



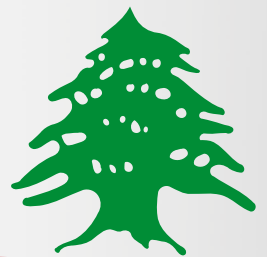
**Anti Corruption  
National Strategy**

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# **The National Anti-Corruption Strategy**

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2020 - 2025







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2020 - 2025



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National Strategy**



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## Executive summary

The National Anti-Corruption Strategy is the first document of its kind in the history of the Lebanese Republic. It expresses an unprecedented political will and an urgent community-based desire to insulate the country from the risks of corruption, and support efforts aiming at devising sustainable solutions. Effective solutions will address the massive economic and financial challenges which have accumulated in recent years and reform the structural distortions in governance, with a view to putting the country on the path to equitable and comprehensive development.

Further, the Strategy seeks to reflect the reforms the Lebanese government has committed to achieving in regards to its citizens and international partners, as well as the government's commitment to respond to the people's repeated calls for change and other legitimate demands regarding corruption expressed in the uprising of October 17, 2019. Moreover, the Strategy is aligned with the 2030 Global Agenda for Sustainable Development and with Lebanon's commitments to the United Nations Convention against Corruption (UNCAC) and other regional and international treaties and conventions.

The Strategy was developed through a cumulative process led by the Ministerial Anti-Corruption Committee and its supporting technical committee, both established in December 2011. It was developed in consultation with ministers, members of parliament, judges, public sector officials, and representatives of the civil society and private sector, and it draws on the expertise, comparative experiences, and technical support of the United Nations Development Programme (UNDP). The process of drafting the Strategy began in February 2016, based on reports and recommendations elaborated during a preparatory phase, and ended with the approval of the Council of Ministers. With this new, specialized public policy regarding corruption that expresses national priorities and needs, aligns with the Lebanon's regional and global commitments, and constitutes a starting point for serious anti-corruption activities, Lebanon can now join the list of countries where fighting corruption is of official priority. The concrete results stemming from this strong foundation will complete the process of building a modern state, strengthen civil peace, and provide a decent quality of life for all Lebanese citizens.

This document provides a realistic, practical, and measurable national roadmap for the period between 2020 and 2025. It begins with an objective interpretation of the reality of corruption in Lebanon, as well as the efforts to fight it. Next, it defines an ambitious vision and a clear mission through which it seeks to achieve three major objectives: enhancing transparency, activating accountability, and ending impunity. The strategy translates these objectives into seven targeted Outcomes, measurable by scientific indicators and divided into 34 Outputs. For each Output, concrete areas of work, specific timelines, and key responsible parties are assigned in a bid to ensure the greatest possible effectiveness. Each of these parties is responsible for developing and submitting annual action plans and required budgets within the framework of a unified and coordinated mechanism at the national level to follow up on the implementation of the National Strategy.





The first targeted Outcome is the completion and activation of specialized anti-corruption legislation that serve as the backbone of any effective anti-corruption system. The second and third Outcomes involve public function and public procurement, two cornerstones of the public sector, and crucial points at which the public sector relates to the private sector and the general public. The Outcomes aim to reduce the extent to which public function and public procurement is exposed to corruption, and enhance their overall integrity. The focus then shifts to the judicial and oversight systems in the fourth and fifth Outcomes, in light of their role in ensuring proper implementation of laws and regulations – in particular, anti-corruption laws and regulations. The sixth Outcome is to engage all components of Lebanese society in fostering a culture of integrity. The seventh and final Outcome allows for the institutionalized integration of the corruption prevention approach, first among specific sectors, and gradually down to all sectors. This will make possible solutions that are adapted to the specificity of corruption and the requirements for fighting it in each sector. This will also boost the possibility for concrete successes felt by citizens, workers in these sectors, and the general public. The seventh Outcome will be in parallel and complementary to the aforementioned six Outcomes.

The Outcomes won't be achieved without appropriate implementation over the next five years. This document concludes by reviewing the factors needed for success, including a national mechanism to follow up on the execution of the Strategy in accordance with best practices established by comparative experiences, but tailored to the Lebanese context.



## Introduction

This introduction reviews the general context, internally and externally, in which the National Anti-Corruption Strategy was developed. It also provides a brief explanation of the Strategy's drafting process, characterized by its institutional and participatory approach. It also presents the methodology of the document including its structure and the relationship between its various sections.

### • General context

According to the latest studies and reports, the world is fighting a fierce battle against corruption, which threatens development, stability, and security at the national, regional, and global levels. Corruption limits economic competitiveness, has a 'crowding out' effect on investments, reduces the quality and accessibility of basic services, lowers people's trust in the state, undermines the state's ability to protect their security and rights, and provides a fertile environment for organized crime<sup>1</sup>. The direct annual cost of the crime of bribery alone globally amounts to two trillion USD, equivalent to 2% of the world's total GDP. But the true economic and social cost of corruption is much greater than that, given that bribery is just one of many forms of corruption<sup>2</sup>. Indirect financial losses, those resulting from missed development opportunities, and other damages are difficult to estimate, especially those that adversely impact people's health, lives, and dignity.

