



CBC- BAAC Annual Report 2010

1. Programme Identification Details

GTF Number	GTF 272
Short Title of Programme	BAAC
Name of Lead Institution	Commonwealth Business Council
Start date¹	08/08/2008
End date:	31/03/2013
Amount of DFID Funding:	£2,798,626
Brief Summary of Programme:	<p>Locations: Up to 10 African countries including Botswana, Cameroon, Ghana, DRC, Lesotho, Malawi, Nigeria, South Africa, Tanzania and Zambia</p> <p>Key Words: Corruption; good governance; corporate governance; public Financial Management</p> <p>The CBC's project is a public-private initiative aimed at tackling corruption and supporting growth and improved services for 200 million citizens. Each of the national programmes will set up consultative working structures to implement nationally defined strategies especially improving public services, business climate, and standards of leadership behaviour. It will develop continental governance norms and implementation mechanisms, and strengthen capacity.</p> <p>The key outputs will be (i) 10-12 joint public-private national anti-corruption programmes; (ii) the development of continental standards in cooperation with regional/continental structures such as SADC and African Peer Review Mechanism and; (iii) capacity building, communication and advocacy using civil society and the media.</p>
List all countries where activities have taken or will take place	Botswana, Cameroon, DRC, Ghana, Lesotho, Malawi, Nigeria, South Africa, Tanzania and Zambia
List all implementing partners in each country	<p>The African Institute for Corporate Citizenship (AICC) 1st floor, 9 St. David's Place, Park town Johannesburg, South Africa</p> <p>BAAC Malawi Paul Kagame Road, Amina House, Ground Floor Private Bag 382, Lilongwe, Malawi</p> <p>The Human Rights Trust of Southern African</p>

¹ Date your grant agreement was signed.

	<p>(SAHRIT), 12 Ceres Road, Avondale, Harare, Zimbabwe.</p> <p>The Southern African Forum Against Corruption (SAFAC) c/o The Human Rights Trust of Southern Africa (SAHRIT), 12 Ceres Road, Avondale, Harare, Zimbabwe Contact</p> <p>The Convention on Business Integrity (CBI) 5th Floor, SIO Towers, 25 Boyle Street, Onikan, Lagos, Nigeria</p> <p>West Africa Business Association (WABA) Cameroon BP 94, Yaounde, Cameroon</p> <p>Ghana Anti-Corruption Coalition Pig Farm Junction (Main Olusegun Obasanjo Way) PO Box GP 17921, Accra, Ghana</p> <p>Directorate on Corruption and Economic Crime P/Bag 00344, Gaborone, Botswana</p> <p>Anti-Corruption Commission, Zambia</p>
Target groups- wider beneficiaries	The scope of BAAC is Pan-African and aims to identify and implement “winnable reforms” in 10-12 African countries to help support growth and improved services for up to 200 million of the continent’s most vulnerable citizens.
Lead Contact	<p>Steve Godfrey Managing Director Commonwealth Business Council 18 Pall Mall, London, SW1Y5LU Tel: 02070248200 Email: steve@sgts.co.uk</p>
Person who prepared this report (if different from Lead Contact)	<p>Sunayna Sethi Programme Manager Commonwealth Business Council 18 Pall Mall, London, SW1Y5LU Tel: 02070248219 Email: sunayna.sethi@cbcglobal.org</p>

2. List of Acronyms

ACRONYM	DESCRIPTION
AICC	African Institute of Corporate Citizenship
APRM	Africa Peer Review Mechanism
BAAC	Business Action Against Corruption
BOCCIM	Botswana Chamber of Industry and Manpower
CBC	Commonwealth Business Council

ACRONYM	DESCRIPTION
CBI	The Convention on Business Integrity
DCEC	Directorate on Crime and Economic Corruption, Botswana
DFID	Department for International Development, UK
GACC	Ghana Anti-Corruption Coalition
GPAC	Global Programme Against Corruption
HURIDETSA	Human Rights and Development Trust of Southern African
NEPAD	New Partnership for Africa's Development
SADC	Southern Africa's Development Community
SAFAC	Southern African Forum Against Corruption
SMMEs	Small, Medium and Micro Enterprises
SMEs	Small and Medium Enterprises
SOEs	State-owned Enterprises
WABA	West Africa Business Association

3. Executive Summary (max. 2 pages)

Good progress has been made over the past year, with new country chapters started. Following are the highlights/issues

Nigeria:

In the period under review, BAAC has worked to support strengthened accountability framework and practices in Nigeria including:

(a) More capable, accountable and transparent public service

Progress was made on the piloting of specific approaches of projects holding governments accountable leading to the identification of replicable models in the 12 months ended June 30, 2010. This approach was initially described as an Ombudsman System but after extensive research it was changed to an independent public feedback mechanism (incorporating complaints and whistle blower handling features) utilizing a text messaging system operated in cooperation with the official government Ombudsman. In the last 12 months the Public Complaints Commission has agreed to partner with the BAAC project to make this a reality.

Once successfully piloted in Nigeria, the intention is to replicate this system in Ghana, Kenya and South Africa as models of governance infrastructure needed to better hold governments accountable in Africa.

(b) Improved corporate governance standards in public and private sector

To improve corporate governance standards in Nigeria, BAAC took the approach of working with the UNODC and about 30 other organizations including business membership organizations. The goal of the working group was to identify ways of improving ethics and transparency in business transactions in Nigeria. The rating system developed by the Convention on Business Integrity was reviewed by a cross section of its signatories and a new incentive scheme agreed for implementation later in 2010 to identify and reward compliant companies. In addition, a training programme for directors of listed companies was developed in conjunction with the Governor of the Central Bank of Nigeria (CBN) and the Director General of the Securities Exchange Commission (SEC) and provided to 75 Directors in May. This session which was attended by the Governor and the Director General also set out recommendations for corporate governance reform. The Nigeria exercise is being evaluated as a model for replication in other countries.

(c) Improved conditions for doing business

As a baseline for the BAAC intervention through the creation of an independent public feedback mechanism, a set of reporting templates have been provided to the Public Complaints

Commission by BAAC Nigeria which it has adopted and its formations across the 36 states in Nigeria are beginning to put the required information together. The aim is to sensitise the public to some of the successes it has achieved by providing verifiable evidence on many dimensions and assisting it with public enrolment and engagement strategies ahead of the launching of the public launching of our cooperative project.

South Africa:

Our South Africa programme has developed well with AICC engaging different stakeholders Department of Public Service and Administration (DPSA), the National Business Initiative (NBI) (focal point for the Global Compact Learning Network in SA), Business Unity South Africa (BUSA), UNISA, The Institute for Security Studies (ISS) Ethics SA and the Institute of Directors (IoD). It has established a formal partnership with BUSA whereby BUSA provides convening prowess while AICC provides research and policy analysis support.

AICC is also part of the Public Sector Governance Committee for South Africa, which is hosted at the IoD as a secretariat and chaired by PWC and involves participation of key SOEs, National Treasury, and the Accounting Bodies in SA. The forum provides thought leadership in the area of governance and has been working on two key position papers (a) the interface of the Public Finance Management Act (PFMA) and the new Companies Bill; and (b) the governance of SOEs regarding the interface of key actors such as senior management, the Board, and the shareholder (through the supervising minister, parliament, President and department for public enterprises) to ensure accountability and transparency, responsibility, discipline and independence.

