

GGF Monitoring and Updating as at December 2010

Issues	Action to Mitigate Risk	Responsibility	Target/ Monitoring	Implementation Status as at December 2010	Action Plans	Revised Target Date	Any Resources Required
1	2	3	4	5	6	7	8
Element 1. Procurement							
<p>Ia. Reduce potential irregularities.</p>	<p>Unless otherwise agreed between the RGC and IDA, the RGC shall use the services of an International Procurement Agent (IPA) engaged by MEF under TOR satisfactory to IDA for all procurement under all components of the Project, with the following exceptions, which shall be carried out by the respective component IA:</p> <p>1. procurement under all components (i) through direct contracting, (ii) from UN agencies, (iii) by single source, and (iv) by sole source selection; and</p> <p>2. Procurement financed by sources other than IDA, including the RGC and all bilateral donors.</p> <p>For procurement undertaken by the IPA, each component IA shall prepare technical specifications for goods and works and TOR for consultants and hand over to the IPA, who shall prepare</p>	<p>MEF – IPA commenced work in December 2007.</p> <p>Component IAs.</p> <p>Component IAs.</p> <p>Component IAs.</p>	<p>All components IAs to agree IPA’s role by negotiations. To be reflected in the Grant Agreement.</p> <p>IDA to monitor through supervision missions and prior and post reviews.</p> <p>IDA to monitor through supervision missions and prior and post reviews.</p> <p>IDA to monitor through supervision missions and prior and post reviews.</p> <p>Supervision of IPA by the RGC’s Inter-Ministerial Procurement</p>	<p>DFGG has passed all procurement responsibility to the IPA with effected from December 2007; However, refer to a letter of MEF date 15 December, 2008 which outlined the future arrangements for using IPA services under the World Bank project. In this regard, all the threshold for procurement of goods and also works individual consultant from \$50,000 to \$ 100,000 per contract has been excluded from the IPA’s scope and be undertaken by the project implementing agencies themselves.</p> <ul style="list-style-type: none"> The PCO’s ITA – Procurement Specialist and Procurement Officer worked with the IAs and IPA to assist them in preparing TOR for consultant services. The procurement tracking form has already developed by the ITA-Procurement Specialist The IAs has submitted its tracking form to the PCO for review as monthly basis. 	<ul style="list-style-type: none"> Continue working closely with IPA, MEF and IAs in preparing of the technical specifications for goods and works and TOR for consultants and hand over to the IPA for further proceed. 		

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	bidding documents and RFPs, call and evaluate bids and recommend award, all in accordance with the WB's Procurement and Consultant Guidelines and the Procurement Provisions of the Financing Agreement, including the use under NCB and Shopping methods of the RGC's Externally Assisted Procurement Manual for Goods, Works and Services (SOP/PM), mandated by MEF Sub-Decree No. 14 dated February 26, 2007.	Included in IPA's TOR.	Committee (IPC). IDA monitoring of IPA's work through quarterly review meetings and prior and post reviews.		<ul style="list-style-type: none"> • IPA/PCO to insure Monthly Status Report provided to PCO for review 		
1b. Ensure adequate procurement capacity of each IA component.	IDA has reviewed the procurement capacity of each IA and action plans are developed to address capacity issues.	Component IAs with IDA NOL (see IA-specific GGPs).	Implementation of action plans including recruitment of staff by advance action, with staff in place at project commencement.	<p>PCO has been continuing assists to each IAs with regards to the procurement issues as daily need.</p> <p>A one-day Training Program on Procurement procedures was conducted by the World Bank Procurement specialist on September 22, 2009 for all IAs.</p> <p>In order to help address some of the existing procurement related issues, and to further strengthen the procurement capacity of the IAs, the PCO is hiring an international consultant (ITA) who would be housed at the PCO and provide technical and capacity building support related to procurement to all IAs. The consultant started assignment on June 07, 2010. The consultant provided IA's two (2) Procurement Training Programs in</p>	<ul style="list-style-type: none"> ▪ Continue providing the procurement capacity to the IAs through the classroom and on the job training programs. ▪ A separate of details training program will be developed by ITA. ▪ Extension the contract to ITA for another six months period 		

