

# Guidance Note

27 FEBRUARY  
2024

CONFIDENTIAL - NOT FOR DISTRIBUTION

## ‘DO NO HARM’ & FINANCIAL TRANSFERS IN MYANMAR

---

### Background

In the three years since the February 2021 military coup in Myanmar, donors have worked to increase their flexibility, improve their conflict and context-sensitivity, and deliver faster, more impactful support to people in need throughout Myanmar. This has included the adoption of strategies for the delivery of financial support outside formal Myanmar banking channels, typically through reliance on informal value transfer systems more familiarly known as ‘hundis’. However, as time goes on, some ‘emergency exceptions’ expire, and donors tend to gradually revert to ‘business as usual’ practices of financial risk mitigation — at times without devoting sufficient attention to the considerable security risks these may generate for partners and beneficiaries.

While this ebb and flow of financial risk management has taken place on the donor side, many civil society organisations (CSOs) have fled across Myanmar’s borders to ensure the safety of their teams and the continuity of their operations. Others have remained inside Myanmar, often adopting low or zero visibility operating modalities — including by abandoning the use of heavily-monitored organisational bank accounts. At the same time, some CSOs have taken pains to walk a different and risky path of remaining ‘present’ — including, at times, by visibly adopting what SAC personnel might consider noncontroversial areas of programmatic focus — as a means to disguise the true nature of their work, for example, the delivery of emergency assistance to conflict-affected communities. These organisations work hard to maintain their life saving operations while shielding the true nature of their activities from the SAC under a cover of regime-palatable pretext. Although these CSOs and others may remain ‘present’ and officially registered, their security is precarious and their staff operate

at tremendous personal risk. For this reason, even for organisations that may maintain SAC registrations, physical offices and organisational bank accounts within Myanmar, actually relying upon such assets or allowing donors to access or draw attention to them can place the CSOs, their staff, and the communities that depend upon them at serious risk.

---

## Security Risks to Consider

Regardless of its registration status, access to 'official' bank accounts, or the apparent visibility of its operations, the Myanmar context is not a safe one for any CSO engaged in activities related to humanitarian response, the promotion of human rights, the transition to an inclusive and democratic Myanmar, or any other issue at odds with the values or agenda of the military regime. The SAC continues to monitor all financial transactions across the Myanmar banking system, with particular attention paid to international transfers and a high degree of scrutiny applied to the activities of civil society actors and all those suspected of opposing the coup. Meantime, SAC arrests of civil society actors continue at a scale that has not decreased since the coup. Disappearances, deaths, and severe abuse of those known or suspected to have been taken into SAC custody likewise continue at alarming rates. In this context, donors should avoid engagement with any financial transfer platform that could draw SAC attention or place their partners or beneficiaries at heightened risk of SAC interrogation or detention. To do otherwise could be to ignore fundamental principles of context- and conflict-sensitivity, as well as to risk subordinating the notion of 'do no harm' to that of financial risk management. These potential impacts could derail localization efforts, by effectively prioritising routine donor financial compliance above the physical security of highly vulnerable responders and communities in need in Myanmar.

---

## Final recommendations

- Donors should endeavour to preserve, extend, renew and continue to utilise all available measures to bypass the Myanmar banking system and should deliver financial support to Myanmar CSOs through whichever alternative channel each CSO considers best suited to its security and operational needs.
- Donors should continuously consult with partners to ensure: (1) donors maintain an up-to-date understanding of security risks and operational challenges partners and beneficiaries face; and, (2) partners understand and are able to make use of available flexibility measures whenever appropriate.
- Donors should routinely conduct internal reviews of financial and administrative compliance requirements and procedures, to ensure that these are fit for purpose and suited to realities that partners face.
- Donors should endeavour at all times to ensure partner and beneficiary security and adherence to the principle of 'do no harm' are prioritised above other operational concerns, including their own financial risk management.

---

## Guidance Note

Contributing information sources to this document include public and non-public humanitarian information. The content compiled is by no means exhaustive and does not necessarily reflect the position of its authors or funders. The provided information, assessment, and analysis are designated for humanitarian purposes only and as such should not be cited.

© 2024

**Contact:** [analyst.myanmar2020@gmail.com](mailto:analyst.myanmar2020@gmail.com)