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PROJECT DOCUMENT

Regional Project

Project Title: *Regional Project on Anti-Corruption and Integrity in Arab Countries*

Project Number: 00079157

Implementing Partner: UNDP

Start Date: Dec 2019 **End Date:** Dec 2023 **PAC Meeting Date:** February 21, 2020

Brief Description

Governance is both a means and an end for sustainable development. This is reflected in the 17 Goals and 169 targets of the 2030 Global Agenda for Sustainable Development. This worldwide consensus has also become integral to the development discourse in the Arab States region, especially in the context of the ongoing transformations triggered in 2011, which underscores a myriad of vulnerabilities, some of which are common to several countries, and even the entire region. The seminal Arab Human Development Report series and other major studies have demonstrated that those vulnerabilities find their roots in governance deficits, weakening the legitimacy of state institutions and equality before the law, and diverting away resources from services and projects that would have otherwise improved the lives of millions.

Stakeholders in the Arab States region have embarked on various governance reforms since the 1990s, albeit with varying results and limited impact on the daily life of people. By and large, related reform initiatives seemed to avoid key issues, prime among which was the issue of corruption. Indeed, until recently, corruption had been treated as a taboo, nearly banned from public debate and undermined by an over emphasis on sporadic technical solutions to governance deficits. Not only has the persistence of those deficits accentuated the region's developmental challenges and fuelled conflict and instability, but it also poses a standing threat to its future, undermining its resilience to serious political, economic, social, demographic, and environmental pressures.

An increasing number of Arab countries are adopting and implementing national anti-corruption strategies and establishing specialized anti-corruption agencies and/or related multi-agency mechanisms. They are also enacting legislative reforms and seeking to strengthen law enforcement. The progress made so far, however, seems to fall well below public expectations and is far from what governments are striving to achieve in terms of increased efficiency and effectiveness of public administration and reduced barriers for foreign and local investment and doing business. To make additional and more sustainable progress against corruption in the Arab States region, there is a need for further institutionalization of related measures across government and the public-private interface on the one hand, and the mobilization of a more aware and better empowered demand for change across society on the other. The opportunity to move forward is ripe, given the unprecedented levels of political support and public demand for anti-corruption in the Arab States region in light of deep-rooted developmental challenges; and UNDP is well positioned to enable Arab countries to capitalize on this opportunity.

The *Anti-Corruption and Integrity in Arab Countries* (ACIAC) regional project is conceived to strengthen cooperation and promote collective action against corruption in targeted countries of the Arab region. It will be implemented across the Arab States region prioritizing seven countries (Egypt, Iraq, Jordan, Lebanon, Morocco, Palestine and Tunisia). The overall aim of the project is to enable institutions and systems to address awareness, prevention and enforcement of anti-corruption measures to maximize availability of resources for poverty eradication and contribute to the establishment of inclusive and effective governance in line with SDG 16. To serve its goal, the regional project shall implement interconnected activities that are designed to achieve three outputs:

Output 1: Multi-country cooperation enhanced to promote the effective and inclusive implementation of the UN Convention against Corruption;

Output 2: Corruption risk management processes institutionalized in key vulnerable sectors across region; and

Output 3: Arab Anti-Corruption and Integrity Network supported to transform into the region's leading sustainable organization promoting SDG 16

While seeking to achieve those outputs, the project will also address cross-cutting issues namely, women empowerment; citizen engagement with a focus on the youth; knowledge production, sharing and dissemination; and building concrete synergies with the protection of the environment.

In doing all the above, the project is expected to benefit 2,660 (approximately 380 per target country) public officials, including 1,680 government officials, 490 anti-corruption and audit officials, 490 judges and prosecutors, in addition to 30 members of Parliament from the priority countries and 2,450 (approximately 350 per target country) non-governmental practitioners, including 1,450 civil society representatives, 210 representatives of business associations and networks and 790 representatives of youth groups and networks. It shall endeavour to ensure gender parity on a 50/50 basis in the totality of the project's beneficiaries.

Contributing Outcome (RPD):

RPD (2018-2021) Outcome 2: Strengthen institutions to promote inclusive participation, prevent conflict and build peaceful societies

Output 2.2.1 Institutions and systems enabled to address awareness, prevention and enforcement of anti-corruption measures

Indicative Output(s) with gender marker2:

Output 1 Multi-country cooperation enhanced to promote the effective and inclusive implementation of the UN Convention against Corruption (GEN 2)

Output 2 Corruption risk management processes institutionalized in key vulnerable sectors across region (GEN 2)

Output 3 Arab Anti-Corruption and Integrity Network supported to transform into the region's leading sustainable organization promoting SDG 16 (GEN 2)

Total resources required:	USD 9,247,525	
Total resources allocated:	USD 9,247,525	
	UNDP TRAC:	
	KOICA:	USD 9,247,525
	Government:	
	In-Kind:	
Unfunded:		

UNDP



Khaled Abdelshafi
Director, Regional Hub for Arab States, RBAS

Date: April 27, 2020

DEVELOPMENT CHALLENGE

The Arab states region is seeking to shape and respond to the 2030 Global Agenda for Sustainable Development in the face of unprecedented political, economic, environmental and social pressures and risks. Many longstanding development challenges in the Arab countries are historically rooted in governance deficits,¹ weakening the legitimacy of state institutions and equality before the law and diverting resources from services and projects that would otherwise improve the lives of millions.

Governance deficits pose a standing threat to the future of the region, undermining its resilience to political, economic, social, demographic, and environmental pressures. In terms of governance efficiency and effectiveness, some countries, especially those affected by conflict, experience a collapse of local government systems, which adversely affects public service delivery. On the other hand, security considerations in other countries seem to have led to the tightening of public space, less freedom of expression and association, and declining civil society and public participation, which had its negative impact on governance reform. This has fueled citizens' lack of confidence in institutions and translated into an unlikeliness to use the ballot box, especially for youth.² Apart from some successes, overall progress towards good governance following the 2011 Arab uprisings was relatively slow, and in many cases perceived as cosmetic or detached from local realities. This widened the trust gap between citizens and state and increased socio-economic inequalities. Furthermore, the failure of governance structures and processes to target horizontal relationships among different social groups increased their feeling of alienation in their own countries. In many countries, especially those in conflict, there has been an erosion of already-weak public capacity, both at the national and local levels, posing corruption as a threat not only to governance but to human rights also. Linkages between corruption and human rights are inherent. Corruption impacts not only the availability of basic services but also affects their quality and accessibility. Moreover, access to information and freedom of speech are crucial for the effectiveness of any anti-corruption mechanisms. Among this multitude of challenges, corruption continues to be a salient feature in the public debate on development and a top reform priority for a growing number of countries in the Arab states region. This was reaffirmed at the consultation held on "development priorities and challenges in a changing Arab region" ([Amman, Jordan on 22-23 May 2017](#)), where participants clearly articulated the need to focus the governance agenda on transparency and accountability issues. They called for escalating the drive against corruption in the framework of the Sustainable Development Goals (SDGs), highlighting its strong relevance to the broader efforts aimed at stabilizing the region and supporting its resilience to unprecedented political, economic, social and environmental pressures. There is growing evidence that high levels of corruption impoverish populations, increase inequality, and cause the deterioration of living conditions, especially among the **most vulnerable population groups**. The recent recognition of the nexus between corruption and insecurity including conflict, violent extremism and more broadly socio-economic vulnerabilities further reinforces this drive.

Most Arab countries have undertaken visible steps since 2004 to enhance their legislative frameworks against corruption, including the ratification of the UN Convention against Corruption (UNCAC) and the adoption of specialized anti-corruption and integrity laws. Those steps accelerated in recent years, namely after the transformative events of 2011, including the adoption of related constitutional amendments such as in Morocco and Tunisia and various other legal reforms related to access to information, whistleblowing, financial disclosures, illicit enrichment, conflict of interest and public procurement. Some of those reforms are stalling for various reasons, while others have already been adopted into law, including most recently the access to information law in Lebanon and the whistle-blower protection law in Tunisia. Whereas developing quality laws and passing them through the legislative process is a challenge on its own, the more daunting challenge is to ensure proper implementation. As the level of efficiency of public administration determines the extent to which corruption can find fertile soil and sprout, this requires more articulate political support and robust programmes to build related capacities in the public administration, including the training of responsible officials and the use of information and communication technologies. It also requires

¹ For extensive analysis, see the 2004 Arab Human Development Report (AHDR): Towards Freedom in the Arab World.

² AHDR 2016: Youth and the Prospects for Human Development in a Changing Reality.

additional support to enable the judiciary to enforce those laws in an impartial and effective manner and to ensure that individual judges are held accountable and provided with the necessary resources and independence from political interference as well as from their own judicial authorities. The legislative and oversight roles of parliaments are also important to consider, especially that they have often been overlooked in related discussions. Providing tailored support to parliaments is likely to add value to the development and implementation of anti-corruption and integrity laws, especially in certain countries that have advanced on the democratic path. Similarly, the role of civil society including women's organizations, and the business community needs to be taken into account given the contributions that they can make to enhance the quality of the laws in the drafting phase and beyond where they can monitor and report violations and utilize collective action to advocate higher levels of compliance.

Compared to only four countries in 2010, now fifteen countries in the region have formal national anti-corruption strategies being implemented or developed. Many of them, however, are too ambitious and lack the necessary financial and human resources to implement them, as well as proper systems to monitor and evaluate them. Moreover, the priorities identified in those strategies are often too broad and not necessarily based on proper planning and consultation, with little attention given to specific corruption problems or well-defined vulnerabilities, thus making the achievement of concrete results very challenging.

Notwithstanding those limitations, national anti-corruption strategies have succeeded in expanding the space for dialogue and action against corruption across the region and are helping to mobilize stronger support to related reforms, while also increasing the involvement of key stakeholders. Achieving additional progress requires the rethinking of those strategies to make them more results-oriented and more focused on corruption prevention beyond generic awareness-raising campaigns. As the capacity limitations in specialized institutions, governmental and non-governmental stakeholders has been identified among the underlying causes of widespread corruption in the target countries, making progress also requires, more training on planning, monitoring and evaluation; more funding to support the implementation of specific projects under those strategies; and more platforms to strengthen political support and increase the participation of line ministries, civil society and businesses in related efforts.

As for specialized anti-corruption agencies in place, their number has risen from four in 2010 to fifteen by 2019, noting that only seven of them currently have a national strategy in place, including Egypt, Jordan, Kuwait, Lebanon, Morocco, Saudi Arabia and Tunisia. Although diverse in their mandates and structures most of the fifteen specialized agencies, face similar challenges including fragile independence, leadership gaps, insufficient resources, and limited powers especially when it comes to investigating corruption. This is compounded by their reliance on case-handling as a principal approach for action in an overall environment where the rule of law is relatively weak, and their negligence of preventive approaches that could be useful in such contexts such as corruption risk management and the utilization of behavioral insights. To move towards this direction, additional support is needed to help those agencies safeguard their independence, expand their powers in law and in practice, enhance their technical capacities and enable them to establish better collaboration with the judiciary, the media, the business community and civil society.

