Standards of Good Governance & Professional Practices for NGOs in Cambodia

Fifth Edition, 2021
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Acronyms

CCC  Cooperation Committee for Cambodia
CSO  Civil Society Organization
GPP  Governance and Professional Practices
MoFA/IC  Ministry of Foreign Affairs and International Cooperation
MOI  Ministry of Interior
NCCC  NGO Code Compliance Committee
NGO  Non-Government Organization
SOP  Standard Operating Procedures
USD  United States Dollars
VMV  Vision, Mission & Values
Foreword

The Cooperation Committee for Cambodia (CCC) is a membership-based organization established since 1990 and currently has around 200 local and foreign non-governmental organizations as members. As a membership based organization, CCC works in inclusive partnership for good governance, an enabling environment for NGOs, and sustainability of the civil society organization in Cambodia.

CCC is proud to host the Governance and Professional Practices (GPP) certification system, which provides standards for how well-managed and responsibly-governed NGOs in Cambodia should operate.

The benefits of the GPP have been recognized by many stakeholders, including CCC members, government institutions and development partners. Additionally, the GPP certification system is also recognized by global platforms such as the Global Standard for CSO Accountability, Accountable Now, the Global Partnership for Effective Development Cooperation (GPEDC), the Affinity Group of National Associations (AGNA), and CIVICUS.

From its introduction in 2007 until 2018, the GPP system received 237 applications. By the end of 2019, 99 GPP certificates had been awarded to qualified NGOs by the NGO Code Compliance Committee (NCCC).

The GPP certification system is subject to review once every three to four years to expose the system to further improvement. Modifications to the codes and standards are made based on inputs from the NGO community and other stakeholders. CCC wishes to thank the many individuals and organizations which participated in the most recent review, including GPP-certified NGOs, applicant NGOs, the GPP Working Group, the NCCC, the GPP Small Advisory Group, and donor partners.

This new 5th (fifth edition) of the GPP modality responds to some important needs: to provide the NGO community a path to improved governance and professional practices that is more accessible, more flexible, more cost efficient, and more strongly owned by the NGO community.

The new GPP modality provides a step-by-step process towards certification, with greater emphasis on capacity development and on nurturing a Community of Good Governance and Professional Practices in order to strive together for transparency, accountability, and professionalism within the NGO sector in Cambodia.

Soeung Saroeun
CCC Executive Director
1st December 2019
History of the GPP Code

In 1995, the original “Code of Ethics for NGOs and People’s Organizations in Cambodia” was drafted by members of the CCC Executive Committee. The Code was translated from English to Khmer and further revised in cooperation with local NGO networks.

In 2004, CCC’s NGO GPP (which at that time stood for “NGO Good Practice Project”), in cooperation with the local NGO network of Star Kampuchea, began facilitating a review and revision of the Code of Ethics. The NGO GPP project also aimed to go one step further — to provide practical steps on how to put the principles of the Code into practice and to develop a set of “minimum standards” through consultations with the NGO sector throughout Cambodia.

In 2007, a pilot certification system was established. The certification system included guidelines and indicators for each of the minimum standards, tools and checklists for data collection, the establishment of a Working Group to do desk reviews of documents, and the convening of an NGO Code Compliance Committee to review the findings from the field assessment and award the GPP certificates. The NGO Good Practice Project, then in its second phase, served as the Secretariat and carried out the field checks required for certification.

In 2011, the NGO Good Practice Project was transformed into the “NGO Governance & Professional Practices” (NGO GPP) voluntary certification system, and a third edition of the GPP Code was produced. A fourth edition was released in 2014.

In 2018, a review of the voluntary certification system raised a number of issues, including the one-size fits all nature of the Standards, the one-step “pass/fail” system without recognition of milestones along the way, the mechanistic style of assessment, and the need for improving the quality of the assessment process. The review found that the GPP system is valued largely for its capacity development potential, including helping NGOs better assess their own governance and professional practices and how to improve; but this potential was not being sufficiently addressed. The new GPP Code and modality attempts to address these shortcomings. A consultancy in 2019 revamped the entire Code, in discussion with a wide range of stakeholders.

Introducing the New GPP Modality

The new GPP modality will commence in 2021. The year 2020 will be a transition year in which the GPP team will be restructured and strengthened. In 2020, existing applicants will be processed under the old GPP Code and modality, but no new applications will be accepted.

Features of the new GPP modality include: 1) creation of a Community of Good Governance and Professional Practices; 2) an (optional) capacity development component; 3) a revised GPP Code and means of assessment, including 3 Milestone Awards on the path towards full certification; and 4) a certification validity of 5 years (compared to the previous 3 years).

Fees apply to each step of the GPP process, as described in Annex 1.
1. Joining the Community of Good Governance and Professional Practices

The first step under the new modality is for interested NGOs to join the Community of Good Governance and Professional Practices (GPP Community). After joining the GPP Community, NGOs will be invited to collective learning and information sharing events, and will learn more about the capacity development and Milestone Awards available to GPP Community members.

To become a member of the GPP Community, the NGO first signs a declaration of good faith that it will strive to respect and practice norms of institutional good governance and professional practices. The declaration is a mutually binding agreement, which also binds the GPP team to provide ongoing technical support to the member in their journey towards improved governance and professional practices. An annual membership fee must be paid, as described in Annex 1.

Community members are offered opportunities for capacity development and certification through 3 separate milestone awards (for the principles of Good Governance, Good Resource Management, and Dynamic Program Practices respectively), as described below. Viewed from an organizational developmental lens, these 3 milestone awards aim to address formative, normative and performing developmental stages. However, the member may attempt to achieve the milestones in any order, according to their own preference.

New Modality as Progressive Organizational Developmental Journey

- **Board, management and staff are strongly committed to:**
  - 1. Inclusively develop Vision, Mission and Values;
  - 2. Uphold highest level of accountability and responsibility (internally and externally).

