HPG outcome note

Financial access challenges specific to non-profit organisations, notably local and faith-based organisations

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International dialogue series on easing the financial access challenges faced by humanitarian actors in contexts regulated by sanctions or counterterrorism measures

Key messages

Counter-terrorism, financial and trade sanctions, and export controls have a direct impact on the ability of non-profit organisations (NPOs) to operate and transfer funds in contexts regulated by these measures, and therefore to implement humanitarian, peacebuilding, human rights and development activities.

Local organisations, notably women-led or Muslim faith-based organisations, particularly those operating in 'high-risk' countries, are disproportionately affected by bank de-risking practices driven by compliance frameworks, sanctions regimes and anti-money laundering/countering the financing of terrorism (AML/CFT) measures. As a result, these organisations are often reliant on international partners to access foreign funding.

Local organisations are adept at finding alternative solutions to facilitate financial transactions, but many of these are ad hoc 'workarounds'. Greater focus is needed to identify sustainable systems-level solutions and ensure the commitment of tri-sector stakeholders to guarantee their potential.

Strategic collaboration between local NPOs and equitable partnerships with international NPOs are effective and sustainable ways to address operational and financial access challenges, as these approaches help share risk, build capacity, and improve financial inclusion. Best practices from Afghanistan and Myanmar could be replicated elsewhere.

HPG Humanitarian Policy Group

ODI Global

Continued overleaf

Key messages (continued)

Extending opportunities for multistakeholder engagement is critical. It is important to create tri-sector groups in all countries where there are critical de-risking issues for NPOs, learning from existing practices. The Nigerian Multi-stakeholder Working Group provides a good example of collaborative problem-solving to reduce barriers to NPO financial inclusion while safeguarding financial system integrity.

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About this publication

The US Agency for International Development (USAID)'s Bureau for Humanitarian Assistance commissioned the Humanitarian Policy Group (HPG) at ODI Global to convene a series of dialogues on the financial access challenges faced by aid organisations in complex humanitarian settings in which financial regulations limit humanitarian operations.

This publication summarises the discussion from the fourth dialogue, held on 4 December 2024, which explored the specific challenges faced by non-profit organisations, notably local and faith-based organisations.

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Abbreviations

ADRRN	Asian Disaster Reduction and Response Network
AML	anti-money laundering
CFT	countering the financing of terrorism
COAR	Citizens Organization for Advocacy and Resilience
FATF	Financial Action Task Force
FCDO	Foreign, Commonwealth and Development Office
FI	financial institution
INGO	international non-governmental organisation
INPO	international non-profit organisation
LIA	Local Intermediary Actor (network)
MVTS	Money or Value Transfer Services
NEAR	Network for Empowered Aid Response
NGO	non-governmental organisation
NPO	non-profit organisation
TSG	tri-sector group
UNSC	United Nations Security Council
USAID	United States Agency for International Development

Glossary

De-risking is the phenomenon of financial institutions indiscriminately terminating or restricting business relationships with clients or categories of clients to avoid, rather than manage, risk.

Independent financial regulators are established, normally at national level, to oversee the functioning and fairness of financial markets and the firms that engage in financial activity.

International humanitarian law (IHL) is a set of rules that seeks, for humanitarian reasons, to limit the effects of armed conflict. IHL is also known as 'the law of war' or 'the law of armed conflict'. It is part of public international law, which is made up primarily of treaties, customary international law and general principles of law.

The Financial Action Task Force (FATF) is the global money laundering and terrorist financing watchdog. It sets international standards that aim to prevent these illegal activities and the harm they cause to society. The FATF notably provides comprehensive international standards through its Forty Recommendations on Combating Money Laundering and the Financing of Terrorism and Proliferation.

Tri-sector groups/dialogues bring together representatives from governments, financial institutions and non-profit organisations at the national level. The term 'tri-sector' is used generically throughout this document. These groups have different names in different countries: tri-sector, multisector, roundtable, etc. There are a number of active groups including in the United States, United Kingdom and the Netherlands, and significant effort underway to (re)establish other groups in more countries.

United Nations Security Council Resolution 2664 refers to the 'humanitarian carve-out' adopted by the Security Council. It is a standing exemption to the asset-freeze measures imposed by United Nations sanctions regimes. It specifies that 'the provision, processing or payment of funds, other financial assets or economic resources or the provision of goods and services necessary to ensure the timely delivery of humanitarian assistance or to support other activities that support basic human needs are permitted and are not a violation of the asset freezes imposed by that organ or its sanctions committees' (UN, 2022).

United Nations Security Council Resolution 2761 refers to the continued application of the humanitarian carve-out (UNSCR 2664) to asset freeze measures imposed by the UNSCR 1267 ISIL (Da'esh) and Al-Qaida sanctions regimes (UN, 2024). It now offers humanitarian organisations a standing exemption.

Executive summary

This outcome note summarises discussions and recommendations from the Humanitarian Policy Group (HPG)'s recent international dialogue, held on 4 December 2024, which explored specific operational and financial access challenges for non-profit organisations (NPOs). The discussion focused particularly on local and Muslim faith-based organisations, which often face the heaviest burden when it comes to sanctions, anti-money laundering (AML) and countering the financing of terrorism (CFT) measures.

