



NON-GOVERNMENTAL ORGANIZATIONS' PARTICIPATIONS AND TACTICS IN KURDISTAN REGION'S COMMISSION OF INTEGRITY LAWMAKING



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ABSTRACT

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The NGOs' role in policymaking is identified in the developed countries. Nevertheless, in the developing nations the role is not investigated properly. More importantly, the NGOs' tactics (insider and outsider) in the developing countries' literature unidentified systematically. Therefore, since the NGOs influenced the **Kurdistan Parliament Commission of Integrity Law No 3 (2011)**. This paper attempts to investigate the NGOs' role in the law deliberations, to examine how NGOs participated in the law deliberations, and what tactics were used to influence the Kurdistan parliament. Accordingly, the study employed qualitative case study research design, and the data collected through face to face in-depth interview with 15 respondents including NGO members, parliament members, and experts. The interest groups theory adopted to analyze the NGOs' tactics and to compare the interest group theory's tactics with the Kurdistan NGOs' tactics. Consequently, the paper found that the anti-corruption NGOs participated in law drafting, engaged in lawmakers' meetings, organized conferences and workshops, and audited parliamentary bill deliberations. Besides, the paper also found that the anti-corruption NGOs used insider and outsider tactics during their participation in the law deliberations. They have used partnership with lawmakers, presenting research results, writing letters and consultations, law drafting, training, and meeting with parliament members as insider tactics. Meanwhile, lobbying and media campaign were used as outsider tactics. The paper also declared that the Kurdistan NGOs used almost the same tactics which have been discussed in the interest group theory's literature.

Contribution/ Originality: The paper contributes to the existing literature by investigating the NGOs' role in the law deliberations, to examine how NGOs participated in the law deliberations, and what tactics were used to influence the Kurdistan parliament.

1. INTRODUCTION

The **KPCILN3 (2011)** has been enacted by the Kurdistan parliament in early 2011 (Kurdistan Parliament, 2018). The law is considered as one of the significant anti-corruption policy changes in the Kurdistan region. Recently, the commission played important role in tackling corruption in the region. Several corruption cases were registered in the commission's court and several corruption reports have been published by the commission of integrity (Kurdistan Commission of Integrity (KCI), 2016). Since the commission's law has been enacted, the anti-corruption NGOs were participated and influenced the commission of integrity's law deliberations. The major issue in this paper is to investigate the NGOs role in the commission of integrity's law deliberations. Since the NGOs

participated and influenced the commission of integrity law deliberations, their roles are not been investigated yet. The way NGOs participated in the law deliberations are not clear. Besides, the tactics which were used by the NGOs to influence the lawmakers are not explored and analyzed so far. On the other hand, the lack of NGOs' literature in context of developing countries is identified as another problem in this paper. The NGOs' tactics in the developing nations remained understudies. The current NGOs' tactics in the developing countries needed to be categorized. Developed countries' literature is categorized the interest groups' tactics to influence the policymakers (Silva-Leander, 2015; Anzia, 2017). The insider and outsider tactics systematically categorized in the developed countries' literature as well (Gais and Walker, 1991; Elliott-Teague, 2007; Miroff *et al.*, 2014; Anzia, 2017). However, such an identification is not classified accurately in the developing nations (Elliott-Teague, 2007; Anzia, 2017) especially in the Kurdistan region. Therefore, this paper attempts to answer the main question in this research which is; how NGOs participated in the commission of integrity's law deliberation and what tactics were used by the NGOs to influence the lawmakers during commission's law deliberations. For the purpose of achieving logical and coherence research techniques, in this paper qualitative case study has been adopted to answer the study research question. The KP (2018) has been adopted as a case study in order to investigate the NGOs' role. Face to face interviews were conducted with 15 respondents among them 4 parliament members, 7 NGOs and 4 experts. The purposely selection technique has been used to select the study population. The parliament members and the NGOs were selected based on their participation in the commission of integrity's law enacting process and the experts were chosen to evaluate the NGOs' participation in the law deliberations. Semi-structured questions were used in the interview process to collect the required data. The collected data transcribed and coded through using computer software named Nvivo version 10. Thus, themes and sub-themes were developed in the data analyses process. The outcomes are discussed and interpreted for findings and future recommendations.