AICC supported BUSA in the convening of the SA Anti-corruption Business Forum, which was held on 30 October 2009. The meeting was attended by about 300 leaders from business, government and civil society. The aim of the meeting was to (a) information sharing on corruption and bribery in the business sector; (b) review of anti-corruption mechanisms in South Africa and their efficiency (c) monitoring progress on the implementation of the National Anti-corruption program as it relates to business.

DRC:

AICC organized and facilitated an international workshop on anti-corruption for private sector in the DRC in partnership with the Responsible Business Investment (RBI). The objective of the initiative was to promote responsible business investments and to showcase good internal practice and collective action in the DRC.

From the outcomes of the workshop on anti corruption, participating companies committed to good governance and transparency. This workshop has enabled setting up of a permanent secretariat of the RBI in Kinshasa-DRC, institutionalising the RBI in the DRC and the development of a Code of Ethics and a Code of the fight against corruption for the private sector members of RBI-DRC.

Ethics SA and AICC are collaborating in providing training on good governance, ethics standards and anti corruption in 2010, within few private companies' members of RBI in the DRC. This culminated in a round table dialogue in Ethics Management and Anti-corruption that was held in 30 March in Kinshasa, which was attended by 30 participants mainly from the private and public sectors.

HURIDETSA in collaboration with other partners is implementing the BAAC initiative in Zambia, Botswana, Tanzania and Lesotho. Various consultative meetings were held in Botswana, Zambia and Tanzania involving the private sector, anti-corruption agencies, and professional associations. These consultations were held in the period between December 2008 and June 2009, in each of the three countries.

In **Botswana**, The Botswana Confederation of Commerce, Industry and Manpower (BOCCIM) working together with The Directorate on Corruption and Economic Crimes (DCEC) have managed to develop Codes of Conduct dealing with disclosures of interest. These are at the finalization stage. HURIDETSA hopes that both private and public sector bodies will sign up to these codes of conduct once they are finalised and BAAC is launched in Botswana. There is also wide consensus among public and private sector bodies in Botswana that a Ratings Framework in the form of a standardized corruption rating tool be developed and put in place so as to monitor compliance to the codes once they are adopted.

In **Zambia**, the two consultative meetings and the one-on-one meetings with the private and public sector players revealed huge interest and positive reception to the BAAC initiative. The BAAC presents a more systematic and coordinated approach between the private and public sectors in combating corruption in Zambia. Stakeholders and HURIDETSA partners in Zambia such as the Zambia Business Forum (ZBF) have been sensitising their membership on the BAAC initiative thereby creating the much needed buy-in to the initiative. The official launch of the BAAC national chapter for Zambia on the 8th of April 2010, has given fresh impetus to the fight against corruption in Zambia with both the private and public sectors pledging to participate fully in the fight against corruption.

Tanzania has recently come on board and support for the initiative is very high among the private and public sectors in the country. The two consultative meetings held in Tanzania bore tangible results in the form of working steering committee which will coordinate and push for the formal launch of the BAAC in Tanzania. There is consensus within the private sector that The BAAC initiative is an important vehicle which can be used in the implementation of Goal 4 of the National Anti-Corruption Strategy and Action Plan (Phase II).

Lesotho: As a way of kick-starting the BAAC initiative in Lesotho, HURIDETSA will be holding a consultative meeting with key representatives of both the private and public sector in Lesotho. The purpose of the meeting is to discuss and develop consensus on the possibility of the establishment of a BAAC national chapter in Lesotho; develop consensus on the way forward in respect of the developed codes of conduct (especially for the private sector). The meeting will also explore the existing anti-corruption programmes of government and the business sector in Lesotho, with a view to informing a process for the establishment of a BAAC chapter.

The Government of Lesotho and BAAC are together organizing a Pan-African Anti-Corruption forum titled BAAC: Public Private Strategies to Improve Governance on the 17-18 November 2010. The forum will build on best practice and share experience on successful efforts by African government and the business community to tackle corruption and improve economic and corporate governance. This meeting will advance the Benchmarking Project (see below)

Ghana:

To ensure and promote consistent monitoring of anti-corruption strategies by all stakeholders, the Ghana Anti-Corruption Coalition (GACC) and the BAAC organized a workshop on February 8, 2010 as part of the 2010 Africa Investment Forum to assess practical ways in which businesses, government, and civil society can work together to reduce corruption and improve corporate and overall governance.

The workshop provided a platform to strengthen ownership of strategies to be adopted by participants in tackling corruption; and initiate a network for businesses to work with other stakeholders in the fight against corruption.

Malawi:

The Business Symposium was a successful event reinforcing the commitment by Malawi's business community to combat corruption. At the same time, it strengthened the relationship between the BAAC, Malawi businesses and the Anti-Corruption Bureau. The aim of the Symposium was to unpack the National Anti-Corruption Strategy and to explain the implications this strategy will have for private business in Malawi. The event received considerable support by member companies and partner organizations such as GTZ. It attracted attention within the BAAC member companies and beyond in Malawi's business community.

BAAC Malawi also provides training for its member companies' workforces on Corporate Social Responsibility (CSR), Ethics and Anti-Corruption. To date, 27 officers from our member companies have participated in the one week training.

Cameroon:

The programme is focusing on improving the business environment by reducing day-to-day embezzlement which so frustrates the business world- tax inspectors, police, labour inspectors and the like. The Minister of Supreme State Control who has led the investigations leading to the arrest and trial of very senior civil servants is training inspectors to be available in all ten provinces. WABA Cameroon will be working to "coach and train" this new young breed of

compliance inspectors through a pilot series of training workshops, based on real cases and detailed case studies. This is a high priority for the Government.

Benchmarking Corruption:

One area of difficulty has been the Benchmarking Anti-corruption Initiative in Africa. This has been developed by AICC working in conjunction with the African Development Bank (AfDB) and an inaugural Technical Meeting was planned for Tunis in late 2009. Although AfDB and APRM officials were keen on this proceeding, the arrangements fell foul of the requirements for formal endorsement within the AfDB, a technical process which can take 1-2 years. To manage this, we have discussed the issue with the Government of Lesotho who has agreed to host a pan-African meeting in November 2010 in Lesotho. The Government will arrange for African governmental representation, including the AfDB; and BAAC will bring in the private sector.

Resources:

A significant number of reports and publications have been produced. The website www.baacafrika.org has been completely redesigned and will be live from September 2010. Significant investment has been made in fundraising for new resources to address sustainability. A competitive bid to Siemens for \$2m has been selected to go to proposal stage. If successful this will expand BAAC to Malaysia and India. The Doing Good Business in Africa- Report by Africa Progress Panel and Concern Universal cited BAAC as a best practice governance project which should be replicated.

Full progress reports are attached in Annex 7.

4. Programme Management

CBC acts as the convener of the BAAC Project Management Group and accounting officer for expenditure.

CBC has had a strong interface with its implementing partners through

- Quarterly Financial and narrative reports
- Quarterly BAAC Board Meetings
- Regular Teleconferencing

The Project Director is Prof. Steve Godfrey and Dr. Achim Engelhardt, International Consultant, Lotus M&E Group has been appointed as our M&E Consultant.

The Project Manager Sunayna Sethi, will be taking maternity leave on 1st September. We will in due course inform you of her replacement.

5. Working with implementing partners

The following table indicates the roles and responsibilities of new implementing partners within the BAAC Project.

