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ANNEX II

of the Commission Implementing Decision on the Annual Action Plan in Favour of Lebanon 2022

Action Document for “Supporting progress in key areas of public administration reform in Lebanon”

ANNUAL ACTION PLAN 2022

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

1. SYNOPSIS

1.1. Action Summary Table

1. Title OPSYS Basic Act	Supporting progress in key areas of public administration reform in Lebanon Annual action in favour of Lebanon 2022 OSPYS business reference NDICI-GEO-NEAR/2022/ACT-61203 ABAC Commitment level 1 number: JAD.1007568 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe).
2. Team Europe Initiative	No
3. Zone benefiting from the action	The action shall be carried out in Lebanon.
4. Programming document	Lebanon Multi annual Indicative Programme 2021-2027 ¹
5. Link with relevant MIP(s) objectives/expected results	To support progress in key areas of public administrative reforms
PRIORITY AREAS AND SECTOR INFORMATION	
6. Priority Area(s), sectors	MIP Priority Area 1: Enhancing good governance and supporting reforms DAC Code: 151: Government & Civil Society - General
7. Sustainable Development Goals (SDGs)	Main SDG: SDG 16: Peace and Justice, Strong Institutions Other significant SDGs (up to 9) and where appropriate, targets:

¹ C(2022)8363 final of 24/11/2022

	SDG 5: Gender Equality SDG 10: Reducing inequalities			
8 a) DAC code(s)	15150: Democratic participation and civil society (10%) 15110: Public Sector Policy and Administrative Management (50%) 15113: Anti-corruption Organisations and Institutions (40%)			
8 b) Main Delivery Channel	Multilateral Organisations - 40000			
9. Targets	<input type="checkbox"/> Migration <input type="checkbox"/> Climate <input type="checkbox"/> Social inclusion and Human Development <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input checked="" type="checkbox"/> Human Rights, Democracy and Governance			
10. Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Aid to environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women's and girl's empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	RIO Convention markers	Not targeted	Significant objective	Principal objective
	Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. Internal markers and Tags	Policy objectives	Not targeted	Significant objective	Principal objective
	Digitalisation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Tags			/
	digital connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	digital governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	digital entrepreneurship	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	digital skills/literacy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	digital services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tags			/	
digital connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
health	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
education and research	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Migration	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reduction of Inequalities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
COVID-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

BUDGET INFORMATION

12. Amounts concerned	Budget line(s) (article, item): 14.020110 Southern neighbourhood Total estimated cost: EUR 12 000 000.00 Total amount of EU budget contribution EUR 12 000 000.00
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MANAGEMENT AND IMPLEMENTATION

13. Implementation modalities (type of financing and management mode)	Project Modality Indirect management with the entity(ies) Agence Française de Développement (AFD) / Expertise France selected in accordance with the criteria set out in section 4.3.1
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1.2. Summary of the Action

Lebanon has been facing compounded challenges with its largest peace-time socio-economic and financial crisis, aggravated over time and intensified by the impact of the COVID-19 pandemic on key sectors of the economy, the consequences of the explosion of the Port of Beirut in 2020 and Russia's war of aggression against Ukraine in 2022. Owing to the lack of political consensus for pursuing and implementing effective reforms to enhance governance and accountability of public services and to generate State revenues and reduce expenditures, the multi-dimensional crisis continues to persist, although the 2022 parliamentary elections showed growing support for candidates representing civil society and demanding reform.

Public administrations in Lebanon are marked by low quality and accessibility of public services, suffering from weak decision-making processes, absence of clear vision, lack of transparency and accountability leading to increased corruption and weakening the public service delivery. The sectarian regime, nepotism and confessional power sharing running across all government ministries and institutions creates inefficiencies in the public administrations, room for corruption and misuse of public funds. This results in

citizens and businesses wasting time and resources undermining the image of public services, distracting officials from achieving good results and advancing on public administrative reform. With the crisis, salaries of civil servants have plummeted resulting in an increasing number of highly qualified Lebanese migrating in search of better opportunities.

Following the explosion of the Port of Beirut in 2020, the European Union launched, jointly with the United Nations and the World Bank, the “Reform, Recovery and Reconstruction Framework (3RF)”. The 3RF addresses the impact of the explosion on affected communities and businesses in the Beirut, in addition it focusses on critical reforms, including enhancing transparency, accountability and integrity of the public administration. These reforms are notably to be achieved through the implementation of the National Anti-Corruption Strategy 2020-2025 (NACS), of which the recent nomination of the members of the National Anti-corruption Commission is crucial to the monitoring of the implementation of reform. Also, the adoption of the new Public Procurement Law in 2021 was an important milestone in the public administration reform agenda.

Accordingly, this action aims to support progress in key areas of public administration reform in Lebanon through enhancing the integrity, transparency and accountability of its public administration aligned with the opportunities of reform identified by the recent IMF Staff-Level Agreement and the principles of a modern public administration:

1. Safeguarding integrity of the public administration, mainly in the area of public human resources management (i.e. civil service reform);
2. Enhancing transparency in public administration systems, mainly in the area of public procurement at central and local level (i.e. public financial management reform) and access to public information (i.e. accountability);
3. Strengthening accountability of the administration by reinforcing the role of the main oversight bodies (i.e., Central Inspection Board, Court of Audits and National Anti-corruption Commission) in implementing reform and fighting and preventing corruption.

