


Explaining regulatory intermediaries' compliance through the accountability regimes framework

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Abstract

This article assesses how accountability relations between intermediaries, regulators, and regulatory targets affect intermediary non-compliance. Regulatory intermediary theory (RIT) maps how intermediaries, who are given responsibility but often lack hierarchical accountability to regulators, have multiple roles in the process of regulatory compliance. Intermediaries need to comply with the tasks that they have been delegated to perform. However, beyond acknowledging the importance of complex actor relations, RIT lacks a clear theory of how these relationships may affect the realization of regulatory intentions during policy implementation. This article introduces the accountability regimes framework (ARF) to model the multiple formal and informal roles of intermediaries, identify accountability dilemmas, and theorize the conditions under which they trigger intermediary non-compliance. The ARF is applied to study “Prevent Duty,” an anti-radicalization policy which requires social science lecturers in British universities to report students deemed at risk of radicalization to the Home Office. Semi-structured qualitative interviews conducted with intermediaries in May 2021 (N=19) are analyzed using crisp-set Qualitative Comparative Analysis. Results support the ARF's core claims: in a politicized context of mandated, interpretive intermediation, the presence of multiple accountability dilemmas can trigger non-compliance, while their absence is related to compliance. Institutions can mitigate this intermediary non-compliance by providing training to intermediaries. Results additionally show that the mandated, politicized intermediaries may informally appropriate the regulator's role of risk assessment. The ARF allows RIT scholars to understand intermediaries' compliance as a problem of accountability.

Keywords: accountability regimes; prevent duty; regulatory intermediaries; compliance; Qualitative Comparative Analysis (QCA)

This article assesses how accountability relations between intermediaries, regulators, and regulatory targets affect intermediaries' decision to report targets to regulators. Regulatory intermediary theory (RIT) has introduced a focus on actor relations in the study of regulatory regimes (Tobin et al., 2023). Mediating the relationship between regulators (R) who make rules and rule-takers or targets (T) who have to align their behavior with these rules, regulatory intermediaries (I) draw on their own capabilities and legitimacy to provide assistance to regulators and/or targets (Abbott et al., 2017). For example, the British “Prevent Duty” anti-terrorism policy was introduced in 2015 to prevent its targets, amongst them university students (T), from becoming radicalized. However, the regulator has acknowledged that, due to their knowledge of student behavior, university lecturers can much more effectively and efficiently identify potential targets than the regulator itself could. It therefore legally requires lecturers (I) to report

students at risk of radicalization to the Home Office (R), which then performs a risk assessment and decides on further action (Thomann et al., 2023).

By presenting university lecturers with an additional mandatory reporting duty on top of their original job profile, Prevent Duty “responsibilizes” them: a regulator coerces private actors to act as their monitor, enforcer, and trustee, assigning them primary responsibility for public security (Levi-Faur, 2019, p. 22; Shamir, 2008). Reflecting the “conflicts that might arise when delegating responsibility over value-loaded questions” (Euchner, 2022, p. 838), Prevent Duty has engendered strong political opposition (Lewis, 2018) due to concerns about academic freedom, freedom of speech, and the policy’s adverse effects on discriminatory profiling (Gayle, 2019). Accordingly, Thomann et al.’s (2023) survey of 809 university lecturers reveals that they often appear reluctant to implement Prevent Duty, preferring informal courses of action over formal reporting of students.

Intermediaries not only play a well-explored role in promoting target compliance. Being an important link in the regulatory chain, they also have to comply themselves with the function formally or informally delegated to them (Brès et al., 2019; Euchner, 2022). *Intermediary non-compliance* here denotes regulatory intermediaries’ behavior, whether substantively desirable or undesirable, that is inconsistent with regulatory directives (Gofen, 2014; Huising & Silbey, 2021; Weaver, 2014). As hierarchical settings increasingly give way to hybrid arrangements, intermediaries, without strong formal accountability to regulators, become essential for making regulation happen (Havinga & Verbruggen, 2017). For example, if a university lecturer takes the discretionary decision not to report a student who fulfils Prevent Duty’s reporting criteria, then this prevents the Home Office from performing a risk assessment.

Reflecting its relative novelty, most contemporary RIT scholarship explores the different forms, functions, and governance modes of intermediation, intermediaries’ varying strategies, and the roles and relationships of regulators and targets (e.g., Brès et al., 2019; Euchner, 2022; Kourula et al., 2019; Levi-Faur, 2019). Yet, beyond this description, “to understand regulatory outcomes, [RIT] interactions need to be taken into account” (Abbott et al., 2017, p. 20). However, RIT currently lacks an explanatory model of how intermediaries’ complex relationships concretely affect the realization of regulatory intentions during policy implementation. This article argues that we need to understand intermediaries’ (non-)compliance as a problem of accountability. Accordingly, the accountability regimes framework (ARF), originating from street-level bureaucracy theory (Hupe & Hill, 2007), can fill this theoretical gap in RIT.

The ARF models intermediaries’ “inherently relational” status (Tobin et al., 2023, p. 556) as a problem of *accountability*, where a regulatory actor feels an obligation to justify their behavior to another significant actor within a web of multiple formal or informal social relationships. The ARF was developed by Hupe & Hill (2007) to study policy implementation and later refined to capture the interacting demands that follow from these accountability relations (Hupe & van der Krogt, 2013; Thomann et al., 2018, 2023). If intermediaries’ various regulatory and social roles create incongruent goals (Euchner, 2022), conflicting roles, interests, or pressures, then they face accountability dilemmas. The ARF offers a systematic tool to analyze complex accountability relationships embedded in institutional contexts. We ask: how do accountability relations between intermediaries, regulators, and targets affect intermediary compliance? By offering concretely testable expectations about the effects of accountability dilemmas on intermediaries’ behavior, the ARF helps us understand why regulatory intermediaries comply or do not comply with regulations that contradict their social obligations or political beliefs (O’Leary, 2019; Thomann et al., 2023).

Next, we discuss regulatory intermediation in the hybrid regime of the UK’s Prevent Duty policy. We then introduce the ARF to model actor relations and derive expectations on how accountability dilemmas affect intermediary compliance. The article draws on 19 qualitative semi-structured interviews conducted in May 2021 with social science lecturers across the UK who had real-life experience of potentially having to apply the Prevent Duty policy. Crisp-set Qualitative Comparative Analysis (csQCA) is complemented with targeted in-depth qualitative case studies. The results illustrate how the ARF advances the study of regulatory intermediaries by allowing scholars to theorize and empirically analyze how accountability relations shape intermediaries’ role in making regulatory compliance happen.

