



PROJECT DOCUMENT

Project Title: Anti-Corruption for Trust in Lebanon

Start Date: June 1, 2020

End Date: June 30, 2025

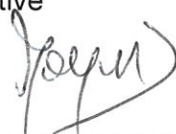
Project ID: 00122350

PAC Meeting: Refer to minutes of meetings with counterparts

Gender Marker: GEN2

Total resources required:		10,577,597 USD
Total resources allocated	Donor-:	UNDP: 844,531 USD EU: 4,749,200 USD Denmark: 3,740,000 USD
Net Programmable		9,742,537 USD
GMS (8%)		694,111 USD
Levy (1%)		49,345 USD
DPC¹		91,604 USD

Agreed by (signatures):

UNDP	
UNDP Resident Representative	
Name: Ms. Celine Moyroud	
Date:	14/02/2022

¹Indirect cost: It reflects the General Management Services, as well as Levy and Direct Project Cost (DPC) and is applied according to the respective donor agreements, i.e. 7% GMS for EC and 8% for other donors.



I. DEVELOPMENT CHALLENGE

Corruption is a **systemic challenge** for Lebanon and a major obstacle to the achievement of the 2030 Global Agenda for Sustainable Development. It is fostered and driven by a complex set of factors, including confessionalism, vulnerability to geopolitics, inadequate checks and balances at the level of the three branches of Government, structural deficits in fiscal and tax policies, as well as inefficiencies in the economic model. Those factors manifest themselves in, and are exacerbated by, a poor governance system that is characterized by inefficiencies in the public administration, outdated and ineffective institutional arrangements for controls and audit, limited police and judicial capacities to uphold the rule of law, and the absence of key laws that are needed to effectively prevent and combat corruption.

The severity of the corruption challenge and existing gaps in related reform efforts are **highlighted across related international indicators**. On the 2020 “Corruption Perception Index”, which is issued by Transparency International, ranking countries based on a scale ranging from 100 (very clean) to 0 (highly corrupt), Lebanon scored 25 over 100 compared to a regional average of 39 and a global average of 43. On the “Institutions” indicator, which is part of the 2019 Global Competitiveness Report by the World Economic Forum, the country scored 44.4 compared to a regional average of 45.25 compared and a global average of 55.07 points. On the 2020 “E-Participation Index”, which is part of the United Nations’ E-government survey, assessing countries on a scale from 0 to 1, Lebanon scored 0.33 compared to a regional average of 0.66 and a global average of 0.56. Similarly, on the “E-Government Index”, which is part of the same survey, Lebanon scored 0.49 compared to a regional average of 0.68 and a global average of 0.59. On the 2019 the Worldwide Governance Indicators (WGIs), which comprises six datasets on a scale ranging from -2.5 (worst) to +2.5 (best), Lebanon scored -1.16 on “Control of Corruption” and -0.86 on “Rule of Law”, well beyond the regional and global averages.

The **development and swift implementation of key anti-corruption reforms** has become necessary and critical for Lebanon. This is acknowledged by the Government, which was established under extraordinary economic and fiscal pressures and following unprecedented waves of social upheaval since 17 October 2019. This is also included by the “Lebanese Government’s Reform Programme” that was announced in April 2020 and is a top priority for the general public as well as for the international development community in relation to the CEDRE commitments.

The devastating explosion at the Beirut port on 4 August 2020 and its aftermath further uncovered serious transparency and accountability gaps and reaffirmed the importance of embarking on deep governance reforms, with anti-corruption being front and centre. This was highlighted in the **Reform, Recovery and Reconstruction Framework (3RF)**, which was developed in 2020, following the Beirut explosion, by the World Bank Group, the United Nations, and the European Union in cooperation with civil society, the government of Lebanon, and the international community. Without such reforms, the effectiveness of related recovery and reconstruction efforts will be at serious risk, the impact of which is compounded by the socio-economic dimensions of the COVID-19 pandemic and the escalating economic crisis that country has been facing since late 2019.

The much needed anti-corruption reforms would **draw on international standards and the cumulative efforts deployed by various stakeholders in recent years**, most notably in the framework of the Ministerial Anti-Corruption Committee (MACCom) and its supporting Technical Committee (TACCom) that were formally established in 2011 and revised in 2020, and that are respectively led by the Prime Minister and the Minister of State for Administrative Reform (OMSAR). It will also link to the 3RF and the priorities that has been set in this regard, ensuring that related reforms are closely linked to the recovery and reconstruction needs of Lebanon.

The country's first-ever national anti-corruption strategy, which was adopted by the Council of Ministers in May 2020, provides a solid and detailed vision for moving forward. Future reform efforts would also benefit from building on the achievements made and lessons learned in the context of related initiatives including in Parliament, the judiciary, civil society and the business community. This includes, among other things, the key anti-corruption legislative reforms that were adopted in recent years on access to information (2017), whistle-blower protection (2018) and its amendment (2020), the establishment of national anti-corruption institution (2020), asset and interest declaration and anti-illicit enrichment (2020), and asset recovery (2021), and ongoing efforts to tackle gaps in laws and regulations and the implementation thereof.

II. STRATEGY

The **overall objective of this project is to enable the adoption and measurable progress in the implementation of an integrated and targeted approach to preventing and combating corruption** that is in line with the National Anti-Corruption Strategy (NACS), Lebanon's commitments under the UN Convention against Corruption (UNCAC), to which Lebanon is a State Party since 2009, the priorities set under the Reform, Recovery and Reconstruction Framework (3RF) for Lebanon; and more broadly agenda 2030 and its 17 Sustainable Development Goals (SDGs), particularly SDG 16 on "Peace, Justice and Strong Institutions".

