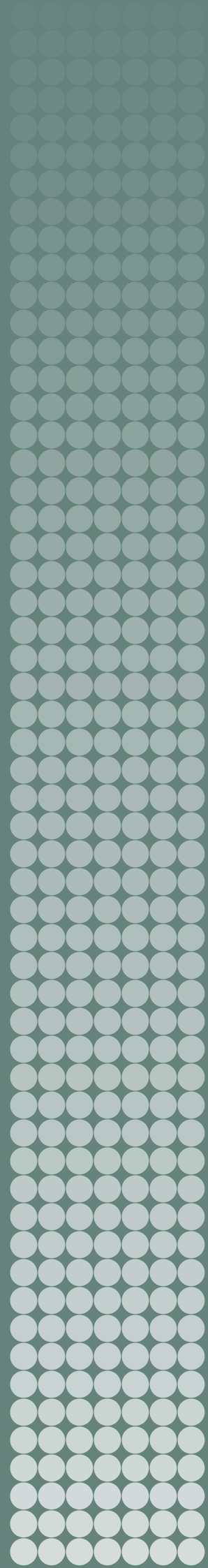


POLICY IMPACT ASSESSMENT REPORT ON THE NATO BUILDING INTEGRITY PROGRAMME

BY MARINA CAPARINI, ANASTASIA ALADYSHEVA AND
GARY MILANTE





This study is funded by the NATO Building Integrity Trust Fund. Contributing nations to the Trust Fund are the Czech Republic, Denmark, Finland, Norway, Poland, Switzerland and the United Kingdom.

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June 2018



**STOCKHOLM INTERNATIONAL
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Abbreviations

BI	Building integrity
CIDS	Centre for Integrity in the Defence Sector (Norway)
GRECO	Council of Europe's Group of States Against Corruption
HQ	Headquarters
MOD	Ministry of Defence
NATO	North Atlantic Treaty Organization
NGO	Non-governmental organization
PRP	Peer review process
SAQ	Self-assessment questionnaire
SBGSU	State Border Guard Service of Ukraine

Executive summary

The NATO Building Integrity (BI) Programme is a defence capacity-building programme that aims to provide member states, partners and other states with tailored support to reduce the risk of corruption and enhance the understanding and practice of good governance in their defence establishments. This assessment examines the impacts achieved since the previous assessment was conducted in 2014. The assessment is based on statements of impact made in questionnaires completed by serving defence department officials of participating states. These have been cross-verified, where possible, using interviews with implementing partners and independent civil society experts.

The main finding is that the programme is viewed as highly beneficial by many stakeholders. Most of the defence officials of participating states were able to identify numerous changes implemented as a result of involvement in the programme and the impact identified by defence ministries is greater than that observed in the 2014 assessment. The interviews with implementing partners and civil society representatives generally supported these findings, and respondents saw the programme as necessary and highly valued. Respondents identified a number of challenges going forward: (a) sustaining the momentum of integrity reforms; (b) a lack of transparency in some participating states, which have not published a peer review report and action plan; (c) political instrumentalization by some governments of their involvement in the programme; and (d) limited success to date in mainstreaming defence integrity in all NATO member states and their armed forces.

The main recommendations are that: (a) the self-assessment questionnaire and peer review process should be refined and new tools developed; (b) expert networks should be developed; (c) building integrity should be further mainstreamed within NATO and its member states; (d) more systematized communications with stakeholders; and (e) regular monitoring and evaluation should be conducted.

This assessment was undertaken by researchers at the Stockholm International Peace Research Institute (SIPRI). SIPRI is an independent international institute dedicated to research into conflict, armaments, arms control and disarmament. Established in 1966, SIPRI provides data, analysis and recommendations, based on open sources, to policymakers, researchers, media and the interested public. As part of SIPRI's ongoing work on peace and development, it evaluates the impact of projects and initiatives for a number of donors and organizations. Based in Stockholm, SIPRI is regularly ranked among the most respected think tanks worldwide.

1. Introduction

The Building Integrity (BI) Programme is a defence capacity-building programme that has been implemented by NATO since 2007. The programme is designed to provide NATO member states and partner countries with tailored support to reduce the risk of corruption in the defence and related security sectors, embed good governance principles and practices into their defence establishments and understand corruption and poor governance as security challenges. Participation in the BI Programme is on a voluntary basis. The programme is supported by a NATO trust fund based on voluntary contributions. It is led by four member states, Bulgaria, Norway, Poland and the United Kingdom, and one partner, Switzerland. This study was funded by contributions to the NATO Building Integrity Trust Fund from the Czech Republic, Denmark, Finland, Norway, Poland, Switzerland and the UK.

The Programme has had three phases to date. In phase 1 (2007–10) and phase 2 (2011–14), the programme tools were designed in cooperation with Transparency International and other experts, and the first member states and partners began to use the BI diagnostic tools. By the end of phase 3 (2015–18), 19 states had decided to complete the BI self-assessment questionnaire (SAQ) and peer review process (PRP).¹

In addition to the seminars, courses and other education and training activities that are open to all NATO member states and partners, the BI SAQ and PRP provide tailored support for each participating state. Figure 1.1 shows the implementation cycle. First, a state fills in the SAQ, which is a diagnostic tool that provides a snapshot of a state's existing procedures and practices. This addresses: (a) current business practice in the defence and security sector; (b) the level of democratic control and engagement; (c) national anti-corruption laws and policies; (d) anti-corruption policy in the defence and security sector; (e) personnel-related codes of conduct, policy, training and disciplinary procedures; (f) planning and budgeting; (g) operations; (h) procurement; and (i) engagement with defence companies and suppliers. The SAQ is primarily intended to be used by ministries of defence but some states have used it with other ministries in the security sector. It is on this basis that the NATO BI Programme develops bespoke support with capacity building.

The completed SAQ is then forwarded to the NATO International Staff, which reviews the SAQ and leads the PRP. The review is carried out by a team of subject matter experts, which undertakes country consultations with government representatives. The aim of the PRP is to better understand the existing situation, and exchange views on best practices and the practical steps needed to strengthen transparency, accountability and the integrity of the defence and security sector. The NATO BI team recommends that the SAQ and PRP include contributions from parliamentarians and civil society, such as non-governmental organizations (NGOs), the media and academics. The key outcome of this process is a peer review report, which identifies good practices and gaps, and makes recommendations. The NATO International Secretariat also offers support with the development of a national action plan and a programme of activities to promote good practices. Some states have chosen to repeat the cycle.

¹ Phase III was extended to the end of 2018. The 19 are: Afghanistan, Armenia, Bosnia and Herzegovina, Bulgaria, Colombia, Croatia, Georgia, Hungary, the Kyrgyz Republic, Latvia, the Republic of Moldova, Montenegro, Norway, Poland, Serbia, the former Yugoslav Republic of Macedonia (FYROM), Tunisia, Ukraine and the United Kingdom. Turkey recognizes the Republic of Macedonia by its constitutional name.