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” and with the 2017 European Parliament Resolution “on corruption and human rights in third countries”. It is also aligned with the Joint Communication on a Renewed Partnership with the southern Neighbourhood – A new Agenda for the Mediterranean², 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”.

2. RATIONALE

2.1. Context

Lebanon has been facing compounded challenges with its largest peace-time socio-economic and financial crisis, aggravated over time and intensified by the impact of the COVID-19 pandemic on key sectors of the economy and the consequences of the explosion of the Port of Beirut in 2020. According to the World Bank, the financial crisis that Lebanon is going through is “one of the top ten, possibly top three most severe economic collapses worldwide since the 1850s”. In 2020, the COVID-19 pandemic took its toll on the economic activity, especially on small businesses and the informal sector. Lebanon defaulted on its public debt, cutting its 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

² https://ec.europa.eu/commission/presscorner/detail/en/ip_21_426

banking sector severely restricted access to people's savings and limited cash withdrawals. Subsidies (food, gasoline, medications) were lifted abruptly. In 2022, the country might be facing a "bread crisis" as 80% of its wheat imports originate from Ukraine. A triple digit annual inflation rate was reported for the 18th consecutive month in December 2021, with annual inflation reaching a record 224%, compared to December 2020. Food and non-alcoholic beverages witnessed a staggering annual increase of 438%, compared to December 2020. Lebanon's economy contracted by 10.5% in 2021, the highest contraction amongst 193 countries globally. This devastating contraction follows from a 21.4% contraction in 2020, reflecting the near complete destruction of an economy and a shrinking GDP to 21.8 billion USD. Lebanon's inflation rate for 2021 is the third highest globally after Venezuela and Sudan.

Poverty rate amongst Lebanese would have reached 81% in 2021 and the extreme poverty rate 34%. More alarming is that food insecurity is today a reality in Lebanon. In October 2021, 53% of families reported skipping a meal compared with 37% only six months beforehand. Seven in ten families had to buy food on credit or borrow money to afford food; the situation is even more alarming for Syrian refugees with nine out of ten families having recourse to this coping mechanism. The crisis has resulted as well in a massive impoverishment of the middle classes, with the bulk of the labour force - paid in Lebanese lira – including civil servants - suffering from plummeting purchasing power. Thousands of highly qualified Lebanese (especially medical practitioners, university professors and scientists), entrepreneurs and young graduates, are migrating in search of better opportunities. The living conditions of the population have deteriorated dramatically, in part due to a lack of resources and a robust social protection systems. Importantly, the impact of the lockdowns in response to COVID-19 pandemic as well as the existing socio-economic crises disproportionately affected women.

Lebanon's leadership policy responses to these challenges have been highly inadequate, which is not so much related to knowledge gaps and quality advice, but rather the result of a dysfunctional governance system based on vested interests hampering the achievement of political consensus over effective policy initiatives. Prior to the Parliamentary elections in May 2022, the International Monetary Fund (IMF) reached Staff-Level Agreement on economic policies with the Lebanese authorities that aims to "bring back confidence and put the economy back on a sustainable growth path, with stronger private sector activity and job creation". The 2022 parliamentary elections showed growing support for candidates representing civil society and demanding reforms, which increases the potential to implement the five key pillars of reform outlined in the IMF Staff-Level Agreement, namely 1) restructuring the financial sector, 2) implementing fiscal reforms, 3) reforming state-owned enterprises, 3) strengthening governance, anti-corruption and anti-money laundering / combating the financing of terrorism and 5) establishing a credible and transparent monetary and exchange rate system. Under the Governance pillar, the agreement foresees the reform of the civil service, the modernisation of public financial management, the implementation of the Public Procurement Law and the reinforcement of oversight bodies, in particular the Anti-Corruption Commission. This action will pave the way to an IMF programme for which decisive policies and public administration reform action need to be undertaken by the government.

In response to these multidimensional crises, including in particular the explosion of the Port of Beirut in August 2020, the European Union (EU), jointly with the United Nations (UN) and World Bank (WB) developed, in close cooperation with the Government of Lebanon, Lebanese civil society and the international community, the "Reform, Recovery and Reconstruction Framework (3RF)"³. Launched in December 2020, the 3RF focuses on the impact of the explosion on affected communities and businesses in the Beirut area by distinguishing two priorities, i.e. track 1 - Supporting the most vulnerable individuals, communities and businesses affected by the explosion; and track 2 - Reconstructing critical assets and services. The inclusion of critical reform priorities under the second track recognises that reconstruction will not be feasible nor sustainable without reform, while covering the needs and interests of both women and men equally. Amongst the dozen of critical reforms identified in the 3RF, four relate to enhancing transparency and accountability integrity of the public administration where progress has been made over the last years in public administrative

³ <https://www.worldbank.org/en/country/lebanon/publication/lebanon-reform-recovery-reconstruction-framework-3rf>

reform, i.e. implementing the anti-corruption strategy, strengthening oversight roles and capacity of the Central Inspection and Court of Accounts, and adopting the new Public Procurement Law and implement regulations and secondary legislation.

