universities will be discussed under groupings of 'High', 'Medium', and 'Low' thresholds for information-sharing.

4.4.1. High threshold: external information sharing about individuals only where there is a concern that the individual is going to commit a crime

For P.A, integrating Prevent as part of their wider safeguarding framework was not a reflection of their acceptance of Prevent: '*I don't think that our wider commitment to safeguarding means that we became more accepting of Prevent. If we had been able to devise a way not to implement Prevent, we would have taken it*'. In line with the University's low risk perception, P.A did not consider their students as particularly vulnerable to radicalisation; in turn, they did not see their safeguarding responsibilities as directly connected to Prevent: '*I don't think people were saying "this meets a need here, there are vulnerability issues at the university and Prevent provides us with a tool for dealing with them*"'. Rather, integrating Prevent as part of their safeguarding approach reflected their stance against engaging in any security activities:

> *Our main concern was keeping our security services in a box and not letting them grab the issue. The head of security and his staff would naturally, it seems to me culturally, regard the Prevent duty as something they could work with, because they see it as a way of making the university safer.*

So '*when we were talking about how to deal with Prevent, and how to apply the duty, we felt that these issues were best seen within the university context as a welfare issue, rather than a security issue*'. However, they also found that '*that's in some ways the university trying to be warm and cuddly*' which '*is quite problematic because there is a risk that the welfare services then become seen as part of the security operations. Some welfare professionals are actually quite uneasy about it*'. However, since '*there was never any prospect of the university incorporating Prevent as part of our security process*', integrating it as part of their safeguarding structures was the only way to meet their legal obligations.

At the same time, P.A highlighted that Prevent does not impose a legal duty of care upon universities: '*All it imposes on us is the duty to have regard to the need to prevent people from being drawn into terrorism. It's a broad concept and I don't think it creates a legal relationship'*. They explained that '*we have some responsibility for the welfare of our students and that's why we have welfare services. It's a moral concept, as well as a professional* [one]'. At the same time, they emphasised that '*we have to be careful not to infantilise them* [students]*, to regard them as inherently vulnerable. They are not children, and we have to, as far as we can, treat them as autonomous adults*'.

In an effort to continuously resist engaging in security activities, P.A revealed a particularly high threshold for reporting concerns to external agencies. On one occasion, a student was framed as being a radical Muslim who was trying to encourage others to join Hizb ut-Tahrir by an undercover reporter for a tabloid newspaper. In this context, P.A noted that '*Hizb ut-Tahrir is not an illegal organisation. It calls for the establishment of a theocratic state and it has unpalatable views about gay people and women, but it's not illegal*'. In light of the tabloid newspaper's accusations, P.A arranged a meeting with the student who clarified that they neither incited violence nor tried to recruit people to join any illegal activities, and in turn, P.A found that '*there was no concern whatsoever*'. They explained that '*we spoke to the local Channel person on an anonymous basis*', and '*I thought that their response would be more than it was – they seemed to be very measured and not terribly concerned. They were quite liberal and hands-off about it*'. In this case, the student did not get referred under Prevent and P.A was particularly aware of the problems associated with reporting non-criminal activities to law enforcement agencies. Here, they explained that '*Prevent does not change* [the fact that] *there is no legal obligation to report non-criminal activities. We have a duty to do our best to protect our students from being drawn into terrorism, but reporting individuals is not the only way in which they can be protected. We comply with the law if we can show that we protect them in other ways*'. University A's commitment not to engage in any securitising activities under Prevent

also allowed the university to refrain from feeding information about perceived student vulnerabilities into the CTLP. P.A '*wouldn't go anywhere near that*' document, and was openly disturbed about the idea that other universities would participate in the draft consultation. For them, '*that's really bad, really disastrous*', because in their view '*feeding intelligence about your students, about any non-criminal activities, has nothing to do with safeguarding. That really puts universities into a place in which they become part of the security services*'.

Like P.A, P.B1 declared that their threshold for reporting individuals to external agencies is high because University B '*is a very humanitarian institution, a very liberal institution, and I think that there was a realism* [about the fact] *that once you put somebody's name into the security services, it's not gonna come out again. So there needed to be real caution*'. Correspondingly, '*we said we will comply with the law, but we are not going to refer anyone to security services without due process, and even if the details of a particular case can't be made public, the process will be made as transparent as possible*'.

P.B1 found that '*the University has never outsourced our issues to external bodies provided that nobody is breaking the law*', and in turn, viewed their responsibilities under Prevent primarily as related to their internal safeguarding structures. Consequently, they developed a variety of procedures that ensured that external reports were only made after careful consideration. The explained that they '*got several gates to go through before any decision would be taken*' with regard to a potential external referral.

Here, they re-iterated that

> *We quite early took the approach that we didn't want to be heavy handed. We didn't want to get into the position of you know, those schools that reported six year olds for saying stuff. We were very aware that we wanted to be ultra-cautious in our approach. If we were going to refer someone, we have to be very, very sure that something had gone wrong here.*

P.B2 provided insight into one example, where a Prevent-related concern was dealt with without getting external agencies involved:

> *I have had one situation where an academic said to me that she was a bit concerned about one of her students, who wasn't turning up to her class, he has grown his beard, he seemed to be taking Quran classes very seriously.*

P.B2 was '*very clear that I do not believe that increased religiosity is a cause of concern. I am a priest. I want people to be more religious. That's part of my job. So I refused to read it as something dangerous*'. However, in response to the concern, P.B2

> *talked to his* [the student's] *friends and said 'hey do you know this guy?', and he was a first year student so they didn't know him that well, so it was actually the president of the Islamic society who then said, "we will find out what's going on". So it turned out that his grandmother had died in Somalia and he was upset about that, and it caused him to become more religious.*

For P.B2, this incident confirmed that '*a lot of pastoral situations are in danger of being read as Prevent kind of situations. So to be honest with you, I didn't go through the Prevent guidelines to work out what I had to do in that situation. I reacted in a way that seemed appropriate to me'*. This is a particularly interesting example of how universities' strong reliance on internal safeguarding and wellbeing structures functions as a way to ensure that individuals are not falsely referred to external agencies. It also demonstrated the suitability of comprehensive safeguarding measures functioning as a barrier to overzealous external information sharing.

P.C's attitude towards sharing information with external agencies under Prevent differed strongly from that of P.A, P.B1 and P.B2. P.C already revealed that they welcomed the Prevent duty despite their low risk perception, and explained that their positive attitude was related to their genuine conviction that Prevent has made a positive impact on the wellbeing of their students. They assured me that they see their duty as inherently related to the University's wider safeguarding commitment: '*If somebody was drinking too much, I'd be worried about them. If I thought they were being radicalised, I'd be equally worried about them*'. So if '*I had a student we thought was being drawn into terrorism, we'd be concerned about that from a welfare perspective in the same way that we'd be worried if they were drinking too much or if they had a long term illness. We'd want to take action in that way and make sure that they were okay as much as possible*'. When I asked P.C whether they developed additional safeguarding support mechanisms in response to Prevent, they replied that '*formalising the relationship with the police through an MOI* [Memorandum of Incorporation] *of information sharing has a lot of benefits. Prevent was a big driver in that, but it helped us in other ways too*'.

P.C also felt that increased information sharing with the police had enabled the University to identify many different types of welfare-related concerns within their student community:

> *For example, a couple of emails popped in this morning from the police, they saw this student last night, who is really upset and threatening to kill herself. "Could you ask the University to do a welfare check?" and so on. So they are contributing to our safeguarding provisions by telling us when our students are in crisis. They are helping us in the sense of a broader welfare approach, because*

they might come across a student who is under the influence of drugs, and who is having a really difficult time. And Prevent really helped us formalise this relationship. So that was a good thing for the students and for the University.

While P.A and P.B1 were wary that a tightened relationship with law enforcement agencies would add a security dimension to their safeguarding efforts, P.C found that their information-sharing mechanisms did not cross this line at all. They felt that rather than securitising universities, Prevent had solidified the police's safeguarding responsibilities. At the same time, they also admitted that Prevent added another dimension to the welfare element, in that it encouraged the University to share information with the police in a way that would not apply to individuals with alcohol problems or long term illnesses. Although they made a conscious effort to deal with radicalisation like any other safeguarding issue, they also found that the major difference lay in the potential risk that radicalisation poses to the safety of others. In this way, radicalisation is not merely perceived as a generic safeguarding concern, but also as a potential security risk:

When somebody doesn't seem very well and they're saying really weird stuff and drawing weird things, sending funny notes and so on, you have to work out if there is a risk. And if we are concerned about potential radicalisation, we will engage the police at that point. In the Prevent space, it's often not clear-cut at all times what you are dealing with. Somebody doesn't seem like they are doing ok, and in the course of your internal investigation under Prevent, you find out that they are actually close to engaging in criminal activities. And then it is good to have partners to call if there is a genuine concern, if there is an actual risk here.

However, more similarly to P.A and P.B, P.C revealed that their threshold for getting the police involved *'is relatively high. We would only do so if we really had a concern'*. In this way '*there are a variety of things that you could consider as Prevent-related: people indicating vulnerabilities, having controversial views, and so on. But as long as we are sure that they are not planning to engage in any sort of violence, as long as they are not a threat to others, we would be quite careful about reporting them*'. P.C elaborated with a specific example:

The closest I've ever got to a Channel referral was about a student who in a counselling session said that they wanted to shoot one of their old teachers from school. So I had a conversation with them and they continued to say that they would do it. At that point, I decided to bring the police in here, because we have given the student lots of opportunities to withdraw that intent, but they didn't. So

> *the police had a conversation with the student, who then assured them that they didn't really mean it, and it was all about them struggling at the University, not fitting in.*

P.C also revealed that the student '*was absolutely outraged, put in a massive complaint that we reported them to the police. But that's the kind of thing you need to do*'. This example is worth highlighting, because it reveals a certain conflation between radicalisation and the intent to commit a crime. From what the participant revealed about this case, it is not at all clear that the desire to shoot a former teacher is related to radicalisation or extremism in any way. Rather, such examples suggest that universities' commitment to safeguarding students from becoming radicalised may have transmuted into a wider concern to prevent students from committing crimes, in turn increasing institutions' readiness to involve the police.

It is thus of some significance that P.C reiterated that Prevent has solidified their information-sharing mechanisms with law enforcement agencies in a way that went well beyond formal Channel referrals. They explained that

> *the information sharing around the CTLP is not a recent thing for us. We've been involved for about seven or eight years. I have a memorandum of understanding in terms of data sharing with the police. So we'll share data between us for a number of conditions. The prevention and detection of crimes, for the purposes of counter-terrorism, and event to a certain element around anti-social behaviour. The relationship with the police built up over the years to grow really strong, and Prevent has contributed to that, because it means we can share information that is not only related to crime, but also about wider safeguarding concerns.*

On the basis of this relationship, the institution was able to feed information about their students' perceived vulnerabilities into the CTLP:

> *My contribution to the CTLP was that we've got Syrian students coming to study with us. We need to protect them in case that they are subject to hate crimes and all that kind of thing. We have to also make sure that they are not caught up in all the controls that are being put around travel from Syria because we actually want them to come here.*

In this context, they explained that they were able to shift the focus of the CTLP from a singular focus on perceived threats to a focus on safeguarding and supporting individuals. Here we see an excellent example of 'vulnerable' students being perceived not as the threat, but rather as 'at risk' of being framed as security threats and of being subjected to far right extremists' hate. We

can thus identify a strong contrast between P.A, who considered universities' involvement in the CTLP as a security measure, and P.C, who believed that increased intelligence exchange with security agencies had led to an improved focus on welfare and safeguarding. This implies that it would be wrong to interpret every involvement of universities with law enforcement agencies as a securitising act.

P.D explained that their existing safeguarding mechanisms enabled them to respond appropriately to radicalisation-related concerns. On one occasion, a student's marks decreased significantly half way through his final year, and after his tutor tried to find out the reasons for this, the student disclosed that '*he came from a quite extreme family, hardcore conservative Muslims, holding quite extreme Islamic views. And he was in such a mess personally because his degree was coming to an end and his parents at that time had told him that he should martyr himself*'. In this instance, the University decided to refrain from a formal Channel referral. Instead they '*spoke with the police about him and I spoke to the Prevent Coordinator, and we put interventions in place to support this young man. He completed his studies and got into a reasonable space*'. According to P.D, the occasion '*didn't need the mechanisms of Prevent*'.

At the same time, P.D. found that Prevent was closely related to their wider safeguarding approach because

> *when you look at the things that make an individual vulnerable to radicalisation, they're the same predisposing factors for sexual exploitation,* [and] *financial exploitation. And those things are much more common than the Prevent risk. So we should be doing welfare anyway. That's part and parcel of what being a university is, and Prevent is just one subset of it.*

P.D also shared their experience with the Channel procedure. Initially, the situation was '*treated exactly like any other safeguarding issue*', in that '*concerns were bought to my attention and we put together a group of people to do a risk assessment*'. The group involved P.D, '*a lawyer, and a staff member who works on child protection and safeguarding*'. Together, they '*went through what people were seeing and observing, what we knew about that individual*', and '*presented that to the Registrar to make a recommendation as to what should happen*'. P.D recommended making a Prevent referral to the local police, but also revealed that this caused '*a battle with one of the lawyers as to whether we should refer it or not*'. They explained that '*the lawyer was against it because of the Prevent brand. It's a challenging one, and it's been described as toxic. We're a liberal institute and referring somebody from within a liberal institution to agents of the state is a challenging thing to do*'. And although P.D appreciated the reasons for the lawyer's hesitation, it also '*caused a delay that allowed for enough time for the individual to leave the country over the Christmas break*'. When the individual '*returned, for reasons I can't reveal, they*

were not handled by Channel'. In line with P.B1 and P.C, P.D emphasised that '*the threshold* (for making an external referral) *was extremely high*', and that they would not have suggested getting the authorities involved if they were not '*confident that the student is on the way to commit a crime*'.

P.I also felt that '*a lot of stuff that we do in terms of Prevent is very much part of our safeguarding culture*' because '*our feeling is that when you look at where concerns come through, there tend to be indicators around vulnerability. And that doesn't mean that there's a direct correlation between those things, but your overall approach always has to come from a safeguarding perspective*'. Rather than seeing their main responsibility as being that of reporting individuals to external agencies, '*we try to reduce vulnerability, because then the likelihood of people being drawn into any kind of extremism is reduced*'. Concomitantly,

> *the majority of our work is to focus on tensions between groups on campus, because that's how we aim to reduce vulnerability and the risk of people being drawn into extremism. We want to make sure that we don't get environments where tensions can rise and where people then feel grievances, so we do a lot of activity around the safeguarding side in terms of looking out for vulnerable people and internally supporting them through appropriate methods.*

P.I explained that only when '*we see actual cases where radicalisation already happened, then Channel is the go-to point*'. In contrast,

> *when we talk about vulnerabilities we talk about more generic things like anxiety, depression, loneliness, grievance. Those are the things we're trying to address at a more fundamental level, which means that people don't take the next step and find other communities that draw them into something that would then need them to go through Channel.*

In this way, P.I did not perceive their safeguarding responsibilities as primarily involving protecting people by reporting them externally. Rather, '*the heart of our approach is to ensure that people are feeling better overall, which makes them less likely to develop any sort of vulnerability*'.

P.I also revealed that their threshold for reporting individuals externally was high: '*We take a very moderate view before we bring anybody in, and it doesn't happen very often. In the majority of cases we find that there is a vulnerability and they just get supported through our normal structures*'. They drew on an example in which '*a student that was brought to our attention by another student because it looked like they were searching weaponry on their laptop and it looked like there was a conversation going on in the corner of their screen*'. In this case '*we looked into the student, we found that they were already engaged in counselling services and that there were some concerns about loneliness and isolation*'. In

response to the concern, '*the counselling service brought the person in to talk to them openly, not to mention the words radicalisation, or Prevent, or terrorism but to talk to them about what had been observed and to explore what was going on*'. In this context, P.I emphasised that '*it wasn't a case of profiling Muslim students, it was actually a Chinese student*'. Following the conversation '*it was very obvious that there was no concern that the student would actually do something criminal, and we didn't need to go to do any further action. So we took a very moderate approach*'. They reiterated that

> *it would be only when we have a really significant concern that we would actually then go and talk to police colleagues through our security team to say: "Actually this is something that we need you to look at, could you see what you've got in terms of intelligence as well? And do we need to make a referral?"*

This statement is particularly interesting for two reasons. First, it reveals the existence of informal information-sharing mechanisms that do not rely on Channel referrals. In this case, the University is able to gain additional information about an individual in order to inform further decisions about potential formal referrals. Secondly, it confirms University I's understanding that Prevent requires a dual response that treats concerns internally through safeguarding mechanisms and externally through security structures. P.I even explained that

> *external referrals sit with the security team of the University, because they are our conduit between the police service and the University. So we're very clear in terms of our relationships with external parties that our route out and in is through the security team – any type of police interaction goes through that.*

In this way, P.I fully acknowledged the dual safeguarding and security dimension of Prevent: '*if there is actually an external referral, it would go via the security route because of their connection with the police liaison officer, but it would have still gone through our welfare structures before. It wouldn't have gotten to security without going through our checking process*'. For them, the University's safeguarding approach functions as an extra layer of protection to '*make sure that we're not raising something that we think is inappropriate on the basis of concerns that we haven't validated internally*'. External referrals are only made '*where we think it has reached a sufficient level, and that's a really good check and balance, to be able to ensure that we have done all of our due diligence before we might raise something further*'.

P.I also revealed that adopting this high threshold for reporting concerns externally has caused suspicion among monitoring authorities and their RC:

> *We are encouraged to feed back information to the CTLP. But what we find is that in reality, the concern is greater than the actual prevalence appears to be. So whilst there are concerns about radicalisation, specifically about Muslim radicalisation, in reality we don't feel like that is the case.*

In this context, P.I

> *had a really interesting conversation with the RC at that time, and they almost had a Donald Rumsfeld attitude with weapons of mass destruction in Iraq. It was like, the fact that we can't see the threat means that it absolutely exists. And my views was like, no it means that maybe it doesn't exist. I'm quite happy for people to say: "Maybe you should consider whether you have any blind spots at your institution?" But we think we are on top of that, and you cannot say that only because we haven't pushed a specific number of people through referrals.*

They found that the RC's attitude is '*a problem, because I'm not gonna lower the threshold and put forward people to referrals just to reach a target so that you can feel like you're getting the level you should get, if I'm not seeing it on the ground, if it doesn't come up through our structures*'.

My participants' high threshold for reporting individuals externally can be read as an open resistance to a perceived 'target culture', where Prevent committee members feel that they are unjustifiably expected to report a certain number of people to prove the government that they are fully on board with Prevent.

4.4.2. Medium threshold: external information sharing about individuals who express extremist views without an immediate concern that they are going to commit a crime

P.H also felt that the high threshold for reporting individuals to external agencies meant that '*the number of cases that come out of higher education are incredibly low*'. They added that '*I've been to various meetings with the police and they were saying "we don't really know why the numbers are so low, they should be a lot higher*"'. In the view of P.H, the low level of reporting is because '*when compared to schools, it takes a lot more for something, a view or a behaviour, to stand out in the university context and to actually be a concern because the environment is so different. It's a very different mindset.*'

Despite universities' comparatively high threshold for making formal Channel referrals, P.H disclosed that they '*have had a couple of cases that we referred to the police for investigation and one quite recently has gone through Channel*'. This last concern was related to

> *a first year student who was putting quite a lot of material on social media that was very Zionistic and caused a lot of concern for fellow students, peers. They expressed their concerns about what this*

> *guy was putting on social media, so they got in touch with me and showed me all the screenshots and everything that he's been saying.*

P.H explained that

> *there was quite a lot – not necessarily hatred– but you know, it started off as a few posts here and there, but it was the intensity with which it kept building up. And that was enough to cause some concerns. There were some references that implied support for various war crimes and extremist actions that had happened in the past. And he was actually the president of the student union's Jewish society, and was involved in various other political groups.*

In turn, P.H '*took the view that because of what he* [the student] *was displaying online and because of his active involvement in various political groups in combination, that was quite a dangerous combination*'. And although P.H clarified that this did not mean that they perceived the student as at immediate risk of getting involved in violent activities, they '*decided to take it to the Police Prevent Officer, who said "thank you very much for reporting this, we are going to get in touch with them". And he* (the student) *agreed to go through the Channel Process*'.

This example is illuminating, because it suggests a lower threshold for reporting individuals externally than in the cases of P.A, P.B, P.C and P.D, who would only consider reporting individuals when perceiving an immediate danger of violent activity. In contrast, P.H reported an individual not in order to stop them from becoming a terrorist, but to stop them from solidifying their extremist views. The interview with P.H was therefore particularly interesting, because it suggested direct acceptance of RC1's 'river of radicalisation narrative', which maintains that extremist views will inevitably escalate into violence if left without intervention (see §3.1.3 above). P.H found that the student '*responded really well to the engagement and he doesn't demonstrate any of the views that he had before. And we were also able to support him internally, our counselling team helped him get involved in rugby so he is much less isolated now*'. P.H emphasised that this was a desirable outcome, especially when compared to a scenario in which nobody had intervened and the student '*would have gone further down that line and would have actually at one point committed a serious offence*'.

P.N1 assured me that '*we have always taken the view that Prevent should be about supporting potentially vulnerable individuals*'. Therefore, '*Prevent always sat very, very closely to our support services and our standard policies around supporting students. We don't see it as an extra thing. We try to embed it in what we do*'. While University N's policies suggest that they have internal information sharing procedures in direct response to Prevent, P.N1 revealed that '*this is more something to show the*

external audiences like the DfE and the OfS. We can point to something and say "look, this is where all our information about Prevent is". But actually, on a practical day-to-day level it's fully embedded in everything we do'.

Following up on this explanation, P.N1 highlighted that '*if somebody came to us with a Prevent concern, something they had labelled Prevent, it would be treated in the same way as if we were concerned about a student taking drugs or about their mental health, the way they interact in class or something like that*'. At the same time, P.N1 also acknowledged that '*once it* [a concern] *ticks the Prevent box, it* [the University's response] *goes beyond our safeguarding-as-usual structures. Because then it's about talking to local advisors, going to Channel and so on. There is a difference in how you escalate a concern if it ticks the Prevent box*'. P.N1 found that '*we wouldn't just refer somebody because they have vulnerabilities that could be exploited by terrorists. But we would engage if they were actively reaching out for extremist material, if they were putting out messages that we could see as radicalising others*'.

The participant was able to offer an example of such practice. On one occasion, '*concerns were raised about a student who had shared messages with other students on WhatsApp, and one of the students got concerned and flagged it as a Prevent student because they thought that the student was looking at material that is designed to radicalise*'. They explained that '*there was some symbolism that had ticked the box in somebody's mind and that said "well there's Arabic writing on it and there's somebody posing with a gun, so it must be around terrorism"*'. However, P.N1 found that '*when you actually got into the content of what was being discussed, there was no radicalising message. We made the decision that this isn't a concern about somebody being drawn into the potential for terrorism*'. Accordingly, they found that their internal safeguarding structures and reporting systems functioned as a way to prevent overzealous external reporting:

> *If we had a separate Prevent process, it would trigger all sorts of responses, but we are committed to try and take that interpretation of what Prevent is first ourselves and how we think it should be considered within our university, rather than have it as a kind of separate thing with more external involvement.*

P.N1 explicitly highlighted that '*we would never disclose information about our students without having first considered, and in some cases taken legal advice, about whether it is an appropriate thing to do, to share that information. And if there is a real legitimate reason to share information depends on the case*'. At the same time, they also revealed a lower threshold for reporting individuals externally than P.A, P.B, P.C, P.D, and P.I: '*we would refer somebody if we were seriously concerned that they are in the process of being radicalised, even if we don't think that they would go off and do something criminal in the near future. That's something we want to prevent, the intent to commit an extremist offence*'.

4.4.3. Low threshold: external information sharing about vulnerabilities that render individuals at risk of radicalisation

P.J suggested that their threshold for sharing information with the police was relatively low, and that they would even consider sharing information about individuals informally in cases where they would not make formal Prevent referrals. P.J explained that the lower threshold emerged in response to the proactive nature of their police contacts, who requested information about individuals in the past without evidence that they may be involved in criminal activity. As they put it, '*it has been sometimes quite generalist, to the point that the line between what Prevent is and what it is not becomes a bit vague*'. P.J said that they had '*tried to push back on that a bit with the police officer, because someone having political ideas in a specific area doesn't necessarily mean they would be a Prevent concern. So there is a potential for that to become very vague and we start worrying about everything*'.

At the same time, P.J confirmed that '*we would obviously share information if there was a specific Prevent-related situation, so if there was an individual who was declaring things, you know, say something in class, which is concerning*'. In this case '*you then have a conversation with the person and you try and explore that. And if you think that they are at risk of radicalisation, then you take it to the Channel Panel*'. While the participants discussed in the two sections above all emphasised that the mere expression of controversial views did not constitute a sufficient reason for a referral if there was no reason to believe that the individual may take any extremist actions, P.J felt that the mere concern that a student may become radicalised in the future constitutes sufficient grounds for referring them to the police. And while P.I emphasised that '*the inclination would be to try and get support within the University first, safeguarding, and do that assessment*', in cases '*where I'm not sure if it should become a formal referral, I'd take it to the police and say, what do you think, is this a Channel case?*' P.J also noted that their university '*would probably report something if they weren't sure, because if it's anything with high impact on the institution, our reputation, they would feel like they had to*'. They added that '*the nightmare is that one of our students goes off and does something, because it's terrible for them and everyone involved, but it's also terrible for the University if that comes out and you missed a sign somewhere*'.

In a similar vein, P.L maintained that '*we intervene early*'; for them, this course of action '*just comes out of our primary purpose to safeguard*'. In line with RC1's 'river of radicalisation' narrative, P.L found that '*we don't want to wait* [to report concerns externally] *until we have clear evidence of an imminent, serious danger*'. Instead,

> *we have a conversation with people like the police early onwards. Often it's on an anonymous basis, a sort of hypothetical "what if we had a student who was doing this, who was looking at this, about*

> *whom people were saying this what should our view be? Would that be of interest to you? Would you have any advice for us around that level of risk? Does this corroborate with anything else you're hearing, etc.?"*

While P.L acknowledged that '*we need to understand what sharing such information means for the individual concerned, and we need to be confident that our concerns are serious enough to warrant that*' step, they also explained that in some cases '*we genuinely need advice*'. Similarly, P.L also expressed a full awareness of the high likelihood that

> *the police will ask us to provide further details about that individual, and they have a fairly low threshold for this. Probably more often than not their preference is to say "give us some more information and we will take that away". And I mean basically they take that name and any kind of other information, they are special branch so they check whether that corroborates with other names in their system. The student might be part of an already registered community, where there are some sort of red flags, or if that student was engaged with some organisations before.*

P.L also clarified that all that '*is not about any suspicion of criminal activities; it's about Prevent*'.

P.P, who never had to refer anyone externally, revealed an equally low threshold for reporting an individual under Prevent (at least in theory). They explained that '*I officially know the Channel reporting mechanisms in the city, and I have contacts with the RC, so I could go via both routes. I never had to, but I know the people I would need to talk to*'. They explained that '*if somebody raised a concern about an individual under Prevent, I would review that. And I think I would make sure that they were offered support from Channel if they were at serious risk of radicalisation*'. Elaborating, they suggested that there are several '*factors to take into account. For example, if we somehow learned that the student was targeted by extremists, that they were in the process of being groomed, that would ring our alarm bells*'. On this score, P.P also felt that

> *we don't only want to step in when they have already developed a sort of hardened extremist mindset; we want to make sure that they receive support as early as possible, because it makes it easier for them to resist further grooming and the pressure to maybe in the future engage in terrorist activities.*

While most participants did not see evidence that an individual was developing non-violent extremist thoughts as a sufficient reason for reporting them to Channel, P.P would (at least hypothetically) be ready to report individuals who they perceived to be in the process of developing certain thoughts.

4.4.4. Unclear threshold for external information sharing

In some of the selected cases, it was not possible to establish a threshold for external information sharing. P.E confirmed that their approach to Prevent on the ground was integrated into their wider safeguarding mechanisms: '*if somebody was vulnerable in those ways, we would be looking to support them because of those vulnerabilities*'. They highlighted the importance of '*good pastoral support, which enables you to picking up those vulnerable students, and then you're more likely to get the context and hear their views*'. At the same time, P.E revealed that so far, '*there have been so few internally reported concerns that were directly related to Prevent – we are talking single figures*'. When I asked them at what stage they would consider reporting such concerns externally, they said '*it is difficult to give an answer to that, because it really depends on the situation. So far, we haven't referred anyone to Channel*'. P.Q and P.K gave very similar responses. So far the universities did not report anyone to Channel and both participants suggested that decisions about the external reporting of individuals are highly contextual and do not adhere to a pre-determined threshold.

P.F was not able to provide more extensive information about their threshold for reporting individuals either, because they had '*never made a referral*'. P.G felt '*lucky because our Prevent police practitioner always pushed safeguarding*', which meant that '*right from the start they said this is a safeguarding issue*'. In turn the University '*worked very closely with our student services, and they were doing our safeguarding policy and we wrapped Prevent into that*'. Like P.E and P.F, P.G was not able to provide more nuanced information about their threshold for reporting Prevent concerns externally because '*we have so few internal concerns, and we never had to refer anybody to Channel. It was always very clear*'.

P.M told me that '*we wanted to provide a framework where Prevent is an integral part of safeguarding*', because '*while Prevent can be interpreted in many different ways, safeguarding is probably a more relevant terminology, so we wanted a single process and reporting mechanism, rather than having different approaches to safeguarding concerns that are unrelated to Prevent and extremist-related safeguarding concerns*'. They explained that '*if we had an internal referral and felt that there was potentially an issue that we needed to then escalate, we can either do that through the Prevent RC or through the Channel process*'. P.M further explained that '*we wouldn't necessarily go straight to Channel: we would seek a position from the RC just to make sure we hadn't misunderstood anything. We would then take that back and if we then needed to escalate that outside the institution we would probably do so through the Channel process*'. But because '*we've not found ourselves in a situation where we've had to make that decision*', P.M was unable to reveal more about their threshold for reporting concerns externally.

The interview with P.O confirmed that they saw their duties under Prevent primarily as related to their existing safeguarding structures. But they were not able to provide more nuanced

insights into their threshold for external referrals. They merely revealed that '*last year, we had two incidents that we had to consider under Prevent, but we decided that we did not have to report them externally*'. However, P.O was under the impression that providing me information about the cases would risk the possibility of identifying the individuals and the institution, which is why they refrained from disclosing details about the two cases. They merely emphasised that '*the sector as a whole has a high threshold for reporting individuals externally*', and reiterated P.H and P.I's impression that '*there is some suspicion around the low number of referrals coming from universities*'. In their view, this was the driving factor behind the OfS's request for information about all welfare referrals, and not only those related to Prevent. P.O was under the impression that the OfS was '*worried that* [universities] *existing mechanisms are not functioning*' which would be reflected in a scenario where '*universities didn't have any welfare concerns at all*', that this '*would show that their reporting system is not particularly efficient*'.

4.5. Conclusion: Prevent between safeguarding and securitisation

Overall, the document analysis and the interviews suggest that although all universities are compliant with Prevent, they display very different levels of engagement with the duty. In turn, this finding has implications for investigating the extent to which universities have assumed security roles under Prevent. This chapter has shown that all universities were able to integrate Prevent into their existing safeguarding approach. In this way, all universities were initially treating extremist-related vulnerabilities in a similar way to all other safeguarding concerns. This suggests that universities are not necessarily drawn into any sort of security activities under Prevent.

However, universities are not merely required to provide appropriate safeguarding and welfare mechanisms to increase the resilience of their students in order to protect them from radicalisation. They are also required to be ready to intervene actively by reporting students to law enforcement agencies. In this context, we have seen that not all universities are equally willing to engage in information-sharing about their students, especially in the absence of criminal activity, or the intent to engage in criminal activity. Universities with a particularly high threshold for reporting were acutely aware that referring individuals to law enforcement agencies is not merely a safeguarding measure, but also a direct response to a perceived threat posed by that individual. In turn, they were more hesitant to assume this role under Prevent. While the low referral rates across the sector suggest an overall hesitation on the part of universities to engage in securitising activities, the interviews also revealed that some participants are more willing to engage in informal information exchange with law enforcement agencies. In some cases, this

involves sharing personal information about individuals, which means that those individuals are registered by the police without having gone through a formal Channel referral.

Moreover, some participants revealed that they have a higher readiness to report individuals to law enforcement agencies, even in the absence of any involvement or intent to get involved in violent extremist activities. In these cases, versions of the RC1's 'river of radicalisation' narrative featured strongly as a justification for referring individuals to law enforcement agencies. In the view of such participants, not intervening would inevitably lead to criminal activity at a later stage.

My participants confirmed that a heightened awareness of the threats posed by individuals who had not (yet) committed crimes was a direct result of their effort to comply with their safeguarding and duty of care responsibilities under Prevent. In this way, some universities assumed the role of paternalised agents of security. A prevalent culture of care has paved the way for compliance with the objectives of a reframed security move, whose language has shifted from an emphasis on policing strategies to counter extremism and radicalisation to one of safeguarding the welfare of their supposedly vulnerable students.

