



This Policy Brief is based on the speeches given and discussion held during the Panel Discussion “Counterterrorism Measures and Their Effects on the Implementation of the Women, Peace & Security Agenda”, organized by the Women Peacemakers Program (WPP), the Human Security Collective (HSC), WinG India and the Ecumenical Women’s Initiative (EWI). The panel discussion took place on March 12, 2015, and was hosted by the Permanent Mission of the Kingdom of the Netherlands to the UN in New York. The Policy Brief also draws upon research done by WPP, HSC, EWI and WinG India.

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## Policy Brief

# Counterterrorism Measures and Their Effects on the Implementation of the Women, Peace and Security Agenda

*In Resolution 2122 (2013), adopted on 18 October 2013, the UN Security Council reiterated its intention to convene a High-level Review in 2015 to assess progress at the global, regional and national levels in implementing UN Security Council Resolution (UNSCR) 1325 (2000), renew commitments, and address obstacles and constraints that have emerged in its implementation. In preparation for this High-level Review, UNSCR 2122 also invited the Secretary-General to commission a Global Study on the implementation of UNSCR 1325, highlighting good practices, implementation gaps and challenges, as well as emerging trends and priorities for action for the Women, Peace & Security (WPS) agenda. The results of the Study will be submitted by the Secretary-General, within his annual report to the Security Council in 2015.*

*A worrying emerging trend affecting women’s organizations worldwide - which has the potential to become a serious disabler to women’s human rights and peace activism and hence UNSCR 1325 implementation in upcoming years - is the impact of counterterrorism measures (CTM). In light of the Global Study and High-level Review process, it is critical to shed light on the CTM-related structural obstacles that women’s organizations and activists are increasingly facing on the ground, in order to develop appropriate responses that can ensure that women’s transformative work for peace and gender justice around the world can actually continue to be supported in the future.*

## Introduction: CTM and the Financial Action Task Force (FATF)

Established in 1989 by the G7, the Financial Action Task Force (FATF) is one of the most influential but least known multinational organizations. Operating as a working group, the FATF is not underpinned by a convention or treaty. This provides the FATF with the freedom and flexibility to operate without much public scrutiny. Its mandate is to prevent anti-money laundering and terrorism financing, by setting a global standard.

One particular recommendation of the global FATF standard - Recommendation 8 - assumes that nonprofits are particularly vulnerable to abuse by terrorists for financing of terrorist activities. Other recommendations concern the private sector, the financial services industry, the banks and politically exposed persons. All these sectors need to be prevented from abuse by criminals and terrorists through the application of the FATF global standard<sup>1</sup>.

<sup>1</sup> Information on the impact of the FATF standard on civil society can be found at [www.fatfplatform.org](http://www.fatfplatform.org)

The global standard and its 40 recommendations were developed by a core group of 34 country members and two regional organizations<sup>2</sup>, which were then transposed into national laws, rules and regulations to prevent money laundering and terrorism financing. To date, over 180 countries have endorsed the standard and as such, and are subject to a peer evaluation by the FATF every 6 to 7 years. Countries receive different ratings according to their compliance with the standard. Receiving a low mark immediately influences a country's international financial standing.

Unfortunately, a good rating by the FATF does not imply that the country has a good human rights track record or good/inclusive governance. For example, during the third round of FATF evaluations in 2011, Tunisia and Egypt (previous to the Arab Revolutions) received full marks on their compliance with the standard, including R8. Countries like Norway however, received a partially compliant as they did not have the type of (restrictive) NPO legislation and oversight the FATF deems important in relation to Recommendation 8.

Evaluators are staff of FATF or of one of their 7 regional bodies, including the World Bank and IMF. Very few evaluators are familiar with the civil society sector, and hence are operating on the notion that civil society is vulnerable and therefore at risk of becoming abused by terrorists. Specific civil society strengths, e.g. the ability to network across borders (enabling the linking of local voices to international agendas and vice versa to advance a human rights, peace and human security agenda) are labeled as risks requiring mitigation by the FATF. In short: those features and capacities that make civil society actors strong human rights and peace advocates, in the eyes of the FATF also make them an easy prey for violent extremists.

