

Open Ownership Strategy: From transparent to accountable ownership

2022-2025

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Vision and mission

Open Ownership (OO) believes that the disclosure of information on the true owners of companies is an essential part of a well-functioning economy and society. Transparency over company ownership contributes to a better-functioning financial system and economy, both globally and within domestic economies.

Our vision is that governments, businesses, and citizens can readily access and effectively use accurate, complete, and high-quality information on the true owners of companies to achieve their goals, including reducing corruption and tax evasion, improving procurement, and creating a sustainable business environment.

Our mission is to work towards *accountable ownership*: we want to see a world where beneficial ownership (BO) data is available and well used by actors across diverse sectors and societies to improve accountability.

Executive summary

Evidence to date shows that beneficial ownership transparency (BOT) has huge potential to deliver a wide range of impacts – from improving investment climates, to deterring and holding accountable those abusing corporate structures to commit a range of crimes, including corruption, illegal fishing, wildlife trafficking, and other environmental abuses, and laundering their proceeds.

However, despite successful advocacy over the last decade for BO data to be made transparent or “open” – i.e. made available to the public – and over 100 countries making commitments to do so, implementation varies. When data is available, it is often hard to use and may contain insufficient details or be of questionable accuracy.

In our strategy for 2022–2025, we are seeking to bridge these gaps in implementation and data quality, and our goals are framed around the concept of accountable ownership. To deliver widespread benefits, BO data needs to be accessible, accurate, complete, and well structured, and it needs to be used by a wide range of actors – domestically and internationally. That is why we developed the [Open Ownership Principles](#) (OO Principles): to bring together the key features required in order to maximise the chance that BO data can be used to deliver impact.

This strategy will see OO work to put the OO Principles into practice across three key areas:

1. supporting implementation of BO reforms to make more BO data available;
2. catalysing the use of BO data; and
3. producing research and advocacy to maximise impact beyond our direct work.

This strategy seeks to achieve concrete progress towards three strategic outcomes:

1. more and higher-quality BO data is available to stakeholders in governments, companies, and civil society;
2. more locally-relevant guidance, tools, and evidence on the implementation and impact of BOT are available and used by stakeholders; and
3. governments, businesses, and civil society use BO data and reforms to achieve their goals.

A changing global context

The global political argument that BO data should be first disclosed to authorities and centrally collected has largely been won. This is evidenced by the recent changes to the proposed Financial Action Task Force (FATF) Recommendation 24 – a significant shift towards requiring centralised registers of BO – which leaves little room for alternative approaches to central collection. It is also shown by the passage of new legislation in the United States (US) to require central federal disclosure of BO information.

However, as recognised by most actors, the implementation gap on even these limited ambitions is significant. What is more, the broader gaps in knowledge and implementation of approaches to ensure accurate data (most commonly referred to as “verification”) remain significant. In addition, there is further work to be done to ensure that BO data is effectively used both inside and outside government to reduce corruption currently enabled by poor oversight of company ownership.

Globally, the COVID-19 pandemic continues, and its impact will be felt throughout the coming years. In this context, accountable company ownership means ensuring that the global response is not further hindered by corruption, waste, fraud, and business practices which endanger health. This approach is strengthened by the new FATF Recommendation 24, which states that countries should ensure public authorities have timely access to BO information on legal persons during the course of public procurement processes.

The accelerating transition to sustainable energy sources is another important global policy shift. It creates an additional need to maximise public revenues from the extractives sector, both in the wind-down of fossil fuels and the scaling-up of the mining of critical minerals needed for clean energy technologies. It is vital to embed BOT into renewable energy value chains.

Whilst these developments have shifted the rhetoric regarding the necessity of tackling the problems caused by poor accountability in company ownership, the delivery of reform on BO is lacking, and this is stopping it from fulfilling its potential to support global governance. To overcome this, we see three core objectives for the global community in the coming years, and our strategy outlines the role we wish to play in supporting them.

