

# U4 Expert Answer



## Cambodia: Overview of corruption and anti-corruption

### Query

**Can you provide an overview of corruption and anti-corruption in Cambodia?**

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### Summary

Cambodia, often referred to as an autocracy with Hun Sen ruling for over 31 years, has endured periodical political unrest for decades, and there is “no end in sight” (Radio Free Asia 2016) as the current political crisis has escalated in 2016.

Corruption permeates every aspect of the Cambodian social fabric; the elite has monopolised procurement, land concessions and access to resources through the establishment of patron-client networks. A kleptocratic bureaucracy thrives on red tape, while the population is disillusioned with governance institutions.

Despite a relatively good anti-corruption law that came into full force in 2011, its implementation has been weak and corrupt entities continue to function with impunity (Transparency International Cambodia 2014).

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## 1. Overview of corruption

### Background

A democratic constitutional monarchy with the ruling Cambodian People's Party (CPP) and prime minister at the helm, Cambodia is inching its way towards establishing peaceful democratic stability. Despite a long history of war, genocide and political violence, according to a World Bank [press release](#) from 2014, Cambodia has exceeded the Millennium Development Goal poverty target and is one of the best performers in poverty reduction worldwide, with the poverty rate more than halved, from 53% (2004) to 20.5% (2011) (World Bank 2014).

The country's [thriving economy](#) and declining rates of child mortality (World Bank 2016) and [HIV/AIDS](#) (Ministry of Planning 2010) should not obscure the fact that large swathes of the population continue to rely on subsistence agriculture and that the cost of labour in Cambodia is among the [cheapest worldwide](#), drawing manufacturing businesses from around the globe (Donati 2015). Despite these changes, Cambodia still faces [serious impediments](#) to inclusive development, including weak public service delivery, ineffective management of land and natural resources, as well as environmental sustainability and good governance challenges (World Bank 2016). A common thread running through these issues is the problem of systemic corruption that costs Cambodia hundreds of millions each year in lost revenue (Transparency International Cambodia 2014; Lindsay 2016).

### Extent and forms of corruption

#### Extent of corruption

Cambodia is now perceived as the [most corrupt country](#) in the Association of South East Asian Nation (ASEAN) (Parameswaran 2016) according to Transparency International's [Corruption](#)

[Perception Index \(CPI\) 2015](#), with a score of 21 out of a possible 100 points (Transparency International 2015a). The index measuring the perceived levels of public sector corruption places Cambodia at 150 out of 168 surveyed countries.

In recent years there have been some small signs of progress; although 25% of the respondents surveyed for the [Global Corruption Barometer](#) in 2013 believed that corruption levels had stayed the same in the country, 40% were of the opinion that it had decreased a little (Transparency International 2013). However, in other comparative assessments of transparency, the country has been backsliding, in the [Open Data Index](#), Cambodia slipped from 77 out of 122 countries in 2014 down to 108 in 2015. Considering the on-going political crackdown, this trend is concerning and suggests a blatant lack of transparency and accountability in the political milieu.

According to the World Bank's [Worldwide Governance Indicators 2015](#), which measure six key dimensions of governance, Cambodia still fares poorly on all fronts despite its relative improvement in most areas over the last five years (compared to the [2010 scores](#)). The low scores (percentile rank 0 corresponds to lowest, and 100 corresponds to highest rank) in voice and accountability (18.72), political stability and absence of violence (43.81), government effectiveness (25.48), regulatory quality (35.10), the rule of law (17.31), and control of corruption (12.50) highlight the widespread and endemic forms of corruption that permeate every aspect of the Cambodian daily life.

The [Freedom House Report](#) 2016 for Cambodia listed its status as being "not free" with a freedom rating of 5.5 (1 being the best and 7 being the worst). Furthermore, it scores a 5 and 6 with regard to civil liberties and political rights respectively. These facts help showcase that the principal-agent form<sup>1</sup> of corruption in Cambodia exists on the grand as well as petty scale.<sup>2</sup> Moreover, it demonstrates the kind of collective action problem<sup>3</sup> when

<sup>1</sup> A principal-agent problem is a problem in which one or more actors (individuals or organisations) – the "agents" – are entrusted with authority to act on behalf of some other individual, group or cause (the "principal"). However, the principal(s) often monitor and control the agents, which creates the risk that agents may act in their own interest rather than that of the principal(s) (Stephenson 2015).