Despite the progress achieved in recent years across the region, some old obstacles remain, and new ones emerge, requiring stronger support from national governments and the international community alike (see the project's strategy for details on how the project will address or help overcome some of these obstacles). Certain Arab countries like Qatar and the United Arab Emirates had always scored well on international governance-related indices, with a few others starting to exhibit signs of progress lately, despite the challenging regional political and security landscape. Those include Egypt, Jordan, Kuwait, Morocco, Saudi Arabia and Tunisia, albeit not necessarily on all aspects of good governance and certainly not at the same pace. Overall, however, the Arab region is still lagging compared to global averages. On "Voice and Accountability" and the "Rule of Law" of the Worldwide Governance Indicators (WGI) published by the World Bank, the region scores below the global average.³

Zooming in closer on the issue of corruption, the 2018 Corruption Perception Index (CPI) of Transparency International, scores the regional average at 34.1, compared to a global average of

³ For more, please visit <https://info.worldbank.org/governance/wgi/#home>.

43. This shows progress compared to 2017 regional score which was 33.38 points, noting that the individual scores of thirteen out of the twenty-one Arab countries, covered by the CPI, have improved, while two remained the same, and the remaining seven countries regressed.⁴

As for the countries selected under this project, according to the Corruption Perception Index of 2018, issued by Transparency International, only three including Jordan (49/100), Morocco and Tunisia (43/100) scored higher or within the global average of 43, Egypt (35/100) scored higher than the regional average of 34.1 but still much below the global average, and Iraq (18/100) and Lebanon (28/100) scored way below both the regional and global average. Palestine is not ranked on the Corruption Perception Index for the lack of data but reports by the local chapter of Transparency International continue to outline the serious challenges that the country faces in this regard.⁵

While increased public awareness and the presence of specialized anti-corruption and integrity strategies and agencies, coupled with unprecedented economic pressures, all provide important opportunities to move forward, key challenges persist. Those include pressures that undermine the inclusiveness of related policy dialogues, limitations in the *de jure* and *de facto* implementation of the UN Convention against Corruption, capacity gaps in specialized institutions, in addition to structural and transactional weaknesses in sectoral policies and practices that increase vulnerabilities to corruption, and finally the lack of sufficient data and evidence on the state of corruption and how it links to other development issues in the region, which ultimately undermine the ability to mobilize the much needed additional support for the anti-corruption and integrity agenda and its nexus with SDG agenda.

Continuing to move forward requires sustaining and scaling up the reform momentum in the face of implicit resistance, and a host of competing development priorities and security challenges, which are exacerbated by violent conflict and the political and economic context. Succeeding in this, however, is not likely to be a matter of short-term isolated projects alone, but rather a longer-term investment in generating action-oriented knowledge and empowering a larger number of stakeholders to engage in collective action, including women and youth.

I. STRATEGY

The design of the project benefited from a theory of change exercise undertaken by UNDP in 2017, by which key development challenges and programmatic solutions were jointly identified. This was driven by analysis and reflection on the causes of development challenges, based on available evidence and learning on what works and what does not in the diverse and crisis-affected contexts which characterize the Arab region, drawn from experiences of the regional bodies, UN and development agencies, country partners and civil society organizations. The process helped identify solutions to effectively address the causes of problems that hinder progress, and guide decisions on which approaches should be taken in the programme, considering the comparative advantages of the partners to the initiative, effectiveness and feasibility of proposed activities, and various risks that are part of any change process. Based on an analysis of challenges and root causes, a set of solutions have been developed which serve as the core set of outputs and activities under this project.

The **Problem and Solution Tree Diagram** below illustrates the linkages between the identified causes and development challenge.

Causes	Causal consequences	Problems to be solved	Activities to solve defined problems	Outputs	Outcomes	Objectives
Cause 1.1.1 Insufficient capacity to	Causal consequence 1.1	Capacity gaps for inclusive and effective	Activity 1.1 Activity 1.2	Output 1.1: <i>Regional cooperation</i>	Outcome 1: <i>Enhance</i>	Objective 1: To promote the <i>de jure</i> and <i>de facto</i>

⁴ For more, please visit <https://www.transparency.org/cpi2018>.

⁵ Transparency International 2018, <https://www.transparency.org/cpi2018>

draft and monitor specialized laws	Limited progress on the implementation of the UN convention against corruption	implementation of the UN Convention against Corruption	Activity 1.3	<i>enhanced to promote the effective and inclusive implementation of the UN Convention against Corruption</i>	<i>ment of region-wide compliance with the UN Convention against Corruption</i>	implementation of the UN Convention against Corruption
Cause 1.1.2 Limited cross-border cooperation			Activity 1.4			
Cause 1.1.3 Weak trust and cooperation between governments and non-governmental actors			Activity 1.5			
			Activity 1.6			
			Activity 1.7			
			Activity 1.8			
Activity 1.9						
Cause 2.1.1 Political and socio-economic drivers increasing incentive to be corrupt	Causal consequence 2.1 Corruption undermining effectiveness of sectors key for SDG achievement	Problem 2 Capacity gaps for corruption prevention in key vulnerable sectors	Activity 2.1	Output 2.1: <i>Corruption risk management processes institutionalized in key vulnerable sectors across region</i>	Outcome 2: <i>reinforce ment of the effectiveness of the public administration</i>	Objective 2: To institutionalize corruption prevention in key vulnerable sectors to enhance effectiveness of public administration
Cause 2.1.2 Weak law enforcement and rule of law			Activity 2.2			
Cause 2.1.3 Vested interest networks that exploit weak and ambiguous governance systems in key vulnerable sectors			Activity 2.3			
			Activity 2.4			
			Activity 2.5			
			Activity 2.6			
Activity 2.7						
Activity 2.8						
Activity 2.9						
Cause 3.1.1 Lack of awareness on importance of anti-corruption for SDGs	Causal consequence 3.1 Inadequate attention and resources	Problem 3 Capacity gaps in the ability to develop and advocate well-informed	Activity 3.1	Output 3.1: Arab Anti-Corruption and Integrity Network supported to transform into	Outcome 3: <i>development of region-wide collective</i>	Objective 3: To mobilize sustainable regional evidence-based action-oriented support

Cause 3.1.2 No coherent and coordinated strategies to promote SDG 16	are being allocated to address the synergies between anti-corruption and SDGs achievement	demands and positions for achievement of SDG 16	Activity 3.2	the region's leading sustainable organization promoting SDG 16	<i>action capacity to achieve Sustainable Development Goal 16</i>	for the achievement of SDG 16 through an anti-corruption lens
Cause 3.2.1 Gaps under SDG 16 drive violence and instability and risk relapse to violence			Activity 3.3			
			Activity 3.4			
			Activity 3.5			
			Activity 3.6			
			Activity 3.7			
			Activity 3.8			
			Activity 3.9			

As one of the underlying causes of corruption is the insufficient capacity of regional and national institutions to draft and monitor specialized laws, improved compliance with global and regional commitments will be achieved through enhanced regional cooperation to promote the effective and inclusive implementation of UNCAC. This will lead to increased accountability and decreased levels of corruption, by enabling institutions and systems to address awareness, prevention and enforcement of anti-corruption measures to maximize availability of resources for poverty eradication and contribute to the establishment of inclusive and effective governance in line with SDG 16.

Another set of underlying causes stem from weak law enforcement and rule of law. This enhances the risk that vested interest networks will exploit weak and ambiguous governance systems in key vulnerable sectors, leading to corruption undermining the effectiveness of these sectors which are key for the achievement of the SDGs and core to fulfilling human rights. By institutionalizing corruption risk management processes in key vulnerable sectors across region, the effectiveness of public administration will be enhanced, thus leading to a better enabling environment for anti-corruption and integrity reforms to flourish.

Lastly, the lack of awareness on importance of anti-corruption for SDGs and the consequent lack of coherent and coordinated strategies to promote it, undermines the implementation of any strategy and intervention towards this goal. By supporting the Arab Anti-Corruption and Integrity Network (ACINET), and other country-specific platforms and networks as needed, this proposed intervention will enable it to become the region's leading organization promoting SDG 16 and therefore, contribute to the development of region-wide collective action to achieve SDG 16.

The project is conceived as a **regional instrument that will strengthen cooperation and promote collective action against corruption in the Arab countries and add value to related bilateral and multilateral cooperation efforts**. It will draw on UNDP's extensive governance portfolio, its vast global network of experts and partners, and its well-recognized comparative advantages.⁶ It will particularly benefit from the achievements and lessons learned of the regional project on Anti-Corruption and Integrity in Arab Countries (ACIAC) -part of the United Nations Development Programme's (UNDP) Regional Programme for Arab States UNDP-, and its strong and diverse partnerships in the region and beyond.

ACIAC has been operating since 2011 and has so far produced remarkable results at the regional and national levels, as evidenced by stakeholder feedback and independent evaluations. ACIAC contributed to strengthening national capacities in 18 Arab countries and provided concrete technical

⁶ UNDP, Anti-Corruption Practice Note, 2008, pp. 9-11.

assistance to more than 360 governmental and non-governmental stakeholders, with key results achieved in 8 countries in close collaboration with the UNDP Country Offices.

Key lessons learned that inform the way ahead include at least five major elements as outlined below.

First, the **UNCAC has emerged as the main entry point for anti-corruption reforms in the Arab region**. It has mobilized the attention of Arab governments and created a new space for interaction with non-governmental actors and peer governments outside the region. It provided a solid basis, in a very short period, for a franker and more focused dialogue on anti-corruption. However, certain fragile countries have not been able to progress on the UNCAC implementation which requires more dedicated efforts. Supporting UNCAC implementation is demanding and challenging, even for advanced countries. This is due to the large scope of the Convention and the broad phrasing of some of its articles, especially those found in the chapter dealing with prevention measures. Accordingly, both normative- and capacity-related support is urgently needed to enable the proper implementation of the Convention in multiple Arab countries. Consequently, real progress on UNCAC implementation is almost impossible without the concerted cooperation of different regional and global actors that have the requisite institutional knowledge and experience to help countries make the necessary changes. **Therefore, the multi-country approach needs to be complemented by a regional dimension that fosters cooperation.**

Second, **the absence of proper assessments and the inadequacy of financial and technical support present themselves as the two most common deficits** in current anti-corruption reform processes in the Arab region. Aside from their actual effectiveness, these measures may prove problematic. They may be viewed as an expression of political commitment, but there is also a high risk that they may be viewed as purely cosmetic or, simply unsuccessful, thus potentially eroding trust in governments and fueling disappointment and frustration. Accordingly, the legitimacy of anti-corruption efforts would be reinforced by focusing support on incremental reforms that deliver small but concrete successes. The cumulative process of gradual changes will increase the political momentum and will widen the anti-corruption measures.

