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**Rhetoric and Reality in Bangladesh: Elite Stakeholder Perceptions of the
Implementation of Tourism Policy**

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ABSTRACT

National tourism policy in Bangladesh is a relatively new development and this research is the first to focus on the implementation of tourism policy in Bangladesh. Taking a social constructivist perspective, interviews were carried out with thirteen elite stakeholders, from the public and private sectors, who are associated with the creation and implementation of tourism policy in Bangladesh. The data was analysed qualitatively using a content analysis approach to examine perceptions of the policy implementation process, and its success. In the case of Bangladesh, it is the persistence of hierarchical governance structures that appears to be hindering the effective implementation of tourism policy. This can be seen in the selection of priority areas by the government, the preferred policy instruments, and in the ways in which the private sector is being incentivised to support national tourism development.

KEYWORDS

Bangladesh; tourism policy; implementation; elite interviews; social constructivism

Introduction

Although the classification of a country as ‘developing’ is contested (Telfer & Sharpley, 2016), Jenkins (2015) has shown how research on tourism outside of the core tourist-generating countries demonstrates that the relationship between tourism and development is worthy of critical investigation. For developing countries, effective policy for the tourism industry can facilitate economic growth (Asian Development Bank, 2016). However, policy-making is complex, particularly so in contexts where there is participation by the public sector, the private sector, and civil society. Policy success will depend on the nature of the participation and the effectiveness of the collaboration between these groups in implementing policy decisions (Andriotis, Styliadis & Weidenfeld, 2018; Bramwell & Lane, 2000; Krutwaisyo & Bramwell, 2010). In ideal policy-making frameworks, there will also be mechanisms for monitoring and evaluating the appropriateness of the decisions taken and the effectiveness of their implementation (Airey & Ruhanen, 2014; Edgell & Swanson, 2018).

Jenkins identifies a set of ‘critical issues’ for developing countries, which must be addressed for the successful development of a tourism industry, of which, two are of clear relevance to this study: ‘To establish a process to facilitate the policy formulation, planning and monitoring

of the tourism sector [and the] development of a Public-Private Partnership as part of the enabling environment.’ (2015, p. 154). However, it can be challenging to develop tourism structures effectively in developing countries due to the involvement of a multitude of domestic and international stakeholders (Adiyia et al., 2016; Yanes et al., 2019), including powerful external tour operators on whom developing countries can become dependent on for their tourism growth (Kokkranikal, Cronje & Butler, 2011; Schmitz & Tsobogu, 2016). Tosun and Timothy (2001) explain that many developing countries struggle to bring these multiple stakeholders in to the policy process, because of the implication of this for the distribution of power in countries still dominated by elites, an issue affecting many destinations suffering from the legacy of de-colonisation, such as Bangladesh (Manyara, Jones & Botterill, 2006; Slocum & Backman, 2011). Burns (2004) suggested that a ‘third way’ was possible in tourism policy and planning, where the private sector could act entrepreneurially within frameworks set by the public sector, although it is important to observe that ‘third way’ politics was a mostly European and Atlantacist phenomenon and is yet to take root in developing countries, where policy development is still heavily influenced by the ideologies of the governments and agencies involved (Bhandari, 2019).

Bangladesh is a country in South Asia with an area of 143,998 sq. km (55,598 sq. miles). The country shares borders with India and Myanmar. Bangladesh is one of the most densely-populated countries in the world, with a population of over 162 million (BBC, 2019). The country has been on a journey towards democracy, but has suffered political turmoil for decades (Lewis, 2011). Bangladesh is a parliamentary, democratic republic and has experienced political stability recently that has supported its socio-economic development. It has witnessed a sharp growth in its GDP, boosted by foreign direct investment; in the financial years of 2017-2018 and 2018-2019, the GDP growth was 7.28% and 7.86% respectively, and the country is classified as a low-middle-income country (World Bank, 2019a). The economy of Bangladesh still mainly relies on the garments industry and remittances. For example, in 2018-19, Bangladesh received 16419.63 million US\$ as remittances (Bangladesh Bank, 2019).

[insert Figure 1 about here]

Figure 1. Map of Bangladesh (source: Geology.com 2019).

Previous research on tourism in Bangladesh has concentrated on poverty alleviation, environmental issues and climate change, linked to the country's unique vulnerabilities to flooding and other natural disasters (Hossain, Chowdhury & Ahmed, 2012; Islam & Carlsen, 2012; Wu et al., 2017). Despite its vulnerability, Bangladesh has a number of natural features that make it an attractive tourism destination. For example, Chittagong, in the southeast of the country, has 120km of coastline, the longest sea beach in the world and is the most visited tourist attraction in the country. The Sundarbans is the world's largest mangrove forest, situated in a delta of the Bay of Bengal; it is home to over 400 Bengal Tigers (Visit Bangladesh, 2019). However, to date, the tourism sector remains relatively underdeveloped. Travel and tourism accounts for 4.3% of Gross Domestic Product and 3.8% of employment in Bangladesh (World Travel and Tourism Council, 2018b, p. 1). International tourist arrivals to Bangladesh have dropped from a recent peak in 2008 of 467,000 to 125,000 in 2014 (the most recent available data) (World Bank, 2019b), as the country has struggled to portray a positive destination image following a series of natural disasters. Neighbouring, and competing, tourist destinations such as India, Myanmar and Nepal have seen their tourist arrivals increase in the same period (World Bank, 2019b). However, one of the challenges for analysing tourism development in Bangladesh is the lack of reliable data on tourism, and the relatively infrequency with which it is collected and published. Although there have been media reports (Financial Express, 2019) of a recent increase in international tourism arrivals, as high as 200,000 in 2018, this data was released Bangladesh Police, and the methodology through which it was collected is not in the public domain.