- **Forming: Attainment of Good Governance Award**
  - Board, management and staff are strongly committed to:
    - 1. Follow good program practices which aim to improve program effectiveness and impact;
    - 2. Assure that intended goals serve the public good.

- **Norming: Attainment of Good Resource Management Award**
  - Board, management and staff are strongly committed to:
    - 1. Ensure highest compliance to inclusively developed and regularly updated Standard Operation Procedures (SOPs) that meet ethical and legal standards;
    - 2. Assure that resources are delivered with the highest level of due diligence and financial accountability.

- **Performing: Attainment of Dynamic Program Practices Award**
2. Capacity Development in Preparation for Certification

To build capacity towards obtaining a Milestone Award, members of the GPP Community may request assistance from the GPP capacity development team. The capacity development team will provide the GPP Community member a workshop (normally of 2 days duration), focusing on a Milestone Award of the member’s choosing. The workshop includes:

a) Introduction to the Milestone Award, its purpose, and the rationale for each Standard contained within the Milestone.

b) Discussion on how the member may improve or build its capacity to meet the requirements.

c) Development of a plan on how the member will build its capacity.

d) Introduction to how to use this manual.

Self-assessment is an important part of a member’s preparation for applying for a Milestone Award. Whether or not the member requests assistance from the GPP capacity building team, all members are encouraged to conduct their own internal self-assessment to ascertain whether they are ready for certification; and if not yet ready, to further build their capacity as needed.

3. Applying for Milestone Awards and Certification

After a GPP Community member is confident of meeting the requirements of a particular milestone, they may apply for the relevant Milestone Award. Members that achieve one milestone become **Bronze** members of the GPP Community. If they simultaneously hold two Milestone Awards, they become **Silver** members. If they simultaneously hold three Milestone Awards, they become **Gold** members. Gold members are automatically given full GPP certification for a period of 5 years. For members that have not yet achieved full GPP certification, their Milestone Awards are valid for only 3 years from the date they were obtained, after which they need to apply for the Milestone Award again for it to remain valid.

When applying for a Milestone Award, the member must first submit their self-assessment for the “Existence and Accessibility Indicators” and all supporting documents to demonstrate proof that required documents/policies do really exist and are easily accessible by relevant audiences. Details of what is required is provided in the GPP Toolkit.
The submitted documents will be assessed in a desk review, after which the GPP certification team will conduct a field visit and interviews to assess the “Knowledge and Practice Indicators.” The field assessment team will meet groups of staff, the management, the board of directors, beneficiaries, and partners (donor and/or government) of the applicant NGO. The desk review and field assessment are submitted to the NGO Code Compliance Committee (NCCC) for decision. Successful applicants will be given a award/certificate and invited to attend an Awards Ceremony.

4. Responsibilities of Award Holders and Certified NGOs

Maintaining standards of good governance and professional practices is an ongoing endeavor. Award holders and Certified NGOs remain part of the Community of Good Governance and Professional Practices and will be invited to regular collective learning and information sharing events. Occasionally, they may be invited to showcase their achievements under the GPP program to donor organizations.

Award holders and Certified NGOs are required to submit each year an annual GPP report, as well as any new policy that they develop. The GPP certification team will conduct at least two regular follow-up visits per year and spot checks to assess continuing compliance with the Standards. If it appears that the award holder or certified member has not maintained all of the Standards, formal investigations will take place to further determine whether the member should be de-certified. Any alleged cases of corruption will be investigated promptly, and offenders may be suspended or dismissed from the GPP Community.

5. Transition from Old to New Modality

After the new GPP modality commences in January 2021, NGOs certified under the old system have two options. The first option is to request upgrading to the new modality, which will extend their existing 3-year certification by another 2 years (5 years certification in total) and provide them Gold member status. To upgrade their existing certification, they will be tested only on new requirements not covered under the previous Code. The second option is to continue with their existing 3-year certification and apply for milestone awards and certification under the new system when they are ready. Similarly, NGOs that already submitted an application under the old system may continue under the old system or transition to the new system.

6. The Global Standard for CSO Accountability

The GPP program under CCC is privileged to be one of nine established CSO accountability initiatives around the world that contributed to the Global Standard for CSO Accountability. The Global Standard provides guidance on CSO approaches to justice and equality, women’s rights and gender equality, environmental protection, and lasting positive change. Its focus on ethical commitments and approaches to development complements the measurable standards for professional practice contained within the Cambodian GPP Code. Unlike the GPP Code, the Global Standard is not designed to be a tool for assessment and certification. It is, however, an important tool for learning and organizational development within the GPP Community. More information about the Global Standard is provided in Annex 2.
The Code’s Principles and Standards

The Code's Principles each have a set of associated Standards which members of the Community of Good Governance and Professional Practices aspire to achieve. Once the member achieves all Standards associated with the Principle, the member is eligible for a Milestone Award.

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<tr>
<th>PRINCIPLES</th>
<th>STANDARDS</th>
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<td>1. Good Governance</td>
<td>1.1 The organization has clearly defined vision, mission and values, which are known to and understood by the staff and governing body.</td>
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<td>1.2 The organization regularly reviews the consistency of its mission and program activities.</td>
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<td>2. Good Resource Management</td>
<td>1.3 The organization is registered with relevant ministries.</td>
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<td>1.4 The organization has a functioning governing body (by whatever name).</td>
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<td></td>
<td>1.5 The organization is non-profit and adheres to clear written statutes, by-laws or memorandum of understanding.</td>
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<td>1.6 The organization develops and reviews all organizational key policies, using a participatory approach, and the policies are approved by the governing body.</td>
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<td>1.7 The organization regularly shares relevant information with staff.</td>
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<td>1.8 The organization has a written policy dealing with corruption and conflict of interest.</td>
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<td>1.9 The organization provides appropriate information on its governance, finance, and program/s, to external stakeholders and the public.</td>
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1. Good Governance

An important characteristic of dynamic, effective and transparent organizations is an effective governance structure. The governing body keeps the organization focused on its vision, mission and goals, and ensures that the organization operates under a transparent “rule of law” through approving policies that guide the organization’s conduct. Staff are involved in updating these key governance documents to ensure they remain relevant and appropriate.

