

Anti-Corruption NGOs as Think Tanks: The Effect of Transparency International UK on the UK Bribery Act 2010

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Abstract

While anti-corruption scholars have analyzed and explained theoretically citizen-based anti-corruption approaches, studies on one of the most important aspects of a leading anti-corruption non-governmental organization (NGO) has been limited: the role of Transparency International (TI), in particular national branches of TI, as a think tank. Drawing on data from an interview with a former head of TI in the UK (TI-UK), this study will conduct a preliminary review and analysis of the effects of TI-UK in anti-corruption policymaking. The analysis shows that TI-UK was not only involved in the drafting of legislation but also had an impact on the outcomes during the legislation and initial implementation processes. This study is expected to contribute to understandings of anti-corruption policymaking processes and development of theories and practices of anti-corruption reforms.

Keywords

Anti-Corruption; Policymaking; Transparency International; UK Bribery Act 2010; Process Tracing

Introduction

Academics, policymakers, domestic and international non-governmental organizations (NGOs), and international organizations have actively engaged in fighting against corruption across the world. The anti-corruption movement has been active mainly since the 1990s. These actors regard corruption as one of the most serious problems to be tackled in the world and have proposed and tried a variety of anti-corruption reforms including top-down reforms (i.e. national governmental reforms) and bottom-up reforms (i.e. NGO advocacy and awareness-raising campaigns).

Among these actors, NGOs have arguably the biggest potential to influence the success of anti-corruption policies in the future. After witnessing many failures of top-down anti-corruption reforms, increasing number of scholars started to study about the role of bottom-up approaches, namely approaches by NGOs, to fight against corruption (see e.g. Hough 2017). However, few studies pay attention to the role of NGOs as organizations that can provide practical knowledge on anti-corruption policies. Literature on evidence-based policies suggests that NGOs can provide practical knowledge during policymaking (Head 2008).

In addition, the role of the most well-known NGO in the study of corruption, Transparency International (TI), as a think tank¹ – which can influence anti-corruption policies by providing practical knowledge – has attracted little scholarly attention from anti-corruption researchers. Except for a recent ethnographic case study on TI Portugal and anti-corruption mobilizations (Lang 2021), there is few academic papers to my knowledge which consider TI, in particular national branches of TI, in terms of its capacity as an anti-corruption think tank.

Consequently, this study endeavors to conduct a preliminary review and analysis of the effects of NGO in anti-corruption policymaking at the national level rather than in anti-corruption social movements (i.e. Integrity Idol or I Paid a Bribe.com (IPAB)). Using a case study, this study examines the role of TI in the UK (TI-UK) in the process of the legislation of the UK Bribery Act 2010, on which a variety of actors – including TI-UK – actively lobbied to the UK parliaments under international pressure (Alldridge 2012; Hogge 2015; Harrison and Ryder 2016). How effective was TI-UK's advocacy campaign in the legislation process and initial stage of implementation of the UK Bribery Act 2010?

This research note will utilize an existing framework with causal process tracing methods proposed by Betsill and Corell (2001). Although the framework was originally proposed for the research of international environmental policymaking, this framework does not have a set of

¹ In fact, TI is ranked 53rd (2020 Top Think Tanks Worldwide) and 2nd (2020 Top Transparency and Good Governance Think Tanks) in *2020 Global Go To Think Tank Index* (McGann 2020).

requirements specific to environmental policies and thus it is also applicable to the study of corruption. The framework provides a series of questions which enable researchers to trace the process from NGOs' transmission of information to NGOs' effects on policy outcome. This study examines the effects of TI-UK on the UK Bribery Act 2010 by analyzing data from parliaments and NGOs, as well as a Skype interview with the former Director of TI-UK and other secondary sources. This preliminary study shows TI-UK played a significant role as a think tank in anti-corruption policymaking by participating and joining parts of negotiation processes and which suggests the potential for anti-corruption NGOs' impact on anti-corruption policies in other countries.