NPOs face significant financial access challenges due to counterterrorism regulation, sanctions and export controls, and ultimately bank de-risking, which impact their ability to transfer funds, run programmes and cover expenses. These issues cause delays, increased costs, and may force NPOs to withdraw from certain areas due to complex regulations and the risk of unintentional breaches.

The situation is particularly acute for local NPOs, women-led, and Muslim faith-based organisations, especially if they are operating in 'high-risk' countries. It is these organisations that face the brunt of de-risking and often lack the resources of their international counterparts to manage compliance frameworks. As a result, local actors are often dependent on UN or international NPOs present in-country to act as intermediaries to channel funds. In cases where these partnerships aren't available, it can be impossible for local actors to receive funding from abroad.

During the dialogue, representatives from NPOs in Afghanistan, Myanmar, Nigeria, Syria, and Muslim faith-based organisations highlighted operational and financial access challenges, both domestically – often driven by over-compliance with the Financial Action Task Force (FATF) Recommendations – and internationally, where transactions are frequently blocked or delayed due to sanctions and AML/CFT measures.

They shared the ways in which they had tackled these challenges in order to receive payments, many of which were ad hoc workarounds that continually needed to be negotiated. There are, however, effective and more sustainable solutions that include strategic collaboration between local NPOs and equitable partnerships with international NPOs. These approaches help share risk, strengthen capacity, and improve financial inclusion.

Governments and financial institutions (FIs) have an important role to play in facilitating direct funding to local NPOs, covering compliance costs, addressing discrimination against specific client groups, and legally protecting the right to access a bank account.

The importance of tri-sector engagement between governments, FIs and NPOs, and, where relevant, regulatory bodies was repeatedly emphasised. The Nigerian Multi-stakeholder Working Group provided an excellent example of collaborative problem-solving to reduce barriers to NPO financial inclusion while safeguarding financial system integrity.

Finally, the use of fintech was briefly discussed, with participants expressing an interest in further exploring the potential of crypto currencies and co-developing tailored payment solutions to ensure reliable services in high-risk environments.

Participants made a series of recommendations, including:

- replicating best practices shared during the meeting, such as:
  - strategic partnerships between local and international NPOs (e.g., Citizens Organization for Advocacy and Resilience (COAR) in Afghanistan, Network for Empowered Aid Response (NEAR) and intermediary relationships between international NPOs and local NPOs);
  - local NPO collaboration (e.g. Local Intermediary Actors network (LIA) in Myanmar);
  - government measures (e.g. Belgium's right-to-a-bank-account law; the US Agency for International Development (USAID)'s Fixed Amount Awards);
  - financial inclusion guidance (e.g. Dutch Banking Association's anti-profiling guidance).
- international NPOs and donors providing sustained support to local actors to move from ad hoc workarounds to long-term solutions, including partnering locally and strengthening NPO capacity. National tri-sector groups (TSGs) and the ODI Global/HPG-convened international dialogue should put greater effort into engaging directly with local NPOs to understand the impacts of regulations at the local level.
- strengthening cross-sector collaboration, particularly through the creation of TSGs in operating countries where de-risking issues apply. Learning from existing practice in Nigeria, the Netherlands, UK and US is important.
- harnessing technology such as crypto wallets or tailored payment solutions to improve the reliability of services, reduce account freezes and streamline fund transfers.

Introduction

Financial regulations linked to sanctions, anti-money laundering/countering the financing of terrorism (AML/CFT) and other illicit finance, along with export controls and trade sanctions, have a negative impact on the ability of non-profit organisations (NPOs) to carry out humanitarian, development and peacebuilding activities. This is despite the progress made in formal protections for humanitarian action – notably through UN Security Council (UNSC) Resolution 2664,[1] approving a humanitarian carve-out to asset freezes in current and future UNSC sanctions regimes, and the more recent adoption of UNSC Resolution 2761, the standing application of the humanitarian carve-out to the ISIL (Da'esh) and al-Qaida sanctions regime (UN 2022; 2024).

The multiplicity of financial regulations within and between jurisdictions, including the discrepancies between sanctions and AML/CFT measures, create enormous complexity, a heavy regulatory burden and additional cost for those needing to comply, leading to a chilling effect and de-risking of NPOs primarily by financial institutions (FIs) and, sometimes, by NPOs themselves.[2] This impacts the ability of NPOs to operate, notably in contexts subject to sanctions or where proscribed organisations operate.

On 4 December 2024, the Humanitarian Policy Group at ODI Global convened the fourth international dialogue in a series of dialogues on financial access challenges faced by aid organisations in complex humanitarian settings, in which financial regulations limit humanitarian operations. This fourth dialogue focused on **financial access challenges specific to NPOs, notably local, Muslim faith-based organisations and women's rights organisations,** as a result of the complex web of sanctions regimes and AML/CFT measures, export controls and trade sanctions (including material support). It sought to achieve the following outcomes:

- provide an international platform to hear from smaller, local NPOs who bear a large part of the brunt of downstream de-risking;
- identify best practice examples that can be replicated to assist smaller, local NPOs in their own processes;
- garner an understanding of any impact that sanctions regulations and AML/CFT measures may have on the policy objectives of localisation and decolonisation of aid.

