

Är ideella organisationer bankernas största risk?





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Are nonprofit organizations the biggest risk for banks?

Penningtvättsdagarna 2025

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**Or could NPO sector be
the great partner for banks?**

International and European framework

Right of Civil Society Organization's to **seek and secure resources to carry out its statutory activities**; integral part of the right to Freedom of Associate.

Why regulate?

- Empower donors
- Enhance philanthropy
- Increase public confidence in the third sector
- Discourage fraud
- Promote the efficient use of funds complementary regulations

ECNL's Global Expert Hub on AML/CFT currently includes over 80 activists from more than 45 countries.

Through the Hub, activists are empowered to apply AML/CFT standards in their local contexts and rebut attacks on their operations.



European Center for
Not-for-Profit Law

Finnish framework



- **The National Risk Assessment of Money Laundering and Terrorist Financing in the NPO Sector 2024** was prepared by the NPO project group of the Ministry of the Interior during December 2022-November 2024. FAFT defines:

“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”.”⁵⁷

- Public authorities, supervisors in accordance with the Act on AML/TF and NPOs of different sizes contributed to the preparation of the risk assessment
 - Consultations and workshops

Finnish framework



- The risk assessment describes the threats, vulnerabilities and risks of ML/TF in all the operations of NPOs. The risk assessment also examines the risks of ML/TF in relation to selected phenomena
 - General risks for the entire NPO sector
 - Identified 12 sub-sectors and their specific risks
 - From the TF perspective, the most significant risks can be found in unregistered associations; certain religious and ideological associations; and unestablished humanitarian and international aid organizations.
- The risk assessment publication is aimed to increase awareness of the Finnish NPO sector among obliged entities specified in the Act on AML/TF supervisory authorities as well as the sector itself.
 - For an individual NPO to identify the risk of ML/TF
 - For obliged entities taking a risk-based approach towards NPO customers

Finnish framework



- Advisory Board on Civil Society Policy (Ministry of Justice) carried out survey on **banking services** in January 2024
 - The aim was to find out whether NPOs have sufficient access to banking services, whether the services are reasonably priced and what kind of changes or developments are needed in banking services.
- The results of the survey will be used in the project of banking services (Ministry of Finance) which started in October 2024 -> end of 2025
 - Individuals are currently able to use basic banking services on average reasonably well.
 -but companies and associations have some significant difficulties in accessing banking services.

VaLa and the bank sector (Finance Finland)



VaLa represents more than 80 NPOs and over million of Finnish donors.

For Finance Finland VaLa represents a sector that sends a lot of invoices.

Co-operation has continued for years

- Form of agreement between a charity and a monthly donor accepted and be to used by all Finnish banks (E-INVOICE OR DIRECT PAYMENT ORDER OF DONATIONS)
- Ongoing co-development of the mobile payments for donations – Vipps MobilePay
- Open dialogue and updates of current issues and surveys

TACK!

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Law



Är ideella organisationer bankernas största risk?



Utgångsläget

- Korruption och terrorfinansiering är primära risker i CSO.
- Låg risk för penningtvätt.
- Ökat fokus kring sanktioner:
Dual-use goods. Materialhjälp i händerna på terrorister.
Kanalisering av medel, hot även i små verksamheter.

Uppdraget



Rådgivning kring riskbedömning, on-boarding och off-boarding av medlemmar i Giva Sverige.

Observationer



- Behov att utveckla riskmedvetenhet.
- Strukturerat, dokumenterade arbetssätt, jämförbar logik med AML/CTF.
- CSOs motsvarande KYC på samarbetspartner/mottagare, inhämta VHM, granska årsredovisningar, historik, uppföljning/kontroller.

Rekommendationer



- Potential att skapa branschpraxis genom Givas Kvalitetskod, utveckla stöd och verktyg för att öka medvetenheten och arbeta mer riskbaserat.
- Mer samverkan med banksektorn för att skapa gemensam förståelse för kundkännedomskrav och ge bättre förutsättningar för monitorering.
- Med hänsyn till utökade krav i och med AMLR kommer detta blir än mer angeläget.



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Vi pratar gärna vidare!



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