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Sida Decentralised Evaluation

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Mid-Term Review of Sweden's Support to Transparency International Cambodia

Final Report

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**Final Report
October 2014**

**Ali Dastgeer
Jups Kluyskens**

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Abbreviations and Acronyms

A2I	Access to Information
ACL	Anti-Corruption Law
ACU	Anti-Corruption Unit
ALAC	Advocacy and Legal Advice Centre
API	Advocacy and Policy Institute
APLE	Action Pour Les Enfants
ASEAN	Association of Southeast Asian Nations
BIP	Business Integrity Programme
C.CAWDU	Coalition of Cambodian Apparel Workers' Democratic Union
CCC	Cooperation Committee for Cambodia
CCHR	Cambodian Centre for Human Rights
CCIM	Cambodian Centre for Independent Media
CCSP	Cambodian Civil Society Partnership
CHRAC	Cambodia Human Rights Action Committee
CISA	Coalition for Integrity and Social Accountability
CNRP	Cambodia National Rescue Party
COMFREL	Committee for Free and Fair Elections in Cambodia
CPI	Corruption Perception Index
CSO	Civil Society Organisation
DFAT	Australian Department for Foreign Affairs and Trade
DP	Development Partner
ERA	Electoral Reform Alliance
IJM	International Justice Mission
IRI	International Republican Institute
KIND	Khmer Institute for National Development
MoEYS	Ministry of Education, Youth and Sport
MoJ	Ministry of Justice
MoU	Memorandum of Understanding
MTR	Mid-Term Review
NCAC	National Anti-Corruption Unit
NDI	National Democratic Institute
NGO	Non-Governmental Organisation
NISA	National Integrity System Assessment
OCAT	Organisational Capacity Assessment Tool
OGP	Open Government Partnership

ABBREVIATIONS AND ACRONYMS

Sida	Swedish International Development Cooperation Agency
TI	Transparency International
TIC	Transparency International Cambodia
ToR	Terms of Reference
UNCAC	United Nations Convention Against Corruption
USAID	United States Agency for International Development
WMC	Women's Media Centre of Cambodia
YIS	Youth Integrity Survey

Preface

This Mid-Term Review of Sweden's support to Transparency International Cambodia was commissioned by the Embassy of Sweden in Cambodia and undertaken by an evaluation team from Indevelop during the period of June - September 2014 under Sida's Framework Agreement for Reviews and Evaluations.

The team consisted of Ali Dastgeer (team leader) and Jups Kluyskens. Jessica Rothman was the project manager for the review and quality assurance was undertaken by Ian Christoplos.

Executive Summary

The Mid Term Review of the Swedish support to Transparency International Cambodia (TIC) was undertaken during the third quarter of 2014. Sweden and the Australian aid programme provide core support to TI Cambodia to support the implementation of its Strategic Programme 2012-2015. As of June 2013, TIC is currently a ‘Chapter in Formation’, and is in the process of applying to become a TI National Chapter.

Swedish support enables TIC to implement the four priority goals of the Strategic Programme:

- To diagnose corruption issues and use findings as a reference to stimulate more informed debates and to formulate more projects on anti-corruption;
- To build and support partnerships and coalitions of civil society organisations to fight corruption more effectively;
- To engage citizens and the youth in promoting integrity more actively; and
- To build governance foundations and operational structures and processes for the establishment of the TI National Chapter in Cambodia.

The MTR conclusions elaborated according to the OECD-DAC criteria are:

Relevance: The work of TIC is extremely relevant. In 2013, Cambodia was 160th out of 177 countries in the Corruption Perception Index (CPI). Corruption is considered a major problem for the business environment and overall governance, and acts as a deterrent to investment in the country. Specifically, TIC has undertaken two major studies: the National Integrity Survey Assessment (NISA) and the Youth Integrity Survey (YIS). The former has just been launched while the latter will be published in 2015. The research undertaken in NISA and YIS was needed as no such comprehensive information on national integrity issues, and youth perceptions and attitudes existed till now. It will enable TIC to advocate for reforms based on the evidence gathered and the findings of these reports will permit TIC to target specific issues and engage with responsible stakeholders, including seeking support for its work.

Engagement in elections was relevant, as the elections dominated the national governance agenda in 2013-14. It was important for TIC to engage in this national process where corruption is seen as being rife. TIC’s focus on the youth is also very important. One third of the population in Cambodia is aged 15-24 and two thirds is below the age of 30. It is considered to be a segment of the population that is less tainted by corruption and more driven for change.

Efficiency: By using existing CSOs and CSO networks, and those who are already involved in similar work, TIC has avoided setting up parallel structures. It has been able to have a louder voice and larger geographical outreach by partnering with and

providing support to like-minded competent institutions. TIC also provides financial support to two civil society radio networks to broadcast weekly nationwide discussion programmes on corruption and anti-corruption issues. Further, TIC carefully selects participants for youth camps, and after the trainings uses them in follow-on activities to promote awareness of anti-corruption and undertake ‘Commune Monitoring Projects’ in education, health and public service delivery.

Effectiveness: TIC’s partners including national CSOs and international projects rate the organisation as extremely thorough and professional. Collaborative activities undertaken with them include:

- A National Anti-Corruption Conference on Education. During the conference the government assured it would take steps to check the selling of textbooks, which are supposed to be supplied free, to students.
- Training of 250 youth through organising workshops on integrity and social accountability at commune level. The youth trained then raise awareness on anti-corruption in their communities, attend commune council meetings and raise community concerns on transparency and social accountability.
- Anti-corruption training of office bearers in commune councils.
- Advocating for laws which promote transparency and anti-corruption such as laws on access to information and on the rights of NGOs. Together, TIC and other CSO networks and forums advocate for reform of the laws already passed related to the judicial system and reforms of the electoral process.
- Monitoring of the electoral process during the national elections of 2013.

Youth Camps: Three youth camps have been organised in provinces for 250 youth leaders. The camps have helped nurture a cadre of youth leaders committed to fighting corruption. At the end of the camps, the youth had to implement projects that raise awareness of corruption and/or promote dialogue between public officials and citizens on issues of corruption in public service delivery. Thus, youths who attended the camp were given a small seed grant to implement initiatives of their own to further promote integrity in their respective communities and engage their peers in the fight against corruption.

Journalists’ Training: Thirty-six journalists from print, radio and social media have been oriented to the work of TI Cambodia and corruption issues and they have produced several video and radio spots. They were provided training in how they could report corruption stories objectively and factually by using multimedia tools.

Anti-Corruption Unit: A 3-year partnership was signed in 2012 with the government’s Anti-Corruption Unit (ACU). The MoU envisaged the two organisations working together on raising public awareness on anti-corruption issues. The relationship with the ACU has soured because of, amongst other events, a) TIC’s participation in election monitoring in 2013, b) the publicising by TIC of Cambodia’s extremely poor showing in the TI Corruption Perception Index (CPI), and c) the comments of TIC which are quoted in the media lamenting the ACU’s weakness in

fighting corruption. Submission of cases to the ACU related to corruption investigations has also stalled.

ALAC: In 2013, TIC established the first Advocacy and Legal Advice Centre (ALAC) in the region. ALAC a) provides legal advice and assistance to victims or witnesses of corruption, b) helps citizens pursue corruption-related complaints, and c) undertake advocacy for broader reform. If ALAC is measured by the number of calls it has received or dealt with, its success is limited. So far, the Centre has received 200 cases of which 66 relate to corruption. No case of success can be claimed so far. One reason for this is the poor response from the ACU which has not responded to either of the two cases submitted by TIC so far. ALAC has also provided legal training and awareness on the Anti-Corruption Law and its own functions to NGOs activists, youth, journalists, students and others.

TIC has also engaged with the private sector on business integrity issues, but with less success. It has limited expertise in development or application of business integrity tools.

Impact: It is too early in TIC's existence to expect it to have made an impact in reducing corruption. However, TIC has contributed significantly to greater understanding & awareness of corruption through public forums, youth camps, journalists' training, radio programmes etc. There is a greater realisation amongst the Cambodian citizenry that corruption is harmful for the country. TIC has worked effectively and created strong alliances with like-minded organisations.

Sustainability: TIC will remain reliant on support from development partners for the near future. Limited revenue is possible from membership fees, business integrity or other sources. Those models will take time to be introduced and embedded.

However, technical and institutional capacities continue to develop. Staff strength has increased from 3 in the beginning to 40 today. The organisation possesses structures and transparent financial, procurement and administrative policies and procedures. For dealing with its sub-grantees, guidelines have been developed and are applied. Apart from a general assessment and an assessment of the proposal, potential partners are assessed on their programmes, and the financial, administrative and human resource management. During implementation, on-going monitoring is undertaken by TIC through both review of reports and monitoring visits. Every quarter, reviews of the financial management system of the partner organisation are also undertaken.

Recommendations:

Strategic recommendations include that TIC focus its work on the reform of anti-corruption laws including whistle-blowing and complaint handling procedures, and related laws including access to information as identified by the NISA. The ALAC

could be more effective if focussed on enhancing awareness amongst citizens and accumulating evidence. TIC should sharpen focus in the next phase on specific topics and sectors e.g. land grabbing, youth, cost of receiving public services and electoral reforms. It should aim to get deeper into sector specific issues moving on from general awareness raising. It should also forge stronger relationships with sub-national NGOs to broaden coverage across the country. The business integrity programme needs to be reoriented so that it focuses on awareness raising in the private sector, rather than viewing the latter as a possible revenue-generating source.

In terms of its *Target Groups*, TIC could reinforce the work it has done with youth leaders and young journalists by encouraging them to develop more formal structures such as youth associations. It should initially provide technical and financial support for this endeavour. The youth leaders can be used as facilitators in future camps and for citizen reporting by both TIC and media partners.

In terms of its *own organisation*, TIC is well-placed for moving towards a member-based organisation possibly charging a symbolic fee in the start. Its initial constituency could include private individuals, CSOs and the youth. TIC should further explore strengthening synergies amongst the various goals especially goals 2 and 3.

Regarding its future strategy of *Engagement with Government*, it should continue to identify opportunities to work with the ACU. However, beyond that body, it should identify and engage with reformists within government bodies and broaden engagement with other government agencies including the recently formed Tenth Commission on Investigation and Anti-corruption in the National Assembly.

Dialogue with other *Development Partners* needs to be actively stepped up, emphasising preference for pooled funding as otherwise there is a possibility of TIC being diverted from its focus. Sweden and Australia should actively identify and link up TIC with relevant development partners.

Finally, TIC needs to provide greater evidence that it is changing attitudes to corruption in the country, especially amongst the youth and CSOs. So far, such evidence is anecdotal.

1 Introduction

1.1 OVERVIEW

This report is the Mid-Term Review (MTR) of the Swedish support to Transparency International Cambodia (TIC). The review was undertaken in the second half of 2014 between June and September, with the fieldwork being performed in August 2014. Swedish support to TIC began in 2012.

The report will begin in this chapter with a brief introduction to the purpose of the mid-term review. It will then describe the methodology used to undertake the MTR. Chapter 2 provides the background and context within which Swedish support has been provided to TIC. In Chapter 3, we discuss the main findings of the MTR looking at the activities that TIC has undertaken so far, the partners it has worked with and its achievements both programmatically and in terms of organisational growth. Chapter 4 focuses on the conclusions reached assessed according the 5 OECD-DAC criteria: relevance, efficiency, effectiveness, impact and sustainability. The report concludes with key recommendations listed in Chapter 6 addressed both at TIC and Sida for the remaining period of support for this phase until 2015 and the forthcoming one.

The purpose of the MTR was to assess the performance of TI Cambodia against the TI Cambodia Strategic Programme Document 2012-2015 and associated Result Framework, to make conclusions and recommendations for the remaining period of the Strategic Programme and for a Strategic Programme after 2015. The complete ToR is provided in Annex A.

1.2 METHODS

The MTR began with a review of documentation provided by Sida and TIC, and material available on TIC's website. This included the initial proposal and agreement, progress reports, TIC's workplans and results frameworks, newsletters published by TIC, the Cambodian government's development strategy and Swedish development cooperation strategy for Cambodia. Based on this review, the evaluation questions given in the ToR (Annex A) were further elaborated into sub-questions. A complete list of documentation consulted, both during the inception and implementation phases of the MTR, is provided in Annex D.

The fieldwork was conducted over two weeks, and during that time a diverse range of stakeholders were met. These included:

- Transparency International's Board of Directors, its management, programme and operations staff

- TIC's development partners i.e. representatives of the Swedish and Australian governments.
- International agencies and bilateral donors which undertake work on governance issues in Cambodia i.e. the World Bank, USAID and UNESCO
- Government agencies tasked with anti-corruption and public audits i.e. the concerned parliamentary commission and the key government body mandated with tackling corruption i.e. the Anti-Corruption Unit.
- The main opposition party i.e. the Cambodia National Rescue Party
- CSOs that TIC has collaborated with or supported on governance and anti-corruption issues
- The National Democratic Institute with which TIC worked on general election monitoring in 2013
- Media houses which TIC works with to promote awareness on corruption issues
- Beneficiaries of TIC's interventions including youth who attended its camps and journalists who attended its trainings
- Private sector companies which have engaged with TIC on business integrity issues

A complete list of persons met is provided in Annex C. In most cases, the discussions were in the form of individual interviews. In other cases, such as meetings with the Board of TIC, the youth and journalists, focus group discussions were used which proved to be efficient. Telephone interviews have also been held with the TI Secretariat in Berlin and the TI Chapter in Bangladesh - both of which have supported the capacity development of TIC.

The in-country mission started and ended with a joint briefing to TIC management, the Embassy of Sweden and the Australian Aid Programme (Department for Foreign Affairs and Trade).

1.3 LIMITATIONS

Despite repeated efforts, the Ministry of Justice was unable to extend time for an interview. TIC has been trying to work with the Ministry of Justice on judicial reform. Also, no meetings could be organised also with the National Anti-Corruption Council (NACC). It has generally been more difficult to obtain time for interviews from government representatives.

2 Background

2.1 THE CONTEXT

Cambodia is ranked as the most corrupt country in ASEAN by Transparency International's Corruption Perception Index (CPI)¹ and according to the Global Corruption Barometer (GCB), the public sector, police and judiciary are perceived as the most corrupt institutions by the public². The recent survey of the International Republican Institute (IRI) also revealed a general lack of confidence in the Government by the Cambodian population³. The survey pointed out that corruption and nepotism are the root causes of this phenomenon.

In its long-term development vision document, the Rectangular Strategy for Growth, Employment, Equity and Efficiency Phase III, the Government of Cambodia states that during 2013-2018, it will “continue the fight against corruption” by

1. Strengthening education “to stop corrupt practices”: through promoting the dissemination of the Anti-corruption Law to raise awareness of the consequences of corruption and to discourage corrupt practices.
2. Preventing corruption: through encouraging civil servants at all levels to conduct themselves better professionally and morally, and by taking measures to strengthen oversight institutions amongst other matters.
3. Suppression of crimes by referring all cases to court through taking firm and strict measures against those who are found to be involved in corruption and strengthening the capacity of the Anti-Corruption Unit, especially in investigation and law enforcement.⁴

Further, during its third mandate, the Cambodian government stated that it would focus its efforts to ensure an effective implementation of its Governance Action Plan, which covers four crosscutting areas:

- (i) combating corruption
- (ii) judicial and legal reforms,
- (iii) civil service reform covering decentralisation and de-concentration, and

¹ www.transparency.org/news/feature/cambodia_corruption_concerns_amid_hopes_for_the_future

² <http://ticambodia.org/index.php/news/pressrelease/2013-global-corruption-barometer>

³ <http://www.iri.org/news-events-press-center/news/iri-cambodia-survey-declining-optimism-country's-direction-strong-supp>

⁴ Royal Government of Cambodia (2013). “Rectangular Strategy” for Growth, Employment, Equity and Efficiency Phase III Of the Royal Government of Cambodia of the Fifth Legislature of the National Assembly p.14

(iv) reform of the armed forces, especially demobilisation.

It should be acknowledged that the government has taken a number of steps to tackle corruption. The country, emerging from two decades of civil war and political turmoil, has suffered from either outdated or non-existent structures of public accountability till recently. Shortly after a bill was passed for its formal establishment, the National Audit Authority was established in 2002. Public financial management and decentralisation reforms have been initiated and Cambodia ratified the United Nations Convention against Corruption (UNCAC) in 2007.

In October 2009, the Cambodian Parliament passed the Penal Code, which contains all of the criminal elements outlined in the then draft Anti-Corruption Law (ACL), including definitions and penalties. The Penal Code came into force in late 2010. In December 2009, the draft ACL was also passed by the National Assembly and Senate in March 2010 and promulgated in April 2010.

Under the law which came into effect in November 2010, two new bodies have been tasked with fighting corruption: a National Council Against-Corruption (NCAC), which will guide the country's anti-graft policies, and an Anti-Corruption Unit (ACU), which will carry out day-to-day anti-corruption work. The ACU started functioning in 2011.

Observers state and events show though that the ACU lacks independence regarding the appointment of its members, who are appointed by government. The ACU's accountability is also limited. Concerning the Anti-Corruption Law, whistle-blower protection needs improvement. Currently, a complainant can be imprisoned for between one and six months if the Anti-Corruption Unit does not find evidence to support their claim. Declarations of the assets of public officials are not available for public scrutiny. Thus, the general Cambodian legal framework still leaves the way open to corruption and non-accountability. Even though judicial and legal reforms are, along with good governance and anti-corruption, top priorities of the Government's Rectangular Strategy Phase III as described above, the actual implementation of these reforms and the genuine commitment to ensure the independence of the judiciary remain uncertain.