2. REVIEW OF LITERATURE

Participation in policy process usually emphasizes on two types of actors which are individual and interest group actors. In developed countries, the interest groups and individuals are considered as actors who participate in policy process. Many scholars believe that interest groups such as NGOs are crucial and needed to be consulted in the policymaking process (Booth, 1994; Nelson, 1995; Clarke, 1998; Fisher, 1998; Lewis, 2001; Silva-Leander, 2015; Anzia, 2017). In contrast, others believe such groups' participations prevent democratic outcomes (Elliott-Teague, 2007). In order to clarify the argument, this study reviewed the interest group theory's literature in order to understand the interest groups role in policymaking process. The theory states that the interest groups are crucial to be consulted and engaged in the policymaking process. The theory also mentions that such a participation is significant to the functioning of democracy and to develop a valuable policies. Moreover, the theory argues that good policies depend on the active participation of interest groups, particularly NGOs (Baumgartner and Leech, 1998; Martini, 2012; Silva-Leander, 2015). Additionally, when interest groups participate in policymaking, they may influence governments to become more accountable and transparent (Martini, 2012; Anzia, 2017). One of the biggest supporters of this view is international funder organizations. Recently the international donors' programs required governments to participate greater groups. Such donors contributed to the development of the countries particularly developing countries. However, some of them funded to implement their political agenda especially in weak democratic countries (Haynes, 2007; Kaufmann *et al.*, 2015). Thus, the paper established that groups still significant to be involved in policymaking process and such view is confirmed in the developed countries NGOs' literature. The role of NGOs in public policymaking significantly acknowledged in the developed countries' literature.

In developing countries interest groups particularly, NGOs engaged in development of governments, in areas such as education, environment, poverty, women, and children. However, there is lack of literature concerning interest groups especially NGOs' participation in policymaking in developing countries, particularly anti-

corruption and political policies (Elliott-Teague, 2007; Martini, 2012; McCormick, 2014; Silva-Leander, 2015). Moreover, the tactics which were used by NGOs to influence public policies or policymakers are also unclear in developing countries. Little studies are conducted regarding NGOs participation in policymaking in such countries. One of the few is the Public Choices and Policy Change, by Thomas (2001). They collected data from twelve case studies of policy changes in developing countries. They realized that the interest groups particularly NGOs had little or no roles in policymaking in such countries, probably because they were weak or in other cases there were no NGOs. They argued that, interest groups' pressure is crucial in policy making. However, in developing countries such pressure groups were non-existent formally, instead the groups performed informally.

Furthermore, another two studies were conducted recently in Indonesia and Tanzania. Both focused on the role of NGOs in policy making in areas; anti-corruption, land, environment and women rights policies. Silva-Leander (2015) study considers as a significant contribution to the body of knowledge. She conducted a study regarding the role of NGOs in anti-corruption policy changes in Indonesia. She concludes that the NGOs in Indonesia have used several tactics to influence policymakers. They protested to pass the anti-corruption law on time, and they participated in parliamentary deliberations. Besides, they have used media, social mobilization, public opinion, drafting law, collaboration and technical assistance as a tactic and strategy to influence policymakers. Consequently, the anti-corruption NGOs succeeded in influencing the legislators to pass the Indonesian anti-corruption law (Silva-Leander, 2015). However, she only focused on the role of NGOs in legislative policies, while she neglected NGO's roles in executive authority. Additionally, in Tanzania the NGOs' role mentioned significantly particularly in influencing public policies. However, in several cases they failed to influence the policymakers and policy process. Elliott-Teague (2007) concludes that, NGOs in Tanzania lobbied and campaigned to influence women land law, environmental law, and NGOs law. They influenced the land act and the NGOs law, however, they failed in influencing environmental law. According to him, the NGOs used several tactics to influence the policymakers. Similarly, Elliott-Teague study only focused on legislative authority to investigate the NGOs role, while executive policies almost neglected in his study. This study believes that the NGOs can influence both legislative authority and executive authorities. As in developed countries, NGOs are divided into two types, those who interested in influencing parliamentary authority and others are interested in influencing governments (Elliott-Teague, 2007; Anzia, 2017). This categorization is needed to be studied in developing countries as well.

