

UNDEF



The United Nations
Democracy Fund

**PROVISION FOR POST PROJECT EVALUATIONS FOR THE UNITED NATIONS
DEMOCRACY FUND
Contract NO.PD:C0110/10**

EVALUATION REPORT



UDF-CMB-10-381 - People's Access to Public Information (Cambodia)

20 May 2014

Acknowledgements

The evaluators would like to thank everyone who took the time to provide their expertise and insight on the issue of access to information in Cambodia, and on the implementation of the project *People's Access to Public Information*. In particular, the Advocacy and Policy Institute and its commune level participants for their support to the evaluation team during the field work.

All errors and omissions remain the responsibility of the authors.

Disclaimer

The views expressed in this report are those of the evaluators. They do not represent those of UNDEF or of any of the institutions referred to in the report.

Authors

This report was written by Sue Nelson, Aurélie Ferreira, and Prasnar Yi. Landis McKellar, the Evaluation Team Leader, provided editorial and methodological advice and quality assurance. Ms. Aurélie Ferreira was Evaluation Manager and Mr. Eric Tourres Project Director at Transtec.

Table of Contents

I.	EXECUTIVE SUMMARY.....	1
II.	INTRODUCTION AND DEVELOPMENT CONTEXT.....	4
	(i) The project and evaluation objectives	4
II.	PROJECT STRATEGY	7
	(i) Project approach and strategy	7
	(ii) Logical framework.....	9
III.	EVALUATION FINDINGS	11
	(i) Relevance	11
	(ii) Effectiveness	12
	(iii) Efficiency	15
	(iv) Impact	16
	(v) Sustainability	18
	(v) UNDEF Value Added.....	19
IV.	CONCLUSIONS	20
IV.	RECOMMENDATIONS	21
V.	OVERALL ASSESSMENT AND CLOSING THOUGHTS.....	23
VIII.	ANNEXES	24
	ANNEX 1: EVALUATION QUESTIONS:.....	24
	ANNEX 2: DOCUMENTS REVIEWED:	25
	ANNEX 3: PERSONS INTERVIEWED	27
	ANNEX 4 : ACRONYMS	30

I. Executive Summary

(i) Project Data

The *People's Access to Public Information* project sought to improve citizen access to public information and the response of local authorities to the needs of local communities in Cambodia. Its intended outcomes were: 1) enhanced capacity of local councils and community-based organizations (CBOs) to promote access to information to best serve the needs of the people; 2) increased awareness among local communities on access to information; 3) access to information integrated into community council's administration and plans; and 4) increased public dialogue on access to information to support adoption of an access to information law.

This was a two-year USD 200,000 project (1 November 2011 - 31 October 2013). It was implemented by the Advocacy and Policy Institute (API), a Cambodian Non-Governmental Organization (NGO) based in Phnom Penh. The project had USD 35,000 in co-funding provided by DanChurch Aid. Its main intended activities were to:

- Train and build the capacity of local councils for access to information, including providing tools for information collection, management and disclosure;
- Raise awareness on access to information through community forums, citizen feedback mechanism, media campaigns and small grants for CBOs to organize village outreach information and activities.
- Undertake a legal assessment, provide technical input and advocate for a national legal framework on access to information.

(ii) Evaluation Findings

The project objectives were directly **relevant** to the needs to strengthen the transparency and accountability of government in Cambodia. Cambodia has no freedom of information law or policy, and although there are regulations about posting prices for public services, these are only partially observed. API had a clear strategy about how to address these problems by working at the national level for legislation, and at local levels to strengthen the local authorities' capacity to manage public information and disseminate information about the people's right to public information. This strategy increased the relevance of the project for the communes, as did its efforts to customize its materials to the situation in each commune assisted. However, the lack of follow-up for the demand side of the process limited the relevance of the project for villagers.

Project implementation delivered most of its anticipated outputs, although there is still no access to information policy or legislation. This is now under discussion, though a draft law was first presented back in the early 2000s, by the ruling party as this is one of the demands of the opposition which has been boycotting the National Assembly. At the commune level the project exceeded its anticipated outputs. API used a soft approach to its work, which ensured the participation for local officials and access to policy makers at the national level, however, this resulted in a lack of emphasis and **effectiveness** on the citizen demand side as the project predominately targeted officials. The effectiveness of the activities was also limited by the complacency of the population in their situation, and the limited reach and follow up for the grass roots activities.

The project inputs were consistent with the delivery of the activities but not with the intended outcomes. That would have required more follow-up for the commune-level activities. API

appeared to have managed the project **efficiently**. It delivered complete and timely reporting to UNDEF and undertook baseline and end of project reflections reports, from which it pulled lessons learned to improve its next project. API had a decentralized manner of implementing the project. It used a volunteer in each of the six communes that it provided a small monthly stipend for expenses to follow up on the project with the commune. However, API's supervision of the volunteers and their ability to do more than logistical work seemed limited.

The **impact** of this project is difficult to assess. Although it did have baseline and end of project data, the methodologies and questions were different which resulted in an end report that reflected the respondents' perceptions more than a comparison of actual improvement over baseline. Anecdotal information on achievements was also extremely limited. The evaluation team itself saw very little difference between project and non-project villages on issues of posting information and holding public forums to share information as these were made mandatory by the government as part of the decentralization process. However, it is likely that, to a limited extent, the counselors in the assisted villages are more aware of access to information issues and more likely to continue to provide information in the future than are non-assisted rural communes. Commune officials also felt the project had helped reduced tensions with villagers as they thought that villagers now understood the officials' role better. There are perhaps also individual cases of personal empowerment from something heard or learned during the forums. However, at the same time, the team found an increasing sense of frustration among those who did try to use the new mechanisms, such as the village level suggestion box furnished by the project, but who got no response. At the national level, there is still no law or public policy on access to information.

Although API found extremely high levels of satisfaction with the project among forum participants it polled (95 percent), there was no ownership for it visible at the local levels. Since public information remains such a sensitive issue, perhaps it is unrealistic to think the commune officials or CBOs would take it over. Posters were still up on the houses where they were placed. One can argue residents may be afraid to take down posters put up by officials, but they are still there for people to read. The prices are no longer accurate as they were raised after the posters were printed and there was no mechanism or systems developed for their updating. In almost all of the communes visited-- project and non-project-- the officials had already posted the new prices themselves as this was the requirement of the Ministry of Interior. There were **sustainability** issues with the village boxes which were managed by API rather than the commune councils. Although API said it did a wrap up end-of-project meeting that including telling the officials that the district officials would now take care of the boxes, there was no evidence of this in the discussions held by the team with commune officials. One commune still believed the project was ongoing and wanted API to change the volunteer who they said had not been active in a year.

There was **value added** by UNDEF. UNDEF's two year grant timeframe gave API the time to do a project that could train local officials before having to start the activities with the villagers, and to continue its work at the national level to advocate for an access to information law. The substantial nature of the UNDEF grant also gave API the experience to manage a larger program and to leverage it into an even larger scale project with European Union (EU) funding. The UN branding also gave enhanced credibility of the efforts, especially with national level officials.

(iii) Conclusions

The **project's purpose was important and is still needed** in the Cambodian context. A freedom of information framework is an important element in the democratization process and this is still missing. The project also **fit the grantee's vision and previous experience**

as API has been working on access to information issues for years. API was also one of many organizations working on this topic at the national level and coordinated closely with these efforts to avoid duplication and to help ensure a unified approach. API used **a soft approach which gained it access** to local officials and policy makers to work on this sensitive sector, but which limited its willingness to increase citizen demand and to follow up on some of the tough issues raised by villagers.

The **performance of the project would have been stronger with more follow-up** of its activities and a more robust role for the volunteers. This could have also been provided through programmatic links to other projects and/or participating CBOs. The project **lacked adequate staffing** to fully implement the meaning of the project. There were only two full time staff and it was unrealistic to expect part time volunteers to carry the load of the project at local levels. **Local authorities needed to be integrated into the collection and handling of village level complaint systems** instead of having this managed by a project. This project **might have had more significant results** than was visible to the evaluators, but this is unknown as **it did not use the same performance measuring tools developed for the baseline at the end of the project**. However, the grantee did make a good effort to collect data to measure performance and reported fully on its outputs.

(iv) Recommendations

For similar projects in the future, the evaluators recommend that the grantee **determine if the main target is to strengthen official capacity** to implement Ministry guidelines for access to information **or to build citizen demand for increased access to information**. If it is both, API should either step up its efforts with citizens or partner with another organization that can help villagers with their complaints and demands with their local and national government. API should also ensure **more follow up of citizen complaints to authorities** through API mentoring and advocacy with local authorities and/or by linking with a legal aid or other program with the expertise needed for some of the specific issues raised by villagers, such as land tenure. This would need to be incorporated into the existing complaint and monitoring system at commune, district and provincial levels. **Integrate local authorities into the village-level complaint process** by giving them the responsibility to collect and respond to the letters placed in the village boxes.