Agency	Current Programme Responsibilities	Management/Functional Responsibilities	New Country Programmes
Ghana Anti-Corruption Coalition	Ghana National Programme	Hub Link to West Africa Hub Link to civil society SC Member	Ghana
Anti Corruption Commission, Lesotho*	Lesotho National Programme	Hub Link to SADC	Lesotho
Zambia Business Forum	Zambia National Programme	Hub Link to SADC	Zambia
Tanzania Private Sector Forum and the Prevention and Combating of Corruption Bureau	Tanzania National Programme	Hub Link to East Africa	Tanzania

*To be confirmed

6. Risk Assessment

The overall project design is considered robust, effective and applicable to the achievement of goal and purpose level outputs. However, the reduced value of sterling is a significant change affecting the value of the GTF investment but mitigated by raising funds from other sources. As noted above, we have submitted a 2nd proposal towards the Siemens Integrity Initiative which is included in the Annex 4.

Below are the risk assessment matrices for our new country chapters and for those countries where there has been a change in risk profile.

Malawi:

Internal Risks: The major challenge for the AICC, Malawi and the Business Action against Corruption in Malawi is to employ workforces with the particular capabilities required in this field. Experienced and qualified professionals are rare in Malawi. Therefore, salaries are relatively high for specialists. This remains to be a major risk for the future. AICC Malawi aims to address this issue in developing a young (Malawian) professional to take over the role of the current programme manager.

External Risks: The main problem is a potentially decline in interest in anti-corruption activities in both, the public and the private sector. Furthermore, the funding situation is an issue of ongoing consideration. Due to the financial crisis, many firms struggle in contributing their membership fees on time or at all. AICC Malawi intends to address this problem by developing an own training program which would help to generate income.

Nigeria:

Political Risks have risen as a result of the change of President due to the death of Yar Adua. These were not anticipated. General Elections come up in 2011 and only mitigation to the potential electoral violence would be to ensure we have free and fair elections. Mitigation, CBI in partnership with the Public Complaints Commission is working to ensure there is an independent public feedback mechanism set up before elections to use to heighten transparency of the polls and polling process.

South Africa and Congo DRC:

Project	Type of Risk	Risk	Likelihood (H/M/L)	Impact (H/M/L)	Management
South Africa National Chapter	External	Inability of BAAC to find niche in South Africa and thereby not being accepted by local stakeholders	M	H	Engagement with key stakeholders. Also partnership established with BUSA. BAAC's financial contribution to key SA projects also key
	External	Diffusion of BAAC strategy by virtue of having limited control of the agenda due to partnership approach	H	M	AICC implementation of BAAC in SA to look at innovative ways of supporting existing structures in line with BAAC's principles. Also,
DRC National Chapter	External	Inability to find credible local partner as anchor. As a post conflict country, it may be very difficult to find an institution that is not scarred by ethical and governance issues	M	H	BAAC to leverage from AICC and Ethics SA activities in DRC. Also to engage with FEC Congo (Federation of Congolese Enterprises) and part of intervention will be training on ethics and governance for FEC.
	External	Lack of political goodwill	H	M	BAAC to leverage from AICC and Ethics SA activities in DRC and look for innovative ways of gaining high level support for the project from government and business.
BAAC Online collaborative portal	Internal	Sub-standard content due to inability to employ editor/information farmer	M	M	AICC recruiting an editor/information farmer
	Internal	Disjoint uploading of content by partners	L	M	Training session for communication officers of partner organisations on joint strategy for maintaining on-line platform. Also regular telephonic and online engagement between partners
Benchmarking anti-corruption project	External	Lack of support from official African Institutions and thereby little uptake of project outcomes	H	H	Create political goodwill for the project through CBC Board. Important to engage leadership of AfDB, NEPAD APRM and UNECA Use offer of Government of Lesotho to host pan African meeting to deliver participation of key institutions

	External	Dissipation of the interest of stakeholders by time delays in getting the project running	M	L	Hold Technical Expert meeting ASAP and maintain regular communication
		Inability to successfully pilot the project due to lack of perceptive countries	L	H	Start getting buy in for the project from perceptive countries starting from countries where the political goodwill for BAAC already exists
General	Internal	Maintaining qualified employees / support to give project dept and sustain projects	M	H	<ul style="list-style-type: none"> - Ensure proper contracts and incentives are in place for existing resource people - Ensure appropriate support is also provided on a sustained basis
	Internal	AICC unable to implement BAAC effectively due to lack of financial Sustainability	M	H	<ul style="list-style-type: none"> - Strategic session planned - Fundraising strategy being considered - Bilateral engagement between CBC and AICC

Ghana:

Risk	Likelihood (H/M/L)	Impact (H/M/L)	Management
Private Sector sceptical about the effect on their organisations due to their links with political parties if they are seen to be openly working with Civil Society on corruption	H	H	Strong media advocacy and strong research into the involvement of Private Sector as a key stakeholder to benefit from a reduction in corruption in Ghana
Private Sector networks are very weak and do not have much control over its members	M	H	Strong research based advocacy on issues related to corruption
Issues related to the fight against corruption are politicised	H	H	Building stakeholder trust in processes and programs embarked upon.
Weak institutional capacity of anti-corruption institutions	H	H	Advocate for more political will to resource anticorruption institutions

There have not been any significant differences or change on the Risk Assessment Matrix over the last year for Botswana, Cameroon, Zambia and Tanzania.

7. M&E Arrangements

There has been no change in the M&E arrangement. The personnel, resources and activities set out in the Inception report remain the same.

8. Logframe Changes

No change in logframe. It is attached in Annex 2.

9. Emerging impact on governance and transparency

Programme Name:	BUSINESS ACTION AGAINST CORRUPTION (NIGERIA)
GTF programme logframe indicator to which this case study is contributing	4.4 Annual evidence of CSOs influencing Govt Policy decisions and strengthening the effectiveness of watchdog institutions Agreement of Codes of Conduct Framework at national levels
What is the evidence for the example given?	The finished business principles document together with its associated reporting guideline
What has changed?	Before the intervention, there was no clearly articulated set of business principles defined in broad consultation with business and other key stakeholders in Nigeria, today we have one.

Who has benefited?	All the 41 organizations in the working group that produced it and now we are preparing a roll-out phase to ensure the wider business community can benefit from it through signing up to the principles publicly and committing to making periodic reports using the reporting guidelines attached to it.
How the change occurred?	This was achieved by CBI discussing its workplan with the Nigeria Economic Summit Group (NESG) and the UNODC and identifying synergies and potential overlaps. This allowed a commitment towards collective action that brought government anti-corruption and regulatory agencies, Civil Society Organisations and Business Membership Organizations together in collective action aimed at defining activities that would improve ethics and transparency in business transactions in Nigeria. These 40 odd organizations were members of a working group led by the UNODC in the effort. CBI defined and conducted research to define the business principles, which were presented to the business community and regulators at the 15 th Nigeria Economic Summit, December 2009 in Abuja Nigeria. The principles, the process which identified them and the plans for popularising them were enthusiastically received by participants at the National conference.
Why this change is useful?	This change is strategic and timely as the voice and participation of business had been weak in processes that created codes of corporate governance for them. An opportunity presented itself in the recent reforms of the financial services sector and the resulting need to harmonize all codes of corporate governance targeted at the financial services sector and business now has a set of principles, which it wants to use as a framework with which to interrogate the contents of the code for adequacy. This intervention also provides an entry point to discuss the types of incentives and sanctions regimes that will be needed in order to improve voluntary compliance by business entities, which is needed for sustainable change.
Where has this change occurred?	The change has occurred in a small cross-section of the Nigeria business community with endorsement at a conference of a larger community and now poised for popularisation across a much broader cross-section of the Nigerian business community

