Annex A:



Additional Information on SWIA Methodology

A. SWIA Phases

The SWIA process follows well-established impact assessment steps. For each step of the process specific tools or approaches have been developed, which are described below. 678



Table 43: SWIA Phases

I. Screening

Objective: Select economic sectors for a SWIA based on several criteria:

- the importance of the sector to the Myanmar economy
- the complexity and scale of human rights risks involved in the sector
- the diversity of potential impacts looking across the sectors
- human development potential
- geographical area

Tasks:

 Informal consultations were held inside and outside Myanmar to develop and verify the selection of sectors.

Key Outputs / Tools

Selection of 4
sectors for SWIA:
Oil & Gas
(published Sept.
2014), Tourism
(published Feb.
2015), ICT
(published Sept.
2015) and
Agriculture
(subsequently
changed to Mining
– forthcoming)

II. Scoping the ICT sector in Myanmar

Objective: Develop foundational knowledge base to target field research for validation and deepening of data collection.

Tasks:

- Commission expert background papers on: the ICT sector; the legal framework; land and labour issues
- Stakeholder mapping

III. Identification and Assessment of Impacts

Objective: Validate foundational knowledge base with primary data collected through field research from targeted locations across Myanmar.

Tasks:

■ Four rounds of field team visits to three different locations

Key Outputs / Tools

- Scoping papers
- SWIA work plan

Key Outputs / Tools

- Questionnaires
- Internal fact sheets on various business and

 $^{^{678}}$ This table has been gratefully adapted from the presentation used in Kuoni's HRIA of the tourism sector in Kenya.



each time collecting qualitative data from:

- Communities potentially affected by ICT operations, covering issues including: ICT use; Livelihoods; Consultation; Land use; Environment; Labour; Migration; Children; Gender; Security; Indigenous Peoples/Ethnic Peoples.
- Managers of ICT companies, covering issues including: Customer/user privacy and security (including lawful interception and surveillance); Freedom of expression (including censorship and hate speech); Working Conditions; Community impacts (including land use).
- Employees and workers of ICT companies, covering issues including: Working conditions; Health and safety of workers.
- External stakeholders, covering issues including: The impacts of ICT operations for local or national authorities, NGOs and CSOs, international organisations, journalists, political parties, schools and monasteries.
- Compile and synthesise field data, including IHRB/DIHR trips to debrief with research teams in Yangon
- Further desk research

IV. Mitigation and Impact Management

Objective: Identify measures that will help avoid, minimise, and mitigate potential impacts of the sector.

Tasks:

Synthesise information on potential impacts at the three levels: sector, cumulative and project in order to identify considerations for companies and Government to prevent or mitigate potential impacts

V. Consultation & Finalisation of the SWIA Report

Objective: Present SWIA findings and conclusions, as well as recommendations to be validated through consultations with representatives of Myanmar Government, ICT companies operating/planning to operate in Myanmar, and representatives of civil society organisations, some of whom represent those affected by ICT operations in Myanmar, trade unions, international organisations, donor governments.

Tasks:

- Iterative drafting of main SWIA chapters
- Translations for consultations
- Consultations in Yangon, Naypyitaw and Europe
- Revisions to draft SWIA
- Finalisation, publication and dissemination of the ICT SWIA

human rights issues in Myanmar

- Ethical research policy
- Field safety guidelines
- Interview summaries
- Reports of stakeholders consulted

Key Outputs / Tools

 Initial synthesis reports of field findings

Key Outputs / Tools

- Draft SWIA report in English and Burmese
- Slide pack summarising the SWIA findings for consultation
- Consultation report
- Final ICT SWIA report and dissemination

B. What is Different about a SWIA compared to a Project Level Impact Assessment

■ Wider audience: A project-level environmental, social or other impact assessment is typically carried out by or for an ICT company to fulfill a regulatory requirement as a