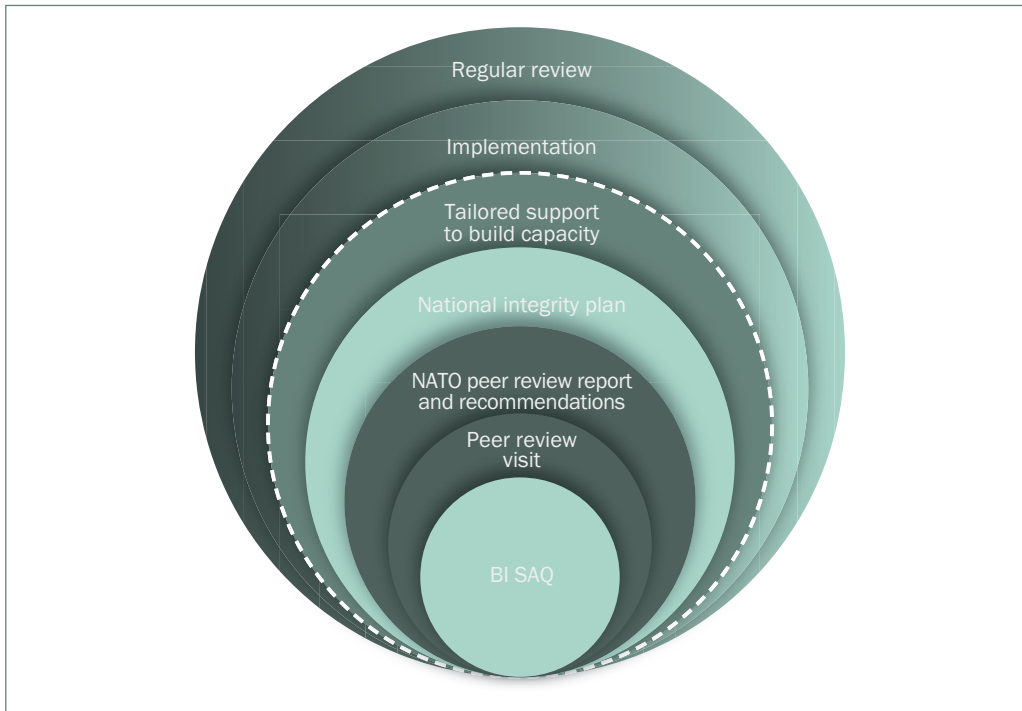


Figure 1.1. Implementation cycle of the Building Integrity Programme

Source: NATO Building Integrity Team's conceptualization.

In addition to the SAQ and the PRP, NATO has produced several tools to assist with mainstreaming. The NATO Heads of State and Government established BI as a NATO discipline and agreed on the development of a BI Education and Training Plan at the NATO Summit in Chicago in 2012. NATO Heads of State and Government also endorsed the Building Integrity Policy at the NATO Summit in Warsaw in 2016.²

² NATO Building Integrity Policy, Endorsed by the Heads of State and Government at the NATO Summit in Warsaw, 8–9 July 2016. For a Building Integrity log-frame, see Appendix A.

2. Assessment design

In 2014, the then 11 states participating in the BI SAQ and PRP were invited to share lessons learned and provide feedback on the impact of the programme. All of the 11 states that had taken part in the SAQ and the PRP by the end of December 2013 responded to the survey. The survey results were described in a 2014 report.³

The current assessment undertaken by the Stockholm International Peace Research Institute (SIPRI) constitutes the second assessment of the BI Programme and the first assessment to be conducted by an independent external party. SIPRI was asked to update the 2014 report, to report on ongoing efforts to mainstream the NATO Building Integrity Policy and to make recommendations on further strengthening the NATO BI Programme for 2018–20. While SIPRI was compensated by the NATO International Secretariat for this assessment, it is an independent assessment and the findings have not been influenced by NATO BI.

In the autumn of 2017, the NATO International Secretariat invited the 19 states that have participated in the NATO BI SAQ and PRP to complete a survey and attend a roundtable to review the results. As of 23 May 2018, 17 of the 19 countries had provided feedback.⁴ Survey responses were provided by the participating countries' defence ministries, with the exception of Ukraine which provided three separate reports by the State Border Guard Service of Ukraine (SBGSU), the National Guard of Ukraine and the Security Service of Ukraine. The survey feedback is discussed in section 3.

Of the 29 NATO member states, 8 have participated in the SAQ/PRP and completed the 2017 survey: Bulgaria, Croatia, Hungary, Latvia, Montenegro, Norway, Poland and the UK. (The UK had completed the SAQ and received the first draft of its peer review report but not yet completed the PRP visit at the time of the assessment.)

Semi-structured interviews were conducted to supplement the survey:

- During the NATO BI roundtable meeting to discuss the survey results, 10 face-to-face interviews were conducted with 14 representatives of states that have either participated in the SAQ/PRP or are planning to do so.⁵
- Six face-to-face interviews with serving or former representatives of participating states were conducted at meetings in Stockholm and Brussels between November 2017 and January 2018.
- 18 interviews were conducted by telephone or Skype and email. Most (13) of these involved current or former 'implementing partners' of the BI Programme, such as representatives of integrity-related institutes and programmes, representatives of NGOs, independent consultants and academics. Four other civil society representatives were also interviewed. They were not directly involved in the BI Programme as implementing partners, but were familiar with security and defence integrity issues in their countries, which are participating in the SAQ/PRP. One respondent representing a contributing state to the NATO BI

³ See NATO, 'Building Integrity Report on Nations Assessment of Impact of Building Integrity and Contribution to Capacity Building', PPC-N(2014)0087, 9 May 2014. Findings republished in NATO, 'Building Integrity: Impact on Nations and Contributions to Capacity Building'. The 11 were Afghanistan, Bosnia and Herzegovina, Bulgaria, Croatia, Georgia, Hungary, Latvia, Montenegro, Norway, Serbia and Ukraine.

⁴ These countries are Afghanistan, Armenia, Bosnia and Herzegovina, Bulgaria, Colombia, Croatia, Georgia, Hungary, Latvia, the former Yugoslav Republic of Macedonia (FYROM), the Republic of Moldova, Montenegro, Norway, Poland, Serbia, Ukraine and the United Kingdom. The Kyrgyz Republic and Tunisia did not respond to the survey.

⁵ The meeting took place in Budva, Montenegro, on 14–16 Dec. 2017.

Trust Fund was also interviewed. (In addition, implementing partners from four lead states in the Trust Fund were among the 13 interviewees listed above.)

Each interview was based on a list of questions and covered general views on the implementation of the BI Programme; details of implementation, such as whether the full cycle had been implemented; perceptions of how successful the programme had been; the extent of engagement of senior officials and civil society; and lessons learned and ways forward.⁶

Methodological limitations of impact attribution, self-assessment and structured interviews

In assessing a complex, voluntary and relatively small (19 test subjects) programme like NATO BI, drawing on evidence from self-assessment and semi-structured interviews, it is important to be clear about the limitations. Three issues associated with impact assessment are discussed below: attribution, self-selection bias and intrinsic bias. In describing these limitations, there is no evidence that these biases affected the current study. Nonetheless, the results should be interpreted with caution. These limitations do not detract from the main findings of this report, which are very positive, but instead point the way forward to steps that could be taken to increase confidence when assessing impact in future. The report's recommendations include suggestions on how to reduce these limitations in future rounds of NATO BI assessment, while remaining cognizant of the fact that academic standards of evaluation are expensive, time-consuming and not always practical.

Attribution

The many parallel processes aimed at countering corruption in government ministries and institutions make it difficult to attribute all integrity-focused reforms in the defence and security sector to the impact of the NATO BI SAQ and PRP. This applies particularly to changes in government systems, processes and procedures, and national legislation. Some states did not delineate the source of impact in their survey response. One exception was the Norwegian defence ministry, which explained in its survey response that procurement and pre-deployment training procedures are regularly reviewed and an action plan has been developed, but these are not outcomes of the SAQ and PRP. Nonetheless, Norway's participation in the SAQ and PRP was viewed as having resulted in greater emphasis in leadership activities and training on tackling corruption, ethical aspects of recruitment and guidelines on ethical standards in the defence industry. Another exception was the British survey response, which ascribed change to other British anti-corruption initiatives but similarly saw value in the SAQ process as another means for self-assessing and improving existing approaches.

