



Financial Intelligence Centre

NATIONAL RISK ASSESSMENT ON: NON-PROFIT ORGANISATIONS (NPOs)

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1. Introduction

Namibia completed the first ever National Risk Assessment (NRA) aimed at assessing Money Laundering (ML) and Terrorist Financing (TF) risks in 2012. In line with the revised Financial Action Task Force (FATF) recommendations¹, the 2014/15 NRA update and scope expansion resulted in the review of national Proliferation Financing (PF) risks, Trade Based Money Laundering (TBML) and TF risks within the NPO sector. This report expands more on TF risks within the NPO sector as per FATF Recommendation 8.

Recommendation 8 requires that Countries review the adequacy of laws and regulations that relate to entities that can be abused for the financing of terrorism. Non-profit organisations are particularly vulnerable, and countries should ensure that they cannot be misused: (a) by terrorist organisations posing as legitimate entities; (b) to exploit legitimate entities as conduits for terrorist financing, including for the purpose of escaping asset-freezing measures; and (c) to conceal or obscure the clandestine diversion of funds intended for legitimate purposes to terrorist organisations. Although the focus at international level is primarily on TF and PF, the FIC considered the prevalence of ML risks (including predicate offences such as fraud and tax evasion) within the sector at a local level.

In understanding and appreciating risks within the NPO sector nationally, the FIC conducted a sectoral vulnerability assessment (SVA) into the sector. Results of such assessment are documented herein.

2. Scope and Objectives

2.1 The **objectives** of the SVA: understand the ML/TF&PF risks, inform the efficient allocation of resources, design and implement measures to effectively mitigate those

¹ FATF, International Standards on Combating Money Laundering and The Financing of Terrorism and Proliferation, The FATF Recommendations, February 2012.

risks. This assessment aims to identify the methods used to exploit vulnerabilities in the NPO system, highlight indicators and provide guidance to the NPO sector, regulators, law enforcement agencies and other stakeholders on how to effectively mitigate relevant risks identified.

2.2 The NPO Vulnerability Assessment scope consisted primarily of the need to:

- a) Determine which NPOs in Namibia fall within the scope of the FATF definition of a *non-profit organisation*² and to which NPOs Namibia's TF mitigation measures should apply;
- b) Better understand the domestic NPO sector, including size, type, locations and activities of NPOs;
- c) Understand the terrorist financing risks facing the Namibian NPO sector, and determine which laws, regulations, and other measures are already in place which might help to mitigate those risks, in line with Recommendation 8;
- d) Take the results of the domestic review into account in the context of the national risk assessment, as appropriate;
- e) Ascertain whether current laws, regulations, and other measures already in place are commensurate with the risks identified, in line with FATF Recommendation 8, and whether additional measures are needed to mitigate the risk.
- f) Identify and assess the potential for funds flowing to and from Namibia destined for persons associated with NPOs or NPO designated entities as involved in terrorist or proliferation activities or as supporting or being affiliated to terrorist organisations or designated on any UN Security Council Sanction lists (TF & PF threat); and
- g) Review the NPO sector for vulnerability to TF.

² **FATF definition of a non-profit organisation:** A legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of "good works".

3. Executive Summary

As at the end of 2017 Namibians could choose to register their Non-Profit Organisations under various bodies. For setting up Residential Child Care Facilities (RCCF), such would fall under the Ministry of Gender Equality and Child Welfare. Welfare Organisation (WO), are registered under the Ministry of Health and Social Services. Non-Profit Companies (Section 21 Company), Non-Profit Trusts are administered under the Master of High Court. Voluntary Associations (VA) on the other hand do not fall under any line ministry or authority.

According to the Business Intellectual Property (BIPA), there were 1,456 Section 21 companies registered. The Ministry of Gender, on the other side has registered 22 Residential Children and Safety homes and 464 Welfare Organisations. These organisations vary from churches and church centres, children's homes and safety homes, culture and recreation establishments, those involved in law and advocacy, political and cultural causes, as well as medical and educational causes.

Some of the organisations are regulated by the above-mentioned bodies/line ministries while some are non-regulated. The regulations/standards differ from one regulating body to the other. The majority of the charity organizations receive donations from local and international sources. About 50% gets funding from donors, especially the RCCF, Section 21 and Welfare Organizations. Owing to NPOs receiving significant funds from international stakeholders (cross border funds remittances), NPOs are inherently vulnerable to advancing TF or being abused for ML purposes.

This assessment found that NPOs that are prone or highly vulnerable to TF risks are those that are involved in cross border remittances of funds, especially when such remittances are linked to high risk countries. After analysis of such cross border remittance transactions, it was concluded that religious bodies, residential child care facilities and various welfare organisations present higher vulnerability levels, whilst those

involved in cultural, recreation, law, advocacy and political causes, amongst others, have lower vulnerability levels.

