

Experiences working with NPOs and Governments on the Risk Assessment Process

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Some persistent misunderstandings

- 1: NPOs are (all) particularly vulnerable.
2. The National Risk Assessment covers the risk assessment requirement in R8.
- 3: If in doubt, impose more regulation!
- 4: Focus on laws and regulations, at the expenses of 'other measures'

Issues with Risk Assessments (1)

- Difference between 'FATF NPOs' and NPOs as defined in the country's law.
- Dealing with information gaps
 - Lack of data
 - Confidentiality
- Qualitative vs. quantitative data
- The difference between 'risk' and 'consequence'

Issues with Risk Assessments (2)

- Circular categorisation
- Discrepancies between organisational and functional categories
- The consequences of the results
 - De-risking
 - Singling out

Our approach

- Using global information to fill local gaps
- Demonstrating to Evaluators how you have come to your conclusion
- Inclusiveness

Issues with Evidence

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