

WHAT IT TAKES TO SAFEGUARD CIVIC SPACE WHILE COUNTERING THE FINANCING OF TERRORISM

Lessons Learned From Sub-Saharan Africa



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ABBREVIATIONS

AML	anti–money laundering
CDFDH	Centre de Documentation et de Formation sur les Droits de l’Homme (Center for Documentation and Promotion of Human Rights)
CFT	countering the financing of terrorism
CIFOEB	Centre d’Information, de Formation et d’Etudes sur le Budget (Center for Information, Training and Studies on the Budget)
DPI	Defenders Protection Initiative
FATF	Financial Action Task Force
FIA	Financial Intelligence Authority (Uganda)
FIU	financial intelligence unit
GADC	Grupo de Ajuda para o Desenvolvimento Comunitário (Community Development Help Group)
GAPP	Groupe d’Action pour le Progrès et la Paix (Action Group for Progress and Peace)
GCTF	Global Counterterrorism Forum
GPF	Global Peace Foundation
HURIA	Human Rights Agenda
IDEG	Institute for Democratic Governance
ISDES	Institute for Security, Disaster and Emergency Studies
NGO Board	Non-Governmental Organizations Board (Kenya)
NPO	nonprofit organization

INTRODUCTION

This report adds to the growing analysis on a critical question: What does it take to safeguard civic space while countering the financing of terrorism? The report reflects the findings of a three-year initiative to equip civil society to engage with governments on countering the financing of terrorism (CFT) policy and practice, informed by good practices disseminated by the Global Counterterrorism Forum (GCTF), an informal, apolitical, multilateral counterterrorism platform.¹ A central component was the provision of seed funding and capacity development support to civil society organizations in Benin,

Burkina Faso, Côte d'Ivoire, Ghana, Kenya, Mozambique, Tanzania, Togo, and Uganda.

Following a competitive application process, 10 organizations participated in a series of trainings and peer exchanges and received ongoing guidance in the design, implementation, and evaluation of 12-month programs (table 1). Each program responded to its unique country context and included a combination of research, awareness raising, technical training, coalition building, policy advocacy, and multi-stakeholder dialogues.

Table 1. Civil Society Partners for the Initiative

PROGRAM LOCATION	PARTNER ORGANIZATIONS
Benin	Groupe d'Action pour le Progrès et la Paix
Burkina Faso	Centre d'Information, de Formation et d'Etudes sur le Budget
Côte d'Ivoire	Thinking Africa
Ghana	Institute for Democratic Governance
Ghana	Institute for Security, Disaster and Emergency Studies
Kenya	Human Rights Agenda
Mozambique	Grupo de Ajuda para o Desenvolvimento Comunitário
Tanzania	Global Peace Foundation
Togo	Centre de Documentation et de Formation sur les Droits de l'Homme
Uganda	Defenders Protection Initiative

This report collates partner experiences in program implementation and offers reflections on enabling conditions, factors of success, and frequent stumbling blocks. Fundamentally, the initiative reinforces the imperative that security policies and institutions must uphold human rights, protect civil liberties, and respect the rule of law. Without these conditions, civil society cannot safely engage in policy advocacy or meaningfully collaborate with the government on terrorism financing issues. Civil society also must be able to operate independently, including accessing the necessary resources,

and without fear of harassment and reprisal. Avenues of recourse are critical for challenging instances of misapplication or abuse of CFT measures and are contingent on having a fair, transparent, and accountable judicial system. From that baseline, further factors of success or constraint were identified at the level of program implementation (fig. 1).

The report opens with background on the intersection between CFT measures and civic space and summarizes key efforts by policymakers and multilateral bodies to respond to growing

¹ Global Counterterrorism Forum (GCTF), "Good Practices Memorandum for the Implementation of Countering the Financing of Terrorism Measures While Safeguarding Civic Space," September 2021, https://www.thegctf.org/Portals/1/Documents/Links/Meetings/2021/19CC11MM/CFT%20GP%20Memo/CFT%20Memo_ENG.pdf (hereinafter GCTF good practices memorandum). The GCTF is an informal, apolitical, multilateral counterterrorism platform. Its overarching mission is to reduce the vulnerability of people worldwide to terrorism by mobilizing expertise and resources to prevent, combat, and prosecute terrorist acts and counter incitement and recruitment to terrorism.

evidence of abuse and misapplication of CFT measures that disrupt and discourage civil society and humanitarian operations. Chapter 3 provides cross-cutting reflections on the goals, approaches, and strategies used by partners to equip local civil

society organizations to engage with government on CFT matters. Chapter 4 further elaborates the key factors of success and constraint, while Chapter 5 provides impact stories from each of the 10 partners.

Figure 1. Factors of Programmatic Constraint and Success

CONSTRAINTS AND ROADBLOCKS

Risk of engagement

Many partners noted an initial reluctance from civil society to participate in program activities. This reflects the fundamental reality that some governments are seen as a source of risk and insecurity for communities and civil society.

Low awareness or prioritization

Terrorism financing was not seen as the most pressing concern for many communities and therefore not a priority for civil society organizations. Some organizations also did not fully appreciate the potential for countering the financing of terrorism (CFT) measures.

Terrorism versus terrorism financing

Countries that had a longer history with terrorism-related violence tended to have more advanced CFT regimes, including a baseline governmental capacity that partners could leverage in program delivery. When such capacities did not exist, partners faced a compounded challenge of educating governmental authorities alongside civil society actors.

Resource limitations

Resource constraints are a significant barrier to the sustainability of efforts, especially when dialogue forums only exist at the impetus of civil society.

Instrumentalization

Partners noted that some governmental agencies were cautious in their engagement, willing to listen in forums but reluctant to share information and often stopping short of making concrete commitments. On paper, participation in dialogue forums can be framed as evidence of collaboration, when in practice it falls far short of good practice for meaningful partnership.

Political transition and repression

The prevailing political climate was either a motivating or constraining factor for partners. Although election-related crackdowns invigorated attention on safeguarding human rights and underscored program relevance in some cases, it also heightened sensitivities regarding engagement and influenced program decision-making and delivery methodologies.

Lack of data

Affected organizations are often wary of sharing their experiences because doing so risks inflaming governmental harassment, marring their reputation with donors and partners, or further jeopardizing financial access. Given the secrecy around counterterrorism and CFT measures, many organizations are also unable to pinpoint the specific cause for disruptions to their operations.

Private sector engagement

Only a few programs had participation from the private sector, despite outreach and engagement attempts by many partners. The absence of private sector actors leaves a key gap that hinders the practical identification of solutions, particularly related to de-risking and financial access challenges.

Figure 1. — cont.

FACTORS OF SUCCESS

Sensitization and trust building

Partners dedicated time and resources within their programs to sensitize and consult with government officials, often at the onset and throughout implementation. Bilateral, closed-door meetings were an especially effective strategy because they provided space for frank exchanges and trust building.

External pressure to progress

Public evaluations by international standard-setting bodies provided political pressure and a measure of oversight and accountability for outreach to and engagement with nonprofit organizations (NPOs). Yet, efforts to advance compliance with Financial Action Task Force Recommendation 8 did not always translate into willingness to engage on the intentional and unintended consequences of CFT measures on civic space and human rights.

Public discourse on misapplication

Within this initiative, government officials notably were more willing to discuss the negative impacts of CFT efforts in countries that had a history of publicly reported abuses attributable to those efforts. For civil society, publicity associated with those events raised awareness of the risk of CFT measures for NPOs and built a level of comfort and momentum for advocacy efforts.

Proactive engagement and preparedness

Partners described the value of equipping civil society with the tools and skills to proactively identify CFT measures that would disrupt and discourage operations and of having established channels of engagement with government that can be leveraged to challenge draft measures before adoption.

Identifying champions

It can be daunting for civil society to understand the interplay of responsibilities and to find partners that are willing to collaborate credibly and meaningfully. Several lines of engagement often are required to comprehensively respond to the many avenues through which CFT measures affect civil society.

Meaningful and practical collaboration

There was support for collaboration between government and civil society on CFT measures across the focus countries, but partners had to create practical channels to realize that collaboration in a meaningful way.

Working groups and consortiums

Consistent, sustained forums for exchange help build expertise among stakeholders, which in turn drives targeted advocacy efforts, identifies opportunities for proactive engagement, and provides a support system for NPOs that are negatively affected by CFT measures.