Stakeholders that are expected to be primarily engaged by this project are OMSAR, the Ministry of Justice, the Higher Judicial Council, Parliament, the Lebanese Parliamentarians against Corruption, as well as the National Anti-Corruption Institution once operationalized. In addition, this project will proactively seek to engage civil society and concerned non-governmental organizations networks, including youth and women groups and organizations, as well as individual experts.

Among other things, this will be achieved through supporting the establishment of implementation groups, or task forces, under the auspices of the TACCom to inform and follow up thematic work that requires intensive multi-stakeholder collaboration.

This project's overall objective will be achieved through a series of inter-connected activities that are designed to support the national stakeholders in achieving the four targeted outputs, based on the orientations decided and provided by the MACCom and the TACCom in accordance with the National Anti-Corruption Strategy.

Output 1: Capacity to oversee and monitor national anti-corruption strategy institutionalized and supported

Under this output, activities will aim to strengthen formal processes responsible for the promotion and implementation of the overall anti-corruption agenda in Lebanon in line with NACS seven outcome areas (specialized legislation, civil service, public procurement, justice system, audit and control system, society engagement, and sector-specific initiatives), its inter-linkages with economic reforms and related structural reforms. This includes the development of strategic, policy and technical capacities to support its implementation, monitoring and reporting against agreed milestones; making the process transparent, accountable and participatory; and enhancing related communication with society and international partners.

More specifically, the output will be achieved by six types of activities: the provision of advisory support to the leadership of the MACCom and the TACCom to carry out their respective mandates as per the official decisions establishing them; the provision of technical assistance to the two committees to plan and report on their meetings; training and advising of governmental and non-governmental stakeholders on strategic planning, monitoring and evaluation, and the substantive areas of the NACS, while building broader public knowledge on related topics, including but not limited to university curricula and online user-friendly electronic courses²; formulation of the annual work plans for NACS implementation and related M&E frameworks including the development of related tools to collect, analyse, utilize and share information on related progress and challenges; the development and dissemination of regular public reporting on the NACS; and the setting up and supporting of an economic media planning to inform, advocate for, monitor, and communicate on the implementation of the NACS, through articles, interviews, audio-visual materials and different types of events and fora.

In addition to enhancing the knowledge and skills of more than 120 stakeholders, including policymakers, government officials, judges, and civil society and media professionals and institutions, with emphasis on achieving gender parity and engaging youth in this regard, the project is also expected to provide the primary support and needed technical assistance for the government to ensure the proper implementation and monitoring of the NACS. This is included but not limited to the development of work plans in a participatory manner and their adoption, as well as the development of progress reports on implementation and their publication.

Output 2: Specialized anti-corruption legislations enacted and supported for effective implementation

Under this output, activities will aim to increase compliance of Lebanese legislations with the UNCAC requirements and bridge gaps in their implementation on the ground through dedicated support to the national legislative agenda and associated actions aimed at activating those laws in practice. This includes the development of legislative, regulatory, judicial and executive capacities, while also supporting the engagement of society in formulating and monitoring related reform measures, with priority given to asset and interest declaration, conflict of interest management,

whistle-blower protection, access to information, asset recovery, and criminal and administrative investigation procedures.

More specifically, the output will be achieved by six types of activities: the provision of policy advice and legislative drafting assistance to parliamentary committees and groups responsible for developing and overseeing implementation of anti-corruption bills; supporting participatory development of action plans for the implementation of anti-corruption bills enacted by parliament; the provision of policy advice and regulatory drafting assistance to PMO, the Ministry of Justice and other entities responsible for developing and overseeing execution decrees of selected anti-corruption bills; training and advising of governmental and non-governmental stakeholders on the development and implementation of legislative & regulatory measures under UNCAC, and its implementation review mechanism; implementation of other selected solutions proposed under the action plans developed including the development of partnerships with specialized civil society organizations to exercise social accountability and complement the efforts of national institutions as necessary; and the organization of national dialogues, accompanied by advocacy campaigns, to regularly identify and address challenges and opportunities for UNCAC implementation.

In addition to enhancing the knowledge and skills of more than 240 stakeholders, including policymakers, government officials, judges, and representatives from civil society, professional associations and syndicates, media professionals and institutions, and the business community, with emphasis on achieving gender parity and engaging youth in this regard, the project is also expected to enable Lebanon's compliance with UNCAC provisions and the introduction of specific instruments for the implementation of anti-corruption bills adopted, including execution decrees, training guides, and information and communication technology tools.

Output 3: National Anti-Corruption Institution (NACI) operationalized and strengthened

Under this output, activities will aim to help the newly established NACI to gain the trust of the public, the business community and international development partners, through guided access to global experiences and agile day-to-day support to its board and administrative body to assess and enhance related capacities using specialized UNDP methodologies that have been successfully tested and proven across many countries on awareness-raising, prevention and investigation. This includes strategic guidance, technical trainings, organizational development and partnership building with governmental and non-governmental entities as well as at the local, national, regional and international levels.

More specifically, the output will be achieved by six types of activities: the provision of advisory support to the leadership of NACI; the assessment of the capacity of NACI and key related cooperating oversight, financial and justice entities; designing and regularly updating of capacity development plan for NACI and key related cooperating oversight and justice entities; advising NACI board members and training and mentoring its staff on the implementation and monitoring of the NACS, the UNCAC and SDG 16; training and mentoring of NACI staff on its investigative role together with other entities that have relevant police and judicial functions; and implementation of other selected solutions proposed under the NACI capacity

development plan including, but not limited to, legal, management technological and public outreach capacities. .

In addition to enhancing the knowledge and skills of more than 100 stakeholders, including policymakers, NACI officials, government officials and judges, and civil society and media professionals and institutions with emphasis on achieving gender parity and engaging youth in this regard, the project is also expected to enable the development of NACI's capacities in accordance with a clear and measurable plan, while strengthening its performance so as to promote positive public perception thereof compared to other comparable state institutions.