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				September/October , PM, NCB, NS, RFP <ul style="list-style-type: none"> • The procurement capacity building program to the IAs has been conducting by ITA-Procurement Specialist through on the job training. • A detailed training program was developed by ITA-Procurement Specialist in coordination with IAs' procurement office as weekly basis. • The contract extension to ITA-Procurement Specialist is underway. 			
1c. Avoid risk of inadequate or delayed Procurement Plans.	Each IA to prepare realistic annual Procurement Plan based on its Annual Work Plan and Budget. Procurement Plans for the first eighteen months of project implementation have already been developed.	Component IAs with IDA NOL (see IA-specific GGPs). PCO to coordinate.	First 18-month Plan agreed at appraisal. PCO to submit preliminary updated estimates to MEF and IDA annually in June (for MEF budget estimates), preliminary updated plans by September, and final updated plan by December.	12 months procurement plan for year 2010 of DFGG project was already revised and submitted to the World Bank by CKP-IPA in early of March, 2010 for final review and approval <ul style="list-style-type: none"> ▪ A preliminary updated estimates budget for 2011 has been prepared and submitted to MEF on June 08, 2010 ▪ The Bank has provided NOL on 12 months procurement plan for year 2010 on June 04, 2010. ▪ 12 months procurement plan for year 2011 of PCO has been prepared and incorporated into the AWP 2011. Full compliance to date.	<ul style="list-style-type: none"> ▪ Each IA to provide PCO monthly updated Procurement Tracking form to M&E/PCO ▪ PCO will continue its coordination and working closely with IAs and IPA in consolidation of the 12 months procurement plan for year 2011. 	Nov,2010	

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1d. Informal payments by contractors, suppliers and consultants.	All contractors, suppliers and consultants – firms or individuals, national and international – bidding for contracts under the project shall sign the Declaration on Ethical Conduct and Fraud and Corruption in the SOP/PM. Amend item 5 of the Declaration to read: “In connection with this procurement exercise and any contract that is awarded to us as a result thereof, no payments have been made or will be made by us, our associates, agents, shareholders, partners or their relatives or associates to any of the staff, associates, consultants, employees or relatives of such who are involved with the procurement process, contract implementation, and the issuance of progress payments on behalf of the purchaser, client or employer.” Amended Declaration to be included in all bidding documents, requests for proposals (RFPs), and contracts.	IPA through MEF instruction.	PCO to monitor. IDA to verify through prior and post reviews.	PRC always signed the declaration on ethical conduct and fraud and corruption for every bidding evaluation.	<ul style="list-style-type: none"> ▪ PCO will work closely with IPA and MEF in monitoring the declaration on Ethical Conduct and Fraud and Corruption. 	Dec,2010	