5. BALANCING ACADEMIC FREEDOM AND FREEDOM OF SPEECH WITH SAFEGUARDING RESPONSIBILITIES: EXTERNAL SPEAKERS UNDER PREVENT

Chapter overview

This chapter examines universities' approaches to ensuring free speech and academic freedom under Prevent. It asks whether the enactment of Prevent in the external speaker area provides evidence for the securitisation of legal extremist views. First, I will analyse 'the extent and nature of the action or behavioural change following from the speech act' (Floyd, 2016, p. 668), by exploring how the seventeen universities have integrated Prevent as part of their external speaker procedures. According to Floyd, the first condition for successful securitisation is a 'change of action' in response to the threat. Whether any change of action in response to Prevent has occurred in the area of external speakers can be explored by using a variety of methods, including interviews and policy analysis (Floyd, 2016, p. 688). Correspondingly, §5.1. draws on an analysis of documents that highlight universities' approaches to managing controversial debates on campus. I reviewed the data with a view to answering the following questions:

1. How do universities balance the responsibility to uphold freedom of speech with their responsibility to shield staff and students from radicalising thoughts?
2. How do universities address their safeguarding responsibilities in the external speaker area?
3. Do universities develop mechanisms in order to identify and mitigate the risk that students and staff may be exposed to extremist thoughts through external speakers?

Section 5.2. draws on the interviews with Prevent Committee members to shed light into how Prevent has impacted events involving controversial speakers. In this way, the interview data not only supplements the document analysis, but also allows for an exploration of the extent to which the policy documents accurately reflect their enactment on the ground. Moreover, the interviews were conducted and analysed with the aim of 'locat[ing] the justification for the measures to address the threat (that is, the action or behavioural change)' (Floyd, 2016, p. 688). By exploring how my interview participants have manged events involving extremist speakers in practice (or how they would manage such events if they occurred), I shall explore if they navigate legal (yet extremist) views differently as a result of Prevent, and how they justify newly developed mechanisms to mitigate the risk posed by extremist speakers. The chapter concludes by discussing

the implications of any new structures in the external speaker area for the securitisation of legal extremist views.

5.1. PREVENT ON PAPER: ACTION AND CHANGE IN POLICY DOCUMENTS

5.1.1. How do universities publicly position themselves with regard to free speech and academic freedom under Prevent?

The first part of my analysis draws on public-facing policy statements in order to provide an initial overview of universities' perspectives on free speech and academic freedom under Prevent.

While Universities D, L, M, O, and P did not publish any information about their approach to free speech and academic freedom under Prevent, the other twelve universities explicitly linked their approaches to their duty to uphold free speech and academic freedom. However, their statements reveal interesting differences in the extent to which they emphasise the safeguarding element in relation to their free speech and academic freedom obligations.

For example, University A does not engage at all with its duty to shield university members from potentially radicalising influences in the form of radicalising speakers. Rather, they are primarily 'cognisant of the explicit responsibility in the CTSA to "have particular regard to the duty to ensure freedom of speech" and the importance of academic freedom'. University C refers to the same paragraph in the CTSA and highlights the 'legal obligation to promote and facilitate academic freedom and freedom of speech' as a key priority in their 'wide-ranging set of responsibilities'. However, as opposed to University A, University C also acknowledges that their code of practice on freedom of expression is not only their 'core document' for highlighting the University's 'commitment to academic freedom and the promotion and encouragement of free expression', but also their basis for 'managing the risks around external speakers'. In this way, the University tries to balance their dual responsibilities to uphold free speech and to safeguard their members from potentially radicalising influences under Prevent.

University B chose to publish their response to the early consultation for the Prevent duty guidance. Here, they expressed their concern that their obligations under Prevent are inconsistent with their responsibilities 'under the Education No 2 Act 1986 to ensure freedom of speech within the law on campus'. University B is 'reasonably comfortable' in their 'ability to judge at what point a speaker might be fairly deemed to be promoting or glorifying terrorism and thus should be banned from speaking'. However, in their view Prevent requires universities to intervene 'to stop people moving from extremist albeit legal groups into terrorist-related activity', which implies that the University would have to 'place limits on free speech which in itself does not risk breaking the law'. The University informs HEFCE and (by publishing their response on

their website) their wider audience that this goes against the values of their institution, highlighting that they 'consider that democratic values are better promoted by engaging with extremist views rather than driving them underground'. In a further letter exchange with HEFCE, University B welcomes their regulator's acknowledgement of the fact that a university must 'balance its legal duties both in ensuring freedom of speech and academic freedom, and also promoting student and staff welfare'. In this way, the University's public statement resembles that of University C, who highlight their priority to ensure freedom of speech and academic freedom, whilst at the same time acknowledging that they have a duty to protect their students and staff.

All the other universities' policy statements present a combined focus on free speech and safeguarding as part of their approach to external speakers under Prevent. For example, University K explicitly acknowledges their twofold responsibility under Prevent. Although the University considers it to be a 'dual challenge', they seek to ensure that 'both academic freedom and the protection of staff and students sit together side by side'. This statement is interesting, because by using on the word 'challenge', they indicate that from the outset they considered both obligations as conflicting, at least potentially. The statement is followed by the declaration that 'free and open debate of often controversial subjects is a key element of University life', and that they 'will always seek to allow events to go ahead providing that they are within the law'. University K also emphasises that 'its initial position would always be to allow an event to go ahead, unless there was a clear, evidenced and insurmountable Prevent concern'.

Universities G, N, and Q provide policy statements that similarly declare that they have developed 'systems for assessing and mitigating risks around external speakers and events on campus, while maintaining the existing duty to promote freedom of speech'. Such statements place an equal emphasis on free speech and safeguarding, and none of the universities imply any struggle to balance those responsibilities.

While University B explicitly challenges the statutory guidance, University J asserts that the guidance requires them 'to pay particular attention to external speakers and events on campus'. Similarly, Universities I and Q rely on the guidance's emphasis on the potential risks posed by external speakers 'as a key area of attention'. A direct reference to the Prevent duty guidance's key safeguarding areas indicates a higher level of acceptance than in the cases of Universities A, B and C. At the same time, Universities I, J, and Q seek to assure their audience that they take their free speech obligations seriously. University J acknowledges the 'need to balance our Prevent duties against our legal duties in terms of ensuring both freedom of speech and academic freedom, whilst also protecting student and staff welfare'. University I does not explicitly refer to their legal duty related to freedom of speech and academic freedom, but asserts

their commitment to maintaining an environment that 'encourages all members of the University' to 'engage in debate'. They report that 'the area of greatest change' they made in compliance with the statutory guidance is their updated code of practice relating to external speakers and events. As opposed to University B, who imply that their existing structures already enable them to carry out their legal obligations, University I's statement suggests that they have amended their structures in response to the Duty.

University Q equally does not explicitly highlight their legal obligation to uphold freedom of speech, but is committed to 'encouraging events with stimulate open debate'. They also inform their audience that they 'prohibit any public expression of views on our premises that are in beach with the law *or* incite intimidation or violence' (my emphasis), a statement that is somewhat confusing as the incitement of violence in itself constitutes a breach of law. In contrast to the above universities, University Q decided to provide an overview of the system they developed in response to Prevent. Their method for mitigating risks around external speakers under Prevent relies on a risk assessment that entails a set of 'initial questions' that event organisers must respond to when inviting an external speaker. If their assessment indicates that the speaker is 'known to express views' (or promotes a title or theme) that present 'a potential risk' that they are in breach of the Prevent duty, the event organisers have to submit an additional external speaker form. The same applies when the proposed speaker or theme is 'likely to attract attendance form individuals/groups that have previously been known to express views that may be in breach' of the Prevent duty. This procedure signals that the University does not merely have systems in place to mitigate the risk that speakers may promote illegal views, but also views are in breach of Prevent, which can include legal views too. Whether other universities have developed similar procedures in direct response to Prevent will be explored as part of the policy document analysis below. The fact that University Q chose to highlight their procedures to shield students and staff from the radicalising influences of external speakers suggests that they place a stronger emphasis on their safeguarding responsibilities than on their free speech obligations, at least in their public-facing documents.

Although University H highlights its 'long and rich history of regularly welcoming speakers from around the world', they also emphasise that they have 'identified external speakers as a small but potential risk for its staff and students'. Like University Q, University H chose to place an emphasis on the risk associated with external speakers, and not primarily on their efforts to ensure free speech. Moreover, acknowledging external speakers as risk sources is much more explicit than considering them as a 'key area' of attention (like Universities I, J, and Q). In response to that risk, University H urges event organisers to follow their external speaker policy. In contrast, University E uses their Prevent website as a means of assuring its audience that they

are 'strongly committed to providing an environment for robust, challenging debate and to championing freedom of speech within the law'. While they acknowledge that some events and external speakers may raise concerns under Prevent, they aim to 'facilitate an open and transparent dialogue with the event organisers' in order to 'establish whether the event can take place whilst ensuring the University meets its legal obligation'. Interestingly, University E also decided to use their public facing website to highlight that they may put 'additional safeguards in place' in order to allow controversial events to proceed 'whilst ensuring the safety of our students, staff and visitors'. In this way, the University seems to reassure its audience that mitigating procedures do not pose a threat to free speech. Rather, safeguarding procedures are framed as enablers of free speech under Prevent.

The review of the public statements on freedom of speech and safeguarding in relation to external speakers under Prevent reveals that universities choose to emphasise different priorities. Universities portray themselves on a freedom of speech–safeguarding continuum, with 'freedom of speech' on one end, and 'safeguarding' on the other. Universities A and B position themselves unambiguously on the 'freedom of speech' side. Universities C, K, and E acknowledge their safeguarding responsibilities, but are particularly expressive about their emphasis on freedom of speech. Universities N and G find themselves in the middle of the spectrum, with an equal emphasis on freedom of speech and safeguarding. By highlighting the statutory guidance's emphasis on external speakers as a 'key area' of concern, Universities I, J, and K find themselves closer to the 'safeguarding' side of the spectrum. Finally, University Q's emphasis on assessing the risk of external speakers places them in the closest proximity to the safeguarding end of the continuum. Whether the variations in universities' emphasis on safeguarding and freedom of speech are reflected in their policy documents and on the ground will be explored in the subsequent sections.

5.1.2. Do universities place additional limitations on free speech to comply with Prevent?

The following document analysis explores universities' understandings of the nature of expressions and views from which they ought to protect their students and staff order to demonstrate due regard to their duty to shield them from radicalising influences.

Despite drawing attention to their legal obligation to comply with the Prevent duty in the external speaker and free speech area, Universities E, F and M do not indicate whether Prevent has changed their approach to dealing with legal extremist views.

In contrast the Universities A, B, P, and N emphasise that the Prevent duty has not made an impact on their understanding of freedom of speech, and in turn highlight that they continue to allow the expression of legal extremist views. University A even places 'greater emphasis on

the importance of freedom of speech and academic freedom' in response to Prevent. They continue to prohibit events involving a speaker who 'belongs to or professes to belong to a proscribed organisation' under the Terrorism Act 2000, but did not make any changes to their external speaker regulations under Prevent.

In a similar vein, University B maintains that 'the Counter-Terrorism and Security act and the statutory duty do not in any way change the definition of free speech within the law', and that 'support for or promotion of terrorism is already illegal under previous legislation'. This suggests that the University does restrict the expression of legal extremist views that are not covered by previous terrorism. Likewise, University P highlights their belief that any effort to mitigate the risk of being drawn into terrorism is exclusively focused on the expression of illegal speech that is already covered by legislation that precedes the Prevent duty. While they acknowledge 'the risk posed by extremist speakers', they unambiguously declare that 'the law remains unchanged' in that 'the only reason for banning a speaker' is 'that either the speaker is form of a proscribed organisation', or that the 'risk of public disorder is beyond the financial/security capacity of the University to manage'.

Similarly, University N emphasises that 'the expression of controversial views which are not unlawful per se will not normally constitute reasonable grounds for withholding facilities for an event'. This approach is mirrored by University D, whose policies declare that they will not provide 'an environment which leads to the unlawful expression of views'.

These statements differ significantly from those entailed in the policy documents of Universities G, H, K, L and Q. Although University K encourages 'free and open debate on what are often controversial topics' and is committed 'to allow events to go ahead providing that they are within the law' it is not clear whether the University considers non-violent extremist views as 'within the law' under the CTSA 2015. Their policy highlights the limitations of free speech, declaring that 'this freedom does not extend to allowing a speaker to commit a criminal offence' which is related to 'Counter Terrorism legislation'. As opposed to universities which clearly state that the CTSA does not impact on the scope of free speech, University K includes the CTSA 2015 in the list of Counter-Terrorism legislations that pose limitations to free speech.

In a similar vein, University G finds that the CTSA 2015 constitutes an 'Act of Parliament that constrain[s] free speech', alongside the Terrorism Acts 2000 and 2006, and University H and Q equally acknowledge 'that it has a legal responsibility to create a balance between minimising the possibility that extremism *or* unlawful conduct will arise on campus and ensuring that it meets is legal obligations in relation to ensuring freedom of speech' (my emphasis). Both universities differentiate between unlawful conduct, which is clearly defined within the Terrorism Acts 2000

and 2006, and extremism as defined as part of the CTSA 2015, which is lawful. The policies suggest that they see themselves as responsible for restricting lawful extremist views if they consider them as conducive to radicalising individuals on their campuses.

Likewise, University L recognises their 'legal and moral responsibility to minimise the possibility of radicalisation'. In particular, 'there may be occasions when the University determines that limitation of expression is permissible where public safety and/or lawful conduct is put at risk'. This statement implies that the University could potentially limit the expression of legal extremist views on the ground of their legal and moral obligation to minimise the possibility of radicalisation, especially when legal extremist speech is considered to put public safety at risk.

In their freedom of speech codes of practices and external speaker policies, universities revealed different understandings of the nature of the expressions and views from which they ought to protect their students and staff in order to demonstrate due regard to their duty to shield them from radicalising influences. Specifically, the policy documents reveal two tendencies in universities' understanding of their responsibilities under Prevent. One group stresses that Prevent does not constitute legitimate ground for curtailing legal free speech at all, while the other group implies that the CTSA 2015 changed the scope of free speech. The documents do not clearly indicate whether this means that the latter group of universities now restrict the expression of extremist (yet legal) views on their campus. This question will be explored in §5.2.

5.1.3. How do universities manage events involving controversial speakers, and how does that relate to their Prevent duty?

Analysing the relevant documents, we will find that all universities already had existing structures in place to manage events involving controversial external speakers before the Prevent duty was introduced in the higher education sector. At the same time, it will appear that some universities have amended their existing structures in response to Prevent, for example by establishing new information-sharing and advice structures with external Prevent partners, and by placing more emphasis on additional measures they may enact to mitigate the risk of radicalisation whilst allowing controversial speaker events to go ahead.

5.1.3.1. Universities which have not altered its structures in response to Prevent

Universities A, B, H I, L and P do not provide any evidence that their structures have been altered to comply with the Prevent duty. Their external speaker policies and procedures maintain that certain events that are deemed 'controversial' or likely to allow for the expression of illegal views have to undergo a specific application procedure. Senior university members gather

information on the speaker in question and either decide to let the event go ahead without reservations, to impose certain 'mitigating conditions', or to deny the event request. University P explicitly acknowledges that they are subject to a 'new requirement' under Prevent: when the University decides that an event will go ahead in line with their effort to uphold freedom of speech, 'but the views likely to be expressed are "extreme", then the University must ensure that the views are challenged directly at the time, if necessary by insisting on alternative "spokesmen" in the room'. At the same time, the University explicitly declares that their code of practice on freedom of speech and expression 'has always had a section on managing external speakers' and that they already relied on a variety of measures to mitigate tensions arising from the expression of controversial views before their legal obligations under Prevent. University P therefore offers an example of a university that has integrated Prevent into existing structures, while at the same time placing increased emphasis on mitigating conditions in response to Prevent.

In a similar way, University B's risk assessment notes that the University already had 'comprehensive policies and procedures for events in place' prior to Prevent. At the same time, they also reveal that they have expanded the role of their 'Free Speech group' in establishing 'principles and practice in respects of limits of speech', and that the duty required them to carry out 'extensive briefing and training of most staff involved in event planning'.

University H explicitly highlights that 'it is the responsibility of the event or activity organiser to ensure that they have read and understood the University's External Speaker policy and approach to the Prevent Duty'. However, as pointed out in §5.1.2 above, it remains unclear whether University H's approach to the Prevent duty is to prohibit the expression of legal extremist views in response to Prevent. The policy documents also do not disclose what happens if the initial assessment raises concerns that the speaker may express legal extremist views. Finally, the University does not clarify whether they allow such expression, nor whether they would apply any additional conditions to mitigate the risk of radicalisation if the expression of legal extremist views *was* permitted.

In a similar vein, University M does not explain in detail how their responsibility to have due regard to the need to prevent people from being drawn into terrorism impacts their external speakers and events procedures. While the University declares that they have structures 'in place for managing and mitigating the risks relating to External Speakers', they do not outline what these structures are and how they relate to Prevent. Interestingly, the University's risk assessment initially considered the risk posed by 'events involving speakers who promote extremism and terrorism' as 'high'; however, now that 'appropriate arrangements including controls are resourced to support events', the risk is considered as 'medium'. Their control measures are mainly focused on ensuring the physical security of attendees. They involve relying on 'Security

Industry Association trained Doorsafe Staff, Trained First Aiders, and Reception Porters/Security Services'.

5.1.3.2. Universities which expanded their structures in response to Prevent

All other universities have made more explicit how their external speaker policies and procedures relate to Prevent. Like the above universities, University D requires an application 'in all circumstances where the event is likely to raise issues which may be controversial in some way'. They added that 'this procedure will not normally apply to regular University-organised teaching or seminars and/or debates'; however, they now require staff members to 'submit an application to the University for consideration and formal approval' in cases 'where such a teaching or research event involves a controversial or potentially extremist speaker'. The University further points to their array of 'control and arrangements for higher-risk events'. However, University D introduced the 'consultation with appropriate third parties, including the Regional Prevent Officer' as an additional means to mitigate the risk of radicalisation on campus. This implies that the University has expanded its structures in response to Prevent, not only by imposing new requirements on their staff members, but also by relying on the advice of their RCs on how and when to rely on supplementary control mechanisms.

University O declares that it has 'procedures for the approval of events/external speakers which reflect the Home Office's Prevent duty guidance'. For this, the University has developed a 'flow chart', where 'bookings of potential concern are referred' to senior staff members for approval. As opposed to University D, University O does not explicitly require staff members to apply for formal approval of their events, because 'visiting/guest lectures arranged as part of module teaching are considered to be low risk, as the subject matter could be relevant to the subject matter of the course'. Although the University does not disclose whether the process of vetting external speakers has changed in response to Prevent, they note that they may rely on additional measures that may be put in place in order to manage events involving 'controversial speakers and or topics' in order to meet their safeguarding responsibilities under Prevent.

University K revealed that in response to Prevent, they have introduced training on freedom of speech, which is mandatory for 'staff who may request a speaker, or are involved in the booking of speakers'. The University further declares that the Prevent duty 'obliges the University to have a speakers and events process' that assesses the risk associated with invited speakers. While most events that are booked for academic purposes do not raise concern 'and can be booked without further referral', the risk assessment also 'identifies whether a concern could be perceived with regard to the Prevent duty'. In the cases where concerns are identified, 'a documented risk assessment should be completed' with the aim of learning about 'the context

and reasoning behind the request for the speaker, and any managing actions in place to mitigate risks'. Interestingly, the risk assessment does not only include the risk that 'the speaker has a track record of extremist illegal views', but also the risk that the 'topic is likely to convey extremist/illegal views'. This further confirms that the University has expanded their risk perception in order to include legal extremist views. The University sees the risk assessment as 'an opportunity to explain why it is important that topics that may cause a concern when taken at face value are discussed', and enables them to decide whether they will 'request that additional controls are put in place to mitigate the risk'.

Those controls resemble those of the other universities and range from electing experienced academics as event chairs, requiring the speaker to reveal the content of their presentation prior to the event, arranging a meeting with the guest speaker to agree on an event protocol, and requiring the speaker to sign the speakers' code of conduct. In addition, the University may be satisfied that the event can proceed if 'the speaker has been invited to explore different perspectives and will form part of a balanced debate', or if 'the speaker was previously involved in extremist or terrorist activities, but withdrew from that and has been invited to share their experiences'. This is a particularly illuminating example of a situation where a university's heightened awareness of the risk posed by legal extremist views does not lead them to curtail such speech. Rather, their mitigating activities are portrayed as a way to uphold freedom of speech under Prevent.

Like University D, Universities E and F have developed information-sharing mechanisms with their 'Regional Prevent Coordinator and/or the Local Authority Prevent Coordinator', in order to share concerns that the speaker might make statements that could draw people into terrorism, that the speaker has made such statements previously, or that the speaker is linked to proscribed organisations.

University G 'reserves the right to require' that an external speaker submits the proposed text of their speech in advance to enable the University to evaluate whether 'any special arrangements are required' so as to 'facilitate free speech', and to examine whether 'there is a real risk of an infringement of the law'. The University's risk assessment further adds that 'the Secretary for Council provides updates' to the Prevent Lead 'on any visiting speaker that has been flagged as potential risk, and approval on how to best mitigate the risk'. So while the policy document does not reveal that the mechanisms related to external speakers were developed in direct response to Prevent, the action plan discloses that the University has developed additional structures to share information on extremist speakers and to seek consultancy from their RC.

University N has mechanisms in place that enable them to consider applications in cases that could lead the University to breach its obligations, which include the CTSA 2015. The

University explains that their Registrar has the power to decide whether the University approves any particular external speaker request. University N further notes when making decisions that are related to Prevent, the senior officer, 'shall consult with such other staff and/or authorities external to the University' which include the police and the HE Prevent Coordinator, an approach that is similar to that of the Universities D, E and F. They further add that 'an acceptance may include such requirements on the event organiser as seem necessary and proportionate', which resemble those outlined by the other universities. Again, those measures were likely not developed as a result of the CTSA 2015, but are rather in an effort to manage all sorts of controversial speaker events on campus. Those measures were then likely highlighted as existing resources to meet their obligations under Prevent.

University J's risk assessment and action plan explains that in addition to existing structures that allow the University to vet external speakers before they approve events on campus, they have developed novel approaches to conducting background checks on proposed speakers. While their policies 'require that the external speaker's background is carefully researched via Google searches and other relevant websites' to make sure 'that the speaker does not have any links to proscribed organisations', they have also strengthened their existing 'arrangements for sharing information about external speakers'. Although they find that 'the majority of external speakers are considered low risks', they now 'seek advice about external speakers from our Muslim Chaplain and our Prevent Partners', for example 'via the Association of University Security Officers, the HE Prevent Lead, the Local Authority Prevent strategy group, the local CTU, Students' unions, and networks with other Prevent Leads in other universities'.

Overall, the seventeen universities' documentation on free speech and external speaker events suggest that universities are predominantly relying on the risk assessments and mitigating measures that they already had in place prior to Prevent in order to deal with controversial speakers and topics. In fact, it appears that the approach of several universities to allowing events involving extremist speakers has not changed at all in response to Prevent. Another group of universities seems to have expanded their existing structures in order to meet their new legal obligations. In this context they have highlighted the central function of external information-sharing processes that facilitate the identification of potentially extremist speakers. Those cases suggest that some universities now have a more rigorous approach to vetting external speakers than they had prior to the duty. Several universities also highlighted their array of additional measures as a resource for mitigating the risk of radicalisation, although it is not clear whether these institutions relied on such measures prior before 2015, or whether they established such mechanisms in direct response to Prevent. None of the universities' policies and codes of practice allow room for speculation into how and whether Prevent has impacted on their approach to

external speakers on the ground. However, Universities A, B, and H provided additional information in the form of their annual OfS returns and self-evaluations.

5.1.3.3. Preliminary insight into universities' on-the-ground enactment

University B's annual return emphasises that they have hosted 'a substantial number of' events that 'touch on controversial issues in current world affairs', and that the University's 'experience of striking the right balance between upholding our legal obligation to enable free speech on campus while remaining within the law and respecting other relevant legislation is extensive and long predates the statutory Prevent guidance'. They confirmed that 'in practice the introduction of the statutory guidance required no substantive change' to the University's 'existing procedures for the risk-assessment and planning of events and for the mitigation of the risks around events likely to prove controversial'. Since the enforcement of the Prevent duty in 2015, only 'a handful of event proposals' were 'escalated to the first level of management oversight for possible consideration under the Prevent duty'; moreover, 'in all cases it was rapidly found that no Prevent concern was in play'.

University B also noted that one particularly controversial event 'became disrupted by sections of the audience arguing against others', which led to external parties 'claiming that we had failed to implement our duty under the Prevent guidance'. The University subsequently 'reported the issue' as part of their annual return in the 'expectation that a complaint to that effect would be made' to their regulator. However, they also maintained that 'at no point had the Prevent duty come into play'. That event inspired the University to 'strengthen the risk-assessment and planning of events in order to ensure good order and mutually respectful debate at events', and to instruct 'a small circle of staff experienced in risk assessment… to spot and flag any risks not already identified'. Although this is reflected in the University's Prevent-specific risk assessment and action plan, the University maintains that this was 'not introduced for Prevent reasons'. Rather, they find that 'as a side effect, the measures will increase further' the University's 'ability to identify Prevent-related concerns in advance and take appropriate action to mitigate them'. This statement reinforces the finding that at least some universities have continued with a policy of 'business as usual', without significantly altering their approach to free speech under Prevent.

In a similar vein, University H's Annual Return for 2018/2019 discloses that no event/speaker request was rejected on the basis of Prevent. However, two events were subject to conditions/mitigations in relation to Prevent. The document does not provide more information about the nature of the events and the conditions the University imposed on them in order to mitigate the risk of radicalisation. Whether the Prevent duty has shaped the

University's approach to relying on additional conditions to allow events to proceed will be explored in more depth in section 5.2.5.

While University H does not provide information about the context in which it has relied on their repertoire of mitigating measures in response to Prevent, University A's internal evaluation provides more insight into the on-the-ground enactment of Prevent in the external speaker area. In line with Universities B and H, the evaluation highlights that Prevent has not made a significant change to their approach to external speakers. It finds that 'no events or meetings with external speakers have been referred to the' University's relevant disciplinary officials, and that 'the university security services are of the opinion that no events have raised any issues with respect to the Prevent Duty since its inception'.

While the author of the report considers this as a confirmation that 'the University has a very low risk of having staff or students being drawn into terrorism', they also acknowledge the possibility of self-censorship under Prevent. The internal review includes the perspectives of several students who expressed their concern that organisers of meetings 'involving speakers who might be labelled by others as "extremist" or "radical" might be identified on some kind of blacklist as extremists', and therefore 'avoid [making] invitations to such speakers'. In response, the review maintains that the University does not have such a blacklist, which indicates that the concerns are not sparked by the University's response to Prevent, but rather by the likelihood that 'national security services may collect data on organisers of such meetings'. At the same time, the reviewer suggests that self-censorship may be exacerbated by the University's failure to inform event organisers that the University has a budget for the costs associated with planning security arrangements. In addition, it adds that in the 'rare cases' where the 'police consider that they need to deploy officers', event organisers 'may find the policing costs prohibitive and chose to abandon their plans'. However, in light of the security service's declaration that no event has reached that level, police costs do not seem to pose a barrier to Prevent-related events. And although the review concludes that 'a combination of self-censorship for fear of being falsely labelled an extremist plus a concern about the possible cost of an event (including security costs) seem to lead to the absence of controversial speakers in general, and those whom the Prevent duty might possibly apply in particular', this does not seem to be a result of the University's enactment of Prevent on the ground.

However, while the University's policy enactment of the Prevent duty does not pose a barrier to allowing controversial external speakers on campus, the review suggests that the on-the-ground approach to room bookings has caused 'some student societies with names like the Palestinian Society or the Islamic Society' to feel 'that they were treated differently as a result of Prevent'. They found that a group of university staff in one of the University's divisions required

the societies to provide 'a list in advance of those persons who are expected to attend', as opposed to just the name of the speaker. While 'such conditions are not authorised in any way by the Prevent duty', the review acknowledges that students understandably interpret such on-the-ground changes as 'deliberate interference with freedom of speech, an attempt to compile a list of students who might be prone to extremism, or simply an act motivated by Islamophobia', which they 'link to the Prevent duty law'. The review finds that 'the practice of asking for list of attendees' that occurred in this context 'was discontinued following an intervention'.

University A's internal review is particularly interesting with regard to the ambiguous impact of mitigating actions on freedom of speech under Prevent. While some universities have framed such mitigating conditions as enablers of free speech and balanced debate, the document suggests that when enacted on the ground in response to Prevent, they can be perceived as *barriers* to free speech. A review of all other universities' policy documents confirms the possibility that the costs associated with mitigating conditions may pose a barrier to free speech under Prevent. Only two universities explicitly declare that they are willing to contribute to the costs associated with any mitigating conditions: University B informs event organisers that they 'will in principle be required to meet the cost of conditions required', although the University 'will always endeavour to help from central budgets if funding is unavailable'. In contrast, University C states that 'the university secretary normally requires event organisers to meet any reasonable cost incurred as a result of any special conditions or arrangements required by the University secretary', and one of University N's requirements for the 'acceptance of an event' states 'that the organisers cover the cost of additional security arrangements'. Like University A, none of the other universities declare whether they have funds available in order to assist event organisers to meet the additional conditions the University may impose in response to Prevent.

5.1.3.4. Conclusion

My analysis of universities' freedom of speech policies and code of practices and procedures related to events involving controversial speakers suggest that Prevent has not significantly impacted on most universities' existing structures. However, it also suggests that universities have different opinions on whether the CTSA 2015 has placed additional limitations to free speech, particularly with regard to whether they are expected to curtail legal extremist expression or not. While universities' use of mitigating conditions in response to Prevent has the potential to enable freedom of speech and controversial debate, it may equally pose a barrier to the realisation of such events. In practice, it may be possible that universities have engaged in the securitisation of legal extremist expressions, which may be reflected in their efforts to restrict events that are likely to feature views that are now considered as a potentially dangerous influence on their staff and

students. §2.5 will therefore engage in an in-depth exploration into Prevent Committee members' approaches to managing events involving extremist speakers.

5.2. PREVENT IN PRACTICE: ACTION AND CHANGE ON THE GROUND

5.2.1. Challenging the threshold for legal compliance

The interviews with Prevent Committee members provided fascinating insights into the way in which universities have enacted Prevent in the external speaker area. In particular, my participants displayed a wide range of different attitudes and understandings regarding their obligation to protect their university members from radicalising influences.

For example, the interview with P.A, who earlier disclosed that their university is particularly rejecting of Prevent, considered the responsibilities they ought to assume in relation to external speakers as '*inconsistent with the University's obligation to protect free speech*'. P.A explained that '*the problem is that nonviolent extremism, the concept as it's developed in the legislation, can include the expression of views which may be outside the political mainstream, but which are not unlawful to hold*'. Their understanding of what their legal obligations under Prevent are '*intended to achieve*', is that their aim is '*to target some speech and actions which are perfectly lawful*', and that '*this is exactly why you shouldn't have a Prevent duty in a university*'. According to P.A, their University held the view that '*controlling speech in that way in the University*' was not only '*inappropriate*', but also '*deeply damaging to the whole idea of what a university is*'. P.A's effort to resist the securitisation of legal expressions led them to use their legal expertise and high-profile public position to lobby for changes to the CTSA 2015 before it passed legislation: '*we noticed that the government hadn't taken into account a clause in the 1986 Education Act, which requires universities to uphold free speech for both people who are members of the University but also for visiting speakers*'. Although this led to the proposition of a parliamentary '*amendment to remove universities from the Prevent duty altogether*', P.A quickly realised that '*that wasn't going to succeed*'. Consequently, they campaigned for '*a further amendment saying that when applying the Prevent duty, universities should do so within the context of their overarching duty to protect free speech*'. This amendment was accepted by the government '*and that really changed the whole scene, changed the Prevent duty in the university context*'.

For P.A, this outcome meant that they were able to '*apply the Prevent duty strictly within the context of existing rights*', an approach that is reflected in their University's free speech polices. At the same time, P.A observed that even after the introduction of legal amendments that require universities to uphold free speech when complying with Prevent, there is '*disagreement about the bare legal minimum*'. As they explained: '*When I say it is acceptable as long as it's lawful speech, some would disagree and say "Actually Prevent still requires you to control speech more strictly than that. It still*

requires you to control some speech that is legal, in other words, nonviolent extremist speech"'. In turn, P.A acknowledged that their University's implementation of Prevent may technically not even meet the standards of the bare legal minimum: '*saying that it is consistent with Prevent to have a policy which says that any speech which is lawful should not under any circumstances be controlled is quite a controversial view*', adding that '*while it's the policy of the University, whether it would withstand serious legal scrutiny is another matter*'. At the same time, P.A found this interpretation to be the only feasible option for the University in order to resist the securitisation of legal speech. They refused to consider the expression of non-violent extremist views as a potential danger that universities ought to restrain for the sake of their students' and staff members' safety, which is '*why we have to interpret Prevent in the way I suggested*', even if '*it was questionable legally*'.