BACKGROUND

CFT measures can result in a variety of negative consequences for civil society and humanitarian actors. States can deploy CFT measures to target human rights defenders, journalists, watchdogs, and advocacy groups. Examples include bank account freezes, politically motivated detentions, harassment, prosecution, “lawfare” attacks,² and intelligence fishing and scraping under the guise of combating illicit and terrorism financing.³

In other cases, CFT measures are misapplied or overapplied in a manner that disrupts and discourages nonprofit organization (NPO) operations. Arduous registration practices, intrusive audit and reporting requirements, and restrictions on foreign funding significantly hinder NPOs, causing a chilling effect on freedoms of expression and association.⁴ Lingering misperceptions about the NPO sector as being inherently higher risk for terrorism financing abuse contribute to delays in processing transactions or the closure of bank accounts, a practice known as de-risking,⁵ which particularly impacts women’s organizations and hampers gender equality.⁶ Legal requirements for NPOs to acquire or utilize a traditional bank account make the private sector de facto gatekeepers of nonprofit status in practice.⁷

The implementation of counterterrorism-related sanctions creates additional complexities for humanitarian actors operating in contexts where designated terrorist groups overlap with and operate

alongside multiple actors in conflict. CFT policies create fundamental conflicts for the delivery of humanitarian aid in accordance with the principles of neutrality, impartiality, and independence. They also affect organizational practices and decision-making, resulting in, for example, self-censorship, increased administrative costs, and delays in distributing critical resources.⁸

International bodies have increasingly recognized and sought to mitigate the impact of CFT measures on NPO and humanitarian operations. UN Security Council Resolution 2462 calls for states to uphold their obligations under international human rights law, international humanitarian law, and international refugee law while countering the financing of terrorism and to take into account the consequences of CFT measures on principled humanitarian action. Resolution 2664 introduces a humanitarian carve-out to UN sanctions regimes, albeit with a sunset clause for sanctions relating to counterterrorism sanctions.

The key international standard-setting body on CFT matters, the Financial Action Task Force (FATF), launched a project in 2019 to study and mitigate the unintended consequences of its standards. The study focused on de-risking, financial exclusion, undue targeting of NPOs, and curtailment of human rights, with a focus on due process and procedural rights.⁹ One outcome of the study was a technical revision of the FATF standard,

² Lawfare refers to the use or misuse of legal action for political purposes, namely to inflict damage on an opponent rather than making a legal argument or using evidence to prove facts of a case. See Kay Guinane, “The Alarming Rise of Lawfare to Suppress Civil Society: The Case of Palestine and Israel,” *Charity & Security Network*, September 2021, p. 7, <https://charityandsecurity.org/wp-content/uploads/2021/09/The-Alarming-Rise-of-Lawfare-to-Suppress-Civil-Society.pdf>.

³ Stephen Reimer, “Weaponisation of the FATF Standards: A Guide for Global Civil Society,” *Royal United Services Institute*, 2024, <https://static.rusi.org/weaponisation-of-fatf-standards-a-guide.pdf>.

⁴ Lana Baydas and Shannon N. Green, eds., “Counterterrorism Measures and Civil Society: Changing the Will and Finding the Way,” *Center for Strategic and International Studies*, March 2018, https://cis-website-prod.s3.amazonaws.com/s3fs-public/publication/180322_CounterterrorismMeasures.pdf.

⁵ Tracey Durner and Liat Shetret, “Understanding Bank De-Risking and Its Effects on Financial Inclusion,” *Global Center on Cooperative Security*, November 2015, <https://globalcenter.org/resource/understanding-bank-de-risking-and-its-effects-on-financial-inclusion/>.

⁶ Duke Law International Human Rights Clinic and Women Peacemakers Program, “Tightening the Purse Strings: What Countering Terrorism Financing Costs Gender Equality and Security,” March 2017, <https://law.duke.edu/sites/default/files/humanrights/tighteningpursestrings.pdf>.

⁷ Asia/Pacific Group on Money Laundering and Global Center, “Protecting Non-Profit Organizations From Terrorism Financing Abuse: Successes, Challenges, and Lessons Learned From the Asia Pacific Region,” October 2023, <https://globalcenter.org/wp-content/uploads/Protecting-Non-Profits-from-Terrorism-Financing-Abuse-Digital.pdf>.

⁸ Emma O’Leary, “Principles Under Pressure: The Impact of Counterterrorism Measures and Preventing/Countering Violent Extremism on Principled Humanitarian Action,” *Norwegian Refugee Council*, June 2018, https://www.nrc.no/globalassets/pdf/reports/principles-under-pressure/nrc-principles_under_pressure-report-2018-screen.pdf.

⁹ Financial Action Task Force (FATF), “High-Level Synopsis of the Stocktake of the Unintended Consequences of the FATF Standards,” 27 October 2021, <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Unintended-Consequences.pdf.coredownload.inline.pdf>.

known as Recommendation 8, meant to protect NPOs from terrorism financing abuse.¹⁰ Adopted in 2023, the revision aims to clarify misinterpretations of the standard and reaffirm that CFT measures should not unduly disrupt or discourage legitimate NPO operations.¹¹

In March 2020, the GCTF announced an endeavor titled “Ensuring the Implementation of CFT Measures While Safeguarding Civic Space,” co-led by the Kingdom of the Netherlands, the Kingdom of Morocco, and the United Nations and implemented by the Global Center on Cooperative Security. Through a series of multi-stakeholder dialogues and consultations with more than 100 practitioners, the GCTF developed a good practices memorandum on the implementation of CFT legal and policy frameworks, assessing the risk of NPO abuse for terrorism financing, de-risking and challenges to accessing financial services, and advancing and sustaining multi-stakeholder dialogue to safeguard civic space in the CFT context.¹²

The GCTF memorandum identified a critical need for locally led efforts to build inclusive, effective partnerships between government and civil society on the design, implementation, and evaluation of CFT measures. The initiative described in this report responds to that need by providing capacity development support and funding to national civil society organizations, leveraging the good practices identified in the GCTF memorandum. The initiative focused on East and West Africa as regions that have experienced high levels of terrorist activity and where states are actively engaging in efforts to prevent and combat terrorism financing. Within these regions, focus countries for the program were selected based on three primary criteria:

1. **Need.** Research indicates CFT measures are or could be contributing to reduction in civic space, infringement of human rights, and challenges to the timely access of financial services by NPOs and humanitarian actors. Need was assessed through consultations with local and international experts, as well as a review of media reports and relevant grey literature.
2. **Opportunity.** There were entry points for NPOs to engage with government on CFT matters, such as processes to develop or refine CFT measures and evaluate potential risk of terrorism financing abuse of NPOs. Compliance with FATF Recommendation 8 was a key component of assessing opportunity, including what gaps were identified, whether countries had made a high-level political commitment to improving compliance, and the scope and scale of existing outreach from government to the nonprofit sector.
3. **Environment.** Implementation of CFT measures is affected by the general environment for human rights and freedom of expression, which is shrinking globally alongside a rise in reprisals against civil society. Data from several global indices, including Freedom House’s Global Freedom Index and the International Center for Not-for-Profit Law’s Civic Freedom Monitor, were consulted to assess whether partner organizations would be able to safely and effectively engage with government. Consideration was also given to the operational space and capacities of the nonprofit sector as evaluated by the U.S. Agency for International Development’s Civil Society Sustainability Index (table 2).

¹⁰ FATF, “International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation: The FATF Recommendations,” November 2023, <https://www.fatf-gafi.org/content/dam/fatf-gafi/recommendations/FATF%20Recommendations%202012.pdf.coredownload.inline.pdf>.

¹¹ FATF, “Protecting Non-profits From Abuse for Terrorist Financing Through the Risk-Based Implementation of Revised FATF Recommendation 8,” 16 November 2023, <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/protecting-non-profits-abuse-implementation-R8.html>.

¹² GCTF good practices memorandum.