Actors of Citizen-Based Anti-Corruption

Citizen-based anti-corruption movements involve three actors: anti-corruption groups composed of activists, professional groups, and NGOs. Firstly, activists are one potential actor for anti-corruption movements. As actual cases show, anti-corruption activists can initiate movements individually (Rahman 2011) or collectively (TI Ukraine 2017). The second group of actors are professional groups. This includes journalists or lawyer groups such as Citizens' Coalition for Democratic Media in South Korea (Kern and Nam 2008). Thirdly, NGOs can also be an actor to lead movements against corruption. For example, Integrity Idol's campaign in Nepal is one of the successful citizen-based anti-corruption movements run by NGOs in developing countries (Pattison 2014; Hough 2017). This is a yearly TV program launched by TI Nepal and the program aims to "name and fame" (rather than "name and shame") those who fought corruption in interesting or unexpected ways.

Such anti-corruption actors and their bottom-up approaches have been explained theoretically by anti-corruption scholars. For instance, della Porta (2018) applies social movement theories – types of action, framing, and resources – to grassroots anti-corruption reforms. From a different theoretical perspective on organization management, Ang (2014) compares the history of IPAB in India and China and found the importance of professionalization and long-term strategies of NGOs in organizing effective anti-corruption movements.

Nevertheless, when focusing on the third actor of citizen-based anti-corruption (i.e. NGOs), there is a puzzle in that these cases and theoretical accounts do not cover one of the most important aspects of the most famous anti-corruption NGO: the role of TI, including TI's national branches, as a think tank. TI not only conducts awareness-raising campaigns and indexes countries' corruption scores, TI Secretariat in Berlin and some of TI's national branches also helps private companies and national governments to combat corruption through involving, consulting, or evaluating anti-corruption policymaking and implementation (della Porta 2018; TI-UK n.d.).

Advocacy and Lobbying in Anti-Corruption Policies and Beyond

Turning to literature on advocacy and lobbying, there are a number of studies which point out the importance of the “accumulation, organization, and transfer” of information (such as arguments, facts, and statistics) from lobbyists to policymakers (De Figueiredo 2002, 126; Weaver 1989). This is recognized and analyzed from the policymakers’ perspective: for example, Head (2008) argues that, in addition to scientific knowledge and political judgement, policymakers also consider practical knowledge provided by NGOs and think tanks (Head 2008, 5-7; see also Haass 2002).

However, while it is argued that think tanks have “a great advantage when working on practical problems” (DeMuth 2007) due to their channels to policymakers via personal consultations and interactions as well as their appointment to advisory bodies (Stone 2017, 152), the direct impact of such practical knowledge provided by think tanks on policymaking is still unclear. Thus, although the main aim of this research note is to contribute to understandings of the impact of anti-corruption NGOs on a national level, this research note also aims to contribute to the understandings of the direct effects of lobbying and advocacy in anti-corruption policies and potentially in other policies.

Framework, Methodology, and Case Selection

This research note applies the framework suggested by Betsill and Corell (2001), shown in Table 1. They suggest analyzing the *data type*, *data source*, and *methodology* to see the effects of NGOs on policymaking. Although the analysis in this research note cannot cover all the questions due to a limited number of primary sources, this study will examine the **transmission of information** and behavior of other actors (*data type*) based on primary texts, secondary texts, and interviews (*data sources*).

In terms of methodology, this research note will use certain elements of causal process tracing methods (i.e. Straw-in-the-Wind Test, Hoop Test, Smoking-Gun Test) (Collier 2011; Ricks and Liu 2018).² These tests correspond to the questions in *data type* in Table 1. Delivering information from NGOs to policy makers (*NGO participation: activities, access, and resources*) and actual discussion on the proposal from NGOs in the negotiation process (*process in goal attainment*) would provide evidence to confirm the relevance of NGOs in the policymaking process (Straw-in-the-

² There are two elements which this research note will not cover: Doubly-Decisive Tests and additional process-tracing tests after the initial investigations. Although Doubly-Decisive Tests and additional process-tracing can help to confirm hypotheses and eliminate other alternative rival hypotheses (Collier 2011; Ricks and Liu 2018), this study will not conduct these tests due to limited available information and difficulties of examining alternative factors in the complex policymaking process.