1 A survey of NPOs carried out by ICVA in October 2024 (see Appendix) found that while 80% of respondents were aware of UNSC Resolution 2664, only 10% noticed any changes in the challenges faced in transferring funds. Over half of the respondents were uncertain of any practical impact of the Resolution on their work.

2 An ICVA survey (op. cit.) found that 65% of respondents indicated that the key financial barriers faced were due to complex regulatory frameworks and inconsistencies in their implementation.

During the dialogue, representatives of local NPOs, Muslim faith-based organisations and women's rights organisations, which are disproportionately impacted by financial access challenges, shared the obstacles that they face and best practice solutions to overcome these.

The meeting was held in a hybrid roundtable format. It was a closed-door meeting held under the Chatham House Rule of non-attribution. Participants represented governments, multilateral institutions, NPOs, FIs, the United Nations (UN) and think tanks.

De-risking widens inequalities amongst NPOs

Financial access challenges faced by NPOs are well documented. Counterterrorism legislation, financial and trade sanctions and export controls have a direct impact on NPOs' ability to: transfer funds; implement humanitarian, peacebuilding, human rights and development programmes; pay salaries; import or purchase goods; and rent premises. These restrictive measures can cause bank de-risking, which results in serious delays in operations and higher costs, and can lead to NPOs withdrawing from certain areas due to the difficulty of navigating complex regulations and the risk of unintentional breaches.

Many large international NPOs (INPOs) have been able to deal with these restrictions by increasing their resources dedicated to due diligence and compliance measures, accessing specialist pro bono legal advice, as well as advocating with governments and FIs. However, this is not the reality that exists for smaller local organisations or for Muslim faith-based organisations, who bear the brunt of de-risking.

Small and local organisations

Local NPOs, particularly those in high-risk countries, are most impacted by restrictive financial regulations, including sanctions and AML/CFT measures. These frameworks often limit their access to international funding, forcing reliance on intermediaries like the UN or international NPOs. In the absence of such intermediaries, local actors may be entirely cut off from receiving funds through traditional banking systems, further deepening sectoral inequalities and undermining localisation efforts.

Local actors face additional financial access challenges in-country. The Nigerian Multi-stakeholder Working Group on Charities listed the extent of these challenges in its kick-off meeting in May 2024:

> [the] dearth of banking services in certain regions of the country, bureaucratic onboarding processes for NPO customers, registration and certification difficulties, high debit and account maintenance charges, confirmation bias for cash movements, financial exclusion of beneficiaries of humanitarian assistance, onerous beneficiary and vendor screening processes, complex due diligence requirements, complex account opening documentation requirements, harsh application of AML/CFT policies, misuse and/or overstretching of terrorism financing legislation, sudden freeze or closure of accounts without notification, blocking of bank accounts. (Spaces for Change, 2024)

Some of these challenges stem from the 'weaponisation' of the Financial Access Task Force's (FATF's) AML/CFT standards by authorities seeking 'to crack down on targets who threaten their interests' (Reimer, 2024: 1). In other cases, state and private actor behaviour is often characterised by 'over-compliance', particularly in reference to the FATF Recommendation 8 on NPOs, despite recent revisions and best practice guidance. In all cases, misuse, abuse or misapplication of these measures can deliberately hinder the operations of local NPOs.

The challenges faced by local organisations due to restrictive financial regulations are compounded by their limited resources. Most are small but have large mandates to support the needs of their communities. To meet regulatory requirements, they must divert scarce resources away from essential activities. Counter-terrorism financing rules also overlook the unique roles of smaller women's rights and peacebuilding organisations, making it harder to support their essential grassroots efforts to combat violence and extremism in their communities, and to work towards peace (Duke Law International Human Rights Clinic and Women Peacemakers Program, 2017; Subramanian-Montgomery and Kharkar, 2024).

A representative from a Syrian women-led peacebuilding organisation provided the dialogue with a stark picture of the challenges she faces:

> We cannot open a bank account personally or institutionally despite our presence locally and internationally. We've open presences in multiple countries, drained our resources and yet have only managed to open one bank account. As soon as you announce, or someone researches us online, that we are funding women-led peacebuilding work in Syria, the account is closed. We have even considered creating our own bank.

Muslim faith-based organisations

Many Muslim faith-based organisations experience bank de-risking as a result of the discrimination and bias that has been built into the domestic and global banking system. AML/CFT regulations worldwide have been heavily influenced by geopolitical concerns that, particularly since 11 September 2001, have focused on specific regions and entities associated with Muslim-majority countries. In bank compliance systems, if a transaction contains certain keywords, including ones associated with high-risk regions, countries or groups, along with words like 'Islamic' or 'Muslim', it often triggers additional scrutiny or a hold by the bank due to the perceived risks around terrorism financing.