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Element 2. Financial Management							
2a. Strengthen internal controls.	All component IAs to follow SOP/FMM procedures, mandated by Sub-Decree No. 14 dated February 26, 2007, supplemented by a project-specific Financial Management and Disbursement Manual (FMDM) adopted by IAs and PCO.	FMDM acceptable to DFGG Project Coordinator completed and obtain IDA NOL. Each component IA Chief Financial Officers to ensure compliance.	FMDM agreed by negotiations. Reflect use of SOP/FMM and FMDM in Grant agreement. IDA to verify compliance during supervision missions. PCO Internal Audit Unit to carry out spot checks on compliance.	<ul style="list-style-type: none"> ▪ The Financial Management and Disbursement Manual (FMDM) has recently updated and publication by the PCO ▪ The contract negotiation with 1 & 2 ranked candidates (ITA-Internal Auditor) was underway while one national internal auditor would commence the work on January 01, 2011 and other one will re-procurement process. ▪ A detailed annual audit plan has not been developed; however, physical asset inspection to the IAs has been conducting by the PCO. 	<ul style="list-style-type: none"> ▪ PCO will expedite the process of recruitment the position of internal auditor for both national and international consultants ▪ Develop a detail annual audit plan and implementation 	Nov,2010 Dec,2010	
2b. Strengthen financial management capacity.	PCO will recruit a qualified accountant as Financial Management Adviser for the whole Project, and a Project Accountant and two accounting officers for duties within the PCO, all under TOR acceptable to the IDA. Each IA to implement the detailed action plans (including training and recruitment of staff) which have been developed to address issues identified through the financial management capacity assessment carried out during project preparation.	PCO with IDA NOL. See component specific GGP.	TOR agreed and included in Component 3 proposal. Recruit by Feb 2009.	<ul style="list-style-type: none"> ▪ Financial Management Advisor (FMA) was on board with the project since August, 2009. ▪ PCO has provided technical assistance to each of the IAs with regards to the financial issues as daily need. ▪ A one-day Training Program on Financial Management and Disbursement Procedures was conducted by the World Bank Financial specialist on September 23, 2009 for all IAs. ▪ The ITA- Financial Specialist consultant was on board and commenced the works on June 28, 2010. However, the key focus areas on strengthen and capacity building support to all IAs have not undertaken 	<ul style="list-style-type: none"> ▪ Continue strengthening financial management capacity to the IAs through the international financial management expertise. 	Dec,2010	

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				by ITA.			
2c. Ensure uniform Project accounting and readiness of proprietary software.	PCO will ensure that each component IA establishes a uniform Project accounting system with a common chart of accounts, using a proprietary software package satisfactory to the IDA.	PCO with IDA NOL.	Agree proprietary package by October 2008. PCO to install by effectiveness. IDA to monitor correct use during FM supervision missions.	<ul style="list-style-type: none"> ▪ The Conical Hat Software (Cambodia) Ltd has been selected and commenced the work on May 21, 2010. ▪ The project accounting software has already been installed for the concerned state implementing agencies and partially functioning. 	<ul style="list-style-type: none"> ▪ The PCO will work closely with the Conical Hat Software Ltd to finalize all the pending technical issues regarding computerize. 	Nov,2010	
2d. Ensure comprehensive FM reporting.	All components IAs will utilize a template for interim FM reporting which has been developed and will be agreed. Reports to be submitted to IDA quarterly not more than 45 days after the end of the reporting period.	PCO and all components IAs.	Agree template by negotiations. PCO to monitor FM reports by component IAs for compliance with agreed template and submission deadlines.	<ul style="list-style-type: none"> ▪ The template for interim financial management reporting has been developed and official using by the IAs for submission to the Bank within the 45 days deadline. 			
2e. Ensure effective internal audit in all components IAs.	An Internal Audit Unit comprising an experienced internal auditor and two national and one international assistants will be established in the PCO and be responsible for internal audit of all Project components, including the provincial activities of component IAs.	PCO will prepare TOR for Internal Audit Unit with IDA NOL. PCO will recruit auditors.		<ul style="list-style-type: none"> ▪ TOR for both national and international auditor consultants had already developed as well as got NOL from the Bank ▪ The contract negotiation with 1 & 2 ranked candidates (ITA-Internal Auditor) was underway while one national internal auditor would commence the work on January 01, 2011 and other one will re-procurement process. 	<ul style="list-style-type: none"> • PCO will expedite the process of recruitment the position of internal auditor for both national and international consultants • Develop a detail annual audit plan and implementatio 	Nov,2010 Dec,2010	

