



# IACC MONITOR: Anti-Corruption Commitment Monitoring Tool

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**Methodology and implementation guidelines**

The International Anti-Corruption Conference (IACC) is the world's premier global forum for bringing together heads of state, civil society, the private sector and more to tackle the increasingly sophisticated challenges posed by corruption. Established in 1983, the IACC takes place usually every two years in a different region of the world, and hosts from 800 to 2000 participants from over 135 countries worldwide.

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ISBN: 978-3-96076-141-9

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# Introduction

## Purpose of IACC Monitor

The 18th International Anti-Corruption Conference (IACC), held in Copenhagen, featured a series of high-level meetings among Organisation for Economic Co-operation and Development (OECD) and non-OECD countries and international and regional organisations. Participants made a set of statements on the steps each intend to take to make progress in anti-corruption, based on existing commitments (such as Open Government Partnership (OGP) action plans, the UK Anti-Corruption Summit, United Nations Convention Against Corruption (UNCAC), OECD instruments and the Sustainable Development Goals (SDGs)). This resulted in a set of 19 national-level statements and 10 organisational statements (see: <https://iaccseries.org/18th-iacc/18th-iacc-high-level-segment-commitments/>). Together these statements contain more than 300 individual anti-corruption commitments.<sup>1</sup>

Participants at the high-level meetings agreed to set up a follow-up mechanism coordinated by Transparency International, engaging all stakeholders (including governments, international and regional organisations, companies and civil society) in monitoring the implementation of these commitments. This tool presents a methodology for applying such a follow-up mechanism for commitments made by countries and international organisations.

<sup>1</sup> CAVEAT: It is important to note that the exact definition of what constitutes a commitment, and therefore the exact number of commitments, is to some extent subjective, due to the wording of the country and organisational statements. This is because some statements include descriptions of a country or organisation's anti-corruption achievements, make general statements of support for certain principles or refer to existing anti-corruption frameworks. Because statements are not presented in a consistent format, it is also sometimes difficult to ascertain whether a particular affirmation is a concrete commitment or a statement of principle or values. For this reason, the monitoring framework presented in this tool includes an additional filtering step to identify commitments which are sufficiently specific and measurable to be monitored.

The aims of the follow-up mechanism are:

- to assess the level of progress in implementation of the commitments
- to provide further analysis of – and complement – other reporting mechanisms
- to focus on the qualitative nature of commitments, rather than quantitative scoring or ranking
- to provide insights into what has and has not worked, and why
- to provide insights into the opportunities and challenges for implementation, as a basis for understanding where future technical support should be targeted.

The follow-up mechanism aims to capture the context and conditions in which commitments are being implemented, as well as progress in implementation of the commitments themselves. It is not designed to compare commitment implementation across countries or organisations, or as the basis for any kind of index. Rather, it is designed to support the development of recommendations on how commitment implementation can be accelerated under existing conditions.

It will also serve as a basis for reporting or addressing new initiatives, including new commitments made by countries and international organisations.

This tool presents a step-by-step guide to applying the methodology, including guidance on both project management and research methodology.

# Research management

## Key steps in the monitoring process

The Transparency International Secretariat will provide overall coordination, technical assistance and quality support, to ensure consistency across countries. In most cases, the monitoring of commitments for each of the 19 countries will be conducted by the Transparency International national chapter in the respective country (where a chapter exists). Where a chapter does not exist or is not in a position to conduct the monitoring, this may be performed by a partner non-governmental organisation in the country, a country expert or the Transparency International Secretariat.

An advisory group will be composed of representatives of other anti-corruption initiatives (e.g. UN Development Programme (UNDP), OECD, UN Office on Drugs and Crime (UNODC), OGP, UK Anti-Corruption Summit) to ensure quality, build on existing monitoring initiatives and provide input on methodology, decisions and interpretations.

While the Transparency International Secretariat and national chapters will be responsible for overall coordination of the monitoring process, the mechanism is designed to allow active engagement of a range of parties. The key steps in the monitoring process are as follows:

01. For each country, a lead Transparency International national chapter or a local researcher with support from the Transparency International Secretariat is identified to collect data on implementation of each of the commitments. Research can be conducted in-house or outsourced.
02. The coordinating entity or researcher conducts a brief stakeholder mapping and develops a simple research plan (see below for further details).
03. The researcher filters the commitments to identify which are feasible to monitor (see Step 1 below).
04. The researcher shares the results of the filtering exercise with the relevant authorities in each country for verification. At this stage, the authorities can provide further clarity on the wording of their commitments. This applies both to commitments which have been filtered out and those selected for monitoring. If the authorities can provide further details on the wording of the commitments, the results of the filtering may be modified accordingly, as long as there is sufficient evidence for doing so. The additional detail can also be taken into consideration when assessing progress on commitment implementation, providing there is sufficient evidence (see Step 3 below).
05. The researcher then conducts an analysis of the country-level context and an assessment of progress on each of the selected commitments – including challenges to, and opportunities for, implementation – using the monitoring framework presented below.
06. Once the assessment has been completed, the results are again shared with the relevant authorities for validation. The results should also be shared at this stage with a selection of other in-country stakeholders, such as civil society organisations (CSOs), private-sector actors or thematic experts (in the case of country-level commitments), giving them opportunity to provide their perspective and suggest changes. Depending on the available resources, the coordinating entity should consider organising a meeting or workshop bringing together different stakeholders to validate the findings.

