Submit by 2359 GMT on Tuesday 20 February 2018

#### Department for Environment, Food and Rural Affairs

# Application form for Illegal Wildlife Trade Challenge Fund Round 4 - Stage 2

Before completing this form, please read both the Fair Processing Notice on pages 18 and 19 of this form and the Guidance. This is available at <u>GOV.UK</u>. Where no word limits are given, the size of the box is a guide to the amount of information required.

## 1. Name and address of lead organisation

Notification of results will be by email to the Project Leader only

Applicant Organisation Name:	Environmental Investigation Agency (UK) Limited
Address:	
City and Postcode:	
Country:	
Project Leader name:	Julian Newman
Project Leader email:	
Project Leader phone:	

## 2. Stage 1 reference and project title

Stage 1 Ref:	Title (Max 10 words):
382	Deploying Anti-Money Laundering Typologies to Curb Illegal Wildlife Trade

## 3. Project dates and budget summary

Start date: 1 July 2018	End date: 30 June 2020		ate: 1 July End date: 30 June 2020 Duration: 24 months		nths
2018/19 £ 131,536	2019/20 £ 174,618				•
Proposed (confirmed and unconfirmed) co-financing as % of total Project cost					

## 4. Summary of Project

Please provide a brief summary of your project, its aims, and the key activities you plan on undertaking. Please note that if you are successful, this wording may be used by Defra in communications e.g. as a short description of the project on GOV.UK. Please bear this in mind, and write this summary for a non-technical audience.

#### (Max 80 words)

Office use only

This project tackles information gaps hindering effective deployment of anti-money laundering (AML) measures against the illegal wildlife trade (IWT). It will produce typologies detailing financial flows associated with specific IWT cases, derived from in-depth research and field investigations. This information will be provided to a range of public sector agencies and private sector banks in Africa and Asia followed by engagement to ensure appropriate action. The project will leverage international AML processes to ensure inclusion of IWT in national strategies.

## 5. What will be the Outcome of the project?

(See Guidance Notes 3.1 and 4, and Annex B - guidance on developing a logframe)

This should be an action orientated statement e.g. training provided to the judiciary results in increased successful prosecutions of poaching. This should be the same as the Outcome statement given in Question 25.

(Max 30 words)

Enhanced capabilities and commitment of the public and private sectors to deploy anti-money laundering measures against wildlife trafficking syndicates, effectively curtailing their activities.

## 6. Which of the four key IWT Challenge Fund objectives will your project address?

#### **6.a. Put an X in all that apply** (See Guidance Note 3.1)

1.	Developing sustainable livelihoods and economic development, to benefit	
	people directly affected by IWT	
2.	Strengthening law enforcement	Х
Ensuring effective legal frameworks     x		
4.	Reducing demand for the products of the illegal wildlife trade	

6b. Which of the commitments made in the London Conference Declaration, the Kasane Statement and/or the Hanoi Conference does this project support? Please provide the number(s) of the relevant commitments: there is no need to include the text from the relevant commitment. See Guidance Notes 4.1 and Annex A)

London Declaration commitments IX, X, XV, XVI

Kasane Statement commitments 4 and 5

#### 6c. Global Goals for Sustainable Development (SDGs)

Please detail how your project will contribute to the Global Goals for Sustainable Development (SDGs).

(Max 250 words)

The project will contribute to the attainment of two of the 17 Sustainable Development Goals (SDGs). It is especially relevant to SDG 15 Life on Land due to its focus on curbing illegal wildlife trade as a means of reducing biodiversity loss. Successful implementation of the project will assist in achieving Target 15.7, which calls for "urgent action to end poaching and trafficking of protected species of flora and fauna and address both demand and supply of illegal wildlife products", through the enhanced use of financial investigations to dismantle wildlife trafficking syndicates responsible for trafficking a host of endangered species and thereby curbing supply. Through its focus on building support at the international level for deployment of anti-money laundering processes against wildlife crime the project is also relevant to Target 15.12, which seeks to "enhance global support for efforts to combat poaching and trafficking of protected species". Furthermore, the project will contribute to SDG 16 on Peace, Justice and Strong Institutions, specifically Target 16.4 which seeks to "significantly reduce illicit financial flows, strengthen the recovery and return of stolen assets and combat all forms of organised crime". The project's focus on using anti-money laundering typologies to identify and seize funds linked to wildlife crime and using financial investigations against transnational trafficking syndicates is highly relevant to this target.

## 7. Country(ies)

(See Guidance Notes 3.3 and 4.5)

Which eligible country(ies) will your project be working in? You may copy and paste this table if you need to provide details of more than four countries.

	Country 2: Singapore [N.B. This will be covered by co-funding]
Country 3: Vietnam	Country 4: Lao PDR

Country 5: Malawi	Country 6: Malaysia
Country 7: Kenya	Country 8: Tanzania
Country 9: Mozambique	Country 10: Zambia

## 8. a. About the lead organisation:

	Environmental Investigation Agency (EIA) Ltd was established as a non-profit company in 1984. EIA was registered as a charity in 1994 (number).
	Following a restructuring in 2012 EIA in the UK was separated into two entities:
What year was your organisation established/ incorporated/ registered?	Environmental Investigation Agency Trust Ltd is a UK registered charity (number) and a company limited by guarantee registered in England and Wales (number), incorporated on 11th November 2011.
	Environmental Investigation Agency (UK) Limited is a registered not-for-profit company limited by guarantee (number) incorporated on 25th August 2011.
What is the legal status of your	NGO Yes
organisation?	Government No
	University No
How is your organisation currently funded?	(Max 100 words)  EIA is funded through donations from individuals, legacies and corporate donors. EIA is also funded through grants from private trusts and foundations and statutory sources.
Have you provided the requested signed audited/independently examined accounts?	Yes

8b. Provide detail of 3 contracts/projects previously undertaken by the lead organisation that demonstrate your credibility as an organisation and provide track record relevant to the project proposed. These contacts should have been held in the last 5 years and be of a similar size to the grant requested in your IWT Challenge Fund application. They can include IWT Challenge Fund and Darwin

## Initiative projects

Contract/ Project 1 Title	Independent Monitoring of Commitments Enshrined in the London Declaration on Illegal Wildlife Trade
Contract Value/ Project budget	£
Duration	4 years 2014-2018
Role of organisation in project	Lead organisation. Research and analysis, outreach and advocacy
Brief summary of the aims, objectives and outcomes of the project.	The aims and objectives were to develop a monitoring framework against which country progress to implement commitments made to tackling illegal wildlife trade at the London Conference and subsequent high-level meetings could be measured, provide independent analysis and assessment to the international community to hold individual countries to account and to provide independent analysis to support effective enforcement and policies that reduce demand rather than stimulate it. Information has been gathered through extensive research including findings from EIA field investigations on tiger and ivory trade, analysis and outreach on illegal wildlife trade. The information gathered through this process has been used to produce comprehensive reports and country profiles highlighting key concerns and best practice in ongoing efforts to combat illegal wildlife trade. The desired outcome is that decision makers in governments, law enforcement and judiciary will be better informed to take action to ensure effective enforcement against wildlife crime and end policies that stimulate demand.
Client contact details	The Rufford Foundation. Simon Mickleburgh
(Name, e-mail,	
address, phone	
number).	