4. Overview of the NPO Sector in Namibia

The FIC assessed the adequacy of laws and regulations, systems, processes and activities that are designed to regulate NPO's in Namibia. Under the current legal and regulatory framework, prospective NPOs have the option to be registered and operate as any one of the following types of NPOs.

4.1 Analysis of the different types and number of entities in Namibia as at 31 August 2016.

Activities/ Objective	Number	Legal framework	Type	Regulator
Churches and Church centres	628	Companies Act	Section 21 Companies	Registrar of companies
Culture and recreation Radio, Entertainment and other recreational type	23	Companies Act	Section 21 Companies	Registrar of companies
Law, advocacy and politics	19	Companies Act	Section 21 Companies	Registrar of companies
Various (Cultural causes, Medical causes, Educational causes etc.)	786	Companies Act	Section 21 Companies	Registrar of companies
Residential Child Facilities	22	Minimum Standards for	Residential Child Facilities	Ministry of Gender

		Residential Child care Facilities		Equality and Child Welfare
Various Welfare Organisations	464	Various causes (Children homes, Social welfare e.tc.)	Welfare Organisation	Ministry of Health
Voluntary Association		None	Voluntary Association	None
Total	1,942			

4.2 Overview of the legal framework of the NPO Sector in Namibia

The study assessed the adequacy of the current legal and regulatory framework in as far as adequacy to combat ML/TF/PF, in the NPO sector, is concerned.

4.2.1 Under the RCCF’s Minimum Standards for Residential Child Care Facilities:³

Legal framework:	Legal requirements Ascertain whether the laws, regulations, and other measures already in place are commensurate with the ML/TF/PF risks identified
<i>Formation, Capacity, Powers and Objects</i>	a) The organisation responsible for the RCCF must be registered as a Welfare Organisation with the responsible Ministry. This is currently the Ministry of Health and Social Services in terms of Section 19(1) of the National Welfare Act, 1965 (Act No.79 of 1965).

³ Minimum Standards for residential child care facilities in Namibia, March 2009.

	<p>b) RCCFs must also be registered with the Ministry of Gender Equality and Child Welfare, as required by Section 42 of the Children’s Act 1960 (Act No. 33 of 1960).</p>
<p>Administration:</p>	<p>The organisation or association wishing to establish and operate a RCCF must have a file (updated regularly) which provides detailed background information about itself on the following:</p> <ul style="list-style-type: none"> a) The file should provide evidence of the good standing and reputation of the organisation or association that would warrant placement of children in their care; b) The file should contain information outlining the constitution, policy, management and regulatory arrangements, and structure of the organisation or association. It should also provide evidence of when and how the organisation or association was formed, its expertise and area(s) of competences; c) The file should include financial records for the last 2 years (or since the organisation or association was formed if this is shorter). These records should include an overview of available funding and capital of the organisation or association; d) In the case of foreign (non-Namibian registered) organisations, evidence must be provided to show that all necessary legal permissions to operate in Namibia are in place and documented.

Transparency and accountability	<p>a) The RCCF has an updated strategic plan and annual work plans which are submitted to the responsible Ministry regularly;</p> <p>b) The RCCF produces an annual report including an audited financial report (audited by an external accountant) that is sent to the responsible Ministry and donors.</p>
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4.2.2 Section 21 Companies under the Namibian Companies Act:⁴

Legal framework: Companies Act	Legal requirements Ascertain whether the laws, regulations, and other measures already in place are commensurate with the AM/TF/PF risks identified
<i>Formation, Capacity, Powers and Objects</i>	A non-profit association incorporated under section 21 must state its object in its Memorandum of Association.
Administration	<p>a) On incorporation of a company, notice of the registered office and of the postal address must be given to the Registrar;</p> <p>b) A company must not issue or send to any person in Namibia any trade catalogue, trade circular or business letter bearing the company’s name unless the directors’ names or initials are displayed;</p> <p>c) Every company must have at least one director who has not been convicted of theft, fraud, forgery or uttering a forged document, perjury, an offence under any law for the prevention of corruption, or any offence whether in Namibia or elsewhere.</p>

⁴ Namibian Companies Act, 2004 (Act No.28 of 2004)

<p>Transparency and accountability</p>	<ul style="list-style-type: none"> a) A company must, at every annual general meeting, appoint an auditor or auditors; b) Every company must keep, in the official language, accounting records which are necessary fairly to present the state of affairs and business of the company and to explain the transactions and financial position of the trade or business of the company; c) The directors of a company must, in respect of every financial year of the company, prepare annual financial statements and must present them before the annual general meeting of the company.
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4.2.3 Non-Profit Organisations registered as Welfare Organisations as per The National Welfare Act 79 of 1965:⁵

<p>Legal framework: The National Welfare Act 79 of 1965</p>	<p>Legal requirements Ascertain whether the laws, regulations, and other measures already in place are commensurate with the AM/TF/PF risks identified</p>
<p><i>Formation, Capacity, Powers and Objects</i></p>	<ul style="list-style-type: none"> a) For welfare organisations to that wishes to commence operations which include deriving funds wholly or partly from the State or from a local authority or from contributions collected from the public, such organisation should be registered as such and authorised, and issued with a certificate to collect funds;

⁵ SOCIAL WELFARE (1965) - National Welfare Act 79 of 1965 (annotated).

