



## **ASSESSMENT OF THE RISK THAT NON-PROFIT ORGANISATIONS COULD FINANCE TERRORISM**

Den sentrale enhet

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### 1. SUMMARY

- PST has been tasked by the Ministry of Justice and Public Security to prepare an assessment of the risk that the voluntary sector could be used to finance terrorism.
- Much of the control of the voluntary sector is optional, and there is a connection between the extent to which a voluntary organisation is registered, which incentive schemes it has and how well it is controlled. This constitutes a vulnerability, and the non-profit organisations that are somewhat reluctant to register, are the ones that pose the biggest risk.
- Fundraising is allowed without registering, and the donors' cautiousness is thus important.
- Parts of the finance business have prepared routines and control points to reveal abuse of the volunteer regime, in cases where the non-profit organisations act as payment service providers. The finance business has to some extent closed their customer relations with these organisations.
- Media's mention of financing of terrorism has made the donors more observant and inclined to check the background for the fundraising. We can say that there has been a general awakening among the donors.

- The Ministry of Foreign Affairs will make a risk classification of Norwegian foreign aid and administration of subventions.

## 2. INTRODUCTION

This report is an analysis of the risk that non-profit organisations could be abused to finance terrorism.

As a starting point, we will provide an insight into this important sector in Norway, to get an overview of its diversity. Subsequently, we will present the registration schemes for this type of organisations and the incentives the authorities have prepared.

We will also say something about which vulnerabilities certain types of organisations have and make a risk classification of these.

Private fundraising will also be mentioned.

PST has been tasked by the Ministry of Justice and Public Order to prepare this report. This task is according to the Financial Action Task Force's (FATF) recommendation number 8<sup>1</sup>, which instructs member countries to implement a number of measures to prevent financing of terrorism through so-called Non-Profit Organisations (NPOs).

One of the measures is to assess which NPOs that are exposed to risk. This concerns both organisations that intend to support terrorists or terrorist groups, as well as legitimate NPOs that are vulnerable to abuse.

A follow-up point concerning financing of terrorism and NPOs has been included in measure 13 of the government's strategy against money laundering and financing of terrorism.

Link to FATF's «Best Practices on Combating the Abuse of Non-Profit Organisations»:

<http://www.fatf-gafi.org/publications/fatfrecommendations/documents/bpp-combating-abuse-npo.html>

<http://fatfplatform.org/special-recommendation-8/>

## 3. RISK THAT NON-PROFIT ORGANISATIONS COULD FINANCE TERRORISM

In the National Risk Assessment 2018, Money laundering and financing of terrorism in Norway (NRA2018), which is published by the Ministry of Justice and Public Security, it is stated:

«Every year, non-profit organisations send a considerable amount of money out of the country, for the purpose of supporting charitable activities. Sometimes, the donor could be lured into believing that the money is intended for humanitarian purposes, whereas in reality, it is used to finance criminal activity».

When this report mentions financing of terrorism, it refers to money that is collected in Norway and sent out of the country to extreme Islamist individuals and organisations.

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<sup>1</sup> FATF's recommendation no. 8: «Countries should review the adequacy of laws and regulations that relate to non-profit organisations which the country has identified as being vulnerable to terrorist financing abuse. Countries should apply focused and proportionate measures, in line with the risk-based approach, to such non-profit organisations to protect them from terrorist financing abuse, including: a) by terrorist organisations posing as legitimate entities; (b) by exploiting legitimate entities as conduits for terrorist financing, including for the purpose of escaping asset-freezing measures; and (c) by concealing or obscuring the clandestine diversion of funds intended for legitimate purposes to terrorist organisations.

Both Norwegian and international experience shows that such money transfers in certain cases have come to organisations affiliated with terrorism. In order to be able to assess whether the voluntary sector risks financing terrorism, we have to gather knowledge about how the different types of NPOs are registered, financed and operated.

In PST's annual unclassified threat assessments from the period 2012-2016, fundraising for the benefit of Norwegian foreign fighters and international terrorist and insurgent groups is mentioned. Please note that PST here refers to collection of money, without concretising whether or not the collection has been made by NPOs.