The 3RF institutional arrangements bring together the Government of Lebanon, international partners, civil society and private sector organisations in the implementation and monitoring of the 3RF. A solid inter-ministerial coordination mechanism was put in place next to sector working groups joining forces to report on the progress made to the consultative group. The EU is co-chairing the Consultative Group, which acts as strategic sounding board of the 3RF. An independent oversight board composed of Lebanese civil society organisations monitors' progress, provides periodic reports disclosed to the public and the Consultative Group, receives complaints and feedback from beneficiaries and citizens and report on its findings. Coordination between state institutions is further strengthened through the Central Management Unit (CMU) set up by the Prime Minister. This latter recently confirmed his intention to enhance the role of the CMU by including civil society organisations and other stakeholders.

Public administrative reforms are mainly to be achieved through the implementation of the National Anti-Corruption Strategy 2020-2025 adopted in 2020, which 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 implementation of specialised reform laws since 2018 are steps in the right direction⁴, as well as is the adoption of the new Public Procurement Law in 2021 which was praised by the international community. Its drafting was coordinated by the Institute of Finance and supported by EU-Sigma, AFD-Expertise France and the World Bank, which are now aligning their interventions to support its implementation. As also requested in the 3RF, the Government of Lebanon proceeded with the nomination of the board members of the National Anti-Corruption Commission.

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" and with the 2017 European Parliament Resolution "on corruption and human rights in third countries". It is also aligned with the Joint Communication Renewed Partnership with the southern Neighbourhood – A new Agenda for the Mediterranean⁵, 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 longstanding experience in Lebanon with administrative reform and in the areas addressed through this action. The 3RF institutional arrangements ensure close coordination between the main actors involved in this reform, which are some of the EU Member States, the World Bank and the United Nations.

2.2. Problem Analysis

Short problem analysis

Lebanon is experiencing a volatile and complex operating environment for governance. The accountability system is highly ineffective. The oversight of the public administration is almost absent. The judicial system, under the patronage of political parties is not independent. In this light, the implementation of the "Reform,

⁴ Other relevant laws include (a) Access to Information Law adopted in 2017; (b) Law on e-Transactions and Personal Data adopted in 2018; (3) Whistle-Blower Protection Law adopted in 2018, and (4) Law on Enhancing Transparency in the Petroleum Sector adopted in 2018.

⁵https://ec.europa.eu/commission/presscorner/detail/en/ip_21_426

Recovery and Reconstruction Framework - 3RF”, which comprises urgent reforms to reinforce governance, is an opportunity for the Lebanese civil society to lobby the executive and legislative powers to adopt measures to fight against corruption and engage in a profound reform of the public administration. The approval of the “National Anti-Corruption Strategy 2020-2025 – NACS” in 2020, the adoption of a new Public Procurement Law in 2021 and the establishment of the National Anti-Corruption Commission in 2022 are important steps in this reform process. In order to maintain this momentum, it is essential to continue supporting national efforts in strengthening the institutions that play a major role in enhancing transparency and accountability.

Public administrations in Lebanon are marked by low quality and accessibility of public services. They suffer from weak decision-making processes; absence of clear vision about their role, lack of transparency and accountability leading to increased corruption and thus weakening the public service delivery. The sectarian regime, nepotism and confessional power sharing running across all government ministries and institutions creates inefficiencies in the public administrations, room for corruption and misuse of public funds. In 2021, Lebanon was ranked 154 out of 180 countries on Transparency International’s Corruption Perceptions Index.

The working environment for public servants is unproductive due to the absence of modern human resources management systems. Low salaries; uneven and unfair distribution of wages due to different contractual arrangements; absence of linking promotions and salaries to the public servant actual performance; the non-transparent recruitment processes for filling vacant positions have created a demotivating environment for public servants and rendered the quality and accessibility of public services challenging. With the economic crisis, salaries of civil servants have plummeted leading to a widespread loss of human capital and the impossibility for ministers to recruit senior advisors.

The public procurement system is old and prone to corruption. The Government is the biggest buyer. Public procurement accounts for an average of 20% of central government expenditure and 6.5% of GDP. Modernising the public procurement is crucial in the fight against corruption in order to help saving public funds and using them in an efficient and effective manner. The implementation of the new Public Procurement Law will require between EUR 5 and 6 million for 2022-2024. Key actions during this period aim to strengthen the required implementation system in national and local administrations; create the regulatory bodies; strengthen the capacity of public procurement officers, and enhance the role of Civil Society Organisations in monitoring public procurement transactions

Oversight bodies, in particular the Civil Service Board, the Central Inspection Board and the Court of Audits have an important role to play in instilling a culture of accountability and in fighting and preventing corruption in the public administration. However, they barely fulfil their mandate due to a lack of human and financial resources and modern means to enable them to perform their duties. Their mandates often overlap and are outdated, leading to unclear responsibilities and coordination bottlenecks.