Moreover, developed countries' literature is established insider and outsider tactics which have been adopted by the NGOs to influence the policymakers. Walker (1991) identifies the law drafting, the partnership with policymakers, presenting research results, conducting conferences and workshops, writing letters and consultation as insider tactics. Besides, lobbying, protesting, and media campaigns are declared as outsider tactics by Walker. The insider tactics mostly used by the interest groups compare to outsider tactics in developed nations (Elliott-Teague, 2007; Anzia, 2017). Such a classification has not been acknowledged in the developing countries' literature. Silva-Leander (2015) analyzed the tactics which have been used by the Indonesian NGOs to influence the parliament. Nevertheless, she didn't mention about insider and outsider tactics and even she didn't establish which type is being used by the NGOs in Indonesia. Similarly, Elliott-Teague (2007) he classified the insider and outsider tactics in his research about NGOs in Tanzanian environmental policymaking. Nonetheless, he didn't state which type is mostly used by the Tanzanian NGOs. Thus, studies needed to be conducted in the developing nations in order to identify the insider and outsider tactics. Accordingly, this paper aims to investigate the tactics which have been used by the anti-corruption NGOs in the Kurdistan commission of integrity law. It also attempts to identify the insider and outsider tactics to fill the mentioned gaps. Thus, the study significantly contributes to the developing nations' body of knowledge, since the role of NGOs and the NGOs' tactics lack discussed in such countries' literature.

3. DISCUSSION OF RESULTS AND FINDINGS

The paper divided discussion part into two parts which are; discussion on the findings of the NGOs' participation in the Kurdistan commission of integrity law, and discussion on the findings of NGOs' tactics to influence the parliament to participate in the commission of integrity's law deliberations.

3.1. *Ngos' Participation in the Law*

In Kurdistan region's parliament, the civil society organizations have the right to participate in law deliberations. According to the parliamentary regulations, the relative organizations such as NGOs may participate in law deliberations in several areas including; law drafting, auditing, participating in committee meetings, writing letters, and presenting conferences and workshops (KP, 2018). Accordingly, the anti-corruption NGOs have been engaged in the law deliberations. The study respondents mentioned that the NGOs participated and influenced the parliament and lawmakers during the Commission of Integrity's law deliberations. Thus, the study found that the anti-corruption NGOs participated in the following areas:

- i. Drafted the commissions' law.
- ii. Participated in the lawmakers' meetings.
- iii. Written proposals and letters to lawmakers.
- iv. Audited the commission's law deliberations.
- v. Organized workshops and conferences.

One of the significant NGOs' participation in the commission of integrity's law deliberation was drafting the law. The finding revealed that the NGOs have drafted the commission of integrity's law and submitted to the Kurdistan parliament. Hence, the draft was considered as a significant role of the NGOs in the commission's law deliberations. The paper discovered that the anti-corruption NGOs have submitted three drafts to the Kurdistan parliament during the commission's law deliberation process. They have proposed the draft because they noted that there was a lack of anti-corruption law in the Kurdistan region to fight against corruption. Meanwhile, the level of corruption in Kurdistan region was high and the region was suffering from the lack of anti-corruption laws and institutions. Therefore, the anti-corruption NGOs influenced the Kurdistan parliament to enact a fighting corruption law to establish an institution for tackling corruption. Besides, the lack of parliament members' experience in anti-corruption law drafting, also imposed the anti-corruption NGOs to propose an anti-corruption draft.