- step in gaining permission to operate. SWIA are intended for a much wider audience: Government and Parliamentarians, business, local communities, civil society, and workers and trade unions.
- Aims to shape policy, law and projects: SWIA look at the national context, national frameworks, legal contracts (where available) and business practices, and identifies what actions will help shape or impede better human rights outcomes for the sector. The findings inform the analysis and recommendations at the core of the SWIA for a range of audiences.
- Information goes into the public domain: Company-led human rights impact assessments (HRIA) are typically confidential, and environmental or social impact assessments may be also unless disclosure is required. The whole rationale behind the SWIA is to make the document a public good for the purpose of informing and thereby improving practices and outcome of business investment.
- Looks at 3 Levels of Analysis: The SWIA looks at the impacts of the sector and to do this uses three levels of analysis: sector, operational and cumulative levels.
- Does not replace the need for an individual human rights and/or environmental and social impact assessment by a company: The SWIA does not replace the need for an operational-level impact assessment where required or desirable. Instead the SWIA helps *inform* a company's assessment, as it gives an indication of the kinds of human rights impacts that have arisen in the past in the sector. This helps to forecast what future impacts may be. A SWIA may be particularly relevant at the scoping stage of a company's operations. The SWIA also alerts to potential legacy issues that incoming operations may face. Such assessments will have to examine the specific situation of the forthcoming project within the particular local context and in doing so, may also uncover new potential impacts that were not picked up in the SWIA. It is therefore not a checklist, but a guide for considerations in subsequent impact assessments.
- Does not replace the need for conflict risk assessments: Given the history of conflict in certain areas of the country, companies operating in those areas might want to carry out specific conflict risk assessments covering the areas in which they plan to operate. The limited number of people interviewed and places visited within the framework of this SWIA is not sufficient to develop a comprehensive analysis of drivers of conflict. However, such a limitation is inevitable in the rationale for the SWIA, which cannot expect to get this level of detail across the country. Furthermore, the types of interviewees would need to be expanded in order to more effectively capture conflict impacts, including conflict experts, ethnic armed group and community leaders.
- Takes a broad view of what a human rights impact includes. As HRIA methodology evolves, there has been an accompanying discussion about what distinguishes a human rights impact from other types of social impacts in particular. The SWIA takes a broad view of what constitutes a human rights impact, as there are a wide variety of actions that can ultimately result in human rights impacts and because it is intended to support an approach to responsible business conduct in the country which will require addressing all these issues.
- Takes a practical view on distinguishing different types of impact assessments. In certain industry sectors (such as extractives), environmental and social impact assessments (ESIA) are often a routine requirement. This has led to global discussion about what distinguishes an SIA from an HRIA, potentially diverting attention from getting on with the process of assessing and addressing potential impacts. The approach taken in this SWIA is that the labels that are given to the process are less important than getting the process and the content covered in a manner that is compatible with human rights much depends on the quality of the ESIA/SIA. A good



- quality ESIA/SIA comes close to addressing many human rights issues but may not pay sufficient attention to civil and political rights, and in considering risks to human rights defenders, which can be relevant to extractive projects.⁶⁷⁹ See Table 44 below.
- Does not establish a baseline but instead describes the situation for the sector at a moment in time. The SWIA does not purport to set out a baseline of conditions at the project level; this is a task for operator's project-level ESIA. Chapter 3 on Sector Level Impacts, and the national context discussions at the beginning of each of the ten parts of Chapter 4 on Operational-Level Impacts and at the beginning of Chapter 5 on Cumulative-Level impacts, sets out the current context around the enjoyment of human rights at the national level, and gives some indication regarding future trends as well as particular areas that are high-risk based on past in-country experiences.
- Would provide relevant information for a sector master plan or strategic impact assessment. While these have not been used to date in Myanmar, the Government is in the process of revising at least three ICT related Master Plans.