Therefore, efforts have been exerted in recent years to eradicate corruption by establishing the principles of democratic rule, implementing the rules of good governance, and taking additional actions to set unified and strict standards that mitigate the risk of corruption and end impunity. These efforts culminated in 2003, with the adoption of the United Nations Convention against Corruption (UNCAC). The UNCAC is considered the most comprehensive international binding legal framework, with more than one hundred and seventy-eighty state parties and regional economic integration organizations. The international anti-corruption conventions preceding the UNCAC were limited – either to specific regions, such as the Inter-American Convention Against Corruption (IACAC) in 1996, or to specific aspects of corruption, like the 1997 Organization for Economic Co-operation and Development (OECD) Anti-Bribery Convention which only addresses the crime of bribery in relation to foreign public officials in international business transactions.

The adoption of the UNCAC in 2005 was an important turning point, as it brings more attention than ever to this dangerous phenomenon. UNCAC created a common language for anti-corruption among countries around the world, and laid the foundation for a number of new regional and international initiatives. These include:

<sup>1</sup> Klaus Schwab, World Economic Forum, 2018, the Global Competitiveness Report. See also, Jan Hanousek and Anna Kochanová. Bribery environment and firm performance: Evidence from Central and Eastern European countries, 2015. See also, Organization for Economic Co-operation and Development, 2015, Consequences of Corruption at the Sector Level and Implications for Economic Growth and Development. See also, Department for International Development and UK Aid, January 2015, Why corruption matters: understanding causes, effects and how to address them- Evidence paper on corruption. See also, Transparency International, February 2014, Corruption as a Threat to Stability and Peace. See also, Transparency International, May 18, 2018, Corruption in Justice and Security. See also, United Nations Office on Drugs and Crime, 2011, Corruption, Environment and the United Nations Convention against Corruption. .

<sup>2</sup> International Monetary Fund, May 2016, Corruption: Costs and Mitigating Strategies.



- the Stolen Asset Recovery (StAR) Initiative launched by the United Nations Office on Drugs and Crime (UNODC) and the World Bank in 2007;
- the Arab Anti-Corruption and Integrity Network (ACINET) established in 2008;
- the International Anti-Corruption Academy Convention launched in 2010;
- the Arab Anti-Corruption Convention adopted in 2010; and
- the G20 Anti-Corruption Working Group (ACWG) established in 2010.

Moreover, in September 2015, world leaders incorporated anti-corruption in the core of the 2030 Global Agenda on Sustainable Development Goals (SDGs), namely in Goal 16 on “Peace, Justice, and Strong Institutions.”

This commitment comes in the context of an increasing number of countries establishing specialized anti-corruption agencies, drawing on successful experiences among Southeast Asian countries.<sup>3</sup> Further, several states have developed and implemented national anti-corruption strategies and specialized legislation, such as laws on the right of access to information, whistleblowers’ protection, management of conflict of interest, combating illicit enrichment, and recovery of public assets stolen by corruption and other methods. These developments have taken place in poor, rich, emerging, and developed countries alike.


Despite the many positive steps taken in the past two decades, calls to exert more efforts to fight corruption have not slowed down. On the contrary, they have only increased. State leaders and regional and international organizations have called for increased anti-corruption efforts on countless occasions.<sup>4</sup> This is due to mounting global financial and economic pressure, increased awareness of the consequences of corruption, and increased belief in the need to expand and deepen reform efforts. Finally, the exposure of high-profile corruption schemes around the world, involving prominent politicians from every continent and renowned multinational corporations, as well as banking and financial institutions has made the phenomenon of corruption increasingly difficult to ignore. Even more difficult, in light of these revelations, is the continued evasion of the obligation to address it.<sup>5</sup>

The Lebanese Republic formally joined this global trend by joining the UNCAC in October 2008, and becoming a state party in 2009. But this is not the first national anti-corruption effort. Indeed, there have long been official efforts to fight corruption. These have included sporadically addressing corruption cases via oversight and judicial processes, initiatives to simplify and automate administrative procedures in a number of ministries, and steps to develop public policy and specific programs to improve the efficiency of the public sector. Specialized legislation has also been drafted, some of which has been enacted by Parliament in the past two years. Finally, a Ministerial Anti-Corruption Committee and a supporting technical committee were established in December 2011. These, in the years that followed, assessed legislative and executive anti-corruption efforts and proposed specific reforms to improve their compliance with the UN convention.

