

SUB-SAHARAN AFRICA CIVIL SOCIETY CFT-CONFERENCE 2024 REPORT

Together, Countering Financing of
Terrorism (CFT) while Safeguarding Civic
Space in Sub-Saharan Africa



Acknowledgements

This CSO-led conference on countering terrorism financing while safeguarding civic space was made possible through the generous support and contributions of our donors Ford Foundation and Mott Foundation, sponsors; Brot für die Welt (Bread for the World), Natural Justice, Global Centre for Cooperative Security and CSO Coalition of Human Rights and Counter Terrorism.

Civic Advisory Hub (CAH), Defenders Protection Initiative (DPI) and Spaces for Change (S4C), extend heartfelt thanks to our distinguished speakers from the Ministry of Finance, Planning and Economic Development (MoFPED) the Financial Intelligence Authority (FIA), Uganda Police Force, National Bureau for NGOs in Uganda (NGO Bureau), Public Benefit Organizations Regulatory Authority-Kenya, Financial Intelligence Centre -Zambia, as well as representatives from regional communities; African Union (AU), Common Market for Eastern and Southern Africa (COMESA), the Intergovernmental Authority on Development (IGAD), Interpol Regional Bureau of Harare for Southern Africa, Eastern Africa Police Chiefs Cooperation (EAPCCO), and the Non-Profit Fraternity from across Sub-Saharan Africa.

We also deeply appreciate the moderators and panellists who guided our discussions and enriched the dialogue over these two days.

Asanteni!

Partners



Sponsors



Donors



Acronyms

AFRIPOL	African Union Mechanism for Police Cooperation
AMLA	Anti Money Laundering Act
AU	African Union
CAH	Civic Advisory Hub
CBO	Community Based Organisation
CFT	Countering the Financing of Terrorism
COMESA	Common Market for East and Southern Africa
CSO	Civil Society Organisations
CVE	Countering Violent Extremism
DPI	Defenders Protection Initiative
EAPCCO	Eastern Africa Police Chiefs Cooperation
EU	European Union
FATF	Financial Action Task Force
FIA	Financial Intelligence Authority
FIU	Financial Intelligence Unit
GITOC	Global Initiative Against Transnational Organized Crime
IGAD	Intergovernmental Authority on Development
ML	Money Laundering
MNJTF	Multinational Joint Task Force
MoFPED	Ministry of Finance, Planning and Economic Development
NGO	Non Governmental Organisations
NGO Bureau	National Bureau for NGOs in Uganda
NPO	Non Profit Organisations
REC	Regional Economic Communities
SADC	Southern African Development Community
SCP	Senior Commissioner of Police
S4C	Spaces For Change
TF	Terrorism Financing
UPF	Uganda Police Force
WACSI	West Africa Civil Society Institute

Glossary

Terrorism Financing

The act of providing financial support to terrorists or terrorist organisations to enable them to carry out terrorist acts or to benefit any terrorist or terrorist organisation.

Securitization

The process by which states adopt various security-focused measures to counter terrorism and violent crime within their counterterrorism and Countering Violent Extremism (CVE) frameworks. However, this approach is often exploited as tools for consolidating power and authority.

Securitization of Civic Space

The use of counter terrorism and national security laws (including emergency laws) and discourse to restrict and criminalise assembly, expression, and association.

Contents

Acknowledgements	2
Acronyms	3
Glossary	3
Executive Summary	6
Introduction & Background	6
Welcome Remarks	9
Ms. Hilder Achiro Programs Executive, Defenders Protection Initiative (DPI)	9
Ms. Victoria Ibezim Ohaeri Executive Director, Spaces For Change	9
Opening Remarks	
Mr. Moses Ogwapus Vice Chairperson Uganda AML/CFT/CPF Task Force and Commissioner Financial Services MoFPED	10
Mr. Samuel Were Wandera Executive Director, Financial Intelligence Authority, Uganda	10
SCP Waswa David Director Counter Terrorism Directorate, Uganda Police Force	11
Special Remarks	11
Mr. Christopher Suna Kayoshe Acting Head of Disarmament, Demobilization, Reintegration and Security Sector Reform Division – African Union	11
Contemporary Outlook: CFT Eco System at a Glance	12
Mr. Yona Wanjala – Executive Director, Defenders Protection Initiative, Advisor - Civic Advisory Hub	12
Debating inclusivity, openness and transparency in Regional Economic Communities frameworks of countering Terrorism Financing in Sub-Saharan Africa.	13
Ms. Elizabeth Mutunga Head Governance, Peace and Security- COMESA	14
Mr. Christopher Suna Kayoshe Acting Head of Disarmament, Demobilization, Reintegration and Security Sector Reform Division – African Union	14
Dr. Martha Njiri- Head of Strategic Communication, The Intergovernmental Authority on Development -IGAD	15
Ms. Omolara Balogun, Head, Policy Influencing and Advocacy, West Africa Civil Society Institute	15
Mr. Henry Muguzi, Executive Director, Alliance For Finance Monitoring	16
Mr. Monametsi Sokwe, Executive Director, Southern African Council of NGOs	16
Summary of Discussion and Key Recommendations	17
Appraising the Enforcement and Accountability Mechanisms, Processes and Procedures of Regional Security Agencies in the Quest Against Terrorism Financing.	18

Mr. Africa S Apollo CEO EAPCCO/ Interpol General Secretariat	19
Mr. Sello Moerane Head of INTERPOL Regional Bureau of Harare for Southern Africa	19
Dr. Sylvia Auma Directorate of Interpol and International Relations, Uganda Police Force	20
Ms. Zaina Kombo Campaign Manager, Equality and Antidiscrimination-Amnesty International, Kenya	21
Ms. Sally Maforchi Mboumien Executive Director, Common Action for Gender Development	21
Q&A	22
Examining the drivers, risks and challenges of de-risking, financial exclusion and financial inclusion.	23
Mr. Haider Dingomar ABSA Bank Mozambique	24
Mr. Katto Hassan Muwonge Senior Manager Compliance, Stanbic Uganda	24
Ms. Sola Olutayo Spaces for Change, Ghana	25
Mr. Onesmo Paul Olengurumwa National Coordinator Tanzania Human Rights Defenders Coalition	25
Mr. Emilio Jose Manuel President, Lusophone Platform for Human Rights	25
Q&A	26
Countering the Financing of Terrorism in Sub-Saharan Africa: Understanding and mitigating the Unintended Consequences	27
Mr. Bright Besigye Manager International Relations, FIA-Uganda	28
Mr. Diphat Tembo Director Compliance and Prevention Department, FIC- Zambia	29
Ms. Martha Ounda Ag. Secretary to the Bureau, NGO Bureau	29
Mr. Fredrick Okado Programs Manager, Muslims for Human Rights	29
Ms. Charity Ahimbisibwe Executive Director, Electoral Laws Institute	30
Mr. Mutuma Nkanata Executive Director, Public Benefit Organization Regulatory Authority, Kenya.	30
Mr. Ernest Nyimai Executive Director, National Association of NGOs	31
The Securitization Of Civic Space In Uganda, Mozambique, Eswatini, Tanzania, Kenya and Zimbabwe: Emerging Trends, Patterns And Impact.	31
Summary of Discussion and Key Recommendations	36
Way forward & Takeaways	37
Annex	38
African Civil Society Kampala Declaration	41
Pictorial	41

Executive Summary

Overview

On 5-6 August 2024, the Civic Advisory Hub, in collaboration with Defenders Protection Initiative, and Spaces for Change, hosted a regional Conference in Kampala Uganda, under the theme ***"Together-Countering the Financing of Terrorism While Safeguarding Civic Space in Africa"***. This two-day conference brought together 140 delegates from across Africa including among others: regional and national government experts and policy-makers responsible for combating the financing of terrorism and organised crime, as well as representatives of the Not -for- Profit fraternity, banking sector, international organisations and academic experts, to share their experience and insights regarding: how **TOGETHER**, we can collaborate in countering the Financing of Terrorism (CFT) while safeguarding civic space within Africa.

The conference discussions hinged on the fact that Terrorism remains a global threat, and one key strategy to counter it is disrupting its financial networks. States and international bodies have implemented CFT measures, including stricter legal frameworks, enhanced due diligence, and de-risking strategies. However, these measures have placed significant burdens on civil society encompassing Civil Society Organizations (CSOs) such as Non-Governmental Organisations (NGOs), Community Based Organisations (CBOs) Human Rights Defenders (HRDs), humanitarian aid providers and activists, restricting their ability to operate effectively.

Topics discussed at the conference included:

- a. Inclusivity and Transparency in REC Frameworks for CFT
- b. Enforcement and Accountability in Regional Security Agencies
- c. De-risking and Financial Exclusion
- d. The Securitization of Civic Space: Emerging Trends, Patterns And Impact.

Inclusivity and Transparency in REC Frameworks for CFT

A major issue raised was the exclusion of CSOs from CFT dialogues by states and Regional Economic Communities (RECs). When CSOs are invited to participate, their involvement is often tokenistic. Frameworks designed by RECs focus heavily on regulatory and security measures, neglecting to address the socio-political and economic root causes of terrorism.

For instance, the Common Market for Eastern and Southern Africa (COMESA) has developed CFT frameworks that guide member countries in reviewing laws, developing Anti-Money Laundering (AML) and CFT guidelines, and strengthening law enforcement agencies. These frameworks are intended to enhance the tracing of illicit funds, prosecuting financial crimes, and recovering assets. Similarly, the African Union (AU) emphasises strengthening state systems through intelligence sharing among member countries and bolstering police cooperation via AFRIPOL, working closely with FIUs. While these measures are vital for national security, they often overlook the unique role CSOs play in countering terrorism by addressing the socio-political and economic causes at the grassroots level.

In contrast, CSOs are uniquely positioned to work closely with communities and identify early warning signs of violent extremism. While some progress has been made, such as Intergovernmental Authority on Development (IGAD)'s efforts to engage civil society, CSO involvement in CFT frameworks remains limited. More inclusive and meaningful participation by civil society in formulating and implementing CFT frameworks remains limited. Transparent policies are necessary to develop holistic strategies for countering violent extremism.