	<p>b) A welfare organisation which is registered or deemed to be registered under the Companies Act and which is precluded by the provisions thereof from collecting contributions in Namibia, may collect contributions in Namibia during the period specified in a certificate issued to it by an officer.</p>
<p>Administration:</p>	<p>a) Section 21 welfare organisation shall be registered under the Companies Act and governed in accordance with a written constitution;</p> <p>b) Welfare organisations are required to select a managing committee, comprising of not less than seven members.</p> <p style="padding-left: 40px;">I. Such committee shall keep such books, accounts and registers and from time to time furnish such reports and returns as may be prescribed;</p> <p style="padding-left: 40px;">II. The reports and returns shall be furnished to the board and the board shall deal therewith in such manner as may be prescribed;</p> <p>c) Every person who collects contributions for a registered welfare organisation shall have in his possession and shall produce for inspection at the request of any person specially authorised thereto by a local authority or by the registrar, or of any person from whom he collects contributions, a document of authority in the prescribed form, granted to him by such person or body as may be prescribed in relation to the particular type of organisation, or a distinctive badge approved by the board.</p>
<p>Transparency and accountability</p>	<p>a) The Minister may appoint an officer in the public service (an inspecting officer) who may generally or in respect of any particular case and in consultation with the board:</p>

	<ol style="list-style-type: none"> I. inspect any aspect of the affairs or activities of such welfare organisation and examine all documents relating thereto; and II. examine and audit the books, accounts and other documents relating to the financial affairs of such welfare organisation; <p>b) The Minister may, after consultation with the board, by order in writing under his hand, direct any person holding or having the control of any money, securities or other property representing contributions collected contrary to the provisions of the Act, to retain possession or control thereof until the Minister has made a further order in regard thereto.</p>
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In terms of compliance with the FATF Recommendations, the fit and property due diligence measures in all NPO sub-sectors requires room for improvement. The threat elements highlighted herein reflect that beneficial owners (especially those managing NPOs) are involved in most of the offences associated with the NPOs. Although owners and managers of such NPOs are identified by prudential regulators or licensing bodies, such identification falls short of beneficial ownership due diligence measures as per the FATF Recommendations.

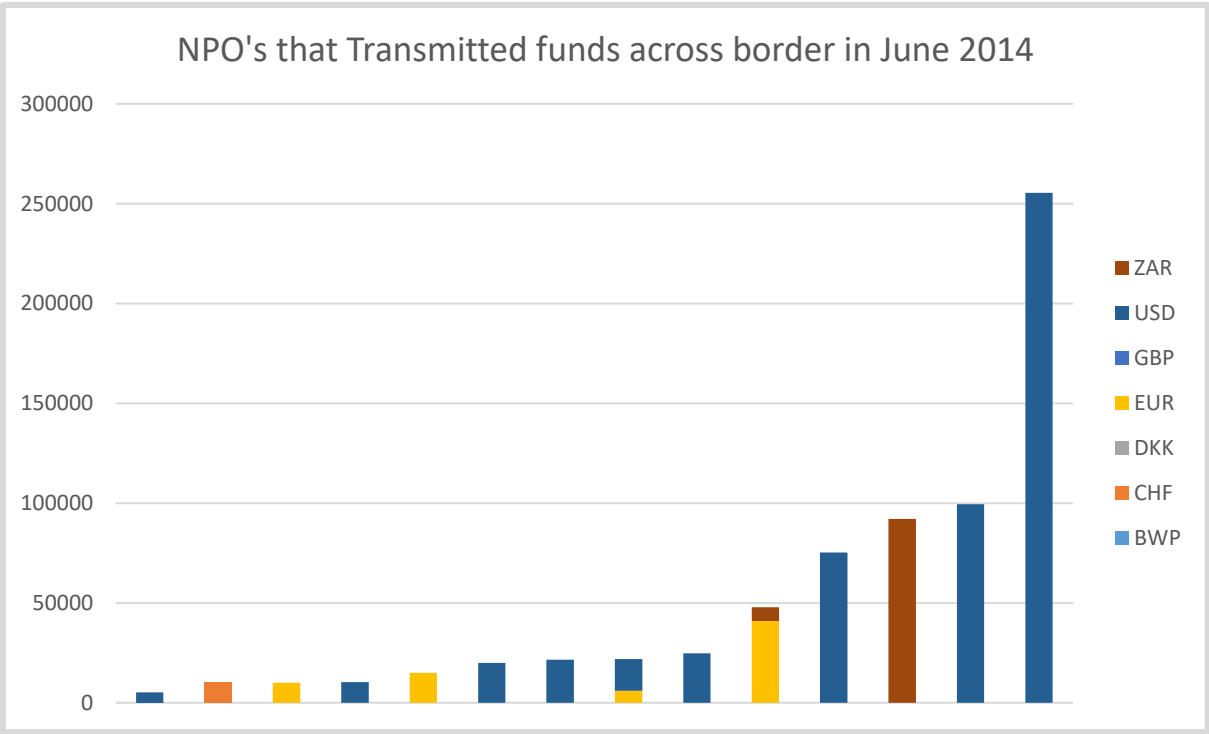
5. Understanding from the Financial Service Providers (Banks) regarding transacting behaviour of the NPOs.

