MULTIANNUAL ACTION PLAN

This document constitutes the multiannual work programme in the sense of Article 110(2) of the Financial Regulation, and action plan in the sense of Article 23(2) of NDICI-Global Europe Regulation.

1. SYNOPSIS

1.1. Action Summary Table

| 1. Title OPSYS Basic Act | EU support to promote transparency and fight against corruption  
Multiannual Action Plan in favour of Lebanon 2024 and 2025  
OPSYS business reference ACT-62526  
ABAC Commitment level 1 number: JAD.1408764 (for 2024)  
Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe) |
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>2. Economic and Investment Plan (EIP)</td>
<td>No</td>
</tr>
<tr>
<td>EIP Flagship</td>
<td>No</td>
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<tr>
<td>3. Team Europe Initiative</td>
<td>No</td>
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<tr>
<td>4. Beneficiary of the action</td>
<td>The action shall be carried out in Lebanon</td>
</tr>
<tr>
<td>5. Programming document</td>
<td>Lebanon Multiannual Indicative Programme 2021-2027¹</td>
</tr>
</tbody>
</table>
| 6. Link with relevant MIP(s) objectives/expected results | PRIORITY 1: Enhancing Good Governance and Supporting Reforms  
R2.1 Integrity of the public administration safeguarded, mainly in the area of public human resources management  
R2.2 Transparency in public administration systems, mainly in the area of public procurement at central and local level and access to public information enhanced |

¹ C(2022)8363 final of 24/11/2022
R2.3 Accountability of the administration by reinforcing the role of oversight bodies in fighting and preventing corruption strengthened

### PRIORITY AREAS AND SECTOR INFORMATION

<table>
<thead>
<tr>
<th>7. Priority Area(s), sectors</th>
<th>MIP Priority Area 1: Enhancing good governance and supporting reforms DAC Code: 151: Government &amp; Civil Society - General</th>
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<tbody>
<tr>
<td>8. Sustainable Development Goals (SDGs)</td>
<td>Main SDG (1 only): SDG 16: Peace, Justice and Strong Institutions Other significant SDGs (up to 9) and where appropriate, targets: SDG 5: Gender Equality SDG 10: Reducing inequalities</td>
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<td>9. DAC code(s)</td>
<td>151: Government &amp; Civil Society – General (100%) 15110: Public Sector Policy and Administrative Management (80%) 15113: Anti-corruption Organisations and Institutions (20%)</td>
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<td>10. Main Delivery Channel</td>
<td>20000 – Non Governmental organisations (NGOs) and Civil society</td>
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<td>11. Targets</td>
<td>☐ Migration ☐ Climate ☐ Social inclusion and Human Development ☒ Gender ☐ Biodiversity ☒ Human Rights, Democracy and Governance</td>
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<td>12. Markers (from DAC form)</td>
<td>General policy objective</td>
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<tr>
<td>Aid to environment</td>
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<tr>
<td>Gender equality and women’s and girl’s empowerment</td>
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<td>Reproductive, maternal, new-born and child health</td>
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<td>Disaster Risk Reduction</td>
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<td>Climate change adaptation</td>
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<td>Policy objectives</td>
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<td>-------------------------------------------------------</td>
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<td>EIP Flagship</td>
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<td>energy</td>
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<td>environment, climate resilience</td>
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<td>health</td>
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<td>education and research</td>
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<tr>
<td>Migration @</td>
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Reduction of Inequalities ☒
COVID-19 ☒

**BUDGET INFORMATION**

<table>
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<tr>
<th>14. Amounts concerned</th>
<th>Budget line(s) (article, item): 14.020110 – Southern Neighbourhood</th>
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<tr>
<td></td>
<td>Total estimated cost: EUR 11 500 000.00 EUR</td>
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<tr>
<td></td>
<td>Total amount of EU budget contribution EUR 11 500 000.00</td>
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**MANAGEMENT AND IMPLEMENTATION**

<table>
<thead>
<tr>
<th>15. Implementation modalities (management mode and delivery methods)</th>
<th>Direct management through:</th>
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<tbody>
<tr>
<td></td>
<td>- Grants</td>
</tr>
<tr>
<td>Indirect management with the entity to be selected in accordance with the criteria set out in section 4.3.2</td>
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</table>

**1.2. Summary of the Action**

Lebanon has been grappling with an extensive financial crisis since late 2019, exacerbated by the COVID-19 pandemic, the Beirut Port explosion, and more recently the spillover effect of the Israel-Hamas war on the country’s southern border. The crisis has severely impacted the economy and society, leading to a progressive collapse of the public administration and the decline in basic public services provision. Corruption, deeply rooted in the country's public and private sectors, has further worsened governance and service delivery.

Recent cases of illicit enrichment among public servants have contributed to service disruptions and public distrust. In addition, public administration is weak and inefficient due to outdated management practices, sectarian influences, and inadequate accountability mechanisms.

While legal frameworks such as the National Anti-Corruption Strategy have been approved and dedicated institutions such as the National Anti-Corruption Commission have been established, their effective implementation is still a challenge and needs further support.

The Action is therefore proposed, to tackle corruption and improve governance in Lebanon through the following:

1. Supporting the implementation of the National Anti-Corruption Strategy across the Lebanese public administration (outcome 1)

2. Supporting the implementation of measures to fight and prevent corruption in a selected administration that provides public services to the citizens (outcome 2).

Implementing measures to fight and prevent corruption, both at the legal/institutional level, and at the level of public service delivery, will rebuild trust between the government and citizens, contributing to socio-economic development and stability in Lebanon. Accordingly, this Action aims to improve the accessibility and quality of public services while respecting the principles of transparency, integrity and accountability through the establishment of a model public administration that serves as champion in implementing inclusive anti-corruption measures.
1.3. Beneficiary of the action

The Action shall be carried out in Lebanon which is included in the list of ODA recipients.

2. RATIONALE

2.1. Context

Since late 2019, Lebanon has been facing an unprecedented crisis, which has led to a dramatic economic contraction, a large increase in poverty, unemployment and brain drain. In March 2020, Lebanon defaulted on its Eurobonds which was followed by a deep recession, a dramatic fall in the value of the Lebanese currency and triple digit inflation. The deteriorating economic situation has hit the public sector to an extent that it is visibly disintegrating. Public authorities lack the necessary funds to maintain operations and to pay their staff more than symbolic salaries. The COVID-19 pandemic and the August 2020 port of Beirut explosion have compounded the crisis.

