



THE
GOVERNANCE
GROUP

Review of the Business Integrity Country Agenda (BICA) Assessment Framework and Methodology

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I. Executive Summary

The overall purpose of this review was to evaluate the BICA methodology and conduct an initial assessment of its strength as an advocacy and reform tool. Countries that were included in this study had all completed a BICA assessment by the end of 2018: Mozambique (2016), Turkey (2017), Italy (2017), Cambodia (2017), Malaysia (2017), Brazil (2018), Kenya (2018), Mongolia (2018), Trinidad and Tobago (2018).

TI's BICA aims to initiate collective momentum to strengthen business integrity in a country. To do so, a credible foundation for action needs to be established, with a thorough assessment of the major factors impacting companies' ability to do business with integrity. It should also involve a multi-stakeholder process for discussing and driving change – the *National Advisory Group (NAG)* with members from government, civil society, and the private sector. The BICA assessment determines the status of various thematic areas broken down by various indicators and proposes recommendations for key indicators in order to improve their status, which is then captured in a BICA Assessment Report.

National chapters consider the BICA assessment framework to be fully appropriate for the task of generating an accurate baseline assessment of the state of business integrity at the national level. Overall, chapters felt that the BICA framework produced an accurate baseline assessment, though some chapters had reservations about the extent to which they were able to generate accurate data given their resource envelope. Chapters also felt that the BICA produced relevant information for a reform agenda. NAG members' opinions on the usefulness of the BICA assessment framework generally reflected the opinions of chapters, though their responses were more conservative in their estimation of whether objectives had been successfully achieved.

The multi-stakeholder approach was considered fruitful for most chapters. However, building a functional national advisory group (NAG) required enormous investments of time and energy that sapped the resources of smaller chapters. Most chapters agreed that NAG members provided a diverse array of opinions, and well-informed discussion, as well as sources of information that may not have been otherwise accessible to researchers. In fact, the most often cited strength of the NAG was its assistance in gathering relevant information and gaining access to contacts for interviews. However, NAGs were much less successful in providing constructive feedback on BICA findings and identifying strategic recommendations. One surprising finding of this review is that neither the NAGs, nor the individual NAG members, formed the foundation for Stage 2 activities. In fact, most chapters have found it difficult to decide how best to utilize the NAG once Stage 1 activities were completed.

Few chapters have officially followed through to the advocacy stage, citing lack of funding and personnel as primary reasons for this failure. Several chapters have incorporated BICA findings into their existing chapter or business integrity strategies, but some chapters are engaging in ad hoc activities that are driven by their BICA experiences and findings, but have no overall strategy guiding the advocacy process. Chapters with previously-established relationships with external stakeholders did not find that the BICA positioned them as more credible partners or increased their engagement with individual companies. But all chapters benefited from expanding networks of relationships, and those chapters who did not have strong networks found that BICA helped them considerably in establishing new connections and network possibilities. Chapters reported that external stakeholders expressed and demonstrated interest in the contents of reports, and were impressed by the rigor and specificity of findings. NAG members generally echoed the findings from chapters, though NAG members felt that advocacy-related objectives for the BICA were achieved to a larger extent across the board.

Although the BICA assessment framework has not resulted in stronger advocacy strategies for business integrity in all chapters, it has served to strengthen and build chapter relationships with the private sector, and with actors who deal with the private sector on a regular basis. Indeed, chapters were most active in this sphere of work, regardless of the existence of a strategy. NAG members felt that relationship-building objectives for the BICA were achieved to a large extent with regulatory and law enforcement bodies, and government officials.

It is much too early in this first cycle of BICA exercises to expect major impacts, and in fact, it is unlikely that there will be much clarity over the role of BICA findings in bringing about longer-term outcomes without rigorous impact evaluation. In addition, chapters are not formally tracking outcomes, which makes it difficult to understand how their activities are related to outcomes within a much wider context. Overall, chapters are optimistic about reforms that may come out of the BICA process, with a majority citing that reforms have either been recently achieved, or reforms are in the pipeline, but not yet in effect. By contrast, NAG members are more cautious about claiming reform success.

Although there is always concern with the level of impact that a new tool can produce, this review exercise has revealed that **the most important strength of the BICA assessment and methodology is its ability to establish and strengthen relationships that are the precursors to change**. Anti-corruption advocacy work functions within a complex *system* of relationships. It is characterized by connections among individuals and organizations. Relationships are continuously being established, refined, and practiced, and unregulated by any central authority. These complex systems cannot be reduced to their constituent parts, because it is *the way that actors work together* that brings about change, not simply the activities in which they engage. In the case of advocacy around corruption and governance, with a specific focus on the private sector, itself comprised of hundreds (or thousands) of actors, systems approaches based on ever-expanding relationships and spheres of work are better positioned to capture how change works.

BICA Stage 1 activities, specifically the multi-stakeholder approach and the intensive qualitative research process, have allowed chapters to expand both their knowledge base and their network of potential partners across government, civil society, and the private sector. While stage 2 activities may not have officially been launched, advocacy activities have naturally emerged as a result of the relationship-building from Stage 1, and BICA findings are supporting a variety of reforms, initiated by chapter partners, chapters themselves, and outside actors that are often requesting to work with chapters and serve as potential connections in an expanding network.

II. Introduction

Transparency International's (TI) Strategy 2020 outlines assessing and tackling corruption risks in the business sector and engaging with businesses to improve corporate practices as an integral part of their focus. TI has highlighted that their work with the private sector will focus on business leaders, regulators and consumers to ensure there is a clean business environment, identifying and promoting best practice, and strengthening corporate anti-corruption systems and prevention mechanisms, on both a country level and internationally. As part of this, in 2014 Transparency International launched the Business Integrity Country Agenda (BICA) as the first comprehensive analysis framework which specifically assesses efforts by all stakeholders to reduce corruption in and from the business sector at a country level. Using a comprehensive and unique approach which assesses both the regulatory and social environment companies operate in as well as how companies themselves contribute to doing business with integrity, BICA aims to propose a reform agenda which seeks to improve the business integrity environment in the country and ultimately reduce corruption in the country's business sector.

Based on evidence captured, BICAs aim to:

1. Help identify the major challenges of business integrity within a country and thus provide credible information for advocacy activities;
2. Engage stakeholders in a shared diagnosis of the situation; and
3. Act as a baseline against which progress can be subsequently measured.

The main beneficiaries of BICA include government, regulatory and law enforcement bodies, investors, business associations, other civil society organisations, and businesses themselves. BICA aims to benefit all through an approach to broadly frame and analyse the issues of business integrity from their country's perspective, and as a multi-stakeholder process for discussing and driving change.

TI's BICA aims to initiate collective momentum to strengthen business integrity in a country and recognises that in order to do so a credible foundation for action needs to be established, and such action needs to be based on a thorough assessment of the major factors impacting companies' ability to do business with integrity. The BICA assessment therefore determines the status of various thematic areas broken down by various indicators and proposes recommendations for key indicators in order to improve their status, which is then captured in a BICA Assessment Report.

The BICA assessment is split into two stages, Stage 1 Assessment and Stage 2 Collective Action. During Stage 1, information on major thematic areas impacting business integrity are gathered and key recommendations are made in order to maintain or improve the current situation. There are two major outputs at this stage, namely the establishment of a National Advisory Group (NAG) and the launch of a BICA Assessment Report (the reform agenda). The NAG comprises various stakeholders from the public sector, business sector, and civil society who provide input to the BICA assessment and can be partners for implementing/advocating the implementation of recommendations made. Their role is to provide sources of information and views that may otherwise not be used or known, advise on research for the selection or addition of thematic areas and on outreach, offer feedback on BICA findings and identify strategic recommendations. In addition, the NAG should also discuss ways to transform the strategic recommendations into an operational agenda, help to strengthen the legitimacy and buy-in of key stakeholders into the BICA process and the final report, and promote the BICA findings and recommendations afterwards.

During Stage 2, the key recommendations on the Assessment Report are operationalised into concrete reform steps to be implemented by relevant stakeholders in the medium to long term.

Overall, BICA assesses:

1. Efforts by the public sector i.e. regulatory environment companies operate in.
2. Efforts by the business sector i.e. how companies themselves contribute to doing business with integrity including adherence to voluntary codes of conduct, disclosure of relevant information, partnerships with relevant stakeholders etc.
3. Efforts by civil society i.e. requirements by independent watchdogs.

The overarching objective of a BICA is to trigger real change and improvements in the country, and monitoring and evaluation of the progress made over time from the BICA recommendations are a key aspect of the agenda.