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2f. Annual external audit of whole Project.	An independent auditor acceptable to IDA will be appointed to carry out an annual audit of project financial statements and effectiveness of internal controls, in accordance with TOR satisfactory to IDA.	PCO to prepare TOR and obtain IDA NOL. IPA to recruit external auditor.	Agree TOR by June 2009. Appointment in time for first annual audit, first quarter 2010.	<ul style="list-style-type: none"> ▪ Ernst & Young has been appointed under the audit bundling exercise to be the auditor for FY08-FY10 and first audit was covered for PPF1 & PPF2 and its firm has commenced their works from late of September to early of October, 2009. ▪ The second audit has been conducted by Ernst & Young for all the six implementing agencies (IAs) and its scope was covered from project effectiveness June 24 up to December 2009. The firm was commenced their work from 19th of April to 14th of May 2010. ▪ Completed external audit (PPF1-PPF2 & June-Dec 09). The draft audit report has already submitted to the WB, however there will be improving on some technical aspects as previously agreed between the project and the external audit firm. 	<ul style="list-style-type: none"> • The final external audit report will be available by mid-November, 2010 • PCO will work with Ernst & Young external audit firm to prepare the annual external audit plan for 2010 	Nov,2010	
2g. Minimize cash transactions.	All progress payments to contractors, suppliers and consultants - firms, individuals, national and	Each component IA Chief Financial Officer.	PCO to monitor all other component agencies and report quarterly to MOI. IDA	Partially compliance Full compliance to date by all IAs component agencies.	<ul style="list-style-type: none"> • PCO is regularly monitor as quarterly 	Dec,2010	

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	international - to be made by check or transfer to bank accounts. Retain evidence for audit and IDA supervision missions. Petty cash transactions to be limited to amounts less than US\$500 equivalent.		to monitor during supervision missions.		basis		
2h. Avoid inconsistency in allowances paid to Government staff attending training, workshops and study tours	Adopt MEF Decision Letter No. 2000 of April 23, 2007, for DSA rates for in-country travel. For international travel, some of the DSA rates specified in Anukret 10 of April 12, 2004 are position-based and/or higher than UN norms and are not acceptable to IDA for application on IDA-financed projects.	MEF/IDA to discuss and agree standard DSA for international travel, after which MEF to advise MOI. PCO to ensure compliance of all components IAs.	International DSA rates to be agreed by October 2008. Until then, IAs may use IDA rates for overseas travel. IDA to monitor SOEs with withdrawal applications.	Met. PCO followed the MEF's guidelines for Per Diems and travel allowances for the PCO counterpart staff as well as national consultants.	<ul style="list-style-type: none"> PCO is regularly monitor as quarterly basis 	Dec-2010	
2i. Planning of training, workshops and study tours.	Each component IA will establish an Annual Training and Workshop Plan in accordance with its approved Project Proposal. The Plan should include: <ol style="list-style-type: none"> Detailed costs estimates. Eligibility rules for attending training, workshops and study tours. Attendees must: <ul style="list-style-type: none"> be engaged in work relevant to the training; be competent in the language used; after return, report on and share their experiences for the benefit of the project. Evidence that training, 	The PCO will coordinate component IA Plans and submit to IDA for NOL. PCO and project agencies to follow Working Group guidelines when issued (see below). Working Group comprising MEF, IAs of all projects and	NOL in September and final budget in December in the year preceding the budget year. IDA to verify through its membership of Working Group. Establish Working Group by August 2008. Agree guidelines and issue	A detail of Annual Training and Workshop Plan and study tours have been developed for year 2010. The Working Group and guidelines has already been established Full compliance to date.	<ul style="list-style-type: none"> Continue monitoring and working closely with IAs regarding the operation of training, workshops and study tours. Continue preparing a Request for Sub-Project Approval (RSA) for every training and workshops 	Dec,2010	

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	<p>workshops, study tours and other similar activities:</p> <ul style="list-style-type: none"> • are in line with project aims and objectives • meet identified needs within the subcomponent plans • have budget in line with planned expenditure. <p>Cost guidelines to be established for selected training/workshop activities:</p> <ul style="list-style-type: none"> • venue rental with refreshments/meals • sound and projection equipment hire • stationery/hand-outs • project-specific training and workshop materials • simultaneous translators • photocopying, reproduction, translation <p>Define evidence to be submitted by attendees for reimbursement of expenses which may include:</p> <ul style="list-style-type: none"> • proof of attendance for period claimed with signed statement by the workshop, training or study tour organizer or host; • proof of travel by air – ticket stubs, travel agent’s receipt, airline boarding passes • receipted hotel bills (for proof of stay); • receipts for incidental travelling expenses; 	<p>IDA.</p> <p>Working Group to define evidence and include in directive. PCO to ensure compliance of component IAs.</p> <p>Each component IA Chief Financial Officer.</p>	<p>directive to all IDA-funded projects by end-December 2008.</p> <p>Directive issued by December 2008. IDA to monitor SOEs with withdrawal applications.</p> <p>PCO to monitor compliance. IDA to monitor SOEs with withdrawal applications and verify during supervision missions.</p>				