- o7. The results of the assessments of progress across all countries are cross-checked and validated by the Transparency International Secretariat to ensure quality and consistency of approach.
- o8. The country-level findings are shared with the advisory group for comment and clarification.
- o9. The country-level findings are published on a publicly available online platform.

For monitoring commitments made by international organisations, the Transparency International Secretariat will perform the coordination role. The monitoring process will follow the relevant key steps described above as part of the country monitoring process.

## Outputs

Once finalised, the findings will be presented in the form of short national-level and organisational-level reports, highlighting the main areas of progress, the reasons for any delays or changes in priorities, and the challenges to and opportunities for accelerating progress. A report template will be shared with the coordinating entities for completion.

It will also be possible to conduct an overall analysis of the results of the first round of monitoring by thematic area across all countries and organisations. This will provide cross-cutting insight into the level of progress across thematic areas, as a basis for developing high-level recommendations on how progress can be accelerated and where support is most needed.

All country-level and organisational-level commitments, data and progress results, as well as the cross-cutting thematic analysis, will be published on a publicly available online platform.



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## Timeline

In order to test the monitoring methodology and learn lessons for its subsequent improvement, the tool will first be piloted among a select number of countries and organisations that made commitments at the 18th IACC in 2018. Monitoring would subsequently take place on an annual or biannual basis for all participating countries and organisations, with scope for countries and organisations to amend, add or drop commitments as anti-corruption priorities evolve.

## Engaging stakeholders

In order to ensure that the follow-up mechanism is legitimate and the results are acted on, it is critical to engage a range of stakeholders from an early stage. Once the coordinating entity has been identified for each country and organisation, they should conduct a brief stakeholder mapping, bearing in mind the nature and subject matter of the commitments. They should then contact the relevant authorities, CSOs, local experts and private-sector actors to inform them of the monitoring process, timeline and opportunities for them to contribute. At this stage, it might be worth considering sharing with them the full monitoring methodology and any accompanying explanatory or promotional materials.

A key opportunity for engagement is the proposed stakeholder validation workshop. This aims to enable a range of different stakeholders to provide their perspectives on the findings once the assessment has been completed, before the results are published (see: "Guidance on Validating Findings", below). If a stakeholder workshop is not possible (e.g. because of resource constraints) or where a particularly important stakeholder group cannot attend, stakeholders should be given the opportunity to provide written feedback on the findings. This would ideally be made public alongside the findings.

In some cases, the coordinating entity may also choose to involve stakeholders (in addition to the relevant authorities in the respective countries or organisations) at the commitment filtering stage. This is optional and will depend on available resources and the extent to which they deem this step to add value to the process.

# Monitoring commitments

For each country or organisation, the monitoring process involves three steps:

- **Step 1:** Commitment filtering
- **Step 2:** Context analysis
- **Step 3:** Monitoring progress on individual commitments.

## STEP 1:

### Commitment filtering

The first step is to filter the commitments according to whether they can feasibly be monitored. Those which are not deemed feasible for monitoring will be excluded. The filtering of commitments will be based on the following:

- **Specificity:** Does the commitment target a specific area for action?
- **Measurability:** Does the commitment include actions that can be monitored or, at a minimum, include indicators of progress?

A review of the commitments reveals that they are **all relevant** in one way or another to the broader anti-corruption agenda, therefore the criterion of relevance is not included for filtering. (It may be that commitments are more or less relevant to the specific anti-corruption needs and priorities in a particular country or organisational context, and more or less consistent with other anti-corruption commitments, but this is a matter for the country or organisational-level assessments – see below). At the same time, very few of the commitments are timebound, therefore this criterion is also not included.

### 1.1 General principles for filtering

- In order to be considered feasible, a commitment must meet both criteria (**specificity** and **measurability**). The thresholds for meeting these criteria are intentionally low. If a commitment is considered borderline on one or both criteria it should be included in the assessment. Equally, if a commitment is considered to contain some degree of specificity or measurability, but not to be fully specific or measurable, it should also be included. If it is subsequently discovered through the assessment process that it is not feasible to monitor the commitment, it can be removed at that stage.
- Once the filtering process has been completed, the results are shared with the relevant authorities in the respective countries or organisations for verification. At this stage, the authorities should be given the opportunity to provide further clarity on the commitment wording and related activities, especially (but not exclusively) for those commitments which are considered borderline or have been excluded due to lack of specificity or measurability. If the authorities can provide further details on the wording of the commitments, this can be considered, as long as it is supported by written evidence. At this stage, the authorities should also be alerted to the fact that they will be contacted again to request evidence of progress on commitment implementation (see Step 3 below).
- Where commitments make reference to existing mechanisms, policies or instruments (e.g. UNCAC reviews, the Addis Tax Initiative), but do not include details of what these initiatives entail in the commitment text, the researcher may

refer to other sources of these details, as a basis for filtering. In such cases, it is recommended that researchers seek clarification from the relevant authorities on the exact contribution the commitment is expected to make to such mechanisms, policies or instruments.

