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Final Program Report

Strengthening Governance and Accountability

Cooperative Agreement No. 442-A-00-05-00007-00

Pact Cambodia: September 2010

SGA Final Program Report

PACT CAMBODIA

USAID COOPERATIVE AGREEMENT NO.442-A-00-05-00007-00

FINAL REPORT

1 OCTOBER 2006 TO 30 SEPTEMBER 2010

STRENGTHENING GOVERNANCE AND ACCOUNTABILITY:

- COMPONENT I: LOCAL ADMINISTRATION AND REFORM
- COMPONENT II: MAINSTREAMING ANTI-CORRUPTION FOR EQUITY

***Front Cover Picture:** Svay Rieng, March 24, 2010, a basic health and education session with children from Pong Teuk Primary School conducted as part of a social development project called “Improve basic health and living condition of the community” implemented by Pong Teuk’s commune council and supported by LAAR/USAID.*

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Acronyms

ACU	Anti-Corruption Unit
ACL	Anti-Corruption Legislation
CAEP	Commune Action and Effectiveness Process
CBI	Clean Business Initiative
CBO	Community Based Organization
CC	Commune Council
CCPA	Commune Council Performance Assessment
CCSP	Commune Council Support Program (changed to the Cambodian Civil Society Partnership)
CIP	Commune Investment Plan
CISA	Coalition for Integrity and Social Accountability (formerly CoCSOAC)
CMC	Commune Mobilizing Committee
CRRT	Cambodians for Revenue and Resource Transparency
CSO	Civil Society Organization
D&D	Decentralization & De-concentration
DANIDA	Danish International Development Assistance
DAT	Decentralization Advisory Team
DOLA	Directorate of Local Administration
EIC	Economic Institute of Cambodia
EITI	Extractive Industries Transparency Initiative
ExCom	Executive Committee
FGD	Focus Group Discussion
FOI	Freedom of Information
GTZ	German Agency for Technical Assistance
IEC	Information, Education and Communication
LAAR	Local Administration and Reform Program
MAE	Mainstreaming Anti-Corruption for Equity Program
MOF	Meeting Observation Form
MOI	Ministry of the Interior
MONASRI	Ministry of National Assembly, Senate Relations and Inspection
NAWG	National Accountability Working Group
NCDD	National Committee for Sub-National Democratic Development
NGO	Non-Governmental Organization
NLCS	National League of Communes and Sangkats
NLO	NGO Liaison Office
PACS	Provincial Association of Communes and Sangkats
PAWG	Provincial Accountability Working Group
PIM	Project Implementation Manual
PLAU	Provincial Local Administration Unit
PMP	Performance Management Plan
PNGO	Partner Non-Government Organization
RGC	Royal Government of Cambodia
SDP	Social Development Project
SGA	Strengthening Governance and Accountability Program
TOR	Terms of Reference
USAID	United States Agency for International Development
USG	United States Government
WfP	Women for Prosperity
WGPD	Working Group for Partnership in Decentralization

1. Executive Summary

The Strengthening Governance and Accountability (SGA) project implemented by Pact Cambodia over a five year period, with the support of USAID has made considerable gains.

The first component of the SGA program – the Local Administration and Reform program – has successfully developed good governance and democratic practices in target communes and has ensured support for continuing and expanding key activities including community outreach, social development projects, community mobilizing committees and public forums in the future. There is clear evidence that demonstrates that the LAAR approach works and it will have a lasting legacy on democracy in Cambodia.

The second component of the SGA program – the Mainstreaming Anti-Corruption for Equity program has also been highly successful. The program was able to maintain public pressure on the government to pass an anti-corruption law and establish an anti-corruption unit. These developments, if properly fostered and supported in the future, will have a lasting and profound effect on Cambodia, which is considered to be one of the most corrupt countries in the region.

2. Introduction

The “Strengthening Governance and Accountability” (SGA) program implemented by Pact Cambodia under a cooperative agreement with the United States Agency for International Development (USAID) includes two components: The Local Administration and Reform (LAAR) program and the Mainstreaming Anti-corruption Equity (MAE) program.

The LAAR program is a five year program that primarily focuses on commune/sangkat councils¹ and commune-level civil society groups to enhance local democracies (and by implication local development). The LAAR program achieves this by building linkages between citizens, local governments and the national government; increasing public participation in commune planning and the ‘decentralization and de-concentration’ process; and institutionalizing democratic and good governance principles and practices in local administrations.

The MAE program is a four year program that works at multiple levels to curb corruption in Cambodia by improving knowledge and awareness of corruption issues, developing skills and resources to counter corruption, effecting behavioral change, and increasing demand for changes in the legal framework of Cambodia that support transparency, accountability and anti-corruption practices.

This report forms a final report for the SGA program and its two components.

This report is broken into two sections. The first section will discuss the LAAR program and the second will discuss the MAE program.

3. SGA Agreement

On September 27, 2005, USAID awarded \$14,379,199 to Pact Inc., under Cooperative Agreement no. 442-A-00-05-00007-00, for the implementation of the LAAR program in Cambodia. In August 2006, this Cooperative Agreement was modified to include the MAE program and the award amount was increased by \$4,278,751. On September 3, 2007, a further modification was issued to Pact’s Cooperative Agreement which amended the program description. This amendment integrated the LAAR and MAE programs into the current SGA program with a total award under this amendment of \$18,657,870.

¹ From this point on ‘commune/sangkat councils’ will be referred to simply as ‘commune councils’ for ease of reading in this report.

4. Component 1: LAAR

4.1 Background to LAAR

The LAAR program was formulated to compliment the decentralization and de-concentration (D&D) strategy developed by the Royal Government of Cambodia (RGC), as part of the Governments Rectangular Strategy for growth, employment, equity and efficiency in Cambodia. The Rectangular Strategy is the RGC's core strategy for transitioning Cambodia to a liberal democracy following decades of civil war, foreign occupation and genocide. In the eight years since the first commune council elections, in February 2002, Cambodia has made considerable progress towards achieving decentralization and de-concentration, however much remains to be done before commune councils are capable of fulfilling their role, as mandated under Cambodian law, and implementing robust and effective programs without external assistance.

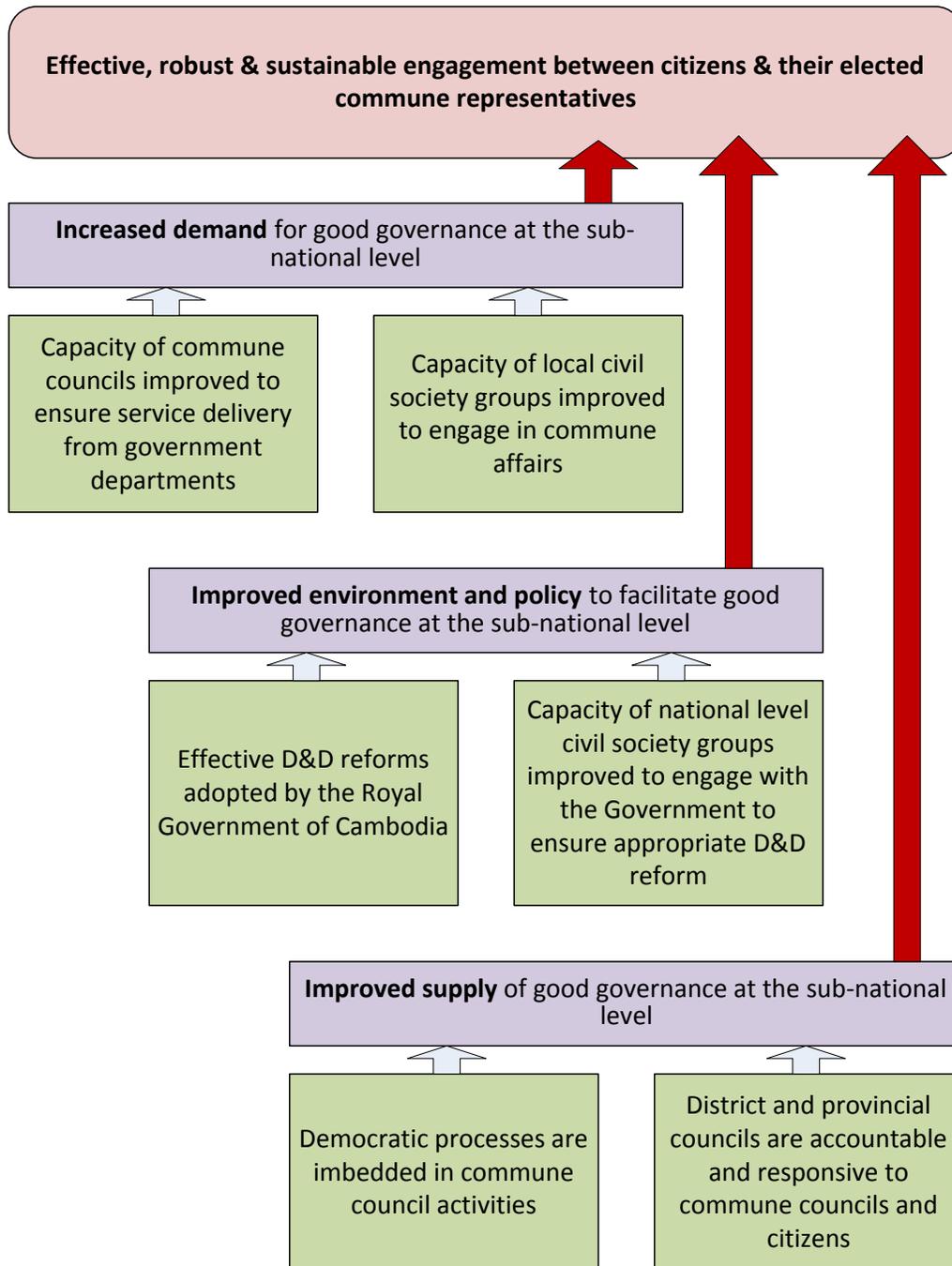
In April 2007 - following the second local government elections - approximately 11,261 councilors were elected to 1,621 commune councils across Cambodia; 70.4% of whom are aligned with the ruling Cambodian People's Party (CPP) and 14.6% of whom are women. It was these councilors that LAAR would focus on over its five year lifespan.

LAAR was specifically designed in response to a perceived need to strengthen civic participation in decision making, a limited access to information and the need for citizens to hold their local representatives accountable. By strengthening local governments LAAR hoped to enhance democracy, promote good governance and curb corruption at the local level, where citizens have the greatest contact with authorities. This in turn, LAAR believed, would result in improved and responsive decision making, and more effective and efficient local development.

4.2 Project Model

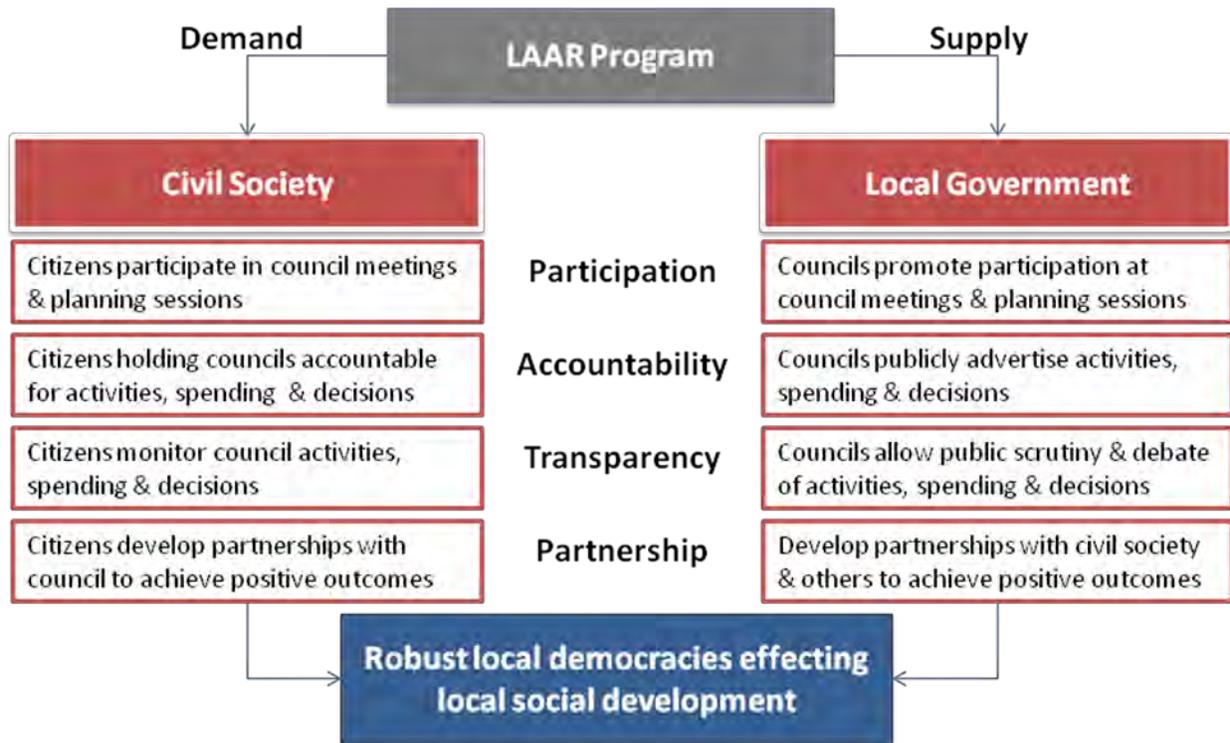
The LAAR model of change was based on the notion that by improving the 'supply' of local governance by commune councils to their constituencies while simultaneously building the skills and confidence of local civil society representatives to 'demand' better governance and decisions from the local representatives, and working with the Royal Government of Cambodia to create an 'enabling environment' in which reforms could occur, that local democracies would be enhanced through effective, robust and sustainable engagement. This in turn would result in commune councils and their constituencies working more effectively together to make better decisions that facilitated more responsive local development. This logic is more clearly expressed in the following diagram.

The LAAR model of Change



Underpinning this model of change was a specific understanding of good governance, which was reduced to four core principles tied to specific actions by the LAAR program to ensure easy comprehension and recall by program participants. The LAAR model good governance principles were participation, accountability, transparency and partnership. This logic of this model of good governance and the associated behaviors are expressed visually in the following diagram.

The LAAR Model of Good Governance



The four principles of good governance, and corresponding behaviors, were encouraged throughout the LAAR program in interactions with program participants, in LAAR training modules and in other educational materials.

The following ‘Good Governance’ poster is an example of how this was done. This poster was produced by LAAR and disseminated to all target commune councils, community mobilizing committee members and other stakeholders. In the centre of the poster we see a monthly commune council meeting in process with the participants reflecting on the meaning of good governance. From the top left going clockwise we see pictures highlighting partnership, participation, accountability and transparency.

At the base of the poster, the principles are spelled out more clearly:

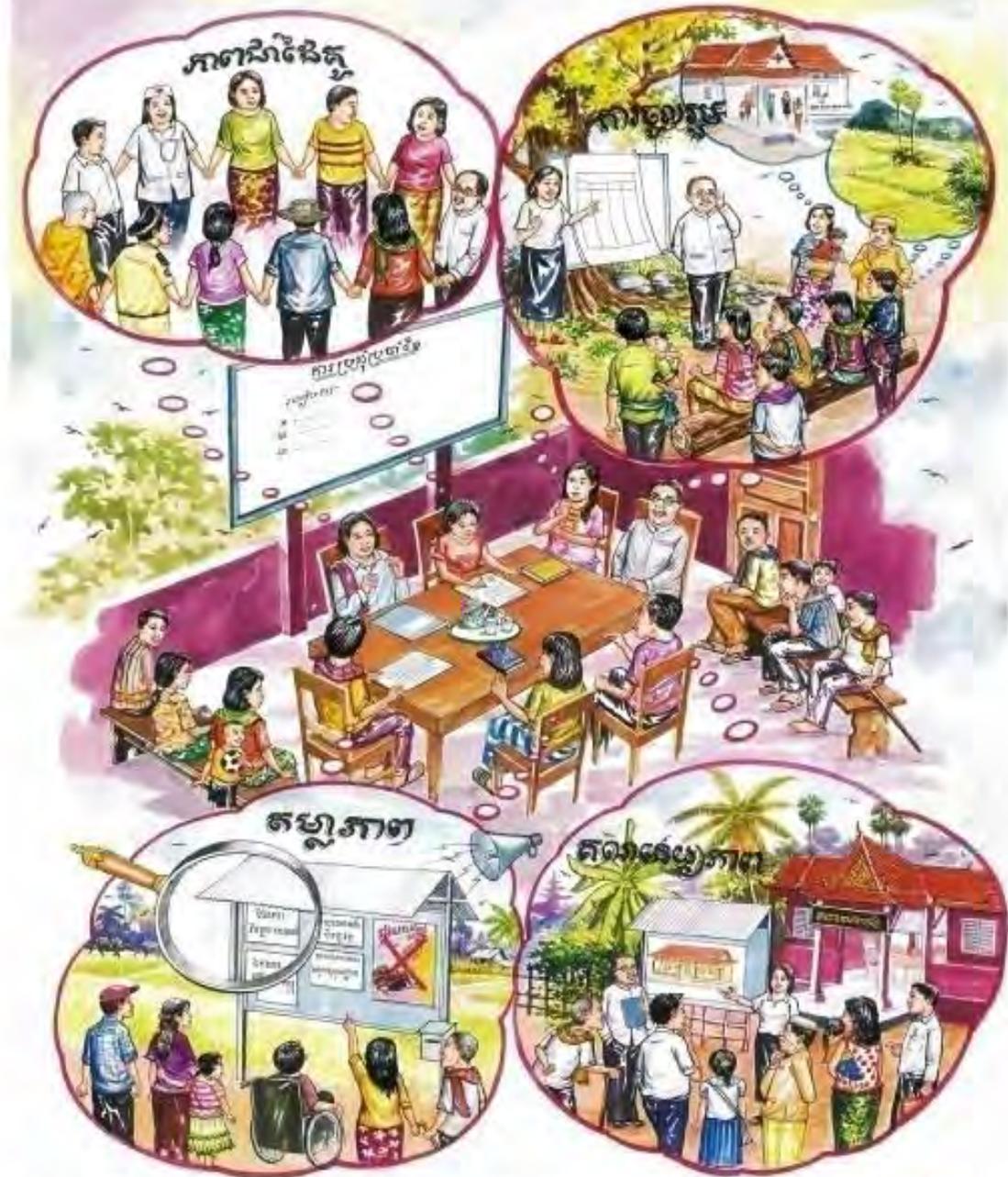
“Partnership: Civil society organizations, commune councils, government agencies and other stakeholders work together to improve the community.

Participation: People, community based organizations, village development committees, village level networks and other community members must engage with the commune council.

Transparency: The public can access information on decision making, activities and the use of budget of commune councils.

Accountability: Understanding of the role and responsibility of commune councils, with attention and responsiveness to the needs and priorities of the people.”

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Put more succinctly, LAAR believed that by ensuring that good governance principles were implemented at the local level then both the supply and demand of local democracies would be enhanced, and that this would lead to better decision making (stronger democracies).

To ensure behavior change in target communes, LAAR took a multi-dimensional approach to establish stronger relationships and trust between commune councils and citizens. This included an intensive capacity building aimed at developing the core skills of commune councilors and community mobilizing committees members; establishing networks within and across communes/sangkats; developing partnerships between commune councils and other local stakeholders (such as service providers); assisting commune councils to identify, prioritize and respond to community needs; and, enhancing local development through social development projects (SDPs).

Social development projects were a signature feature of the LAAR model. Through SDPs LAAR aimed to assist commune councils to respond to social issues (often for the first time) in their community and build the skills of councilors through practical experience which could result in tangible and replicable results. In this way, SDPs afforded opportunities for commune councilors and community mobilizing committee members to put good governance principles into practice, and to 'learn by doing' with technical support from LAAR.

To ensure the sustainability of program outcomes, it was important for the LAAR program to promote local ownership of key activities. To this end, SDPs were co-funded by LAAR (approximately 60%) and commune councils (approximately 40%). By asking commune councils to co-fund SDPs, LAAR hoped to not only to ensure local ownership of the projects themselves, but also of the concept of SDPs (that being projects aimed at improving the livelihood and health of the community), and the good governance principles underpinning these projects. By taking such an approach LAAR aimed to ensure a continued commitment to non-infrastructure projects by commune councils after LAAR had phased out.

Lastly to sustain and integrate good governance practices into commune council daily operations, LAAR introduced and promoted various participatory methodologies, such as community outreach and public forums. By assisting commune councils to implement such methodologies, LAAR aimed to demonstrate the benefits of civic participation and ensure that such concepts were integrated into the regular work of the commune council.

4.3 Project Roll Out

During the first year of the program (financial year 2006²), LAAR went to great lengths to lay the foundations for the coming years and the eventual success of the program. Roll out activities included:

- Consulting with relevant government agencies, civil society groups, NGOs and development partners to ensure the program activities and good governance mechanisms introduced were building on the existing efforts;

² As a USAID sponsored program, financial years ran from October 1 to September 30. Thus the financial year 2006, ran from October 1, 2005 to September 30, 2006.

- The recruitment of qualified national staff;
- The competitive procurement of national partner NGOs to train provincially based NGOs;
- The training of LAAR staff and national training partners in the principles of good governance and the cross-cutting issues of the program;
- The establishment operational systems for the selection of provincially-based partner NGOs³ (PNGOs) and target communes⁴, data collection and management, and the financial management of grants;
- The development and extensive testing of training material with national training partners (VBNK and SILAKA) after lengthy discussions;
- The negotiation and signing of a Memorandum of Understanding between USAID and the Ministry of Interior (MOI);
- Signing of Memorandums of Understanding between LAAR management and eight provincial authorities with facilitation support from MOI;
- The development and testing of guidelines for the management and implementation of community outreach, social development projects, the use of commercial bank system and commune financial management;
- Obtaining permission from the MOI and Ministry of Economy and Finance (MOEF) to use commercial bank accounts with commune councils for the first time;
- Supporting a re-invigoration of the NGO Liaison Office (NLO) based in the Ministry of Interior to ensure better communication between NGOs and the MOI;
- Conducting public awareness raising prior to the local government elections in early 2007, in partnership with the Neutral and Impartial Committee for Free and Fair Elections in Cambodia (NICFEC) using social theater focusing on good governance, decentralization and women as commune leaders;
- Initiating the female councilors forums, with the German Agency for Technical Assistance (GTZ) and Oxfam Great Britain, to enhance the quality of female representation;

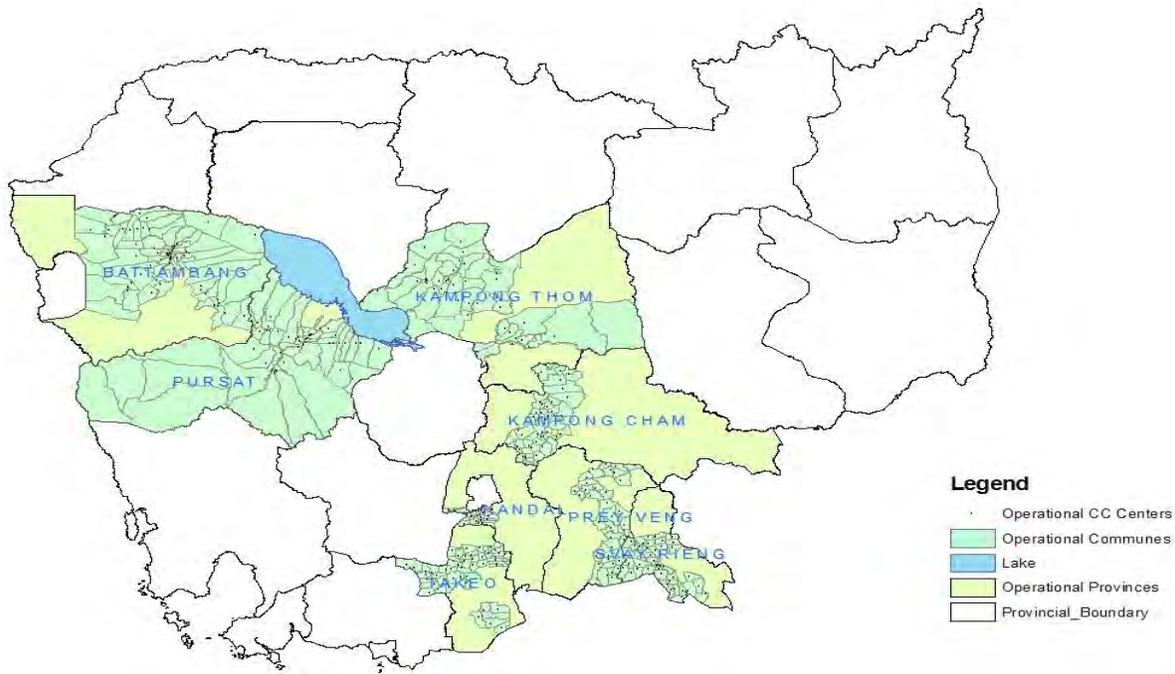
³ A transparent and systematic process was introduced to identify and select PNGOs based on Pact capacity assessment tools. PNGOs were largely selected based on their experience working with village groups and community based organizations and/or their potential to establish strong links between commune councils and community groups. A proposal writing workshop was also organized for short-listed PNGOs prior to the final proposal submissions. After selection PNGOs had an opportunity to negotiate before the contracts were finalized and signed.

⁴ To assist with program implementation treatment all the communes of specific districts were selected. Treatment districts were selected based on the representation of multiple political parties on commune councils and presence of female councilors. Meetings to discuss the selection criteria and process were held between LAAR staff, PNGOs and provincial administrations.

- Acquiring the services of the decentralization advisory team (DAT) to conduct an initial review of the program; and,
- Supporting the first field mission of DAT team to provided timely feedback on of the project design and rollout.

“It is critical that LAAR positively address its commitment to civil society engagement and the development of the demand-driven local governance”, Decentralization Advisory Team, May 2006.

Although the program was originally planned to slowly roll-out and achieve full coverage of 500 communes in 10 provinces by the third year of project implementation, within a short period of time it was clear that to do so would undermine the quality of the project considerably. Instead, coverage started in 2006 with 69 target communes/sangkats in three provinces (Battambang, Takeo, and Pursat), which was then expanded to 230 communes/sangkats across eight provinces in 2007 and then further expanded to the final coverage of 356 communes/sangkats across eight provinces in 2008. As a result, two provinces, Siem Reap and Oddar Menchey, originally identified for inclusion in the program were left untreated. The final coverage of the LAAR program can be seen on the following map.



The decision to reduce program coverage was made in response to an assessment by DAT which stated in October, 2006, that *“...it is not possible to maintain equilibrium and achieve the quantitative target of 500 communes by Year 3 of the Program using existing implementation strategies...even with the adoption of phasing and variable intensity, the target of 500 communes in 10 provinces is not achievable”*.

In May 2009, an independent USAID mid-term evaluation team applauded this decision noting that *“Implementing LAAR in 356 communes seems “about right,” enabling Pact to focus on quality while maintaining a significant “footprint” so LAAR can influence national policy”*.

Another issue faced during the roll-out of the program was an underestimation of the time required to develop the capacity of commune councils to manage grants. This underestimation had major implications for other activities, diverting resources away from civil society strengthening exercises.

To ensure effective knowledge, skills and attitude development at the grass-root level LAAR adopted a flexible series of short training and action planning sessions, followed up with intensive coaching support for trainees at the project sites. As LAAR began the roll-out of grants to support commune councils implementing community outreach and social development projects, it quickly became clear that the financial skills of councilors were severely under-developed and that many were totally reliant on the commune clerk to manage the commune finances. To deal with this, LAAR felt that it was necessary to first concentrate on developing the capacity councilors so that they could monitor the work of the clerk and make better decisions about spending, before focusing on the ability of civil society groups to monitor and question the council about their decisions and spending. This would also mean that councilors were better positioned to answer questions on spending from the community.

Initially, LAAR hoped that by simply including civil society - in the form of LAAR created community mobilizing committees (CMC) - in councilor training sessions that both councilors and CMC capacity would be improved at the same time. While this may have been true for a number of higher capacity CMC members, this was not true for the majority and it became evident as the program progressed that focused and responsive training and technical assistance conducted away from commune councilors was required to develop CMC member skills and confidence. In the second half of the program, as commune councilors were becoming more effective, LAAR was able to dedicate more time to developing and implementing a CMC specific capacity building program. While this program was highly successful in a number of communes, resulting in highly engaged and active CMC members, the results of these efforts were inconsistent and time consuming. As a consequence, in the final stages of the program, LAAR was forced to drop assistance for CMC groups demonstrating a lower capacity to focus on CMC demonstrating a higher capacity; where the sustainability of CMC functions was most likely to take hold⁵.

Given the profound affect that this concentrated training and technical assistance had on stronger CMCs by the end of the project, it seems likely that if LAAR had been able to spend more time and energy working with all CMCs then it would have been possible to improve the capacity of weaker CMCs and achieve even stronger results using the CMC model. As it was, due to the sidelining of civil society specific issues in the programs early stages, LAAR’s success in this area was limited.

This problem aside, the inclusion of CMCs in councilor focused training and technical assistance sessions did have a positive effect, as it enabled councilors and civil society representatives to build rapport and trust; an invaluable commodity in local democracies. At the beginning of the program many councilors

⁵ This decision was made in response to a DAT recommendation made following the 6th DAT mission and reported to Pact in November 2009.

were suspicious of CMCs, likening them to an opposition group, but by the end of the program they had grown so close that many councilors felt that they were CMC members themselves. The training sessions were therefore important in breaking down initial barriers between CMCs and councilors.

This need to concentrate on commune council capacity building during program roll-out also had repercussions for other activities. In May 2006, the DAT noted *“LAAR does not have the resources to successfully combine all of the activities proposed in its program documents. A number of those activities are poorly linked to Program objective”*. In response to this, LAAR management decided to drop three activities: the development of district resource centers, a model commune council awards program and funding for the National Audit Authority to conduct audits of commune councils.

LAAR instead, invested its limited resources into district, provincial and ministerial level dialogues, to help facilitate the implementation of social development projects through modifications to the Project Implementation Manual (PIM) for commune councils. Though these efforts LAAR was able to ensure that appropriate and timely guidance was issued to commune councils so that they could transparently procure services for SDPs by local service providers, finalize contract agreements between the council and service providers, allocate matching-funds to SDPs and adopt budget disbursement procedures for service providers.

LAAR also devoted time and effort at the national level with the Ministry of Interior and the Ministry of Economy and Finance/National Treasury to trial a system of dispersing funds to commune councils through the commercial bank system (effectively circumnavigating the slow and burdensome process of dispersing funds through provincial treasuries) and to ensure that commune councils were able to allocate matching-funds for social development projects. As a result of this work, the Senior Minister and Minister of Economy and Finance issued a formally letter to the Deputy Prime Minister and the Minister of the Interior that agreed to allow LAAR to release LAAR budget allocations to commune level through a commercial bank system.

In the end, this work with the higher levels of government was vital for the success of the LAAR program. Not only did it enable LAAR to implement reform at the local level more effectively and to resolve problems efficiently (such as lower level corrupt individuals seeking to disrupt project implementation⁶), it also established a relationship that LAAR could use in the later stages of the project to ensure government ownership of program processes that promoted good governance, such as community outreach, and provided an opportunity for senior officials to expand their understanding of good governance in practice.

The establishment Memorandum of Understanding established between USAID and the MOI, and the subsequent establishment of the Executive Committee (ExCom) for the implementation of the LAAR program chaired by the Secretariat of State of the Interior Ministry, were thus important and useful

⁶ Despite the common practice of paying stipends to local officials by many international NGOs, LAAR felt that to do so was counter to the principles that it was trying to promote. As a result, LAAR made no payments to government officials for their participation in the program. At times, this meant that it was difficult to work with a small number of lower-level officials who ignored or actively resisted the program. By working with the higher authorities to exert their authority with problematic individuals, LAAR was able to turn the majority of these people around.

factors in LAAR's success. Through the ExCom LAAR was able to develop a framework for communication and problems solving with the MOI, provide updates on LAAR activities to key government agencies and other related development partners, communicate key messages on good governance to key government decision makers, coordinate the dissemination of program learning and outcomes, and revise the program work plan in response to changes in strategic framework for decentralization and de-concentration reform and the organic law. Through the ExCom a technical working group from MOI was assigned to work closely with LAAR to monitor program implementation and to document LAAR best practices in order to share them with various D&D stakeholders and used them to inform the national policy and guidelines.

Another important challenge that affected program roll-out was the limited capacity of local staff and PNGOs in the area of good governance; a relatively new concept in Cambodia at the time. LAAR was initially expected to hire sufficient personnel to provide support directly to commune councils and CMCs from provincial field offices that were to be established under the project. However, it was quickly clear that this was not feasible due to the limited capacity available in the provinces, especially in regards to understanding good governance and decentralization.

Consequently, LAAR management decided to work through provincially-based partner NGOs. This came with its own challenges, not the least of which was the slow start up of the program activities due to the limited and varying capacity and experiences of PNGOs and the lack of direct accountability to LAAR management. To overcome these challenges LAAR provided intensive training to PNGO staff and restructured the project to ensure that appropriate support was available to field staff. While these factors limited the project at the start, they are likely to be asset for sustainability, as LAAR did not recruit local talent away from local NGOs and has now effectively decentralized the skills and abilities to assist commune councils and civil society groups local NGOs.

This view was shared by the USAID evaluation team who stated that (May, 2009) *“Working through PNGOs necessarily required slow start-up and systematic preparation. But advantages included:*

- *Pact did not recruit provincially based staff away from local NGOs.*
- *PNGOs' relationships with CCs and commune residents and knowledge of local governance will be useful to civil society and councils post-LAAR.*
- *The LAAR experience will enhance PNGOs' skills in implementing virtually all of their future activities. E.g., in five of eight LAAR support provinces, a LAAR PNGO represents civil society on the Provincial Government Accountability Working Group.”*

4.4 Project Management

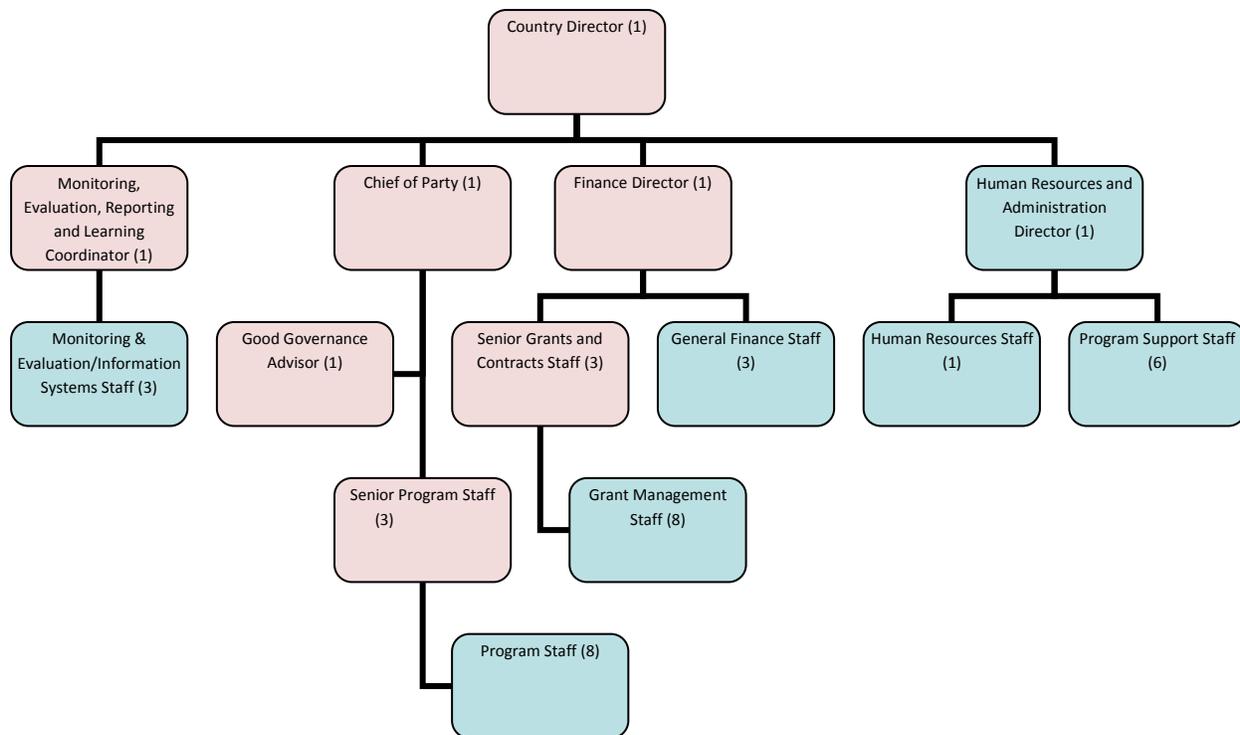
As mentioned in the previous section, a major assumption about the LAAR program was that Pact would be able to quickly recruit local staff with a thorough understanding of good governance concepts to implement the program effectively. This simply was not true. At the start of the program there was very little understanding of democracy and good governance amongst local people. This lead DAT to note

(October, 2006) *“The DAT team continues to have very significant concerns about the capacity of LAAR program staff...”*.