<sup>3</sup>. United Nations Programme for Development, 2005, Institutional Arrangements to Combat Corruption: A Comparative Study. See also, United Nations Programme for Development, 2011, Practitioners’ Guide: Capacity Assessment of Anti-Corruption Agencies. See also, Dr. John S.T. Quah, Transparency International. 2017, Anti-Corruption Agencies in Asia and Pacific Countries: An Evaluation of their Performance and Challenges. See also, United Nations Development Programme, 2012, Anti-Corruption Agencies: Reflections on International Standard and Experiences and Considerations for Arab Countries. See also, Bertrand de Speville. 2012, Overcoming Corruption.

<sup>4</sup>. Speech of the UN Secretary General António Guterres marking the 15th anniversary of the United Nations Convention against Corruption, May 23, 2018.

<sup>5</sup>. Transparency International, April 4, 2019, Three Years after the Panama Papers: Progress on Horizon.



However, the reality shows that success in the field of anti-corruption has remained a rare exception to the rule, due to several interrelated external and internal factors highlighted in the first part of this document. This document shows that Lebanon, since emerging from the calamity of the civil war, has never systematically dealt with the problem of corruption in line with international standards and drawing from lessons learned from comparative experiences in other national contexts. Moreover, anti-corruption efforts have never been placed within a unified national vision or in an institutional framework that can be monitored, evaluated, and held accountable.

This structural deficiency is clearly reflected in Lebanon's low-ranking position according to various indicators of good governance, including transparency, accountability, integrity, and anti-corruption. Studies and opinion polls show that corruption is an epidemic that is rampant and expanding all over the country. Corruption significantly burdens Lebanon's public finances, opportunities for economic growth, and the ability of Lebanese citizens to live in dignity.

In recognition of the seriousness of this difficult reality, and in response to the growing political, economic, and social calls to fight corruption, the Lebanese state has voiced, on more than one occasion, its will to fight corruption. Previous governments have included it in several of their ministerial statements as well as in the Vision for Stabilization, Growth, and Employment the government presented in 2018 at the Economic Conference for Development through Reforms with the Private Sector (CEDRE). However, these efforts have failed to foment a comprehensive, binding, and widely adopted national strategy. Anti-corruption efforts have remained extremely limited in their concrete impact.

This situation coincides with Lebanon's current unprecedented economic and financial crisis, exacerbated by the Covid-19 crisis ravaging Lebanon and the world. Indicators show an acceleration of the economic recession, an increase in the average inflation, and high levels of unemployment and poverty. Added to these realities is a sharp widening of the public budget deficit, as revenue collection collapses. The situation is worsened by the paralysis of the banking sector, as the distribution of credits and inflows of incoming deposits stops, and prices rise due to monopoly and the continuous de facto depreciation of the Lebanese pound caused by the parallel market.

In light of these challenges, the National Anti-Corruption Strategy is an integral part of the reform program proposed by the 'Government of Facing Challenges'. The program aims to address head-on public economic and financial imbalances, reduce the current account deficit, place public debt on a steady downward path, restore the stability of the financial sector, regain confidence, create a social safety net, mobilize urgent external support, and put the country back on track for sustainable long-term growth.



## • The Process of Development since 2009

The Constitution stipulates that the international treaties to which Lebanon adheres are part of the national legal system and supersede domestic laws, in accordance with Article 2 of the Code of Civil Procedure. When the Lebanese Republic officially joined the UNCAC in 2009, it became the state's duty to reevaluate the country's anti-corruption system in provision and practice, as well as to update and strengthen it to comply with international standards in the UNCAC in four main areas: preventive measures, criminalization and law enforcement, international cooperation, and asset recovery.


Accordingly, and in implementation of UNCAC Article 5(1) that requires party states to "develop and implement or maintain effective, coordinated anti-corruption policies," Prime Minister Najib Mikati established a Ministerial Anti-Corruption Committee on December 27, 2011, via virtue of Decision No. 156/2011. The creation of the committee also serves to fulfill other related international and regional obligations, including those of the Arab Anti-Corruption and Integrity Network (ACINET). The committee is headed by the Prime Minister and includes as deputy president the Minister of State for Administrative Reform, and as members the Minister of Finance, the Minister of Justice, and the Minister of Interior and Municipalities. Prime Minister Mikati also established, by virtue of Decision No. 157/2011, a technical committee supporting the Ministerial Anti-Corruption Committee, headed by the Minister of State for Administrative Reform. The technical committee includes as members representatives of the Prime Minister's Office, the Ministry of Justice, the Ministry of Finance, the Ministry of Interior and Municipalities, the Higher Judicial Council, the Council of State, the Central Inspection, the Civil Service Board, the Court of Accounts, the Public Prosecution, the Higher Disciplinary Committee, the Central Bank, and the Ministry of State for Administrative Reform<sup>6</sup>. In March 2017, the Prime Minister amended these two Decisions to include the Minister of State for Anti-Corruption Affairs as a member of the Ministerial Committee<sup>7</sup>, and his representative as member of the Technical Committee, before the abolition of this ministry at a later stage<sup>8</sup>.

