



## United Nations Development Programme

### Country: Lebanon Initiation Plan

**Project Title:** Anti-Corruption for Trust in Lebanon (ACT Lebanon)

**Expected CP Outcome(s):** "Government's ability to improve the performance of institutions and promote participation and accountability increased"

*(Those that are linked to the project and extracted from the CPAP)*

**Initiation Plan Start Date:** 1 March 2019

**Initiation Plan End Date:** 29 February 2020

**Implementing Partner:** UNDP / 001981

#### Brief Description

The Project Initiation Plan aims to support key anti-corruption stakeholders in Lebanon to maintain the momentum for national dialogue and capacity development in preparation for the formal adoption and implementation of the country's first-ever national anti-corruption strategy that was announced in April 2018. The Project Initiation Plan will do so by focusing on the achievement of two outputs:

**Output 1** Key stakeholders enabled to advocate and monitor the adoption and implementation of anti-corruption legislative priorities

**Output 2** Participatory processes established in selected vulnerable sectors to assess related corruption risks and pilot corresponding mitigation measures

The PIP will directly contribute to the achievement of Lebanon's commitments under the Government plan and overall vision that was presented at the international CEDRE conference in Paris in April 2018, reinforcing its ability to implement the UNCAC and work towards achieving the Sustainable Development goals (SDGs), particularly SDG 16.

Programme Period: 2019

Atlas Award ID: 00118043

PAC Meeting Date: N/A

Gender Marker: Gen 2

Total resources required \$ 430,920

Total allocated resources: \$ 350,000

Net Resources: \$ 327,103

GMS (7%): \$ 22,897

UNDP Funding GIPS: \$ 350,000

Remaining to be mobilized \$ 80,920

Agreed by UNDP:

---

## I. PURPOSE

In Lebanon, there is broad consensus that corruption is a major challenge. This is reflected in the country's poor standing on related international indicators, including but not limited to the 2017 Corruption Perception Index (CPI) by Transparency International, where it scored 28/100 points, which is well below the global and regional averages, placing it 136th among 176 countries. The 2017-2018 edition of the "Global Competitiveness Index" identifies corruption to be the second "most problematic factor for doing business" out of sixteen factors; and is only preceded in this regard by the "government instability" factor.

While there are no official figures of the direct cost of corruption in Lebanon, recent estimates put it at five billion USD annually, which is more than 10.5 percent of GDP. The real cost, however, goes well beyond that, and is perhaps best seen in the country's poor public services (e.g. electricity, education, health, solid waste, etc.) and extremely high levels of inequality and massive debt, contrasted to extremely low levels of public trust in politicians, where Lebanon ranks 128<sup>th</sup> among 136 countries according to the most recent figures of the World Economic Forum.

Rooted in a confessional system that fosters clientelism and rent-seeking, corruption in Lebanon has become systemic, taking advantage of outdated legal and institutional instruments, overall societal complacency, and perhaps most importantly, political practices that thwart the principles of transparency, accountability and the rule of law, all of which are necessary for curbing corruption. Nonetheless, chronic inaction by the government and relatively limited support by the international community over the past decades seem to have allowed corruption to become further entrenched, at a high developmental cost for the country, taking its toll on the infrastructure, public services and peoples' sense of dignity and security.

Recent years, however, have seen renewed momentum for anti-corruption, driven by a new generation of civil society actors, bolder media coverage, and increased awareness in the political and economic spheres. Most notably, Lebanon developed its first national anti-corruption strategy and formally presented it in April 2018. The national anti-corruption strategy and implementation plan were developed through a participatory process that was led by the Ministerial Anti-Corruption Committee, headed by the Prime Minister, in conjunction with a supporting Technical Committee that is headed by the Minister of State for Administrative Reform. The two committees were established in 2011, with the assistance of UNDP, and have undertaken various tasks since then leading up to the strategy, including in relation to the implementation of the UN Convention against Corruption (UNCAC) to which Lebanon has become a State Party in 2009.