Enforcement and Accountability in Regional Security Agencies

The enforcement mechanisms employed by states and Regional Security Agencies remain highly securitized, focusing primarily on intelligence analysis and sharing. This securitization leaves little room for CSOs to contribute to these efforts. Traditionally, CSOs role is limited to simplifying legal terms and rebuilding communities post-terrorism events. And yet, their insights from the grassroots level are invaluable for more localised and effective CFT measures. However, the role of CSOs in CFT

efforts is often marginalised. Many CSOs, HRDs, and activists face overwhelming compliance burdens, are criminalised due to vague definitions of activism, and are excluded from key discussions and capacity-building programs.

De-risking and Financial Exclusion

Financial institutions face pressure to comply with national laws and FATF standards, leading to de-risking practices that disproportionately affect Non-Profit Organisations (NPOs). Unfortunately, these rule-based approaches often adopt a “one-size-fits-all” model that fails to account for sector-specific needs. Even when NGOs have strong internal systems and policies to mitigate the risks of terrorism financing, they still face challenges, as financial institutions often do not consistently apply a risk-based approach to monitoring their activities. This prompted a call for Africa to develop its own CFT standards, inspired by the European Union’s frameworks, to better fit the continent’s unique socio-political landscape. Additionally, there was a push to rethink current de-risking practices, as excluding NPOs from the formal banking system could push them into informal financial channels, which carry a higher risk of terrorism financing abuse and could worsen the very issues these regulations aim to solve.

Countering the Financing of Terrorism in Sub-Saharan Africa: Mitigating the Unintended Consequences

The heightened scrutiny that comes with CFT regulations has also had a significant impact on NPOs’ ability to access funding. The complex due diligence processes often lead to delays in project implementation, affecting both the organisations and the communities they serve. To address these issues, it was proposed; Risk assessments should be conducted regularly by governments and financial institutions, ensuring they are context-specific to avoid overly restrictive CFT measures.

CFT regulations must respect human rights and be subject to judicial oversight. Transparency is crucial, with regular reports on the impact of these measures and independent reviews to prevent human rights violations. Continuous engagement with civil society is essential, allowing CSOs to actively contribute to the development of CFT policies.

Training for law enforcement and financial institutions on human rights is necessary, while CSOs need support in complying with CFT requirements.

The Securitization of Civic Space in Uganda, Mozambique, Eswatini, Tanzania, Kenya, and Zimbabwe: Emerging Trends, Patterns And Impact.

This preliminary study explored the securitization of civic space across the six countries, showing recurring and similar patterns especially;

- Deregistration of NGOs.
- Financial sanctions, including asset freezes and confiscations.
- Cancellation of public meetings and protests under the guise of national security or terrorism concerns.
- Labelling and branding demonstrators as enemies of the state.
- Restriction of communication and freedom of speech.
- Speech acts, executive decisions without due process or not following the law.
- Increased funding of the military.
- Legislative Reforms: Several restrictive laws have been developed/ammended.

The findings reveal a concerning trend towards the securitization of civic space, which increasingly restricts the rights and operations of CSOs in these regions. This issue warrants further investigation, and it is hoped that this research will serve as a baseline for ongoing dialogue about the implications of securitization.

Looking Ahead

Civic Advisory Hub, Defenders Protection Initiative, and Spaces for Change aim to continue to advocate for a balanced approach to CFT efforts that uphold civil liberties while effectively addressing security concerns. By fostering a more inclusive and context-sensitive approach to CFT, these efforts will empower CSOs in their critical role in countering terrorism financing, safeguard civic space, and uphold human rights. It is also hoped that the preliminary findings of the securitization study will help advance the dialogue on its proliferation and spark efforts to explore effective strategies for mitigating its adverse effects.

Introduction and Background

Global terrorism threats remain high, and a crucial element in combating these threats is disrupting their financing. In response, numerous states and international bodies have implemented various Countering the Financing of Terrorism (CFT) measures, including stricter policies, robust legal frameworks, increased due diligence, administrative controls, and prompting financial institutions to de-risk.

While these measures are well-intentioned, they have inadvertently imposed significant burdens on Civil Society Organizations (CSOs), such as NGOs, CBOs, HRDs, and activists, restricting their ability to operate effectively and freely.

The Sub-Saharan Africa Civil Society CFT-Conference, held on August 5-6, 2024, brought together over 140 delegates from across Africa, representing the not-for-profit sector, academia, Financial Intelligence Units (FIUs), regulatory authorities, Financial Action Task Force (FATF) Regional Style Bodies, African Regional Economic Communities (RECs), and Regional Mechanisms (RMs). The purpose was to discuss how, through collaboration, we can counter the financing of terrorism while safeguarding civic space within Sub-Saharan Africa.

This report outlines the proceedings of the event.



Opening Remarks



Ms. Hilder Achiro | Programs Executive, Defenders Protection Initiative (DPI)

Distinguished guests, esteemed delegates, and friends of civil society,

On behalf of the Defenders Protection Initiative (DPI), I would like to welcome you to the Sub-Saharan Africa Civil Society CFT-Conference. This gathering, the first of its kind, brings together representatives from over 20 countries across our vibrant continent.

As we convene today, we are reminded of the ever-evolving nature of terrorism and its transnational reach. The challenge of countering the financing of terrorism (CFT) demands that we stay ahead, constantly adapting and refining our approaches. Across Africa, numerous laws and mechanisms have been enacted in response to this threat. However, these measures have at times unintentionally hindered the vital work of civil society organisations (CSOs) despite the key role that CSOs play in Countering the Financing of Terrorism (CFT) in different aspects; sensitisation, capacity building, research and many others.

During this two day engagement, it is our hope that we nourish our existing partnerships, build new bridges of trust, and collaborate more effectively than ever before to realise this conference theme; Together, Countering Financing of Terrorism (CFT) while Safeguarding Civic Space in Sub-Saharan Africa.



Ms. Victoria Ibezim Ohaeri | Executive Director, Spaces For Change

It is profoundly significant that we are convening this discussion on Countering the Financing of Terrorism (CFT) here on the African continent, rather than in Western countries as has often been the norm. From Ghana to Kenya, and now in Uganda, we are seeing an important shift, bringing these critical conversations closer to home.

When we speak of safeguarding civic space, what does it truly mean? At its core, it involves countering the shocks and stresses that threaten the very foundation of our civic freedoms.

While NGOs are traditionally established to engage in social and charitable work, the reality today is far more complex. The daily operations of NGOs now involve navigating compliance requirements: reporting, registering, certifications, sanctions training, financial reporting, and the filing of annual and tax returns—often with multiple regulators and under intense scrutiny.

These administrative burdens, though sometimes necessary for ensuring financial integrity, often have little to do with the humanitarian and charitable missions that NGOs set out to accomplish. For smaller Community Based Organisations, in particular, these requirements can be overwhelming, detracting from their core work and stretching their already limited resources.

As we gather here, I urge my fellow delegates to seize this opportunity to explore the delicate balance between regulatory oversight and the operational realities of NGOs. We, as CSOs, seek to carry out our vital work with minimal to no disruption, while understanding that authorities have a responsibility to monitor these activities. Our challenge, and our opportunity, lies in finding a common ground where both parties can complement each other's efforts.

Let this conference serve as a platform for fostering greater understanding and collaboration, ensuring that while we strengthen our defences against terrorism financing, we also protect CSOs.

Opening Remarks

Mr. Moses Ogwapus | Vice Chairperson Uganda AML/CFT/CPF Task Force and Commissioner Financial Services MoFPED

The government recognizes civil society as a vital partner in the fight against Terrorism Financing (TF), a transnational and ever-evolving threat. Uganda was recently on the FATF grey list, which led to increased business costs, sanctions, and restrictions. Thanks to the collaborative efforts of Ugandan CSOs, alongside government actions, we successfully exited the grey list. While the steps taken to achieve this may have impacted civil society, this was never the intention.

The National Risk Assessment (NRA) conducted by the Financial Intelligence Authority has informed strategies for a risk-based approach to monitoring NGOs. Additionally, a Regulatory Impact Assessment was conducted to ensure future legislation does not constrain civil society activities. Furthermore, we are in the process of amending the AML Act to remove NGOs from the list of accountable persons.

We urge CSOs to join us in raising public awareness about the significance of CFT.



Mr. Samuel Were Wandera | Executive Director, Financial Intelligence Authority, Uganda (Written Address)

It is an honour to be here this morning, and I extend my gratitude to the Defenders Protection Initiative and Civic Advisory Hub for organising this conference. Your presence underscores our shared commitment to combating money laundering and terrorism financing while ensuring the integrity and security of our financial systems and protecting NPOs from abuse.

This conference in Kampala offers us a unique opportunity to exchange knowledge and strengthen our collective efforts in Sub-Saharan Africa. Uganda's recent exit from the FATF Grey List is a testament to the collaborative work of all stakeholders, including the NPO sector.

You will hear about Uganda's measures to combat terrorism financing, particularly in light of our geopolitical risks. Our work with NPOs is critical, as global evidence shows they are vulnerable to abuse for terrorism financing. A Terrorism Financing Risk Assessment for the Non-Profit Organisations Sector in Uganda released in May 2023 indicated that the risk for NPOs in Uganda is low. Based on this, Uganda has decided to amend the AML Act 2013 to remove NPOs as accountable persons, reflecting our commitment to both national security and the protection of the NPO sector.

I encourage open dialogue and active engagement throughout this conference, as we seek to build stronger ties and develop innovative solutions to benefit our countries and the global fight against terrorism financing.

Welcome to Uganda, and I wish you a productive and enriching exchange of knowledge and experience.





***SCP Waswa David | Director Counter Terrorism Directorate,
Uganda Police Force***

With the rise of advanced technologies and new systems like cryptocurrency and Artificial Intelligence, the task of Countering the Financing of Terrorism (CFT) has become increasingly challenging. Additionally, factors such as high unemployment among the educated and a rapidly growing population present new and complex challenges.