A number of countries have started to use the FATF standard, and specifically Recommendation 8, as a pretext to clamp down on civil society space. Although countries often deny that it is the FATF standard that forces them to design and enact laws and regulations that go against civil liberties and civil society freedoms, evidence is growing that upcoming FATF evaluations have a preemptive effect on civil society space<sup>3</sup>. This is a direct result of governments' desire to show the FATF that they are capable to prevent terrorist financing abuse through their charity and NPO sector. In addition, some countries are now starting to pass more restrictive NPO laws *after* an FATF evaluation - as if the evaluation was needed to legitimize the drafting of such laws.

With the FATF being concerned about international illicit financial flows, their standard also had a great impact on the financial service industry, in particular banks. There is a growing body of evidence that shows that banks' risk averse behavior - due to fear of sanctions when not abiding by the FATF standard, which may include the withdrawal of their banking license, freezing of assets, hefty fines - has resulted in the withdrawal of bank services to civil society active in conflict areas - in particular Syria, Iraq, and Somalia. As a result of the "better safe than sorry" mentality of the banks, a growing number of civil society organizations are experiencing great difficulties to make money transfers to their partners. In the short term, organizations often try to find other - riskier - solutions to get the money where it is needed (carrying money by hand to conflict areas, using underground banking, etc.). However, this is not sustainable, due to increased personal risks attached to such measures, as well as these failing to meet the accountability and transparency requirements of back donors.

It is important to note here that it is not only the FATF that plays an important role in the risk management of banks, but also US entities like the Office of Foreign Asset Control of the US Treasury. It is the extraterritorial authority of the US government to issue sanctions that is very powerful and fuelling the banks' risk aversion<sup>4</sup>.

<sup>2</sup> Mostly Western and other powerful countries in the area of international financial flows, e.g. China and Russia. The two regional organizations are the EU and the Gulf Cooperation Council.

<sup>3</sup> See also papers submitted to the conference on "Regulation or Repression: Government Policing of Cross-border Charity", at the National Center on Philanthropy and the Law of the NYU, in 2014 (in press).

<sup>4</sup> The US Treasury is very influential in setting and driving the FATF agenda. See "Uncharitable behavior: counter terrorist regulations restricts charitable banking worldwide", a 2014 report by Tom Keatinge for Demos. [http://fatfplatform.org/wp-content/uploads/2015/02/DEMOS\\_UncharitableBehaviour\\_report.pdf](http://fatfplatform.org/wp-content/uploads/2015/02/DEMOS_UncharitableBehaviour_report.pdf)

## Concerned Voices from the Field: CTM & Shrinking Space to Implement UNSCR 1325

Last year, the UN appointed Special Rapporteur on the Rights to Freedom of Peaceful Assembly and of Association published three general principles to protect civil space, the first of which stated that *“being able to seek, receive and use resources is inherent to the right to freedom of association and essential to the existence and effective operations of any association”*. However, CTM is increasingly shrinking the enabling space women activists so desperately need to do their challenging work for peace and gender justice.

Early 2015, the Women Peacemakers Program (WPP) and the Human Security Collective (HSC) contacted a selection of partners, to gain insight into the multiple ways the CTM agenda is affecting their work for peace and women’s rights. The questions inquired about the type of work their organization engages in; experiences in terms of changing banking requirements/ national NGO legislation/ donor requirements; direct impact of these changes on their work; and efforts undertaken to address the negative consequences. All respondents were provided with a guarantee that their feedback would be handled confidentially. This proved important, as many organizations are hesitant to disclose their experiences, fearing loss of reputation as well as other - more severe - repercussions.



