

# EQUALITY ANALYSIS (EQUALITY IMPACT ASSESSMENT): THE PREVENT DUTY AT LSE

This analysis is designed to help the School take action to improve services and practices which affect staff, students and other service users at LSE.

In completing this analysis, the School has considered the impact that implementation of the statutory Prevent Duty might have on particular social groups within the School community.

The analysis also aims to demonstrate that the School promotes equity, diversity and inclusion.

| 1. Project Details                             |   |
|--|---|
| What is the project (policy, function, service | Implementation at LSE of the Prevent duty                   |
| etc.) being assessed?                          |   |
| Is it new or existing?                         | A statutory obligation since Sep 2015                       |
| Department or Division responsible             | Risk and Compliance Unit                                    |
| Head of Service                                | Robin Hoggard   |
| Policy Author (postholder title, name)         | The duty is laid down in statutory guidance and implemented |
|  | in English universities according to a framework set out by |
|  | HEFCE, who act as regulator                                 |
| Author of Equality Analysis                    | Robin Hoggard   |
| Date of completion                             | 16 February 2018  |

#### 2. Aims and Objectives

Briefly describe the aims and objectives of the project.

The purpose of the Prevent duty in universities is to identify individuals deemed to be vulnerable to radicalisation, and to help provide support to enable them to avoid being drawn into supporting or committing acts of terrorism.

### 3. Evidence Gathering and Engagement

a. What **evidence** has been used for this assessment? (Were there any gaps in the information at hand? If so, how did you address these gaps?)

Evidence has been gathered from discussions held with the LSE Students' Union and the Presidents/Co-Presidents of the LSESU Islamic Society as follows:

9 Nov 2015: Mahatir Pasha (LSESU part time BME Officer) and Obai Afifi (LSESU Islamic Society) with Robin Hoggard and Hannah Bannister (Head of Student Services).

10 Nov 2016: Mahmoudat Sanni-Oba (LSESU Islamic Society) and Busayo Twins (LSESU General Secretary) with Robin Hoggard, Hannah Bannister and Jim Walters (Chaplain & Interfaith Adviser).

29 March 2017 and 22 Aug 2017: sessions on Prevent and free speech for LSESU staff and sabbatical officers, with Julian Sladdin (Pinsent Masons), Kevin Haynes (Head of Legal Team) and Robin Hoggard.

b. Who have you engaged and consulted with as part of your assessment?

In addition to the above, this assessment has been considered and agreed by the members of the LSE Prevent Group, which includes representation from, among others, Student Services, Academic Board, Room Bookings, Chaplain and Interfaith Adviser and the Equity, Diversity and Inclusion (EDI) team.

# 4. Project Assessment

Consider whether your project might have an impact on various groups identified within the categories listed below and explain why you have reached this conclusion.

Please tick ( $\mathbf{v}$ ) the identified level of impact (positive, negative, or no impact) and provide details of your findings.

(See Appendix for questions to ask yourself on each category when considering the impact of your project)

|                        | Positive | Negative | No           |  |
|------------------------|----------|----------|--------------|--|
|                        | impact   | impact   | impact       | Details of your findings   |
| Race                   |          |          | $\checkmark$ |  |
| Religion and/or belief |          | V        |              | Some students and student<br>representatives have expressed concern<br>that the Prevent duty stigmatises the<br>Muslim community and has a chilling<br>effect on freedom of speech within the<br>university. About 7% of LSE students self-<br>identify as Muslims.<br>The Prevent duty is of course aimed at all<br>forms of terrorism irrespective of<br>ideology or other motive behind it.<br>However, to date, no student or student<br>representative has expressed concern<br>that the duty might stigmatise adherents<br>of, for example, far-right ideologies that<br>might be linked to support for terrorism. |
| Sex (Gender)           |          |          |              |  |
| Gender Identity        |          |          |              |  |
| Disability             |          |          |              |  |
| Age                    |          |          |              |  |
| Sexual orientation     |          |          | $\checkmark$ |  |

| Marriage and/or civil partnership                                   |  | N            |  |
|---|--|--------------|--|
| Pregnancy and/or<br>maternity (including<br>surrogacy and adoption) |  | $\checkmark$ |  |
| Other identified group (e.g. carers)                                |  |              |  |

| 5. Action Planning  |   |   |   |
|---|---|---|---|
| How do you intend to <b>mitigate or eliminate</b> any negative impact identified?   | If a positive<br>impact is<br>identified, how<br>do you intend to<br>promote or<br>develop this<br>opportunity? | Where negative<br>impact has been<br>identified, can it<br>be <b>justified</b> ? If so,<br>explain how. | Lead and<br>Timeframe   |
| The LSE Prevent lead, overseen by the LSE<br>Prevent Group, will seek to ensure that the<br>Prevent duty is never applied in such a way as to<br>impact negatively on Muslim students, on the<br>School community more widely or on freedom of<br>speech within the law. In particular, Prevent duty<br>briefing at LSE emphasises that the duty is aimed<br>at terrorism of all types, and that it does not in<br>any way change the definition of free speech<br>within the law. To date, over 200 staff in key<br>areas have been trained in the duty, and in 2018<br>a programme of training for other staff, students<br>and new starters in key areas is under way. Staff<br>previously trained are being offered refresher<br>training.<br>The School has made online EDI training<br>mandatory for all staff. As of 18 Jan 2018, 2447<br>staff (84%) had completed it. Unconscious bias<br>workshops have been arranged in all 26 academic<br>departments.<br>The LSE Faith Centre, led by the Chaplain and<br>Interfaith Adviser, runs a number of innovative<br>programmes to promote religious literacy,<br>interfaith leadership and engagement with<br>religion in the public sphere. Key activities | N/A   |   | LSE Prevent lead<br>and LSE Prevent<br>Group as<br>appropriate.<br>Ongoing. |