Interestingly, P.A explained that their institution was able to resist full acceptance of the Prevent duty's focus on legal extremist expression because of their low risk profile and their high level of institutional autonomy. As they put it, '*the government, the OfS, has never really challenged our interpretation of Prevent, even if we weren't really complying with their external speaker requirements*', and that '*the reason they haven't is because they know we'd make a fight of it*'. They further explained that '*it is important to realise where the power lies*': because universities are granted the discretion '*to assess their risk and to take a risk-based approach based on their own judgement*', P.A considered their University to be in a position where they could decide autonomously how they would implement Prevent in their own context. As they put it:

> *If the OfS comes to me and says "I think that your Prevent duty is too weak or overly subject to existing rights", I'd say "Don't tell me what to do. It's for me to assess the risk. I'm telling you that there's a very low risk here regarding extremist activity. And this is our response. So if you've got something to say about it, I'll see you in court".*

This statement suggests that universities with a low (perceived) risk of radicalisation may be granted more autonomy in their enactment of Prevent, even if they deviate from the statutory guidance. At the same time, P.A told me that the autonomy associated with universities' responses to Prevent goes beyond mere risk perception:

> *It's a classic British thing. You've got your posh universities and you've got your scuzzy universities. So Universities like University O, where they traditionally had all sorts of issues and problems, they would probably threaten to close them down. If they had an Islamic society that kept holding meetings about ISIS and so on, and the University lets them, I think the government would probably send in a task force or threaten to close them down. But if we had meetings here where somebody*

was talking about ISIS and I'd say to them [the government] *that we are interested in extremist movements from an academic perspective, they would back off.*

5.2.2. Integrating Prevent within existing structures

As opposed to P.A, P.B1 did not have any problems connecting their new responsibilities under Prevent with their already existing approach to managing external speakers. While their policy statements suggested that the University had difficulties aligning their institutional values with an understanding of Prevent that limits legal free speech, the interview revealed that this did not pose a significant issue in practice.

In line with their policy statement, P.B1 reaffirmed that '*we run a lot of public events that are quite controversial*', and consequently, the University has '*already got quite an established risk assessment scheme in place*'. In practice, this meant that integrating Prevent into their external speaker structures '*didn't take much tinkering*', and that '*it wasn't too difficult to fit Prevent into*' their existing approach. In order to illustrate the robustness of their existing mechanisms, P.B1 drew on one incident they had managed in 2014, '*before all the guidelines came in*'. On that occasion, the participant '*received an email from somebody who wasn't a student here, who said that a speaker who was invited by the Islamic society was an extremist*'. The email included '*some YouTube videos of the speaker*', which P.B1 judged to be '*unacceptable*'. Consequently, they decided to inform the Dean, '*and we asked the student who invited that speaker to come and see us, and we showed them the films and they were mortified and said "obviously we don't want him here"*'.

Drawing on this example, P.B1 explained that they decide whether to allow an event involving external speakers to proceed in dialogue with their students, and that '*on the whole I'd say that I really do have confidence in them and in the culture that we have created here*'. And although the University did not struggle to connect their duties under Prevent with their existing structures, both P.B1 and P.B2 supported P.A's rejection of the government's emphasis on non-violent extremism. P.B2 explained that '*I understand that 99 per cent of Muslims in this world think that homosexuality is wrong, and is sinful. I don't agree with that, but I also don't think you can take this view as extremism. I mean, that's just mainstream Islam, mainstream Roman Catholicism*'. They rejected the tendency to perceive of such views as a potentially dangerous security risk, and considered '*the fact, and the government is quite clear about this, that an opposition to gay marriage could be an indication of someone who needs to be referred to Channel*' as '*absolutely disgraceful*'. P.B2 acknowledged the difficulty of drawing a line between non-violent extremism and religious conservatism, and in turn, the University does not consider either inclination as a sufficient reason to prevent an event from proceeding: '*We recognise that people's faithful adherence to ancient global traditions will mean that they hold views that don't look very palatable in a secularised liberal West. And that's okay. We*

have to acknowledge that'. P.B2 dryly noted that '*You can't shop around the world for international students who have proved to be the cash cows that are running our institutions, and then recoil from the fact that not everyone has liberal Western views*'.

P.B1 added that '*there are a lot of misconceptions around how we have to act in line with Prevent*', and referred to the incidents that the University described in their annual Prevent return: '*there have been times when we had incidents on campus that were unacceptable for whatever reason, that crossed certain lines that we need to address in other* [non Prevent-related] *ways, but we are not talking about terrorism. We are not talking about radicalisation*'. They elaborated that they '*had a difficult meeting with the Board Deputy of* [redacted]*, they were directly challenging us about events that were happening on our campus, saying that they were against the law because of Prevent. And they simply weren't*'. P.B1 stated that their legal obligation under Prevent was not to prevent controversial debates, and while '*some events shouldn't be happening in a certain way*', they also believed that '*it's not about Prevent, but about campus culture and about how we shape that culture*'. While their university made sure that their implementation of Prevent did not lead to the infringement of free speech within the law, P.B1 also reported that one major difficulty associated with the duty is that '*there has been a desire to use the law to leverage change on issues that don't really have lot to do with terrorism*'.

Like P.B1, P.E pointed out that '*I don't think I've spoken to anyone who thinks that the guidance is particularly helpful*', especially in light of '*the statement that we can only allow speakers to speak if we can completely eliminate the risk of being drawn into terrorism*'. They found that '*you can never remove all risk, you can never guarantee that*'. In turn, University E has '*taken a very pragmatic approach, which is to reduce the risk to an acceptable level, recognising that you can never get to zero risk*'. Nonetheless, P.E had a much less critical opinion about Prevent than P.A, explaining that '*while there is a lot of talk about Prevent being used to stop speaking*', they are '*not sure that there is a lot of evidence that that's actually true*'. They declared that '*looking at each individual speaker request and identifying where there might be concerns*' is an approach they already assumed prior to Prevent: '*we see it as something that's relevant across the board and not only in relation to extremism, we always had to have those conversations about where the limits of freedom of speech lie*'. They again pointed out that '*the guidance is really unhelpful*', particularly '*when it comes to drawing a line between conservatism and extremism*'. P.E explained that in their view, '*there is a difference between expressing views that support or espouse terrorism, and those that are opposed to Western liberal views*', and that Prevent has not changed their approach to allowing the '*expression of legal controversial views*'. They emphasised that '*we as an institution would absolutely want to support freedom of speech. Look at the debates around Brexit. There are all sorts of views which don't put people into a radical space in terms of* [being] *"at risk" of terrorism. Not everybody who is pro-Brexit is at risk of right-wing radicalisation*'. Rather than engaging in the securitisation of legal controversial views, they aimed '*to challenge extreme views by holding*

them up to scrutiny'. Like P.B1 and P.B2, P.E highlighted the importance of '*being very clear what our institutional values are and how that relates to the behaviour we expect from people who come here*'. This '*doesn't mean* [that] *you can't express a different view*', but that their focus lies on '*the way in which you treat people*'. Like all above participants, P.E reiterated that the University has not changed its approach to allowing legal controversial debates in response to Prevent, and that they continue to draw a line between legal and illegal expression.

P.G1 and P.G2 admitted that despite their leading role in their University's Prevent Committee, they '*are not involved in decisions around extremist speakers*'. To the best of P.G1's knowledge, their university '*have had formal referrals of probably more Islamic speakers in the last year or so*'. However, they were under the impression that '*there have been more problems with right-wing speakers*'. While they were not sure about the exact procedures at their university, P.G2 was able to tell me that '*the council secretary is responsible for the background checks on people who are invited to speak*', and that '*it's on them to make a judgement*'. P.G1 assured me that they '*set a very high bar; they've got to be really convinced that there's a real threat for them to ban anybody*' and that '*that hasn't happened*' in response to Prevent.

P.G3, who was appointed to the University's Prevent Committee because of their '*expertise in human rights and civil liberties*', explained that they were acutely aware that '*Prevent can be interpreted in a very heavy-handed way*'. However, their '*university treats it with a very light touch*', which is why P.G3 '*do*[es]*n't think it* [Prevent] *is very controversial* [with regard to their specific university context]'. At the same time, they added that their '*light touch approach*' was the result of a conscious effort, not least because P.G3 had actively challenged the advice they had received from their RC. While their policy document suggests that the University may rely on their RC's advice regarding external speakers, P.G3 highlighted the complicated nature of that relationship in practice. They told me that the RC came in to give advice on external speaker policies where they '*explained that someone from Extinction Rebellion was invited to a campus and was training students in how not to answer questions that the police asked them if they were arrested*'. The RC told University G's Prevent Committee: '*what you don't want is Extinction Rebellion telling your students this. You don't want to be inviting speakers like that. Because they are really encouraging them to break the law*'. In response, P.G3 '*had to tell* [the RC] *that the first thing I would say to my client as a lawyer is "say absolutely nothing when the police questions you". That doesn't make me an extremist*'. In the view of P.G3, the RC '*was suggesting that members from Extinction Rebellion were extremists and that they were encouraging people to break the law, and I said "No, absolutely not"*'. They '*really challenged the RC, and actually refuted them. It is completely legitimate for people to come to campus to talk to students about how to resist police questioning. That's completely legitimate, and it's about freedom of assembly, freedom of expression, and freedom of protest*'. Furthermore, P.G3 ensured that other members of their

committee were aware '*that these are the fundamentals of what a university is about*', and that '*we want to train our students to be able to engage in debate*'. Having experienced the debate between P.G3 and the RC, the Prevent group '*decided we wouldn't change our policy on external speakers*'. At the same time, P.G3 admitted that '*we haven't yet got a policy on academic freedom*', and although '*overall the University is pretty robust in defending freedom of speech*', they did not know whether the individuals in decision-making positions had changed their approach on the ground in response to Prevent. For example, when I asked P.G3 whether the University would allow members of the controversial [yet legal] CAGE organisation to speak, they responded '*the honest answer to that is I don't know*'. To the best of their knowledge '*nothing got cancelled under Prevent*' so far.

While University I's policy documents considers external speakers and events as a key area of their Prevent delivery, P.I found that their institution's procedures were, and had always been, predominantly developed to reinforce their previously existing duty to uphold freedom of speech. The University '[*has*] *a highly developed process around external speakers on campus, because what we want to do is basically not shut down any kind of discussion so long as it's within the law*'. The University '*asks the faculties themselves to do a risk assessment and put forward people they think might be particularly risky*', and if they '*need to do any further assessment, we can follow that up internally with our security team*', who '*are connected to a range of different intelligence-gathering structures*' which have always included the police, but now also extend to '*external Prevent partners*'. However, the University '*rarely use*[s] *that line*'; rather they '*do a lot initial Google searches*'. Moreover, their speaker risk assessments are mainly focussed on assessing whether the event could pose a risk to their freedom of speech principles, and not on whether it constitutes a risk of radicalisation.

For P.I, controversial speaker events are primarily '*difficult because you've got people on both sides of the equation who've got very strong views around this, and at each point they are trying to stop the other person from saying something that they find offensive or threatening or difficult*', and that this problem persists '*regardless of whether the views are inside or outside the law*'. While University I's policy did not explicitly engage with this, P.I clarified their '*view is that if* [the views/expressions are] *inside the law, we need to provide space for* [the free expression] *to be able to happen*'. They reiterated that '*we have a Prevent duty, and we have freedom of speech*', which means that '*what we need to do for our students going forward as citizens of the world, is to get them used to the fact that they're going to go into environments where people hold lots of different views*'. As a university '*you can't shut everyone's view down because if you do so, you end up oppressing*'.

P.I explained that the University '*do*[es] *a lot of mitigations beforehand*' which '*can take various forms, from counter-events, to preparing a specific set of questions in advance so the meeting is less explosive*'. Interestingly, they do not primarily serve the aim of protecting students from controversial views, but are rather designed to ensure that the event adheres to their freedom of

speech principles. For P.I, the problems associated with their mitigating activities are not related to Prevent, but rather to the fact that '*event organisers sometimes get very agitated when you want to make sure that there's a counter-narrative to their event*', and that they '*have had that before, for example with Jewish students trying to shut down Palestinian students' events and vice versa*'. In recognition of such frictions, '*our speaker policies are specifically designed to manage that tension, to reduce it down to the minimum, so people feel that they've been heard, that they don't feel like their freedom of expression has been stifled*'. And although University I's effort to uphold freedom of speech for all groups involved in controversial events is not at all a direct response to the Prevent duty, P.I found that upholding freedom of speech '*is part of reducing the tension, the vulnerability, the sense of grievance by giving people a voice*' and that their mitigating procedures thus do not only function as enablers of free speech but also as safeguarding measures to protect students from vulnerabilities that could in turn render them susceptible to radicalisation.

P.M emphasised that their university is '*happy to facilitate and accommodate any event that may be contentious*', but that they '*are also keen to make sure that we provide a safe environment for that debate to take place*'. University M usually has mitigations for controversial events in place in order to ensure that '*the panel and the audience represents all areas within the university community, so that we're maintaining a balanced panel and platform*'. If the event involves '*a contentious speaker, what we've said is providing they don't break the law, they can have a sensitive and contentious debate. But we make sure that there are provisions in place to safeguard that space*'. P.M was '*clear that we will not disadvantage any particular group and that all groups are represented and have a say on whatever that particular topic is*'; for them, '*that approach has worked really well*'. The '*restrictions we've been putting in place involve adding additional security or having ticketed events to make sure that only members of the university community attend*'.

At the same time, P.M highlighted that their mitigations are *'mainly about managing the facility as opposed to managing Prevent*', adding that '*some mitigations are more general safety measures put in place for any sort of event, regardless of whether it's a Prevent-related issue or not*'. This statement corresponds to University M's policy document, which highlights that their control measures are primarily focused on ensuring the physical security of event attendees, and not a direct response to the University's safeguarding responsibility under Prevent. P.M also clarified that the only reason for them to reject an external speaker and/or event application would be on the ground that the '*external speakers are part of a proscribed group or organisation*', because allowing them to speak '*would mean we're effectively breaking the law*'. Their institution's attitude towards controversial speakers did not change in response to Prevent, which they proved by inviting a '*former detainee from Guantanamo Bay to come in and speak*'. They '*were able to manage and facilitate that*' by '*explaining to him prior to going on stage that he wasn't allowed to break the law, to use any*

inciteful language or terminology'. They also '*ticketed that event, had a bag search to make sure no unauthorised things were being brought into the meeting*' and '*recorded the event*', which '*they made clear to everybody so that we were able to demonstrate that we'd taken all reasonable precautions in the management of that event*'. P.M reported that '*the event went without any issues*' which '*comes back to our fundamental approach to say "no is the easy answer, but not necessarily the right one"*'.

P.M admitted that allowing controversial events became '*more difficult*' since the enforcement of the Prevent duty, '*but if we can say "yes" and support something, regardless of the sensitivity of it, we will provide a safe space for that to take place*'. University M's approach towards external speakers has not changed under Prevent: '*providing it's not illegal and not likely to incite racial tensions or break the law*', they don't prevent events from proceeding. P.M further told me that their '*approach to make sure that all interested parties are represented so we don't disadvantage anybody on the panel or within the audience*' did not emerge as a response to Prevent, but formed part of their University's wider principles around free speech. They added that the only significant change in response to Prevent related to their '*increased paperwork*', as '*anything that we deemed to be of a sensitive nature or may link to Prevent*' requires them to '*produce a report and give an overview of that*'. They revealed that in 2019, they '*had five meetings that were deemed to be "special meetings status"*', and which in turn *'required additional management controls in place*', but that '*only one was borderline Prevent related*'. None of the events the University ever declined '*was a result of Prevent related issues*'.

5.2.3. Expanding existing structures through external partnerships

P.D noticed that there is a tension resulting from the lack of a '*proper definition of extremism*', especially now '*that one of the definitions that we have includes vocal opposition to democracy*'. Like several of the participants discussed above, they noted that opposing democracy '*is arguably a legitimate academic stance*', and found that '*the Prevent legislation isn't well written*' because it relies on a vague definition of extremism. While they held the view that '*it isn't perfectly implemented either*' across many institutions, they thought that '*we do it in a sensible way*'.

Although P.D agreed with P.A's criticism of Prevent, their institution's on-the-ground response differed significantly. While University A did not change their way of dealing with events, P.D developed a new approach to vetting prospective speakers in response to Prevent. It will be recalled that University D's policy document already revealed that the University now relies on advice from their RC. P.D further disclosed that they '*now use a security consultancy called Horace to do a profile on speakers if needs be. They are using open source material*'. The decision to outsource the data gathering is '*something another university in the area did and we adopted*', which '*means that we've got consistent information and we're making a judgement on that consistent data*'. They

added that '*it gives us credibility*' when making decisions about events involving external speakers. P.D elaborated that they felt that in their region, '*we have a unified approach to Prevent; we talk to each other*'.

Like other participants, they also maintained that '*we had an effective sensitive speakers process long before the legislation came in*', and that '*we have never not hosted a speaker here; as of today, we never turned down a speaker*'. The University '*will put conditions in place around security and safety and so on, but we hosted controversial speakers after Prevent. We went through risk assessments and shared our due diligence with HEFCE*'. The University continued to '*follow the liberal principles of this institution*', but P.D also observed increased '*political pressure*' around hosting extremist speakers following Prevent, especially because early on, universities were encouraged to cancel events if they felt that they could not fully eliminate the risk that people may be radicalised by the views expressed. P.D reiterated that '*the initial guidance was nonsense*' because '*you can't mitigate all the risk*'. Consequently, they just decided to '*ignore the guidance*', and to continue managing controversial events – including those involving extremist speakers – in the same way they had before: '*for us, we didn't do anything different in this area as a result of Prevent*'.

5.2.4. Improving free speech in controversial debates under Prevent

There were some institutions who seemed to have improved their efforts to uphold freedom of speech as a direct consequence of their Prevent duty. P.C reported that in response to Prevent, their University '*went back to our freedom of expression policy and updated that in light of the statutory duty*'. They recognised that '*that was a bit of a political hot potato*' because the statutory guidance had received a lot of criticism, and to ensure that their response was adequate, they '*got a lot of input from academic colleagues in that space, about defining what we meant by freedom of expression and kind of getting a sense of what was sensible to us and what wasn't*'. While their policy documents do not reveal whether the University had altered their existing approach to external speakers under Prevent, the interview showed that in response to the duty, University C choose to '*take the decision-making around particular events not just to one person having to say whether something should go ahead*'. Rather, they '*set up a free speech group*'. Now, when P.C gets '*requests for really controversial speakers to come in, it's no longer just me discussing this with the VC and coming to an agreement*'. As a result of Prevent they '*now get a view from the free speech group which involves academic colleagues and when necessary members of the student union, to reach a consensus*'.

P.C also disclosed that their approach to decision making around controversial speakers now benefits from advice from their RC, whom they considered as '*really, really helpful*', because '*the controversial speakers have often spoken elsewhere, and they* [the RC] *will know about that. So that helps you to get a sense of the problem, if there is a problem. And the Regional Coordinator tells you about*

the mitigations that other universities have put in place that might work, that kind of thing'. P.C thought this '*a much better way of dealing with* [controversial speakers]', and even found that it enabled the University to develop a much more rigorous approach to protecting freedom of speech. They always took the view that '*as long as the views you express are legal, you're not going to incite hatred, or encourage people to violence or anything like that, you can pretty much debate what you want*'. In turn, '*we've never, ever – and I say this proudly – turned anyone down since the implementation of Prevent. In all the time I've been here, I haven't told anyone "you can't come and speak"*'.

Like P.B1, P.C also explained that their previously established structures around external speakers were well suited to accommodate Prevent: '*we will do a background check. It's nothing exhaustive, sometimes it's blindingly obvious that the person's going to be controversial but some of them could get under the radar*'. Following the background check, the University's communications team '*either say*[s] *they look all fine, or that with this person, there have been issues here, there, and everywhere*'. So if they '*think somebody is going to be controversial, we get students who have invited them to complete a form with questions that we then take away and consider. We talk to security and talk to the police and evaluate if the event can go ahead safely*'. Following that initial risk assessment '*we run it by the free speech group, and then ultimately I make a recommendation to the university secretary about whether or not it should go ahead*', reiterating that '*so far I've said "yes it should go ahead" every time*'. P.C elucidated that they always had mitigations in place, which involved requiring external speakers '*to sign a code of practice, or we might require them to send a copy of what they are going to say in advance, that kind of thing*'. But they also added that they '*never really had to do that* [introduce their mitigations] *because of Prevent. But that's the kind of thing that we could do if there was a very risky event*'. Being able to rely on a set of mitigating activities to deal with controversial speakers '*meant that we could easily show how we comply with the Prevent requirements*'. When I asked them if they had had cases where speakers did not turn up because the mitigations made it unfeasible, they told me that '*people have retreated because we've asked them to sign our institutional principles and they threw a bit of a fit and said "no I can't possibly do that"*'. But they also clarified that this was '*around a transphobia debate and not related to Prevent*'.

The interview with P.C was particularly interesting because it not only suggested that their University was able to integrate the Prevent duty into their existing structures without compromising their freedom of speech principles, they also uncovered that they had developed a more rigorous approach to enabling controversial debates as a result of their enactment of Prevent. P.C emphasised that dealing with Prevent allowed them to '*define free speech in a way that we'd never actually really defined it before*'; in doing so, they were able to '*benefit from the expertise of our academics from the school of government and international affairs*'. It is also notable that as opposed to P.A, P.C's increased attention to free speech was not a sign of their rejection of the Prevent

duty. They were aware that the majority of University C's academics were critical of Prevent, but they also observed that they '*were less interested in the Prevent duty itself, but more in the government ideology, you know, what the government is trying to do*'. This meant that their criticism did not lead to serious conversations about compliance. P.C considered their academics' critical input as '*a really helpful side contribution*', but also insisted that '*we're not gonna fight this thing* [Prevent] *off, it's a statutory duty. We can't be a university if we don't do it*'.

This approach stands in stark contrast to that of P.A, whose university's increased focus on academic freedom and free speech was born out of their academics' strong rejection of the government's effort to securitise legal speech. In contrast, P.C told his colleagues that the University's Prevent committee '*isn't really a space to fight this* [Prevent] *off*', but rather a platform to '*respond to it in a way that is appropriate to the University and proportionate to the risk we face, which we're told is very low. So we don't wanna be chucking huge amounts of time, effort, money, people, staff resources to this*'. While P.A considered their institution's low risk as a leverage for testing their threshold for compliance, P.C perceived their low risk as a reason not to challenge the duty: '*If the risk is low, we should just build it into what we do anyway*'. However, both participants adopted the same overall approach, in that neither of them were willing to compromise on freedom of speech within the law as a result of Prevent.

As opposed to the participants from University G, P.H had a more nuanced understanding of their University's approach to managing events involving speakers affiliated with organisations like CAGE. They explained that '*it would depend on the event, what they wanted to talk about, how it could be managed*'. P.H's primary consideration would be to '*provide a balanced platform*', and that the specifics of this '*would depend on whether the event was run by a department or by the student union group*'. In accordance with their external speaker policy, '*the first application gets picked up by the events team and they look at how we can get the opposing group to provide a counter-narrative, rather than just providing a platform for one person*'. Their mitigations were mainly focused around '*getting both sides*' of the argument heard, because the University '*would never put one controversial organisation up on stage and just let them talk*'. Rather, they '*would make sure we've got all the different representations that provide balanced platforms*'. So '*if it was the view of the University that we could manage that safely and that it wouldn't cause security issues, then potentially yes, it would go ahead*'. In line with most other universities, University H had procedures for mitigating '*higher risk events*' involving controversial external speakers prior to Prevent. However, they also expanded their activities under Prevent: '*the events team now reports back to the Prevent Group every quarter, to provide a really comprehensive list of all the speakers, what the purpose is, and then if there were any mitigating factors put in place*'.

P.H also explained that the University benefits from increased information exchange around external speakers as a side effect of the Prevent duty:

> *The event team does an initial background check via Google, and the OfS have now got what is basically a helpline for checking external speakers. You can ring them up and say "we're thinking about having this person here", and they go through a database and check to see if there's any information that might cause concern. And they let us know if there's anything we should be aware of under Prevent.*

In line with the University's policy documents, P.H confirmed that their '*general data-sharing arrangements with the police liaison officer*' enabled them to '*contact them and ask for advice and more information if we had a concern about a speaker*'. P.H admitted that the increased information exchange with external partners was '*reassur*[ing]' and '*increased the confidence of those involved in making decisions about controversial speakers*'. While '*the only events*' they could '*think of that got declined*' were '*due to health and safety reasons, and not because of the content of what they* [the external speakers] *were actually discussing*', they also disclosed that they have '*had a few around extremism-related topics that we had to put security into place and make sure that we got a balanced discussion*'. For those events, the University decided to '*get a chair to manage discussions*', instead of '*declining the event completely*'.

University H's policies remained unclear as to whether the University prohibits the expression of legal extremist views in response to Prevent. P.H clarified that in practice, Prevent has led to an increased effort to identify individuals who hold not only illegal, but also *legal* extremist expressions. At the same time, the University does not prohibit the expression of those views. Instead, they mitigate the potential risk of radicalisation by using their existing repertoire of additional conditions to actively challenge legal extremist views.

P.K explained that they look '*at each event on its own merit*', and that Universities K and L both have '*several questions the event organiser has to respond to*' as part of their '*risk assessment on any speaker they bring in*'. P.L disclosed that although both universities have their own procedures in place, they rely on the same external service company to manage their shared facilities. P.K told me that this shared service organisation requires event organisers from both universities '*to confirm that they've done some research and if there's some controversy associated with the speaker, if they had been denied access somewhere else, have received media attention, those kind of questions*'. The '*booking system automatically allows them to proceed with the booking if the answers are generally no*', but '*if anybody signals a yes, then it's paused and forwarded to our cause for concern team*'. Here, '*a colleague reviews the request, checks on open source information to see whether there's any sort of substance, if there*

are too many concerns'. If they '*agree that it's fine, it* [the system] *just reinstates the booking and carries on*'.

Those structures were not developed in response to Prevent. However, '*if there are some concerns of a Prevent-related nature, the team would then engage with the Regional Coordinator, the police and the local authorities*'. P.L added that both Universities '*have a general information sharing agreement, which is what we use for our discussions with the police*'. This agreement '*is not specifically around external speakers, but* [was] *authorised as part of our Prevent partnerships*'. P.K shared P.H's feeling that their newly established information sharing agreement '*took away any doubts*' about whether they '*can allow an event, and about appropriate mitigations*'. They explained that the external partners '*make a recommendation for the registrar of University K and the chief operations officer at L, or both, to respond to, and then the event either comes forward without mitigation or goes forward with some conditions in post, or is required not to go forward*'.

The policy documents of both Universities K and L allow for the interpretation that the Universities would possibly limit the expression of legal extremist views; in the case of University L on the ground of their legal and moral obligation to minimise the possibility of radicalisation, and in the case of University K because they consider the CTSA 2015 as a legitimate reason for limiting free speech. In practice, the participants from both universities agreed that their institutions pay increased attention to the possible risk posed by legal extremist views; however, they also emphasised that they do not seek to prohibit the expression of such views. P.K made clear that '*only because we have a heightened awareness of the risks of some* [non-violent] *views*', does not mean '*that we exclude them* [individuals who hold those views] *from debate. We don't just give them the platform to express those views, we actively challenge those views*'. University L's on-the-ground approach is similar in that they '*don't stifle debate, but we control it*' so that '*extremist speakers are more careful when they express themselves*'. Whether 'controlling' debate by introducing additional panel members that make sure that speakers do not get the opportunity to express their extremist views leads to the restriction of free speech is a different matter. For example, P.K acknowledged that '*it is possible that those speakers might not say something that is technically legal, because they are aware that they* [would] *get challenged on that*'. However, they also said that '*if they do so it's not because we don't allow them to express legal views*', but more because they '*may want to avoid any backlash they would face when their views are scrutinised by opposing panel members*'.

5.2.5. The complex nature of mitigating conditions

P.N1 admitted that for them, '*one of the biggest areas that caused concerns is around things like external speakers, and policies around inviting people onto campus, and the sort of considerations we need to go though in terms of whether it's something we need to escalate and look for advice from others* [e.g. external

partners]'. At the same time, they have not responded to their new requirements '*by creating a separate policy*'; rather, they '*have modified the policy on external speakers to integrate Prevent more appropriately, to make sure that Prevent is in there and that it's appropriate*'. Most importantly, they '*never really wanted Prevent as an additional thing*' to make sure that decisions related to Prevent are '*consider*[ed by the] *same group of sensible people who are making decisions about speakers and events*' and consequently, integrating Prevent into their existing documents '*hasn't really changed our policy*' around external speakers. At the same time, they confirmed that on the ground, '*our approach to how we research the individuals* [prospective external speakers] *has changed. Now there is more information about people easily assessible for us to do the kind of background checks that just weren't there before Prevent*'. This statement reflects the approach outlined in University N's documents, which relate that the University relies on advice from the police and from their Prevent coordinators. Interestingly, however, P.N1 noted that '*while that's beneficial in one way, it can backfire as well*', because '*we get false positives from people that are very vocal about somebody and actually, if you go into what they've talked about, there's very little in there. They have caused offence, but it isn't something that we should be concerned about in terms of Prevent*'.

P.N1 shared P.B1's observation that '*external speakers have caused us the most concern because people have got a misunderstanding of what Prevent is*'. In the case of University N, event organisers '*sometimes consider a topic a Prevent issue, but they probably got an incorrect media-driven assumption of what Prevent is, and are therefore flagging an* [unrelated] *issue up as something* [related to Prevent]'. However, when '*we look at it and start examining it as a group, we then often find that it doesn't need to be considered under Prevent*'. P.N1 assured me that they '*haven't escalated anything under Prevent*', and that they '*only had one thing that we sought some local advice on, but that was predominantly around an external speaker who we knew was very likely to cause health and safety issues, rather than Prevent issues*'. They further elaborated that the event evolved around '*the far-right activist Tommy Robinson, the former chair of the English Defence League*'. They did not primarily consider Robinson as a threat to their students in that he could radicalise them; rather, they acknowledged that '*a number of students didn't want him talking*' and that this could lead to demonstrations and conflict. Here, P.N1 noted that '*obviously we had to balance our responsibilities as an organisation that is required to promote free speech and allow debate around certain topics around health and safety risk that come with that*'. The health and safety risks were not only identified because of the views Robinson was likely to express, but also because '*the individual in question tends to bring an entourage*', which could contribute to conflicts with the students who opposed the event.

Although P.N1 had emphasised that they were primarily concerned about health and safety risks of the event, they eventually admitted that they had also reviewed it from a Prevent point of view, which led them to '*talk to the police and others about whether the event presented a*

Prevent risks, and whether some of the things that the individual talks about can be understood as incitements to violence, but also as extremist and therefore potentially drawing people into terrorism'. This is an interesting statement because it suggests that concerns under Prevent are not merely centred around assessing the risk that an individual may break the law (e.g. incite violence), but also that they may express legal extremist views. This reveals that as a result of Prevent, P.N1 placed increasing emphasis on possible restrictions on legal expression. At the same time, they were able to rely on mitigating activities to allow the event to proceed: '*we worked out what was likely to be talked about and the way in which we would then run the event*', which involved '*having a counter argument, somebody taking about the other side of what was being said*'. They made sure that the debate would be '*moderated by a chair so that you feel if somebody is straying into territory that isn't appropriate for the audience, you can stop them*'. They explained the background check involved '*looking at previous speeches*', which revealed that '*the individual is always very careful not to step into hate crime territory*' and that they were '*on that basis content that it* [the event] *didn't present a Prevent risk*'.

Although P.N1 had previously implied that they might restrict legal extremist speech under Prevent, they were now able to clarify that the University continued to allow controversial views provided that they are within the law. However, the University was unable to allow the Tommy Robinson event to proceed because '*the Police couldn't provide the appropriate personnel*'. P.N1 emphasised that '*we had to cancel it on our health and safety grounds rather than on anything Prevent related*'. This case provides an interesting example of the dual effect of mitigating actions. While most participants consider them as vital enablers for balanced debate and for upholding free speech, we see here an example where they can constitute barriers to events, especially in cases were universities or event organisers are unable to meet the imposed requirements. On the one hand, the event was not cancelled because of Prevent; on the other, its Prevent-related nature required safety measures that the University could not provide. This suggests that Prevent-related reasons and health and safety reasons converge to shape universities' decisions about events involving controversial speakers.

