



**សម្មាគ្រាពិភពលោក**  
TRANSPARENCY INTERNATIONAL CAMBODIA

## **PROGRAM PROPOSAL 2012-2015**

**Together Against Corruption (TAC)**  
*Strengthening demand and participation  
from society, public and private sectors to  
fight corruption*

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## 1. INTRODUCTION

### 1.1 Transparency International (TI)

TI is the global civil society organization leading the fight against corruption. It brings people together in a powerful worldwide coalition to end the devastating impact of corruption on men, women, and children around the world. TI's mission is to create change towards a world free of corruption. TI challenges the inevitability of corruption, and offers tools to fight against it. Since its founding in 1993, TI has played a leading role in the fight against corruption around the world by building momentum for the anti-corruption movement. TI raises awareness and diminishes apathy and tolerance of corruption. Moreover, the organization devises and implements practical tools and actions to address it.

TI is a global network including more than 90 locally established national chapters, chapters-in-information and national contacts. These bodies fight corruption in the national arena in a number of ways. They bring together powerful coalitions and relevant players from government, civil society, business and the media to promote transparency and accountability in various areas such as public administration, procurement, and business. TI's global network of chapters and contacts also use advocacy campaigns to support and lobby governments to implement anti-corruption reforms.

Politically non-partisan, TI does not undertake investigations of alleged corruption or expose individual cases, but at times will work in coalition with organizations that do so.

The strong points of TI originate from the combined strengths of more than 90 TI national chapters plus an international secretariat which together bring:

- ✓ Expertise and tools, especially several indexes, developed to measure and address corruption in various contexts;
- ✓ “Constructive criticism” approach that makes TI a valued and trusted partner by Governments, international organizations, business, media and society around the world;
- ✓ Independence and non-political partisanship;
- ✓ Capacity to mobilize and build coalitions of stakeholders;
- ✓ Wide-ranging knowledge acquired through worldwide research and advocacy work undertaken at regional, national and local levels;
- ✓ Recognized international experience and networks of experts on corruption in numerous sectors;

## 1.2 TI Cambodia

Realizing the need to strengthen and expand global cooperation and solidarity between and among all stakeholders in order to achieve the Millennium Development Goals (MDGs) and to advance the broader development agenda, TI has provided support for the establishment of the National Chapter in Cambodia (TI Cambodia). This expands its scope of work into Cambodia where corruption has pervaded almost every sector of public life, with a system of patronage well entrenched in society.

TI Cambodia was officially founded on July 5, 2010 by a group of volunteer Cambodian professionals who come from international and local organizations. They brought diverse and extensive experience and expertise in development, capacity building, and financial management, as well as governance and anti-corruption.

The mission of TI Cambodia is to work together with individuals and institutions at all levels to promote integrity and reduce corruption in Cambodia through the following areas:

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

Since its inception, TI Cambodia has coordinated two major events including the TI Cambodia-Korea Joint Symposium on “Fighting Corruption to Achieve Development”, and the TI-Cambodia Consultation Workshop to develop a three-year strategic plan. The events were very well attended by the relevant stakeholders including donors such as: USAID, EWMI, TAF, World Bank, DANIDA, and PACT, along with many civil society organizations, media as well as the Government’s Anti Corruption Unit represented by the Chairman, H.E Senior Minister Orm Yentieng.

It is clear from the outset that the establishment of TI Cambodia is a very welcome move especially at the moment when the enabling environment in Cambodia has noticeably improved. TI Cambodia is building upon the momentum and interest from concerned institutions and prominent individuals who have been actively involved in the fight against corruption. The organization is led by experienced, qualified and committed individuals who have been voluntarily working hard to

establish necessary organizational infrastructure and institutional framework, to officially establish TI Cambodia as a strong and professional organization to fight corruption in Cambodia.

With financial support from EWTMI-PRAJ, two founders of TI Cambodia participated in the TI Regional Governance and Annual Membership Meetings as well as the 14<sup>th</sup> International Anti-Corruption Conference (IACC) held in Bangkok in November 2010. This provided great opportunity for TI Cambodia's founders who are now leading the organization to deepen the knowledge about corruption issues while building network within and among anti-corruption advocates and practitioners from all over the world.

In addition, one of the founders who is leading and coordinating TI Cambodia's development effort also went on a two-day visit to Toward Transparency (TT), the TI National Contact in Vietnam in December 2010. He studied the process of developing the strategic plan of TT, learned lessons and experience for a successful fund raising strategy as well as the challenges that the organization faced during its' early stage. TT became a National Contact of TI in 2009 and raised approximately US\$2 million for its three and half year program strategy which is currently ongoing.

To support the initial establishment of TI Cambodia, TI-Secretariat in Berlin, Germany, provided seed funding of 10,000 Euro for a period of eight months from October 2010 to May 2011. This short-term funding has been used to strengthen the strategic area of governance and accountability and the operations infrastructure. The funding has covered costs for a consultation workshop to develop the strategic plan, board meetings, communications, office rental, computers, printers, office furniture and stationary as well as to pay for a full-time Administrative and Financial Officer during the second half of the funding period.

The Board of Directors for TI Cambodia has been officially formed comprising of prominent individuals from local and international organizations and private sectors to ensure the proper governance, management and leadership of the organizations. Please see biography of the Board members in the Annex. A few board meetings were held over the past few months to review and approve internal governance and legal framework for the organization while regular communications are taking place to improve the three year strategic plan aiming to present to potential donors in April 11, 2011.

TI Cambodia's by-laws have been approved by the board on January 19, 2011. The Financial Management Manual/Policy and the Employee Manual/Policy have been developed. All these documents were finalized and approved by the Board by June 2011, enabling TI Cambodia to implement this strategic plan when sufficient funding is secured.

## 2. ABOUT THIS PROPOSAL

As a National Contact of TI, a leading civil society anti-corruption movement, TI Cambodia looks at the three and half year strategy from a realistic point of view and focuses on the most urgent and relevant issues of corruption that need to be addressed in Cambodia. As founders and leaders of the organization, we believe that we are in a better position to perform these roles because of the following reasons:

First, we believe our institutional structure follows best practice and international standards that ensures accountable and transparent management systems, which TI Cambodia has the mandate to develop and maintain. Second, the diversity of personal and professional backgrounds of committed individuals we have been gathering to get involved in our work will ensure a sustained commitment and passion to fight corruption in an expandable scale over a long period of time into the future. Third, we hold it as essential that TI Cambodia maintains its neutral approach and will focus on building coalitions and creating constructive engagement as a fundamental strategy of our overall program implementation and operations.