The formation of these committees established a formal mechanism for the government to address the issue of corruption in a scientific, comprehensive, impartial, and coordinated manner, in a way that involves the judicial, oversight, and banking authorities, with the participation of civil society, the media, the private sector, and regional and international partners. Within this unprecedented institutional and participatory framework, work began to develop a national anti-corruption strategy, with technical support from the United Nations Development Programme (UNDP). Significant preparatory work was done between 2012 and 2015 by committees comprising experienced and specialized people from the Lebanese government, who often worked overtime and without financial compensation to accomplish their tasks.

<sup>6</sup>. According to Decision no. 108/2014 amending Article 1 of Decision no. 157/2011 dated 27/12/2011 [on establishing a Technical Committee supporting the Ministerial Anti-Corruption Committee]

<sup>7</sup>. According to Decision No. 69/2017 amending Article 1 of Decision No. 156/2011 dated 27/11/2011 [on establishing a Ministerial Anti-Corruption Committee] and according to Decision No. 68/2017 amending Article 1 of Decision No. 157/2011 dated 27/11/2011 [on establishing a Technical Committee supporting the Ministerial Anti-Corruption Committee].

<sup>8</sup>. Cabinet Formation Decree no. 4340 dated 31/1/2019



In November 2012, the Minister of State for Administrative Reform, Mohammad Fneish, formed a sub-committee<sup>9</sup> to conduct a comprehensive assessment of how compatible Lebanese law is with Chapters III and IV of UNCAC, concerning the criminalization of corruption, law enforcement, and international cooperation. During the following year, the report was finalized and consultations with various concerned parties<sup>10</sup> regarding its content were completed. Then, it was published in full along with an executive summary.<sup>11</sup> This coincided with the establishment by Minister Fneish of another sub-committee in April 2013<sup>12</sup>, tasked with developing proposals for the national anti-corruption strategy. This sub-committee carried out its task based on a consultative process and published a report<sup>13</sup>.

In May 2014, the Minister of State for Administrative Reform, Nabil De Freij, continued this work by establishing two sub-committees<sup>14</sup> that worked simultaneously to complete what had previously been done to assess Lebanese laws and practices in comparison with the provisions of the UNCAC. This time, the work was focused on the Preventive Measures against corruption and the Recovery of Assets (Chapters II and V of UNCAC). The two reports were completed and submitted to Prime Minister Tamam Salam and the rest of the members of the Ministerial Committee in April 2015.

Continuing these efforts, on February 18, 2016, Minister De Freij established a sub-committee entrusted to develop a national anti-corruption strategy<sup>15</sup>. The sub-committee relied on the experience of its members and on the findings of the preparatory work. It also studied comparative experiences fighting corruption in other national contexts, and multi-source studies and reference documents related to anti-corruption in Lebanon, and in Arab and foreign countries. The sub-committee also took into consideration the resolutions and decisions adopted by the Conference of the States Parties in the UNCAC, the recommendations of several specialized regional and international organizations and networks, and other proposals and statistics submitted in writing by representatives of the Ministry of Justice, Office of the Minister of State for Anti-Corruption Affairs, Central Inspection, Civil Service Board, Higher Disciplinary Committee, and Special Investigation Commission, within the framework of the technical committee supporting the Ministerial Anti-Corruption Committee.

The sub-committee adopted a participatory approach by organizing a series of consultations with several concerned parties, which took place from March 2016 to January 2017. The series included 22 meetings with ministers, members of parliament, heads of oversight bodies, public officials, as well as representatives of the free trade syndicates, civil society organizations, and private sector.

**9.** According to Decision no. 184 dated 13/11/2012 (on establishing a technical sub-committee to respond to the self-assessment (United Nations Convention against Corruption)

**10.** United Nations Development Programme. December 5, 2013. Workshop Report: Supporting the Implementation of the United Nations Convention against Corruption. See also, Ministry of State for Administrative Reform and United Nations Development Programme. May 2013. Summary of the Self-Assessment of the Implementation of Chapters III and IV of the United Nations Convention against Corruption.

**11.** Conference of the States Parties to the United Nations Convention against Corruption. 2016. Country Review Report of Lebanon – Review of the implementation of the United Nations Convention against Corruption. See also, Conference of the State Parties to the United Nations Convention against Corruption. 2016. Review of the implementation of the United Nations Convention against Corruption. Executive Summary. Note by Secretariat. Report no. CAC/COSP/IRG/1/4/1/Add.31.