In addition, some states that participate in the NATO BI SAQ and PRP are also the beneficiaries of bilateral anti-corruption and good governance training and capacity-building programmes. For example, two NATO member states participating in BI have their own active integrity capacity-building programmes: Norway's Centre for Integrity in the Defence Sector (CIDS), which is part of its defence ministry; and Building Integrity UK, which was established by the UK Defence Academy. Both offer training and technical assistance to a number of states that also participate in NATO BI. NATO BI complements these bilateral programmes on building integrity. Non-governmental actors such as Transparency International and the Belgrade Centre

⁶ See Appendix B for the interview script.

for Security Policy also produce anti-corruption tools and conduct integrity training and seminars with various states and military forces, including some participating BI states. These examples highlight the need for careful attribution of impact. Which particular changes are attributable to BI and which are due to other efforts and processes is difficult to ascertain without more information about parallel internal and externally provided integrity efforts. Furthermore, independent indicators of corruption and integrity, which are themselves both contentious and complex, would also be necessary. A mapping of all anti-corruption and integrity activities, with baselines and indicators monitored over time, would be required to ascertain the impact of a single initiative such as NATO BI. In many ways, experiential indicators such as those achieved through the self-assessment process are the most practical and lowest cost indicators that it is possible to derive in order to assess attribution. They do, however, introduce two forms of bias.

Self-selection bias

Participation in the NATO BI Programme, with its SAQ and PRP, is voluntary. This creates a self-selection problem when attempting to ascertain impact. Just as medical trials require a control group to assess impact, so too are programme assessments limited without a control group. Unlike clinical trials, which use randomized controls, there is no control group that is not given the treatment (NATO BI) in order to assess its impact. The participating states in NATO BI are those in which the leadership is willing and has the institutional capacity to change. They are therefore self-selecting and more likely to benefit from the programme. Furthermore, five NATO BI participating states did not complete the survey questionnaire. If the outcomes from surveys or other indicators with the same group of states—or more practically a good comparator group of states with similar features but that did not participate in the programme—could be compared, more rigorous evidence could be obtained.

Intrinsic bias

Because corruption and integrity are complex, and the actors being asked for their assessments are personally vested in the outcome, intrinsic bias is another concern with the assessment. The views of a diverse group of actors and sources would provide a more complete understanding of the strengths and weaknesses of the programme. In the majority of national cases, *independent* views on the impact of the SAQ and the PRP on each country's defence and security sector were absent. With the exception of just three states, there were no respondents who were not either serving or former ministry of defence officials but could nonetheless comment knowledgeably on the programme's impact on the country's defence sector. Without the ability to systematically cross-verify data—in this case the perceptions of impact of ministry officials in participating states—with alternate sources, there will be a problem of intrinsic bias. It was to mitigate this effect that implementing partners and other non-governmental experts familiar with the programme were interviewed.

3. Results compiled from the responses of state representatives

Figure 3.1 shows the results of the feedback survey completed by the representatives of 17 states.⁷ The table in Appendix C provides detail for individual states. As in the 2014 survey, the results suggest a positive impact of the BI Programme on all outcomes. There are two useful methods of ordering the positive survey responses. The first is to arrange the data by the number of positive responses to each area in the 2018 survey. The second is to compare the responses from the 2014 survey with those of the 2018 survey.

Areas most affected according to 2018 survey responses

Figure 3.1 shows that most of the states implemented the BI tools and could identify positive changes linked to the BI Programme. A minimum of nine respondents made positive responses in each of the areas.

A high number of positive responses (between 14 and 19) was observed in relation to the outcomes engagement by senior management with the SAQ/PRP (18), increased awareness concerning corruption risks, ethics and integrity (18), additional education and training needs identified concerning ethics, integrity or corruption risks (18), contribution to the other BI activities and/or other international anti-corruption efforts (17), establishment of a permanent structure to implement and promote good practices (16), appointment of a Building Integrity point of contact for the conduct of the SAQ/PRP (16), establishing new procedures and systems, such as training, codes of conduct or ethics, whistleblowing and so on (16), establishment of new education and training courses or programmes concerning anti-corruption, ethics or integrity (15), changes in government policies regarding education, or anti-corruption planning, strategies or workplans (14), and changes considered to procedures for procurement and the acquisition or disposal of excess defence property (14).

Between 10 and 12 respondents noted that that the BI Programme led to the development of an action plan and review mechanism to monitor implementation (12), changes in human resource management policies, including on recruitment, career development and professional development (12), changes in business practices with defence suppliers or policies regarding due diligence (12), changes in relations between the defence and security sector and civil society (12), changes in national legislation on fighting corruption (11) and the application of lessons learned to pre-deployment training of follow-on contingents (10).

Finally, around half the respondents observed improvements in the revision of procedures for capturing anti-corruption lessons learned from the deployment of forces abroad (9) and changes in designation procedures on sensitive positions (9).

In addition, a number of participating states validated their general responses with concrete examples of developments specific to their case related to the outcomes discussed in the survey responses.

In many participating states, governments have established an overarching anti-corruption unit, strategy and/or policy for all ministries. This highlights the attribution-related challenges of identifying NATO BI-specific impacts, as these developments might also be due to the general state-level commitment to build integrity in all institutions, which precipitated their joining NATO BI. Similarly, in

⁷ See note 4. Ukraine sent 3 responses (see above). If any of these indicated 'yes', this was counted as an additional one.

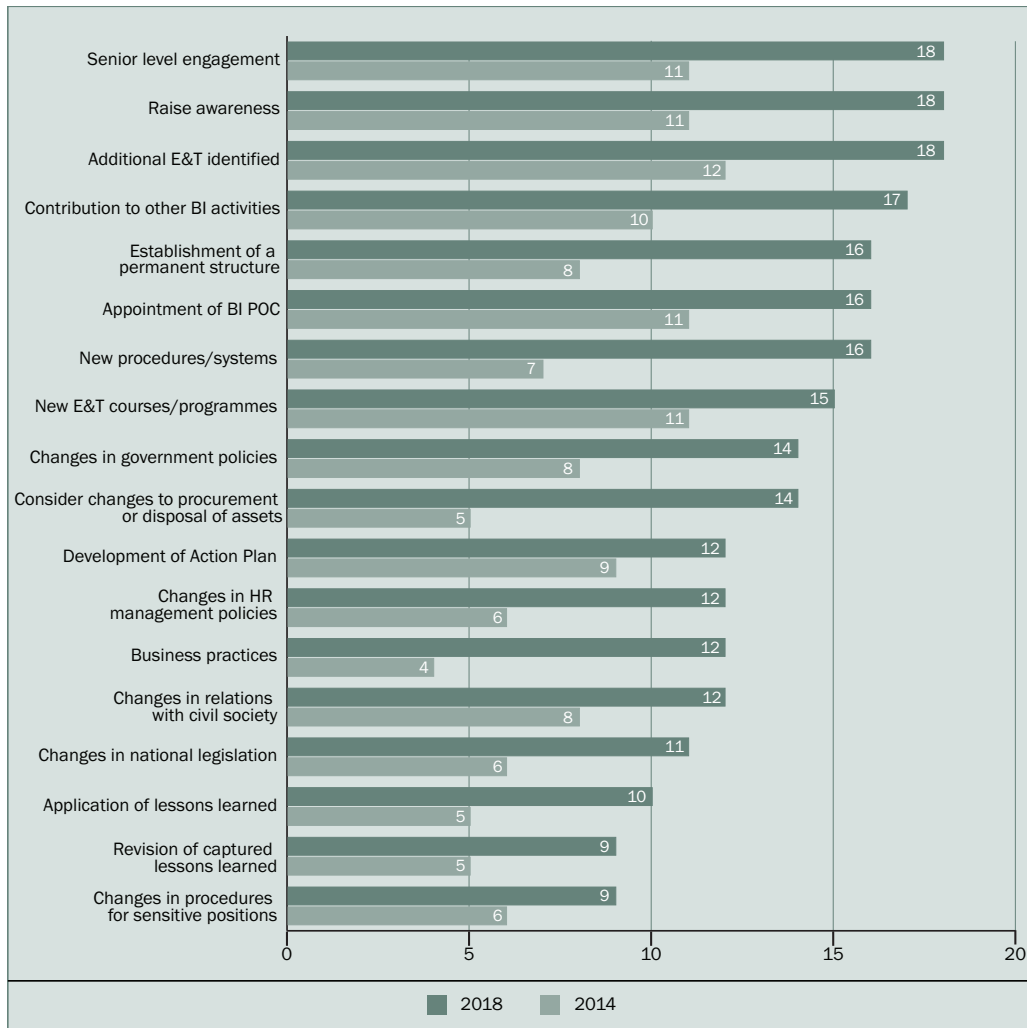


Figure 3.1. Results from the 2014 and the 2018 feedback surveys

Note: Figure is sorted in ascending order of positive responses in 2018.

terms of changes to national legislation, although many states indicated that there has been an impact (marked ‘Yes’), numerous respondents noted that this is not solely attributable to the BI Programme but also linked to wider state actions to combat corruption in ministries.

