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TRANSPARENCY
INTERNATIONAL
Cambodia



STRATEGIC PLAN 2016-2020 COLLECTIVE ACTION FOR TRANSPARENCY AND INTEGRITY

Transparency International Cambodia (TI Cambodia) is the national chapter of Transparency International, the global civil society organisation leading the fight against corruption. Founded in July 2010, we work together with individuals and institutions at all levels to promote integrity and reduce corruption in Cambodia.

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Every effort has been made to verify the accuracy of the information contained in this strategic plan. All information was believed to be correct as of February 2016. Nevertheless, Transparency International Cambodia treats this strategic plan as a living document and reserves the rights to amend any time it deems necessary.

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PREFACE

Transparency International Cambodia (TI Cambodia) Strategic Plan 2020, “Collective Action for Transparency and Integrity”, aims to inform both internal and external stakeholders—especially TI Cambodia’s management team, Board of Directors and donors—on the strategic direction the organisation aims to take in the next five years.

This Strategic Plan is built on the successes and impact created by TI Cambodia during the past three years. Since 2013, the Board of Directors and management team of TI Cambodia met on several occasions to discuss how best we could maximise the impact of the current strategy and what the strategic priorities for the next five years should be. In May 2015, the Board of Directors of TI Cambodia approved TI Cambodia’s next five-year strategy, results framework and financial plan.

This Strategic Plan is the result of the joint efforts of both the management team of TI Cambodia and the Board of Directors, who provided invaluable input and strategic direction. We would like to thank all members of the Board, the Executive Director, all heads of divisions and programme managers and officers for their significant contribution to this strategy. Special thanks to Pisey Pech, Director of Programs and Long Sun, Directors of Operations, who led the development of this strategy and provided the quality assurance throughout the process under guidance and leadership of the Executive Director; Vicheth Chunly Serey, Raksa Pen, Sovattha Neou, Virak Prum, Meng Aun Seang and Sokunthea Chea, the programme and operations unit managers, who provided valuable input on each programme component; Maud Salber, the former head of the communications unit for providing input and designing the layout of this document; and all of TI Cambodia’s staff, especially Visalh Top and Lim Sokly for their assistance throughout the process. Last but not least, we would like to give our special thanks to individuals and institutions who spent their precious time participating in TI Cambodia’s online survey on the strategic priorities TI Cambodia should take in the next five years.

Our strategic plan was developed based on inputs from relevant stakeholders and from the people through face-to-face meetings as well as through online surveys. When we execute this strategic plan, we seek and would appreciate good collaboration and cooperation from all key stakeholders, especially active participation from the Cambodian people who are key players in driving transformation and who will ultimately benefit from the results of which this strategy will produce.

Sopheak OK SEREI

Chairman of the Board of Directors

TI Cambodia

Kol PREAP

Executive Director

TI Cambodia

EXECUTIVE SUMMARY

Transparency International Cambodia (TI Cambodia) is the national chapter of Transparency International, the global civil society organisation leading the fight against corruption. TI Cambodia was officially founded in 2010 by prominent Cambodian individuals and experienced professionals who are well exposed to the work of non-profit organisations in areas such as democratic development, good governance, social accountability and economic development. Since then, TI Cambodia has been at the forefront of fighting the scourge of corruption in Cambodia, which is perceived to be amongst the 20 most corrupt countries in the world.

There is no doubt that Cambodian lives have greatly improved over the last two decades: the economy is thriving and the country is at peace. The percentage of the population living below the poverty line has significantly decreased. However, there is still much to be done, and these improvements will not be sustainable if corruption remains widespread. Corruption aggravates poverty and inequality by undermining the processes and structures that facilitate development. It also undermines the political system, state capacity, stability and human security by undermining rule of law.

TI Cambodia's vision is for Cambodians to live in a society that is free of corruption. To achieve this, TI Cambodia embraces a holistic approach and works together with individuals and institutions at all levels including government, business, the media, civil society and citizens.

Over the past three years, TI Cambodia has been implementing a strategy named "Together Against Corruption", focusing on *strengthening demand and participation from society, the public and private sectors to fight corruption*. This was conducted thanks to core financial support from the Swedish International Development Cooperation Agency (SIDA), the Australian Department of Foreign Affairs and Trade (DFAT) and complementary project-based support by the United States Agency for International Development (USAID) through the National Democratic Institute for International Affairs (NDI), the Canada Fund for Local Initiatives (CFLI), Oxfam as well as TI Secretariat.

Nothing feeds corruption more than apathy. Over the past few years, TI Cambodia has been working hard to stir the country's conscience and make Cambodian citizens understand that corruption has devastating impacts on society and should not be considered an acceptable way of life. To a certain extent, this strategy has borne fruit. Research conducted by International Republican Institute (IRI) shows that Cambodians today see corruption as the biggest challenge facing their country. While several years ago corruption would not even be named as a problem or publically debated, TI Cambodia's Together Against Corruption strategy contributed to stimulating more informed debate amongst civil society and prioritising this issue on the policy agenda. Understanding that corruption has become central to the way Cambodian people vote, both the ruling party and the opposition have expressed a commitment to tackle the problem head-on. Some positive reforms have already taken place, but much more needs to be done.

To build upon these successes, for its strategy 2020, TI Cambodia will seek to go beyond awareness-raising and translate the current momentum into concrete action on the demand side and sustainable reform on the supply side. This entails empowering citizens, especially youth, who are the backbone of the country, to speak up, report corruption and take action individually and collectively. It also entails supporting and building capacity of all key government institutions and agencies in their reform efforts while strengthening coalitions among civil society organisations to enable them to advocate for good governance reform and contribute to the process more productively and effectively. It entails boosting our engagement with businesses, making them

understand that running a clean business can be profitable long term and creating a platform where clean companies can be stronger together.

Finally, it requires us to expand our outreach to the sub-national level and build capacity to establish and maintain a vibrant social movement against corruption at all levels.

Specifically, TI Cambodia will seek to:

- 1. Support public institutions' capacity development and reforms in order to establish and strengthen integrity systems, promote good governance and fight corruption, including:**
 - Support the establishment of a School of Governance.
 - Provide technical expertise to support on-going reform efforts within relevant ministries, notably the Ministry of Education, Youth and Sport, the Ministry of Interior, the Ministry of Economy and Finance (on budget transparency), the Ministry of Commerce (creating and enabling a clean environment for businesses and attract investment) and Ministry of Environment (forestry governance).
 - Strengthen the existing Advocacy and Legal Advice Centre (ALAC) of TI Cambodia and expand its outreach to the grassroots level.
- 2. Strengthen the capacity of civil society and various NGO working groups in order for them to be able to push for reform more effectively, including in the areas of:**
 - Electoral reform
 - Access to information
 - Open government
 - Budget transparency
 - Judicial reform
 - The Extractive Industries Transparency Initiative (EITI)
 - Forestry governance and integrity
- 3. Empower people to fight corruption and promote integrity individually and collectively, notably through:**
 - Further anti-corruption training and youth camps.
 - The establishment and empowerment of community-based groups trained on various social accountability tools/initiatives to take action at the community/grassroots level (citizen monitoring of community development projects, infrastructure construction, forestry management, public service delivery, teachers' performance, auditing expenditures, etc at the commune-level).
- 4. Build coalition and capacity of the private sector to promote integrity in business, notably:**
 - Establish a business integrity platform (Integrity Alliance) for private companies, serving as an island of integrity for clean companies, a guarantee for investors and a driving force for improved business practices.
 - Provide training on Corporate Integrity Systems and support companies in their implementation.
 - Raise awareness on the negative effects of corruption in business, especially among Small and Medium Enterprises (SMEs).

5. Strengthen the capacity of TI Cambodia to manage and support a social movement against corruption, through:

- The establishment of provincial networks and presence at the sub-national level.
- The possibility for individuals and institutions to become “members” of TI Cambodia.
- The capacity-building of staff and key partners.

6. Provide evidence-based research and studies on corruption-related topics and timely respond to emerging corruption cases or abuse of power where TI Cambodia believes its intervention is necessary and within its mandate, including:

- Research and policy papers on corruption in the Judiciary, at school, in the health sector and service deliveries at sub-national levels.
- A second edition of the National Integrity System Assessment (NISA) and the Youth Integrity Survey (YIS) and the conduction of a Business Integrity Country Assessment.
- Public fundraising activities.

The planned objectives and activities as well as the rationale behind them are detailed in the third section of this document.

ABOUT US

Transparency International (TI) is the global civil society organisation leading the fight against corruption. Through more than 100 national chapters worldwide and an international secretariat in Berlin, TI raises awareness of the damaging effects of corruption and works with partners in government, business and civil society to develop and implement effective measures to tackle it.

The movement has been working relentlessly since 1993 to stir the world's collective conscience and bring about change. Much remains to be done to stop corruption, but much has also been achieved, including:

- The creation of international anti-corruption conventions.
- The prosecution of corrupt leaders and seizures of their illicitly gained riches.
- National elections won and lost on tackling corruption.
- Companies held accountable for their behaviour both at home and abroad.

TI is politically non-partisan and places great importance on its independence. TI alone determines its programmes and activities. Its sources of funding and spending are made transparent.

Transparency International Cambodia (TI Cambodia) is the fully-accredited local chapter of Transparency International. It was officially founded on 5 July 2010 by a number of anti-corruption activists and professionals committed to the creation of a transparent and accountable Cambodia. It has since then built a strong institution arduously fighting corruption and promoting integrity, transparency and accountability in the country.

Our Vision

We strive for all Cambodians to live in a society that is free of corruption.

Our Mission

We work together with individuals and institutions at all levels to promote integrity and reduce corruption in Cambodia.

Our Values

• Integrity • Accountability • Transparency • Solidarity • Justice • Democracy

In order for Cambodia to achieve sustainable economic development and for Cambodians to fully enjoy their rights, the country's governance system at all levels must be free of corruption, accountable and transparent. Achieving this goal requires the active participation and commitment of all segments of society.

With this in mind, over the past three years, TI Cambodia has been implementing a strategy called "Together Against Corruption", working together with individuals and institutions at all levels including government, civil society, business, media and the wider public to promote integrity and

fight corruption in Cambodia with a focus on strengthening demand and participation from society, the public and private sectors to fight corruption.

With a team of over forty dedicated members, comprised of a highly competent Board of Directors giving strategic direction and overseeing the governance aspect of the organisation as well as highly committed, dynamic and competent members of the Management Team and staff, and building upon its institutional capacity, credibility and nationwide network, TI Cambodia is in a very good position to carry out programmes in an expanded scale to drive transformation and push for improvement in the areas of governance, transparency and accountability in order to build the foundations for sustainable democratic and economic development in a corruption-free Cambodia.

BACKGROUND

SOCIO-ECONOMIC CONTEXT

Economy

Cambodia is on the right track making good progress towards achieving the United Nations (UN)'s Millennium Development Goals (MDGs). According to the Centre for Global Development's MDG Progress Index, Cambodia is ranked fourth among developing countries in their likeliness to achieve the MDGs. The country's economic growth, driven by garment exports, tourism and construction, remains strong. Cambodia is ranked among the top 20 fastest growing economies in the world according to the World Bank's 2014 Global Economic Prospects Report.

Although Cambodia has made remarkable progress in eradicating extreme poverty and hunger, most people who were considered to be lifted out of poverty have only marginally improved their living conditions. There is also a high risk that approximately three million people who are categorised as near-poor Cambodians can easily fall back into poverty, which could double the number of poor people living in the country. It should be noted that while economic growth has been strong, there is a huge gap between the rich and the poor, raising questions on how much economic growth over the past decade has impacted the lives of average Cambodian citizens, especially the poor.

The Association of South-East Asian Nations (ASEAN)'s integration into one Economic Community came into effect in early 2016, bringing both new opportunities and challenges for Cambodia. Policies and measures need to be carefully considered to ensure Cambodia benefits from this integration as much as possible and shields itself from potential negative effects. Among key challenges are pervasive corruption and a lack of adequate transparency and accountability mechanisms to enable a level playing field and fair competition among investors and the business community.

Education

While access to education has significantly improved, the quality of education remains poor compared to other countries in the region. This is partly due to a lack of proper quality control mechanisms, insufficient compensation for teachers and poor governance. Recent reforms undertaken by the Ministry of Education, Youth and Sport (MoEYS), particularly the monitoring of Grade 12 examinations, revealed the shocking reality of the quality of general education in Cambodia. In 2014, when the possibility to cheat on the final exam was heavily restricted due to increased controls and inspections, only 25% of the students enrolled for the exams had passed, as opposed to 87% in 2013. In addition, to supplement their income to support their cost of living, teachers are known to accept money from students at primary and secondary schools, while teachers at higher levels create requirements for extra hours or private classes and charge money for it. All of this has a negative impact on the quality of education and compromises the ability of the poor to get fair and equal education opportunities.

Natural Resource Management

Cambodia is rich in natural resources, especially in forestry, minerals and fisheries. Although legal frameworks and a strategic plan are now in place for natural resource management, protected areas and forests remain under severe pressure from illegal logging, encroachment, economic land concessions, and an insufficient numbers of rangers. Fishery, as a primary source of food and income for farmers, has also suffered and is heavily under threat from illegal fishing. The exploitation of natural resources not only results in inequitable distribution of benefits to the people dependent on the land for income and resources, but also poses less visible long-term threats as it accelerates climate change. This acceleration will affect people's livelihoods, especially the poor and rural population who are most dependent on natural resources and agricultural production. Sustainable development requires effective management of natural resources, which can only be achieved through the promotion of good governance, transparency and integrity.

Foreign assistance

Cambodia is undergoing a transition from being classified as a Low Income Country (LDC) to Middle Income Country (MIC). It is very likely that foreign financial assistance will decrease while access to concessional finance will be limited. This means that Cambodia will have to find alternative sources of funding to ensure its socio-economic development. In fact the likelihood of Cambodia's transition from LDC to MIC is due to the change in its income status but does not necessarily reflect the actual living standards of average citizens. This requires consideration to avoid falling into the middle-income country trap.

While Cambodia is still eligible to get more loans from foreign countries to supplement its national budget, getting too many new loans can create a debt burden and increase risks in the long term, unless the loans are rightfully invested in infrastructure and institutional capacity development to enable the Government to increase revenue from tax collection and other industrial sectors in a sustainable manner. However, effective and efficient management of both loans and income requires strong institutionally-embedded anti-corruption mechanisms and practices that ensure transparency and accountability.

Governance

The shadow of Cambodia's recent past has shaped its contemporary political, societal, cultural, and economic context. The characteristics of these four foundations contribute to the weaknesses within and across the country's governance systems and institutions. Whilst the governance system has been rebuilt on the principles of democracy, as enshrined in the Constitution (1993, last amended in 2008), the foundations upon which the institutions depend have fostered a hierarchical system of political patronage in which corruption is commonplace. The lack of social security in the post-Khmer Rouge system may have contributed to a reliance on such patron-client relations for survival and protection. Today, these patronage systems run both vertically and horizontally across government ministries. Moreover, political patronage is allowed to continue largely unimpeded for multiple reasons, including: the hesitancy of citizens to challenge the Government stemming from the historical paternal-child relationship between the State and citizenry; the awareness of harsh punishments for previous dissenters and Government critics; and limited understanding of, and commitment to, social accountability among civil society organisations.

Further contributing to the limitations of the current governance system is the killing of a quarter of the population, including the middle class, by the Khmer Rouge, which left few educated people capable of running effective governance institutions after the fall of the regime. With insufficient human resources, institutions may be constrained in their abilities to ensure the highest standard of governance, including implementation of mechanisms for integrity and accountability.

CORRUPTION IN CAMBODIA

A snapshot

Corruption is defined by TI as the abuse of entrusted power (be it political, economic or social, within or outside Government) for private gain. Corruption can involve a wide range of activities – kickbacks, bribes, embezzlement, fraud, nepotism, negligence of duty, misuse of public or institutional funds and extortion.

Corruption has long been an endemic problem in Cambodia, pervading virtually all aspects of public life. Both petty and grand corruption are widespread, with a culture of patronage deeply entrenched in society. In a developing country like Cambodia, the impact of corruption is severe: it aggravates poverty and inequality; slows economic growth; undermines the political system; and affects State stability and human security.

The position of Cambodia in TI's Corruption Perceptions Index over the past years provides evidence of the scale of the problem. Cambodia ranked 150th out of 168 countries in 2015. The ranking for Cambodia is based on data sources from credible institutions including the World Bank, the World Economic Forum, the World Justice Project and four other sources with views from experts and professionals living in Cambodia. Cambodia ranked as one of the 20 most corrupt countries in the world and region, scoring right below Myanmar and Lao PDR, landing in the last place as the most corrupt in ASEAN in 2015. Undoubtedly, the significant drop of the score from 25 points to 10 points for Cambodia's adherence to the rule of law which was evaluated by the World Justice Project Rule of Law Index 2015 is the only main reason for holding Cambodia's score and ranking of Cambodia in CPI 2015 from improvement. Other sectors seem to have performed quite well and the economic outlook is looking better. Cambodia gained 8 points from the World Economic Forum Executive Opinion Survey (EOS) 2015 and 9 points from the Political and Economic Risk Consultancy Asian Intelligence 2015 while other indexes remained the same. This signifies that Cambodia is generally moving in the right direction while judicial reform is urgently needed and all relevant stakeholders need to step-up efforts to enhance access to justice for the population at large.

