



ACCESS TO FINANCIAL SERVICES BY CIVIL SOCIETY ORGANISATIONS ON THE MOVE

Summary of survey results on challenges civil society organisations in exile or relocation face when applying for and using financial services

February 2025



CONTENT



INTRODUCTION

1. ABOUT THE SURVEY

1.1 Methodology and limitations

2. RESULTS

2.1 About the respondents

2.2 Organisation of work

2.3 Experiences with traditional banks

2.4 Issues with sending and receiving funds

2.5 Other financial services

3. KEY TAKEAWAYS AND WAYS FORWARD

ACKNOWLEDGEMENTS

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INTRODUCTION



European Center for
Not-for-Profit Law

At the European Center for Not-for-Profit Law (ECNL), we have been for over a decade supporting civil society groups (“CSOs”) working in restrictive environments who have had to change their way of operation or relocate because of significant risks to the safety, freedom, health, and life of their representatives due to engagement in human rights work (we also refer to them as working “in exile” or “involuntary relocation”). Throughout this time, the groups have been reporting increasing challenges in accessing financial services, including difficulties with opening bank accounts, transferring funds, or facing account closures.

To increase understanding of their needs and identify potential solutions, we have created a detailed survey mapping out experiences of civil society groups and associated individuals with traditional bank institutions as well as with alternative financial service providers, including online payment systems. In this report, we provide the key results from the survey related to the civil society groups, including the main types of challenges they experienced, and attempt to provide recommendations to change the status quo. In parallel, we will produce another report specifically focusing on banking experiences of individuals.

Are you a CSO working in exile or involuntarily relocation facing issues with access financial services?

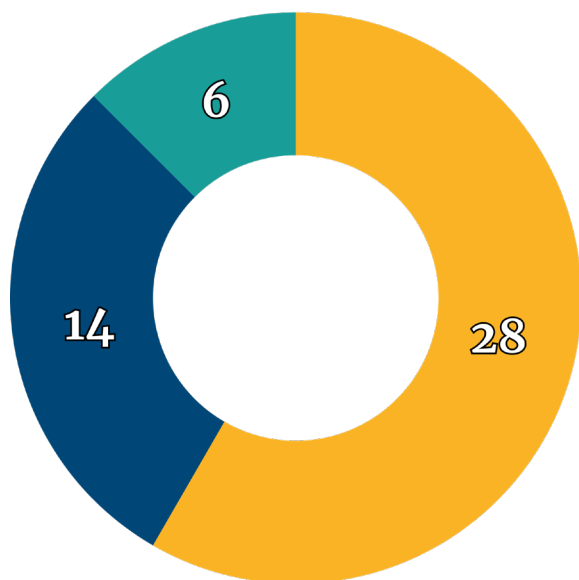
Share your story or learn more about how other groups overcame challenges with accessing financial services by contacting us at info@ecnl.org.

1.1 ABOUT THE SURVEY

Methodology and limitations



■ On behalf of a CSO ■ In personal capacity
■ On behalf of a CSO and in personal capacity



Graph 1. Capacity in which respondents filled out the survey.

ECNL created the survey consisting of 3 main areas:

1. Background information, mapping out the type of work the respondent engages in, when the reorganisation of work or relocation happened, and the current operational model of the organisation they represent or are associated with;
2. Experiences with traditional banking institutions and online banks; and
3. Experiences with other financial service providers, including online and offline payment systems.

Before launching the survey, we conducted several interviews with partners working with groups in exile and consulted the data collection method with a survey expert.

We disseminated the survey during the period of January to May 2024 through trusted networks set up by us and our partners. Our targeted respondents were:

- a representative of a CSO, either registered or operating without registration; and/or
- an activist/employee/volunteer associated with a CSO.

The survey was divided into two parts, the first focusing on the experiences of CSOs with organisational financial services and the second on experiences of individuals associated with a CSO with personal financial services. In this report, we analyse the 34 responses received from CSO representatives focussing on the organisational financial services.

1.1 ABOUT THE SURVEY

Methodology and limitations



Following the survey closure, we analysed our data and conducted a few follow up interviews. We identified following limitations of our methodology and results:

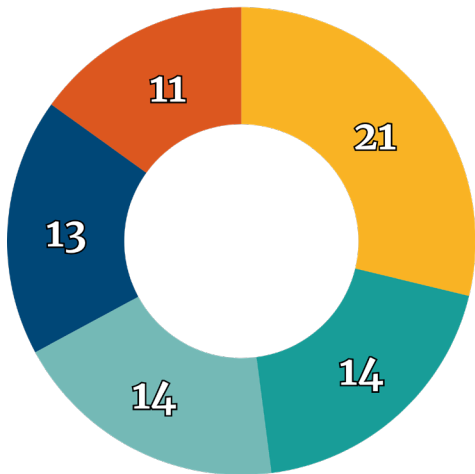
- With the survey, we aimed to collect experiences of groups working in sensitive contexts with difficult security situations. It proved challenging to collect enough responses to draw conclusions based on a representative sample of data, as many groups are reluctant to answer the survey due to the security concerns.
- Due to the sensitivity of the topic and in view of the security of the target group, we decided not to do a public outreach. Therefore, we were dependent on our network and networks of our partners to reach the exiles. We provided 5 language variations (Arabic, English, French, Russian and Spanish) to make it as accessible as possible, but we acknowledge that some groups were unable to respond in their native language.
- Our survey was designed to have as many multiple-choice questions as possible to save time of the groups when responding, allow for comparison across answers and obtain quantitative results. This may not always reflect the full reality of the respondents whose situation was more complex and could not be expressed in a survey. To mitigate this, we offered an option 'other' wherever it was relevant to allow for an alternative answer.
- The modes of operation of CSOs in relocation/exile and the related issues with accessing financial services are not always static and can change throughout the time. A CSO may relocate to one country and then decide to change the location again because of the same or similar reasons why they initially decided to relocate.

