Should European NGOs withdraw
from the EU Radicalisation Awareness Network's 'Collection of Practices'? –
what does the planned German „Federal Agency
of Quality Control" mean anyway?[1]

Harald Weilnböck, October 2021

Extended Summary

The European Commission's Directorate General Migration and Home Affairs (DG Home) is currently setting out to execute an unwarranted selection measure among European NGOs/ approaches, using the Radicalisation Awareness Network (RAN) as an executive EU high-level evaluator. Each approach achieving a "positive outcome" in this selection will be declared a "best practice" by DG Home/ RAN, in case of negative outcome one would be "labelled" an "inspiring method" only in the RAN Collection of Practices. However, the RAN/ DG Home does not seem to have a sufficient legal and ethical mandate for such assessment measure, and it is unclear to what extent the procedures of informed consent could be sufficiently implemented under the existing circumstances. Furthermore, there is little to no transparency about procedure and criteria of the assessment ("best practice" vs. "inspiring method") – and there does not seem to be any awareness of the evident risks that such a governmental measure may have for a democratic civil society at large. The NGOs that are now invited/ subjugated to this procedure of assessment had, for the last ten years, put their full trust in the RAN and volunteered their work for its build-up. In the meantime, the RAN itself has avoided evaluation since its inauguration in 2011. In Germany, the recent call of the RAN selection measure coincides with the announcement of the recommendation that a „Federal Agency of Quality Control" should be established under the Ministry of Interior (BMI). This has raised great concern among NGO practitioners, in Germany, since there has been an unfortunate administrational tradition (in the BMI and other ministries), to execute random and secret security checks on NGOs, among other similar measures.

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[1] A text in German language which covers almost all parts of this paper will appear under the title: "Das RAN/ EU-Innen-Kommissariat macht sich zum Gesamtevaluator der europäischen NGOs in der Extremismusprävention – und was beutet eigentlich das geplante ‚Bundesinstitut Qualitätssicherung'?", https://cultures-interactive.de/de/positionenkommentare.html.

The DG Home/ RAN measure is, however, just one symptom of a larger policy development, endangering trust and resilience within democratic societies throughout Europe, in particular the interaction between NGO and governmental actors. Another symptom being e.g., the RAN Rehabilitation Manual which demands "information-sharing" about exit work clients with security agencies as prerequisite – and also abandons the established good practice standard of confidentiality and the do-no-harm principle in client work. The most recent RAN paper on Quality Management and Evaluation of P/CVE reinforces this. Yet another symptom being the DG Home "Internal Security Fund/ Police" inviting proposals to develop "mechanisms to assess the trustworthiness of NGOs", in other words providing funds for distrusting civil society/ NGOs – which will presumably be welcomed by some Eastern European governments in particular. Hence, although all actors seem to have good intentions, inklings of some sort of prevention-police-state seem looming on the horizon and risks of significant 'EU added damage' emerge.

Therefore, Cultures Interactive intends to withdraw its RAN "practices" from the RAN Collection.

*Thankfully, a silver lining of hope and innovative potential is visible when instead we turn **towards a truly civil society-based architecture of inter-agency prevention**. Here, the professional civil society practitioners and NGOs in the field are provided the means **to independently self-organize their work and quality management,** together with equally independent academic expertise, **aiming at the systematic build-up of an association or professional chamber** with solid methodology and ethics standards. This has basically already been under way in the German prevent program "Live Democracy!" – and should not be thwarted for political reasons now. If, at the same time, the basic design flaw within the logic of DG Home's setup of the RAN is corrected – and the main administrational liaison of the RAN is shifted to ministries/ directorates of social affairs, health, family, education, inter alia – sustainable solutions will be in reach. Also, the plans for a „Federal Agency of Quality Control" in Germany should be cancelled. Moreover, if the notoriously used "P/CVE" term, i.e., Preventing/ Countering Violent Extremism, will eventually be duly separated into different areas of activities – and thus key divisions of power and functions are kept which is so crucially important for resilient democracies – this then could well enable Europe to become a prime example of "best practice in policy making" on a global scale**.***

The European Commission's DG Home Affairs executes an unwarranted vetting procedure – the RAN becomes the grand executive evaluator of European NGOs