Contract/ Project 2 Title	Combating Illegal Ivory Trade: Training Film to Aid Enforcement Officers (IWT030)
Contract Value/	£
Project budget	
Duration	2 Years, 2016-2018
Role of organisation in	Lead Agency
project	

number).

Brief summary of the aims, objectives and outcomes of the project.	The project aims to produce a film that can be incorporated into training activities in priority countries to encourage more effective enforcement activities applicable throughout the ivory trade chain to better detect, disrupt and prevent elephant poaching and ivory trafficking. Filming and interviews took place in 15 countries and the film has been produced in English and translated into 8 languages to maximise its global reach and impact. The outcome of the project is better informed enforcement and prosecution communities in priority African elephant range states, transit and ivory demand countries. It is anticipated that the promotion of best practice will positively influence criminal justice efforts in tackling elephant poaching and illegal ivory trade in priority countries, thereby reducing the impact of this threat to elephant populations.
Client contact details (Name, e-mail, address, phone	Defra Illegal Wildlife Trade Challenge Fund, Victoria Pinion, LTS International Ltd, Pentlands Science Park, Bush Loan, Penicuik, EH26 0PL

Contract/ Project 3 Title	Strengthening EIA's Capacity to Curb Wildlife Crime
Contract Value/ Project budget	€
Duration	3 years, 2014-2016
Role of organisation in project	Lead Organisation. Organisational development, research and investigations into wildlife crime. Advocacy and communications related to tackling wildlife crime.
Brief summary of the aims, objectives and outcomes of the project.	The objective was to strengthen EIA institutional capacity to sustain operational outputs to stem the proliferation of organised wildlife crime. The grant supported strategic organisational development, infrastructure for fundraising and communications activities, field investigations, advocacy, the production of reports and films, media work on wildlife campaigns, joint work with other NGOs and relationship building with enforcement authorities.  The outcomes were: 1) Enhanced capacity of EIA's institutional support functions, technical infrastructure support and sustained
	operational growth; 2) Detailed information on incidents on wildlife crime aided enforcement, policy-making and consumer outreach; 3) Increased political and financial commitment to improve regulatory frameworks and enforcement to combat wildlife crime; 4) Expanded cooperation with government agencies and civil society organisations to tackle wildlife crime.
Client contact details (Name, e-mail, address, phone number).	Adessium Foundation. Martijn Meijer

## 9. Project partners

Please list all the partners involved (including the Lead Organisation) and explain their roles and responsibilities in the project. Describe the involvement at all stages, including project development. This section should illustrate the capacity of partners to be involved in the project, and how local institutions, local communities, and technical specialists are involved as appropriate. Please provide written evidence of partnerships.

Please copy/delete boxes for more or fewer partnerships.

Date logged:

Lead Organisation name:	Environmental Investigation Agency (UK) Limited (referred to as EIA)
Website address:	www.eia-international.org
Details (including roles and responsibilities and capacity to engage with the project):	(Max 200 words)  EIA will oversee project management and evaluation.  EIA has led on the development of this project, in close consultation with Liberty Asia (LA) with whom EIA has been collaborating since 2016, including in the development of one of the first detailed typologies on the illegal wildlife trade.
	During the course of the project EIA will be responsible for conducting research and investigations into specific IWT flows spanning Africa and Asia, drawing on EIA's 30 years of experience in this field. EIA will use this information to develop detailed typologies on each of the cases, with input and advice from LA.
	EIA will be responsible for developing channels to communicate the typologies to relevant government Financial Intelligence Units (FIUs), envisaged under project Output 1. EIA will utilize experience and contacts developed as a partner in previous and current IWT projects led by the Royal United Services Institute (RUSI) providing training in financial investigations to six African countries (five of which are covered in this proposal) to achieve synergies.
	EIA will also present typologies to interested private sector financial institutions, initially 12 global banks, and media monitoring to provide IWT case information for inclusion in the World-Check system, under project Output 2.

Partner Name:	Liberty Asia (hereafter referred to as LA)
Website address:	www.libertyasia.org
Details (including roles and responsibilities and capacity to engage with the project):	(Max 200 words)  LA will deploy its expertise in developing mechanisms to sensitise private sector financial institutions to the risks associated with human trafficking throughout the duration of the project. It will offer technical advice (including the provision of a guidance manual) to EIA in creating effective typologies.  LA will play a key role in communicating the wildlife crime typologies to its network of financial institutions, initially 12 global banks using a secure platform developed by the organisation, as well as organising follow-up discussions with specific banks as part of project Output 2. LA will also be responsible for providing IWT cases identified through EIA's media monitoring into databases used by banks to carry out due diligence checks.  Under project Output 3 LA will use its contacts developed under anti-human trafficking work with the international Financial Action Task Force (FATF), the Egmont Group on FIUs and regional anti-money laundering bodies to raise awareness of illicit financial flows associated with wildlife crime and to promote the inclusion of IWT in pending National Risk Assessments, depending on project country evaluation schedules.
Have you included a Letter of Support from this organisation?	Yes Comments if No:

Partner Name:	Royal United Services Institute (hereafter referred to as RUSI)
Website address:	www.rusi.org
Details (including roles and responsibilities and capacity to	(Max 200 words)
engage with the project):	RUSI is the UK's leading independent, not-for-profit research institute on national-security studies. RUSI's Security and Resilience group has an established track record of research into organised crime, illicit financial flows, governance and development, particularly in East Africa.
	RUSI is the lead agency for two Defra IWT Challenge Fund projects ("Follow the Money" and "Follow the Money 2") under which training is provided to the public and private sectors in six African countries. Five of the six countries covered also feature in this proposal, ensuring synergies by following up the training with provision of specific case information on financial flows associated with wildlife crime.
	For this project under Output 1 RUSI will assist in establishing effective communication channels with FIUs for information provision, based on its network of existing contacts (including those built during other Defra IWT Challenge Fund projects outlined above).
	RUSI will also play an important role in achieving Output 3 through its high level of engagement in the FATF processes and experience in liaising with the regional AML bodies. RUSI's detailed knowledge of the FATF mutual evaluation process will also assist in promoting the inclusion of IWT in National Risk Assessments taking place during the project's duration.
Have you included a Letter of Support from this organisation?	Yes Comments if No:

## 10. Project staff

Please identify the core staff on this project, their role and what % of their time they will be working on the project. Please provide 1 page CVs for these staff or a 1 page job description or Terms of Reference for roles yet to be filled. Please include more rows where necessary. These should match the names and roles in the budget spreadsheet.