Programme Name:	Business Action Against Corruption
GTF programme logframe indicator to which this case study is contributing	1.1 GTF targeted countries improve their annual ranking on selected governance indices
What is the evidence for the example given?	1.) Improved cooperation between the private and public sectors in development of strategies targeting corruption in Botswana, Zambia and Tanzania 2.) Ownership and sustainability of strategies developed to combat corruption.
What has changed?	In Botswana, Zambia and Tanzania, before the introduction of the BAAC initiative there was a multiplicity of business associations all involved in one way or another in combating corruption and improving transparency in doing business. The BAAC over the past year has brought and involved all the different players both in the private and public sector together in combating corruption. Most of the key stakeholders in Botswana, Zambia and Tanzania have expressed how the BAAC has provided them with a much more systematic and coordinated approach in improving governance and transparency in business. The uniqueness of the BAAC initiative in the above mentioned countries is its ability to bring together and to build synergies between the Private and Public Sectors and to a greater extent this is being achieved.
Apart from the above there has also been an improvement in the acceptance and ownership	

<p>of the BAAC initiative in Botswana and Zambia which has impacted positively for future sustainability of the project in both countries. In Zambia for example, the Zambia Business Forum(ZBF) and Botswana Confederation of Commerce, Industry and Manpower(BOCCIM)and the Directorate on Corruption and Economic Crimes (DCEC) have all incorporated BAAC activities into their work plans and budgets such that they become part and parcel of their day to day activities. This shows the degree of buy-in into the BAAC which impacts both on ownership and sustainability especially looking beyond the project cycle.</p>
<p>Who has benefited? The BAAC programme has been of benefit to both the public and private sectors in Botswana, Zambia and Tanzania. For the first time the two sectors now share a common vision, ideas, knowledge and information on fighting corruption. This has seen the reduction of duplication of efforts and strategies in combating corruption. In Botswana the Private sector through the BAAC has come together to develop generic codes of conduct specifically targeting the private sector. Key stakeholders particularly from the private sector contributed immensely in the development of these codes. This is essential as it also goes a long way in ensuring that these stakeholders sign onto the codes and ensure their effective implementation and enforcement.</p>
<p>How the change occurred? One of the key strategies that HURIDETSA employed in Botswana, Zambia and Tanzania to effect the above mention transformation was the use of consultative meetings and workshops bringing the private and public sector key representatives together. This multi-stakeholder approach, to a great extent, enabled and ensured buy-in and support to the BAAC initiative. One of the major challenges for the Private sector in almost all the three countries above was the lack of a platform to which they as the private sector could share ideas and strategise in combating corruption.</p>
<p>Why this change is useful? This change is useful in that the BAAC initiative presents a more systematic and coordinated approach between the private and public sectors in combating corruption in Botswana, Zambia and Tanzania</p>
<p>Where has this change occurred? It can be said that one of the major changes due to the BAAC occurred in perception especially regarding how Business can play a part in combating corruption. A lot of focus when it comes to corruption has been concentrated in the public sector; however, the BAAC in Botswana, Zambia, and Tanzania has shifted the focus and is showing that Business has a part to play in fighting corruption. Through the BAAC the Public and Private Sectors are no longer working in isolation. There is now a concerted effort by both sectors in developing strategies aimed at improving governance and transparency matters in the three countries that HURIDETSA is working in.</p>

10. Cross-cutting issues

Given the clear failure of corporate governance in Nigeria which became most apparent in the recent global and local crisis in the financial sector, the CBC along with its partners organised a Good Governance and Regulatory Leadership Forum on the 14-15 May in Abuja, Nigeria. The objective of the forum was to create the framework and provide the tools to enable regulators, directors and senior management of Nigerian entities to upgrade their standards and practices of corporate governance, ultimately to world class standards. The Forum gave the participants the opportunity to consider how to make a practical difference and improvements to the practice of corporate governance in Nigeria.

The forum was a huge success and we are planning a further Forum in Lagos on 14th-15th September 2010 aiming to train a further group of 100-120 Directors. We consider this to be a significant model for leadership change, training and regulatory reform of listed companies which is capable of replication in other countries. Detailed report is available in Annex 4.

Progress towards sustainability (year 2 onwards)

The sustainability of multisectoral programmes on governance is complex and has a number of separate dimensions:

- (a) The umbrella BAAC project
- (b) The national arrangements/campaigns and networks
- (c) The anti corruption arrangements

With respect to (a) a short term risk has been the devaluation of sterling. In one or two cases, where there has been both a sterling and dollar depreciation against the local currency, or high inflation, the effects have been serious, and will affect programme implementation scaling back of available funds.

We have recently entered a competitive bid through the Commonwealth Business Council under the Siemens Integrity Initiative, which is a global fund launched by Siemens, that support organizations and projects that fight corruption and fraud through collective action, education and training. From a bid list of 297, BAAC is among the 40 short listed applicants to proceed to the next phase of the selection process and submitted a full proposal last month. The proposal covers 4 countries- Nigeria, South Africa, India and Malaysia, thus giving us the opportunity to make BAAC global, which opens up new sources of support and investment. The decision on the bid will be made by September 2010. In 2011 we will be reviewing the possible other sources of finance which may be available from governments, foundations and the private sector itself to maintain support beyond the DFID funding.

National programmes as set out in the report face a number of challenges, including funding and retention of skilled staff. The medium term viability of national coalitions or collaborative partnerships requires that there be sufficient resources available within the collaborating partners themselves to maintain momentum. While this remains a challenge the fundamental sustainability sought is in the reforms, programmes and actions at level (c).

The projects seeks to hard wire these outcomes through legislative, regulatory and behavioural actions taken by government and companies, and back stop this by raising public or stakeholder expectations and demands for good governance. In this way, changes are sustainable.

11. Innovation

One of the most ambitious goals of the BAAC Malawi is to develop an innovative ratings framework on corporate anti-corruption efforts. The aim is to establish a tool which allows measuring a firm's activities to fight corrupt practices and to make the results comparable among the firms.

The problem with corruption issues is frequently that they can't be exactly determined. Many actions can be regarded and judged differently and so can be the various approaches of the firms. Developing a ratings framework therefore contributes to a better understanding of where a firm has its strengths and weaknesses. It also allows identification of champions in fighting corruption and getting an understanding of best practices in the field.

The increasing acceptance of these codes show that more business people feel committed in anti-corruption today.

These codes are currently work in progress in Malawi. Once completed at the end of this year, the aim is to replicate them in other African countries. We feel that these codes will be a powerful tool in fighting corruption.

CBi Nigeria has also developed an independent public feedback mechanism (incorporating complaints and whistle blower handling features) utilizing a text messaging system operated in cooperation with the official government Ombudsman. In the last 12 months the Public Complaints Commission has agreed to partner with the BAAC project to make this a reality. The design also calls for media involvement and T.V Channels have bought into the idea and agreed to be the

official media partner. The US Embassy, looking at our proposals to pilot it during the 2011 elections has offered to bring the international media on board.