Finally, we know that our cause to fight corruption is vital, thus we will be given necessary support to achieve our mission and goal for the next three and half years, and beyond.

This strategy was developed based on the inputs and contributions from many stakeholders including donors, civil society organizations, media, youth and student groups as well as the Cambodian Government's Anti-Corruption Unit. These actors were consulted through an interactive workshop. A series of interviews with prominent civil society leaders who have significant experience working in governance and anti-corruption areas were also undertaken.

Our consultation workshops and conversations with prominent individuals were held to assess the success of the country's anti-corruption strategies and governance challenge from a strategic perspective; to identify and discuss priority policy issues on social, economic, political and

environment developments in the country; to select the overall goals that TI Cambodia must reach to accomplish its mission; to determine specific approaches that TI Cambodia must take to reach each goal; and, to identify specific action plans for each approach to be implemented effectively and efficiently.

A donor consultation meeting was held on April 11, 2011, to present the draft Strategic Plan and to solicit feedback and comments for the purpose of making the TI Cambodia Strategic Plan more inclusive and relevant to the Cambodian contexts and the donors' vision.

Work on the three and half year strategic plan was led by the Executive Director and the founders of TI Cambodia, guided by the TI Regional Coordinator for East Asia and other members of the team based in TI-Secretariat in Berlin, Germany. The Board of TI Cambodia has been involved to review and provide inputs and endorsement to the Strategic Plan.

Since we develop this strategy for three and half years, it is inevitable that we will need to revise it from time to time to make the program focus suitable and relevant to the Cambodian situation and corruption priorities as situations on the ground evolve. Thus, we will continue to consult with stakeholders, opinion leaders and all concerned institutions to adopt our strategy.

In addition, we seek to conduct the National Integrity Systems Assessment (NISA) in Cambodia in 2011 and will use the results and findings to further enhance the strategic plan for the remaining period.

### **3. COUNTRY ANTI-CORRUPTION CONTEXT**

Cambodians have witnessed enormous changes in their country since the 1991 Paris Peace Accord which brought about the beginning of the end to more than two decades of war, the arrival of the free market economy, and the promise of democracy. While Cambodians are at long last enjoying political stability and the absence of armed conflict, the establishment of democratic institutions and the desired governance system remains weak and fragile.

After two decades of civil war and political violence, corruption has pervaded almost every sector of public life, with a system of patronage well-entrenched in society. Among the other major factors, pervasive corruption within the judiciary hindered its ability to provide effective oversight of the government or recourse to victims.

The Cambodian Government has gained remarkable success in improving the country’s economy over the last 10 years. Despite this, the achievement in improving governance and accountability, especially in the fight against corruption, has been perceived as disappointing by the international community and development partners.

According to the TI Global Corruption Barometer 2010, 43% of Cambodian people believed that corruption has increased over the past three years, 27% thought it had stayed the same and 30% said it had decreased. According to the same source, the judiciary is viewed to be the most corrupt institution followed by the police, public officials/civil servants, political parties, education system, parliament, business/private sector, media, military, NGOs and religious bodies.

### **Most Recent Corruption Perceptions Index (CPI) for Cambodia (2009 – 2011)**

The CPI ranks countries on a scale from 10 (highly clean) to 0 (highly corrupt).

	<b>Score</b>	<b>Rank</b>	<b>Key Message:</b>
<b>2009</b>	<b>2.0</b>	<b>158</b>	<ul style="list-style-type: none"> <li>• Corruption is pervasive in almost every sector of public life.</li> <li>• In the past year, Cambodia has implemented significant changes including the passing of the long-awaited corruption law and creation of the Anti-Corruption Council. The law, however, has raised criticism from various actors. Since the CPI measures perceptions of corruption from January 2009 until September 2010, it is too early for such changes to affect the CPI.</li> <li>• There must also be political will for the enforcement of the new law to be effective.</li> <li>• Moreover, the independence of the Anti-Corruption Council remains to be seen.</li> </ul>
<b>2010</b>	<b>2.1</b>	<b>154</b>	
<b>2011</b>	<b>2.1</b>	<b>162</b>	

*Source: Corruption Perceptions Index (CPI) of Transparency International 2009 – 2011*

The year of 2010 brought new hope for Cambodians, with the approval of the Anti-Corruption Law and the establishment of Councils to work on the fight against corruption. More work however, needs to be done to ensure these bodies’ independence and adequate capacity.



In addition, the recent action taken by the Anti-Corruption Unit to arrest and imprison the provincial court prosecutor in Porsat province, the senior police officers in Banteay Meanchey province and in Phnom Penh, who were involved in corruption activity, drew remarkable attention from the public and concerned stakeholders to watch and re-assess the political will of the Cambodian government in fighting corruption.

For the Royal Government of Cambodia, good governance is the most important pre-condition to achieving sustainable economic development with equity and social justice. Good governance requires the active participation and commitment of all segments of society, accountability, transparency, equality, inclusiveness, and the rule of law. During its third mandate, the Royal Government of Cambodia decided to focus its efforts to ensure an effective implementation of its Governance Action Plan which covers four cross-cutting areas:

- (i) Combating corruption
- (ii) Judicial and legal reforms,
- (iii) Civil service reform covering decentralization and de-concentration, and
- (iv) Reform of the armed forces, especially demobilization.

Based on the Rectangular Strategy, the key thrust of the Royal Government of Cambodia's approach to fight corruption is to take concrete action that attacks the root of the problem. The implementation of an anti-corruption strategy will be supported with sufficient tools and resources to prevent and to substantially crack down on corrupt entities. These resources will be used to set ethical standards for civil servants, enact anti-corruption legislation, enforce sub-decrees on public procurement and strengthen enforcement and scrutiny. The Royal Government of Cambodia recognizes that without credible actions in these areas, the basic virtues of good governance will not take hold in Cambodia.

In 2003, Cambodia endorsed the Asian Development Bank (ADB)/Organisation for Economic Co-operation and Development (OECD) Anti-Corruption Action Plan. Cambodia is also a party to the South East Asian Parties Against Corruption. Cambodia signed the United Nations Convention Against Corruption (UNCAC) in 2007.

