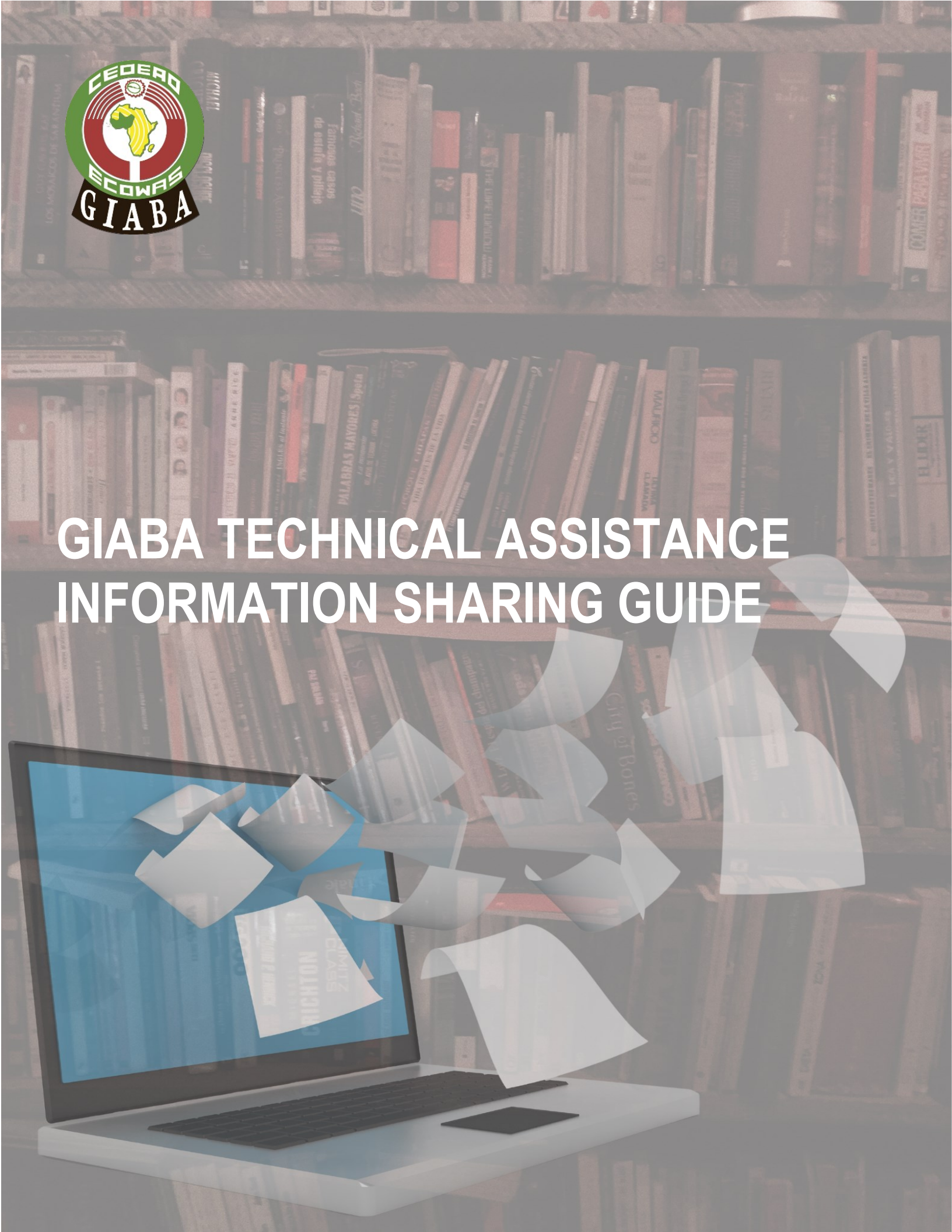
GIABA TECHNICAL ASSISTANCE INFORMATION SHARING GUIDE



The Inter-Governmental Action Group against Money Laundering (GIABA) is a specialized institution of ECOWAS and a FATF Style Regional Body that promotes policies to protect member State's financial systems against money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction. The FATF Recommendations are recognised as the global anti-money laundering (AML) and counter terrorist financing (CTF) standard.