2.1 RESULTS

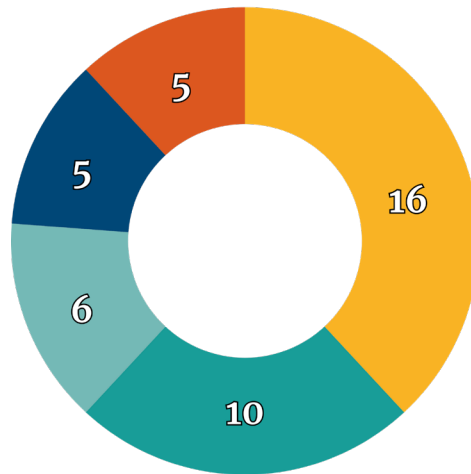
About the respondents



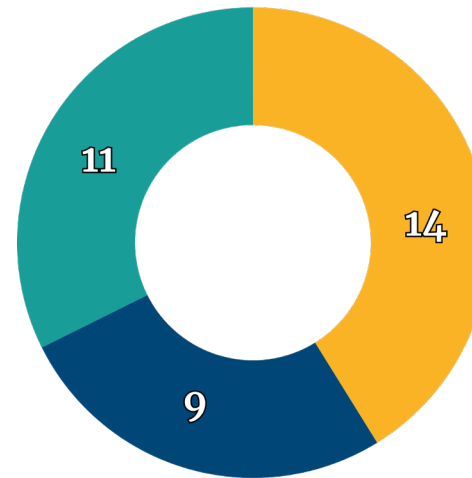
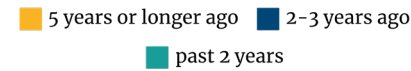
The CSO respondents are **working mainly in the areas of** general human rights, defense of democracy, women’s rights, civil society development and cultural rights.



Graph 2. The focus of CSO activities



Graph 3. Reasons for relocation/change in the mode of operation.



Graph 4. The period in which CSOs relocated to their new location or otherwise changed their mode of operation

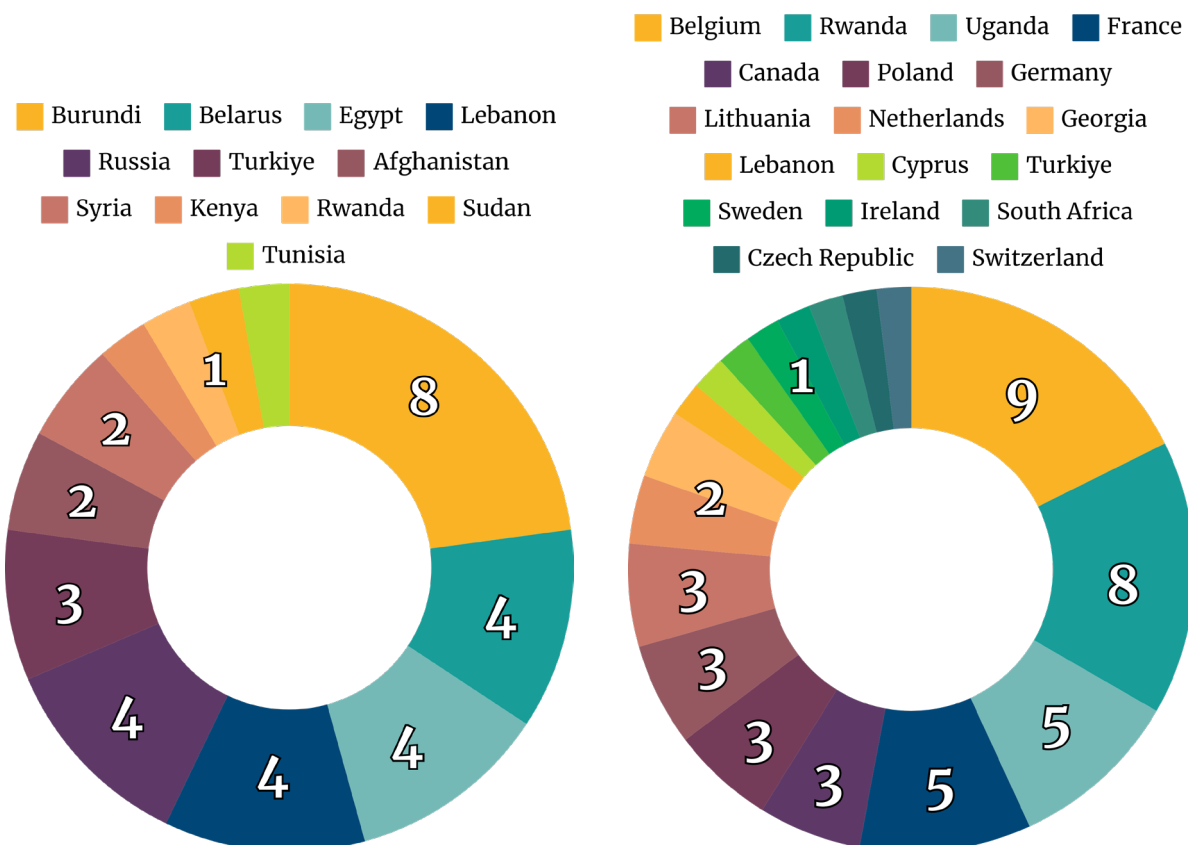
Their **reasons to change their way of work/relocate** varied, the most common ones being:

- **Personal safety reasons**, including threats and (political) persecutions,
- **Armed conflicts and security crisis** in the country of origin,
- **Legal restrictions affecting the organisation's operation**, including interrogations and excessive audits, restrictions on foreign funding or inability to obtain work permits for staff.