Table 2. Human Rights and Related Assessment Indicators for Focus Countries

COUNTRY	GLOBAL FREEDOM STATUS, 2024 ^a	CIVIL SOCIETY ORGANIZATION SUSTAINABILITY INDEX, 2021 ^b	CIVICUS MONITOR, 2023 ^c	GLOBAL TERRORISM INDEX, 2023 ^d	FATF RECOMMENDATION 8 RATING ^e
Benin	Partly Free (61)	4.3	Obstructed (47)	4.898	Noncompliant
Burkina Faso	Not Free (27)	4.5	Obstructed (46)	8.571	Partially Compliant
Côte d'Ivoire	Partly Free (49)	4.8	Obstructed (54)	2.06	Noncompliant
Ghana	Free (80)	4.2	Obstructed (55)	0	Partially Compliant
Kenya	Partly Free (52)	3.9	Obstructed (50)	5.616	Noncompliant
Mozambique	Partly Free (44)	4.8	Repressed (39)	6.267	Noncompliant
Tanzania	Partly Free (36)	4.3	Repressed (32)	2.267	Noncompliant
Togo	Partly Free (42)	n/a	Repressed (39)	4.670	Partially Compliant
Uganda	Not Free (34)	4.6	Repressed (30)	4.377	Partially Compliant

^a Freedom House assigns numerical ratings on a scale of 0 (not free) to 100 (free) based on an assessment of the condition of political rights and civil liberties around the world. See Freedom House, "Freedom in the World 2024," February 2024, https://freedomhouse.org/sites/default/files/2024-02/FIW_2024_DigitalBooklet.pdf.

^b The Civil Society Organization Sustainability Index, which has been funded by the U.S. Agency for International Development for the past 25 years, assesses the strength and viability of the civil society organization sector in 73 countries. A panel of civil society organizations scores countries across seven dimensions, with 0 representing a healthy and vibrant sector and 7 reflecting an impeded and constrained sector. See U.S. Agency for International Development, "CSO Sustainability Index Monitor," n.d., <https://csosi.org/> (accessed 6 November 2024).

^c The CIVICUS Monitor is a research tool that provides close to real-time data on the state of civil society and civic freedoms in 196 countries. The data are generated through a collaboration with more than 20 civil society research partners and input from a number of independent human rights evaluations. See CIVICUS, "CIVICUS Monitor," n.d., <https://monitor.civicus.org/> (accessed 24 October 2024).

^d The Global Terrorism Index is produced using data from Terrorism Tracker and other sources. It reflects a composite measure made up of four indicators: incidents, fatalities, injuries, and hostages. See Institute for Economics and Peace, "2023 Global Terrorism Index," n.d., <https://www.visionofhumanity.org/maps/global-terrorism-index/#/> (accessed 15 September 2024).

^e Financial Action Task Force, "Consolidated Assessment Ratings," 19 September 2024, <https://www.fatf-gafi.org/en/publications/Mutualevaluations/Assessment-ratings.html>.

PROGRAM CONTEXT AND DESIGN

The initiative sought to advance policies and practices that safeguard civic space, human rights, humanitarian action, and access to financial services while countering the financing of terrorism. To advance this goal within their respective national contexts, partners primarily focused on equipping civil society actors to engage with government on CFT matters.

This decision reflects a relatively low level of CFT awareness within the nonprofit sectors of the focus countries. Partners described the impact of low awareness in several ways.

- Underappreciation of the relevance of CFT topics to their work
- Failure to link disruptions of their work to CFT policy and practice
- Risk that failure to comply with CFT obligations would trigger governmental crackdowns on NPO operations and civic space
- Perceived inability of NPOs to contribute to CFT discussions, given the technical nature of the issue and its steep learning curve
- Unfamiliarity with entry points and opportunities for engagement on CFT measures, such as risk assessment or evaluations of compliance with FATF standards
- Fragmented governmental engagement practices, often centralized in a core group of experienced and typically larger organizations headquartered in capital cities

All 10 of the partners' programs included some form of training for NPOs on international and domestic CFT frameworks, terrorism financing risks for NPOs, and risk mitigation obligations and good practices. In some cases, trainings were co-delivered by partner organizations and government officials, such as financial intelligence units (FIUs), NPO regulators, or both. In those instances, bilateral sensitization meetings at the onset of the program helped to build trust and rapport, prior to engaging governmental partners in training delivery.

Some partners prioritized basic trainings in multiple locations, including outside of the capital, to reach a wider set of NPOs. Others focused on developing multipart training courses that fostered a depth of learning within a smaller cohort of participants. Three programs paired targeted trainings with broad-scale awareness-raising campaigns, for example via traditional and social media and the development of educational materials such as booklets, posters, and fliers using simplified, nontechnical language.

Trainings notably tended to prioritize helping NPOs identify and manage potential terrorism financing risks. Two programs further invested in this element by crafting template policy statements and guidance materials specifically to assist NPOs in improving internal risk management practices. Foundational knowledge on risk mitigation is important for preparing civil society to engage in CFT policy discourse, but it also reflects a "safer" space for program delivery. FATF Recommendation 8 calls for government to conduct outreach and educational programs for NPOs that may face terrorism financing risks. By focusing on trainings, partners were able to position their programs as mutually beneficial to an established governmental priority of deepening compliance with Recommendation 8.

For some, an initial focus on risk mitigation training paved the way for more sensitive dialogues on the abuse and misapplication of CFT measures. Seven of the 10 programs included activities to create and expand spaces for civil society to engage with government on CFT issues. These typically took the form of roundtable meetings with NPOs, FIUs, NPO regulators, law enforcement, and counterterrorism officials. Discussions focused on the rationale for CFT measures, concerns about the impact of their implementation on civic space, and opportunities for NPOs to participate in CFT-related processes such as national risk assessments, mutual evaluations, or legal revisions.

Some partners timed roundtables to the start of the program, as a way of securing political buy-in and support for subsequent efforts. Others positioned roundtables as the culminating activity, allowing civil society actors to leverage knowledge from prior training efforts. For the most part, these exchanges were described as fruitful. Some partners indicated a hesitancy on the part of the government to share information or make formal commitments,

but the forums were seen as successful in drawing attention to civic space concerns and opening lines of communication around avenues of collaboration.

Six programs featured a research component, such as baseline assessments of stakeholder capacities, analysis of legal and regulatory frameworks, and data collection on instances of CFT interference with civic space, civil liberties, or NPO operations. In some cases, validation workshops were held to solicit input and foster consensus building on report findings prior to finalization.

Although partners rarely targeted policy reform as the primary objective of their work, four of the programs did generate advocacy products. These include strategies and resilience plans for civil society, policy recommendations for government, and the formation of standing NPO working groups. The ability to mobilize advocacy efforts was contingent on having sufficient capacity within the nonprofit community, safe and protected spaces for advocacy to occur, and the willingness of government to engage and receive feedback. Notably, policy reform is an ambitious goal for programs that are constrained to 12-month implementation timelines.



Civil society partners convene in Nairobi, Kenya (December 2022) (top and bottom right), and Accra, Ghana (February 2023) (bottom left and center), to share experiences on program implementation. Photo credit: Global Center staff.

WHAT IT TAKES TO SAFEGUARD CIVIC SPACE IN CFT EFFORTS

Over the three-year initiative, partners convened at regular intervals to reflect on experiences, troubleshoot solutions, and share lessons learned in program implementation. As the initiative progressed, 75 percent of partners identified direct or indirect impacts of CFT laws and policies on their operations. Partners also identified several conditions that enabled or constrained their work to safeguard civic space, as well as programmatic factors that influenced success. This section seeks to capture those reflections and contributes to the growing dialogue on a key question: What does it take to safeguard civic space in CFT efforts?

CONSTRAINTS AND ROADBLOCKS

The landscape of promoting and protecting human rights while countering terrorism and its financing is fraught, sensitive, and dynamic. Although capturing successes is important, it can be equally instructive to reflect on challenges and roadblocks. The FATF has recently adopted this approach, including for the first time examples of how not to implement Recommendation 8 in its guidance on protecting NPOs from terrorism financing abuse.¹³ This report seeks to add to that discourse by sharing reflections at the point of program implementation. Through candid discussion with partners, the report captures strategic and operational challenges experienced by civil society as they lead efforts to deepen engagement with governmental actors.

1. Risk of engagement. Many partners noted an initial reluctance from civil society to participate in program activities. This reflects the fundamental reality that many governments are seen as a source of risk and insecurity for communities and civil society. Terrorism financing is a politically sensitive issue that can and often does attract unwanted attention for an NPO. Such concerns are not just limited to advocacy or human rights actors. Admitting a lack of familiarity with CFT obligations can expose an organization to scrutiny from regulators and CFT authorities, leading many to exercise caution when seeking training or support. There are also reputational risks because engaging

on CFT issues can involve a degree of cooperation or at least association with governmental agencies. In places where communities have fractured relationships with government, real and perceived associations with government can threaten the credibility of civil society actors among their stakeholders, peers, and beneficiaries.