Table 44: Six Key Criteria for Assessing Human Rights Impacts

In order to adequately assess human rights impacts, the impact assessment process and content should reflect the six criteria listed below⁶⁸⁰

Standards

The impact assessment needs to be based on international human rights standards. Human rights constitute a set of standards and principles that have been developed by the international community. This establishes an objective benchmark for impact identification, severity assessment, mitigation and remedy.

Scope

The scope of an assessment should include actual and potential human rights impacts caused or contributed to by a company, including cumulative impacts, as well as impacts directly linked to a project through business relationships such as with contractors, suppliers, JV partners, and government and non-government entities.

Process and engagement

The impact assessment, including associated engagement and consultation activities, should apply the human rights principles of participation, non-discrimination, empowerment, transparency and accountability. This promotes attention to process, not just outcome, and can help to create "buy-in" in the impact assessment among relevant stakeholders. Inclusive engagement throughout the impact assessment process is a key component, in a manner that is gender sensitive and takes into account the needs of vulnerable individuals and groups, providing capacity building or assistance where needed to promote their meaningful participation.

Assessing and addressing impacts

Impacts should be assessed according to the severity of their human rights consequences. This means including the assessment criteria of scope, scale and ability to remedy the impact, and taking into account the views of rights-holders

⁶⁷⁹ See: OHCHR, "Report of the Special Rapporteur on the situation of human rights defenders, Margaret Sekaggya", A/HRC/19/55 (2011), sections III & IV.

⁶⁸⁰ Developed by the Danish Institute for Human Rights.



and/or their legitimate representatives in determining impact severity. Addressing identified impacts should follow the standard mitigation hierarchy of "avoid-reduce-mitigate-remedy". Where it is necessary to prioritise actions to address impacts, severity of human rights consequences should be the core criterion.

Accountability and transparency

The impact assessment should consider the differentiated but complementary duties and responsibilities of government and non-government responsible parties for addressing identified impacts. For company responsibilities, this would include assigning to relevant staff members actions to avoid, mitigate and remedy impacts. The impact assessment and its associated communications should be transparent and provide for effective ways for rights-holders to hold the responsible parties to account for how impacts are identified, prevented, mitigated and/or remedied.

Interrelated impacts

Identification and management of impacts should take into account the interrelatedness of various environmental, social and human rights impacts. For example, depleting a community water supply will have an impact on the right to water, but may also have interrelated impacts on the right to education of children who may need to walk longer distances to collect water and are therefore less able to attend school.

C. Limitations of the ICT SWIA

- Non-attribution: The team made a decision not to attribute practices, good or bad, to particular places, companies, or individuals and therefore have not listed specific stakeholders engaged during the research. The SWIA uses existing experiences to identify opportunities to improve new and existing projects in the sector.
- Thirteen locations in six States/Regions visited: The ICT SWIA field research focused on six States/Regions where ICT operations are underway and that are representative of a range of ICT contexts in Myanmar: urban and rural ICT usage; tower rollout in urban, rural and conflict affected areas; ICT parks and facilities; internet cafes and phone and SIM shops in urban and rural settings; amongst others. While this does not include all areas where current or future ICT operations are taking place, the SWIA's Recommendations are representative enough to be generally applicable to existing and future ICT operations in Myanmar that are not in conflict. The findings highlight trends seen across the six research locations and are therefore not meant to provide detailed analysis of particular types of projects or regions.
- "Online" and "Offline" focus: This SWIA for the ICT sector looks at both "online" human rights risks (such as impacts to freedom of expression and privacy from ICT use) and "offline" human rights risks (such as labour rights impacts from tower or fiber line construction, or livelihoods impacts of communities). The ICT SWIA does not consider ICT manufacturing and production impacts in detail as such activities were fairly limited in Myanmar at the time of preparation of the Report (i.e. 2014/15).
- Existing, not planned, operations: It was specifically decided to do the field research in locations with existing ICT operations, rather than prospective areas for rollout or other ICT activities. Given the tensions that have surrounded some industrial projects to date in Myanmar, there was a concern that asking about potential projects in certain areas (without knowing whether projects would actually materialise) might create concerns in communities and potentially build expectations (good or bad) that were not fulfilled. In addition, given the inexperience of many Myanmar communities



with being able to express their concerns publicly, the relative lack of experience with ICT or other technical operations in the country to date, the project team decided that research with communities that had experience with nearby ICT projects would be able to provide more relevant data for the research. In addition, as Government permission was needed to carry out the research and given sensitivities surrounding the other sectors, it was considered more likely that Government permission would be granted to review existing rather than prospective projects.