<sup>2</sup> Grand corruption consists of corrupt acts committed at

high levels of government, enabling leaders to benefit while perverting the public good. Petty corruption involves low- to mid-level officials who abuse their entrusted power in everyday interactions with ordinary citizens, such as in the course of service delivery (Transparency International Cambodia 2014).

<sup>3</sup> A classic collective action problem, according to Mancur Olson (1965), occurs when, even if it is in the best interest of all individuals in a group (or across groups) to act collectively towards a common goal, group

addressing corruption in this country where there is a general distrust in society due to its long history of violence.

## Forms of corruption

### Political corruption

The most significant arena of abuse of public office for private gain is the political sphere in Cambodia. In a country in which cases of rampant political corruption are commonplace, it is no surprise that 28% respondents of the [Global Corruption Barometer 2013](#) believed that the political parties were “extremely corrupt” (Transparency International 2013). Moreover, the lack of [legislation](#) regulating financial contributions to political parties or a party’s campaign finance creates opacity in governance that is immensely challenging to overcome (Global Integrity 2012). In 2014, for instance, the National Assembly did not allocate 44% of the annual budget (US\$1.5 billion), which made it [possible](#) for Prime Minister Hun Sen to spend this at his discretion (Bertelsmann Stiftung 2016).

Similarly, appointments to the central positions in the bureaucracy are made on party political lines and are generally immune to the rule of law (Bertelsmann Stiftung 2016). Members and commanders of government security forces (belonging to the ruling Cambodian People’s Party) have enjoyed impunity from investigations and prosecution for [grave human rights abuses](#), including political assassinations, other extrajudicial killings and torture. Politically biased police, prosecutors and judges pursued at least 87 [fabricated](#) cases against the opposition Cambodian National Rescue Party (CNRP) leaders and activists, members of other opposition groups, leading trade unionists, civil society organisers and ordinary factory workers from Phnom Pen (Human Rights Watch 2015a).

Human Rights Watch [observes](#) that the course of Hun Sen’s 31-year reign has witnessed him making direct threats to those in the opposition. In a speech on 5 August 2009, he mimicked the triggering of a gun while warning critics not to use the word “dictatorship” to describe his rule. On 20 January

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members do not do so; instead, group members find it in their individual interest to not contribute at all or to limit their contributions, ensuring that the collective benefit is not realised to its fullest potential.

2011, responding to the suggestion that he should be worried about the overthrow of a dictator in Tunisia at the time of the “Arab Spring,” Hun Sen lashed out: “I not only weaken the opposition, I’m going to make them dead ... and if anyone is strong enough to try to hold a demonstration, I will beat all those dogs and put them in a cage.” (Human Rights Watch 2015b)

The 2013 National Assembly elections are a prime [example](#) showcasing the forms and extent of political corruption in Cambodia. In these elections, the Cambodian People’s Party (CPP) won 68 of 123 seats, its poorest performance since 1998. The CNRP won 55 seats. However, according to a [joint report](#) on the conduct of the elections by the Electoral Reform Alliance (ERA)<sup>4</sup> found that there were severe irregularities in the process and conduct of the elections, which prejudiced the result in favour of the CPP (Meyn and Reaksmey 2013). The [Freedom House Report 2016](#) notes that even the National Election Committee (NEC) identified more than 250,000 duplicate names and 290,000 names missing from voter rolls.

CNRP rejected the official results, stating that it had won 63 seats. After its petition for the creation of an independent authority to investigate its claims was unsuccessful, all 55 CNRP members boycotted the new National Assembly until the two parties reached an agreement in July 2014. The incumbent government agreed to recognise a minority leader in parliament, responsible for representing opposition interests to the prime minister, a first for the democratic process in Cambodia. Furthermore, a new NEC was to be created with members appointed by both parties. This new election commission is considered less partisan than its predecessor, but it is yet to be [tested](#) in a national election (Freedom House 2016).

However, despite the truce, there have been incidents of tension between the two parties with reports that the Hun Sen led CPP have deployed a [dividing strategy](#) for its opposition in preparation for the upcoming 2018 general elections, undermining the previous understanding between the parties of a “culture of dialogue” (Willemyns 2016). However, there have been more controversial developments.

<sup>4</sup> The ERA consists of 11 civil society organisations (CSOs) including Transparency International Cambodia.