General elections were held for parliament in July 2013. The opposition, claiming that victory was stolen from it due to massive fraud, refused to join the parliament. As part of the deal struck between the government and the opposition in July 2014, as a pre-condition to the opposition CNRP's acceptance to sit in parliament, the Tenth Commission on Investigation and Anti-corruption in the National Assembly was created to be chaired by a member of the opposition and comprising eight members with equal representation from both the government and the opposition. Similarly, the government and the opposition agreed to the formation of the 10th Commission at the Senate – Commission on Investigation and Anti-corruption. These two new bodies

open the possibilities of closer engagement between TI Cambodia and the political leadership of the country.

2.2 TRANSPARENCY INTERNATIONAL & CAMBODIA

Transparency International is the global civil society organisation leading the fight against corruption. Through more than 100 chapters worldwide and an international secretariat in Berlin, it 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 Chapter in Cambodia started in 2010 and is one of the recent chapters in formation in South East Asia. Its strategy has been developed based on TI's overall strategy and learning from other countries in the region. TI Bangladesh, for example, has provided advice on the organisation and board while Vietnam's youth programme has provided important lessons for the Cambodia chapter in creating a similar programme. Lessons have been learnt from TI Papua New Guinea on legal advice to citizens who have grievances regarding corruption and from TI Malaysia on improving anti-corruption measures in the private sector. There have also been opportunities at regional TI events to learn from each other and professionalise the Chapter in terms of its organisation, capacity and programmes. The TI Secretariat provided an initial start-up grant to help TIC getting organised, appoint a Board of Directors and Executive Director and develop programmes.

As mentioned, the Chapter in Cambodia started in July 2010 as a National Contact. The Cambodian government officially accepted its registration as Transparency International Cambodia in July 2011. TIC started with a preparatory phase April-September 2012, while the programme implementation was planned for October 2012 to September 2015. The Strategic Programme Document was developed based on inputs and contributions from many stakeholders including donors, civil society organisations, media, youth and students group as well as the Government's Anti-Corruption Unit through an interactive consultation. A donor consultation meeting was held in April 2011 to present the draft Strategic Programme Document and to solicit feedback and comments. Swedish support is based on this Strategic Programme Document and started in October 2012 for an initial period of 3 years.

As a National Contact, TI Cambodia is required to comply with certain policies and guiding principles of TI which are set out in the national chapter promotion agreement. Based on the agreement, TI Cambodia is entitled to apply for status as an Accredited National Chapter of TI when TI Cambodia is able to meet the criteria of accreditation policies of TI. The Accredited National Chapter has rights to vote in the Annual Membership Meeting of TI.

2.3 SWEDEN'S FOCUS ON ANTI-CORRUPTION

Sweden's focus on anti-corruption issues is very much relevant to its bilateral development cooperation with Cambodia, which started in 1987 with humanitarian aid. From 1990 onwards, Sweden continued with long term development cooperation.

The overall goal of Swedish development cooperation with Cambodia is to create favourable conditions for a sustainable and democratic development with increased respect for human rights. Sida's strategy 2012-2013 was based on Sweden's Policy for Global Development and its policy on international development cooperation and analyses of poverty in the country, outcomes and experience from past cooperation, commitments by other donors, and Swedish comparative advantages. Swedish development cooperation was to focus on three areas of cooperation: (1) democratic development and human rights; (2) education, and (3) climate.

Sweden's strategic dialogue with Cambodia, according to the strategy, centres around promoting democratic processes and accountability, e.g. through democratic elections, respect for human rights, gender equality and anti-corruption measures.⁵ The strategy notes that the passing of the Anti-Corruption Law in March 2010 by the Cambodian Government marks an important step in the fight against corruption. During the strategy period, Sweden intended to support relevant initiatives within the framework of the implementation of the new law. The strategy notes that corruption is widespread in Cambodia and constitutes the principal financial risk to development cooperation and to the country's development as a whole. The strategy states that measures to fight corruption will be part of all Swedish activities.

As mentioned above, Sweden provides core support to TI Cambodia to support the implementation of the Strategic Programme 2012-2015, including the establishment of the institution and the cooperation with stakeholders in anti-corruption. Sweden's current core support to TI Cambodia is based on a Grant Agreement between the Embassy of Sweden and TI Cambodia and amounts to SEK 10,500,000 for the period 2012-2015.

Sweden has worked with the Australian Department for Foreign Affairs and Trade (DFAT, formerly AusAID) to support the development of TIC. DFAT has been funding TI Cambodia for a year now. Its agreement with TIC was signed in December 2013. The support is aligned with DFAT's strategic objectives of legal and judicial reform particularly of the criminal justice system. DFAT also has an interest in the engagement of youth as a social force for its focus sector in governance, law and justice. Incidentally, DFAT also provides support to the TI Secretariat in Berlin.

⁵ Ministry for Foreign Affairs, Sweden (2012). *Strategy for development cooperation with Cambodia January 2012 – December 2013*

A Government -Development Partners Coordination Committee (GDCC) was established in 2007 and meets to discuss the national development strategy. At a lower level, there was supposed to be a Technical Working Group on corruption chaired by high level government officials and including development partner and CSO representatives. That Working Group has never been operational and development partners are considering establishing their own coordination mechanism on the subject.

In Cambodia, Sweden works closely with other development partners including the EU and its member states. Currently, Sweden and other European Union development partners working in Cambodia and Switzerland are formulating a European Development Cooperation Strategy. This Strategy, to be operational from 2014-2018, has four priority areas, amongst them governance. The strategy states that European partners will also cooperate closely with the Cambodian Government and other partners to ensure transparency, accountability and probity in the use of public resources and eliminate risks and opportunities for corrupt practices within the public administration and in the implementation of development cooperation programmes. In addition, support will be provided for capacity development and awareness raising programmes with civil society linked to transparency of financial resources and corruption.

3 Findings

As stated in Chapter 2, the Government of Sweden has been supporting TI Cambodia since 2012 in implementing its three year Strategic Programme Together Against Corruption 2012-2015. The objective of the Swedish support is to support TI Cambodia's implementation of the four priority goals of the Strategic Programme:

- To diagnose corruption issues and use findings as a reference to stimulate more informed debates and to formulate more projects on anti-corruption;
- To build and support partnership and coalition of civil society organisations to fight corruption more effectively;
- To engage citizens and the youth in promoting integrity more actively; and
- To build governance foundations and operational structures and processes for the establishment of the TI National Chapter in Cambodia.

In this Chapter, each of the goals will be discussed in detail and the findings, in terms of achievements and issues will be highlighted.

3.1 GOAL 1: RESEARCH & ADVOCACY PROGRAMME

3.1.1 National Integrity System Assessment (NISA)

During the last two years, TIC has been working on the production of this major study. The National Integrity System Assessment is a study of the state of a country's governance system. The study focuses on 13 core governance institutions (or pillars), considered essential for upholding a strong system of integrity: the Legislature, Executive, Judiciary, Public Sector, Law Enforcement Agencies, National Election Committee, Ombudsman, National Audit Authority, Political Parties, Media, Civil Society, and Business. During the process, 76 key informants were interviewed. Of these, 11 were women. Despite repeated attempts, the ACU did not engage in the process despite initially agreeing to. However, other government institutions were consulted.

Each section of the report was sent to the Transparency International-Secretariat in Berlin, Germany, for quality assurance. Transparency International Cambodia organised a National Integrity Workshop in November 2013, inviting anti-corruption stakeholders and institution experts to discuss and review the draft report, as well as develop policy recommendations based on the findings.

In summary, NISA reveals that overall Cambodia has a weak integrity system. The system is not strong enough to uphold the rule of law, ensure sustainable development, and a good quality of life for the population at large. Despite this, some notable

areas of strength do exist. Most notably, some aspects of the legal framework are robust and comprehensive.

NISA has an Advisory Group, the purpose of which is to inform the process of the assessment. It comprises ten men and three women. They helped identify the institutions and people to be interviewed and how each pillar could be adapted to the local context. The group also provided feedback on the draft report, advised on rescoring on certain aspects and recommended that the sources of evidence be made broader.

The NISA was launched as a report on 9 September 2014. TI Cambodia aims to implement an advocacy plan built on the NISA's recommendations. The key NISA recommendations are⁶:

- a) Reform of the Judiciary, including:
 - Ensuring that all courtrooms and court procedures are open to everyone
 - Publishing all decisions of judges as well as the reasons behind them
 - Ensuring that judges are objectively recruited through an independent appointments body, and
 - Review and amendment of the three judicial reform laws passed in May 2014 to ensure independence of the judiciary.

- b) Amendment of the Law on Anti-Corruption, in particular:
 - Removing the relevant article which allows for the imprisonment of a complainant of a corruption-related crime,
 - Amendment of the relevant article to include a provision that asset declarations will be shared with parliament and the public, and
 - Amendment of the relevant article to say that the appointment of the Chairman and Vice-Chairman should be performed in an open and participatory process.

- c) Passing a Law on Access to Information, including:
 - Ensuring maximum disclosure, with limited scope of exemptions
 - Placing obligations on public bodies to disclose information
 - Ensuring the information request process is easy and free or of minimal cost, and
 - Including a protection for whistle-blowers.

- d) Reform of the Public Sector, including:
 - Establishing an independent committee to govern all public servants
 - Publishing details of expenditure, procurement contracts and service fees, and
 - Ensuring adequate remuneration for civil servants.

⁶ *Corruption and Cambodia's governance system. National Integrity System Assessment. Transparency International Cambodia. Pages 10-12*

As follow-up, a proposal has been submitted to the TI Secretariat for financial support to implement the advocacy plan.

3.1.2 Youth Integrity Survey (YIS)

The Youth Integrity Survey was first piloted by TI Vietnam in 2010 and its sampling and methodology were studied prior to conducting a similar survey in Cambodia. The questionnaire was adapted to the local context. The YIS aims to be nationally representative and attempts to quantify the attitudes, behaviours and experiences of youth towards corruption. Twelve hundred youth (603 females and 597 males) were interviewed in 8 provinces between May and June by 23 data collectors, of which 11 were female.

The collection, data entry and primary data analysis have been completed. The survey found that Cambodian youth have a strong moral sense of right and wrong. The overwhelming majority of respondents (90%) felt that the youth had a key role to play in integrity-building and the fight against corruption. Youth were also asked if they had been faced with situations where bribes had been asked for or had to be given, how much awareness they had received on the issue and who they thought were the biggest influencers in terms of providing information and delivering messages to promote integrity. As the results are still not public, this report will not go into the main findings in detail.

TI Cambodia expects to strengthen its youth programme 2015-2020 based on the findings of YIS. A YIS Advisory Group was formed with members from diverse youth institutions and expert organisations. The YIS Advisory Group has met twice, the last time being in August 2014 to discuss the preliminary findings of the survey. It is comprised of three women and four men. The YIS will be launched in February 2015.

3.2 GOAL 2: PARTNERSHIP AND COALITION BUILDING PROGRAMME

Under this Goal, TIC has established a number of partnerships with CSOs. The CSOs include those who work at the policy level, and those working at the grassroots level; those who work with government and others which work with youth and citizens. A number of them are actually networks of CSOs and NGOs working at the national and the sub-national levels. Two characteristics define all the CSOs that TIC partners with. Firstly, they have been operational in the country for a number of years and are thus well-established with experienced backgrounds. Secondly, they have all focussed on issues in which corruption is a core aspect.

3.2.1 National Anti-Corruption Conference on Education (NACC)

TIC organised a workshop in February 2014 to raise issues related to corruption in the education system. Prior to the conference, Khmer Institute for National Development (KIND) which is a national CSO, had undertaken a tracking survey to study the flow of textbook delivery from the central government to upper secondary school level in 2013. Established in 2003, KIND works to promote democracy, anti-corruption, good governance, and involves youth to monitor public services through capacity building and networking.

The survey explored the causes that led to the textbooks, which are supposed to be free, being sold in shops and the delays in their delivery. To disseminate its findings, this national conference on education was held. It was attended by the Ministry of Education, development partners, NGOs, teachers and researchers. TI Cambodia had originally planned the conference for 2013 but had delayed it to after the completion of the survey. One hundred and fifty eight people participated of which 39 were female.

The outcome of the conference was that a directive was issued by the Ministry of Education to its provincial departments to monitor this practice and support sought by it from the Ministry of Interior (which is in charge of law enforcement) to prevent it. Another output was that the Ministry formed a Working Group to look at the flow of textbooks from the national to the sub-national level.

3.2.2 Partnership and Coalition Building with Civil Society Organisations

TIC has established good relationships with CSOs and CSO networks. This has enabled it to efficiently have greater outreach while at the same time promoting the anti-corruption agenda amongst the CSO community. The key CSOs which TIC has partnered with are as follows:

The **Coalition for Integrity and Social Accountability (CISA)** is a national NGO working on anti-corruption issues through capacity building, education, communication and advocacy. It has operated since 2005 as a network and was registered in 2010. In 2013, it received the first of three grants by TIC to work on the project 'Collective Voice Against Corruption'. TIC is currently the NGO's only funder. The grants have been small in size spanning a year at a time. The TIC grant is to both support CISA to build itself as an organisation, and training of youth through organising workshops on integrity and social accountability in the provinces at commune level. For this, CISA uses its member CSOs which provide the field trainers. Of the nearly 250 youth participants in these trainings, 136 are female. As a next step, the youth attempt to raise awareness in their communities and a selected number of them attend commune council meetings and raise community concerns on transparency and social accountability.

In addition, TIC engages CISA in its other activities as CISA is a small NGO which while focussed on corruption, as TIC is, needs strengthening of its capacities especially in fund raising. 900 of CISA-selected observers were engaged in the election process that TIC helped monitor. The collaboration of TIC with other CSOs during the general elections of 2013 will be discussed in detail later.

When the ACU refused to take part in the events being organised by TIC to celebrate Anti-Corruption Day in 2013, TIC organised events in 3 provinces with CISA. Six hundred and fifty people participated of which 304 were female. CISA will also be taking part in the No Impunity Campaign to be organised by TIC and other CSOs later in 2014. It will be responsible for the holding of forums in two of the four provinces selected to hold events.

The **NGO Forum** is a membership organisation that builds NGO cooperation and capacity, supporting NGO networks and other civil society organisations to engage in policy dialogue, debate and advocacy. Its ultimate goal is that the rights of the poor and vulnerable are recognised and supported by the policies and practices of Cambodia's government and development partners, and the wider community. It has around 90 members. TI Cambodia is working with it on the Access to Information Law and is a member of the Working Group on this subject along with the NGO Forum, COMFREL and API (see later).

The **Cooperation Committee for Cambodia (CCC)** was created in 1990 and consists of 160 member organisations. It aims to strengthen the capacities of CSOs in the country. It promotes good governance, operating a certification system aimed at promoting professionalism and good practice within NGOs. It also operates capacity building courses on organisational development and program management including monitoring and evaluation, ICT, human resource management, accounting and financial sustainability. Mentoring and coaching is also provided.

Based on the commonality of their interests and given CCC's network base, CCC and TI Cambodia have established a good partnership to work on issues which have a bearing on corruption. They signed an MoU in 2013 to undertake joint strategic planning and share experiences. These include:

- Law on Association and NGOs. This is still in its draft stage and currently shelved. According to both CCC and TIC, it has many restrictions on the formation and working of NGOs
- Open Governance Partnership: An Obama-led initiative to promote budget transparency, accountability, citizen engagement and technological innovation in governance.
- No Impunity Campaign which will have a bicycle campaign on the 19th of August 2014. Forums will be held in four provinces and a national one in Phnom Penh on the 23rd of November coinciding with the International Impunity Day.

- CCC and TIC has organised a joint workshop to review and organise an advocacy campaign for the:
 - NGO law
 - Cyber Crime law
 - Workers Union law
 - Reform of the laws already passed related to the judicial system (courts, magistracy and judiciary)
 - Agriculture and land use management

Cambodian Civil Society Partnership (CCSP) is an NGO which works on promoting and enabling good governance at a sub-national level. It was created in 2008, but started off as a project called Commune Council Support Project in 2000. It works with partners across government, civil society and the NGO community to raise awareness about decentralisation, and undertakes projects on social accountability, training and capacity building and information dissemination. CCSP has solid experience as a facilitator between government and CSOs. As a sub-grantee of TIC, it was supposed to deliver anti-corruption training to its partner NGOs in two provinces. Then these NGOs went on to train ten commune councils i.e. five councils in each province. Technical support was provided by TIC. A total of 41 participants of whom 13 were female attended these trainings. The participants comprised the commune chiefs, commune councillors and commune clerks.

The **Cambodia Human Rights Action Committee (CHRAC)** is a coalition of 21 NGOs created in 1994 working for the promotion and the respect of human rights, democracy and rule of law in Cambodia. With CHRAC, TI Cambodia undertook monitoring in 2013 of the national elections and a number of joint statements were issued on concerns regarding the process observed by them and other CSOs.

With these partners and others, TI Cambodia has drafted and released a number of joint statements on a range of issues which have highlighted corruption cases. TI Cambodia's involvement in these joint statements is stated to have added credibility to the message that the CSOs have tried to communicate. However, TIC's closeness to these CSOs may have reinforced suspicions of government towards TIC.

3.2.3 Private Sector Engagement

Thus far, TIC has collaborated with only one company in terms of implementing an anti-corruption programme. PACTICS is a Dutch firm which makes eyewear cloth and other protective packaging in Siem Reap in Cambodia. It takes its corporate social responsibilities quite seriously. TIC has so far undertaken a risk assessment of the company's operations in Siem Reap in February/March 2014. Following that, using tools developed by TI Malaysia, which has a more developed business integrity programme, TIC conducted a training in business integrity for 15 key staff of PACTICS. PACTICS welcomes the opportunity to work with TI because of its international profile.

At the same time, PACTICS has felt that the trainings could have been more practically oriented and this would have been aided if TIC had managed to gain a better understanding of the company, how it operates and the issues of business integrity it faces in its business processes. PACTICS also felt that TIC is currently not experienced enough to optimally benefit businesses like itself.