Cambodia also ranked near the bottom out of 102 countries surveyed in the World Justice Project's Government Openness Index 2015, scoring last in mechanisms through which complaints about government officers or public services can be lodged, and ranked 98th in sanctions for officials' misconduct.

Corruption is often singled out as the greatest deterrent to business and investment in Cambodia, especially from Western countries. Cambodia ranks 127th out of 189 economies in the World Bank's Ease of Doing Business Index 2016.

Cambodia is also the sixth most at risk country for money laundering and terrorist financing in the world according to the 2015 Basel Anti-Money Laundering Index.

TI Cambodia's NISA, an in-depth study of 13 key institutions published in September 2014, showed that Cambodia's integrity system is weak. While the overall legal framework is relatively robust, safeguarding independence and accountability of institutions in theory, this seldom translates into practice. The integrity system requires considerable improvement in order to uphold the rule of law, ensure sustainable development and a good quality of life for the population.

Based on the study, the Judiciary and law enforcement agencies were found to be the two weakest institutions in Cambodia. Both are highly susceptible to bribery and external influence. As a result,

well-connected individuals are often allowed to go unpunished, while cases of politically-motivated prosecutions are reported.

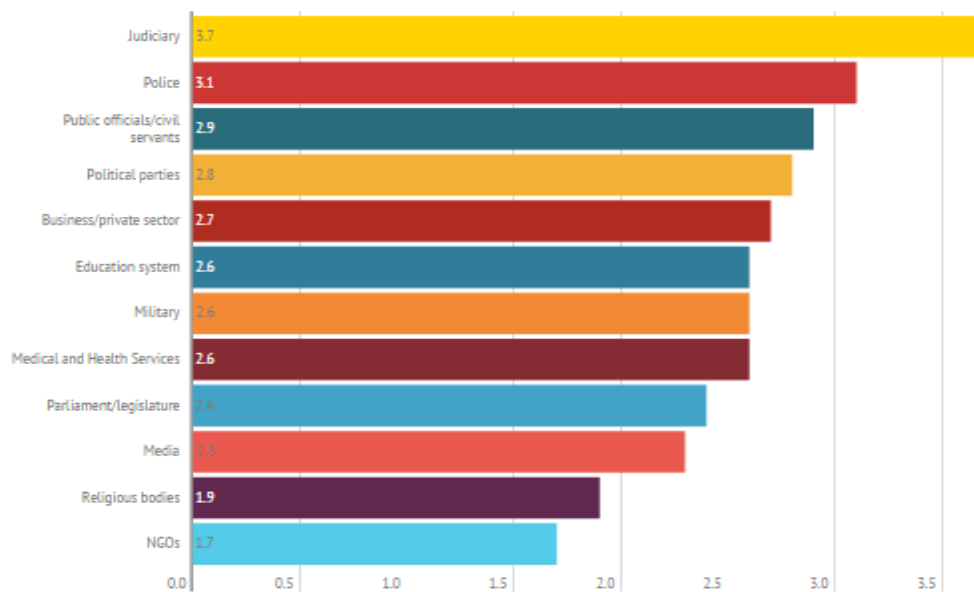
The NISA report also determined that petty corruption remains commonplace across both the private and public sectors, leading to situations where those who can afford to pay more receive preferential treatment, exacerbating existing inequality and injustice.

Transparency International's Global Corruption Barometer 2013, a survey exploring the views of Cambodians on corruption and the Asia Foundation's survey of the Cambodian electorate called "Democracy in Cambodia – 2014" showed that Cambodians considered the Judiciary to be the most corrupt/least trustworthy institution, followed by the police (and the National Election Committee for the Asia Foundation's survey), both of which are law enforcement institutions expected to protect and give justice to the citizens. These sectors are where bribes are most common.

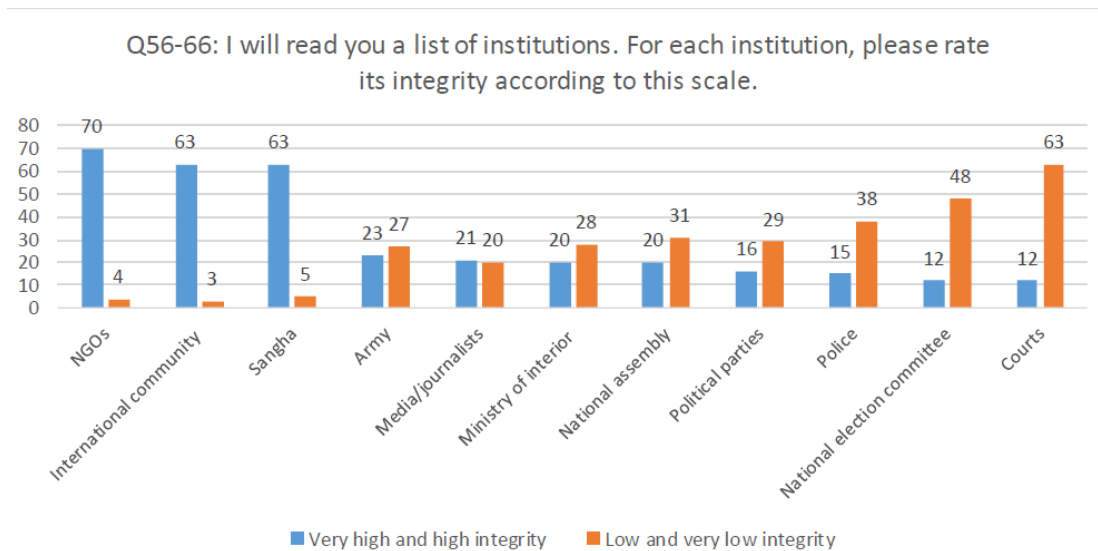
These findings were corroborated in TI Cambodia's Youth Integrity Survey.

Global Corruption Barometer 2013: Perceptions of corruption, sector by sector

Global Corruption Barometer 2013: Perceptions of Corruption, sector by sector



Scale 1-5, where 1 means not all corrupt, 5 means extremely corrupt.



Recent reforms and the way forward

The Cambodian Government has prioritised reforms to ensure the development of a well-governed public sector. Notable improvements have been made in terms of decentralisation and sub-national democratic development. The One Window Service Office (OWSO)—a sub-national level initiative that transparently displays official fees for public services on the wall of public offices and grants access to all services at one location—is one example of change existing in the public sector.

Both the ruling Cambodian People's Party (CPP) and the leading opposition's Cambodia National Rescue Party (CNRP) claim to prioritise anti-corruption. The ruling party initiated a number of anti-corruption reforms including passing the Law on Anti-Corruption and establishing the Anti-Corruption Unit (ACU) in 2010. The opposition party publicly signed an anti-corruption pledge at a ceremony organised by TI Cambodia.

Despite the commendable features of the Executive and political parties, both institutions need to act on crucial reforms to ensure they are fully accountable to the plurality of voices in the society that they claim to represent. The ruling party has been criticised for its close ties to wealthy elites, whilst overlooking the interests of other social groups. Patron-client relations provide an unhindered nexus between the Government and business executives, centralising major procurement contracts, economic land concessions and access to resources within the control of a narrow group of people. Only by addressing these issues can the Executive and political parties progress into strong, autonomous, egalitarian institutions. The long-term effectiveness of both parties' public commitment to anti-corruption is yet to be seen.

The amendment to the Law on Anti-Corruption regarding the financial resources strengthened the legal provisions applicable to the Anti-Corruption Unit and ensured that it has an autonomous budget. Moreover, the Anti-Corruption Unit also undertook numerous activities to educate public servants and citizens about corruption and how to fight it using the available tools. Specifically, the institution contributed to the development of an integrity course as part of the national school

curriculum and helmed workshops to disseminate the Law on Anti-Corruption across the country. Challenges, however, remain, restricting the Anti-Corruption Unit from effectively undertaking its oversight role in practice. The institution is viewed to be politicised and its independence from the Executive is limited.

The step taken by the Ministry of Education to crack down on cheating and corruption during last year's grade 12 exams has made students realise that it is not acceptable to cheat and bribe their way into university. This effort needs to be taken further to ensure the issue of corruption in education will be tackled more holistically, starting with better training and more liveable salaries for teachers on top of other reform efforts to improve the quality of education.

The creation of anti-corruption commissions within the National Assembly and the Senate is also a very welcome step, providing important institutional mechanisms to address corruption. However, the capacity of these institutions needs to be increased in order to undertake activities that could lead to concrete results and more effective measures to prevent and combat corruption in Cambodia.

The Ministry of Commerce has taken some measures to improve transparency and simplify procedures, including the online systems for business registration. This alone, however, will not be enough to earn the confidence from multi-national corporations or attract more foreign direct investment, especially from Western countries.

The Ministry of Economics and Finance has undertaken a number of reforms in a bid to reduce corruption in the customs and tax sector, which resulted in a noticeable increase in the revenue generated from customs and tax. The Ministry also has made an effort to disseminate information on the national budget and fiscal data at a macro level through annual consultative workshop with relevant stakeholders and upload more information on its website. This is an encouraging outcome of the reforms, but more work needs to be done to ensure effective and efficient public financial management, especially in the areas of procurement oversight and budget transparency.

The Government has been trying to address the issues of ghost civil servants (officials getting salaries paid on the Government payroll although they do not actually work or even exist). One of the measures is to require all Government officials to obtain their salary through an individual bank account. Having robust human resource management systems, including performance reviews against clear terms of reference for the civil servants, will help ensure quality of their work and determine the number of employees needed in each institution to avoid over-staffing and superfluous expenditures on salaries and retirement pensions.

The root of the problem

A number of structural elements can be held responsible for enabling corruption in Cambodia to go unchallenged and in some instances, flourish:

Inadequate legal, policy and regulatory frameworks and poor law enforcement. As analysed at length in TI Cambodia's 2014 National Integrity System Assessment, Cambodia's integrity system is too weak to uphold the rule of law and ensure sustainable development and high living standards for the population at large. Each of the 13 institutions studied suffer from a lack of resources and are unable to function independently from both internal and external influences. No clear mechanisms ensuring transparency, accountability and integrity are in place. Institutions are incapable of performing their core functions and duties effectively. While the legal framework is relatively robust within some institutions, there are significant implementation gaps. In the long-term, this situation of inadequate legal, policy and regulatory frameworks and poor law enforcement will lead to a lack of social accountability. Law enforcement agencies, the police and the Judiciary, are often singled out

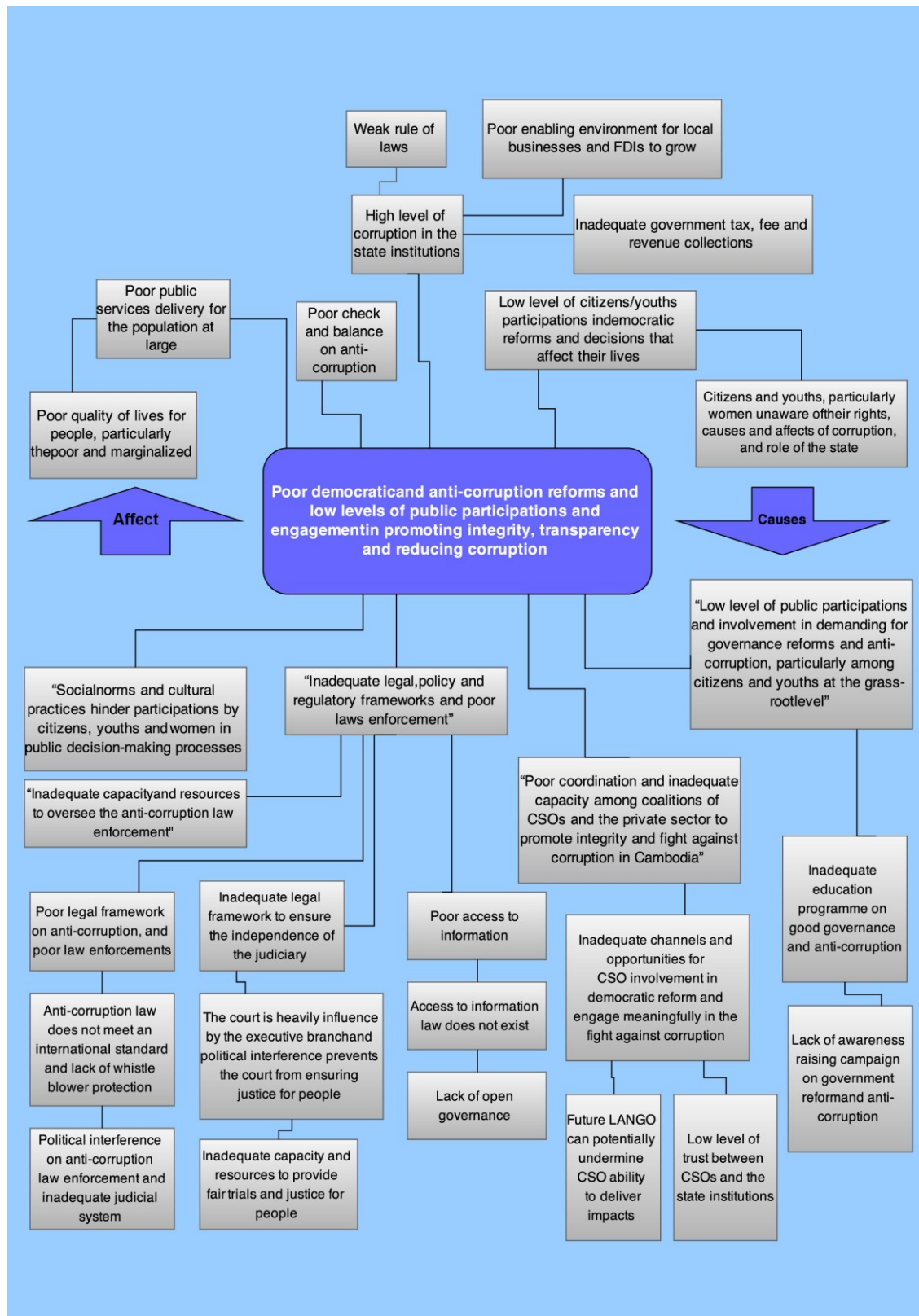
as the most corrupt institutions by Cambodians—this was illustrated in TI Cambodia’s recent surveys on youth and Small and Medium Enterprises (SMEs). This has led to a social environment where bribing officials and police for preferential treatment is common, granting impunity to those who can afford it and leaving the poor without access to justice. A key to curbing corruption is to strengthen integrity mechanisms in public institutions and restore public trust by improving social accountability.

Low levels of public participation and involvement in demanding good governance and anti-corruption reforms, particularly among citizens and youth at the grassroots level. Cambodia has a young and dynamic population. It is estimated that over 65% of the population is under the age of 30. This demographic change provides a very promising perspective for Cambodia. However, a number of barriers have deterred citizens from fully holding their government and people in power accountable. In the recent Youth Integrity Survey (YIS), 71% of youths said they had no or little knowledge of the government’s role and of the regulations in place to promote integrity and prevent corruption. The study also showed a lack of public trust in public services and state institutions. A recent study conducted by UNDP and BBC Media Action also confirmed the lack of civic education and participation of citizens and youth in social, political and economic affairs. To be able to improve governance in Cambodia, citizens have to be aware of their rights and duties and the responsibilities of the government. The low level of public participation impacts the effectiveness of public service delivery, especially at the local level. Improved public awareness and participation will push the reform agenda.

Social norms and cultural practices hindering participation by citizens, youth and women in the public decision-making processes. Social norms and cultural complexity in Cambodian society present both advantages and disadvantages. Nonetheless, some social and cultural norms have, to some extent, limited the potential for democratic reform. The hierarchical structure in both the family and workplace have limited the space for people to question their leaders, fully express their views and meaningfully participate in the decisions that affect their lives and society as a whole.