2. Good Resource Management

Good resource management entails acquiring, managing and reporting on resources ethically and responsibly. Funds and resources entrusted to the organization need to be properly controlled and managed. This can best be achieved when the organization manages and supports employees fairly and effectively in line with its legal responsibilities and accountability as a responsible employer.
3. Dynamic Program Practices

A proactive, responsive and inclusive management structure and style, which utilizes participatory monitoring and evaluation practices, form the fundamental backbone of a sound organization. Such a system engenders self-reflection and responsive relationships with external stakeholders in order to formulate context-relevant and dynamic results-based interventions and program strategies.

The Code’s Rationale and Indicators

The Code provides a Rationale on the purpose of each of the Code’s Standards, plus Indicators through which members of the Community of Good Governance & Professional Practices may be assessed.

1. Good Governance

**RATIONALE**

**STANDARD 1.1: The organization has clearly defined vision, mission and values, which are known to and understood by the staff and governing body.**

Dynamic and well-governed organizations are typically guided by clearly-defined vision, mission and value statements, which are devised in a participatory process. Typically, both the staff and the board may contribute to devising these statements.

A *vision statement* should define the long-term goal or vision for society to which the organization contributes. It serves as a source of inspiration for the staff and other stakeholders.

A *mission statement* should define why the organization exists. It is a broad, strategic statement of the organization’s identity, goals, attitudes and outlook. It serves as a focus point through which the organization and its stakeholders can

**INDICATORS**

1.1.1 The vision and mission statement and organizational values are clearly written in any of the key documents such as:
   a) Charter/bylaws
   b) Annual report, and/or
   c) Strategic plan

1.1.2 More than 80% of management staff and ordinary staff members interviewed are able to:
   a) Clearly interpret the organization’s vision, mission and values (VMV);
   b) Explain and demonstrate how they use the VMV to guide their decisions and activities.
**RATIONALE**

share a common purpose. It should be brief and to the point, and easily understood.

A *values statement* should express what an organization believes in. It guides the staff, management and leadership of the organization in performing their duties.

The vision, mission and values (VMV) are long-term statements which should be approved by the Board.

The VMV should be promoted among the staff, for example through the orientation of new staff members, through staff meetings, and during performance appraisals. Staff members should understand and use the VMV to guide the organization's decisions and activities.

**STANDARD 1.2: The organization regularly reviews the consistency of its mission and program activities.**

Mission statements are intended to keep organizations properly focused on their stated purpose. Program activities should be consistent with the organization’s mission. Both the staff and the governing body should periodically check that this is the case.

The best time to conduct such a review may be during the organization's annual staff reflection meetings, during development of project proposals, and/or during the organization's strategic planning process.

A *strategic plan* should at least include: vision, mission, values, strategic goals, situation analysis, strategic objectives/outcomes, intended partners/beneficiaries, target location and timeframe. Strategic planning is best conducted with participation from the governing body, and looks at both internal and external factors that may impact on the future plans of the organization.

For some small organizations, their project proposal may serve as their strategic document. For other organizations, the strategic plan serves as a guide to the preparation of project proposals to multiple funding sources.

International/foreign NGOs may have strategic plans at the international level. In such cases, the local program staff must be at least aware of the plans and understand them. In many cases, international/foreign NGOs will also have strategic plans at the country level, devised with input from local staff, and aligned with their international strategy.

**STANDARD 1.3: The organization is registered with relevant ministries.**

To operate legally, all organizations is required to register

**INDICATORS**

1.1.3 More than 50% of governing body members express that they understand and approve the organization’s vision, mission and values. (Does not apply to international/foreign NGOs whose governing body exists outside Cambodia).

1.2.1 The organization provides meeting minutes, strategic plan, or other document which shows that they have reviewed the consistency of their mission statement and current program activities.

1.2.2 More than 50% of interviewed program staff, management staff, and governing body members can describe their involvement in the strategic planning process and or strategic plan review and how the plan reflects the organization’s mission. (In the case of international/foreign NGOs with a strategic plan set at international level, staff have at least been informed of the strategy).

1.2.3 A well-formulated 3-5 year strategic plan for the organization is made available and used to guide program implementation. (For smaller organizations with budget less than $200,000 per year, the strategy may appear within their proposal documents).

1.3.1 The organization has a valid registration document(s) from the relevant ministry(ies) which are
with the appropriate government ministry and/or department. Unregistered organizations risk being closed down by authorities, impacting on the organization’s beneficiaries, staff and donors.

In Cambodia, local NGOs register with the Ministry of Interior (MOI), while international NGOs register with the Ministry of Foreign Affairs and International Cooperation (MoFA/IC). International/foreign NGOs must also have an agreement with a line ministry.

The recognition letter(s) from the relevant government authorities should be shared publicly, including to local authorities and beneficiaries that the organization works with.

The organization must inform the MOI or MoFA/IC when its Executive Director (or equivalent) is changed. Local NGOs should also inform the MOI of a change in Board members.

**STANDARD 1.4: The organization has a functioning governing body (by whatever name).**

A properly governed organization normally has an independent governing body (usually called a "board") which oversees the organization’s management, fiduciary responsibility, and fulfilment of its vision and mission.

The governing body will normally have at least five members. The members are expected to be independent from the organization and to not receive payment for their services. Board members may be selected for their skills and knowledge, their commitment to the mission and values of the organization, and with consideration to gender balance.

The organization should have by-laws or other documents that explain the functioning of the governing body, including:

a) How many members are required for quorum;

b) How often the governing body should meet;

c) How members are selected or removed;

d) The main responsibilities of the governing body.

The responsibilities of the governing body may include: recruiting, advising, appraising and potentially dismissing the Executive Director; establishing or endorsing organizational policies; reviewing progress reports and assessments of the organization’s operations; and approving the strategic plan, annual budgets, work plans, reports, audits, external evaluations, and major proposals.