Input was received from a selection of civil society organizations and networks active across the world (approximately 10 countries, including from Asia, MENA, Africa, Europe, and North America). Respondents are working on a broad range of issues linked to the WPS agenda, including:

- empowering young women and men for peace;
- engaging in nonviolent mobilizing for peace;
- countering militarism;
- investing in a resilient and empowered civil society to advocate for accountable and responsive governments;
- engaging with indigenous and marginalized communities to promoting women’s rights and leadership in local governance and peacebuilding;
- supporting IDP women, in particular on issues related to (S)GBV, by providing psychosocial and legal support as well as economic empowerment;
- implementation of the WPS agenda on a local/national/ international level (including the development and monitoring of 1325 NAPs);
- providing capacity building for governmental institutions on (S)GBV and SGBV
- advocating for women’s rights through political and economic empowerment in post-war contexts;
- providing funds to women’s initiatives for peace and gender equality.

From the responses, it became clear that CTM has a gendered impact - affecting women activists and organizations working for the implementation of the Women, Peace and Security agenda in particular ways.

**First**, because these activists often work in high-risk settings, where they face **repercussions because of the political nature** of their work - women's rights and peace activism - as it challenges established notions and bastions of (patriarchal) power. Several respondents mentioned how their governments are trying to control, limit, or stop their work, through the development and passing of new NGO legislation. Some respondents mentioned that their government was engaging in nation-wide campaigns of invasive NGO inspections, using harassment tactics such as personal intimidation and threatening activists with the closing down of their organizations. The activists indicated this legislation (has the potential to) severely limit(s), silence(s), and even block(s) their critical advocacy and activism, for example by placing limits on association with foreign donors.

*"The existing legislation does not hinder our work at the moment, but there are a few suggested bills that will restrict our donations. The main risk for us lies in the proposed NGO bill... However, thanks to internal and external criticism, thus far we have been successful in freezing this bill."* Organization based in the MENA region

*"So far, we have not yet experienced problems receiving (foreign) funding for our work. However, there are provisions in the NGO Regulation that may lead to such prohibitions, especially if the money is meant to fund human rights and advocacy. The definition of "NGO work" in the Regulation and Act refers only to service delivery that relates to the provision and construction of health centers, schools, or any other form of infrastructure. This narrow definition could easily be used as a curtail on NGO work - but it has not yet been applied to any organization."* Organization based in the Great Lakes region

*"When I received a grant from one (domestic) Foundation, I was getting calls from the intelligence bureau and had to supply them with three-years of audited statements, a list of Governing Board Members and staff members. [...] They visited my home three times, to ask me questions."* Organization based in South Asia

*"The Rights and Liberties Committee at the Constitution Drafting Assembly has released their suggestion for the Constitution, which includes a section on civil society, namely that local civil society should be banned from receiving any foreign government funds."* Organization based in the MENA region

*"Every organization receiving foreign contributions has to apply for mandatory license or permission from the government. Often granting of the license or its refusal is a mere discretionary administrative exercise, and arbitrary. Granting a license can be refused on the basis of "public interest". What constitutes public interest is nowhere elaborated. One of our partner organizations that applied for the license was denied the certificate, on the basis of "public interest", and their bank account to receive foreign donations was closed by the bank abruptly. Some of our partner organizations that have obtained the certificate only received the funds deposited in their bank accounts after two years of waiting... Also, the regulations are amended from time to time. Soon, all the organizations with a license have to undergo a compulsorily review and it will be at the discretion of the government to withhold or close their certification. In some locations, all civil society organizations have to submit a copy of their annual report to the police, armed forces, and intelligence offices of the state. Demands of transparency are also coming from the banks...It has been quite some years now - a decade maybe - as it is becoming more and more rigorous. Personally, I know of several organizations that were well grounded in rights-based work and creating alternatives, which are closed now, or forced to close due to these changes."* Organization based in South Asia

*"As an organization working in Gaza (with staff there) we are not allowed to pay taxes for these employees, since this would clash with US anti-terror legislation."* Organization based in North America



**Secondly**, as women's rights and peace organizations are relatively small organizations with limited budgets, they do not have the leverage to negotiate a solution with their banks, which big donor organizations and charities are often still able to achieve. As such, they easily fall prey to the "better safe than sorry" behavior of the banks. Several partners mentioned facing **challenges with their banks**, ranging from delays in receiving their funds; to banks requesting additional project information before releasing their funds; to banks no longer releasing foreign funds; to banks refusing to provide bank accounts to women's organizations, and banks even closing their accounts.