III. Purpose of BICA review and methodology

The overall purpose of this review was to evaluate the BICA methodology and conduct an initial assessment of its strength as an advocacy and reform tool. The following countries were included in the sample (publication date of Stage 1 reports included):

- | | |
|-------------------------------------|---------------|
| 1. Mozambique | February 2016 |
| 2. Turkey | February 2017 |
| 3. Italy | October 2017 |
| 4. Cambodia | November 2017 |
| 5. Malaysia | December 2017 |
| 6. Brazil | March 2018 |
| 7. Kenya | May 2018 |
| 8. Mongolia | May 2018 |
| 9. Trinidad and Tobago ¹ | December 2018 |

A review of literature and documentation relevant to the review (BICA country reports, BICA conceptual documents, and TI Monitoring Guide) was conducted, and the following data collection tools were employed (in consultation with the TI contact point and reference group):

1. An online survey of BICA stakeholders, e.g., TI National Chapters, members of the NAGs, and internal and external stakeholders from each country. See annex B for contents of survey.
2. A focus group with TI staff on the methodological strengths and weaknesses of BICA, as well as an interview with [REDACTED], who contributed to the development of BICA. The focus group consisted of the following TI staff: [REDACTED] (Head of Business Integrity), [REDACTED] (Business Integrity programme coordinator), [REDACTED] (Regional Coordinator for Asia-Pacific countries) and [REDACTED] (Research advisor on business integrity)

¹ Trinidad and Tobago was added after the review exercise was launched.

3. Semi-structured interviews with TI chapters in each country using online platforms such as Skype. See annex A for list of interviews.

Interviews from each country attempted to encompass at least the following individuals:

1. TI chapters (including country researcher if available)
2. Member of the National Advisory Group: private sector
3. Member of the National Advisory Group: civil society
4. Member of the National Advisory Group: government (if available)

All TI chapters were interviewed. Ultimately, only two NAG members agreed to be interviewed within the time frame of the study, one from the private sector and one from civil society. Eight NAG members completed the survey, from a total of four countries.²

Table 1: Survey participation of NAG Members

Chapter	Number of NAG members responding to the survey
Mozambique	None
Turkey	None
Italy	2
Cambodia	None
Malaysia	2
Brazil	None
Kenya	3
Mongolia	1
Trinidad and Tobago	None

IV. Proposed Theory of Change

Large-scale social problems such as democracy-strengthening and governance, (or chronic poverty, cycles of violence, racial and ethnic mistrust, global trafficking, tensions over migration, environmental damage, etc.) are difficult to address with one-dimensional interventionist approaches. Anti-corruption and transparency, in particular, are part of complex systems that are dynamic, unpredictable and non-linear, and are constituted by relationships and interconnected parts. They respond best to approaches that recognize the nature of change (abrupt or incremental), where social problems may be nested within several, overlapping contexts, e.g, corruption is both an institutional and a behavioral issue, among others.

Systems approaches are characterized by the emphasis on connections among individuals and organizations. Relations among agents are continuously being established, refined, and practiced, and

² Four additional survey responses were started, but not completed. No responses were recorded except country and sector.

unregulated by any central authority. These complex systems cannot be reduced to their constituent parts, because it is *the way that agents work together* that brings about change, not simply the activities in which they engage. In the case of advocacy around corruption and governance, with a specific focus on the private sector, itself comprised of hundreds (or thousands) of actors, systems approaches based on ever-expanding relationships and spheres of work are better positioned to capture how change works.

The BICA outcomes framework can thus be visualized as spheres of work that lead to different kinds of outcomes depending on the expanding group of actors involved. The smallest and most contained sphere consists of research based on the BICA framework and methodology. Primary outcomes include an improved understanding of business integrity in the country, as well as potential for increased cross-sector collaboration within chapters based on BICA findings. The next larger sphere of work consists of advocacy, and related outcomes include improved strategies (and planning, particularly with other actors), increased public awareness of issues surrounding private sector corruption, and improved relationships with actors working on similar issues. The largest sphere of work consists of impact, which is a longer-term outcome consisting of changes in both government and private sector practices, as well as the laws and policies governing their activities.

Figure 1: Proposed theory of change for BICA framework and methodology



The sections that follow are organized based on this theory of change proposed for the BICA framework and methodology.

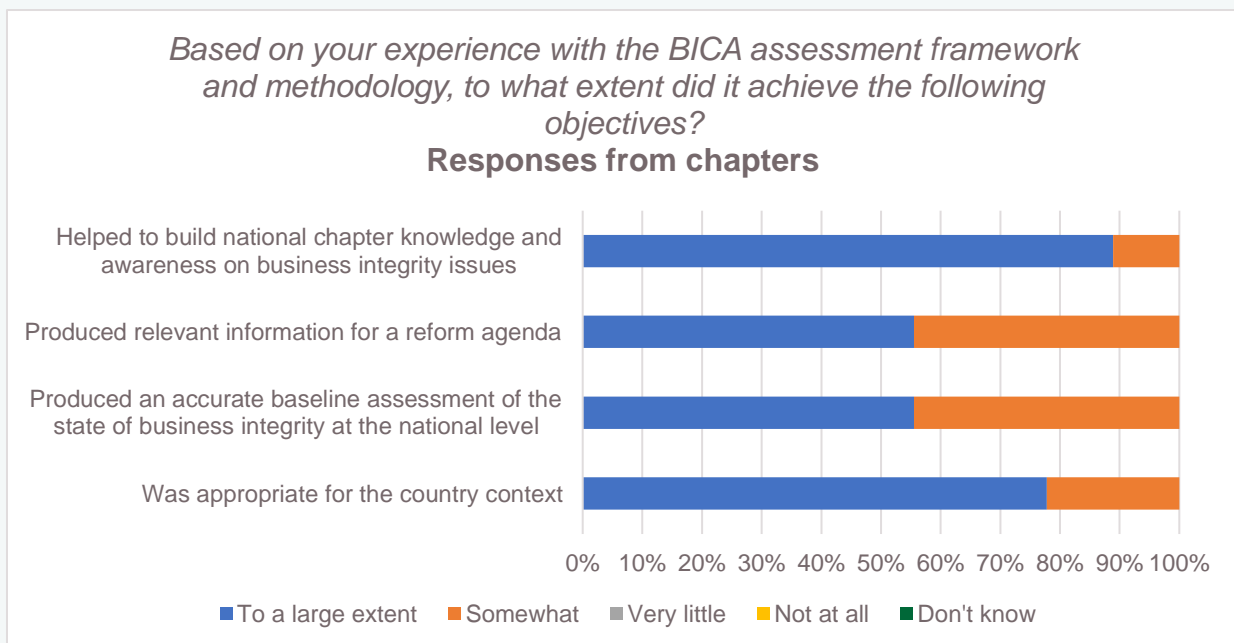
V. Findings: BICA Methodology and resources

National chapters consider the BICA assessment framework to be fully appropriate for the task of generating an accurate baseline assessment of the state of business integrity at the national level. In terms of content, a few chapters (Brazil, Italy) indicated that the media, political financing, and whistleblowing sections could be strengthened, the latter of which serves as a cross-cutting issue affecting both the private and public sectors. The Cambodia chapter had difficulty in applying the instrument because of the lack of several key laws, e.g., whistleblowing, lobbying, corporate transparency, etc in their national context, but they understood the scope of the BICA to be appropriate for assessing the state of business integrity in general. The methodology itself is considered a strong tool for this purpose, both because it is comprehensive in scope and because it is a rigorous investigation of areas for which there is little existing evidence.

Overall, chapters felt that the BICA framework produced an accurate baseline assessment, though some chapters had reservations about the extent to which they were able to generate accurate data given their resource envelope (Kenya, Trinidad). The Malaysian chapter was concerned that the dominance of government-linked companies was not fully captured in the BICA assessment.

On the whole, chapters felt that the BICA produced relevant information for a reform agenda. However, some countries experienced moments of political and economic instability during the data collection process, thus rendering some of the data irrelevant for new circumstances once the shock had passed.

