

A Visual Framework for Identifying Sources of Unnecessary Regulatory Burdens on Business

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Abstract: *This paper studies the development of a visual framework for identifying unnecessary regulatory burdens on business. The objectives of regulations are to protect people, environment and economic activities. Poor designed regulations and poor enforcement and administration of regulations resulting in unnecessary regulatory burdens on business. The burdens are cost to business, which could otherwise be put to a more productive usage. From literature review conducted, we noticed there is a lack of information on identification of sources of unnecessary regulatory burdens. To date, no single study has been conducted on developing a visual framework to facilitate regulators in identifying sources of unnecessary regulatory burdens. We have utilized action research model in carrying out the study. A visual framework for identifying unnecessary regulatory burdens on business has been successfully developed and tested as the output of the study.*

Keywords: Unnecessary Regulatory Burdens, Visual Framework, Action Research

1. Introduction

Regulation is a key mechanism for attaining the social, economic and environmental policy objectives of a government (ANAO, 2014). Regulators administer regulations. They are government ministries, agencies, or organisations that are empowered by legislation to administer and enforce the regulation. Regulators ensure that regulated businesses comply with the regulations. A regulated business complies with regulations through regulatory instruments such as licence, permit, registration and notification.

The definition of regulation used in this thesis (ANAO, 2014, p. iv):

“The administration of any rule put in place with government authority where there is a reasonable expectation of compliance. Regulation is intended to influence or compel a particular behaviour by business and the community and includes legislation, regulations, quasi-regulations, such as industry standards and codes of practice, industry/government agreements, accreditation schemes and international treaties to which the government is a signatory.”

Occasionally, businesses experience regulatory burdens or red tapes when dealing with regulators (HLGAB, 2014; Swedish, 2010). Examples of regulatory burdens include multiple interactions with regulators, delay in obtaining permits, high amount of fees, prescriptive regulatory requirements and overlapping requirements with other regulations. Some of the regulatory burdens are necessary, and business has to comply with them. However, some are unnecessary. Governments all over the world initiate programmes to reduce regulatory burdens or red tapes (Hilmer, 2013). The primary objective of the programmes is to improve public service delivery and the environment to do business (GTZ & Mesopartner, 2010).

Bozeman (2000) defined compliance burden as total resources actually utilised in complying with the rule. Bozeman regarded compliance burden as the direct cost of

regulation, which is a part of the total regulation cost. The total regulation cost constitutes the cost of compliance burden, implementation burden, regulation formulation and opportunity cost imposed by the regulation. Regulators undertake the implementation burden, and regulated businesses bear the compliance burden.

Djankov, McLiesh and Ramalho (2006) conducted a research on regulations governing business activities, which is a major determinant of growth. Data was collected from 135 countries in seven regulatory areas. The areas are starting a business, registering property, hiring and firing workers, getting bank credit, enforcing contracts in court, protecting equity investors and closing a business. The research concluded that there is a consistent relationship between more friendly business regulations and higher growth rates. Djankov et al. (2006) suggested that countries should improve their business regulations when creating growth policy.

Bozeman's (1993) definition of red tapes, which is widely used by academicians, is rules, regulations and procedures that require compliance but do not meet the organisation's functional objective for the rule.

Regulatory burdens can also result from inefficiencies in communication and information exchanges among stakeholders (GTZ & Mesopartner, 2010). Many literatures describe regulatory burdens as creating adverse effects. However, Kaufman (2015) also introduced the notion of “beneficial red tapes” together with “negative red tape”. According to Bozeman and Feeney (2011) the number of regulations does not cause red tapes, instead regulations that consume resources and do not meet the intended objectives were the contributors. The good regulatory design minimises unnecessary regulatory burdens on business (AGPC, 2009). Best practice regulation applies the lowest necessary regulatory burdens to business to achieve the policy goals. Hence, it maximises the net benefits to the business.

2. Sources of Unnecessary Regulatory Burdens

A small number of literatures discussed the sources of unnecessary regulatory burdens or red tape. Bozeman and Feeney (2011) has developed a model of red tape and its determinants. The model was derived from Bozeman's theory of red tape (Bozeman, 1993; Bozeman, 2000).

Bozeman and Feeney (2011) described that red tape can occur at the same time rules are created. In addition, rules can also become red tape over a period. The former is referred to as "rule-inception red tape" and the latter as "rule-evolved" red tape. In this thesis, rules are assumed to include acts, regulations, procedures and other regulators' regulatory instruments. The term rules will be used interchangeably with the term regulation in this thesis. The theory assumes rules to have a behaviour requirement of rules formation, implementation plan, and enforcement mechanisms.

A good description of sources of unnecessary regulatory burdens is given in the Australia's Government Productivity Commission report (AGPC, 2009). We utilised the

definition in his research. Unnecessary regulatory burdens are derived from a number of sources. The three broad categories are (AGPC, 2009):

- 1) Problem with regulations themselves;
- 2) Poor enforcement and administration; and
- 3) Unnecessary duplication and inconsistency.

The first category is the problem with regulations themselves. It comprises of unclear or questionable objectives, conflicting objectives, overly complex regulation, excessively prescriptive regulation, redundant regulation, and regulatory creep. The second category, poor enforcement and administration; is made of excessive reporting and recording requirement, inadequate resourcing of regulators, overzealous regulation and regulatory bias.

The third category is the unnecessary duplication and inconsistency. Duplication of regulation, inconsistency in regulation, and variation in definition and reporting requirement are sources of regulatory burdens in this category. A summary of the sources of regulatory burdens or red tape as described by Bozeman and Feeney (2011) and AGPC (2009) is illustrated in Table 1.

Table 1: A summary of sources of unnecessary regulatory burdens (Bozeman & Feeney, 2011; AGPC, 2009)

<i>Bozeman (1993)</i>	<i>AGPC (2009)</i>
• Incorrect rule forecasts	• Unclear and questionable objectives
• Illegitimate functions	• Conflicting objectives
• Negative-sum compromise	• Overly complex regulation
• Over control	• Excessively prescriptive regulation
• "Organisational phantom" and rule drift	• Redundant regulation
• Implementation change	• Regulatory creep
• Change in the functional object	• Excessive reporting and recording requirement
• Change in the rule's ecology	
• Rule strain	• Inadequate resourcing of regulators
• Rule incompatibility	• Overzealous regulation
	• Regulatory bias or capture
	• Duplication of regulation
	• Inconsistency regulation
	• Variation in definitions and reporting requirements

3. Identification of Sources Unnecessary Regulatory Burdens on Business

In Australia, extensive consultation activities with the regulated business including chambers of commerce and business associations from various industries were performed in identifying unnecessary regulatory burdens (COAG, 2012). Interviews, focus group discussion and survey were among the activities. They were time-consuming and costly.