For instance, the CNRP quota vice president of the National Assembly was voted out by the CPP, and the minority leader was [convicted](#) on charges of defamation and is now in exile “in a move that contradicts domestic laws and violates international conventions signed by the Cambodian government” (The Cambodia Daily 2016).

It should also be noted that the lack of political finance regulations creates situations that allow corrupt political practices. The CPP is known to use state resources for party purposes. Moreover, direct gift giving to individuals, in the form of cash, food and medicine, is another common campaign method in Cambodia, and all parties participate in this practice (National Democratic Institute for International Affairs 2005). According to the country’s Anti-Corruption Unit, party leaders are placed in an awkward bind; while on the one hand voters demand an anti-corruption agenda from politicians, they still expect to be paid for their votes (National Democratic Institute for International Affairs 2005).

Corruption is prevalent not only in the national election process but also in political transactions in general. Within parties, those who contribute financially to the party are rewarded with preferred slots on the party’s electoral lists and high-ranking government positions. Inter-party “candidate purchasing”, is also reported, where opponents buy that party’s candidates or officials to ruin a party’s image (National Democratic Institute for International Affairs 2005). Furthermore, business leaders, including those involved in illegal industries, contribute to political parties and campaigns expecting rewards. These rewards come in the form of government contracts, tax breaks, or agreement to overlook illegal activities (National Democratic Institute for International Affairs 2005).

Nevertheless, to combat voter fraud, the NEC has shifted to a digitalized voter registration system from the manual one they had in place. The [new system](#), which was made possible by the donation of over 25 kinds of electronic equipment (including 2400 HP notebooks and 2425 computer monitors) by the European Union, links names to thumbprints, ensuring that each Cambodian gets one vote, and can only exercise this right under their own name. It also prevents the “ghost voter” problem, where registered voters are found to be nonexistent. However, the registration process that began from 1 September 2016 and is scheduled till

29 November 2016, has faced ample challenges with the number of communes rising from 1633 to 1644. Furthermore, the rainy season, unreliable electricity and lack of Internet connectivity have added to the problems in registering voters in the countryside. (Khmer Times 2016). Whilst on the one-hand soldiers can register in different places, the [same does not apply](#) for migrant workers. Yong Kim Eng, president of the People Center for Development and Peace (PDP-Center) said that according to their data, many youths were unaware of how to register to vote in next year’s commune elections. “Youths are more than half of the country’s citizens, some of whom are migrants working in foreign countries and are facing the loss of their right to vote if they do not go to register. This is a concern as there might be a problem for the democratic process if the youth do not participate.” (Verified Voting 2016)

### **Bureaucratic corruption**

Going hand in hand with endemic corruption in politics is the widespread improbity affecting the bureaucracy. Of the respondents to Transparency International’s [Global Corruption Barometer 2013](#), 62% reported having paid a bribe to the registry and permit services (Transparency International 2013). Paying bribes to gain access to essential public services, such as school grades, health care, permits, licences, and birth and marriage certificates, is commonplace and deprives citizens of essential public services. Furthermore, nepotism and patronage are twin scourges in the bureaucracy, [responsible](#) for undermining the crucial functions of public services (Freedom House 2016). For example, following the unexpectedly poor showings in the 2013 elections, the CPP forced several party members to resign so that the sons of high-ranking party leaders, including those of Prime Minister Hun Sen and Interior Minister Sar Kheng, could assume seats in parliament in a bid to build political dynasties (Freedom House 2015).

A [national survey](#) on youth perceptions and integrity carried out by Transparency International Cambodia in 2015 found that 60% of youth interviewed were willing to pay a kickback of 10% to 20% of their future salary to a person who secured them a job, even though 99% of the respondents agreed that corruption was a major impediment to national development.

According to a report which is part of the [Bertelsmann Stiftung’s Transformation Index’s \(BTI\) Country Report on Cambodia](#), the abuse of

public office for private gain is the norm rather than an exception in the bureaucracy (Bertelsmann Stiftung 2016). There are two key challenges to improving probity in the public sector. Firstly, salaries for public officials are far from sufficient to live on, which exacerbates rent-seeking behaviour. Secondly, the low probability of being sanctioned for the abuse of public office has created an atmosphere in which bribery flourishes and a culture of corruption thrives (Bertelsmann Stiftung 2016). As long as politicians, civil servants and members of the security forces remain loyal to their superiors, they enjoy a great deal of discretionary power. Mechanisms to monitor corruption are rare or weak, what accountability exists is not to the public but rather vertical in nature: public officeholders are often expected to share their earnings with their direct superior (Bertelsmann Stiftung 2016).