German civil society organizations and NGOs in the area of preventing violent extremism are currently quite worried! These worries are caused by governmental plans to build a "Bundesinstitut Qualitätssicherung" which, given its context, translates to "Federal Agency for Quality Control of NGOs in preventing extremism".[2] While nothing is known yet about the specifics of these plans, the NGO's worries are warranted for various reasons. These worries also stem from recent experiences with the German administrational tradition of imposing so-called "extremism clauses" in funding contracts and executing random and secret security checks on NGOs engaged in prevention, implemented by intelligence/ secret service agencies[3] – so that the announcement of a Federal Agency for Quality Control just does not ring very well with many NGOs.

However, currently one may also watch directly as it happens what it is like when a governmental security agency begins to evaluate the approaches and civil society organizations in the field of extremism prevention, separating the wheat from the chaff, so to speak. And this happens after these civil society NGOs had trustfully volunteered their time and effort to this very agency. Since at least mid-July 2021, this can be watched live at the Radicalization Awareness Network (RAN), which is steered and run by the European Commission's DG for Migration and Home Affairs (DG Home) in which the German Ministry of Interior, BMI, has a strong voice since several years.[4]

After years of confidence-building that have encouraged dozens of civil society organizations from all European countries to engage in the RAN as voluntary contributors, through organizing workshops, preparing inputs for the RAN „Collection of Practices" [5] or simply

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[2] As to the Bundesinstitut Qualitätssicherung" cf. Cultures Interactive e.V. Position paper (2021): „Positionspapier von Cultures Interactive e.V. – Zu den ‚Eckpunkten für ein Gesetz zur Förderung' der Demokratie sowie zum ‚Maßnahmenkatalog des Kabinettausschuss zur Bekämpfung von Rechtsextremismus und Rassismus'." https://cultures-interactive.de/de/positionenkommentare.html

[3] Harald Weilnböck (2021 forthcoming): „Its civil society, stupid!" – Positionspapier von Cultures Interactive über den derzeitigen Evaluationsdiskurs in der Extremismusprävention, nebst eines alternativen zivilgesellschaftlichen Lösungsvorschlags. https://cultures-interactive.de/de/positionenkommentare.html

[4] The Radicalization Awareness Network (RAN) has been inaugurated on the 10th anniversary of 9/11 in order to encompass practitioners and NGOs in the area of preventing violent extremism throughout Europe, collect their expertise and inform policy makers. Critics hold that the RAN has deviated from this mission to certain extents, cf. https://cultures-interactive.de/en/ran-essay-en.html.

[5] The RAN „Collection of Practices" was built by inviting practitioners mostly from NGOs to provide descriptions of their methods and approaches; these were included in the Collection after the practitioners had presented them in

through attending, the DG Home/ RAN leadership now seem to see the moment come to carry out a selection among these NGO's approaches included in the Collection. In case of a "positive outcome … of the review", DG Home/ RAN will declare the NGO/ approach to be a "best practice". In case of a negative outcome, one is only "labelled" an "inspiring method" – presumably something not to be mentioned in future funding applications.

This selection will arguably be carried out in the same manner all measures and activities of the RAN seem to have been handled since its inauguration ten years ago (the RAN being run and controlled by the EU security agency DG Home Affairs). That is, the procedure of selecting and upgrading some NGOs/ approaches at the expense of devaluing others will be carried out in a combination of non-transparent steering by the central EU security authority and simultaneous participatory gestures vis-a-vis NGOs (whereby, due to the non-transparency of the procedure, interests of individual NGOs or specific agencies may always have an impact). In terms of such participatory gesture, the RAN email of 8/7/2021 with the subject matter "Call for experts: reviewing RAN Collection practices", simply calls upon its 'RAN experts' (who received their statuses in an equally non-transparent manner through being instated by RAN/DG Home) to apply for the function of exchanging with and making assessments on their collegial NGOs' approaches, for 400 Euros of remuneration. While all actors certainly mean well and have good intentions, this all is rather disconcerting indeed, for various reasons.