- Rapidly changing dynamics: A challenge of conducting a SWIA in Myanmar is that the country continues to undergo rapid social, economic, political and regulatory change. As a result, past experiences, both positive and negative, may not always be relevant to future operations. Examples of good practice from the previous era where companies would rightly try to insulate themselves from interaction with the Government are far less likely to be appropriate in a new era of openness. Prompting the Government to support responsible business approaches may be a more appropriate approach.
- Conflict expertise: The interviewers were experienced social science researchers but did not have sufficient experience or training in questions of diversity and exclusion to sufficiently explore ethnic grievances and the dynamics of conflict (both armed conflict and inter-communal violence). Given Myanmar's recent history, addressing this would require very careful selection and intensive training of interviewers, and even then there would likely be remaining limitations with gathering all required information through qualitative information.
- Limitations due to lack of permission: In some instances no permission was granted to speak to workers of ICT companies or to community members, or permission was delayed, which resulted in limited time in order to conduct interviews. However generally both the authorities and most companies have been collaborative and open to granting access to the SWIA field teams and to sharing information.
- Access limitations: While the SWIA field teams tried to conduct workers' interviews outside of their workplaces and without the presence of management, this was not always possible. This may have led to different interview responses than if interviews were confidential.

D. Field Research Methodology & Interviews



Field Research Methodology

The ICT SWIA is comprised of both primary and secondary research. For the primary research, teams of two researchers (plus a local facilitator, translator and driver as needed) visited thirteen different locations over four different field trips (see location map below).

The field teams used qualitative research methods that were adapted to the local contexts to take account of the sensitivities of localised issues (such as potential conflict or tensions) while being sufficiently standardised to allow for coverage of all major human rights issues and comparison of findings.

The field researches used a set of assessment questionnaires to structure their meetings and guide their conversations (rather than as checklists). The questionnaires are based on DIHR's Human Rights Compliance Assessment Tool (HRCA), ⁶⁸¹ a tool to enable companies to identify and assess human rights compliance in their operations (a more generalised copy of the interview questionnaires will be on the MCRB website). ⁶⁸²

The questionnaires covered four overarching stakeholder groups and interviews were held one-to-one, in small groups and through focus group discussions:

- Managers of ICT companies and sub-contractors
- Workers of ICT companies and sub-contractor
- Communities
- Other external stakeholders (local or national authorities, NGOs, international organisations, journalists, political parties, schools and monasteries)

Open questions were used as much as possible, in order to allow respondents to answer using their own thoughts and words, and raise the issues they considered as important. All interviews were documented with written notes and in most cased voice recorded with permission of the interviewees. Most interviews were conducted in Burmese, while local intermediaries translated in meetings with local community representatives where regional languages were used. The issues in Table 45 below were covered in the field research questionnaires.

Table 45: Topics Covered in SWIA Questionnaires

Communities who are potentially affected by ICT operations, covering ICT issue areas including: ICT uses, livelihood, consultation, land use, environment, labour, migration, children, gender, security, indigenous peoples/ ethnic peoples.

Managers of ICT companies and their contractors and suppliers, covering issues such as: customer/user privacy and security (including lawful interception and surveillance), freedom of expression (including censorship and hate speech), working conditions, and community impacts (including land use).

⁶⁸¹ DIHR, "Human Rights Compliance Assessment" (accessed 15 July 2014).