Please include more rows where necessary.

Name (First name, Surname)	Role	% time on project	1 page CV attached?	
Julian Newman	Project Leader and Campaigns Director (EIA)	13%	Yes	
Steve Farrer	Head of Actionable Research Programmes (Liberty Asia)	10%	Yes	
Vacant	Senior Crime Analyst (EIA)	21%	Yes [job description]	
Valarie Farabee	Manager, Actionable Research Programmes- Typologies (Liberty Asia)	17%	Yes	
Tom Keatinge	Director (RUSI)	6%	Yes	
Samantha Rainsford	Crime Analyst (EIA)	18%	Yes	
Confidential for security reasons	Field Operative (EIA)	46%	Yes	

## 11. Species project is focusing on

(See Guidance Note 4.2)

Where there are more than 4 species that will benefit from the project's work, please add more boxes.

1. African Elephants	2. Tigers
3. African and Asian Pangolins	4. African Rhinoceros

## 12. Problem the project is trying to address

What specific aspect(s) of the illegal trade in wildlife will your project address? Please describe the level of threat to the species concerned. Please also explain which communities are affected by this issue, and how this aspect of the illegal trade in wildlife relates to poverty or efforts of people and/or states to alleviate poverty.

#### (Max 300 words)

This project addresses profound information gaps which impede the routine use of financial investigations to curb the IWT. It is estimated that wildlife crime generates between \$7 and 23 billion in criminal proceeds annually, yet examples of AML techniques being used to identify and prosecute culprits are rare. This failure perpetuates the notion that for criminals the IWT represents a low risk and high profit opportunity. All too often when a major seizure of contraband wildlife products occurs there is no parallel financial investigation by FIUs to identify key facilitators and syndicate members, rendering such confiscations a business expense rather that an operational threat to the criminals involved.

Failure to deploy financial investigations and AML laws against IWT is recognised in several analyses. The UNODC in 2016 <u>surveyed</u> 45 jurisdictions and found that while 86 per cent reported being affected by wildlife crime, only 26 per cent of countries surveyed had conducted financial investigations into wildlife crimes, and in only one per cent of cases were AML laws used. Similarly, the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) recently highlighted a dearth of information held by FIUs in the region on financial flows associated with wildlife trafficking.

Such information gaps also hinder the private sector response to tackling illicit financial flows associated with IWT. Banks' in-house investigation departments often lack knowledge of wildlife crime types.

IWT is the key threat to the survival of the target species. Without effective action to tackle the proceeds of IWT criminal organisations will continue to have sufficient resources to target a host of endangered species, moving into regions and species where the biggest profits are to be made. Illicit profits from IWT also contribute to global illicit financial flows and corruption, which rob states of much-needed revenue, impact livelihoods and undermine good governance.

## 13. Methodology

Describe the methods and approach you will use to achieve your intended outcomes and impact. Provide information on:

- How you have analysed historical and existing initiatives and are building on or taking work already done into account in project design
- How you will undertake the work (materials and methods)
- How you will manage the work (roles and responsibilities, project management tools etc.).

Please make sure you read the Guidance Notes, particularly Section 3, before answering this question.

(Max 750 words - this may be a repeat of some information from Stage 1, updated or refined as necessary. Tracked changes are **not** required.)

The project draws upon the relevant previous experience of the project partners and analysis of pertinent reports and initiatives in the sphere of anti-money laundering and IWT aimed at strengthening enforcement and ensuring effective legal frameworks.

EIA has considerable experience of documenting IWT flows, covering source, transit and destination countries, especially from Africa to Asia. EIA's on-going tracking of major seizure incidents reveals cases where prosecutions failed and financial investigations were absent. In 2015 EIA presented at the APG meeting, which for the first time discussed the issue of "Wildlife Crime Financial Flows".

This project will build upon RUSI's expertise and activities under two Defra IWT Challenge Fund projects (mentioned above). Five of the six countries covered by the RUSI projects also feature in this proposal, ensuring synergies by following up the training with provision of specific case information on financial flows associated with wildlife crime.

EIA began collaborating with LA in 2016, leading to the production of one of the most detailed typologies on financial flows associated with IWT to date, based on a major ivory trafficking syndicate operating out of Tanzania. The term "typology" refers to various techniques used to launder money from criminal activities and identifies the main actors and facilitators along the supply chain, and associated money flows.

LA has developed a unique model to curb money laundering associated with human trafficking, especially in the fisheries sector in Asia. This involves providing typologies on specific cases to a range of financial institutions in Asia via a secure platform, highlighting red flags to assist banks' in spotting suspicious transactions. LA has also devised a system for providing open source information on criminal cases to database used by banks to screen customers such as the "World-Check" database.

This project is an innovative initiative, transposing a model developed to curb illicit financial flows linked to human trafficking to wildlife crime. It leads on from efforts to build capacity for countries to conduct financial investigations linked to IWT through the provision of accurate and detailed information on actual cases in the form of typologies.

The specific methods which will be used to deliver each of the project Outputs are detailed below:

#### Output 1:

EIA will conduct detailed research and investigations into specific IWT cases in the project countries. Detailed findings will be recorded in internal trip reports and transcripts, which will then be used to develop narrative and visual typologies, with support and advice from LA. EIA and RUSI will be responsible for building relationships and disseminating these typologies to FIUs with support from RUSI. These typologies will be anonymised to avoid potential problems in dealing with confidential information. Through this interaction financial investigators in FIUs will gain a greater understanding of illicit money flows linked to IWT and a fuller picture of the global supply chains, thereby fostering international cooperation.

#### Output 2:

LA will be responsible for sharing typologies produced under the project with global banks spanning Africa and Asia. This will initially focus on 12 major banks LA has developed relationships through anti-human trafficking work. It is anticipated that the number of recipient banks will increase as the project progresses.

LA will use its secure server system to communicate with banks, initially providing an anonymised version of the typology, followed by a full version at the banks' request. This method has been devised by LA based on legal advice to avoid potential defamation action and maintain commercial confidentiality. EIA will participate in providing full details of each case to interested banks, usually via a conference call. In addition, EIA will supply details of open source IWT cases to LA on a monthly basis, which will then be submitted to World-Check and other databases used by banks for due diligence checks via a secure platform.

#### Output 3:

Project partners will jointly conduct outreach to the FATF and regional AML bodies in Africa and Asia, to increase knowledge of wildlife crime-linked financial flows. RUSI's record of engagement with these organisations will be especially useful in gaining access. Where possible the project partner will use the typologies produced to promote the inclusion of wildlife crime in the National Risk Assessments scheduled to be conducted in five of the target countries during the project.