The FIC randomly selected NPOs that had international transactions that were recorded on the Cross Border Foreign Exchange Transaction Reporting System (CBFERTS) from the Exchange Control Division at the Bank of Namibia. The focus was on cross border transactions as these funds are more susceptible to be used for

terrorism financing and the financing of proliferation activities. The FIC assessed the following factors with each of the selected NPO's.

NPOs enjoy the public trust, have access to considerable sources of funds, and are often cash-intensive. Furthermore, some NPOs have a global presence that provides a framework for national and international operations and financial transactions, often within or near those areas that are most exposed to terrorist activities. In some cases, terrorist organisations have taken advantage of these and other characteristics to infiltrate some NPOs and misuse funds and operations to cover for, or support terrorist activities. For these reasons, understanding the transactional behaviour of NPOs involved in cross border remittances is critical.

Below is the analysis of NPOs involved in cross border outgoing remittance transactions during the period 2014- 31 December 2018.



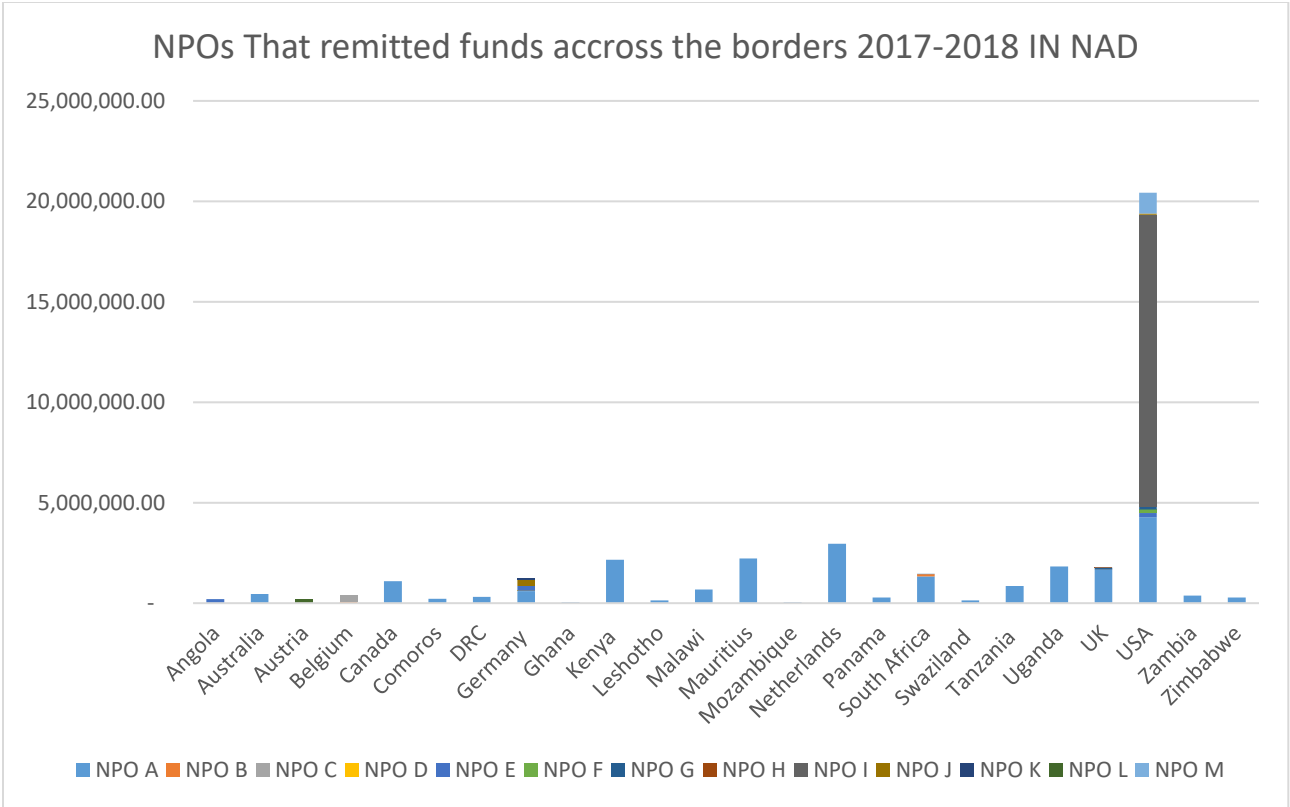
The diagram above shows values transmitted by NPOs in the month of June 2014. The aim of the analysis reflects the top NPOs that remit funds across the borders, and in what currencies and to which countries. The amounts involved range from NAD 10,000 – 250,000 with the top five being NPOs remitted to the United States of America, United Kingdom, South Africa, Botswana and European countries respectively.