Permanent structures to implement and promote good practices were established in the following countries:

- Afghanistan: a permanent unit and an anti-corruption strategy
- Armenia: a Human Rights and BI Centre
- Bosnia and Herzegovina: the Ministry of Defence (MOD) Inspector General’s Office has been designated to promote and coordinate MOD activities on BI
- Bulgaria: a Counter-corruption and Unlawfully Acquired Assets Forfeiture Commission
- Colombia: a ‘Three Defence Model’ system
- Croatia: a permanent unit at the Ministry of Justice
- Georgia: a BI and Anti-corruption Environment Monitoring Council

- Hungary: a five-member BI branch
- Latvia: a permanent unit at the Audit and Inspection Department
- The former Yugoslav Republic of Macedonia (FYROM, Macedonia): a working group on BI issues
- Republic of Moldova: a permanent special office within the General Inspection Directorate of the MOD
- Montenegro: a permanent unit at the level of the General Staff and in all units of the army
- Norway: a Centre for Integrity in the Defence Sector
- Poland: a Bureau on Anti-corruption Procedures in the Ministry of National Defence
- Ukraine: a Centre for Corruption Risk Prevention and the Integrity of the State Border Guard Service of Ukraine
- United Kingdom: a Fraud Defence Training and Awareness Team

As a result of the work on the SAQ and the PRP, government policies were revised and new procedures or systems were established in a number of countries. In Bosnia and Herzegovina, for example, this resulted in the establishment of: an MOD Policy on Building Integrity, Risk Reduction and Combating Corruption; a committee and an Expert Group in charge of monitoring, guiding and implementing the policy; an Integrity Plan and Plan for the Fight against Corruption for 2015–19; criteria, a methodology and a risk assessment of standard procedures in the MOD; and a code of ethics for military personnel in the MOD and the armed forces.

In the Republic of Moldova this resulted in the organization of different information campaigns on corruption with the MOD and the army. The results of the BI Programme were incorporated into a National Anti-corruption Strategy, 2011–16, as well as documents on Moldova-NATO cooperation, such as the Individual Partnership Action Plan and the Planning and Review Process.

In Ukraine, the SBGSU mentioned the development of a code of conduct for staff in the field of border management, departmental standards on the culture of border control, and practical advice on professional ethics and the prevention of corruption, among other things.

Other country representatives also described changes in government policies, procedures and systems:

- Armenia: the MOD initiated an ‘honesty test’ to assess corruption risks
- Bulgaria: preventive counter-corruption procedures as set out in the Counter-corruption and Unlawfully Acquired Assets Forfeiture Act
- Colombia: changes to military courses and doctrine
- Croatia: approximately 126 measures have been endorsed for further implementation as part of an interagency approach at the state level. A code of ethics for civil servants was adopted in 2011, along with guidelines for its implementation
- Georgia: a BI and corruption risk reduction training curriculum has been developed. Since 2014, this training has been held at the MOD three or four times a year. Participants are invited from the MOD, the General Staff, the Armed Forces and wider security agencies in Georgia

- Hungary: new courses and a training methodology have been developed on the issues of ethics and integrity, and the BI Strategy and action plan have been integrated into MOD procedures
- Latvia: legislation limiting access to sensitive information was proposed by the MOD and the National Defence Forces in 2017 and 2018
- Montenegro: a proposed new Law on the Armed Forces was considerably amended based on the SAQ and the PRP. The changes are related to selection processes for recruitment in the armed forces, promotion for military personnel, education, conflicts of interest and the refusal of gifts in situations linked to official duties, among other things
- Poland: anti-corruption issues are now addressed for military personnel serving abroad
- Serbia: an analysis has been made of existing capacities for education on building integrity in the MOD and the armed forces, and a plan of activities on building integrity has been adopted on an annual basis since 2014. This includes coordination of the implementation of activities and the design of new education modules on building integrity

Among the concrete examples of changes in states' business practices in relation defence suppliers or related policies were:

- Colombia: the Ministry of National Defence has reviewed its policy on business practices
- Croatia: the MOD organizes annual presentations on its procurement plan for the MOD and the armed forces, and publishes the plan on its website to invite bids
- Montenegro: the law on public procurement has been changed and certain regulations in this area have been established
- Serbia: the MOD representative reported significant improvements in the operating procedures of the MOD and defence industry companies

According to the survey responses from participating states, there have been a number of changes to procedures on procurement, and the acquisition or disposal of excess defence property, as well as human resources management:

- Afghanistan: a procurement commission has been established
- Armenia: the creation of a whistleblowing hotline at the MOD
- Croatia: the establishment of an independent section for public procurement and an independent section for internal auditing, as well as the nomination of a contact person for irregularities and a contact person for public access to information within MOD structures
- Croatia: a significant reduction in secrecy about procurement
- Georgia: integrity is incorporated into human resources policy documents as a matter of principle, and in the performance appraisal forms used to assess all MOD civil servants
- Montenegro: new policies and procedures related to human resource management, procurement and the disposal of surplus defence equipment