Core objectives for the global beneficial ownership transparency community

1. **Collective action** is required from the global community of BO reformers to ensure effective and context-sensitive implementation of BO commitments and to deliver an ecosystem of high-quality data across a critical mass of countries.

Open Ownership's role

We will continue to intensively support the 15 countries where we are actively engaged as well as supporting other countries working through specific implementation issues through our technical [helpdesk](#). We will share the knowledge and learning we have gained from supporting implementation in vastly different jurisdictions worldwide to ensure that all organisations sharing in this collective goal can play their part to support delivery, including advocacy, campaigning, and technical advice.

2. **Robust new evidence** is needed to advance debates on issues such as balancing privacy and public access, and the mechanisms required to ensure the quality and integrity of data held in BO registers.

Open Ownership's role

We will provide robust new evidence, gathered through implementation work and thematic research (verification, cost-benefit analysis, the value of BO data in other policy areas, etc.), which will evidence best practice in high-quality data collection and structuring in BO registers.

3. **The use of data** needs to be scaled-up to realise the potential of BO reforms as a cornerstone of 21st century governance.

Open Ownership's role

Through the Opening Extractives programme and throughout our work, we will scale-up our data capability and deliver projects at a global, regional, and national level. Project reports will demonstrate that effective use is taking place and contributing directly to improved governance.

What Open Ownership will not do

We will not be the loudest or most public campaigning voice on any single BO issue. We exist to understand and share how to effectively implement BOT, and we will achieve this by being as close as possible to implementation by:

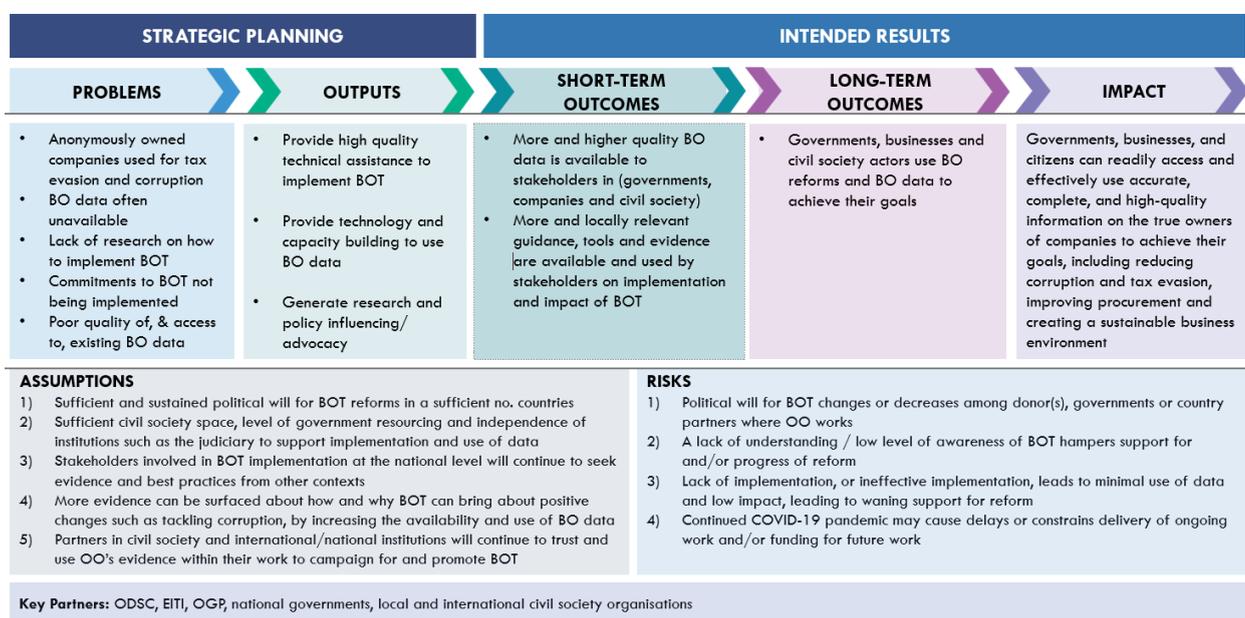
- delivering it in a small number of contexts;
- or providing sustained technical support to those that are doing the delivery; and
- disseminating the evidence persuasively to those who can deliver and support change.