With this in mind, it is notable that P.N1 added that highlighting the health and safety reasons over Prevent reasons is usually less controversial, because '*if you say you cancel it under Prevent, you suddenly start to find yourself in difficult areas*'. They explained that it would be dishonest to suggest that Prevent has not made an impact on decisions around external speakers. On the one hand, '*the health and safety element would have always been there, and hate crime legislation would have still been in place*' and '*it's always likely that we would have had opposition to holding that type of event on campus*'. On the other hand, '*the Prevent element added an additional consideration*'. For example, '*if we were presented with an invite where he was going to do it virtually, it was all going to be done through Zoom, the health and safety element disappears; but we probably still would have to consider*

the event from a Prevent-related angle'. And although the University acknowledged that the speaker did not risk breaking the law, they found that given '*this person's background, and the kind of risk associated with some of the things that his organisation has done, there may be a potential for people to be drawn into terrorism as a result of hearing them'*. This suggests that Prevent has led University N to develop a heightened awareness of the potential risks posed by controversial speakers. At the same time, P.N1 still acknowledged that '*we have to balance* [the risk posed by extremist speakers] *against free speech, so we would have two different sides talking about it, and it would still have been moderated*'. In this way '*Prevent has added an element to our external speaker procedures*', in that it has placed increasing attention to mitigating approaches associated with providing a balanced debate.

In contrast, P.Q expressed the view that in practice, Prevent has had a stifling effect on free speech. In their view, '*the whole discourse around the duty, and the focus on non-violent extremism*' ultimately led to *'less appetite to invite controversial speakers in the first place*'. They also shared University A's view that the costs associated with additional security conditions may exacerbate the chilling effect on free speech as a result of Prevent. They explained that '*I am under the impression that certain events are rejected on the ground that the University cannot mitigate the security risk*', when in reality '*they shy away from hosting such events because they are worried somebody will go to the OfS and suggest that they are not meeting their responsibilities under Prevent*'. They also noted that '*some universities don't have this excuse because they have the resources to provide security around controversial events'*, while '*other universities require the event organisers to pay the costs*'. In this way, freedom of speech becomes a commodity that only institutions with significant endowments are able to afford when it comes to controversial speakers. P.Q also pointed to the difficulty of evaluating the full extent to which Prevent stifles free speech on campus: '*how are you supposed to prove that speakers did not participate in an event because they weren't invited in the first place, because people are worried* [of the consequences under Prevent]*, or because universities couldn't hold the event for safety reasons?*'. They added that '*the issue with mitigating conditions doesn't only apply to speakers, but also to those who are invited to chair events*' who may be '*replaced because the University is anxious to invite more "neutral" individuals because of their Prevent duty'*. P.Q's views confirmed my hypothesis that mitigating conditions under Prevent can function as both enablers and barriers to the free speech.

The interview with P.P also highlighted that universities' on-the-ground enactment of Prevent in the external speaker area can contribute to negative effects on free speech. While University P's policies suggest that the University has not altered their approach to external speakers in response to Prevent, P.P displayed a very different interpretation of their university's response to the duty. They explained to me that

> *last year, our Vice Chancellor invited a speaker to talk about their political life, and they have written a book which includes a whole chapter on Prevent. The speaker is really critical of Prevent and also sits in the House of Lords. So I said 'I presume that somebody had done a Prevent due diligence and a speaker approval form? And they didn't'.*

When I asked them whether they were worried that this person could potentially radicalise their students or colleagues, they explained that they were not. Rather,

> *it's about being fair. Why treat this speaker differently? They were going to talk about Prevent. And that may not mean that they were going to be extremist, but they were a critic of Prevent, so you might say, well somebody needs to check that out. What's the difference between them being critical of Prevent and an extremist Muslim preacher being critical of Prevent, you know? We can't just let somebody come on campus when we know that they share the views of extremists.*

P.P had clearly misunderstood their responsibilities under Prevent. They did not evaluate the risk that a speaker may express views that are so extremist that they may radicalise others. Rather, they felt obliged to consider individuals as controversial under Prevent, even if they did not express extremist views at all. For them, legitimate views (being critical of Prevent) can only be expressed without concern if they are not simultaneously held by individuals who may also hold less legitimate views (extremist Muslim preachers).

While it is important to acknowledge that P.P constitutes the exception among my participants, their insights also confirm P.G3's suspicion that Prevent's focus on non-violent extremism renders the duty prone to misunderstandings, and invites individuals in decision-making positions to apply a heavy handed approach to managing external speakers. The case of P.P is particularly interesting because the interview suggested a wide gap between the University's policy and their members' enactment of those policies on the ground. While University P's policy is particularly vocal that Prevent has not changed their approach to external speakers, P.P was overzealous in their effort to comply with their responsibilities under Prevent, which led them to consider legitimate views as potentially dangerous. By treating a member of the House of Lords as a potential risk under Prevent because they have expressed critical views about the duty, P.P actively engaged in the securitisation of non-criminal views.

5.3. Conclusion

My analysis of universities' approaches to managing controversial speakers has revealed different levels of audience acceptance among those charged with the implementation of Prevent. Several of my participants were particularly rejecting of the narrative that external speakers who express legal extremist views warrant increased attention as a result of Prevent. While the policy documents suggest that some universities may be willing to curtail legal speech on the grounds of Prevent, my participants revealed that in practice, they refused to limit speech that is considered legal on the ground of existing legislations. In fact, several participants did not struggle to find a way to mitigate the risk of radicalisation under Prevent while at the same time upholding free speech. They also found that this did not require them to alter significantly their existing procedures, because they already had measures in place to identify and mitigate concerns associated with controversial speakers.

At the same time, the interviews revealed that a variety of participants accepted the risk of radicalisation associated with the expression of legal extremist views. Here, the additional conditions imposed by universities played a particularly important role in balancing their legal duties. They enabled them to mitigate the risk of radicalisation by offering competing perspectives; in doing so, they were also able to ensure free speech and balanced debate. Some participants even suggested that an increased focus on mitigating conditions associated with introducing neutral chairpersons and opposing speakers to the same event enabled them to improve the rigour of their approach to upholding free speech.

Several participants further admitted that more comprehensive information exchange with, and advice from, external partners under Prevent enabled them to deal with controversial speakers more confidently than before, which further supports the idea that universities' enactment of Prevent may have enhanced the conditions for free speech and balanced debate on their campus. At the same time, other participants were acutely aware that Prevent has led to a heightened risk perception regarding legal expressions, and that this has in turn led to chilling effects on free speech. They pointed to the potentially stifling effect of mitigating actions, especially if they called for the replacement of appointed moderators, or where the additional security requirements led to costs that rendered the events unrealisable. Finally, one interviewee's on-the-ground enactment uncovered an example of a grossly misinformed approach to dealing with external speakers under Prevent. While most participants accepted that non-violent extremist expressions can pose a risk that they are supposed to mitigate (but not censor!), this case provides an example of the way in which such increased risk perception has led to the securitisation of non-criminal (and in this case not even particularly controversial) views. Nevertheless, this example constitutes the exception among my participants, who overall provided evidence that their understanding and enactment of Prevent was primarily informed

by their effort to uphold free speech. Their enactment of Prevent on the ground has not led to significant securitising mechanisms in the external speaker area.

6. MONITORING AND BLOCKING ACCESS TO EXTREMIST ONLINE MATERIAL

Chapter overview

This chapter provides an evaluation of universities' approaches to blocking, filtering, and monitoring access to extremist online material under Prevent. My analysis of the 'extent and nature of the action or behavioural change following from the speech act' (Floyd, 2016, p. 688) focuses on how the seventeen university cases have enacted Prevent in the IT area. I draw on two data sources. The first is publicly available IT policy documents, ranging from IT Acceptable Use Policies and Regulations, Information Security Policies and Monitoring and Interception Policies to Safeguarding Policies and Prevent Policies. The analysis is supported by the Prevent risk assessments and action plans made available by six universities. I reviewed the documents with view to answering the following question (subdivided into three further questions):

1. How do universities enact Prevent in their IT policies and procedures?
    a. Do universities reference Prevent in their policy documents?
    b. Do universities block access to extremist material under Prevent?
    c. Do universities monitor access to extremist material under Prevent?

The second part of the chapter relies on interview data to provide a more nuanced picture of universities' approaches to monitoring and blocking on the ground than policy documents alone can provide. Here, I explore the extent to which the information provided in the documents accurately reflect the enactment of Prevent on the ground.

The interviews were also conducted and analysed with the aim of 'locat[ing] the justification for the measures taken to address the threat (that is, the action or behavioural change)' (Floyd, 2016, p. 688). Accordingly, the third part of the chapter explores Prevent Committee members' justifications for and against blocking and monitoring access to extremist material. The chapter concludes by discussing the implications of web filtering and monitoring practices for the securitisation of education.

6.1. PREVENT ON PAPER: ACTION AND CHANGE IN POLICY DOCUMENTS

6.1.1. Do universities reference Prevent in their IT policy documents?

The review of universities' IT policies reveals that all seventeen universities explicitly refer to their legal obligations under the CTSA 2015 (for more details see Table 6.1.2). However, there are also differences in the extent to which their policies provide information about how they relate to Prevent. For example, University A sets the rule that 'users are not permitted to use university IT or network facilities… with the intention of drawing people into terrorism'. However, the policy states that this is 'contrary to the University's statutory duty under Prevent', which suggests that this rule has not been established as a consequence of the CTSA 2015, but rather the Terrorism Act 2006. While the rule refers to the criminal offence of 'drawing people into terrorism', it does not explicitly deny users access to extremist material. Moreover, this is a unique case among all English university policy documents, in that it states that a university's policy is directly *contrary* to Prevent. In contrast, University L explicitly informs users that they 'must be aware of, and fulfil their responsibilities under the Government's Prevent Strategy' and University I demands that 'all computing use must comply with the Counter-Terrorism and Security Act 2015'. Both universities make clear that the legal responsibilities under Prevent do not only apply to university governance, but also to all members of their institutions, including users of the IT facilities. In a similar vein, Universities C, D, E, F, H, J, L, N, O, P, and Q explicitly inform the users of their IT facilities that they must not access, view, create, store, transmit or cause the transmission a variety of both illegal and legal online material that features or glorifies terrorist and extremist ideologies (see Table 6.1.2).

6.1.2. Do universities block access to extremist material under Prevent?

The analysis of universities' IT policies reveals various different information about universities' approaches to blocking extremist material under Prevent, which are outlined in Table 6.1.2 (see Appendix B). The majority of IT policies, namely those provided by Universities A, D, E, G. I, L, M, N, P and O, do not provide sufficient information about their blocking mechanisms.

In contrast, University B provides an overview of different categories that are subject to their filtering system, which include the website categories of 'adult explicit (including child pornography)', 'hacking, phishing and fraud' and 'spam URLs'. Those categories are marked as 'blocked access' and when users attempt to visit those sites 'a message will be displayed informing the user that the website has been blocked and giving them the option to return to the previous page they were viewing'. In contrast, websites displaying 'criminal activity', 'intolerance and hate', 'violence' and 'weapons' and 'tasteless and offensive' content are categorised as 'send warning but allow access', which means that 'a message will be displayed informing the user that the websites contains questionable content'. This approach shows that the University does not block access to extremist material under Prevent.

Universities H and K's policies reveal identical phrasings which declare that they 'reserve the right to block' access to 'unlawful material or material that is indecent, offensive, threatening, discriminatory or extremist, or which may cause others to be drawn into terrorism'. This statement makes clear that the universities block material that falls under the Prevent category. However, it does not disclose which of the categories are blocked in direct response to Prevent: it may be the case that the Universities reserved the right to block all of the categories prior to the enactment of the duty, for example in response to the Terrorism Act 2006 or the Equality Act 2010.

There are two types of extremist material: illegal and legal content. While the blocking of clearly illegal material may be a relatively straightforward activity, it is much less clear how universities decide which extremist yet *legal* material should be blocked. While University H does not address the decision-making process relating to the blocking of legal material, University K notes that 'the interpretation will normally be responsibility of the Registrar and Secretary'. In any case, these universities' policies merely state that the universities reserve the right to block access to extremist material, without revealing if they actually do so.

None of the publicly available IT policy documents explicitly declare that the universities block extremist websites as a direct reaction to the Prevent duty. However, the Prevent action plans of two universities reveal that they have blocking mechanisms in place. University J's policies merely state that 'the campus firewall provides protection to devices and services at the University from certain forms of attack from the outside world, by blocking or restricting access to them'. This does not reveal any mechanisms that explicitly restrict access to extremist material under Prevent. However, the University's action plan declares that 'details of illegal terrorist and extremist websites will be provided to IT Services by the Further and Higher Education Prevent Officer' and that 'access to these sites will be blocked using the University's filtering software'.

University O's document display a similar gap between the publicly available IT policies and the restricted action plan. The policy document states that 'the University reserves the right to implement filtering to block access to unlawful material', unless access is granted as part of a legitimate research project. It does not reveal whether this right to block unlawful material was developed in response to their Prevent duty. Moreover, the policy does not suggest that the University reserves the right to block any lawful, extremist material at all. In contrast, University O's action plan reveals that the University does not merely 'reserve the right' to block illegal material, but that it explicitly blocks a variety of extremist sites using web-filtering software provided by Palo Alto Networks. The IT policy refers to 'unlawful' material or statements 'which encourage or glorify terrorism', 'terrorist publications' and 'information likely to be useful in the

commission or preparation of terrorism', as well as 'indecent images of children'. The action plan, however, relies on an 'extremism' category which additionally includes 'websites promoting terrorism, racism, fascism or other extremist views discriminating people or groups of different ethnic backgrounds, religions or other beliefs'. There is thus an incongruency between the University's IT policy, which reserves the right to block unlawful material, and the Prevent action plan, which reveals that the University blocks material that is categorised as 'extremist' but not explicitly as 'unlawful'.

The a sharp contrast between Universities J and O's policy documents and their on-the-ground approach points to the possibility that other universities may equally assume a different approach to blocking extremist material from that indicated in their policy documents. How universities actually position themselves with regard to the possibility of blocking websites under Prevent will be explore as part of the analysis of interviews with Prevent Committee members (see §6.2.1).

6.1.3. Do universities monitor access to extremist material under Prevent?

The document review reveals very little about universities' approaches to monitoring access to extremist material under Prevent. Table 6.1.3 (Appendix B) provides a comparative overview of universities' policy approaches to monitoring their IT facilities. The documents show that several universities reserve the right to monitor (Universities A, B, C, O, K). Others maintain that they either have 'the right to monitor' (University N) or that they 'monitor' the use of their IT facilities (Universities D, G, J, J, L, M, P, Q). In addition, some university policies provide insight into the nature of potential monitoring activities, which entail the monitoring of emails and internet usage. This reveals that universities have the technological capacity to carry out a variety of different forms of monitoring, which includes accessing private information about individuals' IT usage. However, these information alone provide little insight into universities' monitoring approaches under Prevent.

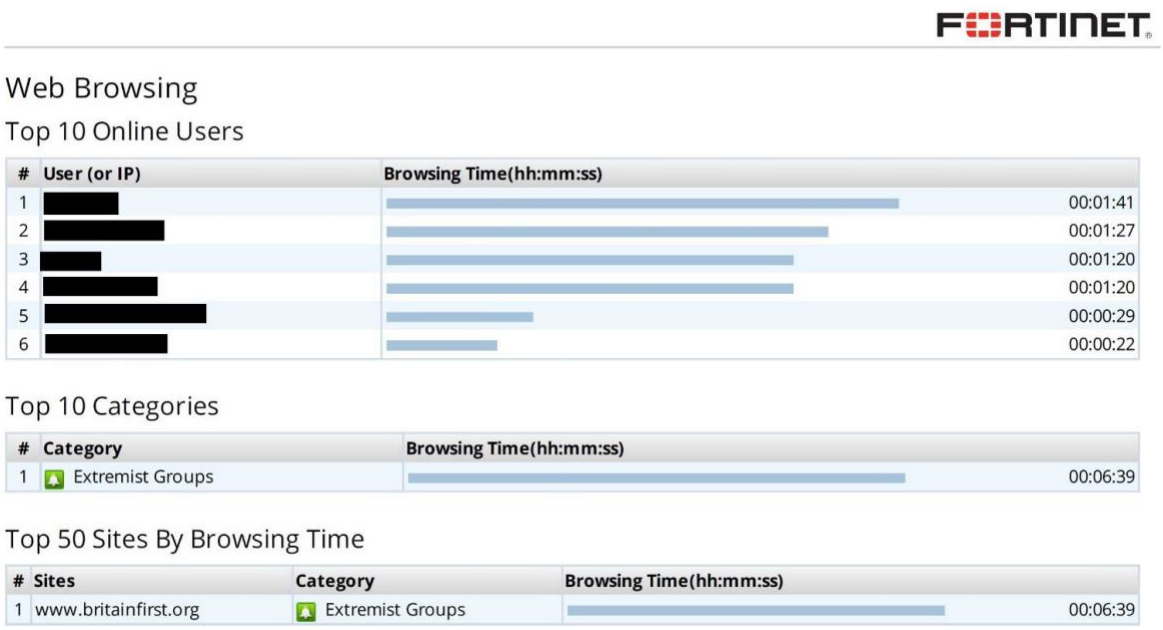
Some universities acknowledge the difference between 'targeted monitoring' of individual users' online activities and 'operational monitoring' required to 'maintain the normal operation of the University IT Facilities' (see Universities A and B). In turn, one group of universities declare that they do not routinely engage in 'targeted monitoring'. For University A, 'routinely capturing all traffic in detail would constitute a gross invasion in privacy' and University C explicitly declares that 'monitoring and logging is carried out with regard to the privacy of users'. Universities B, D, E, F, G and M also maintain that they are not actively or routinely monitoring individual users' online activities. In contrast, other universities are less clear about their approach to monitoring. They declare that they 'reserve the right' (University

J), may 'from time to time' (University N), and 'randomly' (University O) monitor individuals' IT usage. In stark contrast to Universities A and B, University N states that 'users should have no expectation of privacy when using the University's IT facilities'. Moreover, the policies of Universities H, I, K, P, and Q do not reveal whether their approach to monitoring is one of routinely examining individual users' IT activity or not.

6.1.3.1. *Monitoring under Prevent*

Although all seventeen universities have the technological capability to monitor individuals' online activity, they also suggest that they do so for different reasons. Universities which do not routinely rely on targeted monitoring may do so under what University B calls 'exceptional circumstances'. My document analysis revealed that only a few universities link their monitoring approach to the Prevent duty. University H merely states that it reserves the right to monitor access to extremist material, without declaring whether it monitors individuals under Prevent. University B includes the CTSA 2015 in their list of 'laws and regulations affecting monitoring and logging', but neither explicitly reserves the right to monitor access to extremist material, nor provides any further information about how and whether information is gathered and disclosed as a result of the Prevent Duty.

University L constitutes an exceptional case of monitoring under Prevent. Their policy documents explain that they developed a 'Prevent Monitoring Process' in direct response to their legal obligations under the CTSA. The document reveals that access to extremist material is monitored in real time, resulting in a monitoring report produced by the FortiGuard Firewall. Staff members in IT services manually anonymise the information provided in this report and share the document with the Director of Student Services, who is 'advised as appropriate by [Prevent] statutory agencies/partners', and is in charge of determining whether any further action is warranted. If deemed necessary, IT Services can disclose a 'Specific Activity Report' with 'more detailed, specific and un-anonymised information', which helps the Director of Student Services to decide whether the individual in question shall be referred to the anti-radicalisation Channel programme. The document adds that the 'Specific Activity Report' is also 'made available on request to external agencies, including the Police and Security Services'. Additionally, University L's documents provide an example of the Firewall report:



Web Browsing

Top 10 Online Users

#	User (or IP)	Browsing Time(hh:mm:ss)
1	[redacted]	00:01:41
2	[redacted]	00:01:27
3	[redacted]	00:01:20
4	[redacted]	00:01:20
5	[redacted]	00:00:29
6	[redacted]	00:00:22

Top 10 Categories

#	Category	Browsing Time(hh:mm:ss)
1	Extremist Groups	00:06:39

Top 50 Sites By Browsing Time

#	Sites	Category	Browsing Time(hh:mm:ss)
1	www.britainfirst.org	Extremist Groups	00:06:39

This example is particularly interesting for two reasons. First, it shows that monitoring under Prevent can encompass detailed and real-time monitoring of individual users' online activity. Second, it provides information about the nature of the websites that fall under the 'extremist' category. Britain First is an extreme far right political organisation, but it is not considered a proscribed terrorist group or organisation. Under Prevent, universities are not legally obliged – but are encouraged – to monitor access to legal extremist websites. University L seeks compliance with Prevent by employing this optional mechanism in order to identify individuals at risk of radicalisation. Although the University's policy documents are exceptionally detailed, it remains unclear how the University decides which websites they flag as extremist, and there is also no indication about the threshold for intervention. For example, the documents do not explain whether the de-anonymisation of individuals occurs after a single access attempt, or in response to a specific pattern. Moreover, it remains unclear under which circumstances un-anonymised information is shared externally. Despite these ambiguities, University L's documents provide nuanced insights into the possible scope for online surveillance under Prevent.

6.1.3.2. *Exceptional monitoring as required by law*

None of the other universities explicitly link their monitoring activities to the Prevent duty. However, this does not necessarily mean that they do not monitor access to extremist material so as to comply with Prevent. Several universities' policies maintain that their universities may monitor individuals' online activities in compliance with their legal obligations (see Universities

E, F, H, G and M). However, the CTSA 2015 does not legally require universities to monitor individuals' online activity, and thus it seems unlikely that such policy formulations suffice to accommodate newly established monitoring solutions under Prevent. At the same time, it may be possible that universities already reserved the right to implement monitoring mechanisms to trace access to extremist material under the Regulation of Investigatory Powers Act (RIPA 2000). The Act entitles law enforcement agencies to issue a warrant to universities requiring them to intercept communications without consent. More specifically, universities can be compelled to carry out 'direct surveillance' for a variety of reasons, including if necessary 'in the interest of national security' and 'for the purpose of preventing or detecting crime or of preventing disorder' (Paragraph 28, 3 (a)). Universities B, C, E, F, and O explicitly refer to the RIPA in their IT policies. Universities B, C, I and O state that they are permitted to monitor in order to prevent and detect breaches of law, and in the case of University C also 'in the interest of national security'. However, the RIPA merely entitles universities to carry out monitoring as part of a formal request from law enforcement agencies, which means that it is unlikely that newly introduced approaches to monitoring extremist material are covered by the Act. For example, Universities C, H, J N, Q and L inform that they will monitor in compliance and cooperation with lawful requests from law enforcement agencies.

Their policy documents suggest that universities are carrying out exceptional monitoring in compliance with the RIPA, rather than in response to Prevent. Depending on one's interpretation of Prevent, its goals may overlap with those of the RIPA, which serves the purpose of monitoring online activity to detect and prevent crime. The purpose of Prevent is not to detect crime, but to 'stop people from becoming terrorists or supporting terrorism', by hindering people 'moving from extremist (albeit legal) groups into terrorist-related activity' (HM Government, 2015). In this way, one could argue that Prevent equally serves the purpose of crime prevention. This means that theoretically, universities' compliance with Prevent is at least partially satisfied by carrying out monitoring for the purpose of preventing crime in compliance with the RIPA. An investigation of whether the two regulations overlap in practice will form part of the interview analysis in §6.2.3.

6.1.3.3. *Monitoring on the grounds of suspected breaches of university regulations*

In addition to acknowledging legislations that require them to monitor, Universities B, E, I, G, H, K, N and Q's policies justify exceptional monitoring to ensure compliance with their institutional rules and regulations. None of these universities explicitly declare that this monitoring directly relates to the Prevent duty. However, as noted earlier, all universities explicitly refer to Prevent in their IT policies. Monitoring in order to ensure compliance with

university regulation therefore technically covers monitoring to comply with Prevent. For example, where there are 'reasonable grounds to suspect an instance of unacceptable use of any University IT facilities', University D grants certain IT staff members permission 'for the monitoring or investigation of an individual's use of IT facilities', which encompasses 'the monitoring of email and use of the internet', including the 'use of social media websites'. In addition, the policy unambiguously declares that the University has an 'explicit duty under s26(1) of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism' and that this 'may require the University to monitor and report'. In this way, University D reserves the right to monitor access to extremist material under Prevent, although their policies do not provide any clarity about the circumstances in which they may choose to exercise this right in practice. The same applies in the cases of Universities G, H, N, O, P, and Q, whose policies set out rules for the use of IT facilities under Prevent, and who also declare that ensuring compliance with university regulations constitutes a legitimate reason for monitoring. In this way, it is possible that monitoring access to extremist material is integrated into or covered by policies that declare that universities may monitor so to identify breaches of university regulations.

The action plans of Universities O and H confirm this reading. University O's action plan draws a more detailed picture of the monitoring possibilities of a university whose policies merely reserve the right to monitor individual users' activity in order to ensure compliance with its regulations. The University's policy documents reveal that monitoring may encompass the collection of detailed information about the web activities of individuals, including emails sent and received, websites visited, and time spent on the internet. Reasons for carrying out such monitoring activities incorporate no reference to extremist material, nor to their duty to safeguard vulnerable adults. In contrast, the action plan refers to University O's acceptable use policy, which prohibits users from accessing 'material promoting extremist ideologies which place individuals at risk of being drawn into terrorism'. It further reveals that the university monitors access attempts and relies on the 'web filtering software provided by Palo Alto Networks'. Here, 'four categories are logged and reviewed for web access that may be of potential concern relating to Prevent'. Similar to the approach outlined in the policies of University L, 'attempted access to the "extremism" category are reported to the University Secretary'. The action plan goes on to declare that 'repeated access attempts will be considered under the Safeguarding policy'.

The case of University O is particularly interesting because the policy documents do not indicate any of the monitoring practices outlined in the action plan. Furthermore, none of the reasons for monitoring imply that the University relies on real-time monitoring of users' access to websites, nor does the policy document reveal that access to extremist material is monitored

by the University. However, this gap between the policy documents and the action plan does not necessarily constitute an incoherence, because universities whose policies a) prohibit access to Prevent-related material, and b) declare that they monitor compliance with their policies retain the possibility to monitor under Prevent.

The case of University H offers further confirmation of such an interpretation. The policy documents prohibit engagement with Prevent-related material and declare that the University 'monitors and records', not specifically in order to investigate Prevent concerns, but to detect and prevent misconduct and infringements of its university regulations. In turn, the action plan again renders more visible the implicit relationship between the Prevent duty, acceptable use policies, and monitoring practices, asserting that 'mitigating activities to manage the risk of people accessing extremist and radical material' include 'utilizing monitoring of activity where there is a clear case to do so in accordance with the University's policies'. Seemingly non-Prevent-related policy formulations that refer to the University's right to monitor IT usage for the purpose of ensuring compliance with university regulations thus already cover Prevent-related reasons for monitoring.

6.1.3.4. *Conclusion: monitoring under Prevent*

The policy declarations related to monitoring practices are vague, and in most cases it is impossible to make any substantive claims about whether universities monitor IT usage under Prevent on the basis of their policy documents. Some universities merely reserve the right to monitor IT usage without providing information about their on-the-ground approach. And while a few universities distinguish between active monitoring of individuals' activity and passive monitoring, others do not provide insight into the scope of their monitoring practices at all. Finally, only University L's policy documents establish direct links between their monitoring possibilities and their Prevent duty. University K's vague statement that it 'reserves the right' to monitor 'access to extremist material' constitutes the second most transparent policy statement in this regard. None of the other universities refer to extremist or Prevent-related material as a reason to monitor. In contrast, the action plans reveal that universities may monitor IT usage under Prevent, without explicitly declaring this in their policy documents. The document analysis confirmed my hypothesis that some of the circumstances that constitute legitimate reasons for monitoring already cover the possibility of monitoring under Prevent. In particular, the policy documents that justify monitoring on the grounds of ensuring compliance with university regulations already seem to cover newly established structures in response to Prevent.

6.2. PREVENT IN PRACTICE: ACTION AND CHANGE ON THE GROUND

6.2.1. Do universities block access to extremist material under Prevent?

The document analysis revealed that Universities J and O employ blocking mechanisms in order to prevent people from accessing extremist websites under Prevent. Interviews with Prevent committee members of both universities confirmed this finding. P.J told me that '*we can block access to online material. So I would imagine by now any extremist material is blocked, and definitely any member of staff who has a concern about these websites being accessed can report it, and IT will block it*'. P.O confirmed that in response to Prevent, they '*have implemented filtering measures in order to prevent students from accessing potentially radicalising material*'. Like University J, U.O already had blocking mechanisms in place for other categories that they '*consider problematic*'. Here, P.O elaborated that '*even before Prevent, we blocked access to things like beheading videos. We block violent illegal content, and that includes extremist material*'. Although this approach to blocking is integrated into existing blocking mechanisms, those structures were further altered to include the '*extremism*' category, which now includes '*websites that are not necessarily illegal or violent*' but also those that '*promote extremist views*'.

The policy documents of Universities H and K merely state that they reserve the right to block extremist material. The interviews reveal that the universities have assumed contrasting approaches to blocking online material on the ground – despite their similar policy formulations. Neither university implemented specific blocking mechanisms as a direct consequence of the Prevent duty. But while University H '*does not block any material at all*', University K has '*a complete block on some sites that are clearly illegal terrorist websites*'. In this way, P.K felt that their institution '*could show the OfS that we are compliant with Prevent in the IT area*' without actually changing their approach on the ground.

None of the other universities' policies suggest that they block extremist material relevant to Prevent. However, the interviews revealed that in practice, Universities L, P, and M developed blocking mechanisms in response to Prevent. P.L told me that '*if you are attempting to access material which is illegal, for example child pornography and websites of proscribed terrorist organisations, our mechanisms block you from accessing these*'. This blocking mechanism was not developed in response to Prevent '*but it serves the same purpose, that is to prevent people from accessing radicalising material*'. For P.L, blocking access to clearly illegal material satisfies their requirements imposed on the University under Prevent.

When I asked P.P '*What changed at* [your] *university because of Prevent?*' they told me that '*IT was one area which we got around eventually*'. P.P acknowledged that blocking access to extremist material is not a legal requirement, but rather that '*HEFCE's message was that we are autonomous, and we have to make a decision on how we want to respond to the risk level at our university. We had*

filtering systems in place for general security, and particularly around pornography'. However, as a result of Prevent, they '*decided to be more wary about certain issues, so we now have all sorts of political filtering*'. When I asked them what they meant by '*political filtering*' they clarified that '*our filtering package now covers jihadist websites too, rather than only pornography*'. P.P added that they '*don't make that decision* [about] *what is blocked, that's all decided by the package we bought. We are not in control of that*'.

P.P's insights further confirmed my finding that an analysis of policy documents does not fully capture how universities deliver the Prevent duty in reality. In the case of University P, none of the policy documents indicated any filtering mechanisms under Prevent. In contrast, the interview revealed a behavioural change in response to the duty, manifested in the implementation of filtering mechanisms that block access to the newly established 'political' category. P.M revealed a similar incongruency between policy and practice. Although University M's policies do not reveal any blocking mechanisms under Prevent, the interviewee admitted that '*if any websites related to extremism or terrorism are illegal, then they're automatically blocked, unless the person who wants to access them has gone through an ethics committee as part of a research project*'. As opposed to University L, which blocked illegal material prior to Prevent, University M decided to block such websites as a direct reaction to Prevent. And in contrast to University P, which blocks a vaguely defined category of 'political' content, University M decided to achieve compliance with Prevent by merely blocking '*websites related to extremism or terrorism if they are illegal*'.

The participants of the remaining ten universities declared that they decided against blocking access to extremist material. Reasons for and against the decision to employ blocking mechanisms are further outlined §6.3 below.

6.2.2. Do universities monitor access to extremist material under Prevent?

The document review showed that aside from Universities L and O, none of the universities indicated that they monitored individuals in order to identify access to extremist material. Most universities did not disclose sufficient information in their documentation to make any substantive claims about universities' on-the-ground-approach to monitoring IT usage under Prevent.

The gap between policy and practice became particularly clear when I asked P.N2 about the policy statement that the University 'has the right to monitor all usage of the IT communications and computer systems at any time and without notice'. Even though they had authored the policy, they told me that '*it's quite interesting actually, because it's a legally dubious statement. Now, we did consult with our solicitors, and we decided to put it in there. But actually, under the Human Rights Act and under certain case law, we don't have a blanket right to*'. When I went on to

ask them about the scope and purpose of the policy's statement that 'students should have no expectation of privacy', they responded somewhat evasively: '*I mean, I think for one thing, we can put anything in a policy and call it a policy. But if it contravenes human rights, and if it contravenes case law, then it's effectively meaningless. I mean, to be honest, policies are meaningless to a certain extent without enforcement*'. They considered the phrasing 'having' or 'reserving the right to' monitoring merely as policy statements, while emphasising that the policy enactment relies more on '*what tools we use, who has responsibility, and who would then notify the right people*'.

A very similar dialogue occurred in the interview with P.J, whose policy states that the University reserves the right to undertake covert monitoring without prior notification. When I asked them whether this is in any way related to monitoring under Prevent they told me: '*I'm not sure. It feels like the kind of clause that's in there just in case we ever need it, rather than being a practical thing that we actually do*'. P.N2 and P.J's statements support the premise that evaluations of any securitising element in the higher education sector cannot rely merely on evidence deriving from policy documents. Interviews with those individuals who enact upon Prevent 'on the ground' are essential to provide more clarity. Table 6.2 (Appendix B) provides a comparative overview of universities policy responses and their on-the-ground approach to monitoring individuals' online activities under Prevent.