Poor coordination and inadequate capacity among coalitions of CSOs and the private sector to promote integrity and fight against corruption in Cambodia. There is no doubt that civil society organisations and the private sector have played a very important role in the development and governance reform processes in Cambodia over the past decades. CSOs have been an alternative service provider and achieved so much to the extent that they have, at times, created a culture of dependency in Cambodia. Critics argue that public institutions are not effective enough in providing services to people because they rely too much on development partners and CSOs to do the job on their behalf. Although the space for CSOs to operate their work is relatively open, more effective coordination needs to be re-enforced to ensure that collective voices and concerns are heard by the state and necessary actions are taking place to address those concerns. There also seems to be a lack of mutual trust amongst CSOs and government institutions. This mistrust has, in fact, undermined common efforts and interest to foster democratic reforms in Cambodia. Therefore, there is a strong need to enhance coordination and capacity of CSOs and the private sector to constructively engage with the government institutions in democratic reforms and in the fight against corruption. Currently CSOs’ goals are often overlapping and this can lead to competition instead of cooperation, making CSOs unable to speak with a collective voice.

Problem tree



Strategy 2020



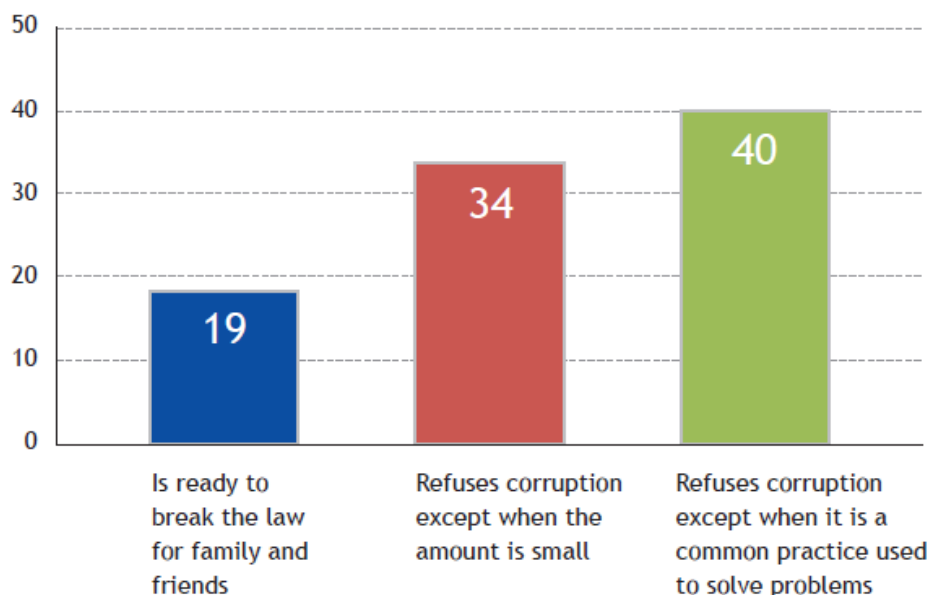
Momentum for change

The prospect of transformation in Cambodia has become more realistic than ever before. While foreign donors, the international community and businesses have contributed to Cambodia's progress over the past 30 years, the most recent drivers of change are the country's own people. Cambodians are exercising their political voice more than ever before, pushing for the government to do better, and embracing modern technology. With more than 65 per cent of the population under the age of 30, youth provide a great opportunity for further social and political transformation. While the older generations tend to see corruption as an inevitable fact of life, youth are more open to wide socio-political change and need to be actively engaged to help build zero-tolerance for corruption.

The most recent survey on youth attitudes toward corruption and integrity conducted in 2015 by TI Cambodia confidently confirms this prospect and optimism. 67 per cent of the youths surveyed said they are willing to report corruption while the overwhelming majority believe that they can play a major role in the fight against corruption. While these findings give hope that youth are change-makers, there are elements of risk if they are not guided and influenced in the right direction by effective education and leadership. While almost all respondents understand that corruption is a major barrier to the country's development, they face real-life challenges in living up to their own standards. A worrying number of respondents reported experiencing corruption in the 12 months prior to the survey. 69 per cent of those who had contact with the police faced corruption, and one in two respondents did so while trying to get a document or permit or pass an exam at school.

Many believe that a person of integrity can commit corruption in certain circumstances—when the amount is small, when it benefits their family or friends or when it is widely used to solve a problem (see chart below).

Percentage of youths agreeing that a person of integrity...



Many respondents admitted they were ready to engage in corruption if it benefits themselves, their families or friends. A staggering 59 per cent said they were ready to pay a kickback of 10-20

percent of their future salary to a person who can secure them a job, which hints at the alarming reality of recruitment practices in Cambodia, while half of those surveyed believe it is acceptable to give an unofficial payment to a doctor or nurse to receive better medical service and treatment. This indicates that integrity is in crisis and requires immediate intervention to avoid the continuation of practices and attitudes carried over from previous generations.

ACTIVITIES AND IMPACT TO DATE

OUR ACTIVITIES AND ACHIEVEMENTS (2012-2015)

Goal 1: Diagnose corruption issues and use findings as a reference to stimulate more informed debates and formulate further anti-corruption projects

Why it was needed. Corruption is a complex problem that thrives on confusion and secrecy. Knowledge is a key component in the fight against it. While corruption was increasingly garnering attention in Cambodia, comprehensive, high-quality academic research was needed to refine understanding of the phenomenon, foster informed debates, help civil society adopt a targeted approach to tackling corruption and devise effective anti-corruption policies.

What we did. Bolstered by TI Secretariat's expertise and networks, we developed comprehensive analysis and research on corruption in the Kingdom and developed evidence-based advocacy for reform.

How we did it. The **National Integrity System (NIS) Assessment 2014** was developed by TI Secretariat as a comprehensive means of assessing a country's anti-corruption efficacy sector by sector and has been applied by various TI chapters throughout the globe. In September 2014, after two years of work, we released the NIS Cambodia, the first comprehensive study on the extent and root causes of corruption in the country. Scanning 13 pillar institutions, it provides a full diagnosis of the state of the governance system. Key policy recommendations were formulated based on the findings, seeking to engage government, donors and civil society to push forward much-needed reform of the Judiciary, the Anti-Corruption Law and the public sector as well as the passing of an Access to Information Law and Whistle Blower Protection Law. The study has stimulated more evidence-based debates on anti-corruption and governance reform. The findings and recommendations are widely referred to advocate for anti-corruption reform and develop their anti-corruption strategy.

Youth Integrity Survey: A countrywide survey of 1,200 youths, the YIS is the first study to explore young Cambodians' perceptions and attitudes toward corruption and integrity. The survey follows a methodology developed by TI Secretariat. The findings are expected to help government bodies and organisations — including TI Cambodia — deepen their understanding of Cambodian youth and identify key areas to target anti-corruption initiatives.

Online resource library: We compiled existing studies related to good governance and corruption in Cambodia and a library is now available for the public to easily browse and access corruption-related resources.

Goal 2: Build and support partnerships and coalitions of civil society organisations to fight corruption more effectively

Why it was needed. Corruption is a crosscutting issue that is often the root cause of other development and human rights challenges. Fighting corruption in Cambodia remains a risky and arduous task and no organisation or individual can do it alone. Cooperation from state institutions,

CSOs and individuals from all spectrums of society is needed to put the issue on top of the policy agenda.

What we did. We forged strong coalitions and partnerships driving engagement from all segments of society, including business, CSOs and government, helping to build momentum for tangible reform.

How we did it. With the 2012 **National Anti-Corruption Conference (NACC)**, we drew together a wide range of stakeholders and donors willing to tackle corruption.

Grassroots level: We worked together with grassroots organisations to raise public awareness of corruption, provided training on the Anti-Corruption Law and anti-corruption tools and encouraged monitoring initiatives at the community level. We also conducted a grassroots campaign against corruption and impunity.

National level: We were engaged with the Anti-Corruption Unit to conduct UNCAC review for Cambodia, resulting in some key recommendations for anti-corruption reform. We started working with the newly created anti-corruption commission of the National Assembly and have built relationship which has led to signing an MoU with the Ministry of Interior. We are also seeking a partnership with the Ministry of Commerce on a Business Integrity Alliance. We are core members of NGO working groups on electoral reform, access to information and budget transparency and are pushing for reform in these areas. Together with our partners we have also actively advocated for a more enabling environment for civil society, notably concerning the draft Law on Associations and Non-Governmental Organisations and Cyber Law and are pressing for Cambodia to consider joining the Open Government Partnership initiative. We developed policy paper/brief on the Whistle-blower protection law as assistance and inputs for the National Assembly and the Anti-Corruption Unit. For the past 3 years, we have brought together and built a coalition of more than 300 CSOs and 25 media institutions to demand collectively for social accountability and anti-corruption.

National Conference on Integrity and Accountability in Education: Together with the Affiliated Network for Social Accountability in East Asia and the Pacific (ANSA-EAP), we conducted a study on “School’s Textbook Leakages” and used the findings to stimulate debate on the integrity and accountability of Cambodia’s education system. The findings and conference pressured MoEYS to issue a Prokas to confiscate school textbooks from the sale stores and ban them from public stores. We engaged with the Ministry of Education, Youth and Sports and other key stakeholders.

Election monitoring and electoral reform: In cooperation with the Coalition for Integrity and Social Accountability, we deployed over 900 election observers across the country to conduct a sample-based observation of the 2013 national election and published a widely read report compiling the findings. Subsequently, we have actively engaged in the electoral reform debates and advocacies, as we believe political corruption is the root cause to other forms of corruption.

Business Integrity: We have started working directly with businesses to help them take action to stop corrupt practices and limit their exposure to the costs and risks associated with bribery. We provide confidential services tailored to suit the needs of individual companies and are seeking to engage with corporate stakeholders to build a collective action coalition and find champions for the promotion of business integrity. We actively engaged with more than 160 companies, business associations, SMEs and major chambers of commerce to promote corporate integrity and enhance transparency in the business community in Cambodia. We conducted a survey to explore the perceptions of SMEs’ CEOs on corruption and how it impacts their business operations in Cambodia. The report was published and widely distributed during a National Conference in May 2015.

Goal 3: Engage citizens and young people in promoting integrity more actively

Why it was needed. For many Cambodians, corruption is seen as an inevitable fact of life, with the public sector perceived as distant, corrupt and unaccountable. Building up civic demand for anti-corruption and reducing the accountability gap between citizens and policy makers is critical to push for governance reform. Young people, in particular, can play a leading role in challenging the status quo and thus need to be actively engaged and empowered.

What we did. We educated citizens and youth about the harmful effects of corruption and equipped them with the knowledge and tools necessary for them to get involved in the fight against it. We built and empowered a vibrant countrywide youth network of over 8,000 anti-corruption enthusiasts and encouraged them to take concrete action.

How we did it. Media: We promoted integrity and transparency through weekly live radio shows. We trained aspiring and professional journalists to investigate and report on corruption and encourage debate on the abuse of power through our annual young professional journalist training. We also partnered with an online news agency to promote integrity and anti-corruption through online articles.

ALAC and Bribespot: We established an Advocacy and Legal Advice Centre (ALAC), a mechanism now available in more than 60 countries that enables citizens to report corruption and receive free legal advice on how to pursue their corruption-related complaint. We work in partnership with law enforcement agencies and the parliament to enable these complaints to be carried forward. We also partnered with Bribespot, an international mobile and web application where citizens can pinpoint their encounters with corrupt officials in one click. Nearly 320 people have contacted the ALAC, since its establishment in late 2013, to seek consultation and legal advice and report corruption and file complaints. 105 cases are corruption cases. 5 cases were referred to the anti-corruption agencies and one case was solved while others are being investigated. While the result for ALAC came below our expectation, this was also due to the sensitivity of corruption and the absence of Whistle-blower protection law which makes people afraid of reporting corruption.

Youth: We raised awareness of corruption amongst youths and enhanced their capacity to promote integrity and fight corruption in their communities. We did this through public workshops at universities, schools and institutions, young leaders' training, youth camps and other youth-led initiatives. We also trained and empowered youth in the provinces on how to use ICT tools (social media, blogs, apps) to promote integrity and accountability. Every year, on International Youth Day, youths were provided the opportunity to express their will to change society for the better through songs, poems, arts and debates. Over the past three years, we have built a network of over 10,000 citizens and youth and more than 5,000 of them are actively engaging with TI Cambodia. These youths will be the foundation for TI Cambodia's Citizen Movement against Corruption. Youth Empowerment for Transparency and Integrity (YETI)'s alumni was created to keep youths' momentum against corruption. As a result of the International Youth Camp organized by seven TI Chapters in the region, more than 30 young leaders were trained and empowered to take action against corruption. A regional anti-corruption youth network called the "Youth Movement for Transparency in Asia (YMTA)" was created to ensure the sustainability of the movement and implement future anti-corruption activities, which can benefit their own country and region. 6 local youth-led projects and a joint youth initiative on "Arts for Transparency" have been implemented, and empowered hundreds more youth in the region. YMTA will be the platform in which anti-corruption will be advocated at both country and regional levels. In the future, YMTA will be expanding to other countries and regions.

Education: We cooperated with the Anti-Corruption Unit to raise public awareness of the causes and effects of corruption on society, produce anti-corruption advocacy video spots, posters, stickers and integrate anti-corruption into the school curriculum for grades 10, 11 and 12. 140,000 copies of student textbooks and 5000 copies of teacher textbooks were printed and disseminated to schools all over the country. The curriculum is now being piloted at schools. Together with the Anti-Corruption Unit and civil society organisations, we conducted an annual National Campaign on Anti-Corruption to mark International Anti-Corruption Day on 9 December. We are also collaborating with Khemarak University to establish its Department of Integrity. We developed a training manual on integrity, transparency and the causes, impact and forms of corruption, as well as the roles of youth and other stakeholders in the fight against it. Through our awareness raising campaigns, attitude and perception of citizens and youths on corruption have changed. More and more people are no longer tolerating corruption or accepting it as a way of life, in fact, most of them have proposed solutions for change. 21 educational video clips/spots on corruption, integrity and social accountability were produced and broadcasted on TV and online platforms. Through MoEYS, 3 youth forums were conducted, with participation of over 1,000 young people in total, where social accountability and anti-corruption were taught among other topics.

Media: We partnered with key radio broadcasters, CCIM and WMC, to raise public awareness on civic education, integrity and anti-corruption. Through this radio talk show, over 850 people called into the programme to raise their voices and concerns with regard to the harmful effects of corruption on their lives and society and offered some solutions for positive reform. We worked with media experts to enhance the capacity of journalists and trained them on how to write articles/investigation reports related to corruption. 3 generations of over 90 young journalists were trained, leading to an increase in the number of articles and news on corruption-related issues in both Khmer and English languages. We also partnered with an online media “Tmey.Tmey.com” to raise public understanding on anti-corruption.

Anti-Corruption Card: With the goal to foster a real social movement against corruption, we produced and distributed anti-corruption cards for citizens to prove their commitment to the fight against corruption and reached out to businesses across Phnom Penh for them to show their support to the movement and provide discounts to card-holders. 15,000 anti-corruption cards were produced for the purpose of allowing citizens and private companies to exhibit their strong commitment in the fight against corruption. Over 7200 people are now holding the anti-corruption cards and expressing their commitment in the fight against corruption.

Garment workers: To ensure gender equality and that TI Cambodia’s programme benefits women, a gender-oriented project was developed in partnership with a well-known union called “the Coalition of Cambodian Apparel Workers Democratic Union (C.CAWDU)” to educate garment factory workers on corruption and how to report it. A Training-of-Trainers (ToT) session was conducted for CCAWDU staff and they further conducted 14 training sessions to more than 337 garment factory workers (180 females, 53%) on workers’ rights, integrity, transparency and anti-corruption.

Commune Councils: We collaborated with the Cambodia Civil Society Partnership (CCSP) and World Renew to train commune councils to promote integrity, transparency and fight against corruption at the commune level. We conducted 8 training sessions to 292 commune councillors, local authorities and citizens on good governance and social accountability.

Goal 4: Build governance foundations, operational structures and processes for the establishment of a TI National Chapter in Cambodia

Why it was needed. To establish ourselves as a credible and effective organisation leading the fight against corruption in Cambodia, we needed to build solid organisational foundations and equip ourselves with top-notch skills and expertise.

What we did. TI Cambodia made great effort to establish and strengthen institutional policies and mechanisms and built its capacity to become a fully accredited National Chapter of Transparency International in October 2014. TI Cambodia is now the second-biggest chapter in Asia-Pacific after TI Bangladesh. TI Cambodia is also active and highly visible in the regional anti-corruption agenda since its Executive Director was appointed as the Regional Coordinator for Asia and the Pacific of the UNCAC Coalition, as member of the Asia Pacific Youth Working and a member of the Advisory Committee for the Asia Pacific Region of Transparency International.

How we did it. We mobilised eminent individuals to join and support our anti-corruption efforts. Tapping into the global expertise and resources of the worldwide TI movement, we built up the knowledge and skills of our core staff through training and TI chapter exchange visits. We also established solid governance frameworks and policies that enabled us to gain credibility and boost our efficiency.

