

AIMS COLLEGE OF BUSINESS AND IT
(PVT) LTD

PREVENT POLICY



1. Introduction

The Office for Students (OfS) monitors what higher education institutions are doing to keep people from being involved in terrorism. To complement the policy, the government produced sets of legislative guidelines.

To fulfill its Prevent obligation, AIMS must:

- have effective welfare support systems, linking to DFE Prevent coordinators, local authorities, or the police if necessary
- have systems for assessing and mitigating risks around external speakers and events on campus, while maintaining the existing duty to promote freedom of expression
- arrange ongoing Prevent training for relevant staff
- have an IT usage policy, and where appropriate a research policy

2 Scope

This Prevent Policy outlines how AIMS fulfills its Prevent responsibilities under the prevention of Terrorism Act no 48 of 1979 (10 of 1982; 22 of 1988) In compliance with the Act's responsibility and the Revised Prevent duty guidance for AIMS. AIMS conducts a Prevent Risk Assessment yearly or as needed and revises its Prevent Action Plan as needed. This policy is divided into three sections:

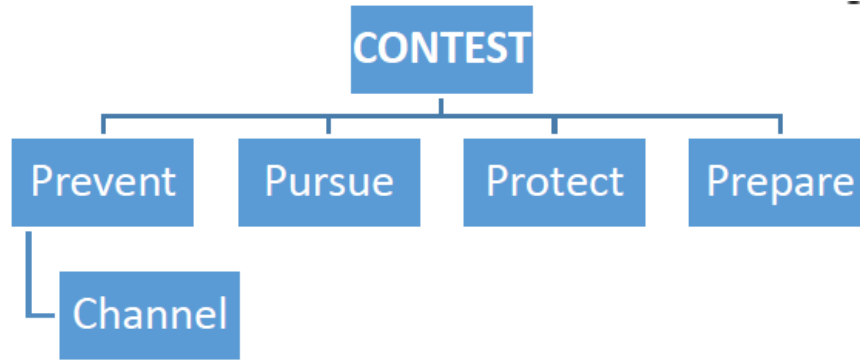
Part 1: Legal Setting

Part 2: Putting the Prevent Duty into Action on Campus

Part 3: How to Report a Prevent Duty Concern on Campus

Part 1: Legal Setting

The Prevent strategy is part of CONTEST, the national counter-terrorism strategy, and attempts to lessen the threat of terrorism to Sri Lanka by preventing people from becoming terrorists or from supporting terrorism:



The Prevent strategy:

- Responds to the ideological challenge of terrorism and the threat posed by those who promote it;
- prevents people from becoming involved in terrorism and ensures that they receive appropriate advice and support; and
- Collaborates with sectors and institutions where there are risks of radicalization that must be addressed.

3 Channel Programme and Referrals

2.1 The Channel program is an important component of the Prevent approach. The initiative focuses on giving early intervention to persons who have been recognized as being at risk of being lured into terrorism. It employs a multi-agency approach lead by the local government to safeguard vulnerable people by:

- a) Identifying persons at risk;
- b) Analyzing the nature and scope of that risk; and
- c) Devising the most suitable assistance plan for the individuals involved.

2.2 At a Channel Panel Meeting, the appropriate local authority and relevant partners review channel referrals. A Channel Panel strives to protect vulnerable people while also encouraging healthy community cohesiveness.

AIMS oversees Channel Panel as necessary.

5. At AIMS, balancing the Prevent responsibility with other legal obligations and responsibilities

In carrying out the Prevent responsibility, AIMS considers related legal obligations and responsibilities. The Prevent duty requirements are weighed against the following legal obligations and responsibilities:

Education

Ordinance Nos,

- 31 of 1939
- 61 of 1939
- 12 of 1945
- 3 of 1946
- 26 of 1947

Act Nos,

- 5 of 1951
- 43 of 1953

Human Rights Commission of Sri Lanka Act No. 21 of 1996

Personal Data Protection Act, No. 9 of 2022

Right to Information Act, No. 12 of 2016

Public Security

Ordinance Nos,

- 25 of 1947

Law Nos,

- 6 of 1978

Act Nos,

- 22 of 1949
- 34 of 1953
- 8 of 1959

Gender Equality Act, No. Of 2023 working draft

Safety and Health Act, No. 38 OF 2009

Where applicable, AIMS Prevent Policy should be reviewed with the following AIMS policies:

- a) Safeguarding Children and Vulnerable Groups
- b) Fitness to study (under development)
- c) Dignity at Study Policy (under development)
- d) Dignity at Work Policy (under development)
- e) Code of Practice to Ensure Freedom of Speech and Freedom of Expression
- f) AIMS Data Protection Policy
- g) AIMS Freedom of Information (FOI) Policy (under development)
- h) AIMS Equality and Diversity Strategy and Policy
- i) AIMS Complaint Procedure
- j) Health & Safety at AIMS

5 Governance

5.1 The Prevent Duty is overseen by AIMS's Board of Management. The obligation for carrying out the job was transferred to AIMS's Board of Management by the Executive Board.