**12.** According to Decision No. 85 dated 19/4/2013 (on establishing a committee tasked to develop proposals for the National Anti-Corruption Strategy) amended by Decision No. 104 dated 9/5/2013

**13.** Sub-Committee for the Development of proposals for the National Anti-Corruption Strategy. November 2013. Proposals for a National Anti-Corruption Strategy.

**14.** According to Decision No. 63 dated 23/5/2014 (on establishing a sub-committee for the assessment of the implementation by Lebanon of the measures for the recovery of assets included in Chapter V of the United Nations Convention against Corruption). According to Decision No. 64 dated 23/5/2014 (on establishing a sub-committee for the assessment of the implementation by Lebanon of the preventive measures included in Chapter II of the United Nations Convention against Corruption)

**15.** Decision No. 174 dated 18/2/2016 (on establishing a focus group for the development of a National Anti-Corruption Strategy).




As a result of these consultations, the sub-committee developed a first draft of the National Anti-Corruption Strategy and presented it for discussion at the Technical Committee meetings chaired by the Minister of State for Administrative Reform, Dr. Inaya Ezzedine, on March 14 and March 23, 2017. Subsequently, the draft was revised and presented on April 27 at a joint meeting of the Ministerial Anti-Corruption Committee and its supporting technical committee, chaired by Prime Minister, Saad El-Din Al-Hariri. The meeting concluded with a recommendation to develop an implementation framework for the strategy to guide its implementation, including specific Outcomes and Outputs that can translate into work programs with clear deadlines and responsible parties. The ministerial statement made by the government at the time was the first in the history of Lebanon to include a commitment to develop a national anti-corruption strategy.

As per the meeting's recommendation, the Minister of State for Administrative Reform, Dr. Inaya Ezzedine, requested technical support from the United Nations to accelerate the process and assist in developing the required implementation framework, based on extensive consultations with the concerned parties. This comes as an outgrowth of the groundbreaking commitment made in the ministerial statement. Based on this request, UNDP put together a team of experts to work with the members of the subcommittee, between January and April 2018, to conduct a second phase of consultations. This next phase consisted of 32 meetings and workshops attended by more than one hundred officials, experts, senior level judges, ministry representatives, as well as representatives of the private sector and civil society. Official correspondences were also sent to all ministries to identify their efforts and directions in this field. After this phase of consultations, the strategy's draft was revised, resulting in an implementation framework that includes detailed, targeted, and achievable results taking into consideration both the specificities of the national context and international standards. The product of that process was included in the supporting documentation presented at the CEDRE Conference. The draft strategy and implementation framework were announced in an official ceremony held at the Grand Serail on April 4, 2018, under the patronage of Prime Minister Saad El-Din Al-Hariri, as per the commitments made by the Government in its ministerial statement.

Following the parliamentary elections of May 2018, a new government was formed. It pledged in its ministerial statement to undertake a number of structural reforms, including the "adoption of the National Anti-Corruption Strategy and its implementation plan and enacting related bills...." Following that pledge, the Minister of State for Administrative Reform, Dr. May Chidiac, submitted the draft strategy to the Council of Ministers for review at its meeting on April 4, 2019, with the goal of updating and reformulating it to better reflect the new directions of the government. This resulted in the establishment of a ministerial committee comprising the members of the Ministerial Anti-Corruption Committee, along with other members including the Deputy Prime Minister, the Minister of State for Presidential Affairs, and Minister of State for Parliamentary Affairs.<sup>16</sup> The Ministry of State for Administrative Reform was mandated to collect and review comments received from the ministers, and submit them to the committee before presenting them to the Council of Ministers. Accordingly, the Ministry of State for Administrative Reform formed a specialized internal team to follow up on this. The collection and analysis of comments extended over a period of four months, during which intensive meetings were held with the representatives from the Ministries of Finance, Justice, Interior and Municipalities, Industry, Economy and Trade, and from the

<sup>16</sup>. Council of Ministers Decision no. 70 dated 4/4/2017 (on updating and reformulating the plan of the National Anti-Corruption Strategy as appropriate).





Ministries of State for Presidential Affairs and for Parliamentary Affairs<sup>17</sup>. In-depth technical consultation sessions with UNDP experts were also held. The committee completed its task, and the Ministry of State for Administrative Reform submitted the draft to the General Secretariat of the Council of Ministers on September 24, 2019.

With the resignation of the 'Government Of Action' against the backdrop of the popular uprising of October 17, 2019, and the formation of the 'Government of Facing Challenges' headed by Dr. Hassan Diab that gained confidence on February 11, 2020, the Minister of State for Administrative Reform, Demianos Kattar, took the initiative to update the strategy and align it with the latest developments, with the support of the Ministry's team and UNDP. On 5 May 2020, the draft strategy was presented to the Council of Ministers, and adopted on May 12, 2020.