The Lebanese national anti-corruption strategy identifies seven outcome areas for action including on specialized legislation, human resource management, public procurement, the role of the judiciary, the role of oversight institutions, public engagement, and prevention at the sectoral level. The document, which has not yet been formally adopted by the Council of Ministers, is expected to be one of the priorities for the new government, once officially formed. This is in the context of the follow-up to the CEDRE Conference that also took place in April 2018, and in which the Government of Lebanon presented an ambitious investment plan aimed at jumpstarting growth, creating job opportunities, and renovating infrastructure. The overall vision presented by the Government of Lebanon included an important reform package, including dedicated "Governance, Accountability and Transparency Reforms" (within which the implementation of the national anti-corruption strategy is listed), as part of a broader compact between Lebanon and the international community.

**The Project Initiation Plan overall aim to support the key stakeholders to maintain the momentum for national dialogue and capacity development towards the formal adoption and implementation of the country's first-ever national anti-corruption strategy.** The Project Initiation Plan will do so by focusing on two critical aspects (legislative framework and sector-specific prevention) that are directly related to the achievement of Lebanon's commitments under the plan that was presented at the international CEDRE Conference; and which are ultimately key for its ability to implement the UNCAC and work towards achieving the Sustainable Development Goals (SDGs), particularly SDG 16 on "Peace, Justice and Strong Institutions".

---

## II. EXPECTED OUTPUTS

In line with the strategic priority of the UN Strategic Framework for Lebanon 2017-2020 “Government’s ability to improve the performance of institutions and promote participation and accountability increased” and UNDP’s Country Programme document 2017-2020 focused on “Government institutions core state functions and capacities strengthened for accountability and policy formulation and reform enhanced”, this “ACT Lebanon” initiative will focus on serving **two strategic objectives**: (i) promoting the national anti-corruption legislative agenda in line with the UNCAC as the basis for enhanced transparency and accountability in government; and (ii) building corruption risk management capacities in pilot sectors as the basis for integrating preventive risk-informed anti-corruption policies and practices across the government in line with national development priorities and related international commitments.

### **Output 1: Key stakeholders enabled to advocate and monitor the adoption and implementation of anti-corruption legislative priorities**

The first output serves the first strategic objective outlined above. It seeks to engage parliamentarians, with whom lies the primary responsibility for evolving the anti-corruption legislative agenda in Lebanon, but many of whom have been elected to the Parliament for the first time following the latest general elections in May 2018. In addition, it seeks to engage representatives of political parties and civil society along with representatives of key concerned ministries (justice, finance, etc.) and public institutions (audit bureau, central inspection, etc.) in an informed dialogue on anti-corruption legislative priorities in Lebanon and the way forward in line with the UNCAC.

Important progress has been achieved on this front in recent years, with the assistance of UNDP and other international partners, leading to the adoption of the law on the right of access to information in 2017 and the anti-corruption whistle-blower protection bill in 2018, and the finalization of other key bills dealing with key themes such as anti-illicit enrichment, asset declaration, and establishing a specialized anti-corruption agency. This progress, however, was made over a relatively long period of time, spanning more than a decade, and with relatively limited political support and public engagement. The broad agreement that is emerging recently on the importance of taking those bills forward, including in the announced national anti-corruption strategy, can be undermined in practice. Influencing factors include the country’s infamous political volatility, but more specifically, the main threat emerges from the limited capacity that exists in the newly elected Parliament and the lack of sufficiently active and informed civil society engagement on this critical agenda.

The “ACT Lebanon” PIP proposes to focus on building the capacities of parliamentarians and representatives of political parties and civil society, while engaging them along with other key stakeholders in a structured process of dialogue that is designed to enable both the adoption of the pending bills and better implementation of the ones that have been adopted so far. This will be done through a series of inter-connected seminars, trainings and workshops that will be anchored in a broader national discourse and boosted through two major conferences, which will be held in February and December 2019 to take stock of progress and inform the way forward. In parallel, this process, which will be supported by ongoing technical assistance will be further complemented by dedicated support to the stakeholders that demonstrate leadership and commitment in relationship to the adopted law on the right of access to information, including through training concerned officials of ministries, public institutions and municipalities, as well as funding innovative and catalytic initiatives to watchdogs from civil society in Lebanon.

