

# **SUDAN** Implications of financial blockages in Sudan

The 2023 conflict in Sudan has led to the damage and destruction of the banking infrastructure in Khartoum, the epicentre of fighting and where banking operators are mainly based. This has significantly affected cash access across the country, even in areas that currently do not have active conflict. Both the Sudanese Armed Forces (SAF) and Rapid Support Forces (RSF) have particularly targeted banks across the country to curtail cash access by either party. Although the online apps of major banking services, such as Bankak (the Bank of Khartoum or BoK app), resumed working in May, the provision of services remains limited and intermittent because of a lack of capacity and resources, as well as disruptions in electricity and network connections (AllAfrica 10/05/2023). Online apps, such as Cashi, KhartouMap, and Nidaa, which allow for the person-to-person (P2P) transfer of money outside the Central Bank of Sudan (CBOS) ecosystem, are also providing cash transfer services to a limited extent (Rest of World 15/06/2023). Banks have also limited operation hours to control crowding and manage their limited capacity, affecting people's access to cash in a time of uncertainty. Many of the people who fled the conflict in Khartoum left with only the cash they had on hand. Combined with a shortage of supplies and inflation because of conflict-induced disruptions, the lack of cash has affected people's access to food and other basic services to varying degrees across the country, particularly in conflict zones such as Khartoum.

#### About this report

Aim: the report aims to provide an overview of the key challenges affecting cash liquidity in Sudan, as well as the impact the lack of cash has had on affected people and humanitarian operations.

**Methodology:** the report is based on secondary data review, non-public sources, and key informant interviews with stakeholders at the national and regional levels.

Limitations: there are significant information gaps on the pre-crisis and crisis situations across different states in Sudan. As Sudan has a centralised system of operating, many of the headquarters and servers are based in Khartoum and are significantly affected by the conflict. Insecurity and network disruptions are also preventing information collection, leading to a lack of information on the impact of cash liquidity disruptions on people in Khartoum.

# **INFORMATION GAPS**

- There have been reports of parties to the conflict confiscating money from people at checkpoints, but there is a lack of public information on the situation.
- The lack of cash is driving humanitarian needs in urban areas for people who rely on wage labour and petty trade for income and are likely to have little to no savings (KII 24/07/2023; FEWS NET 24/05/2023). The prevalence is high in urban areas, although there is a lack of pre-crisis and crisis information on the people who engage in daily wage labour and petty trade as their main source of income.
- Before the crisis, Blue Nile Mashreq Bank allowed refugee and asylum seekers to open accounts using refugee ID cards and a referral letter from UNHCR. As a result of this requirement, refugees and asylum seekers faced limited practical choices for receiving and safeguarding their money. The lack of clear regulations concerning refugee ownership of mobile SIM cards also posed an additional obstacle to accessing financial solutions, including mobile banking apps (UNHCR 21/06/2022). There are significant information gaps regarding the current situation of refugees and asylum seekers remaining in Sudan in terms of access to cash and other services.
- Significant information gaps remain on the coping mechanisms that people use to address the lack of cash. Affected people are widely reported to rely on the support of their families and communities, including religious institutions, to meet their basic needs, and this system of support may become strained as humanitarian needs continue to increase.
- Insecurity and other impediments constrain information collection from Khartoum. There is a lack of comprehensive understanding of the people remaining in the city and the humanitarian impact of the conflict on them.

# FACTORS DISRUPTING CASH LIQUIDITY IN SUDAN

#### **Closure of the Central Bank of Sudan and banks in conflict-affected areas**

Accessing cash has been difficult for the affected population since the conflict erupted, particularly in Khartoum, as the majority of banks remain closed (OPB 10/05/2023; NRC 15/05/2023; Africanews 28/05/2023; KII 25/07/2023). CBOS regulates the financial and banking sector, the Khartoum stock exchange, and the Insurance Supervisory Authority, all of which are based in Khartoum and have been affected by the conflict. In May, the SAF army chief dismissed the CBOS governor, disrupting their operations and hindering CBOS' ability to circulate cash (Channels 19/05/2023). As a result, available cash reserves are being depleted (NRC 24/07/2023; REACH 07/08/2023). People that have been able to withdraw money from banks are currently storing it in their houses, further affecting the overall circulation of cash (KII 25/07/2023).