Thus it became the first National Anti-Corruption Strategy of its kind in the country's history to be officially adopted, and an institutionalized starting point binding all parties to a new, crucial, process of implementation for the period from 2020 to 2025. This will include the testing of declared intentions, as well as mobilizing underlying potentials and resources to fight corruption in Lebanon. Finally, the Strategy will strengthen the country's ability to prevent corruption in the future.

## • Methodology

The National Anti-Corruption Strategy reflects the overall findings of the assessments, research, and consultations carried out during its development process. It seeks to reconcile the various points of view of the concerned national stakeholders, against all odds, in order to create in the coming five years an integrated roadmap of anti-corruption that is realistic, practical, applicable (in principle), and measurable, so that the progress in fighting corruption is more than simply an opinion.

The methodology used in the development of the National Strategy is in line with international anti-corruption best practices.<sup>18</sup> It seeks to avoid the populist discourse in dealing with and addressing corruption and does not rely exclusively on traditional anti-corruption methods in which simply involves the activation of judicial, prosecution, as well as financial and administrative oversight bodies. Instead, it pursues a more scientific and comprehensive approach, by taking the UNCAC as a key international reference to define the concept of corruption, by selecting the most relevant corruption prevention and combating measures, and by deriving inspiration from lessons learned from comparative anti-corruption experiences in other national contexts.

Moreover, the methodology emphasizes that fighting corruption should be at two levels: first the state as a whole, through general legal and procedural measures with regard to public procurement, the work of oversight bodies, and the right of access to information; second, the fight against corruption should occur on the sectoral level, to better address each sector's specificities and gradually introduce appropriate specialized measures without adversely affecting any of the sectors' activities. The methodology also stresses the need

<sup>17</sup>. These meetings were attended by: Mrs. Lamia Moubayed, Mrs. Rana Rizkallah, Dr. Jihane EL-Khoury (on behalf of the Ministry of Finance), Judge Rana Akoum (on behalf of the Ministry of State for Presidential Affairs), Dr. Walid Al-Naqeeb, and Lieutenant Colonel Wajdi Kulaib (on behalf of the Ministry of Interior and Municipalities), Judge Ayman Ahmed, Judge Rana Akoum, Judge Jad Maalouf (on behalf of the Ministry of Justice), Dr. Abdel Halim Fadlallah, Dr. Muhammad Tay and Dr. Hussein Al-Ezzi (on behalf of the Ministry of State for Parliamentary Affairs), Mr. Bassam Jouni (on behalf of the Ministry of Industry) and Mr. Razi Al-Hajj (on behalf of the Ministry of Economy and Trade).

<sup>18</sup>. United Nations Office on Drugs and Crime. 2015. National Anti-Corruption Strategies: A Practical Guide for Development and Implementation.





for concerted efforts on the part of a wide range of concerned parties, spearheaded by the political authority, and including specialized institutions such as supervisory and judicial bodies, ministries, public institutions, municipalities and legal persons of public law, alongside private sector and societal components such as individuals, groups, syndicates, and civil, educational, cultural, religious, and media organizations.

Additionally, the methodology deliberately does not associate the required anti-corruption reform steps too closely with the broader and more comprehensive political, economic, and social reforms, a linkage which some find necessary. This document recognizes the importance of the broad-scale reforms, and even refers to them as necessary for enabling an environment of anti-corruption, but does not consider the larger reforms a prerequisite to achieve tangible progress against corruption which will positively impact the economic and living conditions of the Lebanese citizens.

This process as a whole is embodied in this document, including an introduction, two narrative parts, and a conclusion, as well as an Implementation Framework Matrix, a Monitoring and Evaluation Matrix, a list of references, and five annexes. The Strategy seeks to balance between ambition and reality, and national specificities and international standards. Further, it does not include elaborated theoretical analysis and maintains, as much as possible, the necessary practicality and flexibility for such type of documents, especially given that this is the first of its kind in Lebanon.


The introduction provides a brief explanation of the overall national context of the Strategy, a discussion of its drafting process, and an explanation of the document's methodology that emerged from this process.

Then, the first narrative part covers the theoretical framework upon which the Strategy relies, including the definition of the concept of Corruption that it adopts, a general overview explaining the status of corruption in Lebanon and the factors leading to its spread, with a brief section on anti-corruption efforts exerted so far.

The second narrative part includes the Implementation Framework clarifying the Vision and Mission on which the Strategy is based. The Vision was drafted to express Lebanese citizens' aspirations and to reflect the far-reaching purposes of the National Anti-Corruption Strategy: to provide the elements needed to build a prosperous society with sustainable development standards. The Mission was drafted to express the Strategy's ultimate goal: to contribute directly to the accomplishment of the Vision. To support this, the Strategy focuses on three major Objectives, and will work to achieve them within a five-year time frame that starts in 2020 and ends in 2025. These Objectives are also compatible with the UNCAC objectives.