5.1 2018 Update

Bank statements were obtained from the commercial banks in order to perform an analysis of the cross border (outgoing) remittance transactions on the top 5 entities as was identified in the earlier study as per above in. No cross border transactions were observed on these entities, ruling out TF risk at this stage, with the exception of one NPO, which is currently under analysis to understand the purpose and destination of those transfers. Given the non-existence of terrorist activities locally, it can only be inferred that TF risks would arise if local NPOs remit funds to jurisdictions that are exposed to terrorist activities.

5.2 2019 Update

The diagram below shows those entities that remitted funds during the period 2017 to 2018. The object was to identify NPOs remitting cross border and whether any funds were transferred to high risk countries, especially those known to have terrorism or terrorist financing activities. The transactions mostly consist of transfers to other member countries, for donor purposes and for travelling expenses.



6. The NPO sector and the risks related to Terrorism Financing

6.1 Vulnerabilities and Threats of NPOs to TF abuse in Namibia

Vulnerabilities

- a. Geographical exposure - NPOs are exposed to stakeholders in various geographical areas. Some have programmes that are delivered in multiple areas;
- b. Volunteering workforce – Some NPOs comprise of staff that are mostly volunteering. Most staff do not necessarily have the skills in risk management or better yet, combatting ML/TF;
- c. Access to international donors and high level of cash usage - Observations show that NPOs seek donations, with a high probability that such are availed in cash. Cash leaves little audit trail;
- d. Current laws and regulations – the majority of NPOs in Namibia are Section 21 Companies and the regulator does not at present enforce the act duly. Further, NPOs are exempted from paying tax and are subjected to less due diligence from authorities. This further enhances its attractiveness to criminals;
- e. Fit and proper reviews around beneficial ownership: The threat elements highlighted herein reflect that beneficial owners (especially those managing NPOs) are involved in most of the offences associated with the NPOs. Although owners and managers are identified, usually at licensing, such identification falls short of beneficial ownership due diligence requirements as per the FATF Recommendations; and
- f. Namibia is currently facing social challenges, which are partly motivating people to open up child home facilities, mainly to absorb homeless children. The Ministry of Gender also provides NPOs certain financial contributions, depending on the number of children taken under care.

6.2 Terrorist Financing threats on the NPO sector in Namibia

The attached list of cases emanating from SARs/STRs (Annexure 1) shows that most of the threats of abuse that could undermine NPO vulnerabilities are potentially fraud, tax evasion and ML related, with very minimal cases reflecting potential TF or PF. This trend is also observed in the summary of cases below within the domains of LEAs.

6.2.1 Criminal cases involving NPOs (Updated: 2018)

A request for case studies was distributed to the Ministry of Safety and Security. In response to this request, 3 cases were submitted to the FIC.

Case 1: The suspect, an employee of a welfare organisation, transferred funds (NAD 20 250.00) from the Association's account to her private account without approval (This is potentially fraud). Prosecution in the matter is not yet finalised but fraud is a predicate offence for ML.

Case 2: The case involves a residential child facility (an unregistered company). The suspect, supposed owner, pretended to be running a charitable organisation and has solicited NAD 80 000.00 from the American Embassy under false pretences. The funds were deposited into the suspect's personal account. The suspect has spent the money personally and not for the charitable purposes. The case is currently on the court roll.

Case 3: The suspect, a Zimbabwean national in Namibia received funds from an unknown source and thereafter transferred an amount of NAD 104 000.00 to the Prophetic Healing and Deliverance Ministries in South Africa.

Case 4: A mosque's account is suspected of being used to finance terrorism in the Middle East.

6.3 Categorising NPO's into different risk rating

Low Risk	Medium Risk	High Risk
<p>The donor has explicit charitable purposes and discloses how funds are used with specificity.</p>	<p>The donor has general charitable purposes and discloses how funds are used with specificity.</p>	<p>The donor has general charitable purposes and does not disclose how funds are used.</p>
<p>The charity and the donor have a written grant agreement that contains effective safeguards. For example, provisions addressing proper use of funds by the donor, delineation of appropriate oversight, and programmatic verification.</p>	<p>The charity and the donor have a written grant agreement with limited safeguards.</p>	<p>The charity and the donor do not have a written grant agreement.</p>
<p>The donor has an existing relationship with the charity.</p>	<p>The donor has existing relationships with other known charities but not with this charity.</p>	<p>The donor has no prior history with any charities.</p>

The donor can provide references from trusted sources.	The donor's references are from sources with which the charity is unfamiliar.	The donor can provide no references or sources to corroborate references provided.
The donor has a history of legitimate charitable activities.	The donor is newly or recently formed, but its leadership has a history of legitimate charitable activities.	The donor has little or no history of legitimate charitable activities.
Charity performs on-site donor due diligence through regular audits and reporting.	Charity performs remote donor due diligence through regular audits and reporting.	Charity performs no donor due diligence, or due diligence is random and inconsistent.
Donor provides documentation of the use of funds in the form of video, receipts, photographs, testimonies, and written records.	Donor provides documentation of the use of funds. Documentation may only include receipts and written records.	Donor provides no documentation of use of funds.