Civil society and NGO affairs do not belong into the hands of governmental agencies

By any standards, the RAN/ DG Home does not seem to have any legal or ethically sustainable mandate for this impromptu and far-reaching evaluation and assessment measure ("best practice" vs. "inspiring method"), subjugating a large part of the most engaged NGOs throughout Europe. Unsurprisingly, it is unclear to what extent the procedures of informed consent could at all be sufficiently implemented under the existing circumstances. The upper mail to the so-called RAN experts which, however – erroneously or not – seems to have been sent to the entire RAN NGOs and attendants was the only indication to the public that such review and assessment will be executed. Mails asking for further information remained unanswered so far. Rather, the RAN/ DG Home, as so often before, seems to assume that they – sort of – own these NGOs' approaches as if these were governmental sub-agencies; which is paradoxical since, as said, these NGOs have provided immense voluntary work for

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the context of a RAN workshop to EU colleagues. The Collection's intent was to show the depth and breadth of the European area of PVE approaches and support the area of activity as such.

the RAN over the last ten years in order to build it. Numerous products and outputs were produced and numerous careers were built on the back of these voluntary RAN practitioners from European NGOs. Also, the procedure and criteria of this selection measure – which, as said, may be untenable in legal respect – seem to not be publicly accessible nor scientifically sound. Also, by the way, this measure begs the mention that the RAN itself as a program has avoided to be evaluated throughout its ten-year existence – which has been publicly noted four years ago, to no avail. (https://cultures-interactive.de/en/ran-essay-en.html)

Once again, one can only shake one's head in disbelief at this brazen attempt of a government agency to pull a large part of European civil society NGOs into an uncalled-for vetting process – in the summer slump – and which will unfailingly harm trust among European civil societies and democracy as such.

Hence, the evident conclusion from this – and the first ten years of experience with the RAN – is: Neither a network of civil society NGOs, nor much less their evaluation, ever belong in the hands of a governmental agency, let alone a security agency or its dependent executors. Rather, civil society and its professional practitioners should be provided with the means to independently self-organize their work and quality development, while both enjoying and assuring confidentiality, personal rights and data protection on behalf of their clients (in areas as prevention, deradicalization, rehabilitation, civic education etc.). They should work together on this with equally independent academic researchers and consultancy; which may aim at an independently founded and run association/ professional chamber (i.e., of exit workers) with solid standards of ethics and professionalism and sound procedures of quality management. For sure, inter-agency teamwork with security agencies will also be an important element – but differently done than now.[6]

These fundamental observations should be taken to heart in all future endeavours of procuring quality management of civil society organisations, so that the do-no-harm principle and individual rights can be ensured – as well as the sustainable impact of our work in a multi-agency framework. Otherwise, serious 'EU added damage' to European civil societies is to be expected.

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[6] The independently elaborated standards of good practice in prevention, 'deradicalisation' and rehabilitation which have been worked out in a self-directed manner by civil society's professional practitioners, have recently been reconfirmed and further elaborated in the "The policy brief of the EXIT Europe project" (2021) which was also based on the 2016 „RAN Derad Declaration of Good Practice – Principles of Sustainable Interventions in Disengagement and Rehabilitation (Deradicalization) from Involvement in Violent Extremism and Group Hatred", which, however, was not included in the DG Home/ RAN websites for reasons which have not been explained to the RAN Derad group at the time; cf. https://cultures-interactive.de/en/ran-essay-en.html.

SOS/ Save Our Souls – as civil society and democracies

There is definitely some urgency to this. For this assessment measure seems to be just one symptom of a larger development in governmental policies on PVE which some call the "securitization" and "governmental appropriation" of civil society activity in prevention and rehabilitation work (some detailed impacts of which have also been flagged in 2018; https://cultures-interactive.de/en/ran-essay-en.html).[7]