Dialogue and a pilot training with another company URS have not resulted in anything substantial.

3.2.4 Working Groups

Apart from the alliances that TIC has created which have been mentioned above, it has been very active on two fronts: advocating for an Access to Information (A2I) Law and in monitoring of the general elections that were held in 2013 and subsequently highlighting the flaws in the election process.

TIC has a good working relationship based on mutual interests with the Advocacy and Policy Institute (API). API was established as the Advocacy and Policy Program in July 2003, registering under its current name as an independent local NGO in 2007. TIC works with API on advocating for an Access to Information Law which API has been pursuing since a decade. Meetings are regularly held. API was also involved in the monitoring of elections and has participated in several of TIC's events. TI Cambodia is leading a petition among CSOs collecting thumbprints from citizens to demand for the adoption of the Law. To date, more than 20,000 thumbprints have been collected. Other CSOs mentioned above such as CCC and the NGO Forum are also involved in this issue with TIC.

The general elections in Cambodia overshadowed most of the other agendas of development partners and CSOs alike during 2013, and for TIC it was an opportune moment to get engaged in a process where corruption and non-transparency play a major role. The National Democratic Institute (NDI) is a US non-profit organisation which works to support and strengthen democratic institutions through citizen participation, openness and accountability in government. TIC was supported, both financially and technically by NDI, to undertake monitoring of the national elections held in July 2013. TIC was responsible for getting feedback from observers in the field in sample sites. The Coalition for Integrity and Social Accountability (CISA) coordinated and appointed the coordinators in the provinces. After NDI had analysed the data, the 'Irregularity of Elections Report' was prepared. A full-fledged report for public dissemination called 'Election Monitoring Report' was later prepared. Within it TIC highlighted serious deficiencies that its observers had noted. The engagement of TIC in the elections also marked the worsening of its relationship with the ACU.

After the elections, TI Cambodia worked with the Committee for Free and Fair Elections in Cambodia (COMFREL). COMFREL is formed of 10 NGOs and works to promote electoral reforms in the country. Together they and around 20 Cambodian CSOs and a few international NGOs formed the Electoral Reform Alliance (ERA).

Following the elections, in November 2013, the ERA produced the ‘Joint Report on the Conduct of the 2013 Cambodian Elections’ in which irregularities in the election process were identified. The report was based on several sources including the work that TIC did on monitoring during election day in July 2013. TIC actively participates in the proceedings of ERA taking part in lobbying for access to information. ERA has held several roundtables and workshops. The Alliance promotes reform of the electoral process and the National Election Commission as well as greater access to information and transparency in political parties’ campaign finances.

3.3 GOAL 3: YOUTH AND CITIZEN ENGAGEMENT PROGRAMME

3.3.1 Collaboration with the Anti-Corruption Unit (ACU)

A Memorandum of Understanding was signed between the Cambodian Anti-Corruption Unit and Transparency International, Cambodia in July 2012 for a three-year period. It was thought that as both organisations had a commonality of interests, it would be more efficient and effective if they worked together. The ACU also promotes awareness in schools and other institutions regarding anti-corruption. Beyond schools, awareness raising has been undertaken of the military police and citizens through public forums, competitions and seminars. The ACU has also worked with government line ministries to streamline fees charged for public service delivery. Recently, during the MTR visit, it was supporting the Ministry of Education to monitor secondary school examinations and prevent corruption in them.

Under the MoU, TIC agreed to provide a budget of USD 450,000 to the ACU to undertake joint activities over a three year period. The MoU envisaged the bodies working together on anti-corruption through:

- Educating the public using a variety of channels: the media, public forums, music, debates, stories and publicity material
- Working together to assist the Ministry of Education to incorporate anti-corruption education in the school curriculum, and
- Celebrating the National Anti-Corruption day which falls on 9 December every year.

The relationship started off well. In 2012, television spots were produced and broadcast on national television, poetry and slogan competitions were held as well as painting competitions. Hundreds of thousands of posters, stickers and banners were jointly produced. In the first year of the agreement, on 9 December 2013, TIC and ACU jointly organised events with other partners in three provinces on the theme ‘Zero corruption, 100% Development’, with a total of 650 participants (304 females). TIC supported the ACU in the development of the textbooks by funding the visit of one of its staff to Thailand to learn progress made on this process there. Case studies, as specified in the MoU, have not been undertaken. However, an interrogation room was equipped at the ACU.

The relationship with ACU soured because of TIC's engagement in the election process where TIC took part in election monitoring and disseminating the report (mentioned above) on the electoral irregularities that had been observed. The ACU accuses TIC of using the youth against the government - a charge which the MTR has seen no evidence of. Thus, the National Anti-Corruption Day in 2013 was organised without the involvement of the ACU, which had removed itself from any involvement with TIC for the event.

TIC's involvement in election monitoring has not been the only reason for ACU's annoyance with it. ACU was unhappy when TIC released TI's Corruption Perception Index (CPI) which ranked Cambodia among the 17 most corrupt countries in the world, and in 2013 the most corrupt in the ASEAN region. The ACU is also displeased that the TIC is regularly quoted in the media providing comments on corruption cases that sometimes include critical comments about the ACU's weakness in the fight against corruption.

The ACU maintains that that the TIC under the existing law does not have the right to collect evidence and complainants should be referred to the ACU. Disagreements also arose on the placing of logos of TIC and its development partners, who were supposed to originally fund the textbooks, on the textbook covers. The two organisations continue to collaborate but with less intensity than two years ago.

3.3.2 Media Engagement in promoting integrity, transparency and the fight against corruption

Thus far, two Cooperation Agreements have been signed between TIC and Cambodian Centre for Independent Media (CCIM) under which TIC provides financial support to CCIM to broadcast programmes on corruption issues. The radio programme of an hour's duration is broadcast weekly. In addition, as part of the agreement, the Centre conducts Facebook art contests and produces video news reports to be broadcast on its online TV.

CCIM has similar objectives to TIC. It aims at promoting democratic governance and human rights enforcement in Cambodia and it runs its own radio stations. It has coverage of 16 of Cambodia's 25 provinces with a potential audience of 8 million. Its figures show that the TIC sponsored programme on anti-corruption is the most popular of its shows. It carries out monthly caller questionnaires which show that awareness amongst the audience, of corruption and the role of ACU and TIC, is increasing. CCIM also tracks how many respondents have heard of ALAC through its broadcasts. Future plans, if the partnership continues, could include projects such citizen's reporting using TI Cambodia's youth network.

The second media outlet that TIC engages with is the Women's Media Centre of Cambodia (WMC). WMC is a national non-governmental, non-profit media organisation. It delivers national awareness and informative programmes on a range of issues,

with a special focus on the roles and rights of Cambodian women. As far as TI Cambodia's agenda is concerned, WMC also attempts to raise awareness amongst the public on issues regarding integrity and accountability. TI Cambodia funds a weekly hour long programme called New Generation. The radio programme reaches 16 out of Cambodia's 25 provinces. Under the grant agreement, two public forums outside Phnom Penh have been organised and broadcast.

3.3.3 The Advocacy and Legal Advice Centre (ALAC)

The ALAC in Cambodia was established within TIC in September 2013. It is the first in the ASEAN region. The legal team in it has benefitted from a trip to Papua New Guinea to study the ALAC in the TI chapter there. The TI Secretariat supported it through installation of database in the Phnom Penh offices and training in how to operate the database.

ALAC activities are to:

- Provide legal advice and assistance to victims or witnesses of corruption
- Help citizens pursue corruption-related complaints, and
- Undertake advocacy for broader reform.

So far, ALAC has received 200 cases of which 66 relate to corruption. According to ALAC, 5 or 6 cases have been submitted to the ACU by complainants. The rest either were weak cases lacking evidence, the complainants were hesitant to approach the ACU or the complainants are in the process of collecting evidence. No case of success can be claimed so far.

One of the main reasons that the ALAC has not been able to perform to its maximum potential is the poor response from the ACU. While it itself does not have an MoU with the ACU (the MoU is with TI Cambodia and it does not specifically mention ALAC-related activities), ALAC feels it would be better to have one. This is because it is the ACU, which under current legislation, has the authority to approve or proceed with investigations into corruption claims. Without the ACU's assent, the courts are not required to entertain any cases related to corruption.

ALAC receives most of its cases through its two dedicated toll-free numbers. When queries are received, ALAC either provides advice or if the case is not related to corruption, the callers are referred to another more appropriate agency. Cases within ALAC's domain are followed up.

In terms of advocacy, ALAC's legal team take part in the radio programmes to talk about corruption, judicial reform and the work of TI Cambodia. These programmes include those funded by TI Cambodia and others such as those produced by CCHR. ALAC has provided legal training on the Anti-Corruption Law and its own functions to NGOs activists, youth, young journalists, *tuk tuk* drivers, students and others. ALAC staff has actively participated in events organised by other components of TIC including the 9 December National Anti-Corruption Day.

So far, ALAC has signed MoUs with two other organisations. One of them is the International Justice Mission (IJM). The IJM works to protect the poor from violence in developing countries. It partners with local authorities to rescue individual victims of a specific crime and bring criminals to justice. It also works to strengthen the justice systems in countries of operation. In Cambodia it works closely with the anti-trafficking unit of the Ministry of Interior, other ministries and development agencies such as UNICEF. Its work involves cases of corruption which makes it a natural ally of Transparency International Cambodia. At the same time, because TIC had a Memorandum of Understanding with the ACU, IJM thought it useful to work with TI Cambodia. A MoU was signed between IJM and TIC in 2013 for a period of 3 years.

However, after the initial submission of one case on behalf of IJM, TIC ceased submitting any further cases citing inaction on behalf of the ACU and ACU's stand that the investigation of corruption cases was its sole domain. This is despite the view of both IJM and ALAC that that particular case was a strong one.

In turn, the ALAC refers cases of violence submitted to it to the IJM. Apart from IJM, ALAC has signed an MoU with Legal Aid of Cambodia (LAC) which is a Cambodian NGO which provides free legal services for the poor in both criminal and civil cases. It will also sign MoUs with Action Pour Les Enfants (APLE) which is a Cambodian NGO dedicated to combating the sexual abuse and exploitation of children and Cambodian Centre for Human Rights (CCHR) which works to promote and protect democracy and respect for human rights. CCHR focuses primarily on civil and political rights and on a variety of interlinked human rights issues. All these MoUs are supposed to formalise a relationship within which ALAC is referred cases of corruption and it in turn refers cases related to the subject focus of the partner CSO to the latter.

3.3.4 Young Journalist Training on 'Promoting Integrity, Transparency and Fight against Corruption'

Two trainings for journalists have so far taken place: one each in 2013 and 2014. The purpose of these trainings was to provide practical skills to young professional journalists so that they could better report on corruption issues using multimedia tools. Corruption related stories can be told through different media: photography, video and audio, and the training highlighted upon the latest techniques on reporting corruption related stories.

The journalists met during the MTR stated that this training enabled them to enhance their understanding of TI Cambodia and of corruption issues generally. They learnt how they could report corruption stories objectively and factually. It also provided an opportunity for them to engage with each other and form groups to do projects, supported by TI Cambodia, together. In the trainings, TI Cambodia has involved its two media partners CCIM and WMC.

The TI Secretariat was also involved in the development of the training courses. TI Cambodia provided a small seed grant to each group to implement their initiatives producing media related contents. As outputs, after the training in the first year, three video clips were produced. These were shown in an exhibition/media centre in Phnom Penh where youth and journalists were invited. In the second year, 1 radio spot, 1 newsletter report and 1 video clip were produced. None of the spots produced, as an outcome of these trainings, have been broadcast on national media. However, this was the first time such an initiative had taken place. A total of 36 journalists participated in the trainings of which 9 were female.

3.3.5 Youth Engagement Initiative

Till now, three youth camps have been organised in provinces for 250 youth leaders. At the end of the camps, the youth had to implement a project that raises awareness of corruption and/or promotes dialogue between public officials and citizens on issues of corruption in public service delivery. Thus, youths who attended the camp were given a small seed grant to implement initiatives of their own to further promote integrity in their respective community and engage their peers in the fight against corruption. Most of these focused on ‘Commune Monitoring Projects’ in education, health and public service delivery. The findings were presented to the commune councils for improvements, however not without challenges. Some groups faced resistance and even intimidation from local authorities. Initially, TI Cambodia also gave grants to youth to organise concerts and plays, but that was later stopped due the feeling that the outcomes from such activities were limited. The participation of the youth in these camps by gender is as follows:

<i>Activity</i>	<i>Females</i>	<i>Males</i>	<i>Total</i>
1st Youth Camp	58	69	127
Youth projects after 1st camp	970	824	1794
2nd Youth Camp	39	24	63
Youth projects after 2nd camp	897	1037	1934
3rd Youth Camp	29	35	64
Youth projects after 3rd camp	262	220	482

3.3.6 Other Initiatives

TI Cambodia has reached an agreement with Khemarak University of Phnom Penh to include topics on anti-corruption in its curriculum. In this regard, an MoU has been signed and one lecturer has been supported by the TI Secretariat to study in Austria to be trained as a trainer of other lecturers.

TIC submitted a proposal to Development Innovations, a USAID funded project to help foster technology based innovations and solutions that can promote social change. The project involved the training of around 400 youth over a period of 10 days for which the content was provided by Development Innovations. The project focussed on supporting youth to create a Facebook page or blog.

The ‘Innovative Project’ is a 5 week training on good governance, personal development, project management and leadership which ran from the end of June to the end of July 2014. Subsequent to that the trainees had to draft proposals to suggest projects they would undertake to implement what they had learnt. Fourteen proposals have been received.

Garment workers comprise a large segment of factory workers in Cambodia. The Coalition of Cambodian Apparel Workers' Democratic Union (C.CAWDU) is an independent union in Cambodia representing garment worker rights. Working with it, TIC organised a first training of 30 participants in August 2014 to raise awareness about integrity and engage factory workers in promoting social accountability and the fight against corruption. It is expected that the trainees will cascade the trainings to other workers within the factories they work in.

3.4 GOAL 4: BUILD GOVERNANCE FOUNDATIONS, OPERATIONAL STRUCTURES & PROCESSES FOR THE ESTABLISHMENT OF A TI NATIONAL CHAPTER IN CAMBODIA

Australia and Sweden have provided almost 90% of the funding to TIC for its operations and programmes since its creation till now. The other main source was NDI with which TIC collaborated for the monitoring of the general elections in 2013. TI Secretariat supported the organisation in its initial phases and in some capacity building activities. TIC has also benefitted from support by and study tours to chapters in Malaysia, Bangladesh, Vietnam and Papua New Guinea. This enabled the TIC staff to engage with staff of those organisations and study their systems of ALAC, human resources and finance, as well as to take part in activities they organised.

Human Resources: From 2011, when the organisation started with three staff members, TIC has grown into an organisation with 28 staff (of which 11 are female). They are supported by 12 interns and volunteers of whom 8 are female. The organisation has an equal opportunities policy of recruitment. Policies related to maternity leave, for example, are in force. Training needs assessments are undertaken to identify which trainings should be provided and a training development plan is developed after review by the line manager. Performance assessments take place annually.

Organisational Development: In June 2014, an organisational capacity assessment of TI Cambodia was undertaken with support from TI Secretariat. The Organisational Capacity Assessment Tool (OCAT) was used to score the organisation on various aspects of its operational capacity, and identify strengths and areas for improvement. Out of a maximum of 4, TI Cambodia scored 2.9 for the overall assessment. This means that the organisation’s capacities were, on average, deemed more than moderately developed, but just slightly less than well-developed as perceived by staff and the board.

The strongest capacities identified were staffing and volunteer resources, financial reporting, relationship with donors, strategy, board ethics, executive leadership, and the organisation's independence of executive officer/director, while limited board involvement in fundraising, weak internal coordination, and communications, funding model, transparency, database and reporting system, and relationship with the state were identified as the weakest capacities.

Guidelines for Sub-Project management have been developed and are applied. Apart from a general assessment and an assessment of the proposal, potential partners are assessed on their programmes, the financial, administrative and human resource management. A committee exists within TIC to undertake the selection of the proposal. After selection, detailed cooperation agreements are developed listing the reporting and financial responsibilities of the sub-grantee and the activities, outputs and outcomes expected. During implementation, on-going monitoring is undertaken by TIC through both review of reports and monitoring visits. Every quarter, reviews of the financial management system of the partner organisation are also undertaken.

The KPMG Grant Assessment 2012 made 5 recommendations related to Organisational Structure and Management System and 6 related to Financial Management and Control System of TI Cambodia. An Action Plan to act upon them was developed with a timeframe to implement the recommendation, expected results and persons-in-charge of overseeing implementation listed. This MTR, not being an audit, can only report on the progress made on the 5 recommendations to do with organisational structure and management systems:

KPMG Recommendation	Observation of MTR
<p>1: Develop Logframe and Annual Plan that includes specific goals, objectives and performance indicator</p>	<p>This has been done. In fact, activities, outputs and expected outcomes are also specified in concept notes for key activities and cooperation agreements with sub-grantees. The logframe should be reviewed by TIC annually and should be updated to reflect new priorities and the changed Cambodian context.</p>
<p>2: Recruit Director of Program, Finance Manager, HR & Admin Manager, Director of Operations, Communications Advisor, M&E Officer, Program Managers, Program Officers and Project Assistants, etc.</p>	<p>This has been done. The incumbents are of high quality, as witnessed both the MTR, the quality of reports and from feedback provided by other organisations. The post of Programme Manager for Goal 1: Research and Advocacy Programme has now fallen vacant, and there are no plans for a full-time replacement as the organisation states that the Programme is being scaled down. The outputs of the Programme are ready or nearly ready i.e. the findings of NISA and YIS. The</p>

	<p>other Goals will now feed these outputs into their programming.</p>
<p>3: Develop Monitoring Tool to track and report program implementations and results</p>	<p>Tracking is undertaken. Achievements are reported against targets, but the system needs to be IT-based.</p>
<p>4: Develop Fund Raising Strategy</p>	<p>A Fund Raising Strategy has been developed but is not of satisfactory quality. Specifically, how other development partners operating both in Cambodia and beyond will be engaged is not elaborated. TIC has advertised for a strategy development advisor who, it is hoped, will assist in strengthening the Fund Raising Strategy.</p>
<p>5: Set up Internal Audit Function</p>	<p>As with the recommendations on the 6 Financial Management and Control System recommendations, progress on this is better reviewed by a qualified auditor.</p>

4 Conclusions

Despite its young age, the growth and achievements of TI Cambodia are impressive. The conclusions presented below are the key observations noted by the MTR. More detailed comments, by component, are presented in Annex E.