Finally, and in view of enhancing the project's support to NACI, UNDP will endeavour to review the project with a view to mobilizing and investing additional resources to strengthen it. This would be based on the findings of the capacity assessment conducted. UNDP will also work with OMSAR to facilitate the convening of, and coordination among, the different international development partners prepared to contribute to the operationalization and strengthening of NACI, including through technical assistance and/or direct budget support. Among other things, this will be dependent on the swift and transparent appointment of NACI members.

Output 4: Corruption risk management mechanisms integrated in key vulnerable sectors

Under this output, activities will aim to expand the anti-corruption agenda and adapt it to the particularities of specific sectors that are critical for Lebanon's sustainable development, including service delivery and revenue generation (e.g. health, customs, police, water, energy, environment, telecommunication, labour, municipalities etc.). This includes the development and deployment of specialized tools for managing the risks of corruption at sectoral level using specialized UNDP methodologies. It also includes small grants to non-governmental actors and technical assistance to champion sectoral authorities to test innovative solutions that reduce corruption risks for sectoral effectiveness and draw lessons learned, all based on participatory assessments that maximizes inputs from concerned stakeholders.

More specifically, the output will be achieved by six types of activities: the organization of policy dialogues on corruption prevention at sectoral level and comparative experiences; support for establishing and training of inclusive sectoral task forces in selected sectors; the provision of technical assistance for developing plans for managing risk of corruption in key selected sectors; the promotion of coalition-building to monitor and advocate for integrity in selected sectors; support for the implementation of other selected solutions proposed under the sectoral plans developed for managing corruption risks including but not limited to regulatory reforms, administrative simplification, automation, specialized trainings and social accountability measures; and the documentation and dissemination of impact achieved by sectoral anti-corruption reforms.

In addition to enhancing the knowledge and skills of more than 400 stakeholders, including policymakers, government officials and representatives from civil society and the business community, professional associations and syndicates, media professionals and institutions, and with emphasis on achieving gender parity and engaging youth in this regard, the project is also expected to enable at least five

sectors to develop corruption risk assessments and mitigation plans and successfully introduce mitigation actions in each.

Furthermore, the project will promote **four cross-cutting themes**, as part and parcel of the activities envisioned under the four outputs described above (national anti-corruption strategy; specialized anti-corruption legislations; national anti-corruption institution; and corruption risk management in key vulnerable sectors). The four cross-cutting themes are **public participation** (open and sustained engagement of the public and key stakeholders from civil society, the business community, universities, and professional syndicates in key project activities); **gender equality** (equal participation of women in project activities, and integration of a gender lens in the analyses conducted and the proposed policies, plans, and legal reforms at the national and local levels as cross-sectoral and sectoral levels); **youth engagement** (proactive engagement of Lebanese youths to strengthen their capacities as advocates and watchdogs for anti-corruption); and **human rights** (promotion of synergies between NACI and the National Human Rights Institution, and emphasis on right to information, due process, and the nexus between sectoral interventions and the rights to health, education, and other development rights).

Rolling out the implementation of this project, in the framework of the four outputs and the four cross-cutting themes defined above, will prioritize support to five main tracks of action that will be defined by five implementation groups, formed by the OMSAR Minister under the auspices of the TACCom, which will be responsible for validating and adopting the proposed actions. Those are (a) reviewing and reporting on compliance with UNCAC and the quality and implementation of related laws in Lebanon (Project Output 1); (b) enhancing compliance with the 2017 access to information law (Project Output 2); (c) activating the 2018 whistle-blower protection law (Project Output 2); (d) setting up the National Anti-Corruption Institution (Project Output 3); Additional task teams will be established based on the emerging priorities and updates, and in consultation with project partners as suitable, mainly on engaging with Lebanese youth; criminalization of illicit enrichment and the asset and interest declaration system, and other key priorities.

III. RESULTS AND PARTNERSHIPS

Resources Required to Achieve the Expected Results

To ensure effectiveness of programme delivery, a dedicated project team 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 positions to match the stated outputs in the project while maintaining UNDP's quality assurance standards, subject to possible changes as needed to accompany the evolution of national needs and priorities in relation to the NACS. An annual monitoring and evaluation plan, including risks and mitigating measures, will be developed based on the annual work plan designed by the project and the UNDP quality assurance team. The project is part of the overall country programme quality assurance structures, which include a solid results-based monitoring system and data collection and monitoring capacity. In addition, and based on specific punctual needs, Individual Consultants will be commissioned by the project to fulfil and compliment specific capacity gaps, including but not limited to high level advisory, and on specific areas of intervention such as specific sectors, legal review, and media and communication.

Partnerships and Stakeholders Engagement

To properly implement all four objectives, the project will greatly rely on establishing strong national, regional, and international partnerships, and establish a framework for a consultative process in all of the initiatives it will undertake and with all of the concerned stakeholders through (sometimes cross-cutting) multiple forums and platforms.

Stakeholders that are expected to be primarily engaged by this project are OMSAR, the Ministry of Justice, the Higher Judicial Council, the Parliament, the Lebanese Parliamentarians against Corruption, as well as the National Anti-Corruption Institution once established. The project will also provide technical and advisory support and engage with the Ministerial and Technical Committees and their respective leaderships. In addition, the project will also be coordinating with relevant line ministries for the support to be provided under output 4.

In parallel, the project will engage with and proactively seek the partnerships with civil society and concerned non-governmental organizations networks, including youth and women groups and organizations, as well as individual experts, the private sector, media professionals and institutions. Furthermore, the project will participate in and contribute to coordination efforts at the level of the international community, including in the context of the Reform, Recovery and Reconstruction Framework (3RF) which was developed by the World Bank Group, the United Nations, and the European Union in cooperation with civil society, the Government of Lebanon, and the international community.