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	<ul style="list-style-type: none"> • Receipted invoices for venue rental, food and beverage, sound/projection equipment, hire of simultaneous translator, stationery and handouts, use of photocopying facilities. Reimburse against receipts except where covered by fixed allowances in MEF's letter No. 2000. Evidence of payment to be kept for attendees' per diem and allowances.						
2j. Avoid delayed or non-existent reconciliation of advances for operating costs and expenses.	Each component IA will maintain an advance register, vehicle logbook and fuel register. Advances for operating costs and expenses to offices, individuals or groups involved in project activities to be reconciled within two weeks of the end of each month. No further advance to be paid to an office, individual or group until its previous advance is reconciled and cleared against documentary evidence.	Each component IA Chief Financial Officer.	PCO to monitor compliance. IDA to verify during supervision missions.	The PCO had already developed fuel register and vehicle logbook and sent it to all IAs for operation.	<ul style="list-style-type: none"> • PCO will continue its monitor and working closely with IAs regarding the reconciliation of advances for operating costs and expense, vehicle logbook and fuel register. 	Dec,2010	
2k. Establishment of Priority Operating Costs (POC) schemes as an interim measure to replace the MBPI/PMG	The Government has issued a Sub-Decree 66 dated July 12, 2010 outlining policies and procedures for implementation of the Priority Operating Costs	PCO works closely with other development partner-funded project who	The financing under POC will start when POC agreement (POC terms of reference and management contract) at the sector / ministry	The Project Coordination Office (PCO) and the concerned IAs has prepared the manual respectively. The consolidated manual has been submitted to CAR on September 13, 2010 for review and further comments.	<ul style="list-style-type: none"> • There will has a meeting among the concerned IAs to review the POC 	Nov,2010	

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incentives for State implemented components.	(POC), which is the operating cost for civil servants who are working on strategic development priorities of ministries and institutions according to the agreement of the Royal Government of Cambodia and Development Partners.	housed at the MOI to develop the POC for the Ministry based on CAR's draft guideline including cost sharing basis, for MEF and IDA approval.	level is signed. PCO to monitor application.	On-going activities	<p>scheme documents prior submitting to the Bank for review and comment,</p> <ul style="list-style-type: none"> • The PCO will submit the consolidates POC schemes documents to the Bank by November 15, 2010 • The PCO will keep sharing its information with the state implementing agencies regarding the developing of the POC schemes • The final of the POC schemes documents will submit 		

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					<p>to CAR as soon as receive NOL from Bank.</p> <ul style="list-style-type: none"> The PCO and IAs will attend a meeting which will be conducted by CAR, MEF for additional discussions on the POC schemes 		

Element 3. Disclosure

3a. Minimize conflict of interest among project staff.	Project staff to disclose private and public affiliations or personal interest before becoming involved in any project-related transaction or contract award decision.	Project managers of all components IAs to ask for and retain written disclosure.	PCO to monitor. IDA to verify during supervision missions.	On-going	<ul style="list-style-type: none"> PCO will work closely with the IAs to disclose all the relate information. 		
3b. Enhance transparency through greater public disclosure of project information.	Component IAs to disclose information on their individual websites in accordance with guidelines set forth in their Communication Plans, with hard copies available at component IA offices for public inspection on request. As a minimum, disclosed information is expected to include: <ul style="list-style-type: none"> project name, objectives, 	PCO to coordinate lists of information to be disclosed by each component IA and agree with IDA. Each component IA responsible for	By Negotiations. PCO to monitor progress during reviews. Biannually. PCO to monitor compliance and IDA to verify during supervision missions.	<ul style="list-style-type: none"> The component IAs' website has already been developed and launching: ACF: www.arbitrationcouncil.org MONASRI: www.monasri.gov.kh OWSO: www.owso.gov.kh RNK: www.rnk.gov.kh PCO: www.dfggmoi.gov.kh TAF: www.dfgg-nsac.org.kh On-going	<ul style="list-style-type: none"> Continue to disclose the relevant project information, based on the Disclosure Tracking Sheet. PCO will regularly monitor the 		