IMPACT

The issue is now being discussed

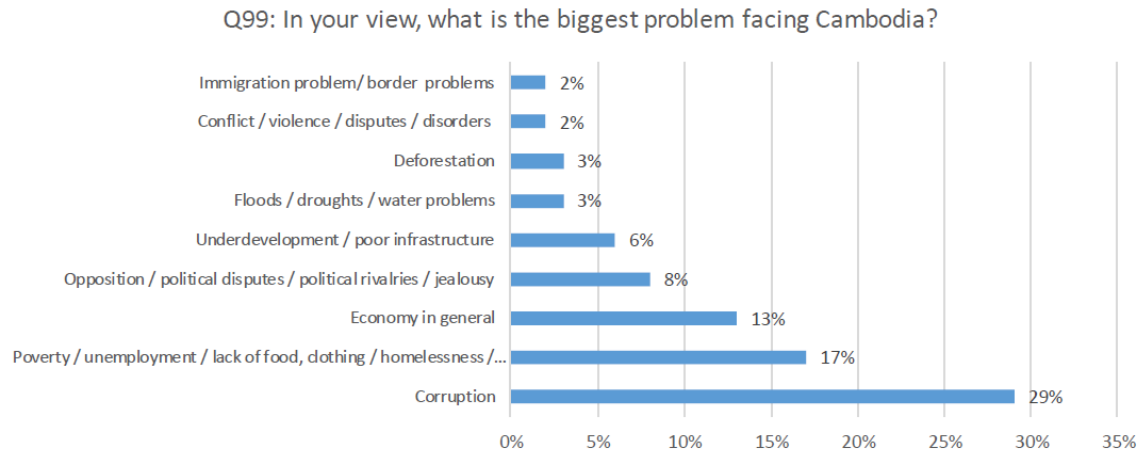
When TI Cambodia started its work in July 2010, the context was completely different from the current situation. Back then, the demand from the public for the Government to tackle corruption was still very low and only a few people (politicians and prominent anti-corruption activists) dared to speak publicly against corruption. There were very few articles in the media that mentioned corruption directly. The word “corruption” was then very sensitive and was considered very difficult to express in public, especially in the presence of the Government officials. Often, the government officials would use the word “inactiveness” instead of corruption while civil society organisations (CSOs) would use campaign slogans under a symbolic name such as “clean hands campaign” or “good governance project”, etc. Furthermore, when TI Cambodia held workshops or forums, it had to work very hard to persuade people to speak about corruption. This has now drastically changed, as more and more people are speaking up publicly against corruption and the word is much less taboo. At forums or workshops, TI Cambodia now has to work hard, at times, to manage the amount of people willing to express their anger and frustration about corruption. The issue is getting increasingly covered in print and online media as well as on the radio.

Back then there were not enough studies or research about corruption to stimulate debate and formulate concrete policy recommendations, apart from a household survey on corruption conducted by Pact Cambodia in 2006. The only comprehensive survey at the time, it showed that people thought that “corruption was the way of life” or the normal way of making a livelihood. This is no longer the case. Corruption in Cambodia has now been thoroughly researched, explored and assessed. Studies, reports and opinion surveys have served as a reference for fruitful debate among politicians and all spectrums of society and were used as evidence for advocacy. These have also been used as a baseline for the formulation of policy recommendations to the Government. Moreover, these studies and assessments are referred to as authoritative sources for public education and raising awareness, notably by the mass media reaching out to millions of Cambodians.

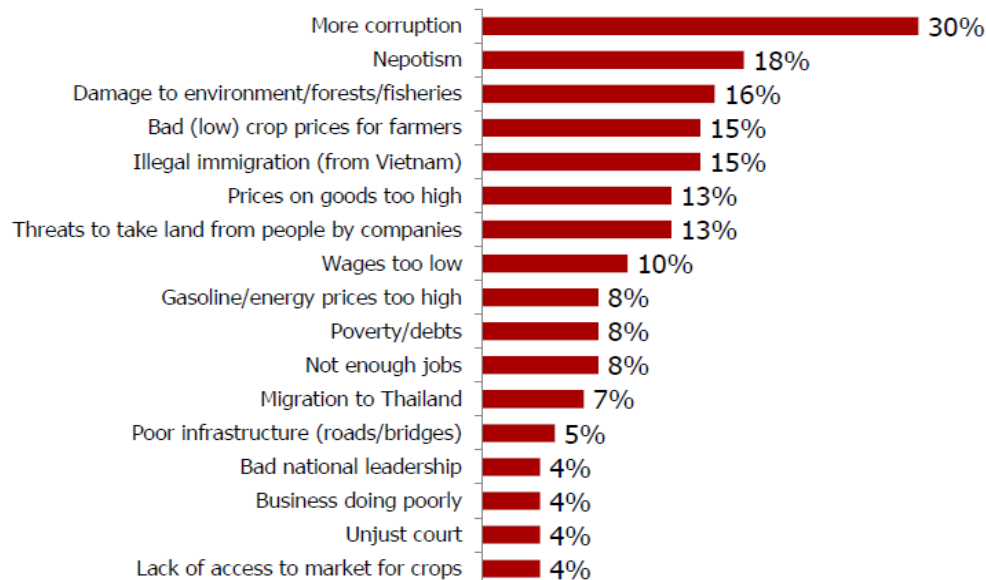
A change in perceptions and attitudes

It is undeniable that perceptions and attitudes of the Cambodian people toward corruption have changed over the past few years. Recent surveys conducted by the International Republican Institute (IRI) in 2013 and the Asia Foundation in 2014 revealed that people considered corruption to be the biggest problem facing Cambodia and the chief reason why the country was headed in the “wrong direction”.

Asia Foundation: Democracy in Cambodia—2014



What are some reasons why you feel the country is headed in the wrong direction?



The YIS indicates that 99 per cent of youth believe that corruption is a major obstacle to development. Youth comprise 65 per cent of the total Cambodian population and represented more than 30 per cent of registered voters in 2013.

More and more people, especially youth, are less tolerant towards corruption or malpractices which they used to see as a way of life a few years back.

Arguably, this change in attitudes and perceptions among the Cambodian people is greatly due to education programmes and awareness-raising campaigns on corruption and its devastating impact on society conducted by TI Cambodia and its partners—the Anti-Corruption Unit, CSOs and the media.

Corruption at the centre of the political debate

The change in perceptions certainly has had an impact on the way people voted in the 2013 national election, which saw a significant decline in the support for the ruling party, whom the people naturally held responsible for the systemic corruption in Cambodia.

Corruption has thus become a central issue in elections. Contesting political parties must demonstrate their commitment to push forward anti-corruption policies and effective measures, while the ruling party and Government must demonstrate that the reforms they have undertaken are effective and lead to the tangible improvement of the public administration and living conditions of the people.

It is important to clarify that impacting election results has never been and will never be part of TI Cambodia's objective and mandate. TI Cambodia works against corruption, not against the government.

However, when corruption becomes one of the most critical issues for voters, the way they vote is naturally influenced by their knowledge of the extent of corruption, who commits it and which parties or candidates are “clean” and have committed to tackle it. TI Cambodia's work naturally contributes to driving political debates in this respect, which unavoidably may lead to some political impact.

The people are now demanding change and improvement within the public administration. This significant increase in the demand from the people has sent a clear message to the Government that they cannot continue to ignore corruption and maintain business as usual. The government has responded with an anti-corruption message from the Prime Minister, a commitment to deepen reforms in various key public sectors including education, business, tax collection, public service delivery and civil servant administration.

This provides us with a great opportunity to continue and expand our project activities in order to support the Government's reform efforts while empowering civil society, private sector and citizens, especially the youth, to actively participate in the fight against corruption and in the promotion of integrity.

EVIDENCE OF ATTRIBUTION

Impact from the Research Advocacy Programme: The National Integrity System Assessment (NISA) report was officially launched on September 9, 2014. Following the publication of the report,

a number of government institutions have implemented varying degrees of reforms. These include the National Election Committee, Anti-Corruption Institution, the Ministry of Commerce and the Ministry of Interior. Some changes that have taken place within these institutions closely match with what were recommended in the NISA report. However, it is difficult to produce a clear-cut, “evidence-based” conclusion that the reforms were directly due to the NISA, precisely because none of the institutions undertaking the reform publicly gave credit to this document.

Nonetheless, we maintain that this document has contributed to the reforms. Prior to the launch of the report, TI Cambodia has conducted consultations with a wide range of stakeholders, including the aforementioned government institutions, opposition party and civil society organizations. These meetings served to inform these key actors about the issues in each assessed institution and specific ways to reform it.

These dialogues were constructive and impactful. In the case of the National Election Committee (NEC), for example, recommendations to reform this body were happily accepted and endorsed by the main opposition party, Cambodia National Rescue Party (CNRP). The CNRP later on played a key role in restructuring the NEC to its current form, through negotiation with the ruling Cambodian People’s Party. The CNRP also endorsed the report’s recommendation on the need for whistleblower protection legislation in Cambodia. Since its creation, the National Assembly’s anti-corruption commission, chaired by lawmakers from the CNRP, has been pushing the Anti-Corruption Unit to establish this law. The head of this commission has always made it clear to TI Cambodia that the commission’s effort has been informed by this NISA document.

Impacts from Partnership Building and Citizens and Youth Engagement Programmes: To understand the impact of the programmes, TI Cambodia conducted an internal final evaluation, using Focus Group Discussions (FDGs), in-depth interview and the Most Significant Change (MSC) methods. The results of this assessment indicate that the programmes have produced many positive impacts.

We learn through FGDs with youth in Phnom Penh, Battambang and Kampong Cham that most youths involved in TI Cambodia’s activities such as Youth Camp and Young Leader Programme (YLP) are highly active in fighting corruption. The youths interviewed also said they gained a great deal of knowledge and experiences through TI Cambodia’s projects. This knowledge allowed some of them to successfully manage and implement TI Cambodia’s small grant projects, which aimed at mobilizing other youths from their community to work together to combat corruption. The evaluation also shows that these youths are passionate about sharing what they have learned about corruption and anti-corruption to friends, families, teachers, and co-workers.

Youths interviewed also reported that they have changed themselves by refusing to give bribes to local authorities and teachers. They have, moreover, changed others. One female youth in Kampong Cham said she has changed some of the corrupt practices in her community. For example, she managed to teach some of the villagers about corruption, and the need to stop paying extra money to the communal authority to obtain public services. The results, she said, were positive, with some citizens no longer engaged in this type of corruption. Youths in Battambang, meanwhile, have organized many activities to promote anti-corruption with other youths and citizens such as providing training to students studying at Build Bright University (BBU) and University of Management and Economics (UME). They also initiated public forums at commune halls and other campaigns to deliver anti-corruption messages to the public. Through these youths, a number of private universities and schools in Battambang decided to provide a discount to students who are holding TIC Anti-Corruption cards. These include UME, Dewy University and International University.

Through FGDs with radio listeners in Battambang and Kampong Cham, we learn that TI Cambodia's radio programmes, including Clean Road and The New Generation, are important messengers. Through the programmes, knowledge of the listeners on good governance, corruption and how to fight corruption has been significantly improved. Listeners said they became active in fighting corruption after listening to the programmes. They also shared this new knowledge with their neighbours, friends, and students and encouraged other villagers to listen to these programmes. Moreover, some radio listeners applied the various methods to fight corruption---as taught in these radio programmes---when faced with demand for under-the-table money. For example, one female listener in Battambang was able to identify corruption in her school through listening to the radio programme. As a result, she stopped paying money for her in-class's exam paper and informed her classmates not to pay as well. Another listener, who is a middle school teacher, in Battambang, also shared radio contents with his students as well as his villagers. He also helped other fighting corruption at commune hall when commune clerk demanded more money than the fee set by the government.

Through FGDs with factory workers, we are able to document several key impacts. Workers who attended training on integrity and transparency with TIC partner, CCAWDU, said they gained a great deal of knowledge on this topic. This knowledge changed the way they think and behave. Most participants, who are worker representatives or union leaders, said they have been sharing this new knowledge with their co-workers and other people on integrity and transparency, problem solving and negotiation skills. Some workers have already successfully applied this tool, for example, when negotiating with factory owners over the issues of pregnant workers' lay offs, and corruption in overtime payment.

Through FGDs with commune councillors and FGDs with citizens and youth in Kampot, Kampong Cham and Svay Rieng, we noticed that commune councillors are happy with TI partner NGOs' activities such as public forums, and trainings on good governance, integrity and transparency. A commune chief in Svay Rieng said her team's understanding about corruption has been significantly enhanced. She added that she is proud of TI Cambodia's projects, for teaching commune councillors and local citizens about good governance, integrity and transparency. She also said trust between commune councillors and citizens have greatly improved after both sides joined trainings and public forums organized by TI partner NGO, PDP.

Meanwhile, TI Cambodia's media partners CCJ, ThmeyThmey, CCIM and WMC said TI Cambodia's anti-corruption programmes have reached a significant number of people throughout the country and even overseas. Many listeners of CCIM and WMC also confirmed this during FGDs.

Impact of TI Cambodia's Governance Foundations and Capacity Building Programme: The programme has successfully delivered as planned, and produced significant positive impacts on the organization. TI Cambodia's strategic plan was well designed and is in line with the Millennium Development Goals and the goals of various key stakeholders, including the government and development partners. This strategic plan proved instrumental in guiding TI Cambodia's activities over the past three years.

Aside from the generous funding from our key international donors, TI Cambodia has been operating effectively, due in part to the establishment of a clear governance structure, the recruitment of capable staff and the development of a series of internal policies. These policies include Human Resources and Administration policy, Financial Management policy, Procurement policy, Grant Management policy, Child Protection policy, Security Risk Management policy, IT policy, and Office and Property use policy.

The fact that TI Cambodia was recognized by the Ministry of Interior and granted the status of official National Chapter by Transparency International Secretariat are also evidence of the impacts of the programme. Moreover, despite its relatively young age, TI Cambodia has cultivated a

reputation as one of the leading civil society organizations in the country in terms of efforts to fight corruption, clear democratic principles, work ethics, and networking. As a result, TI Cambodia has secured commitment from a number of key donors to implement its new strategic plan for 2016-2020. More importantly, TI Cambodia has built a wide range of networks across the country and sectors, including the government, business, civil society organization, citizens, and the media.

LESSONS LEARNED

While TI Cambodia has remarkably achieved outcomes and impacts from implementing its previous three-year strategy and has positioned itself to be an active and effective organisation leading the fight against corruption in Cambodia, a number of challenges were faced and some key lessons learned worth taken into account for future improvement. As stipulated in the Mid-Term Review Report conducted by an independent evaluator and the Organisational Capacity Assessment Tool (OCAT) of TI-S, below are some key lessons learned.

Engagement with the National Counterpart: One of the strengths of TI Cambodia is its ability to relate and engage very constructively with key relevant national institutions, particularly the Anti-Corruption Unit (ACU). Regardless of the sensitivity of its work, TI Cambodia was able to partner with the ACU, which saw the signing of the Memorandum of Understanding (MoU) and Cooperation Agreement to implement activities aimed at increasing citizens' participation in promoting integrity and fighting against corruption. However, the relationship deteriorated when TI Cambodia released a number of major studies and research, which were viewed as critical of the Government, such as the release of the annual Corruption Perceptions Index (CPI) and the Global Corruption Barometer (GCB). It was a very difficult balance to maintain by TI Cambodia. The collaboration of TI Cambodia with any institutions should not be a pre-condition and an exchange of its independence to express and operate its works to enhance transparency and promote an open government. TI Cambodia was viewed as taking sides with the opposition party because of its participation in observing the national election in 2013. This is a valuable lesson learned for TI Cambodia.

In the future, a wise choice of strategic priorities and approach should also be taken into account while ensuring that the core principles of TI Cambodia will be maintained including its commitment to tackle political corruption and the promotion transparency and integrity in elections and electoral process. Since the election reform is put under the framework of the Election Reform Alliance (ERA), TI Cambodia will not take the lead on the election reform and any studies/research related to the election should be conducted by ERA. By doing this, the attention will be diverted to ERA instead of TI Cambodia alone, and it should be this way given the fact that ERA represents a coalition of CSOs, which is advocating for transparency in the election process. As recommended in the Mid-Term Review report, TI Cambodia has also stepped up its efforts to build relationship through Memorandum of Understanding (MoU) with key government institutions such as the Ministry of Interior (MoI), the Ministry of Education Youth and Sports (MoEYS), the National Assembly and potentially the Ministry of Commerce (MoC). The diversification of partnership with multiple Governmental institutions will bolster our holistic and constructive approach to reform and make TI Cambodia less prone to being accused as having affiliation with any political parties. In addition, TI Cambodia is also engaging with reform-minded individuals who are seen as the reformers within the government institutions.