International/foreign NGOs typically have governing bodies in their countries of incorporation, but no comparable body at the country level.

**INDICATORS**

available at the organization's office and acknowledge that the organization is registered in accordance with the laws of Cambodia.

1.3.2 The organization has written evidence that notification of a leadership change has been filed with the relevant government body.

1.4.1 The by-laws or terms of reference of the governing body at least state how often the governing body meets, how it is selected, the quorum for decision making, and its role in approving policies, approving the strategy, approving budget, and recruiting, appraising, and potentially dismissing the Executive Director.

1.4.2 A structure of the governing body and list of members is made available (with at least three current members).

1.4.3 More than 50% of governing body members are able to explain their roles and responsibilities. (Does not apply to international/foreign NGOs whose governing body exists outside Cambodia).

1.4.4 The governing body meets a minimum of two times per year with sufficient quorum, a clear agenda, and meeting minutes. (Does not apply to international/foreign NGOs whose governing body exists outside Cambodia).

1.4.5 The decisions from the governing body meeting are acted upon in a timely manner. (Does not apply to international/foreign NGOs whose
**RATIONALE**

**STANDARD 1.5: The organization is non-profit and adheres to clear written statutes, by-laws or memorandum of understanding.**

"Non-profit" organizations are dedicated to furthering a particular social cause and, unlike companies, do not distribute their profit to shareholders or other persons or entities. The organization’s resources are fully devoted to achieving the mission of the organization. The organization may have income generating activities to help fund its work, but if so must follow the requirements of the Taxation Department regarding how such activities are reported and taxed, and may be required to register these business activities as a social enterprise.

Statutes or by-laws are internal documents; a set of rules that enable each organization to conduct its activities. They form the core of an organization’s identity and structure, provide a basis for building the organization’s identity, and provide a basis for trustworthy relationships with other organizations. They are a critical pre-requisite for an organization’s registration with official authorities. They should be written clearly and in language that is easily understood by all of the organization’s stakeholders.

In Cambodia, government authorities may require local organizations to use a standard format for the by-laws which in some cases do not fully describe the organization’s structure, processes and the responsibilities of the governing body. In such cases, the governing body may need to approve additional internal governance rules and procedures for its own use.

The statutes, by-laws, and/or other internal governance documents may clarify: the name and purpose of the organization; the frequency, notice, and quorum requirements for the governing body; the number of persons in the governing body, the length of their term, the scope of their authority, the method of their nomination and election to the governing body, and provisions for filling vacancies; the title and scope of authority of the Executive Director (or equivalent); record-keeping and financial reporting responsibilities; amendment procedures for the by-laws; and provisions for dissolution of the organization.

The governing documents will typically state that the organization is non-profit and is not politically affiliated. They may also state that if the organization closes/dissolves then any remaining property or resources will be distributed to

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<tr>
<td><strong>1.5.1</strong> The organization has statutes or by-laws, which define the organization’s purpose and non-profit status. (International/foreign NGOs must also have a Memorandum of Understanding with relevant government bodies).</td>
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<tr>
<td><strong>1.5.2</strong> More than 80% of interviewed staff members and members of the governing body show a thorough understanding that the activities/projects/programs of the organization are not undertaken for a profitable purpose.</td>
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<td><strong>1.5.3</strong> Examination of the financial reports and policies show that there is no sharing of profit to staff, members of the governing body, or other persons or entities.</td>
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RATIONALE

another non-profit organization working in a similar sector.

The statutes, by-laws, and/or other internal governance documents should be developed, reviewed and approved by the governing body. When members of the governing body change, new members should familiarize themselves with these documents.

International/foreign NGOs typically have statutes or by-laws in their countries of incorporation, but no comparable document at country level. However, they required to have a Memorandum of Understanding with the Ministry of Foreign Affairs and International Cooperation which authorizes the organization to operate in Cambodia for humanitarian purposes, and an agreement with a line ministry related to the sector in which they work.

STANDARD 1.6: The organization develops and reviews all organizational key policies, using a participatory approach, and the policies are approved by the governing body.

An organization’s internal policies guide the actions of the organization and its staff, and create a consistent “rule of law” within the organization that all can understand and follow.

All organizations should have a personnel policy, a finance policy, and policies dealing with conflict of interest, anti-corruption, child protection, and gender equity, as well as relevant procedures and guidelines. These policies, procedures and guidelines may all be placed together in a standard operating procedures (SOP) manual, or similar document.

Ideally, policies are developed, and periodically reviewed and revised, using a participatory approach involving the organization’s staff. However, it is the role of the governing body to review and to approve the organization’s policies, to ensure that they align with the mission and values of the organization.

Smaller organizations may involve all staff in policy reviews, while larger organizations may involve a selection of staff. International organizations may have policies devised and approved at headquarters level. In all organizations, staff must be aware of and understand their responsibilities and rights under these policies.

More information on the required content of the above-mentioned policies is provided under the “Good Resource Management” Code, Standards 2.2 and 2.3.

INDICATORS

1.6.1 Staff are given the opportunity to participate, or provide comments on the development and/or revision of organizational policies and procedures as reflected in meeting minutes. (For international/foreign NGOs with policies determined at international level: staff are fully informed of organizational policies and procedures, as reflected in meeting minutes, staff evaluation documents, or recruitment documents).

1.6.2 More than 50% of interviewed management and ordinary staff members are able to talk about the process of organizational policies and procedures in which they have been involved in developing and/or revising. (For international/foreign NGOs with policies determined at international level: management and ordinary staff members are able to talk about the process whereby organizational policies and procedures were introduced to and discussed by staff).