Small businesses were concerned about regulations that are overbearing and lacking in understanding of the industry. The businesses were also concerned about the variations the same regulation being implemented across the country. Duplication of regulatory requirements irritated them. The use of information technology such as web-based solutions that could reduce reporting and compliance burdens was limited. Small businesses experienced an increase in paperwork and information compliance obligations.

A number of studies have been carried out to access regulatory burdens or benefits on business. Kitching and Smallbone (2010) have categorised the studies into four types. They are perception surveys, compliance cost studies, qualitative studies and cross-national surveys. In opinion surveys, business owners were asked about their knowledge whether regulations burden them (Carter, Mason, & Tagg, 2009; Mason, Carter, & Tagg, 2006). Many of business owners agreed that regulations burden them. Some studies have suggested that the stated effects are overstated (Allinson, Braidford, Houston et al., 2005). Respondents provided data for an explanation of regulatory effects, but do not themselves constitute a reason (Silverman, 2011).

There are a number of studies that focus on compliance cost. The primary focus of the studies is on quantifying the costs of compliance (Chittenden, Kauser, & Poutziouris, 2002; Crain and Crain, 2010; Lancaster, Ward, Talbot et al., 2003). Compliance costs constitute the labour time costs associated with the regulatory compliance activities. Examples of the activities include discovering, interpreting and complying

with regulations, recording information and reporting to the regulator.

Regulation has been argued to raise the substantive, administrative and psychological costs to businesses, deterring start-up, investment and innovation, and ultimately impeding growth (Chittenden, Kauser, & Poutziouris, 2005). Studies on compliance costs have highlighted the importance of the financial, time and psychological costs related to compliance.

Cross-national surveys were conducted to explore whether regulations could be associated with macro-level economic indicators such as business entry rates, productivity and growth (Caballero, Cowan, Engel et al., 2013; Capelleras, Mole, Greene & Storey, 2008; Djankov et al., 2002; Djankov, 2009; Klapper, Laeven & Rajan, 2006). The regulation was proxied using indicators constructed from the World Bank's database or other similar databases. The surveys found that regulations correlated with adverse macro-level outcomes.

Qualitative studies have examined the dynamic influence of regulation on business decision-making and competitiveness (Arrowsmith, Gilman, Edwards et al., 2003; Ram, Edwards, & Jones, 2007). These studies provide deeper micro-level insights compared to other types of study by showing how small business agents (i.e. owners, managers and employees) possess varying level of awareness about regulation, interpret and adapt to regulation in varying degrees. Qualitative studies are useful for the heterogeneity of the agents' responses to regulation and the influence of stakeholders on the small firm's performance. Edwards, Ram and Black (2003) concluded that regulations often exert only a limited impact on small businesses. Most firms can adapt to regulation by absorbing any additional costs or passing them on to customers.

The indirect impacts of unnecessary regulations due to inefficient regulations affect business productivity. It distorts the allocation of resources. Inefficient regulations could also increase prices, impede employment growth and reduce the flexibility of small businesses to respond to change. Reducing regulatory burdens foster entrepreneurship. An empirical research finding has confirmed that countries, where entrepreneurs can register their business quickly, have seen more entries in industries that experienced an increase in global demand and technology shifts (Ciccone, 2007).

4. Visual Framework

Visual helps to facilitate practices in situations such as learning, meeting, analysis, design, operation, innovation, decision-making and strategic planning (Sibbert 2010, 2013; Rohde 2013, 2015; Paddrik, Haynes, Todd, Beling & Scherer, 2014; Kaplan & Norton, 2004; Pichlis, 2014; Kumar, 2013). Kaplan and Norton (2004) have developed a Strategy Map, which provides a visual framework for an organisation's strategy. The strategy map links the desired productivity with growth outcomes, customer value proposition, outstanding performance in internal processes and capabilities required from intangible assets. The

strategy map captures the organisation strategy in visual form. It facilitates managers in executing the desired strategy.

Pichlis (2014) demonstrated the visualising and prototyping in his works on the utilisation of service design tools to support the evolution of a service concept. The study examined a multidisciplinary service design project that developed a solution for communicating the sustainability of meals. Passera, Karkkainen and Maila (2012) have developed a visual of the service prototyping practical framework.

5. The Research

Problem Statement

A problem statement is a statement of issues that are under further investigation (Sekaran, 2003). This research aims at addressing the problem of identifying the sources of unnecessary regulatory burdens on business by regulators. For example, based on current regulations that regulate a petrol station business, what would be the possible unnecessary regulatory burdens on the petrol station? Can a regulator's staff indicate sources of unnecessary regulatory burdens?

The lack of literatures on this thematic topic restricts we from providing the evidence to validate the problem statement. Our experience in the field indicates that there is a real need for the problem to be researched in greater details. In conducting the research, we have to understand the current practices in the identification process carried out by a regulator's staff. We plan to perform a series of iterations together with the staff that will lead to the development of a visual framework that is useful to them. The solution to the problems should make it easier for a regulator's staff to identify the sources of unnecessary regulatory burdens on business using the recommended visual framework. We plan to explore the possibility that the sources of unnecessary regulatory burdens could be detected by using the proposed visual framework.

Research Questions

The primary functions of research questions are to explain what the study intends to learn or understand (Maxwell, 2003). The research problem leads us to the following research questions:

- 1) How do a regulator staff currently identify the sources of unnecessary regulatory burdens on business for a given business entity?
- 2) How to develop a framework for identifying the sources of unnecessary regulatory burdens on business?
- 3) How to design a visual identification framework?
- 4) How useful is the visual framework for identifying the sources of unnecessary regulatory burdens on business by a regulator's staff? In other words, how would the visual framework improve work practices of a regulator's staff?

Research Objectives

The overall objectives of the research are:

- 1) To understand how a regulator staffs identify the sources of unnecessary regulatory burdens.
- 2) To propose a framework for identifying the unnecessary regulatory burdens on business. The framework aims at improving the regulators' work.
- 3) To design the visual identification framework.
- 4) To document and analyse the results of an intervention program in order to increase the usefulness of the visual framework in identifying the sources of unnecessary regulatory burdens.
- 5) To contribute lessons learned and observations made in developing a visual framework for identification of sources of unnecessary regulatory burdens.