Working with the Civil Society: TI Cambodia has shown itself as a significant ally of other key anti-corruption actors within the civil society groups through its ability to find synergies amongst like-minded organisations and identify the entry points with significant leverage to promote its agenda for change. However, some key lessons learned are worth mentioning for any future partnership with local civil society organisations. First and foremost importance is a mistrust between the government bodies and CSOs, which has to be narrowed down. While CSOs, who are representing the voice of the people, have contributed significantly to the government's reform efforts and development, they are not fairly recognised by the state party. On the other hand, the lack of reform and progress, made by the government, only fuels public frustration and criticism which the government often view as provocative and unconstructive. A more constructive and meaningful dialogue must be fostered to enhance trust and improve the relationship between the two stakeholders. The second lesson

learned here is the limited technical capacity of CSOs to deliver results effectively and the lack of cohesion among its members. The third is its inability to ensure both institutional and financial sustainability. For future engagement with CSOs these core elements of truth should be taken into consideration and the responses to these concerns should be genuinely addressed. However, TI Cambodia should intensify its partnership with outstanding CSOs on the ground to raise awareness about corruption and empower citizens to stand up against it while maintaining its modest manpower.

The Advocacy and Legal Advice Centre (ALAC): ALAC's progress is lagging behind in terms of its limited ability to resolve corruption cases due to both internal and external factors. Although ALAC is a valuable alternative platform for people to access legal assistance on corruption grievances, its success lies entirely on the Anti-Corruption Unit's positive intervention. By law, only the ACU has the rights to investigate and send corruption cases to the court. ALAC has to refer cases to the ACU and rely on it to pursue the case further, which as a consequence undermines ALAC's ability to ensure success of the case. However, the success of ALAC is not determined solely by the resolution of cases. The purpose of ALAC is more than just the number of cases received or number of cases resolved. The data and information, which were collected from people, are the valuable information, and they can be used as concrete evidence for a more meaningful dialogue with relevant institutions for positive reform and advocacy purpose. The existence of ALAC serves as an alternative and complementary platform for victims and witnesses of corruption to access justice in a country where people almost lost trust completely on judiciary that is viewed as the most corrupt institution. ALAC has responded well to the implementation gap for the past two years. The number of cases has increased more than 40% and it has also broadened relationship with other key government institutions such as the National Assembly's Commission 10.

The Business Integrity Programme (BIP): BIP was not a well-thought-through programme of TI Cambodia from the beginning. BIP is also a new area of TI Movement and until recently, only few Chapters chose to integrate it into its strategy. TI Cambodia has vaguely crafted the BIP in the Partnership and Coalition Building Programme with a very limited budget and manpower at the onset. The idea started to change when TI Cambodia hosted the first regional BIP Conference in Phnom Penh and saw an opportunity to adopt the BIP from TI Malaysia, who was the most advanced Chapter on the BIP. Taking advantage of this international expertise from its sister Chapter, the Management Team of TI Cambodia decided to pilot the BIP in Cambodia while foreseeing the challenges ahead. With this limited resources, TI Cambodia was only able to afford a part-time consultant to lead the project with supports from a programme officer. Despite this challenge, TI Cambodia has introduced the BIP well to the business community. It started to talk with key chambers of commerce and business associations and sought for their views on the BIP and the approach in which these institutions would take to implement the Corporate Integrity System. Fortunately in 2013, a BIP Advisor who is paid by SIDA came on board and has been moving the BIP to the next level. The BIP team is now well funded with an adequate manpower to move the initiative forward. TI Cambodia is also building its internal expertise on the BIP and has adopted its approach to BIP based on the context of Cambodia. Unlike its Malaysia's Chapter, TI Cambodia at least for the time being is not looking to profiteer BIP as the business environment is not conducive enough for this. Instead, it is building a long-term partnership with all relevant partners including the ACU to promote an enabling environment of business and build capacity of businesses on the Corporate Integrity System.

Evidence of Attribution and Monitoring and Evaluation: MTR indicated a lack of factual data on key achievements, which TI Cambodia claimed it has contributed to. In response to this, TI Cambodia has developed a digital database which enables TI Cambodia's M&E Specialist to collect, store and analyse data more effectively. TI Cambodia also developed its internal M&E tools, which the team utilised to better capture the impacts of the activities it conducted. Both qualitative and quantitative tools were deployed to underpin both positive and negative impacts of the programmes such as survey, FGDs, spot-checks, report views and data verification, interviews and the Most Significant Change Story (MSC). TI Cambodia's management team also built capacity of the team to make sure that the indicators of the programmes are Specific Measurable Attainable Relevant Time-Bound (SMART). Having said this, we have acknowledged that capturing the qualitative impacts of

the programmes is not easy, especially the impact of perception and knowledge. TI Cambodia has built its internal capacity on M&E and for its new strategy, and we will be able to perform much better on collecting of evidence of attribution on the impacts of the programmes.

Internal Governance Foundation: Since its inception in 2012, TI Cambodia placed the internal governance foundation high in its core strategic goals. TI Cambodia's management team knew well that before we could teach others on transparency and accountability, we need to get our house in order first. KPMG was hired to assess TI Cambodia's governance foundation and outline necessary recommendations for improvements. With the support for SIDA, TI Cambodia's team responded very well to all recommendations put forward by KPMG. TI Cambodia is now well equipped with all necessary policies and regulations to ensure the integrity of the organisation, check and balance, transparency and accountability in its operations. Capacity of TI Cambodia's second tier management also expanded to ensure the long-term sustainability of TI Cambodia and limit dependency on a few leaders of the organisation. TI-S also recommended TI Cambodia to become a membership based organisation in the near future as a condition for its approval to accept TI Cambodia as a fully accredited National Chapter. From 2016, TI Cambodia will launch its membership policy and invite both individuals and corporations to apply for membership of TI Cambodia.

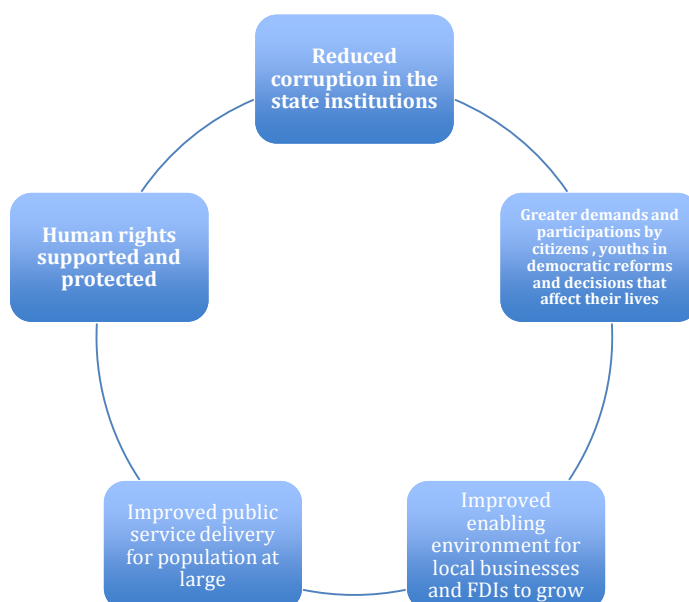
COLLECTIVE ACTION FOR TRANSPARENCY AND INTEGRITY: OUR STRATEGY 2016-2020

Building upon the impact generated by TI Cambodia during the implementation of its “Together against Corruption” strategy, we now seek to move beyond awareness raising and translate the current momentum into concrete action and tangible reform. This requires working on both the demand side, which entails empowering citizens, civil society and businesses to take action against corruption and the supply side, which entails building the capacity of government institutions and supporting them in their governance reform efforts.

OUR STRATEGIC GOALS FOR 2016-2020

THE THEORY OF CHANGE

In the long term, TI Cambodia’s ultimate goal is to enable a robust governance of a high integrity system, which can ensure the rule of law, sustainable development and a high quality of life for Cambodian people. This is a long and difficult journey ahead for TI Cambodia and the anti-corruption coalition to reach. To achieve this goal, Cambodia needs an urgent structural reform and a government that is capable and bold enough to drive changes without undermining core principles of democracy and human rights. This may take a generation or two but the right efforts and works need to take place continuously from now. Nonetheless, however pessimistic it is, there is still hope and that hope lies heavily on a new generation of young people. Although our long-term impacts are difficult to predict, we envision that our work will attribute to the following achievements:

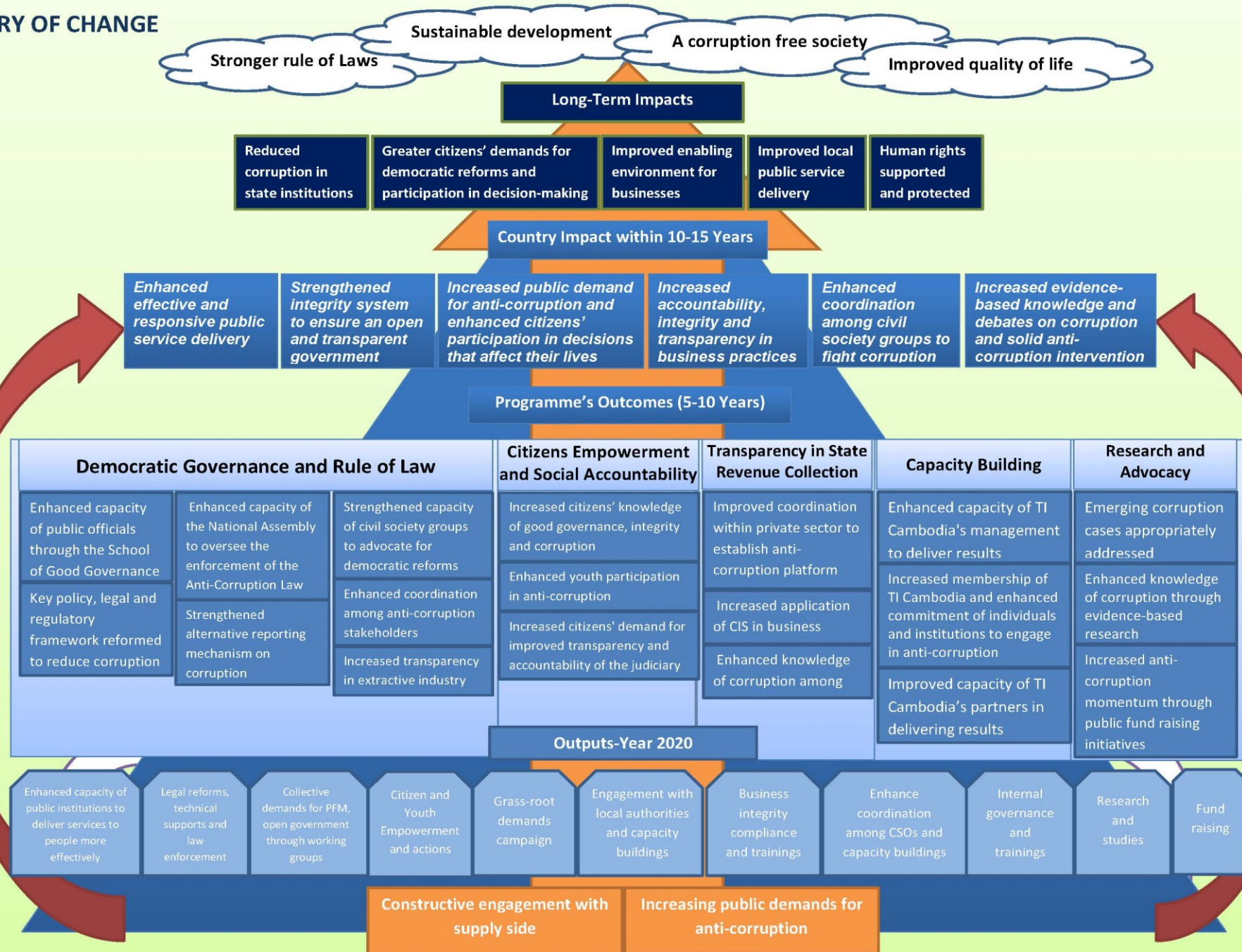


In the medium term, within 5 to 10 years, TI Cambodia is foreseeing the country-level impacts on anti-corruption and governance reform as follows:

- Strengthened democratic governance and enhanced effective public service delivery and capacity of public officials on social accountability, integrity and anti-corruption.
- Strengthened integrity system to effectively promote an open government, public sector transparency and better service delivery for the population.
- Increased public demand for anti-corruption and enhanced civic participation by all citizens in decisions that affect their lives.
- Increased accountability, integrity and transparency in business practices.
- Enhanced capacity of civil society and citizens/youth groups and increase their participation in the fight against corruption.

In the short term, TI Cambodia seeks to enhance the democratic governance and rule of law through some key legal and regulatory reforms and strengthen state institutional capacity to provide services to people more effectively at the national and sub-national levels. We also aim to enhance coordination and build robust public demands for transparency, accountability and anti-corruption through enhanced coalitions and empowered citizens. Tapping into government's reforms, we also aim to strengthen the state's capacity in its revenue collection through an improved enabling environment for business and business compliance. Through our research and studies, we can influence the state parties on reforms, which are structural and needed based on facts and credible evidences.

THEORY OF CHANGE



Goal 1: Support public institutions' capacity development and reforms in order to establish and strengthen integrity systems, promote good governance and fight corruption

On-paper commitments have been made by political leaders to tackle corruption and enhance transparency, as evidenced in the National Strategic Development Plan (NSDP) and the RGC's Rectangular Strategy (Phase III). However, political leaders have rarely translated these commitments into concrete action, partly due to a lack of technical skills at the implementation level.

Based on our evidence-backed research and findings, we will seek to provide technical support to relevant institutions in order to effect structural change. More specifically, we will:

- Open a National School of Governance to build capacity and disseminate knowledge to relevant public officials and individuals who have the capacity to implement the reform agenda. This project will be co-managed by TI Cambodia and the Ministry of Interior (Mol) for the first three years. TI Cambodia will then consider handing over responsibility to the Mol after effective measures have been taken to ensure the sustainability of the project.
- Provide technical expertise to support on-going reform efforts within relevant ministries, notably the Ministry of Education, the Ministry of Interior, the Ministry of Economy and Finance (implementation of procurement oversight), the Ministry of Commerce (creating an enabling and clean environment for businesses and attract investment) and the Ministry of Environment.
- Support the capacity of Parliament Commissions #10 (both at the National Assembly and the Senate).

Expected programme's impact: *Strengthened democratic governance and enhanced effective public service delivery and capacity of public officials on social accountability, integrity and anti-corruption.*

Expected programme's outcomes:

Outcome 1: *Enhanced capacity of public officials on good governance, social accountability, integrity and anti-corruption to effectively provide public services to people through the School of Good Governance.*

Building on a partnership with the Ministry of Interior (Mol), TI Cambodia will continue to support the Mol by establishing the “**School of Good Governance**”, enhance the capacity and expertise of their trainers and equip them with tools to enable them to further train public officials at the national and sub-national levels on good governance, social accountability, integrity and anti-corruption. The “School of Good Governance” will serve as complement to existing educational institutions like the Royal School of Administration (RSA). While RSA provides academic education on broad and theoretical public administration topics the “School of Good Governance” will only educate practitioners with an explicit aim to enhance their capacity in effective and transparent service delivery in a more focused and practical approach in the form of finding solutions and case studies. TI Cambodia will provide experts to help the Mol develop the Business Plan for the School of Governance, a training manual and design the roll-out plan for execution. 10 series of Training of Trainers (ToT), which will last for at least three months per series will be conducted for a total number of 150 government officials (trainers) from the nationals and sub-national levels. The trainers at their local office will conduct follow-up training to further train their public officials as part of the Government's long-term capacity development plan for their officials at the provincial level. In

order to deliver this efficiently, Mol's provincial training centres that are already functioning will be used to roll out the training at the sub-national level.

TI Cambodia will source internally and externally for people to train the Mol's trainers on both technical skills and teaching methodology. Anti-corruption experts will be called in and contracted to provide professional training to trainers from the Mol. Experts from the Anti-Corruption Resource Centre (4U) and the Anti-Corruption Academy in Malaysia will be invited to advise on the development of the training manual and provide the training. TI Cambodia will also bring in existing international expertise from TI Chapters in the region such as TI-Bangladesh, TI Papua New Guinea and TI-S Asia Pacific Department to ensure the best quality training and curriculum for the school. Local experts will also be invited to provide training on relevant topics and advise on the Business Plan and direction of the School of Governance. In conclusion, the expert group will consist of experts from all relevant institutions including regional/global experts. In order to make the "School of Governance" effective, sustainable synergies between government institutions, education institutions and civil society organisations needs to be established.

With adequate support from TI Cambodia to build the foundation of the School of Governance, it is expected that the Mol will take over the whole leadership and management of the school. In this regard, ownership is very crucial and it has to be embedded well from the beginning of the engagement with the Mol. TI Cambodia will phase out in year 5, although we will continue to provide technical support to the Mol as needed.

