

2013 Global Consultation and Review Process

Advisory Group Recommendations and Considerations Report

October 16, 2013

Executive Summary

The Institute for Multi-Stakeholder Initiative Integrity (MSI Integrity) Advisory Group presents this report summarizing the feedback from the 2013 Global Consultation and Review Process, and delivering considerations and recommendations to the Board of MSI Integrity. The considerations and recommendations in this report reflect the comments received during the consultation and review process, as well as the combined experience and perspectives of the Advisory Group members. The Advisory Group members include: Greg Asbed, Brad Brooks-Rubin, Deval Desai, Alexandra Guáqueta, Mariëtte van Huijstee, and Tu Rinsche. Adam Greene and Steve Hitov were originally involved in the Advisory Group and contributed to early meetings, but were unfortunately unable to contribute to the drafting of the report due to the demands of external commitments.

The Advisory Group believes that MSI Integrity is a valuable and much needed initiative, and the comments received during the public consultation and review process reflect similar enthusiasm throughout the field. The consultation and review process comments and feedback indicate support for MSI Integrity's goals to: (1) understand the impact of multi-stakeholder initiatives (MSIs) on human rights, (2) evaluate the design of MSIs to identify structural elements that are important for MSIs to protect and promote human rights as defined in their scope and mandate, and (3) engage as an independent organization with MSIs and stakeholder communities to learn how MSIs can improve human rights impacts.

The Advisory Group broadly agrees that the methodology and standards proposed by MSI Integrity are sufficient and appropriate to conduct rigorous evaluations of the human rights impact of MSIs. The Advisory Group advises MSI Integrity to continuously review and develop the methodology and standards in response to practical lessons learned through conducting evaluations, analyzing data and trends, producing evaluation reports, and engaging with MSIs, stakeholders, and external research. This consideration reflects the practical reality addressed in comments and Advisory Group deliberations that various methods and approaches could be followed to assess MSIs rigorously, and MSI Integrity has proposed a sufficient and appropriate approach that will benefit from practical learning and evolution over time.

The considerations and recommendations presented in this report are intended to reflect the general support for MSI Integrity and its proposed methodology and standards for evaluating MSIs, and identify recommendations and considerations based on practical experience from a wide range of stakeholder views represented at consultations and in the Advisory Group.

Overall, the tone of consultation meetings and comments was very supportive of the evaluation tool, methodology, and standards proposed by MSI Integrity. Key themes arising in consultation meetings and comments addressed: MSI Integrity continuing to develop its evaluation tool over time, incorporating the experience from conducting evaluations and analysis; and, MSI Integrity building on its engagement and learning mission as a resource for MSIs and interested stakeholders by

developing other research and informational products to expand knowledge regarding MSIs. The Advisory Group notes several broad themes in comments and deliberations over considerations and recommendations. Recurring themes for the Board of MSI Integrity to consider include:

- MSI Integrity is embarking on a challenging mission in a diverse, complex, and rapidly shifting field. Institutional measures for ongoing internal and external review, development and evolution of MSI Integrity tools and approaches should be carefully observed to ensure that MSI Integrity maintains rigorous methodologies and standards, and conducts independent and objectively justified evaluations. One proposed institutional measure is the development of a diverse, independent, and experienced Advisory Board to assist with organizational development and review over time.
- Comments received demonstrate the tension in choosing between MSI Integrity conducting highly standardized evaluations capable of providing comparative results across MSIs, versus conducting highly contextualized evaluations of each individual MSI. The Advisory Group recognizes that each approach has advantages and disadvantages. The Advisory Group acknowledges that MSI Integrity has justified the balance it has elected to follow and urges continuous reflection on the appropriateness of that balance over time, in response to ongoing feedback and data collection.
- Similarly, many comments showed strong encouragement for MSI Integrity to conduct on-the-ground impact assessments as soon as practical, while many other comments detailed the difficulty of reliably measuring human rights impacts on the ground. The Advisory Group believes that MSI Integrity should address these competing concerns by acknowledging the methodological challenges and continuing to engage a broad range of experienced practitioners, researchers, and diverse stakeholders to develop and test impact assessment methodologies in due course.