4.1 RELEVANCE

Corruption continues to be perceived as a major issue in Cambodia by its citizens, civil society, media and private sector; and by the outside world too. According to Transparency International's Corruption Perception Index 2013, the country was ranked as 160th out of the 177 countries included in the survey. The same survey ranked the country's budget openness as virtually non-existent.⁷ The Asian Development Bank has similarly found that corruption continues to be the "main area of concern for improving the business environment and overall governance in Cambodia."⁸ The UN Special Rapporteur on Human Rights in Cambodia recently stated that corruption is widespread at all levels in the judiciary. Judges rely on patronage and political protection for job security, compromising their independence. A recent United States government review of the investment climate in Cambodia echoed concerns about corruption within the judiciary, saying, "Business people, both local and foreign, have identified corruption, particularly within the judiciary, as the single greatest deterrent to investment in Cambodia."⁹

The support is in line with the *Australia – Cambodia Joint Program Strategy 2010–2015* which states that cross-cutting issues of focus include tackling corruption. In this regard, it states that Australia "will support reforms in law and justice that gradually make corrupt practices less attractive and more difficult". It is also in line with Sweden's *Strategy for Development Cooperation with Cambodia* in which it is stated that "Measures to fight corruption will form part of all Swedish activities".

Transparency International Cambodia's research on national integrity systems and youth perceptions/attitudes is highly relevant. Before these surveys were undertaken, no comprehensive, up-to-date baseline existed on either the extent of corruption in

⁷ <http://www.transparency.org/country#KHM>

⁸ Asian Development Bank. (2012) *Cambodia: Country Governance Risk assessment and Risk Management Plan*. p.20

⁹ <http://www.state.gov/e/eb/rls/othr/ics/2013/204614.htm>

national institutions or the perceptions of youth towards corruption and their experiences of it. Such diagnostics and baselines are part of TI's work in most chapters since TI's programmes require that they are built on solid data and a profound understanding of the corruption challenges in the country. This will help TIC to better target its programming in the years to come. The NISA report is particularly relevant as it will also reach a large audience and can be used for advocacy purposes and put TIC in a leading position to fight corruption.

Transparency International's engagement in elections was relevant - as the elections dominated the national governance agenda in 2013-14. In the International Republican Institute's (IRI) latest survey of Cambodian public opinion conducted in late 2013 after the polls, 43% of respondents felt the country was headed in the wrong direction. The most significant reasons given for the way that they felt was because of corruption (30%) and nepotism (18%).¹⁰

TI Cambodia's focus on the youth was also appropriate. Almost two thirds of the population (65%) is under the age of 30.¹¹ Being a dynamic segment of the population, with increased awareness and greater access to social media, the Cambodian youth is a suitable vehicle for TI Cambodia to promote its efforts in the country.

4.2 EFFICIENCY

Positive examples of efficiency found in the MTR relate largely to TIC's ability to find synergies with like-minded organisations and identify entry points with significant leverage for change. Instead of creating parallel structures in the country, TI Cambodia has made use of the existing civil society organisations and their networks to promote its agenda. As discussed in the previous chapter, many of these CSOs have existed in the country for a decade or more, and have built up experience in the field of human rights and other social development issues. TI Cambodia has efficiently grafted on to their existing systems, and their outreach on the ground and within government to create awareness of corruption related issues. In a number of cases, it has provided grants to CSOs to carry out specific activities related to anti-corruption. Thus, while remaining a modest organisation in terms of manpower itself, TIC has been able to have significant outreach. It signed developed agreements or MoUs with a number of CSOs and with the Anti-Corruption Unit through which it promoted its agenda building on the strengths of the partner organisation. Thus in the case of CSSP, it expanded its influence within sub-national levels of government. Through CISA, it was able to reach local level communes. The leadership of TIC has

¹⁰ <http://www.iri.org/news-events-press-center/news/iri-cambodia-survey-declining-optimism-country's-direction-strong-sup>

¹¹ <http://www.kh.undp.org/content/cambodia/en/home/countryinfo/>

positioned the organisation well with civil society where it engages in high-level influencing work, good research, good partnerships and relationships.

Similarly, TI Cambodia made use of existing media outlets namely Cambodian Centre for Independent Media and Women's Media Centre of Cambodia. Both these independent media houses have already been promoting good governance and social development issues through their programmes. TI Cambodia was able to use them to further push anti-corruption in public debate, reaching out to potentially millions of listeners. The CCIM uses a variety of tools, such as social media, in addition to its radio station, to promote awareness on social issues including corruption.

TI Cambodia has used previous attendees of youth camps for subsequent trainings and for cascading trainings to other youth in their districts. This has the potential to be increased in the future as well as reinforce individual efforts through encouraging networking amongst previous attendees of the camps.

Currently, the ALAC is not demonstrating value for money. There are two full-time staff and one intern manning the centre, however the number of calls received that relate to corruption is low. The number of relevant calls, i.e., those where callers contact the centre for actual cases is even lower. However, ALAC also engages in providing legal training on the Anti-Corruption Law and its own functions to NGOs activists, youth, young journalists, *tuk tuk* drivers, students and others.

There are a number of areas in which goals 2 and 3 could coordinate better with one another but appear not be doing so. Promotion of ALAC activities (part of goal 3), for example, could be undertaken by the partner CSOs with which component 2 cooperates. The youth engaged under goal 3 could also be better utilised in activities that CISA undertakes, for example, under goal 2. Weak internal coordination was an area which was also highlighted by TIC itself during its OCAT exercise in June 2014.

Another area which the OCAT exercise highlighted was the database and reporting system. This is deemed as weak and the MTR agrees with this assessment.

4.3 EFFECTIVENESS

All partners it has worked with rate TI Cambodia as extremely professional and thorough. Even the ACU, which has developed some differences with TI Cambodia's senior management, acknowledges the professionalism exhibited by the staff. TI Cambodia is also considered to have an independent outlook in its work.

Planned activities have been carried out more or less on schedule. There have been some delays and cancellations, as described in Annex E, but these have not had any major impact.

The three youth camps so far organised have allowed 250 young men and women from across the country to learn about corruption and what can be done against it. The youth had to follow a structured selection process. The camps have fostered informal networking amongst the youth who were able to learn from experts in a fun environment. The projects prepared during the camps and then executed after them have enabled the participants to practically apply the knowledge gained and witness the results of their efforts.

Forty-one youth journalists have benefitted from training in corruption issues and how to investigate and report objectively and factually. They have applied their knowledge through the production of video and radio spots though these have not been nationally aired, thus reducing their effectiveness.

In September 2014, TI Cambodia launched the final report of the National Integrity Systems Assessment in Phnom Penh. The Assessment has comprehensively reviewed 13 pillars of Cambodia's governance system. The process of developing the report was a very consultative one in which nearly all major stakeholders in Cambodia were interviewed and a wide-ranging review of existing reports and documentation was undertaken. It is still to be seen how the report will be more widely used. However, already TI Cambodia has formulated policy recommendations for reforming the judiciary, amendment of the anti-corruption law, passing of a law on access to information and reform of the public sector.

The Youth Integrity Survey whose findings will be published early 2015 will be the first comprehensive survey of youth in Cambodia and their attitudes to, and experiences of, corruption. Like the NISA, it remains to be seen how it will be used for programming and advocacy purposes.

Both NISA and YIS enable TIC to advocate for reforms based on the evidence gathered. The findings of these reports will permit TIC to target specific issues and engage with responsible stakeholders. It will also help TIC to focus on the key corruption challenges and adapt its programming accordingly, including seeking support for its work.

A number of members of the NISA Advisory Group participated actively in discussion to provide feedback on priority key recommendations, pillar findings and scores. However, in both the NISA and YIS Advisory Groups, not all members actively participated.

The focus on gender could be improved. There are many activities in which the involvement of females has been extremely satisfactory, for example the commune level trainings carried out by CISA. However, in other activities participation has been less satisfactory, for instance in the training of journalists. TIC does promote gender equality within the organisation. The MTR has not come across any analysis on gender and corruption/ inequality carried out by TIC.

TI Cambodia provided vital monitoring of the general elections of July 2013 with support of National Democratic Institute. The NDI described TI Cambodia's work as very professional. The work resulted in highlighting election irregularities and greater awareness on corruption in the electoral process. TIC today plays a key role in the Electoral Reform Alliance which advocates for changes in the electoral process.

The relationship with the government's main anti-corruption body, the Anti-Corruption Unit (ACU) had deteriorated over time. Even though, an MoU was signed with it in 2012, the ACU today views TIC with a degree of distrust. This has meant that some planned joint activities do not take place. At the same time, civil society organisations including TIC express dissatisfaction with the performance of the ACU.

The deterioration in relationship with the ACU has had an effect on the submission of cases by TIC to the latter. After submitting 2 cases to the Unit for action, TI Cambodia has ceased forwarding any more cases to it.

The ALAC has had limited success in its work if that is to be measured by how many cases it has been successfully able to assist. Till August 2014, the Centre had entertained 200 queries of which a third, i.e. 66, related to corruption. While advice and guidance has been offered to complainants regarding their cases, there is no report of any case being successfully resolved. A significant factor contributing to this poor performance is the lack of action and follow-up by ACU on complaints it receives. The lack of evidence also hampers complainants in their pursuit of redressal.

TI Cambodia possesses limited capacities in working with the private sector on business integrity issues and in introducing tools which companies would find attractive. Cambodian companies particularly find little incentive in striving to make their businesses corruption-free in an environment where paying bribes to get approvals or permits is seen as the norm. Work on the side of business integrity has thus enjoyed limited success. Until now, only one company, PACTICS, can be said to have been engaged in any substantial manner. Another company, the US-based URS Corporation sees no benefit from engaging with TI Cambodia, citing TIC's lack of expertise in this area.

4.4 IMPACT

Given the short length of time it has been operational, it is not realistic to expect TIC to have made any significant dents in corruption in the country. That will take a longer period of time and effort. However, intermediate outcomes are already emerging. TI Cambodia has been a major contributor to raising understanding and awareness of corruption through public forums, youth camps, journalists training, radio programmes and other activities. TI Cambodia's work in the limited time it has been operational appears to have good potential for achieving significant results. The respondents that have been met during the mid-term review confirm this. Figures for

the anti-corruption show on CCIM make clear that it is the most of popular of the radio station's shows.

The meetings with youth groups confirm that there is a greater realisation amongst them that corruption is harmful for the country. Many attendees of the youth camps did face initial resistance from their local authorities when they tried to implement the projects, they had developed during the youth camps, on promoting dialogue on public service delivery.

TI Cambodia has successfully forged alliances with like-minded organisations, developing synergies and enhancing the impact of its work. It has worked effectively with all manner of CSOs and CSO networks. It has worked with CSOs working at the policy level, those working at the grassroots level, CSOs engaged with government and those working on civil society strengthening. All its partners have demonstrated commitment towards issues of governance, human rights and corruption. TIC has carefully selected the partners it works with ensuring that the partnership does not undermine its neutrality and professionalism.

Rural networks of youth have created and public forums held. Sporadic cases of success in publishing of service delivery fees and giving of receipts, improved teacher attendance etc. have also been cited, though this has not occurred at a significant level.

Through the national conference TIC organised, it contributed to MoEYS taking steps to stop illegal selling of textbooks. A Working Group created by the Ministry is currently looking at this issue.

4.5 SUSTAINABILITY

International development partners continue to remain the main source of financial support for the organisation. Through their aid programmes, Australia and Sweden have provided valuable support to TI Cambodia. Both have been instrumental in its organisational growth and strategic development. At the same time, both have refrained from micro-managing a well-run organisation. There currently exist limited opportunities for the organisation to generate revenue from membership fees, business integrity projects or other sources. This is partly due to the young age of the organisation. It should also be noted that it is unrealistic for a rights body such as TIC to be sustained without donor support.

Technical capacity continues to be built through both exposure of the staff in its work, and on-the-job trainings. TIC has benefitted from technical support of other chapters and the TI Secretariat.

Organisational systems continue to develop and it appears that all of the KPMG recommendations have been implemented. There are today written guidelines and procedures to ensure the organisation runs efficiently and transparently.

For TI Cambodia to become a fully accredited chapter, the TI Secretariat requires it to become a member-based organisation. This is a status TIC is intending to move towards. In the future, TIC could use members for fundraising though it is unlikely that the sums will be high. Youth members could also be engaged in monitoring projects such as exams and elections. Being membership-based will enable TIC to become more embedded within the country and its constituents thereby strengthening synergies with broader societal processes and its legitimacy.

5 Recommendations

5.1 STRATEGIC

- The NISA provides the basis for TI Cambodia to further pursue work on reforms in the judiciary, amendments of the anti-corruption laws including whistle-blowing and complaint handling procedures, and introduction of a law on access to information. TI Cambodia's focus on these three areas is endorsed.
- The focus of ALAC work needs to be reconsidered. Given the low success in tackling individual corruption cases compared to the skills that the Centre's experts possess, ALAC would be more effective if it focussed on enhancing awareness amongst citizens and accumulating evidence to support high-profile cases should they be pursued such as land-grabbing or illegal public service payments. The work of ALAC should also be widened to include more local NGOs and the rural areas. Its engagement with the radio stations should be continued.
- The next phase of TI Cambodia's work should see a sharpening of its focus on specific topics/sectors which beset Cambodia such as land grabbing, the cost of receiving public services, public service delivery in health and education, and electoral reforms. TI Cambodia should get deeper engaged in sector specific issues, moving on from general awareness raising.
- TI Cambodia is now in a position to forge stronger relationships with sub-national NGOs to broaden coverage across the country. This should be undertaken using its tested methodology of working through organisations representing CSO networks.
- The business integrity programme should be reoriented. The focus on perceiving it as a possible revenue-generating channel, through offering services related to business integrity issues and promotion of business integrity tools, should be changed. The potential for this does not exist currently, but may increase in later years as TIC build its experience and capacities. The attention currently should be on building up a supportive constituency amongst the private sector as the organisation has done with the youth, the journalist community and CSOs.

5.2 TARGET GROUPS

- TI Cambodia needs to continue engagement with the young journalists and youth leaders who have benefitted from trainings organised by it. TI Cambodia should foster the development of formal networks of youth and journalists through supporting them to come together on a regular basis, and develop an association(s) with a formal structure. TIC should fund this initiative initially.

Over time, these associations should be encouraged to function more independently while pursuing the agenda of TI.

- The more dynamic youth leaders should be used as facilitators in future camps, for working with bodies like CISA and for citizen's reporting by both TIC and media partners such as CCIM.
- Radio programmes should be made more sector specific with greater reporting from the field. CCIM can make arrangements with local broadcasters in those provinces where it is not represented.

5.3 ORGANISATIONAL

- The development of a second tier of strong leadership should be further encouraged so that it can take over the role of executive directorship when that eventuality occurs. This includes the second tier management representing the organisation more in external forums and building its abilities in strategic thinking.
- TI Cambodia should continue its move to becoming a member-based organisation. Its constituency should include private individuals including the youth, CSOs and the private sector. However, initially charging fees (beyond symbolic amounts) for the foreseeable future would be premature and a disincentive to join.
- TIC should further explore strengthening synergies amongst its various goals. Goals 2 and 3 particularly need to explore how they can exploit each other's target groups and build on one another's successes.
- Information technology should have a greater role in the operation of the monitoring and evaluation system and the various databases (of e.g. activists or youth). This has been identified as an area of weakness by TIC itself during the OCAT exercise of June 2014. This will enhance the system of reporting, monitoring and evaluation, and provide more efficient access to information in-house.
- A qualified auditor should be asked to assess the progress made by TIC on the six recommendations made by the KPMG assessment related to TIC's Financial Management and Control System and also the effectiveness of its Internal Audit Function. As the organisation is externally audited annually, those auditors would be better placed than this MTR to assess the robustness of the financial systems in place.

5.4 WORKING WITH GOVERNMENT

- TI Cambodia should work with the National Assembly's 10th Commission including providing support for its staff, development of the 10th Commission's strategy, and highlighting priorities based on evidence if it is approached.

- TI Cambodia should routinely identify and opportunistically engage with reform-minded individuals within government bodies who display an active interest in anti-corruption issues and reform. This means broadening engagement with government agencies beyond those it is currently working with.

5.5 DEVELOPMENT PARTNERS

- TIC needs to reach out to other donors; emphasising preference for pooled funding. Simultaneously it should resist the temptation to be swayed away from its focus areas or agenda by development partners offering projects with differing priority sectors, unless strategic opportunities exist to pursue them.
- Sweden and Australia are respected Development Partners amongst the donor community and well placed to encourage others (European and others) to support TIC. Both development partners should actively promote the development of relationships between TIC and like-minded Development Partners.
- TIC should invest time in informing Development Partners such as USAID or World Bank of TIC's work, even if limited opportunities for partnering exist. This promotes diffusion of the knowledge of TI Cambodia's work and possible collaboration with them or their networks.
- The Swedish embassy should continue to urge the Cambodian government to take the necessary reforms in its legal framework which would enhance human rights. These include, but are not limited to, amendments to the Anti-Corruption Law article 20 regarding whistle-blowing, introduction of a law on access to information, on complaint handling procures and the proposed law on NGOs.