2. Low awareness and prioritization. In some countries, terrorism financing was not seen as the most pressing concern for many communities or a key priority of civil society. Some organizations also did not fully appreciate the potential for CFT measures to affect their operations. Awareness-raising campaigns are helpful in addressing the relevance question but run the risk of contributing to a false narrative that all NPOs face some level of terrorism financing risk. Identifying which NPOs would most benefit from training, advocacy, and network building on CFT measures was difficult for partners, especially in countries where risk factors associated with terrorism financing abuse of NPOs had not been identified or were based on perception rather than evidence.

3. Countering terrorism versus terrorism financing. The initiative found that a country's level of exposure to terrorist activity often affected governmental capacities and prioritization of terrorism financing issues. Yet, it was not always the case that countries suffering active terrorism operations within their borders were the most engaged on terrorism financing issues. Countries that had experienced a recent escalation of violence often had not yet invested in a robust CFT architecture, presumably because priority was given to kinetic and tactical counterterrorism measures. Countries that had a longer history with terrorism-related violence tended to have more robust CFT frameworks, including a baseline governmental capacity that partners could leverage in program delivery. When such capacities did not exist, partners faced a compounded challenge of educating governmental authorities alongside civil society actors.

¹³ FATF, "Best Practices: Combating the Terrorist Financing Abuse of Non-profit Organisations," November 2023, <https://www.fatf-gafi.org/content/dam/fatf-gafi/guidance/BPP-Combating-TF-Abuse-NPO-R8.pdf.coredownload.inline.pdf>.

4. Resource constraints. Every partner lamented the lack of available resources to adequately equip civil society to engage with government on CFT measures. In some cases, the demand for training and access to program activities far outweighed the available budget. In others, resource constraints meant that partners had to prioritize certain actors, regions, or topics over others, despite often interrelated and equally compelling needs. Resource constraints are also a significant barrier to the sustainability of efforts, especially when dialogue forums only exist at the impetus of civil society. In general, focus countries for this initiative face resource constraints within CFT regimes and often are heavily reliant on international funding to support training, outreach, and engagement efforts. Countries are encouraged to prioritize resources to areas of greatest risk, which typically do not include the nonprofit sector where evidence of abuse is significantly less than in the traditional banking sector. On one hand, this created an opportunity for civil society to craft and drive engagement efforts, but on the other it shifted responsibility to a nonprofit sector already stretched for human and resource investments.

5. Instrumentalization. The inclusion of evaluation criteria on NPO outreach and engagement under FATF Recommendation 8 is an important step toward realizing meaningful civil society participation in CFT measures and avoiding their abuse to constrain civil liberties. Yet, it can also contribute to a “tick the box” approach to engagement that instrumentalizes civil society. Partners noted that some governmental agencies were cautious about contributing to dialogue forums or willing to listen but reluctant to share information or make concrete commitments. On paper, governments’ inclusion of civil society in CFT meetings can be used to indicate collaboration, when in practice it falls short of meaningful partnership. Similar concerns are noted regarding the prioritization of risk mitigation training, which emphasizes a one-way transfer of knowledge from CFT authorities to NPOs. As described above, the ability of training forums to address the unintended consequences of CFT measures varied across programs.

6. Political transitions and repression. The prevailing political climate was either a motivating or constraining factor for partners. In some cases, elections or political transitions stalled program delivery because institutional and political leadership changed and new sensitization efforts were required. Although in some cases election-related crackdowns invigorated attention on safeguarding human rights and underscored program relevance, they also heightened sensitivities around engagement and influenced program decision-making and delivery methodologies.

The same is true for two countries where program implementation coincided with the tabling of draft legislation that was determined to threaten human rights, civil liberties, or NPO operations.

7. Lack of data. Partners in this initiative were not immune to the global challenge of collecting data on the scope and scale of CFT abuses and misapplications. Affected organizations are often wary of sharing their experiences because it runs the risk of inflaming governmental harassment, marring their reputation with donors and partners, and further jeopardizing financial access. Given the secrecy around counterterrorism and CFT measures, many organizations are also unable to pinpoint the specific cause for disruptions to their operations. Presently, there is no international body specifically mandated to collate instances of human rights abuse and infringements of civil liberties conducted under the guise of counterterrorism or terrorism financing measures. Without empirical data, some authorities continue to challenge the scope and scale of CFT impacts on civil society or shift the blame to other actors, such as the private sector.

8. Private sector engagement. A small number of programs saw participation from the private sector, despite outreach and engagement attempts by many partners. Identifying the appropriate individuals within the private sector to participate can be difficult. Where participation was secured, it was often in training activities where financial institutions saw a benefit in deepening their understanding of terrorism financing risks within a specific jurisdiction. Private sector actors were generally less inclined to discuss the consequences of CFT measures. The absence of private sector actors leaves a key gap that hinders the practical identification of solutions, particularly related to de-risking and financial access challenges.

FACTORS OF SUCCESS

Fundamentally, there must be a conducive environment in which security policies and institutions uphold human rights, protect civil liberties, and respect the rule of law. Without these conditions, civil society cannot safely engage in policy advocacy or meaningfully collaborate with government on terrorism financing issues. Avenues of recourse also must be available to challenge instances of misapplication or abuse, which is contingent on having a fair, transparent, and accountable judicial system. In addition, civil society must be able to operate independently, with access to the necessary resources and without fear of harassment and reprisal. Civil society spends significant time and resources advocating for

these conditions, yet civic space continues to shrink globally, and reprisals are rising.¹⁴

Although significant variations exist within the focus countries, it was determined at the onset that the domestic context in the focus countries was sufficiently conducive to impactful program delivery, as described in the Background chapter. From that baseline, partners identified the following factors that enabled or contributed to program successes.

1. Sensitization and trust building. Countering terrorism and its financing is seen as predominately the responsibility of states. Spaces for collaboration and willingness to engage with civil society in counterterrorism and CFT measures are often limited and can come with significant risk for civil society actors.¹⁵ Those that can engage often navigate complex and delicate landscapes with several governmental agencies simultaneously, at the policy and practice levels. Partners dedicated time and resources within their programs to sensitize and consult with government officials, often at the inception and throughout implementation. Early sensitization on the program's objectives and activities was described as good practice by all partners. For some, it was also a de facto requirement to deliver the program without interference or heightened scrutiny from government given the sensitivities around terrorism financing. By informing and consulting the government, partners were able to build trust, reaffirm shared objectives, and secure formal or informal endorsements for program delivery. Bilateral, closed-door meetings were an especially effective strategy because they provided space for frank exchanges, perspective sharing, and consensus building.

2. External pressure to progress. There were variations in the level and nature of governmental engagement in program delivery. Countries that were actively addressing compliance gaps with FATF Recommendation 8 were more likely to be open to collaboration with civil society. This was particularly true for countries that were in the process of conducting or updating NPO risk assessments and to some degree countries that were commencing revisions to legal or regulatory frameworks. In these contexts, the progress reports required by FATF provided political pressure and a measure of oversight and accountability for NPO outreach

and engagement. Yet, efforts to advance compliance with Recommendation 8 did not always translate into willingness to engage on the intentional and unintended consequences of CFT measures on civic space and human rights.

3. Public discourse on misapplication. Within this initiative, government officials were notably more willing to discuss the negative impacts of CFT efforts in countries that had a history of publicly reported CFT abuses. Court cases challenging instances of abuses provide a legal footing for ensuring CFT measures remain consistent with human rights and the rule of law. Public-facing advocacy campaigns, coupled with rebukes from international and multilateral partners, were described as shaming and thereby influencing governmental positions on civil society engagement. For civil society, publicity associated with those events raised awareness of the risk of CFT measures for NPOs and built a level of comfort and momentum for advocacy efforts.

4. Proactive engagement and preparedness. Partners underscored the value of proactive awareness raising, capacity building, and networking initiatives. Scrutiny on instances of CFT abuse or misapplication can trigger dialogue, but it also puts civil society on the back foot. In those instances, time and resources had to be focused on responding to challenges rather than delivering on organizational missions. Partners described the importance of equipping civil society to proactively identify CFT measures that would disrupt and discourage operations and of having established channels of engagement with government that can be leveraged to challenge draft measures before adoption.

5. Identifying champions. A myriad of governmental entities play a role in CFT policy and practice, including policymakers, FIUs, NPO regulators, law enforcement, prosecution and judicial actors, and counterterrorism coordination bodies. It can be daunting for civil society to understand the interplay of responsibilities and to find partners who are credibly and meaningfully willing to collaborate. Several lines of engagement often are required to respond comprehensively to the many avenues through which CFT measures affect civil society. Within this initiative, partners primarily prioritized engagement with

¹⁴ CIVICUS, "Rights Reversed: A Downward Shift in Civic Space (2019-2023)," January 2024, https://civicsmonitor.contentfiles.net/media/documents/RightsReversed_2019to2023.pdf.