The crisis has had devastating effects on the country's economy and its people, resulting in a massive impoverishment of the middle classes. The public sector has been particularly hard hit with the bulk of the labour force still paid in Lebanese lira, suffering from plummeting purchasing power. Many highly qualified civil servants have left or are leaving for better paid jobs in the private sector or migrating abroad in search of better opportunities which led to vacancies in critical managerial and technical positions, which cannot be filled due to an across-the-board recruitment freeze. In addition, the remaining public servants are operating on rotational basis and public administrations are only open twice or three times a week. The devaluation of Lebanese Lira has not only affected the human capital but also the budget allocated to each public administration. As a result, public administrations cannot cover their operating costs such as maintaining IT equipment and servers. The failure to maintain IT equipment has led to data vulnerability, and potentially resulting in data loss. All of this has caused huge delays in providing public services and at times, complete service disruption.

The current economic crisis in Lebanon is a result of a complex set of factors, including political instability, corruption, and mismanagement of public finances. The economic contraction has resulted in a sharp increase in unemployment, poverty, and inflation, making it difficult for the government to deliver essential services and for the people to access basic necessities. In addition, the 2020 default on public debt cut Lebanon’s access to financial markets. In 2021, the devaluation of the national currency against the US dollar accelerated, affecting dramatically an economy highly dependent on imports. The Central Bank and the banking sector severely restricted access to people’s savings and limited cash withdrawals. Subsidies (food, gasoline, medications) were lifted abruptly. Exacerbated by currency depreciation and rapid dollarisation, inflation averaged at 222.4% in 2023 and is expected to decrease in the coming years. Although the World Bank has refrained from forecasting for 2024, citing high uncertainty, the economy is nonetheless expected to recover modestly, amidst a global economic slowdown and protracted regional conflict. Essential reforms, including those agreed upon with the IMF in the April 2022 Staff-Level Agreement (aimed to address inter alia banking sector restructuring and fiscal policy), have largely not been implemented. The banking system is dysfunctional, and the economy relies on cash.

Lebanon's leadership has inadequately addressed the crises due to a lack of consensus. The Council of Ministers operates in a caretaker capacity since May 2022, with no consensus on a presidential candidate since November 2022. The absence of a Head of State hinders government formation, causing a political vacuum. It also hinders legislative process. Some of the political parties consider that until a President is appointed, the Parliament is only an electoral body and can only legislate in emergency cases. Since November 2022, there have been only five legislative sessions with twelve unsuccessful electoral sessions to elect a President.
Lebanon has already started to feel the impact of the Israel-Hamas war in terms of hostilities at the southern border. The World Bank assesses that Lebanon is the hardest hit among the neighbouring countries by the conflict. It is estimated that the real GDP growth has contracted by 0.6 percent to 0.9 percent in 2023, depending on the extent of the tourism contraction, reversing the positive pre-conflict baseline. Military operations unfolding along Lebanon’s southern border have already caused the internal displacement of 93,040 persons as of May 2024.

Corruption has been a longstanding issue in Lebanon, since long before 2019. Both the public and private sectors have been affected by corruption, which infiltrates all levels of society, as reflected by the country’s consistently low scores on global and regional average performances in most areas of governance such as the World Bank’s Worldwide Governance Indicators where Lebanon scores 13.68% on accountability and 7.55% on governance effectiveness\(^2\). The poor quality of public services and inefficiencies in the public administration result in significant time and resources wastage by citizens and businesses alike. Moreover, these conditions create fertile ground for further corruption to flourish.

In response to the multifaceted crises, including in particular the Beirut Port explosion of 4 August 2020, the European Union (EU), in partnership with the United Nations (UN) and World Bank (WB) developed, in close cooperation with civil society, Lebanon’s government and the international community, the Reform, Recovery and Reconstruction Framework (3RF). Initially, the 3RF was established to support reconstruction efforts following the Port of Beirut Blast, while also aiming to foster reforms in areas highlighted by the explosion’s aftermath, such as justice and good governance. However, due to the effective collaboration among donors, government entities and civil society under this framework, its scope has since been expanded to address broader challenges beyond the immediate aftermath of the Beirut Blast.

Achieving progress in the fight against corruption hinges on the implementation of the National Anti-Corruption Strategy 2020-2025 adopted in 2020. This strategy includes seven strategic objectives aiming to i) complete and activate specialised anti-corruption legislation, ii) safeguard integrity in public human resource management, iii) enhance integrity in public procurement, iv) strengthen the role of the justice system in anti-corruption, v) strengthen the role of the oversight institutions in anti-corruption, vi) enhance public participation in promoting a culture of integrity, and vii) integrate corruption prevention measures at sectoral level.

The adoption and enactment of specialised reform laws since 2018, such as the Access to Information Law, the Illicit Enrichment Law, the Whistle-blowers Protection Law as well as the adoption of the new Public Procurement Law, represent positive steps. Furthermore, the establishment of the National Anti-Corruption commission (NACC), the appointment of its members as well as the adoption of its by-laws show the government commitment to combatting and preventing corruption.

However, there has been limited targeted effort on integrating corruption prevention measures in service delivery. To address this gap, the proposed action will concentrate on continuing the support to the implementation of the National Anti-corruption Strategy as whole, and in implementing pillar vii) “integrate corruption prevention measures at sectoral level” of the National Anti-Corruption Strategy. This action will on the one hand support the government’s efforts in implementing the objectives of the National anti-corruption Strategy across the Lebanese public administrations, and on the other hand target a specific service-delivery public entity by implementing measures to enhance its governance systems and integrate corruption prevention measures, eventually leading to a more efficient and accessible public service. This, in turn, will positively impact the lives of citizens and contribute to rebuilding trust between the government and its citizens.

The action falls under priority one of the MIP “Enhancing good governance and supporting reforms”. The action is in line with the European Commission’s Priority “Promoting our European Way of Life”, in particular the policy area “Rule of law”, with the 2017 European Parliament Resolution “on corruption and human rights in third countries”, as well as the Joint Communication on the fight against corruption of 3 May 2023. It is also aligned with the Joint Communication “Renewed Partnership with the southern Neighbourhood – A new Agenda for the Mediterranean”, in particular the policy area of Human development, good governance and the rule of law and its Flagship 2 – “Human rights, the rule of law, and modern, effective administrations, governance and accountability”. The action will contribute to the SDG 16 “Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels”.