According to a market assessment across Khartoum, around 55% of the cash used in markets in Khartoum since the onset of the conflict is either sourced from personally stored liquidity or borrowed, while 20% comes from informal cash transfer agents. 25% of vendors have also cashed out mobile money into cash or Zain phone credit to a limited extent (ADRA 26/07/2023). In eastern Sudan, especially in Port Sudan, banks and other financial firms have resumed operations (KII 27/07/2023 b). Although some banks have reopened since the conflict started, insecurity on roads and disruptions to people's mobility and access to markets and services have reduced cash liquidity (OPB 10/05/2023).

Even before the conflict, Sudan's banking sector already lacked capacity and resources to meet the needs of the whole country. Only 15.3% of the population had access to bank accounts pre-crisis, as people lacked confidence in the banking sector and preferred to use informal or alternative methods of money saving and transfers. The low literacy levels in Sudan and ease of accessing hawalas (an informal channel outside traditional banking systems for transferring funds without the movement of money from one location to another) in the country, even in rural areas, have also resulted in the low uptake of banking services by Sudan's population (TheGlobalEconomy.com accessed 02/08/2023; KII 24/07/2023; KII 25/07/2023). That said, pre-crisis, Khartoum had less infrastructure for informal money transactions than the rest of the country.

Most financial institutions, including banks, are concentrated in Khartoum (US ITA accessed 14/07/2023). CBOS' official data presented in 2018 provides the most recent statistics available. The banking sector involves a total of 37 banks, including six specialised banks and 32 commercial banks, with five foreign (mostly based in the Gulf states) and four state-owned. Among the foreign banks, Blue Nile Mashreq Bank and BoK are the most notable for offering

retail digital financial services, such as bank-to-bank money transfers, at a large scale. Humanitarian organisations frequently use these two banks for cash transfers, especially for cash assistance programmes. MasterCard and Visa, while available, are relatively new and not commonly used for local transactions in Sudan because of the financial sanctions imposed on the country (3US ITA accessed 09/08/2023; FSD 27/10/2022; KII 25/07/2023).

## Figure 1. Official figures on the banking sector, 2018



Source: ACAPS using data from FSD (27/10/2022)

## Destruction and looting of banking infrastructure

Before the crisis, most banks in Sudan had their systems hosted in their headquarters in Khartoum. The conflict has resulted in the damage and destruction of the banking system infrastructure, including servers, rendering the majority of banks non-functional and disrupting contact and operations between headquarters and branches. As at 20 May, bank-to-bank payments had been largely cut off, preventing the transfer of money between accounts (Channels 19/05/2023; NRC 24/07/2023). Even in states unaffected by violence, the connection between bank branches and headquarters in Khartoum had been disrupted, limiting operations nationwide (Channels 19/05/2023). Since July, although some foreign-owned banks have been able to restore their systems by relocating them out of Khartoum through their foreign ties, cash access remains a challenge across Sudan, as physical cash to some extent remains largely in Khartoum (KII 24/07/2023; Channels 19/05/2023; KII 27/07/2023 b).