Outcome 2: *Policy, legal and regulatory framework of some key ministries reformed to reduce corruption, ensure sustainable development and enhance better access to public services.*

In partnership with key government institutions and CSO technical working groups, TI Cambodia will **enhance its constructive dialogue with existing partners to adopt and amend core legislation.**

- ***Amend the Law on the Organization of the Courts, the Law on the Status of Judges and Prosecutors and the Law on the Organization and Functioning of the Supreme Council of the Magistracy to guarantee the independence of the judiciary and increase access to fair trial and justice.***

Together with relevant government institutions, OHCHR, CCHR and other CSOs, we will constructively engage with the government to push for amendment of the above three laws to improve the independence of the judiciary and increase access to justice. A study on corruption in court procedures will be conducted to examine corruption along the value chain within court processes. The study will be used to lobby the government for reform and stimulate more informed debates about judicial corruption, which will lead to increasing social demand for fair trial and improved access to justice for the population, particularly the most vulnerable and marginalised groups. Legal experts will review the three laws to assess their strengths and weaknesses and propose the amended articles/clauses that ensure the independence of the court. We will conduct a series of consultations with the public and relevant stakeholders on the contents of the laws to collect their input. We will lobby for the amendments of the laws from different fronts. TI Cambodia will also engage constructively with the Ministry of Justice, wherever the space is available. Through the National Assembly's relevant commissions, we will consult with them on the draft-amended laws and lobby them to pressure the executive body to consider amending the laws. With the coalition of CSOs, we will collectively advocate for these laws to be amended. A nation-wide public campaign will be conducted to raise public awareness and increase demand among citizens and youths for no-impunity and judicial independence.

Together with OHCHR, we also plan to conduct an Empirical Study on Corruption in the Court System in Cambodia. The study's aims are to:

- identify the laws, rules, procedures and practices within the judicial system and process that are most subject to corruption,
- enhance understanding as to why these corrupt practices are taking place within the Cambodian judiciary, and
- contribute to improving the functioning of the justice system and to the eventual restoration of public confidence in it.

The main target group of the study will be judges, prosecutors and clerks at all levels of the court system, as well as “users” of the justice system: individuals that are party to legal cases and their lawyers. The incidences of corruption to be reviewed will include those related to both civil as well as criminal cases. However, this study will only be conducted if an additional fund is available, as it will be not budgeted under the framework of collaboration with SIDA and EU. TI Cambodia and OHCHR will mobilise funding support from various donors.

TI Chapters in South America and Africa have conducted similar studies on judicial corruption and TI Cambodia will take advantage of the expertise, best practices and tools among the TI Movement to ensure that the study is up to an international standard. The study on judicial corruption conducted by UNODC in collaboration with the Nigerian government is also useful for this study.

On the demand side, we will mobilise public supports in our campaign on “No Impunity Campaign” and advocate for the independent of the judiciary. This activity will be conducted in synergy with Goal 3-Citizens and Youth Empowerment and CSO partners at the grass-root level in order to get people’s voices heard.

- ***Pass the Law on Access to Information***

TI Cambodia has been playing a significant role in the Access to Information “A2I” Working Group, a CSO coalition advocating for the adoption of a Law on Access to Information. We will continue to provide added value to this working group to demand better access to information in the Kingdom. With a newly formed joint government-led A2I working group, we will work collectively with the CSO A2I working group to ensure that proper consultations will take place to consult with relevant stakeholders and that the law on access to information meets international standards.

- ***Amend the Anti-Corruption Law***

Based on the findings and results of UNCAC’s review and the recommendations stipulated in the National Integrity System Assessment (NISA) 2014, a few articles and clauses in the Anti-Corruption Law will need to be reviewed and amended in order to guarantee the Anti-Corruption Commission’s independence and enable effective law enforcement. For example, in Article 20, a clause should be added to ensure that asset declarations are shared with the public. The phrase stating that asset declarations are highly confidential should also be removed. In Article 41, the provision that seeks a prison sentence for anyone making a corruption complaint should also be removed. Article 11 which covers appointment the ACU leadership should also be considered to ensure the independence and constitutional protection of the ACU. A legal expert will be hired to review the law and proposed the articles and clauses that need to be amended to ACU, NA and other relevant stakeholders.

To achieve this, TI Cambodia will seek to enter into a constructive dialogue with relevant government institutions and National Assembly commissions to push for the law to be reviewed and possibly amended. Through UNCAC’s Coalition and the UNCAC’s review committee, TI Cambodia

will continue to press for the amendment of these key articles and increase the government's commitment to comply with UNCAC's requirements. We will also channel the lobbying to the newly re-established Development Partners Working Group on Anti-Corruption to persuade them to raise these issues with the government through their diplomatic channels.

Together with a coalition of CSOs at the national and sub-national levels, we will continue to not only advocate for the amendment of the law but also lobby the government to work towards its effective enforcement. Through TI Cambodia's five Provincial Youth Clubs, Community Teacher Associations, Parent Associations and network of over 15,000 youths across the country, we will mobilise citizens and youth countrywide to demand for this law to be amended. Online petitions and campaigns will also be conducted to increase public engagement for anti-corruption reform.

- ***Pass the Whistleblower Protection Legislation***

Both the UNCAC review and NIS report recommended that the Whistleblower Protection Legislation be passed in order to increase citizens' participation in reporting and giving witness evidence on corruption-related cases. TI Cambodia will work very closely with the National Assembly's Commission 10 and the inter-ministerial working group, which comprises of the Anti-Corruption Unit, the Ministries of Interior and Justice, to draft and adopt this law. A legal expert will be appointed to sit with the legal team of ACU to engage with the government and advise on the draft law. A policy paper on Whistle Blower Protection Legislation will be developed by an expert and introduce to NA, ACU and stakeholders to inform them about the importance of the law and provide them with legal standards and best practices from other countries.

TI Cambodia will form a working group to demand for the law to be developed and eventually passed. Legal experts will be hired to develop the draft law, conduct consultation with relevant stakeholders and the public. The draft will be introduced and presented to relevant government institutions for consideration. Through similar activities to those described above, we will lobby and advocate for the law to be developed and passed by the government.

Outcome 3: Enhanced capacity of the National Assembly's Commission 10 to effectively oversee the enforcement of the Anti-Corruption Law and support victims and witnesses of corruption in investigation and complaint handling.

TI Cambodia will work very closely with the National Assembly's Commission 10 to enhance their capacity and technical expertise to oversee the enforcement of the law more effectively. We will help the Commission to conduct a Capacity Need Assessment and develop a capacity building plan for them. The anti-corruption oversight role guideline will be developed by experts to orient to all staff of the Commission. Tailored training on key technical skills such as investigation techniques, anti-corruption monitoring and evaluation as well as anti-corruption strategies will also be provided to the Commission. Based on the Capacity Need Assessment, TI Cambodia will bring in both local and international experts to provide training and workshops for the staff of the commission.

We will help the Commission to establish a complaint mechanism with proper policy, implementation guidelines and human resources to provide legal advice to victims and witnesses of corruption. The Advocacy and Legal Advice Centre (ALAC) will collaborate closely with the Commission on legal aspects and complaint handling. Our local legal team will be readily available to provide all necessary support to the commission on complaint handling and advising on legal and regulatory frameworks. We will also seek for technical support to TI-S's ALAC and legal team on this component, especially the reporting mechanism, confidentiality and data storage.

On the demand side, we will work with the Commission to organise a bi-annual National Forum on Anti-Corruption and conduct three joint studies on corruption-related issues. The forum will be held at national and sub-national levels. On 9th December each year, we will work with the Commission and relevant government stakeholders, CSOs and the public to organise nationwide campaigns on anti-corruption to raise public awareness on the causes and effects of corruption on their lives and society. The campaigns will be conducted both in Phnom Penh and in at least five regional provinces, where TI Cambodia's networks will be present.

Outcome 4: *Strengthened effectiveness of alternative reporting mechanisms on corruption cases through the Advocacy and Legal Advice Centre (ALAC) and enhanced social demand for anti-corruption by citizens and youths.*

With continuous support from TI-S, TI Cambodia's ALAC is now fully operational. Our legal team is fully equipped with all necessary expertise on ALAC's mechanism and skill to ensure that witnesses and victims of corruption will get all supports needed to pursue their cases further to ACU and NA.

The Advocacy and Legal Advice Centre (ALAC) will intensify its national and grassroots campaigns to create stronger social demand for improved anti-corruption law enforcement and encourage citizens and youth to report corruption. Through TI Cambodia's five Provincial Youth Clubs, Community Teacher Associations, Parents Associations and network of over 15,000 youths across the country, we will run ALAC campaigns with CSO partners, youth, monks and organise citizens forum to allow them raise their grievances and seek legal support from ALAC.

In partnership with CSOs at the national and sub-national levels, we will cooperate with them on handling grievances. CSOs will be able to refer corruption-related cases to ALAC and vice versa. A total of 50 complaint boxes will be placed at partners' offices, following the training on ALAC mechanisms and anti-corruption laws. Representatives from at least 50 CSO partners will be selected to attend this training and they are expected to further train their peers and partners about ALAC at their constituencies.

Goal 2: Strengthen coalition between and among civil society organisations to fight corruption and promote integrity.

Building upon the coalitions and partnerships we successfully forged with civil society organisations, we will continue to engage in advocacy efforts in sectors regarded as crucial to strengthen Cambodia's integrity system, including but not limited to:

- Electoral reform
- Access to information
- Open government
- Budget transparency
- Judicial reform
- The Extractive Industries Transparency Initiative (EITI)
- Forestry governance and integrity

We will seek to strengthen the capacity of civil society and various NGO groups in order for them to be able to push for reform more effectively. TI Cambodia will seek to synergise with other key actors in sectorial reforms and increase even more momentum for changes, while avoiding duplications and re-inventing the wheel.

Expected Programme's Impact: *Strengthened integrity system to effectively ensure an open government, public sector transparency and better service delivery for the population.*

Expected Programme's Outcomes:

Outcome 1: *Strengthen the capacity of civil society and various NGO working groups in order for them to advocate for democratic reforms more effectively.*

Through CSO coalitions and working groups, TI Cambodia will add value and build an even stronger coalition to demand for genuine political commitment in democratic reform. The coordination of a coalition of at least 70 key CSOs, including umbrella CSOs, at the national and local levels will be strengthened to address issues that hamper democratic reform. We will continue our close collaboration with the **Electoral Reform Alliance** (ERA) to monitor the performance of the newly formed National Election Committee (NEC) and continue to critically demand for its neutrality. Although the amended Election Law is inadequate to ensure the independence of the NEC and guarantee free and fair elections, we will monitor its implementation. Within the mandate of ERA, we will observe and monitor the voter registration process and urge for the new NEC to ensure that it is done in a transparent and open manner. We will jointly audit the new voters list to assess whether it is good enough to be used in the upcoming national election in 2018. More importantly, if additional funding is available, we will conduct a Sample Based Observation of the national elections and release the findings and recommendations to the public. The study will be led by a technical team under the framework of ERA to ensure a cohesive and collective approach and advocacy.

The National Democratic Institute (NDI) will be the main donor for our work on election reform. The funding for SBO and other components will be expected from the NDI. Under the framework of ERA, three key NGOs including TI Cambodia, NICFEC and COMFREL will discuss with the NDI on a joint collaborative framework and funding, particularly for the up-coming commune election in 2017 and the national election in 2018.

Public Financial Management (PFM) is a key to anti-corruption reform in Cambodia. TI Cambodia has prioritised PFM in its current strategy as well as its next five-year strategy. We will seek for close collaboration with the General Department of Taxation (GDT), the National Audit Authority (NAA), the National Institute of Statistics (NIS) and the Policy Institute of Cambodia (PIC). TI Cambodia, which is a core member of the CSO Working Group on Budget Transparency, will play a complementary and coordinating role in PFM reform process. The followings are key components that TI Cambodia seeks to work on:

Capacity Building: together with experts, we will enhance capacity of CSO partners on PFM and budget transparency. An expert on PFM will be hired to provide strategic directions and guidance to CSO Working Group on public financial management reform and coordinate with national institutions. TI Cambodia will also make use of expertise from TI Movement and adopt it to Cambodian context. It is very crucial to ensure that the Working Group stays relevant and is able to provide meaningful contributions to the government stakeholders on PFM.

Conducting Open Budget Survey (OPS): together with the Working Group on Budget Transparency, we plan to conduct the Open Budget Survey (OBS). Constructive engagement with the government will be sought on the study. The findings and recommendations will be presented to all relevant stakeholders; especially the government and we will seek for collaborations with them for reform.

Engagement with the Government Partners: We will actively engage with the Ministry of Economy and Finance (MEF) and national institutions in the annual budget preparation and encourage the government to consult with stakeholders and, if possible, the public in the process of budget preparation. Furthermore, collaboration with the MEF and the NAA will be sought on

improved quality, coverage, public availability of relevant budget information and documents. We will also explore an opportunity to work with MEF on procurement and budgeting.

Empowerment of Citizens: last but not least, TI Cambodia and its partners will continue to raise awareness among the public on budget transparency and PFM and empower them to take actions aiming to raise demand for transparency in the preparation of national budget, better access to information on national budget and an improved Public Financial Management.

Together with the **Working Group on Budget Transparency**, we will constructively engage with and urge the government to promote transparency in national budget management and to disclose information on the national budget. Capacity of CSOs will also be built on budget transparency to enable them to engage more meaningfully in the consultation process.

We will mobilise public demand for the government to pass the **Law on Access to Information** that meets international standards. A number of joint advocacy public campaigns and events will take place to raise public awareness about the importance of access to information in order to strengthen transparency and reduce corruption.

Outcome 2: *Enhanced coordination among anti-corruption stakeholders for transparency, accountability and open government.*

Efforts to demand for an open and transparent government are not new for both CSOs and government in Cambodia. There has been progress over the years concerning the government's compliance with the principles of **Open Government Partnership (OGP)**, an international platform created in 2011 for domestic reformers committed to making their governments more open, accountable, and responsive to citizens. Nevertheless, more actions need to be taken to fully achieve this. Building on the OGP Conference in Bali in 2014, TI Cambodia, CCC and few other CSOs have come together to discuss how OGP principles will be introduced to the Cambodian government. In 2014 and early 2015, we brought together key government institutions, CSOs and relevant partners to discuss the prospects of OGP in Cambodia, where the government expressed its commitment to becoming more open. In the next five years, we will work with all relevant stakeholders to support the government in becoming a member of the OGP and work towards adopting the eligibility criteria, which comprise fiscal transparency, access to information, asset disclosure and citizen engagement. A CSO OGP Working Group will be formed with a proper coordinating body to ensure multi-stakeholder participation. We will constructively engage with government institutions to raise their understanding on the importance of OGP and help them establish a government-led OGP working group, which will set the foundation for the adoption of the OGP.

Outcome 3: *Strengthened transparency and accountability in land concessions, extractive industry and mining*

Although increasing transparency within extractive industries is a very challenging area of work, we believe that trying to improve the overall integrity and transparency of this sector will eventually increase the government's revenue through tax and fee collection. Together with relevant partners, we will work with the existing **Extractive Industry Transparency Initiative (EITI) working group** to advocate for transparency in this sector. At the national level, we will bridge the EITI Secretariat with the Cambodian government. We will connect the G7 Mongolia-German Fast Track Partnership to establish a peer-learning platform with the Cambodian government. A workshop will be organised in partnership with the Government, CSOs and the private sector to ensure commitment, enhance capacity and enrich the local EITI. The workshop will aim to enable participants to follow-up and eventually solve the previously identified pressing issues impeding the EITI's implementation.

At the local level, we will work with CSOs to raise public awareness of transparency and integrity and increase demand by citizens and youth for the government to adopt and implement EITI compliance. To achieve this, a series of citizens' forums, trainings/workshops and youth campaigns will be organised. Online campaigns will be run across the country to demand for transparency in the sector. A paper documenting best practices and lessons learnt from countries that have adopted and implemented EITI will be produced and shared with relevant stakeholders, particularly government institutions.

Goal 3: Empower people to fight corruption and promote integrity individually and collectively

Building upon on our existing youth network and past citizen engagement activities, we will now seek to:

- Empower citizens, especially youth, to take concrete actions at the community and grassroots level, organising them into community-based groups with proper structures and building their capacity on various social accountability tools/initiatives so that they can further engage their peers to take concrete action individually and collectively. Those activities may include citizen monitoring of community development projects, infrastructure construction, forestry management, public service delivery, teachers' performance, auditing expenditures at the commune-level etc.

Expected Programme's Impact: *Increased public demand for anti-corruption and enhanced civic participation by all citizens in decisions that affect their lives.*

Expected Programme's Outcomes:

Outcome 1: *Increased citizens'/youth's understanding and knowledge of good governance, integrity and corruption and its effects on their lives and society*

TI Cambodia has been very successful in mobilising citizens and youth to demand for social accountability, transparency, integrity and anti-corruption. For the past three years, a network of more than 15,000 young people has been created to demand for democratic reform. Among these youths, at least 5000 are actively engaging with TI Cambodia and are creating impact within their community and schools. In the next five years, we will **intensify our public awareness-raising campaigns** to promote integrity, transparency and the fight against corruption.