Wind Test and Hoop Test respectively). If an NGO's proposals change the drafts of the bills (*outcome in goal attainment*), that would be regarded as evidence to confirm the impact of NGOs in the anti-corruption policy legislation (Smoking-Gun Test).

As for the case selection, this study will analyze the effect of TI-UK on the case of the UK Bribery Act 2010. TI-UK is chosen because of its active engagement in policy recommendations, as a former senior anti-corruption advisor at the Department for International Development (DFID) in the UK who reviewed the history of this struggle over anti-corruption policymaking in the UK stated:

TI could always [...] point to an example somewhere in the world where a way of working had been found by a TI Chapter. [...] [I]t marks TI out from many other NGOs who merely shout that a problem needs attention (Obe 2020, 9).

Regarding anti-corruption policies in the UK, this study analyzes the UK Bribery Act 2010 which criminalizes private sector bribery, bribery of foreign public officials, and most notably, facilitation payments (UK Bribery Act 2010; Hough 2017). The UK Bribery Act 2010 is “among the strictest legislation internationally on bribery” (TI-UK n.d.) and “is still considered the international gold standard of anti-bribery legislation, alongside the US Foreign Corrupt Practices Act” around 10 years after the legislation (TI-UK 2021).

The UK Bribery Act 2010 is also one of the most important and impactful cases in UK anti-corruption laws where many actors including TI-UK in addition to DFID – a traditional actor which aims to influence anti-corruption policies of aid recipient countries (Obe 2020) – were involved in the policymaking process. Furthermore, it is worth noting that there was international pressure for the UK government to enact UK Bribery Act 2010 (Alldridge 2012; Hogge 2015; Harrison and Ryder 2016), which may be one of the important factors that enabled NGOs to get “buy-in” from the government (Verdenicci and Hough 2015).

Available reports in the legislation process which include TI-UK's claims and suggestions, research papers on the advocacy campaign of TI-UK as well as information gained from an interview with Robert Barrington³ – the former Director of TI-UK – are used as sources of analysis. Analyzing the case of TI-UK under UK Bribery Act 2010 legislation using the framework of Betsill and Corell (2001) supports theory development of anti-corruption reforms in the UK and potentially in other countries (Mahoney, 2010).

³ He is currently a professor at the University of Sussex (the Sussex Centre of Studying Corruption). The interview was held on March 27, 2020 (via Skype).

Analysis

Starting with the Straw-in-the-Wind Test, TI-UK's involvement in the drafting of legislation shows that TI-UK had *access* to influence the UK Bribery Act 2010 during the legislation process. TI-UK had *access* to comments on the draft of the Act. Through the form of written answers to the questions asked by the committee (*resource*), TI-UK was able to show their disagreement with clause 4 on "legitimately due" test and clause 13 on parliamentary privilege, and make a suggestion on clause 5 that the government can consider penalty enforcement through civil society organizations rather than through legal enforcement (House of Lords and House of Commons 2009). Namely, many of TI's opinions were based on rational and practical knowledge of the OECD Anti-Bribery Convention,⁴ which requests that the UK resolve issues that can only be dealt with by legislating a comprehensive bribery act (Barrington 2020, 8).