5.6 DEMONSTRATING IMPACT

- TIC needs to provide greater evidence that it is changing attitudes to corruption in the country, amongst the media and CSOs. So far, such evidence is anecdotal. Evaluation methods and tools to gauge attitudinal and behavioural change should be tested and applied so that TIC can develop a body of evidence that its work is indeed having tangible results beyond awareness raising.

ANNEXES

ANNEX A: TERMS OF REFERENCE

Terms of Reference for the Mid-Term Review of Sweden's support to Transparency International Cambodia (TI Cambodia)

1. Background

Transparency International (TI) is a global civil society organisation leading the fight against corruption. Through its global network, Transparency International brings together more than 100 national civil society organisations who share a common vision for change: a world in which government, politics, business, civil society and the daily lives of people are free of corruption.

Transparency International Cambodia (TI Cambodia) was accredited to the TI Movement as a 'Chapter in Formation' in June 2013. Officially established in July 2010, the organisation currently employs 35 staff, both Cambodian and expatriate. The *mission* of TI Cambodia is to work together with individuals and institutions at all levels to promote integrity and reduce corruption in Cambodia through the following areas:

1. Promote individual and institutional best practices and integrity in their day-to-day performance through education and sharing of good models and examples.
2. Empower community members to actively engage in monitoring development process at national and sub-national levels.
3. Advocate for positive changes toward a corruption free society.

A Board of Directors, with an Executive Director overseeing a senior management team of 7 staff, leads the Chapter.

To guide TI Cambodia mission, a three year Strategic Program *Together Against Corruption 2012-2015* has been developed. Sweden provides core support to TI Cambodia to support the implementation of the Strategic Program 2012-2015, including the establishment of the institution and the cooperation with stakeholders in anti-corruption. The cooperation with stakeholders includes the government, civil society, the private sector and the research community. The objective of the Swedish support is to support TI Cambodia's implementation of the four priority goals of the Strategic Program:

- To diagnose corruption issues and use findings as a reference to stimulate more informed debates and to formulate more projects on anti-corruption;

- To build and support partnership and coalition of civil society organisations to fight corruption more effectively;
- To engage citizens and the youth in promoting integrity more actively; and
- To build governance foundations and operational structures and processes for the establishment of the TI National Chapter in Cambodia.

Sweden's current core support to TI Cambodia is based on an Agreement between the Embassy of Sweden and TI Cambodia and amounts to SEK 10 500 000 for the period 2012-2015. The Agreement stipulates that a Mid-Term Review (MTR) shall be carried out.

A review of TI Cambodia's internal operational, financial management and procurement control system ("Grant Assessment") was made in 2012.

2. Purpose of the Mid-Term Review

The purpose of the MTR is to assess the performance of TI Cambodia against the TI Cambodia Strategic Program Document 2012-2015 and associated Result Framework, to make conclusions and recommendations for the remaining period of the Strategic Program and for a Strategic Program after 2015.

3. Tasks and scope of the assignment

The evaluation questions follow the structure of the DAC criteria for evaluations of development assistance:

Relevance

- Assess if the current choices of approaches and activities are relevant and strategic for the achievement of the objectives.

Effectiveness

- Assess to what extent planned activities have been implemented and to what extent these contribute to stated objectives (qualitatively and quantitatively) in the Strategic Program 2012-2015. Analyse major deviations from plans and objectives.
- Assess the main risks that might prevent the achievement of the objectives and how these risks can be mitigated.
- Assess the implementation of the recommendations from the KPMG Grant Assessment 2012, including processes and policies for allocating funds to other implementing partners.

Impact

- Assess to what extent TI Cambodia is likely to achieve the stated objectives at the end of 2015.
- Assess the quality of TI Cambodia's relations with relevant actors, such as government institutions, private sector, civil society and media.

- To what extent does the intervention contribute to capacity development and strengthening of TI Cambodia and its cooperating partners? What do beneficiaries and other stakeholders perceive to be the effects of the intervention on themselves?
- Consider the intervention in relation to national policies and strategies.

Sustainability

- Assess the present situation regarding the sustainability and options for ensuring sustainable capacity and financing for TI Cambodia.
- Assess to what extent TI Cambodia's work is supported by local institutions and integrated with local social and cultural conditions.
- Assess the extent of ownership within local partners of TI Cambodia and their constituencies in promoting integrity and the fight against corruption.

Others

Based on the above;

- Make recommendations regarding priority actions for the remaining period of the current Strategic Program implementation.
- Make recommendations regarding a Strategic Program after 2015.

4. Methodology

The consultants shall carry out the assignment by reviewing relevant documentation and by conducting interviews. The following steps of the evaluation are foreseen:

- Initial desk review and inception report
- Review of documents and interviews
- Analysis and report writing

The assignment shall be carried out in either June or August 2014. It is estimated that a total of five weeks are required for the assignment and that at least two weeks of work in Cambodia is needed. The consultants shall propose a plan on how the team will structure its work and which methods that will be used. It is suggested that they apply the DAC criteria for evaluating development assistance, in accordance with the evaluation questions outlined above.

Relevant documentation includes:

- Key Cambodian policy documents including the Rectangular Strategy 2014-2018
- TI Cambodia's Program Proposal "Together Against Corruption 2012-2015"
- Results Assessment Framework
- Monitoring and Evaluation Framework
- TI Cambodia's Fund Raising Strategy
- Web based material produced by TI Cambodia
- Annual Work Plans and Budgets
- Annual Progress and Financial Reports
- Annual Audit reports

- KPMG Grant Assessment 2012 and action plan to implement the recommendations
- Minutes from Annual Review Meetings
- Agreement Sweden-TI Cambodia
- The Swedish Cooperation Strategy for Cambodia 2012-2013
- Embassy of Sweden Contribution Management Documents, including Assessment Memo

Interviews should include:

TIC management and staff, including Preap Kol, Executive Director, Sun Long, Director of Operations and Pech Pisey, Director of Programs. TI Cambodia's Board of Directors, relevant stakeholders including representatives of Cambodian government, private sector, civil society, and development partners.

5. Qualifications of the consultant(s)

Relevant academic education (i.e. minimum Bachelor degree or equivalent).

Competence and experience in

- Evaluation and result-based management of development cooperation projects
- Institutional and organisational development
- Anti-corruption and political economy
- At least five years of experience of similar assignments

Experience from working in Cambodia or South-East Asia is an asset.

6. Work Plan and Reporting

The MTR shall be undertaken in either June or August 2014. The consultants shall present a preliminary report to TI Cambodia and the Embassy of Sweden and arrange a meeting to present and discuss the preliminary report. The Embassy and TI Cambodia will provide comments on the preliminary report 15 days after the receipt of the report, and the consultants will finalise the report in view of these comments. A final report shall be delivered by August (if the assignment starts in June) or October (if the assignments starts in August) 2014. The report shall be written in English and be analytical, logically structured, contain evidence-based findings, conclusions, lessons-learned and recommendations and have an executive summary.

ANNEX B: INCEPTION REPORT

This document is the Inception Report of the Mid-Term Review of Sweden's support to Transparency International Cambodia (TI Cambodia). It has been prepared by Indevelop at the end of the Inception Phase of the Review which has included a review of documentation forwarded by the Embassy of Sweden in Phnom Penh and discussions with TI Cambodia's Director of Programmes and Transparency International's Regional Coordinator for South East Asia.

The Inception Report will discuss the broad questions identified in the Terms of Reference of the Mid-Term Review and elaborate the specific questions and issues on which information will be sought during the implementation phase. The Report specifies the evaluation methodology which will be used to collect information and the limitations, if any, in that process. It will also discuss the issues and initial findings which have been identified during the Inception Phase.

Transparency International Cambodia was officially established in July 2010 and accredited to the TI Movement as a 'Chapter in Formation' in June 2013. This is an intermediate stage before national chapters acquire a fully accredited status. TI Cambodia works to promote integrity and reduce corruption in Cambodia.

The Government of Sweden has been supporting TI Cambodia since 2012 to implement its three year Strategic Programme *Together Against Corruption 2012-2015*. The objective of the Swedish support is to support TI Cambodia's implementation of the four priority goals of the Strategic Programme:

- To diagnose corruption issues and use findings as a reference to stimulate more informed debates and to formulate more projects on anti-corruption;
- To build and support partnership and coalition of civil society organizations to fight corruption more effectively;
- To engage citizens and the youth in promoting integrity more actively; and
- To build governance foundations and operational structures and processes for the establishment of the TI National Chapter in Cambodia.

Sweden's current core support to TI Cambodia is based on an Agreement between the Embassy of Sweden and TI Cambodia and amounts to SEK 10 500 000 (approx. USD 1.5m) for the period 2012-2015. The current MTR is being carried out following a stipulation in the Agreement that such a review will be undertaken.

The purpose of this review is to assess the performance of TI Cambodia against the TI Cambodia Strategic Programme Document 2012-2015 mentioned above and associated Result Framework, to make conclusions and recommendations for the remaining period of the Strategic Programme and for a Strategic Programme after 2015.

During the Inception Phase, a review of a number of documents related to the Programme were undertaken and these are listed in Annex 1. Following approval of this Inception Report, the field or implementation phase of the Mid-Term Review will commence.

6 Scope of Mid-Term Review

6.1 ELABORATION OF EVALUATION QUESTIONS

Four of the 5 OECD-DAC criteria have been used in the formulation of questions in the Terms of Reference - relevance, effectiveness, impact and sustainability. In the TOR, efficiency has not been included as a criterion to examine. According to the Sida Evaluation Manual 2nd revised edition, the criteria are defined as follows:

Relevance : The extent to which the objectives of a development intervention are consistent with beneficiaries' requirements, country needs, global priorities and partners' and donors' policies.

Effectiveness : The extent to which the development intervention's objectives were achieved, or are expected to be achieved, taking into account their relative importance.

Impact : Positive and negative, primary and secondary longterm effects produced by a development intervention, directly or indirectly, intended or unintended.

Sustainability: The continuation of benefits from a development intervention after major development assistance has been completed. The probability of continued long-term benefits. The resilience to risk of the net benefit flows over time.

In order to have a shared understanding of the questions proposed in the TOR for the mid-term review and ensure that no important issues are overlooked, an elaboration of them is given below describing what the evaluation team understands needs to be assessed. This elaboration has been undertaken following a review of the available documentation.

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
<i>Relevance</i>				
1.	Assess if the current choices of approaches and activities are relevant and strategic for the achievement of the objectives.	<p>Are the four core strategic programmes of Research and Advocacy, Partnership and Coalition Building, Citizen and Youth Engagement, and Governance Foundation and Capacity Building the most appropriate and relevant to the needs of stakeholders in country ? Why were they chosen and not others?</p> <p>Has a strategic analysis been undertaken and theories of change identified for each?</p> <p>To what extent do activities in a strategic area reinforce synergies among strategic areas ?</p>	<p>Semi- structured interviews with all stakeholder in country, including implementing agencies and donors.</p> <p>Documents received</p> <p>Interviews TI Bangladesh and Vietnam.</p>	<p>Within the Research and Advocacy Programme (Goal 1), there are two major surveys to be undertaken: The National Integrity System Assessment (NISA) provides an in-depth analysis of core good governance foundations and an overview of all the principle governance institutions in Cambodia. The Youth Integrity Survey (YIS) is expected to provide comprehensive findings about the perceptions, opinions and experiences of the Cambodian youth with regards to acting with integrity.</p>
<i>Efficiency</i>				
2.		<p>To what extent has TI- C and the Board taken cost effectiveness into account in their decisions about programmes? Are there examples to demonstrate results?</p>	<p>Interviews with TI-C and its Board</p>	

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
		<p>To what extent has the Chapter and Board taken into consideration the investment in capacity and systems (for example ALACs or other programmes) and the expected returns ? Is there a reasonable balance between recurrent costs for the chapter and investment in programmes?</p>		
<i>Effectiveness</i>				
3.	<p>Assess to what extent planned activities have been implemented and to what extent these contribute to stated objectives (qualitatively and quantitatively) in the Strategic Program 2012-2015. Analyze major deviations from plans and objectives.</p>	<p><u>Quantity</u></p> <p>What number of events/activities, by type, have been held or conducted?</p> <p>How many people have directly and indirectly benefitted, by activity or event, disaggregated by sex, age group and whether from within Phnom Penh or outside it? How many CSOs, government agencies and other bodies have been engaged sporadically or systematically? Has this contributed to the creation of partnerships and trust ?</p> <p>What have been the views of the youth who have attended the youth camps?</p> <p>What is the volume of utilisation of the online resource library?</p> <p>How can delays in planned activities or other challenges be explained</p> <p><u>Quality</u></p>	<p>Semi- structured interviews with TI- Cambodia and implementing agencies.</p> <p>Documents and in particular, results frameworks and M&E documents.</p> <p>Minutes of meetings and documents related to the preparation and implementaion of the activities (some of which could be obtained while in country)</p> <p>Focus Group Discussion with those targetted and beneficiaries such as Youth Groups, specific NGOs working with specific groups, including women.</p>	<p>Note this question focuses on outputs and their quality. For results or impacts of the outputs, please see questions in the next section under ‘impact’.</p> <p>Target versus achievement (in terms of numbers) is not given in Strategic Programme Document: Together Against Corruption 2012-2015. However, there are numerical targets in the logframe and M&E Framework both prepared for the Sida Review Meeting of November 2012.</p>

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
		<p>What is the quality of the 13 pillar reports of the National Integrity System so far completed?</p> <p>What is the progress being made on the Youth Integrity Survey (YIS) and what is the quality of the process?</p> <p><u>Gender and Human Rights</u></p> <p>Does TI Cambodia do analysis of gender in its analysis and mainstreaming gender in the 4 components of the strategy ?</p> <p>Does it reflect gender issues and gender equity in its programmes, guidelines & training?</p> <p>Does it monitor gender results in its programmes?</p> <p>Does it conduct specific gender related corruption research and does it monitor the results?</p> <p>Does TI Cambodia target gender equity with their partners ?</p> <p>Does TI Cambodia have specific human rights and non-discrimination policies and are they effective?</p>		They are also given in the Results Framework.
4.	Assess the main risks that might prevent the achievement of the objectives and how these risks can be mitigated.	What are the risks and are they regularly reviewed? Have mitigation strategies been explored?	TI-Cambodia documents including the Security Risk Management Policy and Procedure	Risks identified by TI Cambodia have included shortage of funds for execution of the Youth Integrity Survey.

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
		<p>Is coordination with government agencies such as ACU, MoEYS and Ministry of Justice effective and what are the hurdles?</p> <p>Is there adequate financial control of sub-contracted partners which have been identified as a high risk by Sida? Are the Sub-Grant Management Guidelines prepared by TI Cambodia followed and are they adequate?</p> <p>Are the funds sufficient to carry out the planned activities and what has been undertaken to reduce shortfall ?</p>	Semi-structured interviews with Government, NGO, Media and private sector	Further risks were identified in the Strategic Programme Document Together Against Corruption 2012-2015, in the logframe and M&E Framework of November 2012, and in the Conclusion on Performance TI Cambodia by Sida in 2013.
5.	Assess the implementation of the recommendations from the KPMG Grant Assessment 2012, including processes and policies for allocating funds to other implementing partners.	<p>How has TI Cambodia responded to the recommendations 2 years after they were made?</p> <p>What are the major hurdles in their implementation ?</p> <p>Has the ED and Board dealt with these issues effectively ?</p> <p>Has the recruitment of personnel been concluded ?</p>	Semi structured interviews with TI- Cambodia TI-Cambodia and KPMG documents.	The KPMG Grant Assessment 2012 made 5 recommendations related to Organizational Structure and Management System and 6 related to Financial Management and Control System of TI Cambodia. An Action Plan to act upon them was developed with time-frame to implement the recommendation, expected results and persons-in-charge of overseeing implementation

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
				listed. TI Cambodia will be requested to prepare an update on the stage of progress of each recommendation. This update will be validated by the MTR.
<i>Impact</i>				
6.	Assess to what extent TI Cambodia is likely to achieve the stated objectives at the end of 2015.	To what extent is TIC in a position to achieve these objectives given its human and financial resources ? What are most likely the key bottlenecks that prevent TIC from achieving these objectives ? Can specific actors, policies or other issues be identified ?	Semi structured interviews with all stakeholders and document review. Interview with TI Cambodia and TI-S	This, it is assumed, refers to <i>progress</i> on the 4 goals. See note under issues later in this Inception Report. Given the short duration of the project and the environment it operates in, it is unlikely that any drastic reductions in corruption can be observed. However, attitudes towards corruption may have changed and this will be assessed as will the demand from citizens for the fight against corruption.
7.	Assess the quality of TI Cambodia's relations with relevant actors, such as government institutions,	How actively have stakeholders provided inputs during dissemination of the 13 pillar reports of the National Integrity System? Has the report been shared with Government institutions, including the ACU and has a dialogue on it ensued?		The Partnership and Coalition Building Programme (Goal 2), e.g., aims at building a strong social movement

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
	private sector, civil society and media.	<p>How do other stakeholders perceive TI Cambodia in terms of its responsive to the needs of the country, its efficiency, effectiveness and impact?</p> <p>How effective is the relationship of TI Cambodia with ACU? How strongly do they collaborate and how smoothly is the MoU signed with it being implemented?</p> <p>How can TI Cambodia improve working with government and can it learn from other chapters ?</p> <p>How useful has the National Conference on “Promoting Integrity and Quality of Education” been perceived by stakeholders and attendees?</p> <p>Who are other key NGO, media and private sector partners and to what extent has TIC managed to collaborate and in what areas with what results ?</p> <p>What is TIC’s position as a newcomer in this arena and field ?Has it managed to establish itself as a critical contributor to fight corruption ?</p>		across the nation to collectively take action against corruption.
8.	To what extent does the intervention contribute to capacity development and strengthening of TI Cambodia	<p>How have capacities of TI Cambodia’s staff and management team improved?</p> <p>How capacitated is the Advocacy and Legal Advice Centre (ALAC)?</p>	Semi structured interviews with all stakeholders and document review.	TI Cambodia works with the Anti-Corruption Unit (ACU), providing both financial and technical support