In October 2009, the Cambodian Parliament passed the Penal Code, which contains all of the criminal elements outlined in the then draft Anti-Corruption Law, including definitions and penalties. The Penal Code comes into force in late 2010. In December 2009, the draft Anti-Corruption Law

was also passed by the National Assembly and Senate in March 2010. The Anti-Corruption Law was promulgated by the King of Cambodia on April 17, 2010.

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

In light of these recent developments and based on the Cambodian Government's strategy, the environment and opportunities for civil society organizations to implement activities to address corruption issues are more encouraging than ever before.

#### 4. PROGRAM RATIONALE

**Research:** Though corruption is a well-known, persistent, and increasingly documented problem in Cambodia, comprehensive high-quality academic research is still needed to complete and refine existing knowledge of the phenomenon. This is particularly important as international research suggests that different types of corruption have different effects in developmental terms.

Solid studies are required for designing effective policies and adopting a strategic and targeted approach to tackling corruption. Based on its experience in conducting research on corruption around the world and the tools that it has developed, TI can support research by Cambodian specialists and academics on corruption in Cambodia. The results of these studies will be used as a basis for the awareness raising and policy related advocacy activities.

**Institutional coherence:** Essential anti-corruption work has already been done in Cambodia since corruption is among the most critical issues that hinder effective economic development as identified by both the state and non-state institutions. In fact, fighting corruption has been on the agenda of the government for the last 10 years, but has been granted greater priority after the adoption of the Anti-Corruption Law and the current National Strategic Development Plan (NSDP). Nevertheless, more institutional coherence remains to be achieved among key agencies tasked with the fight against corruption in Cambodia.

Particular attention needs to be paid to tackling problems of institutional overlap and gaps. Appropriate monitoring and support to ensure that agreements are implemented will be essential. Special attention should be paid to supporting the strengthening of the Anti-Corruption Unit and the

National Council Against-Corruption, and their roles in coordinating, guiding, steering and supervising the anti-corruption efforts.

One of the main causes of the corruption situation in Cambodia is that the existing agencies and organizations tasked with anti-corruption duties still fail to keep up with socio-economic developments in Cambodia. Drawing on experiences from across the TI movement in supporting anti-corruption institution building and policy making, TI can play an important role in supporting Cambodian anti-corruption agencies' development and strengthening.

**Public administration and judiciary reforms:** The Cambodian government has shown commitment to fighting corruption by adopting the Anti-Corruption Law and strengthening anti-corruption institutional arrangements. However, combating corruption will require work on many fronts, including the critical public administration reforms and the judiciary reforms.

Donors and government discussions on public administration reform are vital and should involve and encourage public participation, and better transparency and accountability in the government's activities. Judiciary reform is fundamental to ensure the enforcement and the achievements of anti-corruption efforts. Based on its international experience, TI can support and participate in these discussions in a constructive manner.

**Private sector:** The fight against corruption cannot be successful if it only concerns governmental institutions. Private sector and society play a fundamental role in fighting corruption. Despite some effort in the past to mobilize the business community in addressing corruption, a lot remains to be done. Clean business principles and ethics, and "integrity pacts" have to be promoted while legislation is strengthened to fight against private agents of corruption. TI's experience and tools can support Cambodian efforts to promote anti-bribery tools and a cleaner business environment.

**Media and society participation:** A successful fight against corruption requires a multi-pronged approach involving various stakeholders. Even if clarifying jurisdictions, improving the regulatory framework and strengthening capacity through the training of key personnel are all important activities, they will fail to have the desired effect unless loopholes available to those abusing their entrusted power are exposed and closed off.

While there are constraints in what can be achieved in making officials accountable, the Anti-Corruption Law provides opportunity for a watchdog role of society and the media. So enhancing awareness and promoting the role of the entire society in preventing and combating corruption is

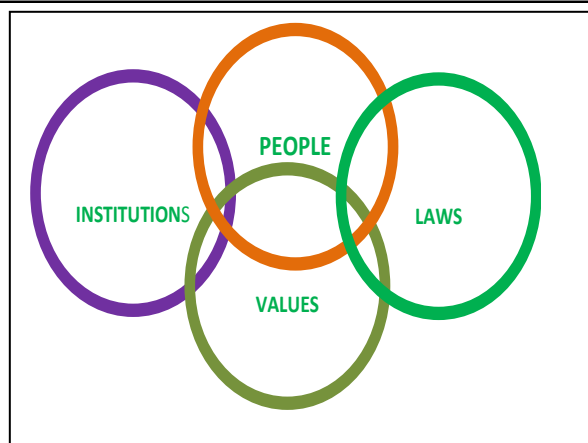
vital. Much of the work needs to focus on building confidence among officials that activism from society and media is not to be feared, whilst adopting a staged approach to strengthening their oversight role.

An important part of this process consists of training media and NGOs in responsible reporting and strengthening mechanisms to protect citizens and journalists when they make complaints or highlight the existence of corruption. Building strong national anti-corruption ethics also implies that special attention is given to raising awareness amongst young people regarding the dangers of corruption. TI's extensive experience in this area can play a very important role in supporting these processes and also in mobilizing respected citizens towards the establishment of TI Cambodia as a National Chapter of TI.

## 5. VISION, MISSION, VALUES AND APPROACHES

TI Cambodia's **vision** is for Cambodians to live in a society free of corruption. Our **mission** is to work together with individuals and institutions at all levels to promote integrity and reduce corruption in Cambodia.

Our core **values** include integrity, accountability, transparency, solidarity, justice and democracy.