For more information about GIABA, please visit the website: www.giaba.org

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Introduction[1]

1. Information sharing is the deliberate exchange of data, insights, and knowledge between individuals, organizations, or systems to enhance decision-making, coordination, and collective action. In governance, compliance, and development frameworks, it serves as a cornerstone for transparency, accountability, and operational effectiveness. GIABA technical assistance serves as a cornerstone in strengthening its member States to be effective in the delivery of anti-money laundering, countering financing of terrorism, and proliferation financing (AML/CFT/PF) regimes. Sharing of information and technical assistance provides tangible benefits in maximizing synergies between GIABA and stakeholders' respective areas of comparative advantages so as to ensure consistency in policy advice and improve policy traction.

General Principles to Guide Information Sharing

2. There are currently no information-sharing guiding principles for technical assistance at the GIABA Secretariat, and GIABA has witnessed a growing overlap of activities between GIABA and other technical and financial partners. To strengthen collaboration and promote swift, early interventions in high-priority areas of member States, information sharing has become essential to ensure consistency in technical assistance.

3. Technical Assistance information should be shared more widely. The more active sharing of TA information with technical and financial partners (T&FP)[2] will improve coordination, exploit synergies, and enable GIABA to prioritize and leverage its limited TA resources. Additionally, it would be advantageous to T&FP accountability on effectiveness to their governments and legislators, to receive information on TA that is financed by them. TA recipient countries will benefit from the wider dissemination of TA information among different government agencies will strengthen ownership and facilitate the more effective implementation of TA recommendations. Moreover, through publication, the general public at large will benefit from a better understanding of best practices, and the GIABA's experiences in the provision of TA.

4. A hindrance to information sharing is affected by the level of security classification placed on information within each MS and T&FP[3], at GIABA the related classification exists:

- For information classified as "Official Use Only": Sharing of GIABA information with member states and T&FP depends on whether the disclosure is in the interest of GIABA and the receiving party is notified that the information disclosed may not be further disclosed without prior consent of the disclosing GIABA entity or is under an obligation of confidentiality. This permits discretion by concerned GIABA staff to arrive at a judgment as to whether a broadly similar standard is met.
- For Information classified as Confidential or Strictly Confidential: Such classifications are used for information that are sensitive and access to which is confined to those with need (or strict need) to know. Sharing of such information is also subject to the above with the added

[1] This memorandum draws on observation of GIABA technical assistance procedures with staff and from the IMF and World Bank information sharing strategy. This memorandum is limited to interactions between GIABA, member States, and its observers and technical and financial partners.

[2] Technical and Financial Partners includes observers, donors, and other TA providers.

[3] The MS and T&FP have broadly similar classification systems, with information falling into one of four categories: "available to the public", "Official Use Only", "Confidential", and "Strictly Confidential". The recipient institution is expected to treat the transmitted information in accordance with the security classification assigned by the producing institution.

restrictions that the owner of the information in GIABA needs to explicitly give consent and that the information is handled with the same (or higher) security classification within the other institution. The specific handling of the material are expected to be reached on a case-by-case approach.

5. In practice, information-sharing also depends on the provider's understanding of and confidence in how that information will be used/shared within the other institution. Without clear understandings on use/dissemination, staff's assessment as to what constitutes prudent use in the interest of the institution becomes a function of personal familiarity with/trust in counterparts in the other institution. Hence, that information-sharing and collaboration between the two institutions depend significantly on the quality of personal relations between individuals/teams should not be a surprise.