Ensure adequate staffing for the project to ensure there are sufficient follow up for activities and enough supervision for volunteers. **Use the same indicators measured for the baseline for the end survey** so that project performance can be more accurately measured. Non-project assisted villages should be included in the survey to control for external factors, such as changed Ministry of Information regulations. **NGOs and international agencies should continue their work for access to information** legislation as this is a fundamental element of the democratization process and a prerequisite for citizens to be able to participate knowingly in the electoral and political process, and to be able to hold their officials accountable for their actions.

II. Introduction and development context

(i) The project and evaluation objectives

The *People's Access to Public Information (PAPI)* project in Cambodia (UDF-CMB-10-381) was a two-year USD 200,000 project implemented by API. USD 25,000 of this was retained by UNDEF for monitoring and evaluation purposes. There was also USD 35,000 in co-funding provided by DanChurch Aid, a Danish NGO. The project ran from 1 November 2011 to 31 October 2013. Its main objectives were to improve citizen access to public information to achieve social accountability and transparency; strengthen commune level administration and management procedures; and, strengthen local authorities' response to the needs of their communities. It intended to do this through: 1) training and capacity building of local councils and CBOs to promote access to information to best serve the interests of the people; 2) awareness building on access to information among local communities; 3) integrating access to information into the commune council's administration and plans; and, 4) increasing public dialogue on access to information to support passage of an access to information law.

The evaluation of this project is part of the larger evaluation of the Rounds 2, 3 and 4 UNDEF-funded projects. Its purpose is to "contribute towards a better understanding of what constitutes a successful project which will in turn help UNDEF to develop future project strategies. Evaluations are also to assist stakeholders to determine whether projects have been implemented in accordance with the project document and whether anticipated project outputs have been achieved".¹

(ii) Evaluation methodology

The evaluation took place in March 2014 with field work done in Cambodia from 3 - 15 March, 2014. This field time was shared with the evaluation of another UNDEF project (UDF-CMB-09-319) that also worked to support the democratization process in Cambodia. Some of the interviews were arranged to cover questions for both projects, such as with the United Nations Development Programme (UNDP) and Members of Parliament (MPs). The evaluation was conducted by Sue Nelson, Aurélie Ferreira and Prasnar Yi, experts in democratic governance. The UNDEF evaluations are more qualitative in nature and follow a standard set of evaluation questions that focus on the project's relevance, effectiveness, efficiency, impact, sustainability and any value added from UNDEF-funding (Annex 1). This report follows that structure. The evaluators reviewed available documentation on the project and on the issue of access to information in Cambodia (Annex 2).

In Cambodia, the team met with API, the co-funder DanChurch Aid, the Ministry of Information and MPs working on access to information issues. The team also visited two API assisted communes. One of these had been carried over from a pilot project funded by DANIDA (Tuol Ampel) and the other was a new commune added for this project (Svay Rompea). Both were in Kampong Speu province. The team also visited Chrouy Chanvar Commune in Phnom Penh province for comparison purposes. It also took advantage of the field visit in Siem Reap province for the other UNDEF-funded project to ask similar questions in Bakomg Commune. In these locations the team spoke to elected commune officials, commune clerks, village leaders, teachers and health officials. It also spoke to ordinary villagers and shop keepers selected randomly. The team also met with the United Nations

¹ Operational Manual for the UNDEF-funded project evaluations, p. 6.

Development Programme (UNDP) and the experts who did the baseline survey and final reflections report for the project. The list of persons interviewed is provided in Annex 3.

During the preparatory work, the evaluators identified several issues which they followed up on during their interviews. These included:

- **Differences between targeted communes and other communes** to see if there was an increased demand for, and supply of, information in assisted communities;
- **Extent of results and attribution** for them since there appeared to be a large number of NGOs and other actors working on issues of access to information;
- **Implementation** of project activities to see how API avoided some of the problems that would have been expected in executing a project of this nature within the developmental and political context of Cambodia; and,
- **Replication of results and sustainability issues** as the project reached a modest number of persons in six communities and to see if any of the participants targeted acted as a multiplier.

In addition, the team assessed the issues raised by UNDEF:

- **Grantee's approach** to commune officials which was perceived as positive, supporting and encouraging and was felt to be a factor in API exceeding its anticipated outputs; and,
- **Comparison of API's work** with the other UNDEF grantee in Cambodia (UDF-CMB-09-319) and the lessons learned from the API project that could be useful for other grantees in similar circumstances.

(iii) Development context

Freedom of information is defined as the right to access information held by public bodies and is an integral part of the fundamental right of freedom of expression enshrined in Article 19 of the Universal Declaration of Human Rights. This is also included in many other international instruments including the International Covenant on Civil and Political Rights. Freedom of Information legislation reflects the basic principle that all information held by governments is public information and may only be withheld for legitimate reasons such as individual privacy or national security. Over 90 such laws have now been adopted worldwide, compared to only 13 countries that had this type of legislation in 1990².

Access to information on what the government is doing allows the citizens to ensure it is representing the will of the people, is accountable for its actions, and allows them to express an informed opinion and vote. According to the United Nations Educational, Scientific and Cultural Organization (UNESCO), “universal access to information and knowledge is fundamental to the development of inclusive knowledgeable societies.”

In Cambodia, access to information has been problematic since it started multi-party elections in 1993. Cambodia had no history of freedom of information and its patriarchal tradition means that Cambodians are reluctant to ask for information, or do not see their role as asking questions or interfering with the functions of government. At the same time, the government and public officials have been reticent to share information with the press or the public. Although this attitude is changing, it is a slow process and Cambodia still has no specific freedom of information policy or legislation.³

² UNESCO, Freedom of Information

³ CCHR, *Freedom of Information in Cambodia*, p 2

There are some laws that do guarantee some rights for information or contain relevant clauses. The Constitution protects the right of freedom of expression which is considered as a precursor to the guarantee of the freedom of expression. The 1995 Press Law recognizes the right of the press to “access information in government held records.” It stipulates that a request can be made in writing, specifying the information sought and officials are to reply within 30 days. It also provides grounds for denial of requests, such as if it endangers national security or interferes with the privacy of individuals.⁴

In Cambodia, the government started a policy of deconcentration and decentralization in 2001 which was intended to delegate authority and decision making power down to local authorities and increase the participation of the citizens through commune elections. Elections for commune councils were held in 2002, 2007 and 2012. The *Law on Administration and Management of Commune/Sangak* provides for some public information disclosure at the local levels, with commune council meetings to be conducted in public and for the councils to disseminate public information, such as their reports and meeting agendas.⁵ The Ministry of Interior also issued regulations in 2008 requiring public posting of prices for services and setting up of commune level “suggestion” boxes for public use.

The government pledged in 2004 to have a freedom of information framework in place by 2006 which did not occur. In 2007, the Council of Ministers mandated the Ministry of National Assembly, Senate Relations and Inspection to produce a draft policy paper that would then be used to draft a freedom of information law. The draft policy was finished in 2007 but was never formally adopted by the government.⁶

Civil society, international organizations and donors all promoted the concept of freedom of information in Cambodia. In December 2010, API organized a workshop on access to information with the international NGO Article 19 which had good government and Assembly participation. Also in December 2010, the Sam Rainsy Party submitted a *Draft Law on Access to Information to the National Assembly* which was ultimately rejected. An amended version of this draft law was sent to the Assembly in March 2012 but was also rejected. According to the Cambodian People’s Party (CPP), it was because the draft included provisions which they thought were unconstitutional and therefore not acceptable, such as the creation of a new oversight body that included international participation.⁷

Cambodia held elections for the National Assembly in July 2013. These elections were widely considered as one of the most competitive elections to date. They marked the return of the opposition leader, Sam Rainsy, who had been in self-imposed exile after a conviction for disinformation, and who was pardoned by the King. Although there was less elections-related violence, there were still issues of political intimidation and extremist rhetoric by political leaders. The CPP won the majority of seats in the national assembly (68), but the Cambodian National Rescue Party (CNRP) made a good showing with 55 seats. The CNRP rejected the results of the elections claiming electoral fraud, and boycotted the National Assembly. They have been negotiating with the CPP since on issues of reform, which include the issue of access to information.