Compared to the period 2013-15, the extreme Islamist milieu in Norway is presently weakened and not very organised. Individuals can nevertheless initiate fundraising campaigns both for Norwegian-affiliated foreign fighters and international terrorist organisations. In Norway, certain individuals have been sentenced for having supported terrorism, not via an NPO, but on a private initiative, often in a closed Islamist milieu.

As concerns trends in Europe, we refer to EUROPOL's report «European Union Terrorism situation and Trend Report 2018» (TESAT 2018):

«Diaspora communities living in the EU play a significant role in financing and procurement activities for conflicts in their countries of origin. There is a high potential for mobilization with regard to fundraising among jihadist sympathisers. In most cases, the calls for donations are made in mosques, via websites and web fora. Non-profit organisations (NPO) may be used for money laundering and terrorism financing under the umbrella of humanitarian activities.»

Link to National Risk Assessment 2018: <https://www.regjeringen.no/contentassets/58f96ea9756d4457be3095609624d96d/nasjonalt-riskikovurdering.pdf>

Link to PST's Annual Threat Assessment 2018: <https://www.pst.no/trusselvurdering-2018/>

Link to European Union Terrorism Situation and Trend Report 2018: <https://www.europol.europa.eu/activities-services/main-reports/european-union-terrorism-situation-and-trend-report-2018-tesat-2018>

## 4. NON-PROFIT ORGANISATIONS IN NORWAY

The activity of the NPOs covers a wide range of areas, and these organisations contribute to carrying out important tasks in the welfare society.

Norwegian NPOs have around 9.2 million memberships, and there are approximately 100 000 clubs and associations in Norway. Included in this figure are clubs and associations that are part of a national organisation. According to Statistics Norway, the added value of NPOs is estimated at 132 billion NOK per year.

Sources of income for NPOs are given in percentage as part of the total financing in 2016. Funds for investments and activities abroad are not included.

State	27,3%
Municipalities and county administration	16,1%

Households	43,9%
Other sources of income	12,8%

About 75% of the funds from the state and municipality went to enterprises offering welfare services. The state funds are primarily aimed at health and education, whereas the contributions of the municipality to a great extent is aimed at caring services. Households are the most important source of income for several of the categories, but nearly half of the household contributions went to organisations involved in cultural and leisure activities and the local environment. The funds from trade and industry mainly went to branch and trade unions as well as education and research establishments.

*"Frivillighet Norge" (The Association of NGOs in Norway) defines a voluntary organisation as an association of people or activities operating on a non-commercial and non-government basis. This is a broader interpretation than the one FATF uses, as FATF defines an NPO as an organisation that primarily collects money for "good works".<sup>2</sup>*

The organisations may have different kinds of idealistic purposes such as environmental issues, human rights, promotion of faith and philosophy of life, public health work, social or cultural purposes, preparedness work, sports, outdoor life, solidarity, foreign aid etc.

Most NPOs in Norway are member-based associations. Some organisations are however organised as foundations, which are not member-based.

NPOs are independent and operated according to their own by-laws and statutes. Norwegian legislation does not apply to the establishment and administration of NPOs, but if an organisation is a house owner, employer, has a VAT-required turnover or similar, it has to respect Norwegian legislation in these fields.

Link to Statistics Norway's Satellite account for non-profit institutions: <https://www.ssb.no/nasjonalregnskap-og-konjunkturer/statistikker/orgsat/aar>

## 5. IMPORTANT ACTORS

### RESEARCH AND IDENTIFICATION

Centre for Research on Civil Society and Voluntary Sector is a joint project between The Institute for Social Research and Uni Research Rokkan centre. Since its establishment in 2008, this centre has aimed at conducting professionally independent and socially relevant research on voluntary engagement and NPOs in Norway. The centre makes research and communicates research-based knowledge to decision-makers, other researchers and the general public.

