

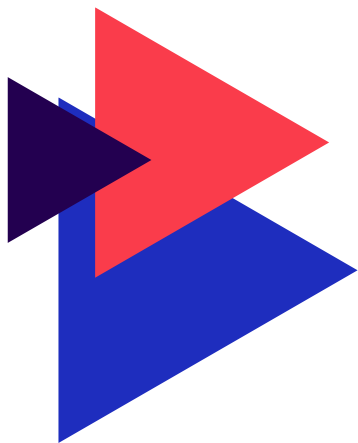
Challenges in Enforcement and Compliance of Social Security Laws in Cambodia



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Challenges in Enforcement and Compliance of Social Security Laws in Cambodia for Enhanced Compliance

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Acronyms

CBHI	Community Based Health Insurance
FGDs	Focused Group Discussions
GMAC	Garment Manufacturers' Association of Cambodia
GRET	Groupe de Recherche et d'Echanges Technologiques
HEFs	Health Equity Funds
HR	Human Resource
IDI	In-depth Interviews
ILO	International labour Organization
IT	Information Technology
MOEF	Ministry of Economic and Finance
MOH	Ministry of Health
MoLVT	Ministry of labour and Vocational Technology
NFV	National Fund for Veterans
NSSF	National Social Security Fund
NSSFC	National Social Security Fund for Civil Servants
OD	Operational District
PAI	Public Administration Institution
RGC	Royal Government of Cambodia
ROI	Return on Investment
SHI	Social Health Insurance
UNDESA	United Nations Department of Economic and Social Affairs
UNDP	United Nation Development Program



Executive Summary

1 Background

This report provides the findings of the study titled “Challenges in Enforcement and Compliance of Social Security Laws in Cambodia for Enhanced Compliance”. The study was conducted in the last quarter of 2021.

The Royal Kingdom of Cambodia has made great strides in human development in the last two decades: life expectancy has risen to 69.8 years in 2020, compared to 55 years in 1995. The poverty rate fell from 53% in 2004 to 13.5% in 2014,¹ Cambodia has seen a rapid rise in urbanisation in the last two decades. Twenty-four percent of the population is now urban. There has been a corresponding increase in industrial activity and the service sector but also a weakening of reliance on familial bonds that formerly protected family members (ILO 2012).

The Cambodian labour force was reported to be 9,163,843 in 2020² according to World Bank development indicators, compiled from officially recognized sources. A remarkable shift in employment is the rise of women workers, primarily in the garment industry. As of 2017 “over 70% of insured workers [were] female, owing to the size of the garment sector” (ILO 2017) in 2020.³

An OECD report (2017) notes that “in 2016 Cambodia crossed the middle-income threshold, marking the transformation from a largely agrarian economy to the latest Asian Tiger. ... Sustaining this pace of progress will prove a formidable challenge, especially given headwinds resulting from climate change, an ageing population and global shifts in manufacturing”.

In the absence of social security, a large proportion of families remain at risk of falling into poverty. Despite the many economic advances, large numbers of people remain vulnerable to poverty arising from low wages, disabilities, workplace accidents, sickness and the inability to work because of old age. For women of child-bearing age, the need for maternity leave and medical care before and after delivery can be very expensive if they lack insurance.

Between 2017 and 2019 the Royal Cambodian Government (RCG) initiated a social security framework that built on pension coverage for Civil Servants and formal-sector workers originally established in 2002. Premiums for Civil Servants are paid by the Government, which makes it financially unsustainable. In 2019 the RCG extended social security coverage in the form of healthcare and workplace-accident care and compensation to informal-sector workers, the self-employed, marine and air transport workers and domestic workers. The Social Security legislation includes old-age pension insurance for people presently in the workforce and unemployment insurance, but these have not yet begun to be implemented. It would seem that lessons can be learned from the health and workplace injury insurance programs that may be useful for when the pension and unemployment insurance programs are rolled out.

¹ Cited in the National Social Protection Policy Framework.

² World Bank Official website (<https://data.worldbank.org/>)

³ World Bank collection of development indicators, compiled from officially recognized sources, Cambodia Labor force, total - actual values, historical data, forecasts and projections were sourced from the World Bank on October of 2021

A persistent problem is that compliance with the requirements of the new social security framework has remained low. According to the World Bank only 13 percent of the workforce is covered by the NSSF. Only 2.6 million employees (2020) are registered. The NSSF inspection system requires analysis to understand how best to improve it so that more businesses comply with the law and more categories of workers take on social security insurance coverage. They will reap the benefits - improved health, pre and post pregnancy medical checks, workplace injury care and compensation - and will contribute to the funds required to sustain the social protection system.

1.1 Study Objectives and Scope of Work

The study reviewed Cambodia's Legal and Policy Framework for Social Security (2017)⁴: promulgated as Royal Kram No. NS/RKM/0618/012, (ii) the Law on Social Security Schemes (2019); Royal Decree No. NS/RKT/9520/582 (2020), on Creation of the National Social Security Fund (NSSF) as a Public Administrative Establishment (replaces NSSF created by SD#16 (2007); and (iii) Sub-Decree No. 196 (2020), on the Organization and Functioning of the NSSF. In addition the study reviewed reports from the ILO (Operational Review of the Cambodian National Social Security Fund (ILO, 2017) and the Social Protection System Review of Cambodia (OECD, 2017)⁵.

According to the Terms of Reference, these objectives require that the study focus on: (1) the Coordination mechanism between social protection entities including other Government agencies and social partners like employer unions and trade unions; (2) the use of technology, specifically the management information system (MIS) in enforcement and compliance of the Social Security Law. The study should also address (3) barriers for employers in complying with the existing social protection laws and regulations, (4) challenges of the government to enforce the implementation of the social security laws and regulations; (5) legal gaps in the social protection area that impede the compliance/enforcement; (6) methods of adaptation to the compliance issues currently practiced by employers and the government and (7) the training needs of stakeholders to improve enforcement and compliance of social security laws in Cambodia.

Achieving these objectives requires that the study:

1. **Identify and understand** the barriers to increased uptake
2. **Establish** ways and means of increasing the demand for the NSSF Social Security scheme through increased awareness on the part of employees and employers, in order to safeguard workers' rights to Social Security.
3. **Demonstrate** that the improved, informed, timely and quality service delivery enhances the trust of employees and employers in the NSSF and as a result increases the level of adoption membership;
4. **Determine** how a well prepared, structured and systematic NSSF can play an important role in the rule of law and support workers across all categories in the social protection system.

1.2 Limitations of the Study

It had been assumed that the COVID-19 pandemic would have some influence on the research but the limitation exceeded expectations. COVID-19 restrictions meant that travel was not possible for the international consultant: the study was completed with the help of a National Consultant in Cambodia. Two teams were hired for the study: one each in Cambodia and Pakistan. The differences of culture and language created something of a barrier to understanding views and perceptions.

⁴ Cambodia. National Social Protection policy framework (2016-2025). Approved in 2017

⁵ See Annex 01 for a complete list of documents reviewed.

2 Identified Challenges

2.1 Covid-19

- The evaluation of the new Social Security Law after approval was made difficult by the strict COVID-19 guidelines till now. NSSF has been unable to inform employers, employees and civil servants about the new law. NSSF has only shared retirement compensation information, but not health service or working accident compensation information. The enterprise inspections are facing severe delays. The inspection staff is under pressure to follow up enterprises and re-establish their relations and connections which were weakened due to restrictions on their physical activities.
- The registration and NSSF SS card issuance process was delayed due to the pandemic.
- Health issues increased with both members and potential members. Enterprises constantly ask for more registration but due to low staff and other restrictions the process is delayed.

2.2 Enforcement as Required by Law

Section B of the National Social Protection Framework (2017) Executive Summary enumerates the following challenges: The coverage of social assistance and social security is limited and cannot reach certain groups of citizens [who] are not protected; • The management of the various schemes has not been concentrated/ integrated, which leads to a lack of effectiveness and efficiency, high cost and inconsistency of benefits and allowances for various target groups; • The coordination mechanism at policy level and the monitoring mechanism to ensure effectiveness, accountability, and transparency of the management and operation of programs/ schemes are still limited. • The investment environment needs to be further improved and clarification is needed on tax policies related to the social protection system • The identification and registration of citizens, the identification of poor and vulnerable people and the registration systems of operators are not yet linked.

Section 4.2 of the Legal and Policy Framework for Social Security (2019) addresses Governance, noting that “the separate processes of setting up social protection policies in various ministries and institutions indicate the lack of a unified coordination mechanism. The arrangement has led to inconsistencies, gaps and overlaps of each policy, which negatively impacts the effectiveness and efficiency in the use of resources, both financial and human. In addition, the mechanism to monitor and evaluate the effectiveness of the management or operation of each program is not yet well defined, creating obstacles to the measurement of productivity and effectiveness of public expenditure and difficulties in implementing other policies that might follow”.