Third, there is a need and a strong demand to increase complementarities between regional- and country-level activities through designing model approaches, conceptual frameworks and specialized products for different Arab countries that have expressed an interest in enhancing their anti-corruption efforts. **The limited focus on reinforcing complementarities between regional- and country-level efforts did not enable Arab countries to establish concrete linkages between the progress achieved on the anti-corruption agenda at the regional-level, and the national-level development agenda.** Strengthening integrity in sectors such as healthcare, justice, education, water, telecommunication, construction, transportation and others is critical to the achievement of the SDGs, extending beyond SDG 16 to other SDGs including but not limited to SDGs 3, 4, 5, 7 and 9. Reinforcing regional-country complementarities to support sectoral integrity initiatives in multi-country for example, will help generate knowledge and transfer skills on mainstreaming integrity standards and practices in key vulnerable sectors in a more effective manner, and will also facilitate joint learning between the Arab countries that face similar challenges and express similar demands.

Fourth, supporting ACINET as an inclusive Arab-owned regional anti-corruption mechanism is a major demand for Arab stakeholders who insist on involving as many countries as possible in this process. **Expanding participation in ACINET is critical to sustain and increase the current levels of ownership. Nevertheless, the network's Charter provides for a more focused approach** by enabling the establishment of sub-groups that address specific situations and common challenges. This flexibility provides an excellent opportunity to support more contextualized approaches, without undermining the added value of having an inclusive regional process that fosters regional anti-corruption cooperation and informs country-level initiatives. In this regard, the need to address challenges that are particular to crisis-affected countries, emerge as a strong need articulated by different stakeholders in the Arab region.

Fifth, the deeply entrenched gap in confidence and communication between governments and non-governmental actors, especially civil society organizations across the region makes a participatory approach to anti-corruption reforms a particularly challenging endeavor. Bridging this gap has proven to be very difficult, if related efforts are only limited to national processes. **Repositioning civil society organizations as legitimate and active anti-corruption partners requires an impartial regional platform that focuses on capacity development and enables direct and**

coordinated dialogue with governmental actors. ACINET promises to provide such a platform, noting that its members have already exhibited readiness and interest to benefit from the regional dynamics to invigorate cooperation efforts at the country-level.

The regional project is **aligned with the priorities and entry points that have been identified in consultation with a wide array of key national stakeholders and UNDP Country Offices across the region.**⁷

The needs addressed in this project have been identified based on the findings of the relevant country reports under the UNCAC review mechanism⁸ and analytical reviews of national anti-corruption strategies and priorities articulated by national counterparts in bi-lateral meetings held with UNDP Country Offices and national counterparts over the period of 2016-2017, in addition to the regional focus group discussions held on the side of the 7th Session of the Conference of States Parties to the UNCAC (Vienna, 06-10 November 2017), the recently held consultation on “development priorities and challenges in a changing Arab region” ([Amman, Jordan on 22-23 May 2017](#)), and the sixth Ministerial Conference of the Arab Anti-Corruption and Integrity Network (ACINET) held in Baghdad in April 2018, in which the Chairperson of the Anticorruption and Civil Rights Commission (ACRC) at the Republic of Korea spoke to participants via teleconference.

The assessments revealed that there are rooms for progress towards more effective and inclusive implementation of the UN Convention against Corruption, including related capacity building, various legal and regulatory gaps especially in relation to corruption prevention (e.g. access to information, conflict of interest, asset declaration, procurement, etc.), but also in relation to criminal law enforcement, and the promotion of informal as well as formal cooperation between governmental and non-governmental stakeholders on related implementation efforts. It was also identified that multi-country cooperation adds clear value to the formulation of appropriate responses to those needs because it creates appropriate incentives and peer-learning opportunities, which have shown to accelerate progress and mitigate risks associated with the politicization of the agenda of exclusionary practices of certain stakeholders.

Furthermore, countries also shared the view that anti-corruption and integrity efforts need to be taken down to the ground in specific sectors to maximize the return on investment of related interventions and make results more visible for ordinary citizens as well as the investors when relevant. Nonetheless, the lack of appropriate tools and platforms to enable this shift posed a serious challenge. Partners agreed that the most suitable way forward is to integrate and institutionalize corruption risk management processes in key vulnerable sectors, including capacity development, the preparation of sectoral corruption risk assessments and mitigation plans and enabling the implementation of innovative pilot responses that maybe replicated and scaled up elsewhere.

Other needs were identified at the collective regional level, especially in relation to the strengthening of the Arab Anti-Corruption and Integrity Network and supporting it to establish action-oriented linkages with the SDG agenda and especially SDG 16. This included lack of data and evidence on key issues such as the linkages between corruption and service delivery, women empowerment, youth engagement, and preventing violent extremism.

The project is **guided by the Regional Programme Document (2018-2021), specifically with output 2.2.1 “Institutions and systems enabled to address awareness, prevention and enforcement of anti-corruption measures”, as well as with output 1.2.3 of the UNDP Strategic Plan 2018-2021.** The project helps countries of the region achieve the 2030 Agenda for Sustainable Development, particularly contributing to SDG target 16.5 “substantially reduce corruption and bribery in all their forms” and 16.6 “Develop effective, accountable and transparent institutions at all levels”.

In addition, two independent evaluation reports commissioned by UNDP in 2015 and 2017 confirm the relevance of the work proposed and the focus on anti-corruption. The project is further justified by the increased interest on the side of Arab countries, as well as on the side of UNDP, to invigorate

⁷ Please see (i) Declaration on Strengthening the Rule of Law and the Supporting UNCAC Implementation in the Arab Countries; (ii) ACINET Resolution N. 1/009; (iii) Conclusions of the Regional Workshop on Witness and Whistleblower Protection (2-3 April 2009); (iv) Report of the Regional Seminar on Addressing the Challenges of Corruption (20-22 April 2009); and (v) Final Report on the 2nd Anti-Corruption Community of Practice in the Arab States Region.

⁸ Please see <https://www.unodc.org/unodc/en/treaties/CAC/country-profile/index.html>.

development efforts in the Arab region and accelerate the achievement of the SDGs, which are undermined by corruption and poor governance.

Building on the above, this regional project is adopting a regional approach that focuses its activities on low- and middle-income countries in the region, which have scored below the global CPI average and have acknowledged at the highest level of government the need for stronger anti-corruption efforts. The selection also prioritizes countries that have, or had recently established, relative stability at the political and security situation, while also having strong Country Office presence for UNDP; moreover, it also prioritized countries that are actively represented in ACINET, are States Party to the UNCAC and have set up clear and specialized anti-corruption arrangements in place including a national agency and a national strategy. Those elements establish favorable basis for meaningful action for integrity and anti-corruption along the lines conceived by the ACIAC regional project.

Gender Mainstreaming and Women's Empowerment

Empowering women to become a more prominent actor in anti-corruption efforts in the Arab States region, by helping them identify challenges, shape priorities, and integrate their concerns in related initiatives is a priority within all project's activities. The project recognizes that insufficient women's involvement presents a barrier to action and full achievement of the SDGs.

Acknowledging their differentiated needs and engagement modalities, the focus on women will be applied at different levels. At the level of national strategies and sectoral work, ACIAC will look specifically into how youth and women are particularly vulnerable to corruption in service delivery.

This will look into assessing the impact of corruption on women and will also identify targeted entry points and strategies to address the synergy of anti-corruption and gender inequality. ACIAC will also have a comprehensive approach that focuses on the engagement of youth and women, as partners, and not solely beneficiaries, in promoting governance reforms and stronger accountability. To this end, ACIAC will support inclusive networks and mechanisms that foster collective action models (representatives of government, business, civil society, academia, women's organizations, media etc...). Finally, ACIAC will promote the representation of women and youth as members of national anti-corruption commissions as well as of the ACINET and its non-governmental group, and in the task forces that will be created in the framework of the project.

II. RESULTS AND PARTNERSHIPS

Expected Results

The overall aim of the project is to capitalize on the political commitment that has been forged in the area of anti-corruption over the past few years to promote the *de jure* and *de facto* implementation of UNCAC and related international standards and good practices, with a view to contributing to good governance and development efforts in the Arab region. In particular, the project will contribute to the achievement of **Outcome 2 of the UNDP Regional Programme Document 2018-2021: Strengthen institutions to promote inclusive participation, prevent conflict and build peaceful societies; specifically, with output 2.2.1 "Institutions and systems enabled to address awareness, prevention and enforcement of anti-corruption measures"**. The following outputs will enable institutions and systems to address awareness, prevention and enforcement of anti-corruption measures to maximize availability of resources for poverty eradication and contribute to the establishment of inclusive and effective governance in line with SDG 16.

In view of the above, the planned interventions of the project aim at achieving the following results: Output 1: multi-country cooperation enhanced to promote the effective and inclusive implementation of the UN Convention against Corruption.

This output seeks to set an enabling environment for other outputs and activities, by filling capacity gaps for inclusive and effective implementation of the UN Convention against Corruption. This will be achieved through the following activities:

- Conduct capacity assessments for anti-corruption agencies, supreme audit institutions and civil society organizations

- Provide technical assistance to formulate capacity development plans for anti-corruption agencies, supreme audit institutions and civil society organizations
- Organize regional workshops for governmental and non-governmental organizations to promote exchanges of experiences and expertise on anti-corruption awareness, prevention and enforcement
- Hold specialized regional trainings of trainers for governmental and non-governmental stakeholders to develop, implement and monitor effective and inclusive national anti-corruption and integrity strategies
- Support national partners to follow up on the regional workshops and trainings including through country specific communication campaigns and capacity development events
- Set up inclusive processes to review the compliance of national laws and regulations with UNCAC requirements
- Organize country-specific and multi-country workshops to identify and share good practices and lessons learned
- Provide technical assistance to the drafting and / or amendment of related laws and regulations
- Hold specialized regional trainings of trainers for governmental and non-governmental stakeholders on implementation of related laws and regulations

Output 2: Corruption risk management processes institutionalized in key vulnerable sectors across region

Corruption is undermining the effectiveness of key sectors towards the achievement of the SDGs. This problem will be addressed through the following activities:

- Develop implementation guides for corruption risk management in the transportation, education, water, and energy sectors (health already developed) in consultation with public users of the services.
- Develop training materials for corruption risk management in the transportation, education, water, and energy sectors (health already developed)
- Develop regional studies to promote dialogue on nexus between anti-corruption and effectiveness in the health, transportation, education, water, and energy sectors
- Organize regional workshops to identify challenges and opportunities for corruption prevention in the health, transportation, education, water, and energy sectors
- Organize regional working group meetings to inform and sustain corruption prevention efforts in selected sectors
- Establish and train joint country-specific multi-stakeholder teams to assess and mitigate corruption risks in selected sectors
- Provide technical assistance to develop corruption risk maps for each sector along with mitigation plans and indicators to track progress
- Provide technical assistance and procurement support to introduce specific corruption prevention measures in pilot sites in selected sectors
- Support bi-lateral or multi-lateral exchanges on successful corruption risk management solutions in specific sectors within the region and beyond including through country missions and the documentation of case studies

Output 3: Arab Anti-Corruption and Integrity Network supported to transform into the region's leading sustainable organization promoting SDG 16.