5.2 AIMS Audit and Risk Subcommittee, led by the committee chair, is in charge of overseeing the execution and revision of AIMS's Prevent Action Plan, as well as the Prevent Risk Assessment.

5.3 In addition, AIMS Audit and Risk committee chair is responsible for analyzing and mitigating any Prevent-related risks annually.

6. Monitoring and Review

The Prevent Policy and associated documents are subject to periodic update and review when required. AIMS produces its Prevent Annual Report yearly and as required, the report is submitted to Office for Students for auditing following approval by the Board of Management.

6.2 Please contact the AIMS Audit and Risk Committee Chair at arc@aimscollege.edu.lk for queries about this policy and the associated documents.

Part 2: Implementing the Prevent duty on Campus

1. Action Plan for Prevention

1.1 The Prevent Action Plan is a public document that outlines a sequence of activities that AIMS intends to carry out in order to fulfill its Prevent commitment. Every year, the Action Plan is reviewed and modified.

1.2 A copy of the AIMS's Prevent Action Plan may be obtained by contacting the AIMS Audit and Risk Committee Chair at arc@aimscollege.edu.lk .

2. Information sharing (Prevent)

External Information Sharing

2.1 To comply with the Prevent responsibility, AIMS has a Prevent Information Sharing Agreement with designated external partners.

2.2 The goal of the Information Sharing Agreement is to guarantee that personal information is shared lawfully, as required by the Terrorism Act no 48 of 1979 (10 of 1982; 22 of 1988) and the Personal Data Protection Act, No. 9 of 2022.

2.3 Only AIMS Audit and Risk Committee Chair may disclose personal data with the stakeholders in order to fulfill the Prevent responsibility.

Copies of the EXTERNAL INFORMATION SHARING AGREEMENT are available upon request.

Internal Information Sharing

2.4 Personal data should be disclosed among Departments/Faculties at AIMS only for valid business reasons and/or when a student or staff member is putting himself or others in danger. In order to comply with the Prevent obligation and the Data Protection requirements, AIMS has established an Internal Information Sharing Protocol for Prevent-related concerns.

Copies of the EXTERNAL INFORMATION SHARING AGREEMENT are available upon request

3. Information Technology and Filtering

3.1 AIMS recognizes faculty and students' right to pursue a wide range of academic activities.

3.2 AIMS Acceptable Computer Use Policy, Network Account Policy, and Electronic Mail Policy (under development) detail the arrangements for using AIMS computer facilities, including filtering arrangements and academic activities that may necessitate online access to sensitive or extremist-related material.

4. External Speakers and Events

4.1 AIMS takes care to preserve its obligation to ensure free expression (within the law) on campus, as well as its provisions to safeguard academic freedom.

4.2 AIMS' policy on free expression clearly defines AIMS and event organizers' (internal or external) obligations when arranging an event on campus or an AIMS -branded event off campus. It also outlines AIMS processes for organizing meetings and other events on campus premises which may be judged problematic by the type of the speakers present or by the viewpoints which would be expected to be stated.

4.3 To foster fair and courteous discourse, AIMS will examine any of the following to reduce any possible harm to AIMS:

- a) appointing an independent chairperson to facilitate an event and ensure a diverse range of viewpoints are heard;
- b) filming events to discourage the use of unlawful speech;
- c) increasing security;
- d) ticketing an event to prevent non-student violent protest;
- e) reviewing any promotional materials prior to the event; or
- f) training staff on how to facilitate well-balanced debate.

4.4. Permission to use AIMS premises for events will be granted only to staff, students, and external customers who agree to follow AIMS instructions regarding the location, arrangements for, and conduct of such activities, including adequate stewarding and entry control. The specifics of such arrangements are worked out in each situation.

4.5 Staff and students who violate or deviate from these rules may be subject to AIMS disciplinary processes. External customers who violate or deviate from these guidelines may be prevented from accessing AIMS facilities.

4.6 Subsidiary groups of AIMS alumni must follow the agreed-upon policy when utilizing AIMS brand for off-site events. Without the agreement of AIMS CEO no events shall be organized off campus under AIMS name if an external speaker is present.