Significance of the study

The success in identifying and reducing the unnecessary regulatory burdens on business reduces compliance cost. It helps improve ease of doing business. It also enhances the efficiency of the regulators' service delivery.

Hilmer (2013) reported that the red tape cost is substantial. For example, the United Kingdom's Gross Domestic Product is about 3 trillion British Pound. Assuming that the percentage of the estimated government red tape is maintained at 0.29% (Table 2), the value of the red tape is about 8.7 billion British Pound.

Table 2: The Estimated Cost of Regulations of GDP (Hilmer, 2013)

Country	Total Administrative Cost	Administrative Cost Attributable to Government Regulation	Estimated Government Red Tape
United Kingdom	2.5%	1.0%	0.29%
Netherlands	3.6%	1.4%	0.41%
Denmark	2.2%	0.9%	0.26%
Czech Republic	3.0%	1.1%	0.32%

Businesses could use the cost saving towards further enhancing their business. For example, they could invest in value-adding activities such as new product development and marketing (Chittenden, Kauser, & Poutziouris, 2002; Crain & Crain, 2010). Similarly, regulators could also save on their operating cost as a result of the efficiency of their service.

Research Methodology: Action Research Model

Many literatures suggest Kurt Lewin as the pioneer in Action Research (AR) works (Kemmis & McTaggart, 1990; Zuber-Skerrit, 1992; Holter & Schwartz-Barcott, 1993; Reason, 2001). Lewin's central AR idea is "studying things through changing them and seeing the effect" (Sandford, 1970).

AR uses several cycles of investigation to reveal the solutions to problems in a particular situation and localised settings (Stringer, 2014). An AR sequence constitutes diagnosing, action planning, action taking, evaluating and specifying learning (Figure 3.2). AR is a collaborative

approach to an inquiry. It enables people to perform a systematic action to resolve specific problems. In short, AR is "learning by doing". Dick (1999, 2000) is an excellent on-line reference for AR. AR is suitable for postgraduate research work (Phillips, 2014). Perry and Zuber-Skerrit (1991, 1992) have produced the guidelines for AR for postgraduate research. They also included a discussion on the thesis writing for AR based research.

Dick (1999) has described how AR could be used and reported for a dissertation. The candidate's independent thesis research and writing comprise of four main phases, which are planning the thesis, acting in the fieldwork, observing and evaluating the fieldwork and reflecting on the results of the fieldwork in the light of the literatures and the researcher's theoretical framework. This reflection should lead to the argument and contribution of the thesis to the knowledge in the field. Professionals who want to use research to improve their practices tend to choose AR (Denscombe, 1998). Krathwohl (1998) reiterated that the objective of AR is to find improvements to practical problems, making AR a suitable approach to solving practical everyday problems.

The summary of the studies of research on the factors that attract practicing managers to use AR in their works is described in Sankaran and Tay (2003). The factors include:

- 1) It uses action as an integral part of the research and integrates with thought.
- 2) It is focused on the researcher's professional values instead of methodological considerations.
- 3) It allows practitioners to research their activities.
- 4) It helps improve practices at the workplace of an organisation.
- 5) It helps managers in their professional development. It examines their beliefs and practices.
- 6) It helps managers to be multidisciplinary. They work across technical, cultural and functional boundaries.
- 7) It helps managers in implementing change effectively. Managers involved are participants in the change process. It pursues changes in action and understanding through research.
- 8) It is problem-focused, context-specific and future-oriented.
- 9) It helps in developing a holistic understanding.
- 10) It can use a variety of data collection methods.

Our proposed AR model is as shown in figure 1. We started with AR cycle one on the literature review based on the formulated problem statement and research questions. Subsequently, we carried out few AR cycles in the core AR project. The second AR cycle was developing the baseline or understanding on how the regulator's staffs identify the sources of unnecessary regulatory burdens. Based on the evaluation of the AR cycle two and other sources of information, we developed the initial visual framework.

We carried out the subsequent series of the AR cycles. They are focus group discussion with senior staffs, two interviews with regulatory experts to gather their feedbacks on the developed visual framework. These were followed by a focus group with the same sample of junior staff to use the

developed visual framework. The final AR cycle will be the thesis writing, which documents the entire research work.

THE ACTION RESEARCH MODEL

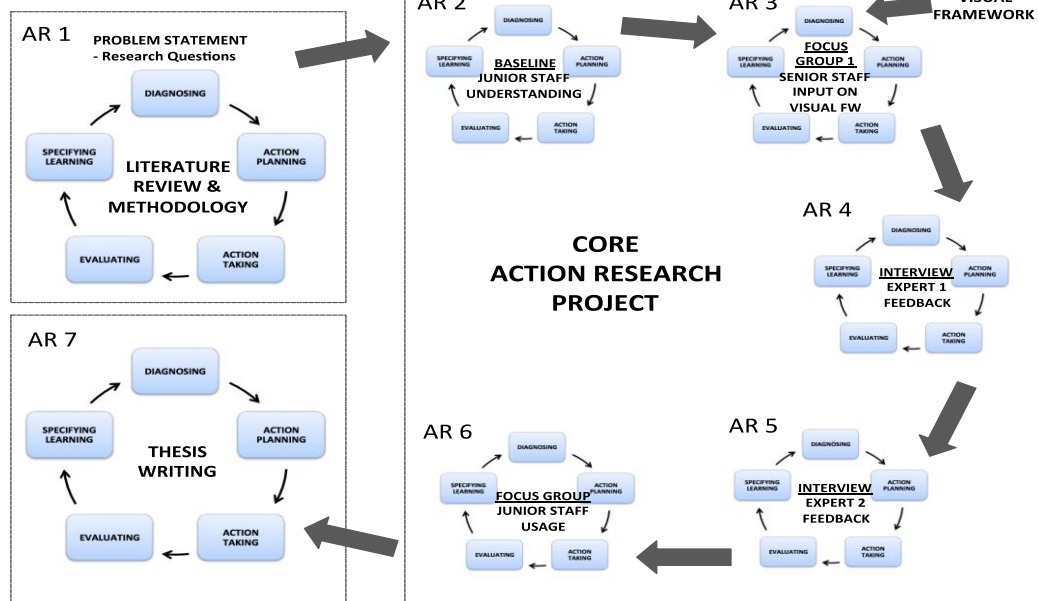


Figure 1: Action Research Model used in this study

The Research's Output: The KICM Visual Framework

The output of the study was a visual framework for identifying sources unnecessary regulatory burdens on business. The overall framework, is known as KICM Visual Framework, provides the guidance or method for a regulator staff to identify sources of unnecessary regulatory burdens. Figure 2 shows the KICM Visual Framework.