We have lived with the threat of terrorism for years, but with changing tactics and recent attacks, such as those near the eastern Democratic Republic of Congo (DRC) border, new laws and amendments have been enacted to address these evolving threats. Various mechanisms, specialised entities, regional economic communities (RECs), and law enforcement agencies have been established. We've signed regional and international protocols, trained forces, and even enhanced strategies like community policing. Yet, the threat persists.

Traditionally, combating terrorism has been seen as the sole responsibility of the police and the state. However, it is crucial to recognize that this is a shared responsibility. We must devise approaches that involve everyone. CSOs are taking bold steps in fighting terrorism financing through awareness, rehabilitation, partnerships, and coordination, proving themselves as key partners in this battle.

Terrorism and its financing cannot be fought in silos. This conference is a significant step in the right direction. With the presence of CFT experts, government representatives, law enforcement agencies, and CSO leaders from across the Sub-Saharan region, we have a unique opportunity to learn from one another, share experiences, and develop a collaborative and balanced approach to combating terrorism and its financing. I am especially pleased to see partners like IGAD, which has played a crucial role in helping us understand and implement soft approaches to CFT.

Thank you, and let us remember that we have a collective responsibility. We must understand our roles and fulfil them rightly.

Special Remarks



***Mr. Christopher Suna Kayoshe | Acting Head of Disarmament,
Demobilization, Reintegration and Security Sector Reform Division
– African Union***

Terrorism threats are collective. The security of one state cannot be separated from another; the security of our continent is indivisible. Our countries are interconnected, and so are the threats we face.

The tactics and operations of terrorist groups have also evolved. They are now attempting to occupy ungoverned spaces. The question arises: Is this due to a lack of government systems or inadequate enforcement? Ultimately, terrorism is a social issue, and the idea of separating state systems from CSOs is misguided. The most crucial component in this fight is the population, essentially, the civil society.

We must recognize that we share the same infrastructure and financial systems, making it essential for CSOs to collaborate, share information, and work closely with states. Just as terrorist groups cooperate, so must we.

Meetings like this one should produce roadmaps that guide RECs and states in developing concrete mechanisms for (CFT).

I look forward to our discussions and collaboration.

Contemporary Outlook: CFT Eco System at a Glance



Mr. Yona Wanjala – Executive Director, Defenders Protection Initiative, Advisor - Civic Advisory Hub

There is no doubt that terrorism is a problem on the African continent. There is a heavy presence of terrorist groups like ISIS, Al-Shabaab and several others who aim to kill non-combatants, destroy the life of non-combatants and create fear into the public.

These groups and their activities have the ability to influence government policy as evidenced by the U.N. Security Council Resolution 1373, passed just two weeks after the 9/11 attack. Subsequently there have been several more resolutions, bodies, policies and mechanisms that have come up all with the aim of countering terrorism even in Africa.

These mechanisms however well intentioned have affected operations of NGOs and this greatly stems from their misapplication. And yet all through this, civil society actors are seen as peripheral actors without any meaningful contribution to security dialogue except abiding and complying to set policies.

“But we are saying, in countering terrorism and its financing, states cannot do it alone. Policies and ideas are crafted and sent to us, but often, we are asked to accept and implement concepts we don’t fully understand.”

Despite progress in seeking African solutions to African problems, the focus remains heavily on militarised approaches, which has led to the securitization of civic space.

NGOs are proposing more soft approaches like deradicalization, reaching out to victims of violent extremism, and more importantly addressing the root causes like deficits in good governance, rule of law and democracy.

PLENARY: Session II

Debating inclusivity, openness and transparency in Regional Economic Communities frameworks of countering Terrorism Financing in Sub-Saharan Africa.



QN: *Highlighting the successes and challenges of working with the regional bodies working on counter terrorism financing. How have regional bodies shaped counter-terrorism financing policies to address the unique needs of our region, rather than merely adopting global norms?*



Ms. Elizabeth Mutunga | Head Governance, Peace and Security- COMESA

Ms. Mutunga highlighted the various forms of support COMESA has provided to member states, including:

- Strengthening law enforcement agencies to trace illicit funds, prosecute financial crimes, and recover assets.
- Supporting interagency collaboration.
- Guiding member countries in reviewing their laws and developing guidelines for the effective interpretation and implementation of AML/CFT regulations.
- Sensitising civil society and reporting entities on money laundering (ML) and terrorism financing (TF).
- Most notably, COMESA has implemented an early warning system called COM1. Unlike other REC early warning systems, COM1 prioritises identifying the structural factors of conflict to strengthen resilience against, terrorism and violent extremism.

"The laws are actually very stringent and unfortunately when laws are so stringent, it is so much easier to abuse them, it is so much easier to weaponize those laws because they are complex and they are very, very tough."

Elizabeth Mutunga | COMESA

QN: *EU is able to assert a lot of influence on its members. They shape the policies of their members, influence compliance of their members, ensure that their members are adhering to certain principles that they've put forward for their region. Why are we not seeing that counterpart influence in the African Union?*



Mr. Christopher Suna Kayoshe | Acting Head of Disarmament, Demobilization, Reintegration and Security Sector Reform Division - African Union

Mr Kayoshe shared that there are indeed efforts being made to enhance state systems, particularly through intelligence sharing between member countries, as terrorist groups often collaborate. Initiatives like the Nouakchott and Djibouti processes promote this cooperation. Additionally, AFRIPOL, the African Union's equivalent of INTERPOL, ensures close coordination among member states, with established structures for reinforcement when needed.

However, he noted that addressing terrorism financing is particularly challenging because certain groups are deeply localised and often act as political players within their own countries. Additionally, they establish familial ties, which complicates the response. For example, a fighter from Mali might have children in Chad and then move to Cameroon. By the time one individual is prosecuted, there is an entire family left behind, making the situation even more complex.

Kayoshe emphasised that strengthening police cooperation through AFRIPOL is one of the most effective strategies, particularly in coordination with Financial Intelligence Units (FIUs). Additionally, coalition forces like the Multinational Joint Task Force (MNJTF) are crucial, with several armies working together to combat specific terror groups like Boko Haram.

QN: *In these strategies, do you believe civil society was sufficiently engaged, or were they handed solutions they didn't fully understand? Could you comment on the inclusivity and transparency of those processes?*



Dr. Martha Njiri | Head of Strategic Communication-IGAD

As far as inclusion of civil society is concerned, Ms Njiri called to mind that historically civil society was never included from the start, even when the FATF conversation was being held. However, the IGAD Centre of Excellence for Preventing and Countering Violent Extremism, which is under the umbrella of IGAD Peace and Security, was formulated partially to address the issue of inclusion of civil society.

The centre's vision is to see the reduction of the violent extremism threat in the region, through bringing together state and non-state actors, and civil society, to develop and to implement coherent strategies towards countering violent extremism.

Dr. Njiri noted that the discussion on CFT has not received the attention or platform it deserves, given the severity of the issue. She highlighted the opportunity for IGAD to elevate this conversation further, starting from this point.



Last year IGAD held the first regional convening on frameworks for countering violent extremism and financing of terrorism, and now thanks to this conference that is aptly timed, we will be able to bring to our member states key recommendations of how to and why we need to include the civil society.

The Civil Society Perspective: How Exclusion from Pertinent CFT Processes Affects CSOs - A case of Ghana.

Ms. Omolara Balogun | Head, Policy Influencing and Advocacy, West Africa Civil Society Institute



Ms. Omolara shared that the West Africa Civil Society Institute (WACSI) became involved in countering terrorism financing processes in 2015 when Ghana was preparing for a mutual evaluation coordinated by GIABA. Initially, WACSI was unaware of the process's importance, but soon realised that failure to engage could severely impact their work.

In early engagements with Ghana's Financial Intelligence Centre (FIC), initial involvement felt tokenistic with the government's primary focus being on larger sectors like real estate and banking, but through continuous engagement and education, they began to better understand FATF processes and their implications. They extended this knowledge across the region, finding similarly low capacity in neighbouring countries. To address these challenges, WACSI partnered with International Centre for Non-Profit Law (ICNL) to develop a toolkit simplifying these concepts for CSOs.

Ms. Omolara also pointed out the difficulties CSOs face, such as restrictive regulations that governments implement to meet international standards, often without considering their negative impact on the sector. She emphasised the importance of meaningful involvement of CSOs in these processes and the need to balance regulatory requirements with the operational freedom of civil society.

Although progress has been made, with both CSOs and governments taking steps to enhance their collaboration, there is still a long way to go."

Strengthening CSO Involvement in CFT: A Case of East Africa



Mr. Henry Muguzi, Executive Director, Alliance for Finance Monitoring

According to the Alliance for Finance Monitoring Executive Director, there appears to be a regulatory mismatch in East Africa when it comes to countering terrorism financing. Despite compliance with FATF standards, terrorism continues to rise. He highlighted that while the AU has a comprehensive political framework and instruments to combat terrorism, enforcement remains weak, and there is an over-reliance on security measures rather than addressing the socio-political and economic and root causes of terrorism.

According to Muguzi, civil society is often seen merely as an accountable party that must comply with regulations, rather than as a key player in combating terrorism financing. He recounted how, in Uganda, CSOs were not fully engaged in these processes until a wake-up call in 2020 when some CSOs had their bank accounts frozen over suspicions of financing terrorism. This incident underscored the need for civil society's active involvement in understanding and addressing the political and economic factors driving extremism, such as bad governance.

He argued that civil society is closest to the citizens and, therefore, crucial in mobilising and sustaining efforts to combat terrorism and terrorism financing.



Without the engagement of civil society, efforts to counter terrorism will be insufficient, as the issues often stem from within the communities themselves.