4.7 When utilizing AIMS brand for off-site activities, staff employees must also follow the agreed-upon policy. Prior to publishing, any publicity containing AIMS name must be approved

by AIMS CEO. Without the agreement of AIMS CEO, no events shall be organized off campus under AIMS name if an external speaker is present.

5. Freedom of Speech

5.1. AIMS has protocols in place for meetings and other events that may be regarded contentious due to the nature of the speakers present or the opinions that may be expected to be expressed.

5.2 According to AIMS, a 'controversial' meeting or other activity is one in which there is a genuine chance that the speaker will not be able to enter or leave the premises safely or give a speech adequately unless special preparations are made.

5.3 If there is any dispute regarding whether the Freedom of Expression procedures apply to meetings or other events, organizers should consult AIMS CEO as soon as possible. The CEO is the final arbiter in these cases.

5.4 Appeals against the AIMS CEO's decision may be made to a special committee composed of at least three members of the Executive Committee and one member from the Board of Management. The Ethics and Advisory Committee's recommendation on whether a speaker or event should be authorized on campus may be followed.

5.5 Requests for external speakers must be made no more than three months and no less than ten working days in advance of the meeting. Requests will be accepted from AIMS employees and enrolled students and should be sent to the AIMS CEO or his/her nominee by completing the AIMS Freedom of Speech form.

5.6 All requests for speakers from outside AIMS made by the alumni subsidiary organizations must be submitted to the AIMS alumni. Other students' requests for lecturers from outside AIMS must be sent to the AIMS Executive Board. The Ethics and Advisory Committee's recommendation on whether a speaker or event should be authorized on campus may be followed by the Student Coordinator. However, the AIMS Code of Practice to Ensure Freedom of Speech and Expression is still expected to be followed.

5.7 Meeting and other activity organizers who intend to invite an external speaker should consult the 'Code of Practice to Ensure Freedom of Speech and Expression'.

6. Academic Freedom and Sensitive Research

6.1 AIMS recognizes that academic employees at AIMS have the legal right to question and challenge established knowledge, as well as to present new ideas and controversial or unpopular perspectives without fear of losing their employment or privileges. It is also acknowledged that research and study of terrorism are relevant and useful, and that staff and students should be permitted to do so without fear of bias. As a result, it is accepted that certain workers (particularly students) would need to view information that promotes terrorism as part of their work. In such instances, it is the responsibility of the relevant member of academic staff to ensure that only information acceptable for the study or other activity is being done out is accessible and that its usage does not incite terrorism in any manner. This might include the utilization of an electronic and/or physical 'safe room' (as some funders now demand some security-sensitive research). To safeguard both the person and AIMS, we now ask anybody who needs access to such material to register with the AIMS CEO ahead of time.

6.2 The AIMS CEO shall be made aware of and approve the details of visiting speakers.

7 Prevent Training

Staff members

7.1 According to AIMS's Prevent Training Plan, all relevant personnel must complete Prevent Duty training as appropriate to their function. The briefing session's goal is to improve knowledge of the Prevent responsibility and AIMS' reporting mechanism for Prevent duty issues. The seminar teaches employees on AIMS' Prevent duty and reporting mechanism.

7.3 Every three years, employees must undergo a refresher course.

7.4 Students who do a placement as part of their degree of study may be required to complete Prevent training before beginning their placement. Students who work with one of the 'specified authorities' listed below will be required to complete such training.