#### **Project Management:**

The project will be managed by EIA and implemented with LA and RUSI. The Project Leader will be responsible for implementation and financial management. Coordination with the project partner will be ensured through detailed activity planning on a quarterly basis.

#### 14. Beneficiaries

Who will benefit from the work outlined above, and in what ways? How will this contribute to sustainable development for the reduction of poverty? How many people are likely to benefit from this intervention e.g. number of households, and how do you intend to monitor the benefits they accrue?

If your project is working in an Upper Middle Income Country, please explain how benefits will be delivered to people living in poverty in Low and/or Low Middle Income countries.

Include, where possible, information on whether and how there are ways to support the most vulnerable communities, including women.

Demand reduction projects should clearly demonstrate their indirect links to poverty reduction, for example, by identifying impacts in the source countries for the products concerned.

#### (Max 750 words.)

The project's main beneficiaries will be the public sector agencies charged with curbing wildlife and financial crimes and private sector financial institutions which are obligated to tackle money laundering, conduct due diligence on customers and report suspicious transactions to the authorities. Through the provision of detailed information on money flows associated with wildlife crime in the form of case-specific typologies the project will improve awareness amongst key government agencies, principally FIUs, of IWT-linked money laundering and increase their ability to take legal action against the perpetrators, including seizure of assets. Provision of similar information to private sector financial institutions will increase their understanding of wildlife crime methodologies and aid in developing red flags for suspicious transactions and customer profiling.

In addition to filling information gaps which hinder successful financial investigations against IWT, the project will also serve to create better cooperation between the main beneficiaries. At the national level case details and typologies will be communicated to FIUs and relevant enforcement agencies in a bid to prompt parallel financial investigations. At the international level typologies produced by the project will span the entire supply chain from destination and transit to source countries, illustrating money flows along the chain and promoting better collaboration between FIUs and other agencies across the countries involved.

Enhanced use of financial investigations in wildlife crime cases will allow a more comprehensive picture of the culprits involved at higher levels of the criminal networks, rather than just poachers, and so dismantle the syndicates through effective prosecution including anti-money laundering laws.

The exact number of primary beneficiaries in banks, FIUs and other government agencies that will benefit from involvement in the project is difficult to quantify at the outset. It is predicted that at least two compliance officers in each of the 12 banks the project partners will initially communicate will benefit initially, with this number growing during the term of the project. In addition, it is predicted that at least two staff from each FIU and two officers from other enforcement agencies per country will benefit, giving a total of 40 individuals. However, it is anticipated that the detailed information and knowledge imparted through the project will reach far beyond the individuals identified above. Due to severe information gaps in the area of IWT-linked money flows it is expected that the information contained in the typologies will be well received and shared between different agencies. Throughout the project steps will be taken to monitor the benefits accrued through communication with personnel who receive the typologies and through measuring cooperation between agencies, financial investigations and cases using AML laws to prosecute traffickers and through communication with FATF and regional AML bodies.

Deploying financial investigations against the higher echelons of IWT syndicates will break supply routes to consumer markets and reduce contacting of poachers in source countries, leading to an overall fall in the level of poaching in target countries. This has important livelihood implications for rural communities in the African countries covered by the project. In all five of these countries tourism is an important component of the economy, with wildlife a major attraction. For example, wildlife watching represents 80 per cent of the total annual sales of tourism trips to Africa. A study found that elephant poaching in Africa costs \$25 million a year in terms of lost economic benefits linked to tourism. The protection of iconic species through reduced wildlife poaching will bolster poverty alleviation in rural areas through growth in tourism.

The project will encompass two Upper Middle Income countries – China and Malaysia – which are important transit and destination countries for IWT. More effective enforcement actions encompassing financial investigations in these countries will curb the activities of smuggling syndicates and reduce poaching pressure in Low and Low Middle Income countries included in the project.

Citizens in source countries in Africa will also benefit from the enhanced capability of government agencies to curb wildlife crime-linked illicit financial flows from the continent. It is estimated that Africa loses up to \$80 billion in illicit financial flows a year, greatly undermining governments' ability to provide vital services and infrastructure for growing populations. Methods used to launder the proceeds of IWT share similarities with other crime types, such as the use of underground money changers, as well as concealment of money looted through corruption such as laundering through apparently legitimate companies. Enhancing the ability of agencies to identify and seize assets linked to IWT will have a multiplier effect in terms of tackling wider illicit financial flows.

#### 15. Gender

(See Guidance Note 4.6)

All applicants must consider whether and how their project will contribute to reducing inequality between persons of different gender. Explain how your project will collect gender disaggregated data and what impact your project will have in promoting gender equality.

(Max 300 words)

In line with the International Development Act (Gender Equality) 2014, the project partners are committed to ensuring gender equality and equity are promoted throughout the project.

All outreach activities will be aimed at reaching and benefitting both men and women working in public sector agencies charged with curbing wildlife and financial crimes and in the and private sectors equally. It is recognized that there may be unequal gender representation in these agencies that contribute to more men benefitting from the activities than women. However, we will monitor any obstacles to equal participation and address them to ensure as equal representation as is possible.

EIA's research and investigations into IWT indicate that both men and women are involved in the syndicates using money laundering to finance the trade. EIA advocates for intelligence led enforcement to target the major criminals controlling wildlife crime regardless of gender.

At the community level, the reduction of illicit financial flows linked to wildlife crime through the investigation and prosecution of criminal syndicate leaders and facilitators will increase equality including gender equality through improved rule of law and good governance. By ensuring revenue is not lost more investment can also be made into services and infrastructure that equally benefit the needs of men and women and boys and girls. Since the project is not working at the community level we are not planning to collect data related to gender impacts but will report back on any unexpected benefits and monitor any unintended negative impacts that may arise related to gender from the project.

## 16. Impact on species in focus

How will the species named in Question 11 above benefit from the work outlined above? What do you expect the long-term impact on the species concerned to be?

(Max 200 words)

Poaching for the illegal wildlife trade poses a direct threat to the future survival of African elephants, rhinoceroses, pangolins and tigers. For example, the African Elephant Census recorded a 30 per cent drop in savannah elephant populations between 2007 and 2014, mainly due to poaching. Illegal trade in pangolins has surged in recent years, especially from Africa where there is growing evidence of ivory trafficking syndicates diversifying into smuggling pangolins. Both tigers and rhinos are also under severe poaching pressure.