The design philosophy behind the framework is to look at regulatory compliance from business perspectives. Information on business activities is gathered and correlated with regulatory instruments that the business encountered. For each regulatory instrument, unnecessary regulatory burdens are identified. Finally, the unnecessary regulatory burdens are mapped with 12 sources of unnecessary regulatory burdens.

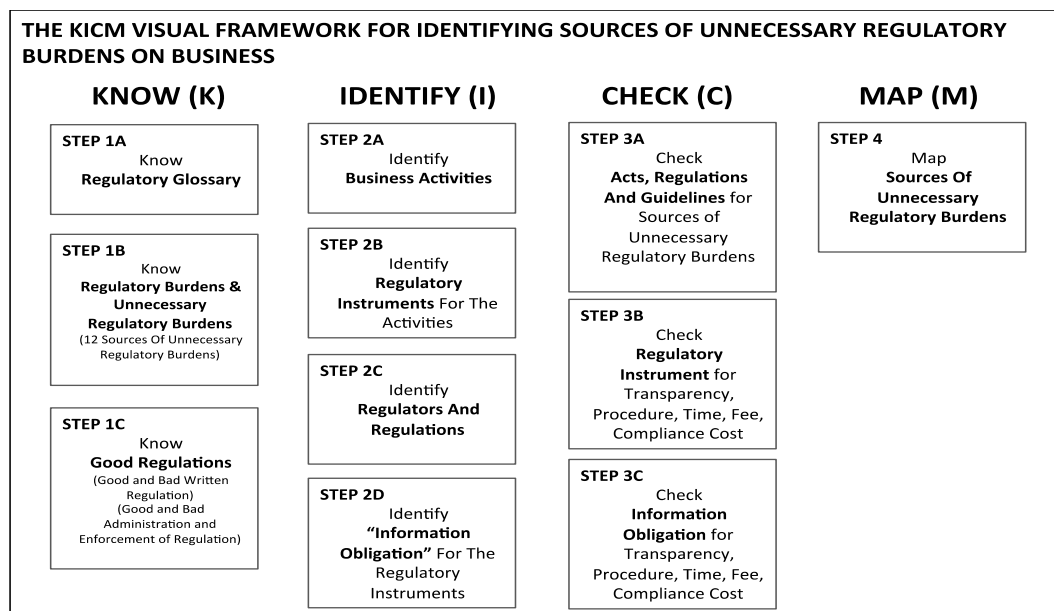


Figure 2: The overall KICM Framework in identifying sources of unnecessary regulatory burdens on business.

The Step 1: **KNOW (K)** prepares regulators' staff on the knowledge of regulatory glossary, regulatory burdens, unnecessary regulatory burdens, and what are good regulations. Good regulations encompass information about good and bad regulations, and good and bad administration and enforcement of regulation. The information is provided in the form of visual templates.

The Step 2: **IDENTIFY (I)** provides visual templates to identify business activities, regulatory instruments, regulators and regulations, and information obligation. It is important to understand about business activities. Some of these activities require complying with regulations. For example, a business has to apply a permit to import a

particular product or apply for advertisement license for before the business can put up a billboard.

The Step 3: CHECK (C) provides visual templates for the staff to check whether acts, regulations and guidelines are transparent. What is meant is easily available for access from a website or publish documents. A visual template, step 3b, requires staffs to check whether regulatory instruments are transparent. Also, the staffs are required to check on a number of procedure or interaction between business and a regulator in using the regulatory instrument, processing time, the amount of fee imposed and compliance cost to the business. Finally, a visual template provided to check about information obligation with regards to transparency, some procedures, processing time by regulators, fee and compliance cost.

The Step 4: Map (M) provides visual templates to allow staff to map unnecessary regulatory burdens according to its

sources. Currently, 12 sources unnecessary regulatory burdens have been identified and divided into two categories namely 'Problem with Regulation Themselves' and 'Poor Enforcement and Administration' as shown in figures below.

Sources of unnecessary regulatory burdens on business due to problems with regulations themselves are unclear or questionable objectives, conflicting objectives, overly complex regulation, excessively prescribed regulation, redundant regulation, regulatory creep and inconsistency of regulation (Figure 3). Meanwhile, sources of unnecessary regulatory burdens resulting from poor enforcement and administration of the regulations are excessive reporting and recording requirement, inadequate resourcing of regulators, overzealous regulation, regulatory bias or capture, and variations in definitions and reporting requirements (Figure 4).

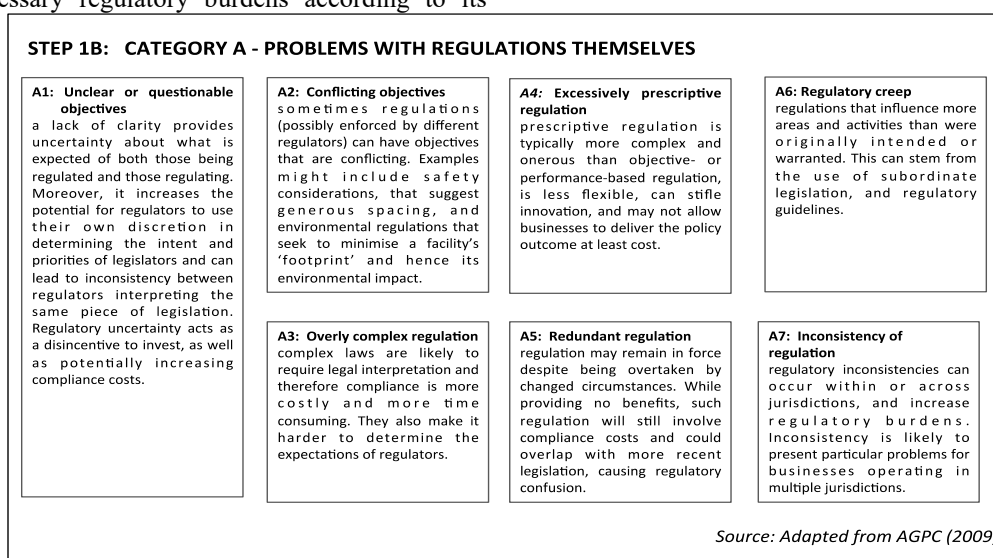


Figure 3: Shows sources of unnecessary regulatory burdens derived from problem with regulations themselves AGPC (2009).