We will organise an annual **"Clean Youths Campaign"** at both national and sub-national levels to educate, train and equip youths with knowledge, skills and social accountability tools. Five more batches of around 150 youths will be selected to attend a three-month intensive "young professional leadership training", where they will learn a wide array of skills such as leadership, communication, anti-corruption best practices, anti-corruption law, UNCAC, basic project management and other soft skills. These youths will be divided into small groups and provided with the opportunity to initiate and implement their own youth-led projects to further promote integrity and transparency in their communities and inspire others to join the anti-corruption youth network and eventually take action against corruption.

Through these youth-led initiatives, we will reach out to hundreds more youths, create more impact and greater demand for anti-corruption. We will also train a new generation of young anti-corruption professionals by providing anti-corruption apprenticeships to 4 generations of 5 young anti-corruption activists to study at the Anti-Corruption Academy in Malaysia. Upon their return, we will find internship places for them to work at other chapters in the region, so that they will get hands-on

experiences with the work of Transparency International's National Chapters. They will then return to work with TI Cambodia as Young Professional Officers/interns/volunteers.

The **youth camp on “Youth Empowerment for Integrity and Transparency (YETI)”** has been one of our most effective activities, where youths were educated and empowered to take action against corruption. For the next 5 years, 5 more YETIs will be organised and we are expecting to directly train at least 500 young leaders and engage hundreds more youths across the countries through youth-led initiatives. These trained youths will be expected to initiate and implement projects to monitor public service delivery in their respective communities. They will be invited to join TI Cambodia's provincial youth clubs and continue to actively engage with TI Cambodia.

TI Cambodia and seven other TI Chapters of Vietnam, Malaysia, Indonesia, Pakistan, the Philippines, Bangladesh and Papua New Guinea (PNG) have successfully formed an anti-corruption youth network in Asia called **“Youth Movement for Transparency in Asia-Pacific (YMTA)”** as a result of the first International Youth Camp on “Youth Empowerment for Transparency and Integrity” held in Siem Reap in January 2015. YMTA is now implementing a number of youth-led initiatives in their home countries to reach out to more youths and empower them to join forces against corruption. A joint project on “Arts against Corruption” is also implemented in seven chapters to call for youths to use their creativity against corruption. An online campaign will be run to call on governments in the region to take concrete measures against corruption. In the next five years, YMTA will play an important role in jointly advocating for a transparent ASEAN community, where youths will be at the forefront of the campaign. YMTA will be well integrated into a new initiative called the “ASEAN Integrity Community” led by the Transparency International Secretariat and various TI Chapters in the region. YMTA will invite other countries to join and expand its membership to other regions as well. We will also join the Anti-Corruption International, a network of youths against corruption based in Europe and Asia Pacific. We will help to build a strong coalition of youths against corruption and work with governments of each country to prioritise anti-corruption in their reform agenda and take concrete measure individually and collectively against corruption.

TI Cambodia will partner with relevant CSOs at the national and sub-national levels to implement projects that promote integrity, transparency, and accountability to fight corruption. TI Cambodia will provide five grants per year to partners such as the media, including online media agencies and grassroots CSOs to implement social accountability projects and engage citizens/youths in demanding transparency and accountability from their local authorities. We will also work with some outstanding youth organisations in the field to implement a number of community monitoring projects such as the delivery of the Citizen Monitoring Project on Health, Education and Commune Council Services.

With an ever-growing number of people using the Internet and social media platforms, we will also seek to use innovative means to reach out to the people. We will create an online **“Transparency TV”** and produce our own contents for this online channel and broadcast our programmes/impact and stories on a regular basis. We will produce an **online training platform**, where people can learn about good governance and anti-corruption online. We will also partner with the media to air our **own radio programme** via the radio partner's airwaves. A radio production team will be in place to produce tailored radio programmes that aim to spread the impact of our programmes to the wider public, particularly those who are living in rural areas. We will engage with young artists and those who love the arts to take part in our campaign against corruption. We will use cartoons and theatre to educate and inspire youths to be more involved in social causes. Through social media tools such as YouTube, Facebook, Twitter, TI Cambodia's blog “Sojarit” and SMS text messages, we will get our message across and engage with the public more effectively. We will partner with ICT experts to create an app called the **“Official Public Fees App”**, which stores all data and information about official public fees. People can download the application on their computer or smartphone and use it

when they need to acquire public services. We will also continue to promote the **Bribespot website and mobile app** and conduct more training/promos on the use of the application to report corruption in Cambodia.

We will sign an **MoU with the Ministry of Education Youth and Sports (MoEYS)** and jointly implement a number of youth empowerment projects, which will be led by the Ministry. The MoEYS will also partner with us to promote and empower the Youth Clubs in provinces. Apart from their own projects, we will also engage with the MoEYS in almost all youth engagement and empowerment activities at the national and sub-national levels such as YETI, Youth Forums, public campaigns and National Anti-Corruption Day. Together with the Department of Curriculum Development, we will provide technical supports to MoEYS to develop curriculum on Civic Education and Anti-Corruption for all grades, except the curriculum for grades 10, 11 and 12, which were already developed by ACU and MoEYS. An educational curriculum development expert will be hired to work with the department and train capacity of the existing Curriculum Development Committee of MoEYS. TI Cambodia's expert will also oversee and advice on the training of trainers as well as the pilot exercise of the curriculum in schools. An expert from TI PNG, who has provided an introductory training to lectures and teachers on civic education in 2015, will be brought on board to provide technical supports to MoEYS.

Outcome 2: Enhanced participation by youth on anti-corruption and increased demand for positive reforms.

As mentioned above, for the past three years we have successfully engaged over 15,000 youths directly through our programmes and activities. Among those, at least 5000 are very active with TI Cambodia. For the next five years, we will increase our youth-led initiatives at the national and grassroots levels. We will establish **regional local teams in five provinces**. To take advantage of the existing platform and avoid re-inventing the wheel, we will discuss with key youth organisations such as KYA, YRDP, YCC, CISA, SSCP and KYSD on strategic directions and approach to build youth network at the sub-national level in Cambodia. In each province, we will form a **Citizen Committee (CC)**, which will be comprised of high profile people and youth from their respective communities. The CC will act as an Advisory Board for the local office (which is described in detail in Goal 5), providing advice and direction to the youth clubs, farmer groups, teacher groups and parent groups on the development and implementation of local citizen-led initiatives, with a view to increase their participation in decision-making that affects their lives. Learning from best practices of citizen engagement from TI Bangladesh, TI Cambodia adopts similar approach to reach out to citizens and youth to empower them to demand accountability from their leaders. The five local regional provinces will be carefully selected based on geographic dimension. We will form a team of youths in each province that will play key roles as coordinators and work with youths in other neighbouring provinces. With the existing CSO partners who have rich local knowledge and expertise, we will tap into their projects and maximise the impacts through enhanced coordination and capacity building and anti-corruption and accountability tools. On top of local social accountability tools, which are available in the country, we will also introduce the Anti-Corruption Tool Kit, which was collated by TI-S from TI Chapters from around the world. Experts and practitioners from the region will be invited to share best practices and knowledge on Youth Empowerment Initiatives to our youth network and CSOs.

Together with local citizens, we will develop and implement “**Citizen Monitoring Initiatives**” on public service delivery, infrastructure construction, teachers' performance and/or forestry/environment governance at the commune level. Through partners, we will conduct training for citizens and commune councils on their role in fighting against corruption and how to monitor corruption practices in these areas. We will also mobilise religious leaders (Christians, Muslims and Buddhists) to teach citizens and youths about ethics, morality and integrity. An annual reflection

workshop will be organised to share the lessons learned, successes and challenges among all partners and youth groups to ensure that learning has occurred across the programmes and projects.

TI Cambodia and its partners will continue to promote the **Anti-Corruption Card and Declaration against Corruption** to youths/citizens/institutions through its existing activities and programs. More initiatives at the grassroots level will be implemented to reach out to more citizens and youths to sign up to this card and sign TI Cambodia's Declaration against Corruption. We will also engage the private sector and increase commitment from local business to promote integrity by signing up for the program, carry cards, and provide discounts on their products and services to people who hold the anti-corruption cards.

Through this youth engagement programme, we expect to educate, empower and engage more than 20,000 citizens and youth from across the country. This new generation of young people will be playing fundamental roles in the process of democratic reform in the future.

Outcome 3: *Increased citizens' demand for improved transparency and accountability of judicial sector in order to improve access to justice.*

The Judicial sector is perceived to be the most corrupt institution in Cambodia, according to Transparency International's Global Corruption Barometer (GCB), NISA and Youth Integrity Survey. As a result, injustices are common and impunity thrives in Cambodia. TI Cambodia will continue to **advocate for judicial reform** and demand an end to the culture of impunity. As efforts to engage in meaningful dialogue with the government have proven difficult, a demand-side approach will be used to put social pressure on the government to improve access to justice and fair trials in Cambodia. To achieve this, we will implement a **"Court Monitoring Project"** and conduct a study on impunity cases in Cambodia. The findings will be presented to relevant stakeholders and public at a series of public forums. We will also organise public campaigns toward ending impunity and establishing an independent judiciary.

Goal 4: Build coalition among and capacity of the private sector to promote integrity in business

Building on existing engagement with various chambers of commerce, SMEs and other businesses, the Business Integrity Programme will seek to engage more and more stakeholders to forge an "Integrity Alliance", provide training on corporate integrity systems and support private companies to ensure they implement them properly and effectively. Regional examples from Malaysia can showcase the potential of improving business practices. Perbadanan Kemajuan Negeri Selangor (PKNS) indicated it managed to save approximately 125 million USD over four years by improving its tendering procedure and implementing integrity pacts¹. Another important aspect is that the level of Foreign Direct Investment (FDI) to Cambodia from EU and U.S remains low compared to the rest of the region, primarily due to compliance issues/corruption risk. FDI to Cambodia from the EU makes up for less than 5% of the total FDI, compared to the rest of ASEAN countries where FDI from the EU also makes for 20-25% of the total FDI². Based on these facts there is strong economic rationale for companies to engage with the Business Integrity Programme (BIP).

This initiative is in line with the ACU's projects to promote clean business by encouraging private companies to sign a Memorandum of Understanding (MoU) with them in order to ensure the

¹ http://www.ssm.com.my/sites/default/files/basic_pages/TI%20BIP%20Malaysia%20SSM%2024-06-14.pdf

² ASEAN Secretariat and UNCTAD, 2015

companies' compliance and commitment to integrity and to protect them from being forced to pay bribes or kickbacks. The BIP also seeks to sign an MoU with the ACU in order to be able serve as intermediary between private companies and influence the "MoU Club" to become a more sustainable and efficient platform for business integrity.

This project will also support the reforms being undertaken by the Ministry of Commerce, one of the public institutions that TI Cambodia seeks to engage within the next five years.

Expected Programme's Impact: *Increased accountability, integrity and transparency in business practices.*

Expected Programme Outcomes:

Outcome 1: *Improved coordination amongst the private sector to establish platform for business integrity and anti-corruption.*

Drawing from successful examples in the region like Malaysia, Thailand and Vietnam, TI Cambodia has identified a need to formalise and streamline anti-corruption efforts in the private sector into collective action. **TI Cambodia seeks to establish a platform or integrity alliance to bring together key stakeholders from civil society, government and the private sector.** This platform will be led by the private sector through a steering committee ensuring both ownership and sustainability of the initiative. As mentioned previously, there has been a general positive development in the Cambodian private sector driven by active government agencies like the Ministry of Commerce, Ministry of Economics and Finance and the Anti-Corruption Unit. It is both possible and beneficial for companies to be compliant, which was not the case five years ago. This has opened up a space for TI Cambodia to work more closely with the private sector as both seek and are pushed to become more compliant and conduct business with greater integrity. Once compliance has become imperative for all companies, the ones who have been proactive and compliant will benefit from the changed business environment.

The platform will serve as a meeting point for key stakeholders, where it is possible to develop new initiatives, promote/request for reforms and knowledge sharing. Knowledge sharing has been highlighted as a key component by other chapters where multinational companies often seek to share knowledge with local companies in order to facilitate their future operations in the country. The platform will be led by the private sector as TI Cambodia sees its future role as technical advisor to the initiative. **The initiative will serve as a platform of integrity for clean companies, a guarantee for investors and a driving force for improved business standards in Cambodia.**

The platform's steering committee will meet on a regular basis, and a bi-annual conference on collective action will be held in order to develop new initiatives and promote its progress and impact.

The Ministry of Commerce has identified that human interaction between public officials and companies in closed spaces like offices often enables corruption. Hence, it is seeking to establish a variety of **online tools** that will minimize the human interaction between public officials and companies. TI Cambodia supports their analysis and is looking to support the development of an e-government partnership together with the Ministry of Commerce. The initiative will minimise opportunities for malpractice and improve **the ease of doing business in Cambodia**, which in the long term will make Cambodia more attractive for foreign direct investment.

Outcome 2: *Increased participation by private sector in applying CIS in their company.*

TI Malaysia has seen great success in implementing **corporate integrity systems (CIS)** for companies who want to improve their business integrity both internally and externally. CIS addresses key areas where companies are at risk of being victims of corruption both internally—through procurement and recruitment—and externally—by establishing clear procedures on anti-bribery, gift giving and hospitality and facilitation payments.

TI Cambodia will adopt a similar approach to TI Malaysia but will tailor the system to the Cambodian context and also gradually transition the service from being free of charge to a professional consultancy service. TI Cambodia has piloted the CIS with one garment company (Pactics). The outcome was in general positive but also provided TI Cambodia with useful lessons that can be applied moving forward while further developing the service. TI Cambodia will conduct case studies on the pilot companies that have implemented CIS in order to build a strong business case and increase the demand for the service.

A key lesson learned is that in order for CIS implementation to be successful, the company's management team must make it a priority to ensure that staff on all levels understand the policies and purpose of CIS. TI Cambodia, therefore, has to be selective with its clients and ensure that they are truly committed to the implementation. If TI Cambodia manages to further develop CIS in collaboration with an advisory group for the private sector, it can serve as a sustainable source of revenue for TI Cambodia after 2020.

Outcome 3: *Enhanced knowledge and understanding of corruption among the business community.*

TI Cambodia has just conducted research on the perception of SMEs on corruption. The findings clearly show that there is lack of understanding among SMEs about corruption. In general “tea money” to public officials is considered an acceptable way of doing business and not as corruption. This finding clearly indicates a need to work closely with the Cambodian business community, especially with SMEs and young entrepreneurs, to increase awareness of corruption issues and also to improve their capacity to refrain from engaging in corrupt practices. SMEs lack the compliance systems and economic leverage that multinational companies have. Therefore, it is of the utmost importance that TI Cambodia educates and organises SMEs into structures that would decrease susceptibility to and increase protection against corruption. SMEs would greatly benefit from the opportunity of being a part of a collective action coalition both in terms of protection and the trickle-down effect of knowledge from multinational companies.

In addition to working together with SMEs, TI Cambodia will conduct case studies on key corruption issues that SMEs and young entrepreneurs face. TI Cambodia also seeks to establish a SMEs advisory group, which specifically works on key issues for SMEs and develops training materials to address their needs. There is also a general need for advocacy campaigns on the benefits of business integrity and clean business models in order to raise awareness among the private sector and showcase that it is actually possible for companies to resist corruption and still be running a financially successful business.

TI Cambodia will seek to **enhance the knowledge and understanding of corruption in the private sector through a variety of interventions ranging from advocacy campaigns and research to training sessions**. TI Cambodia will also seek to utilise the leverage and economic power of multinational companies to promote a cleaner business environment and identify and eliminate key corruption issues that companies face in their day-to-day operations. This project is currently being piloted in Malaysia, and TI Cambodia seeks to roll out the project in Cambodia once the pilot has been successfully implemented. The assumption is that multinational companies hold

the power to influence reform and if there is a mechanism to channel their demands, TI Cambodia will serve as the link between the government and multinational companies.

An **annual conference on business integrity** will be held in order to keep the topic in the public spotlight and to have an opportunity to promote key reforms in the private sector that will benefit clean companies.

Goal 5: Strengthen the capacity of TI Cambodia to manage and support a social movement against corruption.

TI Cambodia will create mechanisms to encourage institutions and individuals to become “members” of TI Cambodia and support collective action. TI Cambodia will establish a Membership Accreditation Committee in its Phnom Penh office to manage and oversee the membership programme.

A broad foundation of support through the membership programme will further strengthen people’s commitment to TI Cambodia and also forge a governance structure that is even more transparent and democratic than the current structure of the organisation. The support for TI Cambodia has been highlighted in reviews as a particular strength, and in the new strategy steps will be taken to institutionalize this support to improve the sustainability of TI Cambodia.