⁶⁸² http://www.myanmar-responsiblebusiness.org/



Employees and workers of ICT companies and suppliers' employees, which covers issues related to working conditions and health and safety of workers.

External stakeholders with questions related to the impacts of ICT operations for local or national authorities, NGOs, international organisations, journalists, political parties, schools and monasteries.

ICT Field Visit Locations

The SWIA field research was carried out in the following locations:

Figure 6: ICT SWIA Field Research Locations

1st round of field visits: Nov-Dec 2014

Mandalay Region:

- A. Pyin Oo Lwin
- B. Mandalay
- Sagaing Region:
- C. Sagaing

2nd round of field visits: Dec-Jan 2015

Yangon Region:

D. Yangon

3rd round of field visits: Jan 2015

Shan State:

- E. Taunggyi
- F. Nyaungshwe
- G. Shwe Nyaung
- H. Hopong

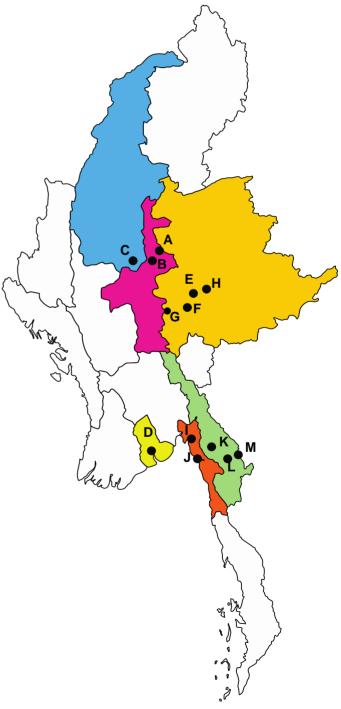
4th round of field visits: Feb 2015

Mon State:

- I. Thaton
- J. Mawlamyine

Kayin State:

- K. Hpa-An
- L. Kawkareik
- M. Myawaddy



Overview of Stakeholders Consulted



Researchers often began visits to different towns by speaking with the local township or village authorities. This helped provide an initial understanding of some of the main issues affecting or concerning the community as a whole. Researchers then conducted individual interviews and focus group discussions to discuss in more detail but without the authorities present in order to gain insights from other perspectives. The interviews generally covered the issues in the questionnaires.

Table 46 below presents a breakdown of the discussions with 181 individuals from different stakeholder groups – 143 within individual interviews and 38 attending focus group discussions. Numerous individual meetings were held in Yangon with ICT company representatives (both Myanmar and international) to present SWIA project plans and discuss their operations, policies, due diligence processes and grievance systems. Additional meetings were also held in Naypyitaw and Yangon with Government Ministers and officials.

In addition, meetings were held with various ICT industry associations, donor organisation representatives, civil society groups and governments outside of Myanmar to explain the SWIA methodology and provide the opportunity to give input on the research.

Table 46: ICT SWIA Stakeholder Interviews Conducted

	enolder Interviews Conducted
Type of Stakeholder and Numbers of Male //Female Interviewees	Field Assessment Locations
Armed Groups	Thaton, Mawlamyine, Hpa-An, Myawaddy
2 Individual interviews	Mawlamyine (1 FGD: 1 ethnic armed group)
1 Focus group discussion	Myawaddy (1 Individual: 1 ethnic armed group)
(FGD)	Hpa-An (1 Individual: 1 ethnic armed group)
6 Male	
Business	Pyin Oo Lwin, Sagaing and Mandalay
42 Individual interviews	Pyin Oo Lwin (8 Individual: 1 computer training centre, 2 fiber
2 Focus group	company, 1 Internet service provider, 2 phone shops, 1 tower
discussions (FGD)	company, 1 tower sub-contractor)
	Mandalay (8 Individual: 1 phone shop, 3 tower Companies, 1
49 Male	tower sub-contractor, 1 fiber company, 1 ICT park developer, 1
4 Female	software developer)
	1 FGD (1 tower company & top-up card printing factory).
	Yangon (11 Individual: 1 advisory firm, 2 tower companies, 3 tower sub-contractors, 1 cybersecurity company, 1 data services, 1 enterprise software developer, 1 hardware and infrastructure, 1 startup company)
	Taunggyi, Nyaung Shwe, Shwe Nyaung and Hopong Taunggyi (2 Individual: 1 local business, 1 tower sub- contractor)
	Nyaung Shwe (3 Individual: 1 Internet shop, 1 local business,
	1 software developer)
	Thaton, Mawlamyine, Hpa-An, Kawkareik, Myawaddy
	Thaton (2 Individual: 1 security service provider, 1
	That is the second of the provider, i