QN: *What roles have CSOs, as the closest link to citizens, played in deflecting radicalization, countering violent extremism, and combating terrorist propaganda in our communities and countries?*

Mr. Monametsi Sokwe, Executive Director, Southern African Council of NGOs



In Southern Africa, terrorism was generally regarded as something that happens in East, West Africa and the Middle East. Which contributed to a lot of sort of relaxation on the part of our state parties- **Sokwe opined.**

Before the Cabo Delgado insurgency in Mozambique began in 2017, Southern African governments had limited responses, and even then, they were primarily militaristic, excluding civil society from involvement. This lack of engagement persisted despite civil society's previous success in conflict resolution, such as with SADC and the Eswatini Government.

The citizens of Mozambique, particularly in Cabo Delgado, were aware of the brewing conflict, but the government's failure to engage with them or address early warning signs likely contributed to the scale of the violence. Since then, CSOs have played a crucial role in countering terrorism financing (CFT) by collecting and sharing data from communities with authorities to help craft preventive measures.

In his final remarks, Mr. Sokwe warned regulatory authorities that while they focus on scrutinising NGOs' bank accounts and imposing administrative hurdles, they risk overlooking emerging risks, such as new financing models like cryptocurrency and the growing influence of Artificial Intelligence (AI).

Summary of Discussion and Key Recommendations



- **Incorporate Religious Leaders and educators** in CFT dialogue to address ideological factors effectively.
- Efforts should prioritise **community-driven strategies** rather than focusing solely on individuals or weapons. Terrorism is deeply rooted in communities, so engaging grassroots efforts is key to combating terrorism financing (TF).
- **Leverage CSO Expertise:** CSOs like Security ONE UP are making significant progress in disarmament and peacebuilding.
- **Address Localised Terrorist Financing:** Terrorist activities are often localised, with substantial funds channelled through local enterprises.
- **Expand CFT Mechanisms beyond formal financial channels:** Current CFT mechanisms are heavily focused on the banking sector, overlooking other financial channels prevalent on the continent.
- **Update Counterterrorism Strategies:** Conventional bombings are less common; terrorism now often involves business channels. Reevaluate approaches to address these new tactics.
- **Promote Democracy and Inclusiveness:** Deficits in democracy, equity, and inclusiveness contribute to TF and its financing, highlighting the need for good governance practices.

<ul style="list-style-type: none">• Why are religious actors often excluded from discussions on CFT given the role of religion in this context?• Should Africa begin focusing on producing its own security technologies, rather than relying on imports ?• With national laws often falling short, how do we navigate the implications of relying heavily on international laws and avoid being greylisted?	<ul style="list-style-type: none">• What are the unique African approaches to CFT?• Why are terrorism threats and attacks more prevalent in underdeveloped countries compared to developed ones?• Do we share a common definition of terrorism, and can we assume that both governments and civil society always act with good intentions? What if some states themselves are complicit in terrorism?
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



PLENARY: Session III

Appraising the Enforcement and Accountability Mechanisms, Processes and Procedures of Regional Security Agencies in the Quest Against Terrorism Financing.

Moderator: Ms. Alma Wanyama | Senior Technical Advisor – EU AML-CFT ESCAY



QN: *In what ways do enforcement bodies support member countries to fight terrorism and terrorism financing?*



Mr. Africa S Apollo | CEO EAPCCO/ Interpol General Secretariat

Mr Apollo highlighted 3 major roles EAPCCO plays in supporting member countries to counter terrorism and terrorism financing.

- **Standardisation of mechanisms and procedures** of how to handle crime, including terrorism and financing of terrorism. Given the socio-political diversity of the 14 member countries and the transnational nature of terrorism and its financing, EAPCCO works to standardise how different countries should approach the prevention and, most importantly, the investigation of crime. This includes standardising procedures for processing witnesses, victims, and evidence across various jurisdictions. Interpol/EAPCCO provides guidelines on how evidence should be handled and how information should be exchanged.
- **Capacity building:** Imparting skills, knowledge, equipment, and tools to law enforcement officers across different jurisdictions to ensure they all have the same capacity to handle such investigations.
- **Partnerships and Collaborations:** Engaging with CSOs, NGOs, Faith-Based Organisations (FBOs), and other international organisations to support capacity building for our member countries. This collaboration aims to provide skills, knowledge, equipment, and tools necessary for effectively handling transnational organised crime.

Mr. Sello Moerane | Head of INTERPOL Regional Bureau of Harare for Southern Africa

Mr. Mosane outlined the key ways in which INTERPOL (Regional Bureau of Harare for Southern Africa) supports member countries in combating terrorism and its financing, including:

- **Intelligence Analysis:** INTERPOL assists member countries in dissecting and connecting the dots regarding how individuals and groups commit acts of terrorism, engage in kidnapping for ransom, and participate in other elements of international criminal markets. The organisation helps uncover the value and benefits perpetrators derive from these activities.
- **Capacity Building:** INTERPOL provides member states with global tools and databases that extend their capabilities beyond regional boundaries. These resources enable coordination with judicial bodies, financial regulators, and platforms such as the IMF and FATF, ensuring a comprehensive approach to combating transnational crime.
- **Awareness and Training:** INTERPOL sensitises member states, including the CSO sector, on issues related to the property market and conveyance sectors, which pose significant challenges for monitoring and exiting Grey Lists. The property market is linked to substantial, often unmeasured financial flows, creating major challenges for law enforcement.



Mr. Moerane concluded by challenging civil society, stating that geopolitical tensions, illegal migration, climate change, and political instability also contribute to terrorism financing and other transnational crimes. He called on NGOs and NPOs to explore ways in which they can contribute to addressing the issue of state-embedded actors in facilitating terrorism financing and ensuring organised crime does not thrive on the continent.

QN: *Given that many investigations into serious crimes such as TF are intelligence-led. At what point do you de-securitize to include CSOs without compromising intelligence? What are the risks associated with de-securitizing these investigations at the formative stage, and at what point should de-securitization occur?*

Mr. Sello Moerane | *Head INTERPOL Regional Bureau of Harare for Southern Africa*

Countering terrorism involves three key stages: prevention, response, and recovery. The prevention stage is highly de-securitized, as it should be community-led, focusing on grassroots efforts to address the root causes of extremism. When prevention fails and a response is necessary, this phase becomes securitized, led by security officials to combat those who employ indiscriminate violence against unarmed civilians. The recovery stage, which involves healing—both physical and emotional—as well as rebuilding communities through medical, agricultural, and other essential services, is again highly de-securitized, emphasising community and humanitarian efforts.



Dr Sylvia Auma | *Directorate of Interpol and International Relations, Uganda Police Force*

Dr. Auma highlighted three key components guiding the de-securitization of intelligence in counter-terrorism efforts:

- **Screening Process:** Information/intelligence are carefully screened and analysed to identify key insights. Depending on the level of screening, other stakeholders, including CSOs and NPOs, are consulted and involved in the process, which helps to de-securitize the information.
- **Legal Framework:** National laws increasingly recognize and incorporate the role of civil society organisations. The interpretation of these laws and how they are applied are crucial in determining when and how to de-securitize intelligence, thus shaping the overall approach to handling and sharing information.
- **Standardised Systems:** The intelligence gathering, forensic investigations, and control delivery systems are all conducted according to internationally approved standards that prioritise human rights, further supporting the de-securitization process.





Ms. Zaina Kombo | Campaign Manager, Equality and Antidiscrimination- Amnesty International, Kenya

Ms. Kombo outlined the complementary roles CSOs play in combating the financing of terrorism, emphasising the following:

- **Advising Government and Security Agencies:** CSOs work closely with communities, earning their trust because they are deeply engaged at the grassroots level. This proximity enables CSOs to provide valuable insights and advice to government and security agencies.
- **Simplifying and Translating Laws:** Simplifying legal language and translating legislation into terms that communities can easily understand ensures that laws are not merely imposed but are understood by the people, particularly those who may not be familiar with English or legal jargon.

However, she highlighted a significant challenge in the broad definitions found in legislations like Kenya's Prevention of Terrorism Act, 2012. For instance, the term "terrorist act" is defined so broadly that it could encompass acts like robbery with violence, potentially leading to misinterpretation and misuse of the law.

Kombo urged for the contextualization of laws, policies, protocols, and conventions to ensure they are appropriate for the communities they are meant to serve, warning that without this, such laws could be abused and used to suppress. She noted, "The way terrorism is manifests in Somalia, is not the same way it manifests in Niger or Kenya."

QN: What do you consider as the complementary roles, risks and challenges of NPOs combating the financing of terrorism in your area of jurisdiction?

Ms. Sally Maforchi Mboumien | Executive Director, Common Action for Gender Development

Ms Maforchi highlighted that the assumption that CSOs can play a complementary role in countering terrorism financing (CFT) is flawed if they lack capacity and access. Beyond simplifying and interpreting laws, CSOs also support and sustain government initiatives in CFT. They hold governments accountable for human rights violations, ensuring that interventions are human rights-led and people-centred.

However, in practice, many CSOs, HRDs, and activists face significant challenges. They are often burdened by excessive compliance requirements, criminalised due to vague definitions of activists and HRDs, and excluded from discussions and capacity-building programs on CFT by states and RECs. This undermines their ability to effectively complement CFT efforts.

In her closing remarks, Ms. Maforchi urged: "We need to enhance collaboration between CSOs and law enforcement officers if we are truly committed to countering terrorism and terrorism financing." efforts.





Q&A

QN: *There is a tendency for Counter-Terrorism (CT) frameworks and implementing bodies to be misused by states under the guise of intelligence operations, raising concerns about the integrity and reputation of these intelligence agencies. How do law enforcement agencies galvanise themselves against political influence?*

A: Mechanisms like the FATF standards apply broadly, not just to civil society but also to politically exposed persons (PEPs). Specifically, Recommendation 12 outlines targeted measures that countries must implement to monitor and address the risks associated with PEPs. This recommendation begins with the head of state, emphasising the importance of oversight at the highest levels of government.