The combination of operating in complex regions, common misconceptions, and disinformation campaigns surrounding Muslim charities can lead certain banks and payment platforms to view them as riskier clients, fostering heightened suspicion without evidence of wrongdoing (see Box 1). This can result in banks taking measures such as withholding international transfers, suspending or closing accounts without notice or a clear justification, or refusing to open new accounts. In addition, data held by sanctions screening companies used by FIs in their decision-making process lack transparency about specific sources, verification processes or risk-assessment criteria.

The heightened discrimination faced by Muslim organisations since the Israel–Gaza crisis began in October 2023 was powerfully highlighted by a representative from LaunchGood, a crowdfunding platform for Muslims. The platform has recently experienced account closures across financial, subscription and payment services. In response, LaunchGood is now working to establish itself as a payment processor.

Box 1 Muslim Charities Forum

The Muslim Charities Forum (MCF) research on bank de-risking within Muslim charities provides evidence of the widespread challenges faced by Muslim faith-based organisations. Many of these challenges stem from a disproportionate perception of risk for Muslim-led charities or disinformation campaigns that increase regulatory scrutiny, as well as individual bank policies and processes that fail to provide appropriate support to clients, and over-compliance of regulatory norms.

A survey of MCF's membership highlighted that 68% of Muslim-led charities faced difficulties opening bank accounts and even once these services have been acquired, 42% of survey respondents stated their organisations had experienced a complete withdrawal of banking services. Two-fifths of respondents reported challenges with transferring funds, which delayed vital humanitarian operations.

These challenges have far-reaching effects. They put extra pressure on staff who must handle the administrative burden, increase risks for employees working in high-risk areas, and damage relationships with downstream partners who rely on timely fund transfers. Delays and account closures have weakened trust, not only with partners but also with the communities in need.

Adapted from Arjumand (forthcoming)

These financial barriers not only hinder Muslim organisations' ability to deliver humanitarian aid and fulfil their missions but may also force them to operate outside regulated channels, increasing their exposure to risk.

Some FIs are working to refine compliance processes to ensure fair treatment of all religious and cultural organisations (see Box 4 on page 19), although this is not widespread.

Mitigating financial access barriers: workarounds vs sustainable solutions

Local organisations are adept at finding solutions to enable the receipt of funds despite the challenges that come with restrictive financial regulations. However, many of these are temporary fixes described as 'workarounds' rather than sustainable long-term solutions.

During the international dialogue, representatives of local organisations shared their experiences with both workarounds and more sustainable approaches. The discussion focused on identifying the most impactful solutions and extracting lessons from specific contexts that could be adapted and applied in other settings.

Sharing risk through trust-driven partnerships between NPOs

Building long-term, meaningful and trust-based partnerships between NPOs at the local level and between INPOs and local NPOs is an important element to address financial access difficulties.

Large INPOs have invested considerable resources towards developing their own robust compliance processes including due diligence, risk mitigation, self-regulation and staff training, often at substantial cost. Participants suggested that **INPOs could take on more responsibility to carry out due diligence to prevent this burden being systematically pushed down to smaller or local NPOs and other last-mile actors, as it often is today.**

Current INPO best practice includes sharing of tools and software related to assessment or compliance, transferring overhead budgets to local partners to better resource compliance functions, utilising their relationship with donors to negotiate greater flexibility for local partners, and supporting local NPOs with their relationships with local banks.

Capacity-strengthening of local NPOs, where acknowledged and requested, is also an important responsibility for INPOs and is one of the most sustainable ways that they can support local organisations to manage financial access and de-risking challenges. A good example of this is Islamic Relief's localisation programme STRIDE (Strengthening Response Capacity and Institutional Development for Excellence) which includes the training of local humanitarian partners on due diligence processes (Islamic Relief, 2023).

However, the current 'capacity-building' model needs to be broadened to include long-term commitments to strengthening local NPOs in all core functions beyond just programme delivery and/or compliance. To better facilitate this, donors should require and fund institutional-strengthening activities in their grant agreements.

Another key role for **INPOs is to act as intermediaries**. Routing funding via intermediaries is considered to be one of the most effective ways to get funds from international donors to local NPOs (see Box 2). It also offers the opportunity to share risk, as the intermediary absorbs part of it on behalf of the local partner. It should be noted that whilst this offers a practical solution, reliance on INPOs can perpetuate power imbalances and conflicts with sector-wide commitments to localisation. This model can take several forms, for example:

- Through local NPO–INPO agreement enabling the INPO to receive funds from the donor on behalf of the local NPO, which are then transferred onwards using the most efficient method (e.g. cash, mobile money, local bank transfer if possible). Participants cited examples of this for operations in Afghanistan and Lebanon.
- Through a sub-grant model whereby the local NPO is already identified as a sub-grantee of an INPO in a donor-funded programme. The funds are then transferred locally in the most efficient form. Participants cited examples of this model in Syria.

One proposed solution is for INPOs to assist local NPOs to open branches in a third country, enabling them to access bank accounts there and transfer funds more easily. However, this approach often carries higher risks and costs for local NPOs, along with challenges to manage foreign registration processes.