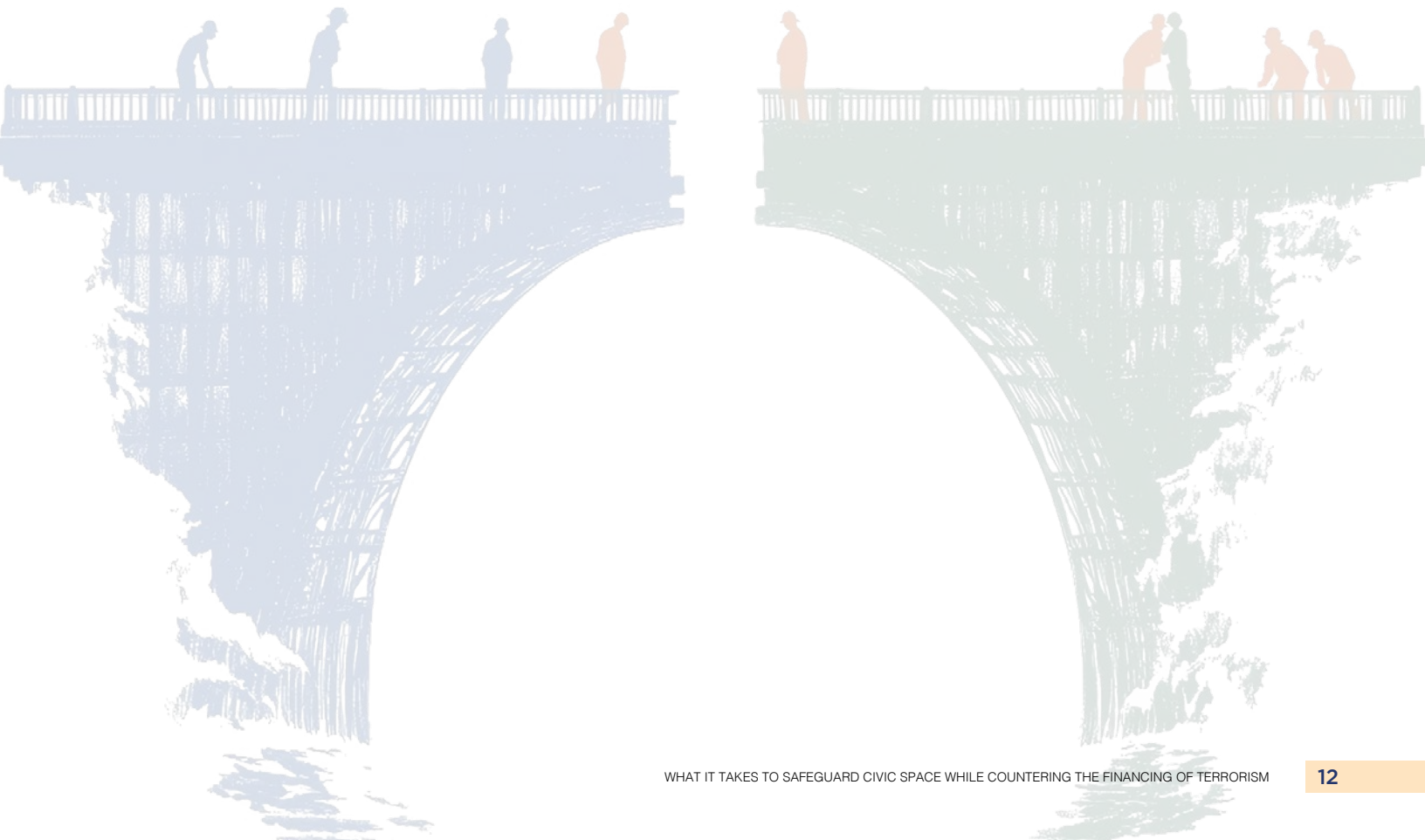
¹⁵ Fionnuala Ní Aoláin, Megan L. Manion, and Alyssa T. Yamamoto, "Global Study on the Impact of Counter-Terrorism on Civil Society and Civic Space," UN Human Rights Special Procedures, n.d., https://defendcivicspace.com/wp-content/uploads/2024/01/SRCT_GlobalStudy-1.pdf.

FIUs and NPO regulators. In cases where these entities become collaborators and champions of the program, partners were able to leverage those relationships to expand the reach of program activities and outcomes across other governmental stakeholders. This type of equitable collaboration can also benefit government because it can work with identified NPO partners to identify, engage, and build trust with NPOs that may be otherwise wary of engaging with security and regulatory authorities. Trust building often must occur on both sides before meaningful, inclusive collaboration can be realized.

6. Meaningful and practical collaboration. There was support for collaboration between government and civil society on CFT matters across the focus countries, but partners had to create practical channels to realize that collaboration in a meaningful way. Often, this came in the form of collaborative co-development of program and training materials. Collaborative development was seen as adding technical value, helping ensure a comprehensive curriculum that featured both human rights and CFT frameworks participants. Similar value was noted for collaborations between civil society actors. For example, many programs convened focus groups or conducted baseline capacity assessments to identify training needs

among the target beneficiaries. Some held pilot trainings with participant satisfaction and facilitator assessments being used to inform revisions to training content, group exercises, or facilitation methodologies.

7. Working groups and consortiums. Partners underscored the value of having consistent, independent, and sustained forums to exchange experiences and challenges among civil society as they relate to CFT measures. Working groups help build expertise among stakeholders, which in turn drives targeted advocacy efforts, identifies opportunities for proactive engagement, and provides a support system for NPOs that are negatively affected by CFT measures. For government, having an NPO working group or relationships with umbrella organizations helped alleviate practical barriers to engagement because it provided a dedicated entity with whom to consult and a centralized mechanism for collecting input or distributing information. Partners noted some concerns regarding working groups, including their tendency to privilege larger, well-connected organizations that typically are geographically clustered in the capital region. Transparency, inclusivity, and adequate resourcing were therefore described as important to ensuring a credible, representative working group.



IMPACT CASE STUDIES

THIS CHAPTER PROVIDES BRIEF SUMMARIES OF THE 10 PROGRAMS IMPLEMENTED UNDER THIS INITIATIVE. IT FOCUSES ON HOW EACH ORGANIZATION TAILORED ITS APPROACH AND CRAFTED ACTIVITIES TO ADDRESS THE UNIQUE NEEDS AND EXPERIENCES WITHIN ITS JURISDICTION.

BENIN — Groupe d'Action pour le Progrès et la Paix

The Groupe d'Action pour le Progrès et la Paix (GAPP, Action Group for Progress and Peace) focused on equipping civil society organizations in Benin with the knowledge and opportunities to engage the government on the protection of civic space while countering the financing of terrorism.

GAPP conducted an assessment of the domestic legal framework for protecting NPOs from terrorism financing abuse. During a validation workshop, GAPP gathered feedback on the draft assessment from civil society and key governmental agencies, including the Beninese Human Rights Commission, the Benin Association of Banks and Financial Institutions, and the National Financial Information Processing Unit.

The assessment determined that Benin largely has adopted international frameworks related to countering the financing of terrorism but has not appropriately tailored measures for the nonprofit sector, which presents a risk that CFT measures may infringe on freedom of association. This aligns with the findings of Benin's mutual evaluation of compliance with FATF standards, which rated the country to be "not compliant" on Recommendation 8.

Benin considers NPOs to be reporting entities, which contradicts FATF guidance stipulating that only a subset of NPOs should be subject to CFT obligations. As such, risk mitigation measures are applied universally rather than proportionally to the level of risk that an NPO may experience. The GAPP assessment found that some of these obligations, notably financial reporting requirements, are overly burdensome and discourage organizations from accessing foreign funding. The assessment concludes that risk mitigation efforts are undermined by a lack of sustained, credible outreach and dialogue between government and civil society. Without effective collaboration, NPOs are unaware of potential terrorism financing risks and obligations and are unable to meaningfully participate in policy dialogue to ensure CFT measures are not infringing on human rights and civil liberties enshrined in the constitution of Benin.



Workshop with civil society organizations in Benin on safeguarding civic space while countering the financing of terrorism. Photo credit: GAPP staff.