Implementing the National Social Security Fund and achieving the goals of the RGC’s National Social Protection Policy Framework will face several challenges across the three schemes.⁶ Challenges to implementing the Employment Injury Insurance program include the following: Awareness: Coverage remains low because some enterprises are not aware of the requirements and procedures of enrollment to the NSSF. The majority (71%) of employers experience difficulties registering their workers with the NSSF due to workers’ lacking identification, particularly when they transfer from the informal sector, according to a 2017 ILO study. Noncompliance: Many employers, particularly in the restaurant and entertainment industry are noncompliant, changing premises, suspending operations and closing firms without informing the NSSF. Education: Workers are often unaware of requirements to use contracted health facilities and instead access non-contracted hospitals, resulting in complicated administration procedures to resolve the mistake or a failure to be covered. Quality of contracted facilities: The quality of treatment services and medical care in some health facilities is not adequate or is of a low standard. Social Health Insurance - Business impact: Some employers delay renewing employee registration

⁶ Briefing Note: Commission on Health, Social Affairs, Veteran, Youth Rehabilitation, Labor, Vocational Training and Woman Affairs National Social Security Fund in Cambodia: Background for Field Mission to Prey Veng, Svay Rieng, Tboung Khmum and Kampong Cham Provinces. ©2019 Parliamentary Institute of Cambodia (PIC).

for the health care scheme because employees are required to register in-person and it will disrupt work flows, particularly on manufacturing assembly lines. Administrative noncompliance: Some employers fail to inform the NSSF when new workers are hired or existing workers are laid off. Lack of identification: Some employers experience registration problems because workers lack identification or their identification is fake. Workers are reluctant to push for registration in some cases if they do not have proper identification and will be fired or lose their seniority when it is discovered. Concerns over the quality of social health care: Workers often don't seek treatment at contracted health facilities or do not show their membership card as they believe that they would not be treated well without immediate payment, and they do not want to show their membership card. Pension scheme - Administration infrastructure: The implementation of a national pension scheme faces challenges in building administration capacity, particularly in finding the technical expertise to design and build a contribution and benefits system. There are also data limitations in analyzing the use and sustainability of the pension scheme prior to its launch.

Section B of the National Social Protection Framework (2017) Executive Summary identifies the following challenges: The coverage of social assistance and social security is limited and cannot reach certain groups of citizens [who] are not protected; • The management of the various schemes has not been concentrated/ integrated, which leads to a lack of effectiveness and efficiency, high cost and inconsistency of benefits and allowances for various target groups; • The coordination mechanism at policy level and the monitoring mechanism to ensure effectiveness, accountability, and transparency of the management and operation of programs/ schemes are still limited.

The present complement of NSSF Inspectors is insufficient for reaching newly-covered worker and employer categories. It appears likely that the expansion of services will require broad-based changes across the Departments responsible for implementing the new Law.

Including informal economy workers and domestic workers, as well as much greater numbers of employers, will further challenge the capacity of the Inspection staff, not least in terms of numbers: there are 1,1510 staff at present, of which only 51 [37.8%] are Inspectors. Many informal enterprises are small, which suggests that it will be very time-consuming to inspect them in significant numbers unless the system is streamlined. It is possible that domestic workers can be registered through their employers, although many such workers may work for more than one household.

NSSF Inspection reports are done on paper, which is time-consuming, subject to error and does not allow the high-level analysis needed for further planning.

Many self-employed people find it difficult to get the necessary documents approved by the Provincial or City Governor, although they can register with the payment system, which is easy and faster.

2.3 Compliance Challenges

- Achieving the full compliance of employers and employees remains difficult: the inspection and monitoring staff and processes are inadequate for the present scale of the NSSF (i.e. 151 inspectors for approximately 9,200 registered enterprises) and will be even more difficult once the enrolment numbers increase.
- Trade Union FGD participants noted that small garment factories do not register and NSSF does not fine them or follow up. Some construction sector employers register with NSSF for a few staff members in the office, so non-office workers do not benefit. Some companies are protected by high ranking government officers and the NSSF does not fine or punish them.
- Some employers do not register all employees if they are on short-term contracts or on probation.
- Some workers have found that their payment history and their benefits are lost if they change employers. This can be a problem for anyone, but especially if maternity care and leave are involved.

2.4 Inspection Challenges

- Article 13 of the Law on Social Protection (2019) requires the NSSF to conduct numerous complex duties that appear to be beyond the present capacities of the Inspectors, especially using the present paper-based data collection methods. They will be even less capable of meeting the compliance requirements of the new law unless new and better systems are put in place.
- In the short term, the challenges created by COVID-19, e.g. the slowed evaluation of the Social Security Law (2019) after approval; reduced inspections, delayed registrations and higher demand, need to be addressed.
- Fines can be ignored without penalty, despite clearly- stated legislation on the terms. There does not appear to be sufficient follow-up (e.g. to check on compliance) to initial inspections, in part because of insufficient staff.
- One study respondent noted that “the roles of NSSF and MOLVT are still unclear on social security inspection. NSSF is a public administration institution (PAI) autonomous from MLVT, so inspection is widely handled by NSSF. However, there is no clearly-stated provision for this. The Notification dated 25 August 2019 mentions inspection but is too short to explain the procedure and the enforcement process for this effectively”.
- Presently, several Departments have standalone databases; this limits cross-Department exchange of information. Analysis is necessarily limited as a result.

2.5 Management

The Operational Review of the NSSF (ILO 2017) provided a systemic view of the organizational challenges faced by NSSF to ensure effective service delivery. Building on the results of the Communication Strategy and the Operational Review, the ILO and NSSF have now partnered with the United Nations Department of Economic and Social Affairs (UNDESA) to implement a Modernization Project. It began in early 2019 with a business process review of the NSSF’s key systems. Over the course of the year, it will elaborate a proposal for the modernization of NSSF operations and management with a client-centered approach. Redesign does not necessarily entail large additional expenses or fancy technological solutions. It may just be about identifying how a particular aspect of a service may be limiting overall effectiveness and can be easily modified. Simplifying registration and contribution payment processes would also support the NSSF’s efforts to extend coverage.

3 Recommendations

The following recommendations are derived from (i) the Consultants’ analysis of the laws and (ii) information and perceptions from people included in the study.

3.1 Management

It is necessary to create systemic linkages - which might be conceived of as a ‘web’ - between the NSSF and all other agencies and Departments with responsibility for aspects of enforcement and compliance. This would include inspection: (NSSF is presently responsible for social protection program compliance and enforcement) and MoLVT is responsible for workplace safety inspections). One study respondent noted that “without the clear and active engagement of tax and registration agencies in Cambodia, it would be quite difficult to strengthen enforcement and compliance for the social security law”. The ‘web’ should also include links between links between the NSSF and the Dept of Finance, the entity responsible for levying taxes and the Courts of Law in case of non-compliance.

It is also necessary to create strong linkages between the Inspection system and the monitoring responsibilities of, e.g., the Social Security Medical Council and the National Social Protection Council and all other bodies responsible for monitoring any of the Social Protection programs as they are implemented.

There is a need to integrate monitoring and evaluation processes and learning into the design and implementation of social protection programs and policies. This would apply to the programs operating at present and those that come onstream in the future.

All NSSF activities, expansion programs and donor support initiatives should be aligned with the National Social Protection Policy Framework.

Management experts with good knowledge of up-to-date management systems should be recruited and tasked with identifying strengths and weaknesses in the management of the Social Security programs. The ILO's 2017 Organisational Review is a good starting point for this.

External specialists in Human Resources, MIS and Results-Based Management should be recruited to assess the identified issues (as indicated in this and other studies), and rank them in order of severity/"drag effect". The next step will be to link proposed ways forward to the Action Plan in the Policy Framework.

A 5-year Strategy and Annual Action Plans including targets (e.g. for rural/urban, gender, informal sector, domestic workers) should be generated and implemented. The Strategy should include a role for Trade Union leaders, who presently conduct awareness sessions about the NSSF and other topics directly with workers around 40 to 50 times per year.

The grievance redress mechanism is lacking in practice. It has been applied in labour disputes through arbitration and coordinating councils, but not for social security schemes. While incentives are in place from the laws and regulations, it is not always clear that the process can proceed. Incentives are actually greater 'encouragement tools' for ensuring efficient and quality services but are not used for the purpose.

The documents also indicated cooperation with the Ministry of Interior (the ID Smart Card), to set up a complaint system and database management function from the Occupational Risk Insurance Scheme, with the payment method to be contracted to health facilities with the scheme and outreach activities. Since 2013, the NSSF has clearly intended to link with existing data and information for its integration and to use the MIS for health insurance based on experience from the Occupational Risk Health Scheme.

Based on the Social Security Law (2019), Article 91, Dispute Settlement of Section 5 on dispute settlement, disputes are to be addressed through the Dispute Resettlement Committee of the NSSF. The next level is to refer to the social security regulator and the court system. Based on this law, the NSSF and social security regulators have lacked the power to sanction non-compliant enterprises. Article 97 in Chapter IX (Penalties), clearly states that the NSSF (through its Director General) could enforce a "Transitional Fine", while legal actions have to be followed in the court system. Without clear statements on this matter, checking the compliance and enforcement levels are still under the duties and roles of labour inspection.