Risks and Assumptions

For an overview of key risks, please refer to the risk analysis table (annex 1). The primary risks identified in this process include: (a) political instability and further degradation of the socio-economic situation which may impact the pathways highlighted in the results framework; (b) lack of collaboration among key stakeholders; and (c) capacity gaps among key stakeholders that are engaged in the process. Targeted risk mitigation strategies have been designed for the above risks and will be reviewed on a regular basis.

South-South and Triangular Cooperation

The suggested project will benefit from all available regional and global practices, and platforms and networks, to be able to learn from existing experiences, and exchange lessons learned. When applicable, UNDP will leverage partnerships with countries in the Arab States region, as well as globally, to facilitate South-South and Triangular Cooperation. UNDP's regional initiative on Anti-Corruption and Integrity in the Arab Countries will serve as a key entry point in this respect.

Knowledge

The project will reach its objectives through different approaches including institutional and capacity building, advocacy, legal reform, risk assessment, partnership development and stakeholders' engagement. To successfully do so, the project will rely on the development and publication, and dissemination of documents aiming at disseminating knowledge, building-up buy-in and enhancing capacities, including training guides and manuals, assessments, and progress and status reports.

Sustainability and Scaling Up

The project, which is the continuation of several years of technical and advisory support from UNDP to the Government of Lebanon, will culminate through support to the institutionalization of the anti-corruption machinery in Lebanon, while using as a reference guide the National Anti-Corruption Strategy. As such, the project will accompany the anti-corruption institution and the ministries and institutions addressing sectors vulnerable to corruption. In addition, it will contribute to enhancing the knowledge and skills of all stakeholders it engages with, including policymakers, government officials and representatives from civil society and the business community, building up their ownership in the process. Finally, by addressing legal reform to align with Lebanon's UNCAC commitments, the project is tackling the apparatus required to sustain the set results.

Communication and Visibility:

UNDP will develop a Communication and Visibility Plan to communicate and provide visibility to the project and its supporters, including the European Union as the primary partner to UNDP on this project alongside other potential donors contributing to this action. The plan would target a diverse range of groups within Lebanon, including direct project beneficiaries and the broader public, as well as the international community. Among other things, the plan will highlight the added value of the EU/UNDP partnership towards advancing the anti-corruption reform agenda in line with Lebanon's international commitments and the priorities established under the 3RF. It will also communicate the positive achievements of the project, focusing on the outputs and the impact of the results achieved among the target audiences.

IV. PROJECT MANAGEMENT

Cost Efficiency and Effectiveness

Through the adopted strategy, the project seeks to achieve the results outlined in the Results Framework with the available resources. The funds allocated to the project are disbursed and monitored according to the requirements of UNDP. The project will benefit from UNDP's expertise in anti-corruption at the global, regional and local levels, stand-by partnerships and networks that have been developed over time in the Arab States region and in Lebanon specifically. In addition, all services shall be provided in accordance with UNDP procedures, rules and regulations.

Implementation of some activities will be through a sub-contracting modality, which will be undertaken using standard procurement requirements for transparency and best value. Costs incurred by UNDP Country Office for providing the above described support services will be partly recovered from the cost sharing project budget.

In accordance with the decisions and directives of UNDP's Executive Board reflected in its policy on cost recovery, it is proposed that the project shall be subject to cost recovery by UNDP for two distinct cost categories related to the provision of support services, namely UNDP General Management Support (GMS).

GMS is recovered with a flat rate as per agreement for contribution from donors. GMS cover the following services:

- Project identification, formulation, and appraisal
- Determination of execution modality and local capacity assessment
- Briefing and de-briefing of project staff and consultants
- General oversight and monitoring, including participation in project reviews
- Receipt, allocation and reporting to the donor of financial resources

- Thematic and technical backstopping through Bureaus
- Systems, IT infrastructure, branding, knowledge transfer.

UNDP direct costs are unequivocally linked to the specific project, are built into the project budget against a relevant budget line and, in case of clearly identifiable transactional services, charged to the project according to standard services rates. They include the following services:

- Payments, disbursements and other financial transactions
- Recruitment of staff, project personnel, and consultants
- Procurement of services and equipment, including disposal
- Organization of training activities, conferences, and workshops, including fellowships
- Travel authorization, visa requests, ticketing, and travel arrangements
- Shipment, custom clearance, vehicle registration, and accreditation.

Project Management and Office cost:

To achieve the main results of the project, a core technical team has been designated to provide comprehensive management and in-house substantive expertise for project implementation. The team will be composed of:

Chief Technical Advisor (CTA), who will be leading the project team and responsible for providing overall strategic leadership and guidance to the project implementation. S/he will provide policy and technical advice on anti-corruption and quality control on substantive delivery of the project. S/he will support building partnerships with bodies and institutions at national, regional and international levels tasked with the prevention and combatting of corruption. S/he will guide the Project Manager to provide overall project advisory services, support and advice for the preparation or revision of key planning, monitoring and evaluation documents.

Project Manager/Management Specialist, who will be guided by the CTA to plan and execute day to day management of project activities. S/he will also support the CTA on formulating strategic directions and substantive advice related to project implementation; facilitate support services from the UNDP Country Office; and prepare the information needed for the mandatory reports on project progress and achievements, and financial management; and for early flagging of events and changes in the environment, which can affect project implementation and delivery and for providing suggestions for problem solving. S/he will also organize and coordinate the project team and guide the day-to-day distribution and execution of tasks under the project.

Technical Officer: S/he will conduct research and present information and analysis on governance and anti-corruption policies and programs in Lebanon and related reform efforts including but not limited to legislative and executive actions. S/he will draft and review technical and concept notes, policy reports, background papers, and other written outputs as requested, as well as reviewing, editing and translating technical content necessary for successful project implementation. S/he will undertake and coordinate all technical aspects, as applicable, for the successful organization of project activities in an efficient and effective manner.