Theory and expectations

In 2015, the UK’s Counterterrorism and Security Act (CSA) introduced a statutory obligation for universities to train teaching staff to recognize the signs of radicalization and establish procedures for them to report anyone they suspected of being radicalized. This hybrid regulatory regime “responsibilizes”

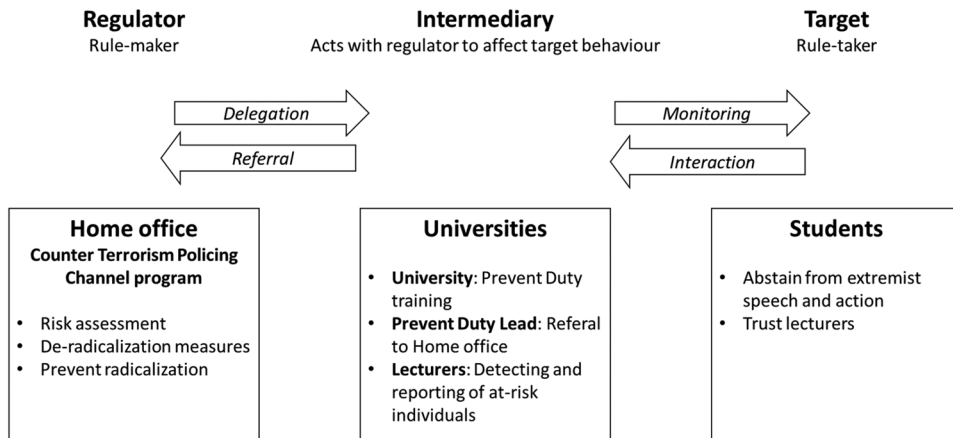


Figure 1. RIT relations in Prevent Duty regulatory regime.
Source: own illustration, based on Abbott et al. (2017).

actors from the private and voluntary sectors who are deemed to be in a better position to achieve a regulatory goal compared to the public regulator (Héritier & Lehmkuhl, 2008; Levi-Faur, 2011; Shamir, 2008). Since social science lecturers regularly discuss a variety of societal and political topics with students, they are more likely to discover those who harbor extremist thoughts. Requiring lecturers to monitor these interactions, therefore, appears to be an efficient and effective way of achieving Prevent Duty’s goal of preventing radicalization. Figure 1 maps the regulatory tasks and relationships.

The Home Office’s Counter Terrorism Policing unit acts as the regulator. It delegates the task of reporting students at risk of radicalization (the targets) to the universities as mandated intermediary organizations with access to targets (Kourula et al., 2019). Universities, as intermediary institutions, formally act on behalf of the regulator to achieve the regulatory goal. Within universities, Prevent Duty assigns specific individuals a role as regulatory intermediaries. The lecturers must monitor and report the student to a designated internal administrator, such as the dean or head of department, who is the “Prevent Duty lead.” The Prevent Duty lead will convene a broader panel of administrators (Thomann et al., 2023). This panel decides the appropriate course of action between either directly referring the student to the Home Office’s multi-agency de-radicalization “Channel” program or contacting the police, who will screen and assess whether to refer the case (Whiting et al., 2021). If a student is referred, then the regulator will “make a multi-agency safeguarding assessment” and, if warranted, take measures to “support vulnerable people to move away from harmful activity.”¹

Unlike whistleblowers, universities, Prevent Duty leads, and lecturers become mandatory reporters under Prevent Duty (Greenberg, 2021). They are legally required to report suspicious cases, whether they want to or not. This formal “responsibilization” arguably renders regulatory intermediaries as rule-takers (Levi-Faur, 2019)—it requires intermediary compliance for the regulatory regime to work. Not only should students as targets trust lecturers enough to discuss their thoughts with them, but they should also ultimately abstain from drifting into radicalization. Also at the institutional level, universities should train lecturers and perform referrals of reported students. However, universities vary significantly in whether and how they provide formal Prevent Duty training, with institutional non-compliance (no training at all) reported by 36% of surveyed lecturers (Thomann et al., 2023). This institutional non-compliance puts the spotlight on individual lecturers as intermediaries who should report students meeting the radicalization criteria. Whilst intermediaries always operate in an institutional context, we analytically focus on individual lecturers’ compliance with their reporting duty in the intermediation chain since lecturers’ reporting is both a necessary condition for, and a highly likely step, to lead to a referral.

Hybrid governance requires a shadow of hierarchy for intermediaries to align their behavior with the regulatory goals (Euchner, 2022; Héritier & Lehmkuhl, 2008). Yet, for the regulators, intermediary compliance with Prevent Duty is almost impossible to monitor and enforce in everyday student–lecturer

¹ <https://www.gov.uk/guidance/making-a-referral-to-prevent#how-a-referral-is-assessed>.

interactions. University lecturers, as individual regulatory intermediaries, thus have the discretion and power to diverge from the rules in practice.

Prevent Duty is a uniquely politically sensitive, contested, and ambiguous regulation. Even though the Home Office provides guidance and training materials on its website, radicalization remains difficult to detect in practice.² The concept of extremism is vague and open to interpretation (Sedwick, 2010; Thomann et al., 2023). Prevent Duty is thus a case of “interpretive intermediation” with official delegation of the reporting task, but little explicit guidance on its execution (Brès et al., 2019). Moreover, the complex institutional and actor landscapes increase the number of pressures on intermediaries (Euchner, 2022). The intermediaries’ resulting informational advantage and the potential for goal incongruence can enhance the importance of informal actor relations and trigger non-compliance.

In such a context, the question of intermediary compliance becomes key for regulatory outcomes. The ARF models how hybridity can imply conflicting accountability relations that translate into non-compliance by regulatory intermediaries.

Understanding intermediary compliance as an accountability issue

Regulatory compliance often requires answerability through a formally defined mechanism within specific institutional arrangements or relations in which a regulatory actor can be held to account by a forum (Bovens et al., 2014; Huisling & Silbey, 2021; Papadopoulos, 2023). Accountability is generally defined as “a mechanism relating an account-giver to an account holder, which should have an impact on the decisions and behaviors of the account-giver” (Aleksovska et al., 2019, p. 1). Yet, regulatory intermediaries are also held accountable informally through a web of various social relationships, for example, with targets or peers (Euchner, 2022; May, 2005; Overman & Schillemans, 2022). The ARF (Hupe & Hill 2007; Hupe & van der Krogt, 2013; Thomann et al., 2018, 2023) recognizes both formal and informal accountability relations; “informal roles [of intermediaries] may even be more important than formal ones” (Brès et al., 2019, p. 128). It concentrates on the subjective perception of accountability and on the importance intermediaries attribute to different roles, social relationships, and demands (Overman & Schillemans, 2022). Accordingly, the ARF defines “accountability” as the social relationships in which intermediaries feel an obligation to explain and to justify their conduct to an accountability forum that they deem significant (Bovens, 1998, p. 172; Hupe & Hill 2007, p. 286).

The ARF maps “accountability regimes” as systems where different actors engage in social relationships that define specific sets of formal or informal norms and demands on how intermediaries should behave, called “action prescriptions.” These emerge from institutionalized contexts, the organization, work circumstances, and individual characteristics (see Table 1). Action prescriptions from different accountability regimes result in (subjective or objective) expectations for behavior that add up to accountability pressures on individual intermediaries, who subjectively attach different degrees of importance to different pressures (*reference*). These pressures constrain and guide the intermediaries’ compliance (Hupe & Hill, 2007; Hupe & van der Krogt, 2013). Table 1 summarizes the accountability regimes for the UK’s Prevent Duty policy, which we now discuss.

First, *public-administrative accountability*, whose source is the public regulator (the state, in particular the Home Office for Prevent), implies following formal rules and regulations as they are written (rule pressure). Hupe & Hill (2007, p. 289) subsume under this accountability regime “three forms of accountability—political, legal and ‘New Public Managerial’ [because they] share a vertical orientation, while their common basis is an authoritative and legitimate jurisdiction.” In their role as “state agents” (Maynard-Moody & Musheno, 2000), lecturers are expected to follow the guidelines and concrete procedures of Prevent Duty in cases where they suspect radicalization. Legal and internal university procedures secure public-administrative accountability toward law enforcement, managers, and/or the police.

Second, from interactions between professionals with specific expertise emerge shared norms, standards of conduct, and values as the source of *professional accountability* (Rutz et al., 2017). Lecturers as professionals are expected to provide high-quality education while also protecting and exercising academic freedom. Professional pressure is exercised via informal exchanges with other lecturers and peer review mechanisms, also toward professional associations such as unions. During faculty meetings, lecturers may discuss how they can teach healthy values of critical intellectual engagement with

2 See <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen3.html?subsector=Lecturer>.

Table 1. Summarizing the accountability regimes.