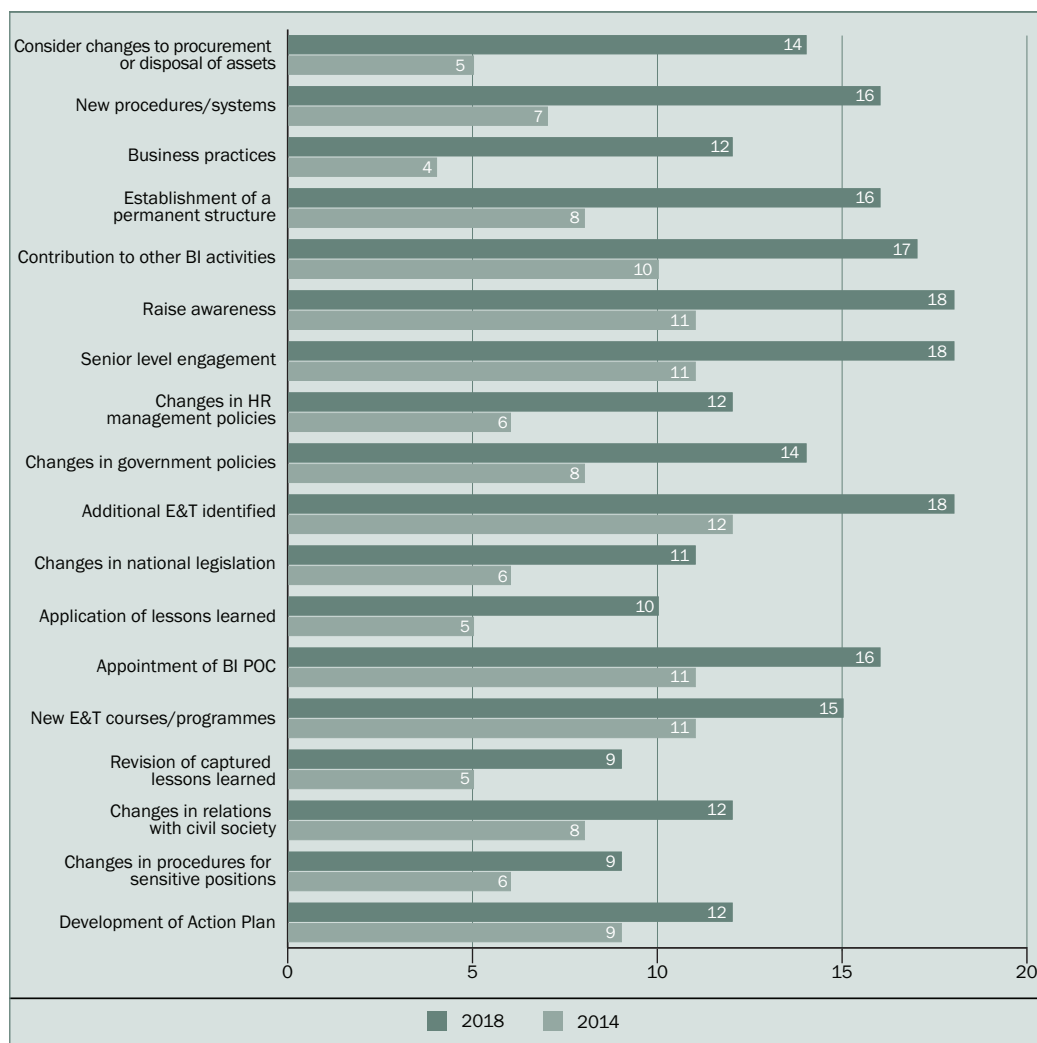


Figure 3.2. Results from the 2014 and the 2018 feedback surveys

Note: Figure is sorted by the largest difference between the years.

Some of the national representatives provided examples of improvements in the relationship between the MOD and civil society, including the media, NGOs and academia:

- Bulgaria: cooperation with civil society is more transparent and is governed by principles set out in the new Counter-corruption and Unlawfully Acquired Assets Forfeiture Act
- Bosnia and Herzegovina: the MOD shared the peer review report with local NGOs and uploaded the report on to its website. Similarly, the MOD website provides regular information on its annual budget, annual procurement plans, public tenders, personnel employment and so on. Together with NGOs, the MOD has implemented a corruption hotline. Guest speakers from NGOs are invited to MOD public events on a regular basis
- Colombia: there have been efforts to improve the relationship between the MOD and civil society
- Croatia: while there has been no significant change in the relationship between the MOD and civil society since 2014, a person was appointed that year to implement the public access to information policy within

existing MOD structures, and a public transparency procedure regarding procurement and all relevant legislation has been introduced

- Georgia: the Institute for Development of Freedom recognized the MOD for its improvement in public information disclosure in 2012
- Moldova: the peer review report was published on the MOD website and the results of the SAQ and PRP were made public. Representatives of local NGOs and the MOD jointly participate in conferences on BI. Regular press releases about the activities of the department are published on the MOD website
- Montenegro: an Integrity Plan was presented to NGOs, leading to analysis and feedback from civil society
- Serbia: The Belgrade Centre for Security Policy, an independent think tank, analyses issues related to BI and submits the results of surveys to the MOD on a regular basis
- Ukraine: the SBGSU reports an increase in trust in the SBGSU from among the public, based on reports by the Organization for Security and Co-operation in Europe and the UN. The National Guard reported the appointment of an NGO to exercise independent control over the implementation of the tasks and measures in its anti-corruption programme

Finally, the survey results found a vast number of activities on education and training in many countries. These activities are aimed at staff within the MOD or at armed forces personnel. Some were specifically developed for personnel who are to be deployed abroad.

These results were confirmed at the roundtable discussion in December 2017, at which various MOD representatives mentioned significant improvements linked to engagement with the NATO BI Programme.

Differential responses: comparing the 2014 and 2018 surveys

Another way to examine the results is to compare the responses from the 2014 survey with those of the 2018 survey and identify the outcomes for which there has been positive long-term change. Figure 3.2 shows the outcomes sorted by the degree of difference between the 2014 and the 2018 surveys. The difference is largest for changes to procurement and the disposal of assets, the establishment of new procedures and systems, such as training or codes of conduct or ethics, and consideration of changes to business practices or policies on defence suppliers.

The smallest change can be observed in: (a) the adoption of action plans or a review mechanism for monitoring implementation; (b) the adoption of procedures for designating positions sensitive and requiring the vetting of new personnel; (c) changes in relations with civil society; and (d) revision of procedures to capture anti-corruption lessons learned from the deployment of forces abroad. The development of an action plan is a long-term process, so slow change in this outcome is to be expected. Action plans have been developed by all the states with the exception of Armenia, Croatia and Hungary; Ukraine's State Border Guard Service and National Guard, which deemed the question to be beyond the bounds of their competence; and Norway and the United Kingdom, which have action plans in place that were developed in response to other governmental processes rather than the SAQ and the PRP. Changes in the designation procedures for sensitive positions are probably associated with the introduction of new information collection tools, training and commitments, all of which require time

Box 3.1. Major progress identified by comparing survey responses, 2018 to 2014

- High level engagement of defence department, armed forces, and in some cases parliament and other oversight actors
- Increased awareness of corruption risks, ethics and integrity
- Changes to and development of new procedures and systems for combating corruption
- Changes to procedures on procurement, and the acquisition or disposal of excess defence property
- Strong impact on national defence education and training
- Increased contribution to other BI and international efforts aimed at reducing the risk of corruption

and resources. Relations between government and civil society, as the aggregate of individuals, non-governmental organizations and institutions that are independent of government, are also likely to change slowly.

Overall, the results from the 2018 feedback survey are encouraging and highlight a wide range of positive changes in major outcomes such as high-level engagement, education and training, the establishment of new policies, procedures and permanent structures within the MOD, the establishment of action plans by most states, and contributions to other BI and international anti-corruption activities (listed in box 3.1).

Figure 3.2 demonstrates that significant progress has been made by participating countries in a number of areas. One possible reason for this is that the changes implemented to enhance integrity in earlier years may be having a continuing impact in helping to increase institutional awareness and promote further efforts to mitigate corruption risks, creating a virtuous cycle of anti-corruption and integrity initiatives. Another explanation might be that the areas of reform where progress has been made are the ‘easy’ steps. Additional countries making progress on easy reforms would result in more positive responses in these areas. Where countries are struggling with deeper reform, they have been failing to make significant changes in areas such as the application of lessons learned, procedures for designating sensitive positions and action plans, among other things.

A third possible explanation is linked to the formal endorsement of the NATO Building Integrity Policy at the Warsaw Summit in July 2016, which some observers regard as having led to a ‘positive shift’ in the influence of the programme within NATO. The establishment of a formal policy may have signalled that NATO is placing a higher priority on integrity, in turn prompting greater attention from members and partners. These possible explanations are not mutually exclusive. Future assessments should investigate the reform process, the theory of change in the arc of reforms—identifying the relatively easy reforms and those which present greater obstacles for the states participating in NATO BI—and the other factors that might explain positive change in preventing corruption.

4. Interview-based feedback on the impact of the SAQ/PRP process and efforts to mainstream NATO BI Policy

This section summarises the points raised in the interviews conducted with current and former defence officials, implementing partners, experts and civil society representatives. It addresses the key areas on which feedback was received, and provides general perspectives on the reform process and the relationship with NATO BI and the BI tools (SAQ/PRP, the compendium and the reference curriculum). It also identifies certain challenges facing NATO BI that were raised by respondents, such as sustaining momentum, politicization of participation in the programme by some state actors, reaching a wider range of institutions and actors, mainstreaming BI into NATO, communications and future development.

