

Guidance Note

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ETHICAL APPROACHES TO MYANMAR TPM

Background

As Myanmar nears the fourth anniversary of the February 2021 coup, response actors have now spent over three and a half years working in exceptional circumstances; as responders have navigated new, heightened and evolving risks to meet unprecedented needs, many international donors have worked with them to reduce, suspend and adapt programme monitoring requirements. At this point in the post-coup response, many donors are under mounting pressure from their respective headquarters and capitals to end all appearances of programming in a proverbial void and step up monitoring efforts to demonstrate more clearly where and how project funds are being spent, even as crises continue to grip Myanmar. As a result, third-party monitoring (TPM) is now increasingly being explored, as a means to convey programming impact and realities to donors without exacerbating the strain on their partners and sub-partners.¹

¹ This analytical unit, and its parent company, engage in TPM activities within Myanmar. This Guidance Note is not intended to promote or advertise any services; rather, as with all Guidance Notes, it intends to examine critical humanitarian issues and provide general recommendations to improve the humanitarian response in Myanmar. This Guidance Note is based on interviews and conversations with local and international responders in Myanmar; it aims to highlight critical aspects of TPM, and calls for all TPM actors to ensure they adopt a locally sensitive and ethical approach to TPM while remaining in line with international best practices.

Done well, TPM does far more than help donors meet compliance requirements with respect to documenting programme expenditures. From a partner perspective, perhaps the most important function of TPM is that it can serve as a localisation tool: third party monitors conduct periodic project site visits, conduct remote research and hold frequent discussions with project implementers, beneficiaries and other stakeholders. These activities help local responders and aid recipients to share the realities they face with the donors funding assistance efforts in their areas. In this respect, TPM can create an (almost) real-time feedback loop linking beneficiaries and responders to international donors closing the information gap between donors and those using and receiving their support in perilous and fluid environments. Equipped with a more timely, accurate picture of the ground realities across their programming areas, donors are better able to make necessary programme adjustments and act quickly to address challenges and anticipate changes. Moreover, as it is conducted by a third-party, TPM allows these partners and beneficiaries to pass up feedback they would be otherwise unwilling or unable to share directly themselves; it also grants donors a secondary layer of trust and accountability.

However, when TPM is done poorly, it can pose a serious threat to vulnerable actors living and working in fragile and high-risk environments. It can exacerbate stress levels and compound workloads of overburdened local responders. When done in a manner that is not perceived as being sensitive to local security concerns, it can imperil beneficiary security; equally dangerously, these perceptions can cause responders and people in need to believe that donors and implementers do not understand or care about the realities they face. These security concerns related to TPM, whether fully realised or perceived by stakeholders, can trigger serious consequences across programming areas, including in the rejection of international assistance by those who need it most. Once that trust has been lost, ‘TPM’ fails to gather information about programmes, and it no longer functions as a programme monitoring tool at all. Instead, failed or insensitive attempts at ‘TPM’ can constitute the outright reckless endangerment of vulnerable populations and can serve to constrict humanitarian space by building new barriers between those funding assistance and those who need it.

TPM Landscape

As the Myanmar response has transformed, evolved, and sought to localise in the wake of the 2021 coup, international actors have engaged in debate over whether TPM was even possible in Myanmar; TPM activities were almost entirely unknown in Myanmar prior to the 2021 coup, as the large majority of programming conducted in the country was directly implemented by UN agencies and INGOs. By now, that debate has been answered by a growing tally of TPM efforts already completed and currently underway, including by this analytical unit; TPM is indeed possible in Myanmar, and it is happening today.

Where it is done well, those undertaking TPM adopt an approach anchored in a great degree of trust building with local implementers and communities, and take care — and large amounts of time — to allow the local response actors being monitored to guide them through what is possible across each project implementation area. As data collection continues safely and respectfully in this manner over time, fears generally begin to abate that TPM actors will lead

to funding decreases, mistreat project or beneficiary data, or otherwise compound security risks facing vulnerable populations and implementers. As local responders (and by extension beneficiaries) grow more comfortable with TPM and trust takes hold, TPM actors tend to be able to expand the scope of their data collection, gathering more useful information more easily and more quickly. However, this, like all trust building exercises, takes time, effort and investment.

Essentially, like humanitarian programs themselves, TPM must be guided by principles of research ethics, the humanitarian imperative of ‘do no harm’; the best way to achieve this is to ensure an approach which is fundamentally grounded in local implementer and beneficiary safety as its top priority. And, for emphasis: the perception of security is as important as security itself. If beneficiaries and implementers believe that the monitoring will be conducted in a manner that causes them to think that they are at greater risk of receiving aid than rejecting it, they will reject the assistance; according to some cases cited by international responders, vulnerable persons have outright refused to accept international assistance in order to distance themselves from the real or perceived dangers of monitoring.

