



Beneficial ownership disclosure

# Technical assistance with implementation

Services and tools for  
governments implementing  
beneficial ownership reform



# About Open Ownership

## Good governance through transparent company ownership

Open Ownership (OO) helps countries generate high quality data on company ownership that complies with international standards and meets the needs of data users across government, civil society, and the private sector.

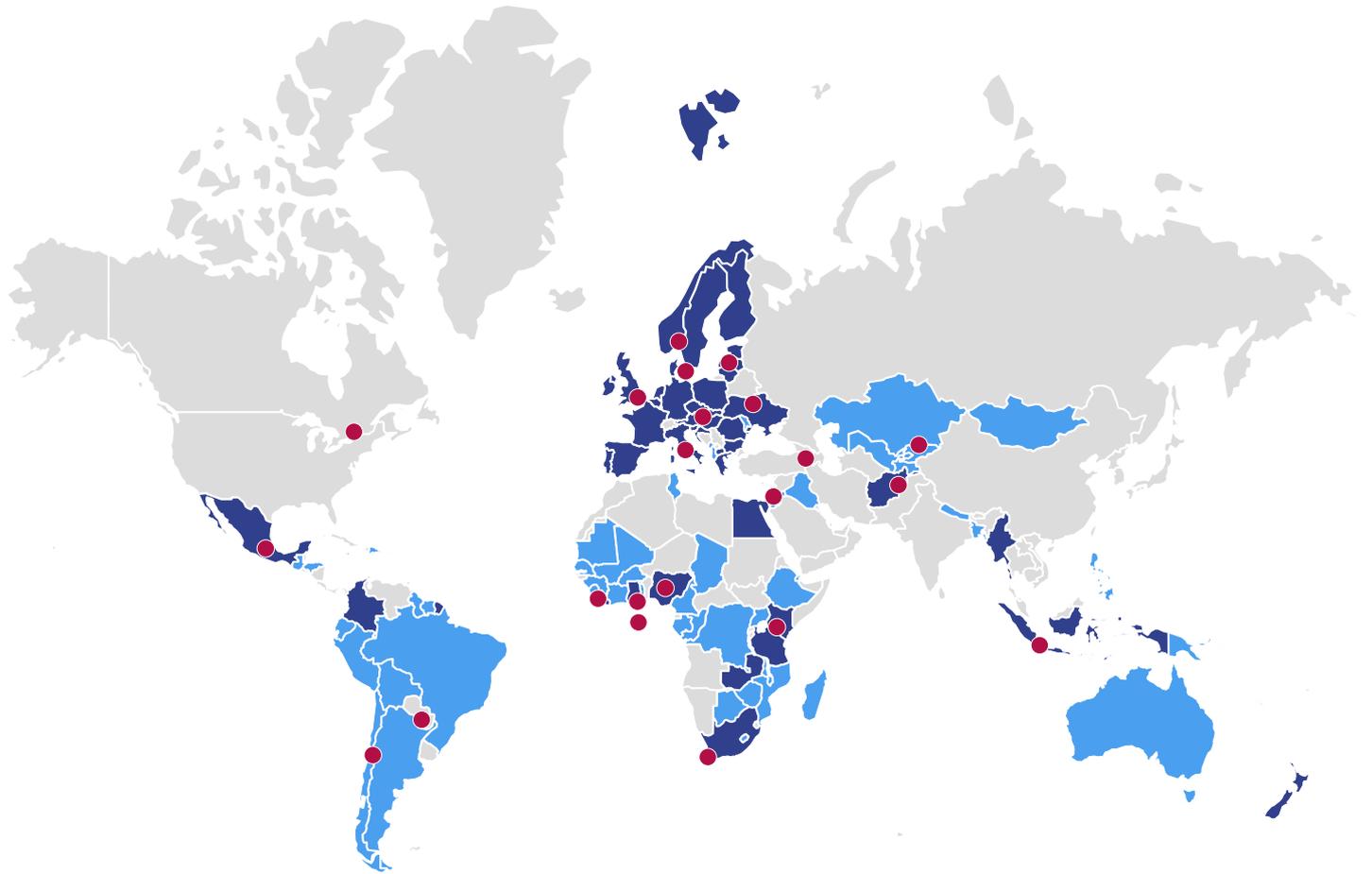
Since 2017, OO has worked with almost 40 countries to advance implementation of beneficial ownership (BO) reforms and support the creation of over 15 new central and sectoral BO registers. We have developed the world's leading [data standard](#) for BO information, co-founded the international [Beneficial Ownership Leadership Group](#), and built the world's first [transnational public BO register](#).

Our team of policy and technical experts, based across three continents, provides technical assistance to governments to collect, compile, and publish data on who ultimately controls the companies operating in their jurisdiction. We engage directly with implementing agencies and work closely with multilateral country offices and donor funded projects to leverage our knowledge and expertise.

