

**Non-Profit Organization (NPO)
RISK ASSESSMENT
QUESTIONNAIRE TO ASSIST IN DEVELOPING A
RISK BASED APPROACH TO
SUPERVISION AND MONITORING OF THE NPO SECTOR IN THE BAHAMAS**

This questionnaire is designed to assist authorities in developing a risk based approach to the supervision and monitoring of the NPO Sector within The Bahamas and to ensure that the sector is not abused for terrorist financing. Additionally, this questionnaire seeks to obtain information on the nature of operations, administration, structure, purpose, activities and procedures in order to determine any money laundering, terrorist financing and proliferation financing risks to which an NPO might be exposed.

Please complete each section and indicate "N/A" where a question does not apply. Additional paper (clearly marking the particular question) may be used if necessary.

PART 1 - NPO Information

Name of NPO:	
Address of Main Office or Place of Operation in The Bahamas:	
Mailing Address:	
Contact Person:	
Business Telephone:	Business Email:
Business Fax:	Website:

PART 2 - Name and contact information of the Controller(s)*:

Name:	<i>(Last)</i>	<i>(First)</i>
Phone Contact:	<i>(Work/Home)</i>	<i>(Mobile)</i>
E-mail:		
<i>(Please use a separate paper to include information on other Controllers*)</i>		

PART 3 – General Information on NPO

Have you submitted the Non-Profit Organization application form to the Registrar General's Department?	YES	NO
Does the NPO operate at more than one office/location within The Bahamas?	YES	NO
Which of the following objects do you promote? <i>(you can tick more than one box)</i>	Religious	
	Charitable	
	Educational	
	Scientific	
	Historical	
	Fraternal	
	Literary	
	Sporting	
	Artistic	
Other (specify		
How long have you been licensed/incorporated?	1 – 3 Years	
	3 – 5 Years	
	5 – 10 Years	
	10 Years and above	
	Not Licensed/ Incorporated	
Do you file a register of Officers and Directors with the Registrar General's Department?	YES	NO
If you answered yes to the above question , how often do you file the register of Officers and Directors with the Registrar General's Department?	Annually	
	Occasionally	
	Only when a certificate of Good Standing is needed	
Do you have a business license?	YES	NO
Do you have a Registered Agent?	YES	NO
If you answered yes to the above question is your Registered Agent regulated by one of the Financial services regulators i.e. Securities Commission, Compliance Commission, Central Bank of The Bahamas or Insurance Commission?	YES	NO
Does the NPO have a parent body or is affiliated with any other NPO (local or international)?	YES	NO

If you answered 'YES' to the above question, provide the names, addresses, purposes and activities of those NPOs.

NAME	ADDRESS	PURPOSE/ACTIVITY

Do you receive donations?		YES	NO
If you answered yes to the above question , are your donors known to you or anonymous?		YES	
		NO	
		YES & NO	
PART 4 - NPO Banking/Accounting Information			
Does the NPO utilize a Bahamian or other jurisdiction's regulated financial institution to facilitate its operations (payment of salaries or disbursements) ?		YES	NO
If no, please explain the method of settling expenses and disbursement and receiving donations:			
What is your annual turnover?		< \$10,000	
		\$10,000 - \$50,000	
		\$50,001 - \$100,000	
		> \$100,000	
What was the NPO's annual inflow, outflow and asset size for the last four (4) years?			
YEAR	ANNUAL INFLOW	ANNUAL OUTFLOW	ASSET SIZE
What percentages of last year's receipts were derived from the following methods of payment (Please provide an annual estimate of the percentage of payments received in each category in the Table below)			
TYPE OF PAYMENT		% OF ANNUAL INCOME	
CASH			
CHEQUE			
CREDIT CARD			
DEBIT CARD			
WIRE TRANSFER			
MONEY REMITTANCE			
STANDING ORDERS			
VIRTUAL ASSETS			
GIFTS OR DONATIONS			
What is the estimated value of outflows and inflows in the last fiscal year sent to or received from foreign jurisdiction(s):			
Outflows:		Inflows:	
Briefly explain how payments are verified by the NPO:			
Please indicate in order of priority below, the top three (3) primary sources of income (e.g. Government subventions, donations, membership dues, etc.):			
No.	PRIMARY SOURCE OF INCOME	% OF PRIMARY SOURCE	
1.			
2.			
3.			
PART 5 - NPO Staff and/or Volunteers			
Indicate the number of staff members and/or volunteers of the NPO (<i>please provide organizational chart, if any</i>)			
STAFF MEMBERS:		VOLUNTEERS:	
What is the average period of employment? (years and/or months):			
What is the process for recruiting?			
PART 6			
(A) NPO Compliance Policies and Procedures			
Has the NPO developed or implemented compliance policies and procedures?		YES	NO
Identify conduct which may involve one or more of the following identified risks			
NO.	IDENTIFIED RISK (SEC.2 OF PROCEEDS OF CRIME ACT, 2018)	YES	NO
1.	Corruption (<i>e.g. bribery, extortion, misconduct of public officer committed by or on behalf of a public officer</i>)		