At the end of 2013, the government tasked the Ministry of Information to develop a policy framework for access to information. According to the Ministry, once this is done, they will create a committee to draft the law which they anticipate will be done within the next three years.⁸

⁴ Ibid, 9

⁵ Ibid, p 10

⁶ Ibid, p 12

⁷ Evaluation interviews

⁸ Evaluation interviews

III. Project strategy

(i) Project approach and strategy

With this project, API intended to address the problems of social accountability, transparency and the responsiveness of local authorities to the needs of local communities in Cambodia. Although Cambodia had started the decentralization process with the commune elections in 2002, these officials lacked an adequate understanding of their roles and responsibilities and ability to respond to community needs. API felt that it could strengthen citizen access to information and demand for accountability by strengthening the commune officials' capacity to manage public information. This would increase official responsiveness to citizen demands and improve relations with their communities. API identified three areas for improvements in these areas which it intended to address in this project. These were:

- **Lack of a legal framework for access to public information.** Without an access to information law, citizens are unable to demand their rights since Cambodia does not have a culture or history of sharing government information with the public.
- **Lack of awareness and understanding** of local authorities on the obligations of government to routinely make information available to the public.
- **Lack of capacity of local officials and civil society** to disclose public information within their communities. For example, this leaves citizens without knowledge of official prices for public documents, such as birth certificates, and corrupt officials free to charge more.

By addressing these areas, API expected the project would increase citizen demands and governmental responsiveness to those demands. This in turn would strengthen social accountability and transparency in governance. API intended to undertake activities within each of these three areas to enhance the capacity of the institutions of governance and strengthen civil society's ability to participate effectively in these processes.

The intended outcomes for this project were:

- Enhanced capacity of local councils and CBOs to promote access to information to best serve the interests of the people;
- Increased awareness among local communities on access to information;
- Integration of access of information into local councils' administration and plans; and, Increased public dialogue on access to information to support the passage of an access to information law.

API expected to achieve these objectives by:

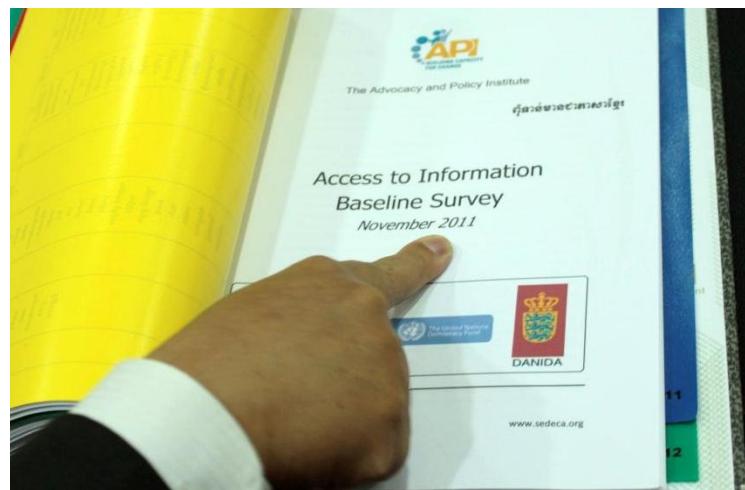
- **Strengthening the capacity of local councils and CBOs to promote access to information to best serve the people** by conducting a baseline and training needs assessment in six rural communes, developing and delivering a training program on access to information and its management to these commune and district councils, and by providing technical assistance (TA) to them as needed. This was intended to benefit the commune/district officials, CBOs and citizens within those six communes. These areas were selected by their accessibility, multi-party nature of the council and level of poverty. Three were communes where API had implemented a two-year pilot project and three were new communes added for this project.
- **Increasing awareness about access to information among local communities.** API intended to develop information and educational materials (booklets, posters etc),

hold information dissemination campaigns in schools and villages, and organize a media campaign through radio, television, newspapers and talk shows on access to information in a democratic society. API also intended to produce documentation on the importance of access to information to ensure transparency in reporting on the Cambodian MDGs, governance and national resource management and organize public community forums and educational materials.

- **Integrating access to information within the target council's administration and plans.** API intended to provide equipment such as filing cabinets to improve information management, create mechanisms/tools to collect information, develop a citizen feedback mechanism, and provide technical assistance and coaching of the commune and district delivery systems, and integrate access to information in their annual communal investment plans. It also intended to support CBOs to actively engage with local communities and to participate in monthly meetings.
- **Increasing public dialogue and support for passage of an access to information law.** API intended to do a comparative regional review on successful CSO engagement in the promotion of access to information (funded by DanChurch Aid), and contribute with CSOs and donors to advocate for a legal framework for access to information. It also intended to support the drafting of this law by providing technical support, lobbying the legislature, ministries and organizing three multi-stakeholder workshops with relevant ministries politicians, civil society and donors.

The main project assumptions for these activities were that the enabling environment for NGOs in the human rights and good governance sector would not deteriorate; that local authorities would be receptive to their activities and committed to information disclosure; and, that the assisted communities would then be more aware of and thus increase their demand for rights to access information and for disclosure of public information.

API also identified some risks for the project. These included possible restrictions on NGO activities in the governance and human rights sector through a new NGO law or other instrument; and, delays or restrictions stemming from the elections anticipated for the senate in January 2012, commune councils in April 2012, and national elections in 2013. Other risks included a continuation of the culture of nondisclosure and that the new development plans would give limited priority to social development including information disclosure.



Checking API advocacy materials with an MP – National Assembly – March 2014

API intended to mitigate these risks by building the capacity and ability of local officials to understand and implement their roles and responsibilities as stated in the *Law on the Administration Management of Commune/Sangkat*. It also intended to work with other NGO networks and coalitions to ensure collective action; take advantage of the elections to raise critical issues with the political parties for inclusion of access to information in their campaign

platforms; and ensure that project activities did not conflict with the electoral calendar. It also intended to do Memorandums of Understanding with their partners and local councils that clearly specified the roles and responsibilities of each and directly involve CBOs to ensure that they were integrated in the project.

This project was built upon a 2008 - 2010 pilot project on commune information disclosure funded by DANIDA. API took its lessons learned to develop this UNDEF-funded project that expanded activities to three additional communes and added in the national level activities to address the lack of a legal framework for access to information legal framework. The six communes assisted were: Kork Balang (from pilot), Talom (new) in Mongkol District, Banteay Meanchey province; Sethel (from pilot) and Thlork Vean (new) in Samaki Meanchey District in Kampong Chhnang province; and Svay Rompea (from pilot) and Tuol Ampel (new) in Bosrzedh District, Kampong Speu (Figure 1).

API intended to ensure sustainability by building local capacity and systems on access to information (A2I) so the councils could continue to provide public information beyond the end of the project. Integrating access to information into the commune investment plans would further ensure the sustainability of project objectives. Strengthening the capacity of CBOs participating in the project and raising the awareness in targeted communities would ensure that local authorities continued to be held responsible for improving public access to information. Assistance and advocacy on the national legislation would help to ensure the permanence for access to public information at all levels. API intended to ensure gender was addressed in the project by having at least 40 percent of the participants in its training workshops be women, and by finding joint activities with some of its NGO partners who focus on women's issues.

(ii) Logical framework

Project activities	Intended outcomes	Medium-term impacts	Long-term development objective
Capacity building of local councils and CBOs to promote access to information			
<ul style="list-style-type: none"> • Training needs assessment • Baseline survey • Develop and deliver 7 trainings • Follow-up and coaching of commune and district councils 	<ul style="list-style-type: none"> • Strengthened capacity of local councils for information management and on access to information issue 	<ul style="list-style-type: none"> • Increased public information available for citizens • Increased demand for more responsive services 	<ul style="list-style-type: none"> • Increased transparency and more accountable and responsive local governance
Increasing awareness on access to information			
<ul style="list-style-type: none"> • Develop/disseminate IEC materials in 3 new communes • 22 outreach activities on A2I in 6 communes • Media spots and documentary on importance of A2I • 12 community forums with 720 people 	<ul style="list-style-type: none"> • Increased awareness in targeted communes and nationwide on importance of access to information 	<ul style="list-style-type: none"> • Increased demand for access to information • Increased demand for social accountability 	<ul style="list-style-type: none"> • Increased transparency and more accountable and responsive governance

Integrating access to information into councils' administration and plans

<ul style="list-style-type: none"> • Commodities for communes for information management • Create mechanisms for information management and citizen feedback forms • Support/mentor CBO participation in council meetings • TA and mentoring for commune councils 	<ul style="list-style-type: none"> • Improved management of public information at commune council level • Strengthened ability for citizens to provide feedback to councils anonymously • Strengthened participation of CBOs in local governance issues • Strengthened response of public officials to citizen demands 	<p>Increased access to public information for citizens</p> <p>More responsive local government</p> <p>Improved relations between local officials and civil society</p>	<p>Increased transparency and more accountable and responsive local governance</p>
---	--	--	--