<p>The charity disburses funds in small increments as needed for specific projects or expenditures.</p>	<p>The charity authorizes donor discretion within specified limits.</p>	<p>The charity disburses funds in one large payment to be invested and spent over time or for unspecified projects selected by the donor.</p>
<p>Reliable banking systems or other regulated financial channels for transferring funds are available and used by the donor, subjecting such transfers to the safeguards of regulated financial systems consistent with international standards.</p>	<p>Reliable banking systems or other regulated financial channels for transferring funds are not reasonably available for the donor's relevant activity, but the charity and the donor agree on alternative methods that they reasonably believe to be reliable, trustworthy, and protected against diversion.</p>	<p>The donor does not use regulated financial channels or take steps to develop alternative methods that the charity and donor reasonably believe to be reliable, trustworthy, and protected against diversion.</p>
<p>Detailed procedures and processes for the suspension of donor funds are included within the written agreement and enforceable both in the</p>	<p>Detailed procedures and processes for the suspension of donor funds are included within the written agreement</p>	<p>There exist no procedures or processes for suspension of donor funds in the event there is a breach of the written agreement.</p>

United States and at the donor's locale.	but may not be enforceable at the donor's locale due to instability or other issues.	
The charity engages exclusively in charitable work in the U.S. or in foreign countries/regions where terrorist organisations are not known to be active.	The charity engages in some work in foreign countries/regions where terrorist organisations may be active.	The charity primarily engages in work in conflict zones or in countries/regions known to have a concentration of terrorist activity.

7. Applying the vulnerabilities/ threats to the identified entities that transmit funds

Among the NPOs that were transmitting funds from outside, the following measures/risk mitigation controls were assessed to enable us to understand the risks of Terrorist financing.

Risk Mitigation/Controls
a) The purpose and objectives of the stated activities of the NPO;
b) The identity of person(s) who own, control or direct their activities, including senior officers, board members and trustees;
c) Whether the NPOs issue annual financial statements that provide detailed breakdowns of income and expenditure;
d) Whether the NPO's have controls in place to ensure that all funds are fully accounted for, and are used in a manner that is consistent with the purpose and objectives of the NPO's stated activities;

e) Whether the NPOs are licensed or registered;
f) Whether the associated NPOs and beneficiaries are known;
g) Whether the NPOs maintain, for a period of at least five years, records of domestic and international transactions, and such information is made available to competent authorities upon appropriate authority; and
h) Whether the beneficial owners or management are genuinely suspected to have been involved in potential criminal activities or convicted.

8. Sectoral vulnerability assessment outcomes

The attached annexures present the assessment methodology employed to arrive at vulnerability positions. Primarily, NPOs involved in cross border remittances and the assessed level of adequacy of current legislation to combat MT/TF/PF risks were significant factors in such assessment. The table below shows outcomes of such vulnerability assessments per sector:

Activities	Number of Entities	Type	Risk Rating
Religion	628	Section 21 Companies	H
Residential Child Facilities	22	Welfare Organisation	H
Various Welfare Organisations	464	Welfare Organisation	H
Culture and recreation	23	Section 21 Companies	L
Law, advocacy and politics	19	Section 21 Companies	L
Others	786	Section 21 Companies	L
Total	1942		

As a result of the outcomes above, religious and child welfare facilities are highly vulnerable to abuse.

10. Policy recommendations for a risk-based supervision of NPOs

- a) Market entry: NPOs should be required to be licensed or registered with the relevant authority and the FIC prior to commencing operations;
- b) NPOs should be required to maintain information on the purpose and objectives of their stated activities;
- c) NPOs should be required to maintain information on ultimate beneficial owners, and this information should be publicly available;
- d) NPOs should be required to have appropriate controls in place to ensure that all funds are fully accounted for, and used in a manner that is consistent with the purpose and objects of the NPO's stated activities;
- e) NPOs should be required to obtain reasonable measures to confirm the identity, credentials and good standing of donors in order to mitigate against risks of engaging those who are not fit and proper. Such records should be kept for authorities to verify. In the same vein, the legal framework should require of all NPOs to gain assurance that their beneficiaries are not involved and/or using the charitable proceeds to support terrorist activities, advancing tax evasion or other financial crimes; and
- f) NPOs should be required to maintain, for a period of five years, records of domestic and international transfers that are detailed enough to assist in the determination of whether funds have been used for their intended purpose. This information should be available to competent authorities such as the FIC and other Regulators, as well as the general public, where possible.