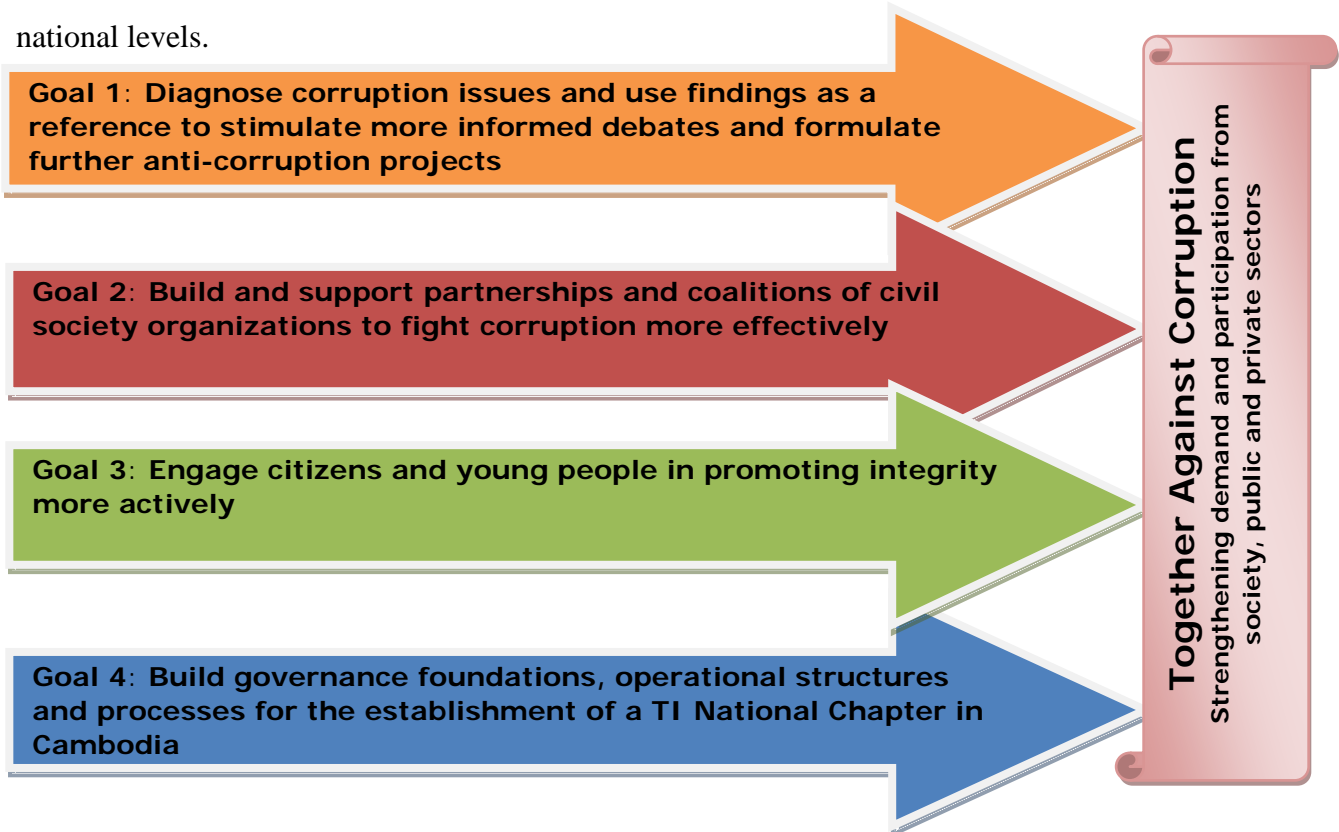
Our **approach** is to work across four interdependent areas including **people, values, institutions** and **laws**. Establishing itself to be a movement against corruption, we believe that people are fundamental to our work and we must promote public demand for integrity. As we seek sustained change we clearly recognize that ethics and values are key drivers, and we must educate people to live with their highest ethical values. We know that effective law enforcement is crucial to prevent a culture of impunity. We also believe that institutions across our societies must improve their transparency, in order to counter corruption and provide accountability to all.

## 6. STRATEGIC PRIORITIES 2012 - 2015

For the next three and half years, we are going to focus on four prioritized and strategic goals. To achieve all of them, we must perceive them as a single integrated activity, each reinforcing the others. These four prioritized activities will have an impact on four key areas of Cambodian society: the people, values, institutions, and laws.

As a National Contact of TI, we will get access to technical and financial support to achieve these areas. TI has a strong record of identifying, promoting and monitoring the legal and institutional reform that can reduce corruption.

As our movement against corruption grows, TI Cambodia will play roles in a variety of capacities. Working together, building coalitions and creating constructive engagement will be our guiding principles. In the pursuit of these, we will multiply the impact of our work from national to sub-national levels.



7. RESULTS FRAMEWORK	
Specific Program Goals and Activities	Expected Results/Impacts
<b>Goal 1: Diagnose corruption issues and use findings as a reference to stimulate more informed debates and formulate further anti-corruption projects.</b>	
<b>Activity 1.1:</b> TI Cambodia conducts National Integrity System Assessment (NISA)	<ul style="list-style-type: none"> <li>• Increased awareness about corruption issues within key institutions and their weakness and opportunities to combat corruption</li> <li>• Increased evidence based advocacies and projects on anti-corruption</li> <li>• Increased momentum and interest from relevant stakeholders and citizens in fighting against corruption</li> </ul>
<b>Activity 1.2:</b> TI Cambodia conducts Youth Integrity Survey (YIS)	<ul style="list-style-type: none"> <li>• Increased knowledge about youth perception toward corruption</li> <li>• Increased youth participation in promoting integrity and fighting against corruption</li> <li>• Increased demand and pressure from the youth for a corruption free society</li> </ul>
<b>Activity 1.3:</b> TI Cambodia collects and analyses all corruption-related studies or surveys conducted by other organizations	<ul style="list-style-type: none"> <li>• Increased knowledge and understanding about corruption, leading to increased and more effective evidence-based anti-corruption advocacy</li> </ul>
<b>Goal 2: Build and support partnerships and coalitions of civil society organizations to fight corruption more effectively</b>	
<b>Activity 2.1:</b> TI Cambodia works with development partners to organize high profile Annual National Anti-Corruption Conference (NACC)	<ul style="list-style-type: none"> <li>• Improved coordination and cooperation among anti-corruption stakeholders in making waves about the corruption issues and stronger demand for social integrity</li> <li>• Increased knowledge, expertise and experience about the anti-corruption tools resulted in more active and increased participation of the civil society organizations in fighting corruption</li> </ul>