In terms of added value, the EU has a rich history of engagement in Lebanon, particularly in administrative reform and combating corruption. EU interventions have focused on reinforcing institutional capacity and promoting accountability and transparency by strengthening the role and mandate of oversight bodies. This approach has been instrumental in laying the groundwork for a more transparent and accountable public administration.

### 2.2. Problem Analysis

#### Short problem analysis

The public administrations in Lebanon are characterised by old-fashioned management, and the use of complicated procedures and obsolete tools, techniques and methodologies. The sectarian regime, nepotism and confessional power sharing running across all government ministries and institutions create inefficiencies in the public administrations, and misuse of public funds.

The weak decision-making processes, the absence of clear vision about their role, the lack of transparency and accountability have led to increased corruption and weakened the public service delivery.

The accountability system is ineffective and needs efforts to be strengthened. The oversight bodies of the public administrations are unable to cover all areas and are suffering from limited resources. Hence, citizens sometimes are compelled to resort to corruptive practices to access their basic rights.

In this context, the approval of the National Anti-Corruption Strategy 2020-2025 (NACS) in 2020, the adoption of a new Public Procurement Law in 2021, the enactment of the Illicit Enrichment Law in 2020, and the establishment of the National Anti-Corruption Commission in 2022 are important and encouraging steps in the fight against corruption. Nevertheless, the enactment of the institutional framework on accountability and transparency has been challenging, and needs time and further support to show its results to impact citizens’ life and to effectively curb corruption.

Only two months after the enactment of the Illicit Enrichment Law in 2020 a number of reports of illicit enrichment began to surface, namely involving civil servants from public administrations (i.e. the cadastre office, the vehicle registration centres, the road traffic department and others), and a wave of corruption-related arrests took place. While on the one hand, these events proved the problem’s magnitude and the initial effectiveness of the new legal framework, on the other hand they resulted in those institutions being severely understaffed and unable to provide the related services, given the state’s concomitant lack of financial resources and organisational capacity to restructure them.

In this critical situation, tangible actions are needed to demonstrate the commitment of the government to fight corruption and enhance the accessibility and quality of public services. This is crucial for the proper

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implementation of the legal framework established to strengthen the accountability and transparency systems, to build a culture of integrity, as well as to regain citizens' trust and ensuring the population's active contribution to rebuilding an effective public administration.

Corruption and gender inequality are in many ways closely connected. Men and women are affected by corruption in different ways, and are subjects and objects of different corrupt practices and behaviours. Gender inequality breeds corruption and vice versa: corruption tends to exacerbate gender inequalities.\(^4\)

Studies have shown that corruption in public service delivery affects women disproportionately more than men due first to the higher vulnerability for women living in poverty and second because women in general perceive corruption levels as worse, and are more likely to be in favour of punishing corrupt behaviour, compared to men\(^5\). With women’s rights already restricted because of gender inequalities, corruption creates additional obstacles for them to access public goods and rights and to participate in politics and governance processes.\(^6\)

Furthermore, corruption undermines the welfare of women, children and vulnerable groups since it reduces public revenues, and affects spending on healthcare, family benefits and other social services on which women, children and most vulnerable population rely the most on.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action.

The main stakeholders and beneficiaries of proposed action will be the selected administration and ministries involved. The final beneficiaries are the citizens of Lebanon, who will directly benefit from the action by accessing a more efficient and effective public service.

**Prime Minister Office**

The Prime Minister’s Office is the constitutionally empowered body for the coordination of government activities, policy formulation, and overall supervision of public administration. However, Lebanon’s sectarian system hampers the effective functioning of its responsibilities. It has limited capacity in monitoring and evaluation, as well as coordination of reform implementation. It will play a critical role in action by ensuring alignment of reforms with national priorities and coordinate efforts among various public institutions.

**Office of Minister of State for Administrative Reforms**

The Office of the Minister of State for Administrative Reforms (OMSAR) is a key player in the fight against corruption as it has been designated as the focal point for the National Anti-Corruption Strategy. OMSAR is a government organisation in charge of assessing the reform and development needs of Lebanese administrations and public institutions; leading administrative reform and e-government strategies; identifying, implementing and evaluating reform and development projects; conducting organisational and legal studies; streamlining work procedures; and training civil servants. However, OMSAR lacks the legal mandate to enforce the implementation of reform priorities within the Lebanese administration, which affects the sustainability of efforts to advance the reform process.

**Government institutions providing public services**

Most institutions are understaffed and underfunded and this has been exacerbated by the economic crisis. They lack resources to modernise and simplify their procedures, to implement a modern management technique, to automate their workflows, and to promote transparency and accountability. The lack of political stability and

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\(^4\) GENDER AND CORRUPTION / MARCH 2015/SIDA  
\(^5\) Agerberg, Mattias (2014) "Perspectives on Gender and Corruption” in The Quality of Governance Working Paper Series  
\(^6\) Transparency International, 2008
consensus has slowed down major political and economic reforms, causing among others a low level of basic service delivery to the Lebanese population.

The Central Inspection Board (CIB)
The Central Inspection Board (CIB) was established in 1959 and is a key institution in fighting and preventing corruption. It is in charge of monitoring public administrations, institutions and municipalities as well as of improving their administrative work methods. However, being under the umbrella of the Council of Ministers, it regularly suffers from political deadlocks. The CIB is currently supported by the EU funded programme ‘Supporting progress in key areas of public administration reform’, which is implemented by Expertise France.

The Lebanese Court of Audit (CoA)
The Lebanese Court of Audit (CoA) was established in 1951 under the Public Accounting law as a Supreme Audit Institution with judicial powers modelled on the European Court of Auditors. The Court is in charge of administrative control – prior control on public financial operations (revenue and expenditures), jurisdictional supervision over the expenditure of public funds and provides advisory opinion on demand. The mandate and the role of the CoA are outdated. Under the umbrella of the Prime Minister, it does not enjoy full independence. The CoA is currently supported by the EU funded programme ‘Supporting progress in key areas of public administration reform’, which is implemented by Expertise France.