Link to Centre for Research on Civil Society and Voluntary Sector: <https://www.samfunnsforskning.no/sivilsamfunn/>

### ASSOCIATION OF NGOs IN NORWAY

The association of NGOs in Norway consists of more than 300 member associations, from all types of voluntary work, ranging from huge humanitarian organisations focusing on fundraising activities, to smaller organisations working with poverty-related questions, heavy actors in the

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<sup>2</sup> FATF's definition of an NPO: *A legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, or for the carrying out of other types of « good works ».*

health and social field, major parts of Norwegian cultural life, sports and a magnitude of religious communities. Altogether, the association of NGOs in Norway represents several million individual members and more than 60 000 clubs and associations all over the country.

The association of NGOs in Norway is among other things working to improve the knowledge of how to administer voluntary work and to promote the dialogue between the voluntary, public and private sector.

The association of NGOs in Norway also publishes a manual on how to start, register and run an NPO, and describes both the laws, regulations and common practice of Norwegian NPOs. This book is freely available on their homepage. The association inter alia holds courses on economic fraud and on how NPOs should be prepared to handle and prevent it.

Link to The association of NGOs in Norway: <http://www.frivillighetnorge.no/>

### **THE NORWEGIAN CONTROL COMMITTEE FOR FUNDRAISING**

The Norwegian control committee for fundraising (IK) was established in 1991 and has published two lists on its webpage to inform the donors.

List of approved organisations: the organisations on this list have applied for approval and have accepted the control requirements, to use a Norwegian auditor, and to use the Norwegian accounting standard for NPOs. The organisation must fulfil the requirement of collecting 65% over a period of maximum five years. It is stamp of quality to be on the approved list, and it is often required by organisers of major fundraising campaigns (such as the annual TV-campaign) and by donors in general.

The warning list: contains organisations that the control committee finds reason to warn against. The background for becoming included on this list, could for instance be violation of ethical fundraising guidelines in Norway, too low collection percentage, or lack of transparency about the organisation's collection and administration. The list is often referred to in media.

Link to the Norwegian Control Committee for Fundraising: <http://www.innsamlingskontrollen.no/nb/>

### **THE NORWEGIAN GAMING AND FOUNDATION AUTHORITY**

The Norwegian Gaming and Foundation Authority is a public authority reporting to the Ministry of Culture. The Gaming Authority supervises and controls all private and state operated lotteries in Norway. The Gaming Authority is responsible for supervising the National Lottery (Norsk Tipping) and horse gaming (Norsk Rikstoto), in addition to gaming responsibility and control of the market, such as illegal marketing, illegal money games and pyramids.

The Foundation Authority is responsible for supervising and controlling all foundations in Norway. Organisations and foundations under the Gaming and Foundation Authority usually do not collect money, but allocate money for approved "good causes". We therefore do not assess these organisations at risk of becoming involved in financing of terrorism.

Link to The Norwegian Gaming and Foundation Authority: <https://lottstift.no/nb/>

## 6. REGISTRATION SCHEMES, CONTROL AND INCENTIVES

Organisations have to register in the Central Coordinating Register for Legal Entities. It is voluntary to register in the registry of NPOs, but doing so could give associations and organisations advantages, such as:

- Possibility to participate in the Grassroots Share, a scheme enabling players in the National Lottery to donate a certain percentage of the amount they play for directly to an NPO,
- Possibility to apply for VAT compensation, which means that they can apply to be compensated for VAT they have paid when purchasing goods and services.

There may also be public or private subvention schemes that require registration in the registry of NPOs. As an example, you have to be registered in the Central Coordinating Register or the registry of NPOs to be able to open a bank account in the name of the organisation.

It is voluntary to register in the Association of NGOs in Norway and in the Norwegian Control Committee for Fundraising. However, both entities require that the NPO is registered both in the Central Coordinating Register for Legal Entities and in the registry of NPOs before you can register with the first-mentioned entities.

The Association of NGOs in Norway and the Central Coordinating Register for Legal Entities have a membership fee, and this cost is based on the size and turnover of the organisation in question.

Link to the registry on NPOs in Norway: <https://www.brreg.no/lag-og-foreninger/registrering-i-frivillighetsregisteret/>

- Tax deduction scheme:

Donors can get a tax deduction on their taxable income for money donated to certain pre-approved NPOs and religious and life stance communities. Several conditions have to be met to get the tax deduction, and in 2018 the maximum deductible amount is NOK 40 000. The Tax Administration has a list of approved Norwegian organisations available online.