The project will alleviate this poaching pressure through utilizing financial investigations to prompt more effective enforcement action against the upper echelons of smuggling syndicates, spanning key source, transit and destination countries. EIA research reveals that many of the major smuggling syndicates trade in a host of animals, and disrupting their activities can benefit a range of endangered wildlife. Ultimately dismantling transnational IWT syndicates through targeting associated illicit funding flows as part of a more proactive enforcement response will hinder the ability of these groups to move contraband wildlife to destination markets, reducing the level of poaching. Activities undertaken will contribute to stabilizing the populations of the target species initially followed by increases in numbers as the scale of IWT subsides.

## 17. Exit strategy

State how the project will reach a stable and sustainable end point, and explain how the outcomes will be sustained, either through a continuation of activities, funding and support from other sources or because the activities will be mainstreamed in to "business as usual". Where individuals receive advanced training, for example, what will happen should that individual leave?

#### (Max 200 words)

This project will have lasting impacts by focusing on providing key institutions with detailed information on actual IWT cases, effectively raising awareness of related financial flows and the need for financial investigations to curtail criminal syndicates which together with wider governmental support will lead to the systematic application of financial investigations and AML laws to counter wildlife trafficking.

The provision of typologies to private sector banks will increase the ability of their investigative and compliance departments to detect suspcious transactions and customers linked to IWT. By learning lessons from the growing involvement of banks in efforts to counter human trafficking, the project will ensure that major financial institutions take steps to curtail IWT-related financial flows by embedding IWT risk assessment as a routine practice in terms of due diligence and compliance procedures.

The project addresses chronic information gaps which stymie the use of financial investigations and laws to tackle IWT by public sector agencies. Provision of detailed typologies will lead to inceased capability to detect and seize assets linked to IWT and secure prosecutions. Activities with governmental AML bodies will lead to IWT being included in National Risk Assessments, prompting the routine deployment of financial investigations against wildlife criminals.

## **Funding and budget**

Please complete the separate <u>Excel spreadsheet</u> which provides the Budget for this application. Some of the questions earlier and below refer to the information in this spreadsheet.

Please refer to the Finance Guidance for more information.

NB: Please state all costs by financial year (1 April to 31 March) and in GBP. The IWT Challenge Fund cannot agree any increase in grants once awarded.

## 18. Funding

18a) Is this a new initiative or a development of existing work (funded through any source)? Please give details

#### (Max 200 words):

This project is a new initiative, but is derived from related skills and experience of the project partners. EIA has considerable expertise in documenting IWT in the target countries, while LA has developed a proven model of engaging with private sector financial institutions on the issue of human trafficking, which will be transposed to tackle IWT. The two organisations have been collaborating informally since 2016, including the production of a well-received typology on an ivory trafficking syndicate, and the provision of resources and funds under this project will allow the cooperation to be expanded to meet the challenge of combating financial flows linked to wildlife crime.

The project is also designed to achieve synergies with two IWT Challenge Fund projects led by the RUSI where EIA is a project partner. These projects ("Follow the Money" and "Follow the Money 2") provide detailed training to pubic and private sectors in five African countries. These countries also feature in this project, providing the opportunity to follow on from the training with the provision of actual case information prompting financial investigations.

18b) Are you aware of any other individuals/organisations/projects carrying out or applying for funding for similar work?

#### Yes

As mentioned above EIA has been a project partner in two IWT Challenge Fund projects led by RUSI. In terms of similarities this project also intends to focus on improving the private and public sector response to illicit financial flows linked to IWT. The major difference is that while the RUSI work is specifically intended to build capacity and raise awareness through a series of training workshops, this project entails the provision of actual cases identifying financial flows connected to IWT in the form of typologies, and a programme of on-going engagement with relevant FIUs. In addition, this project spans source, transit and destination countries, allowing a full picture of financial flows to be developed, whereas the RUSI projects focus solely on source countries.

18c) Are you applying for funding relating to the proposed project from other sources?

Office use only Da	ite logged:	Logged by:	Application ID:				
No							
19. Co-financ	ing						
19a) Secured							
the costs of the proje	funding successfully levect, including any income ons, trusts, fees or tradir oe committing.	e from other public bo	dies, private				
(See "Finance for Da	ırwin & IWT Challenge F	<mark>und</mark> " and Guidance N	lote 3.3 and 8.1)				
Confirmed:  - £: part of a project financed by the Adessium Foundation (Netherlands) entitled "Expanding EIA's Capabilities to Tackle Wildlife Crime". This funding will be used toward staff costs for the Crime Analyst, Field Operative, field travel and subsistence costs (for 2 out of 6 investigations) and travel to Singapore.							
19b) Unsecured							
Provide details of any co-financing where an application has been submitted, or that you intend applying for during the course of the project. This could include co-financing from the private sector, charitable organisations or other public sector schemes.							
Date applied for	Donor organisation	Amount	Comments				
19c) None							
If you are not propos	sing co-financing, please	e explain why.					
(Max 150 words)							
N/A							

## 20. Financial Risk Management

Explain how you have considered the risks and threats that may be relevant to the success of this project, including the risks of fraud or bribery.

(Max 200 words)

Project activity may be carried out in countries in which there is potential risk of bribery and unethical business conduct. EIA operates an anti-corruption and bribery policy that all employees, consultants and other associated persons are required to comply with in accordance with the Bribery Act 2010. The policy outlines what types of transactions are prohibited and record keeping that is required, as well as the responsibility. to remain particularly vigilant and report any suspicious circumstances to a senior manager.

Partners are expected to adhere to EIA's anti bribery and corruption policy. The contract with partners will outline their responsibilities in relation to any misuse, fraud or misappropriation of funds including immediate notification of EIA of any event which interferes or threatens to materially interfere with successful implementation of the project including credible suspicion of or actual fraud, bribery or any other financial irregularity or impropriety. The failure to do so could lead to termination of funding.

EIA also operates a policy to address risks related to payments being made to suppliers, subgrantees and staff in foreign currencies. The Project Leader will discuss this with Finance at the start of the project, to better manage the currency(ies) required.

## 21. Capital items

If you plan to purchase capital items with IWT funding, please indicate what you anticipate will happen to the items following project end. If you are requesting more than 10% capital costs, please provide your justification here.

(Max 150 words)		
N/A		

## 22. Value for money

Please describe why you consider your application to be good value for money including justification of why the measures you will adopt will secure value for money.

(Max 250 words)

The wide-ranging benefits resulting from increased effectiveness of public and private sector financial institutions in targeting the profits derrived from IWT, compared with the project cost, ensure that this proposal offers good value for money. By the end of the project the provision of detailed financial intelliegence in the form of typologies will have elevated awareness of money flows linked to IWT amongst public and private sector beneficiaries and enhanced their capabilities to appropriate action, creating a lasting legacy.