Accountability regime	Public-administrative	Professional	Participatory/ societal	Political-ideological
<i>Intermediary's role</i> <i>Accountable System</i> <i>to whom?</i>	State agent	Professional	Citizen agent	Political animal
	State/Home office	Profession	Society	Democracy / political system
<i>Organization</i> <i>Individual</i> <i>Action prescriptions</i>	Law enforcement	Professional associations / communities (e.g. unions)	Sectoral institutions	Political organizations and networks
	Managers/ Police	Peers	Targets	Citizens
	Rule pressure	Professional pressure	Participatory/ societal pressure	Political-ideological pressure
	Formal rules	Professional norms	Client needs/ expectations	Political and ideological principles
<i>Accountability ensured via</i>	Legal or internal/ department-level formal procedures	Peer expectations and review	Feedback from and exchanges with clients	Political considerations and discussions

Adapted from Thomann et al. (2018, 2023).

potentially extremist content to students. *Societal accountability*, instead, arises from the expectations held by society, sectoral institutions, and targets, termed societal pressure (Hupe & Hill, 2007; Hupe & van der Krogt, 2013). Lecturers in their role as “citizen agents” (Maynard-Moody & Musheno, 2000) act as mentors who provide pastoral care and ensure equal opportunities for their students. Lecturers practice participatory accountability in their everyday encounters and exchanges with students, for example, when receiving feedback from them. They may seek to create a trusting, nurturing, and mentoring relationship with students that facilitates constructive conversations and learning processes. Finally, intermediaries as “political animals,” that is, democratic citizens and voters care about political and societal issues, have discrete political preferences, and, accordingly, participate in informal social networks or formal organizations, as well as the political and democratic system at large (O’Leary, 2019; Thomann et al., 2023). Under *political-ideological accountability*, the actions that are considered politically appropriate will make intermediaries pursue outcomes that are in line with political, ideological, or ethical principles. Lecturers may practice political-ideological accountability by taking part in political discussions (Thomann et al., 2023). They perceive Prevent Duty to align with political values and the rule of law to various degrees (Gayle, 2019; Lewis, 2018; Whiting et al., 2021).

Table 2 defines intermediary non-compliance and the five explanatory factors applying the ARF in the Prevent Duty case, and lists examples.³ I argue below why these five conditions are especially (though not exclusively) relevant in this particular context. First, we expect compliance to be higher when intermediaries operate in an institutional context providing training on Prevent Duty. As Abbott et al. (2017, p. 24) highlight, “intermediaries do not operate in a vacuum. Like other actors, they are embedded in institutional environments that shape their roles, opportunities for action, capabilities, and legitimacy.” Insufficient information can increase the costs of compliance and thus act as a barrier (Weaver, 2014). By decreasing information barriers, we expect that having received formal training on Prevent Duty by their university (TRAIN) should positively shape lecturers’ understanding and awareness of their intermediary role, the regulatory process, and their capability to appropriately perform their function.

Second, “intermediaries are most likely to play these roles when they are motivated by the regulatory goals themselves” (Abbott et al., 2017, p. 28). Thus, when lecturers refer strongly to rule pressure (RULE), they attach a high subjective importance to adhering to the formal rules of Prevent Duty. This motivates lecturers to report students at risk of radicalization, which is conducive to compliance (Thomann et al., 2023).

Third, *accountability dilemmas* affect regulatory outcomes (Thomann et al., 2018, p. 303). Accountability dilemmas occur when multiple action prescriptions create competing demands and values—when some

³ Market values such as efficiency and competition have proven irrelevant in the context of Prevent Duty (Thomann et al., 2023).

Table 2. Outcome and conditions.

Concept	Definition	Application in Prevent Duty context	Ceteris paribus, the condition is expected to trigger...
<i>Outcome</i>			
Compliance COMP	Adherence (behavioral intention and/ or actions) of the policy implementer to the formal policy	Intention and/or decision of the lecturer to report a case of suspected student radicalization, as legally required by Prevent Duty	
<i>Conditions</i>			
Formal Prevent Duty training received TRAIN	Regulatory intermediary is formally informed and trained about the regulatory content and procedures	Lecturer has received formal training about Prevent Duty from their employer	Compliance
Strong reference to rule pressure RULE	High subjective importance that the regulatory intermediary attaches to adhering to formal rules	Lecturer prioritizes implementing Prevent Duty as intended to prevent extremism in their daily work	Compliance
Rule-professional dilemma DPROF	Regulatory intermediary perceives adherence to formal rules to conflict with professional norms	Lecturer fears that having to apply Prevent Duty may cause them to compromise their standards of educating students and defending academic freedom	Non-compliance
Rule-societal dilemma DSOC	Regulatory intermediary perceives adherence to formal rules to conflict with target needs/expectations	Lecturer fears that having to apply Prevent Duty may conflict with their commitment to providing equal treatment, opportunity, mentoring, and pastoral care to students	Non-compliance
Rule-political dilemma DPOL	Regulatory intermediary perceives adherence to formal rules to conflict with political and ideological principles	Lecturer fears that having to apply Prevent Duty may cause them to compromise on their political and ideological principles and values	Non-compliance

action prescriptions are at the expense of or are incongruent with other action prescriptions (Thomann et al., 2018). Abbott et al. (2017, pp. 19–20) stress that having “diverse goals make[s] particular actors more or less suitable as intermediaries in specific situations; they may also produce conflicts of interest among regulators, intermediaries, and targets that make regulation difficult. (...) To understand regulatory outcomes, such interactions need to be taken into account.” Accordingly, accountability dilemmas can arise when the diverse goals of regulatory authorities, intermediaries, and targets lead to conflicts of interest for intermediaries. This is when they experience goal incongruence with the regulator (Euchner, 2022, p. 841), or when they have multiple conflicting roles (Abbott et al., 2017, p. 25; Brès et al., 2019; Havinga & Verbruggen, 2017). For example, religious organizations as regulatory intermediaries routinely have to manage value conflicts that influence compliance when implementing morality policies (Ciornei et al., 2023).

When experiencing accountability dilemmas, the intermediary perceives adherence to formal rules as conflicting with professional norms (rule-professional dilemma, DPROF), target needs/expectations (rule-societal dilemma, DSOC), or political and ideological principles (rule-political dilemma, DPOL). Prevent Duty can produce a rule-professional accountability dilemma when lecturers perceive that Prevent Duty’s reporting requirements limit academic freedom in teaching and research. A rule-societal dilemma arises, for instance, when lecturers feel that having to “police” students creates distrust in their mentoring relationship and may force them to act against students’ best interests. Finally, some lecturers report a rule-political accountability dilemma when they perceive the Prevent Duty policy as politically motivated, racist, and/or Islamophobic.