*"We regularly face delays in receiving our funds, due to demands from the banks. In the past two years, there have been several demands from our bank to receive the grant proposal under which funds were transferred from foreign donors. In all these cases, we have refused to provide them with this information. We have asked the bank to provide us with the reason for this demand in writing, and in the end the bank has always released the funds without receiving the documents. This is also happening to other left wing NGO's in our country."*  
Organization based in the MENA region

*"The receipt of funds has always faced some delays since the passing of the Anti-Money Laundering Act in 2013. The banks require an agreement detailing the reason of receipt of the funds and for what purpose. They usually request to have a copy of the agreement on file. This causes delays."* Organization based in the Great Lakes region

*"We have had problems receiving our funds. For example, when one colleague had to get a travel reimbursement from an organization in the UK, it took almost a year to reach us. It also took very long to receive a small grant for local trainings from a partner organization in the Netherlands. The final part of the installment never reached us - it disappeared in the banking system."* Organization based in South Asia

*"Sometimes we are facing difficulties during the money transfer process, it takes a long time for us to receive the funds, and some correspondent banks reject the amount. Recently a new system has been introduced: there is a limit on the amount we can withdraw on a weekly basis from the bank. This means we cannot pay all our organizational expenses on time, such as staff salary, rent, activity expenses... Everyone is calling us for their money, and we have to promise them that we will pay them next week ... Sometimes we are taking loans from other people just to cover our expenses. The banks should have a special system dealing with NGOs, especially when they also provide humanitarian services."*  
Organization based in the MENA region

*"All the banks have been instructed to notify the government of certain donors before remitting the amount to the organization's bank account. Failure of doing so on behalf of the bank will attract legal action from the government. Members of our network, who work individually as researchers, were put under heavy surveillance, which actually is not applicable to individuals earning income through consultancy... Banks refused to deposit the consultancy fees into the bank account of the consultant working with certain foreign donors."* Organization based in the South Asia region

*"We regularly experience that funds transferred to our partners in the field do not arrive to their bank accounts, or arrive very late. We have had several conversations with our bank about this - it looks like the funds regularly get stuck somewhere in the middle, due to intermediary banks delaying or refusing the transfer flow."* Organization based in Europe

*"There have been occasions when our grantees have asked us for additional documentation relating the internal partnership agreement between us and the grantee, before they can access their grant from their account. This has only begun happening in the last 18 months."*  
Organization based in Europe

*“Upon receiving a grant from our government to implement a multi-year program to support women peace builders in the MENA region, we decided to open a second bank account, as we were spending too much of our staff time (we are a small team) to track “delayed funds” with our current bank, as well as explain the delays to our partners in the field. We hoped that transfers would be faster with this new bank. However, this bank refused to provide us with a bank account. When our treasurer explained to them what our work is about - that we are organizing trainings and meetings with women rights and peace activists from the MENA region - they concluded that this was too risky for them. Basically, they were concerned about money ending up with a Syrian organization. This is particularly striking, since our government is releasing funds to us so we can address the difficult and deteriorating situation of women human rights defenders and peace activists in the MENA region, yet our national banks are apparently able to “block” this support”* Organization based in Europe

**Thirdly**, donors’ focus on transparency increasingly results in demanding requests towards grantees to maintain and disclose detailed project records, including for online publication by the donor. The latter can put women’s organizations in a difficult position, as they struggle to resolve how to balance these **transparency requirements** with the need to guarantee the safety and security of themselves and their beneficiaries, with whom they are often working on sensitive topics in high-risk settings.

*“Two years ago, the contract with our donor suddenly mentioned an extra provision, namely that all the project documentation and reporting we provided them with would be made available online, in the framework of complying with IATI standards. We explained to them that though we consider it important to provide them with detailed project information as our donor; we also faced the obligation of ensuring the safety of our partners, which would be at stake if all this information would automatically be made public. We therefore pushed for an addendum in the contract, stipulating that any information provided by us to them needed prior approval from our side before being put online.”* Organization based in Europe

Women’s organizations also mentioned how they struggle with the **growing administrative burden** placed upon them by donors, as these increasingly complex and time-consuming requirements are clashing with their organizational reality: Many women’s organizations are operating on very modest budgets with (a combination of) limited paid staff capacity and/or volunteer efforts, in a demanding environment that is at best challenging and at worst highly insecure and hostile.