The one-to-one interviews with MOD representatives found that the programme has had a positive impact and most country representatives are very enthusiastic about it. Many of the findings from the interviews with defence officials validated the positive results in the survey. In some instances, however, staff turnover meant that certain participants were new to the programme and therefore lacked knowledge of previous stages of implementation. In other cases former officials were unable to speak to more recent developments.

Many respondents spoke of the positive impact that the SAQ and PRP have had in getting the attention of defence officials and putting defence integrity on the agenda, resulting in the introduction of new legislation, structures or mechanisms for building integrity. For both member states and partners, it was acknowledged that the SAQ had raised awareness about corruption in the defence establishment, and conveyed the message that good anti-corruption policy is not only about law enforcement but also about prevention, ethics, integrity and good governance.

While every country reform process is unique, reform processes can benefit from a firm foundation built on sourcebooks and peer country experience and insights. Where defence organizations already have an active anti-corruption policy, the SAQ and the recommendations of the peer review team can provide useful leverage in building support for integrity mechanisms. According to respondents, addressing corruption did not begin as a high-level issue in many of the participating states. The NATO BI helped to make integrity a higher priority for governments and parliaments, and provided a common approach through its sequenced programme of assessment, peer review and action plans. The production of relevant, practical material, such as the compendium of best practices, the reference curriculum and the policy, was seen by numerous respondents as a very positive element of the programme.

Numerous respondents took note of and praised the publication *Building Integrity and Reducing Corruption in Defence: A Compendium of Best Practice*, which contains detailed chapters on a wide array of problem areas and how to approach them. The compendium was described by various respondents as ‘very well done’, useful and even ‘superb’, and was well received by parliamentarians and civil society organizations in various partner countries who described how it had ‘touched the lives of many people’ and had ‘sustained effects’. The original compendium, available in 14 languages, is easily accessible on the NATO BI website. Volume 2, which is being produced and published as separate stand-alone chapters, was keenly anticipated by several respondents, although they were less familiar with the new format or emerging content.

The BI Reference Curriculum was considered a useful tool for those who know little about defence integrity, although some respondents thought more could be done to

disseminate and promote its use by national military training institutions. In addition, those respondents who helped to plan and produce the reference curriculum valued the process by which it was produced. Two such respondents found the process of consultation and sharing of expertise with other experts to be a highly positive experience, and both regretted the absence of subsequent efforts by the NATO BI Programme to draw on the pool of experts involved in the project. This suggests that NATO BI's role in convening experts and practitioners involved in integrity efforts is a valued and useful function that is at times underutilized.

Serious reform takes time and it is relatively easy to send signals that reform is under way. For institutional change to take hold, however, reform must be both consistent and persistent. This could explain why there has been less progress with the 'deeper' reforms, such as changes in procedures related to designating sensitive positions and the development of an action plan. One respondent identified the challenge of sustaining momentum in implementing integrity measures over time after the initial flurry of activity has subsided. Another respondent noted that NATO BI's success in engaging in conversations with defence ministries about corruption does not necessarily translate into real reform. Without transparency, such as through publication of the SAQ and the PRP, it is difficult to make an informed judgment about whether real reform has been implemented and has reduced the risk of corruption. A related concern raised by several national representatives was the issue of political will and its importance in sustaining the programme following a change of government.

An unintended side-effect described by several respondents was the tendency for some states to use interactions with NATO BI and appearances at NATO BI conferences as a facade to appear engaged in building integrity while concealing a lack of genuine commitment to integrity reforms. Non-governmental respondents from one partner country noted 'democratic backsliding' in their country, with the defence ministry on the surface appearing to support initiatives on building integrity, attending high-profile BI events and publishing defence integrity plans, but not following through with implementation of most of the integrity measures and mechanisms while in practice pushing for legislative changes to reduce transparency and limit access to information in the military and security domain. Nonetheless, several observers maintained that even in countries where backsliding can be observed, it is important for NATO to remain engaged with defence ministries through the BI Programme to avoid isolating those ministries and to enable awareness-raising activities to continue. In addition, the assessments of NGOs on these issues may suffer from many of the same attribution and measurement issues identified above. More transparency on reform and objective indicators of progress would serve both governmental and non-governmental actors in assessing reform.

Several respondents noted that the effectiveness of the SAQ and the PRP depended in part on the involvement of suitable peer reviewers with appropriate expertise, able to respond to specific problem areas identified by the SAQ. Four respondents—including two former members of peer review teams—highlighted examples where peer review teams did not have an adequate mix of country and thematic expertise on the type of defence integrity-related challenges facing the country as identified in the SAQ. Language was also flagged as a problem, where a peer review team lacked local language capacities and the interpretation or translation services provided were inadequate.

While implementing the SAQ and the PRP raises awareness in the defence ministry, another respondent noted the importance of developing a national integrity action plan to carry out the recommendations.

There was a consensus among several implementers and others that a major value of the NATO BI Programme is its ability to engage the defence ministries of various member and partner states in conversations about corruption risks. Several respondents, including non-governmental respondents, observed that defence ministries tend to be more comfortable speaking to NATO about defence corruption risks than to civil society organizations, and there was also a perception that institution-to-institution and peer-to-peer dialogue brought an element of stability and confidence to discussions around integrity.

Nonetheless, several interlocutors suggested increasing outreach to other experts beyond defence ministries. While NATO BI is perceived as having worked primarily with national governments, particularly defence ministries and the armed forces, independent state oversight institutions in various partner states are also seen as effective potential partners for NATO BI, and wider outreach by NATO BI would enable a 'broadening of the pool' of integrity expertise in a country. Engagement with parliamentarians could also be increased. Furthermore, all four respondents from independent civil society organizations described the programme as having minimal engagement with civil society and shared the view that more substantive involvement of civil society would build an important source of knowledge and capacity on defence integrity building in participating states.

The development of BI as a NATO 'discipline' since 2012 was acknowledged as a significant step forward. As one of 29 disciplines, BI is included in the regular machinery of all NATO education and training institutions, such as NATO School Oberammergau. A key future challenge identified by respondents will be to further mainstream building integrity into national educational institutes so that it is not seen as mainly the work and responsibility of a single team at NATO HQ, but becomes an integral part of NATO planning and activities, including in its military operations.

Various respondents from participating states, implementing partners and non-governmental organizations, as well as the contributor to the BI Trust Fund, felt that more NATO member states should undertake the SAQ and PRP because defence integrity is also relevant to them. NATO should avoid sending the message to partners and others: 'do as we say not as we do'. NATO BI should encourage more member states to participate in the BI Programme to further facilitate the diffusion of integrity norms and mechanisms.

For some respondents, engaging with the armed forces of NATO's largest member states was perceived as particularly important for mainstreaming BI within NATO and into its international operations. While the reference curriculum was viewed as a good step, some acknowledged that the challenge remains to ensure that national military training institutions implement it. Given the heightened awareness arising from experiences of corruption in the context of military missions in Afghanistan and Iraq, and that they are the main contributors to international operations, some felt it particularly important that the military institutions of the leading NATO member states receive pre-deployment training in recognizing and mitigating corruption risks on mission, and avoiding inadvertently contributing to corruption in the host country. Not all the interviewees made these points, but the question on NATO member state training for military operations was not asked of all participants. This could be an area for future exploration.

In addition to the institutionalization of defence integrity within NATO and in its member and partner states, some respondents identified the challenge of ensuring that the content of defence integrity programming and tools responds to the needs of participant states and maintains high quality standards. Some respondents

suggested updating existing tools and improving dissemination and outreach by the BI Programme.