In addition, the Strategy draws on best practices in the field of Strategic-Planning, and adjusts them to the specificities of the Lebanese context. The Strategy translates the three desired Objectives into interconnected targeted results according to so-called Results-Based Management.<sup>19</sup> These targeted results take the form of seven Outcomes, which are further divided into 34 Outputs. The Strategy defines for each Output a set of indicators – to measure the degree of completion – and areas of work with specific timeframes and key responsible parties.

<sup>19</sup> United Nations Sustainable Development Group. March 2010. Results-Based Management Handbook. See also, Community of Practice on Results-Based Management. European Union. May 2019. Sourcebook on results based management in the European Structural Funds. See also, The World Bank, Washington. 2012. Designing a Results Framework for Achieving Results: a How-to Guide.



In the conclusion, the document addresses the key factors on which the success of the National Anti-Corruption Strategy will depend. The conclusion also outlines the national mechanism that should be put in place to follow up on the implementation of the Strategy in an institutional, participatory, and sustainable manner, in line with national and international standards governing anti-corruption efforts.

The document also includes the Implementation Framework Matrix that clarifies the targeted results in detail, and the Monitoring and Evaluation Matrix, along with a list of the main references used while drafting the Strategy, and five annexes. The first and second Annexes include the recommendations of the sub-committee formed in 2016 to draft the Strategy and those of sub-committee formed in 2013 to develop preliminary proposals. The third Annex lists the official Decisions made by the specialized Lebanese authorities which allow for the establishment of the institutional process entrusted with the development, implementation, and follow up of the Strategy; these are the Ministerial Anti-Corruption Committee, its supporting Technical Committee, and various ensuing sub-committees. The fourth Annex includes official statistics provided by Central Inspection, the Higher Disciplinary Committee, and the Special Investigation Commission. Finally, the fifth Annex lists the most important meetings and consultations that took place over three stages between 2016 and 2019.

The National Anti-Corruption Strategy document does not cover details related to annual work plans, including the necessary budgets. As indicated in the conclusion, these details are to be tackled after the Strategy is officially adopted and becomes general policy binding to all concerned parties. The development of annual work plans and budgets are tasks that will be handled by a special national mechanism intended to follow up on the implementation of the Strategy. This requires a solid basis and a specialized platform for each group of key parties tasked with the implementation of the Strategy's Outcomes. Each of these groups shall set their respective work plans that covers all relevant Outputs, in consultation between them, and in accordance with their specializations and circumstances, without prejudice to the obligations included in the text of this Strategy that constitute a national reference for anti-corruption efforts.

This gradation of work and the separation between the Strategy's general Implementation Framework and its detailed work plans, give the parties entrusted with implementing the Strategy a greater sense of ownership of the action plans' content in all their details and encourage them to assume all responsibility in this regard. This also allows them a degree of flexibility to develop and amend these plans in light of changing circumstances, including opportunities and challenges that may arise at the operational level, without needing to return to the Council of Ministers to readopt the Strategy every time.

# Part I: Status of corruption and anti-corruption in Lebanon

Part I begins with the Strategy's working definition of corruption, in order to avoid the confusion that can arise regarding this concept. It then provides an overview of the state of corruption in Lebanon. In an environment where there is a scarcity of official national data, whose credibility is often questioned, the Strategy bases its overview on relevant indicators, including studies and opinion polls. It then outlines the most important drivers of corruption in the current Lebanese context, including the political, economic, social, legislative and administrative ones. Part I concludes its interpretation of the Lebanese situation with a discussion of what the Lebanese government has done in terms of anti-corruption in recent years, based on official reports and correspondences.

## • The concept of corruption


Any strategy must start with a clear definition of its main subject matter. This is especially true in cases where the subject is a complex issue, as is the case here. Corruption involves several overlapping dimensions, including political, economic, social, cultural, historical, legal, administrative and security ones. Further, if not clearly defined, actors may exploit the vagaries of the concept to achieve illicit ends, especially in the political sphere. History has showed that the anti-corruption platform can be exploited to settle political scores, eliminate opponents, justify the restriction of public freedoms and violation of human rights, and recruit youth to join criminal or terrorist gangs.<sup>20</sup> The possibility of this type of abuse is especially high in the Lebanese context, where opinion polls and international indicators show that all forms of category-based polarization are increasing, and levels of public trust in politicians and the state is decreasing.<sup>21</sup> In an attempt to forestall this possibility, this document provides a specific, up-to-date definition of corruption according to experts.

Linguistically speaking, the term "corruption" is defined as a disorder, imbalance or harm to others. As a noun, corruption goes back to the Latin roots *cor-*, "altogether," and *rumpere*, "break." It has been a global scourge throughout history, tempting rich and poor alike, threatening states' and individuals' wealth, social security, economic growth, political systems, administrative efficiency, and their development and prosperity. Corruption can take the form of dishonest business practices. Individuals or groups can employ corrupt tactics, including but not limited to abusing a position or job, or exploiting money. Corrupt dealings are normally in violation of laws and regulations, and against the ethics and social mores in a given society or state. Cross-border corruption is usually aimed at making or increasing illicit profits, assuming a position of power, or raising social status.