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

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. Recently new inspectors have been recruited and the first e-governance platform in Lebanon, IMPACT. IMPACT, which stands for the Inter-Ministerial and Municipal Platform for Assessment, Coordination and Tracking, gives access to open data related to different areas (such as administrative, financial, engineering, education, health, agriculture, environment, vaccines and COVID-19) to the relevant actors. Data is generated nation-wide, at different levels of the public sector, including ministries and municipalities. Access to open data facilitates monitoring and control by the CIB and citizens, enhancing transparency and accountability of the relevant institutions. The platform is an example of the CIB’s commitment to citizens’ right to access information. The CIB has been and is currently supported by the EU funded programme ACT, which is implemented by Expertise France.

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 ACT, which is implemented by Expertise France.

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 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 Institute des Finances Basil Fuleihan is a knowledge centre contributing to capacity development in public financial management and governance through conducting policy research, delivering training and developing partnerships. Under the umbrella of the Ministry of Finance, it operates as a specialised autonomous public institution. The Institute led the drafting of the new Public Procurement Law and of the National Public Procurement Plan. The Institute is designated as the National Coordinator for Public Reform. It is supported by EU-SIGMA.

The Central Tender Board (CTB) is the main public procurement agency. It is a department under the authority of the Central Inspection. The Council of Ministers can easily overrule its comments and feedback on tenders that are non-binding. In addition it is undermined by the existence of different procurement systems in other public institutions. The new Public Procurement law foresees the transformation of the CTB into an independent regulatory authority, the Public Procurement Authority. Support has been previously provided to the Tender board through the technical assistance facility and mainly in reviewing public tenders.

Civil Society Organisations: Lebanon has a vibrant, diverse and active civil society, representing a wide range of voices in reform and development debates, advocating for the rights of vulnerable and marginalised populations, but also taking responsibility for the delivery of services. They represent Lebanese citizens calling for better services delivery, reform, political accountability and transparency. New CSOs, together with citizens' groups have been involved in the 2019 protests and were the first responders to the explosion of the Port of Beirut.

2.3. Lessons Learned

The programme builds on the achievements of several EU programmes implemented in the last decade. In the area of institution-building, the action builds on the results of the Technical Assistance Facility (TAF), which has provided demand-driven technical, legal and training assistance in support of public administration reform to more than 20 government institutions to enhance accountability and transparency to citizens through strengthened administrative systems.

In the area of anti-corruption, this action will complement and reinforce the achievements made through the programmes “Anti-corruption Trust in Lebanon” implemented by UNDP until 2024 and co-financed by Denmark; and “Promoting Transparency and Combatting Corruption at National Level” implemented by Expertise France until 2023. It will complement the current work done through the Lebanon Financing Facility of the “Reform, Recovery and Reconstruction Framework - 3RF”, which is focusing on developing a responsive citizen engagement mechanism to advance transparency and accountability.

A number of weaknesses have been observed in previous interventions, namely: i) lack of ownership and sustainability of funds; ii) inadequate inter-institutional co-ordination and co-operation among government institutions, iii) limited coordination among donors, which created a duplication rather than complementarity of actions, and iv) absence of adequate follow-up, reporting and monitoring mechanism of strategies. Moreover, the evaluation report of a previous EU funded project Policy Planning and Governance underlined the need for donor coordination in order to avoid implementing the similar interventions, as well as to collectively advocate for the implementation of serious reforms by the Lebanese Government. Moreover, support should be channelled to institutions or bodies mandated and having the authority to execute the reform process. In addition, the participatory comprehensive approach should be used, including all relevant government institutions involved in applying and implementing reforms. Furthermore, a general conclusion derived from previous governance projects is the slow pace of reforms and implementation by Parliament and Government. Actually, in the case of anti-corruption, what hinders progress is not the adoption of strategies and the legislative framework, but rather their effective implementation.

To this effect, this action will primarily focus on supporting the implementation of already existing legislation and national policies/strategies in the area of governance and accountability. Moreover, the proposed action has been designed based on reflections and lessons learned and will be channelled to institutions or bodies mandated and having the authority to execute the reform process. In addition, it will seek synergies with the existing EU programmes, in close coordination with the relevant EU Member States. In particular, the 3RF Donor Working Group on Anti-Corruption led by the EU and World Bank will be used to closely coordinate with government, donors and civil society representatives. Finally, it is important to recognise that actions alone are insufficient without the required enabling political environment. Reinforced policy dialogue with civil society and like-minded Parliament Members will be important; as well as outreach to citizens.

3. DESCRIPTION OF THE ACTION

3.1. Objectives and Expected Outputs

The Overall Objective (Impact) of this action is to support progress in key areas of public administration reform in Lebanon through enhancing the integrity, transparency and accountability of its public administration aligned with the opportunities of reform identified by the recent IMF Staff-Level Agreement and the principles of a modern public administration.