This output seeks to address the lack of awareness on importance of anti-corruption for SDGs achievement, the lack of coherent and coordinated strategies to promote SDG 16, and the gaps under SDG 16 that drive violence and instability and risk relapse to violence. This will be achieved through these activities:

- Organize three ministerial conferences in partnership with ACINET in 2020, 2022 and 2023 to promote and secure high-level political commitment to SDG 16
- Set up a regional center of excellence for ACINET that supports the effective integration of anti-corruption and integrity in SDG implementation strategies
- Develop regional studies on the nexus between corruption and each of the following topics violent extremism, women empowerment, youth, and private sector engagement
- Organize regional conferences to identify challenges and opportunities for tackling the nexus between corruption and the identified priority issues for the region
- Support national partners to follow up on the recommendations of the regional conferences including through country specific dialogues and formulation of related actions plans
- Support ACINET's Non-Governmental Group to develop and disseminate position papers on SDG 16 issues, including the role of economic media and the role of local government.
- Establish and train a regional task force, on a gender-parity basis, under ACINET to promote corruption risk assessment of draft laws drawing on the Korean ACRC methodology
- Establish and train a regional task force, on a gender-parity basis, under ACINET to advocate and monitor reforms for a more transparent and accountable justice system drawing on the ACINET methodology
- Provide technical assistance to national partners to adapt and execute methodologies for corruption risk assessment in draft laws, as well as implementation of article 11 of the UNCAC

Resources Required to Achieve the Expected Results

The project will achieve the above stated outputs through a grant of \$ 9,247,525 from the Korea International Cooperation Agency (KOICA). The project results are achievable as UNDP has put in place a clear strategy, availability of personnel with experience in the areas of focus as well as a buy-in from stakeholders of the need to engage in anti-corruption activities.

The project will be managed and coordinated by the UNDP Regional Programme for Arab States, which will also directly implement regional activities. UNDP Country Offices in targeted countries will be responsible, whenever possible, for implementing activities at the national and local level, with support from the Regional Programme.

The UNDP Project Management structure consists of roles and responsibilities that bring together the various interests and skills involved in, and required by, the project. The project management structure consists of the following:

- The **Project Board (or Steering Committee)** which is comprised of representatives of UNDP, the Korean International Cooperation Agency and of relevant national institutions. The Board is the group responsible for making management decisions for the project for a successful completion of delivery of support. In order to ensure UNDP's ultimate accountability, the Project Board decisions should be made in accordance with standards and protocols that shall ensure management for development results, best value for money, fairness, integrity, transparency and effective international competition.
- A **Chief Technical Advisor (CTA)**, appointed by UNDP, has the authority to run the project on a day-to-day basis within the authorities being defined by the Project Board. Primary responsibility of the CTA consists of ensuring that the project produces the results (outputs) specified in the project document, to the required standard of quality and within the specified scope of time and costs. The CTA cooperates with representatives/officials of the beneficiaries at national and regional level in function of requirements of activities of the project and its outcomes. This partnership would be established taking account of relevant working mechanisms and those of the decision making in use by the beneficiaries.

The team will be composed of:

- **Three Specialists:** each Specialist will coordinate the implementation of the activities under one of the three project outputs and report to the CTA, providing policy input and advice, securing, supporting and monitoring tasks delegated to ad-hoc experts, contributing to trainings, and carrying out planning, execution and monitoring of related project activities.

- **Three Analysts:** each Analyst will support the implementation of the activities under one of the three project outputs and report to the Specialists, providing technical input and advice, assisting in trainings, and developing background materials for planning, execution and monitoring of project activities.
- **Coordination and Communication Officer:** The officer will support the CTA in coordinating and communicating with project beneficiaries and partners and the media, including the development of related materials and ensuring that project websites and online outlets are properly updated.
- **Research and Reporting Officer:** The officer will support the CTA in research and reporting to ensure that the project is updated on key trends and developments globally, across the region, and in target countries, and that the project is compliant with internal and external reporting requirements, including the preparation of related materials and the documentation of successes and lessons learned.
- **Seven Project Associates/Assistants:** each associate/assistant will be designated to assist in project implementation in the target countries supporting the concerned Country Offices and developing and maintaining a high-quality portal for ACINET members. They will also assist in conducting basic research as necessary and background documentation for ToRs development, etc.
- **High-level technical expertise:** targeted and specialized expertise will be provided by various experts/consultants who will be contracted as relevant.

The project team and the CTA would benefit of support to be provided by the Management Support Unit under the Regional Programme of Regional Bureau for Arab States in terms of making logistics arrangements and administration works, included procurement and completion of contractual arrangements of recruitment of experts working for the project. They are also responsible for the compliance of administrative, financial works to rules and regulations by UNDP.

Dedicated professional communication staff in the region – both from UNDP regional Hub in Amman as well as from UNDP Country Offices - will ensure awareness and visibility on the proposed action, especially vis-à-vis beneficiaries and local and national authorities.

All the costs related to the staff have been adequately estimated and included in the project budget.

Partnerships

At the base of the programme is a core focus on building multi-stakeholder partnerships at regional and country levels for anti-corruption. ACIAC builds on consolidated regional and country platforms and strong relationships with key governmental and non-governmental stakeholders and draws upon achievements and lessons learned of its work over the past seven years. Harnessing collaborative expertise across international, regional and national partners will be critical to generating integrated solutions, building on good practices and models across countries and from other regions. UN partners engaged in this initiative recognize that addressing complex and integrated development challenges requires bringing knowledge and expertise together from across the development community and from regional and local institutions.

As per the UN Secretary General's Report on Strengthening the UN Development System, "UNDP's comprehensive mandate and track-record on multidimensional poverty, capacity development and institutional strengthening, positions it as a vehicle to support an integrated, multi-sectoral and multi-stakeholder approach".

The project will be implemented by UNDP Regional Programme for Arab States in cooperation with UNDP Country Offices in the targeted countries, and engagement of key stakeholders in these countries. Cooperation will also take place with:

- the three branches of host governments of targeted countries, as well as local and regional civil society organizations, women's associations and youth groups.
- other UN agencies (e.g. WHO, UNODC) will be sought to maximize on different comparative advantages, as well as with the League of Arab States whenever possible.
- ACINET and its Non-Governmental Group (membership is open to representatives of civil society, business community, academia and media), which is the region's leading internationally recognized participatory mechanism for capacity development, information exchange and policy dialogue in this field.

The project is the only initiative which addresses anti-corruption issues at the regional level and in multiple Arab countries and which adopts a systematic approach in a series of Arab countries. Some activities supported by bi-lateral donors at the country level exist, such as a USAID-supported project in Jordan as well as interventions in Palestine funded by European donors. In addition, UNDP is also implementing anti-corruption initiatives in Egypt and in Tunisia, respectively supported by the African Development Bank and KOICA. In some countries, governments also have sporadic dedicated initiatives in addition to some national anti-corruption strategies that are developed and implemented with UNDP support.

ACIAC is already working in synergy with all the above-mentioned initiatives, which contribute to the same outcome. Therefore, while coordinating and avoiding overlapping with these initiatives, ACIAC will build on their results and complement them, and add a unique value by adopting a regional and multi-country approach. This dimension allows to have a consistent but tailored approach, which can benefit from good practices and lessons learned from the different countries.

Finally, ACIAC will work in collaboration with other UN agencies where their technical expertise is needed. For example, over the past years ACIAC has worked hand in hand with the UNDP Aid for Trade Initiative in Arab States and the World Custom Organization to reduce the risk of corruption in the custom sector particularly in Lebanon and in Iraq. It has also worked with the World Health Organization to benefit from its technical expertise in the healthcare sector to identify corruption risks. A regular collaboration will also be in place with the UN Office for Drugs and Crime given its role as the Secretariat of the UNCAC.

Risks and Assumptions

As noted in the Risk Management plan, there are a number of risks to be mitigated. This spans from political instability and conflict in the Arab region, to commitment of partners to achieving project's results, to finding effective expertise to recruit into the project office. To that end, mitigation measures have been taken to address all these and other risks, as elaborated in the Risk Management plan.

A particular set of mitigation actions were taken during project design, building strong ownership, partnership, trust and commitment among regional and UN system partners to jointly achieve outcomes. In particular, early involvement of key beneficiary countries into the design and planning of this intervention through consensus and capacity building activities, besides regular consultations and reviews of feedbacks received from countries and beneficiaries will mitigate the risk of insufficient political commitment to adopt reform and legal instruments for the implementation of the UNCAC and adoption of risk-management approach at the sectoral level.

The level of security varies in each of the target countries. The project closely followed political developments across the region and aligned the scope of regional activities accordingly. Continuous monitoring of the political situation will be carried on throughout the implementation of the project (e.g. through the Arab unrest index of EIU). In addition, in-country activities will be limited in case of security threats.

The risk of inadequate human resources to constitute the project office will be mitigated through collaboration with academic institutions and networks of human resources of UN Agencies, as well as by coaching and reinforcing the technical capacity of local experts. In terms of local activities, risks are mitigated by the strong local presence and partnerships of UNDP Country Offices in all countries.

Overall, the legacy of UNDP partnerships and systems used for programming over the past fifty years across the region will serve as an important basis for achieving results under this project and minimizing risks to output delivery.

Stakeholder Engagement

In addition to the strong partnerships developed during project formulation with regional and national entities and UN partners, as elaborated in the above Partnership section, the formulation of the project is also based on extensive and close consultation with **a wide array of key stakeholders and UNDP Country Offices across the region.**

Beneficiaries will include public officials, including government officials, anti-corruption and audit officials, judges and prosecutors, besides members of Parliament, non-governmental practitioners, including civil society representatives, representatives of business associations and networks and representatives of youth groups and networks and representatives of women's organizations and networks.

Beneficiaries will be identified through several processes including those which are already existent such as the criteria of selection for the ACINET and ACINET non-governmental group, or those which will be effective during the execution of the project such as the criteria of selection for the task forces that will be created under 3.