- Where a commitment makes reference to an initiative, policy or instrument which had already been established at the time of the commitment's formulation, this may still be considered feasible for monitoring, as long as commitment implementation is ongoing at the time of monitoring (e.g. "We will continue to do X...").
- The results of the filtering step will be made public via the online platform.

**1.2 Commitment-specific guidance for filtering**

The following table provides more detailed guidance on assessing the feasibility of commitments according to the two criteria:

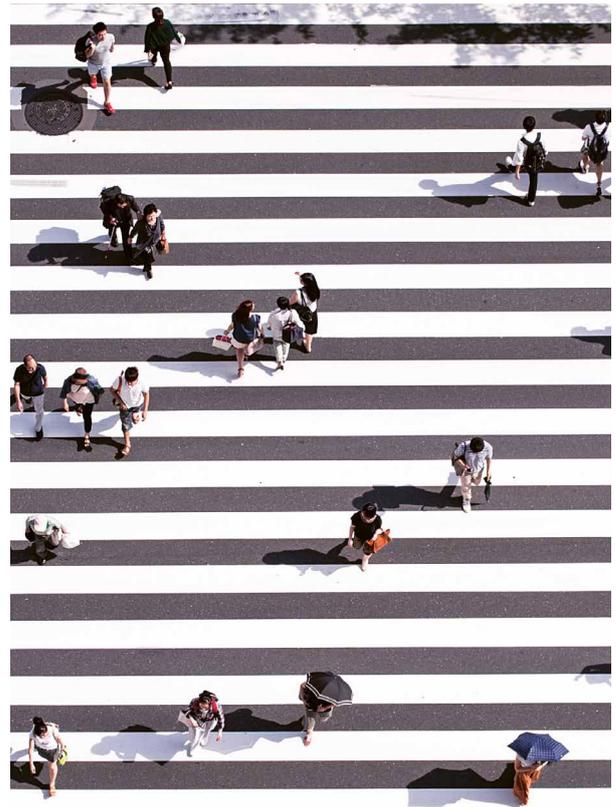


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**A SPECIFICITY:**

IS THE COMMITMENT SPECIFIC ?	YES
	<p>The commitment targets a concrete and sufficiently narrow policy area or anti-corruption mechanism (e.g. a thematic priority or a policy instrument)</p> <p><b>and/or</b></p> <p>The commitment moves the country or organisation towards achieving recognised international standards in the area of work, e.g. beneficial ownership or open contracting standards. (Where there is specific mention of such standards, the commitment can be considered specific enough to be included, as the standard itself would define what is expected).</p> <hr/> <p><b>Examples:</b></p> <p><i>"Establish the Anti-Corruption Commission with a mandate to research and provide policy advice related to anti-corruption efforts"</i> — Afghanistan</p> <p><i>"Ensure the independence and effectiveness of the anti-corruption agency as deemed by the articles 6 and 36 of UNCAC by implementing the Jakarta Principles, including improving the capacity of Indonesia's anti-corruption agency"</i> — Indonesia</p>

## IS THE COMMITMENT SPECIFIC ?

## NO

The commitment is a general statement of intent or support to reduce corruption or strengthen anti-corruption

**and/or**

The commitment is merely a description of the existing anti-corruption framework (or part of it)

**and/or**

The commitment does not identify a concrete policy area or mechanism

**and/or**

The commitment makes reference to action to be taken by a third party (e.g. another country).

**Examples:**

*"Sweden supports the Extractive Industries Transparency Initiative (EITI)"*

— Sweden

*"Georgia is committed to further increase access to public information"*

— Georgia

*"Ukraine remains committed to continue creation of corruption prevention mechanisms, by consistently implementing the initiatives and innovative technologies that made state authority and business more transparent and accountable to society"*

— Ukraine

*"Norway supports the outcomes of the OECD BEPS [base erosion and profit sharing] project and urges countries to implement the internationally agreed measures through the Inclusive Framework on BEPS"*

— Norway

*"We encourage all states to criminalise the bribery of domestic and foreign officials and to actively enforce those laws"*

— USA

**B MEASURABILITY:**

## IS THE COMMITMENT MEASURABLE ?

## YES

The commitment identifies clear, measurable actions and deliverables

**or**

The commitment identifies actions that can be construed as measurable, but which may require some interpretation.

**Examples:**

*"[We will develop] Integrity guidelines for better compliance with sections 22 and 23 of Law 27 401 on Criminal liability of Legal Persons"*

— Argentina

## IS THE COMMITMENT MEASURABLE ?

*"Australia will strengthen its ability to prevent, detect and respond to corporate crime, particularly bribery of foreign public officials, money laundering and terrorism financing, by strengthening relevant legislation including the Criminal Code Act 1995 and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006"*

— Australia

**NO**

The commitment does not identify any measurable actions to indicate whether it will have been achieved

**and/or**

The language of the commitment is non-committal (e.g. "we will discuss", "we will consider", "we aim").

