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# Who to Blame for Blurred National Integrity Strategy to Prevent Corruption in Bangladesh: Structure or Agency?



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## Abstract

*This study examines Bangladesh's National Integrity Strategy (NI-Strategy) and contends that its reliance on institutional isomorphism fails to effectively address corruption. The study employs a mixed-methods approach, integrating both quantitative data from a national survey and qualitative insights from interviews with key stakeholder informants. This allows for a comprehensive analysis, ensuring data triangulation to establish the strength and validity of the study's findings. The study demonstrates that the NI-Strategy mainly failed due to structural problems, such as weak institutional capacity, lack of coordination, little mutual reinforcement and manpower shortage. Results from two surveys found that all major institutions were very weak and lacked capacity. The study identified the agency problem, developed as a strategic response to international pressure on Bangladesh by policy makers. The policy makers enacted this response to satisfy international donors and procedural requirements. The study also suggests that most of the strategy's components are fragile, with Bangladesh lacking the capacity to effectively combat corruption using this framework.*

**Keywords:** National Integrity System, anti-corruption, corruption, Bangladesh, strategic response

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## **Introduction**

Bangladesh's efforts to combat corruption, such as the National Integrity Strategy (NI-Strategy), were formed in response to donors, such as the Asian Development Bank (ADB) and the Japan International Cooperation Agency (JICA), and were modelled on international anti-corruption frameworks, such as Transparency International (TI)'s National Integrity System (NIS). The NIS is a mainly a horizontal accountability framework which ensures accountability through 'mutual reinforcement' between two or more organisations.<sup>1</sup> In recent years, donors have raised the profile of their governance and anti-corruption strategies through analytical and practical activities. In the 1980s and 1990s, a wave of corruption swept across the West and became a global concern. Several multilateral international and regional government organisations, including the Organisation of American States (OAS), the United Nations (UN), the European Union (EU), the African Union (AU), the Council of Europe (CoE), the Organisation for Economic Cooperation and Development (OECD), the International Monetary Fund (IMF) and the World Bank, adopted international conventions and guiding principles to combat corruption. New anti-corruption government networks, such as the Council of Europe's Group of States against Corruption (GRECO), were created to assist countries in combating corruption. Furthermore, international non-governmental organisations (INGOs), such as Transparency International (TI), emerging as new 'integrity warriors', were included by the ADB and JICA as they sought to raise awareness against corruption. At the same time, TI and its national chapters, along with many donors, raised public awareness and exerted pressure on decision-makers to adopt and implement anti-corruption

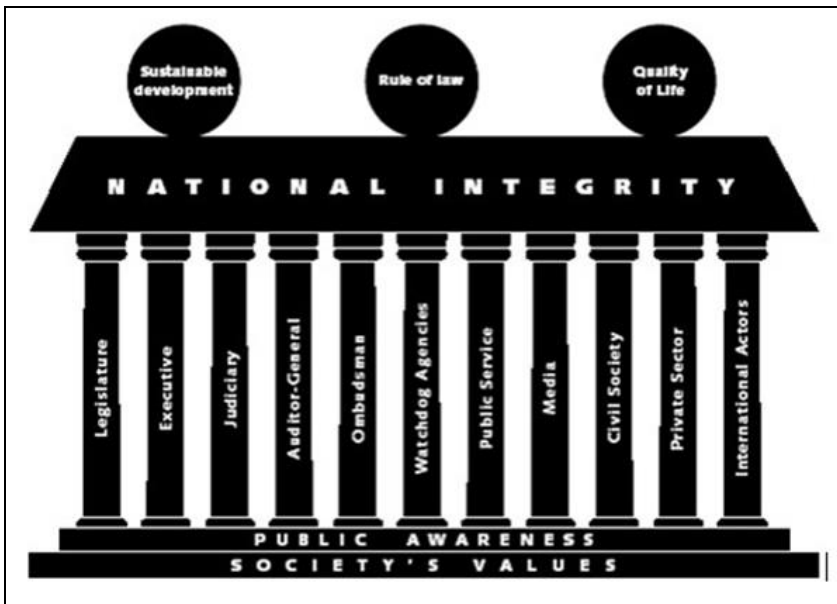
reforms. The international community (mainly donors) either suggested or exerted pressure on governments to prescribe packages of anti-corruption measures, such as TI's National Integrity System (NIS) model which uses the "Greek temple" metaphor.<sup>2</sup>

Not surprisingly, anti-corruption reforms since 1990 have affected Bangladesh. After opening its Bangladesh chapter, Transparency International Bangladesh (TIB) exerted immense pressure on the country to establish the National Integrity System (NIS) framework. This study critically examines the outcome, namely, the National Integrity Strategy (NI-Strategy)<sup>3</sup> through the lens of the structure–agency debate. This debate seeks to explain social phenomena by exploring the interplay between institutional structures—formal rules, resources and systems—and the actions of individuals or groups who, despite often being constrained by these structures, also have the capacity to influence them. The study's main argument, in its comprehensive analysis of the failure of the NI-Strategy, is that the failure can be attributed to both structural and agency problems.

### **The National Integrity System Approach as Isomorphic Policy**

In the 1990s, TI co-founder Jeremy Pope created the NIS framework for 'horizontal accountability.' As Pope (2000) stated, democratic societies have vertical and horizontal accountability, with vertical strategies for fighting corruption usually failing. Pope implemented the National Integrity System (NIS) approach which supported horizontal accountability. In the horizontal accountability framework, the government's organs and governance indicators constitute the 'pillars' for societal intervention, according to Pope,

forming a 'virtuous circle', thus distinguishing the NIS model from vertical accountability systems. Figure 1 depicts Pope's NIS framework as the 'Greek Temple'.