Law drafting by interest groups is widely discussed in the developed country's literature (Elliott-Teague, 2007; Silva-Leander, 2015). Besides, several studies conducted in the developing countries regarding the interest groups' law drafting. The literature established that, the interest groups, especially NGOs may draft laws and strategies to the governments or parliaments. For instance, in Indonesia, the anti-corruption NGOs played a significant role in enacting anti-corruption law in the parliament. They have drafted an anti-corruption law to parliament and influenced parliament to adopts the law draft (Silva-Leander, 2015). Similarly, in Tanzania, the environmental NGOs drafted an environmental law for the parliament and they influenced the Tanzanian parliament to enact the law to reduce environmental pollution. Further, the Tanzanian NGOs drafted the land and women law to the Tanzanian parliament and they influenced parliament to pass the law (Elliott-Teague, 2007). More importantly, the interest groups theory established that the law drafting is one of the most significant NGOs' participation in enacting laws and formulating strategies in developed countries. Law drafting is considered as an insider influence tactics in the interest group theory. The theory mentioned that, the interest groups may draft policies such as laws, regulations and strategies to governments or parliaments (Rush, 1990; Smith, 1993; Riddell, 1998; Page, 1999; Smith, 1999; Grant, 2005; Elliott-Teague, 2007; Silva-Leander, 2015).

Another NGOs' participation in the law, was attending the parliament committees' meetings. The paper revealed that the anti-corruption NGOs involved in the parliament committees' meetings during the process of the

commission of integrity's law deliberations. Clearly, NGOs participated in the committees' meetings to influence the parliament members to accept their demands and the drafts. According to the informants, the NGOs involved in the legal, financial, and civil society committees' meetings to influence the lawmakers to accept their demands. However, based on the parliament regulations, the civil society organizations have no right to express in the parliamentary bill discussions during the parliamentary deliberations. Therefore, they met the parliament committees' to influence the parliament members to accept their demands. The study discovered that the NGOs attempted to convince the lawmakers to accept several articles which were important to be included in the commissions of integrity's law.

Previous studies established that the meeting with policymakers is one of the NGOs' participation in the policy formulation. More importantly, the literature revealed that the civil society organization, particularly NGOs participated in the policymakers' meetings to influence them to accept their demands. The interest group theory concludes that the interest groups may participate in the law or strategy formulation to influence the policymakers to accept their demands (Arons and Berry, 2003; Grant, 2005; Elliott-Teague, 2007; McCormick, 2014; Silva-Leander, 2015). Meanwhile, the developing country's literature also established that the NGOs participated in the government policymakers' meetings to influence them to accept their demands. For instance, Uganda's NGOs participated in the government policymakers' meetings. They have been involved in the policymaker's meetings regarding the agricultural loans, soil and water conservation policies. They have also contributed to the Validation Workshop for the National Fertilizer Policy (McCormick, 2014). Similarly, Indonesian anti-corruption NGOs influenced the parliament members' meetings during enacting the anti-corruption law. They have participated in parliament meetings to influence them to accept their anti-corruption draft (Silva-Leander, 2015). Further, since the environmental law enacted in Tanzania, the environmental NGOs participated in the parliament members' meetings (Elliott-Teague, 2007).

Writing letters to lawmakers also considered as one of the other NGOs' participation in the commission of integrity's law deliberations. The paper revealed that the NGOs have written letters to the parliament members to participate in the commission's law deliberation. Most of the informants generated that, the anti-corruption NGOs submitted their demands and law draft through sending formal letters to the Kurdistan parliament and parliament committees. Meanwhile, the NGOs drafted the law, they have submitted their draft through formal letters. Besides, during the law formulation, the anti-corruption NGOs involved in the process by writing letters to policymakers. Most of the informants mentioned that the anti-corruption NGOs participated in the commission's law deliberations, they have provided their experiences and other countries' expectancies in terms of fighting corruption in the form of writing letters to the lawmakers. They have submitted letters which contained their notification and demands about the law. Thus, writing letters considered as a significant NGOs' participation in the law deliberation as mentioned by the informants.