Stakeholder engagement at the country level will build on UNDP's long-standing Country Office presence and partnerships with a wide range of stakeholders. The project shall endeavor to ensure gender parity in the totality of the project's beneficiaries.

As explained above, the needs addressed in this project have been identified based on the findings of relevant country reports under the UNCAC review mechanism⁹ and analytical reviews of national anti-corruption strategies and priorities articulated by national counterparts in bi-lateral meetings held with UNDP Country Offices and national counterparts over the period of 2016-2017, in addition to the regional focus group discussions (November 2017), the recently held consultation on "development priorities and challenges in a changing Arab region" ([May 2017](#)), and the sixth Ministerial Conference of ACINET (April 2018).

Also, the needs of beneficiaries will be further identified through the capacity assessments that will be done in the framework of the project (output 1, activity 1.1).

Indirect beneficiaries of this project will benefit in terms of the know-how institutionalized within the State and society, and the overall improvement in the performance of State institutions, the playing field levelled for businesses, and the quality of life enhanced for citizens. Besides national authorities and civil society organizations, these include the business community, as a collective entity that demonstrably has a vested interest in reduced corruption and increased integrity in the interface between the public and the private sector, and individual citizens and residents of the target countries, as a collective entity that demonstrably has a vested interest in reduced corruption and increased integrity in their interface with government services including in the sectors prioritized under this project.

South-South and Triangular Cooperation (SSC/TrC)

Well beyond the conventional approach of engaging government agencies, the programme will also support innovative partnerships with civil society, private sector and bring forth the diversity of expertise in local UN Country Teams. This will also include brokering of knowledge and models for local results through south-south collaborations, across countries in the region and links to other regions. South-south and tri-angular cooperation will be fostered within the region and beyond to enable thinking global and acting local on the SDG agenda. In particular, Output 1 will contribute to promoting a number of related legal and regulatory reform proposals which will be formulated with support of south-south exchanges.

Knowledge

Knowledge production, sharing and dissemination will be a cross-cutting priority of the project and it will be managed at different levels:

- Production: sectoral and thematic assessment and studies will be conducted at the regional and national level, resulting in the development of knowledge products. In addition, best practices and lessons learned will be compiled and analyzed from the different country experiences.
- Sharing: regional and national policy dialogue will be the main avenue for sharing knowledge among different stakeholders. These fora are of particular importance for sharing lessons learned and best practices in addressing corruption issues and constitute a unique platform for open and transparent discussion.

⁹ Please see <https://www.unodc.org/unodc/en/treaties/CAC/country-profile/index.html>.

- Dissemination: ACIAC will invest on online dissemination and sharing of knowledge products through three main existing tools, namely the [ACIAC website](#), the [ACINET website](#) and the [UNDP Knowledge Platform for Arab States](#). These constitute a repository of knowledge, data and information which is public and accessible by all project stakeholders and beyond.

By leveraging its strategic regional and multi-country position, ACIAC will nurture regional dialogue bringing together national stakeholders to share best practice and lessons learned in selected areas related to anti-corruption and transparency.

As the region's most comprehensive and inclusive mechanism for knowledge networking and policy dialogue in its field, ACINET will offer a unique platform to promote cooperation and collective action against corruption in the region. Knowledge will be produced through different assessments and studies, at the regional and country level, and on different thematic areas that are identified by regional project's stakeholders. ACIAC will invest on online dissemination and sharing of knowledge products through three main existing tools, namely the ACIAC website, the ACINET website and the UNDP Knowledge Platform for Arab States.

Sustainability and Scaling Up

ACIAC is designed to ensure project sustainability on different fronts, including the processes that will be established to trigger policy and legislative change, the corruption risk management capacities that will be institutionalized within the selected sectors, the investment in ACINET as an overarching framework owned by Arab countries for capacity development, information exchange and policy dialogue, and the engagement with women and youth, as explained below in more detail.

First, the project's proposed work is anchored in broader governance efforts at the country level. The project will not stop at supporting stakeholders to develop policy and legislative but will also create processes that will have the legitimacy to carry out the advocacy effort until those proposes are adopted. Related information will be put in the public domain to ensure that stakeholders, which will also be trained by this project, continue to monitor implementation well after the project is closed.

Second, the project shall equip civil servants from national and sectoral institutions with the capacities needed to ensure better management of resources and corruption risks beyond the life of this project. The specialized capacities developed under the project will be institutionalized across several ministries, enabling the beneficiary institutions to sustain the knowledge and skills acquired by their staff, who will also be trained by the project disseminate them further to their peers.

Third, the multidimensional support to ACINET aims to sustain and increase the current levels of ownership and technical expertise at the regional level, where the track record shows that peer encouragement and peer learning have great potential given the particular nature of commonalities that exist between the countries in the region. Among other things, the project will support ACINET to create a series of political and technical commitments for its members, articulated in the various outcome documents that will emerge from the ministerial conferences and other related activities envisioned in this project. This will shape and elevate the regional discourse in a manner that increases the cost of regression by national stakeholders later and creates pressure to scale up efforts in the future.

Fourth, the work with youth, women and civil society is intended to strengthen their knowledge and capacity to act against corruption and promote their future proactive engagement. This is an investment in sustainability given how better-informed youth and women groups may act as long-term advocates and monitors of reforms related to their daily lives and rights as citizens.

III. PROJECT MANAGEMENT

Cost Efficiency and Effectiveness

This project builds on the various previous regional projects and activities implemented by UNDP since 2011. It will expand partnerships and consolidate the regional networks established developing their capacities and ensuring successful implementation of activities. To ensure quality and timely delivery of the project outputs, the project will be guided by polices to guarantee the optimal use of funds. UNDP implements a competitive bidding process that ensures maximum value for money. Efficiency will be also achieved using strong project planning and results-based implementation.

The project will use a comprehensive approach taking into consideration the prevention and reduction of corruption in the targeted countries of the Arab States region. It will impact how efficiently governments manage resources both at the national and at the sectoral level, which will have a positive impact on the services that citizens benefit from at local levels. This will contribute to improving citizens' trust in institutions and strengthening inclusive participation.

Project Management

This project will be implemented through the UNDP Direct Implementation Modality (DIM) where the UNDP regional programme assumes full substantive and financial responsibility and accountability for all project deliverables. All aspects of project implementation will comply with UNDP policies and procedures. Leadership on the management of the project will be provided by the UNDP regional program coordinator and the Director of the Regional hub.

To ensure effectiveness of programme delivery, a dedicated project office will be formed during the implementation of the project. The establishment of such a team will be carried out in a cost-effective manner, establishing mid-level positions to match the stated outputs in the project while maintaining UNDP's quality assurance standards.

Project management support will be provided from UNDPs Regional Hub, which has offices in Amman and Lebanon, to ensure cost-efficiency and effectiveness in work plan implementation. This will include UNDPs Regional Programme Team Leader for effective management and oversight of the programme, supported by its Management Support Unit (MSU) based in Beirut for results and resource management through its consolidated delivery mechanism. UNDP ACIAC Team based in Beirut, will support project coordination and policy support to partners in achieving outputs. At the country level, UNDPs Country Offices will play a key operational role as a platform for implementing local activities under the project.

An annual monitoring and evaluation plan, including risks and mitigating measures, will be developed on the basis of the annual work plan developed by the project and the UNDP quality assurance unit. The project is part of the overall regional programme quality assurance structures which include a solid results-based monitoring system and data collection and monitoring capacity.

IV. RESULT FRAMEWORK

Intended Outcome as stated in the Regional Programme Results and Resource Framework: Strengthen institutions to promote inclusive participation, prevent conflict and build peaceful societies

Outcome indicators as stated in the Regional Results and Resources Framework, including baseline and targets:

RP Outcome indicator:

Proportion of persons who had at least one contact with a public official and who paid a bribe to a public (SDG 16.5.1) Baseline: 32.7 (2016)

RP output:

2.2.1 Institutions and systems enabled to address awareness, prevention and enforcement of anti-corruption measures (Strategic Plan 1.2.3)

Output indicators:

2.2.1.1 Number of proposals adopted by public and private entities to reduce vulnerabilities to corruption in specific sectors and across them

Baseline: 0 / Target: 4

Source: Countries' laws/by-laws; ACINET's ministerial statements; project reports/evaluation

Frequency: Annual

2.2.1.2 Number of regionally supported products and platforms enabling wider participation in transparency and accountability dialogues and reforms

Baseline: 0 / Target: 8

Source: National Transparency Centers; project reports/evaluation

Frequency: Annual

Project title and Atlas Project Number: Anti-Corruption and Integrity in Arab Countries (ACIAC) 00079157

EXPECTED OUTPUTS	OUTPUT INDICATORS ¹⁰	DATA SOURCE	BASELINE		TARGETS (by frequency of data collection)						DATA COLLECTION
			Value	Year	2019	2020	2021	2022	2023	FINAL	
Output 1 Multi-country cooperation enhanced to promote the effective and inclusive implementation of the UN Convention against Corruption	1.1 Number of beneficiaries (disaggregated by country, type and gender) participating in related capacity building activities	Project Reports	0	2019	1,000	500	500	500	300	2,800	Desk review and field monitoring. Project Staff
	1.2 Number of related legal and regulatory reform proposals formulated with support of south-south exchanges	Government Publications	0	2019	0	7	7	7	0	21	Legal research. Project staff and consultants
	1.3 Number of joint events held between governmental and non-governmental stakeholders on UNCAC implementation	Project Reports	0	2019	20	10	10	20	10	70	Desk review and field monitoring. Project staff

Output 2 <i>Corruption risk management processes institutionalized in key vulnerable sectors across region</i>	2.1 <i>Number of beneficiaries (disaggregated by country, type and gender) participating in related capacity building activities</i>	<i>Project Reports</i>	0	2019	1,000	500	500	500	300	2,800	Desk review and field monitoring. Project staff
	2.2 <i>Number of sectors / countries with corruption risk assessments and mitigation plans completed</i>	<i>Government Reports</i>	0	2019	0	0	9	9	9	27	Government reports. Project Staff
	2.3 <i>Number of regional sector-specific working groups active in supporting corruption prevention for effectiveness</i>	<i>ACINET Reports</i>	0	2019	0	3	2	0	0	5	ACINET report Project staff
Output 3 <i>Arab Anti-Corruption and Integrity Network supported to transform into the region's leading sustainable organization promoting SDG 16</i>	3.1 <i>Number of beneficiaries (disaggregated by country, type and gender) participating in related capacity building activities</i>	<i>Project Reports</i>	0	2019	1,000	500	500	500	300	2,800	Desk review and field monitoring. Project staff
	3.2 <i>Number of regional studies / papers developed to foster evidence-based dialogue on achievement of SDG 16 targets</i>	<i>ACINET Reports</i>	0	2019	0	4	4	4	0	12	ACINET and Project Reports. Project staff
	3.3 <i>Number of national strategies supported to address synergies between corruption and SDG implementation</i>	<i>Government Reports</i>	0	2019	0	0	3	3	1	7	Government Reports. Project staff

¹⁰ It is recommended that projects use output indicators from the Strategic Plan IRRF, as relevant, in addition to project-specific results indicators. Indicators should be disaggregated by sex or for other targeted groups where relevant.

