

CONCEPT OUTLINE: GUIDELINES ON ENGAGEMENT FOR FATF AND NPOS

Introduction:

At the June 2015 Plenary, the Financial Action Task Force (FATF) [committed](#) itself to engage in a more formalized dialogue with the NPO sector, which was welcomed by many NPOs. According to the official FATF announcement (), “...*The FATF is committed to continuing a constructive engagement with NPOs on these important issues, and will continue doing so on an ad hoc basis, as needed, to facilitate its technical work. The FATF also agreed to enhance its engagement by holding an annual discussion with NPOs on specific issues of common interest.*” In order to facilitate the effective, inclusive, diverse and meaningful participation of relevant organizations, we recommend that the FATF adopts guidelines on engagement with NPO sector. Such Guidelines could enable the FATF to conduct more effective engagement and reach the widest NPO community, and at the same time allow NPOs to focus on providing the most useful input. Such guidelines could be drawn based on practices that exist by other institutions.¹ We are sending a proposal for guidelines that we hope to be discussed at the October plenary and further finalized with NPO input.

Proposed content of the Guidelines:

1. Annual Consultation with NPO sector

1.1. NPO representatives to the annual Private Sector Consultative Forum

- Include at least 3 additional NPO representatives to reflect the diversity of the sector and geographical coverage. Criteria to be considered include umbrella groups or coalitions that represent a large constituency, geographic balance i.e. representatives from the "Global North" and "Global South", representatives from different types of NPOs affected by the FATF standards, etc. (specific criteria should be finalized in consultation with NPOs);
- Consider rotating NPO representatives on 2-yearly basis to allow for more diversity.

1.2 Annual Side Meeting with NPOs

- Meet with NPOs for a day or half-day meeting once a year to discuss the range of issues FATF's programs have on the NPO sector.
- Include a diverse range of NPOs, both geographically and among the types of groups impacted by R8 (while FATF has found that service organizations are at higher risk of abuse than advocacy organizations, all types of NPOs have been and can be impacted by implementation of R8 and other FATF standards).
- Ensure timely (early) announcements regarding NPO meeting and details for NPOs on how to participate;
- Provide NPOs with the opportunity to contribute by organizing a session at the meeting, or by suggesting topic and speakers;
- Ensure timely distribution and publishing all relevant material and draft documents in their early form;
- Allow enough time for meaningful input and discussion at the meeting;
- Publish written NPO contributions online;

¹ Examples of international practices and standards can be found in Annex 1.

- Provide feedback from plenary discussion on the draft documents.

1.3. Alternatively to the annual NPO meeting (from 1.2.): NPO sector workshop during the annual Private Sector Consultative Forum

- Ensure timely (early) announcements regarding NPO workshops and details for NPOs on how to participate;
- Provide NPOs with the opportunity to contribute by organizing a session at the workshop, or by suggesting topic and speakers;
- Ensure timely distribution and publishing all relevant material and draft documents in their early form;
- Allow enough time for meaningful input and discussion at the meeting;
- Publish written NPO contributions online;
- Provide feedback from plenary discussion on the draft documents.

2. Ad hoc engagement and outreach on draft policies

- Circulate questions and share draft documents for input with NPO sector beyond the annual consultation;
- Allow for online (written) contributions as one form of consulting to reach out to different NPOs and enable broad geographical representation; NB. *online (written) contributions can be managed for example by providing a simple template with limited space to ensure targeted input;*
- Provide timely announcements of the process, steps, deadlines and how NPOs can participate;
- Publish drafts in their early form (first concept, first draft, second draft, final draft etc...);
- Allow enough time for meaningful input and inter-sector consultation (which generate less contributions towards the FATF) - at least 5 weeks for input, depending on complexity of documents (specific timeline can be agreed in discussion with NPOs); NB. *As a good practice on national level at least one month is given for consultations when previous drafts have been shared.*
- In addition to online consultation, (co)organize in person consultation meetings with NPOs prior to each plenary meeting where the draft(s) will be discussed (possibly in collaboration with FSRB and/or NPOs to ensure geographic representation);
- Publish online written NPO contributions ;
- Provide feedback from any discussion on the draft documents.

Annex 1

An illustrative list of best practices examples and standards for public participation in decision-making can be found in these documents:

- UN Human Rights Council: [Resolution " Equal participation in political and public affairs"](#), A/HRC/RES/27/24.
- Report of the Office of the United Nations High Commissioner for Human Rights: [" Promotion, protection and implementation of the right to participate in public affairs in the context of the existing human rights law: best practices, experiences, challenges and ways to overcome them"](#), A/HRC/30/26.
- Open Government Partnership: [Civil Society Dialogue](#)
- Council of Europe: [Code of Good Practice for Civil Participation in the Decision-Making Process](#)