It is our view that we cannot be both a campaigning organisation and simultaneously gain the kind of access we need to deliver meaningful learning that contributes to global knowledge. We wish to support those actors globally, regionally, and domestically who can play that role, and ensure that they are equipped with the very best and latest information on what effective reform looks like.

Strategic outcomes for 2022-2025

During 2022-2025, OO will work to achieve three interconnected outcomes (see diagram below). Together, these outcomes are designed to contribute to measurable impacts towards realising OO’s vision. Working in the relatively new and fast-evolving area of BOT means that our strategy needs to be flexible and adaptive. This strategy, therefore, sets out a framework to guide our work and provides some top-level targets against which we will measure our impact. It is, however, a living document and will be revisited regularly to allow us to adapt to new opportunities, challenges, and advances made in policy and technology.

OPEN OWNERSHIP: THEORY OF CHANGE



Short-term outcomes

Outcome 1: More and higher-quality BO data is available to stakeholders in governments, companies, and civil society

Over 100 countries have committed to BOT reforms, mainly during the last five years, yet to date, less than a quarter of these countries have fully implemented public BO registers. Analysis of the existing public BO registers identifies a number of problems concerning the quality of, and access to, data. If not addressed, and if repeated in other implementations, this will seriously impede data use and potentially lead to a backlash against BOT. Therefore, for BO data to be widely used to deliver impact, this implementation gap needs closing, and implementations need to result in higher-quality data than that which is currently available.

OO's work supporting implementation of BOT, plus the work of our partners globally in almost 40 jurisdictions, has identified that more knowledge is needed of what good practice looks like, and that this knowledge needs to be deployed in more BOT implementations around the world. Beyond the direct implementation support that OO will deliver, this knowledge needs to be shared widely throughout the community of national and international stakeholders that influence and undertake BOT reforms.

To meet these needs during 2022–2025, OO will:

- provide high-quality technical assistance to support governments to effectively implement BOT;
- generate a comprehensive body of research and knowledge about good practice in implementing BOT, working closely with implementers to test and refine this knowledge; and
- analyse the quality of published BO data in order to advocate for greater commitment to high-quality, impactful data publishing.

In addition to meeting the needs outlined above, OO recognises two further key factors that will influence the extent to which our interventions contribute to outcome 1:

1. there is a need across many countries (especially in low- and middle-income contexts) for increased sustainable funding for BOT reforms;
2. there is a need for greater capacity amongst national and international practitioners and consultants to support effective implementation.

OO will seek to influence both of these factors through the policy influencing work described under workstream 3. Additionally, under workstream 3, OO will share this knowledge with international actors and intermediaries that work directly with implementers, or who influence their behaviour.

Outcome 2: More locally-relevant guidance, tools, and evidence on the implementation and impact of BOT are available and used by stakeholders

BOT remains a relatively new policy area. Good practice is not yet widely understood, and global standards such as the FATF Recommendations are continuing to evolve. Significant opportunities exist during 2022–2025 to shape the ambitions and trajectory of how to implement BOT effectively, and why doing so across the world is so important.

The 2021 G7 summit reaffirmed the importance of BOT, highlighting its relevance to sectors beyond anti-corruption and money laundering, such as illegal wildlife trafficking. The movement towards BOT in the US, as showcased in the 2021 Summit of Democracy, has it well-placed to be an active champion of the cause. Indonesia's Presidency of the G20 in 2022 creates a further international platform to elevate BOT on the global stage, in particular due to Indonesia's recent commitments to BOT and its participation in the Opening Extractives programme, jointly delivered by OO and the Extractive Industries Transparency Initiative (EITI). The situation is not without its risks, however, and there remains a significant gap between countries leading the call for public BO registers and the less impactful ambitions of central, non-public registers or central registers with significant barriers to access and use (as have emerged across the European Union).