Supporting adoption of access to information law

<ul style="list-style-type: none"> • Regional review on access to information and CSO engagement in process • 2 multi-stakeholder workshops on A2I legal framework • TA for drafting A2I legislation with others • Lobbying for A2I legislation 2times/year 	<ul style="list-style-type: none"> • Better stakeholder understanding of best practices in region on A2I • Strengthened advocacy on A2I legislation • Improved A2I legislation 	<p>Adoption of an access to information law in Cambodia</p>	<p>Increased transparency and more accountable and responsive government</p>
---	---	---	--

IV. Evaluation findings

(i) Relevance

The project was directly relevant to API's mandate. API had been an advocacy and policy project started by Pact Cambodia in 2003 and continued this after it became an independent NGO in 2007. The project activities fit into API's institutional vision which is to empower people to interact with their government to protect their rights and provide for their needs⁹. API demonstrated significant intellectual capacity for the topic of access to information which is reflected in the numerous studies and strategies developed with project funding.¹⁰ It also leads the Access to Information Law Campaign Working Group comprised of about 30 NGOs.

API sees information as the foundation for confident citizen participation and to hold government accountable. API planned activities to support both the demand and supply sides of public information. For the supply side, it worked at the national level to advocate for a legal framework for access to information, and at the commune level by working with commune officials to strengthen their capacity to manage information and to respond to public demands. It also intended to work on the demand side by increasing citizen awareness and demand for public information.

The activities themselves were relevant to the objectives of the project and in line with the need to increase the transparency of government and to allow for public scrutiny of its policies and decisions. The Ministry of Interior did issue regulations in 2008 that requires the public posting of fees for public services and documents by government and ministries, but the application of these regulations is uneven and there is no overarching freedom of information policy or legislation. There was also a clear need for civic information and education among the rural villagers, especially for the older generation that had limited educational opportunities because of the war and Khmer Rouge.

API tried to increase the relevance of its materials by adapting the content of its booklets to each commune. In addition to listing the fees for basic services, it mapped the communes and provided the names and phone numbers for commune officials, police, public services, and pertinent information such as population and economic data. The booklets were also stamped on each page by the relevant commune officials which demonstrated to the user that the information was

Figure 1: Location of project activities



Source: www.vidiani.com

“One frequent problem we faced was that the poorest people would stay in the field; working and cultivating the land. Only 70% of the families attended the dissemination meeting we organized. Among the 30% missing were the poorest.”

Councillor in Toul - Ampol

⁹ API, *The Organisation's Vision, Mission, Goal*

¹⁰ Including *Access to Information in Cambodia, Past Reflections, Future Directions*(2012), *Strategy for Promoting Passage of Access to Information Law* (2013) and *Assessing the Quality of Election Information* (2013)

official. This increased the value for these booklets for everyone from citizens, who had not had access before to such basic information as the councilors' or police phone numbers, to the local officials and NGOs working in the area who used the data.

However, outside of the activities directed at the commune officials, most of the activities were designed as once or twice a year efforts that involved a limited number of villagers and almost no follow up with them afterwards. This limited the relevance of the project for the villagers to having the contact list for local officials, and the prices for some public services, but it did not help them with other pressing needs, such as who to contact for information for land issues. Land was an issue raised by the villagers interviewed in all of the communes visited and far surpassed the need for a communal contact number as they all knew where to find their local officials if needed. If this project had expanded the range of information provided in its booklets to include contact information for issues beyond the control of local officials, such as land or other issues raised by forum participants (such as violence prevention and illegal gambling), this would have significantly increased its relevance for villagers.

(ii) Effectiveness

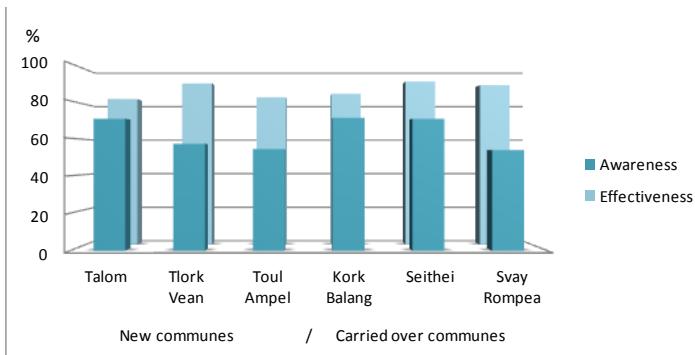
API delivered most of the anticipated outputs and exceeded its targets in some cases according to its reporting. The effectiveness of the activities and the extent to which they contributed towards achieving the intended project outcomes is not clear, especially at the grass roots level. At the national level, there was very little political will from the ruling party for an access to information law, and analysts thought it was strategic for a project to work on the issue at the grass roots level so that the people would know they had these rights to information.

At that local level, API undertook a baseline study that gave a good picture of the communities at the start of the project, and a training needs survey that provided an excellent baseline for the level of knowledge for local officials and CBOs at the start of the project. It also undertook a project reflections report that looked at the end state of the communities. That study reported on the levels of awareness of villagers on access to information and on the perceptions of local authorities on the effectiveness of the project,

(Figure 2) but it did not compare these findings against the baseline or training study which would have provided a better idea of the actual effectiveness and impact of this project.

The reflection report did note however, a positive feedback for the project among commune officials, averaging 88 percent. This did not vary significantly between officials in the newly assisted communes and the ones that were carried over from the pilot project. Villager knowledge on access to information was lower, ranging from 53.75 percent in the carried-over commune of Svay Rompea to 93 percent in the also carried-over commune of Seithei. There was little difference between the levels of the old and new communes assisted in Kampong Speu and Banteay Meanchey, but there was a higher level of knowledge noted in

Figure 2: Level of villager awareness and local official perception of effectiveness of project



the carried-over commune in Kampong Chhang. They had an awareness level of 70.41 percent compared to 57.07 percent in the newly assisted-commune.

These findings are largely consistent with the evaluators' findings for the two communes visited in Kampong Speu. In both communes, the local officials liked the project and asked for its continuation, but the level of knowledge about the project and the use of its products among villagers were extremely low. The project developed large posters with the prices for public services printed on it that it disseminated through different means in the six communes. In some cases it used its project volunteer to hand them out or tack them up in people's houses. In other cases, this was done by village chiefs or commune officials and their friends. There were not enough posters for everyone and there did not seem to be a strategy for how these posters were distributed. Youth did not appear to be involved in the commune-level activities to any great extent even though they make up more than two-thirds of Cambodia's population.

In Toul Ampel, which was the only commune where the team saw the posters on people's homes, the people living in and around the houses knew what they said, but demonstrated no ownership for them. They were something that the officials had put up and so were still there. People away from these houses had not seen the posters or knew of API. If these posters had been placed instead in public buildings or on the outside of busy areas such as a transport center or market, perhaps more could have seen them. The posters were seen as useful by local NGOs, which the counselors said would give ten pens per poster.

The distribution methods for the pamphlets also seemed to be non-specific. According to the officials in Toul Ampel, about 70 percent of the families came when the brochures were distributed, and they had the intention of distributing them to the rest. However, they also noted that villagers did not have the time to read brochures even though they needed the information, as they were "busy" and were out in the fields earning a living.

Many of the people interviewed who had not participated in the project did know the prices for things such as birth certificate and where and when to go for them. They also knew how to contact the village leader and police by going to their offices or homes. However, the local officials and villagers who had the brochure thought the phone numbers were useful and most of the commune officials themselves reported receiving an increased number of calls.

API also provided 50 "information boxes" for all villages within the six assisted communes.

"What is written in the book is not reality. The person next door is taking my land, I don't know what to do or where to go about it. I used the box two-three times, but I got nothing back and the situation is unchanged."

"I used the complaint box, big trucks are destroying our road. But there was no answer".

Villagers, Toul Ampel



API banner on local public services, prices and contacts, 2012

These boxes already existed at the commune level as required by the Ministry of Interior and called “suggestion boxes” and were used to collect suggestions and complaints about issues citizens thought the local officials should address, such as roads needing repairs or illegal land seizures. API said the commune officials asked them to install suggestion boxes for their villages. This would seem to be an effective way to increase social accountability and build the capacity of commune officials to respond to citizen requests. However, these boxes were managed by the project instead of the local officials, and the team found little ownership for the boxes or their content during its interviews. API kept statistics on the number of letters collected (757) and whether they came through the box or were given directly to their volunteer, but not on their resolution. This they said was the responsibility of the officials.