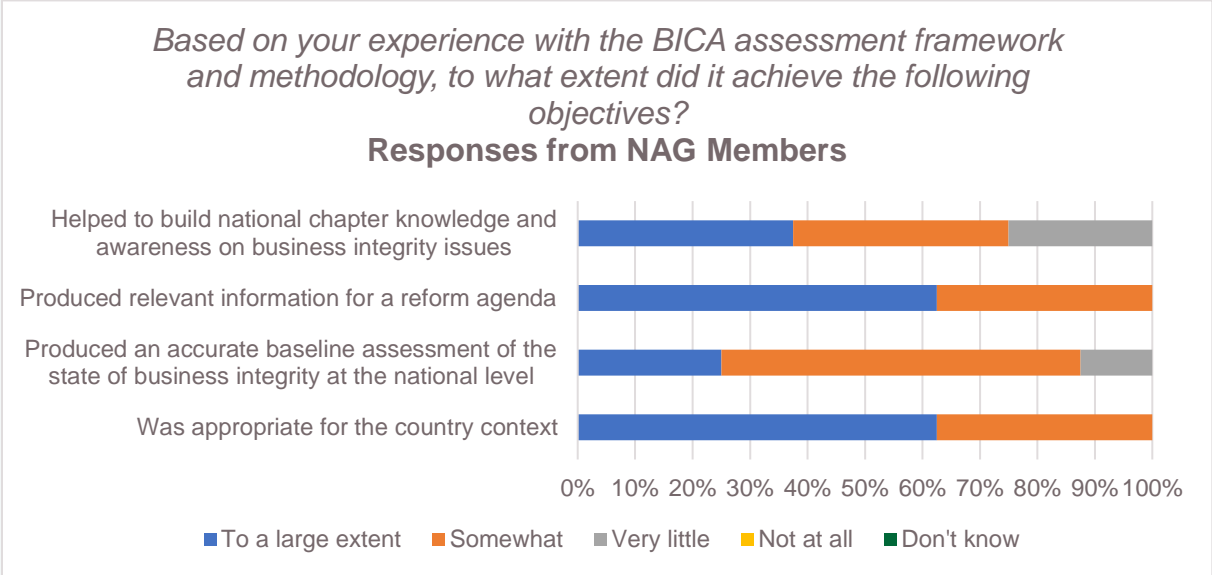
Figure 2: Extent of objectives achieved Part 1, Survey results from chapters



NAG Members' opinions on the usefulness of the BICA assessment framework generally reflected the opinions of chapters, though their responses were more conservative in their estimation of whether objectives had been successfully achieved. Responses between the two groups differed most significantly in whether the BICA assessment helped to build chapter knowledge and awareness, though

it is unclear how well NAG members would be able to judge this indicator. There was also a differential regarding whether the BICA produced an accurate baseline assessment of business integrity.³

Figure 3: Extent of objectives achieved Part 1, Survey results from NAG Members



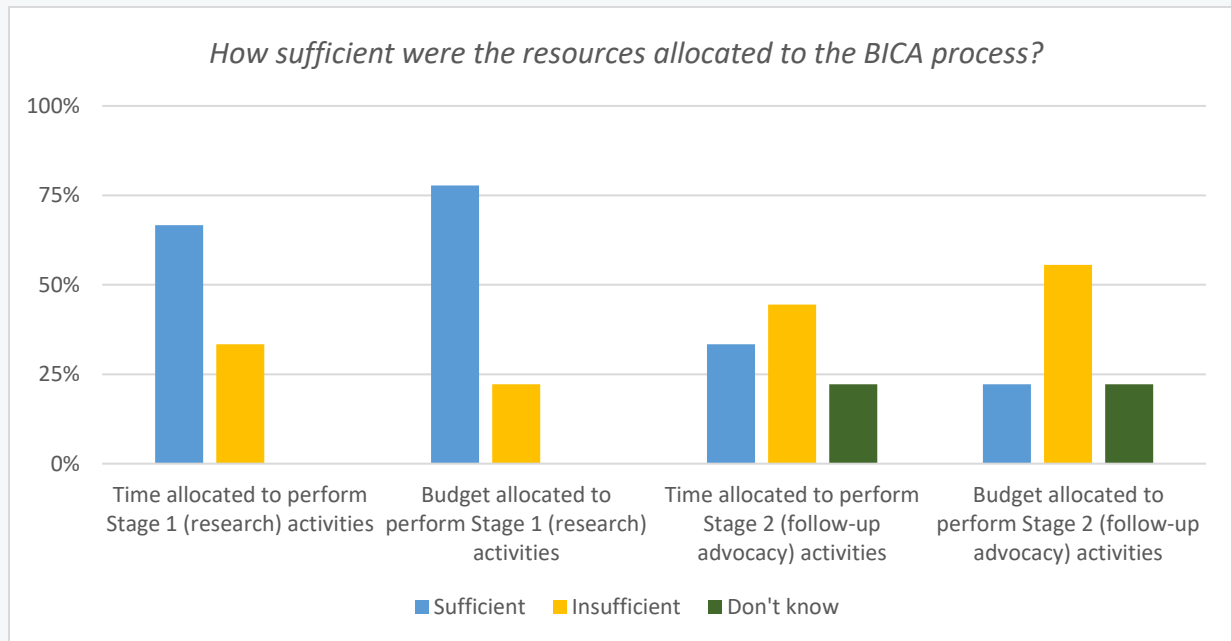
Chapters agreed that the BICA was an excellent tool for systematically identifying and organizing information related to business integrity, as a means of building credibility in the data collected and TI’s resulting analyses. For the most part, chapters indicated that the application of the BICA methodology generated information that confirmed their a priori understanding of the strengths and weaknesses of the private sector with regards to corruption risk. Thus, the BICA is not about revealing a misunderstood or unknown status quo. Its most important outcome in this context is the ability to generate a long-term, accurate, and credible evidence base for the development of strategy and advocacy activities.

The BICA also substantially improved the knowledge base of staff in national chapters, particularly those that worked on the implementation of BICA. This is true even in the case of chapters that housed existing business integrity programs. One clear missed opportunity is the sharing of BICA findings across the workstreams of individual chapters, and the linkages that could lead to cross-sector collaboration. This allows findings to be used in all relevant workstreams, rather than being limited to one line of work stemming from BICA. However, in larger more established chapters such as Brazil, BICA findings were taken seriously across the chapter and integrated into the evidence base of other projects.

Generally speaking, resources for Stage 1 research were considered sufficient. However, several chapters struggled with the timing, due to both internal management issues and exogenous shocks such as political violence and election cycles. Because funding for Stage 2 was not guaranteed, most chapters have struggled with launching advocacy around their BICA findings. Larger chapters with a greater pool of resources, such as Italy and Brazil, have been able to incorporate findings into their activities with varying levels of success. Smaller chapters such as Mongolia and Mozambique have yet to begin any BICA-related advocacy.

³ Without interview data this result is difficult to interpret.

Figure 4: Sufficiency of resources, Survey results from chapters



An interesting finding of this review is that the *research process itself* strengthened and expanded the networks of individual chapters within the private sector. In Turkey, the chapter interviewed chambers of commerce around the country, and visited 12 large companies and 25 SMEs. In these interview sessions, chapters introduced TI work and its principles, which also served as capacity-building sessions for the interviewees. Most SMEs had significant knowledge gaps around ethics but understood the economic benefit of integrating themselves into larger, international supply chains with firms that require corporate governance policies on anti-corruption. In Italy, BICA research helped to strengthen existing relationships with the ministry of justice, ministry of public administration, the anti-corruption authority, law enforcement, and members of the national business integrity forum. The chapter in Cambodia took the opportunity to establish memoranda of understanding with business associations that were interviewed; these associations are major players in private sector governance. However, this benefit is a result of the Cambodian chapter staff being directly involved in the research process, rather than outsourcing the research effort to a consultant who will depart at the end of the contract. It is also based on the resources available to conduct interviews across a large geographic area, including areas with islands, and the ability of researchers to gain access to a variety of firms.

Opinions about the weaknesses of the BICA methodology were not shared across all chapters, though they provide insight into some of the challenges that all chapters faced during implementation. The comprehensive scope of the assessment framework was difficult to manage for both smaller chapters, and those chapters with a high number of active projects. It was also difficult to identify a core set of recommendations from the findings, since the scope was so broad. One chapter suggested that splitting up the assessment into three separate lines of investigation may be easier for implementation purposes. But this would complicate the identification of cross-cutting issues across the three major areas of assessment, and also magnify the project management responsibilities. In fact, a few chapters struggled with recruitment or hired researchers who did not meet expectations (Cambodia, Kenya, Malaysia) and were forced to recruit new researchers mid-way through the data collection period, or enlist chapter staff in the collection and analysis of data.

Another issue with the BICA methodology that was highlighted during interviews was the scoring process, and whether scores were meaningful. Chapters felt that scores were only useful to draw

attention to issues, while the substance of the matter was contained in the qualitative data and narrative for each indicator. Indeed, some chapters felt that neutral scores were more helpful than extreme scores for prompting interest from external stakeholders in the business integrity environment.