Globally and nationally, within key countries, there are strong civil society and business voices calling for an ambitious agenda of open public registers, however, there are limited concrete examples of successful implementation and resulting positive impacts. This has created space for pushback based on hypothetical and under-explored concerns. These concerns, such as infringement on privacy and

the perception of resulting personal risk to beneficial owners, often have a basis in reality; however, a lack of robust evidence means these arguments are deployed without being effectively challenged.

To support the achievement of outcome 2, there is a need for new evidence about the impact of effectively implemented registers that draws on real-world data and highlights the added value and impact of ambitious and effective implementation of public BO registers. This will be of greatest use if it highlights the relevance of BOT to policy agendas beyond anti-money laundering and the added value of effective implementation in different policy areas. These evidenced resources need to support the advocacy of OO and OO partners at critical points in the policy-making process maximising our impact and reach beyond countries that we directly engage with to provide technical assistance.

To meet this need during 2022-2025, OO will:

- produce new research, evidence, impact stories, and case studies to support effective implementation of BOT, and make the case for why it matters to influential stakeholders;
- develop and implement an advocacy strategy to engage key stakeholders throughout governments, multilateral institutions, civil society, and the private sector, either directly or via partner organisations.

Long-term outcomes

Governments, businesses, and civil society use BO data and reforms to achieve their goals

BO reform is still immature, and the processes and technology to support data collection, publication, and use are not well developed. For most users of BO data (aside from law enforcement agencies who may have a legal mandate to access BO data directly from companies or from closed registers), the only sources of data about the beneficial owners of companies are private sector databases. These are expensive to access, and due to the marketplace incentive to package together and sell diverse information drawn from multiple data sources, there is often a lack of clarity over the original sources and accuracy of the data.

Despite an increasing awareness of some general use cases, such as tackling corruption and money laundering, the capacity for actors in governments, civil society, and businesses to use publicly available BO data remains limited. This is either due to a lack of understanding of the potential of BO data for their work or technical challenges in cleaning, linking, and analysing the data.

These barriers need to be overcome in order for more governments, businesses, and civil society actors to make use of BO data within their work and demonstrate its value and efficacy. By increasing awareness among these groups of how BO data can help them to achieve a wide range of goals, as well as bolstering their capacity to understand how to harness available data, OO will drive widespread use of BO data. This, in turn, will help OO support compelling real-world cases of BO data use by governments, civil society, and businesses to add to the body of evidence about the impact and potential of BOT, and assist data users in understanding its potential.

To meet these needs during 2022–2025, OO will:

- build the capacity of key user groups to understand and use BO data;
- document and communicate specific use cases and examples of BO data being used to support key needs;
- provide new tools that help governments, civil society, and companies analyse and draw insights from BO data that meet specific needs;
- develop the Beneficial Ownership Data Standard (BODS) to a stable v1.0 and beyond, to give an international framework for publishing high-quality BO data which makes it easier to connect data from multiple sources or jurisdictions.

Open Ownership workstreams

OO organises its work through three main workstreams: technical assistance to implement BOT; technology and capacity to use BO data; and research and advocacy. These three workstreams contribute, to varying extents, to all three outcomes.

Workstream 1: Technical assistance to implement beneficial ownership transparency

What Open Ownership will do

Building on OO’s track record of providing technical assistance to almost 40 jurisdictions with aspects of BOT implementation, OO will provide targeted support and quality assurance throughout each stage of the process of implementing BOT. We will work directly with national government agencies that are responsible for implementation and engage holistically with local and international stakeholders across and outside of government to ensure that reforms are well understood and supported, and that they respond to the needs of data users. Depending on the opportunities in each context, this will include full economy central BO registers as well as work in specific sectors, such as extractives and procurement.