6.2.3. The different faces of monitoring

In the case of University L, the interviewee confirmed that their policy documents accurately reflect their approach in practice:

> *Not everything is monitored, but if people attempt to access certain sites defined by an external software supplier – we use FortiGate Technology and they maintain a list of what's lawful or unlawful – so if people attempt to access what FortiGate thinks of as a dangerous site, they receive a warning that anything that goes through this gateway will be monitored. And there's a process which ends with me receiving reports where those warnings are triggered and monitoring is undertaken…* [in such cases] *the system sends me an automated trigger email, summarising the content, or the web domains, the accessed date, time, and a lot of technical information, as well as a user ID which relates to an individual student's IT account.*

Consequently, P.L is '*able to look up the name and contact information of the student in question*' and to '*identify an individual through that kind of cross tabulation*'. They '*record that in a spreadsheet, which is secured to three senior members of staff in student services*'. P.L then looks at '*the nature of the activity and the frequency*', and although

the report is not clever enough to tell you the content, it does tell you about the amount of data sent and received, and we've got estimates for what it looks like to watch a video, to click on images, to read text pages and so on. So based on the amount of activity, the nature of the website and the frequency of access attempts, I make a judgement-based decision around whether we need to reach out to the individual.

Interestingly this judgement does not only rely on the data provided in the monitoring report: '*The spreadsheet is set up to highlight people doing multiple occurrences and to highlight people in known groups, so people on the same programme of study, clusters of people that study together*'. In addition, P.L sometimes takes '*other information that I am aware of into account. For example, in relation to that student's support requirements, or activities that we are alerted to because my department is also responsible for student discipline*'. This means that P.L has access to information about '*mental health worries and anxieties, student discipline, complaints, grievances of individuals in the student community and all kinds of general welfare*', and thus has '*has good visibility of what's going on in the student population*'.

P.L further explained how the University complements data retrieved from the monitoring process with information from the welfare services:

We had examples of individuals about whom we've had reports from other students who were worried about stuff they're talking about. And we log that information. People whose behaviour has changed, people who are reported to make comments that others feel to be offensive, racist, discriminatory against religious minorities, and so on. And so I'm able to look at those records when I look up a student who got flagged by our online monitoring. And out of that, a decision is made as to whether or not to trigger an intervention.

In case they decide to intervene, University L has '*a process to review, and, in a number of cases, to reach out to individuals who have triggered those warnings, to discuss with them the nature of the content that they're accessing*'. In some cases,

it will be appropriate to discuss the case either anonymously with the DfE regional Prevent coordinator, or with the local police or special branch. On a number of occasions, we had a conversation with a student and a member of the police service in attendance as well, to impress on them the importance of the points we wanted to make.

When I asked: '*What has to happen for you to bring the police in?*' P.L responded that '*it depends on a number of variables*'. The participant opened the file that included the actual list of individuals

under investigation at University L and explained '*a first infraction, if you like, would receive probably no further action response*'. However,

> *there is a small number of cases where we have taken steps. One student made an access attempt in October last year, and then another in November. On the first attempt no further action was taken, on the second attempt the amount of data suggested they'd watched a video. I requested some additional data from the IT department and they got more information about the browsing activity five minutes before and after the incident trigger. When that individual had another access attempt in February we decided to engage with that student.*

The student in question had accessed the extreme right-wing websites Britain First and the Daily Stormer. When I asked if the interviewee could tell me more about the nature of the material subject to monitoring under Prevent, they told me that in the case of Britain First '*it's not an illegal activity, it's an extremist activity, which is subject to monitoring. I think it's legitimately categorised as an extreme right-wing organisation, and as a consequence subject to filtering*'. They added that '*the Daily Stormer is very common for people to stumble into. I have reviewed it and it publishes pretty unpalatable material and a lot of it I would probably say is not illegal, but in my view pretty potent material. So we decided to engage with that student*'. P.L did not involve the police in this particular situation, but in other cases, particularly where '*a student expressed hateful views against others*', '*getting the police on board*' is considered an effective way '*to alert students to the consequences of potential future behaviour*'.

None of the other universities' policies suggest similar surveillance mechanisms. The policies of Universities A, B, C, D, E, F, G and M in particular declare that they do not use any 'active' or 'routine' monitoring practices like those employed by University L. However, the document analysis revealed cases in which universities monitored online activities in compliance with Prevent without explicitly declaring this in their documents. Several interviewees confirmed that universities can change their behaviour on the ground without having to document this in detail on a policy level. In fact, the gap between policy and practice became particularly evident in the case of University K. Because the University has shared campus facilities with those of University L, those facilities are subject to University L's monitoring regulations:

> *The response to the Prevent duty, it was very quickly recognised, needs to be delivered on a partnership basis. What one university does affects the other. This means that on the whole, the universities have generally tended to interpret most of the statutory duty requirements in a fairly similar way.*

However, P.K also found that '*there are some important ways that* [we] *aren't aligned*'. Most importantly, University L decided to monitor access to extremist material, and University K decided against it. This led to a situation where '*you've got two student communities sharing one internet infrastructure. In the residential network, the person next to you from the other uni is doing stuff and their policy is different*'. Despite the differences on the policy level, in practice University K and L's

> *technology didn't permit us to distinguish between the two. So effectively we had to give… preference of the university who wanted to monitor, which meant putting it on everybody, although for half of that population, their institution's policy was that it shouldn't happen or that it wasn't happening.*

P.K further told me that '*now we have the technology to differentiate, but we don't differentiate yet; there is a continuation of the current status*'. Although University K is '*aware of this as a potential issue*', they '*tolerate the difference, if you like the inconsistency of the approach*', and eventually they '*don't balk at taking steps where they're provided with information that a suggested student might be at risk*'.

University O's action plan already shed light on to the discrepancy between IT policies and on-the-ground practices: the policy documents state that the University merely reserves the right to monitor, and while routine monitoring practices may only occur randomly from time to time to ensure compliance with university policies and under existing legislation, the document does not suggest that it may occur under Prevent. In contrast, the action plan reveals that the university monitors access to websites that form part of the 'extremism' category (see further §6.1.3.4.2 above). When I pointed this out to P.O, they told me that '*access to illegal extremist material is already prohibited under the Terrorism Act, but we have updated our acceptable use policy, we now explicitly prohibit accessing, downloading and distributing material that promotes extremist ideologies*'. Such material '*is not necessarily illegal, but we still prohibit access if it places individuals at risk of being drawn into terrorism*'. When I asked them why their IT policies do not explicitly state that access attempts to such material are now monitored by the University, they told me that '*our policies inform users that we can access personal information to ensure compliance with our regulations. We don't actively monitor everything that everybody does online*'.

In the view of P.O, the formulations in their IT documents sufficed to inform users about the process that they newly established in response to Prevent. On this score, they informed me that existing structures were used to accommodate the duty: *'To ensure user compliance with the Terrorism Act, we don't allow access to illegal material, to websites that glorify terrorism and violence. So we already had a filtering software in place to identify and block those sites*'. Today, in response to the Prevent duty, this software '*determines what belongs to the extremism category*' and that '*access attempts*

to all websites in this category are monitored regardless whether they are blocked or not'. Similar to the process outlined by P.L, '*repeated access attempts are reported and reviewed for further action*'. Although University O introduced novel monitoring mechanisms in order to identify students at risk of radicalisation in direct response to Prevent, the change has been perceived as negligible on the ground: '*In my time, we haven't had repeated incidents of students trying to access highlighted content*'.

All of the remaining universities firmly decided against the active monitoring approach adopted by Universities L, K, and O. While the interviewees confirmed that their institutions have the technological means to record users' online activity and to access the search history of individuals, they had different views about the circumstances that might justify such measures.

For example, University L's method differs strongly from that taken by University B: P.B3 told me that '*although there is an inevitable level of passive monitoring*' where '*anything that passes through our firewalls, when we've got the IP address, can be tied back to a device, it's not that anyone is going out there tying all of this together*'. University B does not receive a notification if a student accesses a webpage deemed controversial or illegal: '*it records, but there isn't a notification. I don't get an email saying: this is what happened*'. In accordance with University B's policy declaration that they do not employ routine monitoring, University B does not rely on the same active monitoring practices evident in the cases of the Universities L and K. However, when I asked P.B3 whether they would consult the information they passively collected in a case that was relevant to Prevent, they told me '*yes, absolutely. We've got 90 days of firewall logs. We would identify the devices and the user, and then we would take all of the logs form that user and those devices, and we'd see what they've been looking at*'.

Moreover, the interview with P.B3 was particularly useful for shedding light into the grey area of information sharing with the police under Prevent. The University's policy states that it complies with lawful requests for information from law enforcement agencies. When I asked P.B3 whether Prevent constitutes a legitimate reason for them to formally request the University to monitor their students they told me '*possibly, you know, they could say that under the auspices of Prevent, they are worried about a particular person and ask us to help*'. P.B3 added '*it's an interesting grey area, because I don't know what would happen if the Prevent board denied cooperation. We'd probably get in trouble*'. On this score, their insights also revealed more about the way in which Prevent overlaps with existing legislation:

> *We have data on everyone, that was also the case before Prevent. Nothing has changed here. Would we be able to share it upon request from the police? Yes, that was also the case before Prevent. But*

would we share information with the police under Prevent? That would be up to the Prevent board. It's a difficult decision, because Prevent concerns are not about criminal activities.

University M's policies declare that although they monitor internet usage, they refrain from routine monitoring mechanisms. While individuals' online activities may be monitored in compliance with ongoing investigations, the policy does not suggest that Prevent constitutes a justifiable reason. Consequently, P.M emphasised that although '*we have the capacity, the ability, to monitor IT and access, we're not using it, not on an active basis*'. However, similar to P.B they declared that '*if as a result that something's brought to our attention, we may well do monitoring as part of an investigation*'. While not explicitly declared in the University's policy documents, University M looks at search histories if university members express Prevent-related concerns:

> *We've done that in the past where concerns have been raised. So we have the ability to look at the history and profile, and depending on the outcome of both the investigation and the nature of the allegation or concern, we will decide on a case-by-case basis how we conduct further investigations. And if we are doing that, we are likely to involve the Regional Coordinators and Police liaison officers.*

When I asked P.M to tell me more about the cases in which they have consulted students' online activity records because of a Prevent concern, they told me '*we had an issue, a particular concern raised by an academic. And we were able to go back over a period of time and look at the individual's history*'. P.M was '*able to determine very quickly that this wasn't a Prevent related issue: the student failed to log out of a university machine and one of their classmates played a trick on them and logged on to something inappropriate*'. However, they '*also interviewed the particular individual* [who did not log out of the university machine] *so that they understood what they'd done and how that might be perceived*' to safely '*determine that it wasn't a malicious act and it wasn't done with intent*'. This practice was justified on the grounds of existing policy formulations which grant the University the right to monitor to ensure compliance with university regulations and JISC user requirements: '*they breached their user agreement by not logging out of their computer when they left the work station*'. However, the interview also made clear that the choice to access the student's search history was not made with the intent to investigate breaches of user agreements, but in order to establish whether the student was '*involved in a Prevent incident*'. P.M's comments thus provide evidence for a case where a university has changed their on-the-ground behaviour in direct response to Prevent without reflecting this in their policy documents.

Like Universities B and M, University D's policy documents state that the University refrains from routine monitoring practices. University D merely reserves the right to monitor material that is extremist under the CTSA 2015. The interview with P.D confirmed that the university's policies reflect their on-the-ground approach. Just like University B, they do not employ monitoring mechanisms that notify them whether individuals have accessed extremist material. However, P.D admitted that '*I won't say we don't monitor that at all. We can access records of what people have been looking at. But we don't do it actively. So we don't look, but it's there if we had to*'. P.D also confirmed that they would access this data in direct response to their Prevent duty '*if we consider making a Channel referral or even on a more serious note, if we are worried that a student might be planning to get involved in a terrorist activity, we could then see whether a student had looked at specific things online*'. This statement suggests that University D treats concerns related to non-criminal behaviour in a similar way as concerns related to criminal activities. Under Prevent, universities are obliged to identify signs of radicalisation. Conversely, intervening in planned terrorist plots forms part of the 'Pursue' strand of the CONTEST strategy. Pursue explicitly deals with criminal activities and is the responsibility of MI5 and the Counter-Terrorism Police. However, P.D's statement reveals a certain conceptual conflation between Prevent and Pursue, which seems to stem from their awareness that '*the Terrorism Act 2000 obliges everyone to report information to the police that assist them in preventing terrorism*'. At the same time, the Act does not suggest that institutions other than law enforcement and intelligence agencies are obliged to consider online surveillance in order to prevent terrorist attacks. Under the RIPA, universities may assist those agencies in the prevention of crime by providing information about online activities; however, this is only relevant in response to an official request. For P.B, Prevent justifies accessing students' search histories in the absence of external requests in order to investigate potential involvement in terrorist activities.

In contrast, other participants emphasised that such monitoring practices should only occur outside of the realm of Prevent, because the duty to identify cases of non-criminal vulnerability to radicalisation does not constitute a sufficient threshold for such investigations. A comparison of the different universities uncovers varying thresholds for accessing users' search history. Universities B and D would only rely on this monitoring practice in situations they considered particularly severe, while P.M decided to review the search history of a student whose friend had logged into a website that '*wasn't a Prevent related, ideological website or anything like that*'.

As opposed to Universities B, D, and M, University H's policies state that the University monitors and records IT usage without specifying whether this involves routine monitoring mechanisms. The document does declare that the University reserves the right to monitor access to extremist material, and that individuals' activity might be monitored in order to investigate

breaches of university regulations. On the other hand, the action plan discloses that the University relies on monitoring in order to manage the risk of people accessing extremist and radical material. However, the monitoring approach assumed by University H does not resemble the proactive monitoring practice carried out by the Universities L, K, and O, but rather the reactive approaches adapted by the Universities B, D, and M. Although the university does not rely on routine monitoring – '*we don't do any kind of monitoring or real time surveillance of web activity*'– P.H admitted that '*in the couple of referrals to the police for investigation, and one quite recently has gone through Channel, we did get IT to pull off the records that we had*'. Although the policy declaration of University H differs from those of Universities B, D, and M, they all rely on the same retrospective monitoring mechanisms under Prevent, albeit with different thresholds.

The case of University J resembles that of University H. While the University reserves the right to monitor IT usage routinely, the policies do not provide any information about the circumstances that justify monitoring. At the same time, the action plan states that the University 'continues to monitor with Bright Cloud Intelligence', which suggests that it employs monitoring mechanisms under Prevent. In practice, P.J revealed that University J does not receive notifications if users try to access extremist material and that '*we obviously don't monitor every student*'. When I asked P.J to tell me more about how they used Bright Cloud Intelligence under Prevent, they added that the monitoring software is predominantly used to identify malware and to block access to extremist material, but not to carry out monitoring of individual users. However, '*if there is a concern, we can really, really dig into it*'. P.J also explained that they would do this in response to Prevent-related concerns. When I asked them why their policy documents do not name Prevent as reason that justifies monitoring, they explained: '*We can monitor infringements of university regulations. That's written in the policy. So in terms of Prevent, if you are accessing extremist material, you are breaching our regulations*'. But although Prevent-related monitoring is covered under the auspices of investigating into breaches of university regulations, they explained that Prevent cases are not treated in the same disciplinary way as other breaches: '*I wouldn't go down that route because it seem counterproductive to penalise students when they are at risk*'. Like P.B, P.J addressed the grey area of information sharing with the police under Prevent, saying that '*they could approach us and ask for details*', but that '*we normally only give information if those investigations relate to crimes*'. So in a scenario where the police were to ask for information under Prevent, P.J '*would rather expect them to have a two-way conversation with the University, where they would give us information on the student because we're concerned, rather than us just handing over everything we have about the student*'.

The policies of Universities P and Q state that they monitor; however, neither of them reveal whether this includes routine monitoring practices. Although Universities P and Q may

monitor to identify breaches of IT and university regulations, the policies do not suggest that they monitor under Prevent. P.P confirmed that their university does not rely on active, routine monitoring of individual usage, but that they

> *have a record. So we can track back. So if there was a concern… Nobody is actively monitoring but if we had a particular concern, either about a particular workstation or about a student ID or something, we would be able to go back a certain time, to check what pages they have accessed.*

P.P added that '*that existed before Prevent was introduced to the University*' and clarified that '*that's just part of having a backup system*'. Yet they revealed that '*we would consult the record if we had concerns about a student for other reasons, not because of their online activity. We might then do a search, to see what they have been looking at*'.

In a similar vein, P.Q declared that '*although we don't get notifications if a student tries to access an extremist website, we can go back and check if they did, if we had a concern. But we can also go back and check if people have breached university regulations. So that existed all before*'. However, '*before Prevent we did not access those records to investigate any welfare issues*'. Interestingly, P.Q considered the process of recruiting an individual's search history retrospectively as distinct from monitoring in response to police requests and establishing breaches of university regulations. They admitted '*maybe we should make this more clear on a policy level, that this is another reason for which we can reserve the right to monitor. We did include that in our annual returns to the OfS*'.

So far, the interviews have revealed two different approaches to monitoring under Prevent. Three universities decided to implement active monitoring mechanisms that capture individuals' access attempts to websites that are considered Prevent-related, while seven universities rely on their ability to access the records of individuals' online activity reactively in order to investigate Prevent-related concerns.

Another group of participants declared that they would consider the use of the same reactive monitoring method, although it is much less clear that this is a Prevent-related activity. University I's policies state that communications may be monitored and that this is justifiable in response to lawful requests for information from government and law enforcement agencies in order to detect crime. P.I revealed that in practice, the University does not rely on active monitoring in response to Prevent: '*we don't use that*'. When I asked them whether they would access an individual's records retrospectively if they had Prevent-related concerns, P.I told me that '*we would. We have the ability to utilise that policy and to do intrusive data collection or monitoring if we needed to*'. However, they also declared that '*we have not ever utilised that in relation to Prevent*', because they '*have not had a reason to require that for any student that we've been concerned about*'.

They also did not have any '*requests for information from the police under Prevent*' and '*the only time that we actually utilised that policy was in relation to a disciplinary case that had no Prevent relation*'. So '*whilst it's there as a tool that we could use, it's not been utilised*'.

While University I cannot be categorised as a case of turning to online monitoring under Prevent, it does provide an example in which the *possibility* of monitoring under Prevent has been integrated into existing structures that enable the University to monitor users' online activities in order to assist law enforcement in the detection of crime, and to identify infringements of their regulations. The same applies to University G, which, in line with the approach outlined in their policy documents, does not rely on active monitoring. P.G told me that they '*do not have mechanisms to receive immediate alerts if somebody accesses an extremist website*', and although '*there would be the opportunity*' to look at a student's search history if they were concerned about them being drawn into radicalisation, they '*have not done that*'. Here, P.G did not disclose whether not doing so is the result of an active decision or of the perceived lack of necessity.

The participants from Universities E and F, whose policies declare that they do not routinely monitor individuals' activities, confirmed that '*we don't monitor*' and that they '*don't have any sort of high-level filters*' (P.E) that notify them if a student tried to access a Prevent-related website. P.E confirmed that '*like anybody who provides internet services, if we got a good reason to go and check somebody's search history, we are able to do that*'; however, '*there has to be a legal ground for doing so*'. For P.E, the Prevent legislation constitutes a legitimate reason '*if we felt there was sufficient grounds to do so*', but at the same time they stated that monitoring may only be justified '*if there was a security concern*'. When I asked whether Prevent-related concerns are considered 'security concerns', they somewhat evasively told me that '*if we were trying to understand where the risks might be*'. P.E emphasised that '*we don't really filter, and our approach is not really different to what we have done before*'. In response to other legislation '*we were already committed to assist*[ing] *the prevention of crime, as reflected in our policies*'. P.F added that '*we have a high threshold for what has to happen for such investigations to be justifiable*'. Neither of these two participants was able or willing to provide any example of previous investigations, and while they confirmed that they can monitor individuals' internet activity, they remained vague about whether they do so under Prevent.

In a similar vein, University N's policies declare that they routinely monitor 'from time to time'. While they may do so in order to investigate breaches of university regulations, the policy does not indicate that monitoring may occur in response to Prevent. P.N2 revealed that on the ground, the University does not rely on routine monitoring of individuals' IT usage: '*at the moment, we don't really do that active monitoring*'. Like all other universities they '*do have the capacity to log peoples' internet usage. If I was suspicious of something, I could look what people had accessed. And we keep those logs for a number of months*'. P.N2 does not get alerts if students access

extremist websites and re-emphasised that '*we don't actively monitor. Unless we had suspicions*'. Yet those suspicions do not seem to be Prevent-related; rather, they '*would be disciplinary or a request from the police or the intelligence services, who need information in investigations*'. At the same time, P.N2 told me that '*we have two active information requests from the police and one of them is an extremism-related issue, so I let the Prevent Lead know. And then they would make a decision if we would need to formally consider that under Prevent*'. They explained further that when requests come in

> *from an intelligence officer (...) first of all, I speak to them and request as much information as they are willing to give about the nature of the offence or the nature of the suspected offence. If it's terrorism or extremism related, I will give the Prevent Lead details once I have identified the individual. They can then decide whether they need to report that individual to Channel.*

The interview with P.N2 showed that the University's policies and on-the-ground approach are congruent in so far that the University does not access individual's information in response to Prevent for any other reasons that external requests.

As opposed to all the above cases, two universities explicitly decided against any form of monitoring under Prevent. In doing so, they followed their policy statements. P.A explained that '*we debated this and some of us were very, very strongly opposed to this*'. In line with all but Universities K, L, and O, they do not actively monitor individuals' activity. When discussing monitoring, they '*decided very firmly not to surveil,* [or] *to have a keyword technology*' that enables the University to track whether students access extremist material: '*if IT Services do so, they are in breach of the university policy because we determined that we wouldn't use that sort of software, that this wouldn't be part of our Prevent response*'. When I asked P.A whether the University would consider consulting the IT records if they were concerned about a student, they told me that '*the policy is not to do that*' either.

University C's policies state that they reserve the right to monitor, and when I asked them whether this right relates to the Prevent duty, they told me that '*the policy is referring to disciplinary situations and police requests. We can go back and look at what you said in email and things like that, if we felt that there was a need to do that kind of thing. But that is not related to Prevent*'. P.C further emphasised that this is '*very different from monitoring*', which in their view implies '*watching you in the live environment, what you're looking at now, and we don't want to do that*'. When I asked whether they would consider looking at a student's search history if somebody raised a concern, and if they had to decide whether to refer them to Channel, they told me: '*we could but it would only be under the most serious of cases*'. This would '*not be appropriate to be doing regularly in a routine kind of way*' and they would only consider this '*if we thought somebody poses a serious risk to themselves*

and others', and '*only, and this has never happened yet, if we got a request from the police as part of their investigation*'. P.C then made clear that this activity is in fact not at all related to their Prevent response, because '*if we thought that they* [a student] *were such a risk to themselves or others, we'd be in the space where we would be telling the police already*'. They further emphasised that '*it would be very unlikely that we were getting to a situation where we would be looking at students' online activity without their consent for the purposes of Prevent*'.

6.2.4. Conclusion

The juxtaposition of the policy documents and interview data (see Table 6.2) brought to light that the on-paper policy approach does not necessarily reflect the on-the-ground enactment of monitoring procedures. The interviews revealed that policy documents are often incomplete and do not provide sufficient information to be able to anticipate how universities respond to Prevent in practice. Moreover, they confirmed that universities may not alter their policies under Prevent, because they consider their new procedures to be consistent with their existing policy formulations, which were articulated in response to other legislation and regulations developed prior to Prevent.

A combination of the document review and interviews with Prevent Committee members of seventeen universities enabled me to identify four approaches to monitoring under Prevent. First, three universities introduced new measures that enabled them to carry out real-time online surveillance of individuals. Second, two universities explicitly declared that they decided against any monitoring activities under Prevent. Third, a group of seven explained that they reactively access students' search history under Prevent. When outlining their monitoring procedures, participants said that they do so in order to evaluate whether an activity is related to Prevent, to respond to concerns about students being drawn into radicalisation or even terrorism, to collect information for deciding whether to refer an individual to the police's Channel programme, or in response to requests issued by the police. While the remaining five participants positioned themselves against proactive monitoring, they remained vague about other forms of monitoring under Prevent. §6.3 will provide detailed analysis of the justifications for and against reactively monitoring individuals' online activities and will discuss potential implications for the securitisation of education.

6.3. JUSTIFICATIONS FOR THE MEASURES TAKEN IN RESPONSE TO PREVENT

6.3.1. The relationship between risk perception and policy enactment

While the document analysis suggested only limited 'change of action' after the implementation of Prevent, the interview data has so far supported the suggestion that at least several universities have contributed to the successful securitisation of education by voluntarily introducing new control measures to address the threat of online radicalisation. While the first two sections of this chapter have focussed on *how* universities implemented Prevent in their IT policy area, this section examines *why* they decided for or against blocking and monitoring mechanisms. Exploring whether justifications refer to the threat identified and declared in the securitising move further contributes to the evaluation of whether Prevent has led to the successful securitisation of education.

The following sections shows that decision-makers' perception of their institutions' and students' risk profile not only informed their attitudes towards Prevent as a whole (see § §4.2.2 and 5.2.1), but also their approaches to monitoring and blocking access to extremist material. As P.B3 put it, '*different universities have different senses of their risk, and different Chief of Information Security Officers or school directors have different ideas of whether it is appropriate to allow such risk, or whether we need to put some technical controls in place*', adding that this variety extended to the individual level: '*if people have got a particular agenda, then that's going to influence whether you get a kind of rigid approach to filtering or not*'. P.L likewise felt that '*where you have autonomous bodies that are in charge of this duty, you get scope for there to be diversity*' which '*arises from people who are personally involved*'.

The case of University O provides strong evidence for the suggestion that a 'high risk' profile translates into a more rigid approach to monitoring and blocking. §4.2.2.3 proposed that University O, as a high risk university, is likely to be subjected to increased oversight by the OfS. A combination of increased compliance pressure and a heightened risk perception determined by its location in a Prevent priority area, as well as a self-described *'highly diverse*' student profile (P.O), led Prevent Committee members to ensure that they take the risk of radicalisation at their university particularly seriously. P.O explained that they decided to implement the discretionary options of filtering and blocking under Prevent to ensure that '*we are doing what we can to protect our students from the threat of online radicalisation*'. They explained that '*risks can never be fully mitigated*' and that there are inevitably *'forces that are beyond our control'*. In light of the lack of certainty that '*nobody at our university will ever* [become] *radicalised*', the University implemented proactive forms of monitoring and blocking. As P.O put it '*if something happens, we don't want to say "we could have prevented that, if only we had identified the problem earlier"*'. While the new measures served as an insurance for the University in case of any issue occurring, P.O also explained that '*we haven't had repeated incidents of students trying to access content that is highlighted, to the best of my knowledge*'.

However, the link between a university's risk profile and the enactment of web filtering and monitoring is not always straightforward. For example, Universities L and K implemented proactive online surveillance mechanisms despite the low risk perception of radicalisation on their campuses. Rather, P.L's decision to introduce comprehensive surveillance mechanisms was based on a past incident: '*One of my formative experiences in Prevent management came from a university I worked previously, where I was in a similar student service overseeing role*'. Here, '*one of our students on my watch went to Syria and died fighting for ISIS, and we didn't know until we read the report about their death. We didn't even know they weren't there*'. This incident became '*one of my go to places*' and their major justification for the means introduced to respond to the threat posed by radicalisation:

> *I have related that story several times in discussions. I think it's okay to be open about those realities. Prevent is a duty that many people have lot of different perspectives on, and I think this is very legitimate. They are worried about becoming a surveillance society and they have security service anxieties. But the reality is also that there are predatory people who are taking advantage of students' vulnerabilities. And I say our primary duty is to take steps to protect them from that. That's how Prevent is framed and that's very much a shared ethos here.*

P.L acknowledged that their previous university, which just like University O is a '*large, London-based and hugely diverse*' institution, has '*little similarities*' with the small, monocultural, rural based University L that is not considered a high risk university. However, shaped by the experience that '*you can't just rule out that this isn't gonna happen at your university*', P.L decided to compensate for this uncertainty by introducing the same approach to monitoring and blocking that they would have chosen to implement at a University considered as higher risk than University L.

In contrast, P.D, as a member of a large university located in a Prevent-priority area, was acutely aware of the radicalisation threat to which their students are exposed. However, as opposed to Universities L, K, and O, they decided against proactive monitoring and blocking mechanisms. For P.D, those measures were not feasible in light of the *'institutional culture'* of their research-intense Russell Group university. P.D explained the relationship between the risk perception and monitoring and blocking:

> *If you can see that radicalisation is or could become a problem in your area or for your students, you might be more inclined to look at everything they are searching online, and maybe you block certain sites. But that only works if that agrees with your institutional values and your mission. Some*

institutions of higher learning have historically placed more emphasis on their safeguarding role. Others have to take a less protective stance, in defence of academic freedom and free inquiry.

P.D also maintained that '*universities who don't see the risk of radicalisation on their campus are even better placed to prioritise*' their freedoms. Correspondingly, P.C3 explained that '*we had the conversation about web filtering – it's not that we haven't thought about it – but on a risk-based approach* [we] *decided that that was not an approach that we wanted*'.

Several participants confirmed that while risk estimations informed their decisions regarding monitoring to a certain extent, a variety of different, sometimes competing, considerations determined the policy enactment on the ground. Chapter 4 uncovered that individuals in decision-making positions have different attitudes about the Prevent duty, hold different beliefs about their university's roles, responsibilities and priorities, and have different understandings of their duty of care and their students' vulnerabilities. Consequently, the investigation into the reasons for and against blocking and monitoring under Prevent reveals that the enactment of Prevent on the ground is the outcome of the decision makers' considerations of (1) their personal attitudes and experiences; (2) the risk profile of their institution; (3) their student demography (4); their universities' values and missions; and (5) the extent to which they experience compliance pressure with governmental regulations. Different individuals prioritise different considerations, which in turn results in distinct approaches to monitoring and blocking on the ground.

6.3.2. Justifications for and against monitoring and blocking access to extremist material

6.3.2.1. *Student vulnerability, resistance against online surveillance, and institutional cultures*

This section draws out in more detail the above justifications for and against monitoring and blocking. P.D explained that universities' student demography plays an important role in any decision around filtering and monitoring under Prevent: '*when it comes to implementing Prevent* [in the IT area]*, we have to ask ourselves "how susceptible are our students to online radicalisation"*', and P.G confirmed that in order to make informed decisions, '*you have to know your students. What is the make-up at your university?*'. Chapter 4 revealed that universities not only consider themselves at low risk when they are located outside of Prevent priority areas, but also when their student body primarily consists of well-educated, socio-economically advantaged students. Not coincidentally, the prestigious, high-ranking Russell Group universities host the majority of those students, which in turn contributes to a lower risk perception at those institutions. P.B3 explained that this has tangible consequences for policy implementation. Their university

refrained from blocking and pro-actively monitoring access to extremist material primarily because

> *we're not your typical UK university. We are selective, we've only got about a thousand undergraduates a year, and we've only got about 11,000 students in total. The majority of our students are mature postgraduates, and we had the feeling that all in all this* [e.g. the university's size and student demography] *posed less risk than the kind of big teaching universities suffer. And when we considered whether we should filter or not, we decided that on the basis of the risk that we felt was posed to our students, that there wasn't enough of one to justify filtering. So we didn't.*

This statement shows how the factors that shape decision-makers choices are interconnected: structural factors related to University B's small size and to their mostly mature student demography not only converged to shape their low risk estimation, but also informed the process of policy enactment.

Similarly, P.I noted that

> *one of the things that struck me about different people's approach to Prevent is that all universities, whilst they're part of an overall national structure, they are contextually specific. Obviously, everybody makes an assessment on the basis of the risk that they perceive in their area, you know, it depends on your locality. It depends on the students that you're recruiting.*

In light of their low risk, some universities were able to evaluate whether the benefits of protecting students from radicalising online influences outweigh the potential drawbacks associated with the means deployed to do that. Not only did their student demography feed into the risk profile at their university, it was also at the heart of their considerations of the drawbacks of monitoring and blocking. Here, participants were aware that Prevent was met with suspicion among students, many of whom considered the duty to be a way of covert intelligence gathering. P.G was '*aware of the concerns with Prevent being, you know, we're all spying on everyone. But that's absolutely not the case. And we've been very clear to say that we do not do monitoring, we're not spying on what people are doing. And that's always been the case*'. While P.G's decision against proactive monitoring was informed by the ambition not to alienate their suspicious student body, P.L explained that it was possible to introduce their controversial online surveillance system because their students did not rebel against this approach:

> *University L's students are not as concerned as some of University K's students. We ran several student engagement events on Prevent and our policy around monitoring, and people didn't come around. Then, as a separate activity, we required everybody to re-authorise their accounts based on a change to the terms of conditions of use, which included and highlighted this change in the policy. So we really put it in front of people's faces. You couldn't get onto our IT without reading something about Prevent – we absolutely didn't want to hide it.*

P.L found that there '*wasn't much noise about it, and not much interest or discussion. It was very interesting*'. They concluded that '*there are certainly student demographics that are likely to be more accepting. Certainly that is my impression here, at University L*'. In turn, P.L was able to introduce their measures precisely because they seemed to have met the expectations of their students:

> *We definitely have a very different cohort in University L and also in University K than they have at University A. Our students expect the University to take care of them. They've got very high levels of expectation around what the University will know, how the University will share information in order that they will be looked after*'

Overall they found that '*University L students are not as independent as University K students in comparison. There is more of a willingness to trade privacy for care*'.