The project budget also provides value for money through alignment with current systems already created by the project partners. The project will utilize information management systems and specialist software (such as the i2 system which is widely used by enforcement agencies) already in place at EIA. It will also benefit from using a secure platform for disseminating information to banks which has already been developed by Liberty Asia though its work on countering human trafficking. Measures to further minimize costs include the use of online conferencing platforms to present typologies to banks, which reduces the travel budget, and deriving information on IWT-linked money flows from EIA's ongoing programme of research and investigation into willdife crime, which is also funded under co-financing for this project.

## 23. Ethics and human rights

(See Guidance Notes 5.4 and 6.1)

Outline your approach to meeting the IWT's key principles for ethics as outlined in the guidance notes. Additionally, if there are any human rights and/or international humanitarian law risks in relation to your project? If there are, have you carried out an assessment of the impact of those risks, and of measures that may be taken in order to mitigate them?

(Max 250 words)

EIA has over two decades of experience of conducting investigations including in the countries targeted. This contextual knowledge allows the project team to carefully assess and minimise risks and ensure that the rights, privacy and safety of people who are the subject of desk based and field research or other activities are protected.

EIA has robust health and safety and risk assessment procedures in place to mitigate these risks, both to project personnel and persons of interest. In terms of field investigations this includes identifying hazards and mitigating measures, pre-trip checklists and insurance.

EIA adheres to the UK Data Protection Act, in relation to collection, use and retention of information about persons of interest. The collection of information using covert methods. is used where this is justified in the public interest and as a means of upholding the credibility of our findings.

EIA aims to safeguard the rights of individuals and entities who may be the subject of the typologies. The typologies will be presented in anonymized form in the first instance to prevent potential defamation challenges and, only at the request of banks, more detailed information is provided that can be verified via a secure server. Open source information on suspects and facilitators will be sent by EIA to LA who send the information to World Check.

Information for public release will be limited to that which is necessary, relevant, fair and proportionate to the public interest in raising awareness about IWT, and will be reviewed by libel lawyers.

## 24. Outputs of the project and Open Access

(See Guidance Note 5.5)

Please describe the project's open access plan and detail any specific costs you are seeking from the IWT Challenge Fund to fund this.

#### (Max 250 words)

All information generated during the project will be managed according to EIA's internal protocols to ensure safe storage, robust analysis and compliance with relevant data protection rules. EIA is registered with the UK's Information Commissioner's Office to hold data, and procedures are currently underway to ensure compliance with the forthcoming EU General Data Protection Regulation. In addition, information supplied to banks will be managed through LA's secure server to ensure confidentiality.

The main output of the project will be a series of case-specific typologies (in both narrative and visual forms). For reasons of confidentiality and security these will be only be shared with the intended recipients in government agencies and banks. Anonymised versions will be made publicly available via EIA's website.

During the project two published reports will be released, summarising findings from investigations into IWT and linked financial flows. These reports will be written and designed inhouse and be disseminated via EIA's website and social media accounts and press releases.

Throughout out the project EIA will seek to issue press releases highlighting IWT-linked financial flows at opportune times, such as the London Conference in October 2018. These press releases will be distributed via EIA's media contacts database and placed on the organisation's website.

EIA and LA will also seek opportunities to share findings from the project through presentations at relevant meetings and conferences, such as annual meetings of regional AML bodies.

## **Project monitoring and evaluation**

## 25. Logical framework

IWT Challenge Fund projects will be required to monitor (and report against) their progress towards their expected outputs and outcomes. This section sets out the expected Outputs and Outcome of your project, how you expect to measure progress against these and how we can verify this.

#### Annex B and Annex C in the Guidance provides helpful advice on completing a logical framework

Project summary	Measurable Indicators	Means of verification	Important Assumptions
Impact:			
(Max 30 words)			
	ures in illegal wildlife trade cases erodes	the capabilities of trafficking networks	leading to a reduction in poaching and
enhanced livelihood opportunities in se	ource countries.		
Outcome:	0.1: By December 2019 a target of 5	0.1: Quarterly project action plans,	- FIUs in target countries have the
(Max 30 words)	FIUs in project countries that have	records of engagement and	remit and resources to analyse IWT
	received typologies have conducted	correspondence with FIUs and law	cases and channels to communicate
Enhanced capabilities and	follow-up analysis into the individuals	enforcement agencies	and cooperate with government law
commitment of the public and private	and entities identified and		enforcement agencies to ensure
sectors to deploy anti-money	disseminated findings to law	0.2: Quarterly project action plans,	cases are followed up
laundering measures against wildlife	enforcement agencies, rising to a	records of engagement and	'
trafficking syndicates, effectively	target of 8 FIUs in total conducting	correspondence with banks	- Financial investigations lead to
curtailing their activities.	financial analysis and dissemination	'	legal actions sufficient to hinder the
	by mid-2020 (from a baseline of 0).	0.3: Records of engagement and	activities of wildlife crime syndicates
	,	correspondence with FIUs and other	,
	0.2 By December 2019 at least 6	government agencies, media	- Banks regard potential exposure to
	international banks (based on a	monitoring, court records	money laundering linked to wildlife
	minimum of 12 engaged in the	,g,g	crime as an issue of concern
	project) that have received	0.4: Records of engagement and	
	typologies have followed up with	correspondence with banks, log of	-Disruption of IWT syndicates will
	remedial actions against the	submissions to World-Check, survey	alleviate poaching pressure on target
	individuals and entities identified,	of banks in project year 2	species in source countries

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	rising to a target of at least 9 banks pursuing remedial actions by mid-2020 (from a baseline of 0).  0.3: By mid-2020 enforcement agencies in at least 5 project countries have demonstrably used financial investigations in IWT cases (from a baseline of 1).  0.4: By mid-2020 a target of at least 9 international banks (based on a minimum of 12 banks engaged in project) receiving typologies from project partners have used the information to refine due diligence and develop red flags for IWT-linked financial flows (from a baseline of 0).  0.5 By mid-2020 5 project countries formally recognise wildlife trafficking as an important AML risk and take measures to mitigate it (from a baseline of 0)		
Outputs:  1. Greater awareness of illicit financial flows linked to illegal trade cases through the provis detailed typologies to national and other relevant government enforcement agencies in projecountries.	field investigations completed, that yield financial intelligence of use to FIUs and other government	case inventory database, video and still photographs and reports from field research.	Safety and security situation in project countries sufficient to allow planned activities to take place     Research and investigations yield sufficient relevant information for typologies to be produced      FIUs and other agencies willing to accept information from project