Two Coordination Officers: S/he will coordinate and support all phases of implementation of project activities/initiatives in an efficient and effective manner. This includes the development of related material such as checklists, calendars of events, invitations, lists of invitees and participants, background notes, event programmes and reports. S/he will

maintain up-to-date contact records for all project beneficiaries, partners, consultants, and others participants.

Finance and Administrative Assistant: S/he will provide support to the management in all financial aspects of the project, in addition to administrative and logistics support. S/he will support in developing budgets and tracking expenditure and producing financial reports, S/he will also assist in the procurement processes and in the preparation of related documents.

Ad-hoc expertise will be recruited as needed in agreement with the concerned national counterparts and in accordance with UNDP's policies and procedures, to accomplish punctual tasks and services. It will include, but not limited to:

Senior Legal Consultant: S/he will be conducting policy and legal analysis, in addition to providing technical assistance to the drafting of anti-corruption laws and regulations. S/he will also support in developing capacities of anti-corruption stakeholders including civil society, youth and women groups through the preparation of related modules and material, and the provision of related guidance, mentoring, and training. Finally, S/he will provide strategic advice to support planning, implementation, and monitoring in relation to the National Anti-Corruption Strategy and related national frameworks including the ministerial and technical anti-corruption committees and ensuing task teams.

Senior Governance Consultant: S/he will be conducting research and providing analysis of the regulatory framework and governance structure of public administration in identified sectors. S/he will be providing technical assistance to the drafting of related corruption risk assessments and management plans while engaging with stakeholders to validate findings. S/he will also ensure that the mitigation measures are sought out in synergy with the ongoing governance reforms programs at the selected sectors.

The team, through the Chief Technical Advisor, will be reporting to the Project's Board, as well as to the UNDP Project Assurance Team (ref. to Governance and Management Arrangements), as it works under the guidance and direct supervision of the Governance Programme Manager. It will also work in close coordination with UNDP's Regional Anti-Corruption Programme, who will be providing technical advice.

In addition to the core technical team who will be providing in-house substantive expertise for project implementation, and due to the volume of operations foreseen to deliver this project, a support team is required to ensure efficient, transparent, compliant and effective project implementation. The support personnel will be contributing between 5% and 10% depending on staff role and time dedicated to implementation of the project activities. The project support team includes, but is not limited to, the following functions: Programmes functions, communication, procurement and human resources. The segregation of duties will ensure checks and balances as per UNDP Policies and Procedures. Cost of travel and subsistence costs for staff and other persons directly assigned to the operations of the project office will be included.

Office operational costs are required for the proper functioning of the Project. It includes office rent costs, depreciation costs, rental costs or lease of equipment and assets composing the project office; costs of maintenance and repair contracts specifically awarded for the operations of the project office; costs of consumables and supplies specifically purchased for the operations of the project office; costs of IT and telecommunication services, equipment and furniture specifically purchased for the operations of the project office; costs of energy and water specifically supplied for the operations of the project office; costs of facility management contracts including security fees and insurance costs specifically awarded for the operations of the project office.

Other costs include:

- Mid and final evaluation conducted by an external evaluator or firm.
- Visibility actions including footage of key activities and regular interviews with selected partners and beneficiaries, production of explanatory video about the project and its key components, production of year in review videos, posters and promotional materials as well as media sensitisation and social media broadcasting campaigns.

In addition, UNDP's regular monitoring will take place through corporate reporting requirements quarterly -internal- and annual reports). The purpose is to capture progress compared to the work plan and troubleshoot and manage risks.

V. RESULTS FRAMEWORK

Intended Outcome as stated in the Country Programme Results and Resource Framework: Outcome 2. Government's ability to improve the performance of institutions and promote participation and accountability Increased

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

Outcome indicator: No. of policy reforms legislated, and implementation plans adopted; **Baseline:** 3 (Administrative Reform Strategy adopted by Office of the State for Administrative Reform in 2012, small and medium enterprise strategy developed in 2014, Statistical Master plan developed (2015); **Target:** 15 (incl. 5 for justice reform).

output: Output 2.3. Government institutions core state functions and capacities strengthened for accountability and enhanced policy formulation and reform

Output indicators:

Indicator 2.3.1. No. of draft laws relevant to administrative and fiscal reforms prepared and submitted to parliament

Baseline: 38

Target: 150

Indicator 2.3.2. No. of approved administrative reform initiatives implemented

Baseline: 0

Target: 5

Indicator 2.3.3. No. of draft justice reforms laws prepared and submitted to parliament

Baseline: 0

Target: 5

Indicator 2.3.4. Completion of Sustainable Development Goal progress report

Baseline: 0

Target: 2

Project title and Atlas Project Number: Anti-Corruption for Trust in Lebanon (ACT Lebanon); 00122350

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EXPECTED OUTPUTS	OUTPUT INDICATORS	DATA SOURCE	BASELINE		TARGETS (by frequency of data collection)							DATA COLLECTION	
			Value	Year	Year 1	Year 2	Year 3	Year 4	Year 5	FINAL			
Output 1 Capacity to oversee and monitor national anti-corruption strategy institutionalized and supported	1.1 Percentage of stakeholders (disaggregated by type and gender) with knowledge and skills enhanced as a result of related capacity development support	Project Reports	0	2020	75%	75%	75%	75%	75%	75%	75%	75%	Project staff
	1.2 Number of works plans for strategy implementation developed in a participatory manner and adopted	Gov.	0	2020	0	7	7	7	7	7	28	28	Project staff
	1.3 Number of progress reports on strategy implementation developed and published online	Gov.	0	2020	1	2	2	2	2	2	9	9	Project staff
Output 2 Specialized anti-corruption legislations enacted and supported for effective implementation	2.1 Percentage of stakeholders (disaggregated by type and gender) with knowledge and skills enhanced as a result of related capacity development support	Project Reports	0	2020	75%	75%	75%	75%	75%	75%	75%	75%	Project staff
	2.2 Level of progress achieved in terms of UNCAC compliance (Good / Average / Poor)	UNCAC Reports	0	2020	Good	Good	Good	Good	Good	Good	Good	Good	Project staff
	2.3 Number of execution instruments (decrees, guides, websites etc) developed and deployed with project support	Gov.	0	2020	3	4	3	3	3	3	16	16	Project staff