1.6.3 The governing body has approved key policies including at least a personnel policy and finance policy.

1.6.4 More than 50% of interviewed members of the governing body are able to talk about the process of providing feedback and approval of the
**RATIONALE**

**STANDARD 1.7: The organization regularly shares relevant information with staff.**

The flow of information to staff is critical to the proper functioning of a participatory and well-managed organization. The organization may share information with staff members through a variety of methods, for example: through regular staff meetings, information boards, online sharing, etc.

Staff meetings must be conducted regularly, and should be well-documented. The purpose of these meetings is to share any organizational progress and/or changes that may impact upon the staff and to collect feedback and act upon feedback if deemed justified and necessary. The agenda may include updates on income and funding sources, the progress of and challenges faced by the program, and plans for the next quarter.

Relevant information that should be shared with staff include: annual/semester/quarterly reports, funding information, updates on project/program activities, and information from network meetings.

**STANDARD 1.8: The organization has a written policy dealing with corruption and conflict of interest.**

The organization needs to guard against corrupt practices to ensure that the organization’s funds are used for the purposes intended, to ensure that employees and board members maintain a standard of honesty and transparency in their work, and to uphold the good reputation of the organization. Employees and board members should not be involved in paying bribes or accepting any bribe, kickback or other unlawful payment or benefit to secure favorable treatment from the organization.

The organization and its staff should also avoid *conflicts of interest*. A conflict of interest occurs when a person is in a position to derive personal benefit (for themselves or others) from actions or decisions made in their official capacity. Conflicts of interest may also arise from any official role played by the employee or board member outside the organization which is contrary to the mission and values of the organization. The holding of office in a political party may be in conflict with the organization’s non-partisan NGO status.

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**INDICATORS**

- **organizational policies. (For international NGOs: Management staff can describe the process by which the policies were introduced to and discussed with staff).**

  1.7.1 Staff meetings (all-staff meetings or separate team meetings) are held regularly to provide and receive feedback and the minutes are properly filed and available.

  1.7.2 More than 50% of interviewed staff members are able to describe issues discussed in the staff meetings and have access to meeting minutes.

  1.8.1 The organization has policy/ies covering conflict of interest and corruption which are approved by the governing body (or by the management in the case of international/foreign NGOs).

  1.8.2 This policy is made available to all staff, and at least 80% of interviewed staff are aware of its contents.
RATIONALE

"Nepotism" may arise from a conflict of interest, where persons in authority favor relatives or friends, for example by favoring them in recruitment processes.

To avoid conflicts of interest resulting from familial ties, organizations should avoid employing persons related to each other, especially in cases where one will fall under the management line of the other. Relatives include: spouses, parents, siblings, nephews/nieces, cousins, aunts and uncles.

The organization may have a specific policy on corruption and conflict of interest, or these issues may be covered by the organization’s personnel and financial policies. The policy may include a “whistleblower” procedure through which persons may anonymously report a violation of the policy or other misconduct and be protected from having their identity revealed.

STANDARD 1.9: The organization provides appropriate information on its governance, finance, and program/s, to external stakeholders and the public.

Open organizations are transparent about their work and their identity. They share relevant information responsibly with people, partners and the public. This transparency allows others to engage in constructive dialogue and to participate in the organization’s work, so that the organization can learn and improve. CSOs that embody transparency not only strengthen their own work but also justify the trust and confidence put in them and the civil society sector as a whole, contributing to the preservation of civic space.

To achieve this, it is recommended that the organization conduct annual progress update briefings with its target communities and other stakeholders, including donor partners where possible. At these briefings, the organization should share relevant information, including its public reports, funding information, project results and future plans.

The organization may also participate in networks to improve coordination, disseminate information, and share experiences and good practices with all stakeholders and beneficiaries.

INDICATORS

1.9.1 At least 60% of the organization’s development partners, target beneficiaries and/or relevant government officials who respond to GPP enquiries are satisfied with information shared by the organization.

1.9.2 The organization’s annual report and/or other public reports are made available through at least one of the organization’s public information outlets, such as website, resource center, office, etc.
2. Good Resource Management

**RATIONALE**

**STANDARD 2.1:** The organization’s financial accounts are audited by an acceptable auditing firm or equivalent body.

An *audit* of the organization’s accounts provides reasonable assurance about whether the organization’s financial statements are free from material misstatement, whether due to fraud or error. By providing this independent assessment, public and donor confidence in the organization’s financial reporting is enhanced. The auditors should also provide the organization’s management with *Management Letter* that outlines any weaknesses found in the organization’s internal controls and implementation, with recommendations for improvement.

In some cases, donors providing small grants to small organizations do not provide any budget for an audit, but do their own checking of the organization’s accounts. This may substitute for an audit if carried out thoroughly, and if the organization acts on any weaknesses found in the organization’s internal controls and implementation.

According to Cambodian law, any organization meeting two of the following criteria must have an external audit: 1. Annual turnover of at least 2,000,000,000 riel (approximately USD 500,000) 2. An annual average of 20 or more employees. Auditing firms in Cambodia should be approved by the National Accounting Council. Other standards may apply to the worldwide audits of international/foreign NGOs registered in other countries.

The audit should note any non-compliance with taxation requirements, including salary tax and withholding tax. The Taxation Department may also consider income generation activities to be a business and subject to taxation as a business.

While donors may only require project audits of the specific projects they are funding, the organization should also consider conducting an annual organization-wide financial audit. An organization-wide audit ensures that all aspects of the organization’s finances are reviewed, and that there is no double counting of expenses under different projects.

Audited financial statements and management letter(s) should be broadly shared internally and recommendations should be acted upon in a timely manner.

**INDICATORS**

2.1.1 The organization audits its accounts at least annually.

2.1.2 The governing body, relevant staff and management are fully informed of audit reports and recommendations.

2.1.3 Audit and donor recommendations regarding the organization’s accounting are addressed in a timely manner with written documentation to prove action.
RATIONALE

STANDARD 2.2: Comprehensive and appropriate financial policies and practices are in place to ensure that funds and resources entrusted are properly controlled and managed.