The Civil Service Board (CSB)
The Civil Service Board (CSB) has been established in 1959 with extensive powers over personnel administration in ministries and autonomous agencies - with the exception of the army, security forces, and the judiciary; and 10 large municipalities. The CSB monitors the implementation of the Personnel Law. The CSB was intended to play a dominant role in protecting the public services from undue political interference such as favouritism in personnel recruitment and promotion, and in improving and modernising human resource management. The effectiveness of the CSB to apply and enforce personnel rules and regulations without discrimination is however undermined as in cases of dispute the Council of Minister’s decision prevails. A draft law is in preparation to reinforce its independence. The CoA is currently supported by the EU funded programme ‘Supporting progress in key areas of public administration reform’, which is implemented by Expertise France.

The National Anti-Corruption Commission (NACC)
The National Anti-Corruption Commission has been established by law in 2021 and the nomination of its six members approved by the Council of Ministers in 2022. The Commission will work towards implementing existing and new legislation. The adoption of the law allowing the Commission to access the bank accounts of high-ranking public officials, including Ministers, will be a major milestone. The Commission finalised reviewing their internal regulations and bylaws that were prepared as part of the work undertaken by a task force working on area 1 – Legal framework of the National Anti-Corruption Strategy. The NACC is currently supported by two EU funded programme, Anti-corruption for Trust, which is implemented by United Nations Development Programme (UNDP) and ‘Supporting progress in key areas of public administration reform’, which is implemented by Expertise France.

Civil Society Organisations
Lebanon has a vibrant, diverse and active civil society, with the number of registered organisations reaching more than 8,000 according to some estimates. CSOs represent a wide range of voices in reform and development debates, particularly on the vulnerable and marginalised population, while also taking responsibility for the delivery of services. They represent Lebanese citizens calling for better services delivery, reform, political accountability and transparency and have a key role in monitoring state institutions’ activities.
2.3. Lessons Learned

The EU, along with several other donors, has been traditionally supporting the national efforts in the area of good governance and anti-corruption. This support has focused on strengthening the institutions that play a major role in enhancing transparency and accountability; on reinforcing the related legal framework; on pushing for the enactment of specialised laws to fight corruption; and on implementing the seven pillars of the National Anti-Corruption Strategy.

The EU, along with Denmark, funded a program implemented by UNDP aimed at assisting the government in achieving three strategic objectives outlined in the NACS: i) complete and activate specialised anti-corruption legislation ii) enhance public participation in promoting a culture of integrity, and iii) integrate corruption prevention measures at sectoral level.

Additionally, under the 2022 Annual Action Plan, the EU is funding a programme implemented by Expertise France, which focuses on NACS pillars, i) safeguard integrity in public human resource management, ii) enhance integrity in public procurement, iii) strengthen the role of the oversight institutions in anti-corruption, iv) enhance public participation in promoting a culture of the NACS.

From past interventions, the following arose as the main hindering factors for achieving a lasting impact: i) slow pace in reform formulation and adoption by parliament, and weak implementation by the government; ii) lack of government ownership and sustainability of interventions iii) inadequate inter-institutional co-ordination, and cooperation among government institutions; iv) limited coordination among donors, which created duplications rather than complementarity; v) insufficient government follow-up, reporting and monitoring mechanism of strategies.

This Action will continue the EU support to reinforce the legal framework. It will also support a selected institution that delivers public services directly to the citizens, which has been proven to be prone to corruption, and whose management is willing and committed to implement anti-corruption and efficiency-inducing measures. This will ensure the authority’s ownership in the process as well as a direct positive impact on citizens’ life through the improvement in service delivery. The latter effect will also allow better EU visibility, as compared to previous and ongoing initiatives focusing on legislative work.

The deliverables from the ongoing EU support to the implementation of the National Anti-Corruption Strategy, such as the corruption risk assessment methodology and the methodology for the implementation of the Access to Information Law, will be implemented in the selected administration. Moreover, the tools and methodologies used to strengthen the role of oversight bodies within the framework of the EU programme “Supporting progress in key areas of public administration reform”, will be used by oversight bodies to promote accountability and transparency in the selected administration.

Coordination on initiatives and reforms among donors and within the public administration will also be promoted through the regular meetings of the dedicated 3RF Working Groups, which offers a joint platform of support to relevant monitoring policies, notably the National Anti-Corruption Strategy.

3. DESCRIPTION OF THE ACTION

3.1. Objectives and Expected Outputs

The Overall Objective/Impact of this action is to strengthen accountability and prevent corruption in Lebanon.

The Specific Objectives (Outcomes) of this action are:
1. To improve the implementation of an institutionalised and targeted approach to prevent and combat corruption.
2. To improve equal and inclusive access of citizens in their diversity to transparent, quality public services.

The Outputs to be delivered by this action contributing to the corresponding Specific Objectives (Outcomes) are:

1.1 Contributing to Outcome 1: Effective, co-ordinated and monitored implementation of the National Anti-Corruption Strategy (NACS)
1.2 Contributing to Outcome 1: Enhanced implementation of measures and specialised laws to fight and prevent corruption
1.3 Contributing to Outcome 1: Strengthened capacities of Institutions mandated to fight and prevent corruption.

2.1 Contributing to Outcome 2: Strengthened capacities of the selected administration on strategic planning and monitoring taking into account the needs and interests of all groups in the society, with a focus on women and people with disabilities.
2.2 Contributing to Outcome 2: Strengthened archiving, management and financial capacities and tools of the selected administration, in line with international standards and anti-corruption measures.
2.3 Contributing to Outcome 2: Improved automation of the services of the selected administration ensuring inclusiveness.
2.4 Contributing to Outcome 2: Strengthened capacities of the selected administration to report to the oversight bodies and to the public, and to implement the recommendations of oversight bodies.

3.2. Indicative Activities

Activities related to Output 1.1:
- Provide technical assistance to support government stakeholders in reporting and monitoring the implementation of the National anti-corruption Strategy
- Review of the timeline of the NACS and amend it according to the progress achieved
- Provide technical assistance to draft annual work plans for the implementation of the NACS
- Conduct capacity building activities and training for governmental and non-governmental stakeholders on strategic planning, monitoring and evaluation, and the substantive areas of the NACS.
- Reporting to the wider public about the progress and the achievements of the NACS

Activities related to Output 1.2:
- Support to the responsible committees with advice on legislative drafting, and on developing and overseeing implementation of anti-corruption laws.
- Develop and oversee execution decrees of selected anti-corruption laws
- Conduct capacity building activities for governmental and non-governmental stakeholders on the development and implementation of legislative & regulatory measures to fight and prevent corruption.
- Organise policy dialogues on corruption prevention at sectoral level.
- Develop plans for managing risk of corruption in key selected sectors.
- Implement solutions for managing corruption risks in selected sectors
- Disseminate and report to the wider public about progress in the implementation of laws and measures to fight corruption.