**Examples:**

*"There is the need to increase collaboration among the anti-corruption institutions and also with Civil Society Organisations and the media"*

— Ghana

*"Australia will continue to consider and assess all options for strengthening the national anti-corruption framework, in order to fill any current gaps and better communicate that framework"*

— Australia

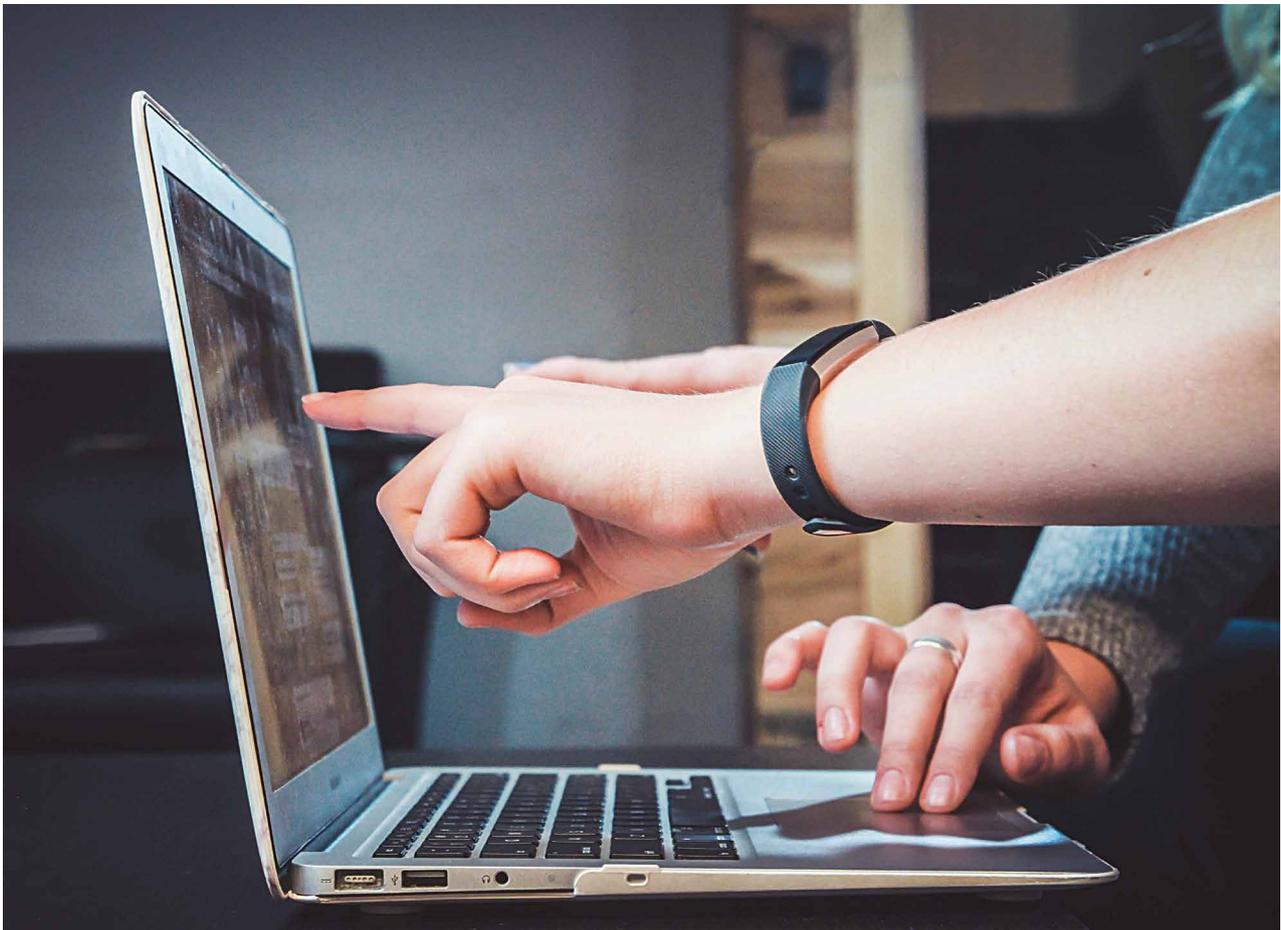


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**STEP 2:****Context analysis**

Once the commitments have been selected for assessment, the next step is to conduct a brief context analysis.

**2.1. Country context**

For countries, this would be in the form of a brief description (maximum two pages) of contextual factors which may support or hinder anti-corruption progress in the country generally. In particular, the analysis should aim to identify the extent to which the commitments are:

- pertinent to the country context
- consistent with the country's anti-corruption priorities
- sufficiently ambitious, given the governance context.