The planned activities will create and empower an informed demand-side that is more closely and systematically engaged with the supply-side around specific legislative priorities. This is expected to significantly increase the likelihood of impact, defined here in enhancing the comprehensiveness and implementation of anti-corruption legislation in Lebanon in line with the UNCAC. The results achieved under this Output can be sustained, replicated and scaled up through the establishment of such a network of informed and empowered stakeholders. This network will be supported to produce a report that outlines the results achieved and recommendations for the way forward, to be submitted to President of the Republic, the Parliament, and the Government. This work will directly contribute to the implementation of

the national anti-corruption strategy and can easily be integrated in it once formally adopted. Ultimately, it will enhance the levels of transparency and accountability in the country and enable it to make further progress on achieving its national development priorities, including in relation to SDGs, particularly SDG 16, and related international commitments including under the CEDRE Conference.

## **Output 2: Participatory processes established in selected vulnerable sectors to assess related corruption risks and pilot corresponding mitigation measures**

The second output serves the second strategic objective outlined above. It seeks to build national capacities on corruption risk management, which is a critical tool for successful corruption prevention, as identified in the announced national anti-corruption strategy, and as evidenced in recent comparative experiences. It can provide an alternative and potentially more effective approach to achieving concrete successes that can be felt by the public, compared to the criminal law enforcement approach that seeks to penalize corrupt behaviour, and which is generally more prone to obstruction and failure, especially in contexts, like Lebanon, where there is severe polarization at the socio-political level and where institutions are not sufficiently established and capacitated to investigate, prosecute and convict the corrupt.

Integrating corruption risk management capacities in the public sector is a challenging endeavour and requires investment to secure political buy-in, introduce technical know-how, and change organizational culture. Recent related experiences in the Arab states region and beyond, using UNDP's methodology in this regard, have demonstrated the feasibility of this approach and its added value including resources saved and stakeholders perceptions improved in sectors such as the health and customs. Lebanon is one of the countries that have expressed readiness to engage in such cooperation; and has indeed integrated related elements in the announced national anti-corruption strategy.

The "ACT Lebanon" PIP proposes to initiate this effort starting with three pilot sectors that are relevant to the Government plan and overall vision that was presented at the international CEDRE Conference and which also have a direct impact on the perceptions of the business community and the population of Lebanon and their experiences with its public administration. The selected sectors are the health, customs and public works sectors. The proposed work will support the establishment, institutionalization and training of multi-stakeholder task forces for corruption risk management in the three pilot sectors, while providing technical assistance to produce and disseminate corruption risk assessments in selected areas under each of them, followed by related mitigation plans. In parallel, the PIP will be supporting the design and roll out of pilot innovative mitigation measures (e.g. behavioural insights and ICT solutions) to reduce risks of corruption in at least two of the three pilot sectors.

The planned activities will generate good practices and lessons learned that will help the pilot sectors to clearly articulate preventive anti-corruption policies and practices, which are tailored to their own specificities, while also inspiring other sectors to follow suit. This is expected to significantly increase the likelihood of impact, defined here in reducing sector-specific corruption risks that would otherwise waste public funds and adversely affect the performance of the sector in question. The results achieved under this Output will be sustained, replicated and scaled up through institutionalization of corruption risk management across the government, starting with the pilot sectors. Each sectoral task force will be supported to produce a report that outlines the results achieved and recommendations for the way forward, to be submitted to President of the Republic, the Parliamentary Committee, and the relevant Ministry. This work will directly contribute to the implementation of the national anti-corruption strategy and can easily be integrated in it once formally adopted. Ultimately, it will enhance corruption prevention capacities in government and enable further progress on achieving its national development priorities, including in relation to the SDGs and related international commitments including under the CEDRE Conference.

The “ACT Lebanon” PIP will include a dedicated gender lens in the implementation of the interventions outlined under both outputs, and will draw on the support from the gender team established within UNDP Lebanon.