LAAR management worked to address these issues by organizing a series of internal strategic workshops to deepen conceptual knowledge and understanding of Pact staff, conducting bi-weekly staff meeting to identify solutions to problems and improved action plans, and replacing staff who demonstrated sustained insufficient capacity. In October 2006, Pact also restructured the management structure of the program to ensure that the roles and responsibilities of program staff at different levels were clearly defined (giving senior staff more responsibility to guide and manage junior staff).

From this stronger base, program staff were better equipped to develop the skills and knowledge of over 120 partner NGO field staff, as well as commune councils and community mobilizing committees. A lot of time and effort was required to increased staff conceptual knowledge and understanding of the key issues being addressed by LAAR, to improve understanding of the processes of providing technical assistance and mentoring as capacity building mechanisms, to broaden the roles of partner NGOs so that they could develop links between commune councils and civil society, and to explore various approaches to engaging citizens in commune council activities.

By splitting the program responsibilities and outcomes between four teams: one responsible for program outcomes, one for financial accounting and grant management, one for program monitoring and evaluation, and one for human resources and logistics. The program put in place internal checks and balances to ensure that all staff performed their duties appropriately and that there were alternative avenues for complaints. Although the exact nature by which this was managed altered over time and the Chief of Party retained final approval on spending throughout the program, the basic structure adopted is presented in the organizational chart below. Those positions deemed to be part of the management team for the LAAR program are shaded in red. This team met on regular basis to discuss staffing and program issues.



Unlike its sister program, the MAE program, LAAR had fairly consistent senior program management throughout the program, and when there were transitions in the leadership, there was considerable overlap. This meant that the program and the staff were not distracted by internal issues, and that management was aware of any issues that arose and were able to quickly respond to them.

In May 2009, the USAID mid-term evaluation acknowledged that this work had paid off reporting that *“Pact currently has the leaders and staff in place to carry LAAR to a successful conclusion and help PNGOs and partner CCs prepare for the future”*.

Following a competitive and transparent selection process, the program took a cascading approach to project implementation and management, using the local provincially-based partner NGOs (PNGOs) to implement the program at the commune level, where they worked directly with commune councils and community mobilizing committee members. To ensure that the program was being management efficiently and with some consistency across the eight provinces, LAAR hosted quarterly meetings with PNGOs. During these meetings PNGO staff discussed and resolved challenges, reviewed program data, strategized future activities and developed quarterly action plans.

In the field PNGOs were supported by Pact program and finance staff. One project officer and one grant management officer was responsible for all the activities in a single province and were responsible for regularly monitoring and coaching PNGOs, as well as providing direct assistance to program beneficiaries in partnership with PNGOs. While this participatory and cascading approach to management was often slow and complicated, LAAR feels that the long term benefits of this approach ensured that local skills and experience continue to contribute to decentralization and de-concentration in target provinces.

This view is reinforced by the USAID evaluation team (May, 2009) who stated that the *“Impacts of LAAR - the big picture: The LAAR model - working directly with CCs through PNGOs, emphasizing participation, transparency, and accountability - has been the right approach at the right time”*.

While LAAR largely stayed removed from the internal workings of PNGOs, allowing them to manage their own resources as they saw best, LAAR did conduct initial capacity assessments and follow up performance assessments with PNGOs to ensure that they had the appropriate financial management and program management systems in place to carry out the program at the highest standards possible. Following these assessments senior management met with PNGO management to discuss their strengths and weaknesses, and to develop a plan of action for improvement where necessary. In the later stages of the project, progress on these action plans was required before contracts extensions were renewed⁷. Although there were often some minor issues identified in the review process, generally the PNGOs had strong systems in place to implement the project effectively and were responsive to the constructive criticisms offered by Pact.

Through this performance assessment process and because of the strong lines of accountability established by LAAR with PNGOs, on two occasions LAAR identified malfeasance in two PNGOs. Although the problems identified were not concerned with LAAR monies, LAAR management felt that there was strong enough evidence and that the risks to the program reputation were such that the only option was to terminate the two PNGOs concerned⁸. It is a testament to the program management that despite these setbacks, the program was able to shift responsibilities for the target communes covered by these PNGOs to other partners, without sacrificing the quality and scope of the program.

4.5 Project Monitoring and Evaluation

As per USAID requirements, LAAR produced a Performance Management Plan⁹ (PMP) to monitor the performance of the program in achieving key outputs. Initially, it was felt that the PMP, along with the regular DAT assessments, regular monitoring and an annual Citizen Satisfaction Survey, would be sufficient for the monitoring and evaluation of the program. However, as the program progressed it became apparent that the complexities of the program were not being captured by this approach and that it was not feasible to conduct a large survey on a yearly basis. This led the DAT team to suggest the establishment of a dedicated Monitoring and Evaluation Unit. In response Pact management established a Monitoring, Evaluation, Reporting and Learning (MERL) Unit and recruited a MERL Coordinator to lead monitoring and evaluation efforts in July 2008.

Activities implemented by the MERL unit included:

- A review of program logic and a gap/needs analysis;

⁷ Contracts between Pact and PNGOs were reviewed and re-issued annually.

⁸ Initially LAAR worked with 15 PNGOs across 8 provinces. This was reduced to 13 PNGOs by the end of the program.

⁹ A list of the indicators from the PMP is listed in the annex.

- A detailed review and upgrade of data collection methodologies for the indicators outlined in the PMP, which more clearly outlined roles and responsibilities for monitoring and evaluation and data quality checks;
- The development a comprehensive MERL plan that went beyond the indicator data, with a view of presenting a more holistic view of the program;
- A capacity building program designed to developed staff, PNGO and beneficiary capacity in monitoring and evaluation;
- Overseeing and analyzing the results to two Citizen Satisfaction Surveys which sampled over 2,300 citizens and councilors from LAAR and non-LAAR target communes;
- Focus group studies designed to dig deeper into participants understanding of key LAAR concepts and practices, to complement and triangulate survey data;
- A most significant change story process to gain a better understanding of program impact from the participants point-of-view;
- The piloting of a participatory governance self-assessment and action planning process for local governments and communities, called the Commune Action and Effectiveness Process;
- An end-of-program stakeholder evaluation workshop, designed to gather greater insight into the programs outcomes and impact from program stakeholders;
- A survey and focus group study of the ‘WORTH for Civic Engagement Pilot Project’, designed to measure the effectiveness and merit of the pilot project;
- A detailed end-of-project review of monitoring data reviewing patterns and changes over time; and,
- An impact evaluation and a summative evaluation of the program seeking to draw out the greatest learning possible from the program data and the above mentioned activities.

Through these activities, complimented by the semi-independent DAT evaluations and the independent USAID mid-term evaluation, the MERL unit sought to ensure that the program was evidence driven, able to demonstrate impact (i.e. establish a counter-factual case), and able to generate the greatest learning possible.

In taking this approach it soon became clear that the PMP was not an effective or useful way of measuring change for the LAAR program, or more generally in measuring change as a result of democracy and governance interventions¹⁰. Indicators, by their very nature are not an effective means

¹⁰ A view shared by the National Academy of Sciences who were commissioned by USAID to undertake a study of USAID D&G programs. The results of this study can be found in the 2008 publication ‘Improving Democracy Assistance: Building Knowledge through Evaluations and Research’.

of assessing the complexities of programs aimed at creating broad social change, such as the LAAR program. In fact, prior to the establishment of the MERL unit, the program was being distorted by its need to meet arbitrary and micro-level outputs that missed the essence of what the program was about.

The LAAR indicator *“Percentage of LAAR partner communes in which active participation by women in regular CC monthly meetings increases by 5% or more”* provides a useful example of this. In pursuit of this indicator LAAR exerted great amounts of resources and time developing a mechanism - the meeting observation form¹¹ - to capture this data, training PNGO staff to better understand the purpose of collecting this data and to complete the form properly, sending PNGO staff to as many commune council meetings as possible to observe and complete the form, developing a database to store and collate the data, paying data entry clerks to enter the data into the database and check the data for errors, conducting spot checks and audits of data, and finally paying for a report writer to incorporate and analyze this data in each quarterly report.

Yet, despite these grand efforts by the LAAR program, the indicator did little to inform management of what was really happening at commune council meetings. Instead, it masked an emerging problem – that active female participation at commune council meetings was actually in decline. It was able to mask this problem by focusing on the percentage of meetings where women were active rather than the actual number of women who were active at meetings. Fortunately LAAR was able to identify this problem in time and implement activities to counter this problem, and to change the indicator so that it reflected the real needs and outputs of the program.

For a program such as LAAR, it is important to remain focused on more general change and to maintain monitoring and evaluation systems that are in keeping with the programs democratic values. Thus it is important to adopt monitoring and evaluation systems that make use of a combination rigorous qualitative and quantitative methodologies but which can produce results that are accessible and intelligible for donors and beneficiaries, and demonstrate real change as a result of the program.

Mid-program LAAR made some bold changes which enabled this to occur – refining the citizen satisfaction survey, conducting focus groups and implementing most significant change. This allowed LAAR to create a fuller picture of the change occurring as a result of the program and to demonstrate impact. But by not undertaking these activities at the start of the program, and instead focusing on gathering data for arbitrary indicators, LAAR missed the opportunity to establish a strong baseline and demonstrate the programs full impact.

Furthermore, by refocusing on the broader change desired by the program, LAAR was more able to more clearly articulate what the program was about, to communicate this more effectively to PNGOs and other stakeholders, and pursue more appropriate strategies for making the desired outcomes occur. These are all important factors when dealing with new concepts and broad social change programs. The change in focus adopted by the LAAR program can be witnessed in the progression of program reports as they shift from being output and indicator focused to being outcome and impact focused.

¹¹ The meeting observation form was a second attempt to develop a mechanism to collect data for this indicator after the first attempt – a monitoring handbook - proved to be too complicated for data collectors to complete properly.

In the end, the program was able to demonstrate a great amount of change as a result of the program; this evidence will be presented in the remainder of this report.

4.6 Project Activities and Outputs

LAAR Goal and Objectives: The goal of the LAAR program was ‘effective robust and sustainable engage between citizens and their elected commune representatives’.

The objectives of the program were:

- Build sustainable horizontal and vertical links between citizens, local government and national government (increase demand);
- Increase public participation in the Commune Investment Planning and Decentralization and De-concentration reform processes (improve policy); and,
- Increase and institutionalize participatory democratic processes and democratic practices within sub-national government (improve supply).

To achieve this, LAAR worked through 13 sub-contracted provincially based partner NGOs with 356 commune councils, 356 local civil society groups (community mobilizing committees), 38 district authorities and eight provincial authorities in target areas; Battambang, Pursat, Kampong Cham, Prey Veng, Kampong Thom, Kandal, Takeo and Svay Rieng Provinces. In total, LAAR worked with 3,164 commune council members (2,742 male & 422 female) and 3,955 CMC members (2,207 male & 1,752 female) from target communes.

At a national level, LAAR aimed to actively stimulate national reform with partners including MOI, MOEF, the National Committee for sub-national Democratic Development (NCDD), the Working Group for Partnership in Decentralization (WGPD), the Commune Council Support Program (CCSP) and the National League of Communes and Sangkats (NLCS).

LAAR activities fell into six broad areas which were aligned with the programs objectives:

- Assisting citizens to engage in affecting change;
- Assisting commune councils to broker services and establish partnership with service providers;
- Working with the Royal Government of Cambodia to adopt relevant reforms to facilitate the decentralization and de-concentration process;
- Working with national civil society groups to better coordinate decentralization and de-concentration reform activities;
- Assisting commune councils to embed democratic process in commune council activities; and
- Promoting good governance values of participation, accountability, transparency, partnership and equity, and the responsible stewardship of natural resources.

A signature feature of the LAAR program was the provision of financial and technical support for the implementation of 654 SDPs by commune councils with a 39% cost share funded from the commune or sangkat fund, and the provision of 356 community outreach grants to commune councils. These SDP and outreach activities cut across many of these broad activity areas and program objectives, but are largely elaborated on in this report under the objective three and the activity area 'Assisting commune councils to embed democratic process in commune council activities' for ease of discussion.

In order to achieve these outcomes, LAAR conducted an extensive training program with commune councils and community mobilizing committees, which complimented technical training delivered by the NCDD to the newly elected councils in 2007, to lay the ground work for future training and technical assistance provided to implement activities under the LAAR program. The training was broken up into the four modules (and a pre-module) that were first delivered to PNGO staff, by National Training Partners SILAKA and VBNK, who in turn used them to train commune councils, while providing ongoing technical assistance to implement the lessons they had learned and use the skills they had developed.

The Pre-Module titled 'Introduction to Decentralization and De-concentration, LAAR concepts and capacity building approaches' was designed to provide PNGO staff with an orientation on the key concepts related to decentralization and de-concentration, and to inform them of the relevance to the LAAR goals, objectives and principles. Additionally, this module introduced the LAAR PNGOs to their roles and responsibilities under the program. This module was designed specifically for PNGO staff and was not echo-trained to commune councils and community mobilizing committee members.

Module A 'Civil Society Participation & Community Monitoring' was designed to expand PNGO and program beneficiaries understanding of the core principles of civil society participation, and to improve their skills to monitor and enhance community participation in meetings and commune planning events. Module A provided participants with opportunities for clarifying participatory tools (such as community mapping), developing further skills to conduct participatory processes for community meetings, and to utilize community resources to solve community problems.

Next Module B 'Commune Councils & Civil Society Outreach' was developed to assist PNGO and program beneficiaries improve understanding and skills on the core principles necessary for facilitating engagement between commune councils and civil society using existing partnerships as entry points. Through Module B trainees learnt how to clarify and enhance effective communication, facilitation, and coaching skills that contribute to identifying and broadening participation of under-represented groups. PNGOs also learnt how to apply their skills to support commune council planning and community outreach activities.

In Module C 'Addressing Social Development - Project Proposal & Financial Management' PNGOs and program beneficiaries developed the understanding and skills necessary to apply the LAAR core principles in their routine activities. This module particularly focused on using SDPs as a tool for increasing the quality of engagement between commune councils, civil society and community based organizations (CBOs). In follow up to this training, PNGOs were responsible for developing commune council commitment to public participation in a priority setting, identifying social improvement

priorities, developing and writing project proposals, ensuring appropriate financial management and ensuring their accountability.

Lastly, Module D 'Social Development Fund Project Implementation' had two parallel objectives. Firstly, it sought to provide a refresher and update of previous trainings (Module C) focusing on tasks to be accomplished in the next 3-4 months to ensure that essential elements were applied from PNGO training at commune council level (particularly in new communes). Secondly, Module D developed PNGO and beneficiaries understanding and skills in using participation in problem solving and conflict resolutions. Following training in this module PNGOs would provide guidance and encouragement to beneficiaries so that they had the communication, facilitation, and coaching skills necessary to facilitate community processes in advocacy, find solutions to local problems, and build local leadership skills for sustaining public participation in finding solutions to community problems and issues.

After implementing this general training program to boost commune councilor and CMC members general understanding and skills, LAAR sought to implement activities that were specifically aligned with the program objectives, in order to maximizing the impact of the program. These activities are described according to activity area below.

Activity Area 1: Assisting citizens to engage in affecting change

Community Mobilizing Committees: LAAR worked to increase the capacity of civil society at the commune level through CMCs; groups of local citizens who volunteered their time to be involved in commune affairs. Without a financial incentive, such volunteerism in Cambodia is rare, but throughout the project many CMC members became active in their commune's affairs and regularly attended commune council meetings. An active and aware citizenry is an essential component of a healthy and robust local democracy, but is challenging in the Cambodian context as a consequence of strong cultural factors, including fear of change and a long legacy of top-down power relationships. To overcome this, LAAR focused on educating CMC members in relevant laws, policies and procedures, and developing basic communication, facilitation and advocacy skills. By doing this LAAR aimed to empower citizens with the knowledge, skills and confidence to engage commune councilors, other officials and their fellow citizens.

Over the course of the project the role of CMCs developed and changed. Initially envisaged as a 'monitoring' committee who oversaw commune council activities, CMCs evolved to take on much more of a partnering role with commune councils. In the last few years of the project the role of the CMC was commonly described as a 'bridge' between commune councils and citizens; taking issues from the community to the council, and reporting back to the community on council activities and decisions. Additionally CMCs became responsible for mobilizing citizens to participate in commune council activities, such as commune council monthly meetings.

LAAR provided training and ongoing technical assistance to CMCs throughout the project. In the early stages of the program CMCs received the same training as commune councilors. Later in the project a CMC toolkit was produced, based on successful CMC experiences, and all CMCs received training in this toolkit. In total LAAR distributed 5,000 copies of the CMC toolkit to CMC members, Provincial

Governments, Provincial Associations of Communes and Sangkats, partner NGOs and non-LAAR NGO partners. Developed in close consultation with active CMC members, the CMC toolkit provided real life examples and tips for how citizens could engage with local councilors in Cambodia. While the DAT team was critical of the toolkit, LAAR still believes that it is culturally relevant and was particularly useful to weaker CMCs and other community based groups who had little experience in civic affairs.

As noted in earlier in this report, towards the end of the project LAAR decided to focus attention on 'stronger CMCs' with a view to ensuring the sustainability of CMC functions where they were most likely to succeed. Strong CMCs were judged by LAAR to be those CMCs that understood their role clearly, regularly attend commune council meetings and took notes, collected issues from commune council meetings and followed up on issues, could mobilize other people to participate in commune council meetings and were actively involved in disseminating information to others. LAAR assisted these CMCs to regularly meet to discuss issues/strategies, develop networks with other civil society groups (including other CMCs in neighboring commune) and more formally share information from council meetings.

By the end of the program these stronger CMCs had started to develop their own networks and host CMC coordination meetings independently, indicating that LAAR's approach to supporting stronger CMCs was a good decision.

Further, to better understand the impact that LAAR was having using the CMC model, LAAR disaggregated the Second Citizen Satisfaction Survey dataset into citizens reporting to be CMC members and citizens who did not identify as CMC members. Of the 2,341 citizens surveyed 137 reported being a CMC member.

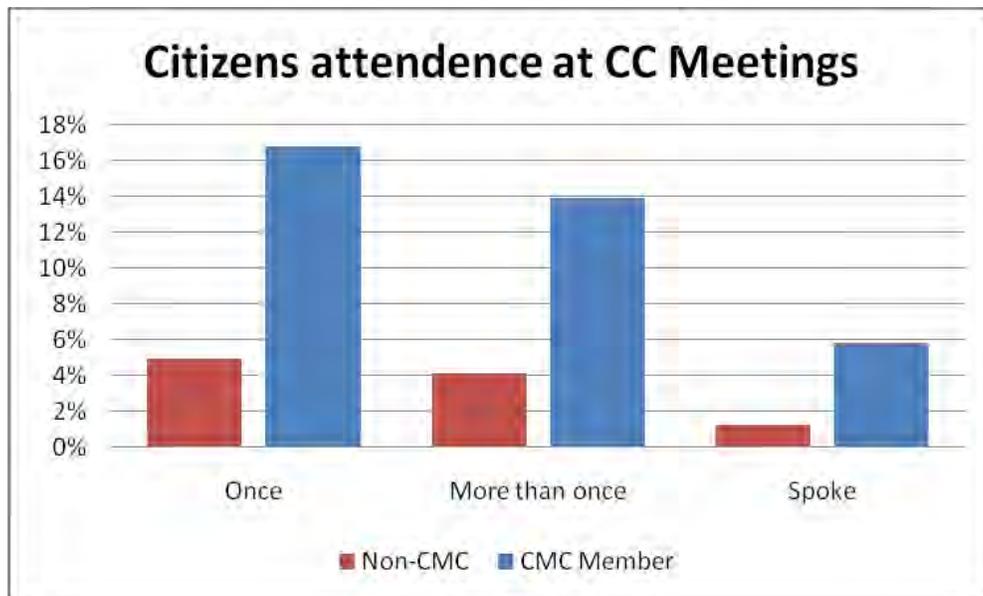
Compared to other citizens, CMC members were almost twice as likely as average citizens to be satisfied with the commune council's performance and know clearly about commune council activities. More specifically, CMC members reported:

- A higher frequency of attendance and participation at commune council meetings;
- Higher levels of satisfaction with council meetings;
- More frequently contacting local officials with issues;
- Better knowledge of their commune council and council activities;
- Greater ability to access information;
- Better knowledge of citizen rights and the fees for council services;
- Understanding that women and the disabled have special needs; and,
- More productive relationships between the council and community organizations.

Taken together, these findings suggest greater trust by CMCs of their commune councils, indicating stronger levels of social capital in the communes where they are established.

Although it was not statistically significant, CMC members were able to identify the most important feature of democracy, with more CMCs than average citizens identifying it as *the opportunity to change government officials via elections*. Other citizens more frequently associated democracy with access to human rights.

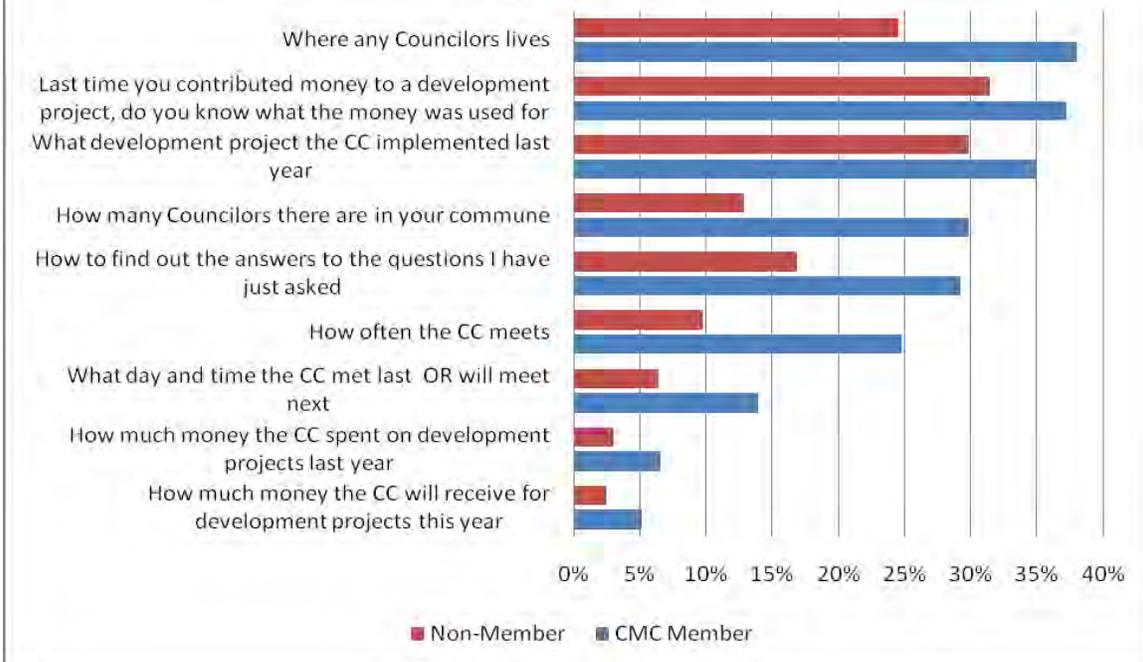
The differences between CMC members and average citizens are most likely a result of the training programs delivered and the coaching support provided by LAAR, and the ongoing technical support that CMC groups received to ensure that they were able and confident to participate more frequently in commune council activities.



Citizens strongly agree to statements about CC meetings



Citizens perception that they 'know for sure' about CC activities



Additionally, when commune councilors were asked if the council *always invite community organizations to council meetings* 91% of LAAR commune councilors *strongly agreed* compared to 74.1%

of non-LAAR commune councilors. Interestingly, 52% of LAAR councilors state they were members of a CMC. This finding is of particular interest to the LAAR program as CMCs were intended to be civil society groups that worked with and monitored the commune council. However, such a finding, coupled with the generally positive view of civil society groups expressed by commune councils in the survey, seems to indicate a close relationship between CMCs and commune councilors. This is a positive finding for CMCs as many commune councilors expressed distrust in the CMCs when they were initially introduced, likening them to an 'opposition' group. No doubt, this change in attitude can be partially attributed to the renaming of the groups from 'Community Monitoring Committees' to the less confrontational 'Community Mobilizing Committees' part way through the project and the positive relationships built between CMCs and councilors.

Thus, from the survey data it can be concluded that the CMC model is effective in increasing participation in commune council meetings, in ensuring an aware and engaged citizenry and in improving commune councilor perceptions of citizen groups, or to put it more concisely; the CMC model is having impact.

LAAR Recruitment Brochure for CMCs

Promoting Engagement Between Citizens and Commune Councils



Are you aware that as citizen you can help your local government to improve commune development?

Community Mobilizing Committee or CMC is a means for engaging citizens with the Commune Council for the success of local governance and commune development. It is an independent group of citizens who monitor and provide ongoing feedback to the Commune Council to ensure that the Commune Council is performing its duties in a transparent and accountable manner. The goals of the Community Mobilizing Committee are to:

- ▶ Observe and comment on commune-level governance
- ▶ Promote accountability, transparency, participation, and partnership with the Commune Council and the community
- ▶ Promote participation of community members, especially under-represented groups, in problem identification, project planning, and implementation of social development projects
- ▶ Engage citizens in active dialogue with the Commune Council

Members: Each commune has a Community Mobilizing Committee with 12 members. The members have interest and commitment to play an active role in village and commune development. CMC members are selected from among community civic activists, leaders of community-based organizations, youth (citizens aged 18-25), and representatives of ethnic, religious, and other minority groups. Both men and women should be represented in the CMC with at least 40% women. CMC members **must not be officials**. **Village chiefs, elected commune officials and political party officials cannot be members of the Community Mobilizing Committee.**

Roles: The Community Mobilizing Committee acts as a bridge between citizens and Commune Councils. It regularly observes the Commune Council's activities and provides the citizens' perspective and feedback to improve CC's performance. The committee helps Commune Councils to be aware of and responsive to the needs and interests of its citizens, especially under-represented groups. It provides opportunities for citizens to express their needs and interests to their Commune Councils.

Organization: CMC members commit to serve in a voluntary capacity for at least one year. Any member may serve up to two years. A chairperson and deputy chairperson coordinate the activities of the CMC. CMC meetings are held once every two months, and members attend the Commune Council meetings. Regular dialogues are held with the Commune Councils during ongoing monitoring.

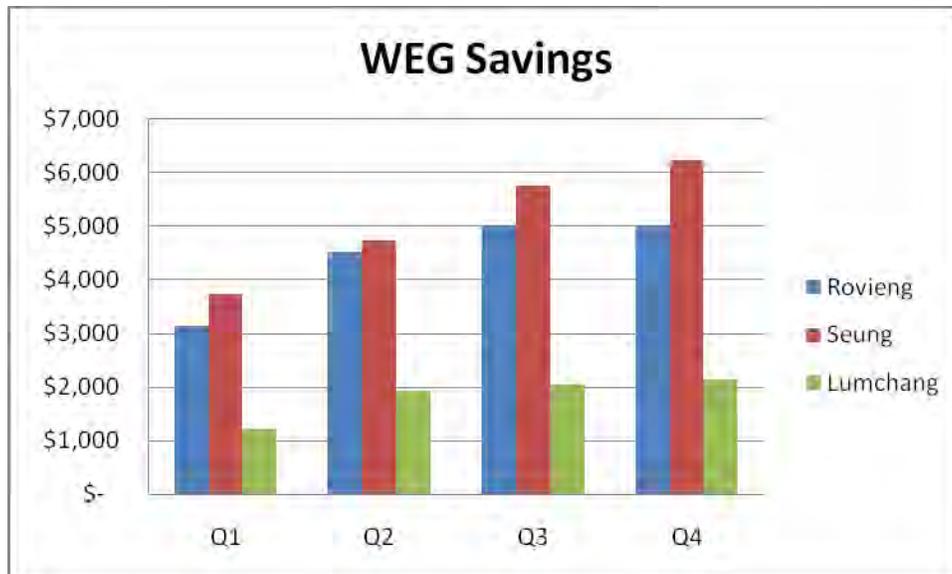
Capacity Building: LAAR helps CMC members to increase their ability to promote and monitor transparent and accountable local governance. While performing their roles, CMC members benefit from training opportunities provided by LAAR partners so that they gain the confidence and skills they need to work side by side with the Commune Councils. With these skills, the Community Mobilizing Committee can truly contribute to the success of local governance.

Women’s Empowerment Groups: Throughout the final half of the program, in response to a noted decline in female participation at commune council meetings and a frequent complaint that poor people had no incentive to participate in commune activities, LAAR piloted a project aimed at increasing the voice of poorer women in commune affairs. This pilot project was based on women’s empowerment program implemented by Pact in Cambodia and a number of other less developed countries called the WORTH program. The WORTH program model seeks to empower women through literacy, savings and micro-business skills. To this end, LAAR established 32 Women’s Empowerment Groups (WEG) comprised of 630 members in three communes in Takeo and linked them to the local CMC group, under a pilot project called ‘Worth for Civic Engagement Pilot Project’.

During regular WEG meetings, CMC and WEG members reviewed savings activities, developed literacy skills, organized loans for members and discussed community issues. The meetings also served to promote networking among women’s groups and CMCs so that CMCs could better articulate the needs of poorer women at commune council meetings. These savings groups provided an economic incentive for poorer women to become more active in their communities and develop the skills and confidence to become more engaged in civic affairs. As the groups were motivated by savings and business skills, LAAR believed that this model would provide a strong incentive for sustainability and the mainstreaming of poorer women’s issues into the commune council’s agenda.

In addition to supporting these regular meetings, LAAR also supported ‘mobile workshops’ with participation from WEG members, CMC representatives and local officials (including commune councilors). At these meetings the WEG members and CMC representatives were afforded the opportunity to discuss community issues with women from different villages and local authorities. These mobile workshops aimed to ensure that poorer women’s issues were put on the agenda at commune council meetings. As these meetings occurred on a monthly basis and the location was rotated to different villages, they also sought to assist in the development of networks of poorer women within a commune.

In total the WEG combined have saved over \$13,400 since their establishment in early 2009.



During the final quarter, LAAR completed an internal evaluation of the 'Worth for Civic Engagement Pilot Project', using a survey and focus groups, to better understand the pilot projects impact on the local community and assess its merits as a vehicle for enhancing the participation of poorer women in civic affairs.

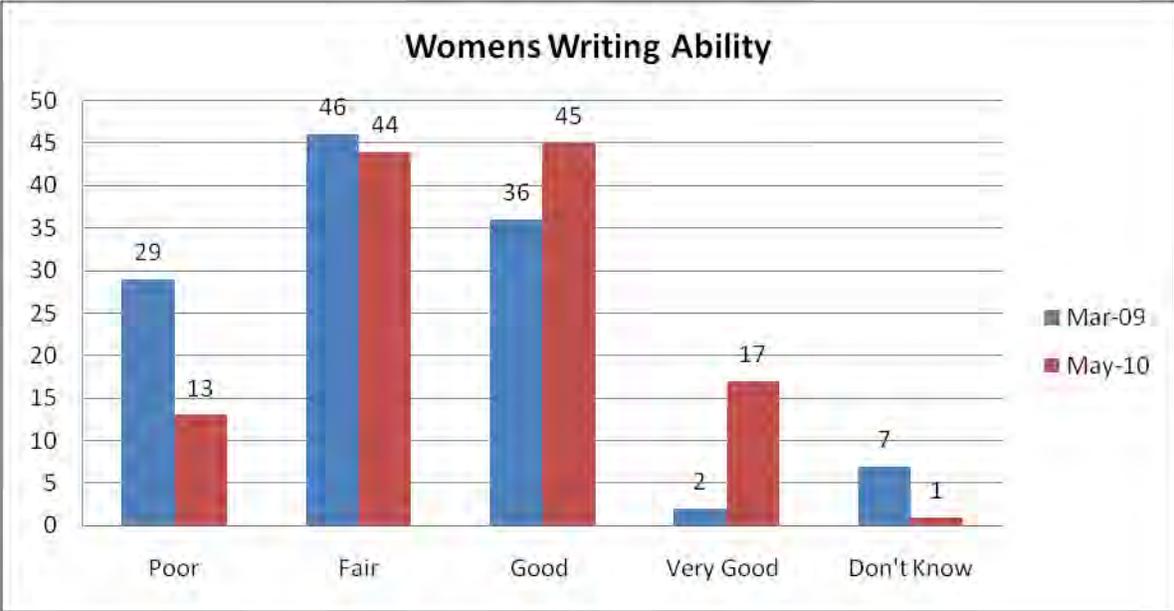
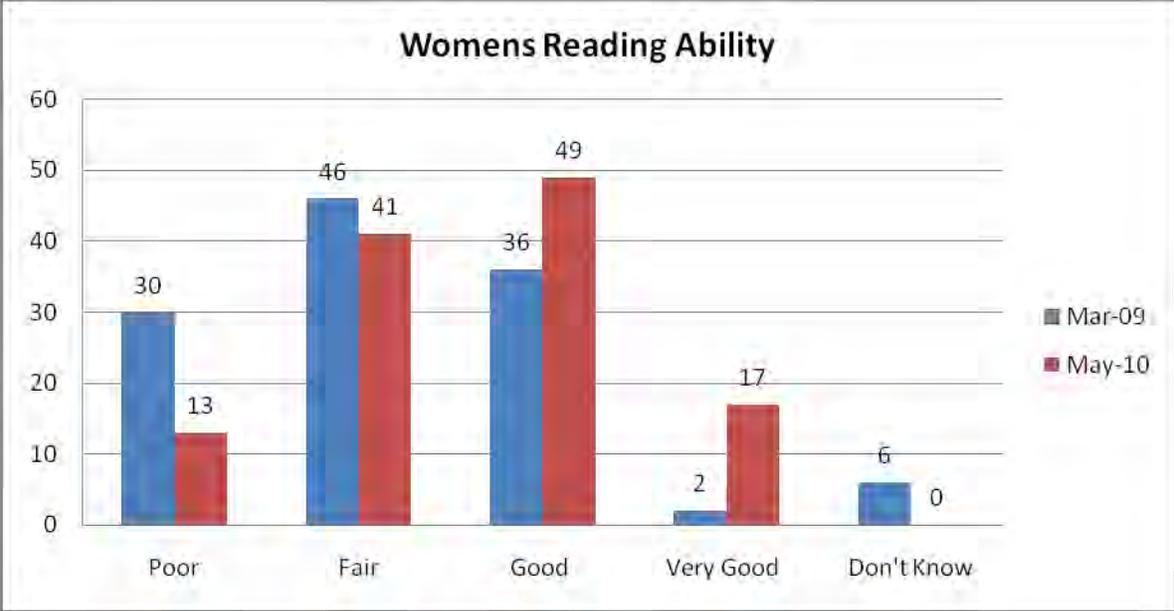
From this evaluation it was clear that the pilot project had had the desired results on the target populations: Participant reported feel more confident in their literacy skills, taking out loans from the savings groups and putting these loans to use for the benefit of their families. The project was also clearly translating into more active and confident women who were no longer afraid to engage with their local authorities.