Link to the Norwegian Tax Administration: <https://www.skatteetaten.no/bedrift-og-organisasjon/rapportering-og-bransjer/bransjer-med-egne-regler/frivillige-og-ideelle-organisasjoner/skatt-for/gaver/>

- VAT compensation:

The VAT compensation scheme shall compensate for VAT costs that NPOs have when purchasing certain goods and services. As of 01.01.2019, new regulations have been adopted requiring that an organisation with all subsidiaries (i.e. all local clubs etc.) have to be registered in the registry of NPOs in Norway. The Norwegian Gaming and Foundation Authority supervises and controls this scheme.

Link to information about the VAT deduction scheme:

<https://www.regjeringen.no/no/tema/kultur-idrett-og-frivillighet/frivillighet/innsiktsartikler/momskompensasjon-til-frivillige-organisa/id674455/>

## 7. LEGISLATION

An NPO is regarded as an enterprise pursuant to section 27 of the General Civil Penal Code. The criminal liability clearly instigates the responsible of an NPO to examine the intentions of both those who collect money on behalf of the organisation and of those who receive possible funds from the organisation.

Section 135 of the Penal Code punishes any legal or physical person who illegally provides, receives, sends, procures or raises money or other assets with the intent *or knowledge* that the resources will be wholly or partly used to commit a terrorist act, *or that* the person or group who receive the resources intend to commit terrorist acts *or that* the recipient of the resources is a person acting on behalf of a person or group committing terrorism. This provision also punishes a person or enterprise (legal person) that makes banking or other financial services available to persons one knows or should know intend to commit a terrorist act.

Providing material or financial support to a terrorist organisation, is also regarded as financing of terrorism, cf. section 136a of the Penal Code. Sections 135 and 136a partly overlap.

*With knowledge that* implies that a person can be blamed if he should have understood that the collected funds were collected for or sent to an individual or an organisation that commit terrorism.

## 8. NORWEGIAN FOREIGN AID – via the Ministry of Foreign Affairs and NORAD (The Norwegian Agency for Development Cooperation)

In this report we do not make any general risk analysis of the Norwegian voluntary sector, as Norwegian foreign aid and relief channelled via the Ministry of Foreign Affairs and NORAD is not included. The Ministry of Foreign Affairs (MFA) will make an assessments of its own administration of grants.

To get a good understanding of Norwegian foreign aid and our culture of collecting money for charitable purposes, it could be useful to get an insight into the foreign aid and relief which is channelled through the MFA and NORAD.

MFA and NORAD have for many decades established good cooperating partners, they have routines for following-up tip offs, and they also have an independent control unit and one whistleblowing unit. Relief and foreign aid to conflict areas require tight follow-up and control, and we now see a development where the majority of the funds go through big multilateral relief organisations and the UN, and there is a reduction in the number of recipient nations. This could make it easier to control the funds.

In 2017, Norway gave about 34.1 billion NOK in official foreign aid, corresponding to around 1% (0.99%) of the gross national product (GNP). Syria received the largest amount, and a major part of the aid was given to the least developed countries. Crises and conflicts characterise the foreign aid statistics for 2017, the biggest increase being relief to countries in conflict areas. In 2017, relief amounted to 4.43 billion NOK, corresponding to 13% of the aid.