**Figure 1: Institutional Pillars of the NIS Framework, known as the "Greek Temple"<sup>4</sup>**

Each pillar serves a purpose, with the core (guardian) agencies investigating, deterring and educating against corruption. Civil society and the media condemn unsuccessful programs and support corruption victims.<sup>5</sup> The Greek temple structure implies that all institutions are accountable to each other. Watchdog organisations focus on corruption in all areas, with civil society and the media focusing on their performance. The courts and legislature oversee civil society and the media to avoid bias. Public consciousness and social aspirations underpin the temple. The three 'keystone symbols' symbolise sustainable development, rule of law and quality of life. For these balls to

stay in place, all pillars must be parallel.<sup>6</sup> Most countries share the national integrity pillars and follow 'rules and practices' that indicate their strengths and weaknesses, although the pillars in different cultures may vary.

The NIS framework seeks to address corrupt 'high risk' behaviors, not those that are 'low risk'. Maintaining checks and balances with this integrity structure can reduce corruption, even if some pillars do not perform well. This study examines Bangladesh's NI-Strategy's strengths and weaknesses in light of the critical assessment of the National Integrity System (NIS).

### **Theoretical Framework: Structure and Agency Debate**

Structure and agency are central ideas in social theory which examines how the activities of individuals (agency) interact with social, political and economic systems (structure). The word 'agent' is defined as an individual or collective entity (e.g., a group or organisation) that has the capacity to act independently and make free choices. Therefore, the word 'agency' denotes the capacity to choose an action from different options, learning from prior experience and achieving the best outcome from the action taken. On the other hand, the word 'structure' is defined as that which 'empower[s] different aspects of social existence'. In other words, structure authorises what it designates. Alexander Wendt<sup>7</sup> describes structure as being shaped by material conditions, interests and ideas. Different agents in the structure understand their roles by adopting the standards that they learn through the process and other structured behaviours. The process functions in two ways: firstly, agents internalise the standards that are compatible with individuals' values and, secondly, they set the benchmark for their structures by analysing other agents' behaviour and actions. Establishing a poverty-free society, achieving development and good

governance by combatting corruption in developing countries is challenging. However, the moral decadence of individuals and groups cause corruption with its severe socio-political consequences. This problem can be labelled as an agency problem.

The structure–agency debate examines power dynamics and the extent to which individuals or institutions shape and are shaped by broader systemic structures. Scholars in social sciences, including Carlsnaes (1992), Hobson and Ramesh (2002) and O'Neill *et al.* (2004), debate at length whether social phenomena are predominantly influenced by overarching structures—rules, norms and resources—or by individual agency which denotes the capacity to choose, adapt and initiate change. Giddens defines structure as the “rules and resources that are intricately involved in the continuation of social systems”, with these not only supporting but also constraining individual agency.<sup>8</sup> In contrast, agency emphasises individual or collective autonomy in action, allowing individuals to learn from past experiences and enact changes within the bounds of societal structures.<sup>9</sup>

Dowding highlights that this debate is central to an understanding of how power operates within institutional settings, with structure focusing on the design of power systems and agency on the capacity of actors to leverage or resist these systems.<sup>10</sup> In the context of corruption and governance, structure might be understood as the institutional frameworks—laws, norms and accountability mechanisms—that govern behavior, while agency reflects the actions of policy makers, public officials and other actors within these frameworks. The structure–agency dilemma is particularly relevant in anti-corruption frameworks, where successful reform relies on mutual reinforcement between structure and agency. For example, Bäckman<sup>11</sup> shows how global anti-corruption frameworks can encourage countries

to adopt integrity measures, but also how local political cultures and institutional capacity substantially impact their implementation. In countries where institutional corruption is deeply embedded, structural constraints can hinder effective policy implementation. Similarly, Mungiu-Pippid illustrates that, without addressing underlying structural issues, such as patronage networks and lack of political will, national integrity strategies may remain superficial and fail to produce meaningful change.<sup>12</sup>

While structural considerations are important, national integrity strategies are also greatly influenced by agency. Whether undertaken by people, legislators or bureaucrats, both individual and group efforts can spur reforms and combat unethical behavior. Rose-Ackerman, for example, highlights the value of public advocacy and engagement in promoting accountability and transparency.<sup>13</sup> Through citizen mobilisation and the development of a sense of agency, civil society movements can pressure governments to take more moral action. Furthermore, the priorities and values of people in positions of authority (leadership) frequently influence integrity strategies. While leaders who uphold the status quo may serve to strengthen current structural barriers to reform, those who place a higher priority on integrity and accountability have the power to affect institutional change.

In this study, these theoretical perspectives offer valuable insights. Structural constraints can include legal frameworks, institutional norms and cultural values that shape the definition and enactment of integrity within a country. Conversely, agency is reflected in the actions of policy makers, civil society and citizens who actively engage with, or resist, these structures. This study elaborates on this debate, with a central focus on Bangladesh.