Several of the villagers interviewed said they had put questions and suggestions into the box, but stopped using it after they never heard back. Commune officials’ performance for their own boxes was also uncertain. In one location, the officials told the team no one left letters in their box, while students at a nearby school said they had seen people put letters into the box. There were obvious doubts and questioning from people; either on their confidentiality or effectiveness. One official stressed that API involvement in the management of these boxes sent a reassuring signal to people.



Officials showing government banner with public services prices as distributed early in 2014 - Chrouy Chanvar (non assisted commune)

At the same time, API said they cautioned their volunteers not to incite people to make more complaints as if hundreds of complaints came in, the councils could not address them. To some extent, the volunteer could not handle them either. They also said they told their volunteers “not to talk to too many people”-- just to do the logistics and monitor the performance of the community council for API’s internal information and mentoring activities. This may explain why the training did not include sessions on conflict resolutions or litigation which it had done under the pilot project; and in fact did not separate officials; CBO and volunteers, but had them trained all together.

This limited the volunteer’s role at the council’s regular monthly meetings with district officials-- where they could raise these types of issues with higher authorities-- to providing refreshments and paying their transport. The project also kept the information provided to citizens to contact numbers and right to information and did not discuss their duties, such as paying taxes to pay for these services, as many of those interviewed thought public services should be free.

This restricted role and lack of substantive follow up limited the effectiveness of the project and its potential impact on increasing the social accountability of the councils and providing citizens with an effective means to channel issues to their local authorities. Local CBOs participated in the project but primarily by being invited to the village forums organized by the project, rather than participating as implementers or multipliers.

The number of villagers included in the public forums was also limited. Although one

communal council said they had between 100 and 400 people attend their forums, API said it wanted to keep most forums to about 60 - 80 people so that they could have an opportunity to talk. These forums were by invitation only so were not open for the general public. API did do a questionnaire for its forums' participants and analyzed the data for about 600 respondents. According to this, most of the forum participants were men (61 percent) and older, with less than 10 percent of them under 25 years old. There was a very high level of satisfaction noted by respondents of around 95 percent. It should be noted that the organization of regular forums is part of the government decentralization process and is now mandatory at the local levels.

At the national level, API undertook or attended a number of workshops on access to information in coordination with the others working in the sector, most notably done by UNDP, UNESCO and Article 19. In May 2013, most democratization activities were suspended in the lead up to the elections as most government counterparts were campaigning. API took advantage of the elections to hold an event in June 2013 where it got the ruling and two opposition parties to agree to a campaign pledge that if elected, they would adopt an access to information law. This may prove to be effective in the long run. Those elections were contested by the opposition party which has refused so far to take their seats in the National Assembly. API also met with the opposition in October 2013 to advocate for access to information to be part of its negotiations with the ruling party. At the time of the evaluation, the CPP was making some concessions in an effort to get the opposition MPs to take their seats. This included having tasked the Ministry of Information to develop a policy for access to information and to draft a bill for Assembly consideration. API then lobbied the Ministry to be a member of the working group for this effort.

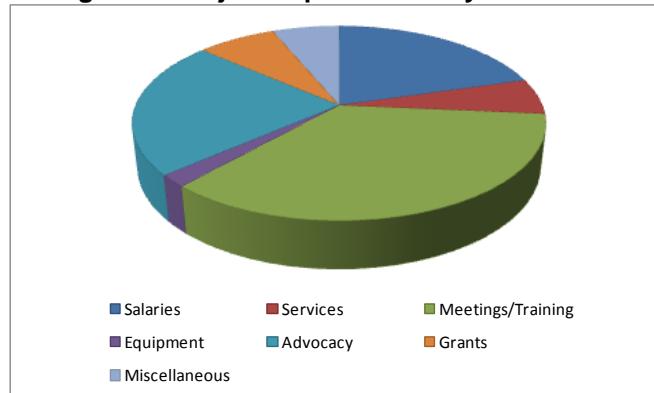
(iii) Efficiency

The project inputs were consistent with the delivery of its outputs, but not with the project's intended outcomes. To achieve these, more follow-up efforts would have been needed in the communes and at the national level. API had substantial levels of experience in the area of access to information and seems to have cultivated a good relationship with the local authorities and national officials who enabled it to implement its activities and to get endorsement for the content of the materials disseminated. The fact that API is a leading member of the international coalition for access to information also ensured that it worked within the existing efforts for freedom of information and not in duplication or in parallel with it.

API also built this project on the lessons learned of an earlier project. It adopted very practical selection criteria for villages. This included having a physical commune office, multiparty location, existing CBOs, low levels of income, and easy accessibility. API relied on 'volunteers,' one per commune, who were paid USD 75 a month to do the local level work and to cover travel expenses for meetings and other local expenses.

This was efficient as it decentralized project administration but the ability for a lone volunteer to implement any activity that might go against the vested interests of local officials is

Figure 4: Project Expenditures by Line Items



doubtful. Even though CBOs were invited to the trainings, they were not included as part of project implementation. If they had, this might have helped to increase the project's reach and effectiveness as well as contributed to more sustainable outcomes. API itself did not provide the follow up needed to turn its activities into a more synergistic program which would have increased its effectiveness and impact. Much of this was conceptual, but another part was the limited number of staff funded under the project. It also relied heavily on the volunteers and their monthly report and seemed to have undertaken limited performance monitoring of them. It was also a budget allocation issue, as less than USD 2,000 was allocated and spent for API follow up and coaching of commune and district councils.

The amount spent to develop the community pamphlets (USD 4,350 or two percent of the project budget) was an efficient use of resources. The need for a large poster to place in persons' homes is, however, debatable. Although it was only five percent of the budget, other options could have been to make small plasticized cards that could have been mass produced and more widely distributed. API produced a number of radio programs on the right to know and access to information that included dramas, spots and talk shows with invited speakers from the working group. API used an NGO radio managed by the Cambodian Center for Independent Media (CCIM), which also worked on freedom of information issues, to organize these elements. This only used five percent of the budget but provided the project with a broader reach than it could get from working in six communes. CCIM has a potential listener pool of 8.5 million people in 14 provinces, but API did not commission market information that could have indicated how many persons heard the messages and programs.

API, as an NGO that evolved from an internationally managed project, had very good reporting systems in place. It had developed forms for citizen complaints, had sign in sheets for meetings, required monthly reporting from its volunteers and kept notes of its meetings and project activities. It analyzed the results of its feedback forms from public forums and the suggestion boxes. It commissioned a baseline, training and end of project studies and had already pulled the lessons learned from this project to design and find European Union funding for a larger follow-on project targeted at access to information at the district levels. Its narrative and financial reporting to UNDEF was timely and complete.

(iv) Impact

The impact of this project is hard to assess. As noted, for the commune level activities, API had good baseline data and contracted a final reflections report but the same questions were not repeated as API developed a different terms of reference for that report. As a result, the final report is more of a self-assessment of those interviewed than a reflection of actual change over baseline data. There also was very little movement on the adoption of an access to information policy or legislation at the national level although the opposition party had submitted its own version of an access to information law in the last Assembly and the government recently tasked the Ministry of Information to develop a policy and law in the face of the opposition party boycott of Parliament. API chose to work with the government despite the contested election results, and some of the other human rights NGOs expressed the opinion that API, and the working group on information, should have issued a press release demanding the release of information on the electoral situation and not legitimize the government by working with it until the electoral dispute and the opposition boycott of the National Assembly were resolved.

API used a very soft approach to its work which affected its impact. It referred to its efforts as "access" to information, rather than "freedom" of information as "freedom" could be perceived as threatening or as opposition. It also started working with the commune councils to

strengthen their capacity to handle information before starting to raise village awareness about access to information. This approach allowed them to work with local authorities and have ruling party officials participate in its workshops, which might not have been possible otherwise. This also helped the local authorities meet Ministry of Interior guidelines for the posting of the fees for public services and improved their ability to handle citizen complaints. However, at the same time, in a context where after 15 years of discussion the government has not yet adopted an access to information policy or legislation, a soft approach may gain access, but it has not yet resulted in structural changes.

At the commune level, the evaluators themselves noted very little difference between the two project communes visited, even though one had been part of the previous pilot project. It also found very little difference between the assisted communes and the two other non-project communes visited for comparison purposes. The non-assisted commune in Phnom Penh province appeared to be doing the same meetings with village stakeholders monthly. It also held village forums to raise issues and solve problems. It also had prices posted on its bulletin board for public documents. The more rural commune visited in Siem Reap province knew the Ministry of Information regulations for posting and sharing public information, but did not appear as well organized and had some incomplete information posted. However, they also appeared to do the village forums and informational meetings with key villagers.