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	<p>original and revised amount, sources of funding, effectiveness date, original closing date, revised closing date, number of extensions, name and address of implementing agency, name of Project Director with contact information, name of WB TTL and contact information in the MEF-WB unit and WB Office in Cambodia</p> <ul style="list-style-type: none"> • IA project proposals agreed at appraisal • Annual Work Program and Procurement Plan, identifying contracts to be procured in next 12 months, nature of each contract, location, method of procurement, means of advertisement, bidding period, location where bidding documents and RFPs can be inspected, expected date of availability, and cost of bidding documents • consultant long and short lists • bidding documents and RFP's to be available for inspection • bid closing dates, names of bidders and their bid prices at opening • list and details of contracts awarded, names of losing bidders and, if their bid prices were lower than the winning bidder, the reason for their rejection 	disclosure of information concerning its component. IPA will disclose procurement information			Disclosure Tracking Sheet of all IAs		

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	<ul style="list-style-type: none"> • project progress reports, detailing project components, percentage completion, data on performance indicators, and planned and actual disbursements by subcomponent • annual financial statements and audit opinion • other specific reports prepared by the project • complaints and remedies and mechanism • code of ethical conduct 						
3c. Enhance Project visibility through the media.	Component IAs and the PCO to implement the project's Communication Strategy so as to raise public awareness on governance issues, report on Project activities, help protect reform leaders and their civil society partners from reprisals and backlash, and manage negative publicity and scandals.	Component IAs and the PCO.	Continuously after Project commencement. PCO to monitor progress. IDA to verify implementation during supervision missions.	<ul style="list-style-type: none"> ▪ Extensive disclosure of project information through media during meeting, workshop/seminar, radio talkback program and LCFG activities has been continuously implemented. ▪ The concrete Communication Strategy has been developed for component 3 B and submitted to WB for reviews and comments ▪ The media briefing has been conducted by PCO on June 18, 2010 at Journalist Club with participation from mass media representative, TV, radio and newsletter, total 26 persons were participated. ▪ The first and second project bulletins has been published and distributed to all the relevant stakeholders. ▪ Radio spot on good governance has been broadcasting while TV spot is being finalized by producers. 	<ul style="list-style-type: none"> • Continue enhancing Project visibility through the media • TV spot on good governance will be broadcasting on TV channels on November 2010. • Drama Series on good governance will also be broadcasting on radio channels on November 2010. • Media briefing will be conducted 		

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				On-going.	by PCO on December 2010. <ul style="list-style-type: none"> • The DFFG Forum is going to conduct on December 2010 • Round Table Discussion will be organized on December, 2010. 		
Element 4. Civil Society Role							