OO works with key international stakeholders with an interest in BO disclosure, including the International Monetary Fund, the World Bank, the Financial Action Task Force, the World Economic Forum, the Open Government Partnership (OGP), and the Extractive Industries Transparency Initiative (EITI), as well as bilateral and foundation donors. OO is a member of the [Global Coalition to Fight Financial Crime](#), co-founded by Europol, World Economic Forum, and Refinitiv.



**Figure 1. Map showing countries committed to beneficial ownership transparency (BOT) and where OO is engaged**



**35** countries where OpenOwnership is engaged (includes 14 British Overseas Territories)

**47** countries are fully committed to BOT

**58** countries are partially committed to BOT



# Technical assistance services

OO provides technical assistance with all aspects of implementation, as well as advice to governments that are considering BO reforms. OO takes a collaborative, tailored approach, working with governments and their in-country partners to develop support packages that fit their needs.

OO offers tiered levels of donor and partner funded technical assistance to support specific implementation areas and facilitate end-to-end implementation of BO reforms. This is complemented by a suite of freely-available guides, templates, and tools that set out emerging best practice in creating effective registers and useful BO data.

## End-to-end: Implementation support and quality assurance

OO's team of technical and policy experts provides expert guidance, support, and quality assurance throughout each stage of implementation. From central registers to open data portals, as well as sectoral interventions for EITI compliance or procurement reform, our team can assist at each stage. The OO team can support with developing and reviewing legislation and regulations, developing forms and business processes to collect data, designing and building technical systems to store and publish, and analysing and using the resulting data.

OO's support is framed around the [Open Ownership Principles](#) (OO Principles). The OO Principles distil good practice on BO disclosure from around the world, breaking down the nine elements that underpin effective disclosure. By implementing the OO Principles, countries will build a comprehensive picture of who owns companies in their jurisdiction, unlocking the potential of BO data to reduce corruption, ensure that all businesses know who they are working with, and encourage sustainable inward investment.

OO's delivery is flexible and collaborative, working with implementing partners to understand their policy drivers for reform; creating support packages to meet these goals; and supporting timely and practical actions to implement BO disclosure within the policy goals and constraints of each national context.

### Case study: Armenia

In 2019, Armenia enlisted OO's support to implement the country's commitments to beneficial ownership transparency (BOT), made through OGP and the EITI.

OO's technical and policy experts worked closely with officials in the Ministry of Justice, the Prime Minister's office, the state business registry, and the EITI Secretariat to scope out the steps needed for effective implementation. This was distilled into a [scoping report and recommendations](#), providing solid targets for specific aspects of reform.

Based on the findings, OO is working with the Ministry of Justice and the EITI Secretariat to deliver a set of targeted activities to implement the recommendations. To date, this has included reviewing legislative amendments for Armenia's central BO register; developing disclosure forms; inputting to technical specifications for new software to collect and store BO data; providing technical support to publish data to the Beneficial Ownership Data Standard (BODS); and reviewing the first declarations published under Armenia's extractives BO register. During the next phase of work, OO will assist the Ministry of Justice and state business register to sensitise stakeholders to the reforms, make further legislative amendments, and collect and publish BO data for companies operating in all sectors of the economy.



## Assistance with BO reform in key sectors

OO's team has substantial experience in supporting implementation of sector-based BO disclosures, such as those required by the EITI, and BO reforms targeted at critical sectors, such as procurement. Our technical and policy experts can assist with end-to-end implementation or provide input to particular implementation issues relevant to sector based BO reform.

### Case study: Indonesia

During 2020, OO has been supporting Indonesia to accelerate their use of BO data in procurement and build a foundation for longer term improvements to their BO disclosure regime. Working with the Ministry of Law and Human Rights (MLHR) and project partners, OO developed a series of prototype systems showing the potential for connecting BO data with contracting information. We are now working with stakeholders from multiple ministries to drive demand for MLHR's data across government, aiming to embed BO data in multiple business processes. Our team has also reviewed MLHR's technical systems, producing simple, practical recommendations that can be immediately implemented to improve data quality and interoperability with the Indonesian central procurement data.

## Targeted projects and implementation support

OO's team can provide time-bound, targeted support with particular implementation issues or in order to meet a specific implementation milestone. Our support spans the full implementation process, from early policy development through to analysis and use of data.

Examples of the services we offer at each stage are given below.

### Policy development

As governments explore how and whether to undertake BO reforms and consider international commitments through fora such as the OGP, OO can provide a variety of services to address early implementation questions and make the case for effective reform.

#### Example services

- guidance on the key elements required for effective BO disclosure, and information on global good practice;
- facilitation of stakeholder consultation on proposed reforms;
- advice and support drafting commitments to BO reform;
- support to identify key considerations for implementing BO disclosure.

