

**LONDON SCHOOL OF ECONOMICS AND POLITICAL SCIENCE
PREVENT DUTY: 2017 ANNUAL RETURN TO HEFCE**

Approved by the LSE Council on 21 November 2017

Reporting period and format

1. As required by HEFCE, this return covers the period 1 August 2016 to 31 July 2017. There is therefore a one-month overlap with last year's return, which covered the period 1 October 2015 to 30 September 2016. The return is set out using the headings that HEFCE stated, in guidance issued in August 2017, that it expected providers' submissions to cover.

Context

2. This return is very similar to last year's: there have been no significant changes in circumstances or in the School's approach to implementing the Prevent duty, and no incidents in which the Prevent duty has come into play. However, one public event in March 2017 proved particularly controversial, and has prompted the School to adopt closer oversight of events likely to prove controversial. While not prompted by a Prevent concern, this move will have the side effect of increasing further the School's ability to identify Prevent-related concerns in advance and take appropriate action to mitigate them. This event, which was reported at the time to HEFCE, is explained in more detail below.

Outstanding actions from previous submissions

3. There are no such actions.

Risk assessment and action plan

4. The School's Prevent risk assessment and action plan were reviewed at the last meeting of the LSE Prevent Group on 6 November 2017 and by the LSE Council at its meeting on 21 November 2017, at which the Council approved this return. There have been no substantive changes to either document since they were last reported to HEFCE and they are therefore not included with this return.
5. The Prevent risk assessment and action plan will continue to be kept under review by the LSE Prevent Group, by the School's Audit Committee at least once a year (the last time was on 23 May 2017 and the next is planned for 22 May 2018) and by the LSE Council at least once a year.
6. Until September 2017, a risk related to the Prevent duty featured on the School's central Operational Risk Register. However, on 26 September 2017, the School Management Committee (the institution's top management team) decided to remove it from the register, on the grounds that, taking into account all the management action taken so far and on an ongoing basis to implement the duty, the net (residual) risk level was too low to justify inclusion at the institutional level. The risk remains on the risk register of the School's Risk and Compliance Unit. Should the

net risk ever rise again to a significant level, the risk will be reinstated onto the central School register.

Partnership and leadership

7. The School's governing body is the LSE Council. As mentioned above, the Council considered and approved this return at its meeting of 22 November 2017. In future Council will continue to assure itself that the Prevent duty is being actively implemented at least once a year, at the time of the Annual Return; Council will also consider the matter at any time throughout the year if it wishes to do so or if a member of the School's senior executive team asks it to. The School's Audit Committee will also consider implementation of the duty at least once a year.
8. The School's first Annual Return in 2016 was signed by Mr Alan Elias, then Acting Chair of Council and of the Court of Governors. This year's return is signed by Dame Shirley Pearce, who was appointed Chair in January 2017. Dame Shirley has taken a close interest in the implementation of the Prevent duty, including through a detailed briefing on 8 November.
9. The Prevent lead at LSE is the Head of the Risk and Compliance Unit (whose job title until 31 July 2017 was Director of Governance, Legal and Policy Division). The Prevent lead plays an active role in the London Higher Education Prevent Network, which met most recently on 12 October 2017, and hosted a previous meeting on 20 February 2017 at LSE. The Prevent lead also plays an active role in the informal Russell Group Prevent leads' forum, and hosted the forum's last two meetings at LSE on 27 October 2016 and 28 April 2017.
10. On 28 June 2016, the School Management Committee approved the template of a data-sharing agreement for use with third parties in respect of compliance with the Prevent duty. This template was based on a version circulated in the London Higher Education Prevent Network, adapted for LSE use and incorporating the advice of the School's legal advisers. It refers to the principles for the sharing of data as set out in the Prevent statutory guidance and covers the legal basis for sharing, the internal LSE procedure and the requirements for consent (where appropriate and possible), security, confidentiality and record-keeping. The internal procedure requires a considered recommendation from the LSE Prevent Group and – where the data to be shared is personal data – the express approval of the LSE Director, or in her absence a Pro-Director deputising for her, in accordance with the Data Protection Act 1998 and if necessary any advice from the School's legal advisers. The template recognises that review may be required on the entry into force of the General Data Protection Regulation (replacing the DPA) on 25 May 2018.

Active and effective implementation of Prevent-related policies

a. External speakers and events

11. LSE has for many years had a large and vibrant programme of Public Lectures and other events, many of them also public. Given the nature of the School's social science focus, a substantial number of these events touch on controversial issues in current world affairs. Therefore, the School'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. In practice, the introduction of the statutory guidance required no substantive change to the School's existing

procedures for the risk-assessment and planning of events and for the mitigation of the risks around events likely to prove controversial. The statutory duty did however require extensive briefing and training of most staff involved in event planning; more details are given below. With the help of HEFCE, we also improved our event-related guidance and other documentation to incorporate appropriate references to Prevent.