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Greater involvement with CSOs.	All components IAs to implement their Partnership Plans included in the PIM, which will include the involvement of CSO(s) in selected aspects of project implementation and invitation to observe selected events. All major CSO involvement to be recorded in Project progress reports.	PIM to be cleared by MOI and subject to NOL from IDA. PCO to coordinate with all State components IAs on reporting.	Agree PIM during DFGG pre-implementation stage ¹ . PCO to monitor CSO involvement in State components. IDA to verify during supervision missions.	On-going. PCO to monitor CSO involvement in State Components and all components IAs in DFGG project have been established their own Partnership Plan with CSOs respectively. Currently, there are 62 partnerships have been performing within State and Non-State Institutions for DFGG Project.	<ul style="list-style-type: none"> The PCO will continue to records and updates the progress of implementation in the partnerships plan within the project as monthly basis The progress reports on partnerships performances will submit to the Bank for review at the end of each month. 		
Element 5. Complaints and Remedies Mechanism							
5a. Introduce a formal Complaints Handling System covering all components of the project.	The PIM will include a project-wide CHS, specifying (i) complaints and remedies mechanism for each component IA; including sub-procedures specific to particular components as necessary, and (ii) a Complaints Handling Mechanism housed at the MOI to address issues that cannot be resolved at the level of individual IAs (see	PCO with IDA NOL to PIM IPA/PCO	Agree PIM during DFGG pre-implementation stage. PCO to monitor adoption of CHS. IDA to verify during supervision missions. IDA to monitor during prior or post reviews.	The complaints committee (CC), complaints book, and details address of complaints have already been developed. CC's membership: - Project Director of DFGG-PCO Chair - Project Director of DFGG-MONASRI Member - Project Director of DFGG-RNK Member - Internal Auditor of PCO Member - Project Director of DFGG-TAF	<ul style="list-style-type: none"> The PCO will work closely with the IAs in development and improvement of the CHM To ensure that the complaints and remedies mechanism 		

¹ The DFGG pre-implementation stage is currently scheduled to run from May to December 2008.

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	Section 13). Complaints procedures regarding procurement to follow process set out in SOP/PM			Member - Executive Director of ACF Member - Representative of RTO Observer - The PCO has been requesting to IAs to develop its own complaints handling system and submitting to the PCO for consolidates. On-going	for each component IA would be available in the websites. • The PCO will consolidates of the CHM and posting into the PCO and IAs websites		
5b. Support the formal complaints mechanism with establishment of help lines and feedback channels.	PCO will establish informal advice- and information-giving mechanisms, as well as consultative meetings, dialogues and workshops, allowing for informal feedback to be provided, in a format and manner appropriate to the needs of the broad stakeholder of Project initiatives (especially those potentially affected by the project's initiatives).	PCO in consultation with component IAs to prepare mechanisms and include in the PIM.	Agree PIM during DFGG pre-implementation stage. PCO to monitor usage of help line and feedback channels. IDA to verify adoption during supervision missions.	The CHM has already set up in the Project Implementation Manual (PIM) On-going	• A consultative meeting on the complaints handling mechanism performances will be done through the PMT meeting by bi-monthly		
Element 6. Code of Ethical Conduct							
6a. No overall Code of Conduct for civil servants.	Each component IA to design Code for its project staff, including contracted staff, to sign individually. Government agencies may incorporate material from the Civil Service Statute of 1994.	Each component IA to design its Code.	Design and furnish copies to IDA during DFGG pre-implementation stage. PCO to monitor adoption. IDA to verify adoption during supervision missions.	The counterpart staff will implement its code of ethical conduct base on POC scheme, while contracted staff was applied its code of conduct in accordance with their individual Contract Agreement.	• The PCO will disclose code of ethical conduct in the website after the POC scheme has taken effect.		
Element 7. Sanctions							
7a. Reinforce Code of Conduct with sanctions for fraudulent and	Each component IA to identify and apply to project staff sanctions available	Each component IA to identify and	Define and furnish copy to IDA during DFGG pre-	The WB Group's Anti-Corruption Guidelines (ACG) was included in PIM volume 2. There were no any sanctions	n/a		