<p><b>Activity 2.2:</b> TI Cambodia builds partnership and coalition among stakeholders (NGOs, young people, students, media and private sectors) through anti-corruption networking events and projects</p>	<ul style="list-style-type: none"> <li>• Increased cross-sector networking opportunities and engagements among anti-corruption stakeholders resulted in increased confidence and momentum in fighting corruption from across sectors</li> <li>• Increased awareness about anti-corruption matters as well as ongoing anti-corruption activities by different organizations</li> </ul>
<p><b>Goal 3: Engage citizens and young people in promoting integrity more actively</b></p>	
<p><b>Activity 3.1:</b> TI Cambodia in cooperation with the Anti-Corruption Unit creates joint projects to promote more active citizen engagement such as concerts and other awareness raising projects</p>	<ul style="list-style-type: none"> <li>• Increased citizens' participation in promoting integrity and in fighting corruption more actively</li> <li>• Strong partnership and collaboration between TI Cambodia and Anti-Corruption Unit demonstrates TI's approach of constructive engagement</li> </ul>
<p><b>Activity 3.2:</b> TI Cambodia works with NGO partners in Phnom Penh and in provinces to conduct activities that tackle corruption, and promote integrity and social accountability, including development of Integrity Pacts (IPs) and Advocacy and Legal Advice Centres (ALACs)</p>	<ul style="list-style-type: none"> <li>• Increased participation from NGOs and citizens in the provinces in project activities that promote integrity and fights against corruptions</li> <li>• NGO capacity and skills in anti-corruption projects are enhanced through partnership with TI Cambodia resulted in more NGOs and citizens' involvement in fighting against corruption</li> </ul>
<p><b>Activity 3.3:</b> TI Cambodia promotes and supports youth to youth initiatives</p>	<ul style="list-style-type: none"> <li>• Increased youth participation through youth-led-initiatives in promoting integrity and fighting against corruption</li> </ul>
<p><b>Activity 3.4:</b> TI Cambodia in cooperation with the Anti-Corruption Unit lobbies the Ministry of Education to have integrity included on education curricula, and promote transparent practices in schools regarding informal fee collections from students for teachers</p>	<ul style="list-style-type: none"> <li>• The Ministry of Education, Youth and Sports (MOEYS) agreed to incorporate integrity subjects in the education systems (both formal and informal)</li> <li>• A dozen of schools signed up for school integrity programs and became model schools.</li> </ul>
<p><b>Goal 4: Build governance foundations, operational structures and processes for the establishment of a TI National Chapter in Cambodia</b></p>	

<p><b>Activity 4.1:</b> TI Cambodia mobilizes eminent individuals to join and support its anti-corruption efforts</p>	<ul style="list-style-type: none"> <li>• Board of Directors and Executive Director comprising of eminent individuals from diversified backgrounds and expertise (development, human rights, democratic governance, youth development, private sectors and capacity development) are mobilized</li> </ul>
<p><b>Activity 4.2:</b> TI Cambodia participates in regional and international events (meetings, training workshops and exchange visits) organized by TI and its partners</p>	<ul style="list-style-type: none"> <li>• Improved knowledge and skills of the Management Staff and Board through participating in regional and international events organized by TI and its partners</li> </ul>
<p><b>Activity 4.3:</b> TI Cambodia has regular meetings with anti-corruption stakeholders</p>	<ul style="list-style-type: none"> <li>• Increased mutual understanding, trust and confidence as well as credibility among anti-corruption stakeholders</li> </ul>
<p><b>Activity 4.4:</b> TI Cambodia develops organizational framework and policies including by-laws, financial management manuals, and staff policies (already done)</p>	<ul style="list-style-type: none"> <li>• All legal documents and governance framework developed</li> <li>• TI Cambodia is legally registered with the Cambodian government and has a full legality and legitimacy to conduct its anti-corruption work</li> <li>• TI Cambodia and its core members have strong commitment and are working towards compliance with criteria and requirements of TI's Membership Accreditation Policy</li> </ul>



## 8. PROGRAM DESCRIPTION

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

Although corruption is a well-known phenomenon, whether people talk about it openly or not will depend on the availability of reliable sources of information. In that sense TI Cambodia, through TI-Secretariat will utilize its expertise and human resources from around the world to develop tools and conduct specific, in-depth assessments, research and studies, on corruption in Cambodia. The studies and assessments will include but not be limited to a National Integrity System Assessment (NISA), a Youth Integrity Survey, and a compilation of existing studies on corruption-related issues. The studies' findings and recommendations will be assessed and used as a reference to influence policy changes or stimulate further debate on the corruption issues in Cambodia.

To ensure public acceptance, partnership and ownership of the findings from the above studies and research, TI Cambodia will work closely with other relevant stakeholders including the Cambodian Government's Anti-Corruption Unit, NGOs and civil society organizations, media and other professional research institutes through the formulation of the Advisory Group.

In addition, TI Cambodia will look into best practices, examples and models from other countries in the region and from the around the world. Tools that have effectively been used to fight will be introduced to anti-corruption stakeholders in Cambodia, and adapted for use in the Cambodian context. TI Cambodia will play its role as a resource centre for supplying related anti-corruption tools and materials to Cambodian advocates.

Implementing these activities will lead to achieving the following results:

1. Reliable sources of reference on corruption issues in Cambodia will be made available for the public and stakeholders to use.
2. The society, especially the anti-corruption stakeholders will be more precisely aware of the specific corruption issues that matter to them and to the whole society. This awareness will generate greater reaction to corrupt acts and stronger demand for integrity.
3. More anti-corruption projects and initiatives will be generated and implemented after sharing the results from the research, studies and assessment as well as the collection of best practices, models and tools from other countries.

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

Fighting corruption by any means in Cambodia is still very dangerous, and doing so effectively requires a joint effort of many institutions and individuals from all different spectrums in the society including state and non-state actors, as well as individuals. Working closely with the leading anti-corruption development partners, we will play a role in facilitating coordination among the institutions that are actively engaged and involved in the fight against corruption. TI Cambodia will set up a supporting mechanism through which regular dialogues and exchange of information among these stakeholders and individuals, such as the high level anti-corruption dialogue, can be held.

This coordination mechanism will also contribute to promoting effectiveness and efficiency in the use of resources and expertise in implementing project activities to fight corruption. Moreover, it is also a very good avenue to facilitate the sharing of experience and knowledge among active anti-corruption institutions and advocates so that they can continue to improve and adopt their work and strategy as needed in a timely manner.

In addition, to fight corruption successfully also requires widespread public engagement on the issue. It also needs people to be equipped to take action. Consequently, a focus of TI Cambodia over the next three and half years will be to build and support coalitions among institutions and individuals from across Cambodia. These will include relevant government ministries, NGOs, youth and students, media, private companies, law enforcement institutions and local authorities.

Wherever and whenever possible and appropriate, joint projects will be developed to address corruption issues and promote accountability and transparency. These will be implemented by relevant institutions and interested organizations in cooperation with the Anti-Corruption Unit.

Implementing this goal will achieve the following results:

1. Resources to fight corruption will be more effectively and efficiently distributed among key stakeholders, while effective learning avenues will be facilitated regularly.
2. Cooperation and networking among many anti-corruption stakeholders will be established that multiply the impact of the work to fight against corruption.

3. A larger number of individuals and organizations in the coalition to fight corruption will be established which increases the influence to advocate for a better anti-corruption policy framework and law enforcements.