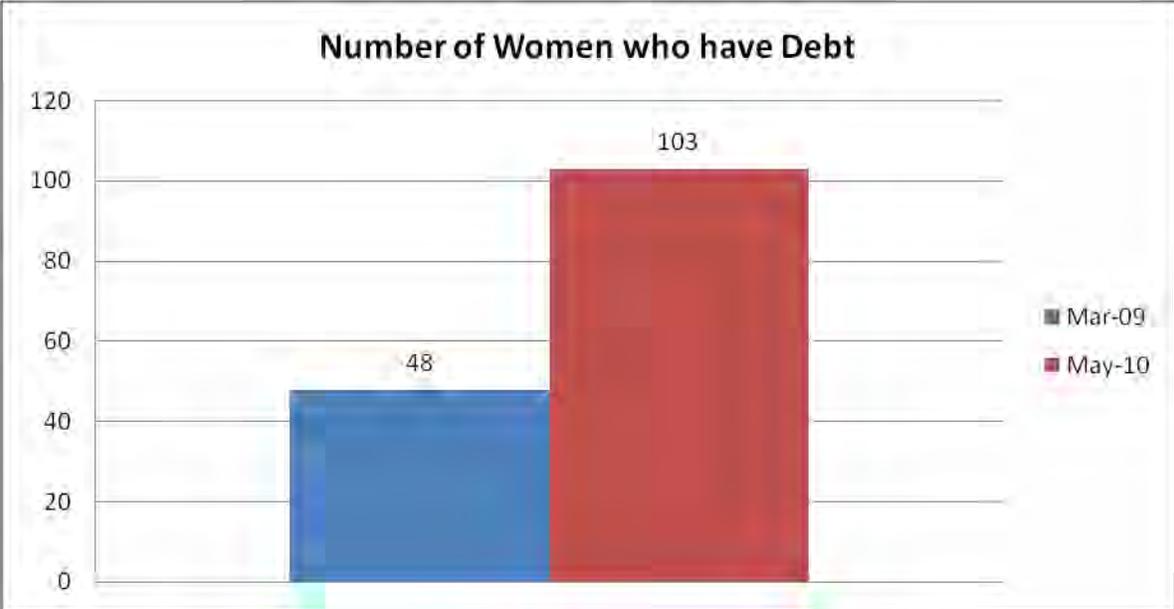
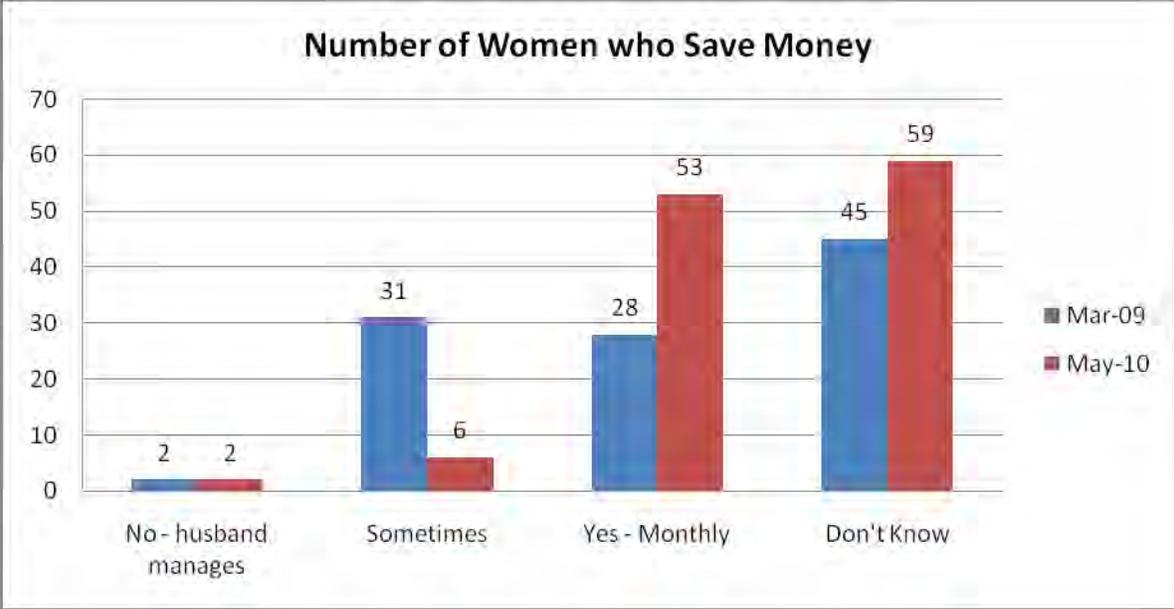
However the evaluation also found that, attention to commune council activities and savings activities appeared to be coming at the cost of time spent by women undertaking more traditional activities. Whether this is a good or a bad thing was not anticipated or explored by the evaluation.

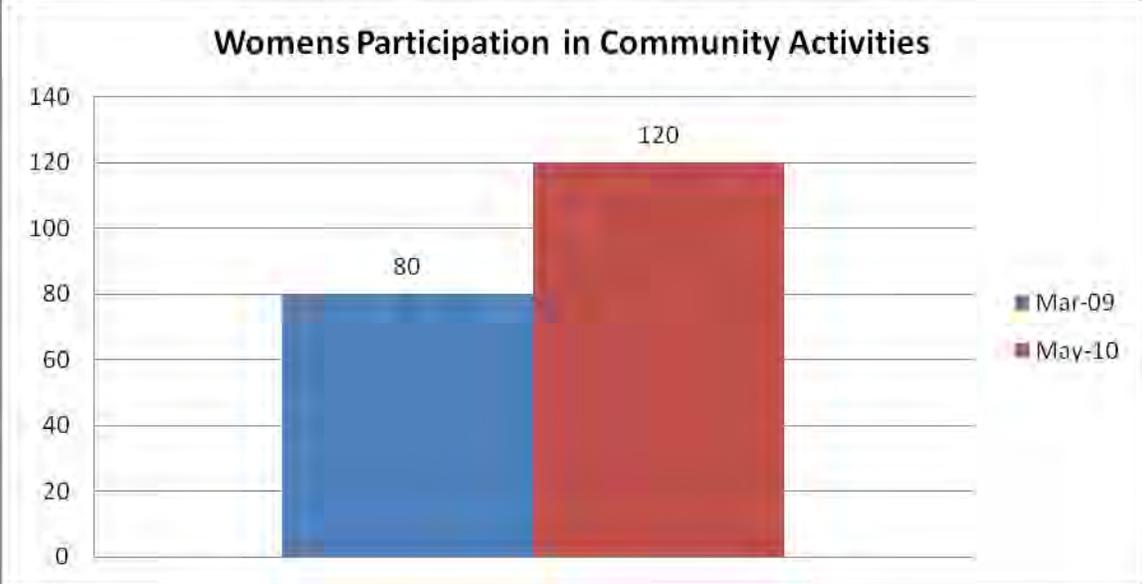
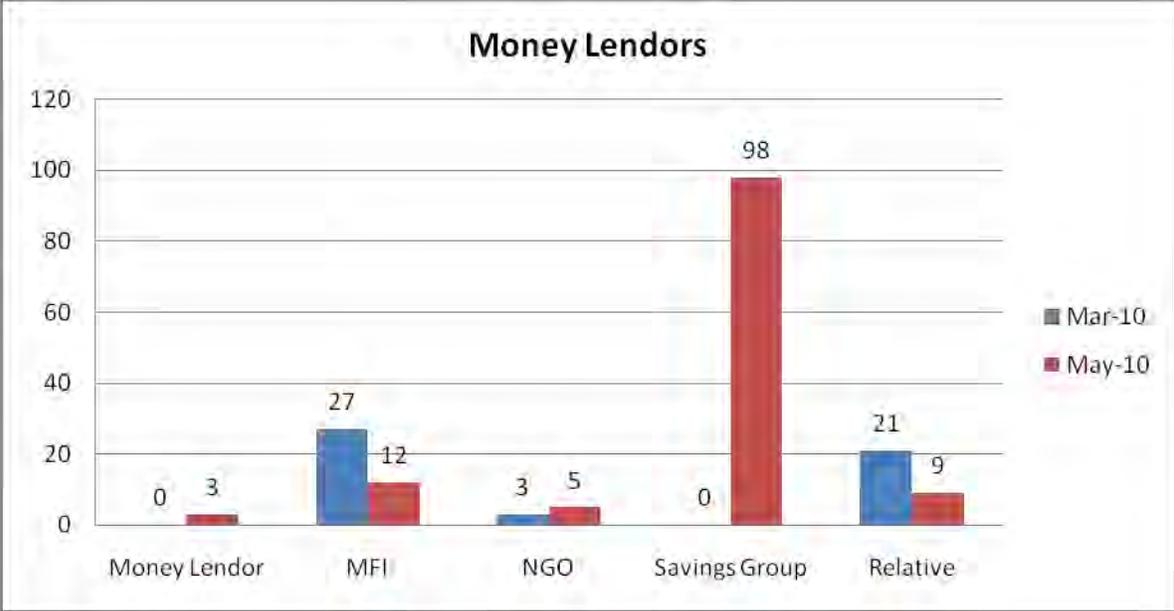
The evaluation team also thought it was dubious that more families now appear to be in debt as a result of the project. Although these debts are smaller in value and are more often to the savings groups where poorer women have a voice and, consequently, can potentially negotiate pay back rates and other rules of for the provision of loans.

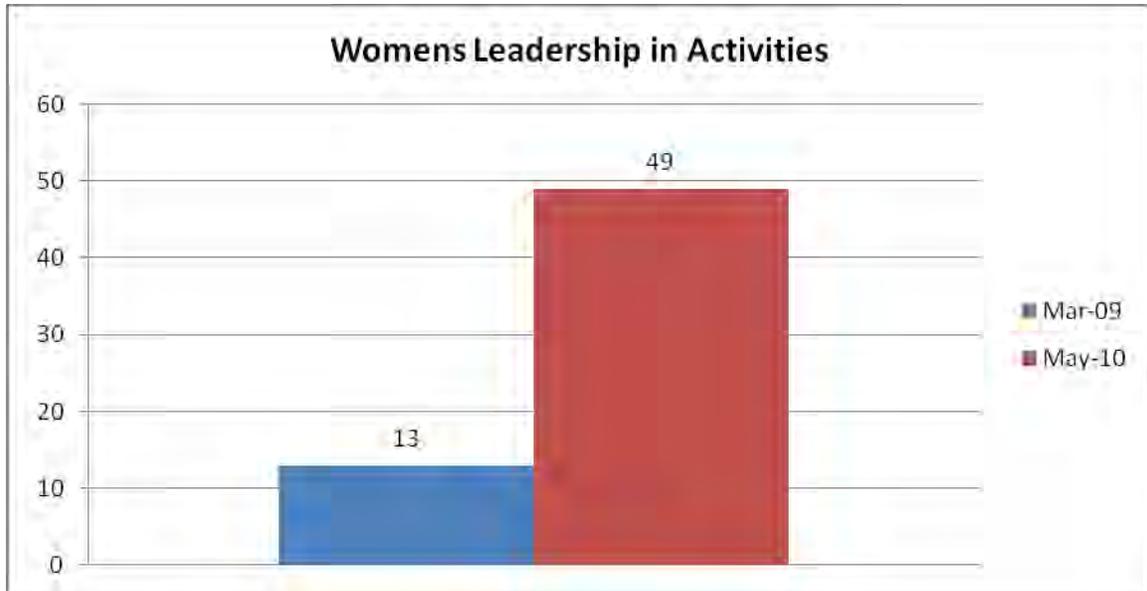
The diversity of activities that women appear to be able to undertake as a result of access to loans was seen as a positive by the evaluation team. This meant that women were undertaking activities, such as animal husbandry, which they could undertake at home close to their families, rather than working away from home in factories.

The evaluation team also felt that the large number of women 'do not know' if they are in debt or not may also be cause for concern, but suggested that this might simply reflect a reluctance to reveal personal information. To better understand this phenomenon would require further research.









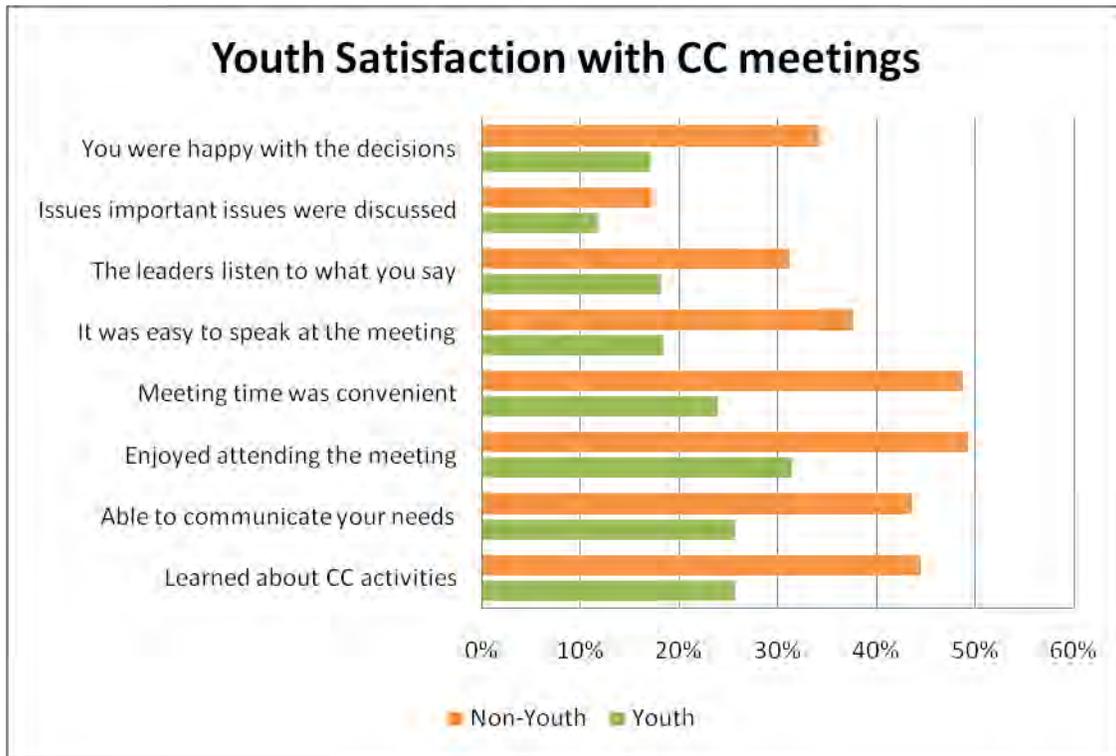
Youth Initiatives: In the second half of the project LAAR noted that more concerted efforts were required to engage youth in commune affairs. Consequently, LAAR experimented with forums, festivals and awareness raising events aimed at youth to see if this had any effect on youth involvement in commune council activities. Most of these activities were small in scale and isolated to specific communities.

As a result of one activity in Kampong Cham, 79 young people decided to join their local CMC, after participating in awareness raising events held across the province. By the end of LAAR these young people were regularly participating in monthly meetings and community forums and making their voices heard. For example, one young CMC member from Tropaing Preash commune requested that the commune council publicly announce the commune council meeting date and agenda in advance of the meeting and disseminate the council meeting minutes after the meeting to youth focused CBOs. While another young CMC member in Thmar Poun commune assisted in bringing other young people together to participate in a volley ball game and raise awareness of the negative effects of illicit drug use.

Given the small scale of these youth specific activities under the LAAR program, it was not possible to determine any impact using data from the Citizen Satisfaction Survey. However, from the survey LAAR noted some worrying trends regarding youth (defined as 18 to 25 year olds):

- Youth were less likely to participate in commune council meetings and activities;
- Youth were less satisfied with commune councils decisions and processes;
- Youth were less likely to contact commune officials;
- Youth believe less in the value of community organizations; and,
- Youth demonstrated less knowledge of the council’s role and activities.

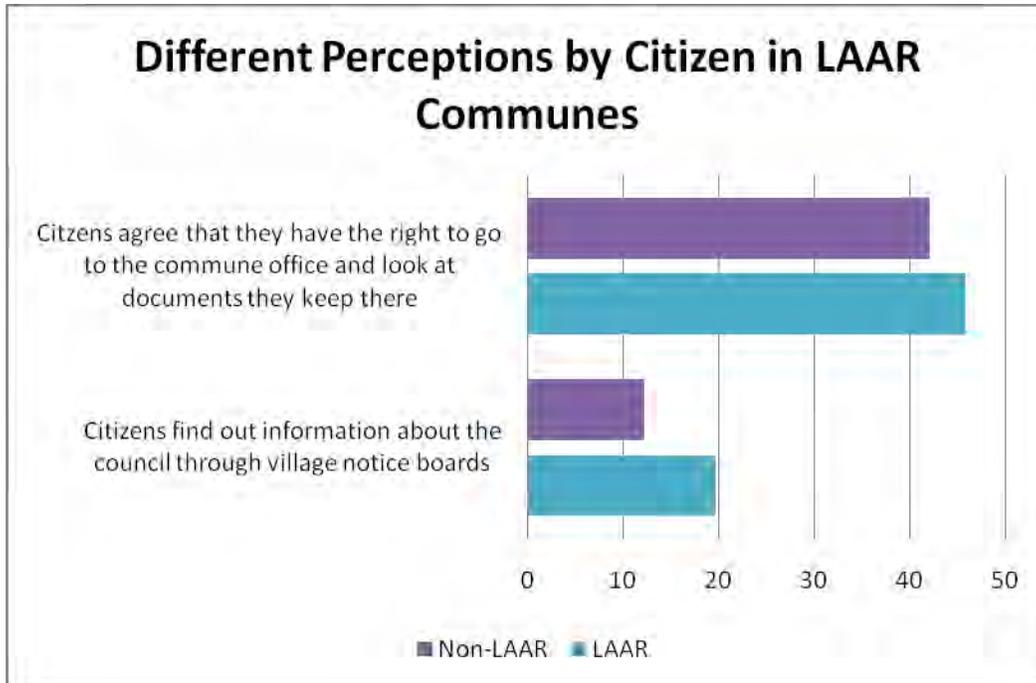
While in many ways these findings may be unsurprising, it does indicate that more work could be done to engage youth in civic affairs and commune council activities.



Activity Area 2: Assisting commune councils to broker services and establish partnership with service providers

Assisting commune councils to transparently procure services: Through SDPs, commune councilors were able to put their training and learning into practice. Given that transparency and accountability are key elements of LAAR’s good governance model, it was important to ensure that services for SDPs were being procured through a fair and transparent process. To ensure that this happened, LAAR assisted commune councils to prepare scopes of work, publicly advertise requests for tenders, receive applications, review and score applications, interview applicants, negotiate terms, prepare contracts and publicly announce the successful vendors.

LAAR tried to retrospectively assess the impact of this activity by reviewing the data from the Citizen Satisfaction Survey. From the survey data it was found that citizens in LAAR communes were significantly more likely to know what development projects their contributions were used for, to use village notice boards and know they have the right to personally inspect documents kept at the commune office. Additionally LAAR found that 4.1% of citizens in LAAR communes (compare to 1.5% for non-LAAR communes) knew for sure how much money the commune council spent on development projects last year. While the finding related to village notice boards is no doubt influenced by the fact that LAAR installed village level notice boards in LAAR villages at the beginning of the project, taken together the results indicate a positive trend for the idea of transparency at the core of this activity.



Assisting commune councils to develop partnerships: Another important aspect of the SDP model was that it offers commune councils the opportunity to build partnerships with local technical experts and/or government line departments who could assist commune councils to better tackle pressing social issues in their communes (both during the project and in the future), as well as deliver quality and responsive services through SDPs. Through SDPs commune councils were encouraged to reach out to other councils, line-departments, the private sector and NGOs to establish working relationships. Over the financial year 2010, 483 contracts had been signed with various service providers; 37% with government line departments, 33.5% with local NGOs/CBOs and 29.5% with the private sector.

In addition to assisting commune councils to develop partnerships with services providers, LAAR also assisted commune councils during the last two quarter of financial year 2010 to develop partnerships with other commune councils. LAAR worked with the Provincial Association of Communes and Sangkats and with the provincial administrations in order to promote peer-to-peer learning by commune councilors. Through this activity LAAR commune councils shared their experiences with non-treatment communes spreading the learning that they have acquired as a result of the LAAR program and discussing with neighboring commune councils common and/or cross-border issues. Such networking affords a great opportunity for sustaining and spreading program outcomes, and establishing inter-commune cooperation for bigger projects in the future.

From the Citizen Satisfaction Survey, there were three interesting findings related to partnership, which has implications for this type of activity.

Firstly, it was found that Cambodian citizen membership of civil society organizations is quite extensive; more than half of all citizens are members of at least one organization while councilors typically have leadership roles in one or two organizations and memberships in a further three (excluding political parties). This is much higher than previously thought by many observers and as indicated by the baseline

survey. Despite this high reported frequency of membership, activity is low; the average time stated since last attending a meeting was more than six months.

Secondly, it was found that citizens, including members of civil society organizations, as well as councilors report good cooperation between civil society and the councils. Councilors have mainly favorable views of civil society organizations and see them as partners with the council for development of the commune.

Lastly, it was found that other horizontal partnerships of the council seem to be quite limited in scope: councilors see their most important partners as being provincial technical departments rather than, for example, neighboring communes or the private sector.

Taken together, these findings indicate that more work could be done to facilitate the development of different types of partnerships to enhance local development. LAAR believes that as councils continue to self-fund and implement their own SDPs that these relationships will continue to develop and grow in importance.

Activity Area 3: Work with the Royal Government of Cambodia to adopt relevant reforms to facilitate the D&D process

Working with the Ministry of Interior to promote reform: Throughout the program LAAR worked with the Ministry of Interior to ensure ongoing support and cooperation from the Ministry to achieve programmatic goals, and to assist MOI to learn from LAAR's practical experiences in the field. Activities with the MOI included joint field visits with the Ministries technical staff, Executive Committee meetings with senior staff and the Minister, and reviews by MOI staff of LAAR publications.

During an Executive Committee meeting held between the Ministry of Interior, USAID, Pact and LAAR stakeholders, on March 2, 2010, at the Ministry of Interior, H.E. Prum Sokha, the Secretary of State of the Ministry of Interior stated that *"LAAR has been successful in helping change the behavior of people at the local level in order to enhance both the supply and demand of democracy, to understand the importance of non-infrastructure or social development projects and to ensure the practical implementation of good governance principles in accordance with the Government's Rectangular strategy"*. He added that he would like to see the continuation of these principles in some form, even if the LAAR program ended, and for USAID to maintain their commitment to this area. He also noted that LAAR was a *"laar"* (good) program and not just a *"saat"* (pretty) program, meaning that he viewed the program as being of high quality and having substance.

In the final stages of the program, it was important for LAAR to make a concerted effort to ensure that the lessons learned from LAAR were adopted by the government. To achieve this, in July 2010, LAAR in partner with the Directorate of Local Administration based in MOI organized a series of field visits for senior Government officials from the LAAR's Executive Committee to meet and talk with various local stakeholders, including commune councils, CMC members, Program to Support Decentralization and De-concentration (PSDD) advisors, Provincial Local Administration Unit (PLAU) officials, Provincial Treasury officials, line department's representatives, partner NGO staff and the Provincial Governors. These field

visits allowed officials to form opinions about the program through direct contact with participants with a view to influencing longer term policy and practices. Participating officials were from the Ministry of Economy and Finance, the National Treasury, the Ministry of Interior (including the NCDD Secretariat staff), the Ministry of Women's Affairs and the Ministry of Rural Development.

Additionally, during the last quarter of the program, LAAR successfully engaged both National League of Communes/Sangkats and the MOI/NCDD Secretariat's technical focal group in the documentation process of the Community Outreach Handbook, the Community Forum Handbook, the Commune Action and Effectiveness Process Guidebook and SDP technical packages. These key officials were involved in the drafting, field tested and co-editing these books. Following this process both the NLCS and the MOI agreed to official endorse the books, placing their insignia on the cover. With this official endorsement LAAR was able to publish and disseminate the books, with the assistance of the NLCS, to all the commune councils across Cambodia by the end of September 2010, in doing so spreading LAAR best practices and learning across the country.

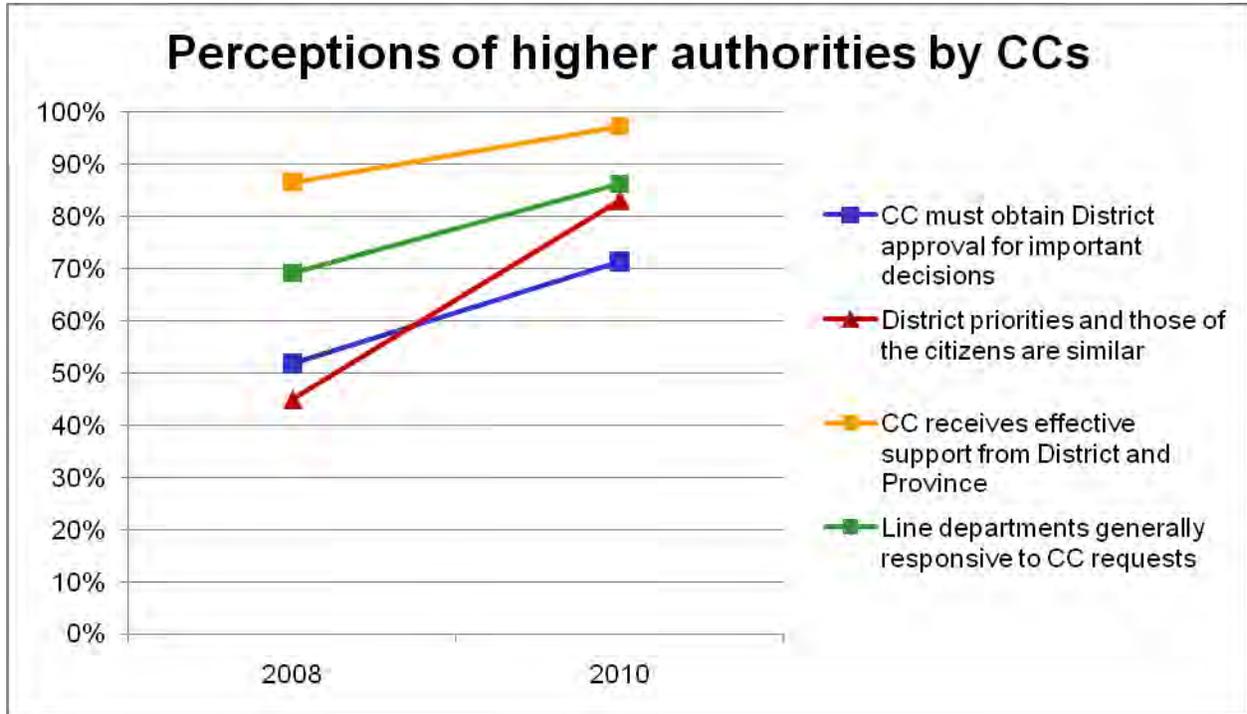
Working with district and provincial authorities to promote reform: During the program LAAR went to great lengths to ensure cooperation and coordination with district and provincial authorities, who oversee government support for commune councils. By developing these relationships LAAR aimed to ensure that commune councils were being properly supported and that relevant changes were adopted to better facilitate the development of commune government and local democratic practices. Towards the end of the program, LAAR put a greater focus on these relationships with a view to institutionalizing lessons learnt and sustaining program outcomes.

Specific activities implemented by LAAR with district and provincial authorities included annual provincial reflection workshops to reflect on experiences and lessons learned, the strengthening of provincial accountability working groups (PAWGs) and regular coordination meetings with technical staff. As a result of this work many provincial and district authorities came away with a positive view of LAAR and a commitment to maintaining the programs activities and outcomes.

On March 9, 2010, the Deputy Governor of Battambang, H.E. El Say, noted that *"LAAR has successfully contributed to establishing engagement and partnerships between stakeholders, civil society, local organizations and commune councils"* and that *"the relationship between commune councils and citizens are improving through community outreach"*. He requested that the Battambang Provincial Local Administration Unit and relevant government agencies continue supporting governance activities formulated under LAAR.

On March 12, 2010, the Chief of the Provincial Local Administration Unit in Takeo acknowledged the positive impact of community outreach in promoting responsive local government and building working relationships between commune councils and citizens. He recommended that all 48 commune councils that had received LAAR support in the province continue practicing community outreach and that the other 52 non-LAAR supported communes learn from the successful experiences of the LAAR communes. This is a considerable win for LAAR as it demonstrates a turn around by a person who for a long time had resisted the program.

Further, from the Citizen Satisfaction Survey it was found that the relationship between commune councils and higher authorities has improved since the baseline in 2008. Although there are other actors also working in this area, which no doubt has contributed to this improvement, LAAR believes that due to its large size this is in part attributable to work that LAAR has done in this area.



Coordination with the National League of Communes and Sangkats: The National League of Communes and Sangkats is the representative body of commune councilors, and as such is an important partner for the LAAR program. Throughout the project, LAAR worked with the nascent NLCS to share lessons and to gather insight into the program. At the end of the program LAAR included the NLCS in the development of legacy material including the development of a community outreach manual for commune councilors, a commune council self assessment process and a public forum guide. The President of the NLCS endorsed the LAAR handbooks and agreed to distribute the handbooks to all the commune councils across the country.

As a result of this partnership, on May 27, 2010, at a national meeting of NLCS in Rattanakiri, the President of the NLCS, Mr. Say Kasal, stated that LAAR had contributed significantly to the government’s decentralization reform with particular attention on sustainable engagement between the commune councils and the citizens, and acknowledged the progress made in sharing the LAAR community outreach model between LAAR and non-LAAR supported communes in Kampong Cham province. Mr. Say Kasal also said that the LAAR governance activities fit well with the NLCS mandate, especially its commitment to the capacity development of council members, and requested that the NLCS current donor, VNG-International and NLCS consider funding the continuation of key LAAR activities after the program had ended.

Working with development partners to assist the National Committee for Sub-National Democratic Development: The National Committee for Sub-national Democratic Development (NCDD) is the inter-ministerial mechanism for promoting democratic development through decentralization and de-concentration reforms throughout Cambodia. Throughout the program, LAAR has provided input to the NCDD on policy developments and the ten-year national plan for sub-national democratic development. Importantly, during the fourth quarter of financial year 2009, LAAR took a lead role in facilitating civil society’s feedback on the NCDD’s National Program for Support to Sub-National Democratic Development 2010-2019. LAAR also provided comments to the NCDD, through the collective comments submitted to the NCDD from development partners, on the *‘Draft Sub-Decree on Roles, Duties and Working Relationship of the Provincial Council and Board of Governors, Municipal Council and Board of Governors and District Council and Board of Governors’*, and participated in the NCDD’s Annual Work Plan and Budget workshop. Given the importance of these developments in influencing the overall D&D process being implemented by the RGC, these activities will have significant long lasting impact on good governance in Cambodia.

A view shared by the USAID mid-term evaluation team (May, 2009) which noted that *“LAAR has begun to produce useful policy shifts—acceptance of social development as an appropriate local planning goal, the 40 per cent matching fund requirement, and openness to revising the government project implementation manual—by national, provincial, and district officials.”*

Activity Area 4: Working with national civil society groups to better coordinate decentralization and de-concentration reform activities

National civil society leadership on decentralization and de-concentration issues: Over the course of the program, LAAR helped to establish and formalize the Working Group for Partnership in Decentralization (WGPD); a national-level coalition of civil society organizations and non-governmental organizations who aim to contribute to strengthening decentralization and democratic local governance by promoting partnerships among decentralization stakeholders at all levels, with emphasis on partnerships between commune councils and local civil society. To promote local leadership and sustainability of the WGPD, LAAR worked with the Commune Council Support Program (CCSP) and the NGO Liaison Office (NLO) based in the Ministry of Interior, to increase their capacity and solidify their roles, so that these organizations could more effectively engage in dialogue with the Government on D&D reform.

Key activities supported during the program period included:

- Support for the publication of the quarterly ‘D&D Bulletin’ and the dissemination of key decentralization and de-concentration reform material to civil society organizations. Throughout the program the D&D Bulletin remained an important information source on decentralization and de-concentration progress and reforms for the government, donors, commune councils and NGOs. The importance of this publication was recognized by other non-USAID donors including CAFOD, Oxfam, CONCERN and TROCAIRE, who co-funded its publication beyond the life of LAAR. Per quarter 50,000 copies of the D&D Bulletin were printed and distributed to government agencies, donors, NGOs, civil society networks and commune councils across 18 provinces.

- In partnership with CCSP and the NLO, support for quarterly meetings between civil society and the government through Directorate of Local Administration, in which civil society feedback was formerly presented to the Government. These meetings chaired by H.E. Leng Vy, and attended by representatives from NCDD member ministries and civil society representatives, were largely positive with the NCDD welcoming the feedback from civil society. This process was important, firstly because it established a precedent for more democratic practices in the development of important Government programs and, secondly, because it would shape how democratic practices are developed at the local level.
- The successful lobbying of the Government to include civil society representation on the Government's D&D Technical Working Group.
- Support for CCSP to take greater responsibility in organizing WGPD meetings and activities. As the LAAR program began to phase-out, LAAR continued to provide technical support to the WGPD and share lessons learned. Through capacity building of CCSP, LAAR worked to ensure that there was sufficient local leadership to ensure the sustainability of WGPD after LAAR had ended. As a result of LAAR's efforts, CCSP was taking a lead role in organizing monthly WGPD meetings and steering committee meetings by the end of the program.

Activity Area 5: Assisting commune councils to embed democratic process in commune council activities

Social Development Projects: As mentioned previously, SDPs were designed to offer commune councils an opportunity to 'learn by doing'. LAAR provided extensive training and rolling technical support for commune councils to consult the community and identify community priorities, develop proposals (with goals, objectives and activities), competitively procure services, develop monitoring and evaluation plans, implement projects, manage finances (through private bank accounts), prepare financial reports, monitor progress, close-out projects and evaluate the impact of SDPs. Through this supported learning process LAAR aimed to ensure that commune councils would institutionalize good practices that enhanced civic engagement.

During the last two quarters of financial year 2010, LAAR observed that a number of provincial authorities, commune councils and sangkat councils were keen to continue implementing SDPs; building on their experiences under LAAR to answer pressing social concerns in their communities after LAAR had ended. To assist with this, LAAR facilitated the handover of technical support responsibilities for SDPs to the Government's Provincial Local Administration Units, provincial facilitators and district facilitators. However, during this handover, LAAR noted different levels of commitment and willingness amongst provincial and district officials to take on these responsibilities. LAAR feels this was largely due to internal government incentive reforms that were occurring at the time. These reforms meant that many government staff were no longer receiving salary supplements to perform their jobs, and consequently many were finding work elsewhere to supplement their small government salaries.

Despite this by the end of the last quarter of project implementation, 196 LAAR target commune councils (55% of LAAR communes) had committed funds to continuing SDPs after LAAR had concluded.

On average the budget for these SDPs was four million riel per commune council. While this commitment of funds bodes well for the sustainability of SDP projects, it could potentially be undermined by a lack of support from district and provincial authorities. Further, LAAR feels if the timing of the internal government incentive scheme had been different, then there would have been greater commitment for the continuation of SDPs

Number of Communes Committed Fund for SDP 2010			
Province	LAAR Communes	# Commune Committed	Amount (Riel)
Battambang	72	72 (100%)	308,647,200
Pursat	49	47 (96%)	161,299,900
Kandal	23	-	-
Takeo	48	-	-
Svay Rieng	43	42 (97%)	211,039,000
Prey Veng	37	34 (92%)	118,824,900
Kampong Cham	46	8 (17%)	25,674,000
Kampong Thom	38	-	-
Total	356	203 (57%)	825,485,000

Additionally, during the last quarter of program implementation, LAAR finished compiling sector-specific ‘SDP technical packages’ to establish best practices for SDPs which, in the future, can be used by commune councils and other local stakeholders to implement more effective social development projects in response to common issues. The SDP technical packages were formulated from existing SDP experiences and were shared with commune councilors, community based organizations and government departments through the Government’s Project Implementation Manual (PIM), with the assistance of the Ministry of Interior and the National League of Communes and Sangkats.