Regarding the **relocation timeline**, 41% of the respondents relocated 5 years or longer ago, 26% relocated 2 to 3 years ago and 32% relocated in the past 2 years.

2.1 RESULTS

About the respondents



Graph 5. The original country of registration/operation.

Graph 6. The new location.

A majority of CSO respondents were originally from Belarus, Burundi, Egypt, Lebanon and Russia. The most common new locations that CSOs selected were Belgium, Rwanda, Uganda and France.

Most of the CSOs from Central African countries, including Burundi and Rwanda, relocated, or otherwise changed their mode of operation, 5 or more years ago. In their answers, they indicated that this is a direct result of the political and human rights crisis that started in the region in April 2015. They mainly relocated to Rwanda, Uganda and Belgium. Many of these CSOs relocated to various locations.

CSOs that relocated from Eastern Europe (Belarus and Russia) moved or otherwise changed their mode of operation more recently (within the past 2 years or 2-3 years ago) due to political persecution and liquidation of their organisations. All CSO respondents from Russia moved in the past 2 years. They all moved to other Central and Eastern European countries, including Lithuania, Poland, Georgia, Czech republic and Germany.

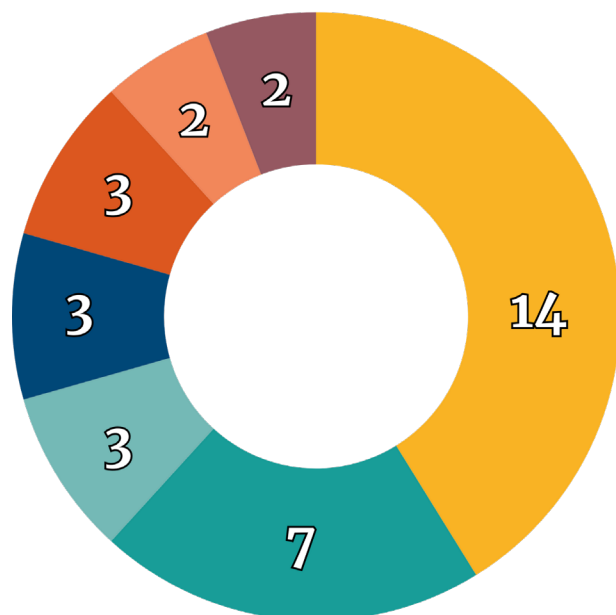
The relocation timeline is more diverse in the MENA region, including Egypt, Lebanon, Tunisia and Syria, where 3 CSOs relocated in the past 2 years, 4 CSOs relocated 2-3 years ago and 3 CSOs relocated over 5 years ago. The reasons to relocate are more often than in other regions linked to a lack of access to financial services in their original country. The majority of these CSOs relocated to Western European countries, among which France, Belgium and the Netherlands.

2.2 RESULTS

Organisation of work



- Other
- Deregistered in OC, registered in NC, staff in NC
- Registered in OC, unregistered in NC, staff in NC
- Registered in OC and NC, staff in NC
- Deregistered in OC, unregistered in NC, staff in OC
- Registered in OC and NC, staff in OC
- Deregistered in OC, unregistered in NC, staff in NC



Graph 7. Scenarios for organisation of work (OC=Original Country; NC=New Country).

One of the survey’s objectives was to map out the ways CSOs and activists in exile or involuntary relocation **change the way they operate**. **Seven respondents** indicated that they closed down a registered CSO or were forcefully deregistered in the original country and registered a new CSO in one or multiple new countries. **Three CSOs** indicated they kept the registered CSOs in the original country and relocated their staff and resources to a new country without registering a new organization there, while an equal number of CSO respondents kept registration in both original and the new country(ies). **Three CSOs** operate as an unregistered group in both the original and the new country.

As evident from the graph, the majority of the CSOs that responded to the survey indicated they relocated in a manner different from those that we identified and listed as options. While some of the scenarios described by the groups as “other” resembled the listed options with very limited nuances, a few CSOs followed different pathways. For some, the forceful **deregistration of their organisation by the state authorities in the original country led to a larger operational changes, with people leaving the organisation**. Four of the CSOs were never registered in the original country, mainly for political reasons, but some of their staff members relocated in time.

CSOs that decided to register a new entity following the relocation to another country reported **challenges with the registration procedure** (5 out of 12 respondents). These were all CSOs that relocated a registered CSO together with staff and resources from their original country to a new country or to multiple countries. These CSOs originated from Lebanon, Burundi, Türkiye, Belarus and Russia and relocated to Belgium, Rwanda, France (5 or more years ago), Georgia (2 to 3 years ago) and Czech Republic (within the last 2 years).