In addition, direct access to funding is getting more difficult for women’s organizations. This is due to donors’ growing preference to channel funds via large organizations (including consultancies), which are capable of producing (multiple) grant proposals according to donors’ demanding guidelines, as well as can absorb their rigorous reporting and auditing requirements. The complete **gender-blindness of many donors’** funding criteria is manifested in the fact that these often fail to take into account the organizational capacity of women’s rights organizations to apply for complex grants, let alone process large amounts of funding. All this is increasingly undermining women’s organizations’ and movements’ direct access to funds. As such, the feminist principle of “access and control” is at risk, and with this, the existence of the “movers and shakers” that have put - and are keeping - the issue of gender/ women’s rights/ UNSCR 1325 on the global policy agenda.

*“Some of our donors have in the past couple of years increased their monitoring and grant installment regulations, now asking us to conduct two yearly audits (instead of one).”*  
Organization based in the MENA region

*“While government has threatened to audit NGOs, the donors have become extremely stringent on compliance issues, especially [US-based donor] and now closely followed by [EU-based donors]. Any transfer of funds to any other bank account or implementing partner that is not legally recognized will be considered fraud. The requirement for documentation of processes is extremely high, thus creating an administrative burden, especially where the financial reports must be submitted on monthly basis to the donors. In the same spirit, the financial releases are supposed to be done on monthly basis upon submission of a satisfactory report. This is also accompanied by the presence of an investigative field monitor that aims at ensuring that all the figures on number of activities, venue, participants and actual expenditures are correct. Any variance is considered fraud that may lead to being debarred. Handling of cash is also restricted. So in order to receive any money from the donors, you should have undergone an organizational assessment that verifies financial, administrative and program systems as well as physical address before any funding is disbursed or approved as a grantee. As a result, the high risk organizations have lost funding.” Organization based in the Great Lakes region*

*“Bigger NGOs are becoming the channel through which smaller organizations might get some support in some cases, but it depends on the projects and also on the donors...There is enough funding for service delivery organizations and those who follow right wing politicians. However, there is no funding for the rights-based organizations, or for those that work towards alternatives. And women’s peace activism in particular faces great challenges.” Organization based in South Asia*

*“There are most definitely increased procedures regarding monitoring the flow of funds to our grantees, which does put pressure on our human resources. These procedures are the result of donor requirements, when the grant to us has been from their government ministries. We have significantly increased pressures on our human resources regarding donor reporting as a women’s fund. Frequently we find ourselves working overtime to meet the requirements of this related additional bureaucracy, and in cases have had to seek external advice.” Organization based in Europe*

As such, CTM - whether subtly or bluntly - is having its impact on an enabling space for women’s civil society organizations working for peace and women’s rights, worldwide. As one partner mentioned:

*“Our organization has been affected in several ways by this. We face an increase in expenditure (because we want to avoid targeting, we now travel in groups, which is more costly); increased surveillance of our movement and programs (officials are asking for reports and bank advices, including that of our personal bank accounts); postponing or cancelling of some of our programs or keeping low profile for some time; mental unrest of our members; impact on the reputation of our organization as our work was projected as “anti-national”, which has affected the outreach of our member organizations. Also, a few partner organizations have left the network fearing repercussions by the government.”*

Partners made mention of the different strategies they are using to continue their work, yet also indicated that in the long-term these measures would not suffice to reverse the trend of shrinking space for women’s peace and gender activism. Measures they use include:

- Wording projects in a different way to avoid confrontation and repercussions;
- Keeping a low profile in regards to certain activities, or dropping of some programs;
- Taking loans to fill funding gaps due to bank delays;
- Using “risky” money transfer methods - e.g. carrying cash, Western Union transfers, transferring funds to private bank accounts;
- Trying to find a big organization with similar values and focus of work, willing to take them along in a funding application;
- Mobilizing public support (including international) to build pressure against the passing of restrictive NGO legislation.