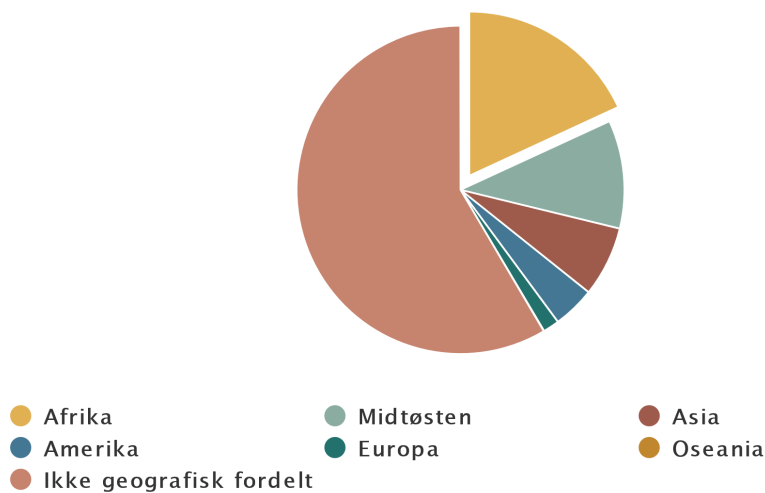


Norwegian foreign aid divided on regions.

### Norsk bistand i 2017 fordelt på region



I bistandsstatistikken er 42 prosent av norsk bistand geografisk fordelt. I det geografisk ufordelte ligger kjernestøtte til multilaterale organisasjoner, administrasjonskostnader og globale fond til blant annet helse og utdanning.



Norad: Norsk bistand i tall

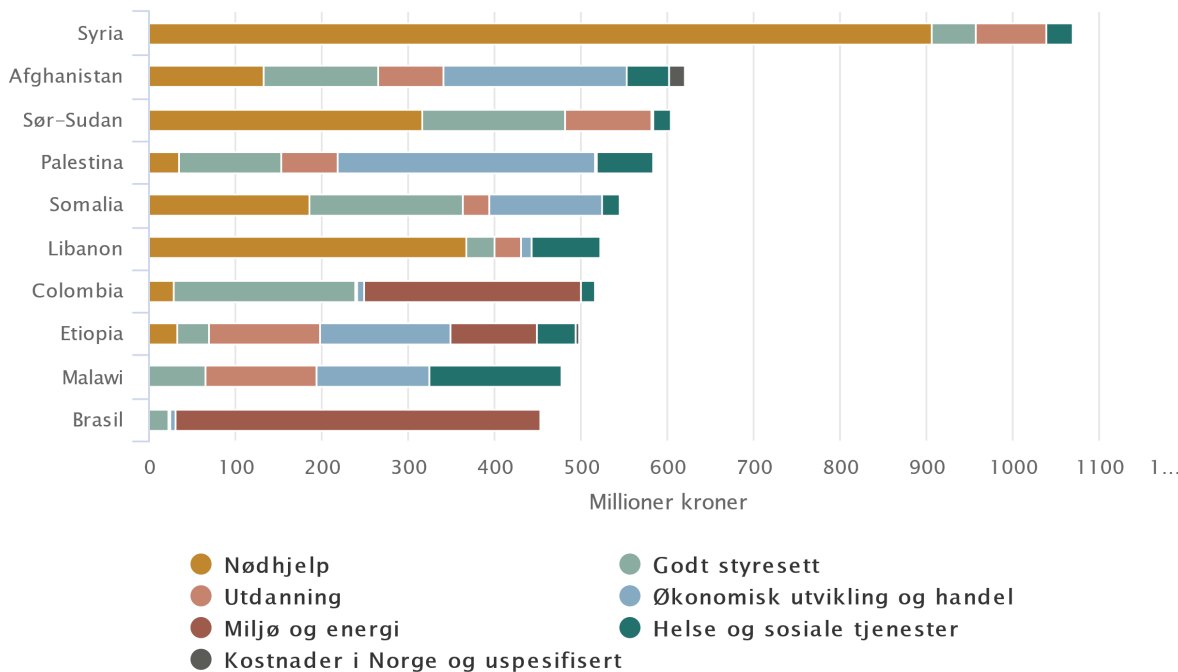
More than half of the relief was given to the Middle East, whereby Syria (907 million NOK), Lebanon (368 million NOK) and Yemen (265 million NOK) were the most important recipient nations. Much relief was also given to Africa, where the nations receiving the most aid were South-Sudan (317 million NOK), Somalia (187 million NOK) and Nigeria (174 million NOK).

The ten biggest recipient countries in 2017, divided in areas of support.