One among many recent instances of this disquieting development of "securitization" is the 2020 RAN Rehabilitation Manual for exit work practitioners all across Europe, authored by an NGO that works closely with governmental authorities and the RAN/ DG Home leadership. This Manual, without having a solid mandate by independent European NGO practitioners' – since the often evoked "RAN practitioners" are and have always been workshop attendees more than members of the RAN with any specific rights – declares it a European standard of good practice for practitioners to engage in "information-sharing between different state authorities and relevant CSOs" (Civil Society Organisations) and "ensure that all actors have all the information they require". Policy experience from Germany from many years underlines that this specifically means to foster "information-sharing" about clients of exit work who are rated high-risk. But the meaning of this request of "information-sharing", which is not specified to any length in the Manual, may well be held to extend much further that to clients who are declared high-risk. It is presumably without any cynicism – but rather with good intentions – that this information sharing is called good practice in "multi-agency cooperation". Moreover, the Manual conceals the fact that independently working first-line practitioners throughout Europe have always viewed uncompromised confidentiality as the most important principle of good practice in client work, i.e., the opposite of "information-sharing". Hence, the Manual both relinquishes confidentiality, setting its very opposite as a standard, and does not mention the fact that practitioners in the field overwhelmingly and decidedly disagree with this – but for various reasons feel that they cannot speak out loud about this anymore.[8]

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[7] Some German literature on the issue of securitisation will be referenced in the upcoming "Handreichung Distanzierungsarbeit", by Cultures Interactive e.V. (in its capacity as member of the Competency Network on the Prevention of Right-wing extremism, Komprex, within the nation prevent program "Live Democracy!") to be published by the end of the year on https://cultures-interactive.de/en/articles.html.

[8] Several smaller RAN papers by the RAN EXIT working group communicated in a similar manner. The fact that the procedure of "information sharing" (which seems to be imposed top-down by DG Home through the RAN), fundamentally disagrees with what European practitioners have independently established as their good practice

The most recent RAN paper on Quality Management and Evaluation of P/CVE (2021) reinforces this security agency driven request for "information sharing" in a quite smooth and almost invisible manner. Among this paper's "key insights" it is stated that "considering ethical dimensions throughout evaluation processes is important" especially in exit work, which is nice and consoling to read for first-line practitioners – and the paper then hastens to add that exit work should be "based on (long-term) relationships and trust with clients" which sounds even nicer and is, indeed, entirely appropriate. Any mention of the fact that trust and confidence in client work absolutely rely on its uncompromised confidentiality – and that any confidence-based client work without confidentiality is simply unfeasible and unethical – is omitted in this passage, as it is in the Manual. Rather, the following key insight in the course of this paper is referring once again to "information sharing between state and non-state as well as between security and non-security actors". Here it is even conceded that this information sharing "tends to be a sensitive topic in the daily practice of joint P/CVE work" without any further comment – which is the friendliest possible way of saying that in exit work and preventive interventions there must be information sharing with security agencies despite of some "sensitivities" – and "joint P/CVE work" must be „joint" in the understanding of what security agencies define as being "joint work".[9]

Hence, it is to be feared that the above-mentioned RAN selection measure will likely select mostly those NGOs/ approaches as "good practice" that reflect the set standards of the RAN Manual and "share information" with security agencies. This, however, we will not be able to known for sure nor debated, since the selection procedures and criteria are largely non-public and not transparent. Hence, as much or as little as we can know about all this, the following seems to be the case: The highest European security agency, DG Home, sets the "best practice" standards for civil society NGO practitioners, or rather, it lets them be set by an NGO from RAN (which has been installed as leads of the RAN Rehab working group).

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standards over the last ten years both nationally and on EU level, is well documented e.g. in the „RAN Derad Declaration of Good Practice" (2016) which, however, was barred from entering the RAN websites at the time, as already stated in footnote 7.

Moreover, the exact phrasing of the imposition of this "information sharing" can be found verbatim in a German security agency document which was not accessible to the professional field until very recently and is not fully public even today; it thus can hardly be held to reflect European practitioners' views and assessment; cf. Harald Weilnböck (2021): "The negation of confidentiality – the EU Radicalisation Awareness Network's silent trimming of exit work through ‚directive workshop reporting'", (working title, forthcoming). Earlier observations on this topics have been made in several contributions since 2017 on https://cultures-interactive.de/en/ran-essay-en.html.

[9] https://ec.europa.eu/home-affairs/what-we-do/networks/radicalisation_awareness_network/ran-papers_en.

The paper also concedes that "evaluating this work … can raise issues of confidentiality and data protection", but it does not say which is evident, that already the mandatory "information sharing" during "joint" exit work does not only raise issues but clearly violates ethics and the spirit of the EU General Data Protection Regulation.