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

Raising awareness on the negative effects of corruption among the citizens is important but it is even more crucial to secure their active participation in the fight against corruption. In order to do so, TI Cambodia will create more opportunities for citizens to get involved in the fight against corruption by working with the Anti-Corruption Unit to design and implement those initiatives.

Engaging citizens is fundamental in our effort at project level. Citizens become more engaged once they understand the benefits of their involvement, and when they are provided the means and the skills to do so. In this sense, TI Cambodia will educate citizens not only about the harmful effects of corruption but also the skills and knowledge necessary for them to get involved in stopping it.

In order to do so, TI Cambodia will seek to work with NGO partners from across Cambodia in implementing various project activities. TI Cambodia will provide both technical and financial support to NGO partners so that they can work with citizens at all project levels.

In addition, TI Cambodia will actively engage youth in promoting integrity and accountability through supporting youth to youth initiatives and partnering with leading youth organizations and networks from across the country.

Furthermore, TI Cambodia will cooperate with the Anti-Corruption Unit and utilize the influence from its coalitions and partners to advocate for inclusion for education curriculum in the subject of integrity and ethical values in the education system. TI Cambodia will also seek to expand education on integrity through information systems and youth networks when appropriate and possible.

This goal will achieve the following results:

1. Citizens will have more opportunities and are encouraged to take part actively in promoting integrity.

2. Formally established institutions such as NGOs and CBOs from across Cambodia will benefit from technical and financial support from TI Cambodia to do anti-corruption work that largely engages citizens.
3. Various youth engagement initiatives will be established and led by youth organizations and networks bringing stronger voices from the young population of Cambodia.
4. Students and young people will receive education on integrity through formal or informal education programs. The hope is that they will uphold such values as they enter the workforce, and create greater demand for integrity in society.
5. Government, in particular the Ministry of Education, Youth and Sports, will agree to incorporate anti-corruption and integrity as subjects on the education curriculum.

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

For our institutions to fight corruption successfully, we must be equipped with the necessary skills and expertise. Therefore one of our prioritized areas for the next three and half years will be to build capacity of our institution and its core staff members. TI Cambodia has successfully mobilized a group of eminent individuals who will establish the foundation of a sustainable TI presence in Cambodia.

It is very important however, that TI Cambodia's core capacities are developed to use the tools and support to constructively participate in the national forum on corruption. Moreover, TI Cambodia must work in collaboration with various anti-corruption institutions such as the Anti-Corruption Unit, National Council Against Corruption and various civil society organizations towards the implementation of the necessary reforms and enforcement of the anti-corruption laws.

Tapping into the global expertise and resources of the worldwide TI movement, TI Cambodia has great opportunities to benefit significantly in regard to enhancing knowledge and skills. In addition, TI Cambodia will broaden its networks with other TI Chapters in all regions, through participating in regional meetings, and through appropriate Chapter exchange visits.

In addition, TI Cambodia must be institutionally strong in its internal governance, leadership, credibility, and legitimacy in the country. This is one of our priorities for the next three and half years. We will seek all capacity development opportunities provided by TI from around the world for

our own staff as well as developing our organizational capacity and governance systems over this period and beyond.

As TI Cambodia progressively develops its institutional capacity, it will gradually be seen as a bridge to global resources and expertise on anti-corruption after these three and half years and will begin to transform itself to be one of the capacity development institutions in anti-corruption work for Cambodia and for the region in the future.

This work will produce the following results:

1. TI Cambodia's Board of Directors and Executive Director comprising of eminent individuals from diverse backgrounds and expertise (development, human rights, democratic governance, youth development, private sectors and capacity development) are mobilized.
2. TI Cambodia's Executive Director and Board are given opportunities to participate in regional and international events organized by TI and its partners through which learning from and networking with other TI Chapters and international experts can be convened.
3. TI Cambodia is legally registered with the Ministry of Interior and has full legality and legitimacy to conduct its anti-corruption work.
4. Mutual understanding, trust and confidence between Cambodian stakeholders, in particular Cambodian institutions and TI-Secretariat in Berlin and TI Cambodia are achieved.
5. TI Cambodia and its core members have strong commitment and are working towards compliance with criteria and requirements of TI's Membership Accreditation Policy.
6. All necessary legal frameworks and organizational policies including: by-laws, financial management manuals and staff policies are in place.

## 9. RISK ASSESSMENT AND MITIGATION STRATEGIES

Potential Risk	Probability	Impact	Risk Mitigation Strategies
<p><b>Risk 1:</b> The environment for society to get involved in anti-corruption, including difficult access to information, makes the mobilization of researchers and citizens for planned activities difficult</p>	Likely	High	<ul style="list-style-type: none"> <li>○ The preparation phase of the program, which aims to strengthen confidence and trust with local stakeholders, and the coalition building principle of TI Cambodia are expected to help mitigate this risk in the long-term.</li> <li>○ The implementation of this three and half year program will hopefully orchestrate stronger demand from society for legislation on citizens' access to information.</li> </ul>
<p><b>Risk 2:</b> Some key stakeholders involved in anti-corruption in Cambodia are reluctant to engage with TI Cambodia because of its branding as a corruption fighter</p>	Unlikely	Medium	<ul style="list-style-type: none"> <li>○ TI Cambodia's approach of constructive engagement and the credibility of the Board of Directors together with the support of TI-Secretariat serve to counteract this reluctance risk.</li> </ul>
<p><b>Risk 3:</b> Some key government institutions are not willing to provide information necessary for the conduct of the National Integrity System Assessment (NISA)</p>	Likely	High	<ul style="list-style-type: none"> <li>○ Forming an Advisory Committee whose members are from key stakeholders including the Anti-Corruption Unit are expected to mitigate this risk</li> <li>○ Having good cooperation with the Anti-Corruption Unit and strong support from major development partners serves to counteract this risk</li> </ul>
<p><b>Risk 4:</b> Economic difficulties faced by the country (inflation, slow down of growth, flood, etc.) lead to erosion in political will and government drive in seriously addressing corruption</p>	Likely	High	<ul style="list-style-type: none"> <li>○ Through the regional presence of the Asia-Pacific Department of TI, strategies to fight corruption against the background of the crisis will be developed across countries. The findings of future research on the negative socio-economic effects of corruption will serve to help sustain</li> </ul>

			<p>interest against the erosion of political will</p> <ul style="list-style-type: none"> <li>○ Mobilizing civil society and engaging key development partners to highlight the importance of good governance and fighting corruption will contribute to mitigating this risk</li> <li>○ Orchestrating voters' desires to see political parties' platforms on fighting corruption will create pressure for the elected government to implement their anti-corruption pledges.</li> </ul>
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## 10. IMPLEMENTATION AND MANAGEMENT ARRANGEMENT

**Flexibility:** The context, the political sensitivity of the topic, and the various stakeholders involved in the implementation of the programs require that planned activities described in this strategic plan be amendable. This document should be seen as a living and evolving document. The action plans for the program which will be developed and corresponding budgets (attached in the Annex), will be reviewed annually by the Management Team and the Board of Directors. They will do this in consultation with key stakeholders in Cambodia and TI-Secretariat, seeking purposefulness, better synergies and greater efficiencies in the program implementation.