The Specific(s) Objective(s) (Outcomes) of this action are to:

- 1 Safeguard integrity of the public administration, mainly in the area of public human resources management (i.e. civil service reform)
- 2 Enhance transparency in public administration systems, mainly in the area of public procurement (i.e. public financial management reform) at central and local level and access to public information (i.e. accountability)
- 3 Strengthen accountability of the administration by reinforcing the role of oversight bodies in implementing reform and fighting and preventing corruption

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

Contributing to Outcome 1 (or Specific Objective 1)

- 1.1 Roles and responsibilities of public officials, including updated organigrams and mandates of administrations in pilot institutions, clearly defined
- 1.2 Standards of transparency and merit applied in appointment, promotion and recruitment of public officials
- 1.3 Independence and effectiveness of the Civil Service Board enhanced

Contributing to Outcome 2 (or Specific Objective 2)

- 2.1 Centralised and decentralised public procurement systems more transparent by setting up the e-procurement platform
- 2.2 Skills of procurement officers enhanced and information is readily accessible to the public
- 2.3 The role of civil society organisations in supervising and monitoring public procurement transactions made by the Public Procurement Authority enhanced

Contributing to Outcome 3 (or Specific Objective 3)

- 3.1 The Central Inspection Board (CIB) modernised and its capacity to fight and prevent corruption enhanced
- 3.2 The Court of Audit (CoA) modernised and its capacity to fight and prevent corruption enhanced
- 3.3 The National Anti-Corruption Commission (NACC) established and its capacity to detect and prevent corruption enhanced
- 3.4 Coordination and cooperation between oversight bodies enhanced

3.2. Indicative Activities

Activities related to Output 1.1:

- Organising workshops and roundtables with different administrations and the Civil Service Board in order to define the scope of mandate of pilot administrations
- Provide technical assistance to pilot administrations in order to develop job descriptions and organigrammes

Activities related to Output 1.2:

- Reviewing the legal texts related to public service
- Developing appropriate tools and procedures to be applied in recruitment as in appraisal and promotions
- Designing and delivering capacity building to improve the skills and competencies of public servants involved in human resources management

Activities related to Output 1.3:

- Organising workshops and roundtables with different units of the Civil Service Board around ways to reinforce their roles
- Developing appropriate tools and procedures to reinforce the role of Civil Service Board in human resources management and in work procedures

- Designing and delivering capacity building to improve the skills and competencies of public servants involved in detecting and investigating corruption and fraud

Activities related to Output 2.1:

- Designing, developing or upgrading the e-procurement platform also supporting the implementation of green public procurement
- Providing the needed resources to run and operate the platform
- Reinforcing and strengthening the role of the Public Procurement Mandated Authority (the actual tender board) in performing its mandate and managing the platform by providing technical assistance and tools
- Capacity building and roll out among pilot contracting entities

Activities related to Output 2.2:

- Supporting the national coordinator in conducting the needed trainings and capacity building activities as well as in coordinating the public procurement reform
- Developing a National program to train the trainers
- Creation of e-learning platform
- Conducting trainings and delivering hands –on and virtual trainings to CSOs and private sectors.

Activities related to Output 2.3:

- Organising workshops and roundtables with different CSOs and with the Public Procurement Mandated authority
- Developing appropriate tools and procedures to reinforce the role of CSOs in monitoring transactions
- Designing and delivering capacity building to improve the skills of CSOs and PPA to monitor transactions

Activities related to Output 3.1, 3.2 and 3.3:

- Organising workshops and roundtables with different oversight bodies (i.e. CIB, CoA, NACC) around ways to reinforce their roles
- Developing appropriate tools and procedures to reinforce the role of oversight bodies mainly in detection of corruption and fraud
- Designing and delivering capacity building to improve the skills and competencies of public servants involved in detecting and investigating corruption and fraud

Activities related to Output 3.4.:

- Organising workshops and roundtables to promote coordination and cooperation among the different oversight bodies (i.e. CIB, CoA, NACC)
- Establishing a coordination mechanism between the different oversight bodies

3.3. Mainstreaming

Environmental Protection, Climate Change and Biodiversity

Outcomes of the Environmental Impact Assessment (EIA) screening (relevant for projects and/or specific interventions within a project: The EIA screening classified the action as Category C (no need for further assessment)).

Outcome of the Climate Risk Assessment (CRA) screening (relevant for projects and/or specific interventions within a project): 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 gender equality and empowerment of women will be addressed among the specific objectives and will be mainstreamed in the Action. The Action will promote meaningful and active participation of women in planning and decision making namely in the implementation of the 3RF agenda to ensure an inclusive recovery process. It will cover the needs, interests, and priorities of both women and men to support gender sensitive policies and engagement of women in the governance process.

National data and statistics reveal clear and wide qualitative gender gaps across the Lebanese public administration. In the public sector, while women make up 45% of all public administration positions, they account for only 21% of grade 1 positions⁶. Several studies highlighted the legal barriers and the challenging gender norms that prohibit women's advancement in public spheres. Even though there has been some progress as a result of civil society organisations campaigns over the years, women's equal participation across different sectors and mainly in public administration has yet to be achieved.

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. Consultations with civil society actors were organised and their recommendations are duly reflected in the design of the action.

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 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 and increase their participation in decision-making at local and national level mainly under the 3RF reform process. Through this Action, the EU promotes legally binding international standards to promote the respect of democracy, fundamental rights and the rule of law. Working under a participatory approach with public sectors, civil society and citizens on implementing the 3RF agenda in terms of promoting their participation in the governance and the decision making process, with special focus on women's role and engagement, will reinforce the democratic participation of the population residing in the Lebanon.

Conflict sensitivity, peace and resilience

This action addresses the priorities and recommendations identified in the recent EU conflict analysis, which has been prepared in line with Art. 12 of the regulation (EU) 2021/947 establishing NDICI.