In addition, according to the interview with Barrington, TI-UK utilized two more channels of *access* to influence members of parliament in spite of an opposing lobbying campaign from British business organizations (such as Confederation of British Industry (CBI)) and a media campaign by the Evening Standard which is generally supportive of business interests and was against the UK Bribery Act 2010⁵. He recalled in the interview that the first additional source of access was the provision of briefing notes by TI-UK to members of parliaments and the second was meetings with politicians. He also noted in his working paper:

We did not publish these [the rebuttals against CBI's arguments] at once, but held them back and drip fed them in at key moments of the parliamentary debates – usually in the form of briefing papers which we circulated to those we knew had an interest or influence or were likely to speak in the debates (Barrington 2020, 8).

Regarding the latter access, Barrington stated in an interview that TI-UK utilized its position of “expert, independent, and neutral” and succeeded in cooperating with supportive members in the House of Lords as advisors. This helped TI-UK to connect with important policymakers such as ministers, including the Minister of Justice. In other words, as visualized in Figure 1 on the policymaking process of the UK Bribery Act 2010, TI-UK succeeded in having strong channels to not only policymakers in general, but also relevant ministers through the members in the House

⁴ According to Barrington's working paper, CBI and TI were “the main protagonists outside parliament” during the legislation process of the UK Bribery Act. From his point of view, CBI – the main opponent of the bill – made “itself [CBI] look trivial and ill-informed”, after CBI argued “because the lower limits of hospitality were not defined, a company might face prosecution for offering even a cup of coffee in a meeting with a public official” (Barrington 2020, 11).

⁵ In an interview with the author via Skype on March 27, 2020.

of Lords. This evidence clearly confirms *participation* of TI-UK in the UK Bribery Act 2010 (i.e. it passes the Straw-in-the-Wind Test).

Table 1: The framework of the analysis of the effects of NGOs on policymaking

	Intentional transmission of information	Behavior of other actors
Data Type	<p><i>NGO participation</i></p> <p><i>Activities:</i> What did NGOs do to transmit information to decision makers?</p> <p><i>Access:</i> What opportunities did NGOs have to transmit information?</p> <p><i>Resources:</i> What sources of leverage did NGOs use to transmit information?</p>	<p><i>Goal attainment</i></p> <p><i>Outcome:</i> Does the final agreement contain text drafted by NGOs? Does the final agreement reflect NGO goals and principles?</p> <p><i>Process:</i> Did negotiators discuss issues proposed by NGOs (or cease to discuss issues opposed by NGOs)? Did NGOs coin terms that became part of the negotiating jargon?</p>
Data Source	<p><i>Primary texts</i> (e.g. draft decisions, country position statements, the final agreement, NGO lobbying materials)</p> <p><i>Secondary texts</i> (e.g. media reports, press releases)</p> <p><i>Interviews</i> (e.g. government delegates, observers and NGOs)</p> <p>Researcher <i>observations</i> during negotiations</p>	
Methodology	<p><i>Process tracing</i></p> <p>What were the causal mechanisms linking NGO participation in [anti-corruption] negotiations with their influence?</p>	

Source: Betsill and Corell (2001, 79); removed the data source which are specifically on international environment policies.

Table 2: TI-UK's memorandum and impact

Clause	TI-UK's Memorandum	Result
<p>Clause 4 (3)(b)</p> <p>Bribery of foreign public officials</p>	<p>“In TI(UK)’s view, the test should be removed from Clause 4, and not replaced by a requirement that the payment be ‘undue’ or ‘improper’. The OECD Convention requires that payments to foreign public officials be criminalized; and that should be our standard. We doubt the risk that “innocent” conduct will be criminalized, because prosecutors are unlikely to prosecute if the circumstances are plainly innocent. The risk is the far greater one that companies will make payments to foreign public officials under cover of ‘fuzziness’ of domestic law, or a spurious legal opinion.”</p>	<p>“Legitimately due” test was removed from the Bribery Act 2010.</p> <p>Bribery Draft Legislation: P Bribes F if, and only if – <u>(b) the advantage is not legitimately due to F, or (if offered, promised or given to another person as mentioned in paragraph (a)) it would not be legitimately due if offered, promised or given to F.</u></p> <p>Bribery Act 2010 (clause 6 (3) (b)): P Bribes F if, and only if – <u>(b) F is neither permitted nor required by the written law applicable to F to be influenced in F’s capacity as a foreign public official by the offer, promise or gift.</u></p>
<p>Clause 5</p> <p>Failure of commercial organizations to prevent bribery</p>	<p>“Clause 5 should be turned into a civil regulatory regime for imposing fines on companies rather than imposing a criminal offence.”</p>	<p>TI’s suggestion was not reflected on the Bribery Act 2010 (clause 7).</p>