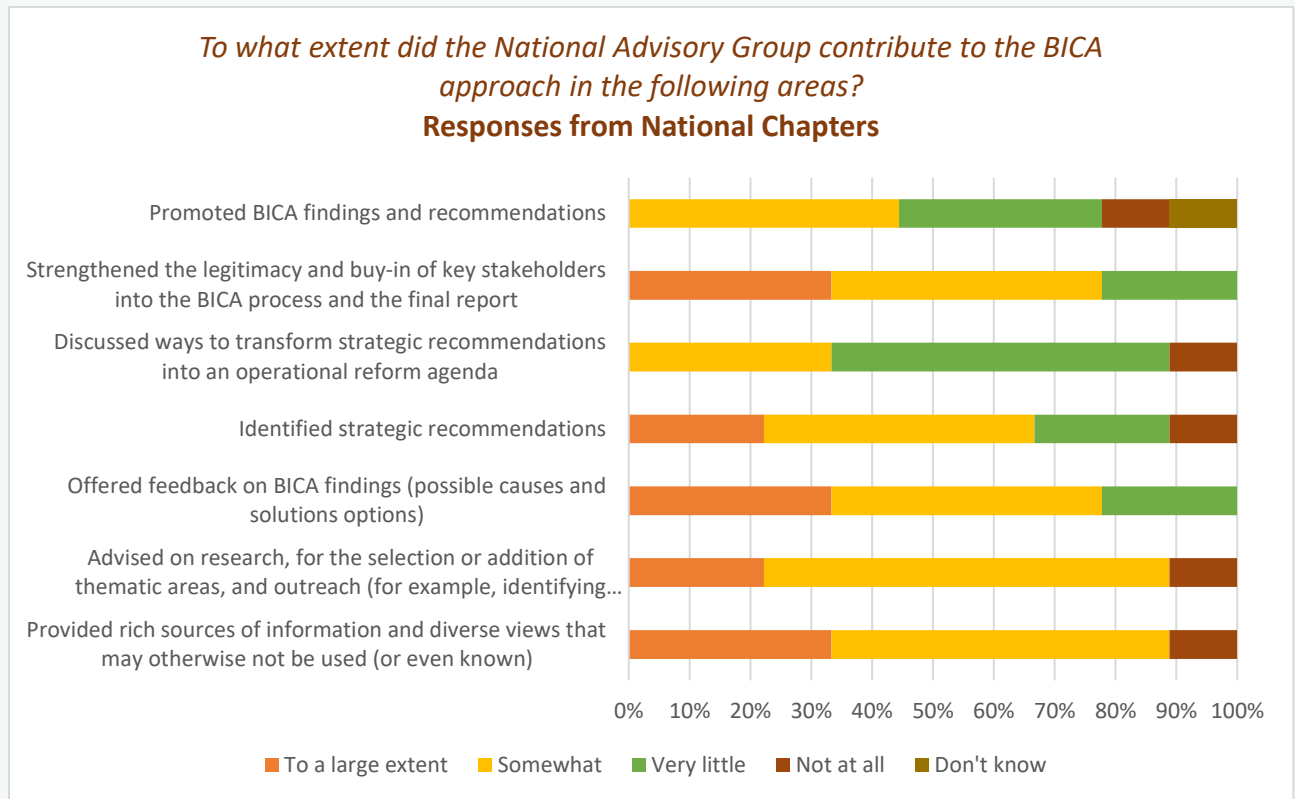
A. Multi-stakeholder approach

The multi-stakeholder approach was considered fruitful for most chapters. However, building a functional national advisory group (NAG) required enormous investments of time and energy that sapped the resources of smaller chapters. Chapters benefitted from prior contact with stakeholders working in the field of business integrity, particularly through successful projects or sustained efforts to build relationships prior to the advent of BICA. Collective action approaches that bring together actors from the public sector, private sector, and civil society may require a prolonged period of trust-building before NAG members are willing to share opinions and networks within the context of the advisory group setting.

Most chapters agreed that NAG members provided a diverse array of opinions, and well-informed discussion, as well as sources of information that may not have been otherwise accessible to researchers. In fact, the most often cited strength of the NAG in most countries was their assistance in gathering relevant information and gaining access to contacts for interviews. Without this kind of assistance from NAG members, the BICA methodology may not have yielded the high level of rigorous and credible information that it did.

However, NAGs were much less successful in providing constructive feedback on BICA findings and identifying strategic recommendations. Some chapters capitalized on their access to key NAG members for one-on-one feedback sessions, and direct commentary on data and analysis. Chapters also experienced various levels of legitimacy-strengthening through NAGs, with some NAGs providing very little buy-in from external stakeholders. One surprising finding of this review is that neither the NAGs, nor the individual NAG members, formed the foundation for Stage 2 activities. In fact, most chapters have found it difficult to decide how best to utilize the NAG once Stage 1 activities were completed.

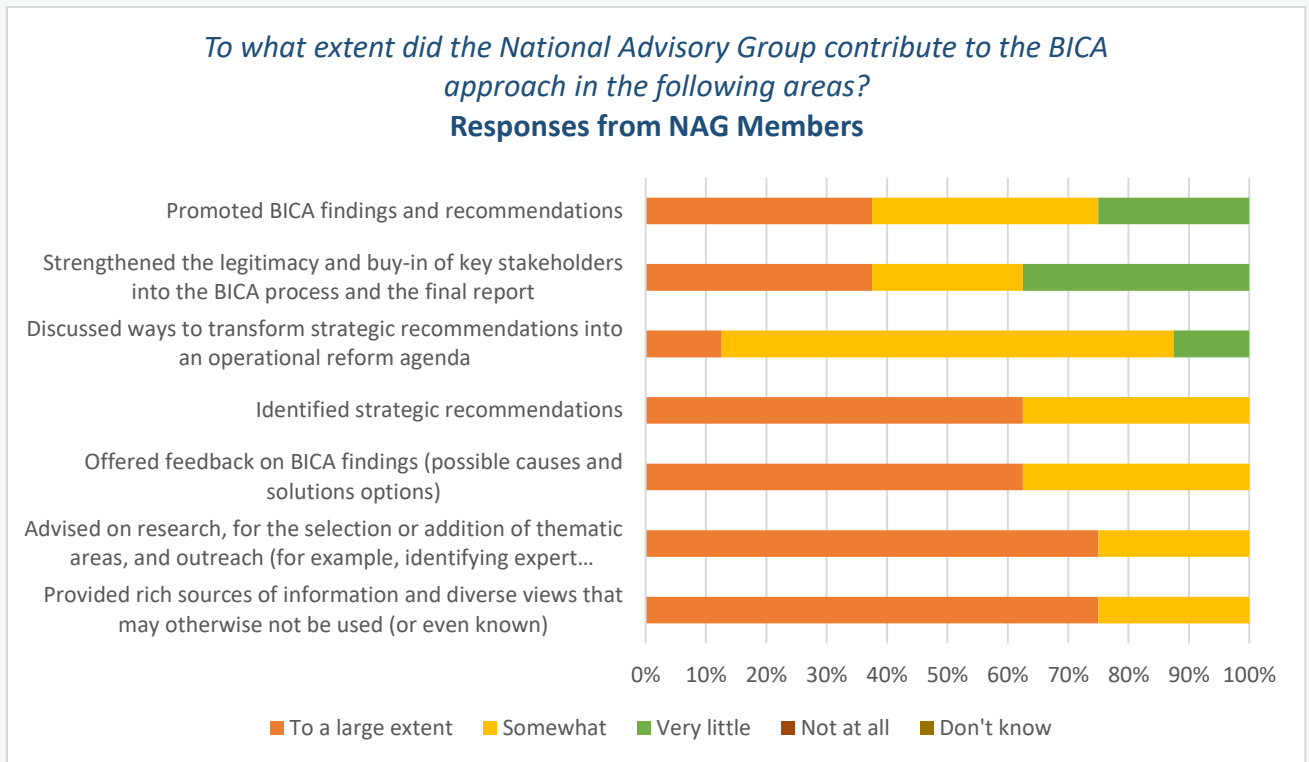
Figure 5: Contribution of National Advisory Groups, Survey results from chapters



The composition of NAGs was dependent on both the existing relationships that the chapters had forged prior to the BICA, and the relative stability of the country at the time of Stage 1. In some countries, media were notably absent from the NAG, while in other countries, government agencies were not interested in participating. The private sector was generally well-represented across all NAGs, however.