At the village level, most of the villagers and shopkeepers interviewed in the project communes were not aware of API or its material, but knew where to go for information. Those interviewed in the non-assisted communes also knew where to go for information and the prices for documents. Some did not feel that this information was pertinent to them. This complacency and acceptance of their situation affected the effectiveness and impact of the project.

Some analysts felt that the value added of this type of project was that it could push authorities to answer citizen demands when the citizens themselves were afraid to do so. The participating CBOs could have been facilitated or empowered to do this by the project but they were not involved other than as participants in the commune meetings and village forums.

Nevertheless, API, the commune and village officials and CBOs that participated in the project, along with co-funder DanChurch Aid, thought the project made an impact even though they did not provide any specific examples beyond generalized statements such as increased awareness or a reduction in price because people now knew how much documents cost.

From the anecdotal information gathered during the interviews and from the reporting, it is likely that on a limited scale this project resulted in:



Local councilors and Chief of villages met in Toul Ampol, 2014

- **Participating commune councilors better aware of access to information requirements** and what that entails for them as public officials, and are more confident in sharing public information than other councilors in rural areas.
- **Some reduction in prices paid for public documents** than paid by villagers in other rural communes. However, in general these prices were still negotiated, and were above the posted price.
- **Reduced tensions between villagers and commune officials.** This was noted primarily by the commune officials themselves who felt villagers were not as quick to blame them for problems because they knew the rules better. The feedback from the forums also showed a high satisfaction rate for the roles played by commune officials, with almost 90 percent satisfied to highly satisfied and with almost 90 percent saying they had received responses to their questions posed at API events.
- **Increased number of phone calls to counselors** from villagers. In Toul Ampel, for example, Councilors said they had never received any calls previously as no one had their number. In Svay Rupea the council said they had never gotten calls before and now got calls every week. The Doctor also reported getting more phone calls as he had also posted all the staff's photos and phone numbers on the clinic's walls.
- **Personal empowerment for some participants** including local officials, CBO and perhaps some participating villagers. This is likely to have been limited since most commune and village officials appeared to have filled their roles for years and there was little follow-up for villagers who might have learned something new from the forums or materials distributed.
- **Increased levels of frustration** for some villagers because there was little or no response for issues they tried to raise with commune officials. Some of this was beyond the control of commune officials, such as a report of the governor seizing private land for supposedly public use, but the lack of response or provision of information of where they could go to next, fueled resentment against the officials and system.¹¹
- **Kept the need for access to information legislation on the national agenda** as API continued to raise the issue with policy makers. Requiring parties to sign a campaign pledge saying they would support this legislation if they won and following up with the opposition and Ministry of Information after the elections, is likely to make a difference in the long term.

(v) Sustainability

Even though the project needed more programmatic follow up to deliver sustainable results, API did build some elements of sustainability into the project design and implementation. These included:

- **Selecting participants from CBOs so that the individuals and knowledge remained within the area and local institutions for future efforts.**

¹¹ Evaluation interviews with villagers did not correspond with the high levels of satisfaction shown in the API forum survey results. The difference is likely due to the way the survey samples were chosen and/or having officials and/or API present during the interviews. This would have colored the answers. The UNDEF evaluators randomly selected villagers to interview and did it in their neighborhoods with no local officials or API persons present.

- **Organizing trainings before and after the elections** for commune officials. This ensured that if any new officials were elected in 2012, they would receive training.
- **Implementing activities that contributed to its institutional mission** as API continues to work in the access to information area through other donor funding. In particular, it received a large grant from the EU to continue this program at the district level and to expand the number of communes assisted.
- **Left filing cases for public documents and reference materials** with the communes. The commune of Svay Rompea commune produced a large amount of reference materials from the project, such as the large volume of Cambodian laws that appeared to have been used by them.

At the same time, participants lacked ownership for the project. Although they all felt it was useful, it was seen as an API project and not a commune one. As access to information remains a sensitive issue, commune officials might see it as easier for them if an NGO, such as API, pushes this issue rather than attempting to do it themselves directly.

The posters were still up on the outsides of houses in Toul Ampel, but the prices listed are obsolete. The project did not foresee any mechanism or system that could be left in place to update them as needed. The new prices were posted at the commune centers and health centers as required by their ministries. The API volunteer paid the transport and food for village forum participants. In one location, participants seemed to receive 6,000 Riels for attending. This is not sustainable for commune officials. Other communes that were holding the same type of public forums did it with larger crowds and without financial incentives.

The handover of the project appears to have been left unfinished. Although API said it had held a national meeting with commune officials to discuss the end of the project and the handoff for the village information boxes to district officials where API intended to continue working, this was not evident in the evaluation interviews. Svay Rompea officials said the project was still on-going and that API needed to do more follow up of their volunteer who had not been visible in the past year. They also said he had the key to the village boxes. As these boxes are at the village level, it would seem logical to have passed the keys onto the village and communal officials who could have incorporated them into their local systems, rather than skipping over the local authorities and expecting district officials to go down to the village level to check complaint boxes.

(v) UNDEF Value Added

UNDEF funding has a two-year timeframe. This gave API the time to do training officials before starting to work on increasing the awareness and demand of villagers, and to continue the work at the national level to advocate for an access to information law. The substantial nature of the UNDEF grant also gave the grantee the experience to manage a larger program and it was able to leverage this project to get a larger scale project and funding from the European Union to continue this work. The UN branding also gave enhanced credibility of the API efforts, especially with national level officials, political parties and candidates.

V. Conclusions

Based on the evaluation findings, the team concludes:

(i) The project purpose was important. Access to information remains a critical issue within Cambodia and there is still no national policy or legal framework. The approach of working at the grass roots to improve local access to information at the same time as lobbying for a national framework increased the project's relevance and kept this critical issue on the national agenda, especially over an election period. This conclusion follows the findings on relevance, effectiveness and impact.

(ii) The project fit the grantee's vision, mission and previous experience. Access to information is a focal point for API and it worked in coordination with the other national and international agencies working on the topic area. This avoided a duplication of efforts and helped ensure a unified approach at the national level. However, at the local levels, more programmatic focus at the demand side was needed for the activities to be more effective and to contribute to the social accountability outcome sought by the project. This conclusion follows the findings on relevance, effectiveness, impact and sustainability.

(iii) The soft approach provided access and ensured official participation as the project was perceived in a positive light and not as a threat. But it also meant that the grantee restrained its rights-based approach and activities with villagers and did not push councils to resolve the issues raised by their villagers. This made the ultimate objective for the project unclear and whether it was there to support the councils or the villagers' access to information. This conclusion follows the findings on relevance, effectiveness, efficiency, impact and sustainability.

(iv) The performance of the project would have been stronger with more follow up to its activities. The lack of follow up for many activities and the limited role played by the volunteer limited its relevance, effectiveness and impact. Links to other projects and/or participating CBOs or other NGOs that could have provided follow up were not made. This conclusion follows the findings on relevance, effectiveness and impact.

(v) The project did not adequately consider the participation of average villagers, and especially youth in its design or implementation. This project could have more impact had it included more of the villagers themselves, and especially youth who make up two-thirds of the population and who are Cambodia's future. This conclusion follows the findings on relevance, effectiveness and impact.

(vi) The project lacked adequate staffing to fully implement the meaning of the project. There were only two full time project staff and the part-time volunteers could not carry the load of activities at the local levels. This affected the programmatic elements of the project and its results. It also limited the supervision needed for the local volunteers and their work. This conclusion follows the findings on effectiveness, efficiency and impact.

(vii) Local authorities needed to be integrated into the collection and handling of village level complaints. The placement of boxes at village level was a good idea, but this created an artificial channel of communications as API managed the process rather than the local authorities. The councils showed no ownership over the boxes or responsibility for answering the questions/letters that were posted. This conclusion follows the findings on relevance, effectiveness, impact and sustainability.

(viii) The project might have had more significant results than was visible to the evaluators, but it is not possible to know as the project's monitoring and evaluation plan used different mechanisms to measure the start and end state of the assisted communes. However, the grantee did make a good faith effort to collect data to measure performance and reported fully on its outputs. The number of other actors working on access to information at the national level makes attribution of results there difficult to any one actor. This conclusion follows the findings on effectiveness and impact.