## **Data Collection Method**

This study examined the anti-corruption efforts in Bangladesh through the NI-Strategy, exploring its impact through a multidimensional research methodology approach. The NI-Strategy's performance in Bangladesh was investigated using in-depth analysis, citizen surveys and documentary analysis. In total, 42 in-depth interviews were conducted with key stakeholder informants at various locations in Bangladesh. The in-depth interviewees were selected using purposive sampling, the main criteria being their ability to contribute to the research (questions, objectives, propositions) and to manage the accessibility constraints.<sup>14</sup> The study divided interviewees into significant groups, such as present and former top-ranked anti-corruption officials; present and former secretary and additional secretary of the government; academics from various universities; a top journalist who covered news on corruption; and non-governmental organisation (NGO) and civil society members who actively work to prevent corruption, etc. The interviews were conducted in two phases: the first phase between September 2015 and April 2016, and the second phase between September 2019 and April 2020.<sup>15</sup>

Data gathered through small surveys (Bangladesh Citizens' Survey [BCS] 2015–2016 and BCS 2019–2020) were an important part of the research, aiding in the testing and validation of the TIB survey elements. The survey's primary purpose was to gather information on citizens' perceptions of the NI-Strategy in Bangladesh. These results were then integrated with the qualitative data to support the arguments. The total sample for BCS 2015–2016 was 302, while for BCS 2019–2020, it was 271. The samples were stratified according to region, gender, age, occupation and education to accommodate all divisions in Bangladesh, thus representing the whole society. In addition to in-depth interviews and citizens' surveys, official documents were



reviewed for this study. Keywords, such as 'NIS', 'National Integrity Strategy of Bangladesh', 'anti-corruption strategy of Bangladesh', etc. were used, with the internet searches conducted.

### **United Nations Convention against Corruption (UNCAC) and Origins of Bangladesh's NI-Strategy**

In Bangladesh, some major reforms conducted since 2000 have failed to mitigate corruption. Therefore, in 2004, the Bureau of Anti-Corruption was abolished to create the Anti-Corruption Commission (ACC). Bangladesh joined the United Nations Convention against Corruption (UNCAC) in 2007 when the military-backed caretaker government was in office. Bangladesh has passed various laws since 2004, including the *Anti-Corruption Commission Act 2004*; *Public Procurement Act 2006 and Rules 2008*; *Right to Information Act 2009*; *Whistle Blowers' (Protection) Act 2011*; *Prevention of Money Laundering Act 2012*, etc. In 2012, the government created the NI-Strategy to fight corruption.

When the military-backed caretaker government took office in 2007, international donors such as the ADB and JICA exerted pressure on Bangladesh to implement reforms. In February 2007, Bangladesh signed the UNCAC, believing that this would help Bangladesh to establish democracy, the rule of law and human rights, constitutional freedom, equality and justice. The then-government received a US\$150 million loan from the ADB in 2007 to support the Good Governance Programme (GGP), economic growth and public service access. The ADB also provided technical support for project set-up.<sup>16</sup> Thus, the ADB, with expert advice from BRAC University's Institute of Governance Studies (IGS), helped Bangladesh's Cabinet Division to create its NI-Strategy. With support from the Cabinet Division, Deputy Commissioners, district administrations and local dignitaries, 53 focus group sessions were organised across Bangladesh, with these sessions crucial to the approach.

The government also identified the most pressing issues and suggested pillars for the plan

However, due to concerns that an elected administration could take over, the military-backed government did not accept the strategy. In 2009, the Awami League (AL) won the general election with a landslide majority. The AL, in its electoral manifesto, promised “multi-purpose action” to fight corruption. The AL government created laws, rules, policies and plans to establish good governance to fulfil this promise. Bangladesh’s signature on the UNCAC helped the country to adopt this legislation and these action plans. An UNCAC signatory must organise a conference of state parties within a year “to achieve the objectives outlined in this Convention and to promote and review its implementation” (Article 63.1). Additionally, state parties must verify legislation and pass new laws or establish bodies in accordance with UNCAC standards.<sup>17</sup> Bangladesh met the deadline, with increased pressure from donors for UNCAC ratification.<sup>18</sup> After the new government achieved stability in 2009, international donors and local consultants submitted the “Commitment for Golden Bengal: National Integrity Strategy of Bangladesh”, the NI-Strategy to the head of the government. Before delivering the NI-Strategy to the Prime Minister, Cabinet Secretary Musharraf Hossain Bhuiyan sought assistance from government policy makers and other stakeholders over a three-year period. Subsequent meetings and suggestions led to revision of this document. The Cabinet finally adopted this approach on 18 October 2012 (GoB, 2012c). The Prime Minister, believing that this strategy was necessary, authorised its implementation.

After Bangladesh adopted the NI-Strategy,<sup>19</sup> the Japan International Cooperation Agency (JICA) supported its implementation, believing that it was essential for good

governance in Bangladesh. The NI-Strategy Support Project began in October 2014 to create an implementation framework.