### Ti største mottakerland i 2017, fordelt på temaområde



Syria er største mottakerland også i 2017. Stor nød rammer fortsatt det krigsherjede landet og 85 prosent av støtten til Syria var nødhjelp. Somalia og Colombia er nye land på listen fra i fjor – Irak og Indonesia faller ut av listen.



Norad: Norsk bistand i tall

In 2017, altogether 54% of the foreign aid was channelled through multilateral organisations. 51% of the multilateral foreign aid went to UN organisations, 17% through the World Bank group and 7% to the regional developing banks.

In 2017, foreign aid through Norwegian civil society organisations increased to 5.2 billion NOK. 38% of this support went to relief measures and 28% to strengthen the government of the recipient nations. The major civil society organisations are Norwegian Refugee Council, Norwegian Red Cross, Norwegian Church Aid, Norwegian People's Aid and Save the Children Norway.

## 9. VULNERABILITIES OF DIFFERENT ORGANISATIONS

### CONTROL OF NPOs

NPOs registered in the Norwegian Control Committee for Fundraising and in the Association of NGOs in Norway are subjected to requirements that make economic crime and financing of terrorism difficult. These organisations have also chosen to register and have to meet several reporting requirements.

Both the Association of NGOs in Norway and the Norwegian Control Committee for Fundraising believe that it is hard to finance terrorism with the demands they impose on an organisation. They assume that it is easier to finance terrorism by not registering the organisation. They do not see financing of terrorism as a relevant problem, but emphasize that the sector is

vulnerable to economic crime such as fraud, often committed by individuals who want to enrich themselves.

There are several control elements that contribute to reducing the risk of terrorist financing:

- The accounts and different accounting items of an organisation is open information that has to be approved at annual meetings. The leadership of an NPO is democratically elected and thus depend on the members' confidence.
- An organisation has to submit auditor-approved accounts to the Norwegian Control Committee for Fundraising. The Control Committee can also on its own initiative request information about organisations that are not registered with them, if there is reason to suspect economic crime.
- Many NPOs receive economic support from the government. Thus they become subject to public control, not just for the amount they have received, but for the entire accounts including all items.
- The Norwegian Tax Administration has its own unit that controls the 400 organisations that have a tax deduction scheme for the donors.
- The Gaming and Foundation Authority controls organisations granted VAT compensation.
- Organisations that cooperate with the MFA and NORAD are under strict control and reporting requirements.
- The finance sector can report suspicious transactions to the Unit for financial intelligence at the National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim).

### **PAYMENT SERVICE PROVIDER REGISTERED AS AN NPO**

Norway has experienced that NPOs have operated as illegal payment service providers. These enterprises have neither had a licence from the Financial Supervisory Authority of Norway to conduct money transfers nor an agent agreement with an EEA-registered payment service provider. These companies do not report to the currency register or to the Financial Intelligence Unit (EFE) at Økokrim about suspicious transactions according to the Anti-Money Laundering Act. This makes the original sender and final recipient concealed to the authorities, and such transactions can be used both to launder money and to finance terrorism. This is an abuse of the voluntary scheme.

This modus represents a vulnerability, but it seems to become less frequent. There are two circumstances that contribute to this positive development. The finance sections of the largest Norwegian banks have become more aware of this problem and they have strengthened their own control routines. This has made them close the customer relation with such organisations. It has also become easier to register as a payment service provider at the Financial Supervisory Authority with an agent agreement to an EEA-registered payment service provider.

It is thus essential to stimulate the users of payment service providers to use serious actors in the market.

### **SMALLER ORGANISATIONS**

Smaller organisations, that do not receive any economic support and that are not either registered at the Association of NGOs in Norway or at the Control Committee, therefore stands out as the organisations that are under least control, and thus may constitute a risk.

Small organisations that collect money for projects and relief to conflict areas where terrorism is known and widespread, are thus organisations that represent a high risk. As a donor, it is therefore important to get information about the organisation before donating money.

## 10. «PRIVATE» FUNDRAISING

Fundraising is not regulated by law in Norway. There are not either any requirements of registration or notification. As everyone is allowed to collect money and registration is optional, this voluntary scheme opens for unwanted actors. This means that individuals and closed milieus may collect money without having to establish an organisation.