Diphat Tembo, Director Compliance and Prevention - FIC Zambia

QN: *The U.N. Security Council passed Resolution 250 on addressing radicalization and extremism among young people. Given the active voices of youth, particularly in civil society across countries like Kenya and Uganda, what measures are you taking to ensure that their inclusion is effective throughout this process?*

QN: *What initiatives are in place to address the use of emerging technologies in financing terrorism, given the current focus seems primarily on local financial institutions?*

A: We are living in a digitally native society where more than half of the African population is youth. The challenge is how to involve young people in systems that counter terrorism financing while utilising their skills and technology. In the SADC, we are working on integrating various sectors to harness regional strengths. Interpol is supporting this with a sophisticated innovation centre in Singapore and has deployed regional cyber specialists across Africa to lead discussions on cyber and digitalization issues in counterterrorism efforts.

Sello Moerane | INTERPOL Regional Bureau of Harare for Southern Africa

QN: *The stages of countering terrorism that were shared appear idealistic. In reality, when de-securitization occurs and CSOs take over, they often become re-securitized, creating what seems like a never-ending cycle of securitization. How do we break this cycle?*

A: What the gentleman referred to as a vicious cycle of securitization is actually known as double victimisation. This is a significant problem, especially when law enforcement is not professional enough or is influenced by politics, as was mentioned earlier. Double victimisation occurs when victims of terrorism or serious organised crime are treated as if they willingly committed the crimes. This is a major issue that both national and regional law enforcement agencies must address.

Africa S Apollo | CEO EAPCCO/ Interpol General Secretariat

QN: *What mechanisms are in place to monitor and regulate the financial activities of politicians given the close relationship between politics and money laundering?*

Many have been reported to fund their campaigns with large sums of money that are unaccounted for.

A: As far as politics, money laundering are concerned, it's a complex issue. However, as an international organisation, we acknowledge that we haven't fully engaged civil society in finding solutions. Currently, through the Global Initiative Against Transnational Organized Crime (GITOC), there's an ongoing process to map out a global strategy. This includes all regional economic bodies, political players within the region, and the African Union, aiming to develop a global policy addressing transnational organised crime, its connection to digital financing, and identifying the beneficiaries.

Sello Moerane | INTERPOL Regional Bureau of Harare for Southern Africa

PLENARY: Session IV

Examining the drivers, risks and challenges of de-risking, financial exclusion and financial inclusion.

Moderator: Ms. Leah Mitaba | ED Zambia Council for Social Development



QN: *What legal frameworks guide banks in decisions related to de-risking, financial exclusion, and inclusion, particularly concerning the laws governing the freezing and unfreezing of NGO*



Mr. Haider Dingomar | ABSA Bank Mozambique

Mr Haider clarified the act of freezing and unfreezing of customer accounts simply a strategy that banks use to manage or to recognize the risk and to adopt proportionate measures to address risk.

In addition to this the banking sector follows a complex legal and regulatory framework. And furthermore it follows the non-binding rules that include the international standards; AML regulations, Quality Assurance requirements, data protection and privacy laws, financial inclusion and third party and loan practices, among other industry and best practices which Haider pointed out, "make our job as compliance officers very difficult."

These rule-based approaches have challenges because they do not consider the sector -specific need as they tend to be "one size fits all."

Banks have tried to address this risk rating for each client at the time of forming the business relationship.

The client must be risk rated which means correct and reliable information must be given to banks to allow assigning of specific risk level to that specific client."

This risk level or risk rating then informs the type of measures that banks adopt to transact with that specific client during the entire lifecycle of the relationship.

In his concluding remarks Mr. Haider highlighted that financial exclusion is sometimes a result of implementation of the de-risking measures adding that bankers therefore have an extra responsibility to train their employees to understand specific needs of each client over and above with each type of risk level. Otherwise, banks will unintentionally end up promoting financial exclusion rather than financial inclusion/improvement

Mr. Katto Hassan Muwonge | Senior Manager Compliance, Stanbic Uganda

QN: *What factors determine the maximum amount a client can hold in a bank account, and what criteria are used to flag transactions as suspicious? Additionally, who has the authority to decide when or which accounts should be frozen—is it solely the bank's decision, or is there validity to the claims of political influence? Should de-securitization occur?*

Mr Katto categorically stated that banks do not have the authority to freeze accounts, adding that the AMLA (2013) bestows this power on the FIA, which then directs the financial institutions. Aside from that, bank accounts can also be frozen under the following circumstances:

- **By court order.**
- **By directive from the Central Bank.**
- **By customer initiative.**
- **When it is in the best interest of the bank, for example, when fraud is detected.**





Ms. Sola Olutayo | Spaces for Change, Ghana

Contrary to Mr. Haider's assertion that banks aim to maintain relationships with clients, Ms. Olutayo argued that the very definition of de-risking often leads to the termination of client relationships.



The phenomenon of financial institutions terminating or restricting business relationships with clients or categories of clients to avoid, rather than manage, risk.

FATF Vice-President Je-Yoon SHIN | Tokyo, 10 March 2015

Speaking on the Ghanaian CSO experience, the ecosystem has become more stringent due to multiple layers of compliance. For instance, NGOs are required to obtain an auditor at registration and then present an auditor's letter to the bank before opening an account, even though this has already been addressed with the regulatory body. These compliance requirements impose financial burdens on organisations, particularly affecting grassroots NGOs struggling with limited funds.

Despite having their own internal systems and policies to mitigate terrorism financing risks, NGOs face challenges as a risk-based approach to monitoring is not consistently applied, contrary to FATF recommendations.

Mr. Onesmo Paul Olengurumwa | National Coordinator Tanzania Human Rights Defenders Coalition

Mr Onesmo outlined the steps NGOs in their network in Tanzania had to follow after their accounts were frozen. He shared the process they undertook to regain access to their frozen accounts, which included:

- Engaging in administrative dialogue with both the banks and regulatory authorities.
- Conducting a self-risk assessment.
- Securing competent legal counsel to strengthen their position in the process.
- Campaigning among stakeholders to raise awareness of the injustice until a resolution was achieved.
- Continually monitoring the bank balance after accounts were unfrozen to ensure accuracy.

Onesmo emphasised the importance of ongoing discussions on finding a balance between combating terrorism financing and money laundering while also protecting human rights and civic space. Given that this is a global issue, he stressed the need to prevent CSOs from becoming targets under FATF Recommendation 8.



Mr. Emilio Jose Manuel | President, Lusophone Platform for Human Rights

NGOs in Angola face strict regulations due to concerns about inadequate controls over money laundering and terrorist financing, as most receive funds from international donors. For instance, some organisations were barred from accessing funds for over 12 months without official communication.

"Ironically, many of these donors are also supporting the Angolan government", Manuel opined.

Angola has yet to conduct a risk assessment for the NGO sector, which is crucial for addressing these issues and should be a priority for NGOs together with the citizens.

Mr. Manuel concluded by urging financial institutions to maintain open dialogue with NGOs. He emphasised that banks should provide official letters and clear justifications when organisations are denied access to their funds.



Q&A

QN: Why do banks favour derisking over having a dialogue with the NPO sector. Who should bear the cost of going to court?

A: Some NPOs fail to disclose crucial information, particularly regarding the source of funds and donor details. This lack of transparency leaves banks unable to defend these organisations, leading them to choose de-risking.

QN: Don't banks have a duty to inform NPOs of an order to freeze their accounts and notify customers in advance?

A: Banks are prohibited from tipping off customers, with severe penalties for doing so, including fines up to 1.4 billion Ugandan Shillings and up to 14 years of imprisonment. However, banks will attempt to verify documents and query suspicious transactions. They strive to engage with the customer as much as possible. When it comes to closing an account, banks are required to provide a 14-day notice before taking any action.

Additional Issues & Recommendations

- The primary problem is the lack of communication from banks to NGOs, leading to significant ripple effects and a lack of consideration for human rights.
- When banks de-risk, NGOs are forced out of the formal banking system and may resort to the informal financial sector. This sector is less secure, potentially illegal, and poses a greater risk for terrorist financing abuse. This approach needs to be re-evaluated.
- There is a need for ongoing dialogue on beneficial ownership, especially since these are public organisations, not natural persons. NGOs should not be burdened with the requirement to submit beneficial ownership information.
- There is a need for a consistent approach to AML and CFT measures across the board.
- It is crucial for African countries to establish their own standards, drawing inspiration from the EU, and encouraging collaboration and adaptation tailored to our unique context.



DAY 2

PLENARY: Session V

Countering the Financing of Terrorism in Sub-Saharan Africa: Understanding and mitigating the Unintended Consequences.

Moderator: Mr. Oyeibisi Babatunde Oluseyi | ED - Nigeria Network of NGOs



QN: *In your experience, what are some of the practical challenges posed by the greylisting phenomenon in countering the financing of terrorism while safeguarding the civic space?*

Mr. Bright Besigye | *Manager International Relations, FIA-Uganda*



While Uganda was removed from the FATF grey list, the country remains on the European Union's blacklist, indicating that some deficiencies persist in its AML/CFT regimes, according to Mr. Besigye.

Besigye explained that being on financial grey or black lists has significant consequences, including increased scrutiny due to the country's high-risk status, financial isolation from global markets and institutions, and reputational damage. These issues affect the entire country, including the NPO sector, which faces not only heightened scrutiny but also difficulties in sourcing funds since Uganda is considered high risk.

He acknowledged the challenges NPOs face with banks, attributing these to strict banking laws enacted to meet international standards, which increase compliance requirements for NPOs.

In his concluding remarks, Besigye emphasised that despite being removed from the grey list, Uganda is still considered non-compliant with FATF Recommendation 8 and this could have a cascading effect on the NPO sector adding that this need to be addressed ahead of the 2028/29 assessment. Besigye concluded by urging NPOs to understand the regulators' perspective and called for collaboration and vigilance among all stakeholders to ensure Uganda exits the EU blacklist and avoids reinstatement on the FATF grey list.

Mr. Diphat Tembo | *Director Compliance and Prevention Department, FIC-Zambia*

Building on the effects of grey/blacklisting on civic space, Mr. Tembo highlighted several major issues. First, NPOs face significant challenges in accessing funding because the country is highly scrutinised. Donors, their sources, affiliations, and the donor country's status on sanctions lists must be thoroughly examined, which can stall the operationalization of NPO projects.