The efficient, effective and ethical use of financial and other resources is essential for organizations to manage programs, achieve results and to develop and justify trust from stakeholders. Organizations should therefore follow generally recognized financial accounting standards.

Ideally, financial responsibilities should be handled by competent and qualified staff who can interpret and assure policy compliance without undue pressure from the senior management or other persons. The tools used to exercise this function are written policies and procedures. The tools can be used to review the organization’s financial performance and financial position. At a minimum, an accounting system should be adopted that is appropriate to the organization’s operational size, which meets legal and structural requirements, and which is suitable for the scale, capacities and risks of the organization.

Financial accounts are best recorded in a computerized accounting package rather than a spreadsheet, as spreadsheets do not provide the same amount of control and more data errors may result. Ideally, the system should be able to give detailed accounting records that are structured to enable forecasting, measurement and review of income, expenditure, assets, liabilities and equity. Key elements of the financial policies and procedures should contain generally recognized fundamental elements of good accounting practice, such as segregation of duties, use of chart of accounts, and rules for asset management and procurement.

The financial rules and procedures should be regularly reviewed with the participation of relevant staff to meet the evolving needs of the organization. Regular analysis of internal systems is needed to identify aspects that need to be updated.

Where practicable, measures should be taken to assure adequate financial reserves, to protect staff and beneficiaries in the event of reduced funding, funding delays, or cash flow problems. The organization should try to develop strategies for financial sustainability; for example, by having diverse funding sources.

STANDARD 2.3: The organization has clearly written policies and procedures to support and manage its human resources fairly, transparently and in an accountable manner.

Effective organizations need qualified and committed staff who have the motivation and professional capacities to drive

INDICATORS

2.2.1 The financial policies and procedures are well documented and available to all staff members, and include procurement procedure, level of authorization, internal control system, asset management, official currencies, cash advance and settlement, and financial reporting requirements.

2.2.2 The financial policies and procedures are available to all staff and at least 80% of interviewed management and finance staff can demonstrate understanding of financial policies and procedures that are relevant to their own work.

2.2.3 The organization complies with the financial policies and procedures.

2.2.4 More than 80% of interviewed management, finance and other key staff can explain how they ensure that the financial policies and procedures are properly followed and can withstand any financial wrongdoings, especially fraud, corruption or negligent use of resources.

2.3.1 The organization has a Personnel Policy, containing at least a code of conduct, recruitment/contracting policies, staff appraisal process, disciplinary and termination policies.
RATIONALITY

effective processes and achieve common goals. Professional, well-equipped, and loyal staff and volunteers improve the quality of an organization’s work and reduce risks of mismanagement. To achieve this, CSOs must have transparent and fair principles, policies and procedures for recruiting, developing and managing staff.

All organizations should have a personnel policy and policies dealing with conflict of interest, anti-corruption, and gender equity, as well as relevant procedures and guidelines. Where relevant, some organizations may also have a child protection policy. These policies, procedures and guidelines may all be placed together in a standard operating procedures (SOP) manual, or similar document.

The personal policy should at least meet the local minimum requirements of the Cambodian Labor Law pertaining to rights of employees and obligations of employers. The policy should describe the organization’s structure and core mission and contain the code of conduct, recruitment/contracting policies, staff development policies, and other relevant policies and procedures that are deemed to be supportive of and can assure staff welfare through good management.

To ensure good governance and prevent abuses, the SOP should contain policies on handling conflict of interest, staff behavior (including sexual harassment), child protection, gender/minority equity, anti-corruption, safe whistleblowing, grievance procedure, and sensitive data protection. Ideally, the SOP should also contain policy provisions preventing staff posting on social media information or opinions that may be damaging to the organization. These may be separate policies or contained within the personnel and finance policies.

While some policies apply specifically to staff, others (e.g. anti-corruption clauses) may also apply to recipients of the organizations resources. The relevant staff, beneficiaries and other stakeholders must be fully informed of the policies, rules and procedures which apply to them.

STANDARD 2.4: All employees have valid contracts and job descriptions setting out clear roles and responsibilities.

A proper employment contract is legally required and is beneficial to both the employee and the employer. It specifies the rights and obligations of both parties, protects the job security of the employee, and protects the employer from certain risks such as the release of confidential employer information. Staff contracts and entitlements should be compliant with relevant Cambodian laws, especially the Cambodian Labor Law.

A clear job description helps employees to understand their

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<tr>
<th>INDICATORS</th>
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<tbody>
<tr>
<td>2.3.2 The organization’s policies include policy provisions pertaining to staff misbehavior (including sexual harassment), child protection, gender/minority equity, anti-corruption, safe whistleblowing, grievance procedure, and sensitive data protection.</td>
</tr>
<tr>
<td>2.3.3 The above mentioned policies are accessible to all staff members, and at least 50% of interviewed staff are able to describe most of the above-mentioned policies.</td>
</tr>
<tr>
<td>2.3.4 The above-mentioned policies are properly applied and followed.</td>
</tr>
<tr>
<td>2.3.5 The contents of the Personnel Policy clearly describe personnel procedures, obligations and entitlements, which meet or exceed the local labor law requirements.</td>
</tr>
<tr>
<td>2.3.6 More than 80% of interviewed staff members are able to describe key elements of the personnel policy relevant to their work.</td>
</tr>
</tbody>
</table>

| 2.4.1 All employees have legally compliant contracts of employment. |
| 2.4.2 All staff have legally valid job descriptions, including job title, location, reporting line, job summary, responsibilities, and required qualifications (education, and experience). |
| 2.4.3 More than 80% of interviewed employees are able to clearly describe procedures, staff benefits, and staff development. |
RATIONALE

responsibilities and duties, and provides a benchmark against which their performance can be reviewed. The organization must develop clear job descriptions for all employees. To be legally compliant, the job description should include: job title, location, reporting and management line, a summary, detailed list of responsibilities, and the qualifications (education and experience) required for the job.

STANDARD 2.5: An annual performance appraisal is conducted for every employee.