#### Key OO resources

- [The case for public beneficial ownership registers \(briefing\)](#);
- [Early impacts of public registers of beneficial ownership: Slovakia \(case study\)](#);
- [Effective consultation processes for beneficial ownership transparency reform \(briefing\)](#).

### Case study: South Africa

South Africa is in the process of drafting the country's fourth OGP National Action Plan. A key priority is to build on the country's 2016 BOT commitment. Working closely with the Financial Intelligence Unit and Corruption Watch (TI-SA) in 2020, OO has identified specific and implementable steps to incorporate in the new commitment.



## Legislative and regulatory reform

OO provides a range of information and technical assistance to support the development of an effective legal and regulatory framework for BO disclosure.

### Example services

- review of current or proposed legal framework for BO disclosure;
- detailed analysis and input to specific draft legislation/regulation;
- modelling the potential impact of draft legislation/regulation on accuracy and use of BO data.

### Key Open Ownership resources

- [Beneficial ownership in Law: Definitions and thresholds \(briefing\)](#);
- [Data Protection and Privacy in Beneficial Ownership Disclosure \(report\)](#);
- [Beneficial Ownership Policy Reviewer \(tool\)](#).

### Case study: Kyrgyz Republic

In 2018, following Kyrgyz Republic's commitment to establishing an extractives sector BO register, the State Committee for Industry, Energy, and Subsoil Use enlisted support from OO to develop the legal framework for disclosure. OO worked closely with the EITI and with in-country lawyers to develop regulations covering the collection and publication of BO data, based on findings from our [scoping study](#). OO provided expertise throughout the drafting process, attending meetings with government officials as well as mining company and civil society stakeholders to explain the rationale behind the requirements in the regulations and share examples of international good practice. The regulations were subsequently adopted, giving the State Committee for Industry, Energy, and Subsoil Use the mandate to collect and publish BO data for extractives companies operating in the Kyrgyz Republic.

## Systems, software, and business processes

OO provides information, guidance, and tools to assist implementers in developing BO registers, along with other information systems and business processes that enable BO disclosure.

### Example services

- support with developing technical specifications for BO registers and other digital systems to enable disclosure;
- mapping and review of existing systems and technologies for disclosure of company information;
- support to develop business process and information flows for effective collection and use of BO data.

### Key Open Ownership resources

- [Beneficial Ownership Data Standard \(BODS\) data schema and documentation](#);
- [BODS Data Review Tool](#);
- [Beneficial Ownership Visualisation System \(BOVS\)](#).

### Case study: Ukraine

Following the launch of the Ukrainian company BO register in 2017, users of the data identified issues with quality and usability. OO worked with the Ukrainian Ministry of Justice and the technical agency responsible for maintaining the register to conduct a detailed [scoping assessment](#), specifying the weaknesses and proposing measures to improve. Throughout 2018-2019, OO worked closely with the Ministry of Justice and technical agency to implement improvements, including through developing a new digital system for the register that launched in 2020.



## Data collection and verification

OO provides advice and practical support to implementers to identify what information should be collected as part of BO disclosure, to develop forms to collect the data, and to establish verification processes to ensure the data is accurate.

### Example services

- review of draft BO declaration forms;
- advice on fields of information to collect;
- support to devise and implement effective data verification processes for BO data.

### Key Open Ownership resources

- [Verification of Beneficial Ownership Data \(briefing\)](#);
- [Example Forms for Collecting Beneficial Ownership Data](#).

#### Case study: Nigeria

In 2018, Nigeria's Corporate Affairs Commission (CAC) enlisted OO's support to develop effective data collection forms for BO information. Throughout 2018-2019 OO worked with staff at the CAC and local stakeholders to review and input to successive drafts of the disclosure forms, and to model the BO data that forms would elicit. During 2020, the forms have been used as the basis for the CAC's software to collect the country's first BO disclosures.

## Publication and sharing of BO data

OO supports implementers with all aspects of data publication and sharing.

### Example services

- advice on technical approaches to publishing or sharing BO data;
- review of published BO data to identify strengths and areas for improvement;
- assessment of BO disclosure system against the OO Principles.

### Key Open Ownership resources

- [the global Open Ownership Register](#);
- [BODS data schema and documentation](#);
- [rapid assessment of The UK's performance against the Open Ownership Principles](#).

#### Case study: Latvia

In 2020, staff at Latvia's Register of Enterprises were preparing to publish BO information conforming to the BODS. Companies were already submitting information, and systems analysts at the Register had questions about how to represent ownership and controlling stakes that were held by beneficial owners via other people. These might be trust arrangements, an adult controlling a child's assets, or some other, undeclared arrangement. OO worked with a Latvian analyst at the Register to understand the scope of the issue. The forms used to submit declarations were shared and OO examined them, aiming to understand the types of relationships being disclosed and what information about them would be known. We were then able to offer a modelling solution to our Latvian colleague, enabling them to confidently publish meaningful, usable data about how control and ownership of a company can flow through multiple hands.

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