Communicating these set standards through RAN workshops also allows to create the impression that there is a European NGO practitioner consensus on these standards, which is not the case.[10] Then the pertinent NGOs/ approaches are selected who are willing, for whatever reasons, to go along with these standards – one key standard being: "information-sharing" about clients of exit work with security agencies.

So, as gloomily as this may sound, one cannot help but wonder whether Europe – being surrounded by Trump, Putin, Li Keqiang among others, also Boris Johnson for that matter – has not unwittingly began to turn into some sort of a prevention-police-state during the last decade, which seems to be governed by a deeply ingrained distrust of civil society organisations.

One only needs to imagine for a moment, how such EU standard of "information-sharing" with security agencies about clients of social work and counselling would be welcomed by some Eastern European member states. The current Polish or Hungarian governmental security agencies are not unlikely to be very interested to take the above described EU mechanism of vetting NGOs as an example and also begin to select only those NGOs that are obedient to their standards.[11] Or thinking this though the other way around: Given that the Polish or Hungarian governments have been practicing such obedience oriented vetting already for a long time anyway, this begs the question whether the EU is now set to follow their example.

These observations also call to mind yet another recent instance of "securitization" which involves a European Commission „Internal Security Fund – Police" Call from 2020 – also coming out of DG Home – inviting proposals in the area of preventing so-called radicalisation (ISFP-2020-AG-RAD). For, this call, as brazenly as the above selection of RAN practices invites proposers to develop "a mechanism to assess the trustworthiness of NGOs". Apparently, the responsible levels in DG Home are unaware or oblivious to the attached serious risks for societal resilience on the whole. Consequently, in this year, in 2021, there will be some teams in Europe which receive public funding from state security agencies for systematically distrusting the "trustworthiness" of civil society. This is instead of supporting autonomous civil society structures and providing them with the means to independently

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[10] Cf. footnote 9, "The negation of confidentiality …".
[11] Oliver Kossack & Harald Weilnböck (2019): The EU's "Islamism" bias and its "added damage" in Central and Eastern Europe. On the absurdity of a Western European extremism prevention program which indirectly strengthens right-wing extremism in Eastern Europe. https://www.opendemocracy.net/en/global-extremes/the-eus-islamism-bias-and-its-added-damage-in-central-and-eastern-europe.

develop their own professional and ethics standards and quality management, in conjunction with equally independent academic expertise, as suggested above.

Once again, this invokes the above-mentioned inklings of some sort of prevention-police-state – that emerge although all persons involved certainly have good intentions. Yet, active civil society associations and professional practitioners in prevention and rehabilitation work are experiencing massive encroachments from state actors and security agencies in areas that used to and ought to be taken care of by civil society independently – and not steered by governmental actors. This will unfailingly harm our Western democracies most valuable asset: independent civil society and independent academic research, also respective journalism. However, at this point in time we even seem to have forgotten why modern democracies had come around emphasizing independent civil society so much in the first place – in the wake of World War II and all that lead up to it. Even some of our civil society NGOs seem to have forgotten and more or less willingly cooperate. Hence, the present challenge is of quite some magnitude – and requires determined action.

European NGOs should withdraw their practices from the RAN Collection – 'RAN experts' should not enable the RAN selection of practices

As to the RAN selection of practices and our NGO, Cultures Interactive e.V., the board of Cultures Interactive is currently processing our request to withdraw all CI "practices" from the RAN Collection in protest to the uncalled for and unauthorized RAN selection measure. Cultures Interactive e.V. recommends all other NGOs do consider their withdrawal as well. Cultures Interactive e.V. also calls upon the 'RAN experts' to not enable the RAN selection measure by participation in the measure.

In case the RAN Collection of Practices – and the RAN as such – should be utilized for purposes of quality development in responsible and ethical manners, which would be a new but principally desirable ambition for the RAN that should be pursued as far as possible, this then would require an entirely new setup of the RAN itself. In any event, such overhaul would go far beyond asking NGOs retroactively to sign informed consent sheets – which, by the way, should be refrained from by all means since this would just multiply the damage. Because asking for a consent signature would lead the European NGOs once again into – politically caused – conflicts and undue competition which further impedes their work and damages working conditions. The foreseeable reaction in the field of collegial NGOs would once again be wanting to be better than the others and outdo each other businesswise, instead of counselling and mutually training each other in the context of an independent association. Yet

another reaction would be to sign the informed consent sheets out of feeling dependent on governmental funders and authorities (similarly to how the clients of exit work in a "information sharing" setting may feel strategize), although one does not really want to give consent, either because one does not trust the RAN selection procedure or one does not expect a real quality benefit from it.