Table 2: TI-UK's memorandum and impact (cont'd)

Clause	TI-UK's Memorandum	Result
Clause 13 Authorization of intelligence services	“TI(UK) opposes the entire Clause 13 of the draft Bill. ... The OECD Working Group on Bribery is aware of no provision of law anywhere whereby bribery is expressly sanctioned. While we welcome the Government's openness in acknowledging that bribery may be used by the security services, we have the gravest doubts as to whether any worthwhile long-term national interest is served. If the security services can make a case for such an “opt-out”, they should present it for appropriate parliamentary scrutiny; and it should form no part of any general law of bribery.”	Removed from the Bribery Act 2010

Source: Ministry of Justice 2009, 27; House of Lords and House of Commons 2009, 284-285; UK Bribery Act 2010, 6-7.

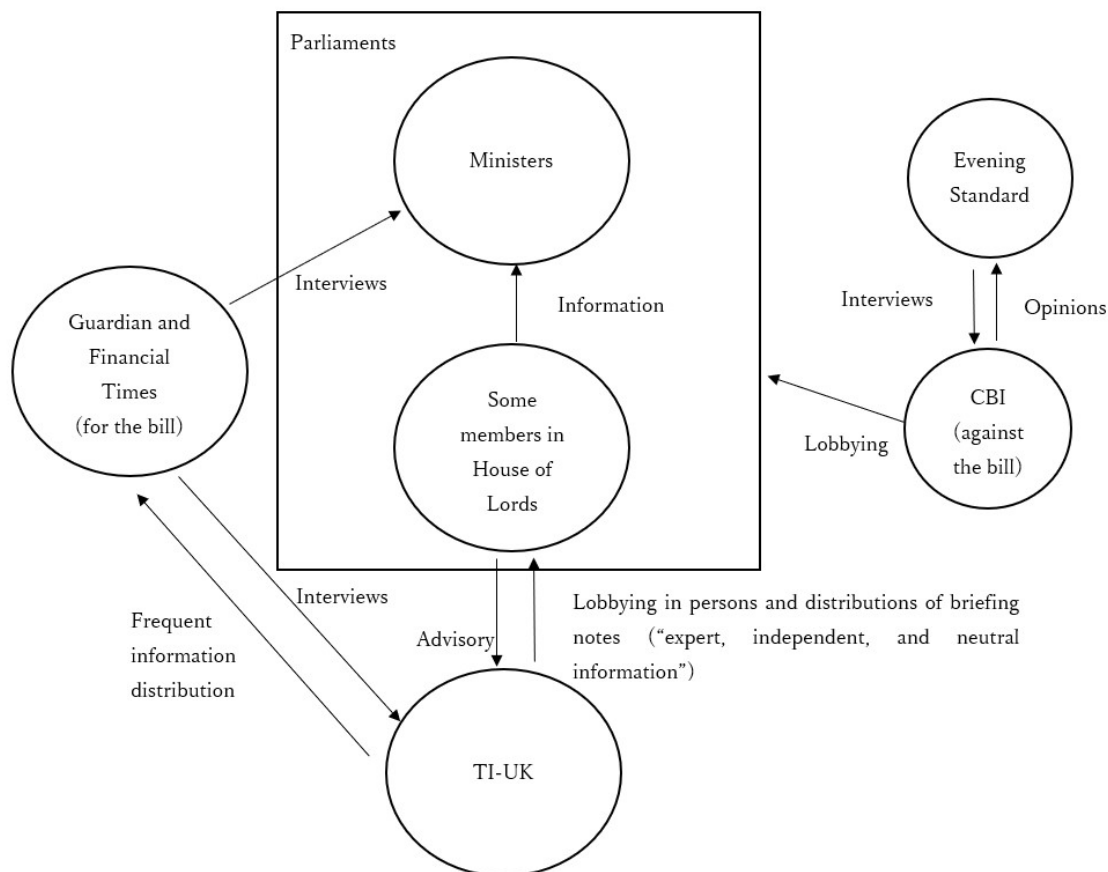
For the second test, the Hoop Test, there is enough evidence for passing the test in that the members of parliament discussed the issues with members of TI-UK in a special committee for an official guidance for companies in the future implementation of the UK Bribery Act 2010 (*process*). Barrington – the Director of TI-UK at that time – explained in the interview that he and another member of TI-UK were also members of the special committee in the parliament with selected parliamentarians which was designated to discuss what to include in the official guidance and how specific the guidance should be.