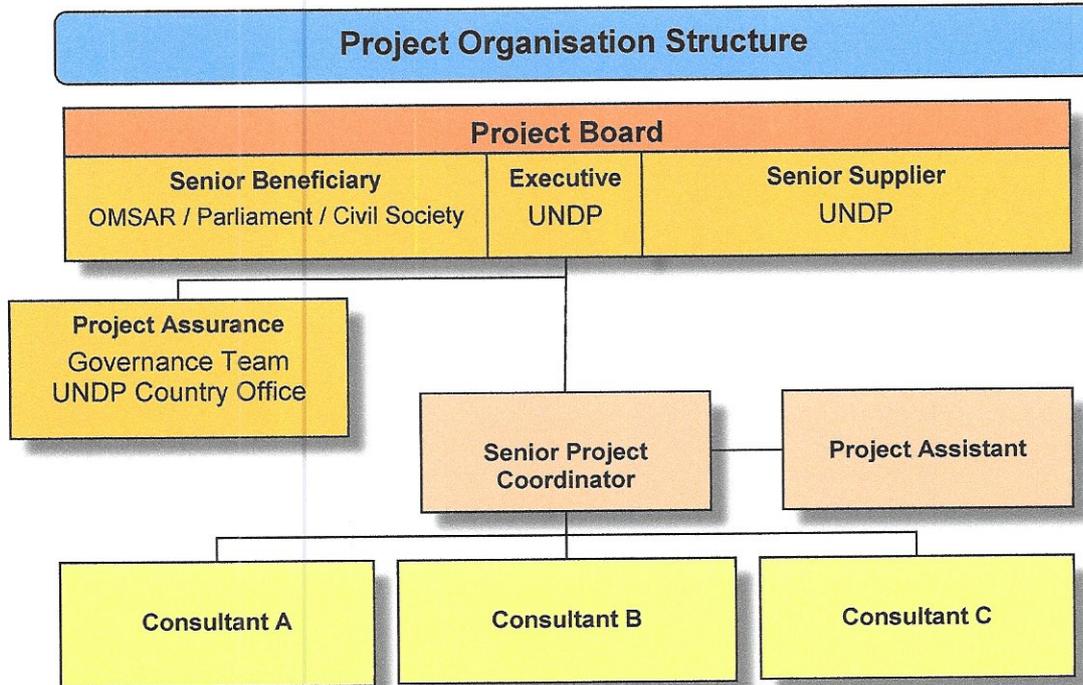
For the first output related to legislative priorities, UNDP will place particular emphasis on engaging female members of parliament (as initiated through the “Parliamentarians against corruption” initiative which was initiated in December 2018) and women’s civil society organizations (with whom UNDP has worked on issues related to human rights, the Rule of Law, and elections) in the context of the overall dialogue on anti-corruption legislative priorities in Lebanon, and the establishment of a network of informed and empowered stakeholders to advocate for the adoption of pending bills in Parliament and their implementation. It will also ensure that technical assistance that will be provided to the finalization of pending laws and/or the implementation of new/existing laws focuses on gender issues and practical ways/recommendations to strengthen women’s rights, such as in the case of access to information for example, with specific recommendations formulated and disseminated in this regard. Innovative funding to be provided to civil society will also gender concerns as a key priority.

For the second output related to corruption risk management, the selection of the priority areas that will be assessed for corruption risks in each sector under consideration will be decided with gender equity and women’s empowerment as one of the criteria. Furthermore, the corruption risk assessments in each of the three pilot sectors will draw on a gender analysis and will be informed by inputs on how corruption impacts women and men differently. Gender-informed risk assessments will then likely produce dedicated recommendations for corruption risk mitigation that address the specific needs and agencies women, such in the case of corruption in maternity sections in public hospitals for example. Those findings will be formulated and disseminated as an integral part of national anti-corruption legislative agenda.

Overall, the implementation of the strategy “ACT Lebanon” PIP will build upon UNDP’s support to the ministerial and technical national anti-corruption committees and concerned civil society actors, as well as to key institutions such as the Lebanese Parliament, the Office of the Minister of State for Administrative Reform (OMSAR) and the Ministry of Finance. The PIP will also be keen to engage civil society actors as well as the business community, including for example through the Economic and Social Council. It will also draw on the extensive experience of UNDP’s regional project on Anti-Corruption and Integrity in Arab Countries (ACIAC), located in Lebanon, while building on the earlier support provided by UNDP’s global and regional programmes to Lebanon in recent years, including on participatory UNCAC self-assessment, and on anti-corruption in health, customs, education, water and sanitation. Finally, it will provide inputs towards the operationalization of the UN-WB Compact in Lebanon, which focuses, among other things, on anti-corruption cooperation, and for which the UNDP and the World Bank have been identified as co-leads to facilitate the development of a joined-up vision and strategy.