This type of collection activity requires the donors to be conscious about what they donate money to. Supporting terrorism is nonetheless punishable, regardless of whether the money is collected via an organisation or by an individual.

The Ministry of Justice and Public Security has published a brochure, which has been translated into several languages, to address this issue. The brochure is entitled «Your contribution can be abused».

Link to «Your contribution can be abused»: <https://www.regjeringen.no/no/sub/radikalisering/aktuelt/ditt-bidrag-kan-misbrukes/id712778/>

## 11. RISK CLASSIFICATION

The risk that the voluntary sector is used to finance terrorism, can be assessed as a combination of registration and control on the one hand, and the donors' and society's knowledge and consciousness on the other hand. The list of indicators can be used by donors as well as the finance business.

There are good registration and incentive schemes today that reduce the vulnerability and the risk of financing terrorism via a registered NPO.

Foreign aid channelled through the MFA and NORAD is subject to good control routines. The MFA and NORAD mainly cooperate with big and well-reputed partners, have a widespread presence and networks in conflict areas. Altogether, this reduces the possibility of terrorist financing.

Small organisations that have chosen not to register, and collect money for charitable purposes in conflict areas where terrorist groups are established and cooperate with local unknown organisations in the area, constitute a risk of terrorist financing. In addition, individuals who collect money in secluded environments, also constitute a risk.

The pyramid underneath is an illustration of the different organisations and their level of registration and activity, which again is reflected in a risk that they could finance terrorism.

**Risk groups – level of registration**

At the upper level, with heightened risk, there are small unregistered organisations and private collection initiatives. Downwards in the pyramid, the control mechanisms increase at the same time as the different registration instances increase in number and become more extensive. The risk is reduced the further down you get in the pyramid.

Underneath follows a list of indicators that can reveal financing of terrorism. The list of indicators can be used by control bodies and the finance business.

**Indicators – financing of terrorism in the voluntary sector**

Indikatorliste - Risiko for terrorfinansiering gjennom NPO		
Indikatorer	Ja	Nei
<b>Registrering av NPO</b>		
Er NPO registrert i Frivillighetsregisteret	Green	Red
Er NPO registrert hos Frivillighet Norge eller Innsamlingskontrollen	Green	Red
Har NPO momsfradragssordning og/eller Skattefradragssordning	Green	Red
<b>Drift og innsamling</b>		
Er NPO, ledelse eller kontaktpersoner negativt omtalt i media	Red	Green
Er det kontantuttak fra den norske bankkontoen på de innsamlede midlene	Red	Green
Har NPO drevet innsamling eller veldedig arbeid før med godt resultat	Green	Red
Er det åpenhet rundt disponeringen av de innsamlede midlene	Green	Red
Har NPO tilstedeværelse eller knytning til mottakerlandet	Green	Red
Har innsamlerne tilhørighet til områdene som er målet for innsamlingen	Green	Red
<b>Mottaker</b>		
Er mottakerne for de innsamlede midlene omhandlet negativt i media	Red	Green
Er innsamlingen knyttet til konfliktområder hvor det begås terrorisme	Red	Green
Dersom en saksorientert NPO donerer til urelatert sak	Red	Green
Dersom midler går til konfliktområde, er mottaker en anerkjent motpart	Green	Red
Høy risiko	Red	Green
Lav risiko	Green	Red

The list of indicators show the different types of registrations, which could say something about the degree of external control and the will to submit to it.

As concerns administration and collection, factors such as mention in media and open sources, experience and results from collection activity, can reveal important information. One should also examine, to the extent possible, cultural affiliation, presence in the recipient country and openness to give information about the administration.

One can also examine whether the donors, private individuals and other organisations can be connected to terrorism.

A control point could also be to examine whether the end-user of the collected funds is mentioned in the media in a positive or negative way. If the end-user is in a conflict area, is terrorism committed there?

One should distinguish between general and case-oriented organisations and look for irregularities, such as for instance:

- A case-oriented organisation donates to a non-related case
- A usually focused organisation includes new areas, such as: a relief organisation sends money to an area where there are no urgent needs.