Bangladesh has a solid base of domestic tourists with disposable income and considerable time to spend for leisure that have prompted recent developments in tourism (Honeck & Akhtar, 2014), and the Government has stated its commitment to developing it as a key national industry. This research aims to answer the question of the extent to which tourism policy in Bangladesh is being effectively implemented, and how. Bangladesh possesses the natural resources, human capital and economic potential to develop a hugely successful international tourism industry (Hassan & Burns, 2014). However, it has only had nationally developed tourism policy in place since 1992, with previous master plans being developed by the United Nations World Tourism Organisation, meaning that the creation and implementation of tourism policy in Bangladesh is a relatively new phenomenon (Hassan & Burns, 2014), worthy of investigation, especially as the government now places tourism high on its agenda for meeting broader sustainable development objectives (Hassan & Kokkranikal, 2018). However, to date,

there has not been significant attention given to the implementation stage of the tourism policy in Bangladesh, or in other developing countries and therefore this is the focus here. An analysis of the effectiveness of tourism policy implementation is presented from the perspective of government and tourism stakeholders. Although this is not a study of the roles of elites in tourism policy-making, ‘elite interviews’ (Lilleker, 2003) were used in this research as a technique to gain an insight into the ‘black box’ of tourism policy (Dredge, 2010; Rodriguez, Williams & Hall, 2014).

Literature Review

There has been a renewed interest in the academic study of tourism policy in recent years (Airey & Ruhanen, 2014; Airey, 2015). Much of the foundational work on tourism policy-making has viewed it from the perspective of stage-based models (Hall & Jenkins, 1995; Elliot, 1997; Gunn, 1998) and this has remained the dominant logic for the analysis of tourism policy. For example, Edgell and Swanson (2018) describe the logical sequence for tourism policy-making as: clarifying goals and objectives, identifying tourism issues, carrying out qualitative and quantitative research, understanding the range of impact potentials (including society and environment), identifying who and what shape and influence tourism issues, and finally deciding and formulating the policy, with plans for implementing, monitoring and evaluating the policy decisions. Distinct from this functionalist approach however, recent research has begun to focus on the perspectives of individuals within policy-making communities, taking a more social constructivist perspective on policy-making for tourism (Dredge and Jenkins, 2012).

Tourism policy-making

A tourism policy is an example of public policy, specifically created for a country’s tourism sector. A tourism policy is ‘a stated course of action in the tourism field and provides a guiding framework for decisions about the future tourism governance, development and/or promotion of a country’ (Chaperon, 2017a: 427). In order to understand the implementation of tourism policy, it is necessary to understand the nature of the agencies involved in delivering policy objectives. Tourism policy-making is often multi-scalar in nature, involving international bodies such as the United Nations World Tourism Organisation (Becken & Clapcott, 2011), supra-national organisations such as the European Union (Estol, Camilleri, & Font, 2018), national authorities, including National Tourism Offices (NTO) (Kennell, 2017), as well as

statutory participation from local government agencies (Krutwayshe & Bramwell, 2010), and as such can be analysed at a variety of levels (Liasidou, 2017). Effective tourism policy depends on the management of this multi-level organisational involvement. At the international level, organisations mainly consider the macro-environment of a specific region or country while formulating, or assisting with the formulation of national tourism policy. At the national level, the development of tourism policy is closely related to power-relations within a state (Bowen, Zubair & Altinay, 2016) and the relative power of different state and non-state actors in the policy-making process (Liasidou, 2019). As Nyaupane and Timothy (2010) have shown, these power relationships in tourism development can span national borders and so also need to be considered in terms of politics and networks.

Tourism is rarely regarded as a priority political area in developed countries, where tourism policy is normally heavily influenced by other core policy areas (Joppe, 2018; Walmsley, 2019), although Keller (2015, p. 264) explains that, in advanced economies, tourism is a distinct area of policy with ‘established but lean governmental and administrative structures’. However, tourism policy in many cases is manifested in political party agendas as well as in governments’ political views (Chambers & Airey, 2001). Effective policy-making will identify the respective roles of government, private and third sectors in defining and developing the tourism system and its supporting structures (Alavi & Yasin, 2000). Generally, in tourism policy, effective role identification helps prevent unexpected interventions of influential stakeholders and allows agencies to work more independently (Tuhin & Majumder, 2011), but this has become more complicated in recent years as the range of actors involved in tourism policy-making has dramatically increased.

Institutional arrangements

Institutional arrangements (Dredge & Jamal, 2015) for tourism governance have been transformed by the global shift towards a neoliberal economy (Harvey 2007, Amore & Hall 2017), a shift which is often described as the ‘shift from government to governance’ (Bramwell & Lane, 2011, p. 411) in an attempt to describe the situation where the state takes a less directing, and more enabling, role in some matters of public policy. This produces a situation where the Government, and the associated process of governance, becomes less hierarchical in nature. In tourism, this has been seen in the proliferation of public-private-partnerships for

tourism (Bahaire & Eilliot-White, 1999; Chaperon, 2017b). Paddison and Walmsley (2018) critique the effectiveness of these new governance arrangements and argue that the increased role of the private sector accompanied by a range of new stakeholders, has weakened accountability, leading to a democratic deficit in decision making for tourism. This complexity was also observed by Stevenson, Airey and Miller (2008) who saw the increasing complexity of institutional arrangements as leading to problems in decision making and in clarifying the aims of tourism policy.

