ICNL

Call for Grant Proposals: Malawi

Protecting Civic Space while Countering Money Laundering and Terrorism Financing

The International Center for Not-for-Profit Law (ICNL) is pleased to invite proposals for small grants to support civil society organizations (CSOs) in **Malawi** working to protect civic freedoms and prevent civil society overregulation in state efforts to combat money laundering and terrorism financing. Grants of up to **USD $30,000** are available for projects meeting the criteria discussed below. The activities funded by the grant must be completed by November 30, 2026.

Applications will be accepted on a rolling basis until **February 23, 2026,** or until available funds are depleted. For more details and application instructions, please see below.

Background

Across Africa, civic space continues to face sustained pressure from restrictive laws and security-driven governance approaches. In Malawi, civil society actors confront a complex environment shaped by the broad application of anti-money laundering and terrorism financing (AML/CFT) measures, regulatory and administrative burdens on civil society organizations (CSOs), and the increasing securitization of civic space.

Malawi's efforts to align its legal and regulatory framework to comply with the Financial Action Task Force (FATF) Recommendations that regulate money laundering and terrorist financing have driven this trend of securitization. While strengthening AML/CFT standards is a legitimate state objective, the application of FATF standards in national law has not considered the realities and legitimate risk profiles of CSOs. As a result, CSOs have been subjected to increased scrutiny, burdensome reporting requirements, and elevated risk of sanction or suspension, despite a lack of evidence that the sector poses a significant risk of being abused for money laundering or terrorist financing. In 2025, Malawi concluded the risk assessment for the nonprofit organizations (NPO) Sector, which recognized NPOs to be at low risk of terrorism financing, and issued recommendations that will impact the overall regulation of the NPO sector.

Malawian CSOs recently established a CSO Coalition on FATF, a coordinated platform for civil society to engage with government and other stakeholders on the

implementation of FATF standards as they apply to the non-profit sector. The Coalition includes CSOs with varied mandates and expertise to facilitate knowledge sharing, peer learning, and collective engagement on AML/CFT issues affecting civic space in Malawi. The Coalition provides a platform to document the impacts of AML/CFT measures on the non-profit sector, support constructive evidence-based dialogue with authorities, and advance a risk-based, proportionate approach to AML/CFT regulation that reflect the operating realities of civil society in Malawi.

In this context, ICNL seeks to support the newly established CSO Coalition on FATF to empower CSOs on AML/CFT standards, undertake evidence-based research, conduct advocacy to promote policy reforms, and coordinate engagement with regulatory bodies and other stakeholders on AML/CFT issues affecting civic space in line with international standards. More specifically, ICNL aims to support civil society in Malawi to:

1. Monitor, document, and analyze the impact of AML/CFT measures on civil society's freedom of association in Malawi;
2. Facilitate dialogue between CSOs, government, and other stakeholders on proportionate implementation of AML/CFT regulations; and
3. Strengthen CSOs' technical knowledge of AML/CFT norms and best practices and their application to the sector.

Applicant must be a member of the CSO Coalition on FATF and have demonstrable capacity to coordinate the Coalition's work effectively.

In support of these objectives, applicants may propose a wide range of activities. Illustrative activities include, but are not limited to:

- Research, monitoring, and analysis of the impacts of AML/CFT measures and implementation of anti-money laundering and anti-terrorism laws and related laws like the Non-Governmental Organizations Act on civil society, including documentation of sectoral risks and compliance challenges;
- Facilitating CSO engagement with regulators, or oversight bodies, including the Financial Intelligence Authority, NGO Regulatory Authority (NGORA), the Ministry of Finance and Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), on regulatory and civic space challenges, as well as the operationalization of the NPO Sector Risk Assessment outcomes and recommendations;
- Strengthening the CSO Coalition on FATF to coordinate responses to restrictive new and existing laws, policies, or other measures constraining civic space;

- Training CSOs to understand legal obligations, risk assessment recommendations, self-regulation tools, and develop institutional plans to sustain operations under existing AML/CFT regulations and comply with the risk assessment outcomes;
- Developing toolkits, publicity materials, multimedia, or other campaign materials to raise awareness around AML/CFT-related issues, including the recent NPO risk assessment, and its implications on the sector; or
- Facilitating peer learning activities—such as exchanges between members of the CSO Coalition and regional allies to share strategies for engaging on issues of AML/CFT and civic space.

Application Instructions

To apply for a grant, applicants must submit the following items **in English**:

- Proposal (see below)
- Line-item budget (no more than $30,000 USD) **using provided template** (if unable to access, please email africa@icnl.org for a copy). **N.B:** All budgets should **include** the cost of a **project-specific audit**, which is mandatory.
- Resumes/CVs of staff to be engaged in the project
- Background information about the applicant organization (e.g., website links or informational materials)

Content of Proposal

In *five pages or less*, please describe your proposal. The proposal should address the following topics:

- The AML/CFT challenges and opportunities the project seeks to address and their relevance to civic space in Malawi;
- A description of proposed activities, objectives, and anticipated outcomes;
- How the initiative will strengthen civil society engagement on AML/CFT and civic space issues in Malawi;
- How the proposed project will be sustained beyond the end of this grant;
- Applicant's relevant experience and partnerships;
- A clear activity plan and timeline (all activities must be completed by November 30, 2026); and
- Indicators or methods for assessing progress and success.

Eligibility Requirements

Open to any non-profit organization based in Malawi.

Selection Criteria

Applications will be evaluated based on the following factors:

- Compliance with eligibility requirements and application procedures
- Demonstrated commitment to improving civic space
- Quality of proposed project, including proposed methodology/design, and feasibility of the project (e.g., activities are targeted to achieve stated results, and anticipated results are realistic and attainable)
- Likelihood that the proposed project will enhance civic space
- Proposed budget and value for money
- Innovative and forward-looking approaches to civic space promotion and protection, incorporation of digital technology and sustainability
- Inclusion of reasonable indicators to measure project success

How to Apply

Interested applicants can apply by submitting all required documents by email to africa@icnl.org. Please ensure that the subject of your email is "**FATF and Civic Space Proposal – Malawi.**" Applications will be accepted on a rolling basis until **February 23, 2026,** or until available funds are depleted. Please note that ICNL is under no obligation to issue a grant and that only shortlisted candidates will be contacted. Questions about the grant opportunity may also be sent to africa@icnl.org.