Participants also discussed what local NPOs need from donors and INPOs to better manage compliance requirements. Firstly, there is a need to shift power relationships to create more equitable partnerships. As part of this, local NPOs need flexible, long-term quality funding as well as realistic due diligence demands.

Box 2 Strategic partnership between local NPOs and INPOs

Receiving funding in Afghanistan is particularly complex with correspondent banks blocking transactions to the country due to international sanctions, despite the humanitarian exemptions provided in UNSC Resolutions 2615 (2021) and 2664 (2022).

Citizens Organisation for Advocacy and Resilience (COAR) is a national non-governmental organisation (NGO) operating in Afghanistan. Its partnerships with a few international NGOS (INGOs) operating in the country enable COAR to receive direct funding into its bank account. Where this is not the case, other ways need to be found. COAR has signed memoranda of understanding with trusted money-service providers who receive funds from the donor in a bank account in a third country. These arrangements, however, are subject to donor agreement, which in some cases has been withdrawn. Opening bank accounts in third countries such as Turkey or the Gulf states is not an option as it is expensive, and COAR is not registered in these countries.

COAR is a member of the Network for Empowered Aid Response (NEAR) and the Asian Disaster Reduction and Response Network (ADRRN). This membership enhances COAR's credibility and trust within the humanitarian and development community.

> Despite continually searching for solutions, international transfers continue to be significantly delayed, which affects our ability to implement lifesaving projects. (COAR representative, Afghanistan)

NEAR operates the Change Fund, an innovative finance solution designed to rapidly allocate funding to frontline organisations such as COAR to respond to emergencies.

> Building trust with local partners and their preferred money-service providers is key to getting money into their hands. We need to trust that local actors know the most effective solution to transfer funding directly and quickly. (Local and national NPO network representative)

Collaboration between NPOs at local level in operating countries can be very impactful to alleviate financial access challenges.

In Myanmar, local and national organisations have far greater access to communities in need than international NPOs, yet they face major challenges to access funds, notably since Myanmar was blacklisted by the FATF in 2022. This impacted funds coming into the country but was also a factor in the passing of the Organisation Registration Law regulating the registration of all NPOs, which the military junta legislated to further impose far-reaching controls and constrain the work of local, national and international NPOs.

The Local Intermediary Actors (LIA) network in Myanmar is a best practice example of local NPOs working effectively in a collaborative manner at national level. It was officially launched in September 2022 and currently comprises 14 long-standing local NGOs.

This network plays a crucial role in channelling international support to local organisations in different parts of the country. They mediate funding and compliance requirements, thereby absorbing much of the fiduciary risk. The intermediary organisations have built their own institutional systems and human resources and dedicate much time and effort to passing donors' due diligence processes. In doing so, they shoulder risk and support smaller organisations lacking formal structures, compliance mechanisms or direct donor access.

> LIA is able to support small-scale local actors to meet the needs of communities that cannot be reached by international NPOs. It enables financial inclusion of these organisations. (Civil society representative, Myanmar).

Examples of 'workarounds'

Representatives of local NPOs shared many of the 'workarounds' that they have implemented to be able to receive funding. These are often costly and not necessarily sustainable in the long term. Examples include:

- **Use of non-traditional payment channels, such as Money or Value Transfer Services (MVTS)**. Many, if not most, NGOs have used MVTS in their humanitarian operations in recent years as a 'legitimate tool of last resort' (Moret, 2023a: 5). However, donor stances on the use of such tools vary and require greater clarity or tailored guidance in order to be used more effectively. Likewise, FIs' risk appetite for transactions that involve value transfer services vary widely, but many take firm positions including closing accounts or refusing to service payments if transactions involve MVTS.
- **Embassy bank account transfers**. Some governments have trialled, with limited success, transferring 'donor funds from a country's foreign ministry bank account to the account of the government's embassy in a financially excluded country' (Moret, 2023b: 15). These funds are then channelled onto selected NGO partners.
- **Transfer of funds via bank accounts in third countries**. NPO, individual/family members or vendor bank accounts in Turkey or Gulf countries are often used by local NPOs in Afghanistan and in the Middle East and North Africa region. This solution increases the time and costs of transferring funds.
- **Currency swaps**, allowing for physical cash in the local currency to be released for use in humanitarian operations in return for electronic settlement into a bank account, often outside the country. The transporting of physical cash is sometimes used when no other solution exists.
- When conventional banking is not possible, **funds can be delivered directly through digital crypto wallets or mobile payment systems** to receive, hold and spend funds securely, bypassing the need for local banks. Over the last decade, international and local NPOs have increased their use of digital payments and mobile money systems to provide cash-based assistance programmes to affected populations.

Interestingly, while participants did cite usage of mobile wallets like Google Pay or Apple Pay (while expressing concern about the monopoly these systems hold on the sector), none had used crypto wallets, mostly due to their complexity and volatility, perceived as adding an additional layer of risk. They expressed interest to further explore the potential of crypto currencies.