Overview of the Consultation and Review Process

MSI Integrity engaged in an official global consultation and review process from May 1 – August 31, 2013. The process involved in-person consultation meetings on six continents, and a public comment period that lasted the duration of those four months, with comments solicited from any and all interested actors. Amelia Evans, co-founder of MSI Integrity, attended each consultation meeting to explain MSI Integrity and answer questions relating to the standards and methodology.

Over 100 people participated in the worldwide consultation meetings or submitted individual comments for review. These participants represented views from: corporate social responsibility consultants, business, trade and labor unions, civil society organizations, non-governmental organizations, governments, national human rights institutions, international human rights organizations, MSIs, and academic researchers in fields such as law, business, and human rights.

Host institutions coordinated regional consultation meetings for MSI Integrity. These host institutions included the Netherlands Embassy (Washington, DC), the Center for Business and Human Rights at NYU Stern Business School (New York, NY), the World Bank (Washington, DC), the Center for Applied Legal Studies at Witwatersrand University (Johannesburg, South Africa), La Trobe University School of Business (Melbourne, Australia), the Law, Governance and Development Initiative at the Australian National University College of Law (Canberra, Australia), the Australian Human Rights Centre at the University of New South Wales Law School (Sydney, Australia), Jindal Global Law School (Sonipat, India), Jorge Tadeo University (Bogotá, Colombia), and the Netherlands Ministry of Foreign Affairs (Den Haag, Netherlands).

Overview of the Advisory Group Deliberation Process

The Advisory Group deliberated and drafted this report in September and October 2013. Each Advisory Group member read and reviewed the materials under review, the summary notes from consultation meetings, and the individually submitted comments. The group discussed and debated the comments during telephone and in-person meetings, and participated in drafting and editing this final report. The terms of reference for the Advisory Group is available on MSI Integrity's website.

Considerations and Recommendations

The following considerations and recommendations are organized based on the comment submission form questionnaire that many participants used to submit feedback to MSI Integrity.

I. Selection of MSIs for Evaluation

The Advisory Group supports MSI Integrity's proposal that it should have the discretion to select a range of MSIs for evaluation, and that this selection should represent MSIs that operate in different industries and address different human rights issues. Overall, the Advisory Group recognizes that the resources of MSI Integrity dictate that only a limited number of MSIs can be comprehensively evaluated. MSI Integrity is seeking to conduct rigorous evaluations of MSIs not just on their own terms but also with respect to: (a) their importance to a sector and to the field of MSIs as a whole; and (b) their actual or perceived importance and the nature of their claims regarding impact. As a result, the Advisory Group also recognizes the importance of MSI Integrity establishing a rigorous and effective process for selecting MSIs that matches the thoroughness of its assessment with the import of the MSI and/or the insight the MSI offers into the specific area of MSIs and human rights impact. In general, the Advisory Group would like to see more public clarity on the process by which MSIs are selected for evaluation, and supports some form of mapping exercise to identify existing MSIs and put individual reports in context. The Advisory Group also recommends MSI Integrity develop a Terms of Reference that outlines the scope of review of a particular MSI; this is discussed further in Section II.

Considerations for the Board of MSI Integrity:

• The Advisory Group suggests that MSI Integrity consider producing a descriptive mapping of MSIs, identifying them according to a range of factors, including: industry/sector, governance structure, the human rights implicated, and stage of development. This product should be public, refined in part by public response and engagement with MSIs, and regularly updated to reflect the global landscape of MSIs.

- The Advisory Group recommends that MSI Integrity publish a statement communicating the process by which it chooses MSIs to evaluate. This should include:
 - (a) Threshold criteria for evaluation, including factors such as:
 - Willingness to engage under the proposed Terms of Reference for an MSI Integrity independent evaluation. The Advisory Group advises that this is a particularly relevant factor for MSI evaluation selections in the early phase of MSI Integrity conducting evaluations, and can contribute to shared

understanding between the MSI and MSI Integrity of the mutual benefits arising from a thorough independent evaluation;

- Importance of the MSI to the industry or sector;
- Human rights implicated in the scope and mandate of the MSI;
- Governance structure of the MSI and its perceived or actual innovativeness compared to MSIs generally;
- Stage of development of the MSI;
- Availability of data (both qualitative and quantitative, and both public and private) on the MSI.
- (b) An open procedure for individuals, stakeholders, or MSIs to suggest appropriate MSIs to be evaluated.
- The Advisory Group recommends that each evaluation report on an MSI should include a section identifying the factors underlying the selection to assess that MSI. The absence of any factors listed above should not preclude a decision to evaluate an MSI, but the balancing of all factors should be clearly articulated by MSI Integrity.