11. Way forward

- a. The capturing of NPOs as Accountable Institutions (AIs) in terms of the FIA, in order to mitigate the current inadequacy in relevant legislation. Subjecting NPOs to the relevant risk based supervisory measures;.
- b. Clear policy formulation with the above recommendations at national level with the aim of promoting accountability, integrity and public confidence (FIC, in conjunction with Ministries involved with NPOs);

It is crucial that in addressing the identified risks, policy formulations emanating from FIA obligations inform other public policies in order to create synergies in achieving the objectives of mitigating ML/TF/PF risks. Further, collaboration is required at national level as success in mitigating these risks should be driven holistically at national level. For example, the Companies Act, The National Welfare Act, and the Minimum Standards for Residential Child care Facilities, etc., should all equally strive for measures that minimise risks of vulnerabilities highlighted herein. The following are further recommended as means to help strengthen vulnerabilities in the sector:

- i. Allocation of human and financial resources for public outreach, education and awareness activities around NPOs and their ML/TF/PF vulnerabilities;
- ii. Periodically re-assess the sector on potential vulnerabilities to terrorist activities; and
- iii. Introduce thresholds to assist with a risk-based monitoring and supervision related to identification of reporting obligations in line with the FIA sections 22, 32 and 34.

12. Conclusion

Although FATF Recommendation 8 speaks to TF, local observations indicate that NPOs are abused for ML as well. This study is aimed at helping Namibia identify her vulnerabilities in the NPO sector and help relevant stakeholder take the necessary.

The Compliance Monitoring and Supervision Division will use observations and outcomes from this assessment to inform all its supervisory activities. The attached list of cases shows that most of the threats observed to undermine NPO vulnerabilities are fraud and ML related with very minimal cases reflecting potential TF or PF.

This analysis, like any other risk assessment is not static as it evolves along with relevant factors. There is thus a need for a continuous update on the outcomes as reflected herein.

ANNEXURE 1:

CASE STUDIES INDICATING POTENTIAL ML AND TF ACTIVITIES IN NPOs:

2015/20

2015

1.

Organisation Name	XXX MOSQUE
Reporting Entity	LOCAL BANK
Organisational Objectives	- Church
Escalated	No
CASE Number	N/A
Reason for suspicion	<ul style="list-style-type: none"> - Iranian national; - Church account used for personal activities; - Multiple deposits from possible members of church; - Funds are depleted as soon as deposits are made; - No trace of church related expenses on what money is spend.
Report Indicators	- Money Laundering
Involved Amount (N\$)	N\$45,000.00 (2013-2019)
Method used	In branch cash deposits/Transfers
Status	Set as Low Priority

2018

1.

Organisation Name	XXXX Ministries
Reporting Entity	LOCAL BANK
Organisational Objectives	Church
Escalated	Yes
CASE Number	CASE XXXXX
Reason for suspicion	<ul style="list-style-type: none"> - Alleged prophet; - Multiple deposits made to the account referenced "tithe" and "seed" paid into personal account; - Individual accounts used to collect funds in the name of NPO; - Funds are possibly paid by church members
Report Indicators	- Tax evasion
Involved Amount (N\$)	N\$ 5,707,150.19 (2013-2019)

Method used	In branch cash deposits and Electronic Funds Transfers
Status	Currently investigated by LEA for involvement in rhino horn smuggling

2.

Organisation Name	XXXXXXX ORGANIZATION
Reporting Entity	LOCAL BANK
Organisational Objectives	- To provide health care services
Escalated	Yes
CASE Number	CASE-XXXXXX
Reason for suspicion	- Funds being transferred from South Korea (High Risk Jurisdiction in terms of Proliferation Financing); - Funds being transferred as "donations"; - Subsequent transfer of funds to founding member accounts;
Report Indicators	- Tax evasion; - Embezzling of funds
Involved Amount (N\$)	N\$ 4,420,909.84 (2013-2019)
Method used	Electronic Funds Transfers
Status	Escalated for further investigation

3.

Organisation Name	XXXXX Ministries
Reporting Entity	N/A
Organisational Objectives	Church
Escalated	N/A
CASE Number	XXXXXXXXXXXXXXXX
Reason for suspicion	- Subjects suspected of involvement in human trafficking and Money laundering; Regular and cash deposits made to accounts are reflected as "tithes" and "rent"; - Funds being transferred as "donations";
Report Indicators	-Human Trafficking; - Fraud / Theft
Involved Amount (N\$)	N\$ 25,163,902.43 (2013-2019)
Method used	In branch cash deposits and Electronic Funds Transfers
Status	Reports disseminated for further investigation criminally and potential tax evasion (MoF)

4.