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
	<p>and its cooperating partners? What do beneficiaries and other stakeholders perceive to be the effects of the intervention on themselves?</p>	<p>How has the grant given to Coalition for Integrity and Social Accountability (CISA) strengthened social accountability at grassroots level?</p> <p>How has the Training on Transparency and Social Accountability conducted by CISA affected the participants ? What examples exist to demonstrate effects of such training ?</p> <p>How have the grants provided to the media partners, the Cambodian Centre for Independent Media (CCIM) and the Women's Media Centre (WMC) been utilised? What has been the result of those activities ?</p> <p>What do partners such as Election Reform Alliance (ERA), Cooperation Committee for Cambodia and Cambodian Human Rights Action Committee, and private companies under the Business Integrity Programme (such as Pactics and URS Australia) perceive of the relationship they have with TI Cambodia?</p> <p>What is the quality of the relationship TI Cambodia has with the Access to Information (A2I) working group with which it works to advocate for the adoption of the Law on Access to Information?</p> <p>How satisfactory is the level of coordination of ALAC with CSOs and the ACU?</p>	<p>Interviews with TI-Cambodia and implementing partners, including NGOs, trainers and beneficiaries such as Media and Women groups, specific action or working groups and the private sector (Chamber of Commerce or other appropriate entity).</p> <p>ALAC staff to obtain data.</p> <p>TI-S capacity development report (expected June 2014)</p>	<p>to realize the ACU's goals on education and prevention of corruption.</p>

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
		<p>What are the perceptions of youth regarding the Integrity Pledge?</p> <p>Those youth who were given grants after attending camps and engaged in youth-to-youth initiatives - what resulted from those?</p> <p>Similarly, where there any effects or outcomes from the seed grants provided to journalists?</p> <p>Has the ALAC been able to fulfil its purpose? How many people has it benefitted and how?</p> <p>To what extent can TI Cambodia apply best practices from TI and its chapters in the region based on past cooperation.</p>		
9.	Consider the intervention in relation to national policies and strategies.	<p>How will the NIS contribute to the effective implementation of the Anti-Corruption and Governance Reform stated in the Rectangular Strategy Phase III of the Royal Government of Cambodia?</p> <p>How has the ALAC contributed to the enforcement of the anti-corruption law?</p> <p>To what extent have the recommendations and findings of the National Conference on “Promoting Integrity and Quality of Education” been considered by the Ministry of Education, Youths and Sports</p>	<p>Semi structured interviews with government, specific Ministries (education, sports) and ACU.</p> <p>TI Cambodia documents</p>	<p>The Rectangular Strategy Phase III places good governance and anti-corruption at the core of the reform agenda. The adoption of the Anti-Corruption Law and the creation of the Anti-Corruption Unit (ACU) and amendment to ensure the ACU's financial independence have been undertaken by the government.</p>

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
		(MoEYS)? What has been the effect of the uptake of the recommendations and findings?		
<i>Sustainability</i>				
10.	Assess the present situation regarding the sustainability and options for ensuring sustainable capacity and financing for TI Cambodia.	<p>To what extent have the ideas identified in the Funding Strategy been implemented upon? Is the private sector, e.g., being engaged for fundraising?</p> <p>At what stage is the development of the strategic proposal for the period from 2015-2020?</p> <p>Has the Funding Strategy been further elaborated?</p> <p>Is there an inclination amongst other donors to fund TI? Has Sweden taken steps to encourage other donors to co-finance TIC's activities?</p> <p>What strategies will be deployed to further improve the capacities of TI Cambodia's staff and management team?</p> <p>What capacity building support is received from TI Secretariat and is it adequate?</p> <p>How close is TI Cambodia to becoming a TI National Chapter?</p> <p>Are internal management and financial processes and policies in place in TI Cambodia?</p> <p>Have co-funding options been explored with other in country entities, including regional efforts ?</p>	<p>Semi-structured interviews with TI- Cambodia; donors.</p> <p>TI- S, including data from their upcoming capacity assessment.</p> <p>TI- Cambodia documents and plans. Results frameworks.</p>	<p>The version of the Funding Strategy provided to the MTR is incomplete as it does not describe any strategy or tools which will be implemented to secure funding beyond Sida and DFAT.</p> <p>There is also currently no dedicated donor group in Cambodia focussing on corruption issues.</p>

Q.No.	Evaluation Question as given in the TOR	Sub-questions	Sources and where the data will be found	Issues/comments
11.	Assess to what extent TI Cambodia's work is supported by local institutions and integrated with local social and cultural conditions.	<p>Are strategic initiatives and recommendations being developed in collaboration with local institutions as mentioned in the Funding Strategy?</p> <p>To what extent is TIC taking local and social cultural conditions into account and in particular in its activities in the Provinces.</p>	<p>Semi- structured interviews with TI Cambodia and partners, including implementing agencies.</p> <p>FGD in the provinces.</p>	
12.	Assess the extent of ownership within local partners of TI Cambodia and their constituencies in promoting integrity and the fight against corruption.	<p>What examples exist to demonstrate that TIC has created a sense of ownership in other entities ?</p>	<p>Semi- structured interviews with TI's partners, including implementing agencies and government.</p>	

6.2 LIMITATIONS

The sub-question detailed above are an exhaustive list and it may be likely that evidence-based answers cannot be found to all of them. During discussions with the Embassy and TI Cambodia, a consensus will need to be reached as to which sub-questions should be explored as a priority. During the Inception Phase, discussions have already been initiated with TI Cambodia regarding the tentative schedule of visits and the stakeholders to be interviewed. This schedule will be finalised before the in-country visits and will determine the extent to which the different sub-questions can be explored. It is not expected that all the issues above will be explored in detail.

7 Proposed Approach and Methodology

7.1 TOOLS: KEY INFORMANT INTERVIEWS AND FOCUS GROUP DISCUSSIONS

The implementation of the MTR will commence with a briefing meeting with the Programme Officer at the Embassy of Sweden and the Executive Director of TI Cambodia in Phnom Penh. TI Cambodia will draw up and finalise meetings with relevant stakeholders and key informants. The list of organisations and individuals to be interviewed includes the following. During approval of the Inception Report, this list will be finalised after feedback from the Embassy and TI Cambodia:

1. TI Cambodia's BoD, management and staff
2. Staff of TI Cambodia's Advocacy and Legal Advice Centre (ALAC)
3. Representatives of key Cambodian government departments and agencies including the National Anti-Corruption Council (NACC) and the Anti-Corruption Unit (ACU), Ministry of Education, Youth and Sports (MOEYS), the Ministry of Justice (MoJ), the Ministry of Interior (MoI) and other relevant ministries.
4. Parliamentarians.
5. The private sector including businesses and associations TI Cambodia works with on business integrity issues including various chambers of commerce, PACTIS and URS Australia.
6. Civil society including journalists and youth leaders that TI Cambodia engages with, Cambodian Human Rights Action Committee (CHRAC), Cooperation Committee for Cambodia (CCC), the NGO forum, Committee for Free and Fair Elections (Comfrel), Cambodian Center for Human Rights (CCHR), the Khmer Institute for National Development (KIND), Coalition for Integrity and Social Accountability (CISA), Advocacy and Policy Institute (API), Cambodian Centre for Independent Media (CCIM) and the Women's Media Centre (WMC) amongst others
7. Development partners including DFAT (Government of Australia), EWMI-PRAJ, USAID & the World Bank. Other international development agencies that have a focus on corruption issues could include the Asian Development

Bank, UNODC (which has the UNCAC mandate), UNICEF, UNESCO and UNDP (which work in key sectors).

8. Focus group discussions with participants of various TI Cambodia's organised events or groups e.g. Innovative Project, youth camps, writing competitions and trainings, and the NIS and YIS Advisory Groups.

A review of TI Cambodia's documents previously not available remotely will also be undertaken. Face-to-face meetings will be held with stakeholders from outside Phnom Penh. If that is not possible due to time limitations, those meetings will be replaced with telephone or Skype-based interviews. Throughout this period, regular feedback will be sought from TI Cambodia and the Embassy of Sweden on emerging findings.

The team has also consulted TI-S and spoke with Samantha Grant, Regional Coordinator for Asia Pacific, to learn more about TI-S support before the Sida grant was obtained. Given that TI Cambodia has benefitted from other chapters in the region such as Bangladesh and Vietnam, the team will contact those to collect additional data.

7.2 ANALYSIS AND REPORT WRITING

The analysis and drafting phase will include the following tasks:

1. Analysis of the collected data and presentation of preliminary findings to the Embassy of Sweden and TI Cambodia on the last day of the in-country part of the assignment;
2. Drafting of the evaluation report;
3. Submission of the draft report to the Embassy of Sweden and TI Cambodia;
4. Incorporation of comments and writing of the final Report; and
5. Submission of the final report.

7.3 MILESTONES AND DELIVERABLES

The field phase of the MTR is expected to last around two and a half weeks commencing in the first week of August. A detailed workplan is provided in Annex 2 and the key milestones and deliverables are listed below:

- Start of the inception work: early June 2014
- **Submission of the Inception Report:** 11 June 2014
- Feedback/approval of Inception Report: 23 June 2014
- In-country mission: 6 - 22 August 2014
- Discussion with Embassy of Sweden and TI Cambodia on preliminary findings: 22 August 2014
- **Submission of the Draft Report:** 9 September 2014
- Written feedback/comments on the Draft Report: 24 September 2014
- **Submission of the Final Report:** 6 October 2014

7.4 OUTLINE OF FINAL REPORT

Based on the format provided for evaluations in the Sida Evaluation Manual (second revised edition), the following report structure will be used.

Structure & Main Contents of MTR Final Report	
Executive Summary	
Introduction	
Background	
Evaluation Methodology	
Key Findings	
	<i>Relevance</i>
	<i>Effectiveness</i>
	<i>Impact</i>
	<i>Sustainability</i>
Conclusions	
Recommendations (for both TI Cambodia and the Embassy):	
	<i>for remaining period of current Strategic Programme implementation</i>
	<i>for a Strategic Programme after 2015</i>
Annexes including:	
	<i>List of persons met</i>
	<i>List of documents reviewed</i>
	<i>Terms of Reference</i>

8 Other Issues

8.1 CHALLENGING CONTEXT

The review of documentation provided by the Embassy shows that TI Cambodia operates in a very challenging environment. A poorly functioning legislative branch, corruption, constant political interference, limited financial resources and inadequate staff training undermine the independence of the judiciary, for example, and prevent it from providing a fair and equitable access to justice to ordinary Cambodians.

One key government partner, the Anti-Corruption Unit still appears to lack autonomy. Its accountability is also limited. The Anti-Corruption Law needs strengthening. Thus, legislatively, corruption and non-accountability have many opportunities. The documentation also highlights that while the Government of Cambodia has prioritised judicial and legal reforms, along with good governance and anti-corruption, capacities to implement these reforms and political will remain uncertain in an environment where corruption has been rampant for decades. Also while there may be a growing voice of critical actors in society, their impact on entrenched corruption cultures may be difficult to judge. The MTR will attempt to

ensure that its conclusions and recommendations reflect this reality while it examines the progress of TI Cambodia in the four priority goals of the Strategic Programme.

8.2 MODEST DURATION TILL NOW OF INITIATIVE

It would be unfair to expect large-scale or profound change to have occurred given the brevity of the time period since TI Cambodia's establishment and the initiation of the Strategic Programme. Too short a time period has elapsed for longer term impact to be visible. Awareness may have risen, partnerships forged and processes initiated but concrete, marked impact will take longer. It must also be noted that the Swedish grant has been used to pay for key recurrent costs, including personnel and that only a limited part of the grant has been used for programming. This affects the evaluability of the programme activities as such. In addition, the activities undertaken in some of the strategic areas are of a diagnostic nature which will provide TIC with important data to target future activities. TI Cambodia has cooperated with other chapters in the region and the team will attempt to interview the representatives of TI Vietnam and Bangladesh to assess how TI Cambodia has benefitted from this cooperation and vice versa.

8.3 TARGETS TO MEASURE QUANTITATIVE ACHIEVEMENTS

Numerical targets e.g. number of people to be trained, number of publications to be produced, number of private sector partners to engage with are not given in Strategic Programme Document: Together Against Corruption 2012-2015. However, there are some quantified targets in the logframe and M&E Framework both prepared for the Sida Review Meeting of November 2012, and also in the Results Framework. This is to say that a comparison of projected targets versus realised achievements, in terms of quantity, will only be possible in certain cases.

ANNEX C: LIST OF PERSONS MET

Transparency International Cambodia (TIC)

Board of Directors

Rath Sophoan, Chairman

Lor Saly, Member

Sopheak Ok Serei, Member

Management and Management Support Team

Kol Preap, Executive Director

Pisey Pech, Director of Programs

Long Sun, Director of Operations

Sopheha Sing, Monitoring & Evaluation Coordinator

Visalh Top, Program Assistant

Communications Team

Maud Salber, Communications Officer

Sophornna Chea, Communications Assistant

Goal 1: Research and Advocacy Team

Elizabeth Anne Johnson, Program Manager

Serey Vicheth Chunly, Program Officer

Goal 2: Partnership and Coalitions Building Team

Raksa Pen, Program Manager

Ratana Chhim, Senior Program Manager

Chanroat, Business Integrity Program Officer

Goal 3: Citizen and Youths Engagement Team

Sovattha Neou, Program Manager

Pichey Ly, Youth Program Officer

Sokhema Nara, Innovative Project Officer

Sambath Hong, Advocacy and Legal Advice Centre (ALAC)

Darapisuor Rath, Legal Assistant, Advocacy and Legal Advice Centre (ALAC)

Goal 4: Governance Foundation and Capacity Building Team

Meng Aun Seang, HR and Admin Manager

Yoem Sreyleak, Office Helper

Embassy of Sweden, Cambodia

Klas Rasmusson, Counsellor - Economist

Australian Government Department of Foreign Affairs and Trade (DFAT)

Shaun Ellmers, First Secretary Development Cooperation

Chhay Ros, Senior Program Manager

United States Agency for International Development (USAID), Cambodia

Rebecca Black, Mission Director

The World Bank, Cambodia

Janelle Plummer, Senior Governance Specialist
 Sokbunthoeun So, Public Sector Specialist
 Enrique Aldaz-Carroll, Senior Country Economist

**United Nations Educational, Scientific and Cultural Organisation (UNESCO),
 Phnom Penh Office**

Anne Lemaistre, Head of Office and UNESCO Representative in Cambodia
 Jamie Lee, Communication and Information Focal Point

**Second Commission on Economy, Finance, Bank & Audit, National Assembly,
 Kingdom of Cambodia**

Cheam Yeap, Chairman
 Ngin Khorn, Member
 Chay Borin, Member
 Ly Kim Leang, Member

Anti-Corruption Unit (ACU)

Om Yentieng, President

Ministry of Education, Youth and Sport (MoEYS)

Nath Bunroeun, Secretary of State

Cambodia National Rescue Party (CNRP)

Yim Sovann, Chief of the Executive Committee, Spokesman

Khmer Institute for National Development (KIND)

Sok Dou, Program Coordinator

Cambodia Human Rights Action Committee (CHRAC)

Suon Bunsak, Executive Secretary/Chief of Secretariat
 Billy Chia-Lung Tai, Human Rights Adviser

International Justice Mission (IJM)

Christa Hayden Sharpe, Director, Cambodia Field Office
 Saroeun Sek, Director of Legal

Cambodian Center for Human Rights (CCHR)

Piseth Duch, Project Coordinator, Trial Monitoring and Business & Human Rights
 Chor Chandyda, Senior Researcher

Cooperation Committee for Cambodia (CCC)

Sotheary El, Head of Program
 Putheary Sin, Head of Communications and Member Development

National Democratic Institute

Laura L. Thornton, Senior Director

Coalition for Integrity and Social Accountability (CISA)

Him Yun, Secretariat Coordinator

Cambodian Civil Society Partnership (CCSP)

Sokhany Prak, Executive Director

Advocacy and Policy Institute (API)

Socheat Lam, Deputy Director

NGO Forum on Cambodia

Mony Pen, Development Issues Program Manager

Kunvibol Kan, National Budget Project Coordinator

Cambodian Center for Independent Media (CCIM)

Camille Bethoux, Projects Director

Say Phalla, Senior Producer

Women's Media Centre of Cambodia (WMC)

Tep Bunthan, Program Manager

Committee for Free and Fair Elections in Cambodia (COMFREL)

Yuthya Soun, Legal Officer

Boeurth Blang, Senior Officer

East West Management Institute (EWMI)

Terry Parnell, Advisor, Program on Rights and Justice

Development Innovations

Great Greathouse, Chief of Party

Marina So, Deputy Chief of Party

Theng Vibol, Partnership Program Manager

PACTICS Cambodia

Jack Van Dokkum, CSR Manager

URS Australia Pty Ltd

John Rennie, Team Leader, Cambodia Community Justice Assistance Partnership

Voice of America (VOA)

Say Mony, Multimedia Journalist

Focus Group Discussions

6 Participants of Journalists Training conducted in 2013 & 2014

8 Participants of Youth Camps

National Integrity System Assessment (NISA) Advisory Group

Kay Kimsong, Editor in Chief, The Phnom Penh Post

Youth Integrity Survey (YIS) Advisory Group

Sith Hong Eang, Acting President, Khmer Youth Association

Kimsong Chea, Social Policy Specialist, UNICEF

Lo Leang, Lecturer, Department of Social Work, Royal University of Phnom Penh

Transparency International Secretariat, Berlin (*Skype call*)