These complexities are most often seen in collaboration and partnership-working in tourism policy-making and implementation. Dredge (2006, p. 269) argues that ‘networks spanning public and private sectors are increasingly important in shaping tourism planning and development’. Selin (1999, p. 260) reminds us that ‘partnerships and collaboration have come of age in the tourism field’ which provides a basis for understanding the increasing recognition that stakeholder management should take a higher priority in the development of tourist destinations through policy. With specific reference to the stages of strategic tourism planning processes, Gunn (2002) emphasised the need for establishing terms of reference, taking a holistic approach, and consulting stakeholders. Networked forms of governance in tourism (Hall, 2011) with high levels of collaboration and partnership are becoming increasingly the norm in terms of the creation of tourism policies in developed, neoliberal economies, with some obvious exceptions such as in China (Marafa, Qi & Chan, 2019). This research examines tourism policy-making and implementation in a destination that has not frequently been considered within standard models of tourism policy making, and one of the aims of the research was to consider these processes in a developing country context, where the shift from government to governance (Bramwell & Lane, 2011) may not yet be realised. In many developing country contexts, the influence of international institutions such as the International Monetary Fund and the World Bank, can often play a decisive role in stimulating this change in approach, through the imposition of development ideologies that emphasise the role of the private sector and civil society in promoting growth (Bhandari, 2019).

However, as Amore and Hall (2017) explain, following the global financial crisis, funding for the public sector in many developing countries has significantly reduced, with implications for the support and resourcing of tourism policy, including through the public sector’s ability and interest to engage in partnership working. Butler (2009), argues that countries which are still

at what is often called the ‘Take Off’ stage of tourism should focus on effective and sustainable tourism policy implementation to create the ground for service-oriented tourism rather than going for profitability and equitable distribution of benefits between partners from the very beginning. In developing countries especially, where there may be limited opportunities to develop other industries due to constraints on investment and expertise, governments often formulate policy for tourism as a way of stimulating economic development (Almeida-Garcia, 2018; Kang, Kim & Nicholls, 2014). As Jenkins (2015, p. 149) states, ‘there can be little doubt that developing countries invest in and encourage tourism development because of its economic impact’.

Instruments and implementation

In a discussion on policy instruments and actions, Dredge and Jenkins (2007, p.181) note that ‘policy instruments are best understood as the tools and approaches used by governments to achieve outcomes and might be broadly classified according to the types of resources they use’. Clearly, the choice of policy instruments depends on the nature of policy problems, and the level of government involvement in addressing them. But, whatever the circumstances, such instruments have to be seen as mechanisms of resource deployment. Hood (1986) offers a typology of policy instruments, divided them into four groups: information instruments, treasury instruments, authority instruments, and organisation instruments. Velasco (2016a, 2016b), analysing the implementation of Spanish tourism policy, adapted Hood’s (1986) model in a categorisation of instruments involved in the implementation of tourism policy. The first of these are *organisational instruments*; the creation of specific organisations responsible for the implementation of tourism policy, and the relationships between these organisations and other organisations with interests in the outcomes of tourism policy. Secondly, *compulsory regulations and norms* imply formal obligations related to tourism in terms of governments, businesses and other actors. Thirdly, Velasco (2016a, 2016b) identifies *incentive and promotion instruments*, which seek to encourage private sector actors to align their activity with the goals of a tourism policy, such as tax incentives and grants. The fourth category of instruments are the *improving knowledge* instruments; the creation of new knowledge in tourism, the collection of new data, research and development programmes, or knowledge transfer between higher education and industry. The final instruments are *communication tools* such as international campaigns for destinations, or the promotion of careers in the tourism industry.

Dredge and Jenkins (2007), identified four factors that influence the choice of policy instruments: the disposition of the state, knowledge of instruments available, current events, and knowledge of the consequences. Krutwatscho and Bramwell (2010, p. 686) found that, in the example of Thailand, the state had the driving role in terms of the implementation of tourism policy, with other non-state actors being engaged in ‘conflict, negotiation and bargaining’ about the impacts of the implementation being pursued by government agencies. In the case of Taiwan, Liu, Tzeng and Lee (2012) also explained that the government plays a leading role in the implementation of tourism policy, which suggests that the ‘shift from government to governance’ may not necessarily be universal throughout the policy-making process, with the state still taking a lead role in the implementation stage.

Tourism policy-making is complex, sometimes disputed, but whatever the prevailing political and economic circumstances, it should be directly intertwined with implementation: the process through which policy ideas and plans are translated into practice (Telfer & Sharpley, 2016). The implementation of tourism policy depends on the effectiveness of local, regional, and national officials in working in partnership with the private sector and other stakeholders including the host populations and environmental and third sector groups (Dodd & Butler, 2009; Albrecht, 2017). Tourism policy implementation can be challenging in many cases (Lai, Li & Feng, 2006), but research focused on the implementation of tourism policy is relatively rare (Albrecht, 2017).

Dela Santa (2018) has shown that the standard functionalist approach to understanding tourism policy that sees implementation as a straightforward final-stage in a cycle, does not recognise the political nature of the implementation phase, in which it is necessary to both build awareness and support for the instruments that are being used and to build coalitions to increase the likelihood of successful implementation. Complications can arise because the public sector is motivated by economic, social, and environmental concerns and provides the political will and practical framework for the tourism sector, which is motivated to generate profit by understanding tourist needs and wants. In developing countries, tourism policy implementation is seen as a challenge because of the perceived wider gap between plan and action (Kilicbeyli, 2011). Three approaches to policy implementation as suggested by Hall (2009) are useful. Out of these approaches, the ‘top down’ and ‘bottom up’ approaches are found as beneficial for

tourism policy implementation in developing countries (Andriotis, 2018). The ‘top down’ approach follows hierarchical sequences from the top level policy planners to local level, while the ‘bottom up’ approach refers to implementation that originates at the local level (Zhang, Chong & Jenkins, 2002; Wang & Ap, 2013). The third approach, ‘hybrid and interactional’, has greater explanatory power in developed countries, where the shift from government to governance (Bramwell & Lane, 2011) is more established.