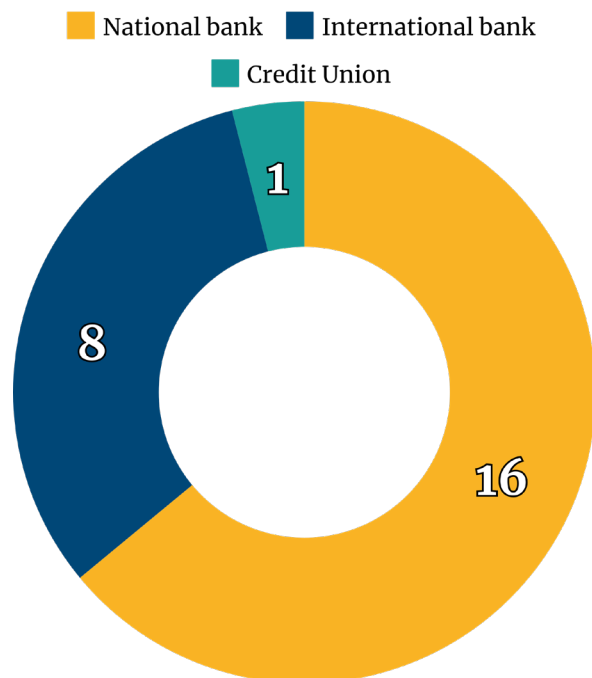
2.3 RESULTS

Experiences with traditional banks

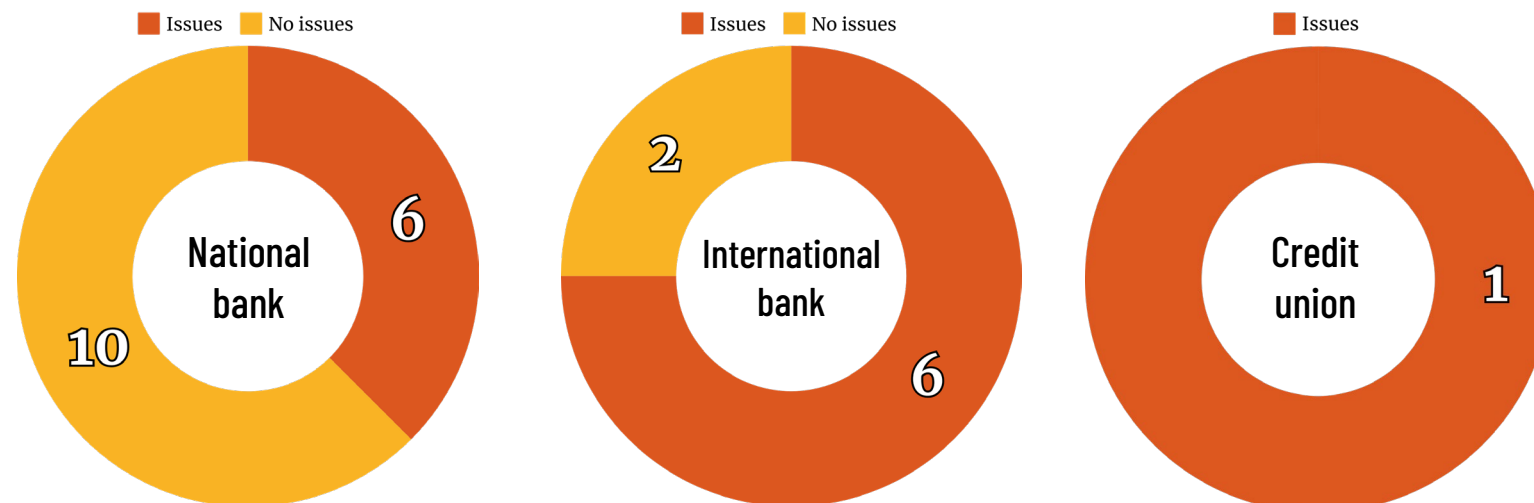


From the CSO respondents, 74% reported that they attempted to open a bank account. **More than half of these CSOs (52%) reported having issues with this process.** All respondents attempted to open an account with a traditional bank (none reported having tried an online bank), with 64% approaching a national bank, 32% an international bank, and 4% a credit union (see graph 8).

- **National bank:** 38 % of CSOs experienced issues trying to open a bank account.
- **International bank:** 75% experienced issues trying to open a bank account.
- **Credit union:** only one CSO attempted to open a credit account, they did face issues.



Graph 8. Type of bank account CSOs attempted to open.



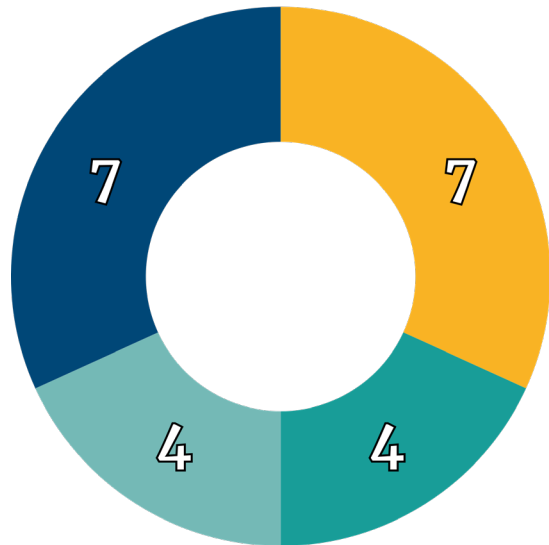
Graph 9. Number of CSOs who experienced issues when opening an account at a national bank, international bank and a credit union.

2.3 RESULTS

Issues with opening a bank account

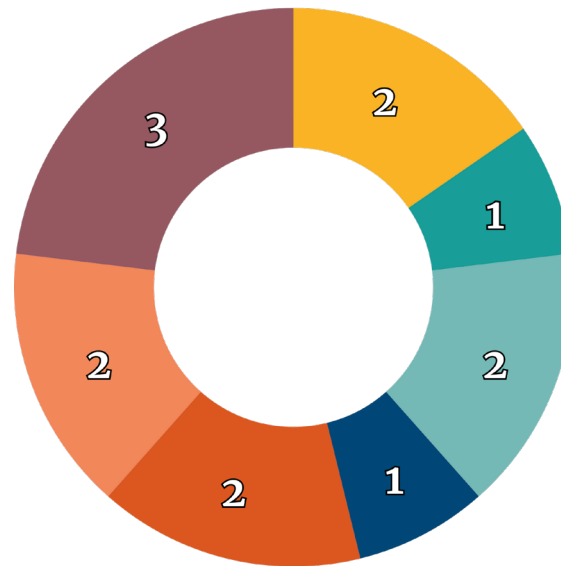


- Eligibility requirements
- Requirement to be physically present at the ba...
- Requested documents
- Procedural and administrative issues



Graph 10. Most common challenges CSOs faced when opening a bank account.