6. Against this backdrop, the quality of GIABA information-sharing can be improved as follows:

- Clarifying/publicizing the ground rules under which information can be shared with counterparts in other institutions and on how that information is handled in the recipient institution. Staff awareness of the existing rules is often poor, with risk aversion discouraging staff from sharing information.
- Specifying good practices regarding interactions between staffs/teams that ensure appropriate information-sharing in line with the principles laid out in this memorandum, and reduce reliability on familiarity.
- Agreeing on escalation mechanisms when issues arise with information sharing (e.g., different views between individual staff or individual teams between the two institutions on the need for particular information or situations where sensitive information provided by one institution to the other are not handled appropriately by the latter).

Scope of Information Sharing

7. The guidelines apply to the dissemination within and outside GIABA of all TA information (excluding the ones covered under paragraphs 9 and 10). In particular:

- The following non-exhaustive categories of TA information are subject to the guidelines:
    a) The fact of the provision of TA and the subject matter of TA.
    b) Information on the administration of TA projects (such as details regarding the project framework, monitoring and evaluation, holistic budget, funding source, and timing of missions)
    c) Information received or generated by GIABA staff, that forms the basis of GIABA TA concept note, mission report[4].
    d) GIABA Mission Report as security classified[5]. This report consists of final TA recommendations conveyed by GIABA staff to the recipient of TA in the form of a TA reports, other final documents such as finalized communique, final aide-memoirs, e-mails, or orally.

[4] The term « information forming the basis of TA mission concept note, mission report includes not only information received by GIABA staff from the TA recipient or third parties that is used as a basis for staff's analysis, but also all information produced or generated by GIABA staff in the process of providing TA to a TA recipient, including drafts of the TA concept note prepared by GIABA before the final TA mission report is provided.

[5] Final Mission report as security classified means the output of the TA provided by GIABA at the request of a TA recipient once it has been completed and includes the security level classification

8. The guidelines will apply to the dissemination of TA information to the following non-exhaustive list of recipients:

a) The TA recipient[6] and other agencies or AML/CFT/PF stakeholders within the member country, non-member or international agency to which fund AML/CFT/PF TA is provided.
b) T&FP and other TA providers. Technical and Financial partners includes any official bilateral or multilateral agency or instrumentality of the public sector that provides grants or concessional financing for TA. T&FP also includes parties other than the TA recipient and donors to specific TA project, such as regional technical assistance centers or topical trust funds funded through multi-donor subaccounts. Also, the term "other TA provider" means any official bilateral or multilateral agency or instrumentality of the public sector that provides TA.
c) ECOWAS Commission and its Institutions, Executive Directors and members of their staff.
d) GIABA Staff, and
e) The general public

9. The guidelines do NOT apply to the following types of TA-related information:

a) **MER Reports**. The guidelines do not apply to the dissemination of information derived from the conduct of the mutual evaluation process, a form of technical assistance, since the handling of such information is subject to the GIABA Process and Procedures and the Universal Process and Procedures.
b) **Typologies and Other Research**. The guidelines do not apply to confidential reports received on the course of conducting a typology exercise or other research, since these reports contain sensitive and confidential information, as agreed by management and participatory member state institutions.

10. The guidelines do NOT apply to the dissemination of TA information that GIABA governs established communication strategy and open archives policies.

a) **Communication Strategy**. The communication strategy governs the routine transmittal (i.e., on a regular basis) of certain types of reports (including TA reports) to the public.
b) **Open Archives Policy**: Reports over 20 years old are available to outside persons upon request, provided the reports originally classified "Strictly Confidential" may not be released if the Director-General finds that the material remains highly confidential or sensitive.