Performance appraisal is the systematic evaluation of the performance of employees, with a view to improving their work performance and providing avenues for further growth and development. It provides employees an opportunity to demonstrate their achievements, and may motivate employees to improve their performance. It provides supervisors an opportunity to assess and appreciate the skills and achievements of subordinates. Ideally, this two-way communication between supervisor and supervisee creates a degree of mutual and reciprocal trust and confidence.

Performance appraisal systems involve setting performance standards and comparing employees’ actual performance against the standards. Through this process, managers and their subordinates can share their understanding about what has to be done next. This should include identifying opportunities for staff capacity development (either on-the-job or externally sourced). The performance appraisal should take place at least annually, and the results of the appraisal should be kept in the staff files.

Similarly to the staff, the performance appraisal of the Executive Director should be conducted by the governing body.

INDICATORS

2.5.1 Performance appraisal forms and procedures are in place and all employees are appraised at least annually.

2.5.2 All employees have their performance appraised at least annually.

2.5.3 The result of performance appraisals are available to relevant employees, and are properly filed and confidentially maintained.
3. Dynamic Program Practices

**RATIONALE**

**STANDARD 3.1: The organization conducts regular monitoring and evaluation of its program/projects.**

Monitoring and evaluation are critical for feedback on project performance, for adjusting activities to current realities, and for accountability to funding agencies and stakeholders.

*Monitoring* is the systematic and routine collection of information from projects and programs to learn from experiences and to adjust activities to current realities. Monitoring tools may include logical frameworks, annual operational plans, checklists, project reports, and data collection tools. Beneficiaries and other stakeholders should also be provided opportunities or mechanisms for providing other feedback on the program, and for raising complaints or concerns.

*Evaluation* is a systematic assessment of a project’s, program’s or organization’s relevance, effectiveness, efficiency, impact, and/or sustainability, and is normally carried out at the end point of a project phase by external specialists. A variety of data collection methods and tools may be used, both qualitative and quantitative. The organization may also carry out internal evaluations, with participation of beneficiaries and stakeholders, on an annual basis or at the mid-term of the project.

The organization should continually reflect on its progress, and make improvements to its program and projects based on the findings and recommendations of its monitoring and evaluation. The organization should share the results of evaluations, both internally and with relevant external audiences, including donors and beneficiaries. Following an evaluation, the organization should consider the evaluator’s recommendations and prepare an implementation plan. The evaluation’s findings should also be taken into account when planning a new project phase.

**STANDARD 3.2: The management staff’s decision-making process is inclusive, participatory and well documented.**

Ideally, an organization should be led by a management body in which team members have clear roles and responsibilities, outlined in a clear terms of reference. The management team exists to provide strategic and operational management of the entire organization.

The management team’s terms of reference may typically include: the membership of the management team, the responsibilities of members, the decision-making process, and

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<tr>
<th>INDICATORS</th>
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<tr>
<td><strong>3.1.1</strong> M&amp;E tools and systems for program/projects are developed with participation of program staff and implemented with relevant stakeholders.</td>
</tr>
<tr>
<td><strong>3.1.2</strong> Internal and/or external evaluations on program/projects are produced, are available to internal and relevant external audiences, and an implementation plan is developed.</td>
</tr>
<tr>
<td><strong>3.1.3</strong> Beneficiaries and other stakeholders are provided opportunities or mechanisms for providing feedback on the program and for raising complaints or concerns.</td>
</tr>
<tr>
<td><strong>3.2.1</strong> Roles and responsibilities of the management structure (management team) are explicitly expressed in their job description and/or in stand-alone terms of reference.</td>
</tr>
<tr>
<td><strong>3.2.2</strong> The management team meeting minutes are available.</td>
</tr>
<tr>
<td><strong>3.2.3</strong> The decision making process and management’s style is inclusive and...</td>
</tr>
</tbody>
</table>
**RATIONALE**

the frequency of meetings.

In terms of day-to-day practice, the management team should meet regularly (subject to its own internal rules) to assure the proper implementation of core tasks such as: management oversight of projects/programs and operational matters; taking necessary steps to address recommendations from auditors, donors, and evaluators; and responding to decisions of the governing body. Decisions of the management team should be shared with staff members after the meetings.

**STANDARD 3.3: Resource mobilization tools, including fundraising proposals, publications, and online information, accurately describe the organization’s identity, purpose, programs and scope of achievement.**

Fundraising is an important part of an organization’s work, but needs to be done ethically and honestly. Fundraising tools should provide an accurate and honest representation of the organization, which matches the current planned activities. The organization should refrain from creating fiction, misrepresenting its beneficiaries, or describing beneficiaries in ways that may endanger the people they are portraying. Prior and informed consent of persons photographed or quoted should be obtained prior to publication and public distribution, including the consent of children and their parents or guardians.

Funding proposals need to accurately represent the context, problems identified, and proposed solutions and activities. They should avoid exaggerations, omissions, and misleading visual portrayals aimed at attracting the donor’s attention.

The organization’s funding status should be shared periodically with staff to ensure that staff have a good understanding of the organization’s funding sources.

Where the organization runs a business for the purpose of raising funds for the organization, the organization may need to register the business as a social enterprise and pay associated taxes.

**INDICATORS**

- **3.3.1** Project/program proposals accurately describe the program’s purpose, strategies, expected outcomes, key activities, target beneficiaries, and budget.

- **3.3.2** Fundraising communication tools and practices provide accurate and respectful information about their target beneficiaries.

**STANDARD 3.4: The organization builds and nurtures collaborative partnerships with like-minded organizations.**

Strong partnerships are crucial for organizations to fulfill common goals and objectives. Collaboration and coordination with other actors helps the organization to adopt a more holistic approach, identify gaps and to prevent duplication of efforts. The combined strengths and perspectives of different organizations can help to accomplish goals more efficiently and with greater impact.