The country context analysis should consider the guiding questions below. Where possible, suggested sources are provided to support the analysis and ensure a strong evidence base.<sup>2</sup>

**1. What are the major corruption and governance challenges in the country?****How corrupt is the country considered to be?**Potential sources:

- The country's ranking on Transparency International's *Corruption Perceptions Index* (<https://www.transparency.org/research/cpi/overview>)
- The percentage of people who think corruption increased in the previous 12 months, according to Transparency International's *Global Corruption Barometer* (<https://www.transparency.org/research/gcb>)

Potential regional sources:

- *Africa Integrity Indicators* ([https://aai.globalintegrity.org/scores-map?stringId=transparency\\_accountability&year=2019](https://aai.globalintegrity.org/scores-map?stringId=transparency_accountability&year=2019))
- *Ibrahim Index of African Governance* (<https://mo.ibrahim.foundation/iiag>)

**Are there any economic sectors, social sectors or areas of government which are considered particularly vulnerable to corruption?**Potential sources:

- The percentage of people who paid a bribe to obtain a range of government services in the previous 12 months, according to Transparency International's *Global Corruption Barometer* (<https://www.transparency.org/research/gcb>)
- The percentage of people who think that most or all people in a range of groups or institutions are involved in corruption, according to Transparency International's *Global Corruption Barometer* (<https://www.transparency.org/research/gcb>)

**To what extent is there space for civil society and the media to operate freely (including freedom of expression, association and assembly)?**Potential sources:

- The status of political rights and civil liberties according to the Freedom House *Freedom in the World Report* (<https://freedomhouse.org/report/freedom-world/freedom-world-2018>)
- The status of civic space according to the *CIVICUS Monitor* (<https://monitor.civicus.org/>)
- The extent to which the country has free and independent media, according to Freedom House *Freedom and the Media Report* (<https://freedomhouse.org/report/freedom-media/freedom-media-2019>)
- The World Bank's *Doing Business* score (<https://www.doingbusiness.org/>)

<sup>2</sup> The Transparency International Secretariat's Anti-Corruption Helpdesk can provide a non-exhaustive list of research sources for country profiles.

## 2. How well is the government considered to be performing in the fight against corruption overall?

Potential sources:

- The percentage of people who think their government is doing badly or well in tackling corruption, according to Transparency International's *Global Corruption Barometer* (<http://gcb.transparency.org>)
- The country's percentile rank for Control of Corruption according to the World Bank's *Worldwide Governance Indicators* (<http://info.worldbank.org/governance/wgi/#home>)

**Have there been other commitments to strengthen the legal framework, policies or institutions that are relevant to anti-corruption? Has the government allocated resources to these commitments? Examples may include improvements in the legal framework, new policies and the establishment or strengthening of anti-corruption or oversight bodies. If so, provide examples and sources.**

## 3. Are commitments being undertaken in the context of a well-developed anti-corruption framework?

**What are the major gaps in the anti-corruption laws, regulations and institutions in the country?**

Potential sources:

- The country's key anti-corruption legislation as presented in the Business Anti-Corruption Portal's country profiles (<https://www.ganintegrity.com/portal/country-profiles/>)

**Has the country adopted a national anti-corruption plan or strategy?**

## 4. Are the overall commitments relevant to the country governance context and existing anti-corruption agenda?

**To what extent do the IACC commitments address the vulnerable sectors and areas identified under question 1 above?**

**To what extent do the commitments align with the country's anti-corruption plan, strategy or priorities as identified under question 2 above?**

**Do the commitments cover a broad range of thematic areas or are they clustered under a small number of areas?**

**To what extent can the set of commitments as a whole be considered sufficiently ambitious, given the above?**

### 2.2. Organisational context

For organisations, the context analysis should focus on the kind of work the organisation is mandated to do, the extent of its existing anti-corruption work and the focus of this work. As far as possible, the researcher should identify the level of resources allocated to anti-corruption work within the organisation. This should differentiate between internally focused anti-corruption safeguarding work (such as risk assessments and due diligence) and external anti-corruption programming and activities.

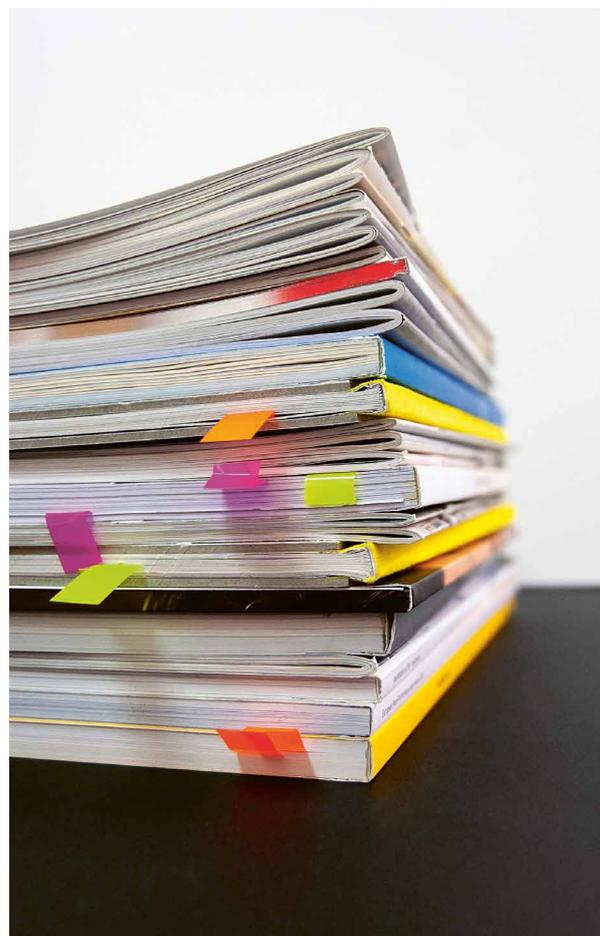


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**STEP 3:**

**Monitoring progress on individual commitments**

The third step is for the Transparency International Secretariat and national chapters to conduct an assessment of the individual commitments selected through the filtering stage. For each commitment, the analysis should aim to identify:

- The level of progress in commitment implementation
- The challenges to commitment implementation (where a commitment has not yet been fulfilled or is ongoing)
- The opportunities to accelerate commitment implementation.