Secondly, this heightened scrutiny also affects beneficiaries, as heightened Know Your Customer (KYC) and due diligence processes must be conducted, leading to potential delays in project execution.

Tembo attributed the root cause of grey/blacklisting to a lack of understanding of FATF standards, specifically Recommendation 8, and how it should be applied. He pointed out that peer review evaluations often misinterpret the standards, leading to undue pressure on CSOs when their countries are placed on these lists.

"When assessors come to your country, it's crucial to be familiar with them and the procedures. For example, the assessors for Recommendation 5, which criminalises TF, should not be the same as those for Recommendation 8, which focuses on protecting NPOs against TF risks," Tembo advised.



QN: *How are you working with civil society to complement your efforts in ensuring the implementation of CFT measures?*



Martha Ounda | *Ag. Secretary to the Bureau, NGO Bureau*

Speaking on efforts in place for collaborating with civil society to complement the bureau's efforts in ensuring the implementation of CFT measures, Ms Oundo submitted the following:

- The Bureau has established a dedicated unit to assist CSOs with AML/CFT compliance.
- The NGO Act is currently under review to address issues related to CFT and the unintended consequences of CFT measures on NGOs.
- The Bureau, in collaboration with the FIA and other agencies, conducts outreach programs and regional reflection meetings with NGO sector stakeholders.
- Staff undergo specialised training, with a particular focus on risk-based approaches.
- Remedial actions are prioritised by engaging with organisations before imposing fines.
- The Bureau has updated its checklist to include AML/CFT areas and the submission of beneficial ownership information to enhance compliance efficiency.
- There is ongoing collaboration with security agencies, including District Internal Security Officers and focal persons, to ensure efficient information sharing.
- An open environment is maintained, encouraging NGOs to approach the Bureau with any questions or concerns.
- The Bureau is also in talks with the Corporate Governance Institute to establish a partnership that will offer training in corporate governance to NGOs to build their capacity in this area.

QN: *What risk-based safety measures can be particularly effective in safeguarding civic space, especially within the framework of international human rights laws and UN Resolution 2462?*



Mr. Fredrick Okado | *Programs Manager, Muslims for Human Rights*

Mr Okado submitted the following as measures that would ensure effective and adequate implementation of CFT measures while safeguarding civic space;

1. Risk Assessment and Proportionality:

- Conducting regular and comprehensive TF risk assessments and consider the specific context of risk of each country.
- Implement measures proportional to the identified risks, avoiding blanket measures that restrict civic space.

2. Human Rights Safeguards:

- Implementing CFT measures within a legal framework that respects international human rights standards.
- Ensure that all the CFT measures are subject to judicial oversight and to prevent abuse and protect civil liberties.

3. Transparency and Accountability:

- Regularly publish reports on CFT actions and their impacts.
- Conducting independent reviews of CFT measures to ensure they do not violate human rights and adjust policies based on findings.

4. Engagement with Civil Society:

- Continuous engagement and consultation with civil society so they are an input in the development and implementation of CFT measures and share their concerns and perspectives and also support CFTs

5. Training and Capacity Building:

- Provide regular training for law enforcement, financial institutions, and other stakeholders on human rights and humanitarian principles.
- Build capacity to support CSOs in complying with CFT measures without compromising their operations.

QN: As a CSO sector player, what are your coping mechanisms?



Ms. Charity Ahimbisibwe | Executive Director, Electoral Laws Institute

Ms. Ahimbisibwe noted that many compliance challenges in the NGO sector stemmed from a knowledge gap and the punitive, directive approach employed by regulators. NGOs were instructed to report and comply without any explanation as to why these requirements were necessary.

1. In 2018, key organisations had their accounts frozen by the FIA without warning.
2. In 2021, 54 NGOs were suspended without prior notice.
3. Last year, the Beneficial Ownership Information requirement was introduced without prior consultation or education.

In response to these challenges, CSOs adopted several coping mechanisms:

- **Self-Education:** NGOs began educating themselves about compliance requirements and relevant legal frameworks.
- **Partnerships and Collaborations:** The sector fostered partnerships to support smaller organisations in navigating compliance processes, providing financial and resource support.
- **Dialogue Initiatives:** CAH and DPI spearheaded efforts to create opportunities for dialogue between regulators and NGO sector actors, aiming to address the trust deficit and enhance collaboration with initiatives like “Talk To Your Regulator.”

“When our accounts are frozen, our rights to association and freedom of assembly are restricted. Regulators need to keep this in mind as they rush to implement some of these measures.”

Hope for a Free Civic Space: Operationalizing the PBO Act, Kenya



Mr. Mutuma Nkanata | Executive Director, Public Benefit Organization Regulatory Authority, Kenya.

In 2024, the Public Benefits Organisations Act, 2013 (PBO Act) was finally operationalized, marking a significant step forward for civil society, according to Mr. Nkanata. He emphasised the pivotal role that CSOs played in bringing this law to fruition. Unlike the outdated NGO Act, the PBO Act grants operational and decision-making independence to the PBO Regulatory Authority.

Moreover, the new law ensures greater inclusion and participation of civil society actors. Civil society organisations are now represented on the board of the PBO Authority by three members, providing them with a voice in decision-making through the National Federation of PBOs, an association representing these organisations.

The PBO Act also addresses the issue of duplicity of laws, where different NPOs were previously registered under various laws such as the Trustees Law, NGO Act, and Companies Law. Now, all nonprofits are required to be registered under the PBO Act, streamlining the legal framework for CSOs. The new law also incentivizes rather than compels CSOs to register, as they become eligible for tax exemptions only after doing so.

Coping Strategies Amidst Non-Risk-Based CFT Measures in Zimbabwe



Mr. Ernest Nyimai | Executive Director, National Association of NGOs

Mr. Nyimai shared that Zimbabwean CSOs face significant challenges due to the unintended consequences of CFT measures, largely stemming from the lack of a national NPO risk assessment. Despite the Mutual Evaluation revealing no significant risks associated with NPOs, current monitoring measures are not risk-based, leading to several issues:

- **Broad Application of CFT Measures:** There is an unfounded assumption that all organisations fit the FATF definition of an NPO, resulting in indiscriminate application of regulations.
- **Increased Surveillance and Arbitrary Arrests:** CSO staff and leaders face heightened surveillance and arbitrary arrests, exacerbating the operational challenges.
- **Stricter Banking Requirements:** Banks have tightened due diligence requirements, which many organisations struggle to meet.
- **Mutual Distrust:** A lack of trust persists, with regulators being suspicious of CSO activities, and CSOs being wary of regulatory requirements.

Coping Mechanisms:

- **Bridging Knowledge Gaps:** CSOs have focused on educating themselves about CFT mechanisms and their implications. Nyimai credited ICNL, DPI, and the NPO Coalition on FATF for their support in this area.
- **Engaging with Regulators:** CSOs have initiated dialogues with regulators to better understand compliance requirements and express their concerns. Nyimai highlighted DPI and CAH's efforts to replicate the "Talk To Your Regulator" program to address the trust deficit.
- **Developing Peer Review Mechanisms:** Plans are in place for sector-led, sector-specific quality assurance within the Zimbabwean NPO sector, aiming to enhance self-regulation and accountability.

The Securitization Of Civic Space In Uganda, Mozambique, Eswatini, Tanzania, Kenya and Zimbabwe: Emerging Trends, Patterns And Impact.

Overview | Mr. Yona Wanjala – Executive Director, Defenders Protection Initiative, Advisor - Civic Advisory Hub



Africa faces legitimate security threats, including violent crime, insurgencies, and terrorism. However, the methods employed by states to address these challenges are increasingly under scrutiny. Securitization—the framing of various issues as security threats—has become a tool for governments to justify the suppression of civic space, often under the pretext of counterterrorism and national security. Despite its critical implications, there

is limited discourse on how securitization is misused to curtail civil liberties and suppress dissent. Led by the Civic Advisory Hub, this preliminary study aimed to explore the securitization of civic space across the six countries, to examine emerging trends, patterns, and the broader impact on civil society, providing valuable insights into this complex and evolving issue.

Objectives of the Study

- To interrogate the evolution of the securitization of civic space, its trends, and patterns in the countries of interest.
- To examine the impact of the securitisation agenda on civic space specifically on NGOs CBOs and the general citizenry.
- To facilitate inter-agency and NPO governance trust building best practices and knowledge sharing within the regulatory authorities.
- Presentation of Research Findings



Kenya

Mr. Brian Kimari | Research Fellow, Centre for Human Rights and Policy Studies

In Kenya, the researcher focused on administrative measures as one of the trends of securitization because they significantly impact civic space, both globally and particularly in Kenya. Kimari noted, "It's one of the few remaining areas where civil society actors have limited capacity and engagement with regulatory authorities."

Administrative Measures:

Actions taken by regulators or regulatory agencies.

Recent manifestations of the securitization of civic space in Kenya have included:

- Arbitrary listing of NGOs in gazettes as affiliated with terrorist funding.
- Deregistration by the former NGO Bureau.
- Financial sanctions, including asset freezes and confiscations.
- Cancellation of public meetings and protests under the guise of national security or terrorism concerns (e.g., during the Reject Finance Bill protests, police claimed intelligence suggested violent actors would infiltrate the protest).
- Restriction of communication in various areas (e.g., the Media Council of Kenya or the Ministry of Interior sometimes summons media agencies and social media actors, issuing warnings that create a chilling effect on free speech).
- Following the first National Risk Assessment (NRA) in 2023, NGOs in areas near Al-Shabaab-controlled regions were classified as high risk, a classification that has been misused to target Muslim faith-based organisations.



Zimbabwe

Ms. Roselyn Hanzi | Zimbabwe Lawyers for Human Rights

Ms. Hanzi highlighted two major emerging trends in the securitization of civic space Zimbabwe:

- **Increased Funding for Securitization:** There has been a rise in financing for government ministries under the guise of administrative mechanisms. This increase in funding is being used to bolster securitization efforts.
- **Legislative Reforms:** Several restrictive laws have been developed, amended, and enacted under the pretence of aligning them with the Constitution.

