

OF THE WORLD منظمة أطباء العالم LÄKARE I VÄRLDEN MEDICI DEL MONDO FICT FOI KÓGHOU DOKTERS VAN DE WERELD MÉDICOS DO MUNDO MÉDICOS S 世界医生组织 MÉDECINS DU MONDE 世界医生组织 DOCTORS OF THE WORLD ム LĂKARE I VĂRLDEN MEDICI DEL MONDO FICT FOI KÓGHOU DO ÉDICOS DEL MUNDO 世界の医療団 ÄRZTE DER WELT 국 RÉDECINS DU MONDE 世界医生组织 DOCTORS OF THE WORLD (A STICT OF WORLD LÀKARE I VĂRLDEN DOCTORS OF THE WORLD (A STICT OF MUNDO MÉDICOS DEL MUNDO 世界の医療団 ĂRZTE DER WELT 국 MÉDECINS DU MONDE 世界医 (A STICT OF MUNDO MÉDICOS DEL MUNDO 世界の医療団 ĂRZTE DER WELT (A STICT OF MUNDO MÉDICOS DEL MUNDO 世界の医療団 ĂRZ (A MEDICI DEL MONDO FICT POI TOU KÓGHOU DOKTERS VAN DE WERELD MÉDICOS DO MUNDO MÉDICOS DEL MUNDO 世界の医療団 ĂRZ

## Screening: what does it correspond to?

>> What? Screening, checking whether an individual or an entity is present on an international sanctions list (terrorism and terrorist financing, money laundering activities, etc.)

Sanctions lists: UN security council list, EU financial sanctions, US (OFAC), France (DG Trésor) ...

- >> How? Either online directly on the lists site, or via dedicated software that facilitates research (and better data protection)
- Why? Donors consider that screening limits the risk that their funds will be used directly or indirectly to finance terrorism. This has become a condition for being funded by almost all public donors (EU: ECHO, DEVCO United Nations France: CDCS and AFD Germany: GFFO United States: USAID, etc.)
- >> Who? The "stakeholders" of the funded project, namely the staff (headquarters and field + governance: Board of Directors, Directors), suppliers and operational partners.

## MdM screening procedure (1)

- MdM FR has a "screening" procedure since the end of 2018, which is an official procedure communicated to donors but temporary. The DDI is in charge of this procedure.
- MdM's "Positioning on anti-terrorism and anti-money laundering measures and their impact on international operations" (May 2021) includes the principles of the screening procedure..
- A final procedure was validated by the CA in April 2021 to allow for more systematic screening operations.
- The procedure must both:
- satisfy the demands of donors who may request "evidence" during audits (risk of ineligibility and termination of contract);
- establish an "MdM standard" to ensure that it is well understood by all and the least restrictive possible;



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## MdM screening procedure (2): modalities

- MdM FR acquired a dedicated software (BRIDGER) in May 2020 (used by NGOs such as CARE, ACF, HI, etc.).
- Screening is only done at headquarters via Human Resources (for staff), Logistics (for suppliers), Operations (for partners).
- The MdM standard is based on screening only the "key staff" of the project, and above a commitment of more than € 5k for Suppliers and Partners



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## MdM screening procedure (2): principles

- There must be written consent from any person screened
- A "positive hit" is not proof of being guilty, to be considered on a caseby-case basis. But we have to make a commitment to deal with the case quickly.
- MdM may decide to waive this procedure and not screen individuals or entities for security reasons.
- No "screening of beneficiary of the action": very sensitive subject with "development" donors (AFD in particular) who ask to screen in the event of cash distribution or "monetizable goods"