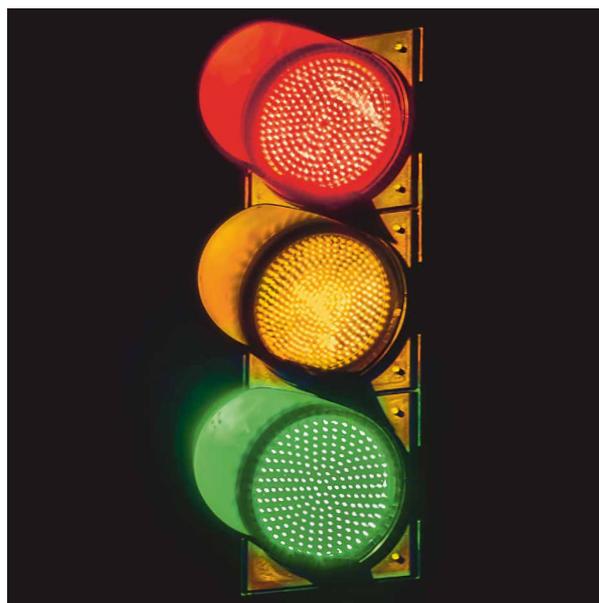


Photo by Harshal Desai on Unsplash

**TEMPLATE FOR ASSESSING PROGRESS ON COMMITMENT IMPLEMENTATION**

<b>THEMATIC AREA</b>	<i>E.g. Beneficial ownership (See Annex for full list of thematic areas)</i>									
<b>Commitment wording</b>	<i>As presented in country or organisational statement</i>									
<b>Timeframe start and end date</b>	<i>As presented in country or organisational statement, where stated (Where not stated, assume October 2018 -March 2020)</i>									
<b>Commitment source</b>	Is this commitment (in full or in part) included elsewhere?	OGP Action plan		UK Anti-corruption summit		National Anti-corruption plan		Other (If yes, please state which)		
		Yes	No	Yes	No	Yes	No	Yes	No	
<b>Progress in implementing the commitment</b>	<p>Is the commitment:</p> <p>A. <b>fulfilled</b></p> <p>B. <b>partially fulfilled</b></p> <p>C. <b>not fulfilled or dropped?</b></p> <p><u>When rating progress, consider the following guiding questions:</u></p> <ol style="list-style-type: none"> <li>1. Is the commitment new (or does it at least add to existing work in some way)? E.g. If the commitment is to continue ongoing work which falls within the core mandate of the government or organisation in question, it might be considered “ongoing”.</li> <li>2. What was the status quo (baseline) at the time the commitment was made and what was the commitment expected to change?</li> <li>3. What is the status of completion for this commitment at the time of the assessment (using the three categories above)?</li> <li>4. Please provide evidence of progress (e.g. links to published documents, draft policies, stakeholder feedback, surveys, testimonies, news articles).</li> </ol>									

<p><b>Challenges to effective implementation</b></p>	<p><b>What are the main challenges to commitment implementation (in cases where the commitment has not been fulfilled)?</b></p> <p>When discussing challenges, consider the following guiding questions:</p> <ol style="list-style-type: none"> <li>1. Has the commitment been dropped or not started? If so, why?</li> <li>2. If the commitment has been begun but not finalised, what are the key gaps in implementation?</li> <li>3. Has commitment implementation been delayed or put on hold? If so, why?</li> <li>4. Have there been any changes in political or organisational leadership or priorities since the commitment was made?</li> <li>5. For country-level commitments, does the commitment require political approval (e.g. parliamentary approval) to be taken forward?</li> <li>6. Are there resource implications for commitment implementation? Is there a budget allocated to commitment implementation?</li> </ol> <p>Please provide evidence of challenges (e.g. links to published documents, draft policies, stakeholder feedback, surveys, testimonies, news articles).</p>
<p><b>Opportunities to accelerate implementation</b></p>	<p><b>What are the main opportunities to accelerate commitment implementation (in cases where the commitment has not been fulfilled)?</b></p> <ol style="list-style-type: none"> <li>1. Has this commitment been presented in other anti-corruption initiatives and fora (e.g. OGP, UK Anti-Corruption Summit)? If so, is it presented consistently? Does it in any way add to or detract from those existing commitments?</li> <li>2. Does the commitment contribute to other national or organisational priorities? Can these links be strengthened?</li> <li>3. Does the commitment address a global priority, existing or emerging, as identified through international communiques (e.g. by the G20 or the OECD)?</li> <li>4. Are there opportunities for greater international cooperation on the issue the commitment addresses?</li> <li>5. Does the commitment respond to donor priorities (where relevant)? Are there ways the commitment could be made more relevant to such priorities?</li> </ol> <p>Please provide evidence of opportunities (e.g. links to published documents, draft policies, stakeholder feedback, surveys, testimonies, news articles).</p>
<p><b>Recommendations</b></p>	<p><b>What are the key recommendations in order to accelerate implementation of this commitment?</b></p> <p>Based on the above analysis – including of the country or organisational context, and implementation challenges and opportunities – specify:</p> <ol style="list-style-type: none"> <li>1. What concrete actions could be taken?</li> <li>2. Which actors should undertake these actions?</li> <li>3. If the commitment has been fulfilled, what steps can be recommended to take the commitment further and raise the level of ambition going forward?</li> </ol>