VI. Recommendations

To strengthen similar projects in the future, the team recommends:

(i) Determine if the main target is to strengthen official capacity to implement the MOI regulations on access to information **or to build citizen demand for increased access to information.** If both areas are targeted, API should either step up its efforts with citizens or partner with another human rights or developmental NGO that could help the villagers with their complaints and demands of their local and national government. This recommendation follows conclusions (i), (ii), (iii) and (iv).

(ii) More follow up of the citizen complaints given to authorities. As noted above, this could either be done directly by API providing this follow up through participating CBOs -- which could be given subgrants for these types of activities-- and/or by linking with a legal aid or other program that has the expertise needed to follow up on critical communal issues such as land tenure. It could also develop score cards for participating CBOs to complete every quarter on commune council's performance that these organizations could then discuss with the councils, other government agencies and make public. This recommendation follows conclusions (i), (iii), (iv), (v), (vi) and (vii).

(iii) Integrate local authorities into the village-level complaint process by giving them the responsibility to regularly collect and respond to the letters placed in the village-level boxes. This can be facilitated by the project but should not be done by the project rather than by the authorities to whom these letters are addressed. The project should also develop systems for the systematic response by the council to every complaint/letter received, so that citizens hear back on their inquiries and so that this effort is continued after the end of the project. This recommendation follows conclusions (iii), (iv) and (vii).

(iv) Provide for adequate staffing for the project to ensure that there is sufficient follow up for activities and enough supervision for volunteers. This recommendation already appears to be partially fulfilled for the follow-on EU-funded project which is providing for paid persons rather than volunteers. This recommendation follows conclusions (IV) and (vi).

(v) More inclusion and consideration for villagers, and especially youth participation in future activities, especially for interactions with communal council levels. Youth are more than two-thirds of the population and should be integrated into all civic participation and democratization activities. This recommendation follows conclusions (v).

(vi) Use the same indicators measured in the baseline for the end survey so that project performance can be more accurately measured. The project should ensure that it uses the same methodology and questions for its end survey that it used for its baseline so that it can better measure the results of its efforts. It should also include non-assisted communes within the surveys as control communes to account for any changes caused by external factors, such as government regulations. This recommendation follows conclusion (viii).

(vii) NGOs and international agencies should continue their work for access to information legislation as this is a fundamental element of the democratization process and required for citizens to be able to participate knowingly in the electoral and political processes, and to be able to hold their government accountable for its actions. This recommendation follows conclusion (i).

VII. Overall assessment and closing thoughts

UNDEF asked the evaluation team to compare the two projects it funded in Cambodia. Both projects focused on different but related elements of the democratization process. API on access to information, and the other grantee, the Neutral and Impartial Committee for Free and Fair Elections in Cambodia (NIFEC), focused on monitoring the electoral processes and voter/civic education. Both grantees took different approaches. API took a soft approach that worked with authorities at the same time as educating citizens on their rights. NICFEC worked primarily with monitors and issued reports critical of the problems evident in the electoral and political system. At the same time, it worked to educate voters on their rights in the electoral processes.

Both projects were stronger on the government side, either by building its capacity or by monitoring and publicizing its performance, than they were on the citizen empowerment side. However, they both were perceived very differently by the government and its officials. API was perceived as more impartial than NICFEC which was largely perceived as being with the opposition. API was much stronger at its reporting than NICFEC probably due to its roots as an internationally created project. This gave the perception of much better performance than NICFEC whose reporting and management systems were limited.

There are lessons learnt from both projects. One is that these human rights NGOs need to partner with another organization with a development perspective if they want to undertake capacity building efforts in addition to their advocacy and monitoring work. This is needed for their projects to incorporate the elements needed to effect sustainable change. Another is that good reporting is essential for a grantee to be able to demonstrate its performance.

It is difficult to assess which approach, hard or soft, was the more effective. API was widely seen as successful at working with government but lacking the drive needed to push the issues of access to information with the authorities and the concept of accountability. While NICFEC was seen as a successful elections monitor but had difficulties working with officials due to its opposition reputation. Both types of approaches are needed in the context of a country such as Cambodia, and the best approach is probably that each partners with others who can raise the hard questions, or work more easily with government, to advance the democratic objectives of their projects.

VIII. ANNEXES

Annex 1: Evaluation questions:

DAC criterion	Evaluation Question	Related sub-questions
Relevance	To what extent was the project, as designed and implemented, suited to context and needs at the beneficiary, local, and national levels?	<ul style="list-style-type: none"> ▪ Were the objectives of the project in line with the needs and priorities for democratic development, given the context? ▪ Should another project strategy have been preferred rather than the one implemented to better reflect those needs, priorities, and context? Why? ▪ Were risks appropriately identified by the projects? How appropriate are/were the strategies developed to deal with identified risks? Was the project overly risk-averse?
Effectiveness	To what extent was the project, as implemented, able to achieve objectives and goals?	<ul style="list-style-type: none"> ▪ To what extent have the project's objectives been reached? ▪ To what extent was the project implemented as envisaged by the project document? If not, why not? ▪ Were the project activities adequate to make progress towards the project objectives? ▪ What has the project achieved? Where it failed to meet the outputs identified in the project document, why was this?
Efficiency	To what extent was there a reasonable relationship between resources expended and project impacts?	<ul style="list-style-type: none"> ▪ Was there a reasonable relationship between project inputs and project outputs? ▪ Did institutional arrangements promote cost-effectiveness and accountability? ▪ Was the budget designed, and then implemented, in a way that enabled the project to meet its objectives?
Impact	To what extent has the project put in place processes and procedures supporting the role of civil society in contributing to democratization, or to direct promotion of democracy?	<ul style="list-style-type: none"> ▪ To what extent has/have the realization of the project objective(s) and project outcomes had an impact on the specific problem the project aimed to address? ▪ Have the targeted beneficiaries experienced tangible impacts? Which were positive; which were negative? ▪ To what extent has the project caused changes and effects, positive and negative, foreseen and unforeseen, on democratization? ▪ Is the project likely to have a catalytic effect? How? Why? Examples?
Sustainability	To what extent has the project, as designed and implemented, created what is likely to be a continuing impetus towards democratic development?	<ul style="list-style-type: none"> ▪ To what extent has the project established processes and systems that are likely to support continued impact? ▪ Are the involved parties willing and able to continue the project activities on their own (where applicable)?
UNDEF value added	To what extent was UNDEF able to take advantage of its unique position and comparative advantage to achieve results that could not have been achieved had support come from other donors?	<ul style="list-style-type: none"> ▪ What was UNDEF able to accomplish, through the project, that could not as well have been achieved by alternative projects, other donors, or other stakeholders (Government, NGOs, etc). ▪ Did project design and implementing modalities exploit UNDEF's comparative advantage in the form of an explicit mandate to focus on democratization issues?

Annex 2: Documents Reviewed:

Advocacy and Policy Institute website, <http://www.apiinstitute.org/>

Advocacy and Policy Institute, *The Organisation's Vision, Mission, Goal,*
<http://www.apiinstitute.org/index.php/who-we-are/the-vision>

Advocacy and Policy Institute, *Debrief Report on National workshop on 'Access to information in Cambodia: A step forward for development of an access to information law, 4-5 December 2013*

Advocacy and Policy Institute, *National Workshop on "Access to Information in Cambodia: A step Forward for development of an access to Information Law." 4-5 December 2013*

Article 19, *Cambodia: Access to Information law needed.* 10 December 2013,
<http://www.article19.org/resources.php/resource/37394/en/cambodia:-access-to-information-law-needed>

Cambodian Center for Human Rights, *Freedom of Information in Cambodia: A right to know or a culture of secrecy?* May 2012

DanChurchAID, *Improving People's Access to Public Information in Cambodia,*
<http://www.danchurchaid.org/projects/list-of-projects/projects-in-asia/improving-people-s-access-to-public-information-in-cambodia>

Electoral Reform Alliance, *Joint-Report on the Conduct of the 2013 Cambodian Elections*, November 2013

PACT Cambodia, *Freedom of Information, Cambodia*
http://www.pactcambodia.org/Publications/Anti_Corruption/FoI%20Brochure%20-%20English.pdf

UDF-CMB-10-381, *People's Access to Public Information, Project Document*, October 2011

UDF-CMB-10-381, *People's Access to Public Information, Mid-Term Progress Report*, Undated

UDF-CMB-10-381, *People's Access to Public Information, Final Progress Report (draft)* Undated

UDF-CMB-10-381, *People's Access to Public Information, Milestone Report No 2*, 25 July 2013

UDF-CMB-10-381, *People's Access to Public Information, Milestone Report No. 3*, 10 June 2013

UDF-CMB-10-381, *People's Access to Public Information, Project Reflections Report*, October 2013