Amid the violence and insecurity, parties to the conflict have targeted and looted several bank headquarters and branches in Khartoum, including CBOS (NRC 24/07/2023; AllAfrica 10/05/2023; Reuters 04/05/2023). During the first weeks of the conflict, the Khartoum branch of CBOS was burnt. On 31 May, the SAF bombed the country's only currency printing press in Khartoum to prevent the RSF from taking over CBOS facility to print money to fund their operations. There were also reports of money printing plates and money in CBOS being stolen (KII 25/07/2023; Bloomberg 31/05/2023). Before the conflict, Sudan had been printing money to mitigate the impact of not having enough revenue because of the subsidies introduced by the Government to help people access services, such as fuel (ICG 22/06/2020). This had driven inflation, as there was more money in circulation while the supply of goods had not increased, raising the cost of basic items. Without the facility to print money, combined with the lack of cash circulation and rising prices as a result of the conflict leading to an increased demand for goods, Sudan is likely to experience significant macroeconomic consequences.

#### **Reduced operations in functional banks**

Banks that remain operational, such as the BoK, which is the largest bank in Sudan with 194 branches countrywide, have limited their operation hours and the number of people allowed to access their services every day to manage the limited cash available (Channels 19/05/2023; NRC 24/07/2023; Reuters 04/05/2023; FSD 27/10/2022). People have had to queue for days before being able to enter functional banks to withdraw their money (Africanews 28/05/2023 and 30/05/2023). Vendors and available services primarily rely on Bankak, the BoK mobile app, for domestic money transfers (ADRA 26/07/2023; KII 24/07/2023; KII 25/07/2023). This online banking app serves as a platform for utility bill payments, P2P transfers, business-to-person transfers, Western Union remittances, foreign exchange, and point-of-sale transactions. Informal money transfers through mobile network operators that were commonly used

pre-crisis also remain widely used. The drawback is that these informal methods come with substantial withdrawal fees ranging from 10-50% of the transfer value, depending on the transfer location and availability of cash (CGAP 22/05/2023). The heavy dependence on Bankak and informal credit transfers, such as airtime transfers (where people use airtime as a form of money transfer and exchange it for cash at informal agents), indicates limited options for the population to transfer money within the country. At the same time, high withdrawal fees through informal platforms can be a significant burden for individuals who need to access their money promptly or frequently. Although these challenges create barriers for people who do not have access to formal banking services or digital payment solutions, there are informal Bankak agents who support money transfers to individuals without a BoK account (KII 24/07/2023; FSD 27/10/2022).

# Disruptions to network connectivity limiting access to online and mobile banking

Although people's dependence on mobile money transfer services has increased since the conflict, network connectivity disruptions because of infrastructure damage have further hindered their ability to use the already limited online and mobile banking services, particularly in Khartoum (KII 25/07/2023). Despite its popularity, the Bankak app faces challenges of slow and disrupted internet connectivity, frequent system disruptions, and limited power to charge mobile phones (ADRA 26/07/2023). There were some improvements with mobile networks in July, allowing for the better use of banking apps for cashless payment and money transfers, but the issue remained around accessing physical cash (NRC 24/07/2023).

# **Disruptions to systems of sending remittances**

The conflict has led to the damage and destruction of buildings and displacement of people, especially in Khartoum, closing the majority of foreign exchange firms in the state. Some services, such as Western Union and transfer services offered by private entities stationed out of Sudan, are still operational outside Khartoum and other conflict-affected areas but limited by exchange rate fluctuations (KII 24/07/2023; Al-Monitor 25/04/2023). Since the start of the conflict, Western Union foreign exchange firms have only been operating in safe zones or cities with no active conflict (Africanews 28/05/2023).

Before the conflict, Sudan faced years of banking sanctions. The country was subject to financial sanctions by the US between 1997–2020 and currently remains subject to UK sanctions (The Africa Report 15/12/2020). Although some of these sanctions had been lifted, the process of delisting banks is lengthy, meaning challenges in transferring money to Sudanese bank accounts from foreign bank accounts remained even pre-crisis (KII 27/07/2023 b).