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VI. MONITORING AND EVALUATION

In accordance with UNDP's programming policies and procedures, the project will be monitored through the following plan:

Monitoring Plan

Monitoring Activity	Purpose	Frequency	Expected Action	Partners (if joint)	Cost (if any)
Track results progress	Progress data against the results indicators in the RRF will be collected and analysed to assess the progress of the project in achieving the agreed outputs. 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.	Quarterly and Annually	Quarterly (internal) reports will be submitted to the project assurance, and annual reports to the Project Board. Results will be reflected on corporate tools. Relevant lessons are captured by the project team and used to inform project board decisions. Lessons learned are reflected on corporate tools and shared with relevant stakeholders/partners and any other parties to encourage south-south/triangular cooperation. Slower than expected progress will be addressed by the project board.	Project Board	
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.	Quarterly and Annually	Risks are identified by project management and actions are taken to manage risk. The risk log is actively maintained by UNDP to keep track of identified risks and actions taken.		

VII. MULTI-YEAR WORK PLAN

EXPECTED OUTPUTS	PLANNED ACTIVITIES	PLANNED BUDGET BY YEAR					RESP. PARTY	Budget description	Amount
		Year 1 June 20- July 21	Year 2 Aug 21- July 22	Year 3 Aug 22- July 23	Year 4 Aug 23- July 24	Year 5 Aug 24-June 25			
Budget Heading 1: Project is efficiently managed, staffed and operated, and is implemented with clear visibility actions	Provide comprehensive management and in-house substantive expertise for project implementation	0	200,000	300,000	300,000	250,000	UNDP	Chief Technical Advisor (CTA)/ P5-PEG1 (100%)	1,050,000
		124,705	114,553	114,553	114,553	95,460		Project Manager/Management specialist/ SC 11-PEG2 (100%)	563,825
		49,964	66,619	66,619	66,619	55,510		Project Technical Officer (100%)/SC9-PEG3	305,330
		49,964	66,619	66,619	66,619	55,510		Project Coordination Officer (100%)/SC9-PEG3	305,330
		0	44,408	66,619	66,619	55,510		Project Coordination Officer (100%)/SC9-PEG3	233,155
		0	32,067	42,763	42,763	35,630		Administrative and Financial Assistant (100%)/SC6-PEG2	153,223
		0	12,568	12,568	12,568	10,470		Program Officer (10%)	48,175
		0	5,326	5,327	5,327	4,440		HR Officer (5%)	20,420
		0	1,562	1,562	1,562	1,300		Procurement Assistant (5%)	5,985
		0	3,331	3,331	3,331	2,780		Communication Officer (5%)	12,773
		0	15,000	15,000	15,000	15,000		Travel (per diems for missions/travel)	60,000
		0	7,000	7,000	7,000	5,500		Consultant (Interns)	26,500
		5,957	35,000	15,890	15,890	13,241		Rent and maintenance; Information Technology and equipment; supplies; furniture	85,978
		0		15,000		30,000		Mid and final project external evaluation cost	45,000
		0		22,750	23,750	23,750		Audio Visual&Printing Production Costs	94,000

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Budget Heading 2: Output 1 Capacity to oversee and monitor national anti-corruption strategy institutionalized and supported	general public on project results and related progress	0	15,000	17,500	17,500	15,000	Experts	65,000	
		0	12,500	12,500	12,500	12,500	Other media costs	50,000	
		0	4,000	4,000	4,000	4,000	Training, workshop and conference	16,000	
	Subtotal Budget Heading 1	230,590	658,302	790,600	775,600	685,601		3,140,693	
	1.1 Provide advisory support to the leadership of the MACCom and the TACCom to carry out their respective mandates	39,109	13,000	13,000	13,000	13,000	13,000	Experts	91,109
		2,178	6,000	6,000	6,000	6,000	6,000	Training, workshop and conference	26,178
	1.2 Provide technical assistance to plan and report on the meetings of the MACCom and TACCom		16,250	16,250	16,250	16,250	16,250	Experts	65,000
			8,000	8,000	8,000	8,000	8,000	Training, workshop and conference	32,000
	1.3 Train and advise governmental and non-governmental stakeholders on strategic planning, monitoring and evaluation, and the substantive areas of the NACS, while building broader public knowledge on related topics	10,384	5,000	5,000	5,000	5,000	5,000	Experts	66,400
			18,400	16,000	16,000	16,000	16,000	Training, workshop and conference	72,000
		28,800	14,400	14,400	14,400	14,400	Audio Visual&Printing Production Costs	30,384	
		70,000	30,000	30,000			Contract for services (La Sageesse University and others)	100,000	
1.4 Formulate the annual work plans for NACS implementation and related M&E frameworks		24,500	6,500	6,500	6,500	6,500	Experts	44,000	
		7,788					Travel	7,788	
		7,200	4,800	4,800	4,800	4,800	Training, workshop and conference	21,600	
		20,000	2,000	2,000	2,000	2,000	Information Technology, equipment and maintenance	26,000	