Disaster Risk Reduction

Not applicable

⁶ As part of a workshop held by the Lebanese League for Women in Business in 2019, the Head of the Civil Service Council, Nisrine Machmouchi, published these numbers.

3.4. Risks and Assumptions

Category	Risks	Likelihood (High/Medium/Low)	Impact (High/Medium/Low)	Mitigating measures
1- External Environment	Political stalemate and social tensions resulting in an overall deterioration of the situation, including security	Medium	Medium	Project execution will be contingent upon the possibility to operate under the prevailing conditions.
1- External Environment	Lack of political commitment to undertake reforms under the 3RF process, and lack of ownership to achieve results	Medium /low	Medium/ low	3RF institutional arrangements with government participation, and the establishment of a Central Management Unit (CMU) to coordinate with the Consultative Group (CG) provides a solid forum for advocacy and cooperation. Selected public institutions need to demonstrate sustained commitment for reform and project implementation.
2- Planning, processes and systems	EU assistance lack of responsiveness to emerging needs of beneficiaries and lack of coordination with other donors	Low	Low	EU Delegation is in close coordination with different stakeholders in order to align and adapt activities based on actual needs within the main objective of the programme.
	The resources already allocated to the tender board cannot cover the proper functioning of the Public Procurement Authority	Medium	Medium	The Public Procurement mandated will continue to be supported by different donors and political dialogue with Civil Service board will be even more enhanced through the project to facilitate the transfer of Civil Servants to the Public Procurement Authority.
3- People and the Organisation	Lack of motivation and commitment of Civil Servant	Medium	Medium	Motivation through enhancing skills and techniques and applying modern promotion and appraisal systems.

External Assumptions

The Lebanese Government will continue to show its commitment to implement the National Anti-Corruption Strategy, the National Public Procurement Strategy as well as reforms in the broader context of the 3RF. Stakeholders will continue to show interest in implementing the action and adopting all related deliverables.

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”, the 3RF priorities and the leverage provided through its institutional arrangements and the IMF Staff-level agreement and the potential leverage provided by the conclusion of an IMF programme, a more transparent, accountable and efficient public administration could emerge in Lebanon.

If as general assumption, the Lebanese government will continue to demonstrate its commitment to implement the National Anti-corruption Strategy, the National Public Procurement Strategy and develop the legal and policy framework required for civil service reform, then progress in the public administration reform will be implemented, the accountability, transparency and efficiency of the Lebanese administration will increase, corruptive practices will decrease and thus the trust of citizens will be recovered.

If the Government and the Civil Service Board remain committed to modernise the public human resources management, then the roles of public servants will be well defined, recruitment and recruitment systems will be more transparent, a more productive environment will be in place, and thus the quality and accessibility of public service will be enhanced.

If the government appoints the members of Public Procurement Authority, and if it is well established and equipped with all the needed tools to perform its mandate then the accountability of the procurement operations will be enhanced, fair completion will be established and national and international investments will be encouraged.

If all involved public servants demonstrate their commitment and willingness to adapt and accept the new and modernised procedures and public procurement law, then the capacity of the administration to manage public procurement operations in a transparent and efficient way will be increased and the misuse of public fund will be reduced and controlled.

If all political actors at central and local level remain committed to the reform process agreed through the signature of the IMF Staff-level Agreement, then the role of oversight bodies in monitoring the implementation of reform and fighting and preventing corruption will be further strengthened through this action and thus accountability will be further enhanced.

If all stakeholders remain willing to implement public administration reform measures at central and local administration level, then the capacities of public administrations in implementing regulatory mechanism will be enhanced, the policy making process will be more efficient, accessibility to information will be reinforced, as well as the accessibility and quality of public services.

3.6. Indicative Logical Framework Matrix

Results	Results chain: Main expected results [maximum 10]	Indicators [at least one indicator per expected result]	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	To support progress in key areas of public administration reform through enhancing the integrity, transparency and accountability of its public administration	1- The Worldwide Governance Indicators (WGI) Government effectiveness	1- 11.54/100	n/a	World Bank reports	<i>Not applicable</i>
		The Worldwide Governance Indicators (WGI)- Control of corruption	2- 12.02 /100	n/aContract level	World Bank reports http://info.worldbank.org/governance/wgi/Home/Reports	
		3- Corruption Perception Index	24	n/aduring inception phase Contract level	Transparency International reports	
Outcome 1	Integrity of the public administration, mainly in the area of public human resources management (civil service reform), safeguarded	1.1 Status of Roles and responsibilities for public officials drafted in pilot administrations using a gender lens	1.1 0	1.1 Decree and or ordinance adopted	Number of job descriptions approved and implemented the public administrations	Commitment of the government to implement reforms in line with the 3RFs and the National Anti-corruption Strategy
		1.2 Status of the Transparent promotion system	1.2 Not established	1.2 Decree and or ordinance adopted	Reports of implementing partners	
		1.3 Status of the Transparent and gender sensitive recruitment system	1.3 Not established	1.3 Decree and or ordinance adopted	Reports of implementing partners	