Thirdly, as for the *outcome*, there is some evidence to conclude TI-UK has enough influence to pass the Smoking-Gun Test (i.e. enough effects on the outcomes). One of them is the extent of reflection of TI-UK's comments, most of which were in accordance with the OECD Anti Bribery Convention, in the UK Bribery Act 2010. As shown in Table 2, the final version of the UK Bribery Act 2010 does not include two clauses (clause 4 “legitimacy due” test and the entire clause 13) opposed by TI-UK through the memorandum although TI-UK's suggestion on

clause 5 (legal-enforcement-base punishment) was not reflected in the final decision (House of Lords and House of Commons 2009; UK Bribery Act 2010). Given that the opinion on clause 5 was a “suggestion” rather than “disagreement” and another successful outcome of the final official guideline, these outcomes are enough to show that the opinions of TI-UK were reflected in the UK Bribery Act 2010.

Another piece of evidence is TI-UK’s influence over the final decision of the official guidance of UK Bribery Act 2010 which was published in 2011. According to the interview with Barrington, not just TI-UK was involved in the negotiation process of the official guideline, but also TI-UK managed to lead the special commission to publish the official guidance which is quite similar to the one TI-UK suggested right after the legislation of UK Bribery Act 2010.

Figure 1: A simplified visualization of anti-corruption network in the legislative process of the UK Bribery Act 2010



Source: Author.

Conclusion

There is increasing academic and practical interest in the role of NGOs in fighting against corruption. Using the causal process-tracing analysis in the case of TI-UK with the framework of Betsill and Corell (2001), this analysis showed TI-UK not only involved in the drafting of

legislation but also had an impact on the outcomes during the legislation and initial implementation processes. TI-UK provided practical knowledge to policy makers for policymaking, especially policy amendments and decisions, under the international pressure on the UK government in anti-corruption reforms. This analysis also hints at the potential of anti-corruption NGOs' impact on anti-corruption policies in other countries, depending on other domestic and international factors such as the level of democracy (Kolstad and Wiig 2016). Furthermore, this study succeeded in providing valuable interview data from the former Director of TI-UK, aside from data from the draft and the final versions of the UK Bribery Act 2010 and other secondary sources. In the context of the study of lobbying and advocacy, this study also suggests that NGOs as think tanks can directly affect targeted policies, especially in terms of policy amendments and decisions.

As this research note does not cover sources related to other relevant actors aside from TI-UK, the relative effects of TI-UK in comparison to other actors involved in the policymaking process – such as civil servants, other politicians, legal specialists, and academics, and the applicability of findings in this study to anti-corruption NGOs in other countries should be addressed in future research to better understand their effects on anti-corruption policies in the UK and beyond.

Disclaimer

The views, thoughts, and opinions expressed in this research note are those of the author and do not necessarily reflect those of the organizations that the author is affiliated with.

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