According to the finding of the USAID evaluation team (May, 2009), SDPs have been effective mechanism for promoting development and creating new traditions of democracy:

- *“As a result of the SDPs, council members, citizens, and senior Royal Government of Cambodia (RGC) officials now accept social interventions as a legitimate element of commune development--a major success.”*
- *“The first generation of SDPs, which emphasized public information campaigns and persuasion, has helped to create new traditions of democratic accountability.”*

SDP Case Study: Prey Toteung Commune, Svay Rieng

Across the open green sweep of Prey Toteung commune, small ponds and bigger lakes that divide an otherwise continuous flow of rice paddies serve as a lifeline to this isolated community, where fish is not merely a source of protein, but a matter of survival. It is especially true for Prey Toteung’s countless impoverished families who can’t afford to buy meat at the market.

But several years ago when villagers began using electric fishing cords to catch more fish quickly—an illegal practice in Cambodia—the fish began vanishing at record rates, plunging the community into a serious social dilemma and potential catastrophe.

–The commune brought us roads and gave us canals,” said Py Saven, 37, chief of the commune’s conservation committee. –But no one paid

attention to the forests and fish. They just ignored social issues.”

Commune council members themselves admitted negligence in providing social services.

“Before 2006, we never had social development projects,” Commune Chief Sim Siew said. “We just informally addressed problems when they came up. We had no plan. We had no budget for this.”

That’s because, up until 2006, many commune councils still had little say in their own community development initiatives and process. Instead, directives and budgets dropped down from national to provincial level officials, who often inadequately fulfilled their role of providing technical support and empowering commune councils to make their own development decisions.

Recent government reform has changed this relationship so that provincial and district level officials are now more prone to following the Law on Commune/Sangkat Administration and Management, transferring power—and budget oversight—to commune councils to develop their communities as they see fit.

For the Prey Toteung Commune Council, that meant battling problems like illegal fishing. The problem was clear: how to feed families without completely depleting and irreparably damaging the commune’s fish supply. But solving the problem was more complicated. Slumbering beneath the surface of the problem was a bigger and more vexing social development challenge: hunger, and the desperate, defying acts that go hand-in-hand with empty bellies.

“The issue had to do with surviving, and having fish to eat,” Commune Chief Sim Siew said. “We had to figure out how to make this problem go away. We had to intervene.”

That intervention came by way of a Social Development Project, an integral part of Pact’s strengthening local governance project in which commune councils methodically approach a problem and develop a plan for solving it. With technical and financial support from USAID and technical support from Pact, Prey Toteung is one of 356 communes across eight provinces in the country that has been able to broaden its traditionally narrow view of development as building infrastructure to not only include but prioritize social development aimed at building a better society.

In support of the government’s decentralization efforts, Pact, backed by USAID, provides matching grants of up to 60 per cent to communes like Prey Toteung, which set aside 40 per cent of their own discretionary budget toward solving social issues. Technical support from Pact’s local non-governmental partner help guide communes through the process for creating and carrying out social development projects.

In Prey Toteung, illegal fishing was among one of the first two major social issues the council decided to take on in 2007—a problem identified during outreach activities including village meetings and door-to-door house calls to survey villagers about their major concerns. Among the commune’s 12 villages, illegal fishing and health and sanitation emerged as top concerns.

With clear direction from villagers, the council then formally included the problem into its annual Community Investment Program (CIP). It immediately organized a Community Natural Fish Conservation Committee, whose elected members were volunteer villagers trained in natural resource management and tasked with monitoring illegal fishing within their own villages. The council also initiated an awareness campaign to educate the public about the devastating impacts of illegal fishing, and trained 60 of the commune’s poorest villagers in how to farm fish. In addition, council members hosted a community event to release fingerlings into local waterways in an effort to revitalize the diminished fish stock in ponds and lakes.

Since 2007, reported cases of illegal fishing has decreased by 85 per cent, according to the Prey Toteung commune council clerk, whose carefully tracked data from village chiefs and the conservation committee are stored and organized in three-ring binders in the commune chief’s office.

Villagers are noticing real change.

Pheng Seurng, 56, says she’s seen many improvements in her community over the past four years. There are fewer cases of domestic violence, more kids are staying in school, and children are growing up in a safe, clean environment. She also sees the commune council’s pilot project to train some of the neediest families in fish farming—including providing a start-up supply of fingerlings—as an effective means for alleviating poverty.

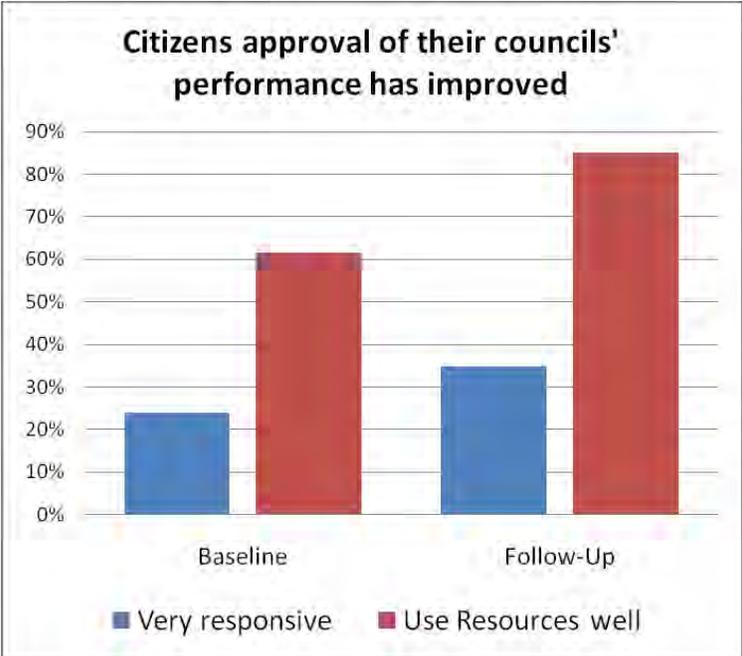
“It’s not for NGOs to come and rescue us and feed us,” Pheng said. “It’s for us to find our own solutions to poverty. The commune council gives us fish so we can learn to feed ourselves and solve our own poverty.”

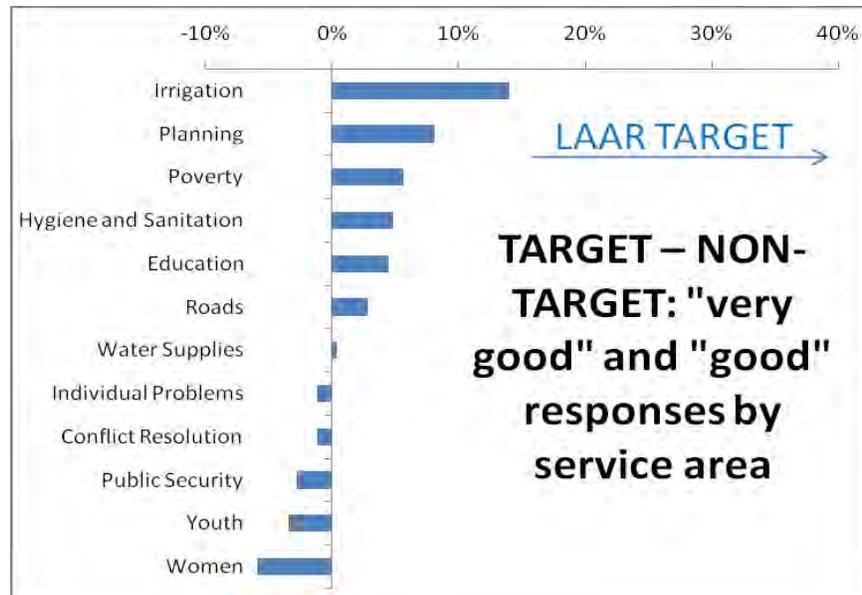
Capacity building of commune councils: At the start of the program LAAR provided training to commune councils using the four training modules developed by LAAR. Following training, commune

councils received ongoing technical assistance from LAAR to undertake their daily functions, especially in the areas of financial management and community outreach. Through these capacity building efforts LAAR aimed to ensure that commune councils were capable of fulfilling their mandates under Cambodian law and institutionalize good governance practices that enhanced civic engagement.

In total of 3,164 commune council members (2,742 male & 422 female) received capacity building support from LAAR.

Although the Citizen Satisfaction Survey was not specifically designed to capture information about the impact of capacity building for commune councils, it is clear from the survey that LAAR communes have measurably better perceptions of their commune councils and that councilors in LAAR communes express measurably more positive views of good governance principles, than do their counterparts in non-target communes.





This view is further supported by the independent USAID evaluation (May, 2009) which noted that *“LAAR CCs are different from non-LAAR CCs—more conscious about participation and accountability, more aware of social issues, and more confident they can serve citizens and deal with officials and NGOs”* and the most significant change stories selected by program beneficiaries which highlighted the confidence and skills derived from these activities as a positive outcome for the community as a result of the program. According to Mr. Sok Chhoeut, a councilor for Maung commune *“With LAAR Program, Pact Cambodia has funds to support activities, and we also have staff of other partner NGOs to provide orientations, resources and experiences to make us gradually skillful in our work from year to year.”* Lastly this view is also supported by focus group study findings which noted a marked difference in LAAR target commune councilors understanding of good governance compared to non-LAAR commune councilors, and their ability to tie the concepts to actions.

Public Forums: After piloting the concept in 20 communes across five provinces in mid-2009, LAAR assisted with the implementation of community forums across all eight LAAR provinces. These forums were designed to offer an opportunity for local citizens to engage commune councilors on issues affecting their commune. Announced in advanced through village chiefs, community mobilizing committees and community notice boards, these forums gave citizens the opportunity to directly question their local representatives and forge a larger democratic space. As such, they were an important mechanism in promoting transparency, accountability and responsiveness in local government. These events also aimed to build trust and partnership between citizens and commune councilors for the development of their own communities.

Issues discussed during the forums were wide and varied, ranging from students drop-out rates, crime, domestic violence, land disputes and civic rights to road maintenance, waste management, forest preservation and farming issues.

In total LAAR supported 658 forums with 52,128 participants (41.07% of whom were female). As a consequence of these forums, LAAR commune councils reported improvements in their relationships

with citizens and the ability to resolve community issues more effectively. Additionally, in the last quarter of LAAR, when LAAR had ceased funding for community forums, LAAR noted that a number of communes continued to host their own events using their experiences developed under LAAR.

At the end of the project LAAR also produced a manual based on the best practices identified during program implementation that was endorsed by MOI and the NLCS and was disseminated to all the commune councils around the country.

SDP Case Study: Public Forum

Trapaing Thom Khangcheung commune, Tramkak district, Takeo province—For years, Commune Chief Chhay Nheng in Trapaing Thom Khangcheung commune, carried out development projects with little citizen involvement. If provincial authorities decided Trapaing Thom Khangcheung needed a new road, canal, water well or school, they would send Nheng a directive, and he would carry out.

The 47-year-old chief didn't mind this style of a non-inclusive development process. It meant the shy chief didn't have to face his villagers.

Still, he knew something was missing.

—Before, it was up to the provincial officials to tell us what would be developed. We didn't have a say and it didn't often match what we needed locally," Nheng said.

Nheng realized he would never know what was needed locally if he didn't inform and engage his constituents. He also knew serious social issues plagued his commune—from domestic violence to gang problems—and he needed a way to solve those problems.

In an effort to change the status quo and catalyze community participation, Nheng held his first official public forum as part of Pact's Local Administration and Reform program to strengthen local government. With guidance from Pact's local non-governmental partner, Nheng mobilized his 10 fellow commune council members to prepare for the event. The council picked a date and place, created an agenda and selected speakers and facilitators. They also brainstormed how to format the forum to optimize their goal of citizen engagement. Eventually, they settled on a panel of speakers followed by break-out group sessions to ensure everyone had a chance to give input. Invitations targeting village representatives were disseminated to village chiefs and members of the Commune Mobilizing Committee (CMC), a group of volunteer villagers who serve as a bridge between the commune council and the people.

Anticipating questions regarding the commune's budget, Nheng worked with the clerk to prepare the budget and break it down by sector.

Even with a plan in hand, the thought of facing citizens and, for the first time, having the public spotlight turned on Nheng, terrified him.

—I was really scared that people would say things in public in front of all these people and embarrass me," Nheng admitted. —I was so scared!"

Nheng said he was worried about sharing his commune's budget. There were serious gaps. Line items didn't match expenditures. Funds were unaccounted for.

—People asked the most questions about the budget, how money was spent," Nheng said.

At the forum, he also directed to public officials from various sectors in police, education and health to explain their own progress.

At the first meeting, Nheng was surprised to see so many people eager for their chance to stand up and speak into a microphone.

—It was clear to me, people wanted to be involved," Nheng said. —They just never had this kind of opportunity."

Nheng learned important lessons from carrying out the first public forum. While outreach activities at the village level helped him and fellow councilors understand issues affecting their community, the forum was a tool for solving those problems collectively.

Among the major social issues was domestic violence. Raised at the public forum, citizens wanted to know why police took so long to intervene. Meanwhile, police described their challenges in dealing with domestic violence cases. Commune council members mediated and devised a plan for police officers to contact commune council members and village chiefs in the future as a way of improving coordination in response to domestic violence incidences.

—Now, domestic violence cases have decreased," Path Sun, a commune council member responsible for tracking such cases. The number of reported cases has progressively declined from 14 in 2007 to six in 2010.

In another example, village representatives attending the forum raised concerns of gambling leading to a deterioration of their communities. The commune council took immediate action, mobilizing village chiefs to address the problem and forming a citizens committee to raise awareness through village-level outreach activities.

Buoyed by the potential for public forums to help transform his village by solving social ills, Nheng took lessons learned from each forum to build on the next one, making them better and more effective. He worked on training facilitators to tease out participation by more quiet forum participants; relocated speakers to broadcast the forums at markets and other public spaces; and conducted outreach to villages before creating an agenda for community input.

Because some problems go beyond the commune's borders, Nheng plans to involve line department officials in a future public forum. That way, broader issues that can't be solved at the commune level, such as big trucks creating potholes in public highways that cut through the commune, can be explored and solved.

Citizens say public forums have helped villagers work alongside their elected council representatives to create positive change.

–Before, we never had a way to solve problems,” said Um Tim, a CMC and member of the conservation committee from On Trow village. –Conservation were big issues. We had domestic violence issues, gang issues. We had these problems but we didn't know how to solve them.”

Villagers are also pleased with the new level of responsiveness from their council, especially the commune council chief.

–When we raise a problem, within two days, he issues a directive,” Um Tim said. –He would assign the problem to the correct sector and delegate appropriate officials to solve it.”

Without public forums, villagers say progress would stall.

–There would be no sustainable development, because there would be no citizen participation, no relationship, no accountability, no transparency,” said Keo Dara, a CMC member from Bak Bunkor village.

But Nheing, recognizing the importance and effectiveness of public forums, intends to continue them, even as Pact's good governance program ends. He has already set aside 300,000 riels (roughly \$75) in from his 2011 commune budget for public forums.

–These public forums have really helped us so much,” Nheng said. –People take initiative, and are not just waiting for us to solve their problems for them. We are doing it together.”

Female Councilor Forums: LAAR, in partnership with the German Agency for Technical Assistance's (GTZ) Administrative Reform and Decentralization Program (ARDP) and Oxfam Great Britain, supported Women for Prosperity (WfP) to provide technical assistance to female councilors involved in organizing and hosting Female Councilor Forums across all of Cambodia. During these forums female councilors discussed experiences, identified solutions to common problems and prepared action plans for furthering women's issues in their provinces. The aim of these forums was to increase the capacity of female councilors to ensure that they could more effectively represent women's issues in commune council affairs.

At the end of the project, WfP provided technical assistance to the Government's provincial and district facilitators to take over and fund the Female Councilor Forums with a view to ensuring ongoing support for women councilors.

In March 2010, LAAR co-organized a national round table meeting with WfP and the Ministry of Interior, to discuss a handover of responsibility for Female Councilor Forums to national and sub-national administrations. H.E. Chou Bun Eng, Secretary of State for the Ministry of Interior, and H.E. Khim Chamroeun, Secretary of State for the Ministry of Women's Affairs, co-chaired the meeting which was attended by 121 participants (77 females) from both national and sub-national government. During the

meeting H.E. Mrs. Chou Bun Eng acknowledged the achievements of female councilor networks and advised the provincial authorities to take over responsibilities from WfP.

With the Government now taking responsibility for these forums, the sustainability of this activity is ensured. Female councilors will continue to meet, develop their skills and discuss common issues, thus ensuring that they better fulfill their role and forward women’s issues at the local level.

Commune Council Networking: In the later stages of the project, LAAR provided technical support to commune councils to conduct inter-commune meetings to discuss and find solutions to cross-border issues and to share experiences in dealing with common problems. The aim of these events was to establish stronger ties between commune councils that they can draw on to solve common problems and cross-border issues that would be difficult to tackle alone.

From the Citizen Satisfaction Survey results in June 2010, there was clearly room for more work in this area as only 31% of councilors see partnerships with other commune councils as important (additionally only 19% see partnerships with the private sector as important). That said, from LAAR experiences, this is an improvement as many commune councils had not even thought to network with their peers before the LAAR program. An example of how such networking can result in a positive outcome can be seen in the actions taken by Trapaing Thom Khang Chueng and Osaray in Takeo province. In May 2010, with the support of LAAR, the commune councils of Trapaing Thom Khang Chueng and Osaray met to discuss problems they were having with over-loaded sand trucks damaging local roads. To solve the problem the councils decided to put in bollards along sections of the road to prevent larger trucks (which are causing the most damage) passing along the road and establishing a toll booth to collect money from smaller trucks ferrying sand. The toll booth was overseen by a committee made up of members from both communes who then allocated funds to road maintenance.

Community Outreach: In the first year of working with the LAAR program, commune councils received community outreach grants which they could use to fund meetings with special interest groups, villages and individuals. Commune councilors were then encouraged to use the information acquired during these meetings to create the commune investment planning process. It was also a requirement of SDP co-funding that commune councilors undertake community outreach before designing a project. After the first round of funding from LAAR, commune councils were encouraged to find alternative, low-cost and zero cost funding arrangements for community outreach activities, so that they could continue conducting community outreach without the support of LAAR.

Over the last year of the program, LAAR worked in partnership with Provincial Local Administration Units and the Provincial Associations of Communes and Sangkats to support commune councils to continue community outreach. During this period LAAR observed that 83% of LAAR commune councils had committed funds to community outreach as part of their commune investment plan. This was a strong indication that community outreach was valued by commune councils and that it will be sustainable into the future.

Number of Communes Committed Fund for Outreach 2010			
Province	# target communes	# self funding outreach	Amount (riel)

Battambang	72	72 (100%)	105,520,700
Pursat	49	49 (100%)	69,598,600
Kandal	23	23 (100%)	14,056,000
Takeo	48	48 (100%)	10,445,000
Svay Rieng	43	43 (100%)	30,625,500
Prey Veng	37	24 (65%)	10,040,000
Kampong Cham	46	21 (46%)	9,029,000
Kampong Thom	38	16 (42%)	9,496,000
Total	356	296 (83%)	258,810,800

From the Citizen Satisfaction Survey it was noted that councilors in LAAR communes were significantly more likely to value speaking one-on-one with citizens as a means of obtaining information about the situation in their communes (33% compared to 18% in non-LAAR communes), indicating that they value outreach more than non-LAAR communes.

The usefulness of community outreach was also noted by the USAID evaluation team (May, 2009), who noted: *“Introduction of outreach activities in 2007 became a major success factor in LAAR capacity building. These activities and the learning they entailed are greatly valued by CC members.”*

At the end of the program LAAR also produced a Community Outreach Guide that was shared with MOI and the NLCS for dissemination.

Community Outreach Case Study: Trapeang Chong commune, Pursat

Trapeang Chong commune, Bakan district, Pursat province—Just a few meters off of a deeply rutted, red dirt road, 11 kilometers from Trapeang Chong commune town center, Kol Samoeun spends an idle afternoon rocking in a hammock beneath her family’s simple, wooden home. She is 29 years old, the eldest of seven children in her family, the daughter of rice farmers. The family lives in the isolated village of Preah Chombok, surrounded by endless hectares of lush and verdant rice paddies.

Far from the bustle of a bigger town, and deterred by broken, bone-rattling roads, it would be easy to ignore the people of Preah Chombok. Not many visitors would go out of their way to come here, except for one: the chief of Trapeang Chong commune.

Samoeun has never seen him, not because the commune chief has never visited, but because she is blind. “I can’t tell you what he looks like, but I can tell you his name,” Samoeun said. “His name is Em Samin. Ask anyone in the village, and they will know him. He comes here all the time.”

From village to village in Trapeang Chong commune, citizens know by face and name the man they elected into office, first in 2002 and again for a second term in 2007. That is because Samin makes a point to spend more time in the villages among his constituents—even the furthest village, Preah Chombok—than inside his office. And he makes these regular village visits more than a personal prerogative; Samin requires his fellow commune council members do the same. He believes that good governance hinges on community engagement, and that outreach activities are a quintessential cornerstone to community participation.

Samín’s biggest fear, he said, is that he or other councilors become what Prime Minister Hun Sen called, “the public official with 10 legs,” referring to public servants who remain anchored in their offices at a desk with four legs, a chair with another four legs, and the official’s own two legs, comprising a total of 10. Other council members share their concern.

“We have to use our two legs and go out in order to know the issues,” said commune council member Pich Srey Phal. “Outreach activities put us in direct contact with citizens. People don’t have the time or the money to come and meet us at the commune

council hall, and maybe they are scared. So, we have to go to them.”

As part of Pact’s LAAR program, outreach activities are one of the mechanisms communes have effectively used to connect with the citizens who voted them into office. The multi-level objectives of outreach activities include spurring participation among villagers, strengthening relationship between villagers and their commune council and keeping the citizens informed of and engaged in community development decisions. And in places like Trapeang Chong, these activities have led to major social change.

Samin recognizes that an informed and active citizenry is the only route to successful and sustainable development. Without buy-in from the community, there will be limited or no progress, and buy-in requires taking the time to reach out and mobilize the community.

For Samin and his council of 11, that translates into regular visits to the villages each year, with at least one formal outreach activity in each of the commune’s 20 villages per year, as well as eight public forums annually that bring the villages together to solve bigger social issues. Trapeang Chong commune council spent 2 million riels (roughly \$500) on outreach activities in 2010—one of the highest allocations for Pact-supported communes. Samin has already set aside funds in the 2011 budget to continue these activities when Pact’s good governance program ends.

The activities include village meetings and door-to-door visits to ask citizens directly, at their own homes, what they see as major concerns affecting their families and their community. Council members use the information to help prioritize social development projects.

During one door-to-door visit, Councilor Srey Phal once encountered a family impacted by HIV and AIDS. Path Kunthea, 18, has been the breadwinner of her family ever since her parents died a year apart of AIDS. While walking through the village to meet and talk with citizens, Srey Phal found Kunthea and her two brothers living in hunger and shame. The councilor took the matter to the commune council, which immediately responded, providing emergency funds for the children to buy food and pay for school. Later, the commune coordinated donations of a bicycle as well as wood to rebuild the decaying family home.

“I didn’t know it was the commune’s job to take care of me,” Kunthea said. “I would have a lot different life if the commune didn’t support me and my siblings. I feel like we can depend on the commune.”

Commune council members say being out in the community helps build better relationships between the councilors and the people they serve. It is also an opportunity for the councilors to help citizens understand what they do and encourage citizen participation in development decisions.

Citizens of Trapeang Chong commune, generally distrustful and fearful of people in positions of power, said they were happy to see their commune council representatives walking in their villages and talking to people. Outreach activities engendered trust that didn’t exist before.

“If the council members come to my home, I’m not afraid of them. I dare ask them for things we need in the village and tell them our problems because they’re in my village, in my home,” said Kim Thea, 43, a small shop owner. “But if I go to the Commune Council hall, I’m scared. I don’t know what they do and I don’t feel I should be there. The fact that they make the effort to come to us makes us trust them more.”

Thea said she has noticed major changes in the past four years in her community. Domestic violence has decreased, fewer people are living in abject poverty, the problem of gangs has subsided, and the overall health and hygiene of the community has improved—issues that surfaced while council members conducted outreach, and which the commune council later addressed through social development projects.

In Trapeang Chong, outreach activities have been so successful that the commune has become a model for other communities to follow. Trapeang Chong was chosen as the site for a study tour in which commune chiefs and councilors from eight neighboring communes in Pursat province visited during a knowledge-sharing workshop in which Samin and fellow councilors passed on their knowledge and experiences.

Other commune chiefs who participated in the study tour learned Trapeang Chong’s strategy of setting village meeting times for when villagers—mostly rice farmers who spend their days in the paddies and come home for lunch—would be home and

available to meet, such as during lunch hour.

Not only are citizens engaged during outreach activities in Trapeang Chong, but they are also active, Samin said—a sign that he and his councilors are succeeding in creating participatory commune development.

These days, commune council members like Srey Phal no longer measure their community's success in the number of road improvement projects or toilets built. Srey Phal measures progress in less tangible but simpler terms: whether her constituents are happy.

—When we received instructions from higher levels, we just did what they said. We didn't use our brains to think," Srey Phal said. —But now, we meet the people and ask them what they need. We have to think, "What is the right thing for the people?" Are the people satisfied? That's our biggest success, when the people are happy and satisfied."

Notice boards: LAAR implemented 2,260 village notice boards at the start of the program and encouraged their upkeep as a means of disseminating information and improving commune council transparency.

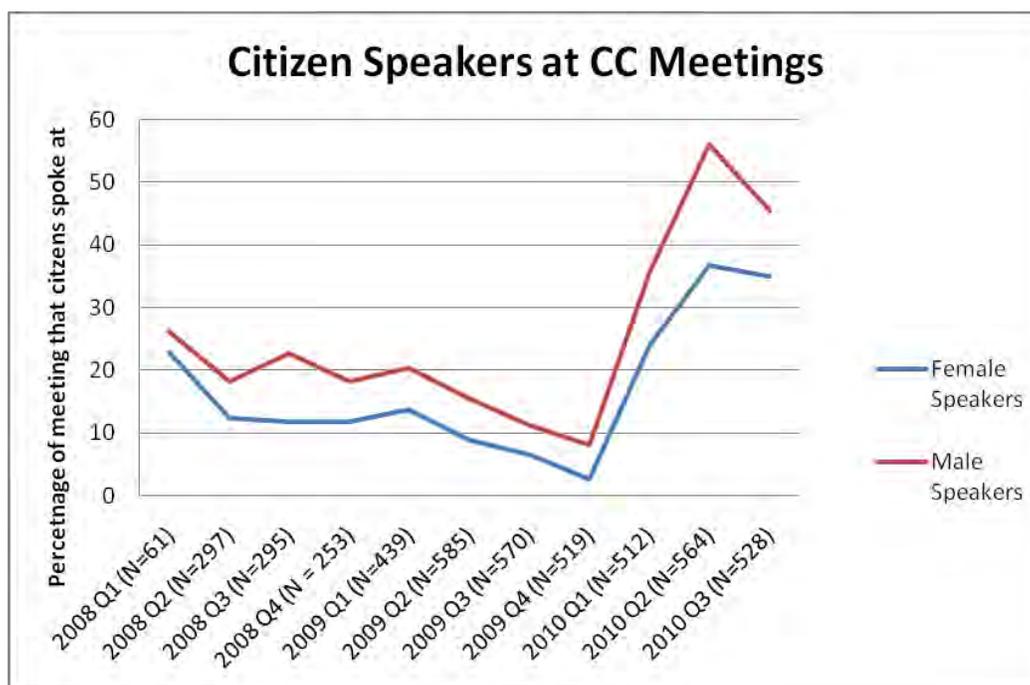
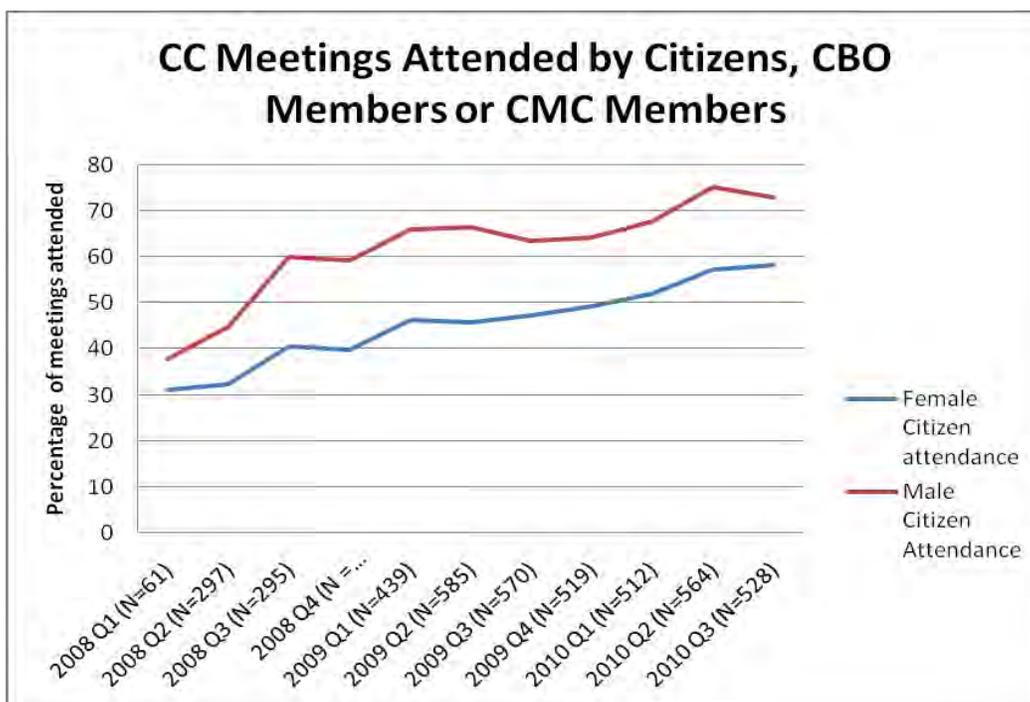
From the Citizen Satisfaction Survey it was found that:

- Citizens in LAAR communes were significantly more likely to use village-level notice boards;
- Councilors in LAAR communes were also more likely to perceive village-level notice boards as an effective means of disseminating information;
- Citizens in LAAR communes were *not* more likely to use commune-level notice boards (notice boards erected in front of the commune office) than non-LAAR communes; and,
- Councilors in LAAR communes were *not* more likely than non-LAAR commune councilors to believe that commune-level notice boards were effective to disseminate information.

However, these figures should be taken cautiously, as large numbers of citizens do not use notice boards and the number of notice boards at the village-level in non-LAAR communes is likely to be very low. That said, it is clear that and commune councilors greatly over-estimate the effectiveness of notice boards.

Monitoring commune council monthly meetings: The mechanics of local democracies in Cambodia are most clearly expressed through commune council meetings. Consequently, the monitoring of monthly commune council meetings was an important element of LAAR's work. Through commune council meetings LAAR could monitor, not only the frequency of meetings, but rates of participation, the depth of participation and the procedures put in place to ensure participation, accountability, transparency and partnership. At the end of the program LAAR conducted a detailed review of meeting observation data.

From the review of meeting observation form data, positive trends for LAAR's efforts of supporting and promoting a more active and engaged citizenry were found. What remains unclear and is difficult to gauge is if this increase in participation and active engagement in commune affairs is sustainable beyond the project.



The first three years of the LAAR project saw a predominant focus on the supply side of governance in project activities. This, for example, involved trainings with commune councilors about their roles and responsibilities and more general trainings on good governance amongst other things. Towards the end of 2009, activities started to focus more on fostering the demand side of governance. While activities had always been directed towards this end, LAAR took a step back from the training and focused more

on how to increase the demand side of governance. This seems to explain the sharp and significant increase in citizen's speaking at council meetings that can be noted in the above graph.

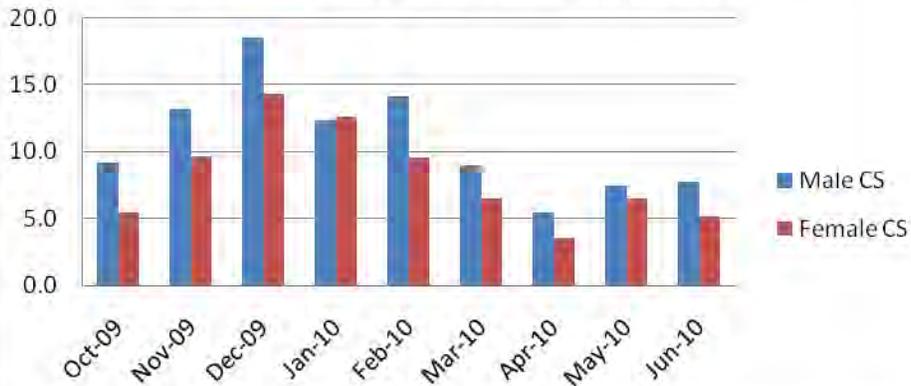
Specifically, one activity that was incorporated around late 2009 was coaching. This involved PNGO staff holding meetings with citizen's and CMCs immediately before commune council meetings to brainstorm, role play, and prepare statements and questions to be raised to councilors during the meeting. Such activities would have had positive effects on the confidence of citizens and CMCs to speak during meetings. The sharp increase in citizens speaking could easily be attributed to the coaching initiatives employed.

Other evaluation activities of LAAR (e.g. focus group discussions) have demonstrated that challenges to participation remain large and, in many cases, overpowering, and citizens continue to undervalue and under prioritize attending meetings and engaging in commune affairs, especially when activities are not seen to directly affect them. This, coupled with the findings reported here, is somewhat concerning.

When looking at the graph on speaking at meetings, we already see that despite such a notable and significant increase over the first two quarters of 2010, the surge in speaking at meetings started to wane in the third quarter. While this could merely be a leveling out, it does put to question the sustainability of the efforts made by LAAR. It is possible that field staff played too strong a role in getting citizens to meetings and encouraging them to speak and this could have resulted in the field staff's presence and push being the motivating factor, rather than establishing and engraining a personal motivation (through, for example, adequately increasing citizen's knowledge about the benefits of and reasons for participation), which could have been sustainable. The decline, seems to imply that the activities which led to the sharp increase in speaking were unsustainable given that the slight withdrawal or pull back from PNGOs that came in the final months of LAAR activities have already shown a decrease in what was a significant trend. Yet it also seems likely, that once citizens have spoken once they are more likely to speak again. Thus, further research would be required to understand and explain this trend.