### Corruption in business

Cambodia's World Bank [Doing Business](#) rank for 2017 is 131 out of the 190 surveyed economies. Setting up of firm requires, on average, nine procedures and a period of 99 days, which is 75 more days than the other countries in the surrounding East Asia and Pacific region. Moreover, the cost is 57.2% of per capita income, compared to 19% for neighbouring areas. Indeed, Cambodia is rated as one of the most difficult countries in the world in which to start a business (180 out of 190 economies), demonstrating the extensive red tape that companies have to deal with to merely establish themselves (Doing Business 2016). The US Ambassador to Cambodia, William Todd, [stated](#) in 2013 that major American companies are reluctant to invest in the country as they view it as indelibly corrupt (Woods and Bopha 2016).

In terms of assessing the business bribery risk,<sup>5</sup> which considers business interactions with government, anti-bribery laws and enforcement, government and civil service transparency and the capacity for civil society oversight, [Trace Matrix](#) 2014 ranks Cambodia 193 out of 197 countries worldwide. Though regulatory requirements for basic health, environmental and safety standards for businesses exist and should be publicly

available by law, enforcement remains inconsistent (GAN Business Anti-Corruption Portal 2015).

According to the [Global Integrity Report](#) 2012 business inspections by government officials often occurred in an ad hoc and arbitrary manner and were conducted to extract illicit payments or unofficial fees. The percentage of firms expected to give gifts to secure government contracts is 87.5 according to the [Enterprise Surveys](#) data 2016. Companies are assumed to pay bribes and make [facilitation payments](#) regularly to get construction permits and to establish electrical and water connections (GAN Business Anti-Corruption Portal 2015). These examples show the existence of both extortionary (as seen in the former) and collusive (as seen in the latter) forms of bribery.

To tackle these issues the Anti-Corruption Unit (ACU) has started [signing](#) Memorandums of Understanding (MoU) with private companies that are primarily aimed at preventing illicit payments to government officials and creating a clean and transparent business environment. Preap Kol, executive director of Transparency International Cambodia, said "the companies [that sign the MoU] send a message to the public that they cannot commit corrupt acts, meaning that corrupt officials who used to ask for money earlier cannot do it anymore." So far 23 companies have signed MoUs including Cambodia Beverage Company, Phnom Penh Special Economic Zone (PPSEZ), Cambodia Higher Education Association, and Tata South East Asia. (Chandara 2016)

### *Main sectors affected by corruption*

#### Judiciary

Cambodian courts are regarded as being extremely corrupt by 60% of the respondents, while 68% of the respondents to Transparency International's [Global Corruption Barometer](#) 2013 reported having paid a bribe to obtain justice. Judiciaries across the world are expected to be sacrosanct protectors of the rule of law; however, the [Freedom House Report](#) 2016 found that this institution in Cambodia is marred by inefficiency, corruption and a lack of independence. There exists a severe shortage of lawyers, and the

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<sup>5</sup> The risk of business bribery in foreign countries exposes a company to the possibility of violating anti-corruption laws such as the Foreign Corrupt Practices Act (FCPA) and other international anti-bribery

regulations, which prohibit bribery of foreign government officials.

system's poorly trained judges are subject to political pressure from the CPP (Freedom House 2016). Suspects and prisoners are subjected to abuse by law enforcement officers, including through illegal detention (Human Rights Watch 2015a).

According to the Cambodian League for the Promotion and Defence of Human Rights (LICADHO), the courts are used as a **tool** by the ruling elites (Bertelsmann Stiftung 2016). Political opponents and critics of the government are routinely silenced, impunity for state actors and their associates is guaranteed, and the courts protect the economic interests of the wealthy and powerful. In recent years, human rights activists have been convicted in trials based solely on political motives and lacked legal evidence (Freedom House 2015a).

Even becoming a judge **necessitates paying bribes** of up to six-figure sums in US dollars by graduates from law schools. Often a favourable judgment is only given to justice seekers if they have made adequate payments to the judge presiding over their case (Bertelsmann Stiftung 2016).