People with the resources who have been able to flee Sudan continue to use informal channels to send remittances to people still stuck in Khartoum. Although actual numbers are not available, it is estimated that remittances have risen with the increase in the number of Sudanese residing outside Sudan since the conflict. People with BoK accounts in diaspora are also using the Bankak app to transfer remittances (KII 24/07/2023). Although people are transferring money at scale from abroad to the few banks remaining operational in Sudan, challenges remain in accessing this cash, as automatic teller machines have been destroyed and looted. There is also a lack of physical money within the country, affecting the circulation of cash (OPB 10/05/2023; Monitor 28/04/2023; KII 25/07/2023; KII 27/07/2023 b).

Before the conflict, diaspora remittances were a key source of capital flow in the country (amounting to 2.9% of the 2022 GDP), playing a critical role in the economy (WB accessed 07/08/2023). According to a 2020 UNDP research, 98% of Sudan's diaspora remitted money to the country, with only 12% using formal channels. Similarly, almost 90% of households received remittances through unofficial channels, such as P2P platforms or in kind. Of the 98% that sent money, 10% sent money for investment purposes, 40% for social obligations, and 48% for both. The displacement of people as a result of the conflict has severely disrupted the systems that support P2P money transfer channels across Sudan (UNDP 10/09/2020; NRC 13/06/2022).

# FIGURE 2. KEY IMPLICATIONS OF THE LACK OF ACCESS TO CASH

Limited access to cash: key implications				
Food and other essentials	Transport	Education	Agriculture	Healthcare and medicine
<ul> <li>Price hikes - up by 135%</li> <li>Unpaid salaries</li> <li>Limited stock (no cash to restock)</li> <li>Insecurity in and looting at markets</li> <li>Limited bussiness hours</li> <li>Food needs remain unmet</li> </ul>	<ul> <li>Fuel shortages</li> <li>High cost of travel</li> <li>Inability of people to leave conflict-affected areas</li> <li>Poorest are most affected.</li> </ul>	<ul> <li>Teachers not paid since 15 April 2023</li> <li>Teachers were already extremely poorly paid.</li> <li>Inability of families to cover education costs</li> <li>Impact on education</li> </ul>	<ul> <li>Reduced 2023 production because of:</li> <li>reduced opportunity to sell last years harvest</li> <li>inability to purchase agricultural inputs</li> <li>65% of the population relies on agricultural livelihoods</li> </ul>	<ul> <li>People with chronic illnesses are unable to access medication because of:</li> <li>their inability to pay for it</li> <li>limited supplies</li> </ul> <b>Pharmacy Pharmacy Pharmacy Families are unable to afford healthcare.</b>

Source: ACAPS

# **IMPACT OF THE LIMITED CASH FLOW IN SUDAN**

People are rationing their cash and food supplies to make ends meet, but both are being exhausted quickly (Monitor 28/04/2023). In Khartoum, although many people were able to flee the conflict during its first few weeks, many are still stuck in the city as a result of high transportation costs brought about by the inaccessibility of cash, high fuel prices, and safety and security issues (KII 24/07/2023; La Prensa Latina 06/05/2023; Monitor 28/04/2023).

Before the conflict, prolonged violence had already limited cash flow in Darfur region, especially in West Darfur. The current conflict, which has resulted in displacements and increased violence in West Darfur, is worsening the already fragile financial structures that largely depended on informal lenders for cash transfers. Money transfer agents and hawala lenders, whom the majority of the population depended on before the conflict, are no longer operational in West Darfur, with continued violence and mass displacements across the state resulting in safety and security issues (KII 27/07/2023 a; HRW 04/08/2023; ACAPS 18/07/2023; IMF 12/2002).

#### **Exchange rate fluctuations**

Before the conflict, CBOS provided banks with daily exchange rates. This was halted as the conflict disrupted CBOS' operations. Since May, the foreign exchange rate has been unstable, with a slight decline observed in May–June compared to March–April. That said, even with the conflict intensifying in May, the Sudanese pound has not suffered a significant drop and has remained close to pre-conflict exchange rates (Table 1). The slight decline in the exchange rate can be attributed to a reduced demand for foreign currency to import goods and inputs from abroad (WFP 30/06/2023 and 14/03/2023; KII 27/07/2023 b).