Dodd’s (2007) study of the implementation of sustainable tourism policies in Mallorca found that there were six main barriers to successful tourism policy implementation: an excessive focus on economic gains at the expense of other concerns; a lack of sufficient planning; lack of stakeholder involvement; lack of integration between national and regional policies; a lack of accountability of politicians involved in the process and; political clashes that undermined the practical implementation of the policies. Pechlaner and Saurwein (2002) discuss what they describe as the ‘sloppy implementation’ of tourism policies and identified another set of factors influencing the successful implementation of tourism policy in their study of the South Tyrol, Austria: a lack of a properly strategic approach to the creation and implementation of policy; the difficulties involved in encouraging local DMOs to be aligned with the policies of the NTO in their activities; a lack of clear responsibilities for implementation and; poor communication of the intended impacts of implementation in the destination. There is a relative lack of research on the implementation of tourism policies (Maxim, 2018) and the two examples above show that a clear conceptual approach to understanding implementation is yet to emerge. Clearly, the implementation of tourism policies, and the criteria upon which their success is to be judged, will vary greatly between destinations, depending on their stage of development, local needs and the availability of human and other resources. Through the application of a social constructivist approach, this research aims to show how the challenges of implementation can be understood from the perspectives of those involved in it, using a case study of Bangladesh.

Case study: Tourism policy implementation in Bangladesh

There are some challenges in studying Bangladesh’s tourism policy. The policy document is available on the website of the Ministry of Civil Aviation and Tourism (MCAT) and, but only

in Bengali (Ministry of Civil Aviation and Tourism, 2018). An English version of a policy document is available on the official website of Bangladesh Parjatan Corporation (BPC), the National Tourism Organisation (NTO), but its year of publication is unclear, citing both 2009 and 1992 as its year of publication, making it difficult to ascertain the time frame and context in which the decisions were made (BPC, 2018). When developing countries adopt multilingual websites in the interests of meeting the needs of diverse audiences, this ambiguity creates a ground for conflict between international and local experts and adds to the complexity of tourism policy analysis (Hassan & Kokkranikal, 2018). Furthermore, BPC and Bangladesh Tourism Board (BTB) as the NTO both fail to provide up to date statistical data on their websites or in their reports (Bangladesh Tourism Board, 2018).

Considering the relatively poor accessibility to statistical data on tourism in Bangladesh, and the ambiguities around the tourism policy documentation, the social constructivist approach taken for this research, and the priority given to the perspectives of Bangladesh's elite tourism stakeholders, is further justified.

Before 1992, Bangladesh had no tourism policy but rather a strategic 'Master Plan' for tourism development which had been prepared by the United Nations Development Programme and World Tourism Organisation. The first tourism policy was created by the government in 1992. Following an increase in international arrivals, the government updated the policy in 2009. The MCAT is responsible for formulating the policy and the BPC and the BTB are the government agencies responsible for implementing it (Hassan & Burns, 2014). The Tourism Policy of Bangladesh 2009 has thirty-one broad objectives and goals for the industry. In 2010, a further version of the policy was published to more clearly set out the goals and priority areas for the industry (Siddique, 2010), summarised in Figure 2

[insert Figure 2 about here]

Figure 2. The goals and priority areas of Bangladesh tourism policy (source: Siddique, 2010).

Methods

This research took an interpretive (Lincoln, 1995; Veal, 2007; Saunders, Lewis & Thornhill, 2009) approach in line with the social constructivist turn in tourism policy research proposed

by Dredge and Jenkins (2012), in order to analyse stakeholder perspectives on the implementation of tourism policy in Bangladesh. As Bangladesh is a young country, with a relatively short history of developing tourism policies, this interpretive approach was deemed appropriate to investigate an emergent social practice where the ‘rules of the game’ (Joppe, 1996) are not yet established.

The term ‘social constructivism’ was coined in Berger and Luckmann’s text, ‘The Social Construction of Reality’ (1967). The social constructivist position entails a critical stance towards ‘taken-for-granted knowledge’ (Tribe, 2008, p. 246) and, as an epistemology it has been used widely in the social sciences to challenge essentialist thinking in a range of contexts (Pernecky, 2012; Guachella, 2018). Hollinshead (2006) explains the *constructivist turn* that has taken place in the social sciences more generally in recent decades and that this reflects a rejection of the ‘ubiquitous normalizations of objectivity’ that have dominated research under a positivist paradigm, along with a belief that the meanings of social processes are not ‘latent and discoverable, but constructed’ by the participants within a social setting. The construction of these meanings is based on a socio-technical process, in which human and non-human actors interact, bringing together both the individual and shared perspectives of people and non-human resources which can include such entities as institutions, processes, information technology, money and cultural artefacts (Steins & Edwards, 1999). Dredge and Jenkins (2012) explain how the application of this social constructivist perspective can generate new knowledge about policy-making, as policy decisions are often based on the ‘subjective and bounded rationalities’ (Dredge & Jenkins, 2012, p. 231) of those involved in the policy process.