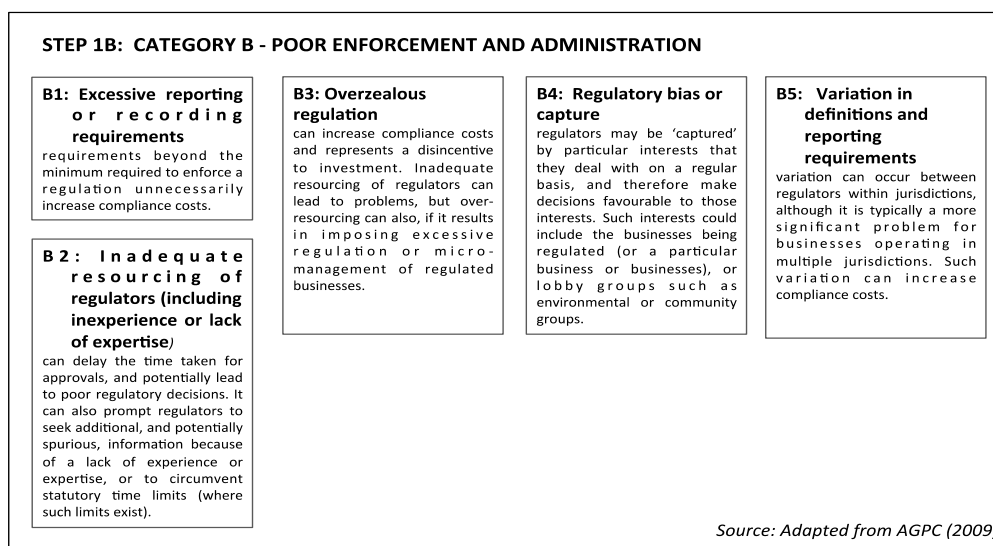


Figure 4: Shows sources of unnecessary regulatory burdens derived from poor enforcement and administration AGPC (2009)

In Step 2A, a regulator staff use the visual template to list out business activities for a given business. For example, an architect firm's business activities include company registration; obtain development order and getting building

plan approval from local councils (Figure 4). The source of business activities can be gathered by interviewing architects, architects and regulators websites. It is important that the business activities are comprehensively gathered

because most of these activities required the business to comply with regulations through regulatory instruments. Examples of regulatory instruments include license, permit, registration, notification and inspection, which need to be obtained from various regulators.

Step 2B and 2C use a single visual template to facilitate the identification of a regulatory instrument, regulation and

regulator, for each business activity (Figure 6). For example, an architect requires building plan approval from local council. The corresponding regulatory instrument is building plan approval, which is a permit. The permit is issued by a local council where the building is going to be constructed.

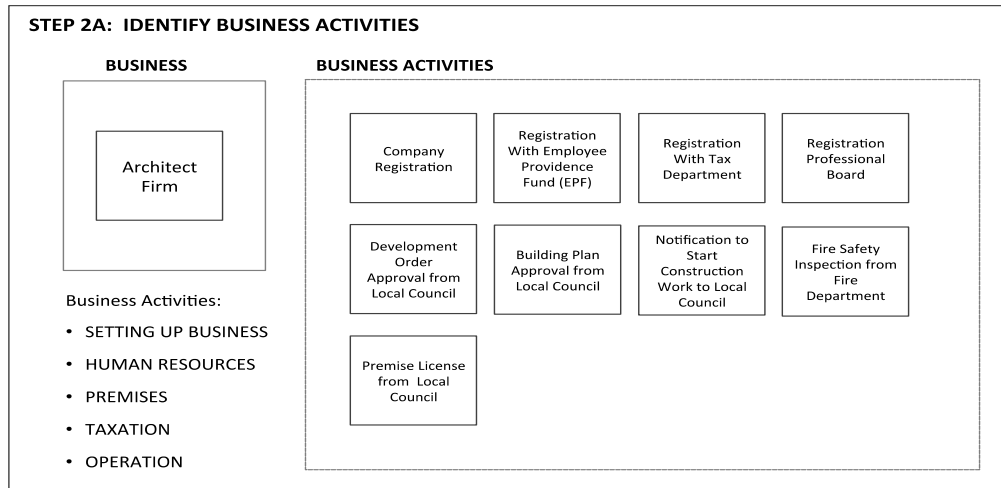


Figure 5: Shows the visual template in identifying business activities for a business.

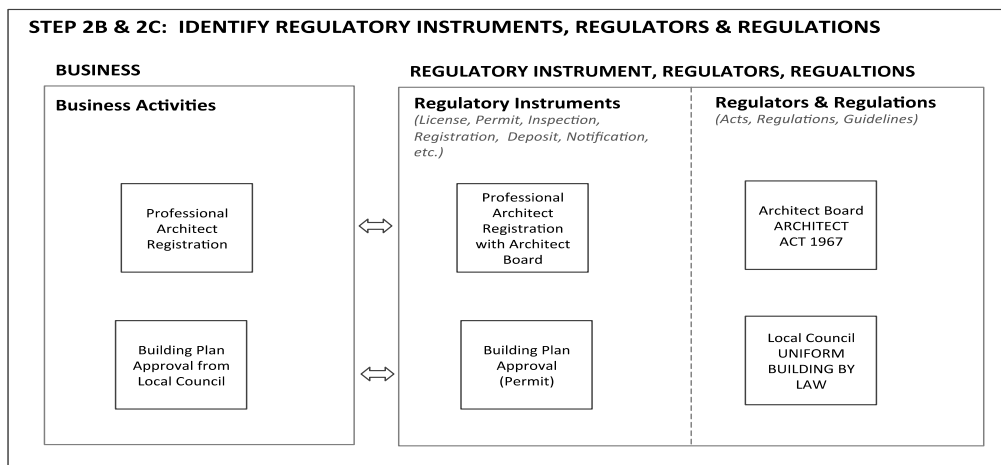


Figure 6: Shows a visual template for mapping business activities with regulatory instrument, regulations and regulators.

The final step in Step 2, Step2D, is the identification of information obligation for each regulatory instrument. Typically, every regulatory instrument has a checklist of information that needs to be submitted by a business. This checklists or requirements are call information obligations. For example, for a building plan submission, an architect firm needs to submit the building layout plan, land title and other information. The architect firm needs to get a certified copy of the land title from a land office. This process incurs

the cost to business such as cost to travel to the land office and purchases the certified copy of the land title.

Step 3A is a mapping process between regulations and sources of unnecessary regulatory burdens on business. Each regulation is tested with the sources. At the end of the mapping process, we should be able to compile regulations with unnecessary regulatory burdens.