---

### III. MANAGEMENT ARRANGEMENTS



---

### IV. MONITORING

The project team will establish a regular project monitoring framework and produce a quarterly progress report as well as a final report at the end of the Initiation Plan, using the standard format available in the Executive Snapshot.

Specially the following risks have been identified during the design of the PIP.

<p>The government formation is further stalled, rendering the approval of the national anticorruption strategy and its strategy a remote possibility.</p>	<ol style="list-style-type: none"> <li>1) The PIP was designed to maintain momentum for the endorsement of the national strategy for anticorruption and its implementation plan, while the political process of government formation is underway. The former government has overseen the development of the strategy and was supportive of it, but it was not able to formalize its adoption in time before the election, while noting that composition of the new government is not likely to be very different from the former one, including the nominated Prime Minister who is still the same.</li> <li>2) Advancing on key elements of the national anticorruption strategy is not premised on its official approval, as was recently outlined by the recent approval of Parliament of the law on whistle-blower protection and repeatedly affirmed by senior government officials. As such the proposal focuses on three key elements of the strategy – i.e. advancing and completing the legislative framework; engaging civil society and the private sector and working with key sectors on anti-corruption risk assessments and mitigation strategies.</li> </ol>
<p>The Parliament does not prioritize the legislative agenda related to anti-corruption, in view of other competing priorities.</p>	<ol style="list-style-type: none"> <li>1) The fact that the Parliament recently approved law on whistle-blower protection is an encouraging sign in terms of the priorities of the Parliament, in line with the commitments and reform agenda presented by the Government during the CEDRE conference. But there are also many other priorities, and particular support must be created to ensure that the Parliament continues prioritizing anti-corruption legislation, not in terms of adoption only, but also in terms of monitoring implementation.</li> <li>2) To promote collective action in this regard that is more likely to overcome resistance to the anti-corruption legislative agenda, UNDP is also in the process of building a network of relevant actors to build the demand for this legislative agenda, starting with reviving the “Parliamentarians against corruption” network for Lebanon and building bridges to ensure that there is a systematic and well-informed engagement by civil society and the business community in related efforts.</li> </ol>
<p>In the absence of a new government, it may be difficult to garner the necessary commitment to undertake risk-based assessments and strategies in selected sectors.</p>	<ol style="list-style-type: none"> <li>1) The PIP identifies a few sectors where a preventive approach – based on initial discussions with key counterparts in these Ministries in the framework of the development of the national anti-corruption strategy which UNDP supported. The finalization of the sectors under consideration will therefore be based on further commitment within the relevant administrations, with preference for Ministries where UNDP has a presence.</li> </ol>

## V. ANNUAL WORK PLAN

Year: 2018-2019

EXPECTED OUTPUTS <i>And baseline, indicators including annual targets</i>	PLANNED ACTIVITIES <i>List activity results and associated actions</i>	TIMEFRAME 2019				RESPONSIBLE PARTY	PLANNED BUDGET		
		Q1	Q2	Q3	Q4		Funding Source	Budget Description	Amount
<p>Output 1</p> <p>Key stakeholders are enabled to advocate and monitor the adoption and implementation of anti-corruption legislative priorities</p> <p>Indicator: # of new specialized anti-corruption bills amended and/or passed</p> <p>Baseline: 0</p> <p>Targets: 3</p> <p>Indicator: scope of compliance with access to information law by ministries and municipalities</p> <p>Baseline: to be established</p> <p>Target: 50% increase</p> <p>Indicator: # number of gender-specific policy recommendations formulated and disseminated to enhance the content and implementation of anti-corruption legislation</p>	<ul style="list-style-type: none"> <li>Organize 2 high-level parliamentary seminars on the UNCAC and the legislative gaps and related efforts in Lebanon, with specific engagement of women's MPs and the "Parliamentarians against corruption" initiative</li> <li>Organize 5 consultative meetings with civil society representatives (including representatives from women's organizations) to support them in identifying issues, priorities and strategy for supporting the national anti-corruption legislative agenda</li> <li>Provide training to appointed information officers in the public administrations on the implementation of the access to information law</li> <li>Provide technical assistance to the parliament to finalize the pending bills (with a dedicated focus on gender equality) and submit them for adoption</li> </ul>	X				UNDP	Workshops Local Consultants	6,000 5,000	
		X	X	X		UNDP	Workshops Local Consultants	10,000 5,000	
			X			UNDP	Workshops Local Consultants	6,000 5,000	
		X	X	X	X	UNDP	Workshops Travel Local Consultants Int. Consultants	7,000 20,000 14,000 14,000	