- local governments
- schools
- further education institutions

- higher education institutions;
- the health sectors

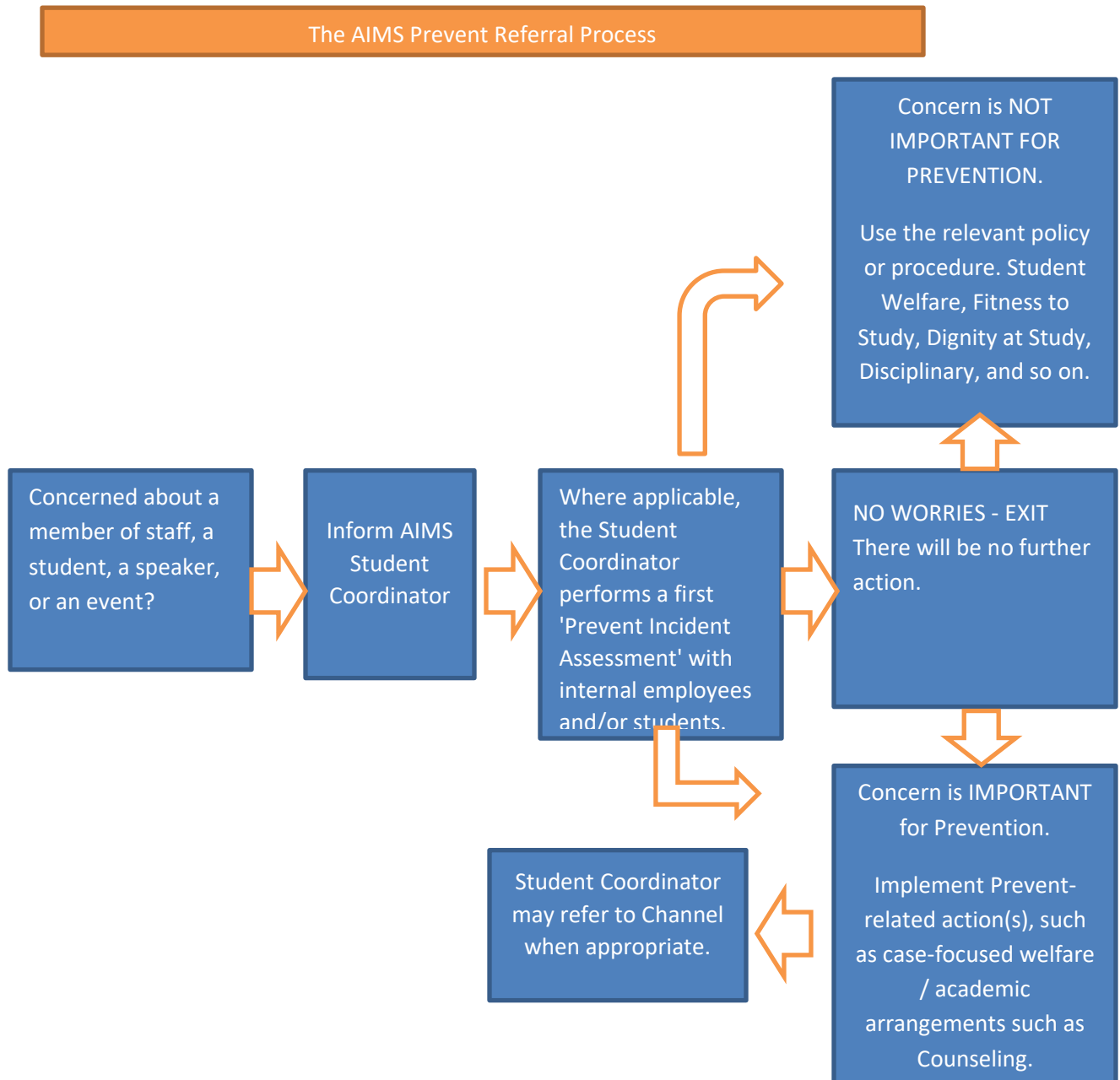
Part 3: How to Report a Prevent Duty Concern on Campus

1. The Student Coordinator is in charge of managing casework that may occur as a result of the Prevent responsibility. This involves administering and organizing necessary welfare and academic support services both inside and outside and/or Channel recommendations.
2. When a Prevent duty issue is raised, it is critical that it is discussed in a safe and supportive environment so that the concern can be adequately assessed, and the relevant response may be implemented.
3. The Prevent Coordinator is responsible for managing any casework that may arise as a result of the Prevent obligation. This includes administering and coordinating essential welfare and academic support services both within and externally and/or Channel suggestions.
4. When a Prevent duty problem arises, it is vital that it is discussed in a safe and supportive atmosphere so that the concern can be properly assessed, and the appropriate action may be adopted.
 - a) Concern is NOT RELATED TO PREVENT; however, it may be related to another policy of AIMS. In such circumstances, a reference to the proper policy / process will be made.
 - b) The concern is RELEVANT FOR PREVENTION but not severe enough to warrant a Channel Referral. In such a case, Prevent-related welfare action(s) will be implemented, such as case-specific internal welfare / academic arrangements - counselling or mental health referral, medical referral, chaplaincy referral, and so on;
 - c) Concern is RELEVANT to Prevent, and the case is serious enough to be referred to the local Channel Panel by the Student Coordinator;
 - d) NO CONCERN and EXIT. There is no need for additional action.

When deciding whether to disclose information with third parties, AIMS will follow the Data Protection Act and its external Prevent Information Sharing Agreement. Personal data can only be shared inside AIMS for Legitimate Business Purposes.

Prevent Referral Flow Chart

Please see the flowchart below for information on the AIMS' Prevent Referral Process.



Staff and students are not required to determine if a true risk exists or to question the individual about their worries. It is critical to refer to any issues raised throughout this procedure. Please contact the Audit and Risk subcommittee at arc@aimscollege.edu.lk.