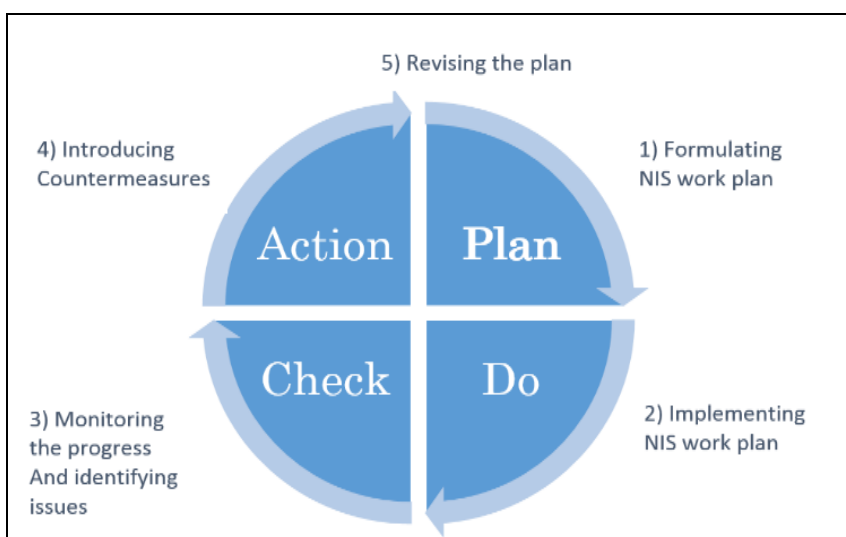
### **The NI-Strategy: How it Works**

The NI-Strategy is characterised by a robust legal framework and an extensive array of objectives, strategies and action plans. These are designed to enhance the autonomy, productivity, responsibility, efficiency, transparency and efficacy of both government organisations and non-governmental organisations (NGOs).

The NI-Strategy has clear similarities with, and differences to, Pope's (2000) NIS framework, developed for Transparency International (TI). The NIS and NI-Strategy both comprise state and non-state institutions. In total, the NI-Strategy has 16 pillars. The 10 state pillars are: Parliament; ministries and divisions; the judiciary; local government institutions; Attorney-General; Public Service Commission (PSC); Election Commission; Anti-Corruption Commission (ACC); Office of the Comptroller and Auditor General (C&AG); and Office of the Ombudsman. The six non-state pillars are civil society, political parties, NGOs, the private sector, the media and the family.<sup>20</sup>

Additionally, the government established the National Integrity Advisory Council on 29 November 2012, led by the Prime Minister and comprising 49 members, including cabinet officials, legislators and representatives from various sectors, with its aim being to spearhead the implementation of anti-corruption measures in Bangladesh. The Executive Committee convenes biannually to assess progress and issue directives. The Cabinet Division orchestrated the National Integrity Implementation Unit (NIIU), overseen by the Cabinet Secretary and spearheaded by an additional secretary. Ministries were mandated to form ethics committees, ensuring adherence to the NI-Strategy. These committees, led by high-ranking officials, were tasked with fostering integrity within their respective ministries. Integrity focal points within ministries liaised with the Cabinet Division for

coordinated efforts. Administrative oversight was centralised under the Cabinet Division, while the NGO Affairs Bureau and Ministry of Commerce monitored integrity in NGOs and corporations, respectively. Notably, integrity awards were instituted to commend exceptional contributions to combatting corruption. This multifaceted approach aimed to instil a culture of integrity across public, civil and corporate sectors, facilitating effective implementation of anti-corruption measures in Bangladesh.



**Figure 2: NI-Strategy Monitoring Framework of the Executive Committee<sup>21</sup>**

In addition, Standard Operating Procedures (SOPs) were prepared to review and monitor the progress of the NI-Strategy for each body. Thus, the Executive Committee was expected to undertake the NI-Strategy's 'plan-do-check-action cycle' steps (see Figure 2).

### **Some Positive Measures to Make the Strategy Effective**

The development of this strategy was a key milestone for Bangladesh. It created an opportunity for policy makers to combat

corruption and promote good governance. One government official interviewed for this study, who is actively involved with the NI-Strategy implementation, argued that it has been developed not only to combat corruption but also to expand good practices across society. The goal of the NI-Strategy is to break down every day petty corruption in all sectors and bring 'integrity' into public life.<sup>22</sup> Thus, it is a living document in Bangladesh society and provides a very good start for Bangladesh.<sup>23</sup> Although the strategy has only been operational since 18 October 2012, it has achieved some positive outcomes.

Firstly, key aspects of the NI-Strategy include pillar-specific goals, problems and plans. The JICA helped to construct ethics committees, raise corruption awareness, identify Inclusive Finance Project (IFP) assignments and create National Integrity System (NIS) monitoring standards. The NI-Strategy describes the status, functions, performance targets and difficulties of each institution and organisation. Implementation time frames are provided for action plans. These are short term (one year), medium term (three years) and long term (five years). The NI-Strategy is a living document that allows for new action plans and implementation as needed. Organisations or institutions must format their actions as shown. Besides these action plans, the NI-Strategy has reformed numerous laws and passed new anti-corruption laws. Parliament strengthened the Fifteenth Constitutional amendment to increase judicial independence. In the Ninth Parliament, 180 laws and 33 work plans and policies were passed from 2009–June 2012 to combat corruption and promote integrity. A few of these laws have been useful. The *Right to Information Act 2009* allows citizens to request government information. If officials deny citizens information, they can complain to the Information Commission which holds a 'public hearing' and makes a ruling on the complaint.<sup>24</sup> Additionally, modernising land administration and planning is helping to resolve land disputes,

with land-related documents now stored digitally through the database. The average individual can now easily access services more often.<sup>25</sup>

S. No.	Interventions	Performance Indicator	Time Frame	Responsibility	Supported by
1.	Modernisation of land administration and planning	Digitalised land administration system	Medium term	Ministry of Land	Ministry of Public Administration