## The Experience of Women's Funds

Women's funds of various sizes play a distinctive & high impact role in the funding landscape, dedicating their resources to projects and issues often under the radar and even ignored by mainstream donors. During 2014, women's funds within the 42-strong membership of the *International Network of Women's Funds* made direct grants to the amount of 35 million dollars. These millions have been invested in women, based on the principle that real change and empowerment begins on the ground, when communities identify their own problems and their own solutions rather than trying to meet somebody else's agenda.



Women's funds are facing a worrying paradox: never before has the validation of CSOs' roles as democracy's watchdogs been as strong, yet at the same time restrictions towards CSOs are growing in civic spaces.

The freedom to seek, receive and use resources is increasingly under threat because of CTM, with these threats coming in all shapes and sizes. For example, they take the form of additional requests and demands on how grantmaking is monitored; ever increasing bureaucracy in banking and donor reporting; and more

rigorous reporting formats issued by domestic governments under the auspices of increased transparency. Though many women's funds are able to receive funds themselves, they are experiencing new hurdles in transferring funds to women activists and organizations. These hurdles have begun appearing in the last 2-3 years.

### Examples Shared from Women's Funds

In **Bahrain** the Ministry of Interior needed to know the purpose of grants before local women's groups could receive them. Funds were eventually released, however starting in 2014, funds are no longer released to grantees in Bahrain. In **Argentina** foreign funds are heavily taxed with many women's groups using fiscal sponsors to evade that. One women's fund uses a notarized contract with specific language to release funds to grantees. In **Egypt** NGO registration is very difficult and foreign funds sent to NGOs are scrutinized by the government; groups register as limited liability companies and with them service contracts are signed in order to transfer funds. In **Venezuela** the government controls the inflow of foreign money, which means funds to women's groups have not been granted for three years now. In **Russia, Ukraine, and Azerbaijan** banks require written contracts to release funds and have unspecified contract format requirements. In **Bangladesh** the government requires a statement of the intended purpose of funds that includes the duration, project description and geographic scope. In **India** the NGO registering body takes a long time to issue and approve registration so some women's funds default to using fiscal sponsorship for unregistered groups.

In Europe - where it may be thought there are fewer hurdles to jump - there are other restrictions in force. Women's funds have noted new terms and conditions relating to the transfer of funds to some countries such as **Montenegro, Bosnia & Herzegovina, Serbia, Albania and Turkey**. These terms and conditions relate to anti-money laundering measures and to combat the financing of terrorism. As a result, women's funds need to provide the bank with a contract agreement and project document when ordering the transfer, information that in the past has not been requested.



## Examples Shared from Women's Funds

New and tighter laws governing foundations in **Spain** meant re-registration processes for a women's fund and the renewal of all documentation and bank permits. Two years ago, when the **Ukrainian** government introduced changes in the legislation - which demanded 15% tax on all amounts sent abroad as charitable donations or grants - considerable financial pressures were added on Ukrainian women's funds working regionally. It created difficulties with sending funds to women's groups in **Moldova and Belarus**, limiting also the amount of support that could be given. In the case of **Belarus**, even if money is transferred there, additional problems revolve around the fact that many CSOs cannot even have a bank account because of problems with registration. Moreover, problems continue even after succeeding to register and open an account, as they then need to prove the conformity of the grant with the law and their right to receive this grant. This requires them to present respective governmental agencies with much more documentation than they would ever have present to a donor. As a consequence of all this, many potential grantees in Belarus have to refuse grants, because they are not able to prove compliance with laws - and therefore their right to receive the funding. For this reason grants to women's organizations in Belarus are becoming increasingly rare.

One European-based regional women's fund, which is very active in terms of supporting women in the MENA region, is no longer able to transfer funds to women's organization in countries like **Algeria, Egypt and Syria**. Grantees in these countries cannot receive money in their bank accounts for reasons of counter-terrorism security laws. To continue supporting the women human rights defenders who are putting their lives on the line in these countries, demanding and risky solutions have to be used - including transferring funds from hand to hand, through private bank accounts, through friends, and so on.