Based on this finding, GAPP developed a training tool kit to raise civil society awareness on the legal framework and mechanisms for countering the financing of terrorism while protecting civic space. The tool kit underwent an iterative development process that solicited feedback from civil society, private sector, and governmental actors. The approach helped anchor the training content to the needs of its intended beneficiaries and fostered buy-in on the importance of expanded, sustained awareness-raising programs.

GAPP organized workshops across Benin, including in Cotonou, Bohicon, and Parakou, to disseminate the legal assessment and deliver the training package to 84 civil society representatives. Training sessions enhanced participant understanding of terrorism financing issues, but also the ways in which CFT measures can be misapplied or abused to shrink civic space. For example, the Parakou workshop included case studies of abuse suffered by civil society organizations in light of the sensitive security situation in northern Benin.

As a result of the training, civil society participants developed an action plan to mobilize efforts around the protection of civic space in CFT measures. The plan also provided recommendations to government on outreach and engagement efforts, articulating training needs and desired methodologies for meaningful outreach and engagement.

BURKINA FASO – Centre d’Information, de Formation et d’Etudes sur le Budget

Centre d’Information, de Formation et d’Etudes sur le Budget (CIFOEB, Center for Information, Training and Studies on the Budget) led a program to advance public policies and practices that protect civic space while countering the financing of terrorism in the context of prevailing insecurity in Burkina Faso. Overall, the program directly engaged 160 individuals while traditional and social media reports further amplified the program’s reach.

As part of the program, CIFOEB led an awareness-raising session for civil society on the legal framework for countering the financing of terrorism in Burkina Faso, best practices for preventing terrorism financing abuse of NPOs, and CFT obligations for NPOs. The training was convened by CIFOEB and facilitated by representatives from the Economic and Financial Public Prosecutor’s Office and the General Directorate of Public Liberties and Political Affairs within the Ministry of Territorial Administration and Decentralization. Presenters used the opportunity to highlight ongoing governmental efforts related to NPOs and countering the financing of terrorism, including a sectoral risk assessment, decentralization of the registration database, and planning for a permanent consultative forum with NPOs on CFT matters. Participants were provided with a booklet summarizing the training content, which was further disseminated through an umbrella organization for civil society in the country.

A policy dialogue was then convened with civil society and relevant CFT officials. It featured a collaborative assessment of the strengths and weaknesses of Burkina Faso’s CFT regime, as well as exchanges on the challenges and strategies for balancing terrorism financing measures with the protection of civic space. Participants shared instances when CFT measures had restricted civic space and civil liberties and highlighted examples of how such measures could discourage or disrupt NPO operations, such as cumbersome due diligence and transaction reporting requirements. The dialogue served to reinforce the synergy of actions between state and nonstate actors, coming at a critical moment as Burkina Faso was developing strategies to enhance its compliance with FATF Recommendation 8, on which it had been rated “partially compliant” in its mutual evaluation.

The dialogue concluded with the formulation of 20 recommendations aimed at improving the national anti-money laundering and countering the financing of terrorism (AML/CFT) framework while preserving civic space. A number of the project’s recommendations were adopted in the government’s action plan for 2024–2026, including the inclusion of civil society in the revision of national CFT laws and dissemination of a compendium of resources on countering the financing of terrorism to centralize information for civil society actors.

Additionally, CIFOEB developed an index to measure the state of civic space in Burkina Faso. This index considers several dimensions such as freedom of information and expression, freedom of assembly and association, citizen participation, nondiscrimination/inclusion, and human rights. It is an ex post evaluation that took place in 2023 and covered 2020–2022. The index revealed a shrinking civic space, moving from an “obstructed” level in 2020 to a “repressed” level in 2021 and 2022, highlighting the challenges faced by civil society in the current context.

A core strength of the program was its participatory and co-creation approach between government and civil society. The approach fostered a common understanding, enabled the sharing of perspectives and experiences, and helped address the trust deficit that can complicate dialogue on sensitive matters such as the intersection of counterterrorism efforts and human rights. The co-creation process was a factor in the sustainability, if not the acceptance, of the results by all stakeholders.



Participants at a policy dialogue on balancing terrorism financing measures with the protection of civic space in Burkina Faso. Photo credit: CIFOEB staff.

CÔTE D'IVOIRE — Thinking Africa

Thinking Africa's program focused on deepening NPO understanding of the legal framework and mechanisms for countering the financing of terrorism in Côte d'Ivoire. It included a three-part capacity development series on the proportionate implementation of CFT laws and risk mitigation measures for NPOs.

The first course provided a baseline understanding of terrorism in West Africa, including the trajectory of terrorism threats, classic and new forms of terrorism financing, and an overview of collaborative approaches to risk mitigation for government and civil society. The second session focused on the evolution of the legal framework for countering the financing of terrorism in Côte d'Ivoire and highlighted current obligations for NPOs. The third course emphasized interactive sessions on options and strategies to reform the institutional and legal CFT frameworks in the country to ensure adequate protections for civic space and NPO operations.

The workshops brought together participants from various sectors, including civil society organizations, public administrators, lawyers, religious leaders, students, academics, project coordinators, journalists, and defense and security forces. Case studies and exercises were designed to provide concrete, real-life situations, thereby enabling participants to put into practice the knowledge acquired during the training sessions. A positive dynamic of interactivity, active listening, and a willingness to share created an environment conducive to collaborative learning while respecting the diversity of opinions and ensuring every voice was heard.



Participants in the training series on proportionate implementation of measures to protect nonprofit organizations from terrorism financing abuse in Côte d'Ivoire. Photo credit: Thinking Africa staff.

The program saw consistent participation throughout the training sessions, which allowed it to focus on building a depth of knowledge among a core group that previously had little exposure to terrorism financing concepts and CFT frameworks. Care was taken to harmonize content across sessions, ensuring complementarity and context specificity. Contributions from high-level officials, including representatives from the economic police and the FIU, further enriched the workshop with practical insights and real-world experiences. Following the training series, participants received training materials to reinforce learning outcomes and voluntarily joined a WhatsApp group to continue exchanges and collaboration.

GHANA — Institute for Democratic Governance

In Ghana, the Institute for Democratic Governance (IDEG) led a program to increase awareness of the impact of CFT measures on NPO operations and foster an enabling environment for NPOs to engage with regulatory authorities. The project reached 384 direct beneficiaries, including 255 males and 129 females from research, advocacy, faith-based, humanitarian, and service-oriented organizations; regulatory institutions; financial institutions; and the media. Indirectly, the project reached approximately 13,000 individuals through mainstream and social media publicity.

The program developed a baseline study titled “Impact of AML/CFT Measures on NPOs in Ghana,” drawing on quantitative and qualitative data from 165 individuals. The objectives of the study were to (1) assess the level of awareness of NPOs regarding AML/CFT policies, (2) identify FATF-related restrictive measures imposed on NPOs by the Ghanaian government, (3) examine the extent to which AML/CFT measures have impacted NPOs practically, and (4) identify ways through which NPOs can minimize the effect of burdensome or restrictive measures on themselves. A validation workshop was held with government and civil society to collect feedback on the study, which afforded an opportunity to exchange viewpoints on AML/CFT implementation goals and challenges.

A policy brief was developed based on the findings of the study, including recommendations to remedy the impact of CFT measures on civic space and NPO operations.¹⁶ The brief was used as the basis for a high-level policy dialogue with NPOs, the Financial Intelligence Centre, the Economic and Organized Crime Organization, the Ministry of National Security, and financial institutions. The dialogue was important in shaping the perspectives and actions of stakeholders and came at a key moment because Ghana was in the process of introducing new NPO legislation. At the end of the dialogue, stakeholders agreed that it was essential to align the timeline for the passage of the NPO bill to the timetable of Ghana’s next mutual evaluation in January 2025 to ensure measures appropriately respond to FATF standards without introducing overregulation.



High-level policy dialogue on the impact of countering the financing of terrorism measures on nonprofit organizations in Ghana. Photo credit: IDEG staff.

During the program, government officials indicated they had been prioritizing outreach and engagement efforts among NPOs that identified as higher risk in Ghana’s risk assessment. IDEG helped to augment and expand outreach efforts to a wider set of NPOs, co-hosting a training session with the regulatory authorities for 50 NPO representatives on the implementation of CFT measures for NPOs. A second session for 56 NPO representatives was held in collaboration with the FIU and NPO Secretariat for organizations operating in Ghana’s border regions. The trainings included a session on coalition building to safeguard civic space and prevent unintended consequences of CFT measures. Media reports on the program’s activities further amplified its interventions and reach, including coverage in newspapers, television, radio, and online platforms.