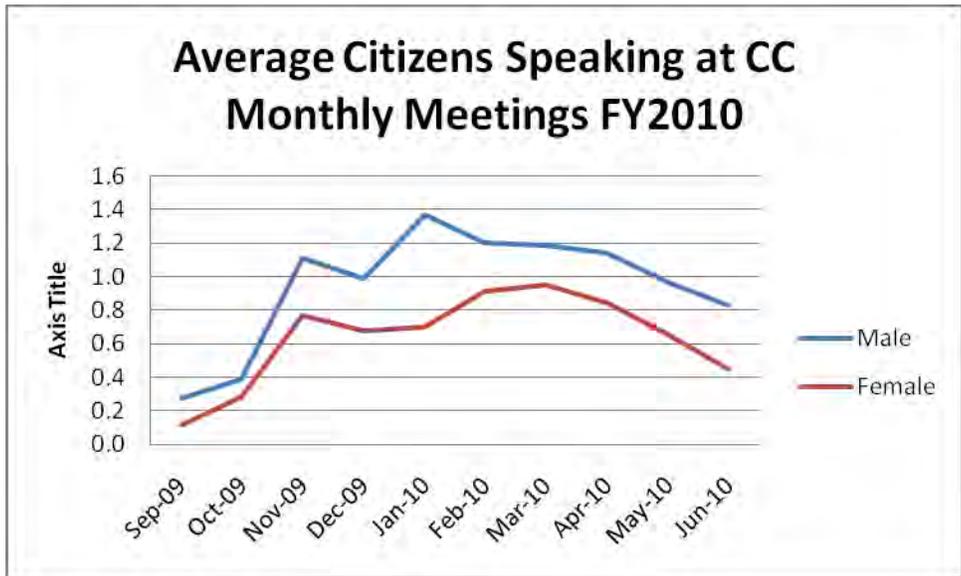
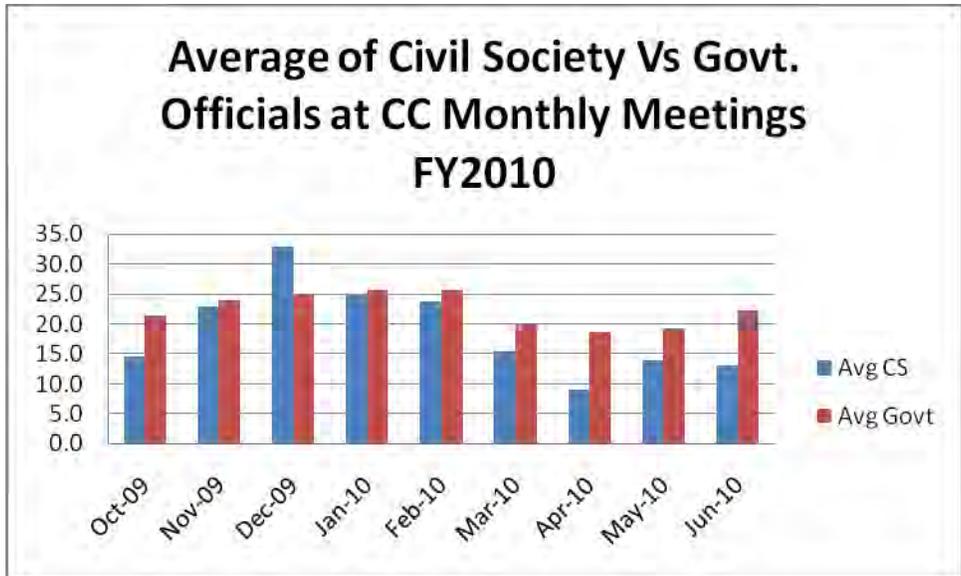
While LAAR may not have had sustained success in creating a culture whereby citizens were confident enough to speak, LAAR was definitely successful in actually getting citizens to attend meetings. Changing behavior patterns is difficult and this success in achieving a steady and consistent increase in attendance should not be overshadowed. The significant linear trend is important. In many ways it demonstrates an increased understanding by citizens of the benefits of participating in commune meetings and an increased commitment to ensuring democratic engagement, which, arguably, over time could organically lead to more active (i.e. speaking) in meetings once citizens have had the opportunity to build their confidence in their own time.

Average Civil Society Participation in CC Monthly Meetings FY2010



Average Govt. Participation at CC Monthly Meetings FY2010





Commune Action and Effectiveness Process: The Commune Action and Effectiveness Process (CAEP) was an innovation of LAAR designed to assist commune councils and citizens reflect on the commune council performance and plan for future local reforms. The CAEP is an annual participatory self-evaluation tool which can be used by councils to assist in the yearly planning cycle to improve governance practices. The CAEP aims to enable councilors and citizens to assess the commune council’s performance in a way that is meaningful, practical, timely and useful for the commune councils (while enhancing accountability). The CAEP was designed to align with the commune investment process (CIP), so that activities identified could have resources allocated to them.

Early in 2010, LAAR assisted 32 commune councils across eight provinces to undertake a CAEP assessment of their commune. By the end of the next quarter, 27 commune councils (or 84%) had budgeted for activities identified and prioritized during the CAEP in the commune investment plans. This indicates that the commune councils found the process useful and that the CAEP has great potential for

improving governance at the local level. Further, anecdotal evidence suggests that the majority of commune councils involved in the pilot will continue to make use of the tool and the findings.

In Phtas Kandal commune, Kampong Cham province, for example, the Commune Chief was particularly happy with CAEP noting that such a process would help develop ‘real’ democracy and facilitate productive discussions with citizens. A number of citizens also said that they had learned more about their rights and responsibilities as citizens during the process.

At the end of the program LAAR produced a CAEP handbook that was endorsed by MOI and the NLCS before being disseminated to commune councils and civil society groups across Cambodia.

CAEP Case Study: Kampong Chak commune, Svay Rieng

As a commune council member in Kampong Chak commune, Pen Saman had always assumed he was doing a good job helping to guide his community’s development. But he never knew for sure.

The commune council, as elected representatives of their communities, is tasked with making decisions and prioritizing development projects on behalf of the people. However, for years, commune councils like the one in Kampong Chak operated with no quality control and no system for checks and balances to test the council members’ effectiveness and pinpoint shortcomings.

–We just operated on our own and made our own decisions,” said Saman, first deputy to the commune council chief. –The commune council never considered the villagers thoughts or opinions.”

Recently, however, Saman and fellow councilors began to recognize the importance of community feedback and upholding the letter of the Law of Administrative Management of Commune/Sangkats, which mandates commune councils work to fulfill the needs of the people. Without that mirror, he said, they have no way of knowing if they are serving their community to the best of their ability.

A pilot program aimed at improving effective leadership of commune councils has completely changed the dynamics between villagers and their council representatives, inserting accountability and oversight into a system that lacked a method of measuring success. In 2009, Kampong Chak was selected as one of 32 communes in eight provinces and among 356 commune councils across Cambodia supported by Pact to strengthen democracy through testing and development of the Commune Action and Effectiveness Process, known as CAEP. CAEP is a participatory approach to self-assessment and self-evaluation of commune councils that empowers citizens to provide constructive feedback to their commune council to improve their duties and services with an eye toward improving the councilors’ responsiveness and accountability.

Before the CAEP, commune council members used an informal process to solicit feedback from the community. During village meetings and public forums, they would ask, simply: –Are we doing a good job?” But the question inevitably resulted in blank stares.

–We would ask that question, but maybe the villagers didn’t fully understand what we do,” Saman said. –With the CAEP, we put our roles and responsibilities on a board so everyone is clear what we do, then they give us scores on how we are doing our job.”

Kampong Chak council members described the CAEP like a school report card where grades indicate a student’s efforts and achievements, as well as shortfalls and what areas need improvement. Because the Kampong Chak commune council sees the benefit of these self-assessments, the council conducted them twice in 2010—while most other communes as part of the pilot program conducted them only once—with follow-up community meetings every quarter between assessments to ensure the council has remained on track toward improvement.

Although funding support from Pact has ended, Kampong Chak Commune Chief Som Sarah has already allocated money in his 2011 budget to continue at the CAEP at the same level and frequency. That’s because he has seen how useful the tool is to both the council and the community.

The commune’s first CAEP process in February 2010 brought together commune council leaders and community groups in separate workshops but with the same goal: to rank the commune’s top social issues and score the council based on council members’ performance in addressing the issues. Citizens and their council members then came together in a joint workshop to compare notes.

From these evaluations, the council prepared a Community Action Plan that prioritized next steps to guide the council where next to focus its time and resources.

–We use this as a lesson for ourselves,” Saman said. –This is like a ruler to measure our growth. Sometimes we grow, but sometimes we shrink.

When we shrink, we have to know the causes and address them.”

Commune council leaders in Kampong Chak admitted they were initially resistant to the idea of the CAEP and intentionally making themselves vulnerable to constructive criticism—a resistance borne out of Cambodia’s cultural code where hierarchy keeps power at the top and challenging authority is considered an affront.

–We were worried the people would be unhappy with us,” Saman said. –But we also knew we needed to understand what was missing. We know we are not perfect. We dared to look at ourselves to see our gaps.”

Council members now agree this type of self-reflection and formal process for citizen feedback is critical to helping guide the commune council do their jobs better, and as a result, improve the commune’s present situation and steer the community toward a better future.

–If we get upset with their criticism, we can never improve our work,” said Neang Sarun, 46, a commune councilor who focuses on women’s and children’s issues. –The CAEP process makes things clear for everyone. When we have this process, we have guidelines to follow.”

For Kampong Chak citizens, the CAEP has validated their votes and deepened their faith in their commune council.

–If the council does not perform well, the consequences will be in another five years when another election comes,” said Touch Sina, 31, a member of the Commune Mobilizing Committee, a group of volunteer citizens tasked with overseeing the work of the commune council and being a conduit for information between the council and the community.

More than a necessary tool to measure commune council members’ effectiveness, Councilor Sarun said the process also demonstrates her council’s achievements.

–This is for the villagers to know they voted for the right people, but it’s also for us to have evidence to prove we are doing good for the people,” Sarun said.

Activity Area 6: Promoting good governance values of participation, accountability, transparency, partnership and equity, and the responsible stewardship of natural resources

Cross-cutting issues: The promotion of good governance, the engagement of under-represented groups and the responsible stewardship of natural resources were ‘mainstreamed’ throughout the project; in training manuals and in technical support.

While ‘good governance’ was a constant theme throughout the program, at times the other cross cutting issues of ‘equity’, meaning the inclusion of under-represented groups (women, youth, ethnic minorities, etc), and ‘natural resource management’ do not appear to have been well articulated or implemented; except for where there were concerted efforts, such as with women’s empowerment groups, youth initiatives and natural resource management based SDPs. In many ways this was largely due to the limited resources of the project and the many assumptions that were made during the design of the program, which meant that these elements were the last to receive attention. Further by defining these issues as ‘cross-cutting’, rather than promoting them as issues in their own right with specific activities, seems to have meant that participants in the program did not give these issues their full attention.

An example of how LAAR promoted Gender equity can be seen in the excerpt below from the LAAR training manuals.

LAAR worked to assist commune councils to ensure that they are benefiting both men and women. Gender refers to socially and culturally accepted ideas about what it means to be a woman and what it means to be a man. The concept of gender includes what are considered appropriate roles, responsibilities and behavior for women/girls, and for men/boys. Ideas about gender are different in each society. Ideas about

gender change over time.

Gender equality

Gender equality means that women and men have equal enjoyment of rights and opportunities and equal benefits from services and resources. Equity of women and men is desirable as it is fundamental human right recognized in the Cambodian Constitution and international human rights instruments. Equality of men and women is recognized as key to poverty reduction and sustainable development. Evidence shows that when women and men are relatively equal, economies tend to grow faster, the poor move more quickly out of poverty, and the well-being of men, women and children is enhanced.

Gender equality in local governance

Local democratic governance brings government closer to its citizens. Bringing government closer to the people is meant to increase the ability of government to hear and listen to the needs and interests of all its citizens and therefore increase the ability of government to respond to the real needs and interests of its citizens. Gender equality in local governance is NOT automatic: ideas about gender roles for women and men create **barriers**; ideas about gender tend to limit women's involvement in local governance; limited involvement means less influence in decisions that affect quality of life; and less influence means less benefit from decisions.

Actions to be taken by the commune councils

Commune councils must take **active steps** to ensure that both women and men – have opportunities to voice their needs, interests and priorities; have opportunities to influence CC decision making and priority setting; have opportunities to contribute ideas about how to meet their needs and interests; receive information about CC affairs; and receive real benefit from CC activities. Ensuring gender equality in local governance is not about favoring women over men, or about favoring men over women. Ensuring gender equality in local governance means benefiting **BOTH** men and women, boys and girls.

The challenge is to translate these concepts into practice



Commune councils must make a commitment to take gender into account in all that they do

4.7 Project Outcomes and Impact

As stated in the 'Monitoring and Evaluation' section of this report, LAAR undertook a number of activities to assess the programs outcomes and impact that were brought together in a Summative Evaluation Report. Given the large size and complexity of the LAAR program, it was necessary to draw upon several evaluation methodologies to understand the outcomes and impact of the program, some of which have been detailed in the 'Program Activities and Outputs' section above. The methodologies employed during the summative evaluation of the LAAR program included:

- **A Document Review:** A document review of the six DAT reports, the independent USAID mid-term evaluation, and the program's annual reports (which included data on program indicators and outputs) was conducted by Pact staff to examine changes in the program over time, and the management decisions taken that affected the outcomes of the program.
- **A Meeting Observation Form data review:** Throughout the project LAAR staff observed 4,958 commune council meetings. During the meetings PNGO staff completed a meeting observation form designed by LAAR management. These forms captured information on participation rates, meeting decisions and meeting processes. The data collected using these forms were compiled

and analyzed using statistical methodologies. The results of which were compiled into reports by Pact staff.

- **Two Citizen Satisfaction Surveys:** Over the course of the project LAAR undertook two Citizen Satisfaction Surveys. The First Citizen Satisfaction Survey completed by the Centre for Advanced Studies in 2008 established a baseline for the LAAR program which would form the basis of an impact evaluation using pseudo-scientific methods. The Second Citizen Satisfaction Survey completed by the Economic Institute of Cambodia (EIC) in 2010 allowed LAAR to compare changes over time in the perceptions of commune councilors and citizens in areas related to local governance. Additionally the surveys allowed for comparisons between target and non-target groups, men and women, poorer and richer people, and, young people and older people. Both surveys sampled over 2,000 citizens and 200 councilors. From the survey data in 2010 two reports were produced; one by EIC exploring the findings in general and one by Pact staff exploring the impact of specific LAAR activities.
- **Focus Group Studies:** In the second half of the LAAR program, LAAR made a concerted effort to learn more about how its activities were affecting change. As a part of this effort LAAR undertook two series of focus group studies. The first study explored the factors that encourage and discourage citizen participation in commune council affairs. This study consisted of six focus groups conducted with councilors, community mobilizing committee members and citizens disaggregated by gender in Kampong Thom province. The second study was a qualitative assessment of the differences between LAAR and non-LAAR communes, and councilors and citizens in their perceptions of three of LAAR's four good governance principles. This study consisted of 12 focus groups across three provinces, and was designed to complement the Citizen Satisfaction Survey.
- **Most Significant Change stories:** The most significant change technique is a relatively new and participatory monitoring and evaluation technique used in a number of developing countries throughout the world. LAAR adopted this technique as a part of the summative evaluation, as it enabled beneficiaries to tell their story in a way that would give LAAR an insight into what they thought the most important changes were that occurred in their commune as a result of the program. The technique also allowed for LAAR to capture change that was not anticipated by monitoring efforts and surveys. Additionally the technique promotes the ideas of transparency, accountability and participation in an evaluation, which is in fitting with LAARs model of governance and democratic philosophy. The stories selected during this process were compiled into report along with the methodology and justifications for story selection by program participants.
- **A Stakeholder Evaluation Workshop:** A stakeholder evaluation workshop was convened by LAAR in the final months of the program; shortly after field based activities had been completed. This workshop was designed to ensure that a wide range of stakeholders were able to review program data and draw conclusions about the program, based on the data presented and their own experiences. By convening a stakeholder evaluation workshop, LAAR aimed to uphold the

democratic values that underpinned the program, and thus lead by example while promoting the local ownership of lessons learned. Additionally, LAAR hoped to get an insight into what were the most important outcomes for program stakeholders and to triangulate its own findings where possible.

- **A Women's Empowerment Group Survey and focus group study:** A part of the Worth for Civic Engagement pilot project, LAAR conducted a survey with 40 randomly selected pilot project participants, assessing their savings habits and literacy skills. LAAR also conducted a series of six pre and post program focus groups discussions with commune councilors and women's group participants to elicit a deeper understanding of the pilot programs outcomes.

Taken together these different methods can be used to present a holistic picture of the affects of the LAAR program and allowed for different voices to be heard in the evaluation process. As each of these individual activities generated considerable data and resulted in the production of at least one report that can be read separately, the findings from these activities will only be summarized in this report.

From the evaluation activities there is clear evidence which demonstrates that the LAAR program has performed well in achieving its stated goals and objectives. Key findings from the evaluation activities note that:

- The CMC model (concentrated educational training and technical support) is an effective way of promoting greater citizen involvement in commune activities and, thus promoting participation, accountability and transparency at a local level;
- Commune councils are capable of managing grants with the appropriate technical assistance;
- Commune councils are capable of developing responsive social development projects that address important local issues, and with the right technical assistance they can be quite effective at addressing these issues, especially where there are gaps in service delivery, such in the areas of domestic violence, youth issues, and land conflict;
- Commune councils and CMCs benefit from networking with other commune councils and CMCs, and from working together;
- The combination of training and technical assistance was effective in developing the capacity of commune councilors and CMC members;
- Face to face meetings, such as community forums and community outreach are the most effective way in increasing transparency at the commune level and in promoting more engaged citizens;
- Notice boards can help improve transparency, but are limited in their effectiveness;
- Working with the Government and other key stakeholders at the national level has ensured that the programs outcomes will be more sustainable;

- The CAEP is an effective participatory process to initiate community dialogue and correct governance issues in a commune;
- It was important to invest in both the supply-side (CCs) and demand-side (citizens) of local democracies to improve good governance at the local level. The program would not have been as successful had it just focused on one side;
- The LAAR program was largely culturally, politically and historically appropriate and relevant;
- The LAAR program model and good governance model was appropriate to achieve the program outcomes; and,
- LAAR performed well in enhancing civic engagement between citizens and their local commune council representatives, which has resulted in more responsive local development.

From these findings, it is clear that the LAAR program was successful in meeting its objectives and goals, and that the LAAR model and activities could be replicated in other communes.

4.8 Project Sustainability

There are indications that a number of LAAR inspired activities will continue without the support of the LAAR program. However, the sustainability of these activities will largely rely on local commitment, government policy and ongoing support from technical experts. Further, while activities may be sustainable, it is questionable if they will be enough to ensure sustainability of local democracy, good governance and civic engagement on the whole, especially considering the current national political climate where criticism is often viewed as dissent and is punished through the judiciary.

This aside, LAAR has made tremendous gains in developing the capacity of local NGOs, CMCs and commune councils which provides a foundation and set of good practice to build on and continue in the future. Further, as the program entered its final stages, LAAR produced a number of handbooks and manuals, developed based on LAAR's experience which will have a legacy over the medium-term. These publications have included the Community Outreach Handbook, the Public Forum Handbook, the CAEP Guidebook and the SDP technical packages; all of which were endorsed by the government and circulated to commune councils and NGOs across the country.

Lastly, given the influence that LAAR has had with MOI and the NCDD, it is likely that much of the contemporary policies and guidelines being drafted by these agencies will be greatly influenced by the LAAR programs experiences and key messages, ensuring the sustainability of these messages in the long-term.

4.9 Lessons Learned

There are many lessons that can be learned from the LAAR program:

- It is important to invest resources in both the supply-side (councilor) and demand-side (citizens) of local democracies to improve good governance at the local level.

- It is important to take time and develop foundational skills for a project like LAAR. Working to improve commune councilor ability to understand the grant management process and working with PNGO staff to develop their understanding of good governance and democracy were important pre-conditions which aided the success of the program.
- It is more effective to work with the existing, if somewhat inactive, civil society and community based organizations at the commune and village level to promote active civic participation.
- Concentrated educational training and technical support is an effective way of promoting greater citizen involvement in commune activities and, thus promoting participation, accountability and transparency at a local level.
- Concentrated efforts are required to engage under-represented groups more effectively in commune activities, especially youth, women and the disabled. It is not enough to simply mainstream these issues in a program.
- There is room for improvements in the delivery of technical sector-specific services to commune councils. To align technical support on specific issues would greatly enhance the effectiveness of commune councils while also responding to pressing local issues.
- Commune councilors could build stronger partnerships with the private sector and other commune councils in addition to line departments and civil society groups to tackle community issues more effectively, especially on issues that cross commune borders (such as environmental issues) or are common to many communes (such as land disputes).
- While infrastructure remains important, there is room for councilors to undertake socially focused projects especially where there are gaps in service delivery, such as in the areas of domestic violence and land conflict which are important issues for local people.
- SDPs are an effective mechanism for countering pressing local issues and enhancing local governance, however provincial and district level support for commune councils implementing SDPs is required.
- Notice boards have limited success in improving transparency. Village level notice boards are more effective than commune level notice boards.
- Commune councils can be more effective if they engage in community outreach and public forums, but they need to make efforts to involve citizens at the village level and ensure meetings are held at times convenient for citizens.
- The Most Significant Change technique to document change from the program beneficiary's point-of-view is suitable as an evaluation tool in the Cambodian context. Local story tellers have been able to convey meaningful stories, in their own words, which are easily understood by their peers and outsiders. The story tellers and the story selection panel members demonstrate clear ownership of their stories and have been proud to tell their stories. This approach should

be developed and built upon in the future development programs in Cambodia. It is important for programs to go beyond the standard indicators and experiment with techniques like this.

- The LAAR hosted Stakeholder Evaluation Workshop designed to enable program stakeholders to critically reflect on the program achievements, strengths and weaknesses was an effective and beneficial process. The workshop successfully resulted in lively, articulate and engaged debate between participants. LAAR received positive feedback about the workshop and was able to use the feedback from the workshop to gather a greater insight into the programs outcomes, from the point-of-view of program stakeholders.
- PMPs are not an effective way of measuring change in programs aiming to result in broad social change. Bigger picture methodologies are more useful and accurate.
- The CAEP is an effective tool in helping promote behavior change by both commune councilors and citizens, and is helping communities to establish constructive dialogues that lead to change. The CAEP could easily be expanded to other provinces and communes.
- There is a strong political will in the Ministry of Interior to pursue democratic and good governance reform at the commune level.
- LAAR's approach to closely involve the governance officials in documenting experiences and best practices during the last quarter of the program proven effective, as the process was not only promoted the government ownership of the materials but also giving opportunity to the junior officials to extend their knowledge and experiences.

4.10 Recommendations

Despite the good work of LAAR, the government, and other organizations supporting decentralization local government in Cambodia still has a long way to go before it is institutionalized and before democratic and good governance practices take hold across the country.

It is at the local level, where people have the opportunity to engage with officials, to debate issues and make change, that real democracy is formed and practiced. It is important to invest in both civil society to ensure that people understand their rights and are capable of pursuing change, and to invest in local government so that they are capable of responding to people's needs and facilitating local development in a fair and transparent manner. Without such an investment, democracy will remain simply a façade and poor people will be repressed by political and economic factors.

Given the success of the LAAR program, it is important for stakeholders in the decentralization and deconcentration process – development partners, the Government, NGOs, CBOs and commune councils - to take the lessons learned from the LAAR program (outlined above) and to build on them in order to pursue a true democracy that will raised standards of living and access to appropriate service across the country.

5. Component 2: MAE

5.1 Background to MAE

The Cambodian people have been dealing with corruption since colonial times. Corruption in Cambodia today remains endemic and pervasive, so much so, that many believe that it is a cultural fact. Its impact is felt throughout all sectors of society, from poor families in rural provinces, to large businesses operating throughout the country. Cambodia has been characterized as a country in which a high degree of state capture and high levels of collusion between the state and private sectors have distorted the most basic legal and regulatory framework, thereby exasperating corruption.

Since 2005, there has been a growing recognition of the major obstacle that corruption poses to development in Cambodia. The Royal Government of Cambodia's (RGC) decision to place corruption at the center of its Rectangular Strategy in July 2004 represented an important initial step establishing the fight against corruption as a critical part of the country's agenda. In 2005, Cambodia was ranked for the first time ever on Transparency International's (TI) Corruption Perception Index as 130th out of 158 countries, and was rated 3rd out of 68 for the frequency of paying bribes to civil servants. World Bank President Wolfensohn, in a February visit to Cambodia that year, identified corruption as the primary obstacle to development in the country. A study conducted by the Economic Institute of Cambodia (EIC) in March of 2006, found that 80% of the county's business leaders considered corruption to be the primary hurdle to economic growth in the country; and a longitudinal study conducted from 1998 to 2005 by the Center for Social Development (CSD) documented an empirical decrease in the public's acceptance of corrupt acts by government officials indicating a positive change in the public's attitude toward corruption. When, in 2006, Cambodia slipped on TI's Corruption Perception Index from 130 to 151, many conjectured that the change was due not to an increase in corruption so much as an increased willingness within Cambodian society to acknowledge and discuss the problem openly.

With momentum on the issue building, the RGC made a commitment in early 2006 to the Consultative Group (CG)—a regular meeting of key multilateral and bilateral donors with the RGC—to pass its first anti-corruption law (ACL) meeting international standards by June of that year¹². Subsequently, the Prime Minister declared a “war against corruption” in Cambodia, and donors continued to highlight the issue as one of the primary challenges facing the Government. However, as of February 2007, the country still lacks the promised ACL and abuse of public office remains prevalent at all levels of Cambodian society.

It was in this context that the MAE program was conceived as a follow on to an earlier anti-corruption program being implemented by Pact called the Anti-Corruption Coordinated Action Program (ACCAP), which ran from early 2005 to the end of January 2007 with support of the Danish International Development Agency (DANIDA). The ACCAP program was the first anti-corruption specific program implemented in Cambodia and sought to redress corruption by engaging with the Royal Government of

¹² This was the second time the RGC made a commitment to the Consultative Group – the first being in 2004.

Cambodia, the international donor community and Cambodian civil society. To engage with the RGC, ACCAP worked collaboratively within the Ministry of National Assembly Senate Relations and Inspections (MoNSARI) to develop a draft Anti-Corruption Law in compliance with applicable international standards and best practices. Additionally, ACCAP developed education and informational materials targeted at civil servants intended to help drive demand for stronger anti-corruption reforms, and provided an introduction to the concepts behind freedom of information legislation. To engage donors, ACCAP supported the creation of an informal anti-corruption donor working group, pushing for increased coherency and coordination in the messages and activities of donors with respect to the anti-corruption legislation.

Finally, to engage civil society, ACCAP worked to create an environment in which the use of public resources by officials could be publicly discussed, and in which fraud and corruption in all forms would not be tolerated. This was undertaken by working directly with and through Cambodian partners to raise awareness of the consequences of corruption at all levels of public life in Cambodia. Beyond raising awareness and creating demand for reform, however, the program aimed to equip civil society organizations and community based organizations with the critical tools and skills they would need to combat public corruption. These capacity building steps, coupled with the Program's awareness raising and educational activities sought to create the seeds of an active civil society that was both fully cognizant of the corrosive effects of corruption, and fully capable of monitoring and combating its pervasiveness.

While ACCAP met with great success on a number of these fronts, progress was frustratingly slow in several other critical areas, illuminating perhaps the most important lesson of the Anti-Corruption Coordination Action Program: that despite strong rhetoric within the Royal Government of Cambodia vis-à-vis its commitment to meaningful anti-corruption reform, the political will behind such reform is simply not present. In December of 2004, at a meeting of the donor-government Consultative Group, the Royal Government of Cambodia committed itself to passing a meaningful anti-corruption law prior to the end of 2005. Yet despite the best efforts of the ACCAP, its partners, and its allies in the donor community, there still was no draft of the law as of March 2007.

Even though ACCAP had been successful in exposing to the public the chasm between the Government's rhetoric and action, by the end of the program there was still much work to be done to generate greater political will and to support the nascent civil society movement. It was largely in response to these issues that the MAE program was designed and implemented.

To implement the MAE program, Pact proposed a modification to its Local Administration and Reform (LAAR) Program Cooperative Agreement to include a four-year initiative to extend and deepen the results achieved by ACCAP over the previous two years. By incorporating the program within the existing Cooperative Agreement, Pact sought to support the USAID Strategic Objective 'Improved Political and Economic Governance' and 'Program Component 1: Promote and Support Anti-Corruption Reforms' while creating opportunities for links with 'Program Component 4: Support Democratic Local Governance and Decentralization'. Pact adopted the intermediate results articulated in USAID Cambodia's 2005-2010 Strategy as the framework for MAE.

To achieve these intermediate results, MAE would take a flexible and innovative approach to engage with key actors and seek to mainstream anti-corruption efforts with the Government, civil society, journalists and businesses. Thus the MAE program worked at multiple levels to curb corruption in Cambodia by improving knowledge and awareness of corruption issues, developing skills and resources to counter corruption, effecting behavioral change, and increasing demand for changes in the legal framework of Cambodia that support transparency, accountability and anti-corruption practices.

The name 'Mainstreaming Anti-corruption for Equity' was chosen because it could be reduced to the catchy and memorable acronym 'MAE' in Khmer, which means 'mother'. It was believed that using the word 'mother' for an anti-corruption program in the context of Cambodia would be beneficial for the program, as it has positive cultural, social and nationalist connotations. When linked with LAAR, which means 'good' in Khmer, it further heightened the applicability of the program title.

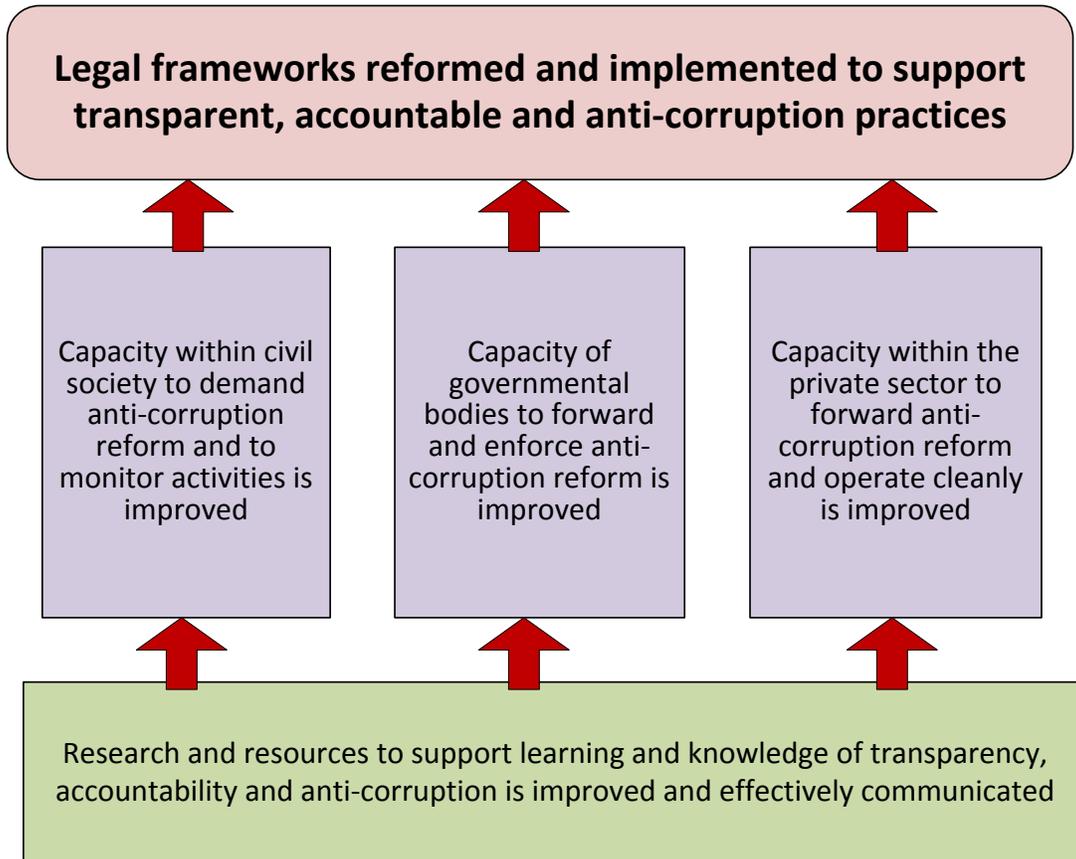
5.2 Project Model

In order to be flexible, and therefore effective, the MAE program undertook a strategic and opportunistic approach to program implementation so that it could adapt to the changes in political climate and capitalize on opportunities as they arose. In the initial stages of the program efforts were largely focused on creating pressure on the government to adopt anti-corruption reform, by assisting journalists to report better on corruption stories and assisting civil society groups to lobby the government and raise awareness of the negative effects of corruption. However, as time passed and adoption of the Anti-Corruption Law stalled, it became clear that MAE needed to expand its efforts, and thus MAE sought to engage the private sector in the fight against corruption. It also became clear that better research and resources were required to maintain the momentum of the movement. Finally, with the adoption of the Anti-Corruption Law (ACL), MAE shifted its strategy again to work directly with the newly established Anti-Corruption Unit (ACU), assisting the Unit to develop their capacity to firstly understand corruption, then implement the ACL and enforce its provisions. Consequently, the program model changed numerous times throughout the project, under different leaders and in response to the contemporary situation.

This flexible approach was criticized by the Anti-Corruption Advisory Team (ACAT), who undertook two evaluations of the MAE program in its early stages. The ACAT team felt that such an approach meant that the goals and activities of the program were not well aligned and understood, and that this threatened to undermine the achievements of the program. While this criticism is valid and holds some truth, there were some core themes that resonated throughout the program that enabled the team to maintain focus on the end goal of ensuring the adoption of an anti-corruption law. So while the program model changed and at times the activities diverge a little, this did not mean that the ultimate goal and focus was lost.

Throughout the program the program logic was: to create resources and research that supported learning and knowledge about corruption, which could be used by civil society (including journalists), the Government, donors and the private sector to develop their capacity to understand, lobby for, monitor, implement and enforce legal reform that could counter corruption. Through the Government, civil society and private sectors MAE aimed to ensure that a legal framework was put in place to support

transparent, accountable and anti-corruption practices. In this way MAE sought to create foster a political will amongst different actors to pursue reforms. This concept is visually represented below:



5.3 Project Roll Out

As mentioned, the MAE program was initially designed as a follow on to the ACCAP program, which was implemented from December 2004 until March 2007. Consequently, the MAE program was designed to continue some existing ACCAP activities (the Clean Hand Campaign) and develop some new activities. In its early stages, the MAE program sought to focus on:

- Expanding civil society efforts to bring the private sector, including extractive industries, into the anti-corruption debate;
- Strengthening the capacity of journalists to focus on anti-corruption stories;
- Helping the Royal Government of Cambodia to develop a Freedom of Information policy paper, as a forerunner to an anti-corruption law;
- Launching a strategic advisory body called a 'think tank' to advise the program on strategies and activities;
- Integrating with the LAAR program to cover anti-corruption issues at the commune level; and,

- Generally facilitating the mainstreaming of anti-corruption practices across all USAID programs.

At the core of these activities were two objectives: to raise public awareness of corruption and its impact on society, and to build demand (and political will) for public sector reform to counter corruption.

By the end of financial year 2008 MAE, in response to pressure from USAID, had scaled back activities aimed at raising public awareness of corruption issues to focus on strengthening demand for reform. As a result MAE focused on two general activities:

- The Million Signature campaign, which mobilized average Cambodians in a mass effort to put pressure on the Government to adopt reform, timed to end shortly before the 2008 national elections; and,
- The wide dissemination of the Clean Hand brand and associated anti-corruption messages, which became ubiquitous and widely known throughout Cambodia.

MAE also focused on several more targeted activities which included:

- The development of a private sector partnership, called the Clean Business Initiative, aimed at drawing the private sector into anti-corruption efforts;
- The development of a CSO coalition, called 'Cambodian for Resource and Revenue Transparency' designed to monitor the extractive industries and lobby for reform;
- The development of a Freedom of Information Working Group, an FOI policy paper and efforts to reinforce journalistic coverage of corruption; and,
- The development of a civil society coalition which could continue to lobby the government and undertake anti-corruption initiatives beyond the life of the program.

Also during the early stages of the project, MAE contracted a team of evaluators called the Anti-Corruption Advisory Team (ACAT) to undertake two external reviews of the program, which assisted MAE to adjust its strategies.

Many of these activities were continued throughout the program, but receiving varying levels of attention and support, according to the political climate and the opportunities presented and internal staff changes.

