

## Improving risk assessment methods for the non-profit sector in Kazakhstan

As part of the [INSPIRES project](#), Flexible Response Funds (FRFs) are designed to provide USAID missions and partners with easily accessible and flexible support in the form of technical assistance and subgrants to local organizations that can help address urgent and emerging threats to civic space.

In **Kazakhstan**, ICNL collaborated with local partner the Institute for National and International Development Initiatives (INIDI) to improve the risk assessment methodology for non-profit organizations in the country. This was done through four key activities:

- Facilitating working group meetings to discuss the risk assessment methodology;
- Leading working to obtain input on the draft methodology;
- Developing the methodology for the risk-oriented assessment of CSOs; and,
- Conducting an information campaign targeting civil society.

Support was provided over the course of 5 months from March - July 2022.

In this summary brief, we share learnings and lessons from key informant interviews and document reviews for these activities.

### Outputs and Outcomes

The FRF activities in Kazakhstan were designed to produce several key outputs, including a draft risk assessment methodology and increased knowledge on issues related to non-profit sector risk.

Based on interviews with key informants who were involved in the program, the Kazakhstan team and

partners achieved several key outputs, as highlighted in Figure 1.

**Figure 1. FRF Outputs**



While ICNL and INIDI faced several challenges in these activities and were not able to achieve all intended outcomes of the FRF, evidence from key informant interviews as well as documentation from partners suggest that the FRF activities contributed to several key outcomes:

**Secured government cooperation and buy-in for process of developing risk assessment methodology.** While ICNL and its partner did not ultimately complete the risk assessment methodology by the end of the FRF timeline, they were able to engage productively with two critical government agencies that were necessary for this work to be successful in the future. Informants

highlighted that this achievement was not guaranteed and that it both improved current relations between civil society and government as well as set up local partners to be able to push forward the risk assessment methodology in the coming months.



*“Without the government’s engagement, it would have been difficult to promote the issue of how Kazakhstan is following Financial Action Task Force legislation if they are leaving out the key civil society body in the government. These bodies ended up buying into the process by the end – they were collaborating with the project.”*

- Key informant interview, January 2023



**Shared information on Financial Action Task Force (FATF) requirements and implications with civil society.** The FRF was able to successfully develop and disseminate materials to civil society in Kazakhstan that introduced why issues of risk assessment of the non-profit sector and other FATF requirements are so critical to non-profit organizations in the country. The information campaign reached different audiences in the sector and shared highly-technical information in a way that CSOs could better understand the need to engage on these issues.

**Established an expert working group.** A key foundation for ultimately developing the risk assessment methodology for the sector is having a group of experts with knowledge of FATF who can engage on the design of the methodology. The FRF activities allowed ICNL and INIDI to both establish the members of this expert working group and to begin getting their inputs on how this work can be taken forward after the FRF ended.

**Helping and Hindering Factors.** Key informants were asked about factors perceived to help or hinder this work. Understanding these factors can help support the implementation of future activities.

**Helping factors** include:

- **Connections between partners and key government bodies:** The activities benefited greatly from existing relationships and engagements between ICNL and INIDI and the government stakeholders from whom they needed to obtain buy-in.
- **Flexible grant and work plan:** Informants noted that they were able to adjust activities based on changing needs and challenges faced during the implementation of the FRF.
- **Prioritization of FATF requirements by the government:** Informants also highlighted that the Government of Kazakhstan has expressed strong interest in meeting FATF requirements, which helped to keep them engaged in this process.

**Hindering factors** include:

- **Short timeline:** The largest challenge cited by informants was the short duration of the FRF activities. Because of the limited time to conduct work, delays caused by slow response from government stakeholders made it difficult to achieve all intended outcomes.
- **Grant structure:** The administrative and financial set-up of the subgrant to ICNL’s partner presented challenges in adapting and finalizing project deliverables.
- **Challenging context for civil society in Kazakhstan:** While the partners were able to secure buy-in from some government bodies, many stakeholders remain suspicious of CSO activity, making it difficult to get buy-in from all critical parties.

For more information about this FRF, please contact: [info@inspiresconsortium.org](mailto:info@inspiresconsortium.org).



Internews



PARTNERSGLOBAL  
Together for Democratic Change



RESULTS FOR  
DEVELOPMENT



ICNL  
INTERNATIONAL CENTER  
FOR NOT-FOR-PROFIT LAW



DEVLAB  
@ Duke



CIVICUS



ZINC  
NETWORK