How such refurbishment of the RAN would need to look like is sketched to some extent in the following and more detailed in related papers about evaluation in the area of preventing violent extremism.[12]

A basic design flaw in the European prevention architecture – and the German „Federal Agency of Quality Control"

Coming back to the current worries of German civil society NGOs, these colleagues understandably wonder whether the planned "Federal Institute for Quality Control" could also be expected to carry out the kind of official selection and standard setting measures that are currently executed on EU level. Of course, this cannot be predicted with certainty. From an organizational analysis point of view, however, this seems almost inevitable. After all, both initiatives, the RAN and the Federal Institute, can be traced back in part to the same institutional origins, the German Federal Ministry of the Interior, the BMI – while, however, the inception of the RAN stemmed from Swedish commissioner Cecilia Malmström in 2011 and did not seem to have envisioned the current developments.

These predictions, as previously mentioned, are however futile. After all, complex, directive-driven governmental organizations in political contexts are basically unpredictable over time and sometimes not even bound by the professional standards of the respective activity field. This makes it all the more urgent for dedicated practitioners and their NGOs to seek an independent and evidence based professional framework for their work – which brings us to recall the above conclusion: Networks of civil society NGOs and their evaluation just should not be steered by security authorities. For, these authorities have an entirely different set of competencies.

Therefore – and speaking of competencies – it needs to be noted that this unfortunate state of affairs may well be understood as a tragic misunderstanding that springs from a veritable

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[12] Harald Weilnböck (2021 forthcoming): „'Its civil society, stupid!'" – Positionspapier von Cultures Interactive e.V. über den derzeitigen Evaluationsdiskurs in der Extremismusprävention – nebst einer zivilgesellschaftlichen Alternative zum ‚Bundesinstitut Qualitätssicherung, https://cultures-interactive.de/de/positionenkommentare.html

design flaw within the setup of the European prevention architecture. This design flaw lies in the fact that for the past ten years two fields have been put closely together within governmental structures which have never actually been very suitable for each other: civil society prevention practitioners/ NGOs and state security agencies. Yet, in many European member states, responsibilities for prevention and deradicalization have been placed ad hoc – and in a misguided intuition – in interior ministries and security agencies, as is also the case at the European Commission/ DG Home. (Even the first meeting of the RAN with the US administration during the Biden administration was set with: US Homeland Security, hence with the national security organisation.[13]) This had happened in spite of the quite evident fact that the activity area of prevention, by their very nature, would rather belong to directorates/ ministries of social affairs, health, family, education, inter alia, as these are the ones that are competent in and responsible for services of social work, counselling/therapy, rehabilitation, education, and the like.

So, what is happening now – governmentally steered selection measures, imposition of non-evidence-based standards, governmental vetting of NGOs, random secret service security checks of NGOs etc. – and what has understandably led to many worries and fears today, is and has been really completely logical and predictable. Because the state actors/security authorities tend to do what their structures, professional ethos and competences tell them to do and these structures suggest: focus on risks/ dangers, assumptions of ill intention, control/ restriction, security checks etc. This is what security authorities need to and are competent to do. – But none of this goes very well with any effective facilitation of counselling/ therapy, rehabilitation nor with designing governmental programs in this activity area together with civil society.

Hence, it is because of this design flaw that we – while all involved persons have the best intentions – seem to be sliding into something which we labelled a prevention-police-state above. For, this is what design flaws do, they silently cause tremendous damage despite everybody wanting the best. For, as the saying goes: The road to hell is paved with good intentions.

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[13] Cf. the EU-USA video study visit of DG Home/ RAN with the U.S. Department of Homeland Security (DHS) Office for Targeted Violence and Terrorism Prevention (OTVTP) – which took place on 24-25 March 2021, https://ec.europa.eu/newsroom/home/items/716438/en.