Once successfully piloted in Nigeria, the intention is to replicate this system in Ghana, Kenya and South Africa as models of governance infrastructure needed to better hold governments accountable in Africa. For continuity of this aspect of the project and to roll it out to South Africa, application for funding has been made to the Siemens Integrity Initiative and the Center for International Private Enterprise (CIPE) to leverage the initial DFID investment.

12. Learning from GTF

In Nigeria, activities have been designed and implemented collaboratively with the supply side. We have been engaged in collective action as a philosophical position so we try to ensure we engage key stakeholders right from the start. We have demonstrated the added value of new tools and methods within our target group by supporting our position with detailed research. Early identification of allies, joint planning with them and not tarring all of government with one brush but taking pains to identify and isolate problems areas for criticism have been used to strengthen advocacy and engagement with our stakeholders.

We strongly believe in determining a clear understanding of the political structures, institutions and agents. These are used to identify the effort, alliances, approaches and strategies needed to achieve change. The innovation we have brought is to find creative ways of rekindling interest in a piece of the governance infrastructure, the government Ombudsman which was moribund. The role we have played can be attested to by the agency head and members of the project steering committee established at our instance. The public complaints commission is waking up to its responsibilities and have officially partnered with us to deliver improved services to the public.

With regards to the new approaches used for the reduction of corruption, we believe that the measure should be in the outcomes not the outputs we generate. Our work has not yielded the kind of change outcomes we seek. However we are satisfied we are hitting the right milestones leading towards the results we seek. However, the approaches that increase the use of the legal system to reduce corruption haven't been successful.

HURIDETSA through the BAAC has tried to feed as much as possible into programmes and activities that are already in existence in Botswana, Zambia and Tanzania without duplication. As such political leaders and stakeholders were convinced to appreciate the BAAC initiative not as a competing programme. This has enabled openness and participation by all including the politicians. For example in Tanzania the BAAC became a platform through which the GOAL 4 of the National Anti-Corruption Strategy will be implemented and involvement of the private sector enhanced. The national anti-corruption strategy is the guideline that government seeks to use to tackle corruption in Tanzania, using a multi-stakeholder approach.

In **Malawi**, BAAC Malawi organised a Business Symposium together with the Malawi Anti-Corruption Bureau which aimed at unpacking the National Anti-Corruption Strategy in Malawi. Delegates from the public sector and the private sector participated actively. We have demonstrated the added value of new tools and methods by publishing monthly newsletter and personal consultations with our member companies' managers. We are also currently developing a ratings-framework on anti-corruption efforts of organizations which should serve all parties to identify weaknesses in their organizations. We see the Business Symposium as a powerful instrument to regularly link representatives from the public and the private sector.

The codes of conduct are mandatory to sign for all our member companies. We also require the directors of each member company to sign a Commitment letter every year. The ratings framework which is currently developed by a working group is expected to be widely applied in the business community as it will be promoted by accountancies such as KPMG and Deloitte.

As regard the media tools, we haven't used them in our network as they are costly and time consuming. Given our limited resources we emphasize personal contacts on all levels and at all

useful opportunities. By this we expect immediate results directly in our target groups at relatively low costs.

One factor that has determined that civil society intervention has impacted governance and transparency in Malawi is the annual ranking of Malawi in the Transparency International CPI Ranking. It shows a steady improvement in Malawi coming down from rank 117 to 89 in last year's survey. We expect that our Ratings Framework will help to quantify the development in the private sector. The Ratings Framework will be finalized by the end of 2010 and will then be promoted and applied by KPMG and Deloitte.

With regards to innovative practice, we promote (and increasingly recognize) a shift from 'soft issues' such as awareness building to more 'hard hitting' instruments such as e.g. Whistle Blowing. Our next Business Symposium will deliberately address this issue. We also try to involve donor organizations in our collaborative approach as we recognize that their procedures sometimes unintentionally support / motivate corrupt practices.

Though it is hard to measure the success of intervention strategies, it seems that people in Malawi begin to openly discuss corruption issues. The perspective, that corrupt practices are to some degree understandable and permissible declines. We also see that certain leaders of public authorities (e.g. Roads Fund Administration, Malawi Revenue Authority) convincingly engage in combating corruption, thus helping our member companies in resolving dilemma situations.

Our program continuously raises awareness by means such as the newsletter, the Symposium etc. We don't see different understandings to be a major problem. Rather, these different understandings appear to be an excuse for those, who so far don't want to engage in the fight against corruption. However, the social reality of family orientation (extended families) as well as a strong dependence on seniority principles and an underdeveloped critical thinking attitude sometimes hinders individuals from engaging in anti-corruption. It is one of our main targets to show that corrupt practices in the long run undermine the good traditional values of Malawi.

Developments such as the code of conduct, whistle blowing and (in the near future) the Ratings Framework have an impact not only on professional practice but as well on the mindset of the people involved. The increasing acceptance of these instruments show that more business people feel committed in anti-corruption today.

The National Anti-Corruption Strategy (launched in 2009) is a major achievement in the increase use of the legal system to reduce corruption. The strategy, once put into legal practice will help to enforce anti-corruption means such as the code of conduct. Therefore, we anticipate a major impact of the legal system in the fight against corruption.

AICC's projects within the BAAC hinges on collective multi-stakeholder action to combat corruption, involving high level support from government, business and civil society and working with various stakeholders. Our methodology for engagement includes direct meetings and networking, advocacy, research reports, and facilitating multi-stakeholder forums.

We are developing the BAAC online collaboration. There are comparative advantages of collective multi-stakeholder action to combat corruption, involving high level support from government, business and civil society and working with various stakeholders. This usually involves looking for areas of synergies and leverage as well as creating win-win results for stakeholders.

The key factors that determine whether or not change in relation to governance and transparency is achieved are

- Level of incidence re corruption
- Number of coalitions promoting governance and transparency
- High level commitment to reform from captains of industry (business) and government leaders
- Integrity Initiatives at sectoral levels e.g. codes of conduct
- Empowered civil society

In our SA programme, we are part of the Public Sector Governance Committee which provides thought leadership in the area of the governance of public entities in the country. The Committee is innovatively structured and is comprised of multi stakeholders from business, government and civil society. Most influential strategy is collective multi-stakeholder action to combat corruption, involving high level support from government, business and civil society and working with various stakeholders. Certainly we can attribute significant social change to the GTF funded work, although still early days.

Our programme looks at governance and transparency in a holistic and integrated way thereby supporting key thematic areas e.g. corporate governance reform, ethics, public procurement, dealing with conflicts of interest etc

Annex 1 - Achievement Rating Scale:

- 1 = fully achieved, very few or no shortcomings
- 2 = largely achieved, despite a few short-comings
- 3 = only partially achieved, benefits and shortcomings finely balanced
- 4 = very limited achievement, extensive shortcomings
- 5 = not achieved

Please complete this template in summary form to provide a uniform assessment of progress against your stated objectives.