Setting up tri-sector groups in 'operating countries'

As in previous dialogues, participants stressed the value of national tri-sector/multisector groups as best practice to increase the understanding between governments, Fs and NPOs to collaboratively seek practical solutions to financial access problems. These can be as valuable in operating countries as they are in donor countries. The models can vary from one context to another, but all require trust, accountability and joint ownership of the process to be successful (see Box 3).

Box 3 Tri-sector dialogues in 'operational' contexts

The 2022 Nigeria National Inherent Risk Assessment had NPO representative participation, and NPOs were identified as a specific sub-set (they had previously been grouped with other businesses and professions). However, this adjustment, while making Nigeria compliant with the FATF standards, did not remove the overall high-risk label placed on NPOs by FIs, considering them particularly vulnerable to terrorist financing abuse, and highlighted conflicting legislation and regulatory practice.

This led to significant banking challenges for NPOs, including limited access to banking services in some regions, complex onboarding and due diligence requirements, high fees, financial exclusion of humanitarian programme participants, and harsh application of AML/CFT policies. De-risking measures also included sudden account freezes, blocked accounts, and burdensome registration and compliance processes.

On 30 April 2024, the Nigerian Multi-stakeholder Working Group on Charities held its inaugural meeting, bringing together banks, policymakers, law enforcement agencies and NPOs to address bank de-risking of NPOs from a multi-sectoral perspective.

Drawing on the diverse expertise in the room, the group collaborated to address barriers to NPO financial inclusion. Government bodies and FIs acknowledged gaps in AML/CFT policies that disproportionately impact NPOs, despite minimal evidence of terrorism financing risk.

> This first meeting of the [working group], which has since met twice, was a real eye-opener for the banks to understand the enormity of the problem for NPOs as the result of their classification as high-risk. We are using this group to progressively tackle the limitations to NPOs' financial inclusion while safeguarding the integrity of the country's financial system. (Spaces for Change representative, Nigeria)

Best practice to follow for tri-sector/multisector groups includes: clearly framing objectives to align with the needs and mutual benefits of the different stakeholder groups; creating a safe space for discussion (the Chatham House Rule of non-attribution can help towards this); communicating in a transparent manner; ensuring consistent participation of members to foster informal working-level relationships; and involving technical knowledge and subject matter experts.

Within these groups, 'bi-stakeholder' collaboration is also impactful. For example, in the United Kingdom (UK), the Foreign, Commonwealth and Development Office (FCDO) amended its sanctions requirements based on research carried out by UK NPOs in collaboration with a UK bank; in Germany, NPOs and FIs advocated for the establishment of a tri-sector group.

Governments and FIs should share the risk

Participants recognised that whilst the humanitarian carve-out provided by UNSC Resolution 2664 has led to considerable progress for humanitarian actors, its actual implementation needs to improve. As part of this, and as repeatedly mentioned throughout this dialogue series, there needs to be greater coordination and policy coherence at the national level between sanctions and AML/CFT measures as well as between jurisdictions (see Spencer and Alderson, 2024).

The responsibility to take measures to mitigate the financial access challenges should not fall on NPOs alone. Governments and FIs also share that obligation.

Participants stressed the need for greater donor flexibility. The United States Agency for International Development (USAID)'s Fixed Amount Awards were a best practice here (see USAID, 2022); they minimised risk to USAID while facilitating direct funding of local actors in part due to the by-passing of pre-award audits. This mechanism could be replicated by other donors.

Participants also highlighted the issue posed by the inclusion of restrictions in grant agreements that go beyond counterterrorism measures and sanctions. For example, the requirement to screen and thus potentially exclude final recipients is particularly problematic, being contrary to international humanitarian law and humanitarian principles. Counterterrorism clauses in USAID, FCDO or European Civil Protection and Humanitarian Aid Operations (ECHO) grants, while sharing similar objectives, differ in language and scope, creating additional complexity for NPO recipients. These discrepancies and other specific cases of over-reach need to be addressed.

Efforts in the Netherlands and Belgium were highlighted as best practice for improving financial access for NPOs. In the Netherlands, the Dutch Banking Association's sector industry baseline for NPOs offers clear and accessible information on requirements and enables banks to better support financial inclusion (see Dutch Banking Association, 2023 and Box 4). The guidance has led to banks downgrading the risk of ratings of many NPOs.

In Belgium, individuals residing in the country and registered NPOs have a legal right to open a basic bank account. Participants pointed to the National Bank of Belgium's guidance discouraging banks from de-risking categories of customers. Instead, banks are required to follow risk-based due diligence processes (see NBB, n.d).

Box 4 The Netherlands tackles discrimination against Muslim clients

The Netherlands government and banking sector have taken measures to tackle discrimination against Muslim clients. In April 2023, the Dutch National Coordinator against Discrimination and Racism spoke about structural discrimination against Muslims by banks, leading to three new studies on the subject (a self-assessment among six major banks, a study by the Ministry of Finance and a study by the Dutch Central Bank – see De Nederlandsche Bank, 2024). The outcomes were discussed with the Dutch Banking Association which, in May 2024, then published guidance for banks to prevent religious and ethnic profiling (College for Human Rights, 2024). Further guidance is under development by the Dutch Ministry of Finance to prevent discrimination and racism by FIs.