Response Implications

The current Myanmar TPM landscape is a tapestry of efforts marked by a large variation in approach, impact and efficacy. To ensure TPM supports response efforts and serves the interests of local responders and vulnerable populations, these wide gaps in approach must be considered. However, a series of best practices should guide all TPM efforts in Myanmar. To approach TPM in an ethical, responsible, and principled manner most likely to yield useful results and even provide donors and responders with data that can support their informed decision-making in real time, TPM actors in Myanmar should bear in mind a series of fundamental realities, which can help inform each stage of their TPM project design and implementation.

First, **all TPM efforts should be locally guided**; TPM actors should defer to local responders to learn what project information is possible and appropriate to share in each target location. TPM actors often attempt to dictate the terms of monitoring; this includes by announcing inflexible timelines, ‘spot checks’, or trying to conduct site visits without warning or consultation. In other contexts, this is often the norm, and these methods are used as an accountability mechanism. However, in Myanmar, these practices can do far more harm than good. Moreover, in some contexts in Myanmar, unknown individuals demanding beneficiary lists are often met with radio silence at best and abject fear at worst. **For TPM to work, local responders must guide what is possible, how implementation will work, and must be active contributors to the success of TPM missions.**

Next: **perception is reality. There is no such thing as an ‘invalid’ partner security concern; if partners express a concern, it is a real concern.** Whether viewed by TPM implementers as ‘real’ or ‘perceived’, all security concerns partners raise must be treated with the same degree of respect and caution. For example, TPM actors may consider the widespread fears expressed by local responders that TPM data collectors might sell, give or otherwise provide the SAC with access to beneficiary data to be wildly unfounded and disregarded. These risks

are almost certainly vastly overstated. However, ignoring, downplaying, or otherwise refusing to take such concerns seriously can trigger a range of harmful consequences, from partners' termination of cooperation with TPM, to termination of all involvement in internationally-funded response activities. For example, an insistence on photographing partners' beneficiary lists, aid distributions, or other project activities — and even requests to do so without first establishing a relationship of mutual trust and respect with responders — will often at a minimum lead to elevated partner wariness and a decrease in partner cooperation, even if there is an extremely low risk of such photographs or lists ever being seen by security actors.

Relatedly, TPM actors must bear in mind that **TPM is not as important as implementation — no data is so important that it could jeopardise response efforts or beneficiary well-being.** There is never any reason to try to force TPM respondents to answer a question if they do not want to; absolutely no question is worth frightening an at-risk responder or a highly vulnerable beneficiary. Questions deemed 'too sensitive' or met with silence should be skipped, and data collectors should be trained to understand these nuances; interviews that appear to make respondents uncomfortable must be ended at once. There is no donor issue that will be resolved immediately with a particular photo of a beneficiary list or a rice distribution, or a sensitive survey question; although such interviews and photographs can be and have been safely collected in Myanmar, they are in no way 'mission critical' to effective TPM. In fact, quite the opposite is true. Even if data collection places responders and beneficiaries in no 'actual' danger, if data collection leads anyone to believe their location and identity will be shared with the SAC or other local governance actors, then there is no valid reason to collect such data. In a context where one of the greatest risks to programming is that responders and potential beneficiaries will refuse assistance due to security fears, it is counterproductive to exacerbate local actors' fears or provide any fodder to the Myanmar local implementer rumour mill. Donors and TPM actors must bear in mind that people across Myanmar live with highly limited access to reliable information; often behaviour is far more influenced by what people believe to be true than by what is actually true. People who fear that sensitive photographs could trigger SAC targeting are more likely to suspend TPM cooperation as soon as such a photo is taken, rather than to wait to see if SAC targeting actually ensues.

Final recommendations

1. Prior to launching any TPM undertaking, all TPM data collectors and researchers should undergo training with respect to research ethics, the imperative to 'do no harm', and the prioritisation of locally led approaches. Emphasis should be placed on context, conflict, and gender and trauma sensitivity, and project managers should ensure that interview redlines are set early and respected throughout the TPM process.
2. TPM actors should take time — potentially large amounts of time — to strive to build relationships of mutual respect and understanding with local responders, deferring to local responders' preferences and addressing concerns as they arise. Failure to actively engage with and defer to local stakeholders from the beginning can establish TPM initiatives as undertakings driven by outsiders without regard to local realities. In turn, this can jeopardise the success of TPM and potentially endanger local actors.

3. TPM actors must devise realistic and context-appropriate timelines, in close consultation with local experts and with input from local partners. Cold emails attempting to impose unrealistic deadlines determined in a vacuum are likely to be met with silence and reduce the likelihood of partner cooperation in TPM.
4. TPM actors must treat all security concerns raised by local actors and beneficiaries as equal and valid, regardless of how TPM actors may view such concerns themselves.
5. TPM actors should remember that TPM is a powerful tool for localisation when done well, but a potential threat to beneficiary security and well-being when done poorly. There is no reason to scare respondents, overreach with data demands, or insist on the collection of any particular type of project documentation; no aspect of TPM or any other type of research is worth making vulnerable individuals feel even *more* unsafe.

Guidance Note

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Contact: analyst.myanmar2020@gmail.com