The "three new laws" passed in 2014 during the boycott of the National Assembly by the CNRP have **severely affected** judicial independence (Human Rights Watch 2015a). In particular, the central role of the **minister of justice** in critical decision-making appointments, promotions, disciplinary action and budgetary finance, has paved the way for encroachment by the government on areas properly reserved for the judiciary (International Bar Association 2015).

Thus, it comes as no surprise that the **World Justice Project** Rule of Law Index 2016 ranked Cambodia 112 out of 113 countries and **last** in the East Asia and Pacific region (Maza 2016).

### Police force

After the judiciary (Sassoon 2016), the police are viewed as being the most corrupt institution; 65% of respondents to the **Global Corruption Barometer** reported paying bribes to the police. Cambodian police officials abuse their power with impunity, and often receive kickbacks for protecting the owners of illegal businesses (GAN Business Anti-Corruption Portal 2015).

According to **several reports**, an upward bribery chain operates, as police officers have to pay a percentage of their earnings to higher-ranking

officers in cash or goods. It is also apparently routine practice for police officers to pay bribes to secure a promotion, as "such bribery is not uncommon in Cambodia's bureaucratic kleptocracy" (Dara and Turton 2016). Moreover, a new law that came into force in January 2016 caused a **fivefold increase** in traffic fines and allowed for issuing officers to keep 70% of all cash collected as an attempt to curb corruption, essentially legalising bribery (Campbell 2016; Vida 2015).

### Natural resource management

Cambodia, like many other countries, falls prey to the "natural resource curse". Abuse of public office involving bribery of public officials, corruption in the procurement process and lax law enforcement is often a key enabling factor in land grabbing, illegal logging, and mining by private and state owned enterprises which **strip the country** of valuable assets and cause extensive damage to the environment (GAN Business Anti-Corruption Portal 2015; Peter 2014; Un and So 2009; Global Witness 2016; Global Witness 2007). An **example** of this is the fact that relatives of Prime Minister Hun Sen and other senior officials lead the country's most powerful logging syndicate. (Global Witness 2007).

**Another example** is an agriculture company linked to the Hun family that is accused of using arson attacks and cobras to evict people from their homes. This has been filed as one of a huge dossier of cases at the International Criminal Court as evidence that Cambodia's ruling elite has committed land grabbing at such scale that it amounts to crimes against humanity (Global Witness 2016).

Even given this, Global Witness was unable to find a single case where a member of the Hun family has been prosecuted or held to account for their part in any alleged wrongdoing.

Cambodia has become a major supplier of sand to Singapore; however, in 2016, a **US\$750 million discrepancy** was uncovered between the country's documented sand exports and Singapore's recorded imports (Willemyns and Dara 2016). According to the UN Commodity Trade Statistics Database, between the years of 2007 and 2015, the Cambodian authorities reported exporting US\$5.5 million worth of sand to Singapore. However, **the database** shows for that same period, Singapore imported US\$752 million in sand from Cambodia. This shortfall, totalling hundreds of millions of dollars and first reported by Radio Free

Asia, most likely points to corruption, observers said (Handley 2016).

Where environmental regulations exist, they are typically not enforced in a just manner. Kleptocratic business elites are reportedly able to subvert the law to their advantage due to their political connections. An [example](#) of this is the rise of the “rubber barons” who profit from privileged access in the hunt for land concessions in the logging trade (Global Witness 2013).

The tragic effects of corruption in natural resource management is exhibited by the fact that Cambodia experienced one of the highest [national rates](#) of forest loss from 2000 to 2012, according to a [recent study](#). (BBC News 2013; Hansen 2013)

### Procurement

Corruption is rampant in Cambodia's public financial management system, with procurement being a key weakness. Government decisions to award contracts is not transparent and subject to [significant irregularities](#) (GAN Business Anti-Corruption Portal 2015). Favouritism is reported to play a major role in public officials' decisions (World Economic Forum 2015). Specific examples include petroleum-related contracts being drafted on an ad hoc basis, undermining consistency and providing opportunities for kickbacks. The Asian Development Bank [seconds](#) these observations, pointing to on-going informal links between the ruling party, medium-sized and large businesses, and senior levels of government (Evans 2013).