Samantha Grant, Regional Coordinator for South East Asia

Transparency International, Bangladesh (*Skype call*)

Iftekhhar Zaman, Executive Director

ANNEX D: LIST OF DOCUMENTS CONSULTED

National Strategies

- Royal Government of Cambodia (2013). *“Rectangular Strategy” for Growth, Employment, Equity and Efficiency Phase III Of the Royal Government of Cambodia of the Fifth Legislature of the National Assembly*
- Ministry for Foreign Affairs, Sweden (2012). *Strategy for development cooperation with Cambodia January 2012 – December 2013*
- AusAID (2012). *Australia-Cambodia Joint Aid Program Strategy 2010-2015*
- *European Development Cooperation Strategy for Cambodia 2014-2018 (2014)*

TI Cambodia Reports

- Transparency International Cambodia (2014). *Together Against Corruption, Semi-Annual Report, October 2013 - March 2014*
- Transparency International Cambodia (2014). *Together Against Corruption, Semi-Annual Report, October 2012 - March 2013*
- Transparency International Cambodia (2014). *Together Against Corruption, Annual Report, October 2012 - September 2013*
- Transparency International Cambodia. *Programme Proposal 2011-2014. Together Against Corruption (TAC). Strengthening Demand and Participation from Society, Public and Private Sector to fight corruption.*
- Transparency International Cambodia (2012). *TIC Log Frame*. Prepared for Sida Review Meeting.
- Transparency International Cambodia (2012). *Programmes’ Monitoring & Evaluation Framework*. Prepared for Sida Review Meeting.
- Transparency International Cambodia (2012). *Fundraising Strategy*. Prepared for Sida Review Meeting.
- Transparency International Cambodia (2012). *Sub-Grant Management Guideline*. Prepared for Sida Review Meeting.
- Transparency International Cambodia. *Summary Sheet: The Advocacy and Legal Advice Centre (ALAC)*
- Transparency International Cambodia (2012). *Meeting Minutes: Annual Sida Review Meeting*
- Transparency International Cambodia. *Newsletters (3 to date)*
- Transparency International Cambodia (2013). *Youth Integrity Survey (YIS) Advisory Group Kick-off Meeting Report*.
- Transparency International Cambodia (2014). *Meeting Minutes. National Conference: Promoting Integrity to Strengthen the Quality of Education in Cambodia*
- Transparency International Cambodia (2013). *Final Report: Young Professional Journalist Training Year 2012-2013*.
- Transparency International Cambodia (2012). *Final Report: Young Professional Journalist Training Year 2012-2013*.

- Transparency International Cambodia. (2012) *TIC Progressive Report for Donor. April – September 2012. ‘Addressing KPMG Capacity Assessment’s Findings & Recommendations’*
- Transparency International Cambodia. *Sub-Grant Management Guidelines*
- Transparency International Cambodia. (2014) *Corruption and Cambodia’s Governance System. National Integrity System Assessment.*
- Transparency International Cambodia. (2014) *The Advocacy and Legal Advice Centre (ALAC). Data Finding of Clients Contacted to ALAC*

Progress Reports of TIC Grantees

- Coalition for Integrity and Social Accountability. *Progress Reports on ‘Collective Voice Against Corruption Project’ from 1 January 2013 to 30 June 2014.* Submitted to Transparency International Cambodia
- Cambodian Centre for Independent Media. *Progress Reports on ‘Clean Road Project’ from 1 January 2013 to 31 March 2014.* Submitted to Transparency International Cambodia
- Women’s Media Centre of Cambodia. *Progress Reports on ‘The New Generation Project’ from February 2013 to June 2014.* Submitted to Transparency International Cambodia
- Cambodian Civil Society Partnership. *Progress Reports on ‘Training for transparency: Training-the-trainer and commune council workshops on anti-corruption strategies’ from 14 February 2014 to 30 June 2014.* Submitted to Transparency International Cambodia

TIC MoUs and Cooperation Agreements with partners

- Memorandum of Understanding between Anti-Corruption Unit and Transparency International, Cambodia on the Implementation of a Project on “Education and Promotion on Anti-Corruption in Cambodia for 2012-2015”
- Cooperation Agreement between Transparency International Cambodia and Anti-Corruption Unit for ‘Supporting Education and Dissemination of Anti-Corruption Activities 2012-2015’
- Memorandum of Understanding between Transparency International, Cambodia and International Justice Mission (2013)
- Cooperation Agreement between Transparency International Cambodia and Cambodian Centre for Independent Media (CCIM) to Implement Clean Road Project (2013 & 2014)
- Memorandum of Understanding between Cooperation Committee for Cambodia and Transparency International, Cambodia (2013)

Other

- *Summary of Transparency International Cambodia’s Organizational Capacity Assessment Session June 20-21*

Sida Reports

- *Agreement between Sida And Transparency International, Cambodia (TIC) on Core Support during 2012-2015 (2012) (and associated amendments)*
- *TI Cambodia's Action Plan to address KPMG's Findings & Recommendations*
- *KPMG (2012). Grant Assessment Transparency International Cambodia 2012 - 2014*
- *Sida (2012). Appraisal of Intervention. Support to anti-corruption in Cambodia through Transparency International's program Together Against Corruption, 2012-2015*
- *Sida (2013) Conclusion on Performance Transparency International, Cambodia*
- *Sida (2013) Decision on Contribution. Support to anti-corruption in Cambodia through Transparency International, Cambodia (TIC), 2012-2015*
- *Sida (2013) Statement on narrative and financial report. Transparency International Cambodia*

ANNEX E: MTR EVALUATION QUESTIONS AND FINDINGS

G1	Goal 1: Research and Advocacy
G2	Goal 2: Coalition and Partnership Building
G3	Goal 3: Citizen and Youth Engagement Program
G4	Goal 4: Governance Foundation and Capacity Building
S	Strategic Team (Director of Programs + Assistants, Assistants to ED, Communication Team)
The question is not relevant for the particular Goal.	

Question	Sub-question	Observations
Relevance		
Assess if the current choices of approaches and activities are relevant and strategic for the achievement of the objectives	Are the four core strategic programmes the most appropriate and relevant to the needs of stakeholders in Cambodia? Why were they chosen and not others?	<p>G1</p> <p>Valid facts and information are an essential condition to the understanding and effective tackling of any issue. By diagnosing corruption issues through comprehensive research and studies, G1 has been laying down the foundations necessary for the development of advocacy and other evidence-based projects. Corruption in Cambodia is still surrounded by a taboo that makes it hard to talk about and gather information. The NISA and YIS, TIC's main studies, have and will provide essential information that will allow for a better understanding of corruption and the identification of further areas of research and deeper analysis of issues. In turn, this improved understanding will allow TI Cambodia and its partners to advocate for change and engage people. It will also give stakeholders, especially government partners, a better understanding of corruption issues and provides them recommendations for improvement.</p>

G2	<p>Corruption in Cambodia is rampant and is a crossed-cutting issue that exists at all levels and in all sectors. Fighting against corruption thus requires all stakeholders to participate and take action against it progressively. So far, existing CSOs, at both national and sub-national levels, and the media are in need of a better knowledge and information on the fight against corruption. TI Cambodia supports stakeholders to strengthen their coordination and capacity by promoting transparency and integrity, providing trainings on anti-corruption tools/mechanisms, as well as launching and participating to joint activities to increase advocacy. TIC's many partnerships ensure that it does not duplicate efforts that already exist, but instead help strengthen the capacity of existing anti-corruption stakeholders by building on best practices and lessons learned. TI Cambodia is currently working with many stakeholders from the national level to the grassroots level, such as government partners, DPs, NGOs, private sector, political parties, individuals and media.</p>
G3	<p>TI Cambodia believes that raising awareness, strengthening citizens and youths' capacities and empowering them to hold their leaders and government accountable is crucial and very strategic. This is why the program allows youths to implement projects independently, including governance practice at the sub-national level. G3 is relevant to the needs of various stakeholders in the country, as its projects are designed with, and reach out to, youth, government institutions like the MoEYS and ACU, media partners like CCIM and WMC, NGO partners through the ALAC and garment factory unions. G3 projects are also adapted to the Cambodian context by being flexible to the current political situation.</p>
G4	<p>As TI Cambodia is a newly established organisation, strengthening its governance foundation and building its capacity are key priorities to make TI Cambodia efficient and effective and to constantly improve TIC's staff capacity to work with various stakeholders and uphold high standards.</p>

		S	<p>G1→ Evidence-based research is necessary for TI Cambodia's credibility, as it gives TIC the information necessary to back up and adequately plan projects. It helps TIC design relevant projects and provide the basis to push for change.</p> <p>G2 → A stronger voice allows for a greater impact. This is why G2 strengthens CSO capacity and best practices and build coalitions and partnerships to strategically lobby the government.</p> <p>G3 → To realise TIC's end goal (i.e. end corruption), it needs to create demand from people and engage them in the fight against corruption. Youth represent the majority of the Cambodian population, they represent the future and are ready to commit and promote changes.</p> <p>G4 → TIC's capacity building program allows for an effective and efficient work.</p>
Effectiveness			
Assess to what extent planned activities have been implemented and to what extent these contribute to stated objectives (qualitatively and quantitatively) in the Strategic Program 2012-2015. Analyze major deviations from plans and objectives.	What is the quality of the 13 NISA pillars? What progress is being made in the YIS, quality of the process?	G1	<p>The quality of NISA pillars is good. TI-S' research team constantly provided technical support to the G1 team in Cambodia. The NISA Research Advisory Group, comprised of members from diverse backgrounds and sectors, provided valuable input, which helped ensure the quality of the research and its contents. They advised TI Cambodia's research team on the planning of the research and have been closely involved with the review of all pillars. A consultative workshop with all relevant stakeholders and political parties has also helped ensure the inclusiveness of the research process and the wide variety of inputs.</p> <p>For the YIS, all data has now been collected and the Center for Advanced Studies is inputting the data. The analysis of YIS data should start in August 2014. Deviations from plans and objectives have been mainly due to the lack of time.</p>
	How many events/activities, by type have been held?	G2	<p>Activities planned in the Result framework were conducted.</p> <ul style="list-style-type: none"> • Recommendations from the NACC have been followed by stakeholders and the MoEYS set a committee and instructions to curb corruption in text-book

	<p>How many people have directly and indirectly benefited, by activity or event, disaggregated by sex and age group, and whether from Phnom Penh or outside it? How many CSOs, government agencies and other bodies have been engaged sporadically or systematically? Has this contributed to the creation of partnerships and trust ?</p> <p>How can delays in planned activities or other challenges be explained?</p>		<p>leakage.</p> <ul style="list-style-type: none"> • Raising awareness about the impact of corruption and promoting integrity and transparency at the grassroots level is key to build a strong anti-corruption movement in Cambodia. Working with CISA, a network of more than 30 local CSOs, allows TI Cambodia to reach out to citizens and youths in remote provinces and to empower them to get involved in the fight against corruption. • Recommendations/findings from the election monitoring has been used to advocate for electoral reform with the ERA. Electoral reform agenda was not in TIC's initial plan, but was very important due to national circumstances and relevant to TIC's objectives by contributing to promote transparency in the elections and political system. • Partnership with the Parliament is setback due to political issues and deadlock, but parliament members have been contacted individually. • Access to Information Working Group's coordination meetings are going well and the Group plans on working closely with UNESCO and the Ministry of Information on the draft and adoption of the law. • TI Cambodia works very closely with 7 CSO Working Groups led by the NGO Forum and CCC. • TI Cambodia and CCC are also leading the CSO Open Government Partnership (OGP) Working Group in Cambodia to advocate for transparency and open government.
		G3	<p>The total of beneficiaries amounts to more than 6.700 youths. Average of women participation: 45%.</p> <p>G3 is engaged with different stakeholders, which has contributed to the creation of partnerships and trust. This includes the private sector, government institutions, CSOs and others.</p>

		G4	TI Cambodia has organised several trainings for its entire staff, such as leadership training, digital security training provided by Development Innovations and an upcoming communication training. Several staff members have also participated to workshops, conferences and Chapter visits, where they enhanced their capacities and learn new skills.
		S	Not relevant
<p>Does TI Cambodia do analysis of gender and gender mainstreaming in the 4 components of the strategy ? Does it reflect gender issues and gender equity in its programmes, guidelines and trainings? Does it monitor gender results in its programmes?</p> <p>Does it conduct specific gender related corruption research and does it monitor the results?</p> <p>Does it target gender equity with their partners ?</p> <p>Does it have specific human rights and non-discrimination policies and are they effective?</p>	G1	Gender is taken into account, but to a limited extent. The NISA methodology is gender blind, although consideration has been given during the research to promoting the involvement of women in interviews. The YIS reflects better gender equity and issues as it has an equal participation from men and women and the results can be analysed by gender.	
	G2	Equal participation is ensured at all levels. However, in practice, women participation (for instance, in working groups) is always limited due to the specificities of the Cambodian society. Indeed, gender equality remain an important issue due to social norms.	
	G3	For all activities, TI Cambodia ensures a participation of minimum 40% of women. The trainings of team leaders especially empower women and promote gender equity. TI Cambodia ensures equal gender representation during radio talk-shows conducted with partners (guest speakers, competitors, etc.).	
	G4	TI Cambodia makes sure that women are equally represented within staff and have equal opportunities. TIC also has two staff representatives, one male and one female, to ensure gender equity.	
	S	Equal participation, transparent recruitment policies and child protection policy ensure gender equality and the respect of human rights at TI Cambodia. Regarding TIC's internal organisation, women are present at all levels, such as senior management	

			and in the Board of Directors. However, more needs to be done to mainstream gender in all projects.
Assess the main risks that might prevent the achievement of the objectives and how these risks can be mitigated.	<p>What are the risks and are they regularly reviewed? Have mitigation strategies been explored?</p> <p>Is coordination with government agencies such as ACU, MoEYS and Ministry of Justice effective and what are the hurdles?</p> <p>Is there adequate financial control of sub-contracted partners which have been identified as a high risk by Sida?</p> <p>Are the Sub-Grant Management Guidelines prepared by TI Cambodia followed and are they adequate?</p> <p>Are the funds sufficient to carry out the planned activities and what has been undertaken to reduce shortfall?</p>	G1	<p>The main risk of the NISA was the difficulty to engage with government institutions, especially the ACU. To avoid delays, contact with government officials was taken well ahead of time. The ACU, although it had agreed to an interview, failed to follow up and rejected all following proposals for an interview.</p> <p>[Security risks] The main risks are: political cut-off, intimidation and personal safety, physical harm, violation of privacy and psychological harm. The risks are not reviewed enough by TI Cambodia. Mitigation strategies have been implemented: The Executive Director's security is ensured, we have security guards, sim cards and a shredder, online security is being improved. However, it remains limited. Organising open forum discussions would be a good way to review the risks and explore mitigation strategies.</p>
		G2	<p>Anti-corruption is a sensitive issue and requires a strong commitment and support from TIC's partners, especially the government and the ruling party. Yet, their lack of commitment and adequate responses limits TIC's capacity to achieve the desired outcomes. The private sector's engagement in integrity efforts is held back, as companies are not confident enough to participate alone, but always need to get involved through a business association or chamber of commerce. Issues and risks have been mitigated by the risk log frame which is updated regularly. TIC's main mitigation strategy is to adapt timeframes and partnerships in order to ensure the delivery of outcomes (e.g NACC).</p>
		G3	<ul style="list-style-type: none"> Lack of willingness from government institutions, unclear decisions, changes, heavy and non-transparent bureaucracy: <p>1. As it is a requirement from donors to put their logos on any publication from one of TI Cambodia's partners, TI Cambodia requested the ACU to put the logos on the student books. The ACU denied it with the excuse of not getting this approved earlier by</p>

Prime Minister Hun Sen and H.E. Minister Om Yin Teang. TI Cambodia decided to take the risk to lose the cooperation agreement with the ACU if this requirement was not fulfilled. 2. ACU also takes an abnormally long time to finalise any document, such as the scenario for the educational spot and public administration fee. Mitigation action: TI Cambodia remains patient, keeps on engaging the ACU and following up on pending issues.

- Problems with the integrity of TIC's partners:

One of TI Cambodia's partner, C-CAWDU, a garment factory union, has been involved in a case of alleged fraud in its management team. The issue is significantly influenced by political parties as C-CAWDU was recently involved in protesting to increase garment factory workers' salary. Mitigation action: TI Cambodia decided to postpone the agreement until the issue was sorted out.

- Refusals from authorities to organise youth events:

Local authorities prevented TI Cambodia from organising youth-led projects at the provincial level. Mitigation action: TI Cambodia and the youths involved followed the advice from the local authority to submit the document they needed and TI Cambodia plans to sign a MoU with the MoEYS to simplify the authorisation process.

At the technical level, the ACU cooperates well on the projects under the MoU. However, TI Cambodia faces a lot of delays in implementing the projects. The ACU especially engages with TI Cambodia where and when they need TIC's help and its coordination (joint events, video spot, capacity building on M&E, procurement, etc.), but proves to be slow (and even reluctant) on other issues.