- Less than 2 weeks
- 2 weeks - 3 months
- 3 - 6 months
- 6 - 9 months
- 1 - 2 years
- no answer
- not able to open an account



Graph 11. Time it took to resolve issues to open a bank account.

On the following pages, we will present the most common issues that respondents reported in relation to opening a bank account. They are divided into four categories:

1. Issues related to the **eligibility requirements**
2. **Procedural and administrative issues**
3. Issues connected with a **requirement of physical presence at the bank**
4. Issues related to the **documents requested to open the bank account**

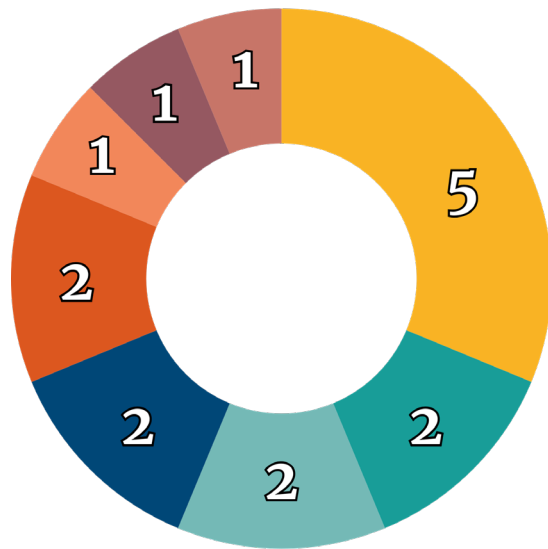
Out of the CSOs that experienced challenges with opening a bank account, 77% of them were in the end able to open a bank account. Overcoming their challenges took from one week to over a year. Of the remaining CSOs unable to open a bank account, only 1 was provided with a reason for rejection: they operated as an unregistered group in the country of relocation.

2.3.1 RESULTS

Eligibility requirements



- Registration
- Proof of residency representatives
- Activities or stronger presence in country
- Country of citizenship representatives
- Concerns about origin or use of funds
- Other aspects of due diligence
- Country of activities high-risk
- Citizenship in country required



Graph 12. Challenges related to eligibility requirements.

Out of the CSO respondents who attempted to open a bank account, 28% experienced issues with the eligibility requirements. Often, the respondents indicated that they experienced multiple issues related to eligibility requirements:

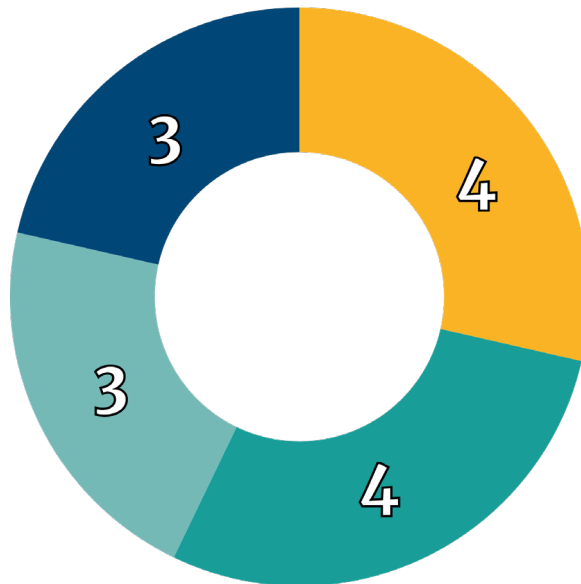
- **Registration:** 5 CSOs reported that they were required to be registered in the new country in order to open a bank account.
- **Citizenship or proof of residency:** 3 CSOs indicated that they were required to have a citizenship or a proof of residency in the new country for at least one of the CSOs representatives.
- **Origin of funds considered “high-risk”:** 2 CSOs experienced issues with opening a bank account because of the origin of their funds was considered high-risk. This was the case for a CSO originally from Türkiye that moved to Belgium, and a CSO originally from Lebanon that moved to Cyprus.
- **Country of citizenship on the sanctions’ list:** 3 CSOs had issues with opening an account because the country of citizenship of at least one of the CSO representatives or office holders was on the sanctions’ list or deemed high risk. These 3 CSOs were from Türkiye, Lebanon and Russia and they all moved to the EU member states.

2.3.2 RESULTS

Procedural and administrative issues



- Delays in responding by the bank
- Limited or no options for accounts for CSOs
- Insufficient guidance in the process
- Lack of information about the process



Graph 13. Challenges related to procedural and administrative issues.

28% of the CSOs who attempted to open a bank account reported procedural issues. This was mainly the case for CSOs opening bank accounts in France (3 CSOs) and Belgium (3 CSOs). The challenges they faced were:

- **Procedural delays and no accounts for organisations not generating profit:** The two most common issues that CSOs reported were delays in responding by the bank and limited or no options of bank accounts offered for CSOs.
- **Lack of guidance:** Also, 12% of CSOs who attempted to open a bank account indicated that they lacked guidance or information from the bank.
- **Lack of information about the process:** Similarly to the previous point, multiple respondents also indicated that the banks offered only limited guidance/information about the process, including the due diligence requirements.

