



Inter-Governmental Action Group against Money Laundering in West Africa (GIABA)

Communiqué issued at the

Regional Workshop on Preventing Terrorist Abuse of Non-Profit Organizations

Eda Oba Hotel, Lome-Togo, June 12-14, 2017

Preamble

The Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) organized a three (3) day *Regional Workshop on Preventing Terrorist Abuse of Non-Profit Organizations (NPOs)* at Eda Oba Hotel, Lome -Togo, from June 12 to 14, 2017.

Objectives of the Workshop

The main objectives of the workshop were to: (i) improve awareness about the pertinent standards and best practices for regulation and monitoring of NPOs; (ii) identify gaps in the existing legal and regulatory framework in relation to the NPO sector in the region; and (iii) enhance coordination and collaboration between relevant government agencies and operators during national risk assessment and mutual evaluation process.

Opening Session and participation

The Opening Session of the workshop was presided over by the Honourable Minister for Finance & Economy, represented by Mr Kossi Tofio. The Opening and Welcoming remarks were made by Mr. Tchaa Bignossi Aquiteme, Director of FIU, Togo/GIABA National Correspondent, and Mr. Adama Coulibaly, Director General of GIABA respectively. Other dignitaries at the opening session included the representative of the Minister for Security and Civil Protection, Mr Koudouvoh Teko Mawouli (Director General of Policy of the Ministry) and other high level government officials.

The workshop was attended by 46 officials, comprising members of the non-profit sector, regulators, and relevant competent authorities from GIABA member States.

Workshop Delivery

The workshop was delivered by international and regional experts, as well as GIABA Secretariat faculty through presentations and round-table discussions. The following broad themes were covered during the workshop:

- Overview of Relevant International Standards and Implication for the NPOs
- FATF SR VIII: Implementation Status of GIABA member States
- Preventing the Terrorist Abuse of the NPO Sector: The Role of Self-Regulatory Bodies
- Preventing and Protecting the NPO Sector from Terrorism Financing Abuse: UK Experience
- Typologies of Terrorist Abuse of The NPO Sector
- Engagement with the NPO Sector during National Risk Assessment Process: Regional Experience
- Consultation & Involvement of NPOs in Mutual Evaluation process (Pre-onsite, Onsite and Post-Onsite).

Observations

In the course of discussions, participants made the following observations among others:

- That NPOs play important roles in socio-economic development of countries, however they remain vulnerable to terrorist abuse but the risk level varies depending on the nature of services provided.
- That countries have made various levels of progress in the regulation and management of NPOs and adopted diverse measures to mitigate ML/TF risks in the NPO sector.
- That effective coordination and cooperation between NPOs and relevant competent authorities is critical to preventing terrorist abuse of the NPO sector.
- That inadequate legislation, poor outreach/engagement by regulatory authorities, weak human and institutional capacities, as well as low domestic/inter-agency and international cooperation, are some of the factors affecting the operations of the NPO sector.

Recommendations

Based on the observations, participants made the following recommendations;

That National Government/authorities should:

- Undertake a holistic review of the NPOs sector to better understand which NPOs are at risk and apply a risk-based approach in the supervision and regulation of NPOs as operators are not homogenous and thereby face different ML/TF risk levels;
- Engage and involve NPOs in the national risk assessment at an early stage to ensure that they understand the purpose, expectations and scope of the process, and are well prepared to participate in the mutual evaluation process;
- Enhance outreach to the NPO sector to raise awareness and sensitize NPOs on TF as this is a critical element in the implementation of FATF Recommendation 8;

- Strengthen: (i) engagement with communities in areas where NPOs operate, and (ii) cooperation and collaboration with self-regulatory bodies (SRBs) in the management, monitoring and regulation of the NPO sector. In particular, they should encourage NPOs to self-regulate in collaboration with relevant regulatory authorities and involve SRBs in the development of appropriate legal/regulatory frameworks and guidelines; and
- Ensure that measures adopted to protect the NPO sector from terrorist abuse should not disrupt or discourage legitimate charitable activities, rather, such measures must promote human rights, transparency and engender greater confidence in the sector.

That National NPO Networks/Platforms should:

- Strengthen regional cooperation under the platform of Regional AML/CFT CSOs Forum to facilitate experience sharing, development and dissemination of best practices, coordination with GIABA in support of regional efforts against terrorist financing, and foster interest of members.
- As a duty work with regulators in preventing terrorist abuse of the sector including creating an enabling environment for the NPO sector to thrive.

That GIABA should:

- Support the Regional AML/CFT CSOs Forum to develop a model law for the NPO sector
- Undertake advocacy visit to national authorities to promote awareness raising on issues relating to NPOs, including the development of a central electronic database on NPOs.

Vote of Thanks

We the participants hereby express our appreciation to GIABA for organising this event, resource persons for excellent delivery; and the good people and Government of Togo for their generous hospitality.

Made this 14th Day of June, 2017 in Lome, Togo.