P.L's comparison between the students at Universities L, K, and A is particularly interesting, because it supports the suggestion that the prestigious, pre-1992 Russell-group universities (which include Universities A, B, C, and K) have a more confrontational student body that is less likely to compromise their privacy in return for security and care. In the case of University K this has led to a scenario in which the University initially decided against monitoring, adopting the proactive approach assumed by University L only because of practical technicalities (see §6.2.3 above). University A would not have been able to get away with such a move: while University K hosts a student body that is more active than University L, P.A was confronted with '*a myriad of suspicions that we are spying on our students online under Prevent*' without having ever introduced any monitoring and blocking tools. In the case of University A, their students' suspicion of Prevent was shared by university governance, who took a particularly strong stance against online surveillance under Prevent. Just like their students, members of the University's Prevent Committee raised concerns that Prevent would oblige them to '*keep them* [students] *under surveillance*'. In their view, '*blocking and monitoring would introduce an atmosphere to the University that was not conducive to free inquiry and mutual confidence*'. P.A emphasised that '*the*

idea that we are tracking in any way what people were doing online, that generalised form of surveillance, was not met with any approval here'.

When I told P.C of the monitoring method carried out by University L (which I anonymised in the conversation), they dryly responded:

> *I can't ever see that flying here. Our students would rip me to shreds if they thought we were doing that. It's not me being complacent about things. But I just don't know how you even approach the conversation with the students and say "look, we've been looking at what you look at online, and we're concerned".*

They added '*it's just inappropriate in a trusting, adult environment*'. Other participants agreed that the active monitoring mechanisms carried out by Universities L, K, and O constituted an invasion of students' privacy and thus a betrayal of their trust. According to P.C, their University decided against blocking access to extremist material because that did not align with their '*trusting, adult learning environment*'. For them, University L's approach to monitoring implied that '*if you're in that kind of territory, your trust and your relationship with the students has gone*'. They disapprovingly added that '*it terrifies me to think that other universities are looking at students' private activities under Prevent*'.

Likewise, P.I did not '*think it's appropriate*', not only because '*it's not required*', but particularly because '*it's not the community standard that we're trying to set. It's not the environment we want to have*'. They explained that the University was aware of the fact that '*there is a lot of concern about Prevent as a spying tool*' and that their student body is particularly concerned about privacy invasions in relation to online surveillance: '*our policies give us the possibility to monitor, and students came back to us and said "you're spying on us all the time*"'. P.I assured them that '*we don't have the capacity to do that, and we don't have the interest in doing that*'. Mindful of the concerns sparked by the Prevent duty, they decided '*to take a balanced and moderate approach*'.

The extent to which individuals in decision-making positions attributed importance to trust and privacy did not merely depend on students' reaction to the Prevent duty, but, once again, on policy actors' personal experience. As P.I put it: '*people often start from the assumption of a threat, that this will be there, and we need to find it. Therefore we need to spy on lots of people. I think we need to start from the perspective that actually, the vast majority of our students and staff will not be in this category*'. P.I also explained that as a former union activist '*it's because of the background that I've come from that I believe that you don't build a good, inclusive culture by saying we need to surveil our audience*'. Their view reflected the wider culture of their university:

The culture I came into here was that actually, we are an academic institution that is about freedom. It's about the freedom for the development of thought and ideas. And yes, there are limitations to that, but it is exactly about where you draw those boundaries. And if you draw those boundaries too tightly, you don't create a comfortable learning community. What you do is you breed fear and distrust, and that's the opposite of what we're trying to do.

6.3.2.2. *Research activity: a reason against blocking*

Participants associated with the research-intense, pre-1992 universities explained that they had to weigh the benefits of protecting their students from radicalising influences online against the risk this may pose to their research activities. As pointed out above, blocking clashed with the *'free inquiry'* that P.A said their university aimed to protect. P.D found that blocking mechanisms are incompatible with their university's research activities. For P.I, monitoring and blocking restricts the freedom of the development of thoughts and ideas. P.M explained that they refrained from monitoring on an active basis because '*within our institution, a lot of research might be about counter-terrorism and ideology*'. In a similar way, P.B declared that they took their decision '*to the information security advisory board, and the decision was that we weren't going to block things based on the danger of radicalisation*' for '*a number of different reasons, one of which is that we believe that it would have a chilling effect on research. And we don't want to do that*'. P.H confirmed that '*our view has very much been that as a university, our stance from the beginning was that we don't filter or monitor websites*' because '*in a university that conducts research into everything that's going on, you can't start filtering things out, because that's then going to prevent staff and students from being able to conduct their research effectively*'. P.C echoed this reasoning and pointed to the '*counter-productive effect on research*' that active monitoring would have. Similarly, Universities E and F do not monitor because '*as a research-intense university, we felt that it wasn't sustainable*' (P.E); P.F agreed that '*blocking and monitoring would clash with our research activities*'.

While P.E noted that '*maintaining a high-level filtering system has a significant overhead, both in terms of time and cost*', they emphasised that this was not the main factor that shaped their decision: '*fundamentally, we don't want to be restricting people's access to information and knowledge*'. P.E confirmed my observation that some research-intense universities seem to be less prone to implementing blocking mechanisms, and that they '*don't have the sort of active filters that some of the post-92 universities have implemented*'.

With the exception of University K, which has subscribed to the approach of its teaching focused, post-1992 neighbour, the interviews indicate that research intense pre-1992 universities tend not to block access to extremist material, while newer, teaching focussed post-1992 universities seem to be more likely to do so. It will be recalled that out of the seventeen

universities that formed my sample, eleven are research-intense Russell Group institutions, and the other six are post-1992 universities. Only one Russell Group university chose to block access to extremist material in response to Prevent. In contrast, four of the six post-1992 universities restrict access to Prevent-related material. The dataset is not large enough to be of generalisable significance, but it offers preliminary confirmation of the importance of research activity in universities' decision whether to block websites or not.

6.3.2.3. *Conviction of the effectiveness of blocking and filtering*

In addition to the research-related issues associated with blocking, participants also noted the lack of effectiveness of monitoring and filtering as tools to identify and prevent the process of radicalisation. P.B3 stated bluntly that

> *one thing to realise is that all technical controls are stupid. If I want to circumnavigate a filter that is imposed at the school, I simply take my phone off the Wi-Fi and use 3G. Job done. So the filters are kind of daft. It's not going to stop you from using a three dongle on your laptop when you're sitting in class, if you so choose. All that it's gonna do is stop you from using Eduroam.*

P.B3 also noted that they '*don't have the resources*' for any effective monitoring:

> *We've got 4,000 members of staff and nearly 20,000 students. We'd need hundreds of people sitting there going through all that information to see what they're looking at. So from a practical point of view, even if we did think morally it was the right thing to do, in practice we don't have the resource to be able to do that effectively anyway. So what would be the point of monitoring?*

Similarly, P.C held the view that '*in terms of a protective factor*' blocking and monitoring '*means nothing*'. They elaborated that '*all it means is that your students aren't going to get radicalised while sitting logged into a hardwire machine in the library'*. Just like P.B, they acknowledged that '*everyone's got a smart phone, everyone's got a laptop; you don't have to access the internet via the Wi-Fi provided by the university*'. Consequently, '*when you start on picking that, you realise that it means nothing if you are filtering because it's so easy to bypass it, you just don't need it*'. In the same spirit as P.E, P.C pointed to financial considerations: '*you have to invest significantly in your infrastructure to put blocking in place*'. However, this was not their major concern. Rather, they emphasised that '*the impact of that is absolutely miniscule for the return of the investment, because it's not going to stop somebody from getting access to that information*'.

Likewise, P.G1 reported that University G '*doesn't filter or monitor*' because '*it's absolutely pointless*'. In their view, '*most people are radicalised on their smart phone, which is not connected to university IT. People are not going on Eduroam for that sort of stuff*'. The participant acknowledged the potential threat posed by online radicalisation, but they did not consider the benefits of blocking and monitoring extremist material to outweigh the potential drawbacks that come with doing so. Moreover, P.G2 explained that not giving students the possibility to freely access online material enforces a '*point of view of thinking of the student as a bad actor, that they are looking to be radicalised*'. In their view, it is not – or should not be – the role of the University to restrict students' freedoms in order to protect them from radicalisation, particularly in light of the numerous opportunities for '*people outside, their contacts, their friendship groups*' to '*get at* [i.e. radicalise] *the students*'. P.G1 added that '*we are not able to control what everyone in our students' environment is exposed to. They* [people in the student's environment] *are not going to use Eduroam*'. While monitoring may enable the university to '*possibly pick up the odd one or two percent, we don't want to provoke a backlash saying, "right, we're going to monitor all your communications". Especially since our risk is so low anyways*'. This statement is particularly informative, because it reveals several interconnected factors that inform University G's decision not to employ monitoring and filtering: P.G1 and P.G2 called into question the effectiveness of blocking and monitoring as a way to prevent radicalisation, pointed to the possibility that controlling their students would harm their relationship, and considered the risks and benefits in light of their low risk perception.

6.3.3. Blocking between safeguarding and security

The interviewees also expressed a variety of different perspectives on the implications of blocking for safeguarding and security. P.N2 was under the impression that blocking would be damaging for the work carried out by security agencies:

> *I think the security services want people to access the material. Because then they know who is accessing it. So they want people to find the material so they know who to trace. And although politicians talk about shutting down these sites, they are actually useful for the security services, for gathering intelligence.*

They went on to elaborate:

> *they don't admit it, but I think intelligence agencies put extremist material online to get people to view it, and then they can log the IP address. And they want to know from us, because if it happened here,*

> *the general IP address would be the University, they would typically ask for the name and contact details, but they can also ask for active surveillance. For enhanced monitoring of an individual, or for information about what they are doing on our network.*

So in the view of P.N2, blocking under Prevent would actually be counterproductive for their wider aim of making a contribution to national security, because '*they* [the intelligence agencies] *also wouldn't want us to block* [extremist material], *because if we don't, we can give them more important information*'.

In contrast, P.P felt particularly uncomfortable about the role universities are expected to play in counter-terrorism related intelligence gathering, and explained that the chosen approach to web blocking was actually informed by an active effort to re-establish the boundaries between welfare and securitisation: '*monitoring could be understood as intelligence gathering. So actually, in a sense we are being fair by blocking*'. They elaborated that '*we block, so we don't know who wants to see it; whereas they could accuse us of gathering intelligence if we weren't blocking, but then monitor and report*'. P.P '*wouldn't get involved*' in monitoring, because '*it's very clearly about safeguarding for us. It's about preventing them from seeing things that could make them more vulnerable*'.

But there were yet more perspectives on the issue. P.C agreed with P.N2 that blocking is counterproductive for ensuring national security, but for a completely different reason. They not only questioned the effectiveness of blocking per se, but also explained that blocking certain extremist websites in fact increases the risk of '*breeding the sense of injustice*' that students who have experienced '*political grievances*' may feel '*when they can't access certain websites*'. As they elaborated: '*how would a Palestinian student feel if we'd suddenly blocked Hamas' website? They would feel like we are part of a wider conspiracy, and that we would censor voices who express the struggle of Palestinians under Israeli occupation*'. P.C agreed with the RCs' view that '*silencing political injustices can be dangerous*', and an important risk factor in the radicalisation of vulnerable individuals.

The insights provided by P.N2, P.P, and P.C, are particularly interesting because they show that blocking access to extremist material under Prevent does not always indicate audience acceptance, and in turn, refraining from blocking does not necessarily indicate audience rejection. All three participants consider blocking as counterproductive for ensuring national security. While P.N2 accepts that they can play a role in the prevention of terrorism by sharing intelligence and therefore does not block, P.C rejects their role in ensuring security and consequently rejects blocking in response to the threat of radicalisation. In contrast, P.P considers blocking an effective way to safeguard their students from radicalisation, and considers it a sign of their rejection of any securitising activities. P.P's decision to block access to extremist material occurred in an effort to draw a distinction between securitisation and safeguarding:

blocking appeared to be a reflection of their university's resistance against the security apparatus of the state by preventing themselves from obtaining information that would tighten the institution's relationship with security agencies. And, adopting yet another perspective, P.Q, while agreeing that '*if you know things, you will be expected to share*', believed that refraining from blocking enables universities to contribute to both security as well as safeguarding under Prevent: '*I believe many universities now know more about which students are at risk so they can actually share more*'.

Several other participants displayed similar attitudes to those of P.P; however, they considered blocking access to extremist material under Prevent as a form of censorship, or as P.I described it, as a '*security practise that clearly goes beyond the scope and requirements of what universities should do*'. In a similar way, P.A explained that '*we are not in the business of censoring, not even in the name of national security*'.

P.L, P.M, and P.O, who were aware of the problems associated with censorship, noted that blocking access to 'clearly illegal' terrorist material was a rather conventional practice. P.L explained that they '*can't see a difference between blocking access to websites that feature child abuse and blocking beheading videos*'. In a similar way, P.M and P.O considered blocking access to illegal extremist material in line with their practice of blocking child pornography. P.M held the view that '*if you already accept that you have the duty of care to block child pornography, you don't have to think twice when it comes to blocking terrorist propaganda*', and P.O added that *'it is acceptable for universities to block access to a variety of different websites for plenty of reasons: from blocking access to ghost writing services to gambling and pornography, let alone child pornography. I can't see why we should make an exception for terrorism*'.

Others were acutely aware of the problems associated with censoring terrorist material. As P.N2 put it: '*while it is easy to determine that a website features child abuse, it is much less straightforward that an extremist website is or should be considered illegal*'. P.D agreed that '*blocking lists are quite controversial because not all of the things that are blocked are technically illegal*'. At University A, '*certain academics do feel very strongly about this. Who is deciding what is illegal regarding extremist material? They were saying "well who is making that decision?. Is it the counter-terrorism unit? Is it the Home Office?" It is, and in some cases, it is the actual provider themselves. It depends on where you get those lists*'. In light of the absence of consensus on how to determine the illegality of a variety of websites that feature extremist material, P.D decided that '*it is not our job to to make a decision about the legality of online material*'. The same reason constituted a contributing factor for University G's decision to refrain from blocking any material related to extremism. In contrast, P.J was not particularly concerned with taking a stance in the controversy surrounding the classification of extremist material as legal or illegal. They told me that while it '*may be an*

important academic matter', it went beyond their scope and responsibility '*in the student administration and welfare domain*' and added that the academics on University J's Prevent committee agreed with the decision that not only clearly illegal, but any extremist material that raises concerns among staff members could be blocked under Prevent.

In the view of P.C, who does not see the benefit of blocking and active monitoring, universities '*are mainly just doing it for reputational reasons*'. The interviews with participants whose universities rely on blocking mechanisms reveal that the reasons are more complex: participants chose to block extremist material because of their genuine conviction about the effectiveness of blocking as a safeguarding tool, because of their view that blocking is a way mitigate the security threat of online radicalisation, and even as a way of resisting the securitisation of their institution. Nevertheless, P.O admitted that '*very realistic compliance pressures*' reinforced their choice to adopt the voluntary governmental suggestion to implement blocking mechanisms. They told me that their University '*didn't have the privilege to indulge in theoretical debates around the legality of terrorist websites*', and explained that their decision to rely on an externally determined list of illegal material that includes extremist websites was also made to '*safeguard our reputation, in case something goes wrong*'. Despite this, P.O quickly added that the decisive point for their decision was the perceived effectiveness of blocking as a way to shield students from radicalising influences.

But P.O, like most others who emphasised the safeguarding intention of their measures, struggled to clarify whether the intention to prevent students from exposure to extremist websites ultimately served the goal of mitigating the security threat stemming from such material, or of ensuring the wellbeing of their students. They justified their approach primarily on the ground that '*we are acutely aware that extremist groups try to influence vulnerable people via a number of different means, and increasingly they do so online*'. In their view, young students '*can be trusting and uncritical, and they are not necessarily aware that they are being drawn into these groups, and that they start adopting extremist views*'. They also explained that today, '*young people are often used to viewing shocking and extreme content*', and that some might find '*tasteless content normal or even entertaining*'. On the one hand, P.O highlighted the necessity of protecting students '*because ultimately those groups are grooming them, they are forming relationships with them to ultimately abuse them*', which poses '*a detrimental risk for the psychological wellbeing of those vulnerable individuals*'. On the other hand, they explained that they are also '*vigilant of the risk that once they* [students] *are radicalised*' they are '*likely to be harmful*' to others, not only by using '*hurtful hate speech*', but also because of their '*potential involvement in violent activities*'.

P.M's framing of blocking as a safeguarding method revealed a similar conflation between considering the vulnerable individual as 'at risk' and as 'the risk'. They initially portrayed their

adult students as almost child-like and in need of protection: '*while anyone can be radicalised, young students are particularly easily influenced. They are often quite impressionable, they are in a new environment, which can be challenging. They may have low self-esteem*'. At the same time, P.M perceived such vulnerabilities as posing a significant threat. They adapted the narrative that radicalisation can quickly escalate into violence, because '*once they go down that road, they will be subject to peer pressure, they will be bullied into taking action*'. For this reason, '*it is important to reduce the possibilities that terrorists exploit them online*'. Although P.M acknowledged that they '*can't control the entire web*', they considered blocking the platforms of terrorist organisations as '*the least we can do*'.

P.J agreed that '*we have a safeguarding responsibility*' which does not only extend to those who are '*vulnerable to radicalisation*', but also to those '*who suffer harm*' because they are successively '*influenced by and exposed*' to the radicalised individuals' views and actions. Radicalisation is portrayed as a virus from which individuals ought to be shielded, not merely because of a concern for their personal health but also because they constitute a 'contagious' threat to others. Here we find that P.O, P.M, and P.J have accepted the securitising move in so far that they have adopted a presupposition of a 'river of radicalisation', that if un-intervened inevitably leads to violent extremism. Their comments provide evidence that the conceptual conflation between safeguarding and security, which lies at the heart of the Prevent duty, feeds into the justifications for the measures taken to address the threat.

However, P.G3 offered a drastically different perspective:

> *There are studies that show that not everyone who is considered as radical is a threat. Becoming a terrorist is not always a linear progression from being a radical person. Some might hold 'extreme views' and challenge the status quo, and they might be involved in political protests. They distrust the establishment and have some sort of identity crisis.*

Rather than perceiving radical students as a security threat, P.G3 relied on research that '*shows that those who engage in academic debates about their views, who have studied at universities, are less likely to become terrorists*'. In a similar vein, P.A rejected a conflated notion of security and safeguarding and added that '*shielding students*' from radicalising exposure '*infantilises them*' and '*constrains their curiosity*'. They added that

> *not everyone with an interest in extremist material is vulnerable. You also don't have to write a thesis on terrorism to be interested in learning more about political radicalisation. If you want to understand what is happening in the world, you may want to hear what right-wing extremists or jihadist groups have to say.*

Enforced by their institutional culture of trust and free inquiry, P.A considered blocking access to websites such as the Daily Stormer or Britain First as counterproductive and damaging for the intellectual development of their students.

6.3.4. Monitoring between safeguarding and security

Although all participants (with the exception of those who proactively monitor) expressed highly critical views of comprehensive online surveillance mechanisms under Prevent, they did not fully reject their role in identifying vulnerability to radicalisation on the ground of students' online activity. As drawn out in section 6.2.3., Universities B, D, H, J, M, N, P and Q rely on their ability to access the records of individuals' online activity reactively under Prevent in order to investigate concerns about students that were either raised internally by other students or staff members, or externally by the police. Interestingly, the low risk profile P.B3 referred to when they explained their reasons against blocking and filtering did not constitute a consideration in the University's approach to reactive monitoring. Rather, P.B3 explained that although they perceived their student body as largely resilient, they were not able to preclude confidently that no student at their university will ever be at risk: '*it is impossible to predict radicalisation*'. While P.B3 considered the proactive monitoring approach as a surveillance method that is irreconcilable with their institutional values, they felt that the practice of reactively investigating users' search history was much less of an invasion of students' privacy. They explained that this method '*is aligned with our overall approach to safeguarding*', precisely because '*it is a reactive approach, in direct response to safeguarding concerns*'. According to P.B3, this is '*completely different from assuming any problem by default, and from pre-emptively watching your students*'.

P.M agreed with this view, and explained that by reactively monitoring '*we are not spying on our students. We are merely responding to concerns*'. As a '*welfare and safeguarding measure*', reactively monitoring enables the University to '*get a better overview of the vulnerabilities*' of the student under investigation, keeping in mind that '*we only do that once somebody has raised a concern about their behaviour*', indicating that there '*might be a wellbeing problem*'. They went on to emphasise that they are treating Prevent related concerns '*just like any other safeguarding concern*', and elaborated that '*if somebody raised concern that a student had an alcohol abuse problem, that they miss their academic obligations due to drinking, and that their social relationships are negatively affected by their drinking behaviour, we would be equally concerned*'.

Likewise, P.J has adopted the position that radicalisation concerns are just as much a safeguarding and wellbeing matter as '*suspected psychological or sexual abuse*'. Interestingly however, they seem to have different thresholds from P.M for upholding students' privacy in safeguarding

and wellbeing matters that are not Prevent-related. For example, P.M – who accessed a student's search history under Prevent although the flagged website did not display any extremist material (see §2.2) – admitted that they would not go as far as investigating whether a student who raised concerns because of their drinking had regularly purchased alcohol online, followed social media profiles that encourage unhealthy drinking behaviour, or displayed other behavioural patterns that indicate vulnerabilities to addiction. In a similar vein, P.J would not try to trace online conversations of those suspected to be exposed to psychologically or sexually exploitative influences, which they related to the fact that students who may be exploited by non-extremist groups or individuals '*do not pose a risk to others*'.

These comparisons show very clearly that even in the eyes of those participants who justified reactive monitoring as a safeguarding measure, there is a difference between the safeguarding of individuals for the sake of their personal wellbeing and the safeguarding of individuals for security reasons. And although the two-way association between alcohol overconsumption and violent behaviour is not less established than the relationship between radicalisation and violence, P.M would not get the police involved to obtain further information about students whose unhealthy drinking behaviour became noticeable to other students and staff members. While they are '*invested in their students' safety and wellbeing*' they also felt that alcohol abuse is '*not uncommon for young adults who test their boundaries*'. Unhealthy alcohol consumption and associated consequences, albeit taken very seriously, are not considered abnormal or a security risk – English universities are well-known for their drinking culture – and consequently, related wellbeing concerns are not dealt with by collecting information about students' private online activities. In contrast, engaging with extremist views is not considered a 'normal' way for young adults to test their boundaries, and is therefore considered not only as harmful to the individual, but also as a security risk to others. Consequently, Universities M and J deal with safeguarding concerns associated with radicalisation differently than with other concerns. Again, P.M and P.J's justifications for relying on reactive monitoring reveal that the boundaries between safeguarding and security have become blurred under Prevent.

P.Q also suggested that reactive monitoring was an effective way to make a more informed decision about Channel referrals in line with universities' safeguarding responsibility: '*we have done that before when we were worried about one of our students. They changed their behaviour quite a lot and there were complaints from other students. It seemed relevant under Prevent and we wanted to collect some additional information before we got external partners involved*'. At the same time, they added that '*we also had cases before* [where] *we would access those records because we had a request from the police. They were trying to establish whether one of our students was involved in a crime*'. This statement further suggests that the practice of reactive monitoring was, at least originally, not meant to be

a safeguarding measure, but rather one designed to address security threats stemming from potentially criminal students.

Like P.Q, P.B3 explained that reactively investigating students' search history '*is our way of making sure that the concerns raised by others are justified*'. Rather than overzealously referring individuals to the police for a Channel evaluation, they '*collect as much information as we can internally*'. In this way, accessing students' online records is a means to '*deal with it* [a Prevent concern] *internally*'. This stance is in line with the University's broader wellbeing and safeguarding mission, because the practice of reactively monitoring '*prevent*[s] *the student from stressful and unnecessary interactions with law enforcement officers*', which in the view of P.B3 '*only makes the problem worse*'. As indicated in §2.2, participants did not only have different thresholds for when to access students' search history, they also seem to have different opinions about when to engage in intelligence sharing with the police under Prevent. Highlighting the grey area of intelligence exchange under Prevent, P.B aimed to keep the interaction and intelligence sharing with external agencies under Prevent to a minimum. P.J was equally unsure about the extent to which Prevent justifies information sharing about non-criminal behaviour with external agencies, but explained that they would comply for reputational reasons: '*if you don't report it* [Prevent concerns]*, and it then escalates, you don't want to be in that situation. The University makes a decision on what, as a reputational risk, what is the impact* [on the University] *if we don't report?*'.

Equally concerned about escalating threats, P.H explained that information sharing under Prevent was a direct response to the perceived threat posed by one of their students. This student's research group

> *observed that the student has become quite isolated. He stopped talking to people. He seemed to be a bit more religious than he was before, he was praying more. And he stopped talking to the females in the group. They noticed it but didn't think much of it. Then the supervisor picked up that the student was starting to be quite rude towards the female members of the group*.

P.H elaborated that '*I think he was from Iraq, and there was some sort of political discussion or comments that were made*', and that '*they started to get a bit cautious*'. And then, '*the supervisor came in on a weekend and found the student printing off a lot of flyers in Arabic, and when he asked the student what he was doing, he snatched them all of the printer, sort of shoved them into his bag and ran off basically*'. This behaviour made the supervisor '*very, very scared*', which is why '*she got in touch with me through the internal Prevent channels*'. P.H *'interviewed her with our deputy head of security to find out a bit more about what exactly had happened*' and '*then contacted the police and said, this is the situation, and we are quite concerned about this one*'. The police '*quickly said, yes, we are looking into him, we're going to take*

this investigation forward, and then they conducted some background checks and dealt with the situation themselves'. P.H admitted that this situation was not merely a safeguarding practice to ensure the wellbeing of the student, but '*an immediate response to what we felt was a potential threat*'.

Although most participants who relied on reactive monitoring were eager to justify their approaches under the umbrella term of 'safeguarding', they were eventually unable to demarcate fully those approaches from security practices: yet again, the dual perception of students as 'at risk' and as 'the risk' rendered their efforts futile. In the view of P.Q, it is impossible to distinguish between monitoring and information sharing for security or for safeguarding purposes under Prevent: '*it's not because we are snooping, that's not what Prevent is about. But we have the duty to see and learn of signs of vulnerabilities. Universities have a duty of care to prevent terrorism, and in order to care, we need information*'. For them, security and safeguarding are essentially the same side of the coin, as law enforcement and intelligence agencies '*basically need information for the same reason*'.

In contrast, some of the participants who did not engage in any form of monitoring under Prevent challenged the view that monitoring could in any way be carried out in the name of safeguarding and called into question the inseparability of safeguarding and security. For example, when I explained to P.C3 that some universities access students' search histories in response to welfare concerns, they responded with incredulity: '*so as a welfare activity they are looking at somebody's web history? Really?*'. In light of the fact that implementing Prevent in the IT area '*is completely optional, it is not a legal requirement*' they explained that it is possible to resist securitising activities in response to the duty:

> *You don't have to look at their personal stuff to show them that you care. We have Prevent as part of our welfare approach because if somebody was drinking too much, I'd be worried about them. If I thought they were being radicalised, I'd be worried about them. So in a sense we have all kinds of students who we are concerned about, who are in a sense flagged. And we monitor them by doing welfare checks, that kind of thing.*

Interestingly, P.C also drew the common analogy between radicalisation and alcohol abuse. However, as opposed to P.M and P.J, their example highlighted a consistent approach that did not conflate their safeguarding purposes with security intentions.

Similarly, P.A told me that in the case of their student who was accused of encouraging others to join the Hizb ut-Tahrir (see 2.4.1), they did not access their online history to investigate these allegations: '*instead we talked to the student and could establish that those accusations were false*'. The insights of P.A provide an example of a situation that received immediate attention under

Prevent without using monitoring mechanisms in response to a possible threat. For both P.A and P.C, reactively monitoring was equally unjustifiable under Prevent as actively monitoring students' online activity.

6.4. Conclusion

My analysis of universities' enactment of Prevent in the IT area has yielded several important findings. First, the juxtaposition between policy documents and their on-the-ground enactment has contributed to a nuanced analysis of universities 'real' implementation of Prevent. The gap between policy and practice that has been revealed supports the assumption that any evaluation of the securitisation process has to take into account 'on-the-ground' evidence. This has important implications for practical considerations of how to measure or evaluate securitisation.

The uncovered gap also challenges the reliability of policy documents as the primary sources of analysis in higher education policy evaluation.

Secondly, this chapter has found that the institutional diversity of English universities translates into different approaches to implementing Prevent. Factors associated with universities' size, student demography, locality, decision-makers, culture and values, research activity, prestige, and risk profile complement and vie with each other to shape different policy enactment outcomes.

Finally, the findings of this chapter suggest that any simplistic claims about the 'securitisation of education' do not hold up to a detailed analysis that takes into account university governance's justifications for the measures introduced in response to the threat of radicalisation. Some cases, namely Universities K, L, and O, provide compelling evidence for the securitisation of education: they have been drawn into the security apparatus of the state, not only by virtue of accepting and perpetuating the dominant securitisation discourse, but also through their enactment of policies that go well beyond traditional measures of welfare and safeguarding. In contrast, Universities A and C have fully rejected the securitising move by challenging the perception of students as risk factors and by limiting their Prevent response to their initial safeguarding and wellbeing frameworks. The other universities find themselves on a spectrum of securitisation, where certain elements are accepted and others are rejected. Those cases provide evidence for the conclusion that Prevent has contributed to a conflation of safeguarding and security, an outcome which has in turn generated sometimes contradictory justifications for relying on reactive monitoring and blocking under Prevent.

7. CONCLUSION AND DISCUSSION

On the basis of over seventy policy documents and interviews with twenty-one Prevent committee members from seventeen universities and three RCs, this thesis has explored (1) how English universities have responded to the objectives of the Prevent duty, and (2) whether they engage in securitising activities through their enactment of Prevent. Drawing on securitisation theory, Ball's theory of policy enactment, and Lipsky's understanding of 'street-level bureaucracy', I have evaluated whether Prevent has generated 'university securitisation', by leading universities to move out of the sphere of what 'are perceived to be normal university politics' (Gearon, 2017, p. 4).

7.1. THE CONFLATION OF SAFEGUARDING AND SECURITY

The first findings chapter (Chapter 3) shows that RCs reacted to university administrator's initial rejection of Prevent by appealing to institutions' culture of care towards their students. In their effort to de-securitise Prevent, the RCs highlighted the duty's singular emphasis on safeguarding, and in turn framed the various risk mitigations they advised universities to implement as safeguarding practices as opposed to security measures. At the same time, they made clear that vulnerable individuals are not only perceived as the potential victims of exploitation by radicalisers but also as potential threat sources. Here, they relied on the narrative that susceptibility to radicalisation, if left without intervention, inevitably manifests itself in violent extremism and terrorism. In turn, safeguarding measures designed to respond to the threat posed by radicalisation differ from traditional safeguarding and wellbeing approaches designed to respond to concerns associated with mental health or alcohol abuse concerns. In particular, universities are encouraged to carry out the 'safeguarding' practices of online surveillance and of reporting vulnerable individuals to law enforcement agencies. In turn, the RCs' narratives and the proposed safeguarding practices contained in the Prevent duty guidance reinforced a conflation between safeguarding and security under Prevent.

McGovern (2016) argued that 'safeguarding and a duty of care' are 'securitised in the name of counter-radicalisation', and that Prevent has manifested itself as an 'infantilising model of securitised child protection' (p. 54). Moreover, he predicted that universities would be unable to resist Prevent, which 'enmeshes and deepens further a culture of compliance' (p. 49). Durodie (2016) predicted compliance with Prevent because it corresponds with the 'therapeutic culture' of universities, which 'already assumed and implemented many of the measures proposed' (p. 25). My study provides evidence in support of the claim that Prevent has led to the securitisation

of safeguarding, and shows that an increased emphasis on universities' culture of care has led to high levels of compliance with Prevent. In particular, §4.3.1 shows that the re-framing of Prevent as a welfare rather than a security issue seems to have occurred in dialogue between state agencies and (some) universities, where the latter's criticism and consultation provided insights into the arguments and views that promised to lead to higher levels of acceptance across the sector. Some universities' emphasis on their roles and responsibilities as carers for their vulnerable students has been adapted as the main rationale for RCs to request compliance.