	telecommunications operator sub-contractor)
	Mawlamyine (1 Individual : tower sub- contractor)
	Hpa-An (3 Individual: 2 tower sub-contractors, 1 local
	business)
	Myawaddy (4 Individual: 1 bank, 1 network company, 1
-	phone shop, 1 tower sub-contractor / 1 FGD: 1 fiber company)
Community	Pyin Oo Lwin, Sagaing and Mandalay
	Pyin Oo Lwin (2 Individuals: 1 land owner, 1 religious leader)
38 Individual interviews	Sagaing (1 Individual: Land owner)
8 Focus group	Mandalay (7 Individuals: 3 land owners, 3 neighbours of land
discussions (FGD)	owners hosting ICT towers, 1 school assistant)
48 Male	<u>Yangon</u>
26 Female	(4 Individuals: 1 land owner, 1 religious leader, 2 neighbour)
	Taunggyi, Nyaung Shwe, Shwe Nyaung and Hopong
	Taunggyi (7 Individuals: 2 land owners, 2 villagers, 1 village
	elder, 1 village leader, 1 IT Developer / 5 FGDs: 1 male
	student FGD, 1 female student FGD, 2 male villager FGD, 1
	female villager FGD)
	Hopong (1 Individual: 1 Villager)
	Thaton, Mawlamyine, Hpa-An, Myawaddy
	Thaton (4 Individual: 1 land owner, 3 neighbours / 1 FGD: 1
	neighbour of land owner hosting an ICT tower)
	Mawlamyine (3 Individual: 1 land owner, 1 neighbour, 1
	Muslim community member)
	Hpa-An (7 Individual: 2 religious leaders, 2 village
	administrator, 3 villagers)
	Myawaddy (2 Individual: 2 villagers / 2 FGD: 1 village leader,
	1 migrant worker)
CBO/NGO/UN	Pyin Oo Lwin, Sagaing and Mandalay
	Mandalay (5 FGD: 4 rights-based focused, 1 IT focused)
23 Individual interviews	<u>Yangon</u>
7 Focus group	6 Individual (2 IT focused, 1 gender, 1 development, 1 rights
discussions (FGD)	based, 1 incubator hub)
52 Male	Taunggyi, Nyaung Shwe, Shwe Nyaung and Hopong
21 Female	Taunggyi (6 Individual: 2 CBO, 3 LNGO, 1 LNGO)
	Nyaung Shwe (1 Individual: 1 LNGO)
	Thatan Mandanada Has An M
	Thaton, Mawlamyine, Hpa-An, Myawaddy
	Thaton (1 FGD: 1 FGD with community based organisations
	(CBO) and local NGO (LNGO) working on health care)
	Mawlamyine (1 Individual: 1 LNGO)
	Hpa-An (5 Individual: 2 LNGO, 2 international NGO (INGO), 1
	UN / 1 FGD: 1 CBO)
	Myawaddy (4 Individual: 1 CBO, 2 NGO, 1 UN)
Government	Pyin Oo Lwin, Sagaing and Mandalay
17 Individual interviews	Pyin Oo Lwin (3 Individual)
1 Focus group discussion	Mandalay (3 Individual/ 1 FGD)
(FGD)	