G4

As TI Cambodia is a newly established organisation, with new staff recruited from various backgrounds, it is important to build TI Cambodia's staff capacity. Mitigation strategy: 1. TI Cambodia has a clear timeframe to draft the organisation's relevant policies; 2. Staff orientation on relevant policies and TI Cambodia's programmes has been made accordingly; 3. Staff training and coaching has been planned and provided

			<p>by supervisors and external consultants in order to deliver TI Cambodia's programs successfully.</p> <p>The financial control of partners is adequate. To prevent any problem from arising, TI Cambodia developed sub-grant management guidelines that are followed by partners. For each partner, TI Cambodia forms an adequate team to support grant management and project implementation.</p> <p>TI Cambodia will experience a shortfall of funding in 2015, but a strategy is being devised to reduce it.</p>
		S	A risk log frame has been set for each program.
Assess the implementation of the recommendations from the KPMG Grant Assessment 2012, including processes and policies for allocating funds to other implementing partners.	Has the recruitment of personnel been concluded ?	G1	Not relevant
		G2	Not relevant
		G3	Not relevant
		G4	TI Cambodia seems to have fulfilled the recommendations raised by KPMG. Sida accepted the measures taken to improve the requested areas. TI Cambodia has recruited the necessary personnel.
		S	TI Cambodia responded by implemented measures improving the following areas: governance structure, staff, policies and finance.
Impact			
Assess to what extent TI Cambodia is likely to achieve the stated objectives at the end of 2015.		G1	G1 is on target. The NISA will be published in September 2014 and the YIS will be published between end 2014 and beginning 2015. Advocacy projects and the online resource library are also being developed and will be implemented by October 2015.
		G2	G2 is on target, even if some activities had to be delayed due to the tense political situation following the elections. TI Cambodia is now known as the leading NGO

			fighting against corruption in Cambodia (in the media and through partners' perception). It is engaged with partners in many sectors and supports the implementation of anti-corruption tools and mechanisms. Its cooperation agreements with CSOs are fruitful.
		G3	Despite delays in the implementation of the MoU with the ACU and in TIC's collaboration with C.CAWDU, G3 should meet most of its objectives by October 2015. TIC's involvement with youth has been successful, as well as its cooperation with media partners.
		G4	TI Cambodia is on track to meet its G4 objectives. Adequate policies have been drafted and reviewed and staff's capacity has been strengthened.
		S	TI Cambodia is likely to achieve the majority of its objectives by October 2015. However, some risks may hinder its achievements, such as the delays in TIC's work with the ACU and the postponement of its agreement with C.CAWDU.
Assess the quality of TI Cambodia's relations with relevant actors, such as government institutions, private sector, civil society and media.	How actively have stakeholders provided inputs for the 13 pillars of the NISA? Has the report been shared with government institutions, including the ACU, and has a dialogue on it ensued?	G1	TI Cambodia's relations with stakeholders during the NISA was varied. While its relations with civil society and media were very good (supporting and engaging with each other), relations with government institutions were challenging, especially with the ACU. Scheduling meetings and interviews with them for the NISA has not been completely successful. However, inputs from many other stakeholders have been provided through workshops. The NISA report has been shared with government institutions and political parties. Advocacy projects are planned to dialogue on the NISA recommendations with the government.
	How do other stakeholders perceive TI Cambodia in terms of its responsiveness to the needs of the country, its efficiency, effectiveness and impact? How	G2	The government shows less interest in working with TI Cambodia than other stakeholders, as corruption is a very sensitive issue. TI Cambodia is perceived by other stakeholders as a leading and specialised anti-corruption NGO. Civil society actors found TI Cambodia very responsive and are strongly interested in working with it. The private sector is also interested by TI Cambodia's work, but still a bit reluctant to further

	<p>useful has the National Conference on “Promoting Integrity and Quality of Education” been perceived by stakeholders and attendees? Who are other key NGO, media and private sector partners and to what extent has TI Cambodia managed to collaborate with them, in which areas and with what results ?</p>		<p>engage with it. TI Cambodia is more and more known and appreciated by the public, via media and NGO partners. The NACC on education has been perceived as very useful by participants and the MoEYS followed up on TIC’s recommendations by setting up a strategy to reduce textbook leakage.</p>
	<p>How effective is TI Cambodia’s relationship with ACU? How strongly do they collaborate and how smoothly is the MoU being implemented? How can TI Cambodia improve working with government and can it learn from other chapters ?</p>	G3	<p>TI Cambodia’s relationship with the ACU has experienced difficulties. An International Anti-Corruption Day has been organised and educational materials on corruption are being produced to educate people nationwide, but with delays and difficulties. TI Cambodia drew experience from TI Indonesia and its partnership with KPK (Anti-Corruption Unit) to introduce an integrity school curriculum at the university level. The relationship has been strained since TIC’s involvement in election monitoring and post-election publicising of election irregularities.</p>
		G4	Not relevant
	<p>What is TI Cambodia’s position as a newcomer in this arena and field ?Has it managed to establish itself as a critical contributor to fight corruption ?</p>	S	<p>TI Cambodia established itself as the leader in the fight against corruption in Cambodia. It has high visibility thanks to good media coverage and general recognition. It implements many anti-corruption projects and has a high level of engagement.</p>
<p>To what extent does the intervention contribute to capacity development</p>		G1	<p>TI Cambodia’s intervention pushes for a strengthened resolve to fight corruption among its partners and allows for a better understanding and improved awareness and capacities.</p>

<p>and strengthening of TI Cambodia and its cooperating partners? What do beneficiaries and other stakeholders perceive to be the effects of the intervention on themselves?</p>	<p>How has the grant given to CISA strengthened social accountability at grassroots level? How has the Training on Transparency and Social Accountability conducted by CISA affected the participants? What examples exist to demonstrate effects of such training? What do partners such as ERA, CCC, CHRAC and private companies under the BIP perceive of the relationship they have with TI Cambodia? What is the quality of TI Cambodia's relationship with the A2I working group?</p>	<p>G2</p>	<p>TI Cambodia has built the capacity of CISA, its members and other partners regarding anti-corruption on topics such as the Anti-Corruption Law and social accountability. In turn, actions have been taken to put into practice these new capacities (e.g. youth representatives sitting in commune council meeting, complaint boxes placed in selected provinces, etc.).</p> <p>TI Cambodia became a core member in several important working groups and made major contributions to the ERA, A2I Working Group, Open Budget Working Group, etc. TI Cambodia is perceived by other partners as a strong NGO, part of a global network. TIC's relationship with the A2I Working Group is good.</p> <p>Private companies are still not completely confident in getting involved in the BIP. TIC's relationship with PACTICS, which joined the BIP, is good.</p>
	<p>How capacitated is the ALAC? How have the grants provided to the media partners CCIM and WMC been utilised? What has been the result of those activities? How satisfactory is the level of coordination of the ALAC with CSOs and the ACU? What are the perceptions of youth regarding the Integrity Pledge? What resulted from the youth grants given after YETIs</p>	<p>G3</p>	<p>ALAC is being run smoothly and staff are well trained to manage ALAC adequately. Although ALAC is new to Cambodia, it has received good and positive feedbacks from citizens. TI Cambodia's ALAC lawyer visited the Papua New Guinea Chapter to learn more about their ALAC best practices. The ALAC staff also followed a training on the ALAC database management by TI-S. The ALAC provides free legal advice to the public, trainings and complaint handling. It is working in partnerships with two other stakeholders (soon to be three). However, TIC does not manage to cooperate efficiently with the ACU. The ALAC tried to communicate with the ACU and to get it involved in an MoU, but without any answer. Moreover, the ACU does not take any action for the cases sent to them by the ALAC.</p>

<p>and the youth-to-youth initiatives? Were there any effects or outcomes from the seed grants provided to journalists? Has the ALAC been able to fulfill its purpose? How many people have benefited from it and how?</p>		<p>TIC's grant to CCIM is used for the production of "Clean Road", a weekly radio talk-show on anti-corruption. The show is estimated to have reached five million listeners throughout the country and more than 70 people have called to directly participate to the show.</p> <p>The Integrity Pledge is a good initiative to promote the personal commitment of everyone in the fight against corruption and to demand for integrity, transparency and good governance. Due to signatories' concern, TI Cambodia will only release the statistics, but not the identities.</p> <p>Youths from YETI Camps have implemented youth-led projects in the 24 provinces. The projects included trainings, workshops, concerts and attendance to commune council meetings. Two trainings for professional journalists (25 participants each) were successfully conducted. All the participants ran their own initiatives after the training. They produced videos, newsletters and radio spots regarding anti-corruption in education, health and work.</p> <p>The ALAC has received 170 clients for legal consultation and complaint handling. Two cases have been transferred to the ACU, and two others to relevant stakeholders for further investigation. The ALAC has provided trainings to youths, citizens and NGO partners.</p>
<p>How have capacities of TI Cambodia's staff and management team improved?</p>	<p>G4</p>	<p>The funds allocated to build a strong governance foundation and capacity building have helped ensure that TI Cambodia stays relevant to the anti-corruption movement worldwide and to the local environment. The Organisational Capacity Assessment conducted by TI-S was very useful. It scored TI Cambodia at 2.9 out of 4, which is above the average and reflects TI Cambodia strong internal capacity. The staff's already good capacity to plan, implement and monitor programs, is being further improved, as capacity building trainings have been organised with budget from Sida and TI-S.</p>

	To what extent can TI Cambodia apply best practices from TI and its chapters in the region, based on past cooperation?	S	<p>TI Cambodia has applied:</p> <ul style="list-style-type: none"> • NISA methodology from TI-S; • YIS with the support of TI Vietnam; • BIP with the support of TI Malaysia; • Youth engagement programs with the support of TI Bangladesh; • ALAC with the support of TI-S and TI Papua New Guinea; • Internal control policies with the support of TI Bangladesh. <p>TI Cambodia thus collaborating with different Chapters and with TI-S to ensure the implementation of best practices. These are now being applied to TIC's own partners in Cambodia.</p>
Consider the intervention in relation to national policies and strategies.	How will the NISA contribute to the implementation of the Rectangular Strategy Phase III?	G1	The comprehensive review of the country's governance system has allowed for the identification of gaps and limits and has assessed which measures are working and which ones are not implemented. The report will therefore be very useful to further implement the government's Rectangular Strategy Phase III. Advocacy projects based on NISA findings and targeting the government will deepen TIC's efforts to contribute to the effective implementation of the Rectangular Strategy.
	To what extent have the recommendations and findings of the NACC on "Promoting Integrity and Quality of Education" been considered by the MoEYS? What has been the effect of the uptake of the recommendations and findings?	G2	<p>Following the recommendations of the NACC on education, the MoEYS issued instructions at the national and sub-national levels to take action against the textbook leakages.</p> <p>Proposed amendment of electoral reform has been shared with partners, including the UN, government, political parties and CSOs. The anti-corruption reform framework has been shared with relevant stakeholders. Proposed Open Budget recommendations have been submitted to the Ministry of Economy and Finance. An A2I model law has been shared with stakeholders, especially with the Ministry of Interior.</p>

	How has the ALAC contributed to the enforcement of the anti-corruption law?	G3	The ALAC has been playing a complementary role in supporting the enforcement of the anti-corruption law in Cambodia, however with some difficulty. Trainings on the ALAC and the Anti-Corruption Law has been conducted for CSOs and youths to build their knowledge and get them involved in the fight against corruption. A hotline allows the ALAC to provide legal advice and consultation. The ALAC takes in charge the complaint handling for clients and, when appropriate, helps them file a complaint to the ACU. Radio talk-shows implemented through TIC's partners also advocate for change and for the effective enforcement of the law.
		G4	Not relevant
		S	TI Cambodia supports different areas of the government's action, such as the UNCAC Review, the Rectangular Strategy Phase III, the ACU (by raising awareness and through the ALAC) and the MoJ (by pushing for best practices for the three laws and through the A2I working group).
Sustainability			
Assess the present situation regarding the sustainability and options for ensuring sustainable capacity and financing for TI Cambodia.		G1	Not relevant
		G2	Not relevant
		G3	Not relevant
	What strategies will be deployed to further improve the capacities of TI Cambodia's staff and management team? What capacity building support is received from TI-S and is it adequate? How close is TI Cambodia to becoming a TI National Chapter? Are	G4	TI Cambodia's staff and management team play an essential role in contributing to the success of TI Cambodia's strategic plan. The continuation of the staff's capacity building is therefore necessary and a budget should be allocated for this purpose every year. The staff capacity building policy is currently being revised. TI-S supports TIC's staff capacity building at both managerial and technical levels. Based on TIC's previous experience, it considers that this support is very beneficial but not enough for TI Cambodia and that more help should be provided.

<p>internal management and financial processes and policies in place in TI Cambodia?</p>		<p>TI Cambodia is currently following the accreditation process to become a TI National Chapter. TI Cambodia has submitted its self-evaluation form and all relevant documents to TI-S, which will review them in July. TI Cambodia should get the result by September 2014.</p> <p>TI Cambodia has set a senior management team, issued relevant memos and developed financial processes and policies.</p>
<p>To what extent have the ideas identified in the Funding Strategy been implemented upon? Is the private sector being engaged for fundraising? At what stage is the development of the strategic proposal for the 2015-2020 period? Has the Funding Strategy been further elaborated? Is there an inclination amongst other donors to fund TI Cambodia? Has Sweden taken steps to encourage other donors to co-finance TI Cambodia's activities? What strategies will be deployed to further improve the capacities of TI Cambodia's staff and management team? What capacity building support is received from TI-S and is it adequate? How close is TI</p>	<p>S</p>	<p>Difficulty arises from the challenge to find companies and businesses deemed suitable donors and from the limited habit of Cambodian companies to donate.</p> <p>A consultant will be recruited to guide the development of 2015-2020 Strategic Plan. Following TI-S' Organisational Capacity Assessment, a strategy is being elaborated to answer the needs identified and to improve areas perceived as weak. TI-S' support for the Capacity Assessment was very useful. TI Cambodia is sent all documents required for accreditation to TI-S in June 2014. TIC should receive the answer in September 2014.</p> <p>Co-funding initiatives have been developed at the regional level for the International Youth Camp with 6 other Chapters and for the OGP with CSOs in Thailand and Vietnam. TI-S is supporting TI Cambodia for the "No Impunity" campaign.</p>

	<p>Cambodia to becoming a TI National Chapter?</p> <p>Have co-funding options been explored with other in country entities, including regional efforts?</p>		
<p>Assess to what extent TI Cambodia's work is supported by local institutions and integrated with local social and cultural conditions.</p>		G1	<p>TI Cambodia's work is well supported by the civil society and independent media, less well by government institutions. Some of TIC's work is not totally integrated yet, but is in a good way to be.</p>
		G2	<p>G2's work is supported by many CSO and NGO partners, that are always enthusiastic to collaborate with it. Government institutions have proven less supportive of its initiatives. Communication with some of them can be difficult.</p> <p>In the private sector, support mainly comes from business associations and chambers, that show interest in TIC's work. However, establishing contacts with individual companies and businesses can be challenging.</p>
		G3	<p>TIC's relation with the ACU is ambivalent: collaboration on some activities can be good, while for other issues, it will be very difficult. Some local institutions have not been supportive of TIC's youth-led initiatives, refusing to give the appropriate authorisation for the activities.</p> <p>TIC's CSO partners and youth network are very supportive of its work.</p>
		G4	Not relevant
	<p>Are strategic initiatives and recommendations being developed in collaboration with local institutions as mentioned in the Funding Strategy? To what extent is</p>	S	<p>At the early stage of the development of its activities, TIC took into account the national context, the government's Rectangular Strategy and the needs of civil society.</p> <p>TIC's projects are mostly very well integrated with Cambodian socio-cultural conditions, as the majority of the staff developing projects is Cambodian and knows the Cambodian context well. When TIC adopts methodologies and best practices from</p>

	TI Cambodia taking local and social cultural conditions into account and in particular in its activities in the provinces?		TI-S and Chapters, it pays special attention to the need to adapt them to local conditions. Its partnerships with different networks of NGOs and CSOs also allows it to stay in touch with provincial and rural conditions, as the gap between rural and urban areas in Cambodia is important.
Assess the extent of ownership within local partners of TI Cambodia and their constituencies in promoting integrity and the fight against corruption.		G1	Center for Advanced Study, so local partners are not meant to have ownership.
		G2	TI Cambodia develops the capacity of its partners or their network, especially CISA, in terms of knowledge on anti-corruption and support of their strategy/plan and their own fundraising. TIC helps NGO partners implement their own activities. Community people now participate in local governance and the development of accountability, especially during commune meeting, by giving feedback on service delivery of commune councils and health centres. The MoEYS has been taking recommendations from NGOs to enhance the quality of textbook distribution from national to sub-national levels.
		G3	G3 empowers youths and citizens to take action against corruption. Participants of TIC's youth camps and trainings receive seed grants to implement their own initiatives in their own communities, which provides them a strong sense of ownership. Once the trainings completed, TI Cambodia will just act as a supervisor and let the participants take charge.
		G4	Not relevant
	What examples exist to demonstrate that TI Cambodia has created a sense of ownership in other entities ?	S	Following the third YETI, youths have been empowered to lead their own commune monitoring. Same for CISA: members are now working with commune councils. The professional journalists who participated to the training are now implementing what they learned at their workplace and on social networks.



Mid-Term Review of Sweden's Support to Transparency International Cambodia

The mid-term review of Swedish support to Transparency International Cambodia (TIC) assesses the relevance, efficiency, effectiveness, impact and sustainability of TIC's activities in Cambodia over the last two years. Findings indicate that TIC has identified very relevant topics and constituencies to work with. It has been able to graft on to the work of existing CSOs and CSO networks, enabling it to enhance both outreach and efficiency. This has also provided it with a stronger platform from which to lobby and advocate on anti-corruption issues. It has a strong focus on the youth. It organises youth camps and other trainings, and uses youth for anti-corruption campaigns and for improving dialogue between citizens and government on anti-corruption issues especially in public service delivery. While the time period since it started working in Cambodia has been short, TIC has significantly raised awareness and understanding of transparency and anti-corruption. In the forthcoming years, it needs to delve deeper into sector-specific issues and work more strongly with sub-national CSOs, while at the same time identifying opportunities to work with government on its anti-corruption agenda.

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