In §§4.3.2 and 4.3.4, I further find that all universities have integrated Prevent into their existing approaches to safeguarding. This integration of Prevent into previously existing safeguarding structures cannot be interpreted as a sign of securitisation: internally, radicalisation concerns are dealt with in the same way as any other safeguarding concerns. However, universities' safeguarding approaches under Prevent are not confined to internal safeguarding structures. As outlined in §4.3.5, all universities expanded their previously existing structures by developing relationships with police and prevent practitioners in order to escalate Prevent-related safeguarding concerns externally. This 'safeguarding practice' is unique to concerns related to radicalisation. While internally universities may treat radicalisation concerns in the same way they would treat mental health and alcohol abuse issues, they have also developed referral mechanisms which – prior to Prevent – were exclusively used to report criminal activities. In this way, my findings support McGovern's claim that safeguarding has become securitised, and show evidence that Prevent requires universities to move out of the sphere of traditional safeguarding.

7.2. Making sense of the pre-crime space of Prevent

A central concern in the literature on universities' involvement with Prevent is the duty's focus on the legally ambiguous concept of non-violent extremism. According to several commentators, this focus assigns to universities the security role to censor lawful speech and to report individuals to law enforcement agencies without evidence that they are likely to be involved in criminal activities. McGovern (2016) predicted that under Prevent, universities would 'restric[t] inquiry and speech in the name of academic freedom and promot[e] distrust, inequality and alienation in the name of protection and a duty of care' (p. 49). My thesis sheds light into the way in which seventeen universities dealt with the legally ambiguous concept of non-violent extremism on the ground. In particular, §4.4 examines my participants' approaches to reporting concerns about non-violent extremism externally, §5.2 shows how universities deal with the expression of non-violent extremist views as part of their external speaker procedures, and §6.2 explores

universities' approaches to blocking and monitoring access to websites that contain legal extremist views.

7.2.1. External reporting

Overall, the findings suggest that universities have embraced the concept of 'non-violent' extremism to various extents. §4.4 shows that there seems to be a high threshold for reporting vulnerable individuals externally, which is reflected in the low numbers of individuals referred to Channel by universities. At the same time, the interviews uncovered divergence in the threshold for reporting vulnerable individuals. Participants A, B, C, D and I refused to report any concerns about non-violent extremism to external agencies, while Participants H and N admitted that they would share information about individuals who express extremist views without an immediate concern that they were going to commit a crime. Only Participants J, L, and P understood their obligations under Prevent as related to the identification and reporting of concerns about non-violent extremism and admitted that they would share information about vulnerabilities that render individuals at risk of radicalisation. In contrast, Participants E, F, G, K, M, O and Q did not clarify their threshold for information sharing, mainly because they have not found themselves in a situation that required them to make decisions about external referrals.

These findings suggest that McGovern and Durodie were wrong to conceive of universities as a homogenous entity. Universities are not equally affected by the conflation of safeguarding and security. Several cases provide compelling evidence for the claim that universities were able to resist this conflation by confining their Prevent interventions to concerns about violence as opposed to the mere display of non-violent extremist views and behaviours. McGlynn and McDaid deduced from their policy analysis that universities 'have uncritically adapted the concepts of vulnerability and radicalisation' (p. 109), and while this is the case for some universities, §4.3.3 shows that universities have different understandings of how to define radicalisation and extremism, and that several institutions actively rejected a state-centric adaptation of the concepts of vulnerability and radicalisation. The views of the participants outlined in §4.4.1 further demonstrate that some universities even actively rejected the official understanding of vulnerability and radicalisation.

7.2.2. Prevent and freedom of speech

While McGovern and O'Donnell predicted that universities would restrict free speech under Prevent, my document analysis of universities' approaches to implementing Prevent in the external speaker area suggests that universities have different understandings about whether

Prevent presents a limitation to freedom of speech. In practice, all but one participant emphasised their effort to allow the expression of legal (e.g. non-violent) extremist views during external speaker events, which contradicts the predictions outlined in §1.2.4 of the literature review. Several participants (in particular those associated with University A, B, E, G, I and M) emphasised that they did not change their approach to external speakers at all. They circumnavigated the ambiguity associated with the Prevent duty guidance by ignoring the definition of non-violent extremism altogether. Another set of universities amended their external speaker procedures by introducing novel approaches to vetting external speakers and by developing more robust free speech principles. While some participants highlighted the potential risk associated with the expression of non-violent extremist views, they did not seek to censor such expressions. Instead, they pointed to the important role of risk mitigations, especially those that seek to ensure balanced debate, in order to comply with Prevent while upholding free speech on campus. While scholars have highlighted the tension between Prevent and freedom of speech, my participants were able to balance their duties– either by ignoring the concept of non-violent extremism, or by relying on risk mitigations. Although some participants even suggested that their Prevent duty has improved their freedom of speech practices on campus, others highlighted the complicated nature of mitigating activities, which are perceived not only as enablers but also as potential barriers to freedom of speech. One participant grossly misunderstood their obligations under Prevent (see §5.2.5), which provided further evidence for the claim that Prevent's focus on non-violent activities renders the duty prone to misinterpretations and overzealous implementation.

7.2.3. Censorship and online surveillance under Prevent

My analysis of universities enactment of Prevent in the IT area uncovered that most universities' documents do not adequately reflect their on-the-ground enactment. Only after conducting the interviews was I able to identify the divergent approaches to blocking and monitoring legal and illegal extremist material under Prevent (see Appendix A).

In light of the fact that only three universities refused to alter their IT procedures at all under Prevent, I found that universities' approaches to monitoring extremist material under Prevent provides the most lucid example where universities have moved out of the sphere of traditional IT policies, either by introducing novel approaches to pro-active online surveillance, or by using their existing mechanism to access individuals' online activities in retrospective in order to gather intelligence on people they perceive as vulnerable to radicalisation. In this way, the study provides the empirical evidence to sustain Whiting et al.'s (2020) argument that (at least some) universities' policy enactments 'expand the mechanisms of surveillance' (p. 18) and

directly challenges McGlynn and McDaid's (2019) claim that 'concerns about surveillance and overt censorship cannot be sustained' (p. 109).

7.3. The securitisation of universities under Prevent

The empirical evidence of universities' various approaches to enacting Prevent as part of their safeguarding, external speakers and IT policies and procedures has allowed for a nuanced analysis of the extent to which universities have become 'securitised' as a result of Prevent. As highlighted above, universities' approaches to Prevent are highly divergent, which suggests that they have become securitised to very different extents. Some cases provide compelling evidence for the conclusion that universities have been drawn into the security apparatus of the state, not only by virtue of accepting and perpetuating the dominant securitisation discourse, but also through their enactment of policies that go well beyond their 'normal' safeguarding framework by engaging in proactive online surveillance and censorship, and by carrying out increased intelligence exchange with law enforcement agencies. The most comprehensive example for this is University L, which has introduced far-reaching online censorship and surveillance under Prevent, and who has a comparatively low threshold for reporting individuals externally. In contrast, University A has fully rejected the securitising move by challenging the perception of students as potential threats and by limiting their Prevent delivery to previously existing safeguarding and wellbeing structures. However, both of these cases are extreme, and the majority of my participants' accounts suggest that their institutions lie somewhere in between, having accepted certain narratives and practices, and rejected others. For example, Participant H accepts the narrative that their students are vulnerable to radicalisation and would consider referring individuals to Channel without evidence that they intend to engage in violent activities; in such cases, the University also collects intelligence by accessing students' online activities. At the same time, University H decided against introducing filters to block extremist material and highlighted the importance of fostering critical debate, which includes the expression of legal extremist views. My study thus argues that securitisation is a nuanced and complex process that does not only differ across institutions, but also within policy areas. Most universities resit the securitisation of legal speech by insisting on a liberal approach to external speakers, but at the same time introduce new approaches to (at least reactively) surveilling their students' online activities. Any generalised claims about the 'securitisation of education' thus does not hold up to rigorous empirical enquiry.

7.3.1. Universities' risk profiles

The study also finds that securitisation is a highly contextual process and that not all universities have similar means for refraining from engaging in securitised activities. While the OfS' evaluation of universities' implementation of Prevent highlighted that universities' policy enactment varies in accordance with their individual context, it did not provide any clarification on the contextual and local factors that are expected to shape universities' risk assessment (see §1.2.5.1.5). To address this knowledge gap, §§3.2 and 4.2 provide empirical evidence for the factors that shape universities' risk profile. I found that universities have very different risk profiles, and that some universities are perceived by the OfS and by their university governance as at high risk of radicalisation and of compliance failure, while others are at low, or even very low, risk of radicalisation. The interviews with the RCs and Prevent Committee members uncovered that various interconnected factors associated with universities' student demography, location, prestige, size, and governance shape their risk profiles and the pressure to comply that they face (§3.2.1; §4.2.2.2; §5.2.1). In turn, their risk profiles either widen or limit their scope for autonomy and thus for resisting securitisation.

This became particularly apparent in the cases of Universities A and B whose participants explained that they were able to test their threshold for compliance– especially in the external speaker area – because their privileged student demography renders the universities as at low risk of radicalisation, and their prestige protects them from sanctions associated with non-compliance that would pose existential issues for other universities. While §4.2.2 shows that members of universities with a low risk perception were also the most critical and rejecting of Prevent, the case of University L also demonstrates that policy enactment is not merely shaped by institutional factors, but by the attitude of the individuals in charge. Participant L's perceived failure to prevent a student from being drawn into terrorism at their previous high-risk university has shaped their wider commitment to safeguarding vulnerable individuals from radicalisation. In turn, this personal attitude has played an important factor in their development of comprehensive online surveillance mechanisms at the low risk University L (§6.2.1).

7.3.2. Interpretation of the findings

I am aware that my findings are open to a range of interpretations. For those who are supportive of the Prevent duty, the findings may provide evidence that the main goals of Prevent (to safeguard vulnerable individuals, and to tackle all forms of extremism) are widely accepted by those who deliver Prevent on the ground in universities. There are fairly high levels of acceptance of the duty as a genuine safeguarding approach among my participants; their statements also revealed that through careful enactment, it is possible to balance Prevent with freedom of speech and to provide genuine support services to vulnerable individuals. From this perspective, those

in support of Prevent will be satisfied to see evidence for the conclusion that compliance with Prevent does not necessarily determine university members to assume a role as agents of securitisation.

In contrast, critics of Prevent will find that their concerns are largely confirmed by my findings. There is evidence to suggest that monitoring procedures and risk assessment remain (at least implicitly) focused on Muslim students (see §§3.2.1 and 4.2.2), and that the duty has led universities to assume active roles as agents of securitisation by censoring and monitoring extremist yet legal online material, and by encouraging university administration to share intelligence about their students' vulnerabilities with law enforcement agencies. From this perspective, critics will find that certain approaches to implementing Prevent have exacerbated the securitisation of vulnerabilities and legal expressions, and that this securitisation has now become an accepted part of some universities' everyday life.

There is truth in both interpretations. Most importantly, my research has found that it is not only Prevent itself that inevitably leads to securitising activities. Rather, it is universities' interpretations of their legal and moral obligations, and their specific policy- and -on-the-ground enactment, that leads to securitising activities or to the rejection of the securitisation of vulnerabilities and legal expressions. The study provides evidence for the conclusion that universities have the capacity to resist securitisation, and that Prevent can be implemented in a way that averts the possible negative impact that is associated with the duty. Interestingly, contrary to the OfS' findings of near-universal compliance, universities do not universally see themselves as fully compliant with Prevent, and some interpret their 'light-touch' approach to Prevent as an active sign of resistance. But not all universities are equally well equipped to implement Prevent in those ways. The study found that 'resistance-centred' compliance (as opposed to state-centred compliance) is only possible under specific conditions: universities have to be at 'low risk' of radicalisation, which requires them to be located in an area with little extremist activity, and to host a low-risk student body. As drawn out in §§3.2.1 and 4.2.2, risks are associated with socio-economically disadvantaged and 'diverse' students (e.g. Muslim students, especially those with ties to local communities and those who are not expressively liberal). Those factors converge with universities' reputation, as the research-intense, prestigious pre-1992 universities (e.g. cluster 1 and 2 institutions) are well known to host the least diverse and most advantaged students in the country (Boliver, 2015). In this way, I would argue that the securitisation of universities has succeeded, since those who are perceived as at the highest risk of radicalisation also have the least resources to resist the securitising measures proposed by the RCs and the Prevent duty guidance.

7.3.3. Implications of the findings for securitisation theory and implementation research

In chapter 2, I argued that one major limitation posed by contemporary scholarship on securitisation is that empirical and theoretical accounts fail to address the gap between the passing of laws and regulations that introduce measures to address an existential threat, and the actual enactment of such measures on the ground. My focus on 'street-level bureaucrats' as the enabling audience allowed me generate a novel approach for evaluating the success of securitisation. Accordingly, this study provides empirical evidence for the claim that the success of the securitising move is not defined at the stage where extraordinary measures are successfully enshrined in legislations and regulations. Rather, the success of the securitising move depends on the institutionally specific, on-the-ground enactment of laws and policies. Localised engagement strongly shapes the specific manifestations of security. Specifically, individuals associated with several universities prevented the securitisation of various policy areas. My findings show that the enactment of Prevent was not merely informed by governmental legislations and guidelines, but rather by my participants' individual, contingent understanding of their legal responsibilities, as well as by their personal and institutional norms and values.

The enactment of Prevent at various institutions confirms that securitisation is 'guided by normative, rather than legal, ordering' (Hertogh 2010, p. 17). However, my analysis also revealed that the enactment of Prevent across other institutions and policy areas was shaped by 'top down' hierarchical forces, where decisions were primarily informed by efforts to comply with the law through careful adherence to governmental guidelines and regulations as they were perceived. Consequently, the study shows that securitisation cannot be understood exclusively in terms of bottom-up or top-down processes.

The study also revealed that the extent to which top-down characteristics shape the enactment of legislation is not exclusively dependent on the norms and values of individual street-level bureaucrats, but also informed by their wider institutional cultures and norms. While some participants' decisions were shaped by their personal experiences and values, others highlighted that their decisions were made in consideration of their colleagues' and students' value systems and their institutional cultures. This became particularly evident in the context of universities' approaches to online surveillance under Prevent. While P.L.'s decision to implement a comprehensive monitoring system was strongly informed by their past experience, P.A and P.C's decision to refrain fully from comparable measures was made primarily in consideration of their colleagues' and students' attitudes, and their institutions' liberal ethos. Such findings are important for policy implementation research, because they highlight that

street-level bureaucrats' decisions are not exclusively shaped by their personal moral compass, but also by their institutional milieu.

In conclusion, my study makes two major contributions to the study of securitisation and to policy implementation research:

1) The success of a securitising move cannot merely be defined by the passing of laws and regulations in response to a perceived threat. Rather, instances of successful securitisation require the enabling audience, namely the front-line workers charged with the on-the-ground implementation of securitising measures, to accept and to enact those laws and regulations.
2) While policy enactment may not be shaped solely by top-down rules and legislations, it is also not exclusively shaped by individuals' personal norms and value systems. Rather, street-level bureaucrats' decisions are informed by an interplay between their own values and their localised institutional cultures and characteristics.

7.4. Limitations and directions for future research

The study has been constrained by time, resources and word limitations. While I conducted an extensive analysis of the enactment of Prevent in the safeguarding, external speakers and IT areas, I was not able to provide a similarly comprehensive analysis of universities' approaches to training, student engagement, chaplaincy support, and research activities. While those areas were covered in both interviews and policy analysis, I was not able to present the findings as part of this thesis.

Moreover, I sought to deduce from the policy analysis and the interviews the extent to which universities existing approaches were altered in response to Prevent. The policy documents prior to 2015 are available in universities' archives, and a comparative analysis of pre-2015 and post-2015 safeguarding, IT, and external speaker policies would provide more transparency about the changes made in direct response to Prevent. That being said, the interviews provided significant clarity about the newly established measures in direct response to Prevent, and also showed that policies cannot be taken literally, as most documents do not accurately reflect universities' on-the-ground approaches. In this way, the triangulation of policy documents with interview data helped to overcome the limitations generated by the absence of a comparison of pre- and post 2015 policy documents.

A rigorous account of the impact of Prevent on academic freedom and freedom of speech requires more empirical evidence on the nature of mitigating actions that were proposed for events involving extremist speakers. A follow-up research project would have to examine all event

proposals that were escalated to the highest level at each university since 2015, and to interview the individuals in decision-making positions about the nature of the proposed mitigated actions and about the reasons for their choices. In addition, one would have to contact the event organisers and the event chairs and the external speakers in order to investigate whether the proposed mitigations were feasible, whether the event went ahead and to learn more about whether participants felt that they were able to express their views freely. A comparative analysis of the decision-making around external speaker events pre-2015 and post-2015 would additionally shed light into the extent to which universities' approaches to extremist speakers have changed in direct response to Prevent.

More broadly, a trans-national comparison of universities' approaches to dealing with controversial and politically polarised debates would yield important contextual insight into the current state of academic freedom in Britain. In contrast to the UK's prescriptive approach to countering extremism in educational institutions, other countries are offered non-binding and voluntary guidelines by the Radicalisation Awareness Network (RAN) established by the European Commission. RAN's (2019) 'Preventing radicalisation to Terrorism and Violent Extremism' document contains information about the prevention of violent extremism in the education area, which focus on 'promoting inclusive education and EU' (RAN 2019, p. 14), especially with regard to 'citizenship, political, religious and ethnic tolerance, non-prejudiced thinking, extremism, democratic values, cultural diversity and the historical consequences of ethnically and politically motivated violence' (p. 16). Streitwieser et al. (2019) note that RAN 'recommends that HEIs and other educational programmes develop a clear vision of how to address radicalization, with adequate training and support systems in place for educators' (p. 93). However, in their analysis of universities' approaches to countering violent extremism in Greece, Turkey, Germany and France 'there were virtually no responses to, nor acknowledgments of, the RAN policy', which 'stands in stark contrast to' UK universities' acknowledgement of Prevent (p. 93). It would be particularly interesting to explore how universities that are not legally obliged to implement counter-radicalisation practices navigate events involving extremist speakers, and how their approach reflects their wider commitment to freedom of speech. A cross-national investigation of universities' approaches to identifying external speakers as extremist in the absence of the vulnerability and radicalisation discourse observed in the UK, and their ways of dealing with such speaker events, would constitute a particularly valuable contribution to the current state of freedom of speech.

In addition, research examining universities' enactment of Prevent during the coronavirus pandemic would yield important insights into more recent developments, especially with regard to universities' approaches to monitoring and blocking access to extremist online

material. The OfS (2020) recognises that 'providers' modes of delivery and Prevent risk profile will have been affected by this period of disruption' (p. 1) and encourage universities to reflect on the way in which the pandemic has impacted the risk that their students may become radicalised. The OfS maintains that universities risk assessments 'should be viewed regularly to ensure that they appropriately reflect changes over time' which is 'particularly important in response to the coronavirus pandemic' because 'wider Prevent-related risks have… shifted' and universities had to move 'to a more blended approach of online and physical delivery' (p. 2). In turn, the OfS points to the 'potential implications of the risk associated with increased extremist activity online and the likely increased staff and student screen time as a result of [the move to] remote working', which 'may lead to possible increased opportunities for people to be influenced by terrorist content and messaging' (p. 2). Because of this perceived increased danger posed by online radicalisation, the OfS asks university governance 'to raise your institution's awareness and understanding of the risk and threat of people being drawn into terrorism online' (p. 2). The OfS reiterates that they expect that 'providers' IT policies must contain specific reference to the Prevent duty and they should have considered using web monitoring and/or filtering to restrict access to harmful content as part of their overall strategy'; it also highlights that welfare concerns about students who are now studying remotely should primarily be evaluated in consideration of 'whether they [the concerns] arise from activities… the student is undertaking' while 'connected to your institution's IT systems' (p. 3). It may well be possible that universities who initially decided against monitoring and blocking access to extremist material online have now turned to the proposed measures in response to the heightened risk awareness of online radicalisation and to compensate for the fact that they are less likely to identify welfare concerns otherwise. How the coronavirus pandemic has impacted on universities' risk profile and, in turn, on their enactment of Prevent remains to be explored.

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APPENDICES

APPENDIX A: RESEARCH DESIGN

Table 2.3.1. Example of the participant/case selection and recruitment process

University Name	Status cluster	Location	Contact details	Initial observation/comments	Recruitment round
xxx	2	Urban, London	Prevent lead, IT specialist, chaplain	Very transparent, critical statements about Prevent	1
xxx	2	Urban, London	Prevent lead, academic, IT specialist	Critical statements about Prevent, student union vocally rejecting, which is important because that might inform university governance's engagement with Prevent.	Very similar characteristics to university above, therefore recruitment round 2
xxx	2	Urban, East Midlands	Prevent lead, IT specialist	Positive statement about Prevent, involvement with Prevent before it became the law	1
xxx	2	Urban, North West	Prevent lead	Nothing in particular	2
xxx	4	Urban, London	Prevent lead	Very diverse university, also in a Prevent Priority Area, this is important because it might have an impact on their risk perception.	1
xxx	2	South West	Prevent lead/ student officer	Really interesting IT policy	1

Table 2.4.1. Document analysis

Focus area	Documentation
Attitude	Policy statements on public facing websites, videos, committee meeting minutes, letter exchanges with regulators
External partnerships and risk perceptions	Risk assessments and action plans, policy statements on public-facing websites, internal reviews, annual returns
Safeguarding and training	Policy statements, risk assessments and action plans, Prevent policy, safeguarding policy, safeguarding of children and young people and vulnerable adult policies, safeguarding procedures, safeguarding and duty of care policies, safeguarding vulnerable groups guidelines, reporting safeguarding concerns, safeguarding and referral guidelines, safeguarding against radicalisation procedures, Prevent student referral guidances, cause for concern framework
Freedom of speech and external speakers	Risk assessments and action plans, freedom of speech policy, code of practice for external speakers, external speaker risk assessments, external speakers and events policies, external speaker code of conduct, external speaker guidance, external speaker and room booking process, external speaker request forms, procedure for approving external speakers, visiting speaker and events policy, external speaker on campus policy, code of practice on freedom of speech, code of practice on freedom of speech and external speakers
Web filtering and monitoring	IT acceptable use policy, IT acceptable use regulations, information security policy, monitoring and interception policy, safeguarding policy, Prevent policy

Table 2.4.4. Coding of the interview data

Themes (in line with codes established during the document analysis)	**Risk assessment**	**Safeguarding**	**External speakers**	**Web filtering and monitoring**
Subthemes that emerged from the interview data	External risk factors	Attitude	Freedom of speech	Reasons for/against blocking
	Internal risk factors	Understanding of legal requirements	Understanding of legal requirements	Reasons for/against monitoring
	Attitude	Referrals	Legal and moral understanding: perspectives on liberties, vulnerabilities and threat	Perspectives on vulnerabilities and threat
	Partnership	Partnership	Decision making: speaker vetting and mitigating conditions	Personal and institutional values and culture
		Perspectives on vulnerabilities and threat	Personal and institutional values and culture	

Table 4.3.4. Overview of internal reporting mechanisms

Uni	Safeguarding/Prevent/Cause for Concern policy documentation
A	The internal review states that 'local staff such as welfare officers (…) will encourage students to seek help from the welfare service', and 'encourages staff to seek help from the human resource office' where 'there may be concerns raised that a student or a member of staff may be at risk of being drawn into terrorism'. This approach 'integrates concerns about the development of extremist attitudes into the broader approach to the welfare and well-being of students and staff'.
B	The safeguarding policy states that 'any behaviour which suggests that an individual might be at risk of being drawn into terrorism must be reported in the Prevent duty flowchart'. The policy further states that 'as with other types of safeguarding, the threshold for reporting to our designated officer for consideration through our documented process is low' because 'Prevent is concerned with early intervention to safeguard and divert people away from the risk they face'
C	C's website directs concerned individuals to their 'safeguarding against radicalisation flowchart'. The public-facing website directly addresses their audience by urging them not to ignore their concerns about individuals, especially if they have 'noticed a change in behaviour', for example because a person is becoming withdrawn or acts differently, or said something worrisome. 'staff in front-line support roles will often be the first to notice if a student experiences difficulties; or colleagues if the person is a member of staff', and C advises them to 'check with others that may have noticed something' or to 'speak to the person directly' to 'see if they share your concern'.
D	D's website advises people who 'have concerns that a student or colleague is vulnerable and at risk of being drawn into terrorism' to 'contact the University's Prevent Lead'. They also add that 'this can be on an anonymous basis'.
E	'a safeguarding approach should be adopted' concerns about vulnerable students are shared with senior members of the university welfare and safeguarding or HR team

	Members 'should not make referrals for Channel intervention to other authorities' themselves. In the first instance, staff and students who are 'concerned that a peer or colleague is being radicalised' are encouraged to 'discuss these concerns with the individual directly if possible'.
F	See E
G	G's website declares that in the 'event that an individual was considered to be at risk', one of their Designated Safeguarding Officers 'would be the first point of contact'
H	Concerns about vulnerable students and staff members are to be shared with senior members of the student welfare and HR departments
I	'that a student may be at risk of radicalisation' should 'be treated in the same manner as any other welfare case' 'the requirements of the Prevent duty are on the institution, not the individual', and that they 'are not expecting' staff members or students 'to make decisions about individuals without support'
J	J does not provide nuanced information about their internal safeguarding structures. The risk assessment reveals that 'the procedure for sharing information internally is for staff to contact the Prevent Lead', who is also part of the University's safeguarding team.
K	K relies on their 'Health, Welfare and Support for Study Process' to process Prevent referrals. They have appointed the 'head of student services' as a single point of contact for student-related concerns, and the Director of Human Resources as the contact person for staff-related concerns.
L	L's 'Staff Prevent Policy' states that 'an important element of complying with the Prevent Duty' is that 'staff know what to do and where to seek advice' in case 'they have a concern that someone in the university community is potentially being drawn into violent extremism or terrorism, or is vulnerable and susceptible to radicalisation'. The policy notes that 'where the concern is not in relation to an immediate risk, and relates to a student', the 'Living Support Team' should be contacted. The document also provides a flowchart 'for reporting and managing concerns about staff members relating to Prevent', with concerns being 'reported to the Director of HR'.
M	'Safeguarding concerns …should be submitted either via the online reporting link…or to the relevant Local Safeguarding Officer
N	N's website provides the contact details of designated safeguarding points of contact who deal with student concerns of all nature and states that 'if appropriate, concerns may be brought to the attention of the institution lead on Prevent Duty compliance'
O	'it is widely acknowledged that radicalised individuals come from a wide range of backgrounds and are often described as demographically unremarkable' 'caution needs to be emphasised when considering a potential concern about radicalisation'

	O's 'relevant policy for reporting Prevent-concerns is the Safeguarding Policy', which the university 'reviewed and revised on several occasions' in response to Prevent, so as to 'extend it to cover radicalisation/extremism' and to make sure that 'concerns can be addressed through existing internal mechanisms' concerns about vulnerable students are shared with senior members of the university welfare and safeguarding or HR team Members 'should not make referrals for Channel intervention to other authorities' themselves. In the first instance, staff and students who are 'concerned that a peer or colleague is being radicalised' are encouraged to 'discuss these concerns with the individual directly if possible'.
P	P's website advises people 'to speak with one of our designated safeguarding officers' 'as with other safeguarding concerns, the mantra should be: Notice, Check and Share' P's website advises staff not to 'overlook comments or behaviours which give pause for thought, whether directly observed or reported to them by students' they suggest that staff should in the first instance aim to achieve a better overview of the situation, by 'using common sense, if necessary by talking to identified students, or if possible, corroborating online material or asking for documentary material' (Like C) The Director for Student Support is the designated safeguarding officer for student affairs and the Director of Human Resources as the designated safeguarding officer for staff: they should be contacted 'if anxieties about students or staff' are not 'allayed' on grounds of the initial assessment P reminds their staff and students that 'our statutory duty does not require us to act in any covert way and that it is entirely normal at any stage in this strand of safeguarding to be openly discussed with identified students/staff'
Q	'For any safeguarding concerns involving staff members, the appropriate people to report concerns to is either of the Senior HR Business Partners.' 'For any safeguarding concerns involving students, the appropriate person to report concerns to is the Head of Student Services'

Table 4.3.5. Overview of external reporting mechanisms

Uni	Prevent/Safeguarding policy documents
A	'if a counsellor concludes that a person has been or is being drawn into terrorism, in all cases the matter should be referred to the University Registrar to determine what further actions may be required, including the possibility of reporting the concerns to the relevant authorities'. Internal review concludes 'that there have been no concerns that have reached as far as involving the university welfare services let alone triggering reference to bodies outside the university'.
B	B seeks 'to help individuals so identified to avoid moving into terrorism-related criminality, if necessary by referring them to external sources of help'
C	C has information-sharing agreements in place to share concerns 'externally by contacting their Regional Coordinator and the police to discuss potential Channel referrals'
D	
E	concerned members of staff 'should speak to his/her line manager', who in turn 'should contact the Safeguarding Co-ordinator' if the concern relates to Prevent
F	See E
G	G's senior safeguarding officer 'will consult with the Prevent Officer' when internally raised concerns 'relate to possible radicalisation and/or extremism as defined by the Prevent duty' Prevent Officer will subsequently 'consider what action is necessary, including referral to external bodies' the Prevent Coordinator 'may consult informally with a Coordinator from Channel about the general circumstances of the case but without at that stage making a formal referral to the Channel process or divulging the identity of the individual who is at risk of being drawn into extremism' that 'any formal referral of a vulnerable individual who is at risk of being drawn into extremism would be made only if there was a judgement that University processes were inadequate'
H	'will collaborate with all statutory partners', which include 'the police and the local community', in order 'to identify individuals at risk of being drawn into extremist behaviour'. 'serious concerns' may 'be subject to an external referral to key Prevent partners'
I	N/A
J	N/A

K	K 'will assess the specific details of the concern highlighted', and 'if the concern is a Prevent issue, convene a University Prevent assessment panel' to conduct further evaluation. If 'the panel agrees that the concerns are in relation to the Prevent duty, the individual and concerns identified will be referred to the Prevent regional coordinator' that 'this can be done with anonymous details, so that the individual's name is not confirmed to any external partners unless and until the concern is confirmed as a Prevent case' 'if the RC confirms that the concerns raised are in relation to the Prevent duty', they will 'confirm whether consent should be sought from the individual for a referral via the Channel programme'
L	'in some instances it may be necessary and proportionate to share some personal information with partner agencies as part of the risk assessment and referral process' 'information sharing will be assessed on a case by case basis': K will take 'into consideration the necessity and proportionality of sharing the information', also considering 'whether it is possible to obtain consent for the information to be shared'
M	N/A
N	'if necessary, concerns may be escalated to a Channel Panel'
O	also work together with their 'Local Safeguarding Officer' to 'address the concern' if related to Prevent O established 'a Channel Referral Panel to consider cases where a referral to the Channel programme may be appropriate' 'two concerns were escalated' internally, 'but required no further action'
P	'subsequent actions will have to be discussed with the student/member of staff concerned' 'their consent is required for referrals to other agencies' 'it is envisaged that a student will be invited to openly discuss the identified matters with the designated safeguarding officer in a pastoral non-disciplinary matter' 'no individual can be referred to Channel without their agreement and no individual can be compelled to take part'
Q	'the Designated Safeguarding Officer will liaise with other partner agencies as appropriate in order to address the safeguarding concerns identified'

Table 6.1.2. Reference to Prevent in universities' IT policies

Uni	Explicit reference to Prevent in IT policies	Implications for the use of ITC
A	IT Services 'support the University in its work with HEFCE [now OfS] and other agencies to ensure that the University will respond proportionately to risk whilst at the same time ensuring that it meets its obligations under the Prevent duty'	'users are not permitted to use university IT or network facilities… with the intention of drawing people into terrorism' this is 'contrary to the University's statutory duty under Prevent'
B	'extremist material –under the Counter-Terrorism and Security Act 2015, LSE must have "due regard to the need to prevent people from being drawn into terrorism."' 'Under the Act, C must seek to ensure that its IT facilities are not used to draw people into terrorism'	N/A
C	The University is under a duty to prevent extremism in accordance with the CTSA 2015	'You must not engage in any activity which could incite or promote terrorist activity including, but not limited to, accessing websites or social media content that might be associated with extreme or terrorist organisations and which could attract criminal liability'
D	The University has an explicit duty under s26(1) of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.	Where the user plans to utilise material …that may encourage terrorism within the meaning of the Terrorism Act (2006) and/or…where the University may have a duty under the Counter-Terrorism and Security Act (2015)… approval from the Director of Compliance and Risk is required
E	'Relevant legislation includes… the Counter Terrorism and Security Act 2015 (Prevent)'	N/A
F	See E	
G	The University has a statutory duty under the Counter-Terrorism and Security Act 2015, termed "Prevent".	N/A