Moreover, the law auditing, conference and workshop hearing were other NGOs' participations in the commission's law deliberations. Since the law deliberated, the anti-corruption NGOs audited the parliamentary deliberations. They have participated in the parliamentary discussions as auditors to monitor the process and to report the process to other civil society organizations and the public. The study revealed that the anti-corruption NGOs audited the parliamentary deliberations to monitor the process and to defend their demands. However, according to the Kurdistan parliament regulations, those who participate as monitors they have no right to speak or express. Therefore, as mentioned by informant 5, nevertheless, time didn't provide for the NGOs to speak in the parliamentary deliberations, but they have used their cellphones to send SMS to the parliament members. He further stated, the anti-corruption NGOs send their opinion regarding the law articles to the parliament members through SMS. The findings demonstrated that the NGOs have used the cell phone in the parliamentary deliberations in order to advise the parliament members regarding the law articles in the parliamentary bill.

Holding conferences and workshops was another NGOs participation in the commission of integrity's law deliberations. The findings illustrate that the anti-corruption NGOs held several workshops and conferences regarding the commission of integrity's law. Since the law deliberation started, the anti-corruption NGOs organized several workshops for the parliament members to train them about the anti-corruption law drafting. They have held workshops in neighboring countries to share other countries experiences regarding such a law. According to the interviewees, several significant workshops have held in the Kurdistan parliament to clarify the process of enacting the commission's law and to discuss NGOs' anti-corruption draft which was submitted by the NGOs. Thus, the paper discovered that the parliament members benefited from NGOs' workshops. More importantly, in the workshops, the NGOs discussed and shared successful anti-corruption experiences in other countries and they explained their draft and demands. Accordingly, the anti-corruption NGOs significantly participated in the law deliberations, since they have organized several workshops and conferences to train the lawmakers and aware them about other countries' successful experiences.

Previous studies in developed and developing countries also revealed that the interest groups, particularly NGOs significantly involved in policymaking by holding conferences and workshops. Meanwhile, holding conferences and workshops considered as an important participation in the policymaking process in developed countries (Elliott-Teague, 2007; McCormick, 2014; Silva-Leander, 2015). Besides, such workshops and conferences have also been provided by the developing countries NGOs as well. For instance, in Uganda holding workshops widely used by the NGOs in land and degradation policymaking. The civil society organization, particularly NGOs held several workshops for the policymakers regarding the land and degradation policy in Uganda (McCormick, 2014). In addition, Tanzanian NGOs organized several workshops and conferences during the environmental and women land law deliberations. For instance, in Tanzania, a workshop held by the NGOs about National Land policy, in the workshop; parliament members, government officials, members of the private sector and NGOs' representative were involved (Haynes, 2007). Moreover, the Indonesian anti-corruption NGOs' coalition has held a conference during the anti-corruption law deliberations, in the conference, they have concentrated about their demands and their anti-corruption draft (Silva-Leander, 2015).

In conclusion, since the Kurdistan region's parliament enacted the commission of integrity law No.3, the anti-corruption NGOs have participated in the law deliberations. They drafted the commission's law; written letters to the lawmakers; participated in the parliament committees' meetings to concentrate on their demands and law draft; they have audited the parliamentary deliberations; and they held several workshops and conferences to train parliament members and to share other countries' successful experiences. Accordingly, the anti-corruption NGOs significantly participated and involved in the commission of integrity's law deliberations. Importantly, the findings revealed that the Kurdish NGOs participated the same as NGOs in developed and developing countries participated in policymaking process. Moreover, the way NGOs involved in the commission of integrity's law deliberations are explained in the interest group theory's literature.