The project helped NPOs deepen collaboration and partnership with key governmental agencies. For example, FIU staff served as resource persons for program implementation and further facilitated working relations with other state actors that were initially not receptive to the project. NPOs that had challenges with the filing of their annual returns and acquisition of permits secured appointments with the director of the NPO Secretariat and had their issues resolved following discussions during the program activities. The end-of-project evaluation indicated positive feedback from stakeholders, with the Financial Intelligence Centre requesting IDEG to serve as a member of a working group for Ghana’s next terrorism financing risk assessment for the nonprofit sector.

¹⁶ Ibid.

GHANA — Institute for Security, Disaster and Emergency Studies

The Institute for Security, Disaster and Emergency Studies (ISDES) program focused on building the capacity of civil society actors with regard to measures to protect NPOs from terrorism financing abuse, including the potential for such measures to limit the civic space, access to financial services, and humanitarian action.

The program commenced with focus group discussions to assess the implementation of CFT measures and identify training needs. It included consultations with representatives of NPOs, banking, local government, security agencies, the NPO Secretariat, the Ministry of Social Welfare, and the Economic and Organized Crime Office. Consultation findings were used to develop a three-part certificate course on countering the financing of terrorism for NPOs, which was co-delivered to a cohort of 20 civil society actors by IDEG, the Financial Intelligence Centre, and the NPO Secretariat.

The beginner course provided broad awareness raising on key concepts, frameworks, and actors. This included the terrorism financing cycle, typologies relevant to West Africa, international CFT bodies and frameworks, and an overview of the AML/CFT legal regime in Ghana. The intermediate course equipped NPO participants with skills to manage potential terrorism financing risks, featuring an overview of FATF Recommendation 8 on NPOs, a review of obligations for NPOs under domestic laws, and discussion on good practices for risk mitigation. The advanced course further deepened risk mitigation capacities, focusing on understanding risk factors, adopting a risk-based approach, and building an effective culture of risk mitigation. ISDES distributed pre- and post-training questionnaires to assess participant learning and course satisfaction.



Subgrant implementing partners exchanging good practices on program implementation in Ghana. Photo credit: Global Center staff.

The program contributed to a peer-to-peer support system for NPOs, including establishment of a WhatsApp group for ongoing exchanges. Following the training, participants also received coaching on understanding their unique risk profiles, including support to develop organizational risk assessments as needed. The program's evaluation underscored the importance of NPO-led capacity development efforts, noting resource and capacity constraints within the NPO Secretariat. This is a common challenge because CFT regulators can lack adequate NPO expertise while NPO regulators may not have adequate knowledge and capacity on terrorism financing issues. Often, it falls to civil society actors to proactively lead engagement with governmental counterparts to ensure that the design and implementation of CFT measures are effective, proportionate to identified risks, and nondisruptive to NPO operations.

KENYA — Human Rights Agenda

The Human Rights Agenda (HURIA) aimed to increase awareness of CFT measures among civil society actors in coastal Kenya and create opportunities for civil society to engage with governmental actors on their proportionate implementation. The program benefited from collaboration among HURIA, the Non-Governmental Organizations Board (NGO Board), and the Kenyan National Counter-Terrorism Centre. Bilateral meetings at the start of the program laid the groundwork for this collaboration, igniting the willingness and commitment of governmental partners to engage in the project.

HURIA then convened a group of coastal civil society actors to meet with the NGO Board and discuss program objectives and priorities, as well as secure commitments for collaborative engagement on safeguarding civic space while preventing terrorism financing abuse of NPOs.

During the meeting, it became clear that NPO participants had mixed capacities on countering the financing of terrorism. Some were familiar with CFT measures due to contractual obligations from donors, while others were engaging with the topic for the first time. HURIA and the NGO Board jointly planned and delivered a training for 23 NPOs, focusing on international and domestic AML/CFT frameworks, the role of NPOs in CFT efforts, and the impact of countering the financing of terrorism on civic space. The training was successful in deepening participant capacities and spurring commitment on risk mitigation efforts. HURIA noted the need for further capacity development support, especially among grassroots organizations, and recommended anchoring future efforts in a civil society organization consortium body to sustain training outcomes and coordinate ongoing advocacy and engagement efforts with government.

HURIA also facilitated three multi-stakeholder roundtables on the implementation of CFT measures, in Mombasa, Kwale, and Kilifi with representatives from civil society, the NGO Board, the national counterterrorism center, and the Anti-Terrorism Police Unit. The discussion was colored by historic instances of abuse



Training for Kenyan nonprofit organizations on the role of nonprofit organizations in countering the financing of terrorism and the impact of those efforts on civic space. Photo credit: HURIA staff.

and misapplication, most notably the 2015 government-issued list of 85 entities suspected of association with al-Shabaab, including two from the Coast region, which was later dismissed in court.

The meeting afforded an opportunity for exchange between civil society and government on ensuring that CFT measures do not infringe on civic space. For example, participants sought to clarify the rationale and procedures for organizations engaged in efforts to prevent and counter violent extremism to seek accreditation from the national counterterrorism center.

The program also sought to map instances of misapplication and abuse of CFT measures in the Coast region and to document lessons learned in navigating these experiences. Resource constraints and a reluctance to share sensitive information hindered data collection. HURIA was able to generate a sample of 15 organizations to discuss their familiarity with CFT measures and their impact on civic space. A common impact highlighted was the delayed disbursement of funds, as well as increased screening of Islamic organizations and curtailment of funds originating from Persian Gulf countries considered to be higher risk for terrorism financing. The project notes a need for further research to examine the particular civil liberties and freedoms that are curtailed as a result of CFT regulations in the country and whether the regulations are applied uniformly to all NPOs or if some NPOs are more impacted than others.

MOZAMBIQUE — Grupo de Ajuda para o Desenvolvimento Comunitário

Grupo de Ajuda para o Desenvolvimento Comunitário (GADC, Community Development Help Group) led a program to expand awareness of CFT measures among civil society organizations outside of the Mozambique capital region and to prepare them to engage in constructive dialogue with government on the protection of civic space while countering the financing of terrorism.

GADC began by assessing the landscape related to countering the financing of terrorism and civic space through consultations and focus group discussions in the provinces of Cabo Delgado, Nampula, and Sofala. On-site engagements were challenged by road damage and the unstable security situation in the northern region. Ultimately, 48 organizations were contacted, and 18 agreed to participate. Of those that declined, some felt that CFT issues were irrelevant to their work while others expressed concerns about engaging on the politically sensitive topic.

The assessment found a lack of governmental outreach on terrorism financing issues with NPOs outside the capital. NPOs indicated they were aware of governmental policies to promote accountability, integrity, and public confidence in the sector but were not familiar with how these relate to efforts to mitigating terrorism financing risks. A training was held to improve NPO capacities on terrorism financing risks, the components of FATF Recommendation 8, and good practices for safeguarding civic space in its implementation. During the training, various tools for internal use were introduced and shared, such as self-risk assessment and the risk-based approach. The training included NPO representatives from the Southern (Maputo, Gaza, and Inhambane) and Central (Tete, Manica, and Sofala) regions.

A series of roundtables were held with NPOs to discuss collaboration and engagement strategies with government officials. The process resulted in the formation of a working group of NPOs for dialogue on CFT measures, with a further proposal to convene subforums to allow for region-specific interactions. GADC



Working group meeting on good practices for terrorism financing risk mitigation that do not disrupt civil society operations in Mozambique. Photo credit: GADC staff.

also facilitated informal advocacy meetings with NPOs, sector regulators, and the FIU. These meetings sought constructive dialogue on engaging NPOs, particularly those outside of the capital region, in CFT processes and implementation efforts. The informal structure created space to advocate for expanded civil society participation and to address obstacles to the formal functioning of the working group, such as securing mutual cooperation agreements with governmental agencies.

The first official working group meeting focused on two themes: effective engagement of NPOs in CFT measures and good practices for risk mitigation that do not disrupt NPO operations, in compliance with Recommendation 8. It also emphasized the need for awareness raising among NPOs on the rationale for CFT measures, capacity building for NPOs and regulators on terrorism financing risks, sensitization on the possible unintended consequences of countering the financing of terrorism on NPOs, and strategies to expand and sustain governmental engagement with NPOs outside the capital region. Following the meeting, a WhatsApp group and a Facebook page were created to facilitate ongoing communication and coordination among members.

