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also supporting a secure audit trail for aid delivery”.
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 Conversely, disproportionally
restrictive regulation and supervision of digital payment platforms can unnecessarily
limit human rights and hamper the delivery of humanitarian assistance carried out by
impartial humanitarian actors in a manner consistent with international humanitarian
law to those in greatest need, especially in conflict- or terrorism-affected areas that
lack banking or otherwise regulated financial services. Without adequate checks and
balances, including monitoring and oversight, overregulation of digital paymenx ̀25

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the physical disruption of cash movement and storage; criminal sanctions against
terrorists, facilitators and financiers; and non-conviction-based forfeiture against
terrorist-related entities. The peculiarities of each financing method, and the actors
involved, will then dictate the appropriate response.
22. In their efforts to effectively detect and disrupt the abuse of new technologies
for the purposes of terrorist financing, Member States should consider:
 (a) Developing multi-agency and, where applicable, multi-stakeholder
coordination mechanisms that include relevant policymakers, judiciary and law
enforcement authorities, financial investigation units, supervisory authorities and
regulators to exchange information and intelligence;
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 (b) Establishing frameworks and procedures for feedback mechanisms
between law enforcement, financial intelligence units and reporting entities from
relevant sectors to improve the quality of reports and financial intelligence products,
as well as to support trend monitoring and strategic analysis;
 (c) Developing and enhancing, in an ongoing manner, the capacity of relevant
national authorities to follow the money more effectively, including through parallel
financial investigations in terrorism cases, with the use of new analytical methods,
tools and technologies, as well as the requisite independent oversight and review
mechanisms. It is essential to continue to invest in technologies and training and
mobilize top experts as well as to invest in privacy-enhancing technology to protect
sensitive information;
 (d) Making optimal use of new and emerging financial and regulatory
technologies to contribute to the effective implementation of AML/CFT measures.
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