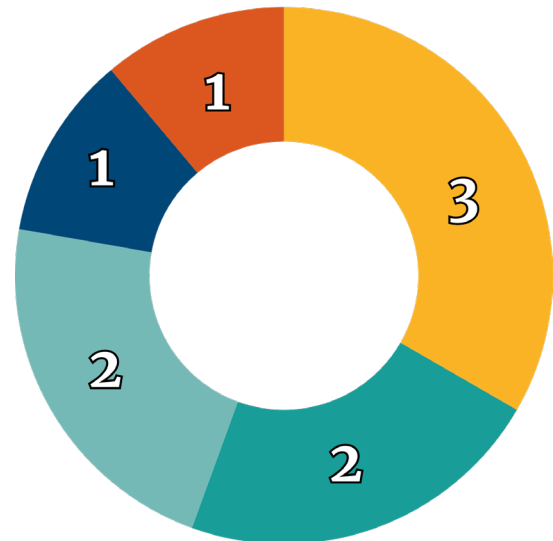
Although all CSOs with procedural and administrative issues were eventually able to open a bank account, 71% of them reported that it took them 6 months or longer to complete the process. This likely had a major impact on conducting their activities and ability to pay the salaries.

2.3.3 RESULTS

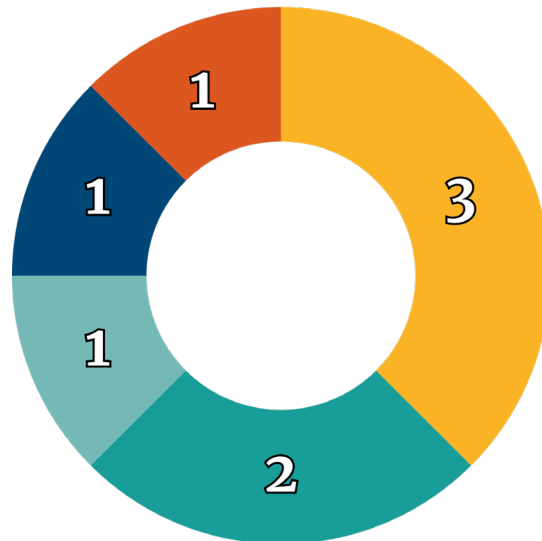
Physical presence at the bank and requested documents



- Requesting multiple in person visits
- Difficulty in securing an appointment
- Requesting multiple people present at same ti...
- Requesting physical presence of representatives
- Rejecting legally accepted substitution



- Requesting CSO docs that do not exist in OC
- Requesting burdensome number of documents
- Delays in receiving documents from OC
- Requesting unavailable personal documents
- Requesting unavailable organisational docs



Graph 14. Challenges related to physical presence at the bank.

Graph 15. Challenges related to documents requested to open the bank account.

A common issue for CSOs working in restrictive environments is travelling or providing documents from their country of origin that might be unavailable. In this regard, CSOs reported the following challenges:

- **Physical presence at the bank:** 16% of the CSOs that attempted to open a bank account experienced issues with the banks requesting physical presence to open an account or to verify their identity. Additionally, 3 respondents indicated that multiple in person visits of CSO representatives who were not in the country were required and 2 respondents mentioned that the bank requested multiple CSO representatives to come physically to the bank in order to open a bank account..
- **Unavailable documents:** 16% of the CSOs that attempted to open a bank account experienced issues with providing the documents that were requested by the bank. In 75% of the cases, the bank requested documents that did not exist in their country of origin.

Out of the CSOs that were requested to come in person to the bank, 2 were not able to eventually open a bank account. From the CSOs reporting challenges with the requested documentation, 1 CSO was not able to eventually open a bank account, but since this CSO reported also other challenges, including with the eligibility requirements, it is unclear whether the final rejection was due to the lack of supporting documentation or if other causes played a major role in the bank's decision.

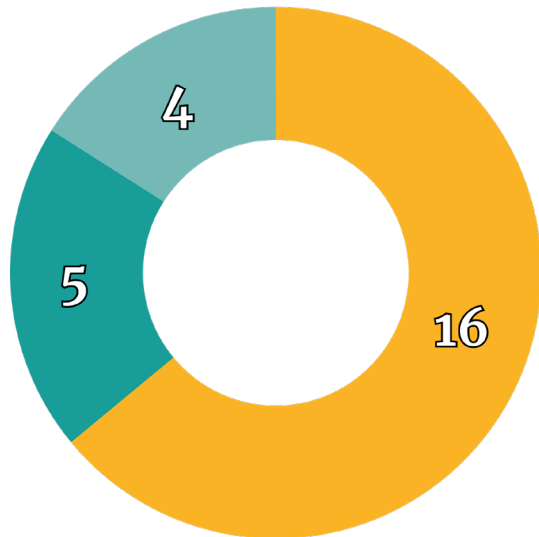
2.4 RESULTS

Issues with sending and receiving funds

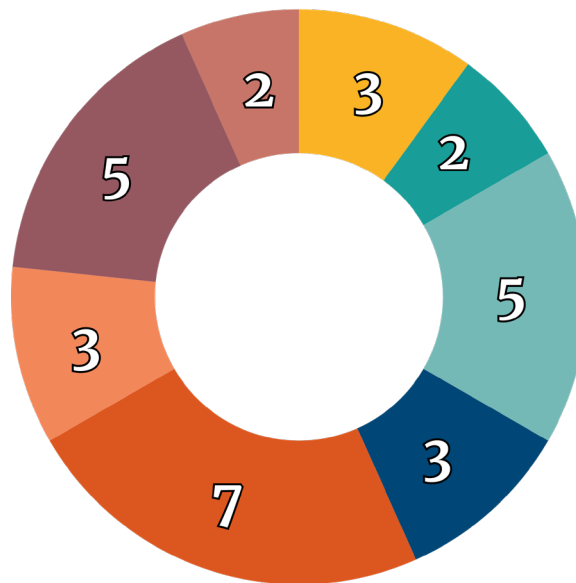


- Delays in transfer (our bank)
- Delays in transfer (recipient's bank)
- Blocking transfer (our bank)
- Blocking transfer (recipient's bank)
- Requesting additional info/docs (our bank)
- Requesting additional info/docs (recipient's bank)
- Issues with correspondent or intermediary bank
- Other

- No issues
- Issues with sending and receiving funds
- Issues with sending funds



Graph 16. Number of CSOs that experienced issues with sending or receiving funds.