In both cases, these efforts also require socialisation of the guidance amongst relevant organisations and the general public more broadly to achieve maximum impact.

Recommendations

Replicate best practice

- Tri-sector groups (TSGs), NPOs, FIs and governments should examine best practice examples of scalable and replicable solutions shared during the dialogue. These include:
  - Strategic partnerships between NPOs such as COAR with NEAR Network and ADRRN to enhance credibility and trust within the humanitarian community.
  - Collaboration with local actors/NGOs such as the LIA network in Myanmar to channel funds, mediate compliance requirements and absorb fiduciary risk.
  - TSGs in Nigeria, the Netherlands, UK and US to collaboratively seek solutions to financial access solutions.
  - International NPOs acting as intermediaries in the transfer of funds to local NPOs, while ensuring that this does not perpetuate power imbalances.
  - Belgian legislation enshrining the legal right to have a bank account.
  - Dutch Banking Association guidance for banks to prevent religious and ethnic profiling.
  - USAID's Fixed Amount Awards facilitating direct funding of local actors

Partner locally and support a meaningful shift from ad hoc workarounds to lasting solutions

- There is immense value in donor governments and FIs hearing directly from local NPO representatives working in conflict and fragile environments. Greater effort should be put into engaging with local NPOs through national tri-sector dialogues and through the international dialogue convened by HPG.
- Capacity-strengthening of local NPOs is one of the most sustainable ways to help them deal with financial access and de-risking challenges. The capacity-building model should be adapted to include long-term commitments to strengthening local NPOs in all core functions beyond programme delivery. Donors should fund capacity-strengthening/enhancement for local partners, including compliance-related costs. (Capacity enhancement models should focus on 'capacity to grow', not only 'capacity to comply').
- Collaboration between NPOs at local level in operating countries should be developed to share risk and address financial access challenges. Myanmar's LIA network is a best practice example of local NPOs joining forces to effectively mediate local compliance issues, share risk and support grassroots organisations.
- Donors should adopt more flexible funding and simplify due diligence to directly support local organisations, drawing on USAID's Fixed Amount Awards as a best practice. In this regard, data sharing should be part of a continuous feedback loop, ensuring NPOs receive updates on how their data is used and its role in shaping policy.

- NPOs should find ways to raise awareness among donors and FIs of the robust financial control measures they have in place. One NPO suggested that the charity regulator could publicise this on its website.
- More research and comparative analysis on de-risking from the perspective of global majority countries to develop more tailored solutions should be undertaken.

Significantly enhance collaboration between sectors

- Create TSGs where there are de-risking issues for NPOs, learning from existing practice in Nigeria, Netherlands, UK and US. Guidance and toolkits can be developed in order to help nascent TSGs.
- TSGs should engage with payment processors, mobile wallet providers and platforms, as they often facilitate transfers to local organisations. Developing dedicated processors for local NPOs could also be explored.
- Awareness of UNSC Resolution 2664, the FATF's Unintended Consequences Project, and Guidance on Recommendations 1 and 8 remains low amongst regulators. Governments, NPOs and FIs should engage regulators to raise awareness and provide targeted training.

Harness technology to improve financial access

- Fintech companies and NPOs using fintech solutions, including crypto wallets, should help educate local and international NPOs on the functionality and benefits of such solutions.
- Taking into account the specific needs of NPOs working in high-risk environments, fintech companies and NPOs should collaborate to develop tailored payment solutions for high-risk environments to ensure reliable services, reduce account freezes and streamline fund transfers.

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Appendix – Analysis of survey findings

A GLOBAL NGO NETWORK
FOR PRINCIPLED AND EFFECTIVE
HUMANITARIAN ACTION

Background

Through the networks of ICVA, VOICE, InterAction, Human Security Collective, and Charity and Security Network, a survey has been circulated to NGO partners, in English and French, to better understand the challenges faced by NGOs working in contexts impacted by sanctions and counter terrorism measures. Their insights will help shape the dialogue and promote solutions that ensure humanitarian efforts are not hindered by financial regulations.

The total number of respondents across both surveys is 23 (17 in English and 6 in French). Respondents represent a mix of local NGOs, INGOs, UN agencies, and other humanitarian actors. Over 60% carry out mainly humanitarian activities and 23% development activities; the remaining respondents are engaged in either coordination and capacity-building or human rights activities. This diversity ensures a comprehensive perspective, reflecting a wide range of operational scales and regional contexts.

Key insights and trends from respondents

1. **Financial access challenges are widespread**
   Over 60% of respondents reported significant obstacles stemming from sanctions or counterterrorism measures, with operational impacts such as frozen bank accounts, delayed fund transfers, and increased scrutiny from FIs. These barriers are pervasive, affecting organisations of all sizes and across all regions. Local organisations face particularly acute difficulties, often due to limited resources and influence within international regulatory frameworks.
2. **Short-term solutions are insufficient**
   The survey revealed a persistent reliance on temporary workarounds – such as financial intermediaries, informal cash transfers, or ad hoc partnerships – indicating a lack of sustainable, systemic solutions. Only 25% of respondents cited examples of effective compliance strategies, which were often context-specific and not easily scalable. This underscores the urgent need for tailored, durable frameworks that enable organisations to operate effectively while meeting regulatory requirements.