Smith et al. (2011, p. 3) point out that “problems of implementation (...) [are sometimes] magnified by a shift from hierarchy to networks and market forms of delivery.” Hybrid regulatory regimes involving a variety of actors make it more likely that multiple and conflicting accountability dilemmas for

intermediaries exist (Aleksovska & Schillemans, 2021; Hwang & Han 2017). By complicating the decision whether or not to comply, such dilemmas can introduce cognitive barriers to compliance (Weaver, 2014). Indeed, accountability dilemmas tend to trigger intermediary non-compliance (Ciornei et al., 2023; Thomann et al., 2023), as they require regulatory intermediaries to “take sides” and decide which pressure they prioritize (Aleksovska & Schillemans, 2021; Hwang & Han, 2017). Account-givers have the motivation to gain approval of those audiences they consider important in order to avoid negative consequences, build esteem, and gain power (Aleksovska & Schillemans, 2021). Intermediaries assume and identify with roles “they believe are supported by key referents and that are consistent with personal values and beliefs” (Webeck & Lee, 2022, p. 216). Consistent with role identity theory, the decision of which accountability pressure to prioritize will therefore tend to follow the extent to which intermediaries refer to a given accountability regime (Thomann et al., 2016, 2023), and depend on their discretion, incentives, and other factors affecting non-compliance. Therefore, *the stronger the accountability dilemma and the more of them that are expressed by the regulatory intermediary, the less likely they are to comply.*

As Hupe & Hill (2007: 281) stress, “Actors may be faced with situations in which rules are ambiguous or even contradictory (...) [they therefore] see themselves forced to make choices.” We expect that the influence of accountability dilemmas on non-compliance may depend on the intermediary’s reference to rule pressure. For example, a rule-political dilemma should only lead to non-compliance if it is comparatively unimportant for an intermediary to adhere to the formal regulations. Therefore, *accountability dilemmas will foster less non-compliance as the regulatory intermediary refers more strongly to rule pressure.*

Expression 1 formally states that we expect compliance when regulatory intermediaries are well-informed because they have received training, strongly refer to rule pressure, or do not experience any accountability dilemmas—where combinations thereof are also possible. The tilde sign “~” reads as “NOT,” the multiplication sign “*” reads as “AND,” the plus sign “+” reads as “OR,” and the forward arrow “→” signifies “is sufficient for”:

Expression 1:

$$\text{TRAIN} + \text{RULE} + \sim \text{DPROF} * \sim \text{DSOC} * \sim \text{DPOL} \rightarrow \text{COMP}$$

Conversely, expression 2 states that non-compliance should typically occur when an intermediary refers weakly to rule pressure, and/or experiences several accountability dilemmas, and/or is reluctant to implement the ambiguous Prevent Duty policy without formal training, or if these factors occur in combination.

Expression 2:

$$\sim \text{TRAIN} + \sim \text{RULE} + (\text{DPROF} * \text{DSOC} + \text{DPOL} * \text{DSOC} + \text{DPROF} * \text{DPOL}) \rightarrow \sim \text{COMP}$$

Data and methods

We recruited participants from a standardized, anonymous online survey sent to all Social Science lecturers at British universities (dataset 1, $N=809$; results reported in Thomann et al. 2023).⁴ We conducted semi-structured online interviews lasting between 20 and 60 min in May 2021 with those 35 respondents who opted in, confirmed a date for an interview upon contacting them, and showed up. Of these, 19 self-reported to have experienced a concrete situation where they either applied or could/should have applied Prevent Duty in their work as university lecturers (dataset 2; $N=19$). The cases we analyze are lecturers’ concrete, real-life experiences with a scenario that potentially implied applying Prevent Duty. If a lecturer reported having had more than one relevant experience, we asked them to focus on the most memorable and clear-cut or, if there were several of those, the most recent experience.

Transcripts range from 1,959 to 8,043 words. The questionnaire (Online Appendix Table A1) consisted of six questions about the lecturers’ experience with Prevent Duty. Each interview was coded by two independent, trained coders, whose codes were later double-checked and corrected by a senior scientist. Online Appendix Table A2 reports the full coding scheme, containing a mix of standardized codes and open copy-pasting of illustrative quotations.

⁴ This project received ethics approval by the University of Exeter.

Qualitative comparative analysis

We empirically analyze dataset 2 as the subset of lecturers who agreed to share a concrete real-life experience with Prevent Duty. We use crisp-set Qualitative Comparative Analysis (csQCA) (Oana et al., 2021) to capture the interplay of accountability reference and dilemmas that we theorized above. This allows us to empirically detect several alternative causally complex configurations of factors that are necessary and/or sufficient for compliance or non-compliance. Reflecting our theoretical assumptions, QCA further models how the presence of the outcome (compliance, COMP) may have a slightly different explanation than its absence (non-compliance, ~COMP).

First, we assess the necessary conditions that have to be present for the outcome to occur. To detect sufficient conditions, all logically possible combinations of conditions are displayed in the rows of a “truth table.” Truth table rows that are not observed in empirical cases are called “logical remainders.” Second, if enough cases in a given truth table row also display the outcome, the configuration is sufficient for the outcome. Through logical minimization, we derive the shortest possible logical description of those configurations of conditions, or “paths,” that are sufficient for the outcome (packages QCA and SetMethods) (Dusa, 2019; Oana & Schneider, 2018).

All QCA results must pass three tests: empirical consistency, empirical importance, and substantive importance (Oana et al., 2021). Consistency, the Proportional Reduction in Inconsistency (PRI), coverage, and Relevance of Necessity (RoN) parameters all range from 0 to 1. The online appendix presents the details, full results, and data and R replication files.⁵ We integrate csQCA with targeted case studies (Oana et al. 2021) to provide within-case evidence of the motivations and actions of the lecturers. Our interpretations particularly rely on quotations that provide “smoking-gun” evidence that strongly support a posited relationship (Mahoney, 2015).

Measurement and calibration

QCA models social phenomena as sets: for instance, while some lecturers did comply with Prevent Duty (COMP), others did not (~COMP). Table 3 summarizes the measurement and set calibration, and provides examples. Given the qualitative material, we focus on differences in kind using binary crisp sets. While differences in degree exist for all sets, it is not possible to capture them in a directly comparable manner from the interview transcripts. We use the theoretical method of calibration (Oana et al., 2021), based on the codes in Online Appendix Table A2, and documented each case. The results of the crisp-set QCA are replicated using fuzzy sets based on dataset 1 in Online Appendix Table A4.

Robustness and external validity

As the interviewees (dataset 2) were recruited from a bigger sample (dataset 1) that was drawn from the full population of UK-based social science lecturers (see Thomann et al., 2023), we can comprehensively assess the results’ external validity and robustness. The same sets were measured and calibrated for dataset 1 (Online Appendix Tables A3 and A4).

First, to assess potential selection bias, Online Appendix Table A4 compares the descriptive statistics for dataset 2 with the corresponding variables of dataset 1. Available sociodemographic information for dataset 1 (Online Appendix Table A4) suggests it is representative of UK-based social science lecturers. Demographic information on the interviewees cannot be disclosed for ethical reasons. However, comparison with dataset 1 shows that dataset 2 is representative regarding compliance and training levels, while stronger attitudes towards Prevent Duty are overrepresented. Online Appendix Table A4 discusses possible reasons. While self-selection bias cannot be fully precluded, these differences are likely an artifact of different levels of reactivity and social desirability effects of data collection methods. The differences become negligible when accounting for respondents choosing the indifferent middle category in dataset 1, which the interview situation in dataset 2 largely eliminated.

Second, to assess external validity, Online Appendix Table A8 replicates and discusses the results on dataset 1. This is a deductive test of the generalizability of the results from dataset 2 to dataset 1. The majority of the results are replicable. However, the scope of one necessary condition for ~COMP

⁵ <https://doi.org/10.7910/DVN/NGHLNQ>

Table 3. Operationalization and set calibration.