5.4 Project Management

The high turnover of senior staff throughout the program severely undermined the achievements of the program. In the four years of project implementation MAE program staff worked under three 'permanent' Chiefs of Program (COPs), three transitional Chiefs of Program, three Country Representatives, and two National Directors. This resulted in a highly unstable environment which saw the program move in different direction each time a new COP came on board and undermined staff energy and momentum each time a COP departed. In comparison to the LAAR program, which

maintained fairly stable management throughout the projects five years, the affects of these changes on staff and program direction were clear, tangible and profound. This also had an affected on MAE's relationships with partners, including the Government and civil society partners, as each COP had to build trust and develop working relationships, an integral factor in the Cambodian working culture. Additionally, the amount of time required by each COP to be recruited, arrive in Cambodia, adapt to the program, the context, strategize and reorganize the staff also meant that the program lost a lot of valuable time which could have been better spent working with partners to achieve program objectives.

Despite these changes, most of the local staff remained committed to the fight against corruption and stayed with the program until its conclusion, thus bringing some consistency to the program that enabled MAE to make some headway in achieving its goal. MAE staff were largely organized functionally around the objective and corresponding activities they were responsible for overseeing. Throughout the program, a separate grant management unit oversaw the provision of grants, thus eliminating any conflicts of interests and providing an example for others to follow.

5.5 Project Monitoring and Evaluation

As per USAID requirements, MAE produced a Performance Management Plan (PMP) to monitor the program on key outputs. Initially, it was felt that the PMP, along with the regular Anti-Corruption Advisory Team (ACAT) assessments and regular monitoring, would be sufficient for the monitoring and evaluation requirements of the program. However, as the program progressed it became apparent that the complexities of the program were not being captured by this approach. This led the ACAT team to suggest the establishment of a dedicated Monitoring and Evaluation Unit. In response Pact Management established a Monitoring, Evaluation, Reporting and Learning (MERL) Unit and recruited a MERL Coordinator recruited to lead monitoring and evaluation efforts in July 2008.

The MERL unit assisted the program to more clearly articulate the program logic and tailor the monitoring of the program to changes. However, the unit was also affected by the changes in management, and was forced to adjust with the new direction articulated by the COP. Despite this the MERL unit was able to capture consistent data throughout the program, although given the nature of PMPs it is difficult to draw any meaningful conclusions from this data. Further, as a consequence of the changes in management, objectives, strategies, but mostly because the program was designed as a nationwide single issue advocacy program with no control or comparison groups, it was difficult to undertake any evaluative activities that could be said to establish program impact in the form of a 'counterfactual'. Despite this, MAE did undertake a Corruption Household Survey at the end of the program, using an innovative 2005 CSD study as the baseline, to measure changes in corruption at the household level in Cambodia since the program began, and thus gauge the effects of the program.

Additionally, MAE closely monitored developments in the public discourse through media monitoring, although these efforts were not consistent in their approach.

5.6 Project Activities and Outputs

Activity Area 1: Working with civil society to demand anti-corruption reform and monitor the Government

This section of the report details activities undertaken with civil society groups throughout the implementation of the MAE program. Several of the activities overlap, but have been broken out into singular activities to provide as much information as possible on each specific activity.

The Coalition of CSOs against Corruption and the Coalition for Integrity and Social Accountability: The Coalition of CSOs against Corruption (CoCSOAC), which later renamed itself the Coalition of Integrity and Social Accountability (CISA) when it localized and became independent from MAE, was a coalition of 32 NGOs brought together by MAE to tackle corruption in Cambodia. Through CoCSOAC MAE aimed to develop a strong coalition of CSOs that could engage with the government to demand anti-corruption reform, thus putting pressure on the government to pass an anti-corruption law, to monitor anti-corruption efforts and to implement their own programs that generate awareness of corruption issues and tackled corruption issues effectively.

Throughout the program MAE worked with the members of CoCSOAC to implement the Saat Saam (Clean Hand) Campaign which included the collection of one million Cambodian people's signatures petitioning the Government for anti-corruption reform; the development of an NGO position paper; the development and distribute Information, Education and Communication (IEC) material; the hosting of anti-corruption day events; the development of an online anti-corruption information source; the development and delivery of anti-corruption training; the hosting of anti-corruption forums and round tables; a clean hand concert; a radio talk-show; and, the publication of the Corruption Monitor monthly bulletin. Towards the end of the program MAE also assisted CoCSOAC to formalize into an independent coalition with a view to ensuring the sustainability of the Coalition.

The Clean Hand Brand: The Saat Saam (Clean Hand) brand has been a centre piece of the Clean Hand Campaign, and has played a critical role in opening up public dialogue on what is often a difficult subject to discuss. The brand was a white hand on a blue background, with the words Saat Saam printed in white underneath usually accompanied by a simple anti-corruption message above (see picture). The symbol was designed to generate interest and prompt discussion while delivering a simple anti-corruption message. The symbol was used widely on anti-corruption IEC materials including t-shirts, hats, posters, stickers and a pocket guide.



Although developed initially by the ACCAP program, MAE built on the brand to further its message. A survey on the impact of the Clean Hands campaign conducted by IndoChina Research indicated that 75 percent of respondents were aware of the Saat Saam brand and its anti-corruption meaning, making it

one of the most recognized brands in Cambodia. This is an impressive achievement. At the end of the project MAE handed over the Saat Saam logo to CISA, so that can continue to use it in their anti-corruption work.

The Million Signature Campaign: The Million Signature Campaign which took place from December 2007 through April 2008, and was implemented by MAE in partnership with the CoCSOAC members. The aim of the Million Signature Campaign was to place anti-corruption reforms on the agenda, as a key political platform, in the 2008 national election. During the campaign over 1,100,000 Cambodians signed or thumb printed a petition in favor of anti-corruption law that meets international standards. This was and remains one of the most successful and ambitious education and advocacy campaigns in the country.

The Million Signature Campaign petition was presented to the Government in Phnom Penh on May 16, 2008, prior to the 2008 national government election, and succeeded in making anti-corruption reform key political platforms for the 2008 election, with all political parties agreeing to pass the Anti-Corruption Law within one year of taking office. Following the Million Signature Campaign, Prime Minister Hun Sen and other RGC spokespeople made public statements indicating that indeed the ACL is a high priority for passage in the new National Assembly session. Although the ruling party did not pass the ACL until 2010, this was still within the mandate of that election, and thus it is hard to ignore the role of the Million Signature Campaign in influencing this outcome. The Million Signature Campaign, covered 19 provinces, and included public forums, village meetings, face to face discussions, and radio talk shows focusing on the costs of corruption and the need for an anti-corruption law.

NGO Position Paper: In May 2008 MAE assisted CoCSOAC with the development of a NGO position paper highlighting the slow passage of anti-corruption law through parliament and civil societies desire to see that any anti-corruption law adopted met international standards. The letter, which was submitted by to the Prime Minister, did not receive a response, but the process was a learning experience for the CoCSOAC members.

IEC Materials Distribution: In early 2008 MAE, LAAR and CoCSOAC worked together to produced 500 cadastral and 10,000 civil-registration-fees posters. These were placed in all the villages covered by LAAR as well as in other places managed by former-ACCAP partners and were designed to advertise the formal fees for public services, so that villagers would know if they were being charged appropriately for government services. Additionally, MAE distributed hundred thousand of handbooks, comic books, leaflets, posters, t-shirts, caps, balloons, official fee pocket guide, and more than a hundred of Clean Hand billboards with clean hand and anti-corruption messages. These were designed to deliver a simple and memorable message to Cambodians about corruption, with a view to encouraging them to remain vigilant and fight corruption.

Anti-Corruption Day (December 9): On International Anti-Corruption Day - December 9 - MAE provided assistance to CoCSOAC members and local NGOs to conduct 'Anti-Corruption Day' events across country in order to highlight the problem of corruption and bring people together to discuss and learn about corruption.

On December 9, in 2008 MAE provided assistance to 13 CoCSOAC members and local NGOs to conduct Anti-Corruption Day events across six provinces. The objectives of these events were to maintain momentum from the Million Signature Campaign by drawing the public's attention to the fact that progress on the Anti-Corruption Law had stalled and to maintain pressure on the government to adopt the law, in addition to educating people more generally about corruption issues. Events on the day included public forums, concerts and a media campaign.

At the Phnom Penh event, held at Wat Phnom, H.E. Cheam Yeap, addressed the crowd. This was the first time that any high-ranking government official had been involved in an Anti-Corruption Day event, and indicated a growing acceptance by the government that they need to be seen to be addressing corruption.

On December 9, in 2009 Anti-Corruption Day events took place in nine provinces (Phnom Penh, Kampong Speu, Sihanoukville, Pursat, Battambang, Banteay Meanchey, Oddor Meanchey, Siem Reap and Steung Treng). Activities included a mixture of public forums, concerts, educational material distribution and media programming. The events served as a vehicle to attract media coverage and thus indirectly influence senior RGC officials to further the ACL. Radio was an important part of the 2009 Anti-Corruption Day activities with broadcast of roundtable discussions, quiz shows, International Anti-Corruption Day jingles and interviews with parliamentarians featured. Additionally, MAE conducted a targeted SMS campaign using 'FrontlineSMS', a computer program specifically designed for advocacy campaigns by civil society. A very simple, positive message "We hope you had a happy anti-corruption day" was sent to approximately 2,000 recipients, including Royal Government of Cambodia public officials.

An estimated total of 5,000 students, NGO staff, local authorities, provincial government officials, monks, and general citizens attended events across the country in 2009, while several hundred thousand Cambodians received news and information related to corruption throughout the week as a result of media exposure in print, radio and television. Finally, in cooperation with LAAR, Pact's provincial partners distributed 182,400 pocket guides advertising official fees, 1,580 Clean Hand stickers, 1,392 t-shirts with the Saat Saam website printed on the back and 1,392 caps in their commune either on International Anti-Corruption Day or soon thereafter.

Anti-corruption public forums: Public forums provided an important space for dialogue, where members of the public can directly question or challenge their representatives.

In 2007, MAE provided funding support to CoCSOAC to conduct anti-corruption public forums in 24 provinces and municipalities all across the country. The forums were designed to educate the public on the anti-corruption law and give people from different backgrounds the chance to voice their concerns about the impact of corruption on their daily life, and their demand for serious actions against corruption, including a demand for the immediate passage of an anti-corruption law that meets international standards.

These forums brought a total of 4,000 people - of whom 1,200 were women - together who expressed their support for anti-corruption efforts and to sign or thumbprint the Million Signature treaties. During

these forums, eight members of parliament and 17 government officials, including deputy governors, participated. The forums were reported on Radio Free Asia on nine different newscasts, three times on Radio Voice of America, five times on Radio Voice of Democracy, three times on the Women Media Center's Radio FM 102, two times on Radio FM 93.5, once on National TV Channel, and once on the National TV of Banteay Meanchey province.

In 2008, MAE conducted a further 128 workshops, forums and conferences focused on anti-corruption and/or freedom of information. Additionally, MAE staff and partners served as speakers or panelists in 23 round-table discussions, television and radio talk shows related to corruption. Spokespersons trained by MAE also served in this capacity at an average of five times per month in different locations around the country.

Anti-Corruption Radio Show: A series of radio talk-shows were organized at the same time as the public forums and were aired on the Voice of Democracy (VOD) Radio Show which is broadcast simultaneously on five different radio stations throughout the country, covering 70% of Cambodia's population. The five radio stations that broadcast VOD are Beehive Radio FM 105 based in Phnom Penh, Radio Kleang Moeung FM90.25 based in Battambang province, Radio Angkor Ratha FM 95.5 in Siem Reap province, Radio FM90.25 in Oddor Meanchey province, and Radio FM 88.25 in Kampong Thom province.

Each of the shows were designed to complement the public forum debates and focused a critical anti-corruption issues people wanted to see be covered in the ACL. The theme of the radio-talk show was "Public Expression: the Need for an Anti-Corruption Law", and each featured a panel of experts discussing the topic (the independence of the Anti-Corruption Body, the asset declaration process and witness/whistle-blower protections), and the following week callers were invited to call the show with their questions and comments. The radio talk shows programs also informed the audience of the nature and timing of the public meetings. Thirteen speakers, of whom three were Members of Parliament (including one from the Ruling Party), participated in the talk-shows, and over 90 percent of callers were strongly supportive of an effective, international standard, anti-corruption law.

The Clean Hand Concert: The Clean Hand Concert was a large public event held on May 30, 2009, at the Olympic Stadium in Phnom Penh, designed to draw attention to the slow progress the Government was making in pursuit of an anti-corruption law.

During the concert well-known musicians and comedians entertained a crowd of over 50,000 and publicized the anti-corruption issue. The US Ambassador also spoke. As a result of the concert there was considerable political fall-out. In the days following the concert, RGC publicly criticized the US Ambassador's remarks and a number of articles critical of Pact and the Ambassador appeared in local newspapers, which in turn attracted the attention of television comedians and the international press. Given the highly centralized and autocratic nature of Cambodian politics, this resulted in a number of negative interactions between MAE and lower-level RGC officials.

Following the concert MAE was involved in a number of relationship-building activities in order to mitigate the after-effects. Despite the problems that it caused, MAE felt that the event did highlight corruption. A number of Cambodian's discretely commented to MAE that they were glad to see

someone brave enough to speak out on corruption. Following the event, the Government also started to make a number of public announcements on actions they were taking to address corruption in the Government, and within nine months the ACL was swiftly passed. While this cannot be directly attributable to MAE and the Clean Hand Concert, given the spectacle that resulted from the Clean Hand Concert, it is difficult to discount it all together.

Anti-corruption trainings: MAE hosted a number of trainings sessions, in partnership with CoCSOAC, on anti-corruption in response to requests from different organizations. These included an anti-corruption training session in Battambang at the request of Deutscher Entwicklungsdienst (DED), which aimed to raise awareness on corruption issues and to avoid the corrupt practices among local NGOs that receive funding from DED. According to feedback from these sessions, many of the participants did not realize that they had been participating in corrupt practices and that now they could seek to address these issues in their organizations. Other training sessions were conducted with Australian Volunteers International and nine local NGOs.

Journalist Training: Under ACCAP, numerous journalists were trained to enhance their reporting skills. While MAE tracked the stories published by these journalists and initially intended to pursue similar activities, MAE decided against making concerted effort to repeat this type of activity, noting that it had not resulted in great advances in the number and types of stories produced. However, in May 2010 MAE did conduct a training session under the title of “Avoiding conflict of interest training for journalists” with 12 participants (including one female). The aim of this training was to improve journalists understanding of what a conflict of interest was, with a view to improving reports on the topic.

Transforming CoCSOAC into CISA: To ensure the sustainability of CoCSOAC after the completion of the program MAE assisted the Coalition to become independent, formalize and to legally register with the Government.

After completing a competitive bidding process, MAE selected local NGO, the People’s Centre for Development and Peace (PDP), who was also a CoCSOAC member, to assist with this transformation. The mandate of PDP was to assist CoCSOAC to develop by-laws, register, recruited a coordinator and host the General Assembly to finalize the by-law, vision, mission, and structure of the organization.

The first general membership meeting of CoCSOAC was held on October 9, 2009, at the Phnom Penh Hotel. Thirty-five CoCSOAC members discussed and finalized a new name, vision, mission and structure for the Coalition. The new name for the coalition was the Coalition for Integrity and Social Accountability (CISA), while the vision selected was ‘A Cambodian society with accountability, transparency, integrity, equity and justice in which citizens can live in harmony’. The new mission was ‘Fighting corruption together through capacity building, education, dissemination and advocating for the effective enforcement of laws’.

PDP assisted to recruit a coordinator for CISA and host a General Assembly in early March 2010, where CISA members elected their leadership, developed a strategic plan and receive additional anti-corruption training.

Even though CISA was still in the process of transformation when the anti-corruption law was hurriedly scheduled for review by the National Assembly and it became clear that the Government would not be releasing a draft of the current law, CISA decided they needed to take action. CISA in collaboration with other civil society organizations sent two letters, one to the Council of Ministers and another to the Ministry of National Assembly Senate Relations and Inspections (MONASRI), requesting a copy of the final version of draft anti-corruption law. CISA members also decided to make public their demand that the draft anti-corruption law should be available to the public before debate begins on the law in the National Assembly. In furtherance of this position, CISA submitted an opinion piece to the Phnom Penh Post, which was published on December 23, 2009. The opinion piece focused on pressuring government to demonstrate their commitment to good governance and transparency – which should be hallmarks of an anti-corruption law by holding public consultations that provide a real opportunity for all stakeholders to evaluate and discuss the law before a final vote is taken.

Although unsuccessful in their lobbying efforts, these experiences provided members the first opportunity to act independently as their own coalition and to learn some important lessons.

Capacity Building for CISA: At the end of August 2010, after CISA has been established, MAE ceased direct funding support for CISA, but maintained technical assistance for CISA until the end of the program in September 2010.

On April 1 and on May 21, 2010, MAE hosted two training sessions on conflict of interest for CISA members. Through this training the CISA members developed their understanding of what a conflict of interest is, why it is a problem and how organizations can minimize conflict of interest issues.

On June 23, 2010, MAE assisted members from the CISA steering committee to make a presentation on the meaning of social accountability during the 4th PECSA National Event "Convergence for Social Accountability." The event took place at the Imperial Garden Villa in Phnom Penh and included more than 150 participants from the Ministry of Interior, provincial government, local government, USAID, the Asian Development Bank, the World Bank, local NGOs and Star Kampuchea community networks. During the event participants defined new initiatives and action plans for improving social accountability and good governance in Cambodia. One of the initiatives focused on the strengthening of relationships between good governance actors participating in social accountability networks.

On August 2, 2010, MAE provided financial management training to the CISA Secretariat, to ensuring that the Secretariat was capable of effectively and efficiently managing the day-to-day activities of the Coalition. Following the training the CISA Secretariat drafted financial policies and procedures and submitted them to the Steering Committee, who reviewed the financial policies and procedures before submitting them to the Chairman who, consequently, approved them on August 27. With these policies and procedures in place CISA had a sound base with which to pursue further activities.

MAE also assisted CISA to develop project proposals and secure funding from the Affiliated Network for the Social Accountability East Asia and the Pacific (ANSA-EAP) and the Danish International Development Agency (DANIDA) throughout the final quarter. The grant from ANSA-EAP (US\$30,000) will be used to fund the development training-of-trainer (TOT) training on the monitoring of procurement processes

from September 2010 until February 2011. While the funding from DANIDA, which amounts to US\$12,753, will be used to support a Listeners' Club Project that encourages community groups to listen to and reflect on content the weekly Good Governance Radio show over a five month period from July 2010. MAE assisted CISA with a third unsuccessful application which was submitted to The Asia Foundation as part of the Demand for Good Governance project. In that concept note CISA outlined a program designed to promote transparency in the health system and in the delivery of commune services.

In addition to receiving capacity building from MAE, over 2010 CISA continued to develop more confidence and participate in a number of events that will raise their profile, strengthen its capacity and ensure that they are engaged in important debates related to anti-corruption and social accountability:

- On July 1, CISA attended a workshop on advocacy techniques. The workshop was organized by Star Kampuchea at Baitong restaurant in Phnom Penh. During the workshop participants shared experiences and discussed how civil society organizations could work through networks at national and provincial levels to support advocacy efforts.
- On August 11, the CISA coordinator was a key speaker at a round table discussion organized by the PDP at PDP's office in Phnom Penh. The round table, which targeted youth, focused on good governance and alcohol related issues. About 30 students from different universities attended and increased their understanding of good governance. They were also instructed how good governance can be link to alcohol related issues and how young people can help reduce alcohol problems in their own communities.
- On August 23, CISA attended the Cambodia-Korea-Transparency International Joint Symposium hosted by Transparency International Korea chapter at the Sunway Hotel in Phnom Penh. During the Symposium the fifty participants from national NGOs, international NGOs, Transparency International Korea, Transparency International Germany, the ACU and the National Assembly reviewed the issue of corruption as a key challenge for economic and social development, and shared their point of views, experiences, observation, and ideas on how to best promote transparency, accountability, and integrity for achieving the Minimum Development Goals. During the Symposium, H.E. Om Yentieng, Chairman of the ACU and personal advisor to the Prime Minister of Cambodia, gave a speech outlining the achievements of ACU to date, while H.E. Mr. Son Chhay, Member of the National Assembly of Cambodia, shared a history of fighting corruption in Cambodia. Additionally, the Country Representative for Pact, Ms. Georgia Beans, provided a 15 minute overview of the MAE program and successes.

While these activities are important in laying down the foundations for CISA's continued sustainability, CISA is still very much in its infancy and may struggle without external technical assistance.

Despite the challenges, a number of recent developments could be advantages for CISA in the future: the passage of the Anti-Corruption Law, the formation Anti-Corruption Unit, the World Bank's interest in funding anti-corruption efforts, and the Government's newly launched Democratic Development Program. All these will need a strong participation from the non-state actors and CISA, as the only group

of NGOs in the country with technical capacity and strong anti-corruption background would be an ideal actor. There is also a possibility for CISA to become the Cambodian Transparency International Chapter.

Freedom of Information: Over the past four years MAE has worked closely with the Freedom of Information (FOI) Working Group to conduct a FOI campaign aimed at creating the will and demand to pass relevant FOI laws that compliment the Anti-Corruption Law and promote greater access to information. As part of this campaign MAE and the FOI Working Group drafted a FOI policy paper, develop and implement training on FOI, create an FOI talk-back radio show, developed FOI IEC materials and developed an FOI curriculum.

Development of the FOI Policy Paper: Under a Memorandum of Understanding signed by MoNASRI and USAID on June 21, 2007, MAE hired Professor Rick Snell, a globally recognized FOI expert, and a local consultant, Dr. Sau Sisovanna, to assist a MoNASRI-led inter-ministerial drafting team develop an international standard Access to Information Policy Paper. The inter-ministerial team consisted of MoNASRI, the Ministry of Defense, the Ministry of Information and the Ministry of Justice. By conducting a broad stakeholder consultative process the consultants aimed to educate officials to understand FOI principles, create ownership of the Policy Paper and get help in customize the draft policy paper to Cambodian conditions and norms. The draft FOI Policy Paper was completed by the Drafting Team led by MoNASRI later in August 2007, but the draft Policy Paper has since stalled and had not been submitted to the Council of Ministers by the end of the program.

Throughout the drafting of the paper, civil society were given the opportunity to influence the draft, with two NGO FOI Working Group joining select drafting team sessions and sessions organized specifically for CSOs and media feedback. Although it remains to be seen what the Government will do next on FOI, the FOI Working Group met three times during the last quarter of the MAE program (July, August, and September, 2010) to select representatives who will receive training on FOI and updates on the progress of the Policy Paper, and to draft a strategy for furthering the development of an FOI law that meets international standards.

Freedom of Information Training: MAE organized numerous FOI related workshops and trainings over a four year period designed to promote awareness of FOI and its importance in tackling corruption amongst NGOs and local government officials:

- From July 10, 2007, until February 23, 2008 they hosted a series of seven workshop and forums presenting the FOI Policy Paper to civil society organizations, the Government, media organizations and donors with a view to refining the Policy Paper and creating a greater demand and will to pass Freedom of Information legislation. Following these sessions the Policy Paper was handed-over for final approval by the Council of Ministers. Once approved, the Policy Paper would be used as a foundation for the drafting of a Freedom of Information Law.
- During 2008 MAE, as a member of the FOI Working Group and in partnership with other members of the FOI Working Group, organized five FOI workshops in five provinces: Kampong Cham on March 31, Svay Rieng on June 20, Takeo on August 26, Siem Reap on October 6, and Banteay Meanchey on September 23. These workshops aimed to raise awareness of FOI

amongst key stakeholders including provincial government officials, commune councilors, district councilors, provincial councils and local NGOs. Through this activity MAE aimed to educate and build political will amongst sub-national governments, who also suffer as a result of poor access to information, to create stronger pressure on the national Government to take more action on FOI reform. Further, by educating these officials prior to passage of an FOI law, means that they will be more informed when FOI legislation is passed. After the training a number of these officials expressed a desire for better reform in this area.

- During 2009, as a member of the FOI Working Group, MAE organized four FOI workshops in four provinces: Kampong Chhnang on June 10, Kampong Thom on July 31, Kampot on October 20, and Prey Veng on October 23. These workshops aimed to raise awareness of FOI issues among the 77 attendees, which included provincial government officials, members of commune councils, newly elected members of district and provincial councils, local NGOs, students and interested citizens. Speakers at these workshops discussed the meaning of FOI and presented real cases demonstrating the benefits of public information.
- From July 28 until July 30, 2010, MAE with FOI the Working Group and Advocacy and Policy Institute delivered training to members of FOI Working Group in Sihanoukville. This Training of Trainer training focusing on Access to Information was designed to build the capacity building of FOI Working Group members to implement awareness raising training and advocate for freedom of information reform.

FOI Radio Talk Shows: MAE in partnership with the FOI Working Group and API conducted a number of FOI related radio talk shows over the course of the project, to raise awareness of FOI issues and the need for appropriate legislation amongst the general public:

- In 2008, MAE, API and the FOI Working Group conducted 12 radio talk shows designed to raise general awareness of FOI. These talk shows were aired on the Voice of Democracy (VOD) (broadcasted on Sarika FM 106.5 MHz), ADHOC's Radio program and Voice of Civil Society (VOC) (both broadcasted on FM 105 MHz).
- In 2009, MAE, API and the FOI Working Group conducted ten FOI radio talk shows on the Voice of Democracy (VOD) (broadcasted on Sarika FM 106.5 MHz), ADHOC's Radio program and Voice of Civil Society (VOC) (both broadcasted on FM 105 MHz). These talk shows were part of a coordinated effort, which also included the production of educational material, to raise awareness and demand for FOI reform. By the end of the series, callers to the show had a marked improvement in their ability to articulate their problems regarding access to information, indicating that the listeners had learnt about FOI from the show.
- In 2010 MAE staff continued to provide technical expertise to the FOI Working Group and served as a guest speaker on three radio talk shows with the following topics: "Duty of Public Officials and Public Services" broadcast on February 23, "Conflict of Interest" on March 17 and "Access to Information Day" on September 28. The talk shows were broadcast on the VOD, Women Media Center 102 MHz, and Voice of Civil Society (which can be received on 105 MHz,

90 MHz, 90.25 MHz in Battambang, 88.5 MHz in Kampong Thom, and rebroadcast on 95.5 MHz in Siem Reap).

FOI IEC Materials and FOI Curriculum: MAE in conjunction with FOI Working Group members and API produced numerous FOI IEC materials including a FOI information brochure, a FOI poster, a FOI song, a FOI *chapei*, a FOI *ayai* and two dramas relating FOI. The IEC materials were aimed at increasing the people awareness of FOI and promoting the understanding on FOI by public officials.

In addition to the FOI IEC materials, a FOI curriculum was also developed by FOI Working Group with assistance from MAE. This curriculum was designed to help strengthen the capacity of FOI Working Group members to conduct awareness raising and advocacy efforts related to the adoption of FOI legislation in Cambodia.

Cambodians for Revenue and Resource Transparency: The Cambodians for Resource Revenue Transparency (CRRT) is a watchdog and advocacy group that was established with assistance from MAE and Oxfam America. The members of the CRRT are local NGOs that are committed to extractive industry transparency (especially oil). The original four members were the NGO Forum of Cambodia, the Center for Social Development, the Youth Resources for Development (YRDP) and the Development Partnership for Action (DPA). In the initial stages these members were supported by Pact, Oxfam America, and the Norwegian People's Aid (NPA) to develop the Coalition and undertake activities. During the formative period of CRRT, MAE played a leading role in providing organizational and capacity building assistance to the group which have seen it localize, legally register and develop its own strategy for future activities.

Since its establishment the CRRT has actively engaged in a number activities aimed at further extractive industry transparency. These activities have included informal discussions with policy makers and donors on issues such as the RGC's attitude to joining the Extractive Industry Transparency Initiative (EITI) and the contents of draft petroleum legislation; the hosting of workshops on extractive industries with local stakeholders; linking to international EITI efforts and conferences; and conducting an advocacy campaigns, which have included appearances on radio and television.

Although the CRRT formalized as an independent Coalition in January 2008, MAE provide technical and advisory support to the CRRT up until the end of the program. During this period, MAE has been involved in the development of an extractive industries database, the drafting a media strategy and support for provincial awareness-raising public forums. These activities were designed by CRRT to maintain pressure on the government to deal with extractive industries transparently.

The CRRT has made considerable progress establishing itself as the civil society authority on extractive industries and has engaged with the public and the government effectively; earning the respect of the Government in a high sensitive area. In the last year the CRRT organized a series youth and public forums on 'Oil & Gas Management in Cambodia' to raise people awareness about the natural resources management. Key speakers at these events included H. E. Cheam Yeap and H.E. Dr Hang Choun Naron.

The CRRT is the only and non-competitive group of NGOs in the public eyes that has the potential to become a strong and professional advocacy group and watchdog of extractive industry management in

Cambodia. Consequently, the Coalition has been able to attract substantial donor support for its activities.

Nevertheless, the technical capacity of the CRRT especially in extractive industries, and especially in oil, is still limited. Organizationally and individually, none of the CRRT members has either extensive experience or knowledge of extractive industry and this remains a challenge for the current CRRT membership. However, the CRRT has been working hard to address this by sending staff to a number of training sessions overseas and developing a plan to improve their capacity.

Activity Area 2: Work with the Royal Government of Cambodia to develop will and the capacity to implement and enforce anti-corruption reform

This section presents MAE activities related to strengthening the capacity of the RGC's newly-established Anti-Corruption Unit (ACU), which consists primarily of training workshops provided to ACU between February and July 2010.

Background to Pact Institutional Strengthening of ACU: As mentioned earlier in this report, for the past four years, MAE has actively supported civil society and media efforts to both pressure and support the RGC to pass the Anti-Corruption Law (ACL). On October 1, 2009, the draft Penal Code, which contains all of the criminal elements outlined in the draft ACL, including definitions and penalties, was submitted to the National Assembly. On December 11, 2009, the draft ACL was approved by the Council of Ministers. The draft ACL was then passed by the National Assembly and the Senate in March 2010. Full implementation of the law is tied to enactment of the Penal Code, which goes into effect in December 2010.

The new law gives the existing Anti-Corruption Unit (ACU) a firm mandate to monitor and investigate corruption. This increase in responsibilities makes it all the more important to address any deficits in the staff capacity of the ACU. In response to a request delivered directly to USAID from the ACU, MAE identified appropriate trainers and submitted a proposed schedule of capacity building trainings for the five priority areas that have been jointly identified by the ACU, MAE and USAID. These areas are: 1. Survey Design; 2. Asset Declaration; 3. Complaints Mechanisms; 4. Case Management; and 5. Investigations. USAID submitted the proposed training schedule to the ACU in mid-January 2010 and formal written approval to proceed was received from H.E. Om Yen Tieng on February 3, 2010. In July 2010, a sixth capacity strengthening activity was added: strategic planning.

ACL Provisions: In comparison to many other countries, Pact's lead trainer Mr. Tony Kwok believes that the law is not overwhelmingly inadequate. While this is not a ringing endorsement, the law does provide the ACU with the ability to investigate and to arrest; not many ACUs are provided with the latter power. According to Mr. Kwok, one good point within the law is the inclusion of the offense of 'illicit enrichment' which is often overlooked. However, the Cambodian law does not allow for prosecution of the offense of illicit enrichment, just for seizure of the asset. This loophole may perpetuate feelings of inequity when the public does not see these perpetrators go to jail.

Mr. Kwok views the asset declaration (AD) provisions in the law as distinctly problematic, primarily because of the extensive scope of coverage that he believes creates an unnecessary burden (though not because the AD system would require NGO leaders to disclose). The Cambodian law requires disclosure only of a person's own assets, not of their spouses or children, which is another major loophole. The provision should be that assets under a person's control are disclosed. Similarly, there is no verification process before the asset declaration form is filed away, not even a quick look to ensure that the form has been signed by the declarant – the ACU is simply provided with a sealed envelope.

If this process is what the ACU actually carries out once the law goes into effect, this issue would thwart the entire purpose of the AD system, which is to pinpoint targets for investigation, especially for the offense of illicit enrichment. However, the law does have a catchall phrase allowing the head of the ACU to open AD forms for purposes of investigation. There will be an opportunity to strengthen and clarify this process during the sub decree/regulation-writing process. The expectation is that the AD system is being presented in this non-threatening way in order to appease higher-ranking government officials' fears.

ACU Staffing: Using the Hong Kong Independent Commission Against Corruption (ICAC) as a standard of excellence, the ideal anti-corruption agency will be staffed with approximately one investigator for every 200 civil servants. When the capacity strengthening activities began in February 2010, the ACU was staffed with only 60 people divided into four basic units:

- Administration, Finance and Human Resources;
- Education and Prevention;
- Investigations; and,
- Law Enforcement Monitoring.

The lead trainer considered the ACU woefully understaffed. While the exact number of civil servants in Cambodia is unclear (a census was recently completed), most estimates put it at 160,000. This means that each ACU staff member is responsible for more than 2600 civil servants. While ACU has been recruiting staff throughout this year, it is not yet clear how close the agency will get to reaching the ideal staffing pattern.

ACU Resources: Providing an adequate budget can have a dramatic impact on an agency's ability to fight corruption. In Hong Kong, the annual budget contribution to the ICAC is 0.38% of the national budget. The typical budget for an anti-corruption agency starting up in Asia is just 0.01% of the national budget. While the budget for the Cambodian ACU is unclear, the head of the unit has indicated that the Prime Minister has given him a free hand and that he simply needs to make a request and it will be fulfilled. There have been unofficial references to a start-up budget of \$5 million.

Anti-corruption resources make a difference. The lead trainer reports that in 2009, Malawi was ranked 115 in the Corruption Perception Index (CPI). Following commitment by its Executive, Malawi's Anti-Corruption Commission's budget was pegged at 0.33% of the national budget – in line with Hong Kong. In 2009, Malawi was ranked 89 on the CPI, leaping over almost 30 other countries in just one year.

Initial Capacity Assessment of the ACU: Prior to the training, Pact recommended to the ACU that an assessment be conducted in order to more accurately pinpoint the training needs of the ACU. At that time, the head of the unit declined the offered assistance as he felt that he had a full understanding of the unit's training needs. During his training, therefore, Mr. Kwok conducted an informal needs assessment and engaged in extensive conversations with the head of the unit and ACU staff regarding steps forward. While staff members have ranks to differentiate themselves within the basic hierarchy, at the start of this project they did not have individual job descriptions, only descriptions for the responsibilities of each unit.

It was clear that the ACU staff would require a great deal of training and capacity building in order to perform their new roles effectively. For many attendees, the initial training activity was their first exposure to even the most basic principles in understanding how an anti-corruption enforcement agency works. Their questions and comments suggested that most attendees lacked basic understanding of administrative functions, conflict of interest, investigation techniques or even an understanding of criminal law. Significantly, no ACU staff member had received or even read a copy of either the draft Anti-Corruption Law or the new Penal Code prior to attending the training. In response, MAE immediately provided copies of both laws which have served as the basis of discussion during the trainings.

Meetings & Presentations with ACL stakeholders: In addition to meetings between the MAE Chief of Party and ACU to discuss the development of the training plan, a number of meetings were held with the unit and with stakeholder agencies to discuss how best to strengthen the capacity of the ACU. A number of the meetings are highlighted below.

- United Nations Office on Drugs and Crime (UNODC) Bangkok: The MAE Chief of Party met with key anti-corruption and Cambodian legal experts at the UNODC in Bangkok on January 8 to secure the necessary expertise and establish dates for training.
- ACU: The lead trainer and MAE team met with H.E. Om Yen Tieng, head of the ACU, and key ACU staff on numerous occasions to discuss the trainings and also to discuss steps and policies needed to ensure that the ACU becomes a strong anti-corruption agency.
- ACL Presentation to Members of Parliament: In advance of the National Assembly's debate on the draft anti-corruption law, the United Nations Development Program (UNDP) organized a dialogue for interested Members of Parliament and civil society organizations on Tuesday, March 9, 2010. At the forum, MAE provided an overview of the key provisions of the draft anti-corruption law along with an analysis of the law in comparison to international standards. After

the presentation, all participants were provided with an opportunity to share comments and exchange views. The dialogue was attended by five Members of Parliament, four development partner representatives and over 20 civil society organizations.

