Experiences working with NPOs and Governments on the Risk Assessment Process

Ben Evans
Senior Associate
Greenacre Group
Some persistent misunderstandings

1: NPOs are (all) particularly vulnerable.

2. The National Risk Assessment covers the risk assessment requirement in R8.

3: If in doubt, impose more regulation!

4: Focus on laws and regulations, at the expenses of ‘other measures’
Issues with Risk Assessments (1)

• Difference between ‘FATF NPOs’ and NPOs as defined in the country’s law.

• Dealing with information gaps
  – Lack of data
  – Confidentiality

• Qualitative vs. quantitative data

• The difference between ‘risk’ and ‘consequence’
Issues with Risk Assessments (2)

• Circular categorisation

• Discrepancies between organisational and functional categories

• The consequences of the results
  • De-risking
  • Singling out
Our approach

• Using global information to fill local gaps

• Demonstrating to Evaluators how you have come to your conclusion

• Inclusiveness
Is the evidence that supported your assessment strong enough to support its publication, bearing in mind the potential impact on public trust and government policy?