Why Open Ownership is well placed to do this

At this point in the development of BO reform globally, the most effective way for OO to drive effective implementation is to continue to develop our knowledge by directly supporting implementation, i.e. learn by doing. This ensures that OO will remain well placed to produce the most up-to-date, evidence-based guidance on best practice that can be widely deployed. To give us the best chances of supporting locally-owned, sustainable, and effective reform efforts, we need to meet implementers where they currently are and tailor our support to meet the political, economic, policy, and technology contexts where we work. As more countries progress along the implementation journey, we expect that more of our work will focus on the later stages of implementation (e.g. design and development of systems, verification, and use) during 2022–2025.

Our approach will continue to be holistic, and it will become inclusive of a wide range of potential data users. This engagement gives us the best understanding of how to deploy our expertise to benefit each context and promotes sustainable reform that meets local needs.

Workstream 1 activities 2022-2025

1. Provision of expertise to countries to work through specific implementation issues, provided through the OO helpdesk

The OO helpdesk describes the services that OO can provide to support implementers of BOT and actors supporting reform. This work falls into two categories:

- **Brief tailored responses to all queries received.** OO will provide a basic response to all queries that we receive, whether those are addressed to individual team members or come via our support@openownership.org inbox. At a minimum, our response will share relevant OO resources relevant to the query.
- **More detailed responses, or responses to multiple queries from actors in the same jurisdiction.** OO expects to continue receiving an increasing number of queries from BOT implementers, many of which would require several days of work to address in full. We will prioritise more detailed responses to queries where we judge that our response can achieve one or more of the following:
 - a. support more effective implementation in that context (outcome 1), including considering how much influence the agency asking the query has over implementation;
 - b. lead to examples or case studies that we can use to influence BOT regionally or globally (outcome 3);
 - c. enable OO to learn useful information about a particular implementation issue that helps us improve guidance or tooling for other implementers (outcome 1);
 - d. help us develop new relationships in priority countries where OO has limited engagement, or give OO a better sense of potential technical assistance needs and opportunities (outcomes 1, 2).

2. Sustained and tailored support to 15 countries progressing their implementation of BOT

Above and beyond the helpdesk support outlined above, OO will provide sustained support – envisaged to be six months or more, to 15 countries that are deemed to be high priority in the context of advancing OO’s strategy.

We will select countries that meet (or partially meet) the criteria laid out below, based both on “top down” discussions with international partners and donors to identify potential opportunities, and through “bottom up” discussions that take place through the course of our helpdesk provision.

This level of assistance will normally be defined through a memorandum of understanding or similar arrangement with the lead implementation agency, and will typically include a scoping assessment;

stakeholder and contextual analysis; provision of bespoke research; technical and policy support; and sustained engagement with multiple in-country actors and relevant international partners.

Such work enables OO to develop a deep understanding of BOT implementation in the specific context and offers more substantive opportunities to influence progress towards effective implementation. It is, however, resource-intensive and therefore OO will only undertake sustained support to a small number of countries during any one year. We will regularly check the extent to which countries receiving sustained support continue to meet the criteria below. Through our organisational monitoring, evaluation, and learning (MEL), we will collect and analyse information that allows us to decide if and when to move countries between sustained support and repeated helpdesk support.

Criteria for provision of sustained support:

- a. there is high-level political will and commitment to reform;
- b. there is a concrete need for OO’s technical expertise, and implementers are receptive to partnering with OO throughout implementation;
- c. implementers are keen to contribute to international dialogue and communications about BOT, for example, by championing BOT internationally, or sharing their experiences of implementation at a technical level with other countries;
- d. where OO’s work is likely to support meaningful advances in the availability of BO data (i.e. can we work with the implementer to get them to the point of *publishing* new – or improved – data?).