Procedures Governing Dissemination of TA Information

11. The principle underlying the dissemination of TA information is that dissemination requires the consent of both GIABA management and the TA recipient. With respect to permission from GIABA management, this authority has generally been delegated to the head of the TA directorate that authorized it. With regard to consent from the TA recipient, in some instances, this consent may be obtained on a non-

[6] « TA Recipient » means the governmental or inter-governmental agency or instrumentality that is the direct recipient of GIABA TA within member countries, non-members and international agencies. Non-members and international agencies are included in this definition since GIABA may provide TA to them.

objection basis or may be assumed given the subject of the information. Further, in line with the above principle, in scenarios not specifically envisaged in these guidelines, such as dissemination short of publication to private-sector parties, dissemination may be authorized to specific parties with the explicit consent of the TA recipient and the approval of GIABA management[7] The dissemination of confidential information may only take place with the explicit commitment of the recipients that such information shall be kept confidential. Where information has been received from a third party, the explicit consent of such party will also be required prior to the dissemination of the relevant information.

Information related to the Fact of TA Provision and Subject-Matter of TA

12. The fact of provision of GIABA TA in response to a particular TA request and the general subject matter of that TA is not considered confidential information, unless the TA recipient indicates explicitly otherwise at the time of the request for TA.

- Information in this category would thus ordinarily be made available to GIABA staff. In addition, and upon request[8], this type of information may be made available to TA providers and T&FP. The information may also be made available to the general public.
- In those cases, expected to be rare, where the TA recipient explicitly advises GIABA staff that it does not want such information to be made available, particularly to the general public, the TA recipient's wishes shall be respected.

Information related to the Administration of TA Projects

13. Information dealing with the administration of a TA project is not considered confidential, unless the TA recipient specifically indicates otherwise at the time of the request for TA.

- Since this type of information is not considered confidential unless so specified, it may be shared with GIABA staff upon their request. In any event, the results of TA evaluations will continue to be reported on an annual basis under the GIABA's TA Evaluation Program.
- In particular, given the high demand for this information and its importance for coordination among T&FPs, this information would be made readily available to other TA providers and donors upon their request. This information may also be made available to the general public.
- However, GIABA staff would not disclose information about third parties (i.e., parties other than the TA recipient and GIABA), including donors who are funding TA projects, that such third parties would normally regard as confidential (e.g., information on the terms of employment of a TA expert).

Information forming the Basis of TA Mission Reports/Advice

14. Information provided by GIABA staff by a TA recipient or a third party, or that is generated by GIABA staff in the context of the provision or conclusion of a TA, constitutes information that forms the basis of TA mission reports/advice.

- Within this category there are two different types of information:

[7] In determining whether to provide consent to dissemination of TA information in a scenario not explicitly envisaged in these guidelines, management should take into account, inter alia, the impact of disclosure on the TA project, whether disclosure presents any reputational risks for GIABA, and whether disclosure furthers the underlying objectives of the TA being provided

[8] request, as defined in this document, can be made orally, in writing, or by electronic means, i.e., a click on a GIABA secured website.

a) Information provided by the TA recipient or third parties in the context of the provision of GIABA TA; and
b) Information generated by GIABA staff in the course of provision of TA before the TA mission report is finalized.

- Information forming the basis of TA mission report/advice is presumed confidential and shall only be made available beyond GIABA staff, management and the TA recipient in certain circumstances where such sharing is considered necessary to facilitate coordination with donors and other TA providers and to exploit synergies.
- Specifically, the head of the authoring TA directorate, in consultation with the program officer, may consent to the dissemination of the information referred to in (a) and (b) above, upon request from T&FP, donors or other TA providers with legitimate interests, when the TA recipient has also explicitly consented to such dissemination. Where information has been received from a third party, the third party 's explicit consent will also be required prior to the dissemination of the relevant information.
- In determining whether to consent to the dissemination of information referred to in (a) and (b) above, the GIABA director of the authoring Directorate will take into account the following considerations:
    - The likelihood that sharing of such information outside of staff, management and the TA recipient could undermine GIABA's ability to obtain all necessary data and information from country authorities and third parties.
    - The impact that the disclosure of such information might have on the candor of discussions during a TA project's execution, whether they be in the form of exchanges with country authorities and third parties or internal deliberations among GIABA staff.

- This information will generally not be published.