The Public Order and Security Act was repealed and replaced by the Maintenance of Peace and Order Act. While it is an improvement, the new law has problematic elements, such as granting the president the power to deploy the military without parliamentary approval in cases of national security threats.

Recent attempts have been made to amend the Private Voluntary Organisations (PVO) Act, which regulates civil society organisations. These amendments, justified as necessary to comply with FATF, would give the Minister of Public Services increased control over the registration, operation, and management of PVOs. This includes the ability to stop operations and replace leadership if deemed necessary.

Existing laws, such as the Criminal Law (Codification and Reform) Act, also contribute to securitization. Commonly known as the "Patriotic Act," this law restricts criticism of the country abroad, especially in front of international audiences or diplomats.

The Electoral Act also perpetuates securitization through the observer accreditation committee, responsible for accrediting national and international election observers. The committee's composition is heavily influenced by state actors, including security agents. Last year, several civil society leaders were denied accreditation for national security reasons, which were not disclosed when challenged by legal representatives.

The impacts of these securitization trends have included:

- Increased criminalization of CSO activities, leading to heightened risks for those involved in civil society work.
- Self-censorship among citizens and human rights defenders (HRDs) due to fear of retribution or legal consequences.
- Ambiguity and uncertainty surrounding the Private Voluntary Organisations Act, which hinders CSOs from effectively organising and planning for the future, as their very existence remains in question.

Tanzania

Dr Richard Sambaiga | University of Dar Es Salaam

Dr Sambaiga submitted that securitization of civic space in Tanzania is not a new phenomenon, tracing its roots back to the colonial era when civic associations in the form of associations, either for workers or traders or civil servants, were criminalised.

Post-independence, with the emergence of multi-party politics, more civil society organisations began to form, and the space for them to operate was relatively free, allowing them to mobilise independently. However, this changed after the 1998 terrorist attacks on the U.S. Embassies in Dar es Salaam and Nairobi, which led to increased control over civil society. This shift was marked by the enactment of the NGO Act in 2002, followed by the Counterterrorism Act and other various legal and regulatory measures.



Currently, Dr Sambaiga described the perception of CSOs by the state as ambivalent; they are seen as both strategic partners in delivering social services and as foreign agents due to their reliance on donor funding, or as allies of opposition political parties.

This mutual suspicion and mistrust between the state and CSOs is also a significant driver of securitization.

Additionally, the government's efforts to comply with international and regional commitments, such as those from the FATF, have led to further tightening of civic space. The state's focus on enforcing these commitments has resulted in laws and regulations that CSOs perceive as squeezing their operational space. Sambaiga opined, "This raises questions about the appropriateness and effectiveness of these international recommendations in the Tanzanian context."



Eswatini (Swaziland)

Ms. Mary Pais Da Silva | Co-Director - African Initiative of Women Human Rights Defenders

Ms. Da Silva submitted that as securitization is characterised by speech acts, it is deeply rooted in Swaziland's history, beginning with speech acts dating back to 1973 when the late King Sobhuza abrogated the constitution and banned political parties without any due process, effectively suppressing political participation. CSOs and the labour movement became the primary agents of change, advocating for human rights and social justice.

The introduction of the Suppression of Terrorism Act in 2008 marked a significant escalation in state repression, following a bombing incident near one of the king's palaces. This act has since been used to stifle dissent, infringing on freedoms of expression, association, and assembly. Ms. Da Silva highlighted notable cases, such as the 2011 arrests of two young men charged under this act and the 2021 political unrest, where hundreds were killed, arrested, or maimed. Two members of parliament were also convicted under the act, illustrating the state's growing emboldenment in targeting dissenters, including human rights defenders and activists, many of whom are now labelled as terrorists.

Ms. Da Silva emphasised the lack of judicial independence in Swaziland, with the king wielding significant control over the judiciary, parliament, and cabinet, using both legislation and tradition to securitize civil space. The state's repression is further supported by a militarised police force and, more recently, a private paramilitary company contracted to train security forces on handling "terrorists," a label increasingly applied to civil society actors advocating for accountability and human rights.

Uganda

Dr James Nkuubi | Research Fellow- Civic Advisory Hub

Dr. Nkuubi highlighted recent manifestations of securitization in Uganda, using the example of the anti-corruption demonstrations (March To Parliament) that recently occurred in Kampala. During these protests, the city was heavily militarised with advanced hardware and the President, in a public speech, branded the demonstrators as a security threat to the nation, thereby reframing their constitutionally protected actions as dangerous and disorderly. This rhetoric, according to Dr. Nkuubi exemplified how securitization involves not only labelling and branding demonstrators but also mobilising citizens against them.

He explained that such securitization tactics create divisions among citizens, questioning the legitimacy of those advocating for accountability and casting them as threats rather than as individuals exercising their rights. Terms like "national menace" and "foreign stooges" are used to dehumanise and delegitimise protestors and civil society organisations, making it easier to justify harsh state responses.

Dr. Nkuubi noted that these tactics have broader implications. Organisations providing legal aid to detained protestors, for example, faced criticism and suspicion of being anti-state themselves. He drew parallels with the post-9/11 foreign narrative, where certain countries were labelled as terrorism breeders, and warned that securitization often leads to militarization and the use of force. This, in turn, isolates and criminalises civil society actors, turning civic space into a contested and precarious arena.



After securitization, the next inevitable stage is militarization, which gives rise to a form of governance marked by militancy and when it gets to this, civic space becomes merely aspirational."



Mozambique

Ms. Zenaïda Machado Ezinteje | Senior Researcher, Human Rights Watch

Ms. Machado highlighted the severe impact of securitization in Mozambique, despite the ongoing insurgency. She noted that, so far, no significant figures have been identified as linked to the insurgents. Instead, the majority of those arrested or investigated are ordinary residents, accused of aiding terrorism—charges that, under Mozambique's anti-terrorism legislation, could involve something as minor as providing water.

She pointed out that Mozambique's defence budget has skyrocketed from just over 10 million USD in 2018 to more than 300 million USD, now representing 3.7% of the GDP. Meanwhile, the budget allocation for health has dropped from 15% last year to 8% this year, and education now receives only 5% of GDP. Alarming, the government plans to continue prioritising security funding at the expense of health and education.

Regarding the legal landscape, Mozambique was added to the FATF grey list in 2022, leading to a wave of new anti-terrorism and anti-money laundering legislation. These laws were often passed without consulting civil society, largely approved by the ruling party's majority in parliament. Ms. Machado revealed that some ruling party MPs admitted to not reading the drafts but merely following instructions to vote them through. Opposition members, however, voiced concerns, particularly about the impact on freedom of expression.

She cited specific problematic provisions in new laws,

such as requiring a minimum of ten members to form an NGO, which violates African Commission standards on freedom of association. Additionally, the anti-terror law includes harsh penalties for spreading false information about terrorist attacks, raising concerns about press freedom.

Ms. Machado concluded by discussing the broader impacts on civil society, noting frequent threats against journalists covering terrorism, illegal administrative measures, and increasing cases of journalists being detained or even disappearing. Government officials regularly threaten and accuse NGOs and journalists on live TV, sometimes baselessly branding them as supporters of terrorism, contributing to a climate of fear and uncertainty about majority of those arrested or investigated are ordinary residents accused of aiding terrorism—charges that, under Mozambique's anti-terrorism legislation, could involve something as minor as providing water.

Majority of those arrested or investigated are ordinary residents accused of aiding terrorism—charges that, under Mozambique's anti-terrorism legislation, could involve something as minor as providing water.



Summary of Discussion and Key Recommendations



The core issue lies in the nature of the African state, where authoritarianism persists and grows, yet CSOs have struggled to curb this trend. It is time to critically assess the shortcomings of CSOs, as they continue to rely on the same methods and frameworks, expecting different outcomes. The tools and approaches imposed by the West, particularly in countering terrorism, are ill-suited for the African context. It is crucial to ask deeper questions and develop solutions tailored to the unique challenges of the continent.

Dr Bishop Zac Niringiye | Civic-political activist



The problem of terrorism, often framed through Western perspectives and instruments, fails to address the unique challenges faced in the African context. There is a need for a deeper examination of these issues and the development of solutions tailored to Africa's specific needs and circumstances.

Securitization in Africa is deeply rooted in colonialism, with many nations still governed by outdated colonial laws and practices. These laws, originally designed to suppress the very groups now striving for change, must be re-examined. The path forward requires rethinking and restructuring government systems, crafting modern laws and policies, and identifying the most effective ways to govern our countries and continent.

Dr. Moses Isooba | Executive Director, Uganda National NGO Forum

Additionally, CSOs are often perceived by states as quasi-opposition parties, leading to strained relationships. There is a pressing need to change this narrative and dismantle the outdated structures that cause governments to view civil societies as adversaries rather than partners in national development.



Way Forward and Takeaways

Inclusion, Partnerships, and Collaboration: Despite existing mistrust and friction, it is evident that CSOs, states, and enforcement agencies must work together. Efforts should focus on fostering collaboration to collectively develop effective counter-terrorism financing strategies. Regular engagement with regulators and NPO sector actors is essential to dismantle mistrust and rebuild confidence.

Defining Terrorism Parameters: Clear and consistent parameters for defining terrorism must be established, avoiding the wrongful association of terrorism with specific religions or ethnicities, to ensure a balanced and fair approach.

Localization of CFT Strategies: Counter-Terrorism Financing (CFT) strategies should be localized, integrating them into local systems and involving religious institutions and community leaders to ensure effectiveness and relevance.

While international instruments like FATF influence state laws, Regional Economic Communities (RECs) should work towards developing consistent and uniform CFT measures across the region.

Moving Beyond Compliance: CSOs must go beyond mere compliance and adopt solutions tailored to the African context, ensuring these solutions do not disrupt civic space. CFT measures should be proportional and risk-based, ensuring they do not disproportionately impact civil society.