One interesting finding from this review is that NAG members, both those interviewed and those who responded to the survey, were pleased with their BICA experience. NAG members recognized the importance of the BICA findings to their work, and were generally committed to producing and disseminating the recommendations. Surprisingly, NAG members overestimated their contributions to the BICA process when compared with the responses from chapters, reaffirming that they were very satisfied with their roles within the BICA process.

Figure 6: Contribution of National Advisory Groups, Survey results from **NAG members**



VI. Findings: Advocacy

Few chapters have officially followed through to the advocacy stage, citing lack of funding and/or personnel as primary reasons for this failure. All chapters launched their BICA reports at well-attended events, and are regularly distributing the report and summary in a variety of contexts, e.g., training events, meetings, press interviews, conferences, panel events, etc. In addition, BICA reports in all countries have attracted attention from major actors, with regular mentions in the media, business forums, and in some cases, parliamentary addresses.

Several chapters have incorporated BICA findings into their existing chapter or business integrity strategies, but some chapters are engaging in ad hoc activities that are driven by their BICA experiences and findings, but have no overall strategy guiding the advocacy process.

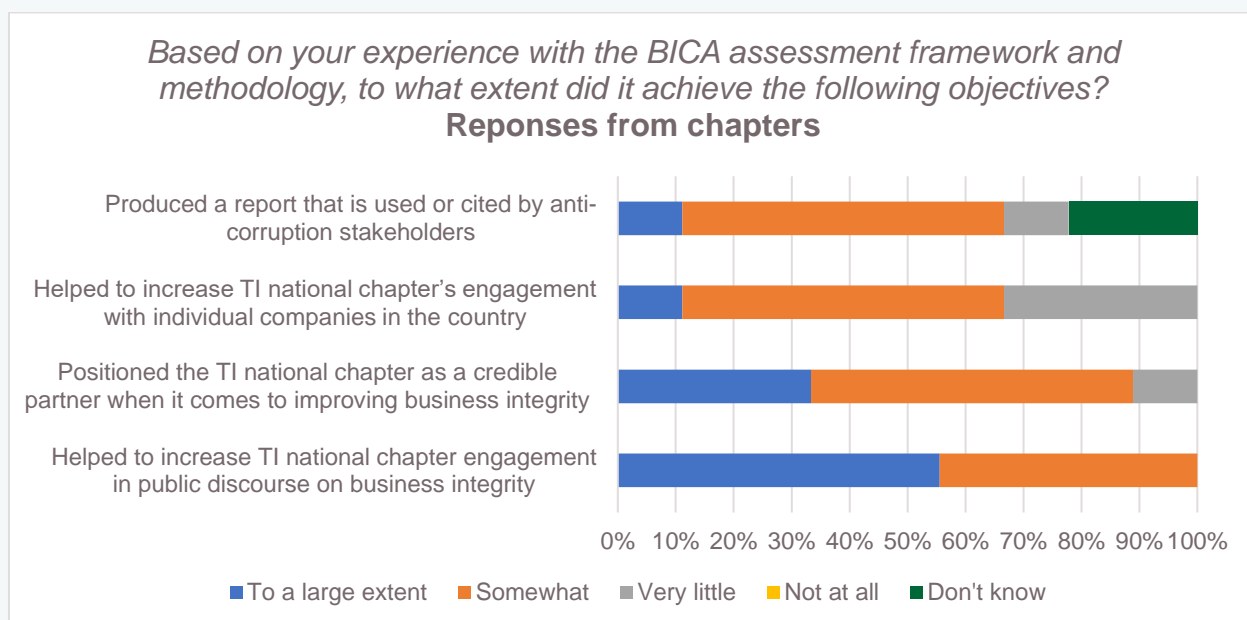
Table 2: Status of strategies related to BICA

Country	Report publication date	Status of BICA findings
Mozambique	February 2016	No strategy; Not incorporated into other strategies
Turkey	February 2017	Unclear, but definitely driving a number of activities
Italy	October 2017	Incorporated into other chapter strategies
Cambodia	November 2017	No strategy; Confirmed direction of existing strategies

Malaysia	December 2017	No strategy; Not incorporated into other strategies
Brazil	March 2018	Incorporated into other chapter strategies
Kenya	May 2018	Incorporated into other chapter strategies
Mongolia	May 2018	Incorporated into other chapter strategies
Trinidad and Tobago	December 2018	Too early to determine

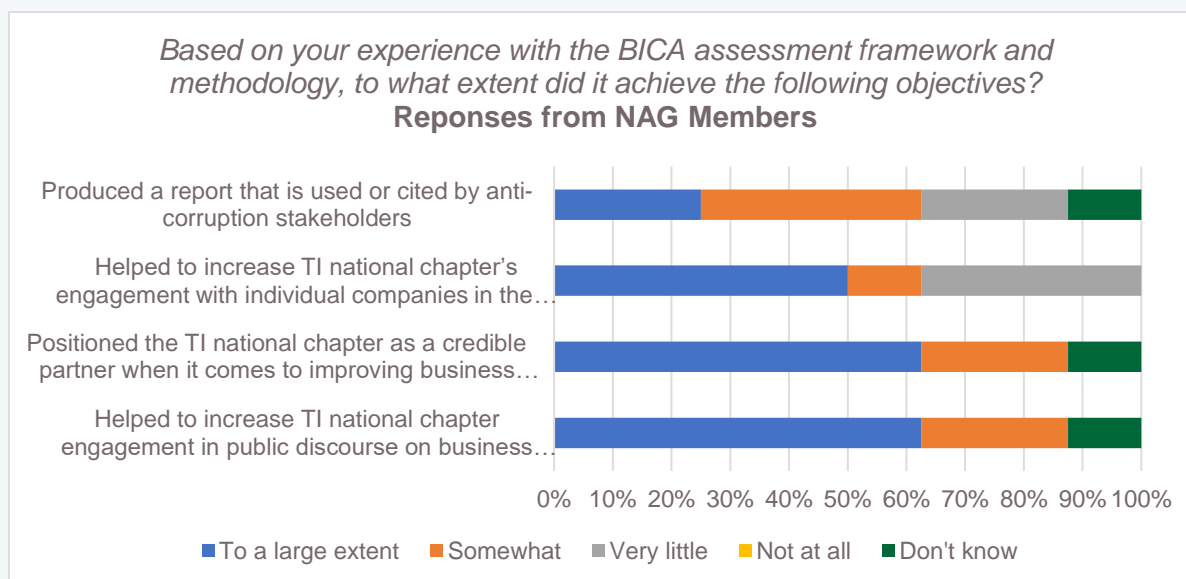
Chapters with previously-established relationships with external stakeholders did not find that the BICA positioned them as more credible partners or increased their engagement with individual companies. But all chapters benefited from expanding networks of relationships, and those chapters who did **not** have strong networks found that BICA helped them considerably in establishing new connections and network possibilities. However, it should be noted that chapters rarely focus on their relationships with individual companies. More generally, chapters forge relationships with business associations from specific industries, often the most powerful industries in the country, with chambers of commerce, business integrity forums, and other groups of private sector actors.

Figure 7: Extent of objectives achieved Part 2, Survey results from chapters



Chapters reported that external stakeholders expressed and demonstrated interest in the contents of reports and were impressed by the rigor and specificity of findings. The overall quality of reports was considered high by all chapters, though it is not clear how much uptake of the findings is based on the reports per se. Much of the discussion on business integrity in the press and other venues is based on the relationships that chapters have established or strengthened through the work with NAGs, their advocacy activities, or the launch events.