Activities related to Output 1.3:
- Provide Technical Assistance to support Institutions mandated to fight and prevent corruption.
- Conduct capacity building activities to staff of Institution mandated to fight and prevent corruption
- Implement measures proposed in the context of the capacity building including public outreach activities.
- Procure the required tools, equipment and works needed to implement measures to prevent corruption, and modernise the work Institutions mandated to fight corruption.

Activities related to Output 2.1:
- Conduct an assessment of the legal framework, operations and procedures of the selected administration including a corruption risk assessment
- Draft, with a gender perspective, the strategic plan of the selected administration including defined objectives, performance indicators and action plans
- Draft annual action plans and conduct capacity building activities on strategic planning and monitoring and evaluation.

Activities related to Output 2.2:
- Design a management system that integrates anti-corruption measures
- Design an archiving system that promotes transparency and facilitate the implementation of the access to information law
- Deploy a financial system that respects international standards
- Procure the required tools, equipment and works needed to implement measures to prevent corruption, modernise the work of the selected administration and make it accessible to all citizens.
- Conduct capacity building activities and trainings on the various systems implemented
- Conduct capacity building activities and trainings on the implementation of specialised laws that promote transparency and accountability.

Activities related to Output 2.3:
- Assess and collect data related to all procedures related to the public services delivered by the selected administration, and on the impact of the services delivered (disaggregated by sex)
- Simplification of procedures in order to facilitate the accessibility and the quality of public services provided by the selected administration.
- Automatisation and digitalisation of the procedures to make them accessible to all citizens via an administration portal.
- Procure the required tools, equipment and works needed to digitalise the procedures and make it accessible and inclusive.
- Conduct capacity building and trainings on the simplified and automated procedures.

Activities related to Output: 2.4:
- Draft annual reports, activity reports and financial reports while respecting international standards
- Standardise and organise the data and reports that should be provided to oversight bodies and to the public
- Implement the recommendations of the missions conducted by oversight bodies.

3.3. Mainstreaming

Environmental Protection, Climate Change and Biodiversity

Outcomes of the Environmental Impact Assessment (EIA) screening
The EIA screening classified the action as Category C (no need for further assessment). However, activities funded by the action may be legally required to do EIA. It will be ensured that an environmental statement is undertaken for all projects with significant installations.

**Outcome of the Climate Risk Assessment (CRA) screening**
The CRA screening concluded that this action is no or low risk (no need for further assessment).

**Gender equality and empowerment of women and girls**

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1. This implies that economic and social rights and the empowerment of girls and women, equal participation and leadership as well as gender dimension of digital transformation is be addressed among the specific objectives and has been mainstreamed in the Action. The Action will promote meaningful and active participation of women in decision making and in all activities. In particular the action will support the trainings and capacity building activities with a specific focus on women.

**Human Rights**

The proposed action is fully aligned to the existing EU human rights strategies and action plans. Human rights concerns are mainstreamed throughout the action and will be taken into consideration in the finalisation of the activities to be drawn up during implementation stage. The action has been designed following a “rights-based “and “leave-no-one behind” approach. It promotes equal participation of all segments of the population in the decision-making at various levels.

**Disability**

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D1; this implies that Persons with Disabilities’ concerns will be mainstreamed across the Action, in line with the 3RF process which is a based on a people-centred and inclusive approach.

**Democracy**

The main purpose of the action is to actively promote the empowerment of government, civil society and citizens. Through this Action, the EU promotes legally binding international standards to promote the respect of democracy, fundamental rights and the rule of law.

**Conflict sensitivity, peace and resilience**

This action applies conflict-sensitivity and a do-no harm approach throughout the planning and implementation of the action, and addresses related priorities and recommendations.

**Disaster Risk Reduction**

Not applicable

### 3.4. Risks and Assumptions

<table>
<thead>
<tr>
<th>Category</th>
<th>Risks</th>
<th>Likelihood (High/Medium)</th>
<th>Impact (High/Medium)</th>
<th>Mitigating measures</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Low)</td>
<td>Low)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------------------</td>
<td>------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1- External Environment</td>
<td></td>
<td>The escalation of hostilities along the Southern Border of Lebanon intensifies and extends to a nationwide scale. Activities will be adjusted to identified needs through an ongoing monitoring and maintain on standby the components that cannot be implemented until adequate conditions are in place.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1- External Environment</td>
<td></td>
<td>Political stalemate and social tensions resulting in an overall deterioration of the situation, including security. Project execution will be contingent upon the possibility to operate under the prevailing conditions counting on the commitment of the selected administration.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1- External Environment</td>
<td></td>
<td>Lack of political commitment and leadership support. The selected administration and related mandate authorities will have to demonstrate sustained commitment for reform and project implementation. The EU Delegation will continue to advocate on the need to implement the National Anti-Corruption Strategy with all relevant government stakeholders.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2- Planning, processes and systems</td>
<td></td>
<td>The selected administration lacks resources and operates in a complex legal and regulatory framework. The EU Delegation will provide the needed technical assistance, legal assistance and expertise to support undertake an in-depth analysis of the legal framework of the selected administration while involving the relevant ministry.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3- People and the Organisation</td>
<td></td>
<td>Lack of motivation and commitment of civil servants, including resistance to change. Motivation will be ensured through enhancing skills and techniques and applying modern promotion and appraisal systems.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**External Assumptions**

The Lebanese Government will continue to show its commitment to implement the National Anti-Corruption Strategy and the Government’s 2020-2030 Digital Transformation strategy, as well as reforms and modern techniques in order to facilitate the access and quality of public services.

Existing programmes funded by the EU and other donors in support of the oversight bodies will equip them with the needed tools and techniques to perform their mandate efficiently.

Stakeholders and the selected administration will show interest in implementing the action and adopting all related deliverables in order to fight corruption and enhance the accessibility and the quality of services.
The effective implementation of the action depends on a stable political and security environment in the country. In the absence of stability, the implementation of the action may be hampered, and progress may be slow or ineffective.