| <ul> <li>A Faith and Leadership course</li> <li>Interfaith Encounter, an annual week-<br/>long trip to Israel and Palestine</li> <li>Interfaith Buddies connecting students of<br/>different faiths</li> <li>Training on Faith Inclusion</li> </ul>  |  |
|--|--|
| While not directly relevant to the Prevent duty,<br>the Faith Centre activities help create and<br>maintain trust and understanding between<br>students of all faiths and beliefs, including non-<br>religious beliefs.  |  |
| The LSE Prevent lead plays an active role in the<br>London HE Prevent Network and the Russell<br>Group Prevent Leads Forum, and meets regularly<br>with the coordinator allocated to LSE from the<br>Department for Education. These contacts enable<br>constant benchmarking and sharing of good<br>practice. |  |

### 6. Monitoring and Review

How will you monitor the impact of your project once it has been put into effect?

Through meetings of the LSE Prevent Group (2-3 per year) and periodic consultations with student representatives such as those mentioned above.

All main documents relating to the implementation of the Prevent duty at LSE are lodged on web pages accessible to the entire LSE community, and comments are welcomed. However, if the case of any individual should ever need to be considered under the Prevent duty (there has been none to date), the relevant records will be held securely in accordance with the relevant legislation (the Data Protection Act until 24 May 2018 and the General Data Protection Regulation from 25 May 2018 onwards).

Equality Analysis Sign-Off Signature and Date: RR Hoggard 16 February 2018

Review Date: January 2020

# 7. Equality Analysis

There is no policy document for the Prevent duty; the policy is set out in the Counter-Terrorism and Security Act 2015 and the accompanying statutory guidance, which has been approved by Parliament. However, we intend to include the need for a review of this document in the relevant iteration of the LSE Prevent Action Plan.

# APPENDIX - IMPACT ON PROTECTED GROUPS – QUESTIONS TO CONSIDER

| Protected<br>Characteristic          | Questions to consider, where appropriate, when assessing the impact of your policy, function, service or practice  |
|--------------------------------------|--|
| Race                                 | <ul> <li>Do you actively engage with and build positive relationships with black and minority ethnic groups across campus?</li> <li>Is your workforce student body and/or governing body representative of the demographic around you in terms of race?</li> <li>Do you challenge prejudice, stereotypes, unconscious bias about different racial groups within the environment which you work?</li> </ul>   |
| Religion and/or<br>belief            | <ul> <li>Do your services take account of different religious needs e.g. an area for prayer times,<br/>religious days and festivals, times of day staff, students or service users may wish to<br/>access a service, differing meditation requirements for those identifying with different<br/>genders?</li> </ul>  |
| Sex (Gender)                         | <ul> <li>Do your services appreciate that those with different genders may require different ways of doing things to meet their individual needs?</li> <li>Are your services equally accessible those with different genders - time and location?</li> </ul>   |
| Gender Identity<br>(including trans) | <ul> <li>Does your service meet needs of those with different gender identities?</li> <li>Are your records reflective of the gender identity of trans staff, students or service users and do your staff feel confident and well-versed enough to communicate this appropriately?</li> <li>Have you thought about training and confidentiality issues?</li> </ul>  |
| Disability                           | <ul> <li>Do you engage with staff, students and service users to ensure that you have made appropriate reasonable adjustments to support them in their role?</li> <li>Have you given equal measure to physical (hearing, seeing, etc), hidden (mental health, etc.) and learning (autism, etc) disabilities?</li> <li>Is information and services offered accessible to a range of disabled staff, students and service users? (consider the venue, location, signage, type of furniture, lecture capture etc.)</li> <li>Has disability awareness training been offered to staff in your department/division?</li> </ul> |
| Age                                  | <ul> <li>How do you engage with people of different age groups across the School? Do you adopt different communication methods which vary for age groups?</li> <li>Accessibility of services – have you considered location and time?</li> <li>Do you use comprehensive, inclusive language and imagery?</li> <li>Does the service you offer, reflect the age profile of your workforce and/or student body?</li> </ul>  |

| Protected<br>Characteristic   | Questions to consider, where appropriate, when assessing the impact of your policy, function, service or practice   |
|---|---|
| Sexual<br>orientation   | <ul> <li>Do you communicate and adopt a zero tolerance approach to homophobia, biphobia among staff, students and service users across campus?</li> <li>Do your publicity material, policies, practices, functions and services include reference to staff, students and service users of any sexual orientation?</li> </ul>  |
| Marriage and civil partnership  | <ul> <li>Is equal representation and fair treatment of marriage and civil partnership reflected in your publicity, information, policies, practices and services?</li> <li>Have you thought about access and confidentiality issues?</li> <li>Is your service provision accessible to all those who might benefit from it?</li> </ul>   |
| Pregnancy and<br>maternity<br>(including<br>surrogacy,<br>adoption and<br>shared parental<br>leave) | <ul> <li>Do your services support pregnant women or breastfeeding mothers or staff, students and service users with children?</li> <li>Is your policy, function, practice, service accessible for all e.g. teaching hours</li> <li>Do you offer flexible working and/or job-sharing options to support pregnant women, those involved in adoption and surrogacy, and staff and students with children?</li> </ul> |
| Other identified<br>groups (e.g.<br>carers)   | <ul> <li>Do your services support staff or students and service users who have significant caring responsibilities?</li> <li>Have you thought about how your service provision would potentially have an impact on other identified groups?</li> </ul>  |