Increased procedures regarding the monitoring of the flow of funds to grantees is putting pressure on women's funds' human resources. They result in a growing administrative burden, made up of increased correspondence with grantees, fiscal sponsors and banks; sending payments in multiple ways; duplication of contracts; fees for returned transfers; mailing of additional hardcopy contracts; delay in payments; decreased grant periods; maintenance of records in databases over extended periods; increase in number of payments by breaking grants up into installments, which also means increased paper work and bank charges.

It is important to note that women's funds on the whole commit to ensuring that a minimum of 55-60% of their annual budgets are dispersed as direct grants, which also entails a commitment to keeping overheads low. However, ensuring a close and supportive relationship with grantees - which forms an integral part of the work of women's funds - is becoming increasingly difficult with the additional administrative demands. Women's funds' response thus far has mostly been to absorb extra costs; spend more time in communication; and for those larger women's funds to allocate additional staff time to deal with these issues; provide extended grant periods with reporting extensions when possible and making a commitment above all to keeping grantee information confidential. However, the extra demands are eating into the precious time women's funds wish to spend accompanying their grantees, as well as their creativity in fundraising and in making the case of societal change as a result of women investing in women.



## Recommendations:

**Engage in further research** to document and monitor the scope of impact of CTM regulations on women's organizations and movements working for peace and gender justice worldwide.

**Invest in awareness-raising on CTM's gendered impact**, amongst policy makers, the banking sector, as well as civil society organizations, in order to increase understanding on how CTM can end up becoming an effective tool to silence and criminalize women's critical civil society work for peace and gender equality, thereby undermining universal human rights standards (incl. right of association), and ultimately the building of peaceful and democratic societies. Awareness raising is also required to break the spiral of silence many women activists and organizations find themselves in.

Women's civil society should become **involved in the methodology of the FATF evaluations and the training of FATF evaluators**, so they are able to appreciate the role and position of women's civil society in a given country. Civil society documents and input to FATF guidance papers should be obligatory input for evaluators. Evaluators should be able to rate a country for overregulation of civil society.

To **address policy inconsistency**, governments that are members of FATF and concerned about shrinking (women's) civil society space should make AML/CFT standard into a foreign policy issue. MoFA representatives should be part of the FATF delegation that currently comprises of Treasury, FIU, Justice and Security and Home Affairs delegates. In addition, national civil society networks should collectively engage allies in these different ministries to address the negative effects of the FATF standard on (women's) civil society's operating space.

**Engage in (inter)national lobby and advocacy** for changes in restrictive NGO legislation, making the case that governments' restrictive policies are resulting in the oppression of (women's) civil society and can result in an increase of anti-government sentiment among the public;

**Invest in networking and movement building** to build a critical mass of civil society activists to systematically monitor the shrinking space of (women's) civil society and develop joint strategies to reverse these trends. For example, women's organizations and activists can **join platforms** working to address CTM's impact on civil society, such as the International Coalition (with Charity and Security Network) or the European coalition (with ECNL and EFC), which will have a website with interactive applications online by the end of March 2015: [www.fatfplatform.org](http://www.fatfplatform.org). In recent years, these coalitions have started to engage with the FATF through continual dialogue, which includes giving timely and critical input on FATF's guidance documents for governments and lobbying national FATF members.

**Engage with the public** to educate on counterterrorist measures that are too broad and can stifle a vibrant civil society, creating unnecessary fiscal costs for the state and taxpayers as well as a society without sufficient watchdog power.

**Engage with the banking sector** to educate on the effect of their CTM policies on women's empowerment and rights, and hence contradict corporate social responsibility (CSR) commitments. Address the culture of banks whereby women's and other civil society organizations are easily turned down because they are not considered a profitable client but do require quite a lot of due diligence by banks for terrorist financing screening.

**Engage with donors** to raise awareness on the need to engender their grant requirements and procedures, so that women's movements and organizations working for peace and gender equality can have direct access to funding to do their important work on the ground.