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	2019 (from a baseline of zero)  1.2: By mid-2020 at least one typology provided to 10 FIUs (1 per country) and 20 other relevant government enforcement agencies (2 per country) in project countries, with an interim target of at least one typology provided to 5 FIUs and 10 other government agencies by mid-2019.  1.3 Effective relationships established with 10 FIUs by end of 2019, with an interim target of 5 by end of 2018 developed through joint provision of financial intelligence training workshops with RUSI in 2017 and 2018 (from a baseline of 2).	1.3: Email or other correspondence between EIA and FIUs, internal reports of meetings	partners
2. Regular information provision to private sector financial institutions enhances understanding of risks associated with illegal wildlife trade and embedded in customer due diligence systems	2.1: By mid-2020 at least 6 typologies on IWT cases have been produced based on a target of 6 field investigations completed that yield financial intelligence of use to banks, with an interim target of at least 3 typologies on IWT cases based on 3 field investigations completed produced by mid-2019 (from a baseline of 0).  2.2: Number of banks receiving typologies on IWT cases reaches at least 18 banks by mid-2020 from a baseline of 4 banks receiving	<ul> <li>2.1: Quarterly project activity plans, EIA project tracker system, EIA's case inventory database, Video and still photographs and notes from field research.</li> <li>2.2: Record of dissemination via secure server, internal log of interactions with banks, feedback from survey of banks in project year 2</li> <li>2.3: Record of correspondence and meetings with banks, reports from RUSI-led training courses for private</li> </ul>	<ul> <li>Safety and security situation in project countries sufficient to allow planned activities to take place</li> <li>Research and investigations yield sufficient relevant information for typologies to be produced</li> <li>Financial institutions are sufficiently concerned by potential exposure to IWT and reputational risk to act on typologies provided by project partners</li> <li>Project partners are able to expand</li> </ul>

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	typologies from project partners prior to the project commencing.  2.3: Effective communication channels established with 18 international and regional banks by mid-2020 from a baseline of 12 prior to project commencing.  2.4: Common "red flags" used to identify financial flows and entities connected to IWT are derived from typologies provided and used routinely by at least 12 banks by mid-2020, with an interim target of 6 banks using "red flags" by September 2019 (from a baseline of 0).  2.5: Number of wildlife traffickers and associated companies uploaded into customer due diligence databases (such as World-Check) used by banks based on submission by project partners increases to at least 250 a year by mid-2020 (from a baseline of 100 in 2017).	sector in 5 of the project countries  2.4: Internal log of interactions with banks, feedback from survey of banks in project year 2, meetings with banks  2.5: EIA's spreadsheets of monthly submissions, LA's records of submissions to databases, monthly feedback from database operators	their network of contacts with banks beyond Asia, especially in Africa  - Banks' customer due diligence procedures are sufficiently robust to avoid offering services to individuals and companies implicated in IWT cases included in databases
3. Engagement with international and regional anti-money laundering bodies, including dissemination of reports and briefings, elevates the profile of IWT and ensures it is embedded in National Risk Assessments conducted during the project in relevant countries.	3.1: At least one report per year (one by mid-2019 and one by mid-2020) summarising financial flows linked to IWT cases provided to regional AML bodies (APG and ESAAMLG) and FATF (from a baseline of 0 reports produced in the past).	3.1: Quarterly project activity plans, EIA's internal project tracker, report production schedules, feedback from regional and international AML bodies  3.2: Invitations to project partners to attend relevant meeting, internal	<ul> <li>FATF and regional AML bodies willing to engage with project partners</li> <li>National Risk Assessments result in an accurate analysis of threats posed by IWT</li> </ul>

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3.2: Sessions on IWT typologies included as a matter of routine in annual meetings of APG and	back to office reports, official meeting reports
ESAAMLG.  3.3: IWT identified as a significant	3.3: Records of interactions with FIUs, public statements by FATF and regional AML bodies, analysis of
money laundering risk in 3 out of 5 project countries scheduled to undertake National Risk Assessments by mid-2020 (from a baseline of 0).	initial risk assessments

Activities (each activity is numbered according to the output that it will contribute towards, for example 1.1, 1.2 and 1.3 are contributing to Output 1)

- 1.1 Desk research into IWT cases including news reports, seizure data, and social media monitoring
- 1.2 Targeted field investigations into IWT cases, based on research outputs
- 1.3 Production of typologies (narrative and visual) derived from investigation findings
- 1.4 Dissemination of typologies to relevant FIUs and other government agencies
- 1.5 Follow-up meetings with FIUs to discuss typologies
- 2.1 Desk research into IWT cases including news reports, seizure data, and social media monitoring
- 2.2 Targeted field investigations into IWT cases, based on research outputs
- 2.3 Production of typologies (narrative and visual) derived from investigation findings
- 2.4 Communication of typologies to interested banks via LA's secure platform
- 2.5 Follow-up briefings to interested banks through conference call platforms
- 2.6 Media monitoring of IWT cases, including Chinese language reports
- 2.7 Monthly submission of information derived from media monitoring to customer due diligence databases
- 3.1 Published report on opportunities to use AML measures against IWT released to coincide with the London Conference on IWT in October 2018
- 3.2 Published report in late 2019 summarising typologies produced under the project
- 3.3 Attendance at annual meetings of regional AML bodies in Asia and Africa
- 3.4 Meetings and engagement with FATF
- 3.5 Analysis of initial National Risk Assessment findings

## 26. Provide a project implementation timetable that shows the key milestones in project activities

Complete the following table as appropriate to describe the intended workplan for your project (starting from Q2 July 2018). Please add/remove columns to reflect the length of your project. For each activity (add/remove rows as appropriate) indicate the number of months it will last, and fill/shade only the quarters in which an activity will be carried out. The workplan can span multiple pages if necessary.

Activity		No. of Year 1			Year 2				Year 3			
	months	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Output 1												
1.1	24											
1.2	18								•		•	
1.3	18											
1.4	18											
1.5	18											
Output 2												
2.1	24											
2.2	18											
2.3	18					<b>†</b>	<b></b>					
2.4	18											
2.5	18											
2.6	24											
2.7	24											
Output 3												
3.1	4											
3.2	4											
3.3	2											
3.4	21											
3.5	21											

## 27. Monitoring and evaluation plan (M&E)

Describe, referring to the indicators above, how the progress of the project will be monitored and evaluated, making reference to who is responsible for the projects M&E.

IWT Challenge Fund projects will need to be adaptive and you should detail how the monitoring and evaluation will feed into the delivery of the project including its management. M&E is expected to be built into the project and not an 'add' on. It is as important to measure for negative impacts as it is for positive impact. Additionally, please indicate an approximate budget and level of effort (person days) to be spent on M&E (see "Finance for Darwin and IWT Challenge Fund")

#### (Max 500 words)

Throughout its duration monitoring and evaluation will be embedded in the project to ensure outputs remain on track and adaptations made where necessary as the project progresses. The M & E plan will be largely based on the project partner's current information collation and assessment systems, with additional project-specific tools being developed. Overall responsibility for M & E will be held by the Project Leader, supported by the Senior Crime Analyst and LA's Manager.