Although critics of constructivist approaches bemoan the multiplicity of viewpoints generated from its associated research programs, and highlight the need for such research to impact on the lived experience of people in a material sense (Bianchi, 2009; Botterill, 2014), this approach provides a useful standpoint from which to critique the dominant functionalist models of tourism policy-making. In this research, applying a social constructivist perspective allowed for the capturing of participant’s views on tourism policy in Bangladesh, in a way that avoided the normalisation of their views that could have been generated through a more positivist approach. As explained below, a model of the policy process was applied to guide the design of the interviews used in this research, but questions and discussions were suitably open-ended to allow the meanings perceived by participants to emerge.

In order to collect data from appropriate participants, this research followed a non-probability sampling method (Bryman & Bell, 2007) described as ‘purposeful sampling’ (Cresswell & Plano Clark, 2007, p. 112), to develop a sample of elite interviews, with high-level participants in Bangladesh’s tourism policy processes. Although the use of elite interviews has not been widespread in tourism research, it is a commonly used technique in politics and policy research, because it has the potential to increase the quantity and quality of data available to researchers in fields where the social phenomenon under study involves individuals who ‘wield power in different societal, legal, financial, political and organisational settings’ (Darbi & Hall, 2014, p. 833). There is no generally accepted definition of what constitutes an elite, or how an individual member of an elite can be identified, but Harvey (2011) shows that these individuals will be people who are part of important social networks and hold positions of power and strategic influence in relation to specific social, political or business processes. Given the frequently referred to ‘black box’ (Dredge, 2010; Rodriguez, Williams & Hall, 2014) of tourism policy processes, interviews with these types of individuals offer opportunities for fresh insights into tourism policy (Lilleker, 2003). In this particular context, interviews were carried out with the members of Bangladesh’s tourism policy community, who tend to be drawn from the political elites. This has been a conventional practice in Bangladesh that not only almost all of the country’s policy communities, but both the ruling party and government are dominated by elite groups with their socio-political influence and financial capacities. Elite interviews were chosen for this research because of their value in examining the high-level structures of tourism policy implementation, and to shed light on a process that has not previously been the focus of research into tourism in Bangladesh. However, other groups also have legitimate roles to play in the formulation and implementation of tourism policy in the country, which are realized to a greater or lesser extent. For example, international agencies such as the UNDP and UNWTO have previously played a role in the creation of tourism policy in Bangladesh (Hassan & Burns, 2014). Community groups and Non-Governmental Organisations (NGO) would also frequently be involved in the tourism policy process in other destinations, but there is no evidence of this taking place in the case of Bangladesh. For the purposes of this research, which has a focus on the public-private relationship, these other stakeholders were not included in the sample, although this is a limitation of the present study.

Using elite interviews does introduce some limitations into this research. One of the most frequently remarked upon problematic implications of this style of interview is the issue of power-distance between the interviewer and interviewee (Liu, 2018). The researchers were

conscious of their positionality in the process of using elite interviews. Contact was made with respondents over the telephone to arrange a suitable time and venue for the interview that allowed the researchers to control some elements of the setting. The researchers ensured not to disclose any personal information that could allow respondents to emphasise their relative elite position.

A shortlist of potential interviewees was constructed using secondary reports about the development of the most recent Bangladesh tourism policy and snowballing was used to access contacts who were often difficult to obtain as an outsider, a common issue faced when conducting elite interviews (Anastasidou, 2008). A total of thirteen face to face elite interviews were conducted with two sets of interviewees. The first set of respondents were senior professionals working in private tourism enterprises, who had played a consultative role in the national tourism policy-making process, and all of whom had expert knowledge of tourism policy in Bangladesh. These respondents also worked on national-level industry bodies operating in Bangladeshi tourism. The second set of respondents was comprised of officials involved in tourism policy-making, including representatives from the Prime Minister's Office and the government departments responsible for tourism policy. The full list of stakeholders is in Table 1, below. The final sample size was determined when saturation point was reached. Saturation point has been classified 'as the point at which the data collection process no longer offers any new or relevant data' (Dworkin, 2012, p. 1320).

Primary data was collected using semi-structured questions. This allowed the discussion to be led by respondents to a certain extent and which revealed information not predicted by the interviewer. The aim of this interview technique was to build a holistic assessment of people's views by giving them the space and time to make overall sense of their experiences related to tourism policy in Bangladesh, and also to gain an insight into the interviewees' individual perspectives (Bickman & Rog, 2009). Harvey (2011) explains that open-ended questions are a suitable device for elite interviews as respondents with expert knowledge do not like to be constrained by closed questions that limit their agency. The interviews were designed thematically (Kvale, 2008), with questions based on a model of the tourism policy-making process adapted from Airey and Chong (2011), which splits the policy process into inputs, policy processes and policy outputs and outcomes. The questions asked for respondents' views

on each stage of the policy-making process, with a strong focus on instruments and implementation, and were designed to allow the interviews to flow in a natural, conversational style, which gave respondents the opportunity to respond in depth. More closed questions and structured interview formats are not recommended for elite interviews, because respondents are considered to prefer to expand on their responses, and not to be tied to a prescriptive perspective from a researcher (Harvey, 2010). The interviews were carried out in Bengali. Initially the interviews were transcribed in Bengali, and then translated to English. For interpretation and analysis, the first set of respondents were labelled as *An*, and the second set as *Bn*. The first set of respondents were representatives of private tourism enterprises and the second set of respondents, 'B', were representatives of the public sector, involved in policy-making for tourism.