For example, a Global Fund investigation into grants to Cambodia found that in 2013, former National Centre for Parasitology, Entomology and Malaria Control (CNM) director Duong Socheat and another top official at the CNM were found to have taken about US\$410,000 in “commissions” in exchange for handing out millions in lucrative procurement contracts paid for by the Fund to Fight AIDS, tuberculosis and malaria (Global Fund 2013). In response to this scandal, one [ministry official](#) said, “It's gotten worse since Huy Rekol became director” and that it has resulted in “a culture of nepotism and corruption”. According to another ministry official, Rekol is fond of saying that some of those accused of corruption are like “family”. One of those officials, and the one against whom some of the most serious charges are levelled, is Math Imran, the chief of the administrative bureau within the CNM as of 2015. According to the insider's accounts, while he was still deputy administrative chief, Imran secured contracts for at least six family members and

friends, including his sons, Math Safari and Ran Sany; his younger brother Math Hakim; and a nephew, Ton Samfanna (White and Sengkong 2016).

### Human rights violations

A culture of corruption enabling impunity against prosecution legitimises an atmosphere where fundamental human rights are regularly violated. According to a 2015 [report](#) by Human Rights Watch, it is common practice for the authorities to detain hundreds of people they deem to be “undesirable”, without judicial recourse in so-called drug treatment centres where they face torture, sexual violence and forced labour. Alleged drug users, homeless people, beggars, street children, sex workers and people with disabilities are locked up in these centres for arbitrary periods. People held during an investigation or prosecution for common criminal offences or convicted in court, are also subject to routine torture and ill treatment. The police and prison authorities are known to beat, pistol-whip, electro-shock, kick, slap and punch inmates often until they become unconscious. Much of the torture is aimed at extracting confessions or extorting money (Human Rights Watch 2015a).

Another serious impediment to citizen's rights is the threat of trafficking. Cambodia is [considered](#) to be a source, transit and destination country for human trafficking (US Department of State 2015). The traffickers include organised crime syndicates, and even the parents, relatives, friends, intimate partners and neighbours of trafficking victims. Corruption facilitates trafficking practices in the process of transfer, transport and in general in the early stages of the trafficking journey.

Bribery and abuse of power are the most common forms of corruption reported, such as crossing of borders without any checks or with the cooperation of airline staff and visa officials (United Nations Office on Drugs and Crime 2011). The Cambodian government is placed on the tier 2 watch list in the 2015 US Department of State's Trafficking in Persons [Report](#) for “not fully complying with the Trafficking Victims Protection Act's minimum standards for the elimination of trafficking but making significant efforts to do so” (US Department of State 2015).

## 2. Legal and institutional anti-corruption framework

The Government of Cambodia's [official position](#) is that corruption is an "obstacle to economic development, the rule of law, democracy, social stability, as well as the main cause of poverty". It has adopted measures both on the international and domestic front to tackle corruption (Anti-Corruption Unit 2016).

### International conventions and initiatives

The Royal Government endorsed the Anti-Corruption Action Plan for Asia and the Pacific in 2003. Early priorities included the completion of the anti-corruption legal framework (which eventually took place in 2010), and the establishment of the Office of the Ombudsman and of specialised chambers within the court system to deal with the resolution of administrative and commerce matters (which is yet to be done). In 2007, the country became a party to the [United Nations Convention against Corruption](#), a first of its kind, global multilateral anti-corruption instrument. Being a part of ASEAN and a region with some of the fastest growing economies, Cambodia, along with other member states, have been called upon by Transparency International to [create](#) a regional body that makes fighting corruption a priority (Transparency International 2015b).

### Domestic legal framework

In its 4th Legislature (2008-2013), the government set out the [Rectangular Strategy phase II](#), to fight corruption, enhance public financial management, improve good governance, reduce poverty as well as promote the welfare of all citizens (International Labour Organisation 2008).

Keeping in line with this strategy, in 2010, the [Anti-Corruption Law](#) was passed and came into force in 2011 (Cambodia Investment 2010). The law was praised for being in line with international standards. It provides for measures of education, prevention and law enforcement to curb corruption. The law created the National Council Against Corruption (NCAC) and the Anti-Corruption Unit (ACU). Corrupt acts are covered and criminalised in the Provisional Criminal Code, which [criminalises corruption](#) in the form of active and passive bribery, abuse of office for private gains and extortion (GAN Business Anti-Corruption Portal 2015). It also criminalises accepting bribes

in the form of donations or promises. There is no limitation on the value of gifts, but they are forbidden if given with a corrupt intent. Facilitation payments are also prohibited (GAN Business Anti-Corruption Portal 2015).