**Consultation:** An Advisory Group composed of key stakeholders in Cambodia: representatives of the Anti-Corruption Unit, the donors supporting the programs and other relevant Cambodian actors who are active in anti-corruption work, will be established. This group will meet twice a year to support and advise the implementation of the program.

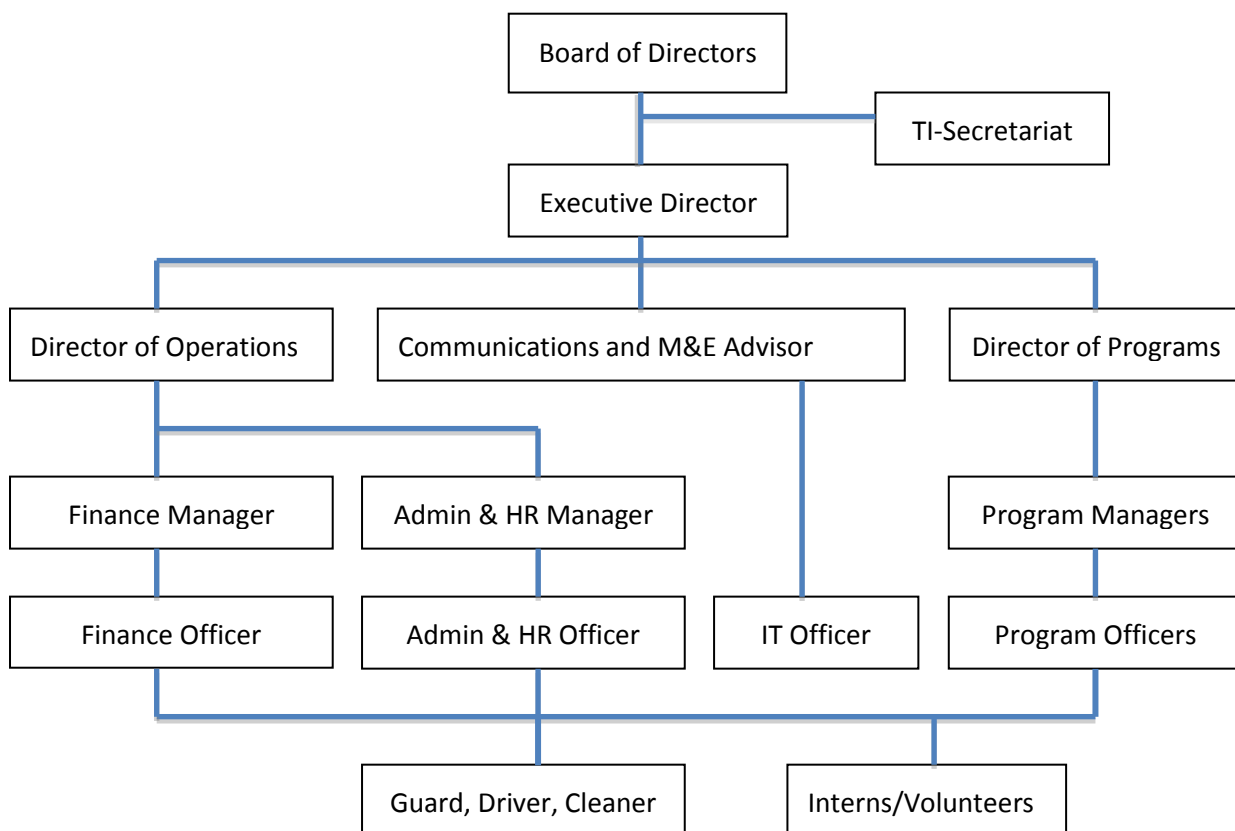
**Management:** The Board of Directors of TI Cambodia and assigned Regional Coordinator from TI-Secretariat will ensure the strategic direction and compliance of best practices, governance and management framework and policies of the organization and the proper management and accountability of funding. Regular board meetings will be held throughout the period to review and ensure proper compliance of the above policies and framework.

The Executive Director of TI Cambodia will oversee day-to-day management of the programs and entire operations. National Program Managers for each key component and program will be recruited

to manage and ensure effective implementation of the programs with support from project officers and support staffs who will be recruited on a required basis, dependent on available financial resources. When applicable and needed, experts and consultants (both local and international), including from the worldwide TI movement, will be mobilized as needed to ensure technical expertise, added value, quality and satisfied delivery of program outputs.

A Finance Manager supported by a Finance and Administrative Officer will be hired to ensure proper financial management and recordings and to meet professional audit requirements from the donors and TI-Secretariat.

## MANAGEMENT STRUCTURE





## 11. CROSS-CUTTING ISSUES

**Gender:** While there is no specific objective to address gender issues, TI Cambodia will pay particular attention to integrate gender issues in designing and implementing the activities of the programs. TI Cambodia will, for instance, ensure that research activities include gender dimensions. Gender-balanced view points and women's participation in training workshops, conferences and research, will be strongly encouraged.

**Environment:** The same approach will be followed regarding environmental issues to ensure that the environmental dimension is seriously taken into account when appropriate.

## 12. REPORTING, MONITORING AND EVALUATION

The programs will be monitored along with a set of indicators and results framework developed by TI Cambodia during the preparation phase in the first half year of the implementation of the Strategic Plan. Progressive and financial reports will be produced and sent to respective donors bi-annually for donors' review and approval.

In the process of approving these reports, bi-annual and annual review meeting between the donors and TI Cambodia and its Board of Directors will be organized to discuss the financial and narrative report as well as the operational plans and budget for the coming 6/12 months.

Annual independent audits will be conducted which will be financed by the program funding.