12. The School's approach has in most respects continued to serve the institution well. A handful of event proposals during the reporting period were escalated to the first level of management oversight for possible consideration under the Prevent duty, but in all cases it was rapidly found that no Prevent concern was in play. There is therefore a nil entry in the data return for issues escalated to the highest internal level for approval. However, one public event in March 2017 became disrupted by sections of the audience arguing against others, and it subsequently gave rise to a number of complaints to the School from internal and external parties. HEFCE guidance requires case studies to be anonymised so full detail will not be provided here. However, in brief, allegations were made that the main speaker at the event and some audience members were anti-Semitic; counter-allegations were made denying this. At least one external party wrote to the School claiming that we had failed to implement our duty under the Prevent guidance. In the expectation that a complaint to that effect would be made to HEFCE, the School reported the issue to HEFCE along with our judgement that at no point had the Prevent duty come into play.
13. In considering the March occasion afterwards, we judged that it was a reminder that what happens at campus events, even if no clear contravention of the law is identified, can work against the values and behaviour we try to promote at LSE, and risk detracting from an atmosphere of respect and tolerance. Such an atmosphere is important to maintaining a culture in which radicalisation is unlikely to take hold. Key learning points from the incident were:
 - School policies and procedures applying to event organisation do cover the areas that were in contention at the March event, such as audience behaviour. However, it was not clear that all event participants were being given unambiguous guidance on acceptable and unacceptable behaviour and practices.
 - School policies and procedures were not always appropriately followed by event organisers, chairs and others.
 - More could be done to improve knowledge of and respect for School policies and procedures related to events, perhaps especially among staff for whom event organisation was only an occasional task.
 - It would be helpful for the School to consider whether it could arrive at a working definition of anti-Semitism, on which views can diverge sharply.
14. Bearing in mind the learning points from the March event, the School Management Committee decided in July 2017 to strengthen the risk-assessment and planning of events in order to ensure good order and mutually respectful debate at events, primarily through four measures:

- A small circle of staff experienced in risk assessment has been brought into the number of staff automatically notified of any event proposals, so that they can spot and flag any risks not already identified.
 - Policies and procedures applying to event organisation are to be overhauled and where possible simplified and better promulgated.
 - Academic units are being asked to nominate support staff to take part in a formal network of event organisers, who will have a brief to ensure that all relevant School rules and procedures are respected in event organisation.
 - Academic and support staff involved in event organisation will be offered periodic briefing, using existing channels.
15. The Head of Risk and Compliance Unit, who is also the School's Prevent lead, has been tasked with overseeing the introduction of these measures. While not introduced for Prevent reasons, as a side effect, the measures will increase further the School's ability to identify Prevent-related concerns in advance and take appropriate action to mitigate them.
16. Some research has been carried out into definitions of anti-Semitism, and the Chaplain and Interfaith Advisor has consulted Jewish staff and students. The School Management Committee agreed on 7 November that hate speech or discriminatory acts directed at Jews as Jews are anti-Semitic and wholly unacceptable. Equally, SMC agreed that criticism of the actions of the Government of Israel is not anti-Semitic unless there is some sort of additional evidence to show that it is motivated by hostility towards Jews as Jews.

b. Welfare

17. Prevent considerations and guidance remain embedded into the School's comprehensive guidance to staff on working with students in difficulty; this is titled Cause For Concern and is updated for the start of each academic year. A new Head of Student Services arrived at the School in September 2017, with some knowledge of Prevent from her previous position in another HEI, was briefed on Prevent by the Head of Risk and Compliance Unit on 3 October 2017 and has joined the LSE Prevent Group.

c. IT acceptable use policies

18. These are reviewed and scrutinised periodically by the School's Information Security Advisory Board, which is chaired by the Head of Risk and Compliance Unit who is also the School's Prevent lead, and supported by a full-time Information Security Manager and other specialist staff who keep a close eye on sector and IT industry developments.
19. For the last Annual Return in 2016, HEFCE asked institutions to report on their approach to web filtering in relation to the Prevent duty. We have considered this a number of times internally as part of the wider IT considerations mentioned in the previous paragraph. We have also raised it in external Prevent networks, such as the London HE Prevent Network and the informal Russell Group Prevent Leads' Forum. The situation at LSE remains as reported in December 2016. While LSE applies filters to certain types of content, we have not so far found an authoritative source of reference for websites and other online locations judged sensitive in the context of

Prevent. When we investigated a reference on JISC's website to "the Unlawful Extremism Content (Prevent) filters", we found that while there does appear to be such a source, its contents are not freely available but in this context are only available to a single company, one which provides material for the filtering service that JISC itself offers. This service is intended for small institutions; our enquiries quickly determined that even a small university like LSE would swamp the available resources as our internet connection is larger than the entire bandwidth available to the JISC service.