Set	Operationalization and calibration	Example
Compliance COMP	Present (1) in the absence of opposition/unwillingness to implement Prevent Duty, and/or if the lecturer reports its explicit application, including correct non-reporting after first suspicion	Compliance I17 “the alarm bells kind of went off. [The fellow students] gathered together more screenshots and material (...) I wanted them to act quickly so they didn’t spook the student, who was difficult to read. So, I had various people I could report it to instantly by email or phone call or text. (...) And then it started to go through the university system.” Non-compliance I7 “the administrator of the postgraduate programme revealed to me that this student had had at least two complaints prior to this (...) relating to comments about ethnic minorities in Britain. And that they had produced at least two pieces of assessed work (...) that were skirting the borderline of using history in service of racist narratives of a white British past. So that was the point when I faced the decision and decided that what I would do is meet with the student. That is also the point when I decided not to enact the Prevent protocols.”
Training received TRAIN	The lecturer reports having received formal training about Prevent Duty (1)	Training received I2 “I’d had WRAP at the university, which was like a half day session, (...) run in conjunction between the police and the prevent leads.” Training not received I31 “I’ve never had any training and I don’t know anything about the safeguarding around it.”
Strong reference to rule pressure RULE	Strong (1) if lecturer expresses the (felt) presence/relevance of rule pressure (implementing Prevent Duty as intended to prevent extremism) in daily work; and/or the opinion that it is generally important that Prevent Duty exists and is implemented in case of threat.	Strong reference to rule pressure I34 “I don’t want to do anything that would take me outside the law.” Weak or no reference to rule pressure I6 “I think it’s a very bad idea in general to intervene in educational settings with bureaucratic requirements, especially legal requirements. (...) So I strongly (...) think, that if we can possibly avoid any kind of bureaucratic or formal ways of dealing with difficult students, that’s a good thing.”
Rule-professional dilemma DPROF	Present (1) if lecturer explicitly expresses a conflict of professional pressure with Prevent Duty requirements in daily work—having to apply Prevent Duty may cause them to compromise standards of educating students and defending academic freedom	Rule-professional dilemma I18 “students spout out pretty extreme ideas all the time. They are at university (...) exploring what they think about things. And that, at least in my view, is the job. And so, when you are meant to be encouraging them to (...) push the boundaries and explore (...) what is supported by the evidence and what is effective (...) and then you are meant to be keeping an eye for when that seems to be working. I do not know where to go with that.” No rule-professional dilemma I21 “I’ve got to accept it because, you know, there are people out there, young adults that are being radicalised. And we have a duty as teaching, education staff to look out for it just in the same way as if it was welfare or safeguarding of abuse or anything like that.”
Rule-societal dilemma DSOC	Present (1) if lecturer explicitly expresses a conflict of societal pressure with Prevent Duty requirements in daily work—having to apply Prevent Duty may conflict with their commitment to providing equal treatment & opportunity, mentoring, and pastoral care to students.	Rule-societal dilemma I11 “You’re being asked potentially to inform a chain which leads eventually back to the police (...) I see that as being quite difficult. I’m much more comfortable with the idea that the university (...) owe the students that they work with (...) a pastoral duty of care for their well-being.” No rule-societal dilemma I15 “Prevent would be in that seamlessly. (...) my students are so apolitical (...) that it never comes up. But (...) it would just be part of everything I do all the time.”

(Continued)

Table 3. (Continued)

Set	Operationalization and calibration	Example
Rule-political dilemma DPOL	Present (1) if lecturer explicitly expresses a conflict of political-ideological pressure with Prevent Duty requirements in daily work—having to apply Prevent Duty may cause them to compromise on political and ideological principles and values.	<p>Rule-political dilemma</p> <p>I1 “I am essentially extremely suspicious of certain kinds of state involvement with people’s ideological development. (...) There’s all kinds of policy positionings that (...) are kind of manifested in Prevent, in terms of what are the consequences for people who get involved or get overreported through Prevent. How are the people who are involved in Prevent racialized (...)? How does that intersect with other forms of discrimination (...)? What are the risks to people who are already at risk disproportionately through carceral politics and the state? That basically informs my decision making, which is very unlikely, I’d say, to report somebody through Prevent.”</p> <p>No rule-political dilemma</p> <p>I3 “I think that we promote equality and opportunities of speech fairly well here. (...) I’m community safety minded, and I’m also anti discriminatory practice minded. So, I try and bring these two things together and make it work.”</p>

and three out of four sufficient conditions for COMP is limited to dataset 2. Thus, the results explaining non-compliance are more generalizable than those for compliance. Third, however, a separate exploratory QCA for explaining COMP on dataset 1 ([Online Appendix Table A9](#)) supports all substantive interpretations that are drawn based on analyzing dataset 2.

Fourth, the small sample size means not all logically possible configurations of conditions are observed empirically. Observing 47% of truth table rows empirically is commonplace. For comparison, in the much larger dataset 1, 75% of rows are empirically represented (see [Online Appendix Table A5](#)). Limited empirical diversity owes itself to arithmetic rather than logically impossible or clustered remainders. We calculate and report in the [online appendix](#) conservative, intermediate, and parsimonious solution types, which make different assumptions about logical remainders during logical minimization. We substantively interpret enhanced intermediate solutions that apply theoretically informed assumptions about the sufficiency of logical remainders ([Online Appendix Tables A6 and A7](#)). This approach strikes a balance between parsimony of results while avoiding implausible or untenable counterfactual assumptions ([Oana et al. 2021](#)). Finally, robustness tests ([Oana et al. 2021](#)) confirm the result’s high case-oriented and fit-oriented robustness (Box A1, [Online Appendix Table A4](#)).

These tests strengthen our confidence in the representativeness, generalizability, and robustness of the reported results.

Results

Of the 19 lecturers, about half have complied with Prevent Duty in a real-life case ([Online Appendix Table A4](#)), among them I21:

we were looking at ‘stop and search’, police discretion and race (...) a few students had said “police discretion needs to be used because of potential Muslim Islamist threats” (...) I felt that this needed a referral to ‘prevent’ more for Islamic hate, right-wing views – (...) I just felt me being a Muslim teacher in the class at that time was really difficult.

Equally often, lecturers decided to deviate from the Prevent Duty rules. Lecturer I2, whose student had previously experienced problems with the police, told us:

the student did begin to explore faith a little bit more. (...) watching videos online around some of the more weird and wonderful aspects of life, you know like finding giants in the Red Sea that proved that the Quran was right, that, you know, certain Hadeed around female genital mutilation were correct [and] FGM should be applied to women. (...) [I took] two actions, but they probably don’t sit within the university

guidance. (...) I spoke to my partner about it. (...) Then, a (...) colleague (...) [who] happened to be of Muslim heritage. And I just spoke to them over lunch about it.

Regarding training and rule reference, the interviewees mirror the underlying population of UK-based social science lecturers (Thomann et al., 2023; see section “robustness and external validity”). About 58% of the intermediaries report having received Prevent Duty training and being aware of its contents. For example, one lecturer says (I8):

it's something I was quite aware of yeah. (...) I've been involved in evaluations, of prevent training in schools.

Conversely, 42% of interviewees report not having received Prevent Duty training, such as I21:

I feel if I've been in the university for four years and I haven't received that training.

Only 37% refer strongly to rule pressure. I27, for instance, embraces Prevent Duty as part of their job:

Prevent is a relatively small part of safeguarding, (...) it's not the biggest part of my job, (...) but it is an important and I think mainstream part.

Conversely, I1 expresses weak reference to rule pressure:

anything that I might do could have reverberations that I wouldn't really be able to control. So it's quite a high threshold for me for engaging something (...), when I feel like I could make my own judgements rather than expose somebody to a bureaucratic process that could end up anywhere for them.