The interview data was analysed using a thematic content analysis approach, linked to the literature reviewed in section 2. Content analysis is a method of qualitative data analysis (QDA) that involves 'careful, detailed, systematic examination and interpretation of a particular body of material to identify patterns, themes, biases and meanings' (Berg 2007, p. 304). This method of QDA contains elements of a more quantitative approach as it typically involves a systematic unitizing of textual data. However, Berg (2007, p. 308) points out that to think of content analysis as a quantitative procedure is to concentrate too heavily on the process of data manipulation and to under-represent the process of analysis of the data which 'involves developing ideas about the information found in the various categories, patterns that are emerging, and meanings that seemed to be conveyed'. Approaching content analysis in this way brings it in line with interpretive QDA methods and this was the approach taken to content analysis in this research, which sits within a social constructivist paradigm in terms of its approach to understanding tourism policy (Dredge & Jenkins, 2012). Part of this process involves comparisons with previously published studies and relevant aspects of this have been summarised in section 5.

[insert Table 1 about here]

Table 1. Interview respondents.

Findings and analysis

In this section, the findings from the interviews are presented, and analysed with reference to the relevant academic literature. This is summarised under two headings, which relate to the two emergent themes: hierarchical governance structures for tourism, and tourism policy instruments and implementation.

Hierarchical governance structures for tourism

An important finding of this research is that, from the perspectives of the elite respondents, the government and the NTO remain overwhelmingly in control of the policy process, including its implementation. Establishing this was an important first step of the analysis, as it helped to create clarity in terms of the roles of state and non-state actors (Liasidou, 2019) in the creation and implementation of Bangladesh's tourism policy, which are closely related to more general power-relations within the state (Bhandari, 2019; Bowen, Zubair & Altinay, 2016).

Effective tourism policy-making should involve the clear identification of different stakeholder roles and responsibilities (Alavi & Yasin, 2000), but in the case of Bangladesh, this remained an area of confusion and frustration for the tourism industry representatives. This frustration was expressed by some with a certain cynicism as to whether a tourism policy was even required for Bangladesh, given, as they viewed it, its uncongenial and unsupportive nature. This is despite the professed vision of the Bangladesh tourism policy which aims to increase public sector support for, and collaboration with, the private sector for the future development of the industry. This cynicism was explained by some of the private sector respondents as being because, from their perspective, the tourism industry had been developing steadily and successfully without a substantial tourism policy. It is not possible to evaluate the validity of this statement without an accepted set of benchmarks, yet seen through the social constructivist lens of this research, it demonstrates that the private sector do not perceive the need for a tourism policy with the same urgency as the public sector, helping to explain some of the difficulties in the two groups working together effectively.

Focusing on collaboration and partnership between the public and private sectors in the implementation of tourism policy, a situation that has become the norm in developed countries (Amore & Hall, 2017; Chaperon, 2017b), opinions from industry were mixed. Private sector representatives from the BTA, TOAB and BIHA (A1, A3, A4 and A5) were very positive about the intentions for public-private sector collaboration: ‘The national tourism policy that Bangladesh currently has at least offers some scope to collaborate and make partnerships with expatriate investors that results in building so many good quality hotels and restaurants’ (A5). One of the TOAB representatives similarly commented that ‘our tourism policy is world class...Even I am working in joint partnership with foreign tour operators to bring international tourists to Bangladesh’. On the contrary, the representative of ATAB (A2) expressed the view that the collaboration and partnership aspects of the national tourism policy of Bangladesh were simply not happening.

The private sector representatives expressed a strong desire to be more involved in national tourism policy-making, and appreciated the intent of the government in the policy document, but felt that this collaboration had not yet been realised. Respondents from the BTA, ATAB and the TOAB argued that tourism policy would be improved by incorporating more of the suggestions made by tourism businesses, relevant interest groups and other non-governmental organisations. In a similar vein, the university representative argued that ‘private organisations should share their knowledge and experience with the government, to be reflected in the national tourism policy’ (A7). The ATAB representative criticised the government mind-set and complained that ‘in most cases we are not welcomed at all by the relevant public sector officials to reflect and facilitate our individual opinions’. Compounding this view, a public-sector respondent (B1) argued: ‘we have to overlook interests and opinions of pressure groups in many situations because we have to look after the national interest of our country first’. The university respondent (A6) explained that tourism policy-making is mostly undertaken by government agencies, with some donor and international agencies also contributing where there is project funding involved. The majority of the public sector respondents highlighted the importance of these agencies in Bangladesh’s tourism policy-making. Respondent B3 argued that ‘I personally believe that the role of UNWTO and UNESCO are important and their involvement in the national tourism policy-making would really help’.

The divergent views on the contributions made by international bodies to the development of Bangladesh's tourism policy contradicts the assertions made by some policy researchers that a multi-level-governance approach can be most effective (Becken & Clapcott, 2017; Estol, Camilleri, & Font, 2018). More significantly, from the perspective of the private sector respondents, it seems that there is currently insufficient collaboration taking place between the public and private sectors in tourism policy. The lack of engagement of tourism businesses and NGOs suggests that, for Bangladesh, the 'shift from government to governance' (Bramwell & Lane, 2011, p. 411) is at best incomplete in Bangladesh, in the area of tourism.

An important implication of this is that Bangladesh's tourism policy does not focus on areas of importance to the domestic tourism industry. Some of the private sector respondents (A1, A2, A4 and A5) blamed public sector policy-makers for failing to identify appropriate priority areas and plan accordingly. For example, the BIHA representative discussed the potential of developing tourism products based on Bangladeshi cuisine, stating that 'Bangladeshi cuisine is getting popularity in Europe as well as all other parts of the world', but that this was not taken seriously by tourism policy makers as a priority area. Respondents A6 and A7 strongly criticised the 'top down' bureaucratic nature of the government and the lack of attention it has given to the distribution of the benefits of tourism.