UDF-CMB-10-381, *People's Access to Public Information, Statement of Receipts, Disbursements and Fund Balance for the Period From 01 March 2013 to 31 October, 2013* by AT& C 2012 (along with the audit reports for Milestones 1 and 2)

UDF-CMB-10-381, *People's Access to Public Information, Cash Books for Milestones 2 and 3* (along with the cash books for Milestone 1)

UDF-CMB-10-381, *People's Access to Public Information, Financial Utilization Report*, 31 October 2013

UDF-CMB-10-381, *People's Access to Public Information, Advocacy Access the quality of election information*, 2013

UDF-CMB-10-381, *People's Access to Public Information, Strategy for Promoting Passage of Access to Information Law*, 2013

UDF-CMB-10-381, *People's Access to Public Information, Access to Information, Baseline Survey*, 2011

UDF-CMB-10-381, *People's Access to Public Information Access to Information in Cambodia, Past Reflections, Future Directions*, 2012

UDF-CMB-10-381, *People's Access to Public Information Report on Training Needs assessment of Commune Councils and CBOs on Access to Information and Information Management*, 2012

UNESCO, *Freedom of Information*, <http://www.unesco.org/new/en/communication-and-information/freedom-of-expression/freedom-of-information/>

UNICEF, *Situational Analysis of Youth in Cambodia*, 2009

Annex 3: Persons Interviewed

2 March 2014	
Arrival of international consultant	
3 March 2014	
Mr. NEB Sinthay	API Director
Mrs. CHORN Somaly	API Administrative and Finance Manager
Mr. VANPANNIT Man	API Senior Programme Officer
Mr. Phan Phorp Barmey	API Programme Manager
4 March 2014	
Visit to Toul Ampel Commune, Borsedh District, Kampong Speu Province	
Mr. HEM Sophal	Commune Deputy
Mr. PECH Sorn	Commune Counsellor
Mr. OM Horn	Commune Counsellor
Mr. KUY Hoeun	Village Chief, Toul Ampel
Mr. PEL Man	Commune Counsellor
Mrs. UL Kim	Assistant to Village Chief, Toul Ampel
Mr. UY Sarim	Village Chief, Phum, Tro-paing Jum Rov
Mr. KEO Long	□/□, Phum Ta Mern
Mr. NEAK Ban	Village Chief, Toul Ampel
Mr. SEANG March	Village Chief, Tropaing
Mr. NHEM Thoeun	Deputy Village Chief, Tropaing
Mr. NOEUNG Thorn	Village Chief, Tai Sreing
Mr. MEAS OEUT	Village Chief, Prey Sro-Laing
Mr. KHEV Ourk	Deputy Village Chief, Phan
Mrs. HER Nheom	Villager representative, Prey Sro-Laing
Mrs. SOEUNG Lok	Deputy Chief, Me Leav
Mr. KONG Sokha	Deputy Chief, Prey Khla
Mr. DANG Tum	API Volunteer, Toul Ampel
Mrs. EN Pov	Villager, Toul Ampel
Mr. OUK Pov	Villager, Toul Ampel
Mr. KHUON Loen	Villager, Toul Ampel
Mr. Chan Oun	Villager, Toul Ampel
Mr. HAK Vet	Villager, Toul Ampel
5 March 2014	
Visit to Svay Rompea Commune, Kampong Speu Province	
Mr. MEAS Sokleng	Commune Deputy Chief
Mr. ET Savoeun	Commune Council Member
Mr. KET Chun	Commune Council Member
Mr. SAT Pha	Commune Deputy
Mr. KONG Horn	Village Chief
Mr. CHAV Samutt	Village Representative
Mr. CHAN Dara	Administrative Assistant

Mrs. KHY Meng	Deputy-Chief of Village
Mr. SUN TekHeng	Village Chief
Mrs. PREAB Khon	Member of Commune Council
Mr. MEAS Chrun	Member of Commune Council
Mrs. OUCH Sophea	Member of Commune Council
Mr. NOUN Seyma	Member of Commune Council
Mr. EM Srim	Deputy Village Chief
Mrs. CHHOUN Leang	Member of Commune Council, Clerk
Mr. YOY Savoeun	Member of Commune Council
Mr. MOK Hean	Village Chief
Mrs. CHHAY Phan	Member of Commune Council
Mr. Khun Tharith	Teacher, Slab High School, Svay Rompea
Mr. Sok Vuthy	Teacher, Slab High School, Svay Rompea
Mr. Soeun Kech Leng	Student, Slab High School, Svay Rompea
Mrs. Ong Pengnam	Student, Slab High School, Svay Rompea
Dr. Keath Konthol	Doctor, Heath center, Svay Rompea
Mrs. Poly Chou	Shop keeper, Svay Romea

6 March 2014

H.E Mr. Buth Bovuth	Director General, Department of Information and Broadcasting, Ministry of Information
Mr. Phos Sovann	Advisor to the Ministry and Deputy General Director, General Department of information and Broadcasting, Ministry of Information
Mr. Poue Piseth	Director of the Media Center, General Department of Information and Broadcasting, Ministry of Information
Mr. Chiv YouMeng	Programme Officer, Danchurch AID and Christian Aid
Mr. Tony Posnett	Former Project Director at SEDECA , currently Programme Manager, HAGAR International

Visit to Chrouy Chanvar Commune, Phnom Penh Province

Mr. Vong Ratanac	Director, Chrouy Chanvar Primary School
Mrs. Pou Ry	Shop owner, Chrouy Chanvar
Mr. Om Rith	Commune Clerk Assistant, Chrouy Chanvar
Members of Administrative Staff	Commune Office, Chrouy Chanvar

7 March 2014

Mr. Socheath Heng	Project Manager, Strengthening Democracy Programme, UNDP
Mr. Munthit Ker	Public information and Media Officer, UNDP
H.E. Mr. Men Kuon	MP, Committee for Foreign Affairs International Cooperation, and Media, National Assembly
H.E Mr. Chheang Vun	MP, Chairman, Committee for Foreign Affairs International Cooperation and Media, National Assembly
Mr. Lam Socheat	API, Deputy Director
Mr. VANPANNIT Man	API Senior Programme Officer
Mr. Phan Phorp Barmey	API Programme Manager
Mr. Son Chhay	MP, Chief Whip of CNRP Party.

Mr. Keo Phirum	MP-Elect, CNRP Party
8 March 2014	
Mr. Keo Ngoun	CBO Representative, Development community Toul MeanChey Village, Svay Rumpear commune, by phone
Mr. Mok Han	CBO Representative, Development community Slag Village, Svay Rumpear commune, by phone
Mr. Nhem Seun	CBO Representative, Agriculture Development Community (THUK VEN MEAN CHEY), Thlok Vean commune, by phone
10 March 2014	
Mr. Suon Bun Rith	Independent consultant. Author of the Final Reflection report
Ms. Amamda King	CCIM/VOD, Fund Raising and Communication Manager
Mr. Nop Vy	CCIM/VOD, Media Division Manager
11 March 2014	
Travel to Prasat Bakomg District, Siem Reap Province (primarily for UDF-CMB-09-381)	
Ms. Tom Hing	Shop keeper Bakomg Commune
Ms. Roeun Ret	Shop keeper Bakomg Commune
Ms. Huy Sarina	Shop keeper Bakorng Commune
Mr. Lam Polin	Director of Lolei Primary School, Bakomg Commune
Mr. Yon Vorn	Chief of Commune, Bakorng
Mr. Luy Chhorn	Member of Commune Council, Bakomg
Mr. Poy Pali	Student, Bakorng High School
Hoeuv Sokha	Student, Bakorng High School
Mr. Soun Say	Youth, Bakomg Village
Ms. Leun Sol	Youth, Bakomg Village
Ms. Chhin Chorda	Youth, Bakomg Village
12 March 2014	
Dr. Kem Ley	Independent Consultant, 2013 Author of Access to Information Study
Mr. Tim Meisburger	Regional Advisor, The Asia Foundation (by skype)

Annex 4 : Acronyms

A2I	Access to Information
API	Advocacy and Policy Institute
CBO	Community Based Organization
CCIM	Cambodian Center for Independent Media
CCP	Cambodian People's Party
CNRP	Cambodian National Rescue Party
MOI	Ministry of Information
MP	Member of Parliament
NGO	Non-Governmental Organization
PAPI	People's Access to Public Information Project
TA	Technical assistance
UNDEF	United Nations Democracy Fund
UNDP	United Nations Development Programme
UNESCO	United Nations Educational Scientific and Cultural Organization
USD	United States Dollar