TANZANIA — Global Peace Foundation

In Tanzania, the Global Peace Foundation (GPF) worked to foster a collaborative environment where NPOs and financial stakeholders can work to combat terrorism financing effectively. The program focused on creating a sustainable framework to mitigate potential terrorism financing abuse in the humanitarian sector while safeguarding civic space.

The GPF began with sensitization meetings to secure buy-in for program activities from key partners, including the Tanzanian National Counter Terrorism Center and the FIU, and gain insight on the current status of terrorism financing issues in Tanzania. A stakeholder briefing was held with 46 representatives from NPOs, governmental entities, communication companies, and financial institutions, co-chaired by the GPF and the national counterterrorism center. The briefing initiated discussion on challenges associated with countering the financing of terrorism, collected constructive feedback on project activities, and paved the way for further collaboration among the key stakeholders.

A comprehensive training curriculum for NPOs was developed to raise awareness of international standards and domestic legal and policy frameworks on countering the financing of terrorism, as well as to share knowledge about risk factors and mitigation strategies to protect humanitarian organizations from terrorism financing abuse. To refine the training curriculum further, a pilot session was conducted with representatives from the national counterterrorism center, FIU, and Global Peace Foundation International.

Two awareness-raising workshops were conducted for a total of 62 NPOs, providing a thorough understanding of terrorism financing concepts, relevant legal frameworks, and practical risk mitigation strategies for humanitarian actors. The workshops were interactive, fostering knowledge exchanges and idea sharing among participants. Feedback on the project underscored a significant need for training and awareness raising for NPOs,



Awareness raising for Tanzanian nonprofit organizations on terrorism financing risks and mitigation strategies. Photo credit: GPF staff.

especially among smaller organizations and those operating within the borderlands of Tanzania and Mozambique that may face elevated terrorism financing risks, given their proximity to terrorist entities and operations.

Participants from the workshops were invited to a stakeholder coordination meeting to review and refine best practices and risk mitigation strategies. This meeting was facilitated by representatives from the FIU and national counterterrorism center, who answered questions on FATF Recommendation 8 and participated in a constructive dialogue. All 32 participating NPOs reconvened to finalize a policy statement and commitment letter to integrate identified risk-mitigation strategies into their organizational policies and manuals. The FIU director-general's endorsement of the policy statements signified a major milestone, and these documents were circulated to additional NPOs as part of ongoing outreach and awareness-raising efforts. The GPF also developed a flyer that was shared across social media platforms to further promote the initiative among NPOs in Dar es Salaam.

TOGO — Centre de Documentation et de Formation sur les Droits de l'Homme

The Centre de Documentation et de Formation sur les Droits de l'Homme (CDFDH, Center for Documentation and Promotion of Human Rights) aimed to address the potential terrorism financing abuse of NPOs while ensuring the protection of civic space in Togo. The program's implementation coincided with instances of terrorist activity, which led the government to enact a state of emergency and other restrictive measures. The project involved an awareness-raising digital campaign, training workshops, development of good practices, and advocacy efforts with governmental institutions.

The project's initial assessment determined that NPOs lacked a comprehensive understanding of the legal framework related to AML/CFT measures in Togo, which heightened the risk of unintentional violations that could trigger a crackdown on civic space. The CDFDH developed a suite of print and digital-awareness raising materials. A booklet on Togo's AML/CFT laws was developed using easy-to-understand language and disseminated to NPOs across the country. Six posters were produced with 500 copies hung in the country's five regions and distributed through CDFDH social media. Five educational vignettes and four webcasts were also shared via social and traditional media, and the project team appeared on a "le débat de Nana Fm," a prime-time radio program in Lomé reaching more than 500,000 listeners.

The CDFDH led a training for civil society actors from across Togo that provided foundational knowledge on the risk of NPO abuse for terrorism financing and prepared participants to engage with governmental actors on the protection of civic space in CFT efforts. Some participants later conducted further awareness-raising activities in their respective regions, notably in Mango, Kara, and the Golfe 5 commune in Lomé. These efforts helped



Training for civil society on engaging with government on the protection of civic space in countering the financing of terrorism efforts in Togo. Photo credit: CDFDH staff.

establish a foundation for documenting and addressing any instances of civic space restrictions under AML/CFT laws.

NPOs who participated in the training utilized their learning to develop advocacy efforts with government. An assessment of the legal and operational challenges related to AML/CFT measures was developed, including a review of the legal framework, actions taken by the authorities, the operating conditions for NPOs, and availability of avenues of recourse to challenge CFT abuse and misapplications. The assessment included recommendations for national authorities, which were shared in bilateral meetings with the FIU, anticorruption agency, and Ministry of Human Rights.

A final exchange gathered civil society organizations and multiple state institutions to discuss civic space restrictions and the need for better collaboration. NPOs shared the recommendations in the assessment and highlighted the benefits of developing a state-civil society consultation framework to advance collaboration, efficiency, and transparency in CFT measures.

UGANDA — Defenders Protection Initiative

Defenders Protection Initiative (DPI) continued its work to broaden and deepen spaces for dialogue between NPOs and regulators and other governmental actors on the impact of CFT compliance obligations on civic space.

Created with input from the National NPO Working Group on FATF in Uganda, the DPI developed and distributed 500 copies of simplified knowledge and nongovernmental organization–tailored information, education, and communication materials. The materials focused on what NPOs need to know about FATF and domestic CFT measures to empower them to mitigate the impact of those measures on their operations. The DPI produced book inserts, posters, and coasters designed to promote continuous learning on the topic within the NPO sector, which reached more than 100 organizations in the country. Several organizations requested the materials be translated into local languages to further extend the reach and accessibility of the information.

The DPI, working in collaboration with Uganda's FIU, conducted a series of awareness-raising trainings outside of the capital, including in Mbarara City, Jinja City, and Gulu City. A total of 60 civil society actors participated in the trainings, which focused on the global, regional, subregional normative, and institutional frameworks for implementing AML/CFT regulations and their influence on national laws and policies. Presentations included a review of FATF Recommendation 8 and the findings of Uganda's National NPO Risk Assessment on Terrorism Financing. Also, they explored how NPOs can constructively engage with government on CFT matters. Evening “fireside” dialogues allowed participants to share experiences, knowledge, and concerns with the Financial Intelligence Authority (FIA) and each other in an informal setting. These dialogues helped foster collaboration, with the FIA expressing commitment to addressing the concerns of NPOs.

The first annual Talk to Your Regulator (T2R) Summit was organized by the DPI in collaboration with the Civic Advisory Hub under the theme “Cultivating Trust to Improve NGO Sector Governance.” The summit was the culmination of a series of in-person and virtual workshops held between civil society leaders and nonprofit regulatory authorities. In total, 156 people



Awareness-raising sessions for civil society on countering the financing of terrorism measures and strategies for engaging with government officials. Photo credit: DPI staff.

attended the summit with a further 359 participants joining virtually from Angola, Australia, Botswana, France, Kenya, Malawi, Mozambique, South Sudan, Tanzania, the United States, Zambia, and Zimbabwe. The summit highlighted a crucial aspect of mistrust and suspicion between regulators and NPOs, helped to bridge the knowledge gap on NPO regulations and challenges to NPO compliance, and worked to foster collaboration on mitigating the unintended consequences of CFT and other legal frameworks on civil society in Uganda. WhatsApp groups were established to continue information sharing on successes and challenges and to provide support to civil society on compliance and risk mitigation measures.

The program also helped connect NPOs with the National NPO Working Group on FATF, building collective power for pushback against unintended consequences that affect the civic space. In its program evaluation, the DPI underscored the value of expanding membership of the working group and considered whether the formation of specialized subgroups, including finance experts, lawyers, and media representatives, would enhance the effectiveness of its ongoing efforts. The DPI stressed that an informed, robust coalition is important to realizing a holistic approach to defending the targets of the CFT abuses, particularly in the lead-up to Uganda's 2026 elections.

CONCLUSION

The GCTF good practices memorandum captured global expertise on strategies to implement CFT measures while safeguarding civic space. In supporting its implementation, this initiative further affirmed the importance of locally led efforts to promote and protect human rights and the rule of law in the context of CFT measures. Through the experiences of 10 civil

society organizations, this report has captured several factors of success alongside a set of constraints and roadblocks. It finds that civil society fundamentally must have the capacity, space, and support to engage credibly and meaningfully with government on the design, implementation, and evaluation of CFT measures to ensure they do not disrupt or discourage NPO operations.





Global Center on Cooperative Security

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