



## Sangeeta Goswami

Sangeeta Goswami is Policy Advocacy Adviser at [Human Security Collective](#) (HSC), a nonprofit organization (NPO) based in The Netherlands. HSC works on ensuring a free and fully-enabled operating environment for NPOs worldwide. Impediments to this environment come from many fronts, including the AML/CFT frameworks set by bodies like the Financial Action Task Force (FATF). To that end, HSC co-founded and currently co-chairs the [Global NPO Coalition on FATF](#), a network of 450 NPOs worldwide. The Coalition advocates for the effective, risk-based implementation of financial integrity standards in order to mitigate the unintended consequences of their implementation, one of which is bank de-risking. Work on addressing NPO de-risking takes place at both the normative level through policy change, and at national level through multi-stakeholder dialogue processes. HSC co-convenes (with the Ministry of Finance and the Dutch Banking Association) the Dutch Roundtable on Financial Access for NPOs, which brings together key stakeholders – NPOs, banks, government, the supervisor and the Banking Association – to promote financial inclusion and guarantee NPOs’ important work. A practical solution resulting from the roundtable is [a portal for NPOs](#) to help facilitate onboarding and transfers. A second roundtable coordinated by the Dutch Banking Association and supported by the Central Bank and the Ministry of Finance (of which HSC was also a part) resulted in [Risk-Based Industry Baselines](#) for banks and customers, which provide banks with clear principles for risk-based CDD, and more detailed Sector Baselines for those sectors most impacted by de-risking such as NPOs. The [NPO baseline](#), for example, lays out both risk enhancing and risk mitigating factors for NPO transactions.

Additionally, Sangeeta is a member of the [EU AML/CFT Global Facility’s](#) Senior Advisory Group, on the Steering Group of the [UN CSO Coalition on Human Rights and Counter-Terrorism](#), and a team member of the [Advancing Humanitarianism Through Sanctions Refinement](#) group.