PREVENT POLICY

1. INTRODUCTION

Athena Global Education (AGE) is required to function under the UAE Federal Decree-law No. (20) of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Financing of Illegal Organisations. As per this law, any person, having the knowledge that funds are the proceeds of a felony or a misdemeanour, and who willfully commits any of the acts defined in this law, shall be considered a perpetrator of the crime of Money Laundering.

Athena Global Education (AGE) will also be required to function under UAE Federal Law No. 7 of 2014 on Combating Terrorism Offences. This law shall apply to the offences set forth thereon and to the felonies and misdemeanours set forth in any other law should they be committed for a terrorist purpose.

Terrorist groups who pose a threat seek to radicalise and recruit people to their cause. Therefore, early intervention is at the heart of Prevent which aims to divert people away from being drawn into terrorist activity.

2. PURPOSE

- ensure an awareness of "Prevent" within the College;

- provide a clear framework to structure and inform our response to potential radicalisation, including a supportive referral process for those who may be susceptible to the messages of extremism.

3. SCOPE

The Prevent Policy applies to all staff and (where relevant) students of Athena Global Education (AGE). It places responsibilities on College staff; learners; and volunteers; contractors; visitors; and those working under self-employed arrangements.

4. PRINCIPLES

The College accepts its legal responsibility to have due regard to the need to prevent people from being drawn into terrorism. In accepting this responsibility, it must also balance detailed Prevent requirements against its core mission to ensure that certain fundamental standards, vital to a

thriving academic community, are preserved. This balance is achieved by ensuring that any changes to operational polices, guidelines, processes, systems or working practices, implemented to ensure Prevent compliance, align with the one or more of the following core Prevent principles:

1. **Safeguarding**. Preventing vulnerable individuals from being drawn into terrorism is a safeguarding issue, and College policies and procedures in place are required to help safeguard staff and students, who should take into account the Prevent requirements.

2. **Staff awareness.** Staff should be made aware of the general requirements of Prevent but in ways that ensure they remain sensitive to the cultural, religious and ethnic diversity of the college community.

3. **Senior accountability.** Senior College managers will maintain a risk register and will monitor the institutional risk of College members being drawn into terrorism. A designated senior member of staff will be assigned lead responsibility in this policy for all Prevent related policies and measures.

4. **Celebrating diversity.** The culturally diverse nature of the College must be actively celebrated and promoted to counter the threat of radicalisation from external influences.

5. **Multi-faith.** The provision of adequate facilities to allow groups to observe their faith, are essential to harmonious community relations and inter-faith dialogue, so are an important element of the College's Prevent approach.

6. **Information sharing.** Some internal and external information sharing will be necessary but only under appropriately controlled conditions. This does not amount to an agreement to share personal data on anything other than a need based and case by case basis.

7. **Academic freedom.** The ability of students and staff to research, teach and debate any topic will not normally be fettered unless, on a case by case basis, a specific threat is identified, or a clear Prevent requirement exists.

8. **Free speech.** Policies and procedures relating to the management of events, speakers and the display of posters and other promotional material must balance the obligation to enable free speech with the requirements of Prevent.

9. **Social media.** Social media, whilst ostensibly just another medium for communication, social interaction and debate, requires specific guidance and monitoring consistent with

the College's free speech obligations. Social media is a vehicle by which vulnerable individuals are particularly susceptible to radicalisation.

10. **Website Filtering.** The College will block access to specific websites, network resources and IP addresses that provide or facilitate access to extremism materials in relation to the College's Prevent duty. Staff and students wishing to view material on external websites whose access has been disabled by targeted filtering should refer to the Prevent Policy.

5. THE POLICY

5.1 Approach

The College welcomes a rationale intention that the Prevent Duty is implemented in a proportionate and risk-based way, and that it should not create large new burdens on institutions. We therefore intend to implement our legal responsibilities as part of our existing policies and procedures, which we also consider to be the best way of ensuring a joined-up approach. In doing this we will actively involve the Students and will continue to consult them should any changes to this policy be required in the future.

If a student or lecturer identifies an issue of concern, they should approach their tutor or line manager respectively. If the issue involves one of these people, they should approach a member of the senior management team. All conversations will be in the strictest confidence.