3.2 Compliance

A Communications Strategy with annual Action Plans (with clear objectives, targets and intended results) is needed to inform everyone who is eligible to enroll in a Social Service scheme of the substance of the Social Security laws, the applicability of the laws to them, the details of the enrolment process, the procedures for making claims, the benefits to members and the complaint mechanisms. The messages should be targeted to specific audiences: urban, rural, female and male, youth, mature workers, etc.. It is particularly important to reach workers with low levels of formal literacy and to provide usable options for their access. Given the high levels of compliance achieved by women in the garment sector, it would be useful to include women workers and business owners in reaching other women in the Communications Strategy and Implementation Plan.

At present Communication Awareness Tools consist of: the NSSF Official Website,⁷ which contains registration forms, monthly payment contribution for health care scheme, pregnant women reporting form and informal economy workers' reporting form available for download. A **Hotline (1286)** for client services and call centers and its sub-offices nationwide. It is not clear how the hotline data is used for the improvement of schemes, access to services or a complaint mechanism. The data is not categorized based on the type, geographical coverage or types of respondents; two **Smart Apps** are available for NSSF members and NSSF and Health Facilities (available on Google Play and the App Store). However, it is not clear whether outreach is utilized for the communication of schemes and benefits to increase coverage. **Facebook** is the most convenient means of communication but unfortunately it is not administered with a spirit of problem-solving.

It is important to note that, due to COVID-19, the interest of employees and employers in NSSF services has increased. The NSSF web page, Facebook, and smartphone app were very productive during the pandemic. The information-seeking culture has increased. Employees and employers can easily find more information, locations of health service centers, NSSF validity and other important documents on these portals. NSSF added approximately 1,000 members in one month.

In 2018 a communication strategy was developed for the NSSF by '17 Triggers', the NSSF-C and the ILO with the financial support of the Auchan's Foundation's 'Weave our Future'⁸. A Review of that Strategy could provide a useful starting point in designing and implementing a broad-based Communications Strategy focussed on the applicable Laws. Information should be conveyed to all NSSF officers, including those who are present at public health service centers.

NSSF has designed and put in place diverse outreach activities and strategies to ensure that information is accessible by its members inclusively. However, the majority of workers have low levels of formal education thus, more - and more focussed - outreach strategies and activities need to be organized and mobilized for them. In workplaces where trade unions are active, representatives should be included in the design, pilot-testing and implementation of the communication strategy.

It is important to orient NSSF staff, employers, workers and contributors to the new Law in order to increase levels of compliance. Internal training courses are provided⁹ for NSSF staff, but not for employers and employees. A program of training sessions, including Training of Trainers and a rollout plan will make it possible to ensure that all NSSF staff have the same knowledge and be better equipped to inform employers, the self-employed, marine and transport workers and domestic workers about their rights and responsibilities in the NSSF. NSSF should engage in raising awareness online, because currently even workers with limited education can do a phone search and share information with others. NSSF should learn more about workers' knowledge and capacities, then they can see how to provide better awareness to them.

Measures to increase NSSF card holders' trust in health care provision are necessary if the uptake of health care services is to increase.¹⁰ Efforts to improve the quality of care for NSSF card-holders could include: improving the respect shown to NSSF patients and providing the same quality of medicines to NSSF and private patients. Budgetary provisions should be examined and increased if necessary to ensure that this happens. Assessments

⁷ <http://www.nssf.gov.kh>

⁸ https://www.social-protection.org/gimi/RessourcePDF.action;jsessionid=KAOBW4MP0XpvtPnJKsfX_fo5N7MqkpXmOqP0SnCXn6NGwznmq9bZ!510311148?id=55150

⁹ NSSF Report Ten-Year Achievements 2008-2017 and Action Plan 2018. <http://www.nssf.gov.kh/default/wp-content/uploads/2018/04/Binder1.pdf>

¹⁰ Interviewees identified the lengthy time required to fill out complex documents, the negative attitudes of health care workers toward NSSF card holders, and the lack of, or need to pay for, emergency care until the documentation is complete.

of public health care facilities and staff are also necessary, as are comparisons between public and private health care providers, in order to determine the standards of care for NSSF card holders. Due to negative perceptions of the quality of public care, some companies also purchase insurance from private companies for their employees, which should not be necessary.

It will be useful to analyze and learn from methods used to increase coverage in the past. "After the adoption of the legal framework which made affiliation compulsory in the garment sector, the coverage expanded rapidly from 7,144 to 1.4 million workers in less than two years (2016-2018) (ILO 2017).

3.3 Inspection

A comprehensive Inspection System guideline needs to be set up to ensure that the Social Security Laws can be executed systematically by the NSSF Inspectors to achieve the desired levels of compliance.

The ILO (2012) has called for the "vertical integration of the MIS systems in all relevant sections". Skilled users and analysts will be needed, particularly if a vertically-integrated MIS is designed.

Many or all of the NSSF Inspection system should be computerised. At present the NSSF inspection system has the following array of responsibilities and authorities:

- Identification of new enterprises
- Ensure the law reinforcement and explain the legal procedure.
- Examine in case of complaints, in case any enterprises have not complied with the law and provisions
- Inspection on registration (through a constraint letter)
- Inspection on fine being imposed
- Inspect on file (declaration of incorrect number)
- Inspection on demanding fine
- Inspection on demanding a work injury report
- Inspection on request of suspending operation, and other works¹¹
- Issuance of prior notice of inspection
- Issuance of contributory notification
- Issuance of notification on contribution payment
- Issuance of a constraint letter
- Issuance of fine letter by the NSSF Director in case of an enterprise filing a lawsuit in the court
- Inspection on enterprise suspected to close
- Issuance of enterprise registration certificate
- Issuance of letter for demanding contribution, fine, and interest
- Facilitation for registration.

3.4 Ratification of ILO Conventions

Consideration should be given to ratifying and bringing into force: ILO Convention No. C-081: Labour Inspection Convention, 1947 (No. 81), which would be a useful guide to establishing a Labour inspection system aimed at preventing workplace injuries. This is directly relevant to the NSSF workplace injury compensation insurance program. ILO Convention No. 102, which sets out the minimum standards for medical care, sickness benefit, unemployment benefit, old-age benefit, maternity benefit, employment injury benefit, family benefit, invalidity benefit, and survivors' benefit. To be included in Social Security policies.

A Results-Based Monitoring and Evaluation framework with short, medium and long-term goals, targets disaggregated by employment category, and key performance indicators, should be established and implemented.

A Five-year Strategy and Annual Action Plans including the established targets (e.g. for rural/urban, gender equality, informal workers, domestic workers, transportation and marine workers) and key performance indicators should be generated and implemented.

The Cambodia Socio-Economic Survey (CSES) should serve as a resource for assessing the impact and coverage of social protection provision (OECD, 2017) Conversely, it is necessary to Incorporate a Social Protection module within the Cambodia Socio-Economic Survey.

¹¹ Report on Annual Achievements 2019 and Action Plans of the National Social Security Fund (NSSF).

3.5 Capacity-Building

A Capacity-Building Strategy should be designed, with an Implementation Plan. The Strategy should engage with all relevant Ministries and Departments. A Training Needs Assessment should be conducted, then a rigorous capacity-building training program should be developed for NSSF Managers and Inspectors as well as IT and HR staff. Trade Union leaders should be informed about the Strategy and Implementation Plan, as they usually inform workers about their rights and obligations.



Chapter I
RESEARCH
Methodologies



Chapter I - Research Methodologies

1 Research Methodologies

The study used the approach known as **3Ps**¹²: **Paper, Practice and Perception**.

- **Paper:** Understanding what is promised and documented in the Law and Ordinances, authorities and the limitations of compliance.
- **Practice:** To know the standards in place, capacities of concerned staff/officers, and limitations to relate with the compliance, trust and provision of services.
- **Perception:** To enquire about the level of satisfaction with the services promised by the institutions under the employers' social security schemes and to understand investors' points of view with respect to return on investment (RoI).

1.1 Desk Review of Cambodia's Social Security Legal and Policy Framework

A detailed literature review was conducted. Approximately three dozen documents¹³ were reviewed, including: the Social Security and Protection Law, NSPC Policy documents, research and gap-assessment reports by different donors. Inspection Regime under Social Security/Protection Law, Stakeholders initiatives by local and international partners, existing Inspection procedures of NSSF, Inspection, violation, procedures and method, the documentation and data collection system by the Social Security/Protection Department, Comparison of Social Protection Laws with respect to International Standards (gaps and bottlenecks) and international best practices on Social Protection.

The review helped in analyzing the overall legal mandate of NSSF, different roles and responsibilities of ministries and stakeholders, roles of professionals and office bearers, and coverage and scope of benefits under the social security law. The review also helped to evaluate the NSSF implementation structure, framework, teams, partners' capacities and roles in overall service delivery.