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Budget Heading		5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	Audio Visual&Printing Production Costs	20,000	
3: Specialized anti-corruption legislations enacted and supported for effective implementation	1.5 Enable the development and dissemination of regular public reporting on the NACS		4,800	14,800	14,800	14,800	14,800	14,800	14,800	Training, workshops and conferences	49,200	
	1.6 Set up and support an economic media to inform, advocate for, monitor, and communicate on the implementation of the NACS		7,500	12,500	12,500	12,500	12,500	12,500	12,500	Audio Visual&Printing Production Costs	45,000	
			5,000	5,000	5,000	5,000	5,000	5,000	5,000	Contractual services companies	20,000	
		8,964	18,750	18,750	18,750	18,750	18,750	18,750	18,750	Experts	83,964	
		19,094	47,400	47,400	47,400	47,400	47,400	47,400	47,400	Training, workshops and conferences	208,694	
		17,194	20,000	20,000	20,000	20,000	20,000	20,000	20,000	Audio Visual&Printing Production Costs	97,194	
		5,075	15,000	15,000	15,000	15,000	15,000	15,000	15,000	Media costs	65,075	
		27,800	39,000	39,000	39,000	39,000	39,000	39,000	39,000	Contractual services companies	144,800	
	Subtotal Budget Heading 2	101,998	376,188	299,400	269,400	269,400	269,400	269,400	269,400		1,316,386	
	2.1 Provide policy advice and legislative drafting assistance to parliamentary committees and groups responsible for developing and overseeing implementation of anti-corruption bills		27,430	6,500	6,500	6,500	6,500	6,500	6,500	6,500	Experts	53,430
			447.76	2,500	5,000	5,000	5,000	5,000	5,000	5,000	Audio Visual&Printing Production Costs	17,948
	2.2 Support participatory development of action plans for the implementation of anti-corruption bills enacted by parliament		6,500	6,500	6,500	6,500	6,500	6,500	6,500	6,500	Experts	26,000
		4,800	4,800	4,800	4,800	4,800	4,800	4,800	4,800	Training, workshop and conference	19,200	
		5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	Audio Visual&Printing Production Costs	20,000	

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Budget Heading	UNCAC implementation	27,878	426,971	381,300	351,400	323,900	UNDP			
Subtotal Budget Heading 3		27,878	426,971	381,300	351,400	323,900			1,511,449	
4: Output 3 National Anti-Corruption Institution operationalized and strengthened	3.1 Provide advisory support to the leadership of NACI	7,800	10,000	10,000	10,000	10,000		Experts	47,800	
	3.2 Conduct capacity assessment for NACI and key related cooperating oversight, financial and justice entities			10,000	10,000	0	0		Trainings, workshops and conferences	40,000
				10,000	10,000	0	0		Experts	20,000
				15,000	15,000	0	0		Travel	20,000
	3.3 Design and regularly update the capacity development plan for NACI and key related cooperating oversight, financial and justice entities			5,000	5,000	0	0		Trainings, workshops and conferences	30,000
				15,000	15,000	0	0		Audio Visual&Printing Production Costs	10,000
				10,000	10,000	0	0		Experts	30,000
	3.4 Advise NACI board members, and train/mentor its staff, on the implementation and monitoring of the NACS, the UNCAC and SDG 16			10,000	15,000	15,000	15,000		Travel	20,000
				10,000	10,000	5,000	5,000		Trainings, workshops and conferences	55,000
				20,000	20,000	20,000	20,000		Audio Visual&Printing Production Costs	30,000
	3.5 Train and Mentor NACI staff on its investigative role together with other entities that have relevant police and judicial functions			20,000	20,000	20,000	20,000		Experts	80,000
				20,000	20,000	20,000	20,000		Travel	80,000
			20,000	30,000	30,000	30,000		Trainings, workshops and conferences	110,000	
3.6 Support implementation of			7,500	7,500	7,500	5,000		Audio Visual&Printing Production Costs	27,500	
			40,000	40,000	20,000	20,000		Experts	120,000	
			15,000	30,000	30,000	30,000		Travel	105,000	
			15,000	20,000	20,000	20,000		Trainings, workshops and conferences	75,000	
			10,000	10,000	10,000	10,000		Audio Visual&Printing Production Costs	40,000	
			50,000	50,000	40,000	30,000		Experts	170,000	
			30,000	30,000	30,000	20,000		Trainings, workshops and	110,000	

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Budget Heading 5: Output 4 Corruption risk management mechanisms integrated in key vulnerable sectors	other prioritized interventions proposed under the NACI capacity development plan including, but not limited to, legal, management technological and public outreach capacities		40,000	40,000	25,000	25,000	25,000	130,000
		200,000	250,000	80,000	80,000	80,000	610,000	
		20,000	20,000	20,000	15,000	15,000	75,000	
	Sub-Total for Budget Heading 4	7,800	592,500	677,500	392,500	365,000	2,035,300	
	4.1 Organize policy dialogues on corruption prevention at sectoral level and comparative experiences	1,800	21,875	21,875	21,875	21,875	21,875	89,300
	4.2 Support establishing and training inclusive sectoral task forces in selected sectors	1,800	21,875	21,875	21,875	21,875	21,875	89,300
		1,584	12,500	12,500	12,500	12,500	12,500	51,584
	4.3 Provide technical assistance for developing plans for managing risk of corruption in key selected sectors	1,800	21,875	21,875	21,875	21,875	21,875	89,300
			10,000	10,000	10,000	10,000	10,000	40,000
	4.4 Promote coalition-building to monitor and advocate for integrity in selected sectors	1,800	21,875	21,875	21,875	21,875	21,875	89,300
		10,000	10,000	10,000	10,000	10,000	40,000	

VIII. GOVERNANCE AND MANAGEMENT ARRANGEMENTS

The project will be implemented through the UNDP Direct Implementation Modality (DIM) where the UNDP Country Office in Lebanon 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 Resident Representative. OMSAR will be the primary national counterpart on the account of its own roles and responsibilities within the Government, and the position of the OMSAR Minister as the Chairperson of the TACCoM. Other national stakeholders will be regularly consulted and key representatives thereof will be invited to be on the Project Board, in addition to OMSAR, namely the Ministry of Justice, the NACI once operationalized, and a representative of a regionally and internationally recognized Lebanese civil society organization. The OMSAR Minister will also act as liaison with the MACCom and the TACCom to ensure that national priorities are accounted for in project implementation and that adjustments and new decisions related to the implementation of the NACS are reflected, to the best extent possible, in project work plans and the implementation of its key activities.