At the outset the relevant staff from EIA and LA will hold a two-day meeting to discuss roles and responsibilities, including M & E requirements, and to agree priorities for the first six months of the project. Every quarter key staff will hold a conference call to assess progress and identify potential problems with implementation. Throughout the project quarterly action plans will be created by the project partners. These will refer to project activities, specifying timelines and project staff members responsible for delivery, as well as estimated costs. At the end of each quarter these plans will be assessed in terms of completion and implementation and will include lessons learned so that the project can be refined accordingly as it progresses.

EIA will ensure that the project is captured in its internal M & E system. Each year EIA produces a three-year strategy for all of its campaigns including wildlife crime. These strategies include an M & E framework, based on Outputs, Objectives, Tolerances, Indicators and Verification Sources. As an effective means of regularly measuring progress EIA has adopted a "campaigns tracker" system. This method has been pioneered by WildTeam, a UK NGO, as part of its "Project Management for Wildlife Conservation" approach. It involves setting work packages, minor milestones and major milestones, all of which are assigned to named members of the relevant campaigns team. Prior to commencing the project its Outputs, Indicators and Activities will be inserted into the campaigns tracker.

In addition, LA will capture relevant indicator information for Output 2 through information logs generated through its secure server system. This will yield accurate information on the frequency and type of information provided to banks, as well as follow-up interactions. All project staff will be expected to complete internal trip reports or back to office reports (using templates developed by EIA) for all meetings and trips under the project, allowing a comprehensive record of activities to be developed.

Total project budget for M&E (this may include Staff and Travel and Subsistence Costs)	£
Number of days planned for M&E	35

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Percentage	of total project bud	get set aside for M&E				
FCO notifications						
Please put an X in the box if you think that there are sensitivities that the Foreign and Commonwealth Office will need to be aware of should they want to publicise the project's success in the IWT Fund in the host country.						
Please indicate whether you have contacted your Foreign Ministry or the local embassy or High Commission (or equivalent) directly to discuss security issues (see Guidance Notes) and attach details of any advice you have received from them.						
Yes (no w	ritten advice)	Yes, advice attached		No x		
Certific	ation					
On behalf of the Directors of Environmental Investigation Agency (UK) Limited						
I apply for a grant of £344,541 in respect of <b>all expenditure</b> to be incurred during the lifetime of this project based on the activities and dates specified in the above application						
I certify that, to the best of our knowledge and belief, the statements made by us in this application are true and the information provided is correct. I am aware that this application form will form the basis of the project schedule should this application be						
successful. (This form should be signed by an individual authorised by the applicant institution to submit applications and sign contracts on their behalf.)						
<ul> <li>I enclose CVs for project principals and letters of support.</li> <li>Our last two sets of signed audited/independently verified accounts and annual report are also enclosed.</li> </ul>						
Name (b	ock capitals)	JULIAN NEWMAN				
Position	Position in the organisation CAMPAIGNS DIRECTOR					
			1			
Signed			Date:	20/02/2018		

If this section is incomplete the entire application will be rejected. You must provide a real (not typed) signature. You may include a pdf of the signature page for security reasons if you wish. Please write PDF in the signature section above if you

do so.

#### **Checklist for submission**

	Check
Have you <b>read the Guidance</b> , including the "Guidance Notes for Applicants" and "Finance for Darwin and IWT Challenge Fund"?	x
Have you read, and can you meet, the current <u>Terms and Conditions</u> for this fund?	x
Have you provided actual start and end dates for your project?	х
Have you provided your <b>budget based on UK government financial years</b> i.e. 1 April – 31 March and in GBP?	x
Have you checked that your <b>budget is complete</b> , correctly adds up and that you have included the correct final total on the top page of the application?	х
Has your application been <b>signed by a suitably authorised individual</b> ? (clear electronic or scanned signatures are acceptable, but not the use of a script font)	x
Have you included a <b>1 page CV for all the Project Staff</b> identified at Question 10, including the Project Leader?	х
Have you included a <b>letter of support from the main partner(s) organisations</b> identified at Question 9?	х
Have you included a signed copy of the last 2 years annual report and accounts for the lead organisation?	х
Have you <b>checked the IWT website on GOV.UK</b> immediately prior to submission to ensure there are no late updates?	x

#### **Data Protection Act 1998 - Fair Processing Notice**

The purpose of this Fair Processing Notice is to inform you of the use that will be made of your personal data, as required by the Data Protection Act 1998.

The Department for Environment, Food and Rural Affairs (Defra) is the data controller in respect of any personal data that you provide when you complete your application, the grant acceptance and the supplier forms.

Defra will use your personal data primarily for the purpose of processing your application for Illegal Wildlife Trade (IWT) Challenge Fund funding. By submitting an application,

applicants have agreed to any disclosure of the information supplied (including the content of a declaration or undertaking) which Defra considers necessary for the administration, evaluation, monitoring and publicising of the Funds (as detailed in the paragraphs below).

A completed application form signifies agreement to place certain details of successful applications (i.e. name, title, total grant value, project summary, lead organisation and location of project work) on the Illegal Wildlife Trade (IWT) Challenge Fund website listed below. A completed application form also signifies agreement to send data on the project proposals during the application process to British Embassies and High Commissions outside the UK, including those outside the European Economic Area.

#### https://www.gov.uk/government/collections/illegal-wildlife-trade-iwt-challenge-fund

Application form data will also be processed by Defra contractors dealing with Illegal Wildlife Trade (IWT) Challenge Fund administration, monitoring and evaluation (working within relevant data protection rules).

Defra may be required to release information, including personal data and commercial information, on request under the Environmental Information Regulations 2004 or the Freedom of Information Act 2000. However, Defra will not permit any unwarranted breach of confidentiality nor will we act in contravention of our obligations under the Data Protection Act 1998. The Grantee shall assist and co-operate with the Department (at the Grantee's expense) to enable the Department to comply with its disclosure obligations under these enactments.

We may use information, including personal data, to test computer systems to ensure that they work effectively and efficiently and to develop new systems in order to improve efficiency and the service that we provide to you and other persons. Any use of information for testing or developing computerised systems will be conducted in a secure manner in accordance with the Data Protection Act 1998 to safeguard the privacy of the information that you have supplied.

Defra's Personal Information Charter, which gives details of your rights in respect of the handling of your personal data, is on the Defra section of Gov.uk. If you don't have access to the internet, please telephone the Defra helpline 08459 33 55 77 and ask to speak to the Data Protection Officer for a copy of the Information Charter.



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This publication is available at <a href="https://www.gov.uk/government/publications">www.gov.uk/government/publications</a>

Any enquiries regarding this publication should be sent to us at

IllegalWildlifeTrade@defra.gsi.gov.uk

www.gov.uk/defra