Necessary corrections – and a silver lining of hope

Now, this is the reason why not only the above-mentioned RAN selection of practice measure should be pulled back as a matter of course, but also, we should go much further, to the root of the problem and thus indeed be a bit radical about it: The European prevention architecture needs to be reassessed and corrected profoundly. For the RAN this means, given the first ten years of its existence and its unwillingness to have any evaluation on itself, also to acknowledge detailed critical comment from outside and learn from it[14]: RAN's procedures should be rebuilt and its institutional liaison be changed to a DG with competencies on social/ health/ family/ education affairs.

In a word, looking at the notoriously used abbreviation "P/CVE" – Preventing/ Countering Violent Extremism – the real of the "P" and the "C" urgently need to be separated into two independent areas of activity and not stay lumped together as is right now. For, preventing and countering are fundamentally different branches of intervention and policy making, showing important interfaces with each other but being essentially different. Therefore, we should not misunderstand this lumped together "P/CVE" as successful 'inter-agency cooperation', because in reality it most often came down to procedures which are reflected 'int**ra**-agency' or 'mono-agency', with NGO practitioners being turned into agents of governmental actors. This, however, means losing sight of key divisions of power and functions which are so crucially important for democracies.

As for the planned "Federal Institute for Quality Control" in Germany, these plans, too, should be withdrawn, for the same reasons. Instead – and this needs to be said again – structures should be laid out that enable civil society, its professional practitioners and NGOs to independently self-organize their work and quality management in preventing violent extremism and anti-democratic movements, together with equally independent academic expertise, aiming at the build-up of an association/ professional chamber (i.e., of exit workers and/or preventive interventions) with solid professional and ethics standards.

As a silver lining of hope, even in Germany, one may recognize that good practice in the build-up of civil society based association(s)/ a professional chamber of prevention work is already under way – however now in danger of being stifled by the Federal Institute: The "national working groups" and "competency networks/ centres of excellence" which were established in the existing governmental prevent program "Live Democracy!" in order to encompass civil society practitioners and NGOs of preventive interventions seemed well set to develop into

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[14] Some of which can be found on https://cultures-interactive.de/en/ran-essay-en.html.

such associations, possibly even a professional chamber – if they are further supported in their professionalism (cf. footnote 3).

Moreover, there are, fortunately, already many small niches of good practice in teamwork between civil society practitioners and security agencies – which is a level of teamwork that will be key also in any newly corrected architecture of prevention programming. To mention but one example, the police of North Rhine-Westphalia has launched an exit program for young people entangled in criminal clans which often overlap with violent extremist structures. In doing so, it is even the police and the security authorities themselves who – out of a good understanding of how preventive measures and processes of facilitating exit work function – insist on a consistent "one-way street" in exchanging information. This means that after the initial contact with a delinquent person who is entangled in group structures and presumed to be a risk to themselves and/or others, the security authorities inform a qualified prevent practitioner/ exit facilitator and ask her*him to intervene – but do not expect any personal information or risk assessments back from them. The Director of Criminal Investigation in North Rhine-Westphalia, summarizes this teamwork procedure as follows: "...the police officer first talks to the young person; then they come back and talks to the prevent practitioner; they give all information to the prevent practitioner; however, this is a one-way street, i.e. the prevent practitioner does not give any information back to the police".[15] So there is definitely a collegial inter-agency relationship of systematic interaction here, but it is deliberately based on a "one-way street" with regard to client-related information exchange, because there is an agreement that this is indispensable for the effectiveness of the prevent program. For the same token, all issues of quality management are handled independently from the police.

All this, in fact, is more than a silver lining! This is also a grand opportunity both for Germany and for Europe. To say this with as little pathos as possible: The current state of affairs – i.e., the planned "Federal Institute for Quality Control", the RAN selection measure, secret security checks on engaged NGOs by intelligence … – does have a taste of the German and European past. Instead, an air of a truly hopeful future for democratic societies would emerge when the somewhat radical shift towards a new prevention architecture would be courageously taken. Indeed, this would qualify Europe as a prime global example of "best practice" in policy making – i.e., in developing a modus of civil society-based inter-agency prevention programming that reflects the best aspects of European social history.

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[15] Jörg Unkrig (2020): „Clan-Kriminalität: Hilfsprogramm für Jugendliche, die aussteigen wollen"
; minute 9.