**Table I: Example of an Intervention of the NI-Strategy**

Secondly, the NI-Strategy accountability mechanisms comprise an annual performance agreement (APA), a grievance redress system (GRS) and e-filing. The APA is a legal agreement between the Cabinet Secretary, who represents the Prime Minister of Bangladesh, and the relevant ministry or division secretary, who represents the Minister. Government performance management systems are used to promote transparency, accountability, resource allocation and efficiency. This agreement describes the ministry or division’s strategic goals, the activities needed to attain them and the metrics used to evaluate them. At year’s end, the ministry or division's actual successes are compared to the agreed-upon targets. The GRS, run by the Cabinet Division, allows citizens to complain about government services. Citizens can report anonymously or with their contact details. The Cabinet Division handles public claims.<sup>26</sup> To eliminate public service delays and administrative errors, the government has implemented e-filing. <sup>27</sup> The NI-Strategy emphasises the use of social media to make the public service more responsible. Social media complaints and information sharing in Bangladesh have shown promise in improving public services.<sup>28</sup>

Thirdly, the NI-Strategy implementation body prioritises addressing corruption by officials and stakeholders, as well as to raising integrity awareness. Thus, it holds frequent seminars and workshops in ministries, divisions and departments. To help promote the NI-Strategy, civil society groups, bureaucrats, lawyers, university teachers, legislators, students and media professionals attend these seminars and workshops, which also uncover NI-Strategy flaws and offer solutions. Bangladesh Television has broadcast a best practices documentary from the NI-Strategy implementation body. This has encouraged anti-corruption activists and created integrity role models. Journalists were trained to promote the NI-Strategy in the media at a special session.<sup>29</sup>

In addition, awareness raising and 'on-field actions' have been part of the plan. Some activities include ministry and department public hearings. With ACC assistance, several government agencies now willingly hold public hearings to identify public service delivery issues. Public hearings allow citizens to question and criticise personnel in front of ACC officials and respected department heads. This has opened the way to new corruption solutions. Public hearings by the ACC in the land sector, especially at Rajdhani Unnayan Kartripakkha (RAJUK) but also at other land offices, have had a big impact. In these extremely well-attended hearings, citizens could protest about officials, with officials agreeing to resolve these issues within two days and without taking bribes. The ACC, the Deputy Commissioner's (DC) Office and TIB tracked these concerns and their resolutions. Government officials have also started a mobile court to address private sector issues including food adulteration and land grabbing. High-ranking Cabinet Division and ACC officials are also conducting surprise inspections in various places. These tours seek public input, identify corruption issues and take action against corrupt individuals in selected areas.<sup>30</sup> Corruption in Bangladesh needs

major attention, according to these NI-Strategy measures, with a few of these measures promoting public service delivery.

### **Why NI-Strategy Implementation Remains Blurred: Structure or Agency?**

Despite achieving a few targets, the NI-Strategy still lacks practical implementation due to structure and agency problems. Although some positive feedback has been received, the strategy's overall performance has been very disappointing. This study draws attention to the point that the implementation of the National Integrity System (NIS) has been only ceremonial due to these problems. Successful anti-corruption efforts require support at both the structure and agency levels. With the NIS implementation, this study has found both structure and agency problems, resulting in an NIS that is ineffective.

### **Problems with the Structure**

The patterns in Figures 4 and 5 identify failures in the overall NI-Strategy, the model developed by international donors and the Bangladesh government, to combat corruption. The results are discouraging. The entire structure, designed by the strategy, lacks coordination and intensity, and is incapable to achieving all targets in the strategy.

Both surveys (Bangladesh Citizens' Survey 2015–2016 and 2019–2020) found that citizens judged many of the pillars to be ineffective. Most survey respondents thought many of the pillars were either weak or very weak in performing their specific roles to combat corruption. According to survey respondents, the institutional structures required for the strategy have remained ceremonial only, with no effective measures to prevent corruption. One interviewee signalled the quality of the institutional structure as follows:

*Unlike many other countries, we [Bangladesh] have all the institutional mechanisms to combat corruption. There are ACC,*



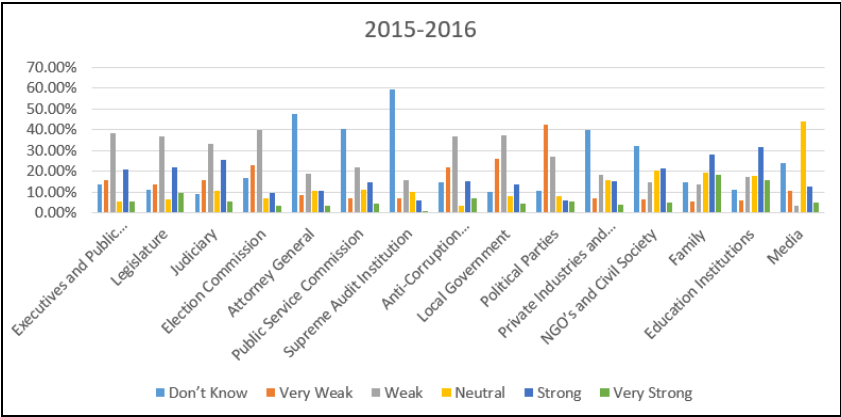
*Parliament, C&AG, National Board of Revenue (NBR) and so on. But what role are they playing? I guess nothing. Parliament, Election Commission, the ACC, all the institutions cannot perform their actual duty due to the complex societal structure. I think the NI-Strategy is just another ceremonial strategy to minimise corruption that has massive flaws.*<sup>31</sup>

This study's interviews showed that interviewees were dissatisfied with the performance of six major institutions: the parliament, the judiciary, the executives, the Election Commission, the ACC and political parties, all perceived to have fewer structural measures to prevent corruption.