d. Pastoral care/chaplaincy support

20. The School's Chaplain and Interfaith Advisor has been a member of the LSE Prevent Group since its inception and is closely involved in the implementation of the Prevent duty. Since 2017 he has been joined on the Group by a new Associate Muslim Chaplain. The latter is a Dutch national who has come to us from working in Belgium, where there has been a considerable problem of radicalisation in recent years. We look forward to a strengthened programme of chaplaincy support for students of all faiths and none.
21. The LSE Faith Centre runs a number of innovative programmes to promote religious literacy, interfaith leadership and engagement with religion in the public sphere. These programmes serve and are enriched by probably the most diverse student body of any UK university; some two-thirds of LSE students come from outside the UK, from all regions, countries, cultures and religions. Key programmes are:
 - A Faith and Leadership course. This runs over seven evenings and a residential weekend and covers: short, creative introductions to the main world faith traditions from expert scholars and community leaders; the changing dynamics of religion in the world today and evolving models of secularism and religious pluralism; training in decision-making, mediation and reconciliation by people experienced in the field; and sessions with leaders in the different sectors studied at LSE (e.g. business, politics, law) from a range of different faith backgrounds.
 - Interfaith Encounter: an annual week-long trip to Israel and Palestine, supported by the Pears Foundation. The purpose is to look at the three religious traditions of this highly contested region of the world to see how they underpin today's conflict, but also how they might contribute to its resolution. There are visits to the sites of sacred significance to the three Abrahamic faiths and meetings with groups and individuals from all sides to hear their perspectives and to learn what they are doing to work for peace. The group meet and are hosted by Israelis and Palestinians, Muslims, Christians and Jews, including in a synagogue visit and Shabbat meal with Jewish families and an overnight stay in Bethlehem with Palestinian families and a visit to Aida refugee camp. The visitors hear starkly different perspectives and see challenging things which are discussed in groups each day. Students are left to make up their own minds and are asked only to participate with openness and a desire to learn from those seeking reconciliation and justice.

- Interfaith Buddies: The Faith Centre connects students across different faiths and backgrounds. They set them a question to discuss in groups with a student facilitator. Throughout one term the groups are facilitated by participants from previous years. Then the students themselves take over, to talk and to listen, and to build friendships and understanding across diverse backgrounds.
- Faith Inclusion Training: The Faith Centre provides School-wide training on Faith Inclusion, on campus and in halls of residence. This training is available to Wardens and Subwardens of Halls of Residence and all student-facing staff in the School. The Centre also works more widely with student Faith Societies and LSE Students' Union groups to promote interfaith relations. This work includes reducing challenging interfaith conflicts on campus by supporting student leaders to be effective agents of dialogue and reconciliation, and looking at how the LSE can better enable students to feel safe and welcome on campus by supporting effective student campaigns to reduce incidences of anti-Semitism and Islamophobia.

22. We believe that our faith-based activities may be among the most advanced in the sector.

Staff training

23. In our previous (December 2016) Annual Return, we reported that we had trained a total of 145 people during the reporting period. Sessions were kept small – usually 12 participants or fewer – to allow interaction. The staff trained were mainly drawn from the key areas in the context of the Prevent duty: room bookings, communications, legal, governance, security, student services (include wellbeing, counselling and related areas), student residences, event approval and organisation, IT security and the faith centre. Sessions were also open to people not directly involved in implementation of the Prevent duty, and about ten students and a few academic staff joined. We ran a special tailored session for the School Management Committee.
24. As foreshadowed in our previous return, we built on the earlier training during the reporting period just finished, by requiring all members of the 60-strong LSE Security team to attend training (which for some was refresher training, as the team's senior officers and team leaders had already received training). To this end we ran tailored sessions with the help of the School's main legal advisers, Pinsent Masons, on 2, 9 and 16 February 2017. 57 staff attended and the few who did not were offered separate sessions.
25. We are currently considering how, when and to whom we should offer refresher training.
26. As reported previously, full briefing and training materials are available to all members of the LSE community at any time on or through the School's internal website. This includes a selection of the Leadership Foundation materials and links to the remainder. Our online study tool (Moodle) also hosts the Leadership Foundation's e-learning package giving an introduction to Prevent.

Student engagement

27. The LSE Students' Union (LSESU) passed a motion in January 2015 stating formally that it would not engage with the School on the Prevent Duty. Nevertheless, the School keeps the union informed of any developments related to the Prevent duty. On 29 March 2017 and 22 August 2017, the School held two well-attended briefing sessions on free speech and Prevent for LSESU staff; these sessions included talks by the School's legal advisers. The LSESU have in place an effective process for risk-assessing and planning events held under their and their student societies' auspices, and they consult officers of the School if they have any issues or concerns. No LSESU or student society event during the reporting period raised concerns under the Prevent duty.

28. The School negotiates a Memorandum of Understanding with the LSESU annually (annually because the elected sabbatical officers tend to change annually and may serve two terms at most). In the MoU, the School and LSESU agree that the latter will respect key School policies and procedures where relevant; these include the Code of Practice on Free Speech, which sets out the procedure for handling events or speakers which might pose concerns on a number of fronts, including the Prevent duty.