Results	Results chain: Main expected results [maximum 10]	Indicators [at least one indicator per expected result]	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Outcome 2	Transparency in public administration systems, mainly in the area of public procurement at central and local level and access to public information, enhanced	2.1 Number of pilot administration using the e-procurement platform	2.1 0	2.1 tbd at the drafting stage of the description of the action (DoA)	Reports produced from the platform	Commitment of the government to implement reforms in line with the 3RFs and the National Anti-corruption Strategy
		2.2 Number of procurement transactions launched through the platform	2.2 0	2.2 tbd at the DoA	Implementing partner reports	
		2.3 Number of follow up of complaint cases	2.3 0	2.3 tbd at the DoA	2.3 CSOs monitoring reports	
Outcome 3	Accountability of the administration by reinforcing the role of oversight bodies in fighting and preventing corruption strengthened	3.1 Number of Monitoring and Audit and inspection reports regularly produced	3.1 0	3.1 tbd at the DoA	Reports produced by government CSOs monitoring reports	Commitment of the government to implement reforms in line with the 3RFs and the National Anti-corruption Strategy
		3.2 Number of cases treated jointly by oversight bodies	3.2 0	3.2 tbd at the DoA	Cases referred to justice	

Results	Results chain: Main expected results [maximum 10]	Indicators [at least one indicator per expected result]	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Output 1 related to Outcome 1	1.1 Roles and responsibilities of public officials, including updated organigrams and mandates of administrations in pilot institutions, clearly defined	1.1.1 Status of the Guide for public officials job descriptions	1.1.1 absent	1.1.1 Decree and or ordinance adopted	Number of deliverables submitted and printed	Public Servants and administrations committed to work with the implementing partners Environment conducive to implement reform
		1.1.2 Number of organigram and related decrees drafted	1.1.2 0	1.1.1 tbd at the DoA	Implementing partner reports	
Output 2 related to Outcome 1	1.2 Standards of transparency and merit applied in appointment, promotion and recruitment of public officials	1.2.1. Status of Standards for transparency in merit	1.2.1 Not deployed	1.2.1 Deployed	Number of deliverables submitted and printed	
		1.2.2 Number of recruitment procedures implemented following the new system	1.2.2 0	1.2.2 tbd at the DoA	Implementing partner reports	
Output 3 related to Outcome1	1.3 Independence and Effectiveness of the Civil Service Board enhanced	1.3.1 Number of New modernised techniques developed for CSB	1.3.1 tbd at the DoA	1.3.1 tbd at the DoA	Number of deliverables submitted and printed	
		1.3.2 Status of the digitalised Archiving system digitalised	1.3.2 tbd at the DoA	1.3.2 tbd at the DoA	Implementing partner reports	
		1.3.3 Status of the Follow up mechanism	1.3.3 tbd at the DoA	1.3.3 tbd at the DoA		

Results	Results chain: Main expected results [maximum 10]	Indicators [at least one indicator per expected result]	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Output 1 related to Outcome 2	2.1 Centralised and decentralised public procurement systems more transparent by setting up the e-procurement platform	2.1.1 Status of the E-procurement platform	2.1.1 Not deployed	2.1.1 Deployed		
		2.1.2 Number of entities trained and certified to conduct public procurement using the e-platform	2.1.2 0	2.1.2 tbd at the DoA		
Output 2 related to Outcome 2	2.2 Skills of procurement officers enhanced and information readily accessible to the public	2.2.1 Number of entities trained and certified to conduct public procurement according to the new law – segregated by sex at least 30% of women in selected entities are trained	2.2.1 0	2.2.1 tbd at the DoA	Certifications issued Implementin g partner reports Reports issued by public administratio ns	
		2.2.2 Number of certified trainers segregated by sex at least 30% of women in relevant administrations are trained	2.2.2 0	2.2.2 tbd at the DoA		
Output 3 related to Outcome 2	2.3 The role of civil society organisations in supervising and monitoring public procurement transactions made by the Public Procurement Authority enhanced	2.3.1 Status of the Model for citizen engagement between CSOs and PPA	2.3.1 Not deployed	2.3.1 Deployed	CSOs reports PPA reports	
		2.3.2 Number of transactions reviewed by the PPA	2.3.2 0	2.3.2 tbd at the DoA		

Results	Results chain: Main expected results [maximum 10]	Indicators [at least one indicator per expected result]	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Output 1 related to Outcome 3	3.1 Central Inspection Board (CIB) modernised and its capacity to fight and prevent corruption enhanced	3.1.1 Number of modernised techniques developed and approved	3.1.1 tbd at the DoA	3.1.1 tbd at the DoA	CIB reports CSOs reports Implementing partner reports	
		3.1.2 Number of Inspection missions conducted following the new procedures	3.1.2 tbd at the DoA	3.1.2 tbd at the DoA		
		3.1.3 Number of staff trained on new techniques to prevent and fight corruption segregated by sex	3.1.3 0	3.1.3 tbd at the DoA		
Output 2 related to Outcome 3	3.2 Court of Audit (CoA) modernised and its capacity to fight and prevent corruption enhanced	3.2.1 Number of modernised techniques developed and approved	3.2.1 tbd at the DoA	3.2.1 tbd at the DoA	CoA reports CSOs reports Implementing partner reports	
		3.2.2 Number of auditing missions conducted following the new procedures	3.2.2 tbd at the DoA	3.2.2 tbd at the DoA		
		3.2.3 Number of staff trained on new techniques to prevent and fight corruption segregated by sex	3.2.3 0	3.2.3 tbd at the DoA		
Output 3 related to Outcome 3	3.3 National Anti-Corruption Commission (NAC) established and its capacity to detect and prevent corruption	3.3.1 Number of tools used to implement the mandate of NAC	3.3.1 tbd at the DoA	3.3.1 tbd at the DoA	NAC reports CSOs reports Implementing partner reports	
		3.3.2 Number of staff trained techniques to prevent and fight corruption	3.3.2 0	3.3.2 tbd at the DoA		
Output 4 related to Outcome 3	3.4 Coordination and cooperation between oversight bodies enhanced, and their effectiveness institutionalised	3.4.1 Number of coordination meetings	3.4.1 0	3.4.1 tbd at the DoA	Implementing partner reports	
		3.4.2 Status of the Platform to share information	3.4.2. Not deployed	3.4.2. Deployed		