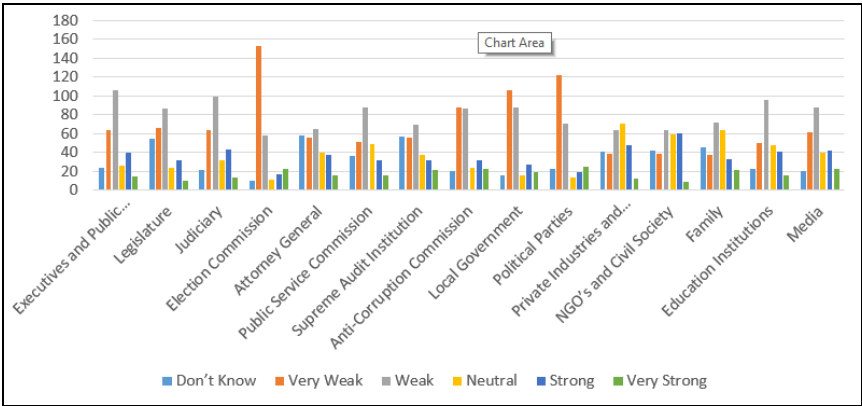
For example, in the BCS 2015–2016 only 9.6 per cent rated the legislature as very strong and 21.9 per cent rated it as strong, while 36.8 per cent and 13.9 per cent rated it as weak and very weak, respectively, in combatting corruption. Similarly, the BCS 2019–2020 found only 3.69 per cent rated it as very strong and 11.81 per cent rated it as strong.

The functioning of the parliament of Bangladesh faces many problems, including the dominance of executives, disregard for the recommendations of parliamentary committees, improper use of resources and a relatively small budget.<sup>32</sup>

Problems are also found within the parliamentary culture, as Members of Parliament (MPs) spend time debating trivial issues during question and answer sessions, such as praising party leaders and the head of the government. In addition, quorum crises occur as MPs spent considerable time outside the parliament to manage their businesses.<sup>33</sup>



**Figure 4: Citizens’ Attitudes to NI-Strategy Specific Pillar (2015–2016)**



**Figure 5: Citizens’ Attitudes to NI-Strategy Specific Pillar (2019–2020)<sup>3435</sup>**

**Source:** Bangladesh Citizens’ Survey (BCS) 2015–2016

The entire NI-Strategy is based on support from the executives. Although some ministries were very active in implementing their action plans, hardly any positive changes were found. Both the BCS 2015–2016 and the BCS 2019–2020 found the executives to be as weak, if not weaker, than the legislature and the judiciary. In all, 54.3 per cent of citizens thought that the executives were either weak (38.4

per cent as per BCS 2015–2016 and 39.11 per cent as per BCS 2019–2020) or very weak (15.9 per cent and 23.1 per cent, respectively) in tackling corruption. The lack of prosecution for high-ranking officials and politicians may contribute to this finding and could also explain the judiciary's perceived weakness. Bangladesh has massive problems with judicial independence, with the government regularly coming into conflict with the judiciary. A different set of causes, increasing every day, probably explains the perception of local government as the weakest government institution (63.6 per cent as per BCS 2015–2016 and 71.1 per cent as per BCS 2019–2020). Local government lacks autonomy and resources, but it is also the level of government with which citizens interact most often. Many of these local interactions involve petty corruption which often appears to go unchecked.

Citizens view the Election Commission as having very limited strength in combatting corruption. The absence of free and fair elections has become a critical issue over the years in Bangladesh, damaging the process of democratic consolidation. The lack of a well-organised, efficient and non-partisan Election Commission has become a key challenge for Bangladesh.<sup>36</sup> Citizens' evaluations of political parties are highly critical, rating them the weakest of all the pillars. While political parties in Bangladesh frequently campaign on anti-corruption platforms, once in power. They often fall short in upholding citizens' rights. This discrepancy highlights a pattern of unfulfilled promises, leaving citizens highly aware of the gap between political rhetoric and actual governance. This awareness fosters a sense of disillusionment, as citizens see politicians leveraging anti-corruption messaging to gain votes without a genuine commitment to integrity or accountability.

These gaps within the institutional pillars result in serious structural flaws when implementing the NI-Strategy. With experts

doubting the applicability of the model in developing countries, the survey results indicate why the NI-Strategy is perceived as merely ceremonial. Moreover, the strategy as a whole has some major structural problems, such as little mutual reinforcement, shortage of manpower and technical skills, insufficient monitoring, and inappropriate tools and indicators, with the details defined below.

### **Little Mutual Reinforcement by Different Pillars**

The NI-Strategy is based on the concept of each pillar making the other pillars accountable. In practical terms, this feature is still missing in Bangladesh. As discussed before, Bangladesh has a dysfunctional parliament which has minimal legitimacy. Civil society and the media are controlled by rival interests and lack integrity. In a more concrete example, the ACC cannot effectively fight against financial corruption as it does not receive cooperation from other organisations, such as the Office of the Comptroller and Auditor General (C&AG), Bangladesh Bank and the National Board of Revenue (NBR). Thus, the concept of mutual reinforcement has not yet been realised.