## Guidance on collecting and interpreting data

Before collecting data on the country or organisational context and on the level of progress in commitment implementation, the researcher should develop a brief research plan. This should contain:

- A list of the sources of (written) information for assessing the country context and progress of individual commitments (e.g. official websites, news articles, civil society reports or other third-party reports, and studies or research on thematic areas related to the commitments).
- A list of interviews to be conducted (with both representatives of authorities and non-governmental or organisational stakeholders) and the key questions to be asked. In order to ensure that the most appropriate stakeholders are selected at this point, this list should draw on the stakeholder mapping.

Once the research plan has been developed, the researcher should invite the relevant authorities to provide written evidence of progress. The researcher may also choose to send them the research plan (including the list of written sources and potential interviewees), so that they can add to the lists. This can help ensure accuracy of results.

As the authorities will already have been contacted during the commitment filtering stage, they should be prepared to provide evidence. Written evidence should be in the form of publicly available information, ideally accessible online. In cases where information is not public (e.g. internal documents), the researcher should ask the authorities to explain why. It may, for example, be a question of timing (e.g. there has not been sufficient time to publish updates on progress), in which case some flexibility on the part of the researcher may be warranted.

## Conducting interviews

Interviews can help where desk research has provided scant or questionable evidence, or where information is not (yet) publicly available. Interviews can be conducted with government or organisational officials, as well as with non-governmental officials, such as members of civil society who may have insight into the implementation of commitments. It may be that different non-governmental stakeholders are able to provide information on different commitments.

Importantly, interviews should be used not only to ascertain the level of progress on commitments, but also to gain insight into the challenges related to implementation (including the reasons for challenges and any delays), as well as the positive factors which may have enabled progress and the opportunities to accelerate progress, where relevant.

Key tips when conducting interviews and analysing interview data include:

- Be careful not to automatically treat all interview data equally. Instead, consider the nature of the data and statements provided. Government statements should not necessarily be regarded as conclusive. Likewise, statements from one civil society representative should not be taken to represent the opinion of a country's entire civil society sector.
- Be careful not give the most powerful voices more priority because they are seen to hold more power than others.
- When conducting the interview, avoid making judgements so as not to influence responses, be an active listener, pace yourself according to the time allotted for the interview, ask the respondent for permission to record the interview if you plan to do so, and inform them about the next steps and how you plan to use the data.
- Once the interview is completed, critically evaluate the data. Do not simply report what was said at face value, but interpret the data in light of the information collected from other interviews and desk-based research.

## Guidance on validating findings

Once the assessment of the country context and commitment implementation has been completed, the results should be shared with the relevant authorities, as well as a selection of other in-country stakeholders for validation. Stakeholders should be drawn from the mapping exercise performed during the research planning, and may include representatives of relevant CSOs, private-sector actors and thematic experts.

The validation process should aim to ensure that:

- the assessment of commitments and context is supported by credible and accurate evidence

- the results are accurate and fairly reflect the country or organisational context in each case
- relevant stakeholders have an opportunity to provide their perspective.

One option is to organise a stakeholder validation workshop. Ideally the workshop should be manageable in size (8-12 participants) in order to ensure balance between allowing a range of perspectives and ensuring that it is feasible to incorporate input. Stakeholder validation workshops should last from half a day to one day, depending on the number of commitments monitored. They should include a short presentation of the assessment findings (including the country or organisational context) and allow ample time to discuss these and suggest changes. Proposed changes must be supported by concrete evidence in order to be considered.

To ensure transparency, all comments provided through the validation process will be made publicly available alongside the assessment results.

Once the findings have been refined based on the validation process, the Transparency International Secretariat will conduct a final quality and consistency check and share the results with the advisory group. This ensures that the methodology has been followed correctly in each case and that the results are interpreted in the same way across countries and organisations (e.g. that the levels of progress in commitment implementation are determined in the same way).