II. Information Gathering Process in Evaluations

The Advisory Group notes the information-gathering process undertaken in the first round of MSI evaluations, which consisted of an initial stage of reliance on the MSI's public website, followed by engagement with MSI Staff and a stage of external review by two "experts"—one with experience related to the MSI under review, and the other with experience relating to MSIs and human rights generally.

The Advisory Group recognizes the difficulty faced by MSI Integrity in understanding and accessing the MSI's context, whether with respect to the operation of the MSI itself or the context of the industry and communities involved with the MSI. In many cases, the MSI's public website will not reflect either type of context, and the Advisory Group recommends that MSI Integrity consider how best to research, identify and incorporate contextual variables when undertaking a specific review, given how critical this information can be to understanding an MSI. This effort should take specific note of elements such as: practical industry realities, operational concerns, cultural circumstances, and the history, factors and parties involved in creating the MSI. Much of this contextual information may not be recorded on paper or placed on public websites. In some cases, the MSI itself may be able to identify critical information that is not published, and MSI Integrity should make a request for this data at the outset of an evaluation.

At the same time, the Advisory Group recognizes MSI Integrity's limited resources to conduct prolonged investigations into contextual variables, and the goal of promoting MSI transparency and accountability by using the publicly available information to reflect back to the MSI the information it is communicating to the public. Further, the Advisory Group recognizes that evaluation of publicly available information may help to identify possible gaps between an MSI's claims and its actual reports.

The Advisory Group acknowledges that MSI Integrity is itself in an early stage of development, and recommends that the process of gathering information should be continually reviewed and improved through experience. The Advisory Group endorses the potential positive impact of on-the-ground assessments by MSI Integrity to address the shortcomings of desk-based information gathering, but recognizes that such assessments can differ in scope and efficacy, drain resources, or, in some cases, compromise independence and legitimacy.

Considerations for the Board of MSI Integrity:

- The Advisory Group recognizes the critical role that on-the-ground assessments will play in connecting structural evaluations of MSIs with an understanding of their impact on human rights, and suggests that MSI Integrity should seek to gather a diverse, experienced and independent technical group to develop a protocol for a form of on-the-ground assessment to be conducted in the future.
- The Advisory Group suggests incorporating as wide a variety of resources as is practical to rigorously gather information, ranging from desk-based research to direct engagement with MSI Staff, publicly available information from the MSI, MSI members, stakeholder communities.

- The Advisory Group recommends that MSI Integrity clearly communicate to the MSI the information-gathering process and scope at the outset of the evaluation process, and do so through attempting to formalize a collaborative Terms of Reference, as mentioned in Section I, for engagement in the evaluation process. The Terms of Reference should specifically express:
 - (a) MSI Integrity's expectations and requests from MSI Staff in engaging and collaborating with the evaluation;
 - (b) The scope and process of MSI Integrity's evaluation, outside of collaboration and engagement from MSI Staff; and
 - (c) An expressed statement of the relationship established between MSI Integrity and the MSI under evaluation—clarifying that collaboration and engagement does not create a bilateral or consultative relationship, but is intended to offer an independent but fair, accurate, and representative evaluation of MSIs.
- The Advisory Group recommends that MSI Integrity clarify and publish the parameters for the use of two "independent experts" in the secondary review stage of the evaluation and report-writing process, including a clear definition of what constitutes "expert" for the purposes of this role.

III. Evaluation Methodology: Scoring Evaluations

The Advisory Group supports MSI Integrity's proposal of scoring MSIs. However, the Advisory Group believes more information is necessary to weight the categories of indicators and to be able to provide an overall score. The information that could be helpful in generating the weights includes both the research MSI Integrity will conduct into scoring over time, as well as consultations with experts. Challenges to address in determining score weightings include identifying through data collection what structures and practices correlate with positive impacts, and addressing statistical paradoxes where MSIs might "score" poorly in evaluations but positively impact human rights in practice. Consequently, the Advisory Group believes it is premature to provide a weighted overall score for MSIs.

In the interim, the Advisory Group recommends that MSI Integrity communicate scores by identifying the proportion of minimum standards met by an MSI. The minimum standards scores should be identified clearly and without weightings—perhaps by showing the raw fraction of minimum standards met under each category of standards evaluated. Additionally, the Advisory Group supports MSI Integrity's proposal of providing separate scores for affected community involvement and transparency.