## 13. FUNDING

TI Cambodia is seeking financial support from a small number of donor agencies based in Cambodia or abroad, which are committed to supporting the fight against corruption or good governance in Cambodia.

It is expected that the interested donor agencies will contribute financially to the program and will work in close cooperation during its implementation. TI Cambodia and the donors will agree on harmonized financial and progressive reporting. TI Cambodia will develop the detailed annual action plans and operational budgets, which will be approved by the donors.

## 14. PROGRAM SUSTAINABILITY

All proposed program activities are oriented towards long-term sustainability. For instance, Cambodian citizens, academics, organizations and the Government institutions will largely benefit from the proposed activities. More fundamentally, the establishment of a home-grown National Chapter of TI, financially sustainable, is a key outcome of this program; if successful, this will guarantee the extension of the actions to be taken in the framework of this program.

## 15. PROGRAM IMPLEMENTATION PLAN

Below is a summary of implementation plan, which highlights key activities and indicative timeline. A more detailed work-plan will be developed at a later stage which will be then be subjected donors' approval.

<b>Key Activities</b>	<b>Pre-Phase Apr-Sep 2012</b>	<b>Year 1 Oct-Sep 2012-2013</b>	<b>Year 2 Oct-Sep 2013-2014</b>	<b>Year 3 Oct-Sep 2014-2015</b>
<b><i>1. Preparation Phase</i></b>				
1.1 Recruit staff (to start work in June 2012)	Apr-Jul			
1.2 Finalize Detailed Action Plan for Year 1	Apr-Aug			
1.3 Develop Monitoring and Evaluation Indicator	Jul-Sep			
1.4 Develop procedure and guidelines to select and provide financial support to partners	Jul-Sep			
1.5 Review and amend Financial Management Manual to improve financial management and control systems	Jul-Sep			
1.6 Develop comprehensive Terms of Reference (ToR) and Guidelines for recruitment of an external auditor which supplements the Financial Management Manual	Jul-Sep			
1.7 Develop Charts of Accounts for all Programs and Operations Line Items as applicable in the proposal	Jul-Sep			
1.8 Purchased Licensed Accounting Computer programs	Jul-Sep			
1.9 Carry out stakeholder analysis of actors involved in	Jul-Sep			

preventing and combating corruption in Cambodia				
<b>2. Program Implementation Phase</b>				
<b>Goal 1: Diagnose corruption issues and use findings as a reference to stimulate more informed debates and formulate further on anti-corruption projects</b>				
<b>Activity 1.1:</b> TI Cambodia conducts National Integrity System Assessment (NISA)		XXXXXXXXXXXXXXXXXXXXXXXXXXXX		
<b>Activity 1.2:</b> TI Cambodia conducts Youth Integrity Survey (YIS)		XXXXXXXXXXXXXXXXXXXXXXXXXXXX		
<b>Activity 1.3:</b> TI Cambodia collects and analyses all corruption-related studies or surveys conducted by other organizations		XXXXXXX		
<b>Goal 2: Build and support partnerships and coalitions of civil society organizations to fight corruption more effectively</b>				
<b>Activity 2.1:</b> TI Cambodia works with development partners to organize high profile Annual National Anti-Corruption Conference (NACC)		X	X	X
<b>Activity 2.2:</b> TI Cambodia builds partnership and coalition among stakeholders (NGOs, young people, students, media and private sectors) through anti-corruption networking events and projects		X	X	X
<b>Goal 3: Engage citizens and young people in promoting integrity more actively</b>				
<b>Activity 3.1:</b> TI Cambodia in cooperation with the Anti-Corruption Unit creates joint projects to promote more active citizen engagement such as concerts and other awareness raising projects		XXXXXXXXXXXXXXXXXXXXXXXXXXXX		
<b>Activity 3.2:</b> TI Cambodia works with NGO partners in Phnom Penh and in provinces to conduct activities that tackle corruption, and promote integrity and social accountability, including development of Integrity Pacts (IPs) and Advocacy and Legal Advice Centres (ALACs)			XXXXXXXXXXXXXXXXXXXX	
<b>Activity 3.3:</b> TI Cambodia promotes and supports youth to youth initiatives			XXXXXXXXXXXXXXXXXXXX	
<b>Activity 3.4:</b> TI Cambodia in cooperation with the Anti-Corruption Unit lobbies the Ministry of Education to have integrity included on education curricula, and		XXXXXXXXXXXXXXXXXXXXXXXXXXXX		



## 16. SUMMARY BUDGET 2012 – 2015

Code	Line Items	2012 Apr-Sep	2012-2013 Amount	2013-2014 Amount	2014-2015 Amount	Total Budget Amount (US\$)	Source of Funds		
							SIDA	Ausaid (TI-S)	Seeking Fund
0	Costs for activities during the Preparation Phase, including staff recruitment, program implementation and monitoring tool development, financial system set up, etc:	98,700.00				98,700.00	88,200.00	7,500.00	3,000.00
1	Goal 1: To diagnose corruption issues and use findings as reference to stimulate more informed debates and to formulate more projects on anti-corruption		98,245.00	176,076.80	130,906.60	405,228.40	230,600.00		174,627.60
2	Goal 2: To build and support partnership and coalition of civil society organizations to fight corruption more effectively		115,900.00	135,000.00	159,500.00	410,400.00	230,600.00		179,800.00
3	Goal 3: To engage citizens and the youth in promoting integrity more actively		250,900.00	336,000.00	415,700.00	1,002,600.00	594,800.00		407,800.00
4	Goal 4: To build governance foundations and operational structures and process for the establishment of TI National Chapter in Cambodia		113,994.93	145,519.93	130,944.93	390,459.80	269,509.80	7,000.00	113,950.00
5	Auditing Cost		3,500.00	3,500.00	3,500.00	10,500.00	8,000.00		2,500.00
6	Other operations costs and staff benefit (health, pension, bonus, etc)	9,870.00	58,253.99	79,609.67	84,055.15	231,788.82	142,170.98	1,450.00	88,167.76
<b>Grand Total Budget 2012-2015</b>		<b>108,570.00</b>	<b>640,793.93</b>	<b>875,706.41</b>	<b>924,606.69</b>	<b>2,549,677.02</b>	<b>1,563,880.78</b>	<b>15,950.00</b>	<b>969,845.36</b>
							<b>61.34</b>	<b>0.63</b>	<b>38.04</b>
							<b>%</b>	<b>%</b>	<b>%</b>