3.2. NGOs' Tactics in the Law

The anti-corruption NGOs influenced the Kurdistan commission of integrity's law deliberations. They were used several tactics and strategies to influence the lawmakers and the parliament. The paper revealed that the anti-corruption NGOs have used outsider and insider tactics to influence the parliament. According to the informants, the anti-corruption NGOs have adopted seven insider tactics, including; meeting with lawmakers, training, drafting legislation, partnership with lawmakers, presenting research results, writing letters to lawmakers, and alliances. Meanwhile, they have used two outsider tactics which are media campaign and lobbying. According to the findings, the tactics have been adopted based on the types of influences to have a significant effect on the parliament. For instance, informants 1 and 2 stated that the NGOs used international agencies as a lobby to influence parliament members because the NGOs realized that the Kurdistan authorities concern about international agencies and

international reports (informants 1 & 2 NGOs). Therefore, they have used United Nations representative and the countries' consulates to influence the parliament to accept NGOs' demands. Furthermore, the media is one of the significant statics which usually use by NGOs to influence the policymakers. Accordingly, the anti-corruption NGOs organized a media campaign to influence the lawmakers. According to the informants 1, 2, and 7 the media campaign organized because the Kurdistan parliament attempted to delay enacting the law (informants 1, 2, & 7, NGOs). Thus, the anti-corruption NGOs organized a media campaign to influence the Kurdistan parliament to enact the law on time. More importantly, the anti-corruption NGOs have used law drafting during their influences on the parliament as mentioned by informants 1, 2, 7, 8, 10 and 11. They have submitted the law draft to parliament. informants 1, 2, and 7 which are NGO members stated that they adopted this tactic because they realized that there was a lack of anti-corruption law and anti-corruption institution in the Kurdistan region. consequently, the paper revealed that the NGOs have used insider and outsider tactics to influence the lawmakers during commission of integrity law deliberations.

The interest group theory's literature concluded that the NGOs have used outsider and insider tactics and strategies to influence policymakers in developed countries. In such countries, interest groups such as NGOs have used insider and outsider tactics to influence policymakers (Gais and Walker, 1991; Elliott-Teague, 2007; Miroff *et al.*, 2014). In the United States, the interest groups significantly used the insider and outsider strategies to influence the policymakers (Berry, 1977a; Wlaker, 1991; Baumgartner *et al.*, 2009; Wolton, 2016). Similarly, in the United Kingdoms, the NGOs have used almost the same tactics and strategies which have been used by the United States' NGOs (Grant, 2005; Maloney *et al.*, 2017).

Meanwhile, the NGOs have used tactics to influence the policymakers in the developing countries. However, insider and outsider tactics have not identified properly. Elliott-Teague, 2007 mentions that the Tanzania groups, particularly NGOs have used almost the same tactics and strategies which have been used by the developed countries' NGOs. However, in Tanzania NGOs more interested in insider tactics rather than outsiders. Similarly, in Malaysia, the environmental NGOs have used indirect (outsider) and direct (insider) tactics when they influenced policymakers. Mohd and Lee (1999) mention that in Malaysia the NGOs have used the insider (direct) and outsider (indirect) tactics when they attempted to influence the environmental policy. Besides, the Indonesian anti-corruption NGOs influenced the Indonesian parliament to enact the anti-corruption law to fight against corruption. Thus, they have used insider (direct) and outsider (indirect) tactics and strategies to influence the lawmakers (Silva-Leander, 2015). However, in Uganda, the NGOs more involved in direct (insider) influence to impact the policymakers (McCormick, 2014). The Table 1 shows the NGOs tactics in developed and developing countries compare with the NGOs' tactics in the Kurdistan region.

The table illustrates that the Kurdistan NGOs have used almost the same tactics as used by developed and developing countries' NGOs as discussed in interest group theory. However, some tactics which have been used by developed and developing countries were not used in the Kurdistan region. For instance, agenda sittings, working with influential citizens and planning strategy have been adopted by developed countries and Kurdistan NGOs, but such tactics have neglected in developing countries. Meanwhile, filing suits or amicus briefs, protests or demonstrations, and influencing appointment, adopted in both developed and developing countries, but such strategies not been used in the Kurdistan region. Although, drafting by request and doing a favor for officials were used by the developed countries' NGOs, but such tactics were not used in developing countries including Kurdistan region. Accordingly, the Kurdistan region, NGOs have used almost the same tactics and strategies which have been used by the developed and developing countries' NGOs as discussed in the interest group theory's literature. The anti-corruption NGOs in Kurdistan have used insider and outsider tactics to influence the policymakers. Thus, almost the same tactics have been used by the anti-corruption NGOs in the commission of integrity's law deliberations.