1.2 Qualitative Research

1.2.1 Development and Testing of Field Assessment Tools

Both the qualitative and quantitative research tools (FGDs, IDIs and quick perception survey) were developed, shared and discussed with the ILO-Cambodia team for their inputs and recommendations. A research plan was developed and shared with the ILO Project Team in advance to ensure effective implementation, monitoring and to coordinate support during the fieldwork from Pakistan. The national consultant conducted the field research using the tools finalized by the International Consultants from Pakistan.

1.2.2 Collecting Qualitative Data

Interviews and Focus Group Discussions were held with UN agencies and others working on social protection such as ILO, UNICEF, UNDP and GIZ; Government agencies including the General Secretariat of NSPC and NSSF; relevant Ministries including the Ministry of Labour and Vocational Training (including the Labour and Social Security Inspectorates), the Ministry of Economy and Finance; and Employers' Associations and Trade Unions.

The study methods utilised were: designing, testing and implementing qualitative tools for data collection and a small-scale quantitative survey. Thirteen In-Depth Interviews (08 in-country by the National Consultant and 05

¹² Research framework developed and used by the international consultation of this research study.

¹³ A list of documents reviewed is attached as **Annex 01**

virtually by the International Consultant) and four FGDs (38 participants) were held with UN agencies and others working on social protection including the ILO, UNICEF, UNDP and GIZ; Government agencies including the General Secretariat of NSPC and NSSF; the MoLVT (including the Labour and Social Security Inspectorates), the Ministry of Economy and Finance; Employers' Associations (CAMFEBA), NSSF staff and Inspectors and members of the NACC trade unions, as well as staff from the Ministry of Commerce and registered and unregistered enterprises. The survey data was analyzed using SPSS.

In-depth Interviews¹⁴ (IDIs): Interview protocols for each interviewee in Cambodia, were prepared with respect to their role and mandate in the construction sector. A total of 13 IDIs were conducted with UN officials, partners, employers (registered and unregistered with the NSSF), employees (registered and unregistered), experts, staff and trade union representatives in Cambodia. The IDIs (08) in Cambodia were conducted by the National Consultant while (05) IDIs with the representatives of UN agencies and NSPC were virtually conducted by the International Consultant from Pakistan.

Focus Group Discussions (FGDs)¹⁵: Guidelines were developed for discussion and shared with the LO and the national consultant for their feedback and cultural synchronization. A total of 04 FGDs were conducted with individuals, including NSSF staff, workers, employers' representatives and trade union members.

1.3 Quantitative Research

A quantitative assessment was designed but due to the COVID19 and SOP limitation in Cambodia, the structured quantitative assessment was converted into a rapid, semi-structured perception survey and dove-tailed with the IDIs and FGDs. A total of 38 individuals (including NSSF staff, representatives from the labour Ministry, registered and unregistered employers, registered and unregistered workers, and workers' and employers' representatives) provided insights and information on NSSF services, enforcement and compliance.

1.4 Data Collection and Analysis

A team of international consultants from Pakistan was hired to conduct the research study. The selection was based on their recent assignment on similar work on the enforcement and compliance gap assessment for Employees Social Security Institutions (ESSIs) for ILO-Pakistan.

The Cambodian national consultant worked closely with the international consultants to conduct field research (qualitative and quantitative) in Cambodia due to COVID19 restrictions.

The perception survey data was imported and analyzed in SPSS. Data from the FGDs and IDIs was transcribed and analyzed for content and organized in accordance with the study's research objectives and requirements.

1.5 Limitations of the study

It was assumed that the COVID-19 pandemic would have some influence on the research but the limitation faced was greater than had been anticipated. The limitations included the following:

- COVID-19 restrictions meant that travel was not possible for the international consultant: the study was completed through distance with the help of a national Consultant in Cambodia.
- Two teams were hired for the study, one each in Cambodia and Pakistan. The difference of culture and language was a big barrier in translating the views and perceptions.

¹⁴ List of persons interviewed is attached as **Annex 02**

¹⁵ List of persons invited for discussion (FGDs) is attached as **Annex 03**



Chapter II
FINDINGS & PERCEPTION
of NSSF Services



Chapter II – Findings & Perception of NSSF Services

1 Key Findings

1.1 Review of Social Security Laws and Policies

Legal and Policy Framework for Social Security (2019), approved October 2019. The strategic goals and plans are based on the following key principles: 1. Reforming the governance structure of the whole social protection system by clearly defining the roles and responsibilities of key stakeholders at policy level, regulatory level and operational level; 2. Enhancing the effectiveness of public expenditure by reforming the management of operating agencies and defining the contribution mechanisms to support the priority policies based on the level of each citizen's income and the availability of state budget; 3. Maximizing the coverage to encourage every citizen to access protection based on the type of each program or scheme, given the phase of the country's development; 4. Reviewing cross cutting issues in order to move the social protection development plan forward and to remove barriers which might result from the lack of progress or stagnation of developments in other relevant sectors¹⁶.

1.2 Law on Social Security Schemes (2019)#

Article 15: Monitoring the regulation enforcement under the authority of NSSF as stipulated in this law is authorized to the social security inspectors. Nomination and duties of social security inspectors are regulated by Sub-Decree.

Article 65: Service Quality Monitoring of Health Facility Recognition of medical care service quality shall be compiled with the legal instruments issued by the Ministry of Health. The service quality of health facilities that signed the agreement with NSSF shall be monitored and evaluated by the Social Security Medical Council.

The National Social Protection Council (NSPC) has been assigned responsibility for coordinating, monitoring and orienting roles in line with policies and strategies.

Article 97 defines Punishment and Penalties for non-payment of compulsory contributions, including transitional fines, fines or imprisonment. Transitional fine is under the authority of the Director General of NSSF. Payment of transitional fines shall lead to the extinction of legal action. In case the offender does not pay the transitional fine, the case shall be sent to the court with the aim of following the procedures. Formalities and procedures of transitional fines shall be regulated by Prakas of the Minister of the Ministry in charge of social security schemes.

Article 98: Objection to Contribution Payment. Employers of enterprises/establishments who do not comply with the contribution payment by the deadline or submit the incorrect number of workers as stipulated in article 82 of this law shall be liable to a fine of 10 (ten) to 30 (thirty) times of daily base wage. This fine shall be applied equivalent to the number of workers employed in the conditions contrary to the provisions of this law.

Article 99: Contribution Deduction in noncompliance with the Provisions of the Law. Any employer who has deducted the contributions of Occupational Risk from workers' wages or the contributions borne by himself by deducting from workers' wages for the contribution payment of Health Care, Pension or Unemployment

¹⁶ Rules, Roles and Controls Governance in Social Protection with an Application to Social Assistance Lucy Bassett, Sara Giannozzi, Lucian Pop and Dena Ringold, Background Paper for the World Bank 2012–2022 Social Protection and Labor Strategy.

Schemes shall be penalised for imprisonment of 1 (one) month to 1 (one) year and a fine of 120 (one hundred twenty) to 360 (three hundred sixty) times of daily base wage. This fine shall be applied equivalent to the number of workers from whom the employer has deducted contributions in the conditions contrary to the provisions of this law.

The Law on **Social Security Schemes** clearly states that only the NSSF, social security regulator and court system will be responsible for the enforcement of social security law and ensure its compliance in Cambodia.

Royal Decree No. NS/RKT/9520/582 (2020), on Creation of National Social Security Fund (NSSF) as a Public Administrative Establishment (replaces NSSF created by SD#16 (2002))

The NSSF is responsible for ensuring compliance with the law and implementation of social security schemes in the country. It is also responsible for managing the fund in accordance with Sub-decree No. 16 dated March 2, 2007. The NSSF is a 'juristic person' with the mission of public service provision, employee registration, fund collection and management, and employee benefits. The NSSF is under the technical tutelage of the Ministry of Labour and Vocational Training and the financial tutelage of the Ministry of Economy and Finance. In this regard, the NSSF is responsible for the employment injury insurance, health insurance and pensions#.

Article 13: Duties of National Social Security Fund. NSSF shall have the following duties: 1. Administrate the implementation of social security schemes in accordance with this law. 2. Ensure the benefit provision of social security schemes to the NSSF members in a bid to alleviate the hardship of their livelihood when encountering the contingent risks—old age, invalidity, death, occupational risk, unemployment, maternity, illness or injury and other contingencies. 3. Collect and administrate contributions of each social security scheme and other incomes. 4. Register and manage the identity code of the NSSF member. 5. Monitor the implementation of enterprises/establishments or relevant institutions under the competency of NSSF in relation to the provisions of this law. 6. Educate, disseminate and monitor the implementation of actions to be taken for occupational risk and health prevention for NSSF members. 7. Study, research and investigate work injury. 8. Study, research and prepare the legal instruments about the determination of occupational disease types. 9. Sign the agreement and monitor the implementation of the contracted health facilities.