Considerations for the Board of MSI Integrity:

 The Advisory Group suggests that MSI Integrity should employ simple, clear ways to communicate scores meaningfully in the interim as the weighting system for creating an overall weighted score is developed over time. Some form of band-based scoring system was considered by the Advisory Group, but concerns were raised that such a system could be overly simplistic, and may attach unintended value to outcomes on elements of the evaluation tool that do not reflect human rights impacting variables. Additional concern was raised that MSI Integrity should employ its resources most effectively to the gradual development of an overall weighted score, rather than bandbased/traffic-light style scores as an interim measure that may misrepresent outcomes.

- The Advisory Group recommends that MSI Integrity initially publish scores in the form of the raw numerical data representing the number of minimum standards met by the MSI in each standards category of the evaluation tool. MSI Integrity should publish the overall category scores (i.e., *Internal Governance*, *Transparency*, etc). Detailed scores for sub-categories (i.e., *Grievance Mechanism* under *Internal Governance*) should be published where they clarify substantial structural design characteristics.
- The Advisory Group recommends that in the future MSI Integrity should publish the MSI's overall score, derived by aggregating weighted scores from

each category. MSI Integrity should announce a timeframe for producing weightings and overall scores.

IV. Evaluation Methodology: Evaluation Reports

The Advisory Group supports the basic format and content of the reports, and believes that producing short-form reports will be beneficial to reach and inform a broader audience. The substance of the report is expected to focus on facts—detailing the structural design of the MSI and what minimum standards it meets or fails to achieve—and analysis—how or why the MSI is designed in this way, and what additional elements could improve its impact on human rights.

In particular, the advisory group appreciates that the reports include a lot of valuable detail and useful analysis of the evaluation results for the interested reader; however, they may be too lengthy for some audiences. Format adjustments, such as changing footnotes to endnotes, are suggested in order to make the substantive report length shorter. Report length is recognized as a benefit for providing in-depth analysis and content to audiences who need and will use it, but a detriment to engaging some audiences who do not have the time or resources to carefully review such a detailed report. The additional publication of a short form or summary report is anticipated to be valuable for quick-reference and for highlighting the key findings from each section of the evaluation-including any "good" and "innovative" practices followed by the MSI. Similarly, the MSI Integrity introduction to the reports-identifying MSI Integrity, communicating the parameters and purpose of the evaluations, and presenting trends, themes, strengths and weaknesses from the evaluations—is broadly anticipated to benefit policy-makers and observers of MSIs by extracting general lessons over time. The Advisory Group approves of this "executive summary" of the full range of reports being released, and reviewing the trends from current and past MSI Integrity evaluations.

The Advisory Group recommends that the relevant international human rights implicated or targeted by the MSI should be adequately identified and highlighted in both the long and short form reports. The compatibility of MSI standards with existing international or national legal standards is another area that some Advisory Group members feel should be noted in reports. Additionally, the Advisory Group discussed the importance of providing a space for the MSI to respond to the findings of the report, although the format of such a space was not discussed in detail. Finally, publication of the reports needs to consider translation of the reports into languages spoken where the MSI is located or has an impact.

Considerations for the Board of MSI Integrity:

• The Advisory Group encourages MSI Integrity to provide an opportunity for a direct response from MSIs in the evaluation report, and to clearly communicate to MSIs the manner of response they may expect to offer, as well as MSI Integrity's discretionary capacity over incorporating direct responses into the final evaluation report.

• The Advisory Group suggests that MSI Integrity continue to consider whether, when and how to open up reports to comments from MSI participants including members and affected communities. One option the Advisory Group discussed allowed for final reports to be commented on in a standard format and within a specific period of time. In this option, the report would be made public pending comments, and finalized once the deadline passes regardless of whether MSI participants had submitted comments.

Recommendations to the Board of MSI Integrity:

- The Advisory Group recommends that MSI Integrity clearly communicate in summary and long-form reports the particular human rights the MSI under evaluation potentially or actually impacts, and place MSI standards in context by explaining how they compare to existing international human rights frameworks, norms, or legal standards.
- The Advisory Group recommends shifting "footnotes" into "endnotes", to reduce the presented length of the substantive reports.