In addition, we will prioritise countries where there are opportunities for OO to learn something new about implementation that will help us advance BOT in other contexts, for example, enabling OO to develop deep knowledge across all the nine OO Principles.

During 2022–2025, OO will deliver the final three years of the Opening Extractives programme, and consequently a significant proportion of our sustained support to countries will focus on technical assistance that supports the implementation of BOT in resource-rich countries. The process for selecting countries to participate in Opening Extractives used a set of indicators that align with the above criteria, with the additional lens of seeking to achieve positive impact on natural resource governance.

Workstream 2: Technology and capacity to use BO data

What Open Ownership will do

We work with governments, civil society, and companies to develop technology that uses BO data to actively reduce corruption risks and improve governance. We have developed BODS, which enables the publication of structured, linkable BO data, and the Open Ownership Register, which demonstrates this with real-world BO data for nearly eight million companies, and allows anyone to download and analyse the data.

We will undertake new work to encourage actors to use BO data. Under Opening Extractives, we will provide direct support to actors to use BO data within specific projects that aim to improve natural resource governance. We will also provide training to people and organisations (including governments) wanting to understand and use BO data. Through this, we can test how much further OO could advance this work: is it mainly important to provide good examples to show that BOT is

impactful, or is there a more substantive need to support data use to ensure that progress does not stop at transparency and continues to deliver actual benefits?

Why Open Ownership is well placed to do this

Technology is, and must continue to be, a core part of OO's offer. OO's support fills gaps where commercially market services do not yet offer effective solutions. By providing technologies such as the BODS as free, open-source material for the public good, we aim to transform the availability of structured BO data around the globe, going beyond the implementation support we provide directly to countries.

BODS, which distils our current policy and technical knowledge into a data schema and accompanying documentation, acts as a guide for the collection, storage, and sharing of high-quality, structured BO data. We will continue to test BODS with country implementers, refine it in response to feedback, and share learning across policy and technical aspects of reform. Working with the community of users, we will ensure that BODS evolves to incorporate and provide ways to model the frontier issues faced by implementers worldwide.

We will advocate for the benefits of open, structured BO data as exemplified in BODS by working with governments and standard-setting authorities to further the adoption and acceptance of BODS as the de facto open global BO standard. It was adopted as the official standard of the United Kingdom Government in March 2022, and it is being proposed by many actors in the field to the US Government for their consideration and adoption.

The Open Ownership Register is used to collate, link, and analyse BO data where it is freely available. It has had real success in demonstrating the benefits of structuring and linking BO data, however, it has not become the widely-used product that was originally envisaged by OO's founders. For this reason, in 2019, we made the decision to move the focus away from being an end-user product and instead using the Register to analyse and understand BO data in the real world.

This technological expertise, coupled with extensive policy engagement across global and national contexts (see workstreams 1 and 3) places OO exceptionally well to deliver targeted and innovative capacity-building. We support users across governments, civil society, and the private sector to better use BO data within their work. To date, this work has remained quite nascent, since relatively little BO data exists publicly; however, as more data becomes available we will scale up our work with data users to promote effective use of the data.

Workstream 2 activities 2022-2025

1. **Build the capacity of governments, civil society, and companies to understand and use BO data, and develop new tools that allow them to do so**

During 2022-2025, OO will increase its focus on supporting the use of BO data. This work will comprise:

- supporting the publication of interoperable, structured BO data in BODS format, primarily through the Open Ownership Register;

- working with current and potential BO data users across government, civil society, and the private sector to document and communicate specific use cases and examples of BO data being used to support specific outcomes;
- developing tools and technologies that meet these user needs, prioritising technology that is unavailable in the market, is not responding to well-articulated user needs, or is not delivering effective implementation;
- analysing the quality of published BO data in order to drive greater commitment to high-quality, impactful data publishing.