5.2 Leadership

The College takes seriously at the highest levels the need to prevent terrorism occurring in our community. Our approach has been approved by the Board of Directors, following consideration in the Academic Council, who have approved the Policy. The Student Welfare Manager has been identified as the member of management responsible for ensuring that the College complies appropriately with the Prevent Duty, in liaison with the other key stakeholders within and beyond the College.

5.3 Risk Assessment and Action Plan

As required by the Prevent Duty, we have carried out an assessment of the risk of our students being drawn into terrorism. This risk assessment will be reviewed at least annually by the Academic Council. Where any significant risk is identified we will consider what action might mitigate the impact/ likelihood of that risk crystallizing, and if necessary, include it in the College's Prevent Action Plan.

5.4 External Speakers

We will ensure that we meet the different legal requirements on us, as specified by the UAE's Ministry of Education (MOE) and the UAE Federal Laws, to secure freedom of speech within the applicable laws. Under the Prevent Policy, where the views expressed constitute views that risk drawing people into terrorism, or are shared by terrorist groups, permission must be sought by the staff or student organisers from the College Student Welfare Officer. Due diligence is carried out where required and we will share information with other institutions if appropriate about any particularly problematic event that comes within the remit of Prevent.

In complying with the Prevent Duty the College will not:

- provide a platform for any proscribed terrorist organisation or encourage terrorism in any way;

- allow gender segregation at any event it organises.

5.5 Staff Training

We will carry out training on a regular basis for all relevant staff so that they can recognise those who are vulnerable of being drawn into terrorism and potential signs of radicalisation. This training will be carried out after consultation with our Student Counsellors. It will include an explanation of how to handle appropriately and sensitively any concern that may emerge. For those with whom any specific concerns will be raised (primarily staff in Student Services), differentiating the risk of radicalisation from other issues will be covered in more detail, together with the opportunities and requirement to share information confidentially where needed. Our approach will be to support vulnerable students in whatever circumstance they find themselves, recognising that radicalisation could occasionally be occurring when certain behaviour is manifest, but sometimes other explanations may usually apply.

5.6 Faith Facilities

The College seeks to ensure that appropriate provision is made for those of any faith (or those without faith) to access appropriate facilities for pastoral care and for religious purposes. We provide a prayer room each for both genders. The College ensures that the Prayer Room is only used for praying purposes and not for any discussions or endorsements.

5.7 IT Networks

We consider it unacceptable for our IT networks to be used in any way that supports, promotes or facilitates terrorism. We have referenced Prevent in our relevant IT policies and will keep

under regular review the possible use of filters as a means of restricting access to content covered by the Prevent Duty, as part of our risk assessment process and in discussion with other universities/ colleges. Social media services such as Facebook, Twitter and Reddit provide new avenues for the distribution and accessing of extremist material, and the College takes the challenges presented by social media very seriously. If any misuse of the College's branding on social media accounts is discovered, then action will be taken in accordance with the terms and conditions of the relevant platform.

5.8 Communications

We will not permit material supporting terrorism to be displayed within College premises, or on our online platforms, and will remove any such material if it is found. Likewise, we will seek to ensure that the College's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism, and will investigate immediately if any such instances are raised. It is acknowledged that there will be legitimate reasons to display materials relating to terrorism as part of legitimate teaching activities.

5.9 Roles and Responsibilities

All members of staff should be aware of the College's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the College community who are concerned about a student who might be at risk of being drawn into terrorism should report this to their Line Manager or the Academic Head. Concerns about members of staff who might be at risk of being drawn into terrorism should be reported to the Operations Head.

5.10 Teaching and Learning

To provide a curriculum that promotes appropriate values, knowledge, skills and understanding; to build the resilience of learners by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- embedding values, equality, diversity and inclusion, wellbeing and community cohesion throughout the curriculum;

- promoting wider skills development such as social and emotional aspects of learning;

- a curriculum adapted to challenge extremist narratives and promote universal rights;

- teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis.

6. RELEVANT ASPECTS OF THE (REVISED) UK QUALITY CODE

6.1 Expectations for Standards: Core Practices

The provider uses external expertise, assessment and classification processes that are reliable, fair and transparent.

6.2 Expectations for Quality: Core Practices

The provider actively engages students, individually and collectively, in the quality of their educational experience.

6.3 Common Practices

The provider reviews its core practices for quality regularly and uses the outcomes to drive improvement and enhancement.