Conflicting accountabilities between their roles as professionals, mentors, or democratic citizens are experienced by between 63% and 74% of the interviewed intermediaries, which is between 10% and 20% more than the population of Social Science lecturers (Thomann et al., 2023). This may owe itself partly to selection effects and partly to the experience itself.

Examples of rule-professional conflicts abound, as with I35:

that is not compatible with education. (...) the university cares more about its reputation than it cares about (...) foster[ing] a generation of thinkers who can make more of a contribution to this world (...) it's compatible with the university's desire for me to cover their arses (...). Is it compatible with what I want to do? (...) of course it's not.

Similarly, I13 reports a rule-societal dilemma:

the instinct is that you're reporting someone (...) it feels like you would be getting them into trouble. So it does feel uncomfortable as a policy and as a mechanism.

Finally, I31 is a case of a rule-political dilemma:

I struggle with some of the things that are coming from the government (...) much of what we're doing at the moment is around gender equality, around decolonialising the curriculum (...) it feels so counter to those kind of things we're doing as an institution and a department to then be kind of othering certain people.

Understanding intermediary (non-)compliance

Truth [Online Appendix Table A5](#) lists the empirically observed configurations of conditions. [Table 4](#) displays the necessary conditions for intermediary (non-)compliance.

As expected, the interviewed lecturers only comply with the Prevent Duty policy (COMP) when there are neither cognitive nor information barriers that increase the costs of compliance (Weaver, 2014): lecturers are either well-trained (absence of information barriers) or do not display one of the three

Table 4. Necessary conditions for (non-)compliance.

	Consistency	Relevance of Necessity RoN	Coverage
Outcome: compliance (COMP)			
TRAIN + ~DPROF	1	0,7	0.75
TRAIN + ~DSOC	1	0,6	0.69
TRAIN + ~DPOL	1	0,6	0.69
Outcome: non-compliance (~COMP)			
DPROF + DPOL	1	0,56	0.71

Note: read + as "OR", ~ as "NOT".

Thresholds: consistency 1, coverage, and Relevance of Necessity 0.5.

Table 5. Sufficient conditions for compliance (COMP).

	Consistency	PRI	Coverage	Unique coverage	Cases
Well-trained unconflicted					
TRAIN*~DPROF*~DPOL	1.0	1.0	0.444	0.222	15; 13; 27; 17
TRAIN*~DSOC	1.0	1.0	0.333	0.111	15; 8; 27
Conflict-free					
~DPROF*~DSOC*~DPOL	1.0	1.0	0.333	0.111	3; 15; 27
Compliance trumps politics					
TRAIN*RULE*DPOL	1.0	1.0	0.222	0.222	21; 16
Solution	1.0	1.0	0.889		

Note: read * as "AND", ~ as "NOT".

Thresholds: Consistency 1, frequency 1.

Italics: case has membership in more than one path.

accountability dilemmas (absence of cognitive barriers). Illustrating this, I27 is a well-trained lecturer who does not experience accountability dilemmas:

I've actually had quite a lot of Prevent training (...) I was quite familiar with the Prevent Duty. (...) there was a lot of concern amongst lecturers and teaching staff, but I think in reality it is very, very light touch (...) I had a student came to me to disclose that he had taken a gun to another university. (...) He was a retired soldier. (...) I had to disclose that (...) there was a potential risk and somebody with a bit more knowledge, access to resources (...) could make contact with people who were giving him support or treatment or somebody who could do an assessment (...) the guy with the gun was suspended.

Conversely, non-compliance occurred only when lecturers experienced either a rule-professional or a rule-political accountability dilemma. Thus, accountability relations prove crucial for making regulatory intermediation work "on the ground."

We now analyze the conditions under which lecturers chose to (not) comply with Prevent Duty. Table 5 reveals four accountability configurations that were related to compliance with the Prevent Duty policy.

The "well-trained unconflicted" lecturers

In path 1, we have four lecturers who are well-trained (TRAIN) and who perceive the regulation to clash with neither professional norms nor political-ideological principles (~DPROF*~DPOL). In path 2, we partly see the same well-trained lecturers, who do not perceive a conflict with student needs (~DSOC). One lecturer (I17) was alerted to a student harboring radical right-wing views and engaging in inappropriate online activity by fellow students. They decided to report the student via Prevent, where the case got referred to Channel (COMP). They were

extremely aware. My university was very quick to make all staff do compulsory training courses [TRAIN] (...) I don't see [Prevent Duty] as changing my relationship with students, which is mostly based on trust (...) I know a fair number of (...) intelligence or security specialists (...) and I've always felt quite comfortable with (...) their understanding of these kinds of threats. And I see them as more and more present

[~DPOL]. I felt it made me actually more protected. (...) I just see it as a natural evolution of safeguarding or being professional [~DPROF] (...) it is necessary and (...) not an additional burden. I don't see it as changing my personal relationship with students, which is mostly based on trust and being authentic and giving a damn [~DSOC]. (...) He ticked an awful lot of boxes (...) so I reported that one. But I don't have any qualms. I'm just doing this because I'm fairly confident that's it's a problem [COMP].

Thus, the lecturer made an informed decision reflecting the absence of cognitive and information barriers to compliance discussed earlier.

The “conflict-free” lecturers

The complete absence of accountability dilemmas coincided with compliance (~DPROF*~DSOC*~DPOL). One lecturer, who knew Prevent Duty well (I3), reported an external, prospective student based on their informal request for supervision of a thesis on Islamic law because of:

the incongruity of asking me to be a PhD supervisor specifically when I didn't have any expertise in Islamic Law and the association between the International Islamic University and the attached mosque (...) [which] was closed down by the Pakistani security forces in 2015 for their associations with the TT (...) it didn't feel quite right to me (...) the fact that the mosque attached to the university, I just thought to be on the safe side (...) I received two sets of emails and I referred both of them to our academic registrar under the Prevent Duty [COMP] (...) how different is it to the duty I carry out every day as a citizen? [~DSOC]. (...) it's thankfully not my duty to say who can speak and who can't speak. And I think we don't have a no platform policy [~DPOL] (...) So has Prevent Duty changed the way that I go about my working life? No, it hasn't. [~DPROF] I like to think that I'm fairly balanced (...) we have the conversations around the dinner table (...): “ why do people make it such a big deal anti-discrimination, just don't be a dick”. And it's the kind approach that I take (...) when things don't feel right, then you've got a duty to make sure that those around you in the community, in the wider society are safe. Simple as, don't be a dick.

Because they are not conflicted about Prevent Duty, this lecturer perceived the decision to report as simple and guided by an intuitive concern about safety.

Compliance trumps politics

Two lecturers had received training on it (TRAIN) and found it was important to implement this policy (RULE), while also finding it problematic as it conflicted with their own political–ideological values (DPOL)—but they put the will of the regulator first. One lecturer reported an undergraduate student who was undertaking a problematic research topic (I16):

all he wanted to do was go to the library and look up some edgy Islamist writings (...) for his own excitement. (...) I was not only trained in [Prevent Duty], I sat on the panel that decided the strategy for the actual faculty implementation [TRAIN]. (...) whether I want to or not, it's my job (...) And it's always in my mind (...) it's a programme that is binding on students and on staff (...) you have to be careful about what the rules are and follow them. But you can also go through the process of understanding why they're there. It's a risk-based strategy [RULE] (...) but the way that it's put together is fundamentally broken. (...) It's extremely racialized and it's against Muslims [DPOL]. (...) but you still have to do your best with it. (...) I thought it was unavoidable to notify the department and the university because of the things that he was going to be researching in the library [COMP].