Public sector respondents were, unsurprisingly, much more positive about their ability to effectively plan for tourism: 'we are responsible for the national tourism planning and obviously we have to have adequate knowledge to complete this job successfully. We have to follow every stage required for this tourism policy-making' (B3), and as the NTO, 'we have scope to contribute for the promotion of the tourism industry of Bangladesh' (B6). In response to whether the public sector should listen and respond to suggestions from the industry, such as concerning sustainability and security, a fairly lukewarm answer was given by the representative of the Office for the Prime Minister who commented: 'Our office has instructed the government agencies involved in the national tourism policy-making to consider these concerns'. Similarly, the representative of the Ministry of Planning (B3) explained that they simply have to respond to the government's directions and ensure that all plans are feasible and achievable. These responses suggest that governance and decision making for tourism in Bangladesh is perceived as being clearly 'top down' and hierarchical in nature (Hall, 2011),

meaning that it is aligned with tourism policy making in other developing countries, such as China (Marafa, Qi & Chan, 2019).

Tourism policy instruments and implementation

When discussing the specific instruments that were being used to implement tourism policy in Bangladesh, public sector respondents expressed a strong preference for the instruments described by Velasco (2016a, 2016b) as *incentive and promotion instruments*. Regarding incentives, the representative from the Ministry of Planning (B2) stressed the need for the availability of public funding at the same time as the policy decisions are being made, to ensure that there are the necessary financial incentives available to attract the involvement of businesses in its implementation. Some of the public sector respondents (B4, B5 and B6) implied that there was no expectation for the private sector to make such significant financial investments as was needed to support the development of tourism in some of the more remote islands like Saint Martins, Nijhum Dip, Moheskhal, and others, all of which would require input that is beyond the capacity of the private sector. On the contrary, the MoCAT representative believed that much of the financial investment needed to develop tourism would come from businesses themselves: ‘if you follow the tourism policy of 2009, they have clearly stated that the government would welcome private sector investments as the instrument of tourism policy-making’. This contrasts with the traditional view of ‘top down’ governance and associated policy instruments (Hood, 1986; Dredge & Jenkins, 2007) which sees a high level of government involvement and investment in the implementation of the priority policy decisions.

The view that the tourism industry itself should bear the financial burdens of implementation was not seen as negative by industry respondents, although they were keen to stress the importance of a supportive regulatory environment to do this; *regulations and norms* were seen as related to *financial incentives* by respondents (Velasco, 2016a, 2016b). They argued that private investors and entrepreneurs should be given much more freedom to develop their own projects and to make the most of entrepreneurial opportunities in tourism, to help the government to implement its tourism policies. Representatives of BTA, ATAB and TOAB indicated that making funding available for capital investment and creating business friendly policies are the two main tourism policy instruments that would have a positive impact on their

ability to implement policy aims in the coming years: ‘we want policy instruments that will help expanding our business’ (A5).

There was more limited, support for other kinds of instruments, with *knowledge instruments* (Velasco 2016a, 2016b) often mentioned, with the intention to support tourism related businesses to grow. One of the university representatives suggested that ‘private sector tourism should be given policy supports and access to capital loans so we can facilitate the development of tourism activities’. They recognised the importance of applying marketing techniques like segmentation and targeting, researching, and benchmarking in tourism policy instruments. Other instruments that were recommended were described as training and educations, improved development of information and communication channels. All of the respondents mentioned that the present tourism policy instruments in Bangladesh are characterised by government authority and control (Hood, 1986), reinforcing the idea that the hierarchical nature of governance in Bangladesh influenced not only policy-making, but also the implementation of tourism policy.

Both sets of respondents suggested the creation of new *organisational instruments* (Velasco 2016a, 2016b). Public sector respondents (B4, B5 and B6) proposed the idea of forming a ‘National Tourism Committee’, with the Prime Minister of Bangladesh as the chair. This committee would coordinate all governmental ministries and agencies. This was clearly an idea that had been previously discussed amongst public sector officials, but the respondents were not forthcoming with more details. Further, the respondent from the Office for the Prime Minister (B1) pointed out that ‘the government have plans to create a fully functional “One Stop Tourism Service” for the tourists’. Some public sector respondents suggested that new governance arrangements for tourism could be considered, although this was mostly framed in terms of the widely shared optimism that public-private-partnerships in tourism could help to stimulate new business investment (Chaperon, 2017b), rather than as an attempt to improve the quality of decision making or implementation in tourism policy.

From the private sector perspective, suggestions were also made for new *organisational instruments* (Velasco 2016a, 2016b) which would create the conditions for a more competitive tourism industry: ‘this is important to set up specialised institutions financed by the private tourism entrepreneurs to create good tourism professionals’ (A3). This respondent suggested a new institution: ‘Bangladesh Institute of Tourism and Hospitality (BITH)’. One of the

university representatives highlighted that the National Hotel and Tourism Training Institute was seeing an increase in demand as the private sector invests in training. In this sense, industry representatives saw the creation of new institutions from a more neoliberal perspective (Amore & Hall, 2017), breaking the state's monopoly in this policy area. The clear disconnect between the views of the public and private sectors in terms of the correct instruments for the implementation of tourism policy in Bangladesh help to explain the complexities and difficulties in implementing the policy.

On the issue of the implementation of the existing tourism policy in Bangladesh, all of the respondents emphasised the importance of its success, but views were divided in terms of the extent to which this had been realised. As explained by a university respondent: 'the implementation of the national tourism policy relies on capacities of the private and public sector. In case, both sectors can work together, the policy will be implemented successfully'. This illustrates the perceived importance of partnership working for implementation, a finding also reflected in the analysis of Dodds (2007) and Pechlaner and Saurwein (2002). Respondents from the private sector tended to believe that although implementation should involve the participation of tourism businesses, in reality, this is not happening, and the policy is imposed from the government in a 'top down' approach (Andriotis, 2018). On the contrary, respondents from the public sector were convinced that, if necessary, the government has the capacity to implement the national tourism policy on their own, and this is already underway: 'Look, the national tourism policy is very important document and we already have this. We are working for its full implementation in coming years'.