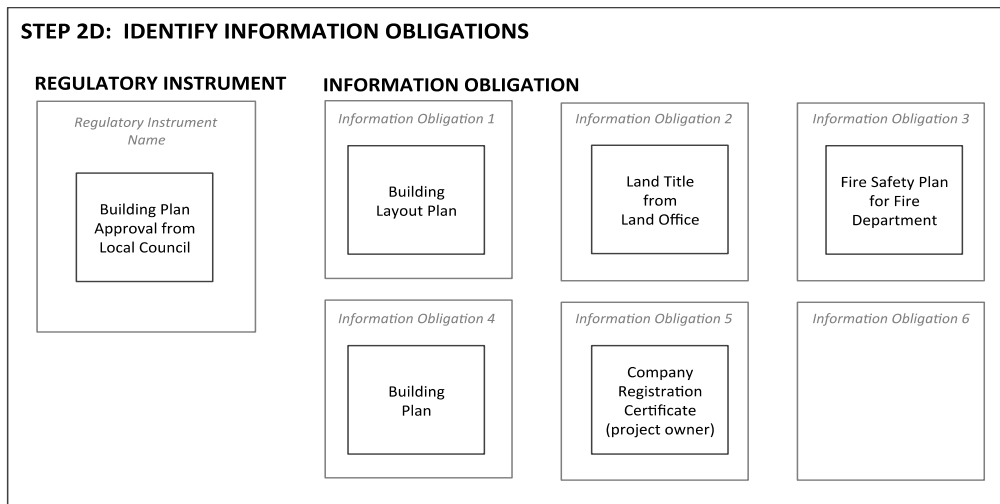


Figure 7: Shows a visual template for mapping a regulatory instrument with its information obligations

The step 3B and 3C's main objective is to measure the burdens in various parameters (Figure 9). They are transparency, the number of procedures, regulator's processing time, the fee charged by regulators and compliance cost to the business. This process enables us to quantify the regulatory burdens to business. The total regulatory burdens on a specific business could be

determined with the identified cost multiply with the volume of transactions for each regulatory instrument. In many studies, the regulatory burdens are calculated at the first level or immediate level of regulatory instrument. However, the information obligations demand and cause additional regulatory burdens to business.

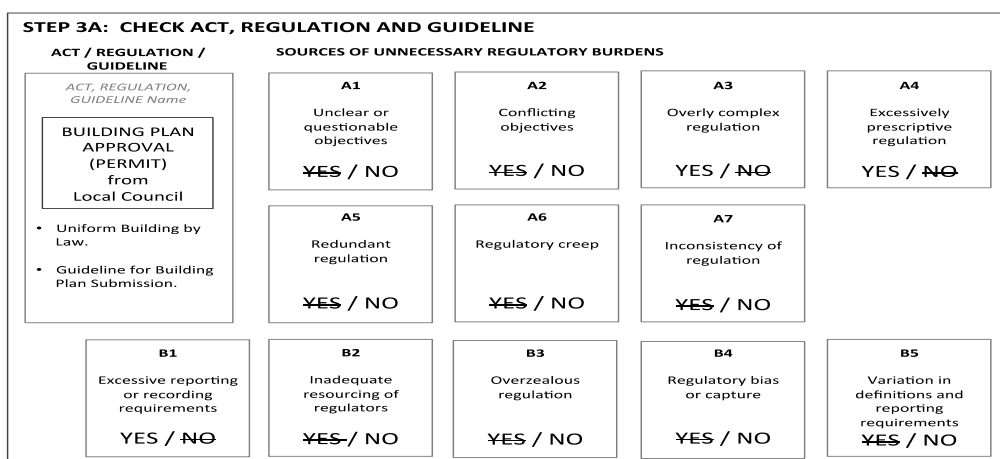


Figure 8: Illustrates the visual template of regulations and sources of unnecessary regulatory burdens on business

The step 4A (Figure 10 and 11) summarises some sources of unnecessary regulatory burdens by categorising them into two category namely problems with regulations themselves, and poor enforcement and administration of regulations. Once summarized, we could know which sources of

unnecessary regulatory burdens faced by a business. With the information, the regulator should be able to analyse further the sources and come out with solution objectives and options to solve or minimise the regulatory burdens.

STEP 3B & 3C: CHECK REGULATORY INSTRUMENTS AND INFORMATION OBLIGATIONS

REGULATORY INSTRUMENT & INFORMATION OBLIGATIONS ASSESSMENT	Transparency (easy access)	Procedure (number of interaction with regulator)	Time (processing time by regulator)	Fee (fee charged to business by regulator)	Compliance Cost (cost incurred by business to comply with reg.)
Regulatory Instrument Name					
Information Obligation 1 Land Title from Land Office	YES	2	3 days	RM 100	RM 350
Information Obligation 2 Company Registration Certificate	YES	1	1 day	RM 50	RM 100
Information Obligation 3 Fire Safety Plan	NO	2	7 days	RM 200	RM 700
Information Obligation 4 Building Layout Plan	YES	1	1 day	No Fee	RM 1000

Figure 9: Shows the visual template of regulatory instruments and regulatory burdens

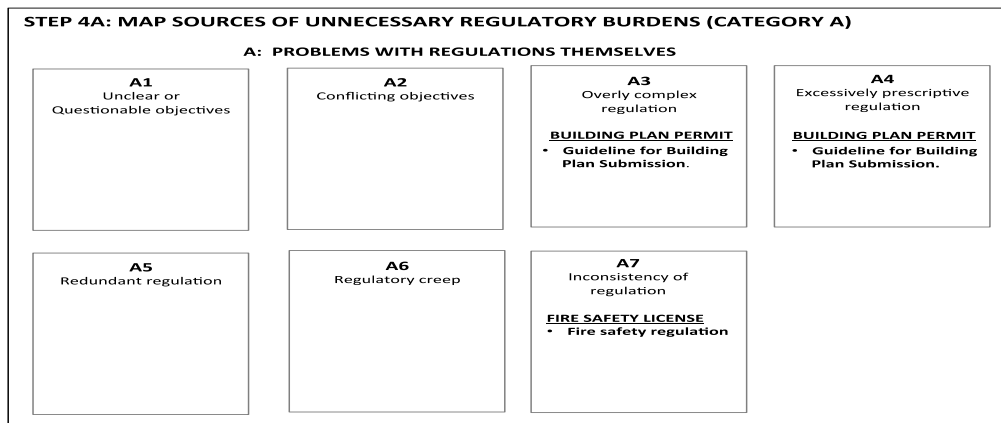


Figure 10: Shows the visual template for mapping regulation, which comprise of the main act, regulation and guideline to potential sources of unnecessary regulatory burdens on business due to problem with regulation themselves.