V. MONITORING AND EVALUATION

In accordance with UNDP's programming policies and procedures, the project will be monitored through the following monitoring and evaluation plans: *[Note: monitoring and evaluation plans should be adapted to project context, as needed]*

Monitoring Plan

Monitoring Activity	Purpose	Frequency	Expected Action	Partners (if joint)	Cost (if any)
Track results progress	Progress data against the results indicators will be collected and analysed to assess the progress of the project in achieving the agreed outputs. A bi-annual update, using KOICA template, shall record progress towards the completion of key results	Every six months	Slower than expected progress will be addressed by project management.	N/A	Included in overall budget
Monitor and Manage Risk	Identify specific risks that may threaten achievement of intended results. Identify and monitor risk management actions using a risk log. This includes monitoring measures and plans that may have been required as per UNDP's Social and Environmental Standards. Audits will be conducted in accordance with UNDP's audit policy to manage financial risk.	Every six months	Risks are identified by project management and actions are taken to manage risk. The risk log is actively maintained to keep track of identified risks and actions taken.	N/A	Included in overall budget
Learn	Knowledge, good practices and lessons will be captured regularly, as well as actively sourced from other projects and partners and integrated back into the project.	At least annually	Relevant lessons are captured by the project team and used to inform management decisions.	N/A	Included in overall budget
Annual Project Quality Assurance	The quality of the project will be assessed against UNDP's quality standards to identify project strengths and weaknesses and to inform management decision making to improve the project.	Biennially	Areas of strength and weakness will be reviewed by project management and used to inform decisions to improve project performance.	N/A	Included in overall budget
Project Report	An annual progress report will be developed, using KOICA's template, and presented each year to the Project Board	Annually	Any quality concerns or slower than expected progress should be discussed by the project	N/A	Included in overall budget

	and key stakeholders, consisting of progress data showing the results achieved against pre-defined annual targets		board and management actions agreed to address the issues identified.		
Synthesis Report	A final report will be developed at the end of the project, using KOICA's template, synthesising together the findings of the various annual reports, and it shall be presented to the Project Board and key stakeholders.	End of project	The review conducted as a result of the report would inform future action and enable the evaluation of work achieved.	N/A	Included in overall budget

VI. MULTI-YEAR WORK PLAN ¹¹¹²

EXPECTED OUTPUTS	PLANNED ACTIVITIES	Planned Budget by Year					RESPONSIBLE PARTY	PLANNED BUDGET		
		2019	2020	2021	2022	2023		Funding Source	Budget Description	Amount
Output 1: Multi-country cooperation enhanced to promote the effective and inclusive implementation of the UN Convention against Corruption <i>Gender marker: 1</i>	1.1 Conduct capacity assessments for anti-corruption agencies, supreme audit institutions and civil society organizations	280,000	0	0	0	0	UNDP	KOICA	Staff Travel Events	100,000 100,000 80,000
	1.2 Provide technical assistance to formulate capacity development plans for anti-corruption agencies, supreme audit institutions and civil society organizations	160,000	0	160,000	20,000	0	UNDP	KOICA	Staff Consultants Travel Events	180,000 40,000 60,000 60,000
	1.3 Organize regional workshops for governmental and non-governmental to promote exchanges of experiences and expertise on anti-corruption awareness, prevention and enforcement	60,000	120,000	0	0	0	UNDP	KOICA	Staff Travel Events	20,000 20,000 60,000 60,000
	1.4 Hold specialized regional trainings of trainers for governmental and non-governmental stakeholders to develop, implement and monitor effective and inclusive national anti-corruption and integrity strategies	16,000	30,000	66,000	0	0	UNDP	KOICA	Staff Consultants Travel Events	20,000 12,000 40,000 40,000
	1.5 Support national partners to follow up on the regional workshops and trainings including through country specific communication campaigns and capacity development events	0	150,000	205,000	50,000	0	UNDP	KOICA	Staff Consultants Travel Events	155,000 50,000 50,000 150,000
	1.6 Set up inclusive processes to review the compliance of national laws and regulations with UNCAC requirements	0	120,000	0	0	0	UNDP	KOICA	Staff Travel	80,000 40,000

¹¹ Cost definitions and classifications for programme and development effectiveness costs to be charged to the project are defined in the Executive Board decision DP/2010/32

¹² Changes to a project budget affecting the scope (outputs), completion date, or total estimated project costs require a formal budget revision that must be signed by the project board. In other cases, the UNDP programme manager alone may sign the revision provided the other signatories have no objection. This procedure may be applied for example when the purpose of the revision is only to re-phase activities among years.

	1.7 Organize country-specific and multi-country workshops to identify and share good practices and lessons learned	0	100,000	100,000	100,000	0	UNDP	KOICA	Staff Consultants Travel Events	50,000 50,000 90,000 110,000
	1.8 Provide technical assistance to the drafting and / or amendment of related laws and regulations	50,000	120,000	80,000	20,000	0	UNDP	KOICA	Staff Consultants Travel	100,000 100,000 70,000
	1.9 Hold specialized regional trainings of trainers for governmental and non-governmental stakeholders on implementation of related laws and regulations	46,000	45,000	120,000	0	0	UNDP	KOICA	Staff Consultants Travel Events	75,000 25,000 30,000 80,000
	Sub-Total for Output 1	612,000	685000	731000	190000	0				2,218,000
Output 2: Corruption risk management processes institutionalized in key vulnerable sectors across region <i>Gender marker: 2</i>	2.1 Develop implementation guides for corruption risk management in the transportation, education, water, and energy sectors (health already developed)	140,000	0	0	0	0	UNDP	KOICA	Staff Consultants Travel	40,000 75,000 25,000
	2.2 Develop training materials on for corruption risk management in the transportation, education, water, and energy sectors (health already developed)	100,000	0	0	0	0	UNDP	KOICA	Staff Consultants Travel	20,000 60,000 20,000
	2.3 Develop regional studies to promote dialogue on nexus between anti-corruption and effectiveness in the health, transportation, education, water, and energy sectors	250,000	0	50,000	0	0	UNDP	KOICA	Staff Consultants Travel Events	100,000 100,000 50,000 50,000
	2.4 Organize regional workshops to identify challenges and opportunities for corruption prevention in the health, transportation, education, water, and energy sectors	0	0	400,000	0	0	UNDP	KOICA	Staff Consultants Travel Events	100,000 50,000 150,000 100,000
	2.5 Organize regional working group meetings to inform and sustain corruption prevention efforts in selected sectors	0	0	120,000	120,000	0	UNDP	KOICA	Staff Travel Events	100,000 100,000 40,000
	2.6 Establish and train joint country-specific multi-stakeholder teams to assess and mitigate corruption risks in selected sectors	100,000	100,000	100,000	0	0	UNDP	KOICA	Staff Consultants Travel Events	100,000 50,000 100,000 50,000

	2.7 Provide technical assistance to develop corruption risk maps for each sector along with mitigation plans and indicators to track progress	0	205,000	312,000	175,000	0	UNDP	KOICA	Staff Consultants Travel Events	200,000 200,000 92,000 200,000
	2.8 Provide technical assistance and procurement support to introduce specific corruption prevention measures in pilot sites in selected sectors	0	0	540,195.35	169,558.46	47,888.89	UNDP	KOICA	Staff Consultants Travel Events	200,643 300,000 100,000 100,000
	2.9 Support bi-lateral or multi-lateral exchanges on successful corruption risk management solutions in specific sectors within the region and beyond including through country missions and the documentation of case studies	0	0	240,000	0	28,000	UNDP	KOICA	Staff Travel Events	100,000 100,000 68,000
	Sub-Total for Output 2	590,000	305,000	1,762,195.35	464,558.46	75,888.89				3,197,643
Output 3: Corruption risk management processes institutionalized in key vulnerable sectors across region <i>Gender marker: 2</i>	3.1 Organize three ministerial conferences for ACINET in 2019, 2021 and 2023 to promote and secure high-level political commitment to SDG 16	148,000	0	250,000	0	63,000	UNDP	KOICA	Staff Travel Events	100,000 250,000 111,000
	3.2 Set up a regional center of excellence for ACINET that supports the effective integration of anti-corruption and integrity in SDG implementation strategies	0	50,000	285,000	185,000	0	UNDP	KOICA	Staff Consultants Travel Events	100,000 320,000 50,000 50,000
	3.3 Develop regional studies on the nexus between corruption and each of the following topics violent extremism, women empowerment, youth, and private sector engagement	200,000	0	0	0	0	UNDP	KOICA	Staff Consultants Travel	75,000 75,000 50,000
	3.4 Organize regional conferences to identify challenges and opportunities for tackling the nexus between corruption and the identified priority issues for the region	0	0	320,000	0	0	UNDP	KOICA	Staff Consultants Travel Events	50,000 50,000 120,000 100,000
	3.5 Support national partners to follow up on the recommendations of the regional conferences including through country specific dialogues and formulation of related actions plans	0	300,000	0	260,000	0	UNDP	KOICA	Staff Consultants Travel Events	250,000 50,000 100,000 160,000