### **Shortages of Manpower and Technical Skills**

Without effective implementation, much of the NI-Strategy remains as a set of paper documents.<sup>37</sup> The strategy requires that staff not only have integrity and ethics, but they also must have technical and other expertise. To date, the strategy has lacked expertise, creating major problems in its implementation.<sup>38</sup> In one example, the NI-Strategy implementation body released a video to be telecast on Bangladesh Television (BTV). Most people today do not watch BTV, instead relying on private channels. The video has never been telecast on any of these channels. Moreover, the video content does not correctly highlight the NI-Strategy's aims and the examples depicted are not outcomes of

the strategy. Overall, the entire video project appears amateurish and fails to create a useful level of awareness among ordinary citizens.<sup>39</sup>

### **Insufficient Monitoring of Initiatives**

Initiatives taken under the NI-Strategy have mostly been fragmented and have lacked coordination. Many individual success stories have been told, however, the NI-Strategy bodies have failed to monitor or properly integrate those initiatives. As stated by one government employee interviewed for this study:

*...most of the time [the Strategy] remains [as] seminars and workshops, some tours [at] home and abroad, and training. So, to me, it is a paper document and will finish when the project stops. This project has funds for January 2017 ... but you will only get the framework. Inside, there is nothing significant. I don't see any visible action of NIS. However, they will try to get credit for some of the efforts taken by public officials to the field level. But it was not because of NIS; it was their efforts to make it happen. They try to integrate those and take the credit.<sup>40</sup>*

Another interviewee observed that the appearance of activities and initiatives was more important than their effective monitoring or coordination:

*.... but the thing is the government is not a big deal, and the strategies lack political commitment. These strategies look to be in good shape, and this will make the donors happy. Because the government did it as it is prescribed. I don't think it will take us anywhere.<sup>41</sup>*

### **Tools and Indicators were not Well Defined**

Another major drawback of the strategy is that most of the pillars lack well-defined tools and indicators. This makes it very difficult to determine how to achieve them and to know when they have been achieved. For example, the strategy aim of the executive organ and public administration has been identified as the 'establishment of a

transparent executive organ responsive to the demands and needs of people.’ This aim is very general and ignores the realities of an executive administration that is politically motivated. The NI-Strategy has become a project that does not map a clear future with specific goals. As a result, those involved in the NI-Strategy implementation who genuinely support the project face an arduous task.

### **Agency Problem: Strategic Responses from Policy Makers**

The agency dilemma arises when global reformers, such as the World Bank, enter networks of participants in local agencies who are hostile to an agenda for change set externally.<sup>42</sup> Therefore, these reformers have significant difficulties in enacting any new policy through participation by local citizens. To address this, Christine Oliver (1991) creates a thorough model of tactical local reactions to isomorphic pressure. She makes the case that local groups or officials with a significant influence on policy making constantly work to reduce institutional pressure via a tactical response. She also highlights that organisations do not always respond strategically to institutional forces in the same manner.<sup>43</sup> Organisations, in terms of their strategic behaviours, respond differently to these isomorphic challenges. When institutions are under isomorphic pressure from a parent organisation, Oliver outlines five forms of strategic behaviour that they attempt to adopt. The Bangladesh government’s NI-Strategy, which it developed in response to pressure from foreign donors, contains all five forms of these strategies, as discussed in this study. During the creation and execution of the NIS, the agency, in this instance, a ministry, specific bureaucrats or politicians, attempt to adopt certain behaviours. The use of each of these tactics is briefly examined below:

### **Acquiescence**

Oliver (1991) argues that acquiescence may take alternative forms, such as habit, imitation and compliance. Habit refers to blind or unconscious ways of following or granting rules; imitation refers to conscious or unconscious mimicry of the institutional model; while compliance is conscious obedience to, or incorporation of, values, norms or institutional requirements.<sup>44</sup> The NI-Strategy in Bangladesh is a result of acquiescence, a strategic response to international demands. The NI-Strategy first mimicked Transparency International (TI)'s NIS model for promoting good governance. In doing so, the NI-strategy, in most cases, followed their norms and made massive reforms to comply. In the case of citizens' engagement, this study found compliance with international practices in the establishment of Corruption Prevention Committees (CPCs) and the ACC's integrity units. Internationally successful models were mimicked to comply with international donors' expectations. The government representative involved in this initiative indicated that the strategy was to comply with donors.

### **Defiance**

Organisations or actors can dismiss, challenge and/or attack institutional pressures, depending on the reforms or type of situation with which they are confronted.<sup>45</sup> Defiance against promoting the NI-Strategy has frequently occurred since its establishment, with policy makers attempting to dismiss the project several times. As mentioned by one of the interviewees involved in the project:

*We always looked for a suitable opportunity to implement the project as we feared that the people from the government might not like it. Several of our attempts have been denied by the policy makers as they do not want to implement the project.*<sup>46</sup>

Even after the strategy's initiation by donors, all of its pillars have either faced challenges or attacks, or have been dismissed by other actors. Most attacks have been by individual agents who do not want to see the project succeed. More recently, outright defiance of international actors has become more rare, but different Bangladesh governments unwilling to undertake the reforms have attacked civil society members when they have commented on various flaws of the state machinery, such as the Parliament.<sup>47</sup>

### **Avoidance**

Oliver (1991) suggests that institutional pressure is also disregarded by disguised disobedience via concealment, buffering and evasion strategies. Although politicians in Bangladesh have been less equipped to refute foreign allegations of corruption, they might still have sought to evade the most significant adjustments urged by international funders. As previously stated, the NI-Strategy was created in 2007 but not adopted until October 2012.<sup>48</sup> These delays seem to have been implemented with the expectation that the reforms would fail or, alternatively, by allowing enough time for corrupt players to adjust to the new regime.