This lecturer decided to report the student despite strong concerns about the policy, based on their knowledge about the purpose of Prevent Duty and their sense of obligation to comply.

To summarize, as expected (expression 1), training and the absence of accountability dilemmas are important for intermediary compliance, especially in combination with each other. Strong rule reference can indeed make up for an accountability dilemma when lecturers understand the underlying purpose and strategy of the regulation, which training facilitates.

Table 6 displays the factors that coincided with non-compliance.

Table 6. Sufficient conditions for non-compliance.

	Consistency	PRI	Coverage	Unique coverage	Cases
Untrained, politicized professionals					
~TRAIN*DPROF*DPOL	1.0	1.0	0.600	0.600	1, 7, 18, 35; 31; 29
Apolitical, conflicted educators and mentors					
DPROF*DSOC*~DPOL	1.0	1.0	0.200	0.200	6; 34
Politicized non-complier					
~RULE*~DPROF*DSOC*DPOL	1.0	1.0	0.100	0.100	9
Solution	1.0	1.0	0.900		

Note: read * as "AND", ~ as "NOT".

Thresholds: Consistency 1, frequency 1.

The “untrained, politicized professionals”

Lack of knowledge of the regulation, along with simultaneous accountability dilemmas, often coincided with intermediary non-compliance. Six lecturers were not trained on the Prevent Duty policy (~TRAIN) and found it problematic due to both their professional values and their political-ideological convictions (DPROF*DPOL). These lecturers struggle with being “responsibilized” and the sometimes very personal value conflicts that Prevent Duty causes them. They prefer a more informal approach to reporting. One lecturer (I29) had a student who did an in-class presentation containing swastikas—a clear red flag that needs reporting under the Prevent Duty:

they've made it compulsory now that we have to do Prevent Duty training, and I haven't actually done it yet. (...) I'd prefer to be taught (...) good, solid information about processes of radicalization, the kind of people that are vulnerable to it. I'd like to know what exact signs I would be looking for [~TRAIN]. (...) I'm a professional person who has got to adhere to a code of conduct (...) but I have a real problem with the liability (...) universities just do this online training and then you're responsible for something (...) I don't think it's fair of us to be the gatekeepers of whether people are going to end up doing something awful or not [DPROF] (...) it's so controversial and fraught with problems (...) as an Asian person (...) I know sometimes how people can see things that aren't really there and they don't get it right. (...) But if you don't know enough about what radicalization is (...) I just think we don't know enough. (...) And it actually makes me feel really quite uncomfortable and disconcerted and a wee bit scared as well. [DPOL] (...) But this particular behavior seemed very deliberate, and it wasn't done with any kind of humour. It didn't seem to be done with naivety. (...) we kind of thought, nah, this is not totally innocent. There's something a wee bit sinister and inappropriate behind it. And it really needs to be tackled and then he needs to find out that that's inappropriate. (...) the student was interviewed confidentially and was asked to explain why they'd done that [~COMP] I can see that I'm in a dilemma with the with Prevent thing, because obviously, if you had real red flags that somebody might be a threat, then you would want to raise that as an issue. (...) if you pass on information about somebody, I bet you that you will never find out what's done with it or what the outcome is.

This lecturer emphasizes that they do not have enough information about Prevent Duty and what would happen to this student to put aside their serious, partly emotional concerns about the policy.

The “apolitical, conflicted educators and mentors”

Two lecturers do not comply with Prevent Duty primarily on the grounds of a general rule-professional and rule-societal accountability dilemma (DPROF*DSOC), while not explicitly objecting to it politically (~DPOL). One lecturer (I34) describes one student's behavior that constitutes a criminal offence—a case that unambiguously needs reporting under Prevent Duty (2015):

nice young lad, Californian, rocks up in my office and says, 'I want to write about radicalization of English foreign terrorist fighters. So, I've been watching all these Islamic jihadi recruitment videos of beheadings and things' (...) I didn't have any concerns about him being drawn into terrorism. Maybe I should have done, but (...) we didn't do it through Prevent Duty. We did it simply by talking to the relevant people (...) That's all got a little bit trickier because there's a provision under the 2019 Counter-Terrorism Border

Security Act (...) which says that viewing material likely to be of use to somebody planning or preparing a terrorist act or terrorist related act (...) online on a single occasion is a criminal offence carrying a maximum 15 year prison sentence (...) police investigation is not something you want to invite [~COMP] (...) I don't want to do anything that would take me outside the law. (...) We are protected by statutory freedoms under the Education Act (...) which have greater legal force than does Prevent Duty. So, we shouldn't be cowardly about this. (...) the core duties of the university is to enable free interchange, exploration of ideas (...) I think there is a really big tension [DPROF]. (...) one of the things that really concerns me is (...) that the Prevent Duty has the effect of turning students into suspects (...) it really is not conducive to good academic relations and it's incredibly corrosive of trust [DSOC] (...) I don't think that Prevent is a proportionate response.

This lecturer is very well-informed about terrorism, radicalization, and the legal context within which universities operate. Their concerns about Prevent Duty are of a very principled nature, leading them to dismiss reporting the student as disproportionate despite being aware of its illegality.

The “politicized non-complier”

One non-compliant lecturer finds complying with the Prevent Duty policy unimportant (~RULE) and experiences a rule-societal and a rule-political accountability dilemma (DSOC*DPOL), without principally struggling with Prevent Duty as a professional (~DPROF). This lecturer (I9) describes an encounter with a female Muslim student who was under pressure from her family to enter a forced marriage:

when she talked about the family, their views, it seemed to me potentially that we were edging into prevent territory (...) the university Emaan (...) didn't turn out to be very helpful because he was very traditional and basically told her to do whatever her male relatives said (...) I was able to get her the contact details of another woman who (...) could talk to her about the issues. I did what I could, but honestly, I was just feeling my way in the dark [~COMP] (...) In principle, I am absolutely fine if I think about what the Prevent strategy wants me to identify, which is the risk of people who might be going to harm others [~DPROF] (...) I am not sort of a policy chaser (...) I'm far more interested in my own experiences of people, my professional judgement (...) I don't think the Prevent strategy gives me the additional information or insights that would let me do that any better [~RULE]. (...) as we have seen, it clearly hasn't [prevented terrorism] (...) simply making things more formally monitored isn't the way [DSOC] (...) it's been a very flawed policy. Right from the outset. (...) it was a knee jerk, populist response to catch up a very certain sector of the electorate (...) my issue with Prevent is that if I looked at it through the eyes of my two third Muslim student population, I feel their outrage. And so, yeah, that does shape how I view it [DPOL].

Despite expressing safeguarding concerns, this lecturer is so politicized about Prevent Duty that they prefer making their own efforts to “help” this student over complying.

Corroborating our theoretical expectation (expression 2), the presence of accountability dilemmas can trigger intermediary non-compliance, reinforced by either a lack of awareness and training or a dismissive attitude toward rule adherence.

The above quotations illustrate how many interviewed lecturers informally performed their own risk assessment. This intuitive risk assessment was often decisive for the lecturers' reporting behavior, including in the two unexplained cases (I2 and I11), where the lecturers classified the student as harmless. Influenced by situational and personal factors, this assessment is highly subjective and may not reflect the actual gravity of the case. For example, the above-cited lecturer (I3) perceived an external e-mail request for PhD supervision as more threatening than undergraduate students' expression of extremist views, which is explicitly covered by Prevent:

yeah, I can be wrong (...) But in assessing risk, you've got to listen to those feelings of when things don't feel quite right (...) I've had students in the past that have displayed kind of extreme right-wing views, and I haven't gone down the Prevent route because I did not deem it to be a risk. But with this particular e-mail, this potential student, I just thought it was worth checking out.