Even though the law seems comprehensive, there are loopholes regarding [whistleblower protection](#) and greater independence of the Anti-Corruption Unit (Transparency International Cambodia 2016). Furthermore, anti-corruption legislation is not enforced effectively, and public officials continue to engage in corrupt practices without accountability (Transparency International Cambodia 2014). To tackle these issues the ACU is [currently drafting](#) a whistle-blower protection law, which should be completed by early 2017. Pech Pisey, director of programs at Transparency International Cambodia, lauded the ACU's decision to draft the law, saying the country's anti-corruption efforts would be stifled if such legislation were not passed. "Individuals need to be able to come forward and give evidence without fear of retaliation," he added. (Naren and Jensen 2015)

Article 13 of the [Anti-corruption Law](#) states that ACU officials should "take necessary measures to keep whistleblowers secure." Article 41, however, adds that Defamation or disinformation complaints on corruption lodged with the Anti-corruption Unit or court, which lead to useless inquiry, shall be punishable by imprisonment from one to six months and be fined from \$250 to \$2,500. (Cambodia Investment 2010) Senior opposition lawmaker Son Chhay said there was no point in drafting a new law unless Article 41 was repealed. (Naren and Jensen 2015)

There is [no freedom of information law](#) to guarantee access to information and increase transparency within government agencies. Public access to information is limited to documents that are not considered harmful to national security under the Archive Law (Freedom House 2016). However, the Ministry of Information (MoI) launched a website for public consultation on the long-awaited freedom of information law. The [website](#) which went live in January 2016 is made in conjunction with UNESCO with support from the Swedish government (known as the A2I Technical Working Group), and it [features](#) drafts of the upcoming public information law with comment sections where "visitors can write comments or requests for each article", according to MoI spokesman Ouk Kimseng. The law should be fully drafted by 2018. (Crane and Sengkong, 2016)



## Institutional framework

The country **lacks** a national ombudsman. While they do exist at the district/city level, these bodies do not receive adequate funding for their successful operation (Global Integrity 2012).

The **Anti-Corruption Unit (ACU)** was tasked with being the implementing agency of the 2010 Anti-Corruption Law (Anti-Corruption Unit 2016). Its role is to help in the fight against corruption based on three key pillars: education to raise awareness on the issue, prevention and obstruction of corruption and enhancement of law enforcement, along with the aim to win support from the public.

According to the South East Asia Parties Against Corruption, the ACU has fulfilled its duties as a State Party to United Nations Convention Against Corruption (SEA-PAC 2016). Nevertheless, as long as the threat of imprisonment exists for a person bringing a corruption-related complaint to the Anti-Corruption Unit, people are likely to be deterred from speaking up. The lack of transparent reporting mechanisms in turn reduces the accountability of the institution (Transparency International Cambodia 2014).

The **National Audit Authority (NAA)** is responsible for executing the external audit function of the government. The auditor-general is empowered to conduct audits of accounting records, accounts, management systems, operation controls and programmes of government institutions by generally accepted international auditing standards (ASEANSAI 2016). However, the work of NAA is undermined due to its lack of financial and human resources to meaningfully fulfil its mandate. Citizens are **not privy** to NAA reports (Global Integrity 2012).

The National Assembly Commission for the Protection of Human Rights and the Reception of Complaints was **established** in 2006 as a mechanism allowing citizens to voice their concerns and complaints concerning human right violations. It is also intended to be an advisory body to the government on relevant laws and has an education and awareness-raising mandate (CCHR 2012).

The chairing of Parliamentary Commission on Investigation and Anti-corruption was to be undertaken by Ho Vann of the CNRP, as a result of the political deal between the CPP and CNRP after the 2013 general elections. Opposition party chief whip Son Chhay says that the opposition's control

of the commission on anticorruption, agriculture, health and others should result in improved national institutions. (Carmichael 2014)

## Other stakeholders

### Media

The **Freedom House Report 2015** revealed that in April 2014, an unofficial English-language version of a draft cybercrime law was leaked, showing potential for a new law to restrict Cambodia's online sphere. Article 28 of the bill seeks to criminalise online activities that are seen to "hinder the sovereignty and integrity of the Kingdom of Cambodia", and penalties outlined in the draft legislation are more severe than the offline equivalent in the penal code. Despite a spokesman for the Council of Ministers saying that the law had been "scrapped" and was no longer a priority, concerns about increasing government control of the internet remain according to the 2015 report (Freedom House 2015).