10. Study, analyze and conduct the actuarial valuation of each social security scheme. 11. Implement the activities in relation to health and society with the benefits of the NSSF member. 12. Administrate the investment of social security funds.

SUB-DECREE No. 140 SD.E ON REVISION OF ARTICLE 7 OF SUB-DECREE NO. 01 SD.E, DATED 06 JANUARY 2016, CONCERNING THE ESTABLISHMENT OF SOCIAL SECURITY SCHEMES ON HEALTH CARE FOR PERSONS DEFINED BY THE PROVISIONS OF THE LABOUR LAW states that: Every employer and worker under the provisions of the law on the Social Security Schemes for Persons Defined by the Provisions of the Labour Law shall be compulsory to pay contribution of health care scheme to the National Social Security Fund until 31 December 2017. Contribution payment of the health care scheme set forth in the paragraph above is borne by the employer starting from 01 January 2018 onwards.

1.3 ILO Conventions Related to Social Security

Cambodia has ratified 13 ILO Conventions but unfortunately, none of them related or refer to social protection or social security.

2 Perceptions of the Social Security Fund Services

In response to various discussions regarding social security law, respondents mentioned that this law does not coerce employers or employees to join NSSF, so some of them do not take any action to respond. The law should state the responsibilities of company owners to NSSF, so that they are more accepting of the services. According to NSSF, no work agreement should be acceptable until an employee is registered with NSSF. The employers and employees still do not understand the importance and benefits provided against the membership amount. Due to COVID-19, the revised law is not implemented due to which deficiencies cannot be identified. According to NSSF senior management, a comprehensive mechanism would be required for mass communication to understand the new NSSF law.



Table 1: Beneficiaries' Perceptions of NSSF Services (from the quantitative survey)¹⁷

Issue (posed as a question to respondents)	Approval Rates: Registered Entities and persons			
	Enforcement Agency	Employers	Workers	Union
Application Process	<ul style="list-style-type: none"> ● 80% Excellent ● 7% very good 	<ul style="list-style-type: none"> ● 25% very good ● 75% no response 	<ul style="list-style-type: none"> ● 100% no response 	<ul style="list-style-type: none"> ● 50% Average ● 50% very good
Amount of Contribution	<ul style="list-style-type: none"> ● 2% Excellent ● 80% very good 	<ul style="list-style-type: none"> ● 	<ul style="list-style-type: none"> ● Nil 	<ul style="list-style-type: none"> ● Nil
Perceptions of the Contribution System/Mechanism (e.g. paperwork, time, frequency)	<ul style="list-style-type: none"> ● 100% Excellent 	<ul style="list-style-type: none"> ● 75% very good ● 25% below average 	<ul style="list-style-type: none"> ● 100% excellent 	<ul style="list-style-type: none"> ● 100% very good
Return on Investment (Benefits of Contribution)	<ul style="list-style-type: none"> ● 93% Excellent 	<ul style="list-style-type: none"> ● 7% average 	<ul style="list-style-type: none"> ● 100% 'below average' 	<ul style="list-style-type: none"> ● Nil
Availability of Services	<ul style="list-style-type: none"> ● 93% very good ● 7% 'excellent' 	<ul style="list-style-type: none"> ● 75% below average ● 25% average 	<ul style="list-style-type: none"> ● 100% below average 	<ul style="list-style-type: none"> ● 50% average ● 50% below average
Perceptions of Timely Service Provision	<ul style="list-style-type: none"> ● Nil 	<ul style="list-style-type: none"> ● Nil 	<ul style="list-style-type: none"> ● Nil 	<ul style="list-style-type: none"> ● Nil
Compensation and Reimbursement Mechanism	<ul style="list-style-type: none"> ● 86% excellent 	<ul style="list-style-type: none"> ● 25% very good 	<ul style="list-style-type: none"> ● Nil 	<ul style="list-style-type: none"> ● 50% very good
Reimbursement Time	<ul style="list-style-type: none"> ● 86% excellent 	<ul style="list-style-type: none"> ● 25% very good ● 75% no response 	<ul style="list-style-type: none"> ● 100% no response 	<ul style="list-style-type: none"> ● 50% very good ● 50% no response
Communication skills	<ul style="list-style-type: none"> ● 93% very good 	<ul style="list-style-type: none"> ● 25% very good ● 75% below 	<ul style="list-style-type: none"> ● 100% poor 	<ul style="list-style-type: none"> ● 50% very good ● 50% below

¹⁷ All quantitative information collected through quick survey is attached in the form of charts in Annex 03

		average		average
Facilitation Skills	<ul style="list-style-type: none"> ● 93% very good ● 7% excellent 	<ul style="list-style-type: none"> ● 25% very good ● 75% poor 	<ul style="list-style-type: none"> ● 100% poor 	<ul style="list-style-type: none"> ● 50% very good ● 50% average
Behavior of Service Providers	<ul style="list-style-type: none"> ● 93% very good ● 7% average 	<ul style="list-style-type: none"> ● 75% very good ● 25% average 	<ul style="list-style-type: none"> ● 100% below average 	<ul style="list-style-type: none"> ● 50% average ● 50% below average
Inspectors' and Administration Staff Members' Attitudes to Helping and Problem Solving	<ul style="list-style-type: none"> ● 86% average ● 7% very good ● 7% below average 	<ul style="list-style-type: none"> ● 100% average 	<ul style="list-style-type: none"> ● 100% below average 	<ul style="list-style-type: none"> ● 50% average ● 50% below average
Availability of the Complaint System	<ul style="list-style-type: none"> ● 93% very good ● 7% below average 	<ul style="list-style-type: none"> ● 25% very good ● 75% no response 	<ul style="list-style-type: none"> ● 100% no response 	<ul style="list-style-type: none"> ● 50% very good ● 50% poor
Equality in Response	<ul style="list-style-type: none"> ● 93% very good ● 7% excellent 	<ul style="list-style-type: none"> ● 25% average ● 75% no response 	<ul style="list-style-type: none"> ● 100% no response 	<ul style="list-style-type: none"> ● 50% very good ● 50% below average

The quick perception reveals that there is no feedback mechanism in the NSSF, which is one of the key reasons for low compliance and average acceptability of NSSF health services. It is evident in the above table that from the NSSF perspective everything is excellent but the end beneficiaries have their reservation on NSSF services. For example:

- 1 As per the beneficiaries, the services they are getting in response to their contribution is below average (100%) while NSSF finds this excellent (93%).
- 2 the quality of complaint system is rated 50% by the union while none of the workers provided any response (100% not responded) on that which means they are either not aware of the system or they never went for it
- 3 the behavior of staff is rated 93% "good" by the NSSF but the end beneficiary did not find this as good as rated by the NSSF themselves.
- 4 NSSF is quite satisfied with (80%) application process but the contributors did not find this a friendly process (only 25% rate it good), the difficulty in the application process could be one of the reasons for low coverage.
- 5 The behavior of NSSF inspectors and staff is one of the keys of trust which is rated "below average" by all the respondents including enterprise owners who pay the contribution and workers who seek the services. Surprisingly, NSSF staff know this fact and rated themselves "average" in service provision.
- 6 As far as the facilitation skills of NSSF staff are concerned, beneficiary (enterprises) did not find them acceptable (100% poor), but in contrast NSSF staff think they are excellent in facilitation (93% good).

2.1 Perception about NSSF Contributions

As per the law, the employee should not pay over 50% of the total contribution. Recently, some employers are paying all contributions to NSSF. The rate is based on the salary and the maximum is 40,000 Riel (about USD10) per month for those who have a salary of 1,000,000 Riel (about USD 250) per month

2.2 Skills and Competencies of NSSF Staff

2.3 Capacities of Inspectors

The job of NSSF inspectors is to promote awareness and implementation. The staff is oriented about the inspection process, policies and other factors by the experienced senior management. The NSSF professionals have enough understanding of the law to implement their work. The senior management in NSSF is also available for any support required to executive their work.

1.1.1 Internal System for Capacity Building

NSSF does not conduct training like other NGOs or companies, but each Department Director needs to respond to this and provide regular coaching to their staff. In case Department Directors cannot solve an issue, meetings are arranged internally to discuss and resolve the issues.

1.1.2 Trainings of Inspectors

Training for inspectors is arranged as first general training about the new law to our staff at the national and provincial levels and specifically to each department.

1.1.3 Instructors / Trainers

There is no structured training department, curriculum or standard guidelines. Training of instruction is handled by the senior management of the NSSF. The senior management serve as an instructor to provide training to each department. The training is about guidelines, the implementation process, and matters related to any challenges.

1.1.4 Coaching through Social Media (Telegram Group)

Besides in-house training sessions, a social media group on “Telegram” is also functional for the support of field officers and inspectors. According to the Senior Director in NSSF, “we do not need external instructors for the training and each Department instructor can share it with their colleagues and other departments”.