The membership scheme will facilitate fundraising from the public although the possibilities are limited. TI Cambodia will undertake campaigns to build unrestricted emergency funds. Synergies between Goal 3 and Goal 4 where TI Cambodia can link experts to the broader public is one example of how to create revenue. TI Cambodia will continue to be donor dependant but take steps to diversify donors in order to improve the sustainability.

TI Cambodia will build and strengthen the capacity of its staff and members through training and capacity building programs. The objective of the capacity building is to strengthen both the individual and institutional capacity of TI Cambodia. A stronger emphasis on staff training covering all aspects of programme implementation as well as technical training on anti-corruption will be formalised in the new strategy.

Using its existing network of partners, TI Cambodia will establish its presence in the provinces, starting with five pilot provinces. Two designated representatives in each province will coordinate a “committee of citizens” consisting of volunteers.

TI Cambodia will design a comprehensive capacity development plan. One full-time staff will be assigned to focus on building resources and capacity to ensure that people across the movement have the capacity to support the actions through:

- Intensive training workshops/camps for communities.
- Exchange visits for the staff (Phnom Penh/provinces and abroad).
- Production of a training manual and curriculum.
- Use of ICT: online learning tools.

Expected Programme’s Impact: *Enhanced capacity of civil society and citizens/youths groups and increase their participation in the fight against corruption.*

Expected Programme’s Outcomes:

Outcome 1: *Enhanced foundation and capacity of TI Cambodia’s management to effectively manage and deliver results at the national, subnational and local levels.*

We will **enhance capacity of TI Cambodia’s management staff** at the national and subnational levels on management and technical skills and equip them with anti-corruption tools necessary for them to deliver results more effectively and efficiently. A capacity needs assessment will be conducted to identify strengths and areas of improvement for staff. Action plan for capacity building will be developed and implemented. A follow-up action plan will be developed to monitor the improvement of staff.

TI Cambodia's governance structure will be enhanced to ensure an adequate response to the changes of the strategy from 2016-2020. We will review and adjust TI Cambodia's Structure to respond to the new strategy and ensure effective delivery of expected results. A number of TI Cambodia's **internal policies and guidelines** will also be developed, reviewed and improved including the grant management guideline, IT policy, M&E framework, programme implementation guideline and the office and property usage policies.

In the next five years, we will **expand our presence at the sub-national level**. We will identify and select 5 regional provinces and properly establish our working structure to coordinate our local initiatives. We will form "**the Citizens Committee (CC)**", which will be comprised of high profile people from CSOs, the private sector and youths. Through CC, we will recruit a **local team of interns and volunteers** to oversee the operation of the local presence. We will form Youth Clubs, Teachers, Farmers and Parents Groups in the selected provinces. These groups will work with us to **initiate and implement local initiatives** to address concerns in the community and promote integrity, accountability and reduce corruption in Cambodia. We will strengthen capacity of these local groups and youth clubs on programme management, finance and technical skills and build on their knowledge and understanding of anti-corruption frameworks such as the Anti-Corruption Law, UNCAC and other anti-corruption tools.

Outcome 2: Increased membership of TI Cambodia and increased commitment among citizens/youths/institutions to promote integrity and take action against corruption.

In the next five years, TI Cambodia will become a **membership based-organisation**. Based on Transparency International's existing membership policies, we will develop "Individual and Institutional Membership Appointment Policy" for TI Cambodia and get it approved by the Board of Directors of TI Cambodia. The implementation guideline will be developed and piloted before we can invite people to be members of TI Cambodia. We will publicly launch this initiative and provide proper orientation to the public about this intention and our expectations. Both individuals and institutions will be eligible to apply and go through processes to become a TI Cambodia member. We will start with small members first and eventually expand our scope as we go. It is strategically important to build the support foundation of TI Cambodia. Only with support from the local population can a sustainable TI Cambodia be ensured. We would like to see a TI Cambodia that belongs to its local population and be the national chapter that serve the interests and needs of the population. However, a wise strategic approach will be employed to safeguard the core principles and integrity of TI Cambodia as we embark on this new journey. Political dimension, which its members may bring in, can undermine TI Cambodia's independence and its ability to confront critical challenges the country is facing. Through our rigorous selection process, we will be able to stay vigilant and scrutinise potential members of TI Cambodia. TI-S will continue to support TI Cambodia on this aspect and provide both technical and financial support as we move forward.

Outcome 3: Improved capacity of TI Cambodia's funded partners to deliver expected results more effectively and efficiently.

To ensure the effectiveness and efficiency of our partners' results delivery, we will develop capacity building activities for our partners. A Capacity Need Assessment will be conducted to identify areas for capacity improvement, which can encompass programme management, finance, audit, M&E and technical skills on anti-corruption. We will also follow-up with them on a regular basis to evaluate progress. We will also look to build capacity of CSOs in its institutional and financial sustainability by introducing them to our compliance mechanism and funding sources. Skills on proposal writing, financial management, anti-corruption mechanism and networking will be provided to partners.

Goal 6: To provide evidence based research and studies on corruption-related topics and adequately respond to emerging corruption cases or abuse of power where TI Cambodia believes its intervention is necessary and within its mandate.

As the corruption and political context of Cambodia may evolve over the next five years, TI Cambodia will be equipped and prepared to respond to any emerging corruption issues or abuse of power that may occur from time to time, when we believe that TI Cambodia's intervention is necessary and within its capacity and mandate.

Financial resources will be allocated for this component to allow TI Cambodia to stay relevant and effective in addressing important issues as well as in grasping opportunities to make positive impacts in Cambodia.

A Task Force, comprising of members of the Management Team, a Specialist, relevant staff and possibly the members of the Board of Directors or Individual members will be formed to execute these "quick-response" initiatives. A consultant may be hired to lead or coordinate this project if deemed necessary.

Expected Programme's Impact: *Well-informed anti-corruption stakeholders and citizens on the state of governance, sector-based studies on corruption issues that affect the lives of people/business community, and addressed emerging corruption cases or abuse of power.*

Expected Programme's Outcomes:

Outcome 1: *TI Cambodia responds to emerging corruption cases or abuse of power where the organisation believes its intervention is necessary and within its mandate.*

It is crucial that TI Cambodia remains relevant and on top of important issues that will emerge out of changes in the country's political situation and landscape. To ensure that this will be achieved, adequate budget is allocated for TI Cambodia to respond effectively and in a timely manner to emergent issues, which TI Cambodia believes to be crucial to the public and adds value to the process of democratic reform. The intended outcome of this component remains unclear at this stage. We will, however, consult closely with the Management team and if necessary with the Board of Directors of TI Cambodia for their approval on any emerging issues that need to be addressed by TI Cambodia.

Outcome 2: *Enhanced knowledge and understanding of corruption and its effects on peoples' lives, society and country's development through evidence-based research and studies.*

TI Cambodia will continue to enhance knowledge and keep stakeholders informed about corruption-related issues through our evidence-based research and studies. For the next five years, we will conduct a number of research/studies on corruption-related issues as well as produce a few key policy positions. Based on the NISA, a few key sectors need to be studied in detail, such as the bribery in public health service delivery, and bribery and corruption in public service delivery at the commune level. In 2018, we will conduct another NISA as a follow-up to the first one, which was released in 2014. The Youth Integrity Survey (YIS) will be conducted in 2019, also as a follow-up to the initial one released in 2015. These two studies will enable us to assess progress and to identify areas of improvements in comparison to the previous NISA and YIS. We will also conduct the Business Integrity Country Assessment (BICA) in 2017 to assess the state of corruption in the business sector in Cambodia. Furthermore, we will produce a policy paper on beneficial ownership

in the real estate sector. These studies/research will help to enhance knowledge and understanding on the state of corruption and challenges of democratic reforms in Cambodia. They will inform both TI Cambodia as well as its partners' strategy on anti-corruption in Cambodia. TI Cambodia is very fortunate to be able to access the most advanced research tools such as NISA, YIS and BICA, developed by TI-S, chapters and anti-corruption think-tanks from around the world. A research team at TI-S will also stand ready to provide supports and quality assurance of the research to TI Cambodia. We will also bring in local experts and researchers on various fields to advice us on direction, methodology and approach, as well as take lead in conducting our research and studies.

Outcome 3: *Increased anti-corruption momentum and commitment from individuals and institutions at all levels through public fund raising campaigns and initiatives.*

In the next five years, TI Cambodia will engage citizens and youth more actively in mobilising joint forces against corruption through different platforms. Public fundraising will play a crucial role in engaging the public in our causes against corruption as it will not only generate additional financial resources for TI Cambodia to deliver on its policies, but also increase citizens' commitment against corruption. Building upon the previous analysis and consideration on the fundraising aspect, a fundraising strategy will be developed in the first year and we will implement some key public fundraising initiatives such as gala dinners, crowd funding, collecting funds via boxes, Bon Pkar (fundraising event through monks) and cycling/half marathons against corruption. Although we will not expect any significant donations from these initiatives, they will represent the will of the people to take part in the fight against corruption and their sense of belonging to the social movement against corruption mobilised by TI Cambodia. Various platforms, which are friendly and convenient for people to donate, will be introduced to people such as through mobile phone, Wing and micro-financiers in the country.

BUDGET

GLOBAL BUDGET SUMMARY BY GOALS July 2016- December 2020

PROGRAMMES	Amount in USD					Grand Total
	July-Dec 2016	2017	2018	2019	2020	July 2016-2020
GOAL 1	223,471	477,297	405,194	400,752	402,416	2,168,790
GOAL 2	77,444	152,933	159,343	150,325	152,487	747,334
GOAL 3	376,491	653,066	621,036	621,111	587,345	3,082,017
GOAL 4	81,565	179,081	170,947	189,191	156,045	817,030
GOAL 5	88,058	175,998	156,036	171,339	170,769	825,127
GOAL 6	131,475	216,235	219,766	214,902	163,962	1,050,449
Grand Total	978,504	1,854,610	1,732,323	1,747,619	1,633,023	7,946,079

MONITORING AND EVALUATION (M&E)

TI Cambodia's M&E unit has been set up with a strong core team to ensure that TI Cambodia's programmes are on right track and on target and that the desired outcomes and impacts are achieved at a high level. Over the course of time, the unit has become well established, having requisite resources and adequate capacity to ensure the effectiveness and efficiency of its programme activities as well as accountability to all relevant stakeholders

The M&E core team consists of an M&E specialist, the Director of Programmes and a Programme Assistant. Despite being small in number, the team has rich knowledge and has vast experience in project management and statistics, acquired from many years of work in the area with local and international NGOs as well as numerous capacity building training courses both in country and overseas.

Fully aware of the importance of having a well-functioning M&E system in place, TI Cambodia has developed an M&E database, where data can be easily stored in and retrieved from TI Cambodia's local server. This database has been developed and is now ready. It will be used to keep track of all programme activities by monitoring actual implementation of the activities against the plans throughout the next five-year period. It allows each programme manager/officer to input activity plans as well as the outputs including participants/beneficiaries who joined and gained benefits from the activities. In addition to keeping record of programme activities and participants, this database is also used to store all reports and documents related to an activity as reference. The M&E unit can obtain any information from this database very easily and quickly. Microsoft Excel and SPSS can be used as analysis tools to get any required statistics from this database for reporting and M&E purposes. With the M&E database and field visits, the M&E team can monitor the progress of each programme activity very effectively.

Apart from the M&E core team, each programme manager with their team members also play a critical role in the M&E. All TI Cambodia's programme managers are well trained and experienced in project management and monitoring and evaluation. They are in charge of decision-making and day-to-day operation of their programme and work with their programme officer and programme assistant to ensure smooth implementation of the activities. The programme managers are responsible for planning, implementing and reporting to ensure the successful delivery of the expected outputs and outcomes set forth in the programme's results framework. The programme managers make sure all data from their activities is properly recorded into the M&E database.

Additionally, to evaluate outcomes or impacts of our programme, TI Cambodia will adopt a baseline and endline study. A baseline study will be conducted before a planned programme activity takes place, while a corresponding endline evaluation study will be conducted between six and nine months after the end of the programme. By employing this tool, TI Cambodia can find out whether the implemented activity produced the desired outcome/impact as projected in the plan. Many data collection tools will be utilised to collect data for our evaluation, including surveys, focus group studies, in-depth interviews and the most significant change.

At the moment, TI Cambodia has collected a number of useful M&E tools from different sources such as from regional chapters, TI-S and online sources. With all these tools on hand and past experience, TI Cambodia is confidently capable of handling M&E work for the next five-year programmes to a high standard.

SUSTAINABILITY

Institutional Sustainability

TI Cambodia is very fortunate to be a part of a strong and powerful Global Anti-Corruption Movement, which has its presence in more than 120 countries worldwide. TI Cambodia, like other chapters, is enjoying great autonomy over its strategic directions and finance although we practice the same core principles and values and adhere to a governance system that meets an international standard. This has allowed each chapter to design their priorities based on their country's needs, while taking advantage of available and accessible international expertise, best practices and knowledge on anti-corruption as well as anti-corruption tools. For the past three years, TI Cambodia has adopted a number of practical tools and taken advantage of existing expertise from TI-S and other chapters to maximise the impacts of both programmes and operations. Through training and workshops conducted by TI-S and chapters, TI Cambodia's Board of Directors and management team have acquired a significant knowledge base on good governance and anti-corruption. A number of research tools were adopted into the Cambodian context, and technical supports were provided to our local research team, ensuring that the research met an acceptable standard and its findings are reliable. TI Cambodia is also a member of other anti-corruption coalitions such as UNCAC and existing platforms such as OGP, EITI and IACC, where the international anti-corruption activists and key players meet to discuss the anti-corruption agenda at the global level and share knowledge/best practices on anti-corruption. These networks, combined with its local knowledge and expertise in the country, make TI Cambodia a relevant and capable partner in the fight against corruption in Cambodia.

TI Cambodia's governance system is very robust and resilient to both internal and external influences. TI Cambodia was able to attract highly qualified and eminent individuals to serve at its management level. Its Board of Directors and management team is comprised of high-profile individuals from diverse backgrounds and expertise gained from reputable institutions such as the UN agencies, DPs and NGOs. Its Board of Governance is comprised of individuals from the government, the private sector and NGOs, who ensure proper checks and balances within the organisation. With the support for SIDA and TI-S, TI Cambodia equips itself with all necessary policies and regulations to safeguard and preserve the integrity of the organisation. This strong governance foundation ensures that TI Cambodia as an institution is strong and possesses adequate capacity to guarantee effectiveness, efficiency and transparency in its operations and delivering results.

Since the inception of its programmes, TI Cambodia has delegated greater ownership to its partners and encouraged them to take the lead in designing and implementing joint initiatives. These initiatives will, as a result, ensure that anti-corruption issues are well integrated into these partners' agenda in the long run. TI Cambodia works with a number of key partners who are specialised in good governance and corruption-related issues and have been present in Cambodia for three decades such as CCC, NGO Forum, API, CISA, CCIM, WMC and CCSP. Corruption and social accountability issues remain at the top of their priorities, meaning that TI Cambodia's anti-corruption work is taken further independently. We have enhanced capacity of our partners on legal and regulatory framework on anti-corruption and provided them with practical tools on anti-corruption and social accountability, which they could use to maximise the impacts on the ground. This will ensure a greater ownership and more sustained anti-corruption work on the ground.

Strengthening social demands through education and youth empowerment is also fundamental to ensure the creation and maintenance of a vibrant countrywide network of anti-corruption activists. This will help create momentum for anti-corruption reform long term. TI Cambodia's youth led initiatives have proved to be effective, not only in educating youths on the harmful effects of

corruption on society, but also, in influencing their attitudes and behaviours towards integrity and moral obligations. TI Cambodia believes and hopes that they will use the knowledge they have gained in good faith and live their lives with integrity.

Furthermore, the NISA report's findings and recommendations will serve as evidence-based references for future reforms and advocacy from all relevant stakeholders long term.

Financial Sustainability

With regard to financial sustainability, donors will remain the main source of funding in the short and long term strategies of TI Cambodia. However, TI Cambodia has taken some steps to initiate some public fund raising activities from this year forward, although the expected income will be very modest. Moreover, TI Cambodia is planning to become a membership-based organisation in the near future. TI Cambodia will provide greater ownership to citizens and youths to take part in the decision making process regarding the leadership and strategy of TI Cambodia. This will, in turn, ensure the future existence of TI Cambodia and its programmes' sustainability.

ANNEXES

Annex 1 3 Year Budget and Work Plan (July 2016 – June 2019)
Annex 2 Results Framework
Annex 3 Risk and Mitigation Plan
Annex 4 Organisational Structure
Annex 5 Budget Development Guidelines
Annex 6 M&E Framework [to be developed and submitted later]

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