V. Minimum Standards: Appropriateness and Sufficiency

On the whole, the Advisory Group finds the minimum standards to be appropriate and sufficient to analyze the structure and functioning of existing MSIs, and to evaluate their capacity for effectively protecting human rights, recognizing that this is only the first phase of MSI Integrity's experience with these standards and that there will be a learning curve to MSI Integrity's own capacity for effective evaluation. Beyond that overarching caveat, the Advisory Group's recommendations and considerations focus on the level of strategic and implementation issues related to the Minimum Standards. The Advisory Group is comfortable with MSI Integrity continuing the role of assessing feedback on and adjusting individual standards as needed.

The Advisory Group believes that MSI Integrity should consider the sheer volume of standards that it has developed at this point in the process, attending to various potential negative impacts on the evaluation process that may arise from using such a high number of standards to assess MSIs initially. Some Advisory Group members were concerned that standards may set the bar too high for MSIs in different stages of development, while others were concerned that the standards were too inclusive for the wide spectrum of different contexts in which MSI's currently operate or could drift toward evaluation of the MSI's overall performance and functionality rather than its specific impact on human rights. Suggestions to address these challenges ranged from tightening the focus of the standards as they stand now, either by breaking them down further into groupings that are functionally distinct (e.g., key elements of structure versus good governance features) or shaping subsets of the standards to fit better the specific contexts of differing MSIs. The idea of weighting certain standards over others as a function of their importance to successful human rights outcomes was also raised, but the Advisory Group was reluctant to make any specific

recommendations at present because it feels the question of weighting standards should be addressed once MSI Integrity has more data to consider relating standards to impacts.

Considerations for the Board of MSI Integrity:

- The Advisory Group acknowledges that, consistent with comments, observers feel the minimum standards are too numerous, and suggests MSI Integrity regroup the minimum standards into sub-categories or distinct contexts to focus their application.
- The Advisory Group particularly notes that certain standards may need to be further emphasized, contextualized, or weighted in evaluations than others, once further data is gathered. For example, rights-holders' participation and education, market consequences or incentives for compliance, and other standards may be proven over time to have greater influence on human rights. This may vary by context, or stage of development of the MSI, and should be observed carefully by MSI Integrity in its review and development of standards and methodology over time.

Recommendations to the Board of MSI Integrity:

• The Advisory Group recommends MSI Integrity should review feedback regarding specific standards and either comply with comment suggestions or explain the justification for retaining any questioned standards in their current form.

VI. Evaluation Standards: Scope and Mandate Criteria

Overall, the Advisory Group values the scope and mandate criteria questions as a method for identifying the specific relation to human rights targeted by the MSI itself. There were a few types of MSIs considered, including those that: (a) targeted impact on all human rights, (b) targeted impact on a selection of one or more human rights, or (c) did not identify the MSI as targeting impact on any specific human rights. The Advisory Group was of the opinion that identifying the MSI's scope and mandate is a useful informative exercise, but should not be accounted for in evaluation scoring results. It is held that there is no clear indication that it is more likely an MSI positively impacts human rights. Even in those cases, such as the EITI and Kimberley Process, where the MSI does not specifically have a mandate regarding human rights, members of the Advisory Group believe that those initiatives are quite relevant to this policy realm and that to some degree their theory of change is related to improving conditions that would likely impact the protection and realization of human rights.

The process of identifying the scope and mandate of the MSI related to human rights was considered to be a useful tool to informing the stakeholders and interested observers of MSIs about their self-identified mandates—clarifying whether they are intending to capture full self-regulation of an industry, or if they are only intending to

capture one part of it. It can be additionally useful during the engagement phase, as MSI Integrity engages the MSI under evaluation to clarify its understanding of the human rights scope of its initiative. Finally, specific changes to the wording and framing of the scope and mandate criteria were suggested to aid clarity and better capture the intended meaning of the criteria.

Considerations for the Board of MSI Integrity:

• The Advisory Group generally believes that including MSIs without a direct human rights mandate is acceptable, provided that MSI Integrity is careful to report this important contextual information and justify the relevance of human rights to the history and context of the MSI (see *I. Selection of MSIs for Evaluation*). MSI Integrity has already addressed these issues in relation to evaluations of the Kimberley Process and Extractive Industry Transparency (EITI), which are in the draft report stage.