2.4 Complaint Mechanism

When complaints about health service happen at the sub-national level, matters are also discussed directly with the Health Service center for an immediate solution. According to NSSF senior management, they always have good cooperation, and discussions to solve some issues, and verification about the number of employees with the Ministry of Commerce relating to registration and the tax department for tax payment.



Chapter III
**Conclusions &
Recommendations**



Chapter III - Conclusions & Recommendations

1 Conclusions

At present 1,388 people (736 men and 654 women) staff the NSSF in Administration and Human Resources, Inspection and 'Other' roles. This will need to be increased significantly to cope with the increased coverage of the NSSF. It is likely, too, that different kinds of expertise will be required in order to reach and monitor the new categories of coverage (e.g. Civil service, domestic workers, the self-employed, and so on)

The majority of the relevant ILO Conventions have not been ratified. It is worth noting that the Convention on women working at night is one of these.

The inspection and monitoring processes appear to be insufficient for the scale of the NSSF at present, and will be even less capable of meeting the requirements in the new law.

The MOLVT also has an independent department responsible for labour inspection. The responsibilities of NSSF and MOLVT are still unclear on social security inspection. Practically, NSSF is a public administration institution (PAI) autonomous from MLVT: thus, inspection is widely handled under NSSF itself. However, there is no such provision clearly stated about this. Only the Notification date of 25 August 2019 mentions the inspection. It is too short to explain the procedure and the enforcement process for this effectively.

NSSF inspectors are not as well-informed about the program as they could be. They apparently learn on the job, by discussing issues with each other, rather than being fully trained in the details of the NSSF. This also means that knowledge is not necessarily consistent across the country.

The Inspectors use paper-based data, rather than electronic methods. This limits the efficiency of data collection, and the speed at which data is updated and made available for analysis. Analysis is necessarily limited as a result.

Some part-time and contract workers are not counted as employees, and are unable to get an NSSF card with attendant benefits.

NSSF payments and entitlements are sometimes lost if an insured worker changes jobs.

It is not clear whether the NSSF data is disaggregated by location (e.g. rural and urban, Phnom Penh and other parts of the country) or whether data is disaggregated by employment sector, gender or age (e.g. youth and retirement age).

There may be instances of unconscious bias on the part of Inspectors and monitors. One NSSF respondent noted that "[women] garment workers from rural areas do not understand about NSSF, especially garment workers who are from rural areas. They tend to lack general knowledge and sometimes they just listen to others who are not well-informed". However, the ILO (2017) says that over 70% of insured workers are women.

A Facebook page is available but it appears that there is no operator to respond to queries.

Some concerns were expressed about transparency in decision-making and decisions to not impose legislated sanctions (typically fines).

2 Recommendations

2.1 Registration

- An MIS for registration and compliance and trend analysis should be designed and installed. Skilled users and analysts will be needed. The ILO (2012) called for the “vertical integration of the MIS systems in all relevant sections. It is worth noting that in 2013 the French NGO GRET transferred 17 trained HIP staff to transfer its complaint system and the MIS to NSSF. It is also worth considering any learning that is available from this initiative.
- Technically, registration has been required and followed instructions and guidelines and the payment has been done monthly or annually per agreement between NSSF and the enterprises. Registration should be linked to the NSSF’s website for fill-in and requirements. At present, in order to verify that correct and truthful declarations have been made, the NSSF has retained its standalone database without linking to other databases for verification.

2.2 Capacity Building

- **Capacity-needs assessments** should be designed and implemented for NSSF staff. This would apply to Inspectors, field staff and mobilizers and IT staff. Learning from the assessments should be brought into the establishment of a capacity-building program. The program should emphasize the need for analysis of the data, so that reporting is useful for learning and further planning. Analyses of available data should track annual trends in expansion of coverage and compare these with Annual Plans.
- A **Capacity-Building** Strategy should be designed, with an Implementation Plan. It would be useful to recruit an expert external to the NSSF to do this. The expert would be required to engage with all relevant Ministries and Departments.
- A rigorous capacity-building training program should be developed for NSSF managers and inspectors. This would cover the laws, policies and protocols in place for Social Security in Cambodia. It would include the ILO Conventions relevant to labour, such as workers’ rights and workplace safety and standards, as well as ILO Reviews of the NSSF such as the one conducted in 2017. Such a program would systematize the knowledge base and capacities of the entire management stratum. An expert in high-level training, ideally from outside the NSSF, should lead the endeavour and be committed to fully engaging with relevant Ministries and Departments.

2.3 Inspection System

- The inspection protocols should be reviewed and synchronized with law, stakeholders roles (different ministries) and expected outcome of the inspection system.
- A comprehensive training of inspection staff would be useful to help inspector to understand their role as advisor, mentor than the inspectors.
- The ILOs-GFC project will be very useful in streamlining the combined inspection system, as they are already doing the same in garment sector project.
- A combined and mutual inspection system can also be introduced. The ILO-GFC project can also conduct (as per GFC Representative in an Interview) TOTs for NSSF inspectors and field staff.

2.4 Communication

- A Communication Strategy should be designed and implemented, based on current and culturally-appropriate methods. A Communications Strategy was created for the NSSF. A Review of that Strategy

will be a useful starting point in designing a Strategy focussed on the 2019 Law. The objective is: Right message through right tools to right audience: It should make the best use of the ILO-developed NSSF Information Pak for orientation. It can be divided into small modules and flyers for respective audiences.

- The same modules and flyers can be mass-marketed through the Facebook page for a larger and wider audience.
- Videos can replace print information so as to reach younger audiences and the non-literate.
- Telegram, WhatsApp and Signal App can be used to broaden the coverage and there should be a dedicated person to respond to Facebook and Telegram.

2.5 Integration of Information Systems

- It is clear that SSO and DoE have developed their database individually and they have not been linked. The process of entitlement of UI in Thailand is mostly the same as the Japanese system. Unemployed persons need job seeking before they claim and receive benefits of UI. The linkage between the DoE and SSO databases related to unemployed persons would benefit from a more efficient administration of the UI scheme.

2.6 Best Practices

- The Thai Government has developed a UI scheme in cooperation with development partners. Similar best practices should be reviewed to strengthen the NSSF schemes in Cambodia.



Annexes

List of Documents Reviewed

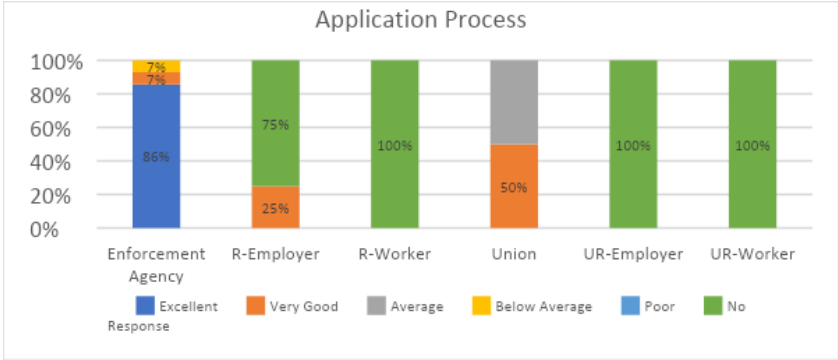
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List of Person Interviewed by International Consultant

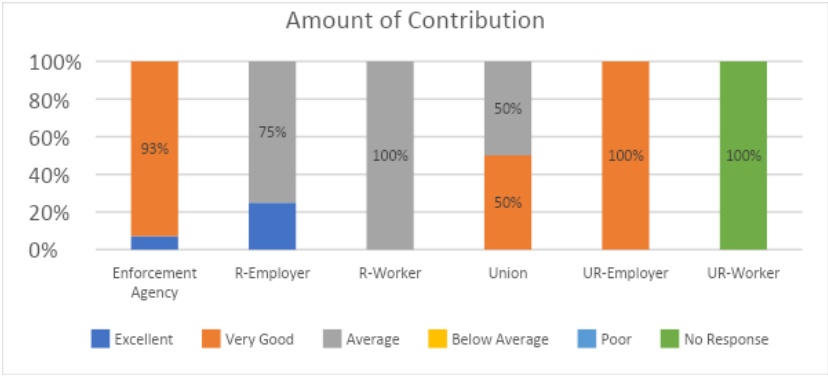
Sr.	Name	Title	Organization
1	Mr. Robert Rene	labour Inspection Specialist	ILO Bangkok
2	Mr. Cunha Nuno Meira Simoes	Social Security Specialist	ILO Cambodia
3	Ms. Sara Park	Social Security Specialist	ILO Cambodia
5	Mr. Samedy YOK	Deputy Secretary	GS-NSPC