- **Senate Committee Presentation:** In advance of the Senate's consideration of the draft anti-corruption law, MAE provided testimony at a briefing by civil society to the Senate on March 16, 2010. Sixteen senators and four senate staff participated along with seven civil society representatives, primarily from Pact Cambodia, the Cambodia-Canada Legislative Support Project (CCLSP) and the United Nations Office of the High Commissioner for Human Rights (UNOHCHR). The briefing centered on a comparison between the draft law and international standards, and included experiences based on anti-corruption units in the region. During civil society's testimony, particular focus was drawn to the need for the ACU's independence, appropriate witness/whistleblower protection and a requirement that the ACU make some of its reports available to the public. Further suggestions included the creation of an asset declaration regime that more appropriately targets senior government officials, their spouses and children. The Senators expressed their appreciation for the presentation and acknowledged that a number of the helpful suggestions would improve the quality of the draft. During the hearing, it was clear that the Senate had no resources or capacity to review the law.
- **Cambodian Independent Teachers Association (CITA):** The lead trainer met with CITA to share his experience on how the civil society can play a major role in combating corruption. He suggested that as a start CITA approach the new head of ACU to propose a one-day partnership workshop with staff of both organizations present to discuss a strategic partnership plan.
- **Coalition for Integrity and Social Accountability (CISA):** On March 31, 2010, CISA members met with lead trainer Mr. Tony Kwok to discuss potential activities that CSOs interested in fighting corruption could consider. Mr. Kwok made a number of suggestions, including that CISA should build a partnership with ACU and find ways to support their work, when possible.
- **Meeting with Individual Donors:** In-between workshops and during the lunch hours the lead trainer had the opportunity to meeting individually with various donor agencies to drive home the importance of providing adequate support to the ACU. Meetings were held with USAID, the World Bank, the Asia Development Bank and DANIDA. At all these meetings, Mr. Kwok briefed donor representatives on his initial perceptions of the challenges to anti-corruption work in Cambodia. He emphasized that the first year of the ACU would be the most important time in Cambodia in the fight against corruption and that donor agencies should make a concerted effort to jointly enable ACU to make a good start and to make an impact.
- **Chair and Vice Chair of National Council Against Corruption (NCAC):** On July 6, 2010, Mr. Kwok met with the NCAC Chair and Vice Chair (who is also the head of the Ministry of National Assembly and Senate Relations). The meeting served mainly to clarify the role of the NCAC, introduce the concept of NCAC sub-committees as practiced in Hong Kong and review the key elements of Cambodia's three-pronged anti-corruption strategy. Mr. Kwok stressed the

importance of ACU receiving adequate funding, which he estimates should be at no less than 0.38% of the national budget.

- **Minister of Justice:** On the same day Mr. Kwok also met with the Minister of Justice, the Phnom Penh Public Prosecutor, two Under Secretaries of Justice, and one General Director. The aim of the meeting was to advocate to a Memorandum of Understanding between the Ministry of Justice and the ACU. Given the difficulty of collecting evidence in corruption cases, Mr. Kwok stressed the importance of creating a panel of judges and a panel of special prosecutors for corruption cases.
- **ACU Donors Meeting:** On July 14, 2010, MAE assisted the ACU in organizing its first donors meeting. The purpose of the meeting was to inform donors about the strategic planning exercise, ACU plans and resource needs and the pending issuance of sub-decrees related to the ACU. More than 14 representatives from donor agencies attended the meeting.

Media Coverage: Throughout its work with the ACU, MAE organized or assisted the ACU to organize media presence. Press conferences were held at most of the events, including a large press conference with participation of more than 40 media outlets following the July donors meeting. Additionally, Mr. Tony Kwok gave several interviews to the press highlighting the importance of adequate resourcing and high performance during the ACU's first year in order to meet public expectations.

Capacity Strengthening Activities: MAE provided six different capacity strengthening activities to the ACU between February and July 2010. The trainings were designed to provide participants with an overview of the elements needed to run an effective anti-corruption enforcement agency. Further trainings to build specific skill sets will be needed in the future. To provide the training, Pact contracted experts in their field and/or with the Cambodian context:

- Lead trainer Tony Kwok served on Hong Kong's Independent Anti-Corruption Commission (ICAC) for 27 years, retiring at the rank of Deputy Commissioner in 2003. Since that time, he has served as an advisor to anti-corruption agencies in 23 countries. Mr. Kwok led the case management and asset declaration training as well as the strategic planning exercise.
- Researcher Christine Joker Lohrmann, who conducted the research design workshop, is the original author and designer of the 2005 Corruption and Cambodian Households: Household Survey on Perception, Attitudes and Impact of Everyday Forms of Corrupt Practices in Cambodia study.
- Mr. John Pike and Mr. Ayo Griffin, two attorneys with backgrounds in conducting fraud investigations, devised practical exercises to drive home the teaching of Mr. Kwok in the case management and asset declaration workshops.
- Mr. Chris Batt, Anti-Money-Laundering Advisor for the Mekong Region, led the financial investigations training and mock trial exercise conducted by the United Nations Office against Drugs and Crimes (UNODC).

- MAE Chief of Party Victoria Ayer, developer of the Pact advocacy curriculum, led sessions on conducting a public education campaign.

The content of the training was largely based on the three-prongs of the Hong Kong model that include Deterrence, Prevention, and Enforcement.

a. Survey Design Training (February 17-19)

The first training session for the ACU staff was on corruption survey design and was conducted by Ms. Christine Joker Lohmann February 17 to 19 and aimed to inspire the ACU to use surveys to inform their anti-corruption work in the future. Topics covered included:

- Review of qualitative and quantitative methodologies;
- Designing survey questions;
- Who do we survey and how;
- Challenges and limitations of surveys; and,
- Data analysis, reporting and dissemination of survey results.

The training provided participants with strong grounding in basic survey concepts, including inception and design, field work, analysis and drafting of the final report. Ms. Lohrmann used a combination of teaching and training styles including lectures, personal experience and group work. The distinction between qualitative and quantitative methodologies, for instance, was made clear through practical exercises and role plays. Importantly, the participants left with a deeper understanding of how conducting or commissioning such a survey could strengthen their work and increase public confidence in their institution. The training used the publication *Corruption and Cambodian Households: Household Survey on Perception, Attitudes and Impact of Everyday Forms of Corrupt Practices in Cambodia (2005)* to inform the discussion.

Thirty-eight participants from the ACU and two from the National Counter-Terrorism Council (NCTC) attended the training. The positive impressions and anecdotes that MAE staff gathered over the three-day training were supported by the positive written evaluations by participants. Overall, 38% of respondents rated the training as excellent, 35% as very good and 27% as good. Almost 100% found the information useful to their work. The most common additional comment was that more training (and more time) was needed. Participants also gave high marks for the lead trainer.

b. Complaints Mechanisms and Case Management Training (March 22-26)

The second training for the ACU was on Complaints Mechanisms and Case Management and aimed to help ACU staff understand how to collect and process complaints in an efficient manner. The workshop was conducted by Mr. Tony Kwok and focused on skills needed to properly manage cases, protect witnesses and begin the investigation process. Mr. John Pike and Mr. Ayo Griffin, two attorneys with backgrounds in conducting fraud investigations, led practical sessions that helped ACU staff understand

how to prioritize complaints and sift through evidence. Participants were given the opportunity to apply their learning through practical exercises, including trial preparation.

The main topics of the workshop included:

- Definition, types and causes/effects of corruption;
- Success factors of an effective anti corruption agency and for effective enforcement;
- Complaint report system;
- Interview techniques;
- Writing a complaint report;
- Rapid response to complaints – entrapment;
- Case management and supervision systems; and
- Ensuring ACU staff integrity.

Attendance at the training markedly increased over the first workshop, with around 60 people attending. The increase was due to the presence of staff from the ACU's Investigations Unit, most of whom had not attended the previous training. As a result of the training, ACU staff will understand how to handle and track complaints, attract and encourage complaints, protect whistleblowers, launch an investigation and write up a complaint report.

The positive impressions and anecdotes that MAE staff gathered over the three-day training were supported by equally positive written evaluations. Overall, 24% of respondents rated the training as excellent, 71% as very good and 5% as good. As with the first training, almost 100% indicated that the information was useful to their work. The most common additional comment was that more training (and more time) was needed. Participants also gave high marks for the lead trainer.

c. Asset Declaration Training and Practical Exercise (March 29-April 1)

From March 29 to 30, Mr. Kwok provided the third training in the series on "Asset Declarations." This training focused on how to develop an asset declaration system that is manageable as well as useful in the ACU's investigative duties. Topics covered in the training included:

- Principles underlying asset declaration, objectives & limitations;
- Design of the AD form;
- How to enforce compliance; and,
- Asset tracing.

On March 31, Mr. John Pike and Mr. Ayo Griffin again delivered complimentary practical sessions that focused on the elements of an ethical workplace and how to handle ethical dilemmas. For the remaining day and a half, MAE Chief of Party Ms. Victoria Ayer delivered a communications training to help the ACU staff understand the basic principles of designing and conducting public education campaigns to assist in any future public outreach.

Attendance at the training remained steady with around 60 people attending. As a result of the Asset Declaration training, staff learned to design forms and systems, balance public disclosure with privacy concerns and engage in verification processes/information audits. Once again the response from attendees was very positive, with 93% of respondents to a post-survey evaluation rating the workshop as very good or excellent.

d. Financial Investigations Training (April 21-22)

At the request of MAE, on April 21 and 22 Mr. Chris Batt, Anti-Money-Laundering Advisor for the Mekong Region for the United Nations Office against Drugs and Crimes (UNODC), conducted a workshop for the ACU in order to prepare them in financial investigations issues and money-laundering. This training was provided at this particular time to prepare ACU staff so they could participate fully in the UNODC-organized money laundering mock trial (see below) and explored investigative techniques to track and trace assets (primarily in bank accounts), methods for identifying suspicious transactions and net worth analysis.

The training topics included:

- Principles underlying financial investigations;
- Use of financial intelligence and evidence;
- Understanding money laundering;
- Asset seizure;
- Case management; and,
- Role and function of the Financial Intelligence Unit.

The 83 participants in this training included ACU, Council of Ministers, National Counter-Terrorism Council and Cambodian Human Rights Committee staff. According to the feedback forms collected by MAE, 94% of the participants rated the quality of the training and the usefulness of the training as either 'excellent' or 'very good.' Interestingly, just below half of respondents indicated that they did not have a bank account, which explained the lack of basic financial comprehension demonstrated by a number of the participants during the training. Any future activities of this kind will need to take this into account.

e. Money Laundering Mock Trial (April 26-30)

The Law on Anti-Money-laundering and Combating the Financing of Terrorism was promulgated in Cambodia in 2007. In January of the following year, the Financial Intelligence Unit (FIU) was established

to handle suspicious transaction cases and in late 2009, the Canadian Government funded the UNODC to hold a mock money-laundering trial in Cambodia. Facilitated by a former police officer and a former investigating judge, the mock trial took place April 26-30 at the Ministry of Justice. The objective of the mock trial was to create a training environment that would enhance understanding and build capacity in relation to cases of corruption and money-laundering offences. Two weeks prior to the trial, organizers met with each government institution to explain the methodology and criteria for selecting participants. To make the mock trial realistic, a case was developed adapted to the local context. All documents produced were reviewed against the background of local laws, protocols, judicial procedures and evidential admissibility.

The centerpiece of the trial was a money-laundering offense involving a number of individuals. The exact number of offences and offenders involved was debated during the trial. Participant arguments were based on the extent of local anti-money-laundering legislation, as well as the interpretation of the law by the various participants. The first two days were spent reviewing and discussing the evidence and setting up a system to chart the exhibits. The final days were spent on judging the case. Rather than conclude with one judgment, participants were divided into six different groups and each one was charged with reflecting on a specific question that would likely have been brought up in a genuine case.

More than 40 participants from the judiciary and law enforcement agencies attended, including police officers, prosecutors and judges as well as members of the ACU and of the newly-established FIU. The exercise was important because to date there has never been a full prosecution in court of a money-laundering offense in Cambodia. Participants in the mock trial admitted that they had never investigated or judged a money-laundering case and they lacked a clear understanding of money-laundering. As mentioned in the previous section, a week before the exercise, UNODC conducted two-day workshop on financial investigations for participants from the ACU.

The mock trial was very successful, with 10 members of the ACU participating. Participants remained enthusiastic throughout the week and asked many relevant questions. With guidance from the facilitators, they managed to work through the case to its conclusion. The feedback for the exercise was very positive. The majority of participants were unfamiliar with money-laundering at the start but by the end they expressed having a sound understanding of the topic. Even though some felt that the investigation techniques were sometimes complex, they were ready to explore money-laundering investigations on their own. The teaching methodology was particularly appreciated.

One of the aims was to promote cooperation among law enforcement and judicial agencies. The mock trial brought together police officers from the departments of Interpol, Economic Crime, Drugs Department and Counter Terrorism, as well as prosecutors, judges, ACU and FIU staff together to work on a case. The exercise was successful in emphasizing the need to work together in order to secure warrants and discover essential documents on a case. It also highlighted the complementary character of the ACU with other law enforcement agencies.

f. ACU Strategic Planning Exercise (July 10-12)

The ACU strategic planning exercise took place July 7-9 and was led by Mr. Tony Kwok. The presence of top leadership at every session likely ensured attendance of all staff throughout. According to Mr. Kwok, attendance of all staff at an anti-corruption unit's strategic planning exercise is rare. He personally had never experienced it; in most cases only the top leadership attends.

The trainers sought to promote a participatory approach. This proved to be challenging because of the lack of expertise of the majority of ACU staff in comparison with the wealth of experience of the ACU leadership and the MAE lead trainer. To ensure that all had opportunity to voice their views, participants were divided into small groups by rank to avoid domination of the discussion by high ranking officials. This strategy proved successful – particularly as the most senior staff worked in a separate room, creating an atmosphere in which lower ranking staff could speak up without feeling self-conscious.

During the exercise the ACU staff refined their mission statement and outlined an action plan. Participants discussed the challenges facing the new ACU and considered the followings factors essential to ensure its success:

- Adequate funding and resources;
- Sufficient staff with professional training;
- Clear need for modern technical equipments and IT facilities;
- Security and protection measures for its staff and witnesses;
- Support and participation from the media and civil society organizations; and,
- Need for the support of the Public Prosecutors and Judiciary to ensure effective law enforcement.

ACU identified the following priority activities for the next six months:

- Set up a working group to prepare a new budget suggesting that the ACU budget be pegged to the national budget;
- Establish a new organizational structure with appropriate accommodation;
- Establish a 24-hour reporting hotline, launch a major campaign to encourage the public to report corruption and build capacity for rapid response to complaints;
- Set up major investigation section to focus on investigation of “big fish” cases;
- Conduct a workshop for ministries and other agencies to develop their own anti-corruption plans;
- Create an ACU Website;
- Introduce moral education in schools;

- Establish a corruption prevention unit;
- Publish an ACU quarterly journal for wider circulation;
- Establish a media liaison unit to promote media support;
- Establish a computerized case management system;
- Launch the asset declaration system;
- Recruit new staff and conduct professional training for new recruits; and,
- Procure technical equipment for technical and physical surveillance.

In all 100 participants attended the workshop. While this created logistical challenges, the large group was manageable. The workshop was successful because it gave the entire ACU staff members their first overview of their agency's mission. Participants often commented that they were not aware of what others outside their immediate department did. It also gave staff an opportunity to express themselves among their peers. While they were timid doing so in the large group, they had a lot to say in the small groups and some were quite vocal. The exercise also served to encourage the ACU Chair to practice getting input from staff.

The work of the small groups was then collated by the MAE team and fed back to the entire group in plenary discussion. Members of the MAE team acted as recorders for the groups. Small group inputs for the day were integrated and translated so that English and Khmer versions of all the work could be distributed on the following day. Final inputs were collated into an action plan and handed over to the ACU for its use.

MAE Observations of ACU:

a. Political Sensitivity of Performance Measurement

Although there was a degree of trust and respect, the relationship between MAE and the ACU remained very formal throughout the period of collaboration. In all likelihood, the ACU will need to establish itself and demonstrate an impact in fighting corruption before it will begin to feel comfortable cooperating with a non-governmental organization. One example was an excessive sensitivity regarding MAE's corruption perceptions survey, a survey that has been conducted twice before in Cambodia (in 1998 and 2005) without causing any waves. Another example was the refusal to allow MAE to conduct a training needs assessment and its lukewarm reaction to standard workshop pre- and post-testing.

b. Leadership Commitment to Capacity & Team Building

At the same time, the ACU top leadership has demonstrated a strong commitment to capacity building of staff. This commitment is evident in the consistent attendance of the leadership at every event as well as the insistence of including as many ACU staff as possible in every training activity. As one workshop report states "It is noted with interest that the two key leaders of ACU had been taking turns

to be present throughout the two workshops, sometimes both together. Both appeared to be extremely receptive to the inputs and during recess, had approached me for questions and clarification.”

The strategic planning exercise was not an easy process either for the ACU leadership or the MAE facilitation team. Yet the ACU head could have opted for an easier process in which only a dozen of the top leadership gave input into the strategic plan. The fact that he did not suggests that under the autocratic outer shell lies a vision of a strong team in the future in which all members can equally participate in strategic planning. Even though there is a strong likelihood that the final official ACU strategic plan is mainly the product of the top leadership, there is every reason to suppose that as the staff grows in capacity the participatory planning approach will become more meaningful.

Additionally, the lead trainer indicated that he felt a much greater willingness by the head of the unit to engage in robust discussions of new ideas. Particularly important was that the head of the unit seemed keen to create mechanisms that will ensure the internal integrity of the ACU and methods that will encourage public complaints. During one of the workshops H.E. Om Yen Tieng made an impromptu speech exhorting staff to follow every word and pay close attention to this training. He has committed significant personal time to the training, furiously taking notes and attending virtually every session. He also approached the lead trainer with direct questions and arranged for a specific and lengthy briefing over lunch.

c. ACU Staff Skills

The first training provided MAE allowed a closer look at the composition and capacity of the ACU staff. As expected, the staff members’ skill level was quite low. Prior to this training, staff had not received any systematic professional training of any kind. A select number of staff had traveled to programs in neighboring countries but their selection had been driven more by their proficiency in English than in developing the skills needed for their job. It was also obvious that it was the first time that many staff had interacted with each other for any length of time – many did not know each others’ names.

Since the beginning, participants embraced the training with enthusiasm – there have been no issues regarding attendance or participation. According to one evaluation, 95% of attendees found the training course “very good” or “excellent.” Most additional comments include that more training is necessary, particularly on investigations. Participants readily acknowledge that they need extensive training, guidance and support to meet the demands of a fully functional anti-corruption unit. Of particular note, is that they feel that they lack knowledge in conducting investigations and skills required in taking complaints properly. Almost 70% of participants listened to the trainings exclusively in Khmer, which means that this is the first time they have heard many of the technical terms used or techniques described. Extensive application of these new skills in practical settings will be necessary before proficiency can be gained, let alone mastery.

While the MAE team was not familiar enough to the ACU to measure changes in skill levels, a notable change was the level of confidence of many of the staff. The trainers noted that participation in the six training activities served to visibly increase staff confidence.

d. ACU Staff Attitude Improvement

From the perspective of the MAE team, the biggest change that occurred during the collaboration between MAE and the ACU related to the behavior of the ACU staff towards each other and towards MAE. There was a palpable change in ACU staff attitude, particularly among mid-level staff, after the second training. MAE's partnership approach to working with the ACU was clearly appreciated. One ACU staff member commented to a MAE staff member that "before this training, we were like water and oil. Now, we are like family." Throughout the workshops MAE continued to note a genuine desire by the participants to do their job effectively and to combat corruption in Cambodia, but also the need for further training and support for the unit for this to occur.

Future Considerations: During the July ACU donors meeting, Mr. Kwok strongly recommended that all donor agencies give their maximum support in the coming few months to assist the ACU to make a good start. The following are the areas where the donor agencies can consider offering their assistance:

- Equipment, e.g. computers and report centre communications equipment.
- Expertise in the drafting of an operational manual.
- Publicity expenses for launching the commencement of ACU operations.
- Public education projects, including essay, slogan and poster competitions, integrity theme song contest, inter-university debates on corruption related topics, TV Integrity Night, etc.
- Design and launching of an ACU website.
- Computer system and expertise required for the setting up of the Asset Declaration system
- Induction training of ACU recruits.
- Overseas training/visit of ACU officers.
- Expert advisor to ACU.
- Staging of a partnership workshop between ACU and the civil society organizations.
- Sponsoring of the selected projects to be implemented by civil society organizations arising from the above partnership workshop.
- Staging of national seminar anti-corruption action plan workshop (described above).
- Partnership seminar between ACU and individual government agencies.
- Integrity training to government agencies.
- Launching of corruption prevention project in individual government agencies, in partnership with ACU.
- Introduction of integrity education package for schools and colleges.

- Capacity building for prosecutors engaged in corruption trials.
- Judiciary reform in terms of setting up a special panel of judges, and enhancing its efficiency and ability to effectively deal with corruption trials.

Next Steps: At the conclusion of the final workshop covered under this reporting period, Mr. Tony Kwok suggested activities for the ACU to organize as soon as reasonably possible. These include:

- **Civil Society Strategic Partnership Workshop:** The purpose of the workshop would be to identify all future possible projects for civil society organizations (CSOs) to participate in combating corruption in partnership with ACU. The workshop will be a demonstration of the government political will and the desire of the ACU to work in partnership with all sectors of Cambodian society. The CSO partnership workshop will create a positive impact in conjunction with the commencement of ACU operations.
- **National Anti-Corruption Seminar:** The purpose of the two-day seminar, to be hosted by the Prime Minister, is to demonstrate the commitment of the RGC to fight corruption and to generate political will among government agencies for anti-corruption. Ministries will receive an introduction to fighting corruption and then work to develop draft action plans for their institutions. After the seminar they will be expected to finalize the plans with technical support from the ACU and begin implementation.

The ACU expressed buy-in for these two activities, with the understanding that the National Seminar would need to include a much larger participant group that originally suggested by Mr. Kwok as various people from each ministry would need to attend to ensure that the learning in the seminar filters down to the ministries. Rather than phase in the ministerial action plans by inviting a limited group of ministries to participate the first year, as suggested by Mr. Kwok, all of Cambodia's ministries would need to be included from the start for political reasons.

Recent Events: During the writing of this report the Cambodian newspaper Kampuchea Thmey reported that the ACU will make a public announcement regarding the asset declaration process (KT 09/28/10). The article reports that since the passage of the ACL last March, the ACU has passed a series of sub-decrees establishing the structure and internal regulations of the unit, as well as management and budget processes. The ACU has also passed a format for the asset declaration, set up and developed a five year (2011-2015) strategic plan and corresponding action plan. The ACU has assigned Mr. Keo Ramy to liaise with journalists.

Activity Area 3: Work with the private sector to create a cleaner business environment and to pressure for anti-corruption reform

Initiation of the CBI: MAE initiated a coalition of private interests to tackle corruption issues in the private sector, called the Clean Business Initiative (CBI) in the second quarter of 2008. Given the growing influence of the private sector in Cambodia, MAE saw this sector as an important target group who could contribute to a cleaner business environment and lobby for business related anti-corruption reform.

The process started in the second quarter of 2007 with MAE designing an advocacy strategy in which a set of roughly a dozen clean business principles were initially suggested and presented, first to a discussion forum organized by the British Business Association (BBA) at the Cambodiana Hotel, and then to many other business leaders. There were a lot of challenges coming out of the discussions particularly with regard to what were considered to be the Clean Business Principles, in consideration of the present context of Cambodia. After a series of lengthy and intensive consultations among business leaders, coordinated by MAE for over a year, the suggested principles were finally tailored down to only four main principles before it was ready for the kick-off.

With the help of a marketing firm, a highly successful public launch was held on September 22, 2008 at the Intercontinental Hotel. Nearly 150 people participated in the launch, including dozens of business leaders and H.E. Pan Sorasak, who spoke on behalf of H.E. Dr. Cham Prasidh, Senior Minister from the Ministry of Commerce. The launch was well-covered in both print and broadcast media, including the Cambodia Daily, the Phnom Penh Post, the South East Asia Globe, Rasmei Kampuchea, Koh Santapheap, Kampuchea Thmey, Jian Hua Daily, Commercial News, CTN, TV3, TV5, TV9, and TVK. Media coverage was complimented by an advertising campaign seeking to attract new members, featured in the Cambodia Daily, Koh Santapheap, FM98, FM103, and FM105 as well as occasional radio interviews with endorsee members.

Promotion of the CBI: A multi-media campaign to promote CBI, which involved print and radio advertisements, and the launch of a Clean Business Initiative website, began in September 2008 and continued until May 2009. The campaign was targeted at businesses leaders, urging them to support clean business principles and practice, and consumers, urging them to shop in clean businesses. During the campaign, advertisements were broadcast on FM98, FM103 and FM105, and published in the Cambodia Daily and Koh Santepheap newspapers.

Members were also active in publicizing the new initiative, with CBI endorsee Mr. Soum Sambath, Executive Director of CAM-Paint Manufacturing, being interview by FM103 on the Initiative in late October 2008. While several other CBI endorsees attend and spoke about the Initiative at a Corporate Social Responsibility Conference hosted in Siem Reap on December 6, 2008.

Following the awareness raising campaign, MAE worked with Orange Brand Elements to conduct an evaluation of the campaigns effectiveness. From this it was found that 28% of micro, small and medium sized enterprises surveyed were aware of the initiative and with 32% of all people interviewed aware of the initiative.

CBI Workshops and Training: As the CBI grew in recognition, it was important for the initiative to grow in depth and effectiveness. Consequently, MAE worked with the CBI endorsees to develop training programs, hosted further educational forums and engaged with civil society.

In March 2009, MAE worked in close partnership with American Chamber of Commerce, and CBI endorsees to host a seminar on the US Foreign Corrupt Practices Act (FCPA) held at Hotel Le Royal. The seminar attracted a large audience of interested parties. The speakers included Mr. Bretton Sciaroni, Senior Partner at Sciaroni and Associates, Mr. John Musarra, former Deputy Attorney General of New

Jersey, and Mr. Peter Coleman, Executive Director of Forensic Services for Deloitte Singapore and Southeast Asia. The speakers spoke about the implications for Cambodian business under international corruption laws and offered suggestions on how they could ensure compliance. This one day event represented a groundbreaking introduction to the international implications of corruption for the private sector in Cambodia and exposed the high risks companies with corporate connection with the United States faced. Many of the attendees commented on the usefulness of the seminar and their desire to have more such events.

In conjunction with the Bar Association of the Kingdom of Cambodia (BAKC), MAE organized a second workshop on the US FCPA at the Cambodian Japanese Cooperation Center on December 28, 2009. Speakers at the half-day workshop presented an overview of the provisions of the FCPA and its applicability in Cambodia. Logistics for the event were carried out by the BAKC with the support of MAE. There were 156 attendees (122 men and 34 women) including 87 lawyers, 11 assistant lawyers, 36 lawyers' trainees, 16 BAKC staff, three guest speakers and three MAE staff. The event was also broadcast on Bayon TV and CTN. Despite the sensitive nature of the topic, the main guest speaker, Mr. Peter Coleman, Head of Forensic Services at Deloitte in Singapore, noted that participants asked insightful questions and displayed a healthy skepticism about any future anti-corruption law's implementation. MAE distributed the CBI Toolkit to attendees to provide a practical example of other ethical business practices.

On March 12, 2010, MAE delivered two Conflict of Interest trainings for CBI members. A small fee was charged to cover the cost of snacks and materials. Twenty-five people, primarily managers, representing 22 companies attended. Participants were drawn from a number of different CBI endorsee companies as well as university students. The content of the training was similar to the Conflict of Interest training for NGOs, making use of a scenario-based approach. Very few participants had any prior understanding of the concept of conflict of interest. Many believed that a conflict of interest somehow related to disputes. After the training, most participants indicated that they now understand the principles of conflict of interest and many felt that the training was very important for their businesses. On average, participants' pre-test score was 21 and post-test score was 72, reflecting a 238% increase.

On May 30, 2010, MAE invited members of the Clean Business Initiative to participate and exhibit their products and services at the Clean Hands Anti-Corruption Concert at the Olympic Stadium in Phnom Penh. ACLEAD Bank, Haga Soya, CAM-Paint Manufacturing, Morrison Kak & Associates, and Mobile Phone Magazine all participated at the event promoting clean business to many of the 50,000 attendees.

Following the success of the first FCPA seminar, MAE, CBI and the American Cambodian Chamber of Commerce decided to co-host a follow up seminar on March 16, 2010. The seminar titled "Risks v. Rewards: Ignorance is no Defense" and was a half-day seminar designed to provide the business community with examples of the FCPA's impact on non-US businesses in Cambodia and the region. In addition to opening remarks by the US Ambassador, key speakers included Mr. Tim Phillips, Global Partner, Forensic & Dispute Services, Deloitte Touche and Mr. Kenny Mok, Regional Compliance Officer, Siemens Thailand and Vietnam. A panel discussion on 'Compliance versus Corruption in Cambodia' followed the keynote speakers to provide a Cambodian context. Panelists included Billie Slott, Of

Counsel at Sciaroni & Associates, who gave an overview of the corruption offenses detailed in the draft Penal Code, and Fiona Cochaud, Deputy Head of the Australian Mission, who spoke on the Australian extraterritorial legislation as it applies in Cambodia. The post seminar evaluation was very positive with particular appreciation expressed for the two main speakers from Deloitte and Siemens. Suggestions for future seminars included discussion on activities prohibited under FCPA as well as additional interpretation of relevant laws and other cases.

CBI Publications: In mid-2009, MAE obtained permission from Forbes magazine to reprint 1,000 copies of its special edition on corruption. The special edition featured numerous articles from around the globe that were highly relevant for businesses seeking to combat corruption. The Special Report on Corruption, which originally appeared on the Forbes website on 22 January, 2009 was distributed to USAID, the American Chamber of Commerce, CBI endorsees and other interested parties.

Also in mid-2009, MAE worked closely with the CBI steering committee members to review and finalize the contents of a Clean Business Toolkit. The Toolkit was designed to be a practical guide containing best practices in five key policy areas: anti-fraud, anti-corruption, conflict of interest, whistleblower protection and customer service. In compiling and finalizing the Toolkit, many CBI endorsees provided significant input, ensuring ownership and acceptance of the toolkit amongst CBI. The CBI launched the toolkit in December 2009 at a joint workshop on Corporate Social Responsibility (CSR)/Environment and Social Governance (ESG) that MAE organized with TCE Co. Ltd, a CBI endorsee. Fifty representatives from private and non-profit sectors attended the launch. The workshop generated positive media coverage both for CBI and maintained focus on the passage of the anti-corruption law.

MAE also developed a Conflict of Interest training curriculum for CBI that was tested internally in early 2010. This curriculum used a scenario-based approach to introduce the concept of conflicts of interest, provided guidance on how to identify a conflict and provided strategies to ensure that conflicts of interest do not lead to corrupt behavior. The training and related materials was designed to be applicable for private sector audience. After MAE tested the curriculum in-house, separate sessions were arranged for CBI members for further testing. Pact delivered training to CBI members and their staff in March 2010.

Lastly, towards the end of the program MAE commissioned the “Building a Better Workplace” manual. The manual, which focused on creating an ethical workplace, was circulated to key stakeholders, such as CBI members by the CBI Steering Committee just prior to the end of the fiscal year 2010. The CBI steering committee will design an event that revolves around the manual to seek input on the manual and to encourage a lively discussion of the key topics covered in the manual.

Consolidation of CBI: Despite initial enthusiasm and energy – the CBI attracted 57 endorsees in the first six months – the CBI lost momentum after the first year. This appeared to be largely due to diverging interests within the Initiative; something not uncommon in newly established networks.

Over the last year, this growing split in the CBI appeared to be fracturing largely along the lines of international and local businesses, as it has become evident that both types of businesses have very different goals and needs. Many of the international businesses were already well equipped to counter

corruption and fraud in their own organizations and saw the initiative as positive corporate responsibility exercise, while a number of local businesses struggle to understand basic concepts and were searching for practical answers to tackle corruption issues in their organization and more generally across Cambodia.

With a view to assuring some sustainability for CBI, MAE decided to focus on where the need and energy was greatest – the local businesses. In mid-2010, MAE worked closely with local business members to form an Advisory Committee to take a lead on reforming the CBI, hosting regular meetings and assisting the Advisory Committee to conduct an on-line survey designed to explore CBI endorsees expectations, motivation, concerns and ideas for future activities. From the survey it was clear that many CBI endorsees joined the initiative to improve the business environment in Cambodia and would like to take stronger action lobbying the government for reform.

Following this, MAE assisted the Advisory Committee to develop long-term and short-term strategies for the future of the CBI. Following these meetings the members agreed to register CBI as a local not for profit organization called the Clean Business Association (CBA).

In response to this development MAE then invited the local NGO the Advocacy and Policy Institute (API) to share their experience registering their organization with the government, with CBA Board of Directors, so that they had a clear understanding of the processes involved.

Following this, the CBA's Board decided that they would need to official registration, rebrand, find office space, purchase office supplies, recruit a coordinator, establish and collect membership fees, establish a three-year strategic plan and launching various activities on its own. The Board aimed to legally register as an independent entity within three months.

Led by Mr. Key Kak, Chairman of Morison Kak et Associés and President of the Kampuchea Institute of Certified Practicing Accountant and Auditors (KICPAA), with the support of the Country Manager of Green Venture, the Executive Director of Cam-Print, and the Director of Intra, the CBA drafted by-laws and made moves towards registering the Initiative with the Ministry of Interior, with the assistance of MAE, by the end of the final quarter.

MAE also distributed monthly newsletter to keep CBI endorsees involved and informed about upcoming activities. The newsletter provided a quick introduction to CBI, an update list of the endorsees and an outline of recent and upcoming events. After review by the CBI Advisory Committee, the newsletter was sent electronically in the first week of the month to all CBI members and hard copies were also made available.

Although the CBA is new, MAE feels that the renewed energy, focus and vision of the leading members may be enough to ensure that it is successful in the long term.

By the end of the program CBI membership was at 67 organizations, representing a diverse array of sectors (banking and microfinance, manufacturing, tourism, advertising and insurance) and sizes (from businesses with just a few employees to businesses with several thousand) as well as companies that are both foreign and locally owned.

Activity Area 4: Develop resources and research that promote learning and knowledge

This section of the report outlines the activities that MAE undertook to promote greater learning of corruption related issues.

Corruption Monitor Bulletin: The Corruption Monitor Bulletin was a monthly review of corruption-related stories found in key Cambodian newspapers and radio broadcasts. The Bulletin was distributed in electronic and hard copy to a variety of stakeholders. The primary target audience for the Bulletin were Cambodia's decision-makers the members of the Royal Government of Cambodia; Ministers, members of the National Assembly, members of the Senate and commune councilors. The secondary target audience for the Bulletin was other anti-corruption stakeholders; embassies, international donors, local NGOs, international NGOs and the private sector. Each edition of the Bulletin focuses on a topical theme and contains sample stories sourced from Cambodian radio and newspapers. Each edition also provided a qualitative and quantitative assessment of the corruption related stories being published in the monitored Medias.

The Bulletin was first produced by CAIRN for MAE in December 2007 and then once a month for fourteen months until January 2009. An optimistic estimation of Corruption Monitor Bulletin readership is upwards of 1,700; which includes 1,200 copies published and distributed to the RGC and commune councils, an email soft copy distribution list of over 500 and an average of over 65 downloads per edition from the Saat Saam Website (www.saatsam.info) where a link to the Bulletin was displayed on the front page. Both a Khmer language version of the Corruption Monitor Bulletin and a combined Khmer/English languages version are produced.