Graph 17. Issues for CSOs experienced when sending funds.

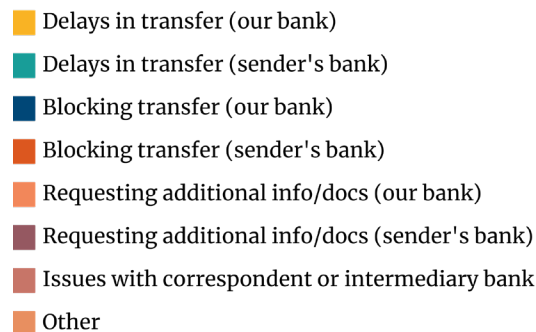
From the CSOs that were able to open a bank account, **36% experienced issues with sending and/or receiving funds.** The main challenges with sending funds included:

- **Requesting additional information:** Most commonly, the respondents were requested by their bank to provide additional information or documents related to the transfer. Several CSOs also reported that the recipient's bank was requesting additional information or documents.
- **Blocking transfers:** CSOs respondents also reported blocking of transfers from both the sender and recipient's side.
- Other reported challenges included **delays in transfer and issues with correspondent or intermediary bank.**

78% of the CSOs who had challenges with sending (and receiving) funds, previously also had issues with setting up a bank account.

2.4 RESULTS

Issues with sending and receiving funds



Graph 18. Issues experienced by CSOs when receiving funds.

Quite unsurprisingly, **55% of the CSOs that experienced issues with sending funds also experienced issues with receiving funds.** When receiving funds, CSOs most commonly encountered the following issues:

- **Requests for additional information or documents.** These requests were coming both from the respondents' banks as well as from the recipients' banks;
- **Blocking or delaying of transfers by the CSO's bank.** One respondent had similar issues also with the recipient's bank.
- **Receiving additional requests from the correspondent or intermediary bank.**

About half of the CSOs that experienced challenges with sending and receiving funds, were **provided with reasons for their challenges.** Most commonly, the banks considered the sender or receiver to be a **“risky entity”**, or the **countries** where they operate were **considered “high risk”** or were **on sanctions lists.** As a result, respondents were unable to reach field workers, contractors or staff members and pay their salaries or fees to perform their work. One respondent mentioned that their bank account was **closed specifically as a result of such transfers.**

When asked about other issues related to the use of banking services, several CSOs indicated they had **challenges with money withdrawals.** Some of them also reported issues with paying the staff salaries because of the **staff members' issues with accessing personal banking.** We explore the issues with accessing personal banking services of individual activists in a separate document.

2.5 RESULTS

Other financial services

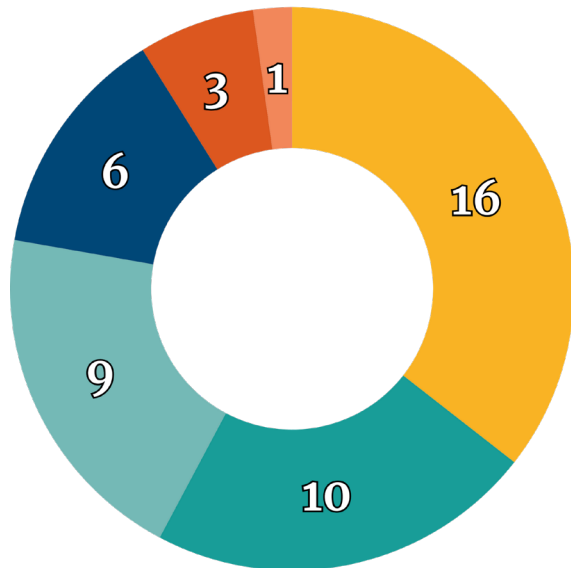
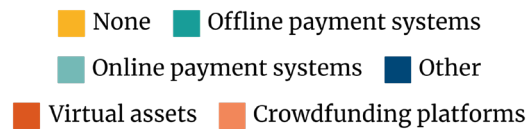


More than half of the CSO respondents used other financial services than banking services to access, transfer and receive funds. We divided these services into the following categories:

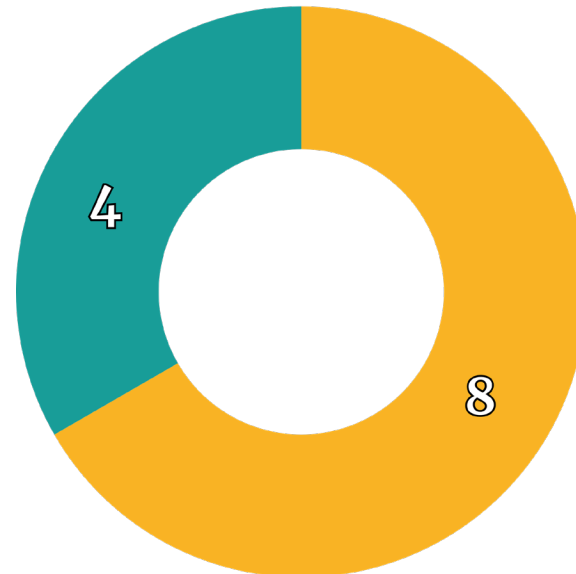
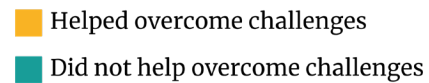
- Online payment systems using traditional currencies, including cross-border payment systems such as Wise or PayPal,
- Transfers of virtual assets, including NFTs, cryptocurrencies etc.,
- Offline payment systems, including Western Union or Money Gram,
- Crowdfunding platforms,
- Other.