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corrupt activity by staff of project agencies, contractors, suppliers and consultants.	under current law of Cambodia and its own regulations. Sanctions against contractors, suppliers and consultants will be those defined in Section 3 of the SOP/PM. IDA to apply sanctions available in its general and project-specific legal agreements, including the WB Group's Anti-Corruption Guidelines (ACG) and Sanctions Regime introduced in October 2006 and as may be updated subsequently.	disseminate with Code of Ethical Conduct. IDA to provide copies of its ACG and Sanctions Regime to PCO and all IAs.	implementation stage. PCO to monitor application and IDA to verify during supervision missions. Copy of ACG and Sanctions Regime provided to PCO during appraisal. IDA may apply sanctions whenever evidence is found.	have been done during this reporting period.			
Element 8: Project Specific Elements							
8a. Verification and technical audit to prevent capture of Project resources for non-intended recipients or for personal benefit of individuals or groups with vested interests.	The PCO will recruit a team of independent technical audit consultants, both international and national, to carry out intermittent audit of all activities of the Project. The focus will be on due diligence to verify that goods, works and services being financed by the IDA Grant are in place in the specified quantity and acceptable quality, counterpart resources are in place, and that outputs of all activities are in line with Project design.	PCO will prepare TOR and obtain IDA NOL. PCO will recruit the technical audit consultants with IDA NOL during recruitment process.	During DFGG pre-implementation stage. Consultants in place by June 2009.	The external audit firm was recruited by IPA through MEF, while National and International Internal Auditor Consultants are on procurement process.	<ul style="list-style-type: none"> PCO will expedite the process of recruitment the position of internal auditor for both national and international consultants Develop a detail annual audit plan and implementation 	Nov,2010	
8b. Use the GGF as a management tool with regular reviews and updates by mutual	PCO with senior management of component IAs to conduct quarterly reviews of the GGF and any	PCO and all IAs.	PCO to report to the Government's ACWG and IDA within two weeks of each	Met. GGF was updated as quarterly basis through the consultations workshop and PMT meeting	<ul style="list-style-type: none"> Continue reviewing GGF through PMT meeting 		

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agreement.	<p>other fiduciary risks, identify early warning signs and mitigation measures, and propose updates of the GGF as necessary for the IDA's consideration, to ensure that effective and adequate controls are in place.</p> <p>The PCO, with assistance from the Project Preparation Team will design and deliver training in risk management and anti-corruption, through workshops for all Project staff of all levels in component IAs financed under the supplemental PPF.</p>	PCO and Project Preparation Team with IDA guidance and overview.	<p>quarterly review.</p> <p>Training workshops to take place during DFGG pre-implementation stage when IA implementation teams are in place.</p>		<p>and submit the progress to the Bank as quarterly basis</p> <ul style="list-style-type: none"> Seek further technical assistance from the Bank team regarding the implementation of the GGF 		
8c. Promote synergy, cross-learning and constructive competition among components of the Project.	PCO to arrange quarterly workshops among component IAs to share experience of problems encountered by them, and effectiveness of solutions applied. The workshops would also enhance healthy competition among IAs in promoting effective project management and innovation in good governance.	PCO and all components IAs.	Quarterly. PCO to report on workshops to MOI and all components IAs, with copy to IDA, not later than two weeks after each workshop.	Dissemination workshop on sharing lesson learnt and experience has been implementing through LCFG workshop.	<ul style="list-style-type: none"> Continue using LCFG body to share lesson learnt, experience and successful case study among components of the Project. 		
8d. Strengthen oversight, monitoring and feedback on Project initiatives through demand-side social accountability.	Supplement the enhanced CSO role (item 4a) by engaging citizens and the media to monitor and provide feedback on the outputs and outcomes of project activities. Target youth explicitly as a group for promoting and monitoring project initiatives.	All IAs to organize working groups and design activity plans, with PCO coordination.	IAs to draft plans during DFGG pre-implementation stage. PCO to furnish copies to IDA. PCO to monitor implementation.	All IAs has set up their individual Partnership Plan as indicated in Annual Work Plan 2010 respectively.	<ul style="list-style-type: none"> The PCO is going to organize DFGG forum on December, 2010 Continue coordinating and supporting the 		

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	Organize internships, dialogue, training workshops and focus events to reach out to NGOs, CSOs and other civic groups to publicize the Project's work, e.g. a high profile nation-wide essay contest and art competition for youths on International Anti-Corruption Day (December 9) to solicit vision and ideas for the future.	All IAs to organize dialogue, training workshops and focus events, with PCO coordination.	IAs to draft plans during DFGG pre-implementation stage. PCO to furnish copies to IDA. PCO to monitor implementation.		IAs in organizing the training workshops and events		