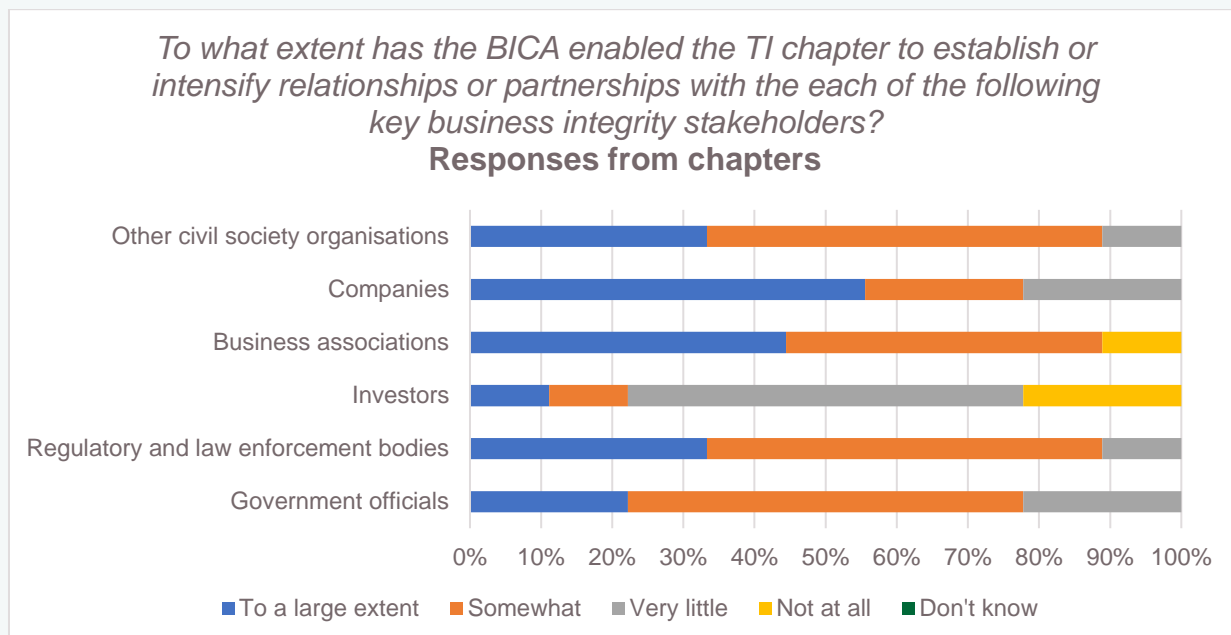
Figure 8: Extent of objectives achieved Part 2, Survey results from **NAG Members**



Survey results from NAG members generally reflected the findings from chapters, although NAG members felt that advocacy-related objectives for the BICA were achieved to a larger extent across the board.

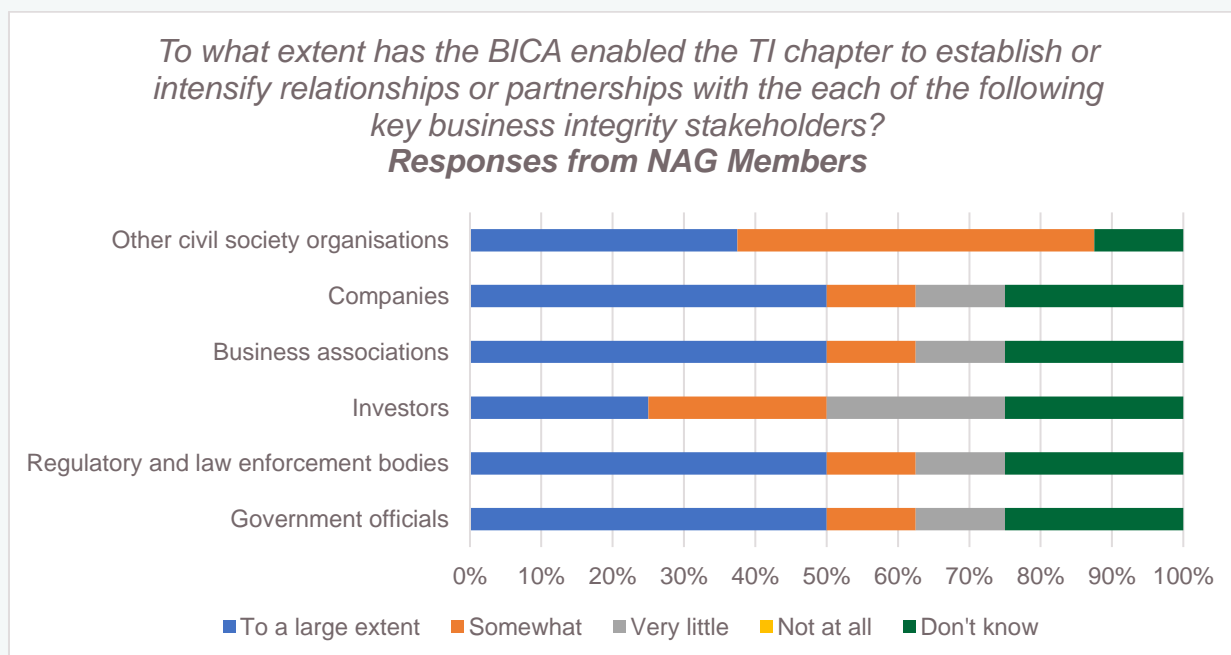
Although the BICA assessment framework has not resulted in stronger advocacy strategies for business integrity, it has served to strengthen and build chapter relationships with the private sector, and with actors who deal with the private sector on a regular basis. Indeed, chapters were most active in this sphere of work, regardless of the existence of a strategy.

Figure 9: Relationship-building with external stakeholders, Survey results from chapters



Survey results from NAG members again generally reflected the findings from chapters, although NAG members felt that relationship-building objectives for the BICA were achieved to a larger extent with regulatory and law enforcement bodies, and government officials.

Figure 10: Relationship-building with external stakeholders, Survey results from NAG Members



The chapter in Mozambique has focused on continuing their work in establishing integrity pacts with individual companies, using the BICA findings as further support for this effort. Certain members of the Mozambiquan NAG have also met regularly since the launch of the report to move forward, albeit

slowly, with the recommendations. This has been done independently and without leadership from the chapter. However, the chapter is currently in the process of signing a memorandum of understanding with this group to issue a public declaration of the work that has emerged (or may emerge) from BICA.

In Turkey, BICA findings are playing a prominent role in several lines of activity. Two other civil society organizations (TEPAV and TÜSİAD)⁴ have picked up on particular BICA recommendations and have started projects based on the BICA findings.⁵ External funding from foreign governments and foreign multinationals is also expected, with a focus on collective action and bringing together large businesses and SMEs. The Italian chapter found that several of the most important recommendations from its 2020 general chapter strategy were confirmed by the BICA findings, while other recommendations were added to the strategy as a result of BICA. The chapter decided to focus on five major recommendations from the BICA findings to streamline its activities, and also because other areas were already being addressed in related chapter workstreams.

Using their BICA findings, the Cambodia chapter was able to speak to major issues in the public discourse, such as corruption being revealed by increasing attention to tax collection. The chapter has also established a working relationship with the logistics industry on problems on customs and exports, which is a major challenge for an economy based on garment production.

In Brazil, the chapter has incorporated BICA into its overall strategy, with a specific plan to improve companies' practices based on the BICA findings. The Kenyan chapter incorporated aspects of BICA into their five-year strategy for private sector engagement and took the lead on procurement in TI-Africa because of the knowledge gained through the BICA. They are also engaging on reforms to beneficial ownership and commercial bribery, both of which were confirmed by BICA findings.

The Mongolia chapter integrated some of its BICA recommendations into their business sector strategy, specifically in the areas of private sector transparency, beneficial ownership disclosure, and public procurement. In Trinidad and Tobago, BICA findings confirmed some areas of work from the general 2020 strategy, particularly regarding activities to improve the level of transparency and ethics in private firms.

VII. Findings: Impact

It is much too early in this first cycle of BICA exercises to expect major impacts, and in fact, it is unlikely that there will be much clarity over the role of BICA findings in bringing about longer-term outcomes without rigorous impact evaluation.⁶ In addition, chapters are not formally tracking outcomes, which makes it difficult to understand how their activities are related to outcomes within a much wider context.

Because chapters were not asked to carefully substantiate their claims of outcomes, it is not clear that survey results accurately reflect the level of impact.⁷ Monitoring and evaluation exercises such as

⁴ TEPAV: Türkiye Ekonomi Politikaları Araştırma Vakfı (Economic Policy Research Foundation of Turkey); TÜSİAD: Türk Sanayicileri ve İşadamları Derneği (Turkish Industry and Business Association).