From the data collected for the Bulletin it was possible to compile a survey and draw some conclusions about corruption as it appeared in the media in Cambodia during the period the Corruption Monitor Bulletin was active.

The quantitative figures showed that overall the newspapers gave enormous attention to corruption-related news. However, there were significant differences between different newspapers. Since the three largest newspapers of the country selected for the Bulletin were pro-government, and the two selected smaller newspapers – initially – were pro-opposition, one might expect that the latter pay more attention to corruption. It is therefore remarkable that Kampuchea Thmey, the third most popular newspaper in terms of circulation, brought the most corruption-related stories, followed by 'opposition' newspaper Moneaksekar Khmer.

The location of the most covered events by stories was 'Cambodia in general', indicating that stories do not report on specific expositions of corruption, but about corruption on general. This was confirmed by qualitative results on the most common keywords found in stories (corruption) and the high score for ongoing stories on exposition of corruption (48%).

Land encroachment was the most frequent covered specific topic in stories, followed by forest crime. Both issues are often related to each other. Fraud was the most common corrupt practice in these

issues and lower and high officials, police and businessmen are the ones who were usually the perpetrators. The victims were generally ordinary people (64%).

The most important source of information for stories was anonymous (38% of the stories), followed by civil society (18%) and the Government (14%). Of the other sources used 35% are unverifiable, while another 17% of the stories have no other source at all. Very few stories quote sources (22%).

The balance of reporting in the articles monitored was weak, with many (78%) printed statements/accusations not being submitted to the subject of the statement/accusation for comment. Further, only 30% of the printed ripostes of the few statements which were commented on were fair in terms of length allocated in the article.

In 16% of all stories the journalist approached the topic in a neutral and objective way. The approach in 51% of the stories was subjective and negative. Another 27% of the stories were even worse, containing accusations on behalf of the author himself or based on an anonymous source without confirmation and without response from the accused.

The results show clearly that there is plenty of attention on corruption in the five newspapers monitored, but the quality of their reports is generally poor, making the information provided less than reliable for their readers.

In terms of radio stations monitored for corruption stories, there were clear differences between AM 918 and FM 102 on the one hand, and Voice of Democracy (VOD) and Radio Free Asia (RFA) on the other. The latter two together accounted for 91% of all 2,143 stories found. The average duration of a story was four minutes. The location of events covered in stories was usually 'Cambodia as a whole' (41%). Few stories cover events outside the country (9%) of which only 3% outside the region Southeast Asia/China.

The vast majority of stories brought were news stories only (77%). Backgrounds were mostly given on VOD and RFA, each having full hour news broadcasts every day. Less than half of the stories referred to a specific single exposition of corruption. Among those that did specify the acts of corruption, land grabbing stories scored very high (25%). It was rare for both the act and the measure of corruption to be mentioned in the same story, and when both were specified it was usually related to acts of grand fraud, although the amount of money involved was never specified.

Politicians were involved in many stories but rarely as either a victim or perpetrator of corruption. In stories in which a victim could be identified it was usually ordinary people or otherwise the society as a whole who were identified. The top three perpetrators of corruption in the stories, good for 54% of all stories in which perpetrators can be identified, were lower officials (19%), businessmen (18%) and high officials (17%).

Civil society was, for more than half of all stories, the most important source of information for the stories, followed by opposition parties (13%) and Government (11%). The use of anonymous sources is remarkably low given the sensitivity of the topic; 6%. Of the other sources used 83% were verifiable for the listener. For stories with unverifiable sources it is interesting to see that RFA, being the only western

originated station monitored, broadcast most of them. The tone of quoted sources is mostly negative (49%), though surprisingly few quoted sources express accusations (12%).

Statements and accusations were mostly proposed to the subject of the statement and/or confirmed by other sources in the stories. The airtime given for ripostes was 38% of the time fair compared with the statement/accusation the subject responded to. The approach towards the subject by the journalist program was mostly neutral and objective (49%). Although 47% of all stories took a negative and subjective approach to the stories.

If Cambodians listen to the radio for information about corruption, the information is mostly brought neutrally to them, but rarely reveals facts about specific cases which could support them in the national fight against corruption.

With media monitoring findings covering 6,009 newspaper stories and 2,143 radio items on corruption it can be concluded that while both press and radio reporters would benefit from proper journalism training and ethics, it is equally important for Cambodia to create a society in which qualified reporters can practice their profession without fear.

From an internal evaluation of the Corruption Monitor Bulletin conducted in January 2009, MAE found that although the target groups appreciated the Monitor, it was lacking in broad appeal and effectiveness; there was nothing to suggest that it was resulting in greater debates on the topic of corruption or leading to the adoption of more effective corruption reform. Consequently, MAE decided to invest in a radio show which could reach a broader audience in a more easily digestible format.

Radio Talk Show: The works on a Radio Talk Show featuring Corruption Monitor started in April 2009 when USAID decided not to continue with the Corruption Monitor Bulletin and DANIDA expressed interested in filling the void. The radio-show was planned to start in June 2009, upon the signing of the Project Document with DANIDA in May. However, due to a delay in the start of the World Bank-funded national project, Demand for Good Governance (DFGG) to which the Radio Talk Show project was linked, it did not start until August 30, 2009.

Prior to the start of the Radio Talk Show MAE entered a lengthy negotiation process to secured a Memorandum of Understanding with Radio National Kampuchea (RNK) for the production and broadcasting of the Corruption Monitor Radio program, a weekly talk-back radio program that focused on good governance and anti-corruption for 18 months with the first show being broadcast on September 7, 2009. By the end of financial year 2009 three episodes of the show had been broadcast featuring guest speakers from the government and civil society. The radio show effectively replaced the Corruption Monitor Bulletin, which had a limited audience. Through the medium of radio, MAE believed it could reach a far larger audience and stimulate more fluid interactions between the government and civil society in a public setting.

Monitoring of newspapers: Following the discontinuation of the Corruption Monitor Bulletin, MAE management decided to continue media monitoring efforts internally with a view to providing better stories for the Corruption Monitor Radio Show and to continue to track the number of stories being published over time.

From September 2009 until September 2010, MAE monitored corruption related stories in both Khmer and English language print media in Cambodia. In total 3,951 stories related to corruption were published by the nine different newspapers: Reaksmei Kampuchea, Kampuchea Thmei, Koh Santepheap, Deum Ampil, Norkorwat, Khmer Machas Sroke and Moneseka Khmer, the Cambodia Daily and the Phnom Penh Post. In the last quarter of the program (July - September, 2010), more articles were published (1,290 articles) than in any previous quarter monitored, almost double the number published in the first quarter (October-December, 2009). A high number of articles published were related to the Anti-Corruption Law and Anti-corruption Unit, indicating the effect that these have had on generating stories and, in some ways, further opening up the public dialogue on corruption issues. This increase in the number of stories also indicates that journalists are comfortable with publishing anti-corruption stories following the passage of the anti-corruption law and the growing will of government officials to tackle corruption.



Additionally, during this period there were 110 articles published by ACCAP trained journalist.

Saat Saam Website: The Saat Saam website (www.saatsaam.info) was managed by Open Forum of Cambodia with support from MAE to serve as a porthole for ready source of information on corruption, good governance and freedom of information. The website was designed as a means of reaching out to urban youth, who are amongst the biggest consumers of internet services in Cambodia, and went online in April 2008. There were two versions of the website; one in Khmer language and the other in English language. The website also featured a blog, which promoted open and balanced discussions of corruption issues. The site included features such as recent anti-corruption news, research papers, reports and statistics.

In September 2009, MAE conducted an internal evaluation of the Saat Saam website exploring whether the website was effective and was reaching the target audience.

In order to understand if the website was effective a review of the website's the metrics was conducted. This found that the Saat Saam website had had 33,589 visitors to the Khmer language site and 7,495

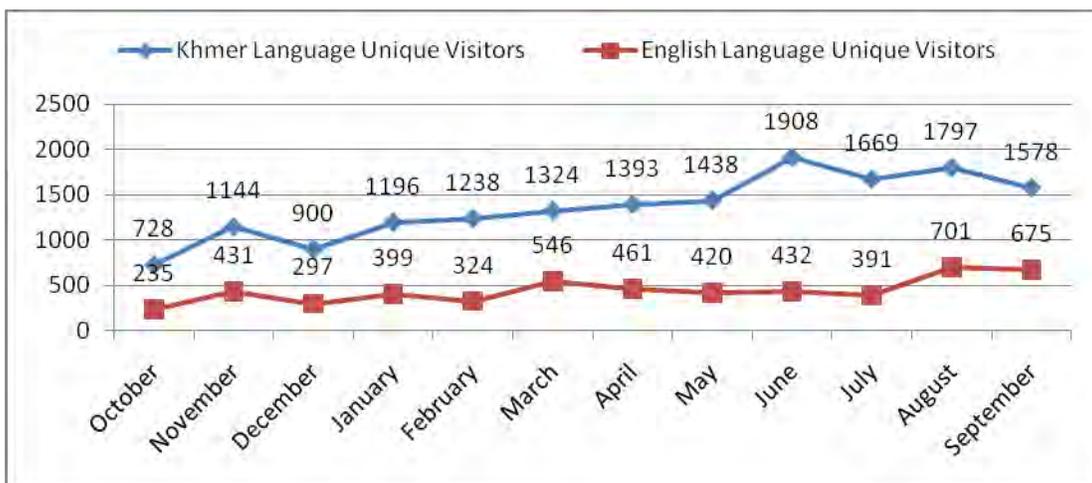
visitors to the English language site, totaling 41,089 visitors. Of these visitors, 17,872 (or about half) were unique visitors to the website, indicating that half of the visitors to the site were return visitors. There had been a steady increase in number of visits to the website, especially the Khmer language website, over the 2009 financial year, while unique visitors appear to have leveled off the preceding three months, which indicated that there is a greater number of return visitors to the website, with a greater number of page view.

Thus from this data it can be said that the website was being accepted by internet users as a place to go for information, rather than a site that is looked at as a 'once-off' and it could be concluded that the Website was achieving its objective of being a repository or library of information on corruption issues. It also shows clear intent by the users in accessing the website for information, rather than hitting the website by accident.

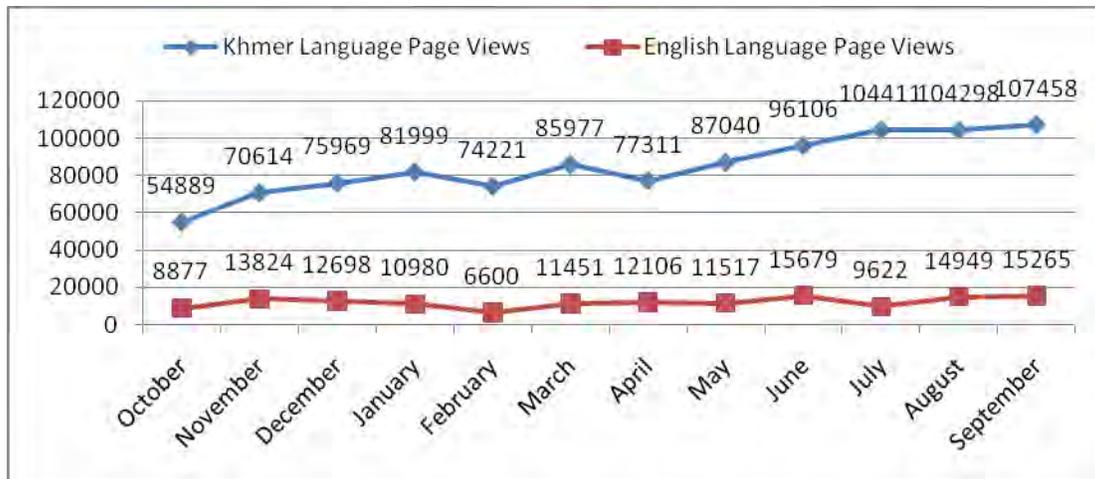
Number of visitors to Saat Saam website



Number of Unique Visitors to Saat Saam website



Number of Saat Saam page views



From a review of the websites metrics it was also possible to note the top ten most viewed pages for the website were:

1. Citizen perceptions of the establishment of an anti-corruption law
2. Citizen perceptions of anti-corruption issues
3. The million signature campaign advocates to the National Assembly to pass an anti-corruption law
4. Corruption eradication is the need of the citizens
5. The million signature campaign will force the assembly to pass the anti-corruption law
6. A vendor (woman) supports the anti-corruption campaign by offered her finger print
7. Citizens learned about corruption issues
8. Corruption affects motor taxi and tuk tuk drivers
9. Corruption affects Im Neang's family
10. Respecting and following the Traffic Law is participating in anti-corruption efforts

Although interesting, it is difficult to draw any conclusions about this.

In addition to reviewing the websites metrics, MAE decided to conduct a survey of internet users in Phnom Penh, to understand if the website was reaching the desired audience. To assist with the survey MAE contract Orange Brand Elements to conduct a survey of internet users in Cambodia – using a random selection of people coming out of internet cafes in Phnom Penh.

From this survey it was found that while website was useful and effective when it was accessed, only a small percentage of people were using the internet for news (26%) or research (18%), and even less (6%) had ever accessed the Saat Saam website. Further the frequency of internet usage was fairly low, with

most people using the internet only a few times a week or less and few (6%) seeing the internet as the most trustworthy source of information on corruption issues.

That said, there was a strong interest in corruption issues by internet users and they were more aware of corruption issues than the average citizen. It is possible that this interest, with the right marketing, could have been capitalized on to promote greater use of the Saat Saam website. The great advantage of the Saat Saam website was that access is largely anonymous, people risk little in seeking it out and reading its contents, and the website itself is non-offensive, it does not seek to push a political agenda, but simply houses useful anti-corruption material. Further, it was a fairly cheap activity, especially in comparison to the Corruption Monitor Bulletin and Radio Show.

Despite this, USAID and MAE decided to cease supporting at the end of 2009.

For about six months after funding from MAE ceased Open Forum maintained the website independently at a lower level of activity. The website is still accessible and the blog was still active at the time of writing this report. In total over unique 27,500 visitors had been to the website since it became active, with about a third of these visiting the website after funding by MAE had stopped indicating that it is self-sustainable for the time being. But without new content, this is likely to drop away.

Publications: Throughout its existence MAE has published numerous documents and reports dealing with corruption in Cambodia, with a view to providing resources and information to those interested in countering corruption or learning more about corruption in Cambodia. These have included the following publications:

- **Existing Mechanisms for Addressing Corruption:** A report listing existing mechanisms in Cambodia which citizens can use to address corruption. The report states both formal mechanisms – national regulations and laws, administrative structures of the government – and informal mechanisms such as using individual and collective responses to corruption. *Published in January 2007.*
- **Perceiving and Fighting Corruption in Cambodia:** An analysis of the perceptions of corruption by the Cambodian population. The report explores issues which include the understanding of corruption by the population, the standards Cambodians expect from public services, the social acceptability of talking about corruption issues, and what people feel should be done to fight corruption. This study can be used as a good foundation to explore anti-corruption strategies that have to be used to be effective in the Cambodian context. *Published in February 2007.*
- **Oil and Gas in Cambodia:** A study looking at some of the issues that may arise from the future production of oil and gas in Cambodia. The report is designed to help civil society play a role in these issues, by exploring what actions they can take, and discussing the skills, information and support they may need to conduct effective activities. *Published in February 2007.*
- **Freedom of Information (FOI) brochure:** A brochure which provides easy and simple information about the rights that Cambodian citizens are guaranteed by the Cambodian

Constitution and other international instruments with regards to access to public information. It explains the importance and benefits of freedom of information for Cambodians. It also insists on the need for a freedom of information law, and what should be included in such a law. *Published in March 2008.*

- **Corruption in Cambodia briefing note:** A briefing note providing an overview about the nature of corruption in Cambodia and showing that it is present in all sectors of the society. It recalls that only slow progress could be made because laws on anti-corruption and freedom of information had not yet been passed at the time of the publication. *Published in 2009.*
- **Building a Better Workplace.** An anti-corruption manual providing employees and employers information on how to transform their workplace into a more transparent and ethical space. It explains how to avoid conflict of interest inside the workplace and create a working environment based on rules and ethics. *Published in June 2010.*
- **Building Stronger Communities.** An anti-corruption manual for Cambodian Civil Society Organizations (CSOs) that can be used to help CSOs educate people in procurement systems, and monitoring the integrity and transparency of public services at the local level. *Published in September 2010.*

Household Corruption Survey: In the final stages of the program, MAE undertook a Cambodian Household Corruption Survey. The objective of this survey was to produce a nationally representative picture of Cambodian's perceptions and attitudes towards corrupt practices, and to document and analyze the actual cost and impact of corrupt practices for Cambodian households. The point of departure for survey design and implementation was the 2005 study "Corruption and Cambodian Households: Household Survey on Perceptions, Attitudes and Impact of Everyday forms of Corrupt Practices in Cambodia" published by Centre for Social Development. From this survey MAE also sought to establish the impact of the program.

To assist with the survey MAE contracted local company Marketing Strategy and Development (MSD), to conduct the field work and data entry, and the Confederation of Danish Industries (DI) to develop the questionnaire, train the enumerators, analyze the data and produce the final report. During the survey field work MAE monitored the enumerators from MSD as they collected, entered and cleaned data from the 21 sample provinces and over 2,000 respondents, and worked with the DI to finalize the questionnaire, analyze the data and draft the final report. In the second last week of September, Ms. Christine Joker Lohmann, author of the 2005 CSD report and DI employee came out to Cambodia to discuss the results and refine the final report with MAE, the Anti-Corruption Donor Working Group and the ACU. The final report was submitted to MAE at the end of the quarter, and will be disseminated further with the assistance of DANIDA after the completion of MAE.

The findings from the survey showed positive signs in the fight against corruption in Cambodia. Perceptions of public services and perceptions of different agencies and institutions in Cambodia have improved considerably since the 2005 survey. Additionally the amount paid in bribes by households has declined since 2005. Many Cambodians now cite corruption as a major problem for the country, second

only to the cost of living. Poor people living in rural areas pay a relatively higher percentage of their income in corruption compared with middle income and high income people. But people living in urban areas pay more in total. Women pay bribes more often than men, but are not asked to pay more than men. Female civil servants are also thought to be less corrupt than their male counterparts.

However, it is also clear that corruption continues to be widespread and systematic. Many people know how much they will need to pay before they acquire service. Many people also note that paying a bribe will improve service delivery. Despite high levels of corruption in the educational system, people still have a great deal of trust in these institutions, indicating that people are giving this money with sincerity. This was a common finding from the survey, people seemed to still trust local institutes even though they were paying bribes to them, but were more suspicious of national institutions where they did not have direct contact.

It is anticipated that the results of the survey will be of great interest to many in the government and non-government sectors working in Cambodia, especially the ACU. Consequently, MAE believe that the dissemination process will be an important learning experience and should not be rushed. For these reasons MAE sort support from DANIDA to implement a comprehensive dissemination strategy, rather than rushing these activities through at the end of the program.

Activity Area 5: Work with donors to maintain pressure on the Government to adopt appropriate reform

Collaborating with other USAID partners: Throughout the program collaborated with other USAID partners, such as DAI and EWMI, to promote the Clean Hand Campaign and to mainstream anti-corruption into other projects. However, adoption of anti-corruption reform largely depended on the political will of different organizations.

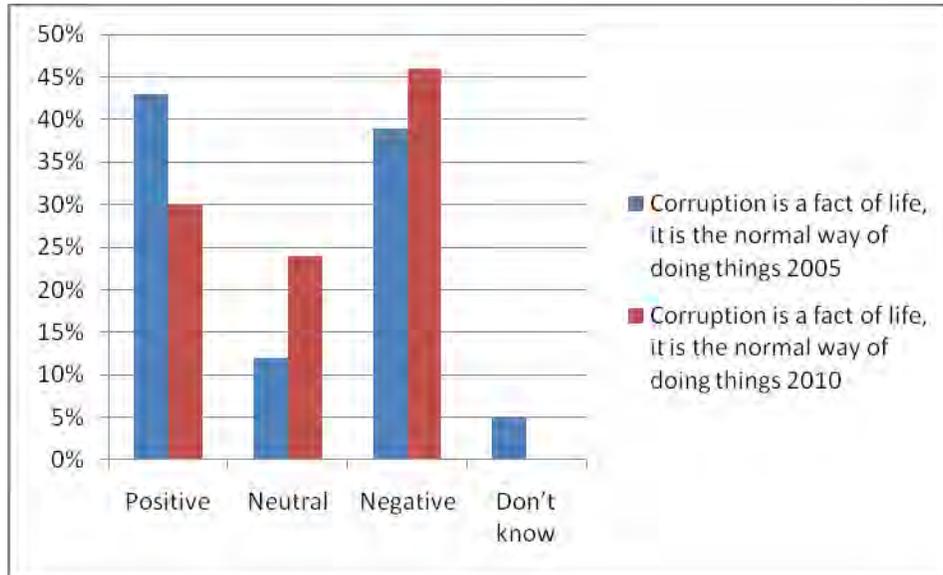
Anti-Corruption Informal Donor Working Group: MAE served as a technical advisor to the Anti-Corruption Informal Donor Working Group throughout its four year life span. The group aimed to meet every 4 to 6 weeks to address issues of mutual concern, especially regarding the development of the anti-corruption legislation. But in reality the group met far less frequently, due to rival business and, often, a lack of will. Despite this the Anti-Corruption Informal Donor Working Group developed a joint statement for Government-Donor Cooperation Committee (GDCC) and MAE provided regular updates to the group on progress of the anti-corruption and freedom of information reforms. Membership in this group includes, USAID, UNDP, World Bank, ADB, EU, DANIDA, JICA, and others.

5.7 Project Outcomes and Impact

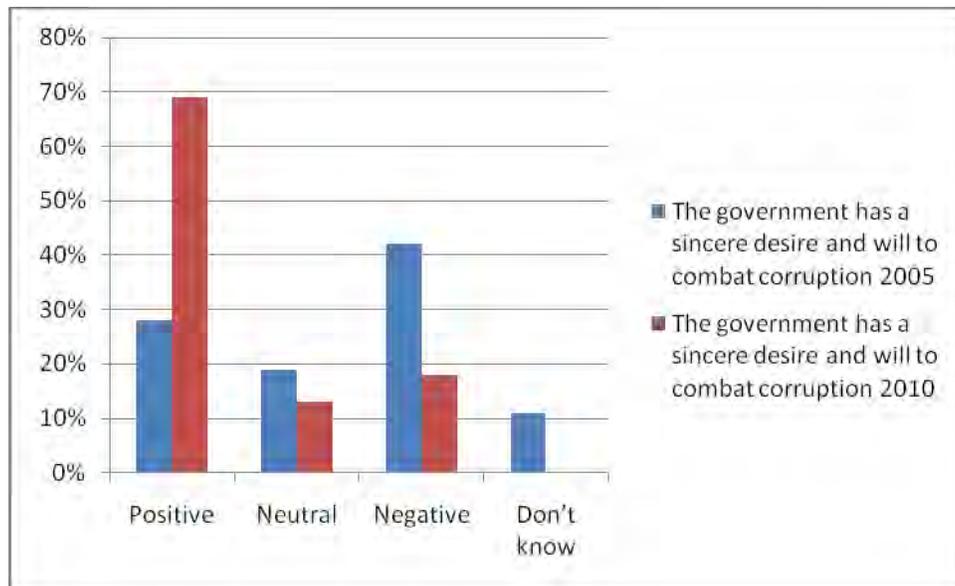
While there were many factors involved, the fact is, is that after 15 years of delays and rhetoric, the Royal Government of Cambodia passed an Anti-Corruption Law and established an Ant-Corruption Unit while the MAE program was active. Moreover, the passage of the ACL occurred after two high profile public events – the Million Signature Campaign and the Clean Hand Concert – orchestrated by MAE to put pressure on the Government to pass this law. During this period MAE was the only program pushing for such reform in Cambodia. Thus while MAE cannot attribute all of this success to its own efforts, these outcomes and the timing are hard to ignore.

Additionally, from the Household Corruption Survey, it is also clear that Cambodians are more concerned about corruption than before, are more aware of corruption issues, are paying less in bribes and have greater trust in public authorities. Specifically Cambodian's now:

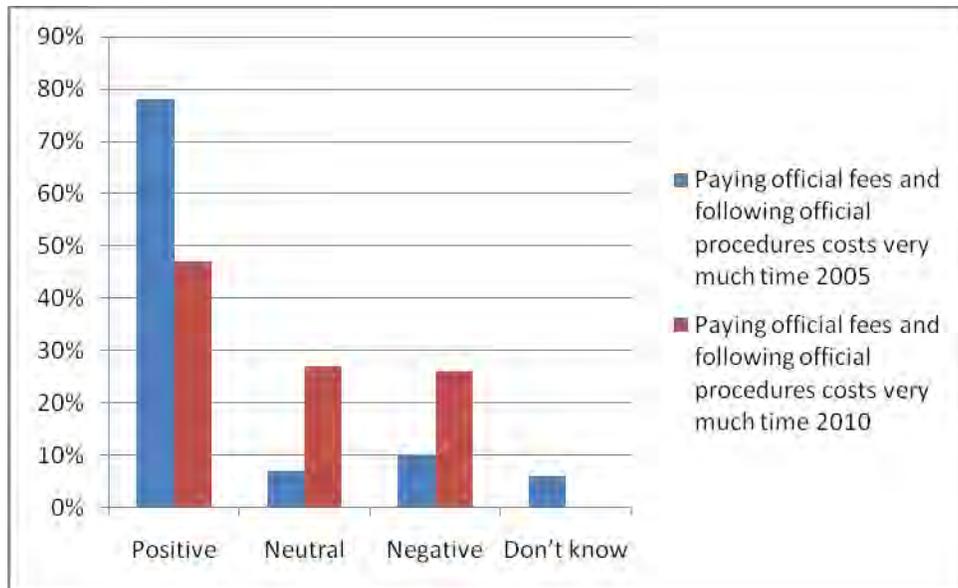
- Are less accepting that corruption is a fact of life;



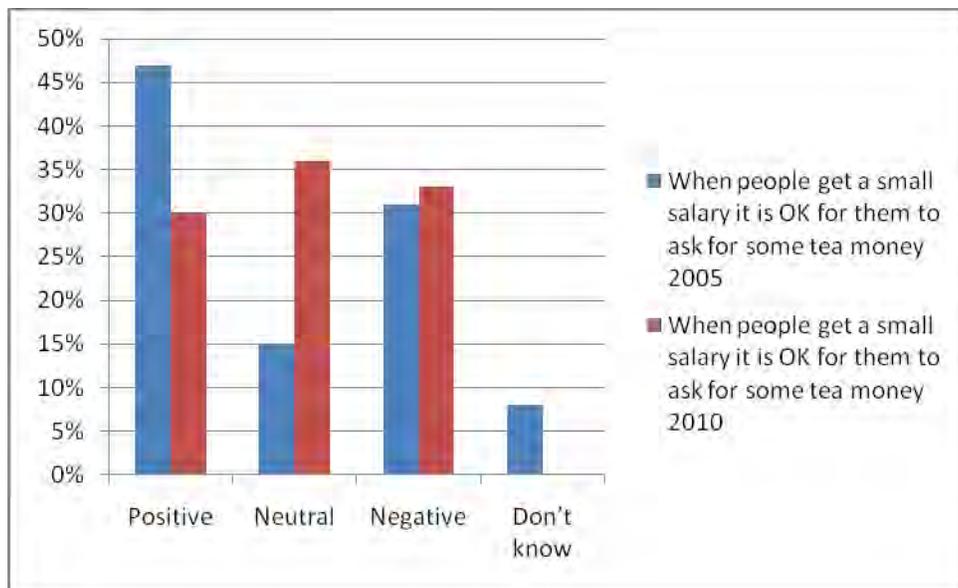
- More likely to believe the Government is genuine in their attempts to reduce corruption;



- Are more likely to believe conducting business through the official channels is less of a burden than before; and,



- Are less likely to think that receiving a low salary is an excuse to take a bribe.



Taken together these are very positive outcome for Cambodia and the MAE program. Clearly people are more aware and engaged in the fight against corruption than before the MAE program. That said, Cambodia still has a long way to go; the ACU is in its infancy, civil society is not as strong as it could be and the private sector is still finding its feet.

5.8 Project Sustainability

While the promulgation of the Anti-Corruption Law on April 17, 2010, was important step forward for Cambodia, much work needs to be done to ensure its effective enforcement. The work that MAE did with the ACU was a good start, but needs to be built and capitalized on to ensure that it is effective.

In terms the civil society mechanisms established by MAE – CISA, the CRRT and the FOI working Group – there is a mixed bag. It seems highly likely that now the CISA is independent, staffed and has its own funding sources that it will be sustainable in the short term, and will be able to continue to push for reform and implement projects. But, it is unclear if CISA will be able to endure any splits in the coalition or short falls in funding. The CRRT on the other hand, seems to have a strong focus, management and potential funders; it seems the most likely of the three mechanisms to be sustainable for a long time into the future. Lastly, the FOI working group is struggling to attract attention and funding. While it has plodded along throughout the project, it will struggle unless it can secure funds to continue its work.

Despite the many setbacks, the current leadership of the CBA is motivated, focused and dedicated. It seems likely that it will be able to continue into the future.

Even if these mechanisms fail, it seems likely now that enough people are aware of corruption and concerned enough to do something about it. This in large part can be attributed to the MAE and ACCAP awareness campaigns which reached millions of people. To roll back on reform now would result in major discontent with the ruling party.

5.9 Lessons Learned

There are a number of lessons that can be drawn from MAE’s experiences in Cambodia for both other anti-corruption efforts and advocacy efforts in general:

- 5 A memorandum of understanding with the Government, such as the one LAAR negotiated with MOI, would have made working with the Government much easier. It would have given MAE a focal point to work with prior to the establishment of the ACU, and would have provided greater insight into the Government’s thinking. Without this agreement MAE could not influence the Government from within, and was forced to work more with civil society and the private sector, which had limitations, not the least of which was their capacity to understand and take action on corruption issues. It should also be remembered that the ruling party is not a single minded body. There are reforms and leaders within the party that see the benefits of anti-corruption efforts and with the right support are willing to speak out about them. The challenge remains in identifying and helping those elements to do so.
- 6 It would have better to have just focused on local business with the CBI from the start. Clearly international and local businesses are going to have different goals, capacities and priorities. It may have been worthwhile undertaking a two or three pronged approach to dealing with the private sector in Cambodia and specifically targeting different business types with these approaches.
- 7 It has been difficult to raise the capacity of civil society to engage with the Government on corruption, as many NGOs are donor driven; something that is not missed by the Government in their criticisms of the Cambodian NGO sector. While this remains the case it is difficult to push issues without direct funding support and technical assistance.

- 8 A consistent leadership and vision is paramount for a program's success. In many ways MAE has been fortunate in achieving what it has.
- 9 Radio and television are far better mediums for reaching a large audience and influencing change. The internet remains in its infancy and many people, including Government officials, are still reluctant to read reports or bulletins.
- 10 Despite the political fallout, big events with Cambodian people do attract the attention of the Government and appear to result in positive action. Future advocacy campaigns should note this, but be careful to balance such events with support to implement change, and not to push relationships too far. It would also be useful to incorporate the Government, where possible, in the organizing and execution of such events.

10.10 Recommendations

The passage of the new Anti Corruption Law and the establishment of the new ACU create a golden opportunity to change the public cynicism and to engender public confidence and support. It is also a golden opportunity to demonstrate political will and to build up a nationwide coalition against corruption.

At the same time public expectations will be raised for immediate and notable impact in the fight against corruption. If there is a lack of initial success or impact, the public will quickly become disillusioned and cynical and it will be extremely difficult to win back their support. Without the public support, it is impossible for any country to succeed in combating corruption. Hence the top government, the politicians, the ministries, ACU, the regulatory agencies, NGOs and the donor agencies should make a concerted effort to come up with a series of action to produce a great impact upon the commencement of the ACU operation scheduled for December 1, 2010.

On the flip side, the absence of an FOI law will be an ongoing issue in the future. Pressure should be maintained on the Government to pass appropriate legislation and to continue to build civil society, especially the FOI Working Group, to keep up this work.

6. Appendices

Appendices 1: SGA Element Indicators

Indicator No.	Indicator
2.1.1.a	Number of USG-supported public sessions held regarding proposed changes to the country's legal framework
2.1.1.b	Number of campaigns supported by USG to foster public awareness and respect for rule of law
2.2.1.a	Number of national legislators and national legislative staff attending USG sponsored training or educational events
2.2.1.b	Number of civil society organizations receiving USG assisted training in advocacy
2.2.1.c	Number of public forums resulting from USG assistance in which national legislators and members of the public interact
2.2.1.d	Number of USG assisted civil society organizations that participate in legislative proceedings and/or engage in advocacy with national legislature and its committees
2.2.3.a	Number of sub-national government entities receiving USG assistance to improve their performance
2.2.3.b	Number of local mechanisms supported with USG assistance for citizens to engage their sub-national government
2.2.3.c	Number of individuals who received USG-assisted training, including management skills and fiscal management, to strengthen local government and/or decentralization
2.2.4.a	Number of government officials receiving USG-supported anti-corruption training
2.2.4.b	Number of people affiliated with non-governmental organizations receiving USG supported anti-corruption training
2.2.4.c	Number of mechanisms for external oversight of public resource use supported by USG assistance
2.2.4.d	Number of USG-supported anti-corruption measures implemented
2.4.1.a	Number of civil society organizations using USG assistance to promote civic participation
2.4.1.b	Number of civil society organizations using USG assistance to improve internal organizational capacity
2.4.1.c	Number of participants in USG-funded programs supporting participation and inclusion of traditionally marginalized ethnic minority and/or religious minority groups
2.4.1.d	Number of USG assisted civil society organizations that engage in advocacy and watchdog functions
2.4.1.f	Number of CSO advocacy campaigns supported by USG
2.4.1.i	Number of non-USG spokespersons that promote tangible anti-corruption actions through reasoned dialog and debate with USG assistance
2.4.2.a	Number of journalists trained with USG assistance

Appendices 2: LAAR Management Indicators

Indicator No.	Indicators
2.2.3.d	Annual Citizen Satisfaction survey score
2.2.3.e	Average number of citizens attending monthly CC meetings*
2.2.3.f	Average number of citizens who actively participate at regular CC meetings*
2.2.3.g	Number of CCs conducting Commune Action and Effectiveness Process (CAEP) on an annual basis*
2.2.3.h	Number of CCs implementing Commune Improvement Plans (CIP) based on annual CAEP*
2.4.1.e	Average number of individuals attending regular CC meetings

*Indicators changed in November 2009

Appendices 3: MAE Management Indicators

Indicator No.	Indicators
2.2.4.e	Number of anti-corruption legal or regulatory reforms adopted (including but not limited to ACL, FOI, EITI, etc.)
2.4.1.h	Number of companies attending USG sponsored events to increase private sector integrity*
2.4.1.g	Number of private sector firms actively supporting "Clean Business" campaign as demonstrated through signing of Clean Business treaties
2.4.2.c	Number of investigatory articles published on anti-corruption topics by MAE-trained journalists*
2.4.2.d	Total Number of articles on corruption published in Cambodia by leading media outlets*

*Indicators changed in November 2009

Appendices 4: Former SGA Management Indicators (changed in November 2009)

Indicator	Indicators
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No.	
2.2.3.e	Percentage of LAAR partner communes in which citizen attendance at regular CC monthly meetings increases by 5% or more
2.2.3.f	Percentage of LAAR partner communes in which active participation by women in regular CC monthly meetings increases by 5% or more
2.2.3.g	Number of CCs conducting Commune Council Performance Assessment (CCPA) on an annual basis
2.2.3.h	Number of CCs implementing Commune Improvement Plans (CIP) based on annual CCPA
2.4.1.h	Number of companies adhering to Clean Business principles
2.4.2.d	Total Number of articles on corruption published in Cambodia

Appendix 5: Sub-Grant Report

See attached