Finally, some respondents recommended a further expansion of NATO BI's work into new areas. Some respondents from participating states supported the extension of the NATO BI SAQ into relevant Ministry of Interior activities, such as procurement. Ukraine is already demonstrating the relevance of NATO BI beyond the defence sphere through the participation of its border service, National Guard and security services. Another suggested area in which NATO BI could engage more in future is countering corruption in defence companies—a problem that confronts several NATO member states and partners, some of which encounter corruption in state-owned enterprises. This is an area where NATO BI has made some preliminary steps and contacts but, in the view of one subject matter expert, would need to develop specialized expertise in order to go further.

NATO BI is also developing the growing pains of a successful programme— as it grows and takes on more participants and activities, it will require effective systems and the procedures to communicate them to all interested parties. Several respondents commented on feeling insufficiently informed about the programme and upcoming events and activities, and expressed a wish for more regular and direct communication from NATO BI. Similarly, several respondents spoke of the advantages of keeping track of and remaining in contact with those who have been involved in developing content and tools, and delivering training. Several respondents mentioned how improved communication and coordination by NATO BI would be welcome, especially when engaging with new participating states, in which bilateral assistance and parallel efforts to support institutional and governance reform may be ongoing.

5. Overall results

The combined results from the 14 interviews and 17 survey responses demonstrate positive change supported by the BI Programme. More specifically, the NATO BI SAQ /PRP has had a big impact on outcomes such as: (a) senior level engagement; (b) changes in anti-corruption policies and procedures; (c) national defence education and training; (d) the establishment of permanent structures and coordination mechanisms to promote good practice; (e) the development of action plans and recommendations; and (f) contributions to other BI and international activities on combating corruption. Moreover, these results show improvement on the results of the 2014 feedback survey, which indicates that there have been positive medium- and long-term policy impacts from the programme.

Based on the survey results and interview responses, NATO BI is largely achieving its objective of providing tailored support to members, partners and other states that seek to reduce the risk of corruption in their defence sectors and to strengthen the understanding and practice of good governance in their defence establishments. Participating states, implementing partners and civil society actors agree that NATO BI's engagement with defence ministries on defence integrity is important and necessary.

Respondents would like to see NATO BI: (a) produce more content and refine its tools; (b) conduct more activities, such as training; (c) communicate its work and achievements more effectively; (d) engage more systematically with a broader set of actors within participating states and externally; and (e) play a more active role in creating a community of practice. They also want to see NATO BI's work picked up more by NATO member states, including in related training, exercises and operations. These views emerged from a cross-section of the BI Programme's stakeholders, which indicates broad support for its continued development. These responses also suggest a need to increase the capacity and possibly also the resourcing of the BI Programme.

6. Recommendations on further strengthening the NATO BI Programme for 2018–20

As the NATO BI Programme moves into its next phase, it should seek to refine its existing tools and develop more content:

- While the SAQ was seen as a good entry-level tool for states looking to build integrity in defence, NATO BI should develop a more advanced defence corruption risk assessment tool involving different methodologies and mitigation measures for countries with more developed anti-corruption systems or that have introduced reforms based on the initial SAQ and PRP.
- NATO BI should debrief peer review teams on a systematic basis to gather lessons learned and generate knowledge that can be used to improve the methodologies of the SAQ and the PRP.
- NATO BI should consider ways to sustain momentum in states' implementation of integrity measures to counter the idea that building integrity is a one-off activity.
- To facilitate uptake of integrity training, NATO BI should increase its outreach to national militaries, and consider the use of experienced trainers to develop modules drawn from the reference curriculum that could be integrated into pre-existing basic and pre-deployment training programmes.

Given that defence and security integrity is a highly specialized area of expertise, NATO BI should seek to build up a **network of experts and practitioners** on which it can call for advice in the development and refinement of tools and to participate in programme activities:

- Through the development of its tools and activities, NATO BI is well placed to play a role in convening defence integrity experts from governments, defence ministries, the armed forces, training and capacity-building institutes, and civil society and academia. With a more systematic approach to communications (see below), this convening role could contribute to the development of a networked community of practice.
- Where relevant country or thematic expertise in the peer review team appears to be either lacking or absent, additional expert capacity should be brought in by NATO BI. A network of experts would facilitate the identification of appropriate individuals for each peer review team.
- NATO BI should better capture the knowledge generated through the practical implementation of its integrity tools. For example, follow-on discussions with the development groups involved in the production of the curriculum and compendium could incorporate feedback from practitioners based on their use and implementation of the BI tools, in order to adapt and improve the tools, and sustain the involvement of experts who are interested in continued engagement with the BI Programme.

- NATO BI should continue to collect lessons learned on integrity from recent operations in Afghanistan and other contexts, and to identify individuals with expertise on integrity in international operations or procurement, who can be used in training, education and the development of relevant policy and doctrine.
- NATO BI should consider broadening its sphere of engagement beyond ministry of defence officials to engage with parliamentary oversight committees and those entities that specifically investigate and target corruption, such as military justice and anti-corruption bodies, the military police and prosecutors. Building a deeper understanding of the broader institutional infrastructure relating to integrity will better serve the programme and its participating states.
- NATO BI should consider the long-term value of raising awareness and reaching out to those who will be the next generation of defence ministers and military leaders, their deputies and staff, as well as their future scrutineers in government and civil society.

Mainstream building integrity within NATO and its member states:

- As the NATO Building Integrity Programme moves forward, more coordination is needed with the parallel NATO programmes on defence institution building, such as the professional development programme, in order to achieve better integration and greater coherence.
- NATO BI should seek to engage more directly with the national military training establishments of NATO's largest member states and to promote the development of integrity training courses, including in the context of international operations to which they are the main contributors.

As a programme like NATO BI matures and grows, it must become institutionalized and replace interpersonal communication with **systematic communication** if it is to succeed in coordinating a large network at scale:

- Regular, direct outreach to stakeholders about the programme should supplement communication through national delegations, where bottlenecks in the dissemination of NATO BI information can occur.
- When engaging with new states to build capacity in defence and security integrity, NATO BI should continue to communicate with its existing member states and partners in order to optimize opportunities for coordination with parallel bilateral efforts, avoid duplication and take a more 'joined-up' approach.
- Only a limited number of peer review reports and BI action plans have been made publicly available. NATO BI should encourage all participating states to make their reports and plans publicly available in order to better serve public accountability and good governance in the defence and security sector through greater transparency.

As NATO BI develops, it should give more thought to identifying progress indicators and **systematic measurement** of its achievements:

- NATO BI and its implementing partners should regularly monitor and evaluate the impact of integrity training courses. This could be achieved by implementing surveys of trainers and trainees before and

after the training, but also by comparing indicators for participants and non-participants (a comparison group). This would enable rigorous assessment of impact. The surveys could include questions on the self-reported state of corruption and the effectiveness of the training in changing perceptions and behaviour. Such surveys might, in addition to qualitative surveys, help to quantify and track indicators through time and across groups.

- NATO BI should develop the means for monitoring implementation of the recommendations that emerge from the peer review process. For example, on each anniversary of a SAQ and PRP having been completed, NATO BI should consider asking the participating state for an update on the impact of its recommendations or arranging for a follow-up peer review visit. This could be developed along the lines of the Council of Europe's Group of States Against Corruption (GRECO) process, with the possibility of successive rounds of assessment.
- NATO BI could consider comparing participating states' self-perceptions of the impact of the SAQ/PRP with objective measures of governance, integrity and transparency to demonstrate whether the self-perceptions of impact and change are supported. Many such indicators are now available, such as the World Bank's Worldwide Governance Indicators or Transparency International's Government Defence Anti-Corruption Index. This could also be an opportunity to involve more civil society experts and organizations in defence integrity building through regular monitoring. Where objective measures are not available, comparisons could be made between the stated objectives in action plans or other BI-related planning documents and actual outcomes.
- Based on the comments of several respondents, a review of the NATO BI Trust Fund is recommended, perhaps as part of the next planned BI Programme evaluation.