#### Table 1. Exchange rate fluctuations in Sudan between February–June 2023

PERIOD	AVERAGE PARALLEL EXCHANGE RATE Per USD 1	COMMERCIAL BANKS' AVERAGE RATE Per USD 1		
February 2023	SDG 600	SDG 590		
June 2023	SDG 560	SDG 560		
Source: WFP (30/06/2023)				

Although the official exchange rate has not fluctuated by a lot, without CBOS, exchange rates in Sudan have been unregulated and unstable because private entities assisting in transfer assistance services as well as markets and other service providers currently determine exchange rates, leaving room for exploitation (KII 25/07/2023). With the rising demand for local currency to access services and basic goods, whoever can exchange US dollars determines its value (Monitor 28/04/2023). Just before the crisis, the Ministry of Finance had instructed the Labour Office to charge fees in US dollars instead of Sudanese pounds because of a lack of hard currency in the country (KII 27/07/2023 b). It should be noted that people are not allowed to deposit US dollars into bank accounts in Sudan. This could be why people have more USD in cash to use instead of SDG.

#### Inflation

Inflation rates have not been officially released since March 2023, but there are serious concerns about the significant surge in the prices of goods and services. Supply shortages resulting from a combination of factors, such as transportation disruptions and a lack of cash to restock, had skyrocketed food and NFI prices by up to 135% as at 24 May (FEWS NET 24/05/2023). In June 2023, the cost of a local food basket (LFB) used by WFP rose by 11.5% compared to May 2023 and by 27.9% compared to June 2022. Between May and June 2023, the average daily wage rate for casual labourers also rose by 36%, from SDG 4,000 (USD 7.10) to SDG 5,439 (USD 9.70), and even more substantially by 83% compared to June 2022 (WFP 30/06/2023).

If these conditions continue, experts anticipate a severe shortage in food and other essential commodities. This will worsen the situation and lead to further price hikes, ultimately resulting in a rapid deterioration of food security for millions of people in Sudan (WFP 30/06/2023; FEWS NET 24/05/2023).

#### **Unpaid salaries**

Many employers have not been able to pay staff salaries consistently, including for humanitarian staff, with affected people reporting that they already have, or soon will, exhaust their available financial resources to access food and other basic items (OPB 10/05/2023). According to the Ministry of Finance, the country has lost almost 90% of its projected earnings since the conflict began, hindering salary payments for civil servants (AI Taghyeer 18/07/2023). Since the conflict began, Sudan's High Emergency Committee, currently run by the SAF, has decided to only pay security forces, as the country did not have access to sufficient liquidity to pay full salaries to other civil servants. On 18 July, the High Emergency Committee instructed state corporations to pay only 60% of salaries. In response, the

Sudanese Trade Union Front has held periodical protests in Khartoum (Al Taghyeer 18/07/2023; Dabanga 19/07/2023). The unemployment rate, especially in Khartoum, will likely rise as the conflict affects many people's livelihoods. Businesses have closed, and markets only operate for a few hours because of insecurity and violence (KII 24/07/2023; Dabanga 02/06/2022; Mercy Corps 08/05/2023; NRC 24/07/2023).

#### Impact on education

Because of the crisis, the Government has not paid teachers in the public education system since the start of the conflict. The lack of salaries will likely affect the commencement of the new school year in September (KII 25/07/2023). Even before the conflict, parents in many government schools in urban and rural areas had contributed to school upkeep and instructional materials for teachers, including through the provision of food, because funding for government teacher salaries was low (KII 24/07/2023). The usual academic year in Sudan is from August–May, and most schools and educational institutions in Khartoum have been closed since the start of the conflict on 15 April (UNICEF 25/04/2023; OCHA accessed 01/08/2023). As at 9 August, the education ministry had not provided any directive on school resumption for the upcoming academic year.