<p>Baseline: 0</p> <p>Target: one set of recommendations per each bill or law</p> <p>Related CP outcome: "Government institutions core state functions and capacities strengthened for accountability and policy formulation and reform enhanced",</p>	<ul style="list-style-type: none"> <li>Organize a bi-monthly meeting with political party representatives to review progress and enable dialogue on policy directions to advance the national anti-corruption legislative agenda</li> </ul>	X	X	X	X	UNDP	Workshops Local Consultants	12,000 5,000
	<ul style="list-style-type: none"> <li>Organize a first national participatory conference on anti-corruption legislations (progress achieved and the way forward)</li> </ul>	X				UNDP	Workshops Local Consultants Publication	10,000 5,000 5,000
	<ul style="list-style-type: none"> <li>Provide funding, based on a competition, civil society initiatives to monitor and publicly report on the progress of the implementation of the access to information law</li> </ul>		X			UNDP	Grant(s) Local Consultants	60,000 15,000
	<ul style="list-style-type: none"> <li>Organize a second national participatory conference on anti-corruption legislations (progress achieved and the way forward)</li> </ul>				X	UNDP	Workshops Local Consultants Publication	10,000 5,000 5,000
	<b>Total Output 1</b>							
<p>Output 2</p> <p>Participatory processes are established in selected vulnerable sectors to assess related corruption</p>	<ul style="list-style-type: none"> <li>Support the establishment, institutionalization and training of multi-stakeholder task forces for corruption risk management in three pilot sectors (e.g. health, customs and public works)</li> </ul>	X	X			UNDP	Workshops Local Consultants	15,000 20,000

<p>risks and pilot corresponding mitigation measures</p> <p><i>Indicators: # of participatory processes (with representation from women's organizations) to assess corruption risks in the pilot sectors</i></p> <p><i>Baseline: 0</i></p> <p><i>Targets: 3</i></p> <p><i>Indicators: # of gender informed corruption risk mitigation plans produced in the pilot sectors</i></p> <p><i>Baseline: 0</i></p> <p><i>Targets: 2</i></p> <p><i>Indicators: level of reduction in risk levels achieved in the pilot sectors (none = 0 / slight = within same level / moderate = from one level to the other / significant = more than one level)</i></p> <p><i>Baseline: to be established by the corruption risk assessments</i></p> <p><i>Targets: moderate in 2 sectors</i></p> <p><i>Related CP outcome: "Government institutions core state functions and</i></p>	<ul style="list-style-type: none"> <li>Provide technical assistance to produce and disseminate corruption risk assessments in selected areas under each of the three pilot sectors, drawing on a gender analysis</li> </ul>	X	X		UNDP	Workshops Local Consultants	5,000 20,000
	<ul style="list-style-type: none"> <li>Organize a workshop for each sector on corruption prevention entry points therein and related good practices and lessons learned from past efforts in Lebanon and comparative experiences</li> </ul>		X		UNDP	Workshops Local Consultants	15,000 5,000
	<ul style="list-style-type: none"> <li>Support the design and roll out of pilot innovative and gender informed mitigation measures (e.g. behavioral insights and ICT solutions) to reduce risks of corruption in at least two of the three pilot sectors</li> </ul>		X	X	UNDP	Workshops Local Consultants Equipment	5,000 30,000 18,729
	<ul style="list-style-type: none"> <li>Provide technical assistance to the task force in each sector to develop a gender informed action plan for corruption risk mitigation and submit for formal adoption</li> </ul>		X	X	UNDP	Workshops Local Consultants	5,000 15,000
	<ul style="list-style-type: none"> <li>Organize a national participatory conference to enable each sector to present the results of the sectoral corruption risk assessment and mitigation plan and inform way forward</li> </ul>			X	UNDP	Workshops Local Consultants Publication	15,000 5,000 5,000

capacities strengthened for accountability and policy formulation and reform enhanced",	Total Output 2	178,729
TOTAL		402,729
GMS (7%)		28,191
GRAND TOTAL		430,920