Previous research on the development of tourism in Bangladesh, in the context of poverty alleviation, found that a lack of government support for private sector involvement is hindering the development of the sector (Islam & Carlsen, 2012, 2016). When examining the role of tourism in supporting communities in the Sundarbans mangrove forest, Islam, Rahman, Iftekhar and Rakkibu (2013) found that improved collaboration between government and other stakeholders was a key factor in enhancing the benefits of tourism locally. Although the present research offers a different methodological approach, and examines a broader, national policy implementation context, the findings also support this view.

Summary of findings

The implementation of tourism policy in Bangladesh is highly influenced by the nature of tourism governance in the country, which is characterised by a hierarchical structure (Hall, 2011) where government leads the tourism policy-making process and makes decisions about its implementation. This hierarchical leadership is manifest in the powerful role played by the NTO in Bangladesh. Although there are rhetorical claims from government that there is private sector influence, it is generally acknowledged that in reality this is limited. Private sector respondents are dissatisfied with the uneven power relations between themselves and the public sector as they do not feel that the government is making decisions in the best interests of the industry.

Moving from the policy-making to implementation, we see a very similar picture of uneven power relations. However, there is a greater recognition by government of the need for private sector involvement, with clear encouragement for private sector investment. The private sector respondents had concerns that government had failed to provide the optimal business environment for this investment. Both sides see merit in renewing the *organisational instruments* (Velasco, 2016) for tourism, but there is disagreement over how these should be formed, with the government respondents proposing a public-sector led committee which focuses on the marketing and promotion of Bangladesh as a tourism destination and the private sector favouring a business-led agency which focuses on the tourism operating environment.

Although there are some public indications that there is increased collaboration between government, private, and third sectors, there is disagreement over the extent to which this is actually happening. The transition from a hierarchical to a more ‘hybrid’ (Hall, 2009) governance approach has not yet been realised, and the ‘shift from government to governance’ (Bramwell & Lane, 2011) seems far from complete.

Conclusion

This research applied a social constructivist perspective to answer the question of to what extent tourism policy in Bangladesh was being implemented, and how. To achieve this, elite interviews were carried out with tourism policy stakeholders. These interviews were analysed using a qualitative content analysis approach, to allow the perspectives of these elite

respondents to shape the findings. These findings were then critically compared to the existing literature on tourism policy implementation to allow conclusions to be drawn.

There are limitations inherent in applying this methodological approach to the study of tourism policy. As critics of constructivism have identified, this approach can lead to a multiplicity of perspectives on a topic emerging that simply reflect a plurality of respondent opinions, rather than help a researcher to arrive at an objective position. This research sought to minimise this by collecting data from thirteen different organisations or government departments, but by only continuing with interviews until saturation point was reached in terms of respondents' insights. In addition, using an elite interview approach (Harvey, 2011) privileges the views of one particular strata of society, who in the context of Bangladesh are concentrated within the institutions of state and large-scale firms, to the exclusion of other voices, such as community groups and NGOs, who also have a legitimate interest in the implementation of tourism policy. The focus of this research was on the relationship between the state and the private sector, but future research should consider other relationships, including those that exist outside of formalised and elite stakeholder relationships.

As a developing country, with a new tourism policy, lessons can be learnt from this Bangladesh for other countries at a similar stage of tourism development and with similar characteristics. Jenkins' (2015) identification of issues for tourism policy in developing countries highlighted the importance of having a policy process in place that was enabling for the sector, and of developing partnerships between the public and private sector to support this. In Bangladesh, the rhetoric of partnership in the policy process and policy documents, are not matched by the reality of the implementation of these policies. Research in other developing destinations has identified the complexity of stakeholder relationships (Adivia et al., 2016; Yanes et al, 2019) and the influence of powerful inbound tour operators (Kokkranikal, Cronje & Butler, 2011; Schmitz & Tsobogu 2016), as factors that can explain the difficulties in developing effective tourism policy in developing countries. However, this research has shown that it is the incompleteness of the shift from government to governance (Bramwell & Lane, 2011), and the ill-feeling that this has caused in the private sector, that is hampering the implementation of tourism policy in Bangladesh. Research in Kenya (Manyara, Jones & Botterill, 2006) and Tanzania (Slocum & Backman, 2011) has suggested that countries who have inherited very top-down intuitions of governance from their colonial past can struggle to implement tourism

policies using meaningful partnerships, and this may also be the case in Bangladesh. The findings of this research suggest that attempts to reform government and policy making across different policy areas in Bangladesh are particularly important in tourism, where complex stakeholder relationships are a common feature of development projects. Creating new forms of partnership between the public and private sector, including PPPs (Chaperon, 2017b) should be seen as a priority for tourism policy. The PPP Authority, a department within the Prime Minister's Office, lists seventy-four PPP projects currently under development, or being implemented, in Bangladesh (PPPA, 2019). However, only one of these is a tourism project, and this failed, as explained above, due to a lack of private sector engagement.

This research shows that many of the findings of the tourism policy literature, which sometimes takes a shift from government to governance for granted, should not be assumed to apply in all cases, and especially not in the diverse cases of tourism policy making in the developing world. Where government and its agencies still assume a hierarchical control over the implementation of tourism policy, and the choice of policy instruments, private sector tourism enterprises will be excluded, limiting the success of policies which attempt to influence the development of a private-sector dominated tourism industry.

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