The best way we can understand what effective implementation and use of BO data looks like is to ingest and use the data created and published around the world. In line with the OO Principles, which set the standard for effective BO disclosure, we will analyse newly published sources of BO data to determine the quality of the information released.

We will use these analyses to drive greater awareness of, and adherence to, the OO Principles as well as increased knowledge of BODS. We will publish the findings of detailed data explorations to surface issues arising from new BO data sources and make recommendations for improving data quality and interoperability. This will drive a virtuous cycle of data publishing, checking, validation, and use. Where data quality allows, we will demonstrate how to manipulate and work with BO data in order to incorporate it into data workflows, or how to explore it using open-source tools to demonstrate new use cases.

2. Develop BODS to a stable v1.0 and beyond

We will develop BODS, ensuring that it is used and remains a useful guide for the export and sharing of high-quality BO data within and across jurisdictions. We will support countries who are delivering against the OO Principles to accelerate their progress using our technical knowledge and expertise, whether or not BODS is the standard of choice for exporting data.

OO will develop a transparent and participatory governance system for BODS, consisting of a maintenance and support process; detailed documentation; and a defined policy for version management. It will incorporate and represent the views of the range of people and institutions which use BODS. This will give the surety and certainty to our partners that BODS is a robust, well-maintained, and flexible standard which they can rely on when looking for an open standard to incorporate into their systems and BO disclosure workflows. Having stable features which are well documented, created in line with user requirements, and based on real-world insights will help make the case for wider adoption of BODS and, in turn, will drive the production of higher quality, interoperable BO data.

Workstream 3: Research and advocacy

What Open Ownership will do

OO's research and advocacy work is twofold. First, aims to influence policy and practice at the national level for countries to whom OO provides technical assistance. Second, aims to contribute to raising international BOT standards by influencing key policy and standard-setting bodies and other influential international actors. In order to do this, OO will develop an advocacy strategy that will inform which resources we will produce and with which stakeholders we will engage.

OO will build the evidence base and produce the guidance and resources that will help local stakeholders implement effective BOT reforms. It will do so by collecting evidence of implementation and impact from its country work, guided by and informing the OO Principles, and sharing this knowledge and evidence with other national level stakeholders. OO's focus will continue to be across the overall BOT implementation journey, with a specific focus on dependencies between different aspects of implementation (e.g. how choices at the legislative stage impact the data that is collected). We will also focus on specific frontier issues (e.g. potential risks from publication in conflict-affected states and the effects of BOT on gender equality and inclusion) and other implementation challenges (e.g. public limited companies and state owned enterprises).

Compared to research and policy work to date, OO will more proactively identify a need for new evidence and knowledge to meet the advocacy strategy and ongoing feedback from OO's country implementation team. We will produce resources that are more attuned to implementer demand and actively identify opportunities for deploying these resources at critical moments in the policy-making and implementation process. Doing this will require an improved understanding of what motivates specific implementers to implement effective BOT reforms, how these reforms are implemented, and what their impact is.

An improved understanding of what motivates specific implementers and the role of key international actors in championing and mainstreaming BOT will guide the second stream of research and advocacy work. This will focus on highlighting *why* effective implementation of BOT reforms is important to different policy areas, and collecting and sharing evidence of its impact.

Research into *how* to implement BOT and *why* doing so effectively is important underpins OO's work at national level (Theory of change, outcome 1) and informs the development of tools and technologies to use data (Theory of change, outcome 3). It is also a key mechanism through which OO can influence change across the world, by informing international standards and practices on BOT, and influencing the practice of intermediary organisations and consultants that support BOT implementations around the world (outcome 2). OO will determine, either directly or through partners, where we have the capacity to meaningfully engage, deploy, and share the research outputs that are produced for this purpose.