The UNDP Anti-Corruption for Trust in Lebanon project is governed by a Project Board, which will provide strategic direction and address possible implementation issues to ensure quality delivery of results. The Board is co-chaired by UNDP's Resident Representative and the Minister of State for Administrative Reform in his capacity as the Head of the Technical Anti-Corruption Committee. The Project Board also includes representatives (one for each) of the Ministry of Justice, the NACI (once operationalized), the Lebanese Transparency Association (LTA), and each of the project's donors. Other organizations/institutions may be invited to the meetings of the Project Board, as needed, and attend as observers. The Project Board will meet on a quarterly basis or as needed, to provide strategic guidance and recommendations on the overall project orientation, and strategic priorities. In particular, the Project Board will: Provide overall guidance and strategic direction for the project; Review the achievement of results, as captured in the project's work plan; Provide guidance on challenges and issues, which may arise during the implementation of the project; Identify and assess risks to the project and advise on relevant approaches/strategies to address them effectively.

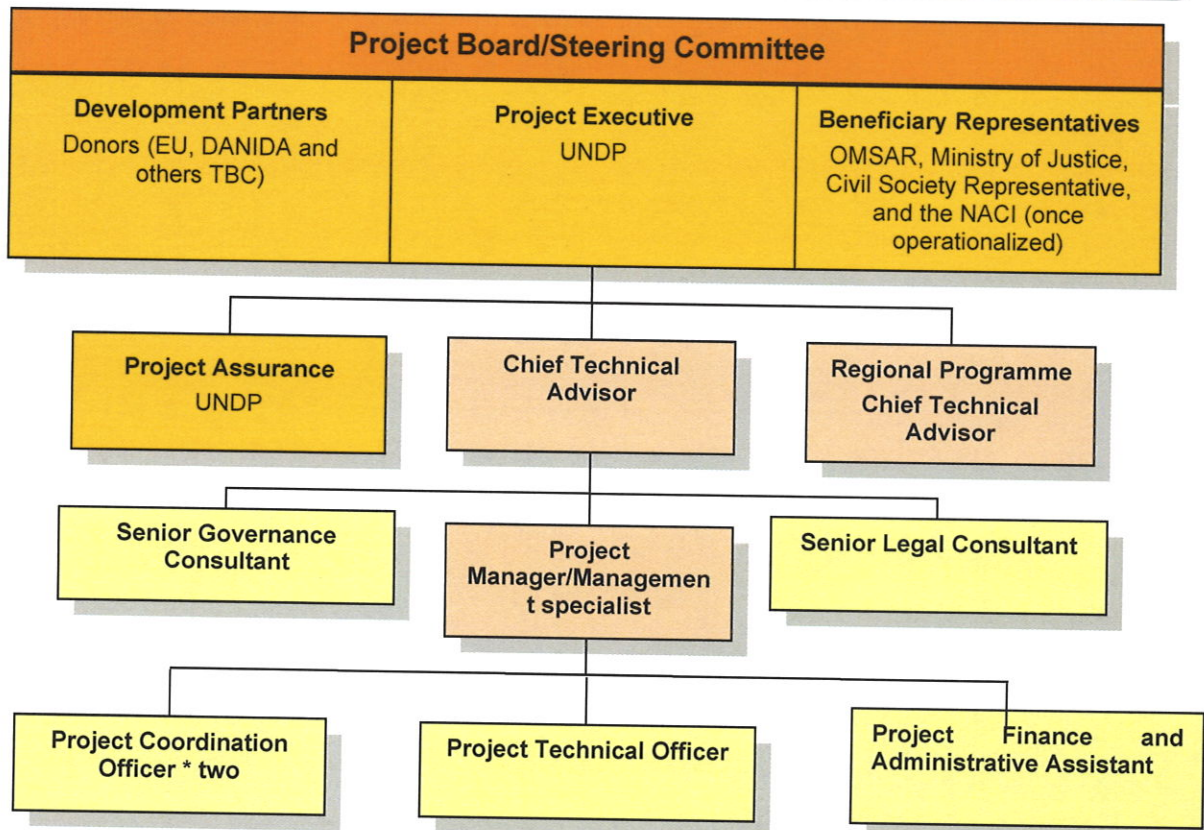
Project Assurance

Project assurance is the responsibility of UNDP's Governance Programme Manager. The Project Assurance role supports the Board by carrying out objective and independent project oversight and monitoring functions, ensuring project management milestones are managed and completed. The project will receive advisory support from UNDP's Regional Anti-Corruption Programme.

Audit

The project shall be subject to the internal and external auditing procedures laid down in the Financial Regulations, Rules and directives of UNDP".

Project Organization Structure



IX. LEGAL CONTEXT

This project document shall be the instrument referred to as such in Article 1 of the Standard Basic Assistance Agreement between the Government of Lebanon and UNDP, signed on February 10, 1986. All references in the SBAA to "Executing Agency" shall be deemed to refer to "Implementing Partner."

This project will be directly implemented by UNDP 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.

X. 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]³ [UNDP funds received pursuant to the Project Document]⁴ 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 program 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 [*for 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 party's, subcontractor's and sub-recipient's

³ To be used where UNDP is the Implementing Partner

⁴ To be used where the UN, a UN fund/programme or a specialized agency is the Implementing Partner

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, considering the security situation in the country where the project is being carried;
 - ii. assume all risks and liabilities related to such responsible parties, 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 parties, 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. Each responsible party, subcontractor or sub-recipient agrees that, where applicable, donors to UNDP (including the Government) whose funding is the source, in whole or in part, of the funds for the activities which are the subject of the 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.

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.