Objective Statement	Achievement Rating for year being assessed	Logframe Indicators	Baseline for Indicators	Progress against the Indicators	Comments on changes over the last year, including unintended impacts
<p>2. Purpose 2.Support strengthened accountability framework and practices including:</p> <p>2(a) More capable, accountable and transparent public service</p> <p>2(b) improved corporate governance standards in public and private sector</p> <p>2(c) improved conditions for</p>	3	<p>2.1 Strengthened Corporate governance regimes for public and private sector and improve business climate as expressed by:</p> <p>2.1 (a) - Demonstrable improvements in business regulatory environment in BAAC countries</p> <ul style="list-style-type: none"> - Quality of public administration in BAAC countries <p>2.1 (b) - Codes of Conduct for specific business sectors in BAAC countries</p> <p>2.1 (c) - Legal enforcement of intellectual property rights:</p> <ul style="list-style-type: none"> - Improvement of property rights and rule-based government in BAAC countries - Increase of foreign and domestic direct investment in 	See BAAC baseline data matrix	<i>Survey data for 2009 is expected to become available in late 2010</i>	Progress has been made specially in advancing codes (2.1(b))

doing business		<p>BAAC countries</p> <ul style="list-style-type: none"> - Business environment improving in terms of reliable justice in BAAC countries - Business environment improving in terms of tax policy in BAAC countries 			
<p>Outputs</p> <p>3. Support Establishment of 10-12 joint private-public national anticorruption programmes with defined strategies</p>	3	<p>3.1 Creation of BAAC structures and work plans</p> <ul style="list-style-type: none"> - Piloting of specific approaches of projects holding governments accountable leading to the identification of replicable models - Replication of at least 3 piloted models/approaches to hold government accountable in other African countries - Leverage of funding for replicated models/approaches 1:1 of initial DFID investment 	See BAAC baseline data matrix	See "activities related to output 3"	4 countries added to partnership- Ghana, DRC, Tanzania, Lesotho Non- DFID funding leveraged in Malawi, Nigeria, Lesotho
<p>4. Recognition of the need for action for benchmarking in corporate governance reforms – the African Peer Review Mechanism (APRM), adoption of Codes of Conduct and Company Rating System</p>	4	<p>4.1 Adoption of benchmarking criteria in APRM by 10 countries;</p> <p>4.2 Agreement of Guidelines for Company Ratings System; Company Ratings System applied in BAAC countries; Private sector companies including multinational companies and SMEs participating in Company Ratings System</p> <p>4.3 Agreement of Codes of Conduct Framework at national levels; Codes of Conduct applied and compliance reported on in BAAC countries;</p>	See BAAC baseline data matrix	See "activities related to output 4"	Institutional locus of project moved to joint initiative between project of Lesotho and BAAC.

<p>5. Enhanced capacity of civil society, media and oversight bodies to address corruption</p>	<p>4</p>	<p>5.1 Capacity-building via training, advocacy and information as shown by: - Cases of corruption being reported in national media (change from 2008 baseline and by relevant countries)</p> <p>Reporting of national media on corruption cases a) Prosecuted and; b) Charges enforced (all increasing from 2008 baseline in relevant countries)</p> <p>- Feedback from participants in training events: 70% satisfaction rate in average; examples of practical application of know-how</p> <p>5.2 Improved integrity of CSOs and; Improved integrity of the media</p>	<p>See BAAC baseline data matrix</p>	<p><i>See "activities related to output 5"</i></p>	<p><i>See "activities related to output 3"</i></p>
<p>Activities related to: Output 3: Support Establishment of 10-12 joint private-public national anticorruption programmes with defined strategies</p>	<p>3</p>	<p>Nigeria: Independent Public feedback mechanism set up in cooperation with the official ombudsman and Public Complaints Commission</p> <p>Malawi: Business Symposium organised in January 2010 which unpacked the National Anti-Corruption Strategy and explained the implications of the strategy. It reinforced the commitment by Malawi's</p>		<p><i>Malawi moved forward from rank 118 out of 180 countries in the Corruption Perception Index (Transparency International's annual released database)</i></p>	

	<p>business community to combat corruption.</p> <p>Zambia: Launch of Zambia chapter. 2 consultative meetings and the one-on-one meetings with the private and public sector players revealed huge interest and positive reception to the BAAC initiative</p> <p>Tanzania: 2 consultative meetings held to use the BAAC initiative as an important vehicle in the implementation of Goal 4 of the National Anti-Corruption Strategy and Action Plan (Phase II)</p> <p>Botswana: Finalizing the code of conduct dealing with disclosure of interest</p> <p>South Africa: Engaged different stakeholders to combat corruption. Convened SA Anti-corruption Business Forum with BUSA.</p> <p>DRC: International workshop organised on anti-corruption for private sector. The workshop established the set up of permanent secretariat and institutionalization of the RBI</p> <p>Ghana: Organised a workshop to strengthen ownership of strategies to be adopted by</p>		
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		participants in tackling corruption			
<p>Output 4:</p> <p>Recognition of the need for action for benchmarking in corporate governance reforms – the African Peer Review Mechanism (APRM), adoption of Codes of Conduct and Company Rating System</p>	4	<p>Malawi: Working group formed to develop a ratings framework on corporate anti-corruption efforts</p> <p>Nigeria: Irreducible Business Principles identified to improve ethics and transparency in business transactions in Nigeria</p> <p>Integrity Rating System: Agreement of Guidelines for Ratings System in Nigeria, Ghana & Senegal CBI ratings/ certifications scheme adopted as model by WBI and included in standards shared with African countries participating in their collective action programmes.</p> <p>Botswana: Completed codes of conduct dealing with disclosures of interest in Botswana for both the public and private sector.</p> <p>APRM: Developed the concept documents and terms of reference for the project with log frames. The technical meeting scheduled for early 2011.</p>		<p>Codes of conduct spread from Malawi to Zambia and Tanzania, with two BAAC projects working together; codes of conduct developed in Botswana. Business Principles established in Nigeria.</p>	<p><i>Building on BAAC Malawi's solid progress achieved with Codes of Conduct, the work has been replicated in three new BAAC countries: Botswana, Tanzania and Zambia. The codes of conduct will be used in Lesotho as well.</i></p>
Output 5:	4	Nigeria: Collaboration with the World Bank Institute and the UN		Capacity building started in Malawi and Nigeria;	

<p>Enhanced capacity of civil society, media and oversight bodies to address corruption</p>		<p>Global Compact Local Network in Nigeria</p> <p>Nigeria: Set of reporting templates provided to Public Complaints Commission in Nigeria to build capacity and accountability</p> <p>Nigeria: Executive briefing sessions by CBI, NESG, IoD towards harmonization of corporate governance codes in the financial services sector being undertaken by SEC and CBN</p> <p>Malawi: Ethics Capacity Building Program: 27 officers have been trained and certificated to date.</p> <p>Malawi: Monthly newsletter to report on its latest activities</p> <p>South Africa: AICC part of the Public Sector Governance Committee for South Africa to provide thought leadership in the area of governance</p> <p>AICC: www.baacafrika.org Website has been completely redesigned live from Sept 2010.</p> <p>DRC: Ethics SA and AICC are providing training on good governance, ethics standards and anti corruption</p>		<p>Malawi showing particular progress in identifying and training Ethics Officers in its member companies;</p>	
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		<p>HURIDETSA: Identification of training content and development of course outline.</p> <p>HURIDETSA: Needs Assessment exercise to determine training needs of others</p>			
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Annex 2 – Programme Logframe