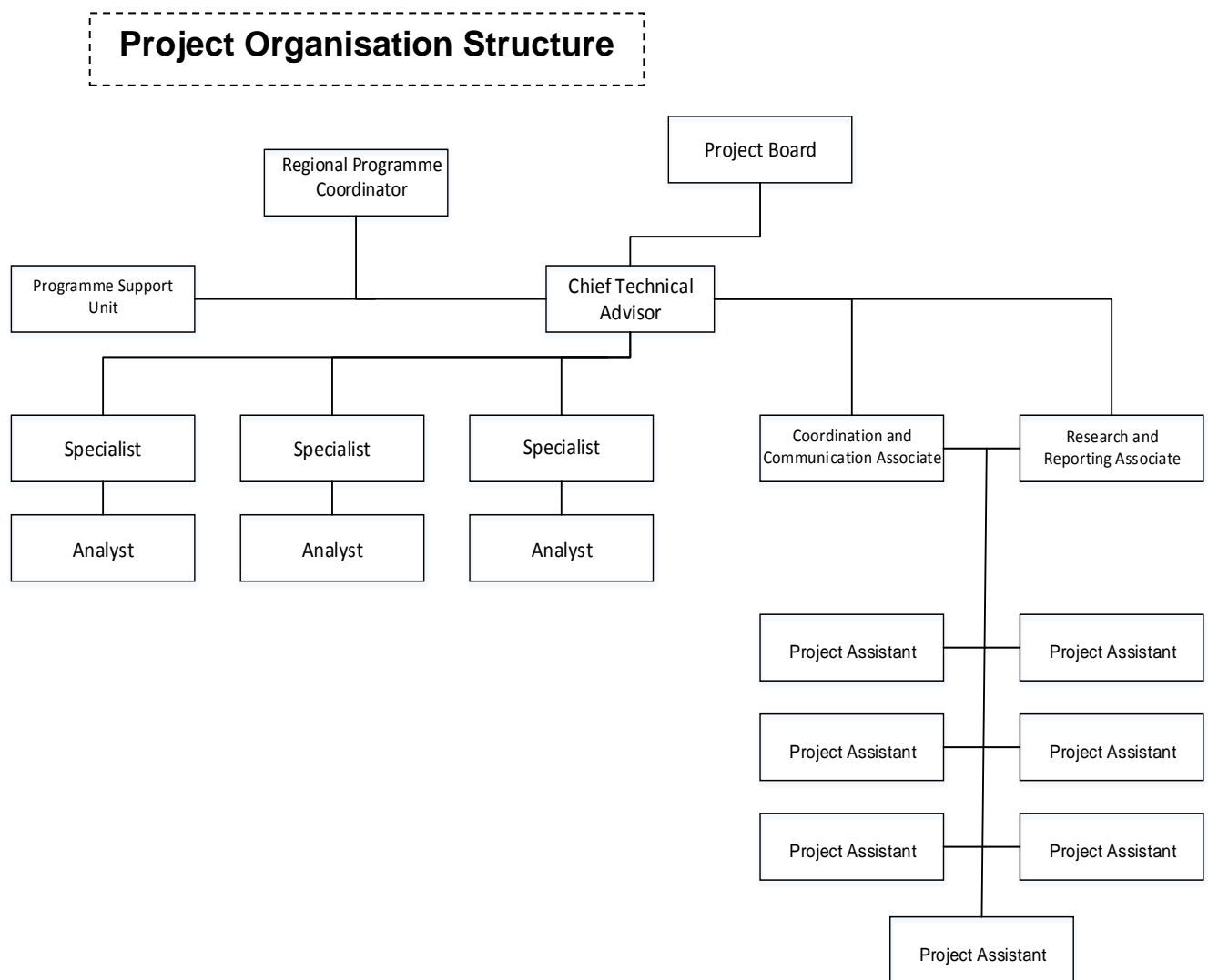
	3.6 Support ACINET's Non-Governmental Group to develop and disseminate position papers on SDG 16 issues	100,000	100,000	80,000	0	0	UNDP	KOICA	Staff Consultants Travel Events	80,000 50,000 50,000 100,000
	3.7 Establish and train a regional task force, on a gender-parity basis, under ACINET to promote corruption risk assessment of draft laws drawing on the Korean ACRC methodology	100,000	26,000	0	0	0	UNDP	KOICA	Staff Travel Events	60,000 40,000 26,000
	3.8 Establish and train a regional task force, on a gender-parity basis, under ACINET to advocate and monitor reforms for a more transparent and accountable justice system drawing on the ACINET methodology	99,605.12	28,382.72	0	0	0	UNDP	KOICA	Staff Travel Events	57,987.84 36,000 34,000
	3.9 Provide technical assistance to national partners to adapt and execute methodologies for corruption risk assessment in draft laws, as well as implementation of article 11 of the UNCAC	0	180,000	0	204,000	0	UNDP	KOICA	Staff Travel Events	100,000 84,000 100,000 100,000
	Sub-Total for Output 3	647,605.12	684,382.72	935,000	649,000	63,000				2,978,988
Total Cost of Activities		1,849,605.12	1,674,382.72	3,428,195.35	1,303,558.46	138,888.89		KOICA		8,394,630.54
DPC (2%)¹³		36,992.10	33,487.65	68,563.91	26,071.17	2,777.78		KOICA		167,892.61
GMS (8%)¹⁴		150,927.78	136,629.63	279,740.74	106,370.37	11,333.33		KOICA		685,001.85
UNRC Levy (1%)¹⁵		92,475	0	0	0	0		KOICA		92,475
TOTAL		2,130,000	1,844,500	3,776,500	1,436,000	153,000				9,340,000

¹³ Direct Project Costs (DPC), previously called Implementation Support Services (ISS) are transactional costs charged on the basis of full cost recovery in accordance with prevailing UNDP policies, and are currently set for this project at two percentage points of total cost of activities.

¹⁴ Those costs are incurred in addition to direct project costs (DPC), representing the costs to the organization that are not directly attributable to specific projects or services, but are necessary to fund the corporate structures, management and oversight costs of the organization. These costs are recovered by charging a cost recovery rate, known as General Management Support (GMS) fee, in accordance with UNDP policies, and currently set at eight percentage points of total cost of activities and direct project costs.

¹⁵ United Nations Coordination Levy on non-core tightly earmarked third-party contributions to UN development-related activities.

VII. GOVERNANCE AND MANAGEMENT ARRANGEMENTS



As illustrated in the diagram above, the programme will be executed by UNDP, with overall management of the programme by UNDPs Regional Programme Team: The policy and programme support by UNDPs Anti-corruption and integrity Team, and implementation support by UNDPs Management Support Unit, all integral parts of the UNDP Regional Hub for Arab States.

The project management structure consists of the following:

The Project Board (also called Project Steering Committee) is the main oversight mechanism for the project, involving the key partners to the programme as elaborated in the above diagram. The project Board will:

- Be responsible to provide strategic guidance with a view to secure successful implementation of project activities and/or to support the delivery as necessary;
- Be responsible for making strategic decisions, including the approval of project revisions (i.e. changes in the project document);
- Approve work plans and quarterly reports and adjustments on the basis of recommendations by the Chief Technical Advisor;
- Meet periodically, at least once annually, to review management risks and most relevant issues (meetings can be held virtually, e.g. teleconference, videoconference, and through email communications);

- Be consulted by the Chief Technical Advisor/Project Manager for decisions when management tolerance thresholds (in terms of time and budget as per work plan) have been exceeded (the Project Board defines tolerance thresholds).

The Project Board is comprised of representatives from UNDP senior management (Regional Program Coordinator and the CTA), the Korean International Cooperation Agency and of relevant national beneficiary institutions. The Board is the group responsible for making management decisions for the project for a successful completion of delivery of support. In order to ensure UNDP's ultimate accountability, the Project Board decisions should be made in accordance with standards and protocols that shall ensure management for development results, best value money, fairness, integrity, transparency and effective international competition.

A Chief Technical Advisor (CTA), appointed by UNDP, has the authority to run the project on a day-to-day basis within the authorities being defined by the Project Board. Primary responsibility of the CTA consists of ensuring that the project produces the results (outputs) specified in the project document, to the required standard of quality and within the specified scope of time and costs.

The CTA cooperates with representatives/officials of the beneficiaries at national and regional level in function of requirements of activities of the project and its outcomes. This partnership would be established taking account of relevant working mechanisms and those of the decision making in use by the beneficiaries.

Under the leadership and guidance of the Project Board and direct supervision of UNDP/RBAS Regional Programme Coordinator, the CTA is responsible for all technical aspects related to the management and implementation of the project. This includes project operations, staff, budget, preparation and consolidation of work plans, implementation of project activities and achievement of stated results, preparation of periodic reports, mid-term review and evaluation at the end of the project, and for meeting any specific requirements of the donors constituting the partnership behind the project.

The CTA will lead the implementation team, ensuring quality and coherence in the implementation of the project and the achievement of the outputs. As explained in further details in the above section *Resources Required to Achieve the Expected Results*, the team will be composed of:

- Three Specialists;
- Three Analysts;
- Coordination and Communication Associate;
- Research and Reporting Associate;
- Seven Project Assistants.

The project team and the CTA would benefit of support to be provided by the Management Unit under the Regional Programme of RBAS in terms of making logistics arrangements and administration works, including procurement and completion of contractual arrangements of recruitment of experts working for the project. They are also responsible for the compliance of administrative, financial works to rules and regulations by UNDP.

UNDP is the executing agency and implementing partner for the project. It is therefore ultimately accountable for the results and resources managed through the project.

This project will be implemented through the UNDP Direct Implementation Modality (DIM) where the UNDP regional programme assumes full substantive and financial responsibility and accountability for all project deliverables. All aspects of project implementation will comply with UNDP policies and procedures. Leadership on the management of the project will be provided by the UNDP regional program coordinator and the Director of the Regional hub.

UNDP's network of country offices will support the implementation of activities at the national level.

The responsibility and accountability of UNDP is to:

- Implement the activities agreed upon in the project document and adopted work plans, with the highest care and level of quality, to efficiently ensure the production of the expected results at the level of outputs and outcomes;
- Report, fairly and accurately, on project progress against agreed work plans in accordance with the reporting schedule and formats included in the project agreement;

- Maintain documentation and evidence that describes the proper and prudent use of project resources in conformity to the project agreement and in accordance with applicable regulations and procedures. This documentation will be available on request to project monitors (project assurance role) and designated auditors.

Specific activities under the project may be conducted in coordination and collaboration with internal and external partners, or outsourced to independent experts, UN Agencies (WHO, WCO, UNODC), non-governmental organizations (NGOs) or other partner organizations following the implementing agency contracting rules and regulations.

In addition to the above, ACIAC will use twitter and other social media platforms to keep its stakeholders informed of the project's activities and key results achieved and will utilize formal and informal channels to engage with the various stakeholders and beneficiaries as it has done in its earlier stages. It will also tap into the network of journalists and media professionals, which UNDP already has in place, to ensure a continuous flow of relevant information as deemed useful, using the concept of "risk communication". To that end, it will also endeavor to engage them on the side of major activities through "press briefings" and invite them to cover key activities. This work will be led by the regional project's Communication and Coordination Associate who will coordinate closely with the Regional Communication Advisor based at the Regional Hub for the Arab States in Amman and other communication officers at the level of the Country Offices. The details of the communication plan will be developed by October 2019 and reviewed on a regular basis to ensure efficiency and effectiveness and maximize impact.

Furthermore, ACIAC will utilize the already well-established network of focal points within the Arab Anti-Corruption and Integrity Network (ACINET), which includes all the agencies, leading ministries and civil society organizations specialized in this area of work in all the seven target countries and will make it a priority, in the first year of the project, to expand this network to include all the audit institutions in those countries as well. To further facilitate this communication and to make it a two-way channel, ACIAC will also revamp the ACINET Portal by October 2019 so that it can become an interactive interface between the regional project team and its beneficiaries who would be able to request assistance, share news, engage in online discussions and be informed about project activities using the portal (www.arabacinet.org).