Impact of Civil Society: Governments often underestimate the significance of civil society. It's crucial to present data and statistics demonstrating the sector's contributions, particularly its role in achieving global development goals. Shrinking civic space hinders progress, especially in a continent with a young population, and the consequences of this can be severe.

Collaboration with Media: CSOs should actively collaborate with the media to raise awareness and showcase their efforts in combating terrorism financing.

Addressing the Illegal Economy: Both the state and CSOs must collaborate to tackle the illegal economy that facilitates terrorism financing.

Addressing Root Causes: It is essential to address the underlying issues perpetuating terrorism and its financing, such as bad governance and the lack of rule of law.

African Civil Society Kampala Declaration.

The conference concluded with the reading and signing of the Civil Society Kampala Declaration on Countering the Financing of Terrorism (CFT) While Safeguarding Civic Space in Africa.

Signatories



Annex

CIVIL SOCIETY KAMPALA DECLARATION ON COUNTERING THE FINANCING OF TERRORISM (CFT) WHILE SAFEGUARDING CIVIC SPACE IN AFRICA

A collective of the African civil society organizations comprising Spaces for Change | S4C West Africa, Defenders Protection Initiative, Civic Advisory Hub, Haki Africa and Vocal Africa have been working to ensure the effective implementation of countering the financing of terrorism (CFT) measures while safeguarding civic space in Africa. Jointly, they put forward this Declaration for the consideration of African governments, intergovernmental and regional bodies, including security agencies, development and multilateral organizations. This Declaration is titled, *African Civil Society Kampala Declaration on Countering the Financing of Terrorism (CFT) Measures While Safeguarding Civic Space in Africa—shortened as African Civil Society Kampala Declaration*.

Recognizing that “terrorism has a real and direct impact on human rights, with devastating consequences for the enjoyment of the right to life, liberty and physical integrity of victims. In addition to these individual costs, terrorism can destabilize Governments, undermine civil society, jeopardize peace and security, and threaten social and economic development.”

Acknowledging that “the resurgence of unconstitutional changes of government; the expanding threat of terrorism and violent extremism across the (African) continent, including the influx of foreign terrorist fighters, private military companies and mercenaries, the proliferation of armed groups, as well as transnational organized crime, have negatively impacted the peace, security, stability, sovereignty and territorial integrity of some Member States”.

Noting that “the measures adopted by States to counter terrorism have themselves often posed serious challenges to human rights and the rule of law. Repressive measures have been used to stifle the voices of human rights defenders, journalists, minorities, indigenous groups and civil society. These practices, particularly when taken together, have a corrosive effect on the rule of law, good governance and human rights.”

Concerned that “governments across the world, including African countries, are extending the application of stringent terrorism-financing regimes to non-profit organizations (NPOs) and charities carrying out humanitarian, service provision and other types of good works to populations in greatest need. These new layers of stringent regulatory measures—ranging from multiple registration points, costly licensing and renewal procedures, duplicated reporting obligations, overlapping regulatory oversight—tilt towards over-regulation of charities, and considerably narrow the operating space for civil society in the continent.”

1. OHCHR'S Factsheet No 32: Human Rights, Terrorism and Counter-terrorism

2. African Union, Declaration on Terrorism and Unconstitutional Changes of Government in Africa, May 2022

3. OHCHR'S Factsheet No 32: Human Rights, Terrorism and Counter-terrorism

4. SPACES FOR CHANGE (2024) Background Paper: Counterterrorism, Human Rights and Civic Spaces in Africa

Reminding that the diversity of voices within civil society working on diverse issues ranging from humanitarian assistance, peacebuilding, conflict prevention, youth development, gender justice, legal empowerment, community engagement and countering violent extremism have also been playing major roles in the fight against terrorism. It is now imperative for African governments, intergovernmental and regional bodies, including security agencies, development and multilateral organizations to strengthen their partnerships with civil society, and commit to taking the following concerted steps to safeguard the civic space while countering the financing of terrorism in the continent:

1. Commit to increasing collaboration and engagement with civil society in the design and implementation of national and regional counterterrorism initiatives; not limited to knowledge-sharing, awareness-creation, and sensitization aimed at preventing and combating acts of violent extremism, terrorism, terrorism-financing, and proliferation financing. This commitment aligns with the provisions of both the Global Counter-Terrorism Strategy and the United Nations PVE Plan of Action which recognized that engaging civil society is an important element of implementing mandates related to preventing and countering terrorism and violent extremism.
2. Pledge to place international human rights law (IHRL) and international humanitarian law (IHL) at the center of their counterterrorism operations in line with Pillar 4 of the United Nations Global Counter-Terrorism Strategy which emphasizes respect for human rights for all and the rule of law as the fundamental basis of the fight against terrorism. This pledge encompasses (a) continuous investments in training and capacity-building for key security and law enforcement personnel on the application of the principles of IHRL and IHL to all armed conflicts situations and (b) removing all subsisting regulatory restrictions hampering humanitarian assistance from reaching some hard-to-reach localities, including giving full effect to the United Nations Resolution 2664 (2022) relating to “humanitarian carve-out” or humanitarian exemption to the asset freeze measures imposed by United Nations sanctions regimes.
3. Decide to reform national and regional anti-terrorism legislations susceptible to misinterpretation and over-regulation of NPOs and civil society organizations. Legal reforms must focus on addressing the following areas: non-definition and vagueness of legal concepts (like national security and terrorism), cumbersome registration and licensing procedures, invasive approval protocols for program budgets and work programmes; multiple regulatory agencies with overlapping functions, costly licensing and renewal procedures, and removing NPOs from the national lists of accountable persons or obliged reporting entities as mandated by revised Recommendation 8 of the Financial Action Task Force (FATF) Standards.
4. Ensure that counter-terrorism operations—whether of a kinetic or non-kinetic nature—do not collide with civic freedoms, especially the right to speak, participate, organize, associate and assemble freely, both physically and (in this digital age) virtually, to propagate and realize their common aspirations. This undertaking involves the duty to remove restrictions on, and the suppression of public gatherings, including protests and the flow of information systems digitally or otherwise. In the context of elections, the ability to associate freely exists where political parties, interest groups, political opposition and associations can assemble to advance their collective interests without fear or hindrance.
5. Institutionalize the whole-of-society approaches to tackling insecurity, extremism and terrorism, ensuring the meaningful participation, leadership, and representation of civil society, women, youth, victims of terrorist activities, traditional and religious institutions as well as recognizing the prior roles they have played in conflict management, resolution, prevention and countering extremist narratives that fuel sympathy, enlistment and recruitment into terrorist and proscribed groups.

6. Undertake to adequately address the root causes and structural drivers of terrorism, violent extremism in Africa and accordingly, strengthen inter-agency cooperation and coordination between several departments, states, regional stakeholders across both the law enforcement and non-law enforcement sectors. This should be in collaboration with relevant CSOs and community leaders through capacity-development, knowledge-transfer, exchange programs and information sharing consistent with the African-led and African-owned approach to countering terrorism agreed to by African governments in Abuja in April 2024.

7. Commit to prioritize the inclusion of women and youth in the design and implementation of national action plans (NAPs) and PCVE programs, with emphasis on education, economic empowerment and supporting the reintegration of survivors of sexual violence (especially resulting from forced abductions and forced marriages to armed fighters), reducing their stigmatization, building social cohesion and community resilience to counter violent extremism in all its forms. This should be undertaken in alignment with the African Union's multidimensional and proactive approach in empowering the youth by reinforcing peace education, tolerance and coexistence.

8. Ensure that security and counterterrorism laws do not suppress press freedoms, including the digital and traditional channels for disseminating and transmitting information, nor censor opinions and fair commentary expressed on televisions and radio, newspapers, magazines, tracts, social media while affording equal opportunities to receive, seek and impart information by any means of communication without any discrimination for reasons of race, color, sex, language, religion, political or other opinions, national or social origin, economic status, birth or any other social condition as enunciated in Principle 3 of the Declaration of Principles of Freedom of Expression and Access to Information in Africa.

9. Introduce adequate regulatory oversight and controls on digital and surveillance technologies procured by countries to ease the detection and deterrence of security threats, ensuring that they are strictly utilized for the fight against terrorism and criminality. Controls such as tightening the import and export of malicious cyber weapons, preventing the indiscriminate and untargeted collection, storage, analysis, sharing or interception of personal communications as well as restraining unlawful surveillance undertaken by State and non-State actors are necessary to prevent the misuse of these technologies to abuse fundamental human rights.

10. Take effective legal and other measures to investigate, prosecute and punish perpetrators of crackdowns on civil society organizations and other civic actors. Consistent with the Marrakesh Declaration of 2018, measures include instituting accessible public complaints systems within national human rights institutions for addressing and adjudicating complaints regarding varying forms of civic space closures in accordance with established rules and codes of conduct, and without any political, commercial or any other undue interference.

As African Civil Society;

Concerned that regional discourse on countering the financing of terrorism (CFT) measures while safeguarding civic space in Africa has not been consistent between NPOs and security institutions across the African continent, we hereby endorse the establishment of the Africa Civil Society Initiative on Countering of Terrorism Financing While Safeguarding Civic Space as an all-inclusive platform to spearhead this discourse in Africa on part of the NPOs. This initiative should cascade to other regional economic communities (RECs) across Africa.

African Union, Declaration on Terrorism and Unconstitutional Changes of Government in Africa, May 2022

This Declaration was adopted by the African Commission on Human and Peoples' Rights (the African Commission) at its 65th Ordinary Session which was held from 21 October to 10 November 2019 in Banjul, The Gambia.

PICTORIAL



PICTORIAL





CIVIC ADVISORY HUB



@CIVICADVISORY

civicadvisoryhub.org
Plot 21 Commercial Road, Ntinda
+256 772 837277

Defenders Protection Initiative
Plot 21 Commercial Road, Ntinda
Kampala, Uganda
communications@defendersprotection.org
+256 392 201102

Spaces For Change
35B, Ajakaiye Street.
Onipetesi Estate, Mangoro,
Ikeja, Lagos.
+234-703-620-2074