Programme	OVI: By 2013	MoV	Assumption
<p>Goal: Impact level 1. Significantly reduce corruption to support growth, improved services and attainment of MDGs in Africa</p>	<p>1.1. WB and CBC investment surveys showing improved investors confidence for at least 70% of BAAC countries</p> <p>1.2. CPIA corruption ratings decreasing in at least 70% of BAAC countries from 2008 baseline</p> <p>1.3. At least 70% of BAAC countries improving in TI index from 2008 baseline</p>	<p>1.1 Investment Surveys (WB, CBC); 1.1 Gini Coefficient 1.2 WB Country Policy and Institutional Assessment (CPIA) 1.3 TI Index;</p>	
<p>Purpose: 2. Support strengthened accountability framework and practices including: 2(a) More capable, accountable and transparent public service 2(b) improved corporate governance standards in public and private sector 2(c) improved conditions for doing business</p>	<p>2.1 Strengthened Corporate governance regimes for public and private sector and improve business climate as expressed by: 2.1 (a) - Demonstrable improvements in business regulatory environment in BAAC countries - Quality of public administration in BAAC countries</p> <p>2.1 (b) - Codes of Conduct for specific business sectors in BAAC countries</p> <p>2.1 (c) - Legal enforcement of intellectual property rights: - Improvement of property rights and rule-based government in BAAC countries - Increase of foreign and domestic direct investment in BAAC countries - Business environment improving in terms of reliable justice in BAAC countries - Business environment improving in terms of tax policy in BAAC countries</p>	<p>2.1(a): CPIA criteria 6 & 15 2.1(b-c) APRM reports 2.1 (b-c) Country and project reports 2.1 (c) CPIA criteria 12; UNCTAD FDI statistics; CBC Business Environment Survey</p>	<p>Sustained public and private investments Minimal global economic shocks and impact on project resources (sterling value)</p>
<p>Outputs: 3. Support Establishment of 10-12 joint private-public national anticorruption programmes with defined strategies</p>	<p>3.1 Creation of BAAC structures and work plans - Piloting of specific approaches of projects holding governments accountable leading to the identification of replicable models - Replication of at least 3 piloted models/approaches to hold government accountable in other African countries - Leverage of funding for replicated models/approaches 1:1 of initial DFID investment</p>	<p>3.1 Project Reports 3.1 National Media Reports Parliament and oversight bodies (anticorruption, ombudsmen teams etc)</p>	<p>National political leadership supports reform AU maintains and deepens improved governance strategy Improved engagement of civil society and media</p>

<p>4. Recognition of the need for action for benchmarking in corporate governance reforms – the African Peer Review Mechanism (APRM), adoption of Codes of Conduct and Company Rating System</p>	<p>4.1 Adoption of benchmarking criteria in APRM by 10 countries; 4.2 Agreement of Guidelines for Company Ratings System; Company Ratings System applied in BAAC countries; Private sector companies including multinational companies and SMEs participating in Company Ratings System 4.3 Agreement of Codes of Conduct Framework at national levels; Codes of Conduct applied and compliance reported on in BAAC countries;</p>	<p>4.1 APRM country reports 4.1 APRM reviews 4.1AU reports 4.2 Project Reports 4.3 Corporate Governance Project Reports</p>	<p>Strong support from foreign investors and national companies for zero tolerance in business</p>
<p>5. Enhanced capacity of civil society, media and oversight bodies to address corruption</p>	<p>5.1 Capacity-building via training, advocacy and information as shown by:</p> <ul style="list-style-type: none"> - Cases of corruption being reported in national media (change from 2008 baseline and by relevant countries) baseline and follow up), <p>Reporting of national media on corruption cases a) Prosecuted and; b) Charges enforced (all increasing from 2008 baseline in relevant countries)</p> <ul style="list-style-type: none"> - Feedback from participants in training events: 70% satisfaction rate in average; examples of practical application of know-how <p>5.2 Improved integrity of CSOs and; Improved integrity of the media</p>	<p>5.1 Project reports and evaluations 5.1 Baseline studies 5.2 Global integrity index for CSOs and for media</p>	

Annex 4 – Materials produced during the reporting period- Attached

Item	Date	Title or description of material	Access web site (if any)
1.	8 April 2010	BAAC Launch-Zambia Chapter	
2.	Jan 2010	BAAC Malawi Newsletter	
3.	Mar 2010	BAAC Malawi Annual Report	
4.	Dec 2009	Ethics and Transparency in Business Transactions- Presentation by Soji Apampa	
5.	Feb 2010	BAAC Workshop- Concept Paper- Ghana Chapter	
6.	Feb 2010	BAAC Workshop Report –Ghana Chapter	

7.	Mar 2010	Ghana-BAAC: Developing A regional Code of Conduct Questionnaire	
8.	July 2010	Draft Code of Conduct for Private Sector – Botswana Chapter	
9.	Jun 2010	BAAC Proposal-Siemens Integrity Initiative (**Confidential** not for distribution outside DFID/KPMG/Triple Line)	
10.	14-15 May 2010	Good Governance and Regulatory Leadership Forum, Nigeria	
11.	Nov 2009	Minutes-BOCCIM and HURIDETSA- Botswana Chapter	
12.	April 2009	Minutes- BOCCIM and HURIDETSA- Botswana Chapter	
13.		Nigerian Business Principles	
14.	Jan 2010	BAAC Malawi-Anti Corruption Rating Framework	
15.	Dec 2009	Nigerian Economic Summit-Final Declaration	
16.	July 2010	BAAC Website	http://www.baacafrica.org/
17.	March 2010	Doing Good Business in Africa- Africa Progress Panel and Concern Universal	http://www.concernuniversal.org/

Annex 5 – Web Update for your programme

Web Update for the reporting period

	<p>Supporting Members of BAAC Malawi</p>
	<p>Business Symposium, Malawi January 2010</p> <p>This outstanding event was organized by the Business Action Against Corruption and the Anti-Corruption Bureau. The aim of the Symposium was to unpack the National Anti Corruption Strategy and to explain the implications this strategy will have for private business in Malawi. The event received considerable support by member companies and partner organizations such as GTZ. It attracted attention within the BAAC member companies and beyond in Malawi's business community.</p>
	<p>Ethics Officer Training, Malawi</p>



Annex 6 - Annual Workplan

Annual Work Plan
For the Period 1 April 2010 to 31 March 2011

GTF Number: GTF 272

Organization: BAAC

Output No.	Description of Activities	Start Date	Finish Date	Verifiable Output for Activity	Responsible
1	Output 1 – Support Establishment of 10-12 joint private-public national anticorruption programmes with defined strategies				
Nigeria	Activity 1.1 Baseline development on activities of the National Ombudsman (Public Complaints Commission)	01/04/10	29/10/10	Report of the activities of the Public Complaints Commission Published for the first time since it was conceived in 1976	CBi
	Activity 1.2 Partnership with Channels Television, Business Day Newspapers and News Agency of Nigeria to popularise the activities of the National Ombudsman	04/10/10	31/03/11	Media reports	CBi
	Activity 1.3 Launch of an independent public feedback mechanism in partnership with Public Complaints Commission, Channels Television, Business Day Newspapers and News Agency of Nigeria	01/12/10	31/01/11	Media reports	CBi
Botswana	Activity 1.4 Development of a terms of reference	05/07/10	30/07/10	Project Reports	DCEC, BOCCIM, HURIDETSA
	Activity 1.5 Development of an action plan	05/07/10	30/07/10	Project Reports	DCEC, BOCCIM, HURIDETSA
	Activity 1.6 Identification of members for the BAAC	05/07/10	30/07/10	Project Reports	DCEC, BOCCIM, HURIDETSA
	Activity 1.7 Launching the BAAC	12/10	12/10	Project Reports	DCEC, BOCCIM, HURIDETSA
Malawi	Activity 1.8 Release of newsletter on a monthly basis including latest news from the network as well as a knowledge part sharing experiences from member companies among all subscribers.	Ongoing		Ongoing Publication	BAAC Malawi
	Activity 1.9	10/10	11/10	Project Reports	BAAC Malawi