Defamation, which includes written criticism of public officials or institutions, is a criminal offence punishable by large fines, and defamation cases against journalists are not uncommon (Freedom House 2015). Defamation is not directly punishable with jail time, but journalists can be imprisoned if they are unable to pay the associated fines. Among the defamation cases decided in 2014 was one against the Phnom Penh-based journalist and blogger **Rupert Winchester**, who claimed on his blog that a developer was planning to knock down a historic building in the capital. In July, he was convicted and fined US\$2,500 and ordered to pay an additional US\$25,000 in damages (Reporters Without Borders 2014). The violation of laws banning incitement and the dissemination of disinformation can result in jail sentences of as long as three years.

Reporters Without Borders' **World Press Freedom Index 2016** ranked the country 128 out of 180 which is 11 ranks ahead of its 2015 position. The organisation's Cambodia country report, however, cautioned that the media are all indirectly controlled by the state and are closely watched. Journalists can pay a high price for trying to cover illegal logging, trafficking in the fish industry or trafficking in other natural resources. Defamation and damaging the country's image are the most frequently used charges against journalists (Reporters Without Borders 2016).

### Civil society

Civil society is relatively weak in Cambodia, despite the international community's efforts to support its development. The fact that new NGOs are required to [register](#) with the Ministry of Interior to become a legal entity acts as an impediment to their functioning, especially for the anti-corruption and good governance NGOs. For example, it took Transparency International Cambodia (TI Cambodia) around three months to register with the Ministry of Interior in 2010 and would have taken longer if there was no follow-up and a strong commitment to achieve registration (Global Integrity 2012). Moreover, the new Law on Associations and Non-Governmental Organisation (LANGO) that states that organisations needs to politically neutral and respect Cambodian culture among many other vague and dangerous provisions has received [criticisms](#) from various CSOs including the Cambodian Development Human Rights Association (ADHOC) and Cambodia League for the Promotion and Defence of Human Rights (LICADHO). They have urged the Cambodian Constitutional Council to reject the "unconstitutional" LANGO. (LICADHO 2015)

The [recent arrest](#) and pretrial detention of human rights activists from the Cambodian Development Human Rights Association (ADHOC) in May 2016 (Front Line Defenders 2016), and the [killing](#) of Kem Ley, a prominent Cambodian political analyst known for his criticism of the government who was shot dead at a cafe in July 2016 in Phnom Penh, (Aljazeera 2016) are signs of the shrinking space for civil society in Cambodia.

Among the leading civil society organisations (CSOs) is [Transparency International Cambodia](#), which aims to fight corruption and promote integrity, transparency and accountability in the country. Apart from its reports, publications and surveys, it has come up with a [unique strategy](#) in its fight against corruption. Anti-Corruption cards are given to citizens who sign up to the Declaration Against Corruption. Participating businesses offer these cardholders discounts of up to 60% for their products and services (Rehbock 2015).

The [Cambodian Centre for Human Rights](#) (CCHR) is a leading NGO that works to promote and protect democracy and respect for human rights. They have run campaigns against impunity in Cambodia from 2013, and are rigorously involved in helping to deliver justice in areas such as land tenure security, digital security and freedom of expression (CCHR Cambodia 2016).

The [Cambodian Human Rights Action Committee](#) (CHRAC) is a coalition of 22 CSOs fighting corruption and human right abuses. It is involved in advocacy and monitoring functions. Recently, it has kept a close watch on the [Extraordinary Chambers in the Courts of Cambodia](#) (ECCC) or Khmer Rouge Tribunal assessing human rights violations under the Khmer regime from 1975 to 1979 (CHRAC 2016).

The [Cambodia League for the Promotion and Defence of Human Rights](#) (LICADHO) is one of the largest CSOs operating in Cambodia. It focuses on human right abuses and is relatively outspoken about the flaws in the system that allow human rights violations, including corruption and impunity. It documents human right abuses and publishes reports on its website (LICADHO 2016).

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