Thus, in a context of mandated, interpretive intermediation, intermediaries with an informational advantage may influence the form of regulation, become the de facto leader in regulation, and informally

interpret rules to make them more amenable (Abbott et al., 2017, p. 29). Thereby, the intermediaries unofficially appropriated the regulator's role (Brès et al., 2019, p. 130; Kourula et al., 2019, p. 142)

Discussion

Regulatory intermediation theory (Abbott et al., 2017) advances the study of regulatory governance by bringing to the forefront the multiple regulatory and social relations and roles that characterize hybrid regulatory regimes like Prevent Duty, where social actors are "responsibilized" with ensuring regulatory goals (Havinga & Verbruggen, 2017; Shamir, 2008; Tobin et al., 2023; Whiting et al., 2021).

This article has illustrated how the *accountability regimes framework* allows RIT scholars to move beyond description to understand how and why competing accountability relations shape intermediaries' compliance (Hupe & Hill, 2007; Hupe & van der Krogt, 2013; Thomann et al., 2018, 2023). A formal set-theoretic theory evaluation (for details, see Online Appendix Table A10) shows that our results fully support the ARF's core claims: the presence of multiple accountability dilemmas can trigger non-compliance, while their absence can trigger compliance (Thomann et al., 2023). However, intermediaries' prioritization of formal rules can mediate the role of accountability dilemmas. Moreover, institutions can mitigate intermediary non-compliance by providing training to intermediaries that improves their understanding, awareness, and acceptance of the regulation (Abbott et al., 2017; Weaver, 2014). Training is part of the story behind intermediary compliance and was only irrelevant when intermediaries experienced no accountability dilemmas at all. Findings also suggest that a lack of training can contribute to non-compliance of politicized professionals. The theory evaluation shows that the cases are perfectly in line with our theoretical expectations, even those two cases that are not covered by the solution. Thus, the ARF has proven useful to understand compliance by individuals acting as intermediaries in the present study, as well as in previous research by Thomann et al. (2018, 2023).

Several scope statements apply. First, cases of mandatory, interpretive intermediation under conditions of high ambiguity and politicization have an enhanced likelihood of non-compliance. Second, the multitude of different actors' relations with contrasting logics we observe is typical of hybrid regulatory regimes and enhances the likelihood of accountability dilemmas. Possibly, in less ambiguous and less politicized regulatory settings, informal accountability relations and dilemmas may play a less prominent role in explaining intermediaries' compliance. Future research should expand the ARF's scope to study organizations or networks acting as intermediaries (Kourula et al., 2019), beyond scenarios of interpretive intermediation (Brès et al., 2019), and use larger samples drawn from different populations of intermediaries to probe the robustness of our results and yield more parsimonious and generalizable theoretical insights. Our observational study's empirics do not allow for causal inferences beyond the "smoking gun" evidence presented.

Conclusions

Ciornei et al. (2023, p. 1076) have pointed out that "the implementation of policies with high potential for goal incongruence between intermediaries and regulators will likely give rise to strategies of adaptation and resistance". The present study illustrates how intermediary compliance is crucially a matter of accountability (Huising & Silbey, 2021).

The ARF provides RIT with a hitherto lacking theoretical basis to explain intermediaries' compliance, based on three core insights. First, the inherently relational status of regulatory intermediaries is understood as a problem of multiple, objective or subjective, formal and informal accountability relations, which result from intermediaries' social and institutional embeddedness (Aleksovska et al., 2019; Bovens et al., 2014; May, 2005; Overman & Schillemans, 2022). Second, the accountability perspective models how intermediaries may have to juggle competing roles, regulatory goals, and actor interests, which manifest as accountability dilemmas, that is, competing expectations and accountability pressures coming from their different audiences (Aleksovska & Schillemans 2021; Euchner, 2022). Third, the ARF uses insights from accountability and role identity theory to predict how intermediaries will solve such tensions. It posits that intermediaries will choose courses of action that are more likely to be supported by those audiences whose approval they subjectively consider important, and that are consistent with their personal values and beliefs (Hwang & Han, 2017; Webeck & Lee, 2022).

The ARF makes three distinct contributions to theories of regulatory governance (Thomann & Lieberherr, 2024). First, unlike the still predominant principal-agent perspective, the ARF's relational

perspective on the human, individual side of accountability recognizes the importance of both formal and informal accountability relations (Lægread & Rykkja, 2021). Second, beyond felt accountability approaches, the ARF models how informal, subjective accountabilities behave relative to formal accountability relations (Schillemans et al., 2021). Third, the ARF goes beyond behavioral approaches by systematically modeling how different levels of macro and meso-level contexts play out as accountability pressures at the individual level (Aleksowska et al., 2019). Like Ciornei et al. (2023), the ARF recognizes the importance of policy ambiguity and the interdependence between the intermediary and regulator. Yet, the ARF also accounts for other horizontal accountability relations of intermediaries.

Beyond this academic contribution, the results have implications for regulatory design. First, Prevent Duty explicitly requires intermediaries not to perform their own risk assessment—given the complexity and sensitivity of the risks. Yet, the regulator also does not provide intermediaries with clear enough criteria for reporting students, given the inherent ambiguity of phenomena like “radicalization.” This ambiguity leads lecturers to perform their own risk assessment. This suggests that mandatory reporting duties for intermediaries in a setting of high ambiguity and high politicization come with an in-built risk of non-compliance and may best be avoided. Second, delegating regulatory tasks to intermediaries may prove less effective than intended when the hybrid setting comes with a high risk of accountability dilemmas. The decision to involve intermediaries should be based on a systematic ex ante assessment of the relevant accountability regimes and potential conflicts with rule pressure. The ARF provides practitioners with an intuitive, flexible, and systematic tool for regulatory analysis. Third, results highlight the core motivating role played by training and educating intermediaries about the regulations they help deliver in overcoming cognitive and information barriers to compliance.

Our results illustrate how, in a context of interpretive intermediation, politicized, mandated regulatory intermediaries as rule-takers may not comply when they prioritize other social or regulatory roles, and that the politicized intermediaries informally and unofficially can appropriate the regulator’s role of risk assessment (Brès et al., 2019; Kourula et al., 2019). As a result, Prevent Duty’s hybrid intermediation set-up neither works as intended—since intermediaries instead of reporting engage in non-compliance and informal risk assessment; nor works in a way that many intermediaries themselves perceive to be legitimate or effective, as numerous statements about Prevent Duty’s shortcomings suggest (Gayle, 2019; Lewis, 2018; Sedwick, 2010; Thomann et al., 2023; Whiting et al., 2021). As others have stressed before us, these results should raise “normative questions about the appropriateness of empowering private intermediaries” (Euchner, 2022, p. 851) when it “responsibilizes” them on sensitive, politically contested issues like radicalization. The ARF reminds us that these are political questions closely linked to socially constructed notions of accountability and legitimate authority. In regulatory intermediation, “power [is] the capacity to influence regulation, whereas legitimate authority is the socially accepted capacity to do so” (Brès et al., 2019, p. 130). The Prevent Duty case highlights how a tension between power and legitimate authority in regulatory intermediation may trigger problems of non-compliance that can interfere with the very purpose of regulation.

Supplementary material

Supplementary material is available at *Policy and Society* online.

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Conflict of interest

None declared.

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