#### Limited access to markets

The decrease in market access can be majorly attributed to safety and security issues leading to the looting of markets on several occasions. Steep price increases, the limited availability of items, and the lack of access to cash and savings also contribute to the issue (ADRA 26/07/2023; NRC 15/05/2023). An Adventist Development and Relief Agency International assessment conducted between June–July indicates that despite a notable increase in commodity prices, most markets in Khartoum remained operational but to a limited extent. Local informal markets known as dagalo markets, notorious for the sale of stolen goods and items, also remained operational in some areas. These markets typically provide an outlet for goods looted from houses and stores, predominantly NFIs. The RSF typically runs dagalo markets to fund their activities. Despite the political connotations and illegitimate origins of their merchandise, these markets attract customers through significantly lower prices, posing a competitive challenge to official markets. Some of the market vendors interviewed in the assessment admitted to purchasing stocks from dagalo markets for reselling (ADRA 26/07/2023). §

#### Limited food access

The prices of food and other essential items have continued to increase, making them unaffordable (NRC 15/05/2023). In some areas, the prices of basic items, such as bottled water, food, and cooking fuel, have increased by 40–60% (La Prensa Latina 06/05/2023;

Reuters 04/05/2023). In Khartoum, a mainly urban area, most people depend on markets to buy food and other essential items. The lack of cash significantly affects their access to food (REACH 07/08/2023). The continued disruptions to essential trade flows and economic activity, combined with inaccessibility, are likely to expand the areas experiencing acute food insecurity and large food consumption gaps (FEWS NET 24/05/2023).

#### Inability of farmers to afford agricultural inputs

Before the current conflict, 65% of Sudan's population relied on the agricultural sector for their livelihoods. Although the majority of the fighting remains in urban areas, rural areas also anticipate a decline in the 2023 cropping season since cash shortages around the country disrupt the financing of agricultural input (FEWS NET 24/05/2023). Cash inaccessibility during the planting season, which began in May, has severely affected farmers' access to credit lines for agricultural inputs such as seeds, fertilisers, and pesticides. Market disruptions in Khartoum have also reduced farmers' access to cash for planting since the majority of them depend on the sale of previous harvests to buy agricultural inputs for the new planting season. Although the state-owned Agricultural Bank issued a directive to continue the preparation of farmlands with a promise of fertilisers, fuel, and seeds in May, farmers were yet to receive any assistance as at 17 July (Dabanga 02/06/2022; Reuters 17/07/2023; UNHCR 21/06/2022). As a result, according to El Gezira and El Managil Farmers Association, preparations for the 2023 agricultural season diminished by 3% compared to 2022 (Dabanga 02/06/2022).

#### Inability to buy medicine or access health services

The lack of cash and limited medical supplies have prevented people with chronic illnesses from accessing their medication from pharmacies. This is likely to result in an increased number of deaths as an indirect cause of the conflict, which is usually underreported or unaccounted for (KII 24/07/2023; KII 25/07/2023; Babiker et al. 04/10/2021).

The damage and destruction of healthcare facilities have severely impeded healthcare access. The lack of cash aggravates the issue, as it affects how health facilities and pharmacies purchase medical supplies and prevents people from buying medicine from available stocks. Individuals with National Health Insurance can access medicine from the available stock in pharmacies, but this access also remains limited. The most recent available data shows that in 2022, although the National Health Insurance Fund covered 81.7% of the population, the majority of Sudanese people still paid for their medicine from their own means (KII 24/07/2023; Elhadi et al. 21/04/2022).

#### Inability to afford transportation, including to flee conflict-affected areas

Transport prices have also spiked because of fuel shortages, as many gas stations have closed since the start of the conflict (La Prensa Latina 06/05/2023; Monitor 28/04/2023). Bus drivers typically want payment in Sudanese pounds from people fleeing Khartoum, as that is the currency they use to pay for gas. Many people only have US dollars with them, resulting in them having to pay more given privately determined exchange rates (see also Section 3.1) (Monitor 28/04/2023; KII 25/07/2023). As a result, the majority of those who have been able to afford transport out of Khartoum mostly come from middle-class households with savings. Those dependent on daily wage labour are likely unable to access the funds they need and have been forced to remain in conflict-affected areas (KII 25/07/2023).