Why Open Ownership is well placed to do this

OO has a strong track record of producing high-quality research and policy outputs. This includes the OO Principles; a number of policy briefings supporting the Principles; and research on BOT in the context of key topics such as procurement and trusts. These outputs contribute to the evidence base on BOT and address some of the questions frequently posed during national implementation. As a result, OO has become established on the international stage as an expert on BOT, with a reputation as technical experts (in the broadest sense) rather than campaigners. We want to continue to be the leading global experts for BO implementation; as a small team, this is how we can multiply our impact beyond the direct work we undertake to support implementation and the use of data.

OO cannot be the expert in each facet of implementation (e.g. OO is not best placed to draft BO laws in each country) but it does, and can continue to have, the best holistic view of different facets of implementation (data, legal, policy, systems); the dependencies between these facets; and how they influence the overall quality and utility of the data.

OO also has an opportunity to become more of a resource for the increasing number of actors supporting BOT reforms and their implementation. To do this, we must better understand and influence relevant international decision-making cycles. This will inform how we externalise our thinking and share evidence and incisive policy and practice recommendations in the right places to

the right audiences. It will also inform where OO should engage by itself and where it should do so through international and national partners.

Workstream 3 activities 2022-2025

1. Developing policy recommendations and detailed guidance on implementing effective BOT reforms

Focusing primarily on implementing countries identified under workstream 1, we will produce research and policy outputs that respond to the demand of country-level implementers. This means continuing to produce policy briefings for all the OO Principles to finalise our overall policy framing. We will also produce more detailed guidance on issues as they emerge, with a specific focus on dependencies, prioritised according to implementer queries and assessments of data of publishing countries (e.g. certain gaps in initial Latvia data suggest there are some issues in legislation, policy, and guidance).

This activity should also test whether our recommendations are leading to the expected outcomes in practice. This will require implementing a MEL framework that assesses the impact of OO's policy framing (the OO Principles). This will likely focus on different data users and different policy aims. Part of the MEL framework will also focus on understanding the key reasons and motivations for implementers to implement BOT reforms for impact rather than for compliance, which will feed into the following workstream 3 activity.

2. Understanding and articulating the importance and impact of BOT in different policy areas

Based on a combination of evidence gathered from workstream 1 and desk research, this activity will produce outputs that highlight key policy applications of BO data (tax, national security, possibly environment/fishing/vessels) to key audiences identified through our advocacy strategy at national and international levels. This will include producing impact stories and case studies of countries that have effectively implemented BOT reforms. Highlighting different policy use cases and the potential impact of BOT reforms implemented well contributes to the Theory of change outcomes 1 and 2.

3. Global knowledge sharing and advocacy

We will help raise international standards by providing standard-setting bodies with necessary evidence on the potential value of the implementation of effective BOT reforms (activity 2) and how this can be done (activity 1). During 2022, we will define the focus of our international advocacy work within the advocacy strategy, driven by OO's pre-existing and planned research outputs, and analysis of specific opportunities to influence global policy stakeholders. This will explore how OO can use relationships with key global stakeholders to build the capacity of the many actors (including those that actually deliver BOT implementation, such as national information technology companies and consultants) who provide technical assistance on BOT implementation. Finally, we will support civil society organisation coalitions working on BOT reforms at national and international levels by sharing OO's outputs and knowledge based on opportunities they identify.

How we resource our work

The financial resources required annually to achieve this are laid out below:

Item	Estimated cost
Maintaining technical support, research, and learning in 10 Opening Extractives countries	USD 1.25 million
Development of BODS to v.1 and maintaining its development	USD 300,000
Research and MEL (staff costs and external contracting)	USD 350,000
Maintaining the Open Ownership Register (long-term decision on this functionality pending)	USD 125,000
Core country implementation team (including two additional staff members)	USD 600,000
Staffing (leadership team and all support staff)	USD 400,000
Administrative costs (including fiscal sponsorship)	USD 300,000
Total cost per annum	USD 3.32 million (GBP 2.4 million)