### 3.5. Intervention Logic

The underlying intervention logic for this action is that, on the basis of the relevant objectives set in the National Anti-Corruption Strategy 2020-2025 and its amendment, a more transparent, accountable and efficient public administration could emerge in Lebanon.

IF the implementation of the National Anti-Corruption Strategy (NACS) is effective, co-ordinated and monitored (Output 1.1), AND the anti-corruption specialised laws and measures are implemented across public administrations (Output 1.2), AND the capacities of Institutions mandated to fight and prevent corruption are strengthened (Output 1.3)

THEN, an Institutionalised and targeted approach to fight and prevent corruption across the public administration will be established (Outcome 1)

IF a clear strategy taking into account the needs and interests of all group in the society with a focus on women and people with disabilities is implemented (Output 2.1), and IF a modern management archiving, and financial in line with international standards and anti-corruption measures are installed (Output 2.2), and IF the public services are fully automated (Output 2.3), and IF reports on the activity of the administration are available and published (Output 2.4);

THEN, the quality and the accessibility of the public services delivered by the selected administration is improved (Outcome 2).

This will be under the condition that the selected administration implement and adopts the deliverables and ensure that all public servants are available and are dedicating the needed time to implement the action, and that existing programmes funded by the EU and other donors in support of the oversight bodies will equip them with the needed tools and techniques to perform their mandate efficient.

When the above holds true and provided that a stable political and security environment in the country prevails, and that Lebanese Government will continue to show its commitment to implement the National Anti-Corruption Strategy and the government digital transformation strategy, as well as reforms and modern techniques in order to facilitate the access and quality of public services;

THEN, accountability and the prevention of corruption will be strengthened, and a more transparent Lebanon will emerge (Impact).
3.6. Indicative Logical Framework Matrix
| Results | Results chain:  
|Main expected results | [maximum 10 @] | Indicators  
| [it least one indicator per expected result @] |  | Baselines  
| (2025) | Targets  
| (2030) | Sources of data | Assumptions |
|---|---|---|---|---|---|
| **Impact 1** | To strengthen accountability and prevent corruption in Lebanon | World Bank Worldwide Governance Indicators (WGI)  
Government Effectiveness *(GERF 1.22)**  
Corruption Perception Index (MIP indicator)* | 1. -1.46 (2022)  
2. 24 (2023) | 1. To be decided at inception phase  
2. To be decided at inception phase | 1. WB  
1. World Bank  
2. Transparency International | Not applicable |
| **Outcome 1** | To improve the implementation of an institutionalised and targeted approach to prevent and combat corruption | 1.1 Number of Administrations effectively implementing the objectives of the National Anti-Corruption Strategy  
1.2 Level of progress achieved in terms of UNCAC compliance (Good / Average / Poor) | 1.1 tbd  
1.2 tbd (inception phase) | 1.1.tbd (inception phase)  
1.2.tbd (inception phase) | Government reports and decisions  
UNCAC Compliance report | Risks of a deterioration in the security situation are effectively mitigated |
| **Outcome 2** | To improve equal and inclusive access of citizens in their diversity to transparent quality public services. | 2.1 Status of the model administration  
2.2 Number of people directly benefiting from EU supported interventions that aim to reduce social and economic inequality *(SP)* *(GERF 2.39)**  
2.3. Status of the strategic planning | 2.1 No public entity qualifies as a model of transparency and access to quality services  
2.2. 0 (2025)  
2.3. Strategic planning approved. | 2.1 A public entity becomes a model administration with digitalised services accessible to all citizens, including those with low digital literacy and those with disabilities.  
2.2. To be decided at inception phase  
2.3. Progress Reports on the strategic planning | 2.1. Action's M&E system based on progress report of the strategic planning.  
2.2. Administrative records of the selected administration  
2.3 Progress Reports on the strategic planning | The political environment in the country remains stable. The Lebanese Governments will continue to show their commitment to implement the National Anti-Corruption Strategy and the government digital transformation strategy. |
### Output 1.1 related to Outcome 1

1.1 Effective, co-ordinated and monitored implementation of the National Anti-Corruption Strategy (NACS)

<table>
<thead>
<tr>
<th>Sub-Output</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1.1</td>
<td>Number of NACS Progress reports approved</td>
</tr>
<tr>
<td>1.1.2</td>
<td>Number of public officials trained on monitoring and evaluation with improved skills (disaggregated by sex)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1.1</td>
<td>tbd at inception phase</td>
</tr>
<tr>
<td>1.1.2</td>
<td>tbd at inception phase</td>
</tr>
</tbody>
</table>

### Output 1.2 related to Outcome 1

1.2 Enhanced implementation of measures and specialised laws to fight and prevent corruption (Access to information, illicit enrichment, corruption risk management etc…)

<table>
<thead>
<tr>
<th>Sub-Output</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2.1</td>
<td>Number of measures (decrees, guides, websites etc) developed and deployed with project support</td>
</tr>
<tr>
<td>1.2.2</td>
<td>Number of sectors with corruption risk assessments and mitigation plans completed</td>
</tr>
<tr>
<td>1.2.3</td>
<td>Number of public officials trained on corruption risk assessment with improved skills (disaggregated by sex)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2.1</td>
<td>tbd during inception phase</td>
</tr>
<tr>
<td>1.2.2</td>
<td>tbd during inception phase</td>
</tr>
<tr>
<td>1.2.3</td>
<td>to be determined during inception phase</td>
</tr>
</tbody>
</table>

The work with the oversight bodies through the complementary EU funded programme and other programmes is ongoing and oversight bodies are equipped with the needed tools and techniques to perform their mandate efficiently.