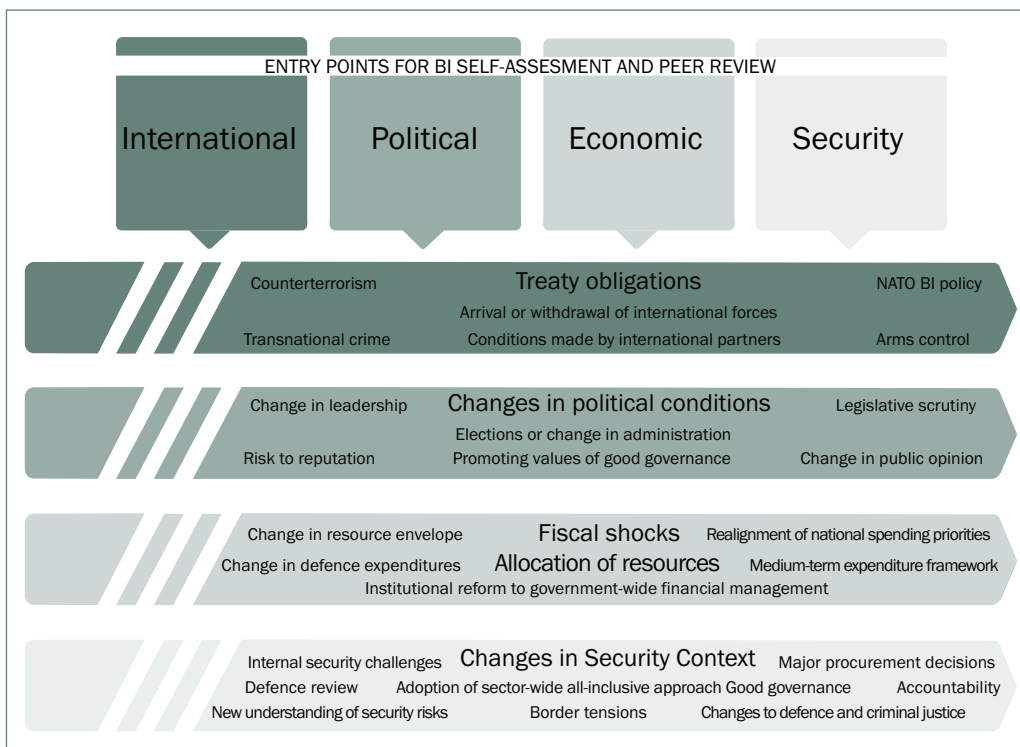
Appendices

Appendix A. Building Integrity log-frame

Appendix B. Interview script

Appendix C. 2018 feedback survey results

Appendix A. Building Integrity log-frame



Source: NATO Building Integrity Team's conceptualization.

Appendix B. Interview script

1. What are your general experiences of implementation of the BI Programme in your country?
2. How has your country implemented the SAQ and PRP?
3. Who has responsibility for implementing the BI measures? Who are the main stakeholders? What happens when officials responsible for implementing BI measures are reassigned or replaced? That is, is BI institutionalized in the organization, is it able to sustain changes in personnel?
4. How is the programme being implemented today?
5. How many times has the SAQ and PRP cycle been implemented by your country? (if the country became a NATO member after the first SAQ and PRP, what happened subsequently in terms of the SA and BI measures? To what extent is the SAQ/PRP seen as a one-off rather than iterative process?)
6. How have different stakeholders been engaged in the BI process?
7. What were the expected outcomes of participation in the BI Programme in the short (1 year), medium and long term?
8. Has the BI process been successful in your view? Please rank its success on a scale of 1 to 10 (10 being most successful).

9. Did the programme contribute to changes, can you give an example of a change to strengthen transparency, accountability and integrity in the defence sector?
10. Please describe positive changes in policies and in practices in the following fields:
 - Democratic control and engagement
 - State anti-corruption laws and policies
 - Anti-corruption policy in defence and security
 - Personnel, education, and training
 - Planning and budget
 - Operations
 - Procurement
 - Engagement with defence companies and suppliers
11. Did any negative changes occur as a result of the SAQ and PRP? Please describe.
12. What were the particular features of the SAQ and PRP that contributed to success, or affected its effectiveness?
13. Were there any unintended outcomes, positive or negative, of the SAQ and PRP?
14. In your view, what would make the programme more successful?
15. What were the main lessons learned from implementing the SAQ and PRP?
16. Are there plans to build capacity in defence integrity? If so, at what levels are these plans focused?
17. Based on survey response, more specific information will be requested from respondents about new procedures, mechanisms or systems that have been introduced as a result of the SAQ/PRP.
18. Can you think of an instance when corruption was prevented because of the BI tools? Can you think of a situation when they were not used but you wish they had been applied?
19. Is there anything else that you think is relevant but has not been addressed in this interview regarding defence integrity?

Appendix C. 2018 feedback survey results

Questions	Afghanistan	Armenia	Bosnia and Herzegovina	Bulgaria	Colombia	Croatia	Georgia	Hungary	Latvia	FYROM
Senior level engagement	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Raise awareness	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Changes in national legislation	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes/No
Changes in government policies	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
New procedures/systems	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Appointment of BI POC	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Establishment of a permanent structure	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Additional E&T identified	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
New E&T courses/programmes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
Changes in procedures for sensitive positions	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	Yes
Changes in HR management policies	Yes	Yes	Yes	Yes	Yes	No	Yes	—	No	Yes
Contribution to other BI activities	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Revision of captured lessons learned	No	No	Yes	Yes	Yes	Yes	No	No	No	Yes
Application of lessons learned	No	No	Yes	Yes	Yes	Yes	Yes	No	No	Yes
Consider changes to procurement or disposal of assets	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes
Business practices	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No
Changes in relations with civil society	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No
Development of Action Plan	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes

— = no response given; FYROM = former Yugoslav Republic of Macedonia; N/A = not applicable; NWC = not within competence.

Questions	Moldova	Montenegro	Norway	Poland	Serbia	Ukraine (SBGSU)	Ukraine (NGU)	Ukraine (SSU)	United Kingdom	Total
Senior level engagement	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	18
Raise awareness	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	18
Changes in national legislation	Yes	Yes	No	Yes	No	No	NWC	Yes	No	11
Changes in government policies	Yes	Yes	Yes	Yes	Yes	Yes	NWC	No	No	14
New procedures/systems	Yes	Yes	Yes	Yes	No	Yes	Yes	No	No	16
Appointment of BI POC	Yes	Yes	Yes	No	Yes	Yes	NWC	No	Yes	16
Establishment of a permanent structure	Yes	Yes	Yes	Yes	No	Yes	NWC	No	Yes	16
Additional E&T identified	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	18
New E&T courses/ programmes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	No	15
Changes in procedures for sensitive positions	Yes	No	No	No	No	No	Yes	No	No	9
Changes in HR management policies	Yes	Yes	Yes	No	No	Yes	Yes	No	No	12
Contribution to other BI activities	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	17
Revision of captured lessons learned	Yes	Yes	No	Yes	No	Yes	NWC	No	No	9
Application of lessons learned	Yes	Yes	No	No	No	Yes	NWC	No	Yes	10
Consider changes to procurement or disposal of assets	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No	14
Business practices	N/A	Yes	Yes	No	Yes	Yes	NWC	Yes	No	12
Changes in relations with civil society	Yes	Yes	No	No	Yes	Yes	Yes	No	No	12
Development of Action Plan	Yes	Yes	No	No	Yes	NWC	NWC	Yes	No	12

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