Table-1. Interest Group Theory's Tactics comparison with Kurdistan Region NGOs' Tactics.

Tactics and strategies	Developed countries	Developing countries	Kurdistan region
Participation in Ministry workshops	Y	Y	Y
Testimony at legislative hearings	Y	Y	Y
Testimony at agency hearings/workshops	Y	Y	Y
Direct or informal contact with legislators	Y	Y	Y
Direct or informal contact with officials	Y	Y	Y
Presenting research results	Y	Y	Y
Working with other groups	Y	Y	Y
Planning strategy with government officials	Y		Y
Talking to journalists	Y	Y	Y
Making paid advertisements	Y	Y	
Drafting legislation by request	Y	Y	
Drafting legislation by NGO initiative	Y	Y	Y
Drafting regulations by request	Y		
Shaping policy implementation	Y	Y	Y
Serving on advisory commissions	Y	Y	Y
Agenda-setting	Y	Y	Y
Letter-writing or telegram campaigns	Y	Y	Y
Working with influential citizens	Y	Y	Y
Alerting legislators to district effects	Y	Y	Y
Sharing policy information with district citizens, NGOs, and/or local officials	Y	Y	Y
Filing suits or amicus briefs	Y	Y	
Campaign contributions/ work	Y	Y	Y
Protests or demonstrations	Y	Y	
Policy monitoring	Y	Y	Y
Influencing appointments	Y	Y	
Doing favors for officials	Y		

Source: Developed from the study.

4. CONCLUSION

The paper revealed that the anti-corruption NGOs participated in the commission of integrity's law deliberation in five areas including; law drafting, participating in lawmakers' meetings, auditing parliamentary discussions, and organizing conference and workshop. Moreover, the paper discovered that the NGOs have used several insider and outsider tactics and strategies to influence the policymakers. The NGOs used several insider tactics such as meeting with lawmakers, training, drafting legislation, a partnership with lawmakers, presenting research results, writing letters to lawmakers, and alliances. Meanwhile, they have used two important outsider tactics which are media campaign and lobbying. Thus, the paper concludes that the anti-corruption NGOs contributed and participated in the commission of integrity's law deliberations. They have drafted the law, involved in the lawmakers' meetings, organized workshops, and monitored the parliamentary bill deliberations. Besides, the paper also concludes that insider and outsider tactics have been used by the NGOs' to influence the parliament members in the commission's law deliberations. More importantly, the paper established that the anti-corruption NGOs in the Kurdistan region have used almost the same tactics which were used by the interest groups particularly NGOs in the developed and developing countries.