Final TA Mission Report/Advice

15. Final TA Mission Report/Advice is considered confidential information, and its dissemination requires the consent of the TA recipient. Final TA mission report/advice may take the form of: (i) TA reports, (ii) other documents containing finalized GIABA staff advice, including draft reports or final aide-mémoires prepared by GIABA staff, and (iii) final advice provided by GIABA staff to a TA recipient through emails or orally.

- As "TA Reports" are the main form of delivering final TA reports/advice to TA recipients, Section IV below describes specific procedures for the dissemination of TA reports within and outside GIABA. All TA reports shall include a disclaimer summarizing GIABA's policy for the dissemination of this type of information according to the guidelines as set forth in Appendix B.
- Guidelines for the dissemination of final TA mission reports other than TA reports are also outlines in Section IV below.

Specific Procedures for Dissemination of Final TA Mission Reports/Advice

16. The following procedures govern dissemination of Final TA Mission Reports/Advice to GIABA staff:

a) Specific rules for dissemination of TA mission reports to GIABA staff:

- Authoring TA departments are required to ensure that all finalized TA reports, except those classified as "STRICTLY CONFIDENTIAL" and ME reports, are forwarded to the Institutional Documentation Repository.
- Of the TA reports that are forwarded to the Institutional Documentation Repository, those that are classified "FOR OFFICIAL USE ONLY" are accessible to all staff, while TA reports classified "CONFIDENTIAL" are accessible to a smaller group of staff, as determined (i.e., access on a need-to-know basis). The authoring TA directorate is responsible for making determinations on what constitutes need to know on a case-by-case basis. In making this determination the authoring TA directorate should take into account the express or implied understandings reached with the TA recipient, as well as the surrounding circumstances, including the nature of the information contained in the TA report.
- TA reports classified as "CONFIDENTIAL" are reclassified automatically "FOR OFFICIAL USE ONLY" after two years, unless the authoring TA directorate or the relevant area department considers that the sensitivity of the information has not sufficiently diminished.

b) Dissemination of other types of final TA advice to GIABA staff
   - Any form of final TA mission reports/advice may be disseminated to GIABA staff in accordance with the classification of the document.

Dissemination of Final TA Mission Reports/Advice, including reports, outside GIABA

17. Dissemination of final TA Mission Reports/Advice beyond the TA recipient, but within the member State, non-member or international agency that has requested GIABA TA, as the case may be, is subject to the following rules:

- The duty of confidentiality is owed to the TA recipient, which is understood to be the direct recipient of the technical services provided by GIABA staff. Direct TA recipient means the specific agency or instrumentality within the member country, non-member or international agency, as the case may be, to whom the TA is directed. Accordingly, final TA advice should be disseminated to the direct TA recipient and should be addressed to the head of that agency or instrumentality.
- GIABA encourages the direct TA recipient to share this information with other agencies or instrumentalities of the member country, non-member, or international agency, as the case maybe. In addition, GIABA staff may share final TA advice with other agencies or instrumentalities of the member country, non-member, or international agency, as the case may be, with the consent of the direct TA recipient. For these purposes, the consent of the direct TA recipient shall be obtained on a non-objection basis. Consent will be deemed given if the direct TA recipient does not object within 60 days.

18. Dissemination of final TA mission report/advice, including TA reports, to donors and TA providers is governed as outlined below:

- With the consent of the TA recipient, final TA advice may be shared with donors and other TA providers with legitimate interest, upon their request. For these purposes, the consent of the TA recipient shall be obtained on a no-objection basis.
- The authoring TA Directorate in consultation with the relevant area department must determine that the donor or TA provider has a legitimate interest in the final TA advice in question. For purposes of developing specific guidelines on this matter to its own staff, the head of a TA department should take into account that parties with a "legitimate interest" in receiving a copy

of the written version of the final TA mission report/advice include: (a) a donor who is financing, fully or partially, a TA project out of which the requested report has been produced; and (b) a donor or TA provider engaging in related activities in the recipient country in the subject of the TA mission report/advice.