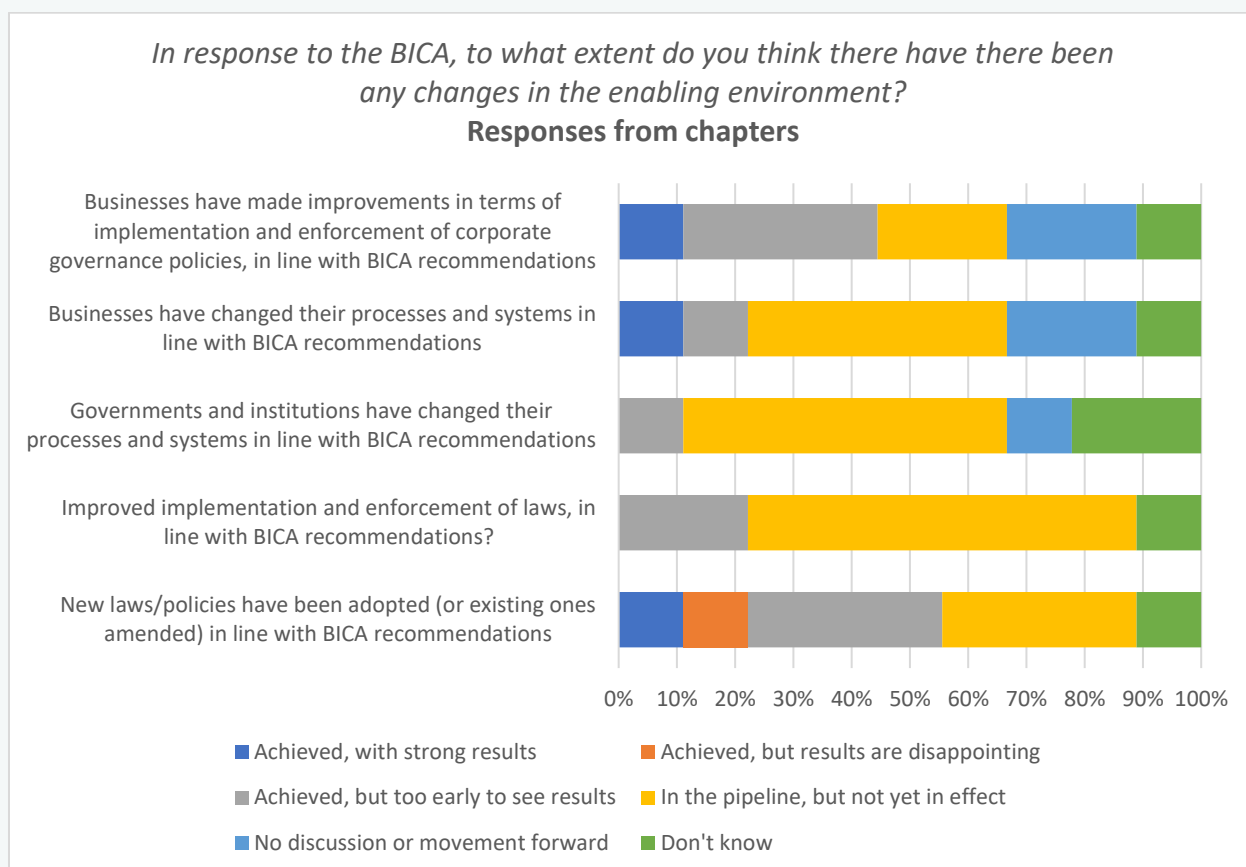
⁵ Possibly on informal economy and illicit trade, but TBD.

⁶ This need not be limited to be randomized controlled trials (RCTs), since qualitative exercises such as process tracing and outcome harvesting can also provide clear insights into outcomes.

⁷ There is also the possibility that various outcomes are attributable to the TRAC exercise, which in some countries was bundled with the BICA exercise.

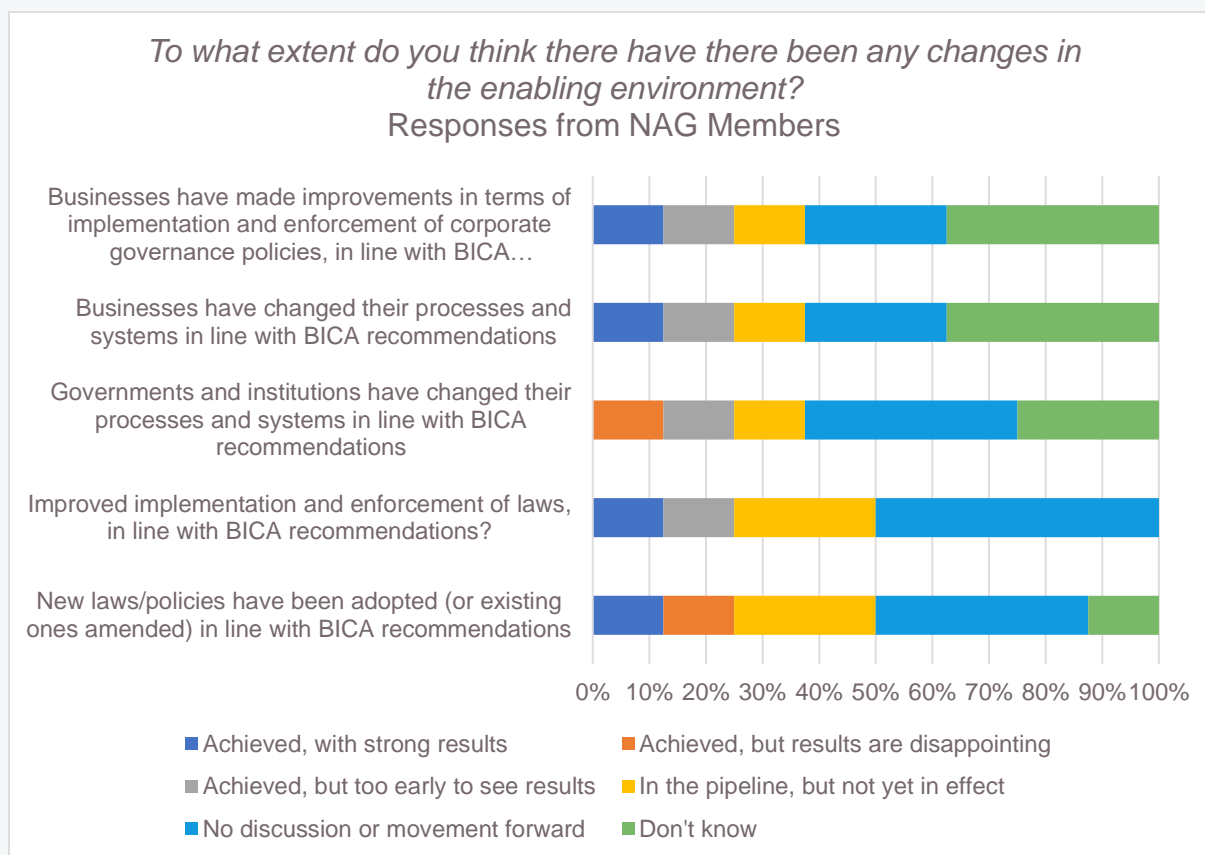
outcome harvesting are more suitable to capturing the outcomes of advocacy activities, but this kind of process is participatory and requires training and in-person convening. Some chapters are also still in the process of building relationships rather than advocating for reforms with specific and planned activities.

*Figure 11: Impacts of BICA, Survey results from **chapters***



Overall, findings from the survey revealed that chapters are optimistic about reforms that may come out of the BICA process, with a majority citing that reforms have either been recently achieved, or reforms are in the pipeline, but not yet in effect. By contrast, NAG members are more cautious about claiming the success of reforms.

Figure 12: Impacts of BICA, Survey results from **NAG members**



In fact, there is wide disparity in responses even among NAG members in the same country. This may be a result of not being closely involved with reform processes, or a result of political circumstances within a country, which can be interpreted differently depending on one's standpoint.

Figure 13: Impacts of BICA, Heat map of survey results from **NAG Members**

	Italy	Italy	Kenya	Kenya	Kenya	Malaysia	Malaysia	Mongolia
New laws/policies were adopted (or existing ones amended)								
Improved implementation and enforcement of laws								
Governments and institutions changed their processes and systems								
Businesses changed their processes and systems								
Businesses improved implementation & enforcement of corporate governance policies								

	Achieved, with strong results		In the pipeline, but not yet in effect
	Achieved, but results are disappointing		No discussion or movement forward
	Achieved, but too early to see results		Don't know

While outcomes may not rise to the level of impact as of yet, there are notable reforms in the pipeline in several countries, with some reforms being informed by BICA findings. Notable results include:

- **Turkey:** The public sector policy on economic governance is being revised with consideration of the BICA recommendations.
- **Italy:** There have been strong amendments regarding bribery in laws governing the private sector, both domestic and international. This process was supported and confirmed by BICA findings.
- **Malaysia:** Though a new law on corporate liability wasn't directly attributable to BICA, there are indications that the BICA report provided a final push after a long period of hesitation on the part of government. Discussion is also progressing on new acts on whistleblowing and media freedoms, supported by BICA findings.
- **Brazil:** The chapter has been drafting bills to be presented to congress, working to convince candidates to commit to legislation that was identified as gaps during BICA research. Work has also been done with companies to draft and support new legislation, with BICA recommendations serving as support to the process that has been ongoing.
- **Cambodia:** The chapter has been invited by business associations to draft and/or revise laws based on BICA findings, and has been working on building capacity of business associations of SMEs to lobby the government for these changes.
- **Kenya:** The chapter is participating in developing regulations for the bribery act on commercial bribery, and is adding BICA perspectives on the drafting of a new whistleblower protection act.