The selected administration implement and adopts the
<p>| Output 1.3 related to Outcome 1 | 1.3 Strengthened capacities of Institutions mandated to fight and prevent corruption. | 1.3.1 Status of tools and Equipment provided to Institutions mandated to fight and prevent corruption | 1.3.2 Number of public officials trained on subject related to fighting and preventing corruption with improved skills (disaggregated by sex) | 1.3.1 tbd during inception phase | 1.3.2 tbd during inception phase | 1.3.1 tbd during inception phase | 1.3.2 tbd during inception phase | 1.3.1 Project Progress reports- acceptance of equipment and tools deliveryables and ensure that all public servants are available and are dedicating the needed time to implement the action. | 1.3.2 Based on pre post training plans |</p>
<table>
<thead>
<tr>
<th>Output 2.1 related to Outcome 2</th>
<th>2.1 Capacities of the selected administration on strategic planning and monitoring taking into account the needs and interests of all group in the society with a focus on women and people with disabilities is strengthened</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1.1 Number of countries supported by the EU to (a) develop and/or revise digital-related policies/strategies/laws/regulations (GERF 2.10)</td>
<td>2.1.1 - No Strategy related to digitalisation and to strategic planning available 2.1.2 0</td>
</tr>
<tr>
<td>2.1.2 Number of public officials trained on strategic planning with improved skills (disaggregated by sex)</td>
<td>2.1.1-Strategy that takes into accounts the needs of all citizens is available. 2.1.2- To be decided at inception phase</td>
</tr>
<tr>
<td>Output 2.2 related to Outcome 2</td>
<td>2.2 Archiving, management and financial capacities and tools of the chosen administration are strengthened in line with international</td>
</tr>
<tr>
<td>2.2.1 Status of a Modern Management System</td>
<td>2.2.1-No management system available 2.2.2-No archiving system available 2.2.3-No digitalised</td>
</tr>
<tr>
<td>2.2.2 Status of the Archiving system</td>
<td>2.2.1-A modern Management system introduced with EU support. 2.2.2- A digital and paper archiving system deployed</td>
</tr>
<tr>
<td>2.2.3 Status of the Financial system</td>
<td>2.2.1, 2.2.2, 2.2.3: Intervention's progress reports and supporting documents Acceptance of supplies 2.2.4 based on pre and post training test</td>
</tr>
<tr>
<td>Output 2.3 related to Outcome 2</td>
<td>standards and anti-corruption measures.</td>
</tr>
<tr>
<td>Output 2.4 related to Outcome 2</td>
<td>2.3 Automation of the services of the selected administration is strengthened ensuring inclusiveness measures.</td>
</tr>
<tr>
<td>Output 2.4 related to Outcome 2</td>
<td>2.4 Capacities of the chosen administration to report to the oversight bodies and to the public and to implement the recommendations of oversight bodies is strengthened</td>
</tr>
</tbody>
</table>
4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing Agreement

In order to implement this action, it is envisaged to conclude a financing agreement with the partner country.

4.2. Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 48 months from the date of entry into force of the financing agreement.

Extensions of the implementation period may be agreed by the Commission’s responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

4.3. Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures.  

4.3.1. Direct Management (Grants)

4.3.1.1. Grants

a) Purpose of the grant(s)

The grant will contribute to achieving Outcome 2 of the Action.

b) Type of applicants targeted

• Non-profit-making organisations

c) Justification of a direct grant

Under the responsibility of the Commission’s authorising officer responsible, the grant may be awarded without a call for proposals to a non-profit making organisation selected using the following criteria:

1- Specific expertise: expertise in the implementing principles of public administration reforms, digitalisation and fighting corruption. In addition, the capacity to access and contract different types of expertise in the field of anti-corruption, administrative reform and digitalisation

2- Experience in generating evidence-based analyses, recommendations, and strategies for good governance, anti-corruption and citizenship

3- Logistical and/or management capacities: experience in the implementation of programs/activities to modernise public administrations and public functions

4- Experience in the country: adequate capacities to engage with a variety of Lebanese stakeholders across the political spectrum and civil society in order to implement and advocate for the

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7 www.sanctionsmap.eu Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.
implementation of reform measures, and successful track record and demonstrated engagement in working with Lebanese public administrations.

Under the responsibility of the Commission’s authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified because the country is in a crisis situation (category (b) “in other exceptional and duly substantiated emergencies” of Art. 195 of the Financial Regulation) as referred to in Article 2(21) of the Financial Regulation.

The part of the action under the budgetary envelope reserved for grants may, partially or totally and including where an entity is designated for receiving a grant without a call for proposals, be implemented in indirect management with an entity, which will be selected by the Commission’s services using the criteria defined in section 4.3.1.1.c above.

4.3.2. Indirect Management with a pillar-assessed entity

A part of this Action may be implemented in indirect management with a pillar-assessed entity, which will be selected by the Commission’s services using the following criteria:

i) Pillar assessed entity with the necessary capacity to effectively address political, technical, logistical and institutional challenges;
ii) Sound track record in implementing projects in relation to fighting and preventing corruption and implementing Anti-Corruption Strategy;
iii) Proven experience in implementing in Lebanon actions similar to the programme proposed;
iv) Capacity to build synergies between relevant EU projects and guarantee full co-ordination with other EU bilateral and regional actions in this sector;
v) Capacity to launch tenders for procurement of contracts as well as call for proposals to mainstream oversight and civil society activities.

The implementation by this entity will entail the implementation of the activities leading to Outcome 1 of this Action.

4.3.3. Changes from indirect to direct management (and vice versa) mode due to exceptional circumstances

If the implementation modality under indirect management as defined in section 4.3.2 cannot be implemented due to circumstances beyond the control of the Commission, the modality of implementation by grants under direct management would be used according to section ‘4.3.1.’:

(a) Subject matter of the grant (s)

The grant will contribute to achieving of Outcome 1 of the action.

(b) Type of applicants targeted.

Non-profit-making organisations

If the implementation modality under direct management as defined in section 4.3.1.1.(grants)’ cannot be implemented due to circumstances beyond the control of the Commission, the modality of implementation by indirect management with a pillar-assessed entity would be used, selected using the selection criteria defined in section 4.3.1.1.c above.
4.4. Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission’s authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

4.5. Indicative Budget

<table>
<thead>
<tr>
<th>Indicative Budget components</th>
<th>EU contribution for 2024 (amount in EUR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementation modalities – cf. section 4.3</td>
<td></td>
</tr>
<tr>
<td><strong>Outcome 1</strong> and all three outputs composed of:</td>
<td>3 200 000.00</td>
</tr>
<tr>
<td><strong>Indirect management with international organisation – cf. section 4.3.2</strong></td>
<td>3 200 000.00</td>
</tr>
<tr>
<td><strong>Outcome 2</strong> and all four outputs composed of</td>
<td>8 000 000.00</td>
</tr>
<tr>
<td>Grants (direct management) – cf. section 4.3.1</td>
<td>8 000 000.00</td>
</tr>
<tr>
<td>Grants – total envelope under section 4.3.1</td>
<td>8 000 000.00</td>
</tr>
<tr>
<td>Evaluation – cf. section 5.2</td>
<td>300 000.00</td>
</tr>
<tr>
<td>Audit – cf. section 5.3</td>
<td></td>
</tr>
<tr>
<td>Strategic communication and Public diplomacy – cf. section 6</td>
<td>covered by another Decision</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>11 500 000.00</strong></td>
</tr>
</tbody>
</table>

4.6. Organisational Set-up and Responsibilities

For Outcome 1:

A Steering committee will be established to provide strategic direction and address possible implementation issues to ensure quality delivery of results.