- The dissemination of final TA mission report/advice to donors and other TA providers with legitimate interest may only take place on the understanding with these recipients that such information shall be kept confidential.
- Some donors and TA providers require, as a condition for their funding a GIABA TA project, that TA reports produced in connection with that project be shared with them. In this case, the coordinating Directorate in GIABA would disseminate the TA mission report/advice to donors and TA providers with legitimate interest, upon their request.

19. The rules for dissemination of final TA mission report/advice, including TA reports, to the general public (i.e., publication) are set forth below.

- All types of final TA mission report/advice may be published, and GIABA specifically encourages the publication of TA reports. Accordingly, staff should proactively encourage TA recipients to agree to publication of TA reports by GIABA. Staff should also encourage TA recipients to publish GIABA TA reports on their own websites.
- Publication by GIABA of any final TA mission report/advice requires the consent of the TA recipient and the approval of head of the authoring TA department[9]. As noted earlier, the TA recipient may withdraw its consent to publication at any time prior to publication.
- Publication by the TA recipient of any final TA mission report/advice on its own website or in another form should be undertaken soon after the publication by GIABA.
- In line with current practice, when a TA mission report or any other type of final TA advice is to be published, prior to its publication by GIABA or the TA recipient, the TA report or other type of final TA advice should be circulated to management for its information in the form in which it is to be published (i.e., after any deletions or corrections, as discussed below, have been made).
- Prior to the publication of a TA mission report or any other type of final TA advice, sensitive information may be removed from the document. In addition, factual corrections and corrections required to ensure that the views of the TA recipient and GIABA staff are accurately characterized in the document may also be introduced. In particular, the following rules shall apply:

(a) Deletions

- Prior to publication, deletions may be proposed to management by the TA recipient, provided the relevant material is not already in the public domain and qualifies as: (i) highly-market sensitive information; or (ii) policy intentions whose premature disclosure would seriously undermine the ability of the TA recipient to implement the proposed policy.
- When deletions are proposed, staff of the authoring TA department will provide staff of other relevant directorate, the opportunity to review and comment on the proposal.

[9] It is GIABA practice that when TA mission reports (which are a form of final TA advice) are published, such documents are circulated to management for information prior to their publication. Approval for such circulation has been delegated by management to heads of directorate authoring TA mission reports. Such delegation does not preclude authoring departments from flagging any relevant issues to management in advance of circulation.

- Following the inter-directorate review process noted above and in light of the recommendations made by staff, management will make the decisions on the proposed deletions, and may take into consideration other factors in addition to the criteria mentioned above.
- Before a TA report or other type of final TA advice is published, the following shall be removed from the document: (i) references to unpublished GIABA documents, and (ii) certain internal processes that are not disclosed to the public under existing policies, including inquiries regarding possible misreporting and breaches of members' obligations.

(b) Corrections

- Corrections may be proposed to resolve: (i) data or typographical errors; (ii) factual mistakes; and (iii) mischaracterization of views expressed by either the TA recipient or by GIABA staff from directorates in the context of the internal review process.
- When corrections are proposed, staff of the authoring TA directorate will provide staff of other relevant directorates with the opportunity to review and comment on the proposal.

(c) Management's objection to publication

- In order to maintain the intellectual integrity of GIABA's TA advice, and to preserve the substantive thrust of recommendations made in any TA report or other type of final TA advice, management may withhold its consent to the publication of such document if management disagrees with the deletions or corrections proposed by the TA recipient.

Implementation of the Guidelines

A. General Issues

20. TA-providing directorate shall be responsible for the implementation of the procedures specified in the guidelines.

21. In implementing these guidelines, directorate should keep in mind the broader context from which these procedures flow, i.e., that, as a general legal principle, GIABA management and staff may not disclose information that a member or other party has provided to them in confidence, unless that party consents to such disclosure. A determination that particular information has been provided in confidence is based upon an examination of all the surrounding circumstances, including the nature of the information provided; at issue is the question whether there was an understanding between staff and the other party that such information would not be disclosed without that other party's consent. This understanding can be express or implied.