Recommendations to the Board of MSI Integrity:

- The Advisory Group recommends the following minor adjustments:
 - (a) The bullet point identifying that MSIs evaluated members on compliance with human rights should be clarified so that it expresses that MSIs generally evaluate compliance with human rights—not that they evaluate members for compliance.
 - (b) That the final bullet point that MSIs "fully" utilize a rights-directed scheme drops the term "fully" as "utilizes" adequately expresses the point.

VII. Assessment Methodology and Long-Term MSI Integrity Planning

The Advisory Group believes that MSI Integrity fills a much-needed gap in datacollection, evaluation and understanding of MSIs and their impact on human rights. Overall, the Advisory Group agrees that one of the long-term objectives of MSI Integrity is to have the capability to evaluate and communicate the effectiveness of an MSI's actual impact on the particular human right that is being addressed by the MSI. Questions posed to the Advisory Group pertained to the proposed methodology for evaluating MSIs and whether the proposed evaluation tools are appropriate. The Advisory Group finds that the proposed evaluation tools currently developed are sensible and in the right direction; however, they need to be further developed and a number of considerations and challenges need to be addressed before MSI Integrity moves toward measuring impact on the ground.

Other topics and questions discussed involved identifying short-, medium- and longterm objectives of MSI Integrity, how to maximize or best use MSI Integrity's current resources and expertise and establishing MSI Integrity's organizational foundation to sustain the current work streams and support additional activities. While assessing an MSI's human rights impact on the ground is an important long-term goal, a number of concerns were raised on the feasibility of such an undertaking and the resources that will be required to accomplish activities. Instead of moving forward with carrying out impact assessments immediately, suggestions were made for MSI Integrity to focus on strengthening its current products, building credibility and expertise, expanding existing activities to offer guidance for parties interested in creating or reforming an MSI, and solidifying the organization's social and financial networks.

Considerations for the Board of MSI Integrity:

- Feasibility of carrying out impact assessments: The Advisory Group feels that MSI Integrity needs to establish a credible foundation first in order to "get it right" in developing a research methodology for impact assessments. At first, MSI Integrity should consider expanding into a desk-based research +plus model, which would allow MSI Integrity to better understand impact through interviews and some qualitative research relating to testing the evaluative findings in reports.
- Role of MSI Integrity: The Advisory Group feels that the niche for MSI Integrity may be to build products that engage stakeholders and encourage the improved infrastructure and integrity of MSIs building off of the understandings learned from data produced in desk-based research. The initial evaluations can be used to inform MSI Integrity's valuable potential role to develop and provide guidance to others seeking to form, or reform MSIs to improve how they address human rights issues. As a knowledge-sharing resource for MSIs and stakeholders, MSI Integrity should focus on learning and engagement. Specifically, MSI Integrity could produce reports relating to specific elements of MSIs and how they impact human rights. These efforts should ultimately provide a benefit to existing MSIs themselves as well as to stakeholders discussing future MSIs and the public.
- Stakeholder engagement and outreach: The Advisory Group feels that MSI Integrity should plug into existing and developing networks of stakeholders familiar with "social auditing" and its challenges in order to learn how to design better on-the-ground impact assessment methodologies over time. MSI Integrity can pair its own work with the knowledge gained through this engagement and outreach to identify best practices in research and impact methodologies and MSI development. It is imperative that impact assessment methodologies learn from other processes, including "social auditing" and its failures or challenges.
- Sustainability: The Advisory Group agrees that some form of impact assessments should be the ultimate goal for MSI Integrity, but the order of operations in expanding MSI Integrity's activities should reflect a sustainable institutional development path to allow for the platform to build reliable impact assessment methodologies. In terms of organizational expansion, MSI Integrity should plan to maintain a small staff and utilize partnerships with

academic institutions, governments and NGOs, and should zealously guard the independence of MSI Integrity through careful sourcing of funding and planning of products, programs and partnerships.

- The Advisory Group recommends that MSI Integrity take care to develop the methodology, including baseline tests, surveys, and pilots, before carrying out on the ground impact assessments. In the interim, the Advisory Group recommends developing the methodology and related tools over time, while producing existing products and developing the organizational foundation to support credible impact assessments.
- The Advisory Group recommends that MSI Integrity establish financial security through a broad donor base with appropriate (non-corporate) social, research and implementing partner institutions.