00.14	Yangon (1 Individual)
20 Male	Taurani Nuarra Chura Chura Nuarra and Hanana
5 Female	Taunggyi, Nyaung Shwe, Shwe Nyaung and Hopong
	Taunggyi (3 Individual)
	Nyaung Shwe (1 Individual)
	Thaton, Mawlamyine, Hpa-An, Myawaddy
	Thaton (1 individual)
	Mawlamyine (2 individual)
	Hpa-An (2 individual)
	Myawaddy (1 individual)
Media	Pyin Oo Lwin, Sagaing and Mandalay
7 Individual interviews	Mandalay (1 FGD)
1 Focus group discussion	<u>Yangon</u>
(FGD)	(7 individual)
40.84	
12 Male Political Party	Toursayi Nyoung Chua Chua Nyoung and Llanang
5 Individual interviews	Taunggyi, Nyaung Shwe, Shwe Nyaung and Hopong Taunggyi (3 FGD)
3 Focus group	Taunggyi (3 FGD)
discussions	Thaton, Mawlamyine, Hpa-An, Myawaddy
uioudoiono	Hpa-An (1 individual)
14 Male	The fin (time trade)
5 Female	Yangon
	(4 individual)
University	Pyin Oo Lwin, Sagaing and Mandalay
5 Individual interviews	Pyin Oo Lwin (1 Individual: 1 professor)
6 Focus group	<u>Yangon</u>
discussions (FGD)	(2 Individual: 1 rector, 1 PhD Candidate / 4 FGD: 2 male
00.14	student, 1 female student, 1 professor)
20 Male	Taunggyi, Nyaung Shwe, Shwe Nyaung and Hopong
24 Female	Taunggyi (2 Individual: 1 rector, 1 military professor / 2 FGD:
Worker	1 student, 1 professor) Pyin Oo Lwin, Sagaing and Mandalay
4 Individual interviews	Pyin Oo Lwin, Sagaring and Mandalay Pyin Oo Lwin (2 Individual: 1 tower company sub-contractor,
9 Focus group	1 fiber company / 3 FGD: 1 tower company, 1 tower company
discussions (FGD)	sub-contractor, 1 fiber company)
	Mandalay (2 FGD: 1 male, 1 female)
44 Male	Yangon
20 Female	(2 FGD: 1 male worker, 1 female worker)
	Taunggyi, Nyaung Shwe, Shwe Nyaung and Hopong
	Taunggyi (1 Individual: Head of workers/ 1 FGD: 1 fiber
	company)
	Thaton, Mawlamyine, Hpa-An, Myawaddy
	Myawaddy (1 Individual: 1 spouse of lead worker / 1 FGD: 1
	spouse of worker)





The ICT SWIA Field Research Team

One of the objectives of the SWIA programme is to build the capacity of Myanmar researchers to understand human rights issues and their connection to business and to begin to develop researchers in Myanmar with this skill set. The intention was to equip the researchers to participate in assessing and contributing to consultations on issues of responsible business following their work with MCRB.

The ICT SWIA team consisted of a Myanmar SWIA manager (responsible for several current and future SWIA processes in Myanmar), an ICT Research Leader and two field researchers. The Research Leader was an ICT sector expert and the field researchers had a background in conducting qualitative and quantitative social science research. All field staff received thorough training before visiting the field. The training was carried out by local and international experts, covering basic human rights and business training, an introduction to the practice of social impact assessment, sessions on human rights impacts of the ICT sector, sessions on how to conduct focus group discussions, ethical standards for conducting field research, labour unions, foreign direct investment, and an introduction to the various SWIA questionnaires and desk research.

Following the first round of field visits, IHRB and DIHR experts debriefed the team in Yangon to reflect on the team's findings and fine-tune the research approach and the subsequent data compilation process. Following the final field visits, all the researchers' written interview notes were translated from Burmese to English. IHRB then synthesised the data to compile the field research findings for the report and held several discussions with the SWIA Manager and Research Leader to ensure the findings were accurately reported and root causes analysed.