- **3.4.1** The organization cooperates in partnership with other organizations to achieve common goals.
**RATIONALE**

Lasting positive change requires civil society organizations to undertake long-term strategies in partnership with other actors and organizations. A long-term and inclusive approach that addresses the root causes of current problems and that focuses on achieving sustainable impacts will contribute to increasing the trust in and the legitimacy of civil society organizations.

**STANDARD 3.5: The organization has good and supportive internal relationships.**

Good, supportive internal relationships are essential to the smooth functioning of an organization. The organization needs to take time to reflect on staff working relationships, build teamwork and create a cooperative working environment.

The management team should role model a high degree of professionalism, with personal qualities such as trustworthiness, honesty and openness. Such a management style is essential to fostering a good working environment and a culture of openness which promotes good team work and harmonious working relationships at all levels, including staff, volunteers, management, and board.

**STANDARD 3.6: The organization ensures the participation of the target groups/population in the project/program development processes.**

A major goal of development work is to empower communities by reducing their state of powerlessness, rights denial, and poverty entrapment. As such, participation of target beneficiaries at various (if not all) stages of the project/program development process is not just important but critically necessary. This may include the participation of target beneficiaries in the initial assessment, planning, implementation, monitoring and evaluation of the project.

This approach to development work enables shared ownership of decisions. The goal of participation is an empowerment process which enables people to handle challenges themselves and to influence the direction of their own lives.

Ownership and control of the project/program development process should be well documented in proposals and reports, and easily verified by internal and external evaluators.

<table>
<thead>
<tr>
<th>INDICATORS</th>
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<tbody>
<tr>
<td>3.5.1. More than 80% of staff interviewed express that the senior organization leaders are trustworthy, honest and respected.</td>
</tr>
<tr>
<td>3.5.2. More than 80% of interviewed staff are satisfied with the working environment in their organization.</td>
</tr>
<tr>
<td>3.5.3. More than 80% of interviewed staff have trusting relationships with other staff and managers.</td>
</tr>
<tr>
<td>3.6.1. The implementation of the project uses a participatory engagement process, including reviewing the project with target groups/population.</td>
</tr>
<tr>
<td>3.6.2. At least 60% of interviewed beneficiaries can describe their involvement in at least one stage of the project/program development process.</td>
</tr>
<tr>
<td>3.6.3. Target community and stakeholders participation is described in the annual report and/or other relevant documents.</td>
</tr>
</tbody>
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Annexes

Annex 1: Schedule of Fees

Only part of the cost of the GPP service to members is directly funded by donors. Member fees demonstrate ownership and commitment to the GPP process. The previous fee structure has been revised to take into account the new modality, which breaks the path to certification into 3 milestones. The fees include annual membership fees, award application & processing fees, and capacity development fees.

Fees are pro-rated according to the size of the NGO’s current annual budget, and are non-refundable.

*All full members of CCC will be offered a block discount of 25% on membership and award processing fees.*

### 3.1. Annual Membership and Award Application/Processing Fees

The *membership fee* applies to all members of the GPP Community. Fees shall be paid upon entry into membership, and annually thereafter.

The *award application/processing fee* applies to all members of the community whose application for a Milestone Award is accepted. Fees shall be paid once the processing of the application is initiated. Each Milestone Award is billed separately, even if the member applies for all 3 awards simultaneously.

<table>
<thead>
<tr>
<th>Current NGO Budget size</th>
<th>Annual Membership fees (USD)</th>
<th>Award Application/Processing Fee (USD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Below 50,000</td>
<td>20</td>
<td>100</td>
</tr>
<tr>
<td>50,001 to 150,000</td>
<td>100</td>
<td>100</td>
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<tr>
<td>150,001 to 200,000</td>
<td>150</td>
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<tr>
<td>200,001 to 499,999</td>
<td>200</td>
<td>200</td>
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<tr>
<td>500,000 to 999,999</td>
<td>250</td>
<td>250</td>
</tr>
<tr>
<td>Over 1,000,000</td>
<td>300</td>
<td>300</td>
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### 3.3. Capacity development workshop

Members who opt to receive assistance from the GPP capacity development team shall pay for the service provided, based on the number of days and trainers required. Fees shall be agreed by mutual consent based on prevailing market rate.
Annex 2: The Global Standard for CSO Accountability

The GPP program under CCC is privileged to be one of nine established CSO accountability initiatives around the world that contributed to the *Global Standard for CSO Accountability*. The Global Standard is a reference standard which aims to strengthen alignment across accountability standards and practices around the globe. It is not intended to replace them. The Global Standard consists of 12 “commitments” grouped into 3 clusters as follows:

**The Commitments**

**Cluster A: WHAT WE WANT TO ACHIEVE**
1. **Justice and equality**
   We will address injustice, exclusion, inequality, poverty and violence to create healthy societies for all.
2. **Women’s rights and gender equality**
   We will promote women’s and girls’ rights and enhance gender equality.
3. **Healthy planet**
   We will protect the natural environment and enhance its ability to support life for future generations.
4. **Lasting positive change**
   We will deliver long-term positive results.

**Cluster B: OUR APPROACH TO CHANGE**
5. **People-driven work**
   We will ensure that the people we work with have a key role in driving our work.
6. **Strong partnerships**
   We will work in fair and respectful partnerships to achieve shared goals.
7. **Advocating for fundamental change**
   We will address root causes by advocating for fundamental change.
8. **Open organizations**
   We will be transparent about who we are, what we do and our successes and failures.

**Cluster C: WHAT WE DO INTERNALLY**
9. **Empowered and effective staff and volunteers**
   We will invest in staff and volunteers to develop their full potential and achieve our goals.
10. **Well-handled resources**
    We will handle our resources responsibly to reach our goals and serve the public good.
11. **Responsive decision-making**
    We will ensure our decisions are responsive to feedback from the people affected by our work, partners, volunteers and staff.
12. **Responsible leadership**
    We will ensure our management and governing body are accountable.

For further information on the Global Standards, please refer to the booklet available from CCC: “12 Commitments for Dynamic Accountability.”