2.	Cybercrime (<i>any criminal activity using a computer. e.g., fraud, stealing identities, violating privacy</i>)		
3.	Human Trafficking (<i>see sec.2 of the Proceeds of Crime Act, 2018</i>)		
4.	Money Laundering (<i>see sec. 2 of the Proceeds of Crime Act, 2018</i>)		
5.	Financing of proliferation and weapons of Mass destruction (<i>see FIRST SCHEDULE of the Anti-Terrorism Act (Amendment), 2019</i>)		
6.	Terrorism or financing of terrorism (<i>see sec.2 of the Anti-Terrorism Act, 2018</i>)		

Please note that all Bahamas laws can be accessed online at: <http://law.bahamas.gov.bs>

Has your NPO conducted transactions within the last 12 months with any of the following?

members, individuals or companies based in any of the countries listed by the United Nations as Terrorist Countries? (see list on the Registrar General's website <http://rgd.bahamas.gov.bs/rgd>)

individuals or other persons who are politically exposed persons (PEPS)? (*see sec. 2 of the Proceeds of Crime Act, 2018*)

If you selected any option in the above, which countries were involved and how many transactions were conducted with each country?

Please also indicate the number of PEPs with whom transactions were conducted:

Does your NPO cross-reference the names of staff, donors or volunteers with any list of designated individuals or entities on the UN Consolidated Sanctions List? YES NO

If YES, state which lists were checked:

How often are transaction records reviewed for suspicious patterns of activity?
Fortnightly **Quarterly** **Bi-annually** **Annually**

What identification information does the NPO collect from donors? (*you can tick more than one*)

Full name		Address	
Proof of address		Phone	
Date of Birth		Place of Birth	
Nationality		Nature and Place of Business/Occupation (Where applicable)	
Occupational Income (where applicable)		Other (please specify)	

Has the organization conducted Enhanced Due Diligence (EDD) on any donor or volunteer within the last 12 months? YES NO

If YES, please provide the category of members and how many in each category (e.g. foreign members, PEPS)

Who in the NPO is responsible for conducting EDD?

To whom do staff/volunteers refer unusual transactions for approval before they are accepted?

Who ensures that staff/volunteers is/are aware that they must not disclose to any member that they have or intend to report a suspicion to the Compliance Officer (if any) or the Financial Intelligence Unit?

(C) Record Keeping

Describe any system which the NPO has implemented to record and/or monitor transactions?

What system does your NPO use for storing information on donors identification information or transactions? (e.g. electronic or manual) Please provide details.

For how long is the information kept?

(D) Reporting

Briefly describe the systems developed and implemented by your NPO to identify and report transactions suspected to be related to money laundering, financing of terrorism or proliferation financing.

How many cash, donation or gift transactions (receipt or payment) of \$75,000.00 and over were conducted within the last 12 months? (*\$75,000.00 refers to one transaction or two or more transactions together which total \$75,000.00*)

Are the compliance policies and procedures approved by the Board of Directors/Controller/Senior Management?	YES	NO
If YES, what is the approved date?		
How frequently are board meetings held? <i>(Please tick)</i> Weekly Monthly Quarterly Bi-annually Annually		
Are Minutes of Board meetings kept?	YES	NO
NPO AML/CFT Training		
Has your NPO taken the Orientation Training of AML/CFT offered by the Compliance Unit, Office of the Attorney-General? If YES , which of the following sessions were attended?		
TRAINING	ATTENDED?	SESSIONS
FATF Recommendation 8		
Overview of CFATF Mutual Evaluation Findings on The Bahamas		
The Non-Profit Organisations Act, 2019 and its Amendments (Statutory Guidance for existing and new NPOs)		
Compliance with Recommendation 8		
United Nations Security Council Resolutions/Sanctions Lists		
The Anti-Terrorism Act		
The Role of Civil Society		
NPO Risk Assessment		
NPO Compliance Tool Kit		
Who received the NPO Orientation Training? (e.g. controller(s), staff or volunteers of the NPO)		
What other related training have been received by the controller(s), staff or volunteers of the NPO? Please provide date and details of training.		
Date: _____ Name of Controller: _____ Signature: _____		
<small>* Under section 2 of the Non-Profit Organisations Act, 2019 a "controller" means — (a) a trustee of a trust, where the non-profit organisation is established as a trust; (b) a director of a company, where the non-profit organisation is established as a company; (c) a general partner of a partnership, where the non-profit organisation is established as a partnership; (d) a person or slate of officers or trustees responsible for all aspects of management and administration of an unincorporated association, where the non-profit organization is established as an unincorporated association; (e) a member of a corporation, where the non-profit organization is established as an entity incorporated by statute; (f) a founder of a foundation, where the non-profit organization is established as a foundation; or (g) any person not specified in paragraphs (a), (b), (c), (d), (e) or (f) where the non-profit organisation is established by that person;</small>		