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REFERENCES

- Anzia, S.F., 2017. When does a group of citizens influence policy? Evidence from senior citizen participation in city. Thesis Submitted to Politics. Goldman School of Public Policy Department of Political Science University of California, Berkeley.
- Arons, D.F. and J.M. Berry, 2003. A voice for nonprofits. Washington, DC: The Brookings Institution Press.
- Baumgartner, F.R., J.M. Berry, M. Hojnacki, D.C. Kimball and B.L. Leech, 2009. Lobbying and policy change. Chicago: University of Chicago.
- Baumgartner, F.R. and B.L. Leech, 1998. Basic interests: The importance of groups in politics and in political science. Princeton, New Jersey: Princeton University Press.
- Berry, J.M., 1977a. Lobbying for the people. Princeton: Princeton University Press.
- Booth, D., 1994. Rethinking social development: An overview. London: Longman.
- Clarke, G., 1998. Non-governmental organizations (NGOs) and politics in the developing world. XLVI. Political Studies: 36–52.
- Elliott-Teague, G.L., 2007. NGOs in policymaking in Tanzania: The relationship between group characteristic, Political Participation and Policy outcomes . Indiana University.
- Fisher, J., 1998. Nongovernments: NGOs and the political development of the third world. Kumarian: Hartford.
- Gais, T.L. and J.L. Walker, 1991. Pathways to influence in American politics. In mobilizing interest groups in America: Patrons, Professions, and social movements . Ann Arbor: University of Michigan Press.
- Grant, W., 2005. Pressure politics: A politics of collective consumption? University of Warwick Institutional Repository, 58(2): 366-379.
- Haynes, J., 2007. Democracy and civil society in the third world: Politics and new political movements. Cambridge: Cambridge Policy Press.
- Kaufmann, D., E.F. McGuirk and P.C. Vicente, 2015. Foreign aid preferences and perceptions in donor countries. 1-46. Available from <http://www.pedrocente.org/aid.pdf> [Accessed October 9, 2017].
- Kurdistan Commission of Integrity (KCI), 2016. Available from www.despaky.krd. Retrieved from <http://despaky.krd/Default.aspx>.
- Kurdistan Parliament, 2018. Commission of integrity law No 3, 2011. Available from <http://www.kurdistan-parliament.org/files/articles/090811105755.pdf>.
- Kurdistan Parliament Commission of Integrity Law No 3, 2011. Available from <http://www.kurdistan-parliament.org/files/articles/090811105755.pdf>.
- Lewis, D.L., 2001. The management of non-governmental development organisations. London: Routledge.
- Maloney, W.A., G. Jordan and A.M. McLaughlin, 2017. Interest groups and public policy: The insider/outsider model revisited. Journal of Public Policy, 14(1): 17-38. DOI <https://doi.org/10.1017/s0143814x00001239>.
- Martini, M., 2012. Influence of interest groups on policy-making. Available from https://www.transparency.org/whatwedo/answer/influence_of_interest_groups_on_policy_making.
- Mccormick, H., 2014. Participation of NGOs in land degradation policy-making in Uganda: Is opportunity to participate enough? Master Thesis submitted to United Nations University Institute for Water, Environment and Health (UNU-INWEH).
- Miroff, B., R. Seidelman, T. Swanstrom and T. Luca, 2014. The democratic debate: American politics in an age of change. Boston, Massachusetts, United States: Cengage Learning
- Mohd, R. and K.C.S. Lee, 1999. Tactics of environmental NGOs in influencing public policy in Malaysia. Pertanika Journal of Social Sciences and Humanities, 7(2): 71-77.
- Nelson, P., 1995. The world bank and non-governmental organizations: The limits of apolitical development. London: Macmillan.
- Page, E.C., 1999. The insider/outsider distinction: An empirical investigation. British Journal of Politics and International Relations, 1(2): 205-214.

- Riddell, P., 1998. Parliament under pressure. London: Victor Gollancz.
- Rush, M., 1990. Parliament and pressure politics. Oxford: Oxford University Press.
- Silva-Leander, A., 2015. The role and influence of non-governmental organization on anti-corruption policy reform in Indonesia. Published PhD thesis, London School of Economics and Political Science.
- Smith, M.C., 1993. Pressure, power & policy: State autonomy and policy networks in Britain and the United States. Pittsburgh: University of Pittsburgh Press.
- Smith, P., 1999. Political communication in the UK: A study of pressure group behaviour. *Politics*, 19(1): 21-27.
- Thomas, D.C., 2001. International NGO's, state sovereignty, and democratic values. *Chi. J. Int'l L.*, 2(2): 11.
- Wlaker, J.L., 1991. Mobilizing interest groups in America, partens, professions and social momements. Ann Arber. University of Michigan Press.
- Wolton, S., 2016. Lobbying, inside and out: How special interest groups influence policy choices. London School of Economics.

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