	Organization of an Ethics Officer Training				
	Activity 1.10 Organization of further CEO roundtable meetings (two of them already held in June 2010)	06/10	12/10	Project Reports	BAAC Malawi
South Africa	Activity 1.11 National consultations with stakeholders	01/04/10	31/07/10	- Partnerships established with NACF, BUSA and other key institutions - Areas for BAAC intervention in SA are identified	AICC
	Activity 1.12 Support development of thought leadership position papers at the Public Sector Governance Committee at the Institute of Directors	01/04/10	31/03/11	- three thought leadership papers are produced	AICC
	Activity 1.13 Support civil society participation at the National Anti-corruption Forum (NACF)	01/07/10	31/03/11	- Successfully co-convene civil society indaba (meeting) with NACF, SANGOCO, ISS and BUSA	AICC
DRC	Activity 1.14 National consultations with stakeholders	01/04/10	31/08/10	- Partnerships established with key institutions (including USIP, EthicsSA and FEC Congo) - Areas for BAAC intervention in DRC are identified	AICC
	Activity 1.15 Workshop in DRC	01/07/10	31/12/10	- Working group in DRC established - BAAC launched in DRC	AICC
	Activity 1.16 Development of Code of Ethics in DRC	01/07/10	31/12/10	Code of Ethics for private sector developed and disseminated	AICC
	Activity 1.17 Training on Ethics and Corporate Governance	01/08/10	31/03/11	- two Training sessions successfully held	AICC
Tanzania	Activity 1.18 Consultations on Launch of BAAC	08/10	08/10	Consultations have been made and consensus developed for the formation of the national BAAC Chapter. Consensus for BAAC to implement of Goal 4 of the national anti-corruption strategy of Tanzania.	HURIDETSA/PC CB/TPSF
	Activity 1.19 Launch of BAAC	02/11	02/11	Project Reports	HURIDETSA/PC CB/TPSF
	Activity 1.20 Consultations on enforcement of Codes of Conduct and implementation of monitoring mechanism	02/11	02/11		HURIDETSA/PC CB/TPSF

Lesotho	Activity 1.21 Development of Terms of reference	07/10	07/10	Terms of Reference have been developed and circulated to DCEO and the main private sector body	HURIDETSA
	Activity 1.22 Consultations with the private sector and DCEO	07/10	07/10	Consultation with DCEO underway and plans for proposed meeting underway	HURIDETSA/DC EO/Lesotho Chamber of Commerce
	Activity 1.23 Launch of BAAC	02/11	02/11	Project Report	HURIDETSA/DC EO/Private Sector
	Activity 1.24 Consultations on enforcement of Codes of Conduct	02/11	02/11		HURIDETSA/DC EO/Private Sector
Zambia	Activity 1.25 Launch of BAAC Zambia Chapter	04/10	04/10	Project Report	HURIDETSA and ZBF
	Activity 1.26 Training of Ethic Officers	09/10	10/10	Train 15 Ethics officers	HURIDETSA and ZBF
	Activity 1.27 National Meetings to discuss develop code of conduct for private and public sectors	1/11	1/11	Terms of Reference have been developed and codes of conduct adopted	HURIDETSA and ZBF
Cameroon	Activity 1.28 Coach and Train young breed of inspectors through training workshops	07/10	12/10	2 training sessions to be held	WABA Cameroon

2	Output 2 – Recognition of the need for action for benchmarking in corporate governance reforms- the African Peer Review Mechanism (APRM), adoption of codes of conduct and company rating system				
Integrity Rating System	Activity 2.1 Agreement of Guidelines for Ratings System in Nigeria, Ghana, & Senegal	23/04/10	01/12/10	- Media reports on coverage of ceremony to announce ratings of first set of companies and launch of ratings kite mark in Nigeria. Reports in Ghana and Senegal on guidelines agreed. Guidelines document published on CBI website.	CBI

	Activity 2.2 CBI ratings/certifications scheme adopted as model by WBI and included in standards shared with African countries participating in their collective action programmes	01/04/10	01/12/10	WBI dedicated website on collective displays such information	CBI
	Activity 2.3 Kenya, Mali, Benin & Togo have received detailed presentations on the benefits of a rating system.	01/11/10	31/03/11	Feedback/evaluation forms from events held to achieve this	CBI
Codes of Conduct	Botswana: Completed Codes of Conduct for the Private Sector			DCEC has scheduled a meeting with BOCCIM and the consultant who authored the codes	Maphanyane and Associates (Consultant responsible for producing the codes)
	Activity 2.4 Handover of completed Codes of Conduct for the Private Sector	16/06/2010	16/06/2010		DCEC, BOCCIM, Maphanyane and Associates (Consultant responsible for producing the codes)
	Activity 2.5 Identification of team to spearhead implementation of the codes	16/06/2010	16/06/2010		DCEC,BOCCIM
	Activity 2.6 Development of an implementation monitoring tool	21/06/2010	31/08/2010		Identified team from activity 1.2
APRM	Activity 2.7 Engagement with Key Partners and Institutions	01/04/10	31/12/10	Partnership established with key official African institution and relevant stakeholders	AICC
	Activity 2.8 Project Conceptualisation	01/04/10	31/12/10	- Project concept papers are developed - Agenda and Briefing materials are developed - Experts are identified as resource people	AICC
	Activity 2.9 Technical and Partners Meeting to determine project parameters and determine result framework	01/01/11	31/03/11	- Technical meeting of experts is held - Working group is set up to develop tool	AICC

3	Output 3 - Capacity-building via training, advocacy and information				
Nigeria	Activity 3.1 Training Sessions for staff of the PCC on collective action in the fight against corruption and the handling of electronic complaints records	01/11/10	31/03/11	Feedback/evaluation forms from events held to achieve this	CBi
	Activity 3.2 Executive briefing sessions by CBi, NESG, IoD Nigeria towards harmonization of corporate governance codes in the financial services sector being undertaken by SEC and CBN	01/04/10	31/03/11	Media reports	CBi
BAAC Website and Portal	Activity 3.3 Set-p including both content and technical	01/04/10	01/08/10	BAAC website and portal is set up and running live	AICC
	Activity 3.4 Content management and facilitation	01/04/10	31/03/12	BAAC website and portal is set up and running live and well maintained	AICC
	Activity 3.5 Technical management	01/04/10	31/03/12	BAAC website and portal is set up and running live and well maintained	AICC
	Activity 3.6 Identification of Training content and development of course outline.	01/11	01/11	Project Reports	HURIDETSA
	Activity 3.7 Needs Assessment Exercise to determine training needs of officers	01/11	01/11	Project Reports	HURIDETSA

Prepared by: Sunayna Sethi
Date prepared: 7th July 2010

Annex 7: Full Country Progress Reports- Attached