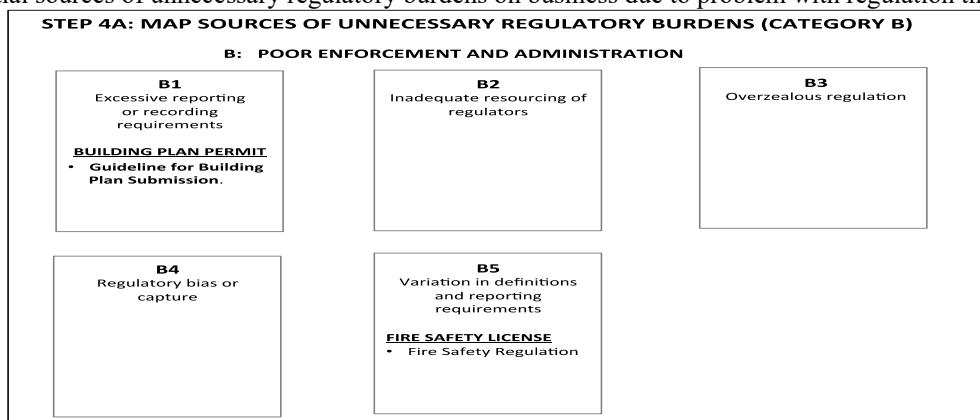


Figure 11: Shows the visual template for mapping regulation, which comprise of the main act, regulation and guideline to potential sources of unnecessary regulatory burdens on business due to poor enforcement and administration.

6. The Result of Using KICM Visual Framework

The research conducted by us involved a small number of samples (AR cycle 2). Four junior staffs of a regulator were interviewed, one person at a time, at the beginning of the research to find out their understanding of unnecessary regulatory burdens. The staffs have been involved on some regulatory burdens project at the organization for the last 18 months. We noticed all four junior staffs could only manage to identify between four to five sources of unnecessary regulatory burdens. In most of 'projects they participated, make use of engagement with business to find out regulatory issues or burdens encountered by business.

At the end of the AR cycle, the four junior staffs were called to participate in a workshop to use the visual framework for the first time. Prior to the workshop, the staffs have no knowledge about the visual framework. The workshop ran for three hours. At the end of the workshop, we have a discussion session with them. They can know and identify more sources of regulatory burdens by using the KICM Visual Framework.

The most significant feedback from the staffs was they understood the relationship between business activities and regulatory instruments. The also pointed the visual framework enhances their understanding of sources of unnecessary regulatory burdens. Most of them recommend the visual framework should be used to understand a

business and its related regulations and regulatory burdens prior to their engagement with business. The understanding will help them prepare themselves and ensure all aspects of regulations that regulate business activities are covered in the engagement session.

7. Conclusions

The research has produced the KICM Visual Framework for identifying unnecessary regulatory burdens on business by going through some action research cycles. The visual framework was further refined with the inputs from the regulatory experts interviewed. Finally, the KICM visual framework was tested with the same samples and proven to facilitate the samples in identifying sources of unnecessary regulatory burdens on business. Although the number of samples is small, the research can be further investigated to

The KICM Visual Framework is also noted could be a potential learning tool for regulators' staffs to study about regulatory burdens and, in particular, unnecessary regulatory burdens. The visual framework could structure and accelerate the learning process of regulators' staffs. Eliminating or minimizing unnecessary regulatory burdens would enhance business productivity and a significant amount of saving from unnecessary compliance cost could be used by business to expand the business.