The steering committee shall be made of:

- the Minister of State for Administrative Reform in his capacity as the Head of the Technical Anti-Corruption Committee.
- Representatives from the European Union
- Representatives from the Implementing partner
- Representatives Institutions mandated to fight and prevent corruption
- Representatives of Relevant Ministries and Civil Society Organisations and other donors.

The Steering committee will meet at least twice a year, to provide strategic guidance and recommendations on the overall project orientation, and strategic priorities.
In particular it will: provide overall guidance and strategic direction for the project; review the achievement of results, as captured in the project’s work plan; provide guidance on challenges and issues, which may arise during the implementation of the project; identify and assess risks to the project and advise on relevant approaches/strategies to address them effectively.

For Outcome 2:
A Steering Committee will be established at the time of signature of the contract foreseen for its implementation and will remain in charge for the whole duration of the implementation of the action. The Steering Committee will be mandated to provide strategic oversight and guidance for the implementation of the project and oversee the implementation of corrective measures when needed. The project's Steering Committee shall meet at least twice a year.

The project's Steering Committee shall be made up of:
- senior representatives from the selected beneficiary administration;
- senior representatives from line Ministries and from OMSAR as the president of the technical committee for the implementation of the National Anti-Corruption Strategy and the Digital Transformation strategy;
- senior representatives of the EU (the Contracting Authority)

Any other co-opted participant(s) may attend on ad hoc basis as observers, inter alia Lebanese civil society organisations, supervisory or control bodies with a regular statutory involvement in the programme, EU Member States that maintain a close co-operation with the specific beneficiary authorities in domains related to this programme.

The Grant beneficiary(s) will assist it by fulfilling a technical secretariat function together with the technical and operational counterparts directly involved in the programme's implementation.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action. The EU Delegation will have the role of “Observer” in Evaluation Committees for procurement contracts and financial support to third parties that are necessary for the achievement of the program objectives.

4.7. Pre-conditions

The signature of the implementation contracts under this Action will be conditional on the following actions, to be accomplished within 1 year of the signature of the Financing Agreement:

- For Outcome 1:
  
  Extension by the Government of the National Anti-Corruption Strategy beyond 2025.

- For Outcome 2:
  
  Receipt of a letter by the Government confirming that the selected public administration is willing and committed to implement the deliverables of the action.
5. PERFORMANCE MEASUREMENT

5.1. Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner’s responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its Outputs and contribution to the achievement of its Outcomes, and if possible at the time of reporting, contribution to the achievement of its Impacts, as measured by corresponding indicators, using as reference the logframe matrix (for project modality).

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

Arrangements for monitoring and reporting, including roles and responsibilities for data collection, analysis and monitoring:

Monitoring and reporting shall assess how the action is considering the principle of gender equality, human rights-based approach, and rights of persons with disabilities including inclusion and diversity. Indicators shall be disaggregated by sex and by disability.

5.2. Evaluation

Having regard to the importance of the action, a mid-term evaluation will be carried out for this action via independent consultants.

It will be carried out for problem solving, learning purposes, in particular with respect to facilitating the accessibility and efficiency of the public services to be delivered to citizens.

The Commission shall form a Reference Group (RG) composed by representatives from the main stakeholders at both EU and national (representatives from the government, from civil society organisations (private sector, NGOs, etc.), etc.) levels. If deemed necessary, other donors will be invited to join. The Commission shall inform the implementing partner at least 30 days in advance of the dates envisaged for the evaluation exercise and missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports shall be shared with the partner country and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

Evaluation services may be contracted under a framework contract.
Evaluations shall assess to what extent the action is taking into account the human rights-based approach, conflict sensitivity, as well as how it contributes to gender equality and women’s empowerment and disability inclusion. Expertise on human rights, disability and gender equality will be ensured in the evaluation teams.

5.3. Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

6. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

All entities implementing EU-funded external actions have the contractual obligation to inform the relevant audiences of the Union’s support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. To that end they must comply with the instructions given in the 2022 guidance document *Communicating and raising EU visibility: Guidance for external actions* (or any successor document).

This obligation will apply equally, regardless of whether the actions concerned are implemented by the Commission, the partner country, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU Member States. In each case, a reference to the relevant contractual obligations must be included in the respective financing agreement, procurement and grant contracts, and contribution agreements.

For the purpose of enhancing the visibility of the EU and its contribution to this action, the Commission may sign or enter into joint declarations or statements, as part of its prerogative of budget implementation and to safeguard the financial interests of the Union. Visibility and communication measures should also promote transparency and accountability on the use of funds. Effectiveness of communication activities on awareness about the action and its objectives as well as on EU funding of the action should be measured.

Implementing partners shall keep the Commission and the EU Delegation fully informed of the planning and implementation of specific visibility and communication activities before the implementation. Implementing partners will ensure adequate visibility of EU financing and will report on visibility and communication actions as well as the results of the overall action to the relevant monitoring committees.
Appendix 1: IDENTIFICATION OF THE PRIMARY INTERVENTION LEVEL FOR REPORTING IN OPSYS

A Primary intervention (project/programme) is a coherent set of results structured in a logical framework aiming at delivering development change or progress. Identifying the level of the primary intervention will allow for:

✓ Differentiating these Actions or Contracts from those that do not produce direct reportable development results, defined as support entities (i.e. audits, evaluations);
✓ Articulating Actions and/or Contracts according to an expected common chain of results and therefore allowing them to ensure a more efficient and aggregated monitoring and reporting of performance;
✓ Having a complete and exhaustive mapping of all results-bearing Actions and Contracts.

The present Action identifies as:

<table>
<thead>
<tr>
<th>Contract level (i.e. Grants, Contribution Agreements, any case in which foreseen individual legal commitments identified in the budget will have different log frames, even if part of the same Action Document)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ PC-41231</td>
</tr>
<tr>
<td>☒ PC-36411</td>
</tr>
</tbody>
</table>