# **IMPACT OF FINANCIAL BLOCKAGES ON HUMANITARIAN OPERATIONS**

Without CBOS regulations, humanitarian responders are losing almost 20% of cash assistance funds because of exchange rate fluctuations in the different financial services they use. INGOs have also been facing bureaucratic impediments, such as rent-seeking behaviour from local stakeholders, when providing cash assistance to affected communities (KII 24/07/2023).

#### Impact of financial blockages on the humanitarian response in Khartoum

The lack of cash and depletion of stocks have constrained the humanitarian response across the country (NRC 15/05/2023). Humanitarian responders are currently present in all 18 states but operate in limited conditions in the states with widespread violence. Within Khartoum and Darfur states, fighting and insecurity, along with major service disruptions, have created significant humanitarian response constraints and information gaps. Even informal money transfer systems, such as hawala, are disrupted, as insecurity prevents lenders from physically making cash drop-offs in Khartoum (KII 27/07/2023 b). Despite the liquidity crisis limiting cash-based assistance across the country, market assessments in Gadaref, Kassala, Port Sudan, and Wadi Madani reveal a wide range of available stocks and the ability to restock in a relatively short time. The assessments also confirm the capacity of already contracted financial service providers, MTN (a mobile network provider with fintech services), and Western Union to deliver on transfers. With the current active status of Red Rose, a digital platform for managing cash transfer programmes, WFP Sudan projects to restart cash assistance for roughly 32,000 Kassala recipients. The implementation of beneficiary identification management solutions will complement this gradual reinstatement of cashbased support, commencing with almost 33,000 families in Gezira (WFP 23/07/2023; ADRA 26/07/2023). Although medical organisations are active in Khartoum, direct assistance, such

as WASH and shelter activities, still faces challenges because of insecurity, inflated prices, and the lack of cash. Civil society organisations, religious organisations, and emergency rooms established to respond to specific needs are filling the gaps left by the reduced humanitarian operations in local communities. Although this has supported community needs to some extent, the current situation is still beyond the capacity of community support, especially with the conflict continuing to increase humanitarian needs (Sudan INGO Forum et al. 18/06/2023; KII 24/07/2023).

#### Alternative approaches to providing cash assistance outside Khartoum

Outside Khartoum and other conflict-affected areas, humanitarian organisations have been using microfinance institutions (MFIs) to pay for cash distributions. That said, the majority of the 44 MFIs involved in accepting deposits and offering credit services pre-crisis are based in urban locations which are currently most affected by conflict and insecurity (FSD 27/10/2022). Therefore, people previously using MFIs in these urban centres are likely unable to access their services now. Some humanitarian responders have also resorted to conducting money transfers to the bank accounts of their staff based in certain localities, who then transport the cash to affected individuals without access to a bank account (KII 24/07/2023). Humanitarian responders have also resorted to using the few private Sudanese entities outside Sudan who have the capacity to support transfer assistance programmes, such as the DAL Group (a Sudanese conglomerate with investments in industries including technology). Similarly, for remote locations without mobile network access and other similarly inaccessible banking services, humanitarian responders have been using informal systems of money transfer, such as hawala, to provide assistance to affected people. Before the conflict, hawala lenders were not an officially recognised mode of cash transfer by donors. Given the current context, some donors are considering the necessity of humanitarian responders using hawala lenders where other options are unavailable, but concerns remain around sanctions and other risks related to fraud, waste, and abuse (USAID 28/06/2023). Previously established cross-border agreements between communities are also proving integral to cash transfer assistance to the displaced communities they host (KII 24/07/2023; Mann 22/05/2015; KII 27/07/2023 b).