VIII. Conclusion and Recommendations

Although there is always concern with the level of *impact* that a new tool can produce, **this review exercise has revealed that the most important strength of the BICA assessment and methodology is its ability to establish and strengthen relationships that are the precursors to change.** Stage 1 activities, specifically the multi-stakeholder approach and the intensive qualitative research process, have allowed chapters to expand both their knowledge base and their network of potential partners across government, civil society, and the private sector. While stage 2 activities may not have officially been launched, advocacy activities have naturally emerged as a result of the relationship-building from Stage 1, and BICA findings are supporting a variety of reforms, initiated by chapter partners, chapters themselves, and outside actors that are often requesting to work with chapters and serve as potential connections in an expanding network.

Using the proposed theory of change as a guiding principle, the BICA framework is capable of generating outcomes in three spheres of activity that build on each other and reflect an expanding network of connections that are necessary for bringing about change. In the area of research, the number of actors is contained to the BICA team and NAG. This review has demonstrated that chapters were successful in generating rigorous and credible knowledge about the state of business integrity in a country, but were not (yet) able to capitalize on cross-sector collaboration based on the information produced. In terms of advocacy, the review highlights chapter success in building strengthened and expanded networks of relationships, primarily based on the aforementioned research process. They were less successful in generating strong advocacy strategies partly because of institutional challenges within the chapters, such as limited personnel and low funding. In terms of impacts, the review confirms that attribution is challenging, and systems change depends on a variety of actors and relationships.

However, it is possible to surmise that the BICA contributed to longer term outcomes in practices and policies based on the work of chapters to partner and engage with various actors.

Recommendations for strengthening the BICA assessment and methodology are as follows:

1. Revise indicators on media, whistleblowing and campaign finance with inputs from chapters. Also consider the role of state-owned enterprises or government-linked companies in the BICA assessment framework.
2. Provide support for Stage 2 activities, including assistance with securing funding and technical guidance on strategy development (or revision with new research) and use of NAG for action plan development.
3. Design monitoring and evaluation structures that capture outcomes in advocacy initiatives. Examples include outcome mapping and outcome harvesting.⁸ This should also include surveys of NAG members after key meetings during Stage 1 to determine their level of buy-in to the process, their level of satisfaction with the participatory process, and their understanding of the mechanisms of change.
4. Establish regular mechanisms for peer knowledge exchange, including convening events, mentoring opportunities, and webinars. In theory, this may remove some of the responsibility for guiding Stage 2 activities from the Secretariat.
5. Design a pre-BICA assessment to evaluate risks and opportunities in the enabling environment. In addition to identifying champions within certain sectors, this exercise should include reference to election cycles, recent political instability, economic shocks, or other exogenous factors that might impair the BICA research process. The resulting data can not only be used to decide if and when to conduct a BICA exercise, but also map stakeholders, accountability mechanisms, and power structures that can impede or facilitate subsequent BICA-driven reforms.⁹

⁸ See materials on monitoring and evaluation in complex environments by Root Change. Forthcoming.

⁹ See Accountability Ecosystems Approach by Brendan Halloran.

IX. Annexes

A. List of TI chapter interviews

Country	Chapter Interviewees	Date
Brazil	██████████, Business Integrity Programme Consultant, TI Brazil ██████████, BICA Project Consultant, TI Brazil	1-Nov-2018
Cambodia	██████ █████ █████, Business Integrity Program Coordinator, TI Cambodia	17-Dec-2018
Italy	██████ █████ █████, Executive Director, TI Italy Susanno Ferro, Communications Officer, TI Italy	29-Oct-2018
Kenya	██████████, BICA Programme Coordinator, TI Kenya	5-Nov-2018
Malaysia	██████████, Senior Executive, TI Malaysia	31-Oct-2018
Mongolia	██████████, BICA Project Manager, TI Mongolia	5-Nov-2018
Mozambique	██████████, Centre for Public Integrity	21-Nov-2018
Turkey	██████████, General Coordinator, TI Turkey	11-Nov-2018
Trinidad and Tobago	██████████ Chair, TI Trinidad and Tobago	13-Nov-2018

B. List of NAG interviews

Country	Sector	Date
Kenya	Civil society	21-Nov
Mongolia	Private sector	26-Nov

C. Survey Questions

Survey on BICA Assessment Framework and Methodology

This survey is being administered by an external evaluator at the request of the Transparency International Secretariat, with the goal of learning more about the effectiveness of the BICA Assessment Framework and Methodology. The survey should only take 5-10 minutes to complete. Be assured that all the answers you provide will be kept confidential, and providing your name and organization are not required. **Your participation in this survey is greatly appreciated and will inform any future revisions to the BICA approach of improving business integrity in countries around the world.**

Please click next to begin.

1. Country:

2. Role in the BICA Assessment:

- a. National TI Chapter
- b. Member of National Advisory Group
- c. Researcher

3. BICA progress: Stage 1 in progress, Stage 1 completed, Stage 2 in progress, Stage 2 completed, Don't know, Other

4. (Optional) Name of organization:

5. Based on your experience with the BICA assessment framework and methodology, to what extent did it achieve the following **objectives**?

	To a large extent	Somewhat	Very little	Not at all	Don't know
Was appropriate for the country context					
Produced an accurate baseline assessment of the state of business integrity at the national level					
Produced relevant information for a reform agenda					
Helped to build national chapter knowledge and awareness on business integrity issues					
Helped to increase TI national chapter engagement in public discourse on business integrity					
Positioned the TI national chapter as a credible partner when it comes to improving business integrity					
Helped to increase TI national chapter's engagement with individual companies in the country					
Produced a report that is used or cited by anti-corruption stakeholders					

Comments (optional):

6. How sufficient or insufficient were the **resources** allocated to the BICA process?

	Sufficient	Insufficient	Don't know
Time allocated to perform Stage 1 (research) activities			

Budget allocated to perform Stage 1 (research) activities			
Time allocated to perform Stage 2 (follow-up advocacy) activities			
Budget allocated to perform Stage 2 (follow-up advocacy) activities			

Comments (optional):

7. To what extent did the **National Advisory Group** contribute to the BICA approach in the following areas?

	To a large extent	Somewhat	Very little	Not at all	Don't know	I contributed in this area
Provided rich sources of information and diverse views that may otherwise not be used (or even known)						
Advised on research, for the selection or addition of thematic areas, and outreach (for example, identifying expert interviewees and workshop attendees)						
Offered feedback on BICA findings (possible causes solutions options)						
Identified strategic recommendations						
Discussed ways to transform strategic recommendations into an operational reform agenda						
Strengthened the legitimacy and buy-in of key stakeholders into the BICA process and the final report						
Promoted BICA findings and recommendations						
Increased national chapter's network and contacts						

Comments (optional):

8. To what extent has the BICA enabled the TI chapter to **establish or intensify relationships or partnerships** with the each of the following key business integrity stakeholders?

	To a large extent	Somewhat	Very little	Not at all	Don't know
Government officials					
Regulatory and law enforcement bodies					
Investors					
Business associations					
Companies, both private and public sector firms					
Other civil society organisations					

Comments (optional):

9. In response to the BICA, to what extent do you think there have been any **changes in the enabling environment**?

	Achieved, with strong results	Achieved, but results are disappointing	Achieved, but too early to see results	In the pipeline, but not yet in effect	No discussion or movement forward	Don't know
New laws/policies have been adopted (or existing ones amended) in line with BICA recommendations						
Improved implementation and enforcement of laws, in line with BICA recommendations?						
Governments and institutions have changed their processes and systems in line with BICA recommendations						
Businesses have changed their processes and systems in line with BICA recommendations						
Businesses have made improvements in terms of implementation and enforcement of corporate governance policies, in line with BICA recommendations						

Comments (optional):

10. Have there been any negative consequences or unexpected positive outcomes of the BICA project?

- a. Yes
- b. No
- c. Don't know.

Please briefly explain:

Thank you for your participation. Please feel free to provide your name and email address if you would like to be contacted for interview.



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