B. Reference to Guidelines Upon Requests for TA

22. Whenever staff discuss the possibility of TA, it would be desirable that the guidelines be highlighted to the potential TA recipient. In any case, upon receiving a request for TA, staff should ensure that the TA recipient is made aware of the existence and general content of these guidelines. In this regard, in responding affirmatively to a request for GIABA TA, staff may wish either to attach a copy of the guidelines or include a link to GIABA's website in the response, underscoring that in certain cases, final TA advice may be shared

within and outside GIABA in accordance with the procedures set forth in these guidelines. This is particularly important in cases in which the request for GIABA TA comes from a non-member or an international agency that may not be appraised of the content of these guidelines in the same way as member countries are. Further reminders to the TA recipient of the existence and content of the guidelines should be provided at the start and end of TA missions, and in documents transmitting final TA advice.

C. Categorization of TA Information and Recipients of TA Information

23. Upon receiving a request to disseminate particular TA information, staff should categorize the requested TA information according to the categories of TA information listed in paragraph 7 above. To the extent that particular TA information is difficult to fit within any of the listed categories, resulting in lack of clarity as to how the information should be treated under the guidelines, staff should consult management for further guidance.

24. On occasion, staff may be faced with requests for TA dissemination from external parties other than the most common possibilities listed in paragraph 7 above. These may include academics and researchers, nongovernmental organizations and private sector entities providing technical assistance, or various entities in civil society. If staff is unsure of how to handle such requests, management should be consulted.

D. Coming into Force of Guidelines

25. These guidelines become in effect on November 21, 2025.

Appendix A: Dissemination of TA Information to Recipients

Category of TA Information		Dissemination of TA Information to Recipients					
		Inside GIABA		Outside of GIABA			
		GIABA Staff	**GIABA Management**	**Direct TA Recipient**	**FATF / ECOWAS**	**T&FP, Donors and Other TA Providers[10]**	**General Public (Publication)**
1	The fact of and subject-matter of TA	Available	Available in Staff Reports	Available	Ordinarily available	Ordinarily available	May be made publicly available
2	Information Related to the Administration of TA	Available	Available (results of TA evaluations available annually)	Available	Ordinarily available[11]	Ordinarily available	May be made publicly available
3	Information forming the Basis of TA Mission Report / Advice (Considered confidential and generally not made available beyond GIABA staff)	Available	Available	Available except for confidential information internally generated by GIABA Staff or provided by 3rd Parties. In the latter case, available if third party consents	For coordination purposes and to exploit synergies, may be made available[3] with (i) the prior consent of the TA recipient (and the prior consent of a third party if the latter provided information on a confidential basis) and (ii) the approval of TA authoring department	For coordination purposes and to exploit synergies, may be made available[3] with (i) the prior consent of the TA recipient (and the prior consent of a third party if the latter provided information on a confidential basis) and (ii) the approval of TA authoring department	Generally not made publicly available
4	Final TA Mission Report / Advice (Considered confidential and may be made available)	Available	Available	Available. (staff should encourage the TA recipient to share this information with other agencies or instrumentalities within the TA recipient) With direct TA recipient's consent GIABA staff may share final TA advice with other agencies or instrumentalities of the member country, non member, or international agency, as the case may be, on a non-objection basis.	Final TA mission report / advice provided to members, non members, and international agencies	Available	Staff should proactively encourage TA recipient to explicitly consent to publication on its own website and/or on GIABA's external websites, pending approval by the authoring TA department Publication subject to special policy on **deletions** and **corrections** prior to publication.

[10] The term "donor" includes, members of a Steering Committee, such as for regional technical assistance funded through multi-donor accounts. The term "other TA provider" means any official bilateral or multilateral agency of instrumentality of the public sector that provides TA.
[11] Upon request made orally, in writing, or by electronic means, i.e. a click on a secured website