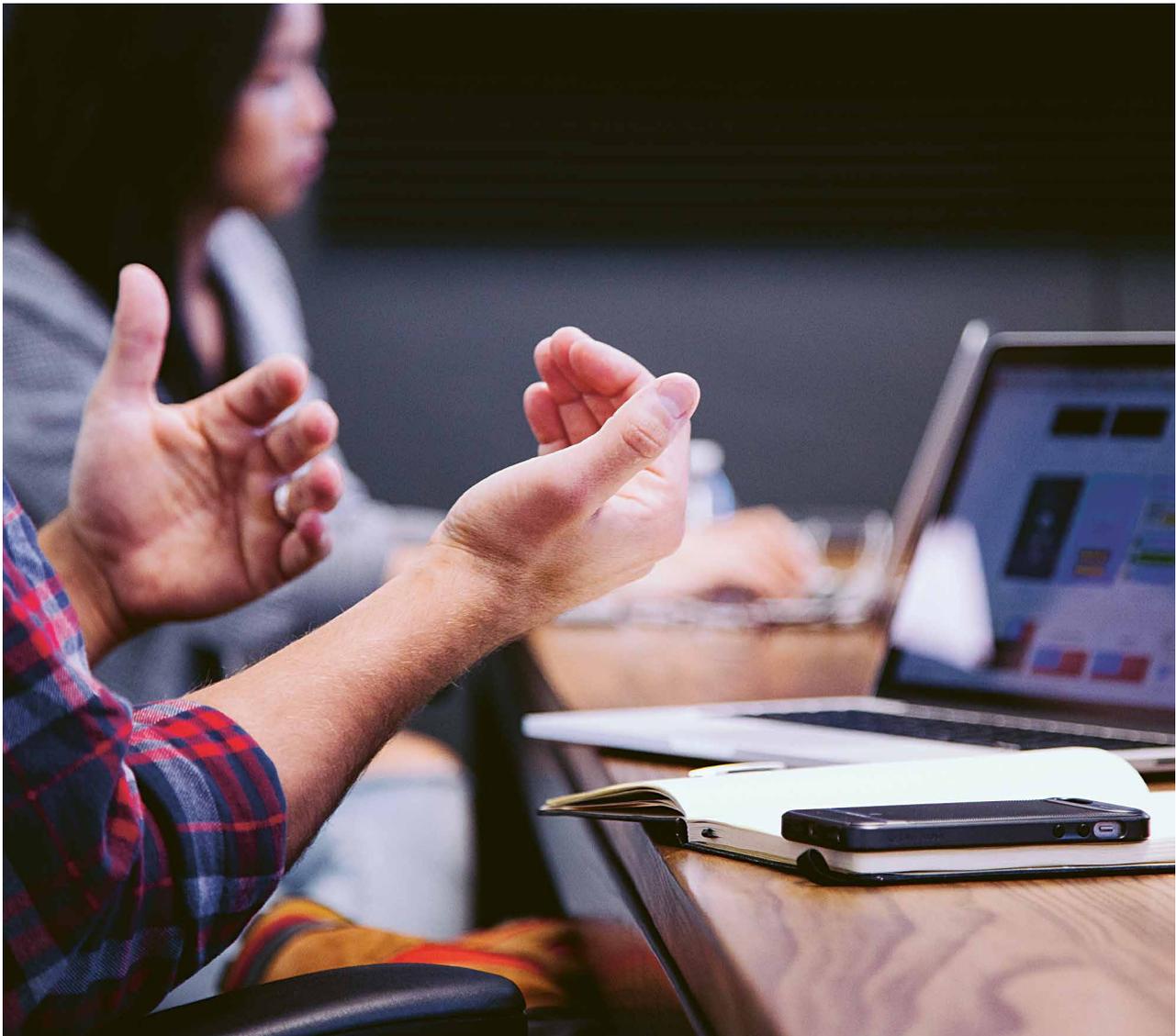


Photo by Headway on Unsplash

# Annex:

## Summary of 2018 IACC commitments

The initial mapping of commitments from the 2018 IACC High-Level Segment identified **318 commitments** by countries and organisations, covering **six thematic areas**.

### 1. Thematic areas

An initial review of commitments as they appear in national and organisational statements identified six thematic areas.

THEMATIC AREA	
Theme 1.	Legislative and Institutional Framework
Theme 2.	Public Integrity
Theme 3.	Fiscal Integrity
Theme 4.	Business Integrity
Theme 5.	Security and Law Enforcement
Theme 6.	International Cooperation and Support

## 2. Overview of national-level mapping

The initial mapping of national-level commitments identified **208 commitments** across **19 countries**.

COUNTRY	Number of commitments
Afghanistan	13
Argentina	3
Australia	10
Burkina Faso	10
Denmark	19
Finland	14
France	9
Georgia	9
Ghana	1
Indonesia	16
Ireland	9
Kenya	7
Norway	19
South Korea	14
Sweden	17
Tunisia	10
Ukraine	4
United Kingdom	10
United States	14

### 3. Overview of organisational-level mapping

The initial mapping of organisational-level commitments identified 110 commitments across 10 organisations.

ORGANISATION	Number of commitments
Asian Development Bank (ADB)	12
Asian Infrastructure Investment Bank (AIIB)	4
European Bank for Reconstruction and Development (EBRD)	4
Open Government Partnership (OGP)	13
Organisation for Economic Cooperation and Development (OECD)	19
Organisation for Security and Cooperation in Europe (OSCE)	8
UN Development Programme (UNDP) and UN Office on Drugs and Crime (UNODC)	16
World Bank Group (WBG)	29
International Monetary Fund (IMF)	6
European Investment Bank (EIB)	5





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