	The purpose of this duty is to aid the process of preventing people being drawn into terrorism	
H	There are many items of legislation that are particularly relevant to the use of IT, including: Counter Terrorism and Security Act 2015	you may not...create or transmit material which encourages terrorism or extremism ... or which may cause others to be drawn into terrorism
I	all computing use must comply with relevant legislation, in particular with the ... Counter-Terrorism and Security Act 2015	N/A
J	The Counter-Terrorism and Security Act 2015 places a duty on universities to have due regard to the need to prevent people from being drawn into terrorism	Accordingly, users must not access terrorist material whilst using University IT services as it is a criminal offence
K	The University has a statutory duty, under the Counter Terrorism and Security Act 2015, termed 'PREVENT'. The purpose of this duty is to aid the process of preventing people being drawn into terrorism	You must not create, download, store or transmit unlawful material, or material that is...extremist
L	The 'equipment/network cannot be used for...the creation, transmission or retrieval of any terrorist/extremist literature, data or other material in accordance with Prevent Duty Guidance within the Counter Terrorism Act 2015'	
M	Users of information and information systems must be aware of, and fulfil their responsibilities under, the Government's Prevent Strategy	
N	Users should be aware that the University takes its responsibility under the Counter-Terrorism and Security Act 2015 extremely seriously including those requirements related to Section 29 of the Act and referred to as the "Prevent Duty'.	Consequently, users must not deliberately create, display, produce, store, circulate or transmit material related to terrorism or extremist ideology in any form or medium
O	The Terrorism Act 2000 and the Terrorism Act 2006 create various offences relating to information, including: • Collecting information likely to be useful in the commission or preparation of an act of terrorism. • Publishing statements which encourage or glorify terrorism. • Disseminating terrorist	(Risk assessment) The University's ICT Acceptable Usage Policy prohibits the downloading or distribution of material which is illegal under the Terrorism Acts and extremist material ("material promoting extremist ideologies which place individuals at risk of being drawn into terrorism").

	publications. The offences are subject to certain exemptions intended to allow legitimate use: The Counter-Terrorism and Security Act 2015 places a duty on universities to have due regard to statutory guidance relating to the need to prevent individuals from being drawn into terrorism (the 'Prevent Guidance'). The Prevent Guidance requires universities to have appropriate IT policies in place; to consider the use of web filtering to restrict access to harmful material; and to have policies for access to sensitive or extremism related material for legitimate research purposes	
P	You must not access, create, store or transmit any content… that might be subject to the provisions of the Counter-Terrorism and Security Act 2015	
Q	The University has a statutory duty 'to have due regard to the need to prevent people from being drawn into terrorism'. The use of IT facilities to support terrorist activity is not permitted and may result in a criminal charge	Access to material promoting terrorism is not permitted, unless this access has been specifically allowed by the University Ethics Committee as part of an approved programme of research

Table 6.1.2. Blocking material under Prevent: policy vs. practice

University	**Universities which do not block extremist material**	**Universities which reserve the right to block extremist material**	**Universities which block access to extremist material**	**On the ground approach**
A	Not clear whether the university blocks extremist material			Does not block under Prevent
B	'a number of commonly-used website categories will be blocked by default', but none of them are Prevent related	–	–	Does not block under Prevent

C	Websites 'known for malware, phishing or other malicious content' are blocked, but does not reveal whether the university additionally blocks content related to extremist material			Does not block under Prevent
D	Not clear whether the university blocks extremist material			Does not block under Prevent
E	Not clear whether the university blocks extremist material			Does not block under Prevent
F	Not clear whether the university blocks extremist material			Does not block under Prevent
G	'only block sites which are harmful to information security'; 'blocking is not otherwise based on site content'; 'blocked sites include phishing sites'– does not point to any blocking mechanisms put in place in response to Prevent			Does not block under Prevent
H	–	'Reserves the right to block' access to 'unlawful material or material that is indecent, offensive, threatening, discriminatory or extremist, or which may cause others to be drawn into terrorism'	–	Does not block material under Prevent
I	Not clear whether the university blocks extremist material			Does not block under Prevent
J	–	–	**Policy:** 'the campus firewall provides protection to devices and services at the University from certain forms of attack from the outside world, by blocking or restricting access to them' **Action plan:** 'details of illegal terrorist and extremist websites will be provided to IT Services by the Further and Higher Education Prevent Officer', 'access to these sites will be blocked using the University's filtering software'	Blocks material under Prevent
K	–	Reserves the right to block' access to 'unlawful material or	–	Blocks clearly illegal content in compliance with Prevent

		material that is indecent, offensive, threatening, discriminatory or extremist, or which may cause others to be drawn into terrorism'; 'the interpretation will normally be responsibility of the Registrar and Secretary'		
L	Not clear whether the university blocks extremist material			Blocks access to terrorist material (but already prior to Prevent)
M	Not clear whether the university blocks extremist material			Blocks access to illegal terrorist/extremist material in direct response to Prevent
N	Not clear whether the university blocks extremist material			Does not block under Prevent
O	–	'the university reserves the right to implement filtering to block access to unlawful material'	**Action plan**: blocks a variety of extremist sites using web-filtering software provided by Palo Alto Networks; Relies on 'extremism' category that includes: 'websites promoting terrorism, racism, fascism or other extremist views discriminating people or groups of different ethnic backgrounds, religions or other beliefs'	Blocks material under Prevent
P	Not clear whether the university blocks extremist material; FOI request shows: 'Checkpoint URL filtering (blocking)', this encompasses 'lists from the Internet Watch Foundation', unclear whether access to Prevent-related material is blocked			Blocks 'political' material (for example 'Jihadi websites')
Q	Not clear whether the university blocks extremist material			Does not block under Prevent

Table 6.1.3. IT document analysis: Monitoring under Prevent

University	General approach to monitoring	Content subject to monitoring	Monitoring of individuals' use	Reasons for Exceptional monitoring	Monitoring on the grounds of suspected breaches of university regulations
A	'reserves the right to examine the content of users' data'	N/A	No routine monitoring of individuals' usage	N/A	N/A
B	'reserve the right to monitor'	'pages and other content accessed'	they 'do not by default perform analysis of individuals' use of services, devices, internet and emails'	CTSA 2015 is part of their list of 'laws and regulations affecting monitoring and logging', unclear whether that means the university monitors under Prevent ; in compliance with the Regulation of Investigatory Powers Act (RIPA 2000); 'for crime prevention and detection'	to 'prevent and detect' the 'unauthorised use' of IT facilities
C	'reserves the right to monitor and record'	'internet usage'	No routine monitoring of individuals' usage	in compliance with the Regulation of Investigatory Powers Act (RIPA 2000); 'for crime prevention and detection'; 'in the interest of national security'; 'lawful requests for information from government and law enforcement agencies'	N/A
D	'monitors access'	N/A	'no member of staff…is permitted, as a matter of routine, to monitor or investigate an	an 'explicit duty under s26(1) of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into	'reasonable grounds to suspect an instance of unacceptable use of any University IT facilities': IT staff members are granted

			individual's use of University IT facilities'	terrorism'; this 'may require the University to monitor and report'	permission for 'monitoring or investigation of an individual's use of IT facilities'; including 'the monitoring of email and use of the internet', including the 'use of social media websites'
E	N/A	N/A	'logs are not actively monitored down to an individual level'	'as required by law', includes 'any legal obligation'; in compliance with the Regulation of Investigatory Powers Act (RIPA 2000)	to 'prevent and detect' the 'unauthorised use' of IT facilities
F	N/A	N/A	logs are not actively monitored down to an individual level'	in compliance with the Regulation of Investigatory Powers Act (RIPA 2000)	N/A
G	'monitor and record'	N/A	do 'not routinely monitor individual users' use of IT facilities and services'	'compliance with UK legislation'	to identify 'infringements' of their regulations and to 'investigate alleged misconduct'
H	'monitor and record'	N/A	N/A	'lawful requests for information from government and law enforcement agencies'	to identify 'infringements' of their regulations and to 'investigate alleged misconduct'; **Action plan:** 'mitigating activities to manage the risk of people accessing extremist and radical material' include 'utilizing monitoring of activity where there is a clear case to do so in

					accordance with the University's policies'
I	N/A	N/A	N/A	For the purpose of 'detecting crime'	to 'prevent and detect' the 'unauthorised use' of IT facilities
J	'monitor and record'	N/A	Reserves the right to 'routinely monitor'	'lawful requests for information from government and law enforcement agencies'	N/A
K	'reserve the right to monitor'	'any system generated files', for example 'log files and error/exception reports'; keeps logs of 'the email system', which contain 'information about the flow of email, including source, destination and subject', but not the 'body content of email messages'; the logs contain 'information about internet activity, including sites visited', which can also be 'traced back to individual computers'	N/A	N/A	'where there is good reason to believe that there may have been a breach of University Regulations'
L	'access to inappropriate sites will be highlighted to users, and any	N/A	Routinely monitors under Prevent	'Prevent Monitoring Process; shares the information 'on request' with 'appropriate external agencies, including	Monitors under Prevent!

	onward access will be logged'			the Police and Security Services''	
M	'monitor and record'	N/A	'does not routinely monitor individual users' use of IT facilities and services'	'compliance with UK legislation'	N/A
N	'has the right to monitor'	N/A	may 'from time to time' monitor individuals' usage; 'users should have no expectation of privacy when using the University's IT facilities'.	'will cooperate with law enforcement authorities to prosecute offenders'	Monitors 'to ensure that all users comply with University policies, practices and procedures'
O	'reserve the right to monitor'	'email, telephone and any other electronically mediated communications': 'monitoring may involve' the process of examining 'the number and frequency of emails', 'viewing sent or received emails', 'examining logs of ICT facility usage', collecting information on 'the amount of time spent on the internet' as well as 'internet sites visited and	'randomly' monitors individuals' usage	in compliance with the Regulation of Investigatory Powers Act (RIPA 2000)	'reasons for monitoring include the need to... ensure compliance with this policy or other University policies' **Action plan:** IT acceptable use policy prohibits access to 'material promoting extremist ideologies which place individuals at risk of being drawn into terrorism; university monitors access attempts and relies on the 'web filtering software provided by Palo Alto Networks''

		information downloaded'.; include conducting 'a more detailed investigation' that involves 'further monitoring and examination of stored data', which is 'held on servers/disks/drives or other historical/archived data'.			'four categories are logged and reviewed for web access that may be of potential concern relating to Prevent'
P	'monitor and record'	N/A	N/A	N/A	N/A
Q	'monitors and logs'	authorises 'certain staff within the University' to 'examine files, emails, data within individual accounts and network traffic'	N/A	'will comply with lawful requests for information from law enforcement and government agencies for the purposes of detecting, investigating or preventing crime, and ensuring national security'	to detect, investigate or prevent 'the misuse of the facilities or breaches of the University's regulations'

Table 6.2. Data triangulation of IT policies and interview data: monitoring under Prevent

	Policy documents	Practice (Interview data)
A	No explicit indication that the university monitors under Prevent	No monitoring under Prevent
B	CTSA 2015 may affect monitoring	Reactively monitors under Prevent
C	No explicit indication that the university monitors under Prevent	No monitoring under Prevent
D	CTSA 2015 may require the university to monitor	Reactively monitors under Prevent

E	No explicit indication that the university monitors under Prevent	Unclear whether they reactively monitor under Prevent
F	No explicit indication that the university monitors under Prevent	Unclear whether they reactively monitor under Prevent
G	No explicit indication that the university monitors under Prevent	Did not reactively monitor under Prevent but acknowledges the possibility
H	Monitoring in certain circumstances under Prevent	Reactively monitors under Prevent
I	No explicit indication that the university monitors under Prevent	Did not reactively monitor under Prevent but acknowledges the possibility
J	No explicit indication that the university monitors under Prevent	Reactively monitors under Prevent
K	No explicit indication that the university monitors under Prevent	Pro-active monitoring under Prevent
L	Monitors under Prevent	Pro-active monitoring under Prevent
M	No explicit indication that the university monitors under Prevent	Reactively monitors under Prevent
N	No explicit indication that the university monitors under Prevent	Reactively monitors under Prevent in response to external requests
O	Monitors under Prevent	Pro-active monitoring under Prevent
P	No explicit indication that the university monitors under Prevent	Reactively monitors under Prevent
Q	No explicit indication that the university monitors under Prevent	Reactively monitors under Prevent

APPENDIX C: CUREC APPROVAL

To: Lynn.schneider@education.ox.ac.uk,
Cc: David Johnson, Education Research Office

Dear Lynn

This has been around the Division and checked – it appropriate under CUREC 1, apologies for any cross-posting, this note is to underline approval.

"Research Ethics"-session as part of the Foundations of Educational Research paper during my MSc in Comparative and International Education in 2016

The above application has been considered on behalf of the Departmental Research Ethics Committee (DREC) in accordance with the procedures laid down by the University for ethical approval of all research involving human participants.

I note the school is named in this application, please ensure strict anonymity.

I am pleased to inform you that, on the basis of the information provided to DREC, the proposed research has been judged as meeting appropriate ethical standards, and accordingly, approval has been granted.

Please note data should not be collected until approval granted.

If your research involves participants whose ability to give free and informed consent is in question (this includes those under 18 and vulnerable adults), then it is advisable to read the following NSPCC professional reporting requirements for cases of suspected abuse

http://www.nspcc.org.uk/globalassets/documents/information-service/factsheet-child-abuse-reporting-requirements-professionals.pdf

Should there be any subsequent changes to the project which raise ethical issues not covered in the original application you should submit details to research.office@education.ox.ac.uk for consideration.

Good luck with your research study.

Sincerely,

With kind regards,

Liam

Dr LF Gearon
Chair DREC
Department of Education
University of Oxford

APPENDIX D: PARTICIPANT INFORMATION SHEET FOR PREVENT COMMITTEE MEMBERS

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Counter-Terrorism and Security on Campus: An Investigation of the Implementation of Prevent in UK Higher Education Institutions

PARTICIPANT INFORMATION SHEET

Ethics Approval Reference: ED-C1A-17-61

1. **What is the purpose of this research?**

   This study hopes to answer the following questions:

   How do Higher Education Institutions translate the objectives of the Prevent Duty into policies and procedures?
   How and why do universities implement Prevent differently?
   What are the options that universities have and what are the factors that inform their decisions?

   The purpose of this research is to learn how universities understand their legal obligations and social responsibilities regarding their involvement in terrorism-prevention.

2. **Why have I been invited to take part?**

   You have been invited because you are/were involved in the process of implementing the Prevent Duty at your university.

3. **Do I have to take part?**

   No. You can ask questions about the research before deciding whether or not to participate. If you do agree to participate, you may withdraw yourself from the study at any time, without giving a reason, by advising the researchers of this decision.

4. **What will happen to me if I take part in the research?**

   If you are happy to take part in the research, you will be asked to have a conversation with me about the implementation of the Prevent duty at your institution. Before we start this conversation, I will tell you about my research interest and I will answer all your questions. I will specifically inform you about my intentions and about how I process the interview data. **The name of all universities and participants will be anonymised to avoid reputational harm. The published material will not identify the university or the research participants. In order to complicate the possibility of identification, I will also anonymise the data that universities openly publish on their webpages.** If you are happy to take part , you will then be asked to sign a consent form. During the interview, we will talk about some of the policies and procedures that the university has developed in order to comply with the Prevent Duty. We will also talk about how those policies were developed. The time, place and duration of the conversation will be determined by you.
   Follow-up conversations are not planned, however, if you want to share more insights later, I am more than happy to arrange this. If you are fine with this, I would like to audio-tape the conversation.

5. **Are there any potential risks in taking part?**

a) Will my participation threaten national security or prejudice the prevention of crime?

No risk.

Some information regarding the Prevent Duty are very private and confidential (for example the name of individuals who were identified as vulnerable and/or reported to law enforcement authorities). This is not the focus of this research. I aim to get an overview of the different approaches towards implementing Prevent and a lot of information on the topics that I am exploring were made publicly available by many universities already. I aim to get insight into the process of developing policies and procedures, and they commonly treated as non-confidential. However, if you don't want to answer some of my questions because youare worried that they are too security sensitive, that is of course perfectly fine. **I will also anonymise your identity as well as the identity of your university.**

b) Will my participation harm my reputation or the reputation of my university?

Low risk.

The objectives of the Prevent Duty are perceived as controversial by many, and in past, universities have been named and shamed for "resistance" as well as for "over-compliance". **I will prioritise the protection of my participants and their universities from reputational harm throughout the whole research project**. My goal is to provide a comparative analysis of how policies and procedures were changed or developed in order to comply with the objectives of Prevent and why universities choose different approaches to compliance. For example, I aim to understand why some universities don't use web filtering, monitoring and reporting solutions while others do. I will publish my findings and this will enable readers to approve of or critique universities' decisions in general, but **my research will not focus one single person or university.**

Many information regarding the implementation of the Prevent Duty are available on universities web pages. Universities employ different levels of transparency: some universities publish everything (from committee minutes to their annual return documents, including their risk assessments) on their webpages and most universities publish at least their policies and regulations. This means I am mainly working with data that anyone can access and assess. Your participation in this research project will help me to interpret those policies correctly and to understand how they were developed.

The purpose of this study is not to harm the reputation of single universities. For this reason, **I will anonymise even those information that are publicly available.** This will significantly reduce any potential risks.

6. **Are there any benefits in taking part?**

While there won't be any direct benefits to you from taking part in this research, your participation enables me to develop a research project that will hopefully be beneficial for higher education policy makers, academics and students. I hope that my research will provide useful information for higher education professionals and allow for more clarity regarding the implications of Prevent for the university sector.

7. **What happens to the data provided?**

The research data and records will be only retained for as long they are of continuing value for me, so audio recordings will be deleted once transcribed. The transcriptions will be anonymised so that only I will know the identity of individuals and institutions. The minimum retention period for research data is three years after publication. The research data will be encrypted and stored on an external hard drive. If required, I will show my supervisor my data. However, I will be the only one who has ongoing access to the external hard drive.

8. **Will the research be published?**

Yes. Parts of the research will be published in a book chapter of the forthcoming Handbook of Universities, Security and Intelligence Studies, where I focus on the objectives of the Prevent duty with regard to university IT policies and procedures. Furthermore, the research will be written up as a thesis. On successful submission of the thesis, it will be deposited both in print and online in the University archives, to facilitate its use in future research.

9. **Who is organising and funding the research?**

The research project is self-funded and solely organised by the researcher.

10. **Who has reviewed this study?**

This study has been reviewed by, and received ethics clearance through, the University of Oxford Central University Research Ethics Committee (Reference number: ED-C1A-17-61)

11. **Who do I contact if I have a concern about the study or I wish to complain?**

If you have a concern about any aspect of this study, please contact me 07496 022863 and I will do my best to answer your query. I will acknowledge your concern within 10 working days and give you an indication of how I intend to deal with it. If you remain unhappy or wish to make a formal complaint, please contact the relevant chair of the Research Ethics Committee at the University of Oxford who will seek to resolve the matter in a reasonably expeditious manner:

Chair, **Social Sciences & Humanities Inter-Divisional Research Ethics Committee**; Email: ethics@socsci.ox.ac.uk; Address: Research Services, University of Oxford, Wellington Square, Oxford OX1 2JD

12. **Data Protection**

The University of Oxford is the data controller with respect to your personal data, and as such will determine how your personal data is used in the study.

The University will process your personal data **for the purpose of the research outlined above**. Research is a task that we perform in the public interest.

Further information about your rights with respect to your personal data is available from http://www.admin.ox.ac.uk/councilsec/compliance/gdpr/individualrights/.

13. **Further Information and Contact Details**

If you would like to discuss the research with someone beforehand (or if you have questions afterwards), please contact:

Lynn Schneider
Department of Education
15 Norham Gardens
Oxford OX3 6PY
Tel: 07496 022863
Email: lynn.schneider@education.ox.ac.uk

APPENDIX E: PARTICIPANT INFORMATION SHEET FOR REGIONAL COORDINATORS

Lynn Schneider
DPhil Student
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Counter-Terrorism and Security on Campus: An Investigation of the Implementation of Prevent in UK Higher Education Institutions

PARTICIPANT INFORMATION SHEET
Ethics Approval Reference: ED-C1A-17-61

1. What is the purpose of this research?
This study hopes to answer the following questions:
How do Higher Education Institutions translate the objectives of the Prevent Duty into policies and procedures?
How and why do universities implement Prevent differently?
What are the options that universities have and what are the factors that inform their decisions?
The purpose of this research is to learn how universities understand their legal obligations and social responsibilities regarding their involvement in terrorism-prevention. Furthermore, this research aims to explore how and how the delivery of Prevent is monitored and what support universities receive.

2. Why have I been invited to take part?

You have been invited because you are charged with the task to support universities in delivering Prevent. This means that you have expert knowledge regarding the various ways in which universities respond to their duties under Prevent.

3. Do I have to take part?
No. You can ask questions about the research before deciding whether or not to participate. If you do agree to participate, you may withdraw yourself from the study at any time, without giving a reason, by advising the researchers of this decision.

4. What will happen to me if I take part in the research?
If you are happy to take part in the research, you will be asked to have a conversation with me about the implementation of the Prevent duty in your region. Before we start this conversation, I will tell you about my research interest and I will answer all your questions. I will specifically inform you about my intentions and about how I process the interview data. Your name and the name of all universities and will be anonymized to avoid reputational harm. If you are happy to take part , you will then be asked to sign a consent form. During the interview, we will talk about some of the policies and procedures that universities have developed in order to comply with the Prevent Duty. We will also talk about how those policies were developed and how universities carry out their Risk Assessments. The time, place and duration of the conversation will be determined by you. Follow-up conversations are not planned, however, if you want to share more insights later, I am more than happy to arrange this. If you are fine with this, I would like to audio-tape the conversation.

5. Are there any potential risks in taking part?

a) Will my participation threaten national security or prejudice the prevention of crime?

No risk.

Some information regarding the Prevent Duty are very private and confidential (for example the name of individuals who were identified as vulnerable and/or reported to law enforcement authorities). This is not the focus of this research. I aim to get a sector wide overview of the different approaches towards implementing Prevent and a lot of information on the topics that I am exploring were made publicly available by many universities already. I aim to get insight into the process of developing policies and procedures, and they commonly treated as non-confidential. However, if you don't want to answer some of my questions because you are worried that they are too security sensitive, that is of course perfectly fine.

b) Will my participation harm my reputation or the reputation of any university?

Low risk.

The objectives of the Prevent Duty are perceived as controversial by many, and in past, universities have been named and shamed for "resistance" as well as for "over-compliance". I will prioritise the protection of my participants and their universities from reputational harm throughout the whole research project. My goal is to provide a comparative analysis of how policies and procedures were changed or developed in order to comply with the objectives of Prevent and why universities choose different approaches to compliance. I will publish my findings and this will enable readers to approve of or critique universities' decisions in general, but my research will not focus one specific person or university in particular. Many information regarding the implementation of the Prevent Duty are available on universities web pages. Universities employ different levels of transparency: some universities publish everything (from committee minutes to their annual return documents, including their risk assessments) on their webpages and most universities publish at least their policies and regulations. This means I am mainly working with data that anyone can access and assess. Your participation in this research project will help me to interpret those policies correctly and to understand how they were developed. The purpose of this study is not to harm the reputation of single universities. I will NOT link your insights to one explicit university. This will significantly reduce any potential risks.

6. Are there any benefits in taking part?

While there won't be any direct benefits to you from taking part in this research, your participation enables me to develop a research project that will hopefully be beneficial for higher education policy makers, academics and students. I hope that my research will provide useful information for higher education professionals and allow for more clarity regarding the implications of Prevent for the university sector.

7. What happens to the data provided?

The research data and records will be only retained for as long they are of continuing value for me, so audio recordings will be deleted once transcribed. The transcriptions will be anonymised so that only I will know the identity of individuals and institutions. The minimum retention period for research data is three years after publication. The research data will be encrypted and stored on an external hard drive. If required, I will show my supervisor my data. However, I will be the only one who has ongoing access to the external hard drive.

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Yes, the research will be written up as a thesis. On successful submission of the thesis, it will be deposited both in print and online in the University archives, to facilitate its use in future research.

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Chair, Social Sciences & Humanities Inter-Divisional Research Ethics Committee; Email: ethics@socsci.ox.ac.uk; Address: Research Services, University of Oxford, Wellington Square, Oxford OX1 2JD

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The University of Oxford is the data controller with respect to your personal data, and as such will determine how your personal data is used in the study.
The University will process your personal data for the purpose of the research outlined above. Research is a task that we perform in the public interest.
Further information about your rights with respect to your personal data is available from http://www.admin.ox.ac.uk/councilsec/compliance/gdpr/individualrights/.

13. Further Information and Contact Details
If you would like to discuss the research with someone beforehand (or if you have questions afterwards), please
contact:
Lynn Schneider
Department of Education
15 Norham Gardens
Oxford OX3 6PY
Tel: 07496 022863
Email: lynn.schneider@education.ox.ac.uk

APPENDIX F: CONSENT FORM

Lynn Schneider
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Department of Education
15 Norham Gardens
Oxford, OX2 6PY
07496 022863
lynn.schneider@education.ox.ac.uk

PARTICIPANT CONSENT FORM

CUREC Approval Reference: ED-C1A-17-61

Counter-Terrorism and Security on Campus: An Investigation of the Implementation of Prevent in UK Higher Education Institutions

Purpose of study: This research project explores how higher education institutions translate the objectives of the Prevent duty into policies and practices. Following a document review that investigates how policies and practices are amended in order to comply with the legal requirements of the Prevent duty, I am conducting interviews with experts in the implementation process. The purpose of those conversations is to get a better understanding of the options higher education institutions have and the reasons that inform decision-making. Ultimately, I aim to explore how universities understand their legal obligations and social responsibilities.

Please initial each box

1	I confirm that I have read and understand the information sheet for the above study. I have had the opportunity to consider the information, ask questions and have had these answered satisfactorily.
2	I understand that my participation is voluntary and that I am free to withdraw at any time, without giving any reason, and without any adverse consequences or academic penalty.
3	I understand that research data collected during the study may be looked at by designated individuals from the University of Oxford where it is relevant to my taking part in this study. I give permission for these individuals to access my data.
4	I understand that this project has been reviewed by, and received ethics clearance through, the University of Oxford Central University Research Ethics Committee.
5	I understand who will have access to personal data provided, how the data will be stored and what will happen to the data at the end of the project.
6	I understand how this research will be written up and published.
7	I understand how to raise a concern or make a complaint.
8	I consent to being audio recorded
9	I understand how audio recordings will be used in research outputs
10	I give permission to be quoted directly in the research publication
11	I understand that my name and the name of the university will be anonymised

12	I agree to take part in the study	☐

_____	_____	_____
Name of Participant	Date	Signature
_____	_____	_____
Name of person taking consent	Date	Signature

APPENDIX G: TOPIC GUIDE

Example for University C

Your role

The Prevent steering group: Involvement of academics and of the student union?

Pre-involvement with Prevent?

Attitude

Understanding of the major requirements to ensure compliance

Main reasons for compliance

'Whilst there is low risk of extremist activity at the University, our duty of care to students and staff is of the utmost importance'.
-factors that shape low risk (see later if not discussed here)

Statutory guidance- useful? Rejection of any aspects?

Consideration of bare legal minimum?

Biggest challenges/opportunities associated with the implementation

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Partnership and Risk assessment

Website refers has a link to the Police- Local information regarding counter terrorism in the area. Why?

How does the university identify, understand and minimise the risk of its members being radicalised or drawn into terrorism?

What are the main risks? How did you identify them? How are they minimised?

CTLP: high or low risk?
Internal risk: high or low?
OfS risk evaluation: high or low (did that ever change?)

Relationship between risk estimation and compliance

Information sharing with police liaison officer and RC as a result of Prevent

Engagement with police on countering violent extremism before Prevent?

Involvement in CTLP drafting?

Relationship between University and Regional Coordinator?

Relationship between University and Police Liaison Officer?

Nature of information shared/consultancy sought beyond formal referral?

Relationship between University and HEFCE/OfS?

Major policy changes as a result of Prevent? Compared to before Prevent?

External speaker policy

-how does the university create a balance between the possibility of extremism and unlawful conduct will arise on campus and its obligation to secure free speech?

-would the university allow an external speaker affiliated with CAGE to participate in event?

-did the university ever deny an external speaker because of Prevent? How? Why?

-did the university ever mitigate an external speaker event because of Prevent? How? Why?

-how did the approach to external speakers and events in the last 5 years? Is the university now more or less cautious than in the beginning?

-how does the university conduct background checks on speakers?

-does the university seek consultancy from the RC/ police liaison officer? Do you have data sharing agreements (formal/informal) with external partners?

-ANNUAL REPORT: does the university provide information about any non-Prevent related events and speaker incidents? Do they clearly indicate which information relate to Prevent matters and which don't?

Welfare:

What does the university do as part of your welfare in relation to Prevent?
What has changed in the welfare area as a result of Prevent?

Your website has a link to the Safeguarding against radicalisation: What to do in the event of a concern flowchart- the link has expired/is not available anymore- can you send it to me?

Can you explain me more about your referral procedures?

-what constitutes a serious concern that may be subject to external referral to key Prevent partners?

-does the university seek informal consultancy from police liaison officer or RC before you formally refer an individual at risk? (Concerns will only be shared externally where there is a clear and compelling requirement to do so)

-referral: how are the individuals of concern included in the process? When do you seek consent?

Prevent is embedded within the Safeguarding structure. What does that mean?
How go welfare and Prevent hand in hand? Was that challenged by anyone in the committee?

What are the positive welfare contributions that the university makes to foster community cohesion and prevent non-violent and violent extremism? (How) did that change as a result of the duty?

Training:

You have a "Safeguarding from Radicalisation" e-learning programme available to all staff- is this compulsory?
-can I have access to this?
Does the university use WRAP?

You also have workshops to discuss any issues regarding Prevent in more depth: who took part in this? What issues were raised?

How does the university train individuals to spot extremism

The university's safeguarding policy refers to the governments' definition of extremism

Extremism - Vocal or active opposition to aspects of living in the UK including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs

How does one prevent vocal opposition to fundamental British values?

Do universities have to stop people from becoming radicalised or stop people from committing terrorist related offences? Or both?

How does one identify vulnerable adults? Is every student potentially vulnerable? Who is and who is not?

What is the duty of care? Is this a legal concept? How does it relate to Prevent?

Web filtering and monitoring

"The university reserves the right to block or monitor access to such material"

Monitoring and Interception Policy
-not accessible to me.
-what does it say about monitoring under Prevent?
- can you send me the policy?

Is there a relationship between online material that is blocked and external speakers that are denied/mitigated? More liberal approach to speakers or online material?

Security sensitive research policy

How is the code of practice for the notification of misconduct to the Police and Internal action related to Prevent?

Transparency and student engagement

How was the University's approach communicated with students?

Some universities have published their risk assessments and annual returns. Were there any discussions about this at the university?

Would you be able to share the risk assessment and annual returns with me?

Annual returns:

All welfare concerns not only those directly related to Prevent
Are you able to indicate which ones are related to Prevent and which ones are not?
How much information can you provide in the data return?

APPENDIX E: TOPIC GUIDE REGIONAL COORDINATOR

Example RC3

Role and involvement

Information sharing with universities: The counter-terrorism local profiles

Are universities invited to take part in the drafting of the CTLP? If so, what sort of information can they provide that are useful?

How are universities in your area involved in this? Can you tell me more about the information sharing practices?

How does the local risk inform the internal risk assessment? How do you provide guidance? How does the OfS decide which universities are high and low risks? Do they focus more on the internal context or on the local context? Or on both? How do they get their information? Do you consult those in charge of monitoring compliance with Prevent at the OfS?

What are the main risks in the area?

What are possible risk factors that universities ought to evaluate in their own context?

Are you advising universities differently and according to their risk assessment or are you advocating a sort of standard approach to prevent?

Are any of your universities at 'high risk'? and if so, why?

Would you recommend universities to employ web filtering and monitoring?

What are the different recommendations that you would give to different universities?

What do you think are the major differences across the universities?

What are the differences in universities attitudes and what do you think are the factors that shape universities attitudes?

What were the characteristics of those most critical?

What were the characteristics of those who were most welcoming?

How many universities engaged with Prevent before it was legally obliged to do so?

Do universities engage with you in similar ways? Do you have closer relationships with some universities than you have with others? If so, why?

Is there an equal threshold for compliance with Prevent across all universities or do some universities have to do more in order to be considered compliant with Prevent? How does the monitoring differ amongst different risk categories?

Why do some universities reject web-filtering and monitoring while others don't? How many universities under your "watch" are using filters to block extremist material? How many universities are monitoring their student's online activity? How many universities decided against both?

Were there any universities who rejected the welfare approach to prevent and took a different interpretation?

Did universities misunderstand their obligations under Prevent?

If yes: What were common misunderstandings?

Was or is overcompliance an issue in the area?

How do you consult universities on their free speech and external speaker policies? Technically universities ought to allow all speech that is legal. Prevent wants universities to control and mitigate speech that might constitute a danger to draw students into radicalisation, even when its legal. So when should universities control legal speech?

How do you advise universities on the identification of student vulnerabilities?

What are the factors that render students particularly vulnerable?

How can and how do universities support vulnerable students under Prevent?

What is the purpose of Prevent?

Safeguarding: Welfare and policing

What makes a policy or procedure one of safeguarding?
(follow up: Is it the actual activity that is carried out by the university or the intent for which it has been carried out?)

Can the activity of the police ever be not policing?

Where does one draw the line between their welfare practices and their policing practices?

What is the point of the new general data return that requires universities to report all welfare incidents? How much information are universities asked