Perception Survey Results

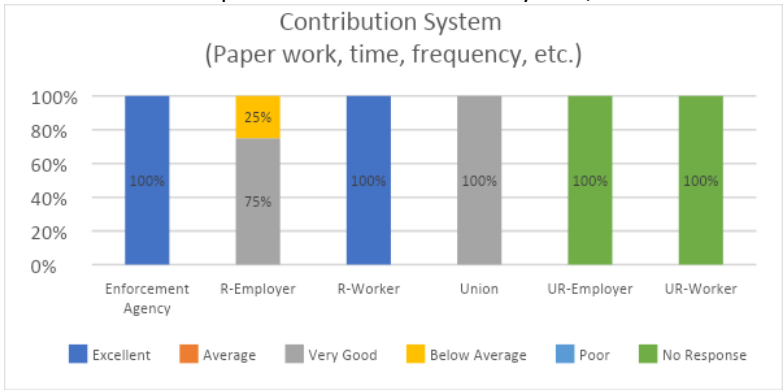
1. Perceptions about the Application /Registration Process



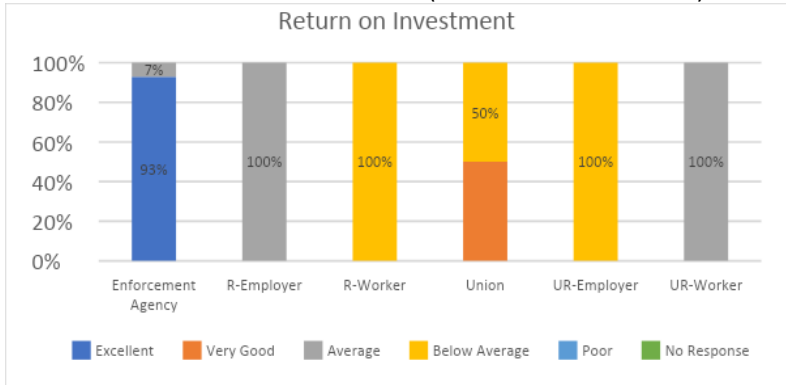
2. Amount of Contribution



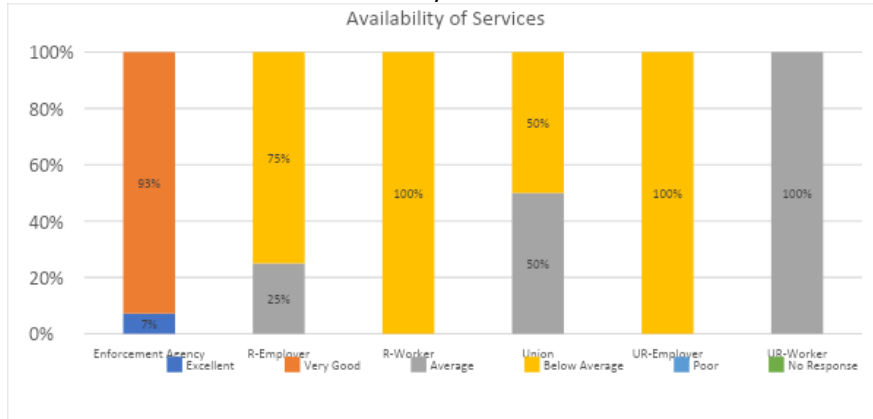
3. Perceptions of the Contribution System/Mechanism



4. Return on Investment (Benefits of Contribution)

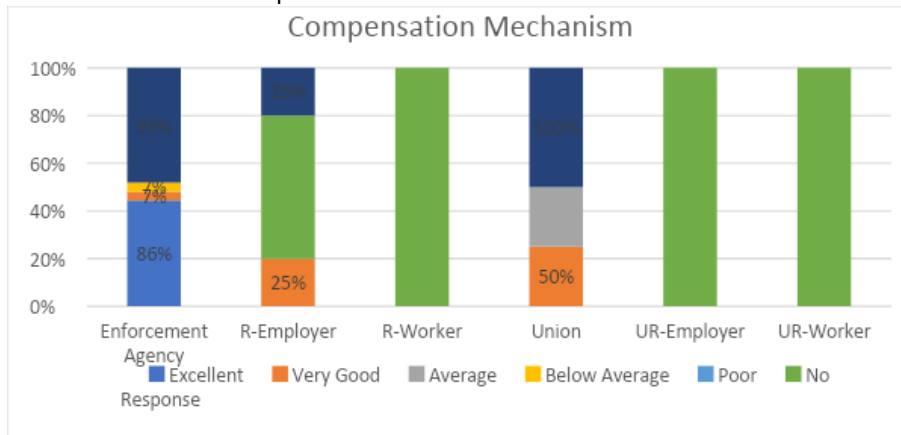


5. Availability of Services

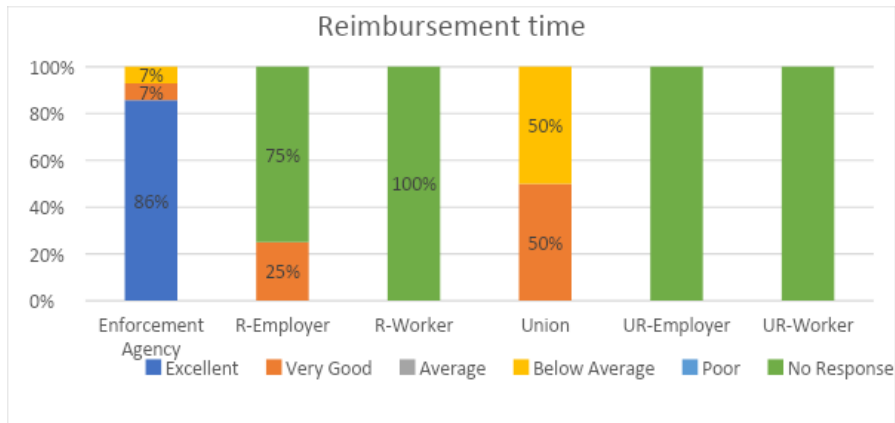


6. Perceptions of Timely Service Provision

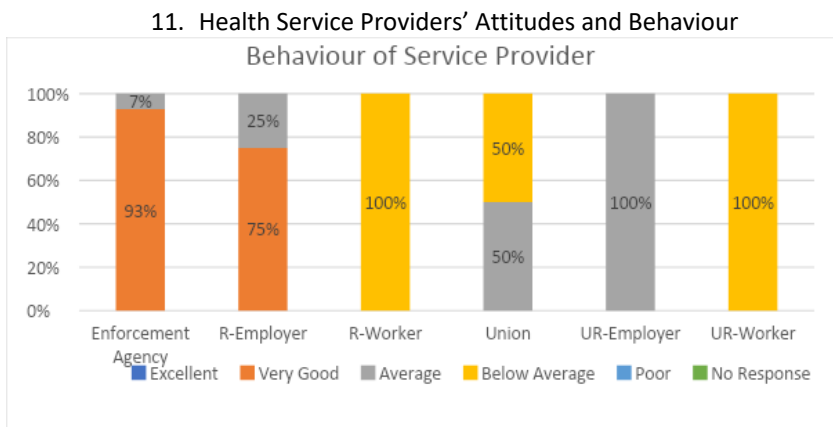
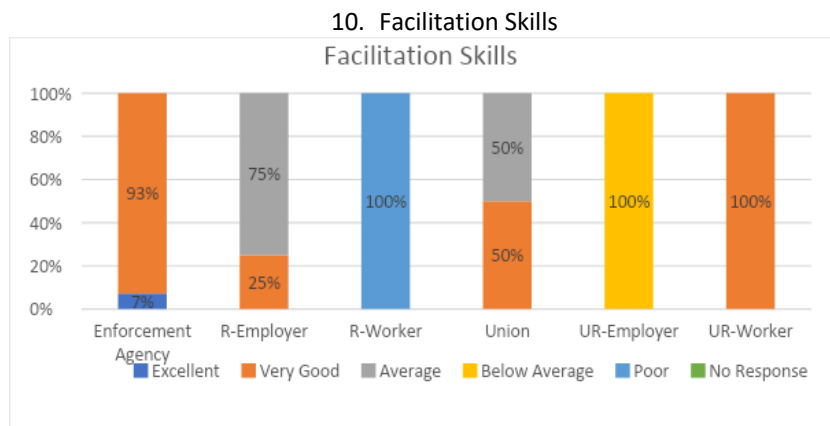
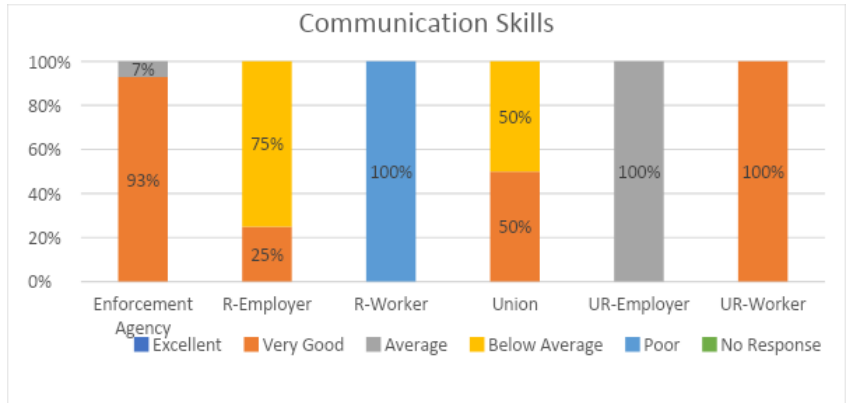
7. Compensation and Reimbursement Mechanism