References

- [1] AGPC (2009). Review of Regulatory Burden on Upstream Petroleum (Oil and Gas) Sector. *Australia Government Productivity Commission Report*.
- [2] ANAO, (2014). *Better Practice Guide: Administering Regulation*. Australia National Audit Office.
- [3] Allinson, G., Braidford, P., Houston, M., et al. (2005). Myths Surrounding Starting and Running a Business. *Small Business Service*. Retrieved 15th March 2015, www.berr.gov.uk/files/file38340.pdf
- [4] Arrowsmith, J., Gilman, M., Edwards, P., et al. (2003). The Impact of The National Minimum Wage in Small Firms. *British Journal of Industrial Relations* 41(3): 435–456.
- [5] Bozeman, B. (1993). A Theory of Government “Red Tape”. *Journal of Public Administration and Research Theory*, 3(3), 273–303.
- [6] Bozeman, B. (2000). *Bureaucracy and Red Tape*. Upper Saddle River, NJ: Prentice-Hall.
- [7] Bozeman, B. & Feeney, M. K. (2011). *Rules and Red Tape: A Prism for Public Administration Theory and Research*. New York: M. E. Sharpe.
- [8] Caballero, R., Cowan, K., Engel, E., et al. (2013). Effective Labor Regulation and Microeconomic Flexibility. *Journal of Development Economics* 101(1): 92–104.
- [9] Capelleras, J-L., Mole, K., Greene, F. & Storey, D. J. (2008). Do More Heavily Regulated Economies have Poorer Performing New Ventures? Evidence From Britain and Spain. *Journal of International Business Studies* 39(4):688–704.
- [10] Carter, S., Mason, C. & Tagg, S. (2009). Perceptions And Experience Of Employment Regulation in UK Small Firms. *Environment and Planning C: Government and Policy* 27(2): 263–278.
- [11] Chittenden, F., Kauser, S. & Poutziouris, P. (2002). Regulatory burdens of small business: a literature review. *Small Business Service*. Retrieved 31 March 2015, from www.berr.gov.uk/files/file38324.pdf
- [12] Chittenden, F., Kauser, S. & Poutziouris, P. (2005). PAYE–NIC Compliance Costs: Empirical Evidence from the UK SME Economy. *International Small Business Journal* 23(6): 635–656.
- [13] Ciccone, A. & Papaioannu, E. (2007). Red Tape and Delayed Entry. *Journal of European Economic Association*, 2007, 5(2-3), 444–458.
- [14] Crain, N. V. and Crain, W. M. (2010). The Impact Of Regulatory Costs On Small Firms. *Small Business Administration Office of Advocacy*. Retrieved 21 March 2015, from http://static.mgnetwork.com/rtd/pdfs/20110325_SBaregulation.pdf
- [15] Denscombe, M. (1998), *The Good Research Guide for Small Scale Research Projects*. Buckingham: Open University Press.
- [16] Dick, B. (1999). *Action research and publication*. Retrieved 9 March 2015, from <http://www.aral.com.au/resources/research.html>
- [17] Dick, B. (2000a). *A beginner's guide to action research*. Retrieved 9 March 2015, from <http://www.aral.com.au/resources/guide.html>
- [18] Djankov, S., Porta, R. L., Lopes-de-Selanes, F. & Shleifer, A. (2002). The Regulation of Entry. A survey. *The Quarterly Journal of Economics*, CXVII(1): 183–203.
- [19] Djankov, S., McLiesh, C. & Ramalho, R. (2006). Regulation and Growth. *Economic Letters*, 92(3), 395–401.
- [20] Djankov S (2009) The Regulation of Entry: A Survey. *World Bank Research Observer* 24(2): 183–203.
- [21] Edwards, P., Ram, M. & Black, J. (2003). The Impact Of Employment Legislation On Small Firms: A Case Study Analysis. *DTI Employment Relations Research Series No. 20*. Retrieved 15 March 2015, from www.bis.gov.uk/files/file11518.pdf
- [22] GTZ & Mesopartner, (2010). *Reducing Red Tapes*. South Africa.
- [23] Hilmer, G. F. (2013). The Red Tape Challenge – from Meat Axe to Scalpels. *IARIW-UNSW Conference on Productivity: Measurement, Drivers and Trends, November 26-27, 2013*. Sydney, Australia.
- [24] HLGAB (2014). Cutting Red Tape in Europe: Legacy and Outlook. *High Level Group of Administrative Burdens Final Report 2014*. Brussels.
- [25] Holter, I.M. & Schwartz, B., D. (1993). Action Research: What is it? How it has been used and how can it be used in nursing? *Journal of Advance Nursing*, 128, 298–304.
- [26] Kaufman, H. (2015). *Red Tape: Its Origins, Uses and Abuses*. Washington D.C.: The Brookings Institution Press.
- [27] Kaplan, R. S. & Norton, D. P. (2004). Strategy Maps: Converting Intangible Assets into Tangible Outcomes. Retrieved from <http://www.slideshare.net/led4lgus/strategy-mapping> (2nd April 2015).
- [28] Kemmis S. & McTaggart, R. (1990). *The Action Research Reader*. Deakin University Press.
- [29] Kitching, J. & Smallbone, D. (2010). *Literature Review for the SME Capability to Manage Regulation Project*, A Research Report, New Zealand: Inland Revenue.
- [30] Kumar, V. (2013). *101 Design Methods: A Structured Approach for Driving Innovation in Your Organisation*. New Jersey: John Wiley & Sons.
- [31] Krathwohl, D.R. (1998), *Educational & Social Science Research: An Integrated Approach*. New York: Longman.
- [32] Lancaster, R., Ward, R., Talbot, P. et al. (2003). *Costs of Compliance with Health and Safety Regulations in SMEs*. Norwich: The Stationery Office.
- [33] Mason, C., Carter, S. & Tagg, S. (2006). The Effect Of The National Minimum Wage on The UK Small Business Sector: A Geographical Analysis. *Environment and Planning C: Government and Policy* 24(1): 99–116.
- [34] Maxwell, J. A. (2013). *Qualitative research Design: An Interactive Approach*. Thousand Oaks, CA: SAGE Publications.
- [35] Paddrik, M. E., Haynes, R., Todd, A. E., Beling, P. A. & Scherer, W. T. (2014). The Role of Visual Analysis in the Regulation of Electronic Order Book Market. *Office of Financial Research Staff Discussion Paper*. 2014.
- [36] Passera, S., Karkkainen, H. & Maila, R. (2012). When, How and Why Prototyping?: A Practical Framework for

- Service Development. *The Proceedings of The XXIII ISPIM Conference 2012*, Barcelona, Spain.
- [37] Perry, C. & Zuber-Skerritt, O. (1991). Action research in graduate management research programs, *The First World Congress on Action Research & Process Management*, 1(6), 67-79.
- [38] Perry, C. & Zuber-Skerritt, O. (1992). Action Research in Graduate Management Programs, *Higher Education*, 23(2), 195-208.
- [39] Phillips, G. (2014). The Production-based PhD: an Action Research Model for Supervisors. *Quality Assurance in Education*, 22(4), 370-383.
- [40] Pichlis, D. (2014). Service Design Tools for Visualising and Prototyping: A Sustainable Meal Case. Master Thesis. Aalto University.
- [41] Poschke, M. (2010). The Regulation of Entry and Aggregate Productivity. *Economic Journal*, 120, 1175-1200
- [42] Ram, M., Edwards, P. & Jones, T. (2007). Staying Underground: Informal Work, Small Firms and Employment Regulation in The United Kingdom. *Work and Occupations* 34(3): 318–344.
- [43] Reason, P. (2001). Learning and change through action research. In Henry, J. (Ed.), *Creative Management*. London: Sage Publications.
- [44] Rohde, M. (2015). *The Sketchnote Workbook: Advanced Techniques for Taking Visual Notes You can Use Anywhere*. Peachpit Press.
- [45] Rohde, M. (2013). *The Sketchnote Handbook: The Illustrated Guide to Visual Note Taking*. Peachpit Press.
- [46] Sankaran, S. & Tay, B.H. (2003). Action Research Models in Business Research, *9th Australian and New Zealand Systems Conference (ANZSYS)*, Melbourne.
- [47] Sanford, N. (1970). Whatever happened to action research? *Journal of Social Issues*, 26(4), 3-23.
- [48] Sekaran, U. (2003). *Research methods for business: A skill building approach (4th ed.)*. Singapore: John Wiley & Sons.
- [49] Sibbert, D. (2013). *Visual Leaders: New Tools for Visioning, Management & Organisation Change*. New Jersey: John Wiley & Sons.
- [50] Sibbert, D. (2010). *Visual Meetings: How Graphics, Sticky Notes & Idea Mapping Can Transform Group Productivity*. New Jersey: John Wiley & Sons.
- [51] Silverman, D. (2011). *Interpreting Qualitative Data (4th ed.)*, London: SAGE Publications.
- [52] Stringer, E. T. (2014). *Action Research (4th Ed.)*. Thousand Oaks, CA: Sage Publications.
- [53] Swedish (2010). *The Economic Effects of the Regulatory Burden*, Swedish Agency for Growth Policy Analysis.
- [54] Zuber-Skerritt, O. (2002). The Concept of Action Learning. *The Learning Organisation*, 9(3), 144-124.