



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;



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**



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 case-by-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"