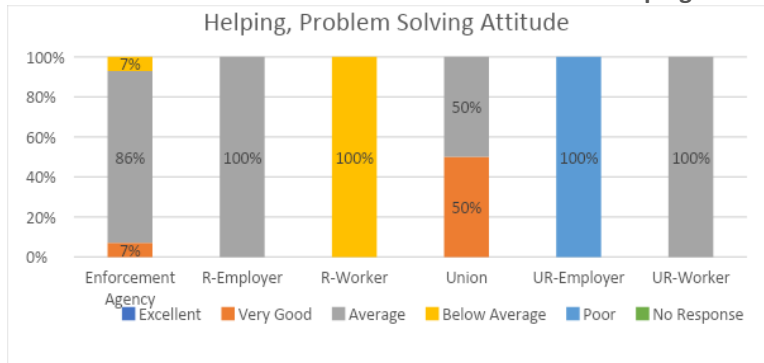
8. Reimbursement Time



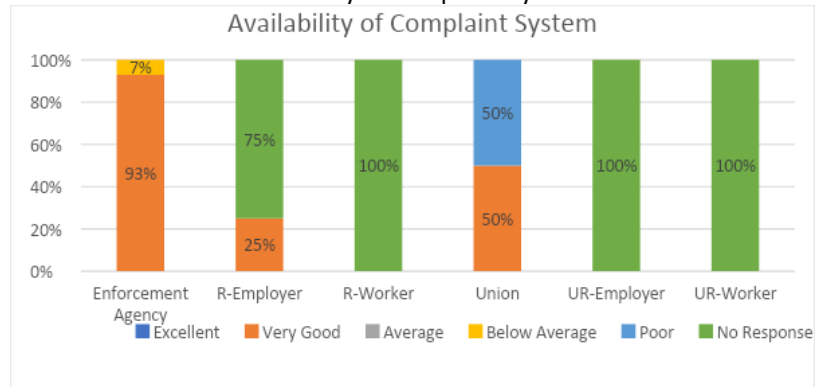
9. Communication Skills



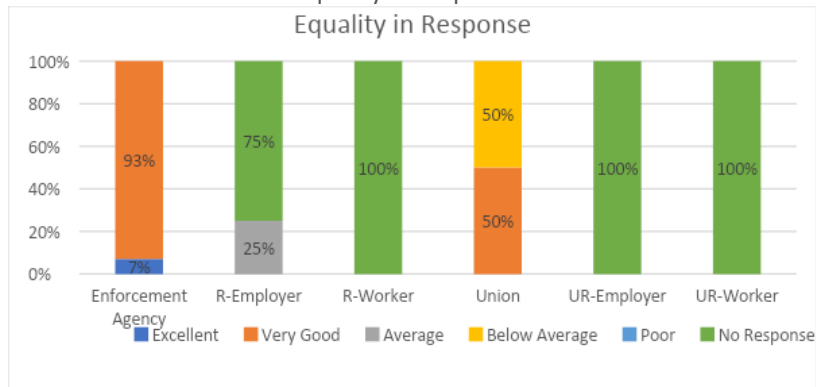
12. Inspectors' and Administration Staff Members' Attitudes to Helping and Problem Solving



13. Availability of Complaint System



14. Equality in Responses



Selected NSFF Processes

1. Medical Care Provision Process

The National Social Security Fund covers all workers, including migrant workers who are registered with NSSF. Members of NSSF receive medical care, both for work and non-work related matters, invalidity benefits, funeral grants, and survivor pension. To claim for medical care under NSSF, the employer shall provide the nearest emergency services and transfer such employees to a health facility or polyclinic recognized by NSSF. The employee or employer pays the medical expense in advance of emergency service and transfers such employee to the nearest health facility or polyclinic. Subsequently, the employee or employer, as the case may be, is able to claim the reimbursement for the expenses of emergency service from NSSF, as shown in the figures below¹⁴.

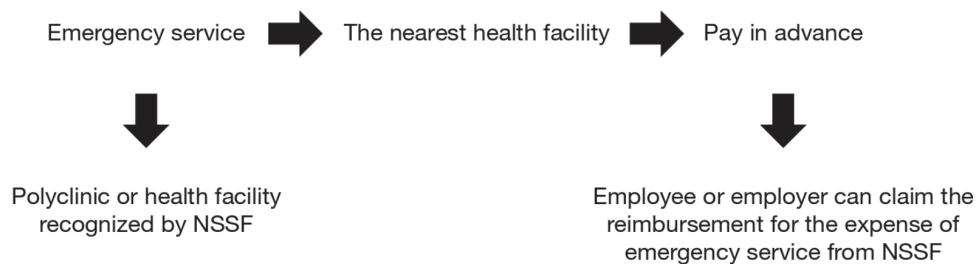


Figure 1 - Process of receiving medical care under NSSF¹⁸

2. Compensation for Injury Benefits

The process below describes the systematic approach to assess, evaluate an injured employee and compensate under the regulation.

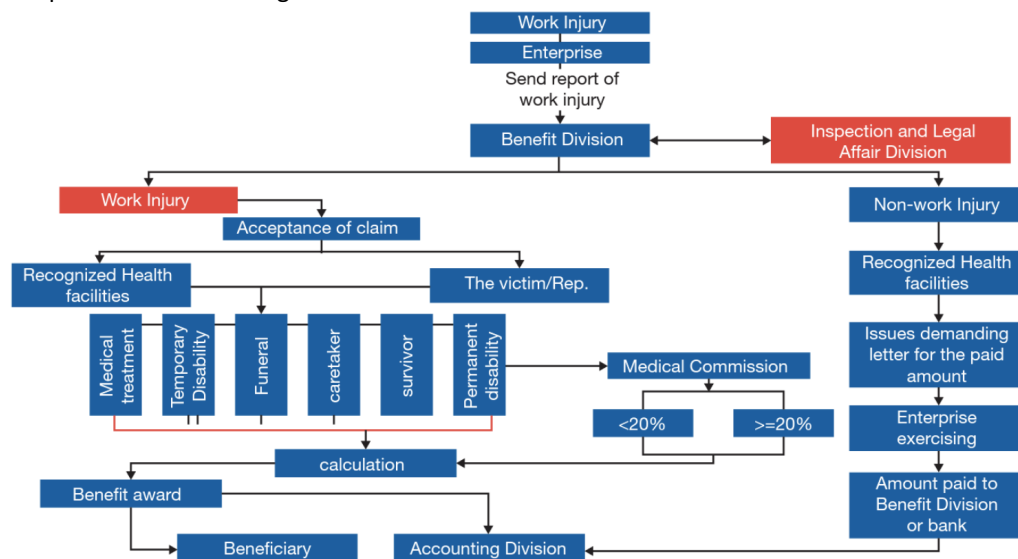


Figure 2 - Process of claiming employment-injury benefits under NSSF¹⁹

¹⁸ Policy Division National Social Security Fund, Cambodia https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/meetingdocument/wcms_434277.pdf

¹⁹ *Ibid.*

3. Compensation for Other Benefits

The compensation process other than injury or medical care is as under.

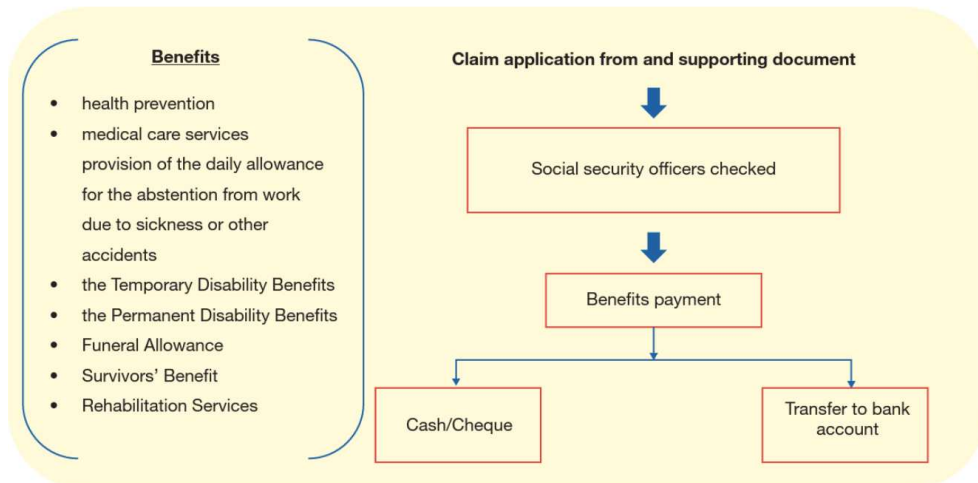


Figure 3 - Process of Claiming Other Social Security Benefits under NSSF²⁰

²⁰ TDRI, 2019