Organisation Name	XXXXXXXXXXXXXXXXXXXX CHURCH
Reporting Entity	N/A
Organisational Objectives	N/A
Escalated	N/A
CASE Number	N/A
Reason for suspicion	<ul style="list-style-type: none"> - Subjects suspected of possible money laundering on behalf of the church in Namibia; - Numerous funds deposits referenced "tithe" made into personal account of subject followed by subsequent transfers to South Africa;
Report Indicators	<ul style="list-style-type: none"> - Human Trafficking; - Fraud
Involved Amount (N\$)	N\$493,000.00 (2016-2018)
Method used	In branch cash deposits, Electronic Funds Transfers, Pay 2 Cell payments
Status	Reports disseminated to MOF & LEAs

5.

Organisation Name	XXXXX Church
Reporting Entity	FIC - Internally Generated
Organisational Objectives	Church
STR Number	
Escalated	Yes
CASE Number	XXXXXXXXXXXXXXXXXXXXXXX
Reason for suspicion	<ul style="list-style-type: none"> - Church had a contract with entity; - Bank account details of service provider were changed; - Church possible victim of scam/fraud; - Possible that emails were intercepted; - Funds were accordingly paid into wrong bank account;
Report Indicators	<ul style="list-style-type: none"> - Fraud; - Forgery; - Scam
Involved Amount (N\$)	N\$ 1,400,839.45(2018)
Method used	Electronic Funds Transfers
Status	RFI to Rep of S.A

6.

Organisation Name	XXXXX XXXX
Reporting Entity	XXXXXXXX XXXXXXXX
Organisational Objectives	Church
STR Number	XXXXXX
Escalated	No
CASE Number	N/A
Reason for suspicion	<ul style="list-style-type: none"> - Subject is the pastor of the church; - Funds paid into the bank account for church related purposes; - Funds possibly being paid by church members; - Funds are depleted as soon as deposits are made;
Report Indicators	<ul style="list-style-type: none"> - Money laundering; - Tax evasion
Involved Amount (N\$)	N\$190,758.06(2018)
Method used	Electronic Funds Transfers
Status	Set on Low Priority

7.

Organisation Name	XXX XXXX
Reporting Entity	XXX XXXX
Organisational Objectives	To spread the gospel of Jesus Christ according to the book facilitate Spiritual Development
STR Number	XXXX XXXXXXXXXXX XXXXXXXXXXX
Escalated	No
CASE Number	N/A
Reason for suspicion	<ul style="list-style-type: none"> - Multiple cash deposits made to the bank account; - Possible that church account is being used to conceal funds obtained in illicit manner;
Report Indicators	<ul style="list-style-type: none"> - Tax evasion - Adverse reports
Involved Amount (N\$)	N\$100,500.00 (2018)
Method used	In branch deposit and Electronic Funds Transfer
Status	Set on Low Priority

8.

Organisation Name	XXXXXXXXXX XXXXXXXXX
Reporting Entity	N/A
Organisational Objectives	- To spread the gospel of Jesus Christ according to the book facilitate Spiritual Development
STR Number	XXXX
Escalated	No
CASE Number	N/A
Reason for suspicion	- Entity allegedly used to commit fraud/ Theft
Report Indicators	- Fraud; - Money Laundering; - Other theft; - Tax evasion;
Involved Amount (N\$)	N\$41,421,549.16
Method used	Cash deposits and Electronic Funds Transfers
Status	Reports disseminated to MOF & NAMPOL SPECIAL BRANCH WINDHOEK

2019

1.

Organisation Name	XXXXXXX XXXXXXXX XXXXXXXXX
Reporting Entity	XXXXXXXXXXXXXXXXXXXX
Organisational Objectives	Church
STR Number	XXXXXXXXXXXXXXXXXXXX
Escalated	No
CASE Number	N/A
Reason for suspicion	- Church belongs to self-proclaimed pastor; - Pastor and his wife recently arrested on charges of fraud and Money Laundering; - Inconsistent payments and withdrawals made to and from the account; - Possible that funds are send to SA;
Report Indicators	- Adverse reporting in local press; - Structuring;
Involved Amount (N\$)	N\$400,000.00 (2013-2019)
Method used	Cash deposits/withdrawals and Electronic Funds Transfers
Status	Set on Low Priority

2020

1.

Organisation Name	XXXXXXXXXXXXXXXXXX
Reporting Entity	LOCAL BANK
Organisational Objectives	- Charitable organisation in the front line of world health challenges
STR Number	XXXXXXXXXXXXXXXXXXXX
Escalated	Yes
CASE Number	XXXXXXXXXXXXXXXXXXXX
Reason for suspicion	<ul style="list-style-type: none">- Account holder is an employee of XXXXX;- Possible illegal deposit taking into personal account;- Funds then being transferred from SA followed by subsequent transfers back to SA;- Funds are then withdrawn in SA via cash withdrawals.
Report Indicators	<ul style="list-style-type: none">- Illegal deposit taking- Terrorism financing
Involved Amount (N\$)	N\$ 440,361.00
Method used	Electronic funds transfers
Status	Pending case