The findings underscore the critical need for clearer communication on sanctions and compliance policies, proactive engagement with FIs to address de-risking, and the development of innovative, secure financial solutions. Additionally, establishing structured platforms for NGOs to exchange insights and strategies will be key to overcoming these pervasive challenges.

Preliminary survey findings analysis

1. Sanctions and counterterrorism impact on operations

- **Findings:** About 60% of respondents report that sanctions or counterterrorism measures directly impact their ability to deliver humanitarian assistance. Specific issues cited include restrictions on accessing donor funds, constraints on operational reach, and delays in fund transfers.
- **Insight:** Smaller, local NGOs with limited resources face compounded difficulties. They are often less equipped to handle regulatory complexities, and restricted financial channels increase reliance on informal solutions, which could be less secure and efficient.

2. Challenges in transferring and receiving funds

- **Findings:** Approximately 70% of respondents reported issues with transferring or receiving funds. The main reasons include de-risking by FIs, rejected transactions, and heightened scrutiny, which significantly disrupts operations.
- **Insight:** The unpredictability of access to funds impacts not only operational continuity but also donor confidence. This creates a feedback loop where affected organisations may be seen as higher risk by financial partners, further diminishing funding prospects. Engaging with financial partners could foster better understanding and reduce these barriers.

3. Awareness and impact of UN Security Council Resolution 2664

- **Findings:** Around 80% of respondents were aware of the UN Security Council Resolution 2664, but only 10% noticed any changes in fund transfer challenges since its adoption. Over half of the respondents remain uncertain about any practical impact of the resolution on their work.
- **Insight:** The limited reported impact suggests challenges in operationalising this resolution's provisions. Awareness-building and specific communication on how the resolution supports humanitarian action could help organisations better leverage its protections.

4. Barriers faced in financial access

- **Findings:** Key barriers include:
  - **Complex regulatory frameworks** and inconsistencies in their implementation (cited by 65% of respondents);
  - **De-risking behaviours** by banks, often without clear explanations (55%);
  - **Limited resources** to comply with the necessary due diligence requirements (45%).

- **Insight:** These barriers demonstrate a need for clearer, standardised guidelines. The significant percentage of organisations citing these challenges suggests an urgent need for transparency between NGOs and regulatory bodies to foster smoother operations. Respondents often report relying on alternatives like financial intermediaries, which may introduce additional costs and risks.

5. **Frequency and examples of de-risking issues**

- **Findings:** Nearly 60% of respondents experience de-risking by banks 'frequently' or 'occasionally', affecting their ability to access necessary funds. Examples include rejected transfers, account freezes, and increased scrutiny without clear explanations from FIs.
- **Insight:** The frequency of these issues reveals how de-risking disrupts organisational stability and adds administrative burdens. A structured engagement platform for humanitarian organisations and FIs could help bridge the understanding gap.

6. **Strategies for overcoming fund transfer challenges**

- **Findings:** Roughly 40% of respondents have adopted alternative solutions to address fund transfer issues. These include partnering with international fiscal service providers (15%), using physical cash transfers (10%), and relying on partner organisations for transactions (15%).
- **Insight:** These workarounds indicate a stop-gap approach. While practical, they underscore the need for sustainable, compliant solutions that enable efficient fund access. Policy adjustments could help minimise reliance on these temporary fixes.

7. **Good practices and compliance strategies**

- **Findings**: Only about 25% of respondents report implementing successful strategies for managing compliance under sanctions. Notable practices include improved administrative procedures (10%) and niche financial solutions (5%).
- **Insight**: This limited sharing of successful practices points to a need for more organised platforms or spaces for humanitarian organisations, FIs, regulators and other stakeholders. By promoting knowledge-sharing on compliance strategies, organisations could collectively enhance resilience under restrictive regulations.

8. **Opportunities for collaboration**

- **Findings:** Over 70% of respondents suggest the following:
  - Creating multi-stakeholder working groups (35%);
  - Enhancing systematic information sharing (25%);
  - Exploring fintech solutions (10%).
- **Insight:** Building collaborative frameworks among NGOs, FIs, and regulators could improve resilience across the sector. Fintech solutions, while innovative, would need regulatory vetting to ensure compliance with international laws.

9. **Additional feedback and suggestions**

- **Findings:** Around 30% of respondents offered suggestions, such as:
  - Establishing funding plans for sanctions-affected organisations (10%);
  - Advocating for flexible regulatory interpretation (10%);
  - Increased resource allocation for compliance (10%).
- **Insight:** These suggestions highlight a need for adaptive regulatory frameworks that can support humanitarian needs while maintaining compliance. Respondents advocate for initiatives that provide them with resources to better navigate regulatory demands.

The Humanitarian Policy Group (HPG) is one of the world's leading teams of independent researchers and communications professionals working on humanitarian issues. It is dedicated to improving humanitarian policy and practice through a combination of high-quality analysis, dialogue and debate.

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