Following are some of interesting trends observed throughout the responses:

- Most commonly, CSOs reported using **online and offline payment systems**
- The CSOs responding “other”, used phone transfers, partner organisations (fiscal hosts) or personal accounts to receive and transfer funds.
- Of the CSOs turning to other financial services, 67% used these solutions to overcome challenges with regular banking services. **And in 67% of the cases, these services helped them overcome the challenges experienced with banking.**



Graph 19. The other financial services used by CSOs.



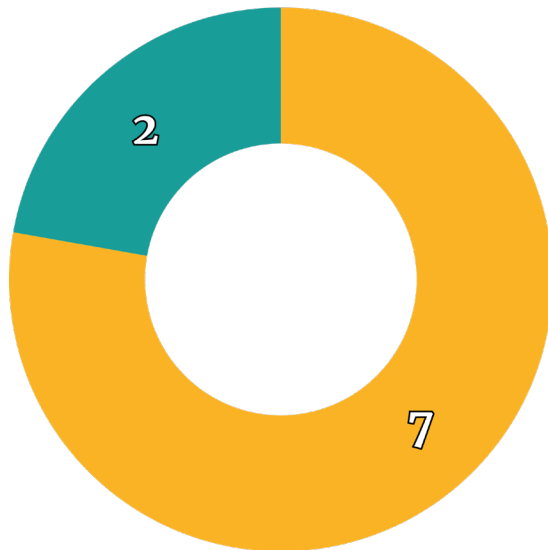
Graph 20. Whether the other financial services helped them to overcome challenges.

2.5 RESULTS

Other financial services – advantages and disadvantages

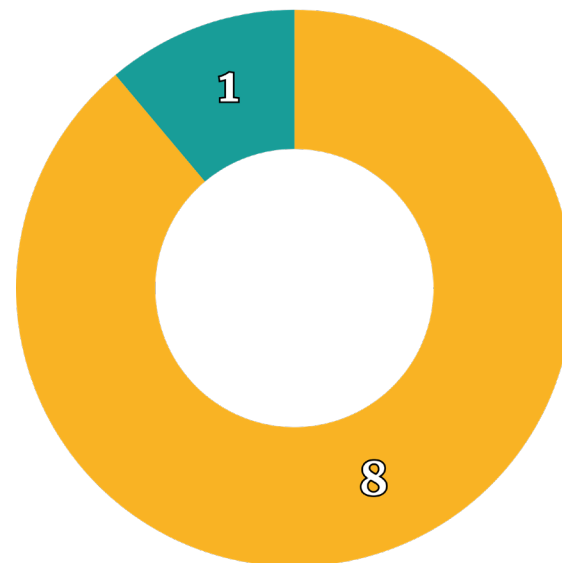


Did not experience issues opening an account
Experienced issues opening an account



Graph 23. Number of CSOs that used online payment systems and experienced issues with opening an account.

Did not experience issues transferring funds
Experienced issues transferring funds



Graph 24. Number of CSOs that used online payment systems and experienced issues with transferring funds.

- Based on the responses, using other financial services enabled CSOs to make **quicker and cheaper transfers** while trying to open a bank account.
- Two CSOs indicated they used other financial services **due to donor preference** and one reported that other financial service providers are **more flexible** when it comes to transferring funds to countries considered riskier by the banks.
- From the CSOs that used other financial services, **only 2 reported issues with opening an account with an online payment system**. These issues were mainly of **procedural and administrative nature**, with the lack of guidance provided by the financial service provider as well as **technical issues** with the platform used for the provision of financial service. One CSO experienced issues with the eligibility requirements due to the lack of registration.
- One of these two CSOs also experienced issues with transferring funds, citing blocked transfers and delays in executing the transfers by the financial service provider.

3. Key takeaways and ways forward



These are the key takeaways from the presented results of the mapping:

1. Despite the extremely difficult contexts they work in, CSOs working in restrictive environments show **creativity in finding their ways to continue pursuing their mission**. The changes in the modes of operation **extend beyond the relocation** of all staff and resources to a new country and often **involve complex hybrid models**, with various implications on their ability to access financial services.
2. When operating in such complex contexts, CSOs experience **significant issues with opening bank accounts**. **52% of the respondents attempting to open a regular bank account encountered challenges with this process**. The main challenges were related to the eligibility requirements and burdensome procedural and administrative processes.
3. CSOs working in restrictive contexts are often **unable to send or receive funds**, preventing them from paying their bills and staff salaries. From the CSO respondents that were able to open a bank account, **36% experienced issues with sending and/or receiving funds**. Most commonly, they have received requests to provide additional documentation and information, which **caused delays** in the transfer. Several CSOs indicated that their transfers were **blocked**.
4. **Other financial services provided more flexibility to CSOs** and helped in many cases with **faster and cheaper transactions**, although challenges remained for some CSOs. Of the CSOs turning to other financial services, **67% indicated that they were able to overcome the challenges experienced with regular banking services**.

3. Key takeaways and ways forward



Based on the takeaways, the following action points are essential to support CSOs working in restrictive environments access financial services:

1. **Map out hybrid models of work and their implications** for banking and other financial services to support CSOs in navigating complexities of working from different locations.
2. **Launch a dialogue between the key stakeholders**, including decision-makers, bank associations and CSOs to find long-term structural solutions to issues CSOs are facing with accessing financial services, including with transfers to conflict areas or countries considered to be "high risk."
3. **Work with bank associations as well as individual banks** to raise awareness of the specific challenges that CSOs in involuntary relocation/exile experience. In dialogue with banks, find ways for adjusting the administrative procedures and eligibility requirements for opening a bank account to reflect the CSO realities, including their inability to travel or produce documents that do not exist in their country of origin.
4. **Map out key financial service providers outside of the standard banking institutions** and their main advantages and disadvantages to provide CSOs working in restrictive environments with short-term solutions to access funds and pay their bills.



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