

**The below is a summary of questions and comments received by the Civil Society Information Centre Namibia (CIVIC +264) via email and during the livestream of the *FIC Briefing Meeting with Civil Society Regarding the Registration of Non-Profit Organisations and the Filing of Annual Returns on 18 September 2023***

Summary of the questions and comments addressed to the Financial Intelligence Centre (FIC) for their attention:

**1. Concerns about Restrictiveness for CSOs:**

- 1.1. FIC is perceived to be creating a more restrictive environment for Civil Society Organisations (CSOs) to operate in.
- 1.2. Some regulations require CSOs to provide beneficiary information, potentially compromising confidentiality, especially for sensitive cases like counselling for GBV victims.
- 1.3. Instances of high-profile cases involving prominent individuals have raised concerns for the safety of victims/survivors.

**2. Registration Process and Certificate:**

- 2.1. Clarity sought on the registration process, including whether there is an online platform for CSOs/NPOs/NGOs or if it's conducted via email.
- 2.2. Inquiry about whether FIC registration provides a certificate to streamline compliance with banks and reduce administrative burden.

**3. Requirements and Purpose for Registration:**

- 3.1. Query about the requirements, purpose, and implications of FIC registration for legally registered organisations, including potential gains or losses from registration.

**4. Proof of Authority or License for NPOs:**

- 4.1. Addressing concerns about the requirement for proof of authority or license for NPOs, and how it applies to various types of organisations.

**5. FIC Presenter Clarity:**

- 5.1. Expectations for the FIC presenter to be clear about what is expected and from whom.

**6. Specific Questions:**

- 6.1. Clarification needed on whether both foundation members and board members (directors) require ITC and police clearance checks.
- 6.2. Inquiry about how to handle founder details if there's insufficient space on the registration form.
- 6.3. Question regarding the use of WeTransfer for application submission.

**7. Re-Registration Query:**

- 7.1. Inquiry about whether re-registration with FIC is required if already registered with BIPA, or if an email with attached documents would suffice.

**8. Deadline Extension and Compliance Concerns:**

- 8.1. Advocacy for a deadline extension, exploring a mid-December 2023 date.
- 8.2. Questions about handling funds received through fundraising initiatives and concerns about the practicability of the deadline.

**9. Documentation Submission and Feedback:**

9.1. Report of document submission in June 2023 without receiving feedback from the FIC office.

**10. Family Trusts Registration:**

10.1. Inquiry about whether family trusts are also required to register with the FIC.

**11. Jurisdiction Classification and Professional Bodies' Status:**

11.1. Request for clarification on the meaning and distinctions between "low," "medium," and "high-risk" jurisdictions.

11.2. Inquiry about the registration process for professional bodies and the necessity of registration with FIC if not registered with BIPA.

**12. Timeline Feasibility and Communication Efficacy:**

12.1. Concerns about the feasibility of meeting the approaching deadline due to the extensive list of required documents and information.

12.2. Request for broader outreach through popular platforms like social media, NBC, and radio stations to increase awareness of FIC requirements and deadlines.

**13. Role of Banks and Practical Cutoff for Records:**

13.1. Inquiry about the role of banks in NPO FIC compliance and concerns about the practicality of collecting records for organizations with long histories of board member changes.

**14. Exemption Documentation Submission:**

14.1. Inquiry about where to submit documentation for exemption.

**15. Orphanage Concerns and Streaming Link Request:**

15.1. Concerns raised about potential closure of an orphanage due to the registration process and withdrawal of donors.

15.2. Request for the streaming link for the meeting for organisations and churches without representatives in Windhoek.

**16. Formal Communications and Ministerial Engagement:**

16.1. Advocacy for formal communications highlighting concerns and objections, addressed to FIC and copied to relevant authorities, emphasizing the impact on smaller and emerging NPOs.

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