### **Compromise**

Compromising becomes a strategic option through balancing, pacifying or bargaining. Actors or stakeholders with conflicting demands and expectations resist by compromising to reduce institutional pressure.<sup>49</sup> The strategy of compromise was applied by the Bangladesh government when it had to submit to pressure from donors, civil society and citizens due to the massive growth in corruption. Reforms, such as the NI-Strategy, were eventually adopted but in a weakened form, satisfying international donors but failing to operate as effectively as they should. For example, reforming and implementing 180 laws and



33 work plans and policies for the prevention of corruption and promotion of integrity in three years (from 2009–June 2012) was a massive task that needed an in-depth review. An interviewed expert expressed his frustration as follows:

*Legal matters always need time to [be made] flawless, accurate and, more importantly, context-based. But 180 laws within three years does not make any sense to me. These laws and plans have several flaws, gaps and, ultimately, will not work at all in our country. These are created due to donor pressure to implement the strategy as a part of compromise.<sup>50</sup>*

### **Manipulation**

Of the five forms of strategy defined by Oliver (1991), manipulation is the most proactive reaction by organisations to institutional forces. In reaction to external institutional pressure, manipulation leverages the organisation's authority to manage domestic processes and insulate them from additional pressure.<sup>51</sup> The major factor in Bangladesh's reaction to isomorphic pressure has been manipulation. Multiple institutional players within the NI-Strategy have been weakened via manipulation. When the ACC was founded, for instance, its personnel were not selected independently, with many posts filled with officials from its ineffectual predecessor, the Bureau of Anti-Corruption.<sup>52</sup> Through these and other means, the administration was able to claim it had an anti-corruption body in place while the new ACC was simultaneously weakened. Similar tendencies were prevalent in other institutions, such as the Parliament, Election Commission and the judiciary.<sup>53</sup> According to one interviewee:

*The party in power usually takes these measures (such as reforming ACC, NI-Strategy) on one hand and uses their political influence to control these institutions or strategy on the other. For example, the government passed the Whistleblowers' Protection Act 2011 to*

*make an anti-corruption protest at the bottom level. At the same time, the government passed the Digital Security Act 2018, which made whistleblowers remain silent. Because of the misuse of the Act, people were scared of making a protest against influential people.*<sup>54</sup>

As a result of the varied strategic responses, the NI-Strategy faced some serious flaws when it came to appropriate implementation. Although the strategy had some positive sides, it still lacked effectiveness. Many interviewees had barely heard of the strategy even after nine years had passed. Again, another interviewee's response was of interest:

*I never heard about such a strategy. Are you sure it exists? Because every government took these donor-driven policies only to please the donors. Instead of this sort of policy, government should focus on key institutions and make them effective to prevent corruption.*<sup>55</sup>

Finally, one of the major setbacks of the strategy was the 'integrity award' which showed manipulation and defiance-related problems. According to several interviewees, the integrity award was given to people who were very supportive of the government or to officials who were very close to government but could not be accommodated through promotion. Therefore, at the end of their career, the government rewarded them with the integrity award. Many government employees given integrity awards were later found to be facing various charges of corruption, moral decay, etc. For example, the District Commissioner in the Jamalpur district was accused of a sexual scandal and was suspended in 2019.<sup>56</sup> Similarly, in recent times, a former highly-ranked police official was found to be involved in corruption and building illegal assets: he had also been awarded the integrity award while in charge of the Bangladesh Police.<sup>57</sup> Both cases showed that the government manipulated the 'integrity award', using it as a way to promote its image for personal gain.

## Conclusion and Discussion

The evidence in this study suggests that Bangladesh is not ready to implement its significant isomorphic international agenda, as the country lacks the capacity and capability to fulfil the pillar-specific challenges. Looking at the pillar problems, the micro and macro problems and the present status of the NI-Strategy, the strategy has become solely a paper document that has only pleased the donors. Citizens' responses, key stakeholder interviews and various reports and assessments on the NI-Strategy pillars show that most major components have critical weaknesses on the main issues, with it being challenging for countries like Bangladesh to solve such massive problems. As mutual reinforcement is not happening, the government is unlikely to punish corrupt officials even if the ACC performs flawlessly. Thus, one of the interviewee comments was found to be of interest:

*.... but the thing is the government is not a big deal, and there is a lack of political commitment. These strategies look good in shape, and they will make the donors happy. Because the government did as prescribed. I don't think it will take us anywhere.<sup>58</sup>*

Maybe donors will find many targets are being achieved (through statistics). But the reality is that people are continuing to suffer due to the strategy's lack of success. For example, much funding, including climate change financing, has been used illegally by associated stakeholders, with complaints made of massive corruption. Similarly, the NI-Strategy has become one of those projects without a clear future and lacking specific goals. Thus, those involved in the NI-Strategy implementation have an arduous task ahead as most of the strategy's essential components have major problems (e.g., political influence). The entire NI-Strategy needs a massive level of political will for it to be implemented which, considering the present condition of the country, appears to be a blurred expectation.

**End Note**

1. The National Integrity Strategy (NI-Strategy) is the policy implementation of Pope's (2000) concept of the National Integrity System. The acronym 'NIS' would normally be used in both cases. To avoid confusion in the current study, I have used 'NIS' for 'National Integrity System' and 'NI-Strategy' for the National Integrity Strategy of Bangladesh.

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- <sup>28</sup> Personal communication, 5 April 2016.
- <sup>29</sup> Personal communication, 3 January 2016.
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