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with the Republic of Lebanon.

4.2. Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3.1 will be carried out and the corresponding contracts and agreements implemented, is **60 months** from the date of adoption by the Commission of this financing Decision.

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 measures⁷.

4.3.1. Indirect Management with a pillar-assessed entity⁸

This action may be implemented in indirect management with Agence Française de Développement (AFD) and Expertise France (member of AFD Group). This implementation entails the achievement of all 3 outcomes and related outputs through managing the activities identified in Section 3.

The envisaged entities (AFD and Expertise France) have been selected using the following criteria:

- Specific expertise: Global and regional expertise in the implementation of public administration reforms, strengthening public procurement systems and fighting corruption.
- Logistical and/or management capacities: longstanding experience in the implementation of technical cooperation programme in Lebanon and medium to large portfolio of projects / programmes.
- 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 implementation of reform measures and successful track record and demonstrated engagement in working with Lebanese public administrations on public procurement, anti-corruption tools and / or public administration reform.
- Strategic relevance for EU engagement: AFD has been and continue to be main actor in the area of public procurement in Lebanon, together with the EU and the World Bank. Through this action the EU will be in a better position to lead donor coordination and policy dialogue in these critical areas of reform.

If negotiations with the above-mentioned entity fail, that part of this action may be implemented in direct management in accordance with the implementation modalities identified in section 4.3.2.

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

If indirect management (as per section 4.3.1) with a pillar-assessed entity cannot be implemented due to exceptional and duly justified circumstances outside of the Commission's control, the alternative modality would be direct management through procurement.

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.

⁸ The signature of a contribution agreement with the chosen entity is subject to the completion of the necessary pillar assessment.

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

Indicative Budget components	EU contribution (amount in EUR)
Implementation modalities – cf. section 4.3	
Objective 1: Integrity of the public administration, mainly in the area of public human resources management safeguarded	
Objective 2: Transparency in public administration systems, mainly in the area of public procurement at central and local level and access to public information enhanced	
Objective 3: Accountability of the administration by reinforcing the role of oversight bodies in fighting and preventing corruption strengthened	
Indirect management with Member State agency cf. section 4.3	12 000 000
Evaluation – cf. section 5.2 Audit – cf. section 5.3	Will be covered by another Decision
Communication and visibility – cf. section 6	N/A
Contingencies	N/A
Total	12 000 000.00

4.6. Organisational Set-up and Responsibilities

The EU Delegation will take part in the steering committee to be formed at the start of the project which will include representatives from the various stakeholders engaged in the project namely civil society organisations, government representatives and other relevant groups. The EU Delegation will have the role of “Observer” in all Evaluation Committees to be formed under the Financial Support to Third Party in case the action proposed financial support to CSOs under objective 2 of the action.

In addition a technical committee meeting will be organised with all stakeholders involved in governance projects funded by the EU In addition the 3RF working group for the anticorruption pillar will have an active role in reviewing and monitoring the implementation of the action.

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.

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).

Roles and responsibilities for data collection, analysis and monitoring:

- Baseline and targets will be provided at the inception phase following a thorough situation analysis that identifies pressing and urgent needs under the 3 specific objectives of the programme.
- The implementing partner will ensure that all reports shall be laid out in such a way as to allow monitoring of the means envisaged according to the budget details for the action. The final report, narrative and financial, will cover the entire period of the Action implementation. All reports shall include Sex, Age, and Disability Disaggregated Data (SADDD).
- Results monitoring will be requested at midterm and will be based on the principles of simplicity, and promoting a learning culture to inform and, where necessary, adapt delivery.
- The EU Delegation will undertake regular project monitoring visits through its own staff for independent monitoring reviews at both operational and financial level (spot-check missions).

5.2. Evaluation

Having regard to the nature of the action, a mid-term evaluation will be carried out for this action or its components via independent consultants contracted by the Commission.

It will be carried out for problem solving, learning purposes, in particular with respect to impact on public servants as well as on the implementation and the use of deliverables.

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 one month 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 dissemination⁹. 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.

The financing of the evaluation shall be covered by another measure constituting a Financing Decision.

⁹ See best [practice of evaluation dissemination](#)

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 [Communication and Visibility Requirements of 2018](#) (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 delegation 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/Office 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.