In synergy with the above, ACIAC will also establish early on through official communications by its UNDP Country Offices focal points at the level of Parliaments while also engaging prominent parliamentarians through its collaborator the Beirut-based association of "Arab region Parliamentarians against Corruption" (ArPAC), which is the regional chapter of Global Organization for Parliamentarians against Corruption (GoPAC) and also a member of the ACINET Non-Governmental Group. ArPAC already has a network of such parliamentarians and local chapters and contact groups in Iraq, Jordan, Lebanon, Palestine, Morocco and Tunisia.

Project Assurance

Project Assurance is the responsibility of each Project Board member. This role will be supported by the Regional Programme Coordinator and the Regional Hub Director as well as through existing capacities available at the regional hub through the programme and policy support teams. The Project Assurance role supports the Project Board by carrying out objective and independent project oversight and monitoring functions. This role ensures appropriate project management milestones are managed and completed. The Project Board will be supported by the UNDP Anti-corruption and integrity Team at the Regional Hub through policy support, programme coordination and quality assurance functions on cost-recovery basis under the project. There are also numerous parallel UNDP regional projects on issues of trade, gender, social cohesion and other topics, with which the programme will liaise through support of UNDPs Regional Programme, ensuring coordinated and harmonized approaches.

VIII. LEGAL CONTEXT

This project will be implemented by UNDP (“Implementing Partner”) in accordance with its financial regulations, rules, practices and procedures only to the extent that they do not contravene the principles of the Financial Regulations and Rules of UNDP. Where the financial governance of an Implementing Partner does not provide the required guidance to ensure best value for money, fairness, integrity, transparency, and effective international competition, the financial governance of UNDP shall apply.

IX. RISK MANAGEMENT

1. UNDP as the Implementing Partner will comply with the policies, procedures and practices of the United Nations Security Management System (UNSMS.)
2. UNDP as the Implementing Partner will undertake all reasonable efforts to ensure that none of the [project funds]¹⁶ [UNDP funds received pursuant to the Project Document]¹⁷ are used to provide support to individuals or entities associated with terrorism and that the recipients of any amounts provided by UNDP hereunder do not appear on the list maintained by the Security Council Committee established pursuant to resolution 1267 (1999). The list can be accessed via http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml. This provision must be included in all sub-contracts or sub-agreements entered into under this Project Document.
3. Social and environmental sustainability will be enhanced through application of the UNDP Social and Environmental Standards (<http://www.undp.org/ses>) and related Accountability Mechanism (<http://www.undp.org/secu-srm>).
4. UNDP as the Implementing Partner will: (a) conduct project and programme-related activities in a manner consistent with the UNDP Social and Environmental Standards, (b) implement any management or mitigation plan prepared for the project or programme to comply with such standards, and (c) engage in a constructive and timely manner to address any concerns and complaints raised through the Accountability Mechanism. UNDP will seek to ensure that communities and other project stakeholders are informed of and have access to the Accountability Mechanism.
5. All signatories to the Project Document shall cooperate in good faith with any exercise to evaluate any programme or project-related commitments or compliance with the UNDP Social and Environmental Standards. This includes providing access to project sites, relevant personnel, information, and documentation.
6. UNDP as the Implementing Partner will ensure that the following obligations are binding on each responsible party, subcontractor and sub-recipient:
 - a. Consistent with the Article III of the SBAA [*or the Supplemental Provisions to the Project Document*], the responsibility for the safety and security of each responsible party, subcontractor and sub-recipient and its personnel and property, and of UNDP’s property in such responsible parties, subcontractor’s and

¹⁶ To be used where UNDP is the Implementing Partner

¹⁷ To be used where the UN, a UN fund/programme or a specialized agency is the Implementing Partner

sub-recipient's custody, rests with such responsible party, subcontractor and sub-recipient. To this end, each responsible party, subcontractor and sub-recipient shall:

- i. put in place an appropriate security plan and maintain the security plan, taking into account the security situation in the country where the project is being carried;
 - ii. assume all risks and liabilities related to such responsible party's, subcontractor's and sub-recipient's security, and the full implementation of the security plan.
- b. UNDP reserves the right to verify whether such a plan is in place, and to suggest modifications to the plan when necessary. Failure to maintain and implement an appropriate security plan as required hereunder shall be deemed a breach of the responsible party's, subcontractor's and sub-recipient's obligations under this Project Document.
 - c. Each responsible party, subcontractor and sub-recipient will take appropriate steps to prevent misuse of funds, fraud or corruption, by its officials, consultants, subcontractors and sub-recipients in implementing the project or programme or using the UNDP funds. It will ensure that its financial management, anti-corruption and anti-fraud policies are in place and enforced for all funding received from or through UNDP.
 - d. The requirements of the following documents, then in force at the time of signature of the Project Document, apply to each responsible party, subcontractor and sub-recipient: (a) UNDP Policy on Fraud and other Corrupt Practices and (b) UNDP Office of Audit and Investigations Investigation Guidelines. Each responsible party, subcontractor and sub-recipient agrees to the requirements of the above documents, which are an integral part of this Project Document and are available online at www.undp.org.
 - e. In the event that an investigation is required, UNDP will conduct investigations relating to any aspect of UNDP programmes and projects. Each responsible party, subcontractor and sub-recipient will provide its full cooperation, including making available personnel, relevant documentation, and granting access to its (and its consultants', subcontractors' and sub-recipients') premises, for such purposes at reasonable times and on reasonable conditions as may be required for the purpose of an investigation. Should there be a limitation in meeting this obligation, UNDP shall consult with it to find a solution.
 - f. Each responsible party, subcontractor and sub-recipient will promptly inform UNDP as the Implementing Partner in case of any incidence of inappropriate use of funds, or credible allegation of fraud or corruption with due confidentiality.

Where it becomes aware that a UNDP project or activity, in whole or in part, is the focus of investigation for alleged fraud/corruption, each responsible party, subcontractor and sub-recipient will inform the UNDP Resident Representative/Head of Office, who will promptly inform UNDP's Office of Audit and Investigations (OAI). It will provide regular updates to the head of UNDP in the country and OAI of the status of, and actions relating to, such investigation.

- g. UNDP will be entitled to a refund from the responsible party, subcontractor or sub-recipient of any funds provided that have been used inappropriately, including through fraud or corruption, or otherwise paid other than in accordance with the terms and conditions of this Project Document. Such amount may be deducted by UNDP from any payment due to the responsible party, subcontractor or sub-recipient under this or any other agreement. Recovery of such amount by UNDP shall not diminish or curtail any responsible party's, subcontractor's or sub-recipient's obligations under this Project Document.

Where such funds have not been refunded to UNDP, the responsible party, subcontractor or sub-recipient agrees that donors to UNDP (including the Government) whose funding is the source, in whole or in part, of the funds for the activities under this Project Document, may seek recourse to such responsible party, subcontractor or sub-recipient for the recovery of any funds determined by UNDP to have been used inappropriately, including through fraud or corruption, or otherwise paid other than in accordance with the terms and conditions of the Project Document.

Note: The term “Project Document” as used in this clause shall be deemed to include any relevant subsidiary agreement further to the Project Document, including those with responsible parties, subcontractors and sub-recipients.

- h. Each contract issued by the responsible party, subcontractor or sub-recipient in connection with this Project Document shall include a provision representing that no fees, gratuities, rebates, gifts, commissions or other payments, other than those shown in the proposal, have been given, received, or promised in connection with the selection process or in contract execution, and that the recipient of funds from it shall cooperate with any and all investigations and post-payment audits.
- i. Should UNDP refer to the relevant national authorities for appropriate legal action any alleged wrongdoing relating to the project or programme, the Government will ensure that the relevant national authorities shall actively investigate the same and take appropriate legal action against all individuals found to have participated in the wrongdoing, recover and return any recovered funds to UNDP.
- j. Each responsible party, subcontractor and sub-recipient shall ensure that all of its obligations set forth under this section entitled “Risk Management” are passed on to its subcontractors and sub-recipients and that all the clauses under this section entitled “Risk Management Standard Clauses” are adequately reflected, *mutatis mutandis*, in all its sub-contracts or sub-agreements entered into further to this Project Document.

X. ANNEXES

- 1. Project Quality Assurance Report**
- 2. Social and Environmental Screening Template**
- 3. Risk Analysis**
- 4. Project Board Terms of Reference and TORs of key management positions**

ANNEX I. PROJECT QUALITY ASSURANCE REPORT

<https://intranet-apps.undp.org/ProjectQA/>

ANNEX III. RISK ANALYSIS

#	Description	Date Identified	Type	Impact & Probability	Countermeasures / Mngt response	Owner	Submitted, updated by	Last Update	Status
1	Political instability/conflict	Formulation stage	Organizational Strategic	C=4 L= 3 This may vary depending on the country	<ul style="list-style-type: none"> Continuous monitoring of the political situation (e.g. Arab unrest index of EIU). Limit of in-country activities in case of security threats 	UNDP Regional Programme	UNDP Regional Programme	Start of project	Being monitored
2	Insufficient political commitment from beneficiary countries to adopt reform measures and legal instruments for the implementation of the UNCAC and adoption of risk-management approach at the sectoral level	Formulation stage	Political	C= 3 L= 2 Recommendations identified are not implemented nor operationalized by responsible government institutions.	<ul style="list-style-type: none"> Early involvement of key beneficiary countries into the design and planning of activities. Consensus and capacity building activities. Bottom up / participatory approach. Regular consultations and reviews of feedbacks received from countries and beneficiaries. 	UNDP Regional Programme	UNDP Regional Programme	Start of project	Being monitored

3	Unfavorable operational circumstances or climate	Formulation stage	Organizational Strategic	C=3 L=2	<ul style="list-style-type: none"> • Introduction of more support to institutional arrangements and policy making decisions. • Strengthening the consultations with beneficiary countries. 	UNDP Regional Programme	UNDP Regional Programme	Start of project	Being monitored
4	Availability of competent national consultants or specialized experts.	Formulation stage	Operational	C= 2 L= 2 Additional expenditures due to the need to hire international consultants.	<ul style="list-style-type: none"> • Collaboration with academic institutions and networks of human resources of UN Agencies. • Coaching and reinforcing the technical capacity of local experts. 	UNDP Regional Programme	UNDP Regional Programme	Start of project	Being monitored
5	Duplication with other initiatives	Formulation stage	Operational	C = 1	<ul style="list-style-type: none"> • Care will be taken to provide support and cooperation with domestic and international initiatives. Strengthened collaboration with UN agencies and international organizations in specific interventions for more synchronization and complementarity 	UNDP Regional Programme	UNDP Regional Programme	Start of project	Being monitored