Despite the value of this linguistic definition, its inherent vagueness greatly complicates the anti-corruption process, making it, in some cases, almost impossible. This is because it makes the exact definition of corruption a moving target that veers between too specific and too expansive. For instance, if we define corruption as by definition a breach of law

<sup>20</sup> Sarah Chayes. Carnegie Endowment for International Peace. January 2015. Thieves of State, Why Corruption Threatens Global Security.

<sup>21</sup> For example, Lebanon scored 1.7 points on the Public Trust in Politicians Index; i.e. below the global average of 3.22 points and the regional average of 3.74 points.



or regulation, this doesn't include corrupt practices that are technically legal. Conversely, if we define corruption too expansively, the interpretation can become arbitrary, subject to individual ideas of ethics, morality, patriotism, and more.

This makes corruption difficult to define objectively. Rather, the definition of corruption becomes a series of subjective and sometimes contradictory points of view. This leaves the door wide open for discretion, arbitrariness, populism and other phenomena that may subvert any attempt to combat corruption right from the outset.

To address this problem, contemporary scholars in the field of anti-corruption have approached the issue differently. The trend since the 1990s links corruption to the exercise of power, at all levels of both public and private sectors. Further, power is not limited to political leaders, but includes anyone to whom the law grants the authority to make decisions on behalf of others. In this context, one solitary act or omission is not considered corruption, except when someone abuses power entrusted to them with the aim of benefiting themselves or someone close to them, contrary to the stated purpose for which that power was endowed.<sup>22</sup> Along these lines, Transparency International's working definition for corruption is "the abuse of entrusted power for private gain."<sup>23</sup>

Nevertheless, universal agreement on one definition has not been possible despite countless attempts. This is apparent in the United Nations Convention Against Corruption (UNCAC), which instead of listing one definition for corruption includes a set of practices that States agreed to criminalize within the framework of the Convention. These are:

- bribery of national public officials (Article 15);
- embezzlement, misappropriation or other diversion of property by a public official (Article 17);
- trading in influence (Article 18), abuse of functions (Article 19);
- illicit enrichment (Article 20), bribery in the private sector (Article 21);
- embezzlement of property in the private sector (Article 22);
- laundering of proceeds of crime (Article 23);
- concealment (Article 24);
- obstruction of justice (Article 25); and
- liability of legal persons (Article 26).

But corruption crimes are not exclusively limited to these. The Convention encourages State Parties to expand the criminalization of corruption according to national contexts. Some countries indeed expanded the list of criminally corrupt activities based on their specific contexts, while others used the activities listed in the UNCAC.

For its part, the Lebanese legislature has adopted a specific definition of corruption: "the abuse of power, function or job in connection with public assets for the purpose of generating illicit profits or advantages for personal benefit or for the benefit of third parties whether directly or indirectly."<sup>24</sup> This definition is consistent with a number of practices criminalized

<sup>22</sup>. United Nations Development Programme. 2018. Conceptual Framework. Corruption Risk Assessment at Sectoral Level.

<sup>23</sup>. Robert Williams. 2000. Explaining Corruption. See also, OECD. 2008. Corruption- A Glossary of International Standards in Criminal Law.

<sup>24</sup>. Article 1, paragraph 1 of the Anti-Corruption Law in the Public Sector and the establishment of the National Anti-Corruption Institution.



by Lebanese laws, including but not limited to crimes mentioned in Chapter I, Section III of the Penal Code like bribery, trade in influence, embezzlement, abuse of function, illicit enrichment according to Law No. 154 of 1999, money laundering according to Law No. 44 of 2015, and the crimes included in the Whistleblowers' Protection Law No. 83 of 2018.

Further, within the scope of efforts to establish a national legal anti-corruption system, the legislature expanded the concept of "public official", compared to that laid out in the Penal Code<sup>25</sup> and the Public Officials Regulations document<sup>26</sup>. The legislature defines a public official as "anyone holding a legislative, judicial, executive, administrative, military, security or advisory position, whether appointed or elected, permanently or temporarily, with or without pay, and any person performing a public function, including any position of constitutional authority or public function or service, or performing any work for the benefit of a public facility, public utility, public institution, or public interest, or in favor of a public establishment or facility, whether assuming this position legally or by way of practice."<sup>27</sup> This is consistent with the definition of "public official" as stated in the UNCAC, Article 2(1).

## • General Overview

As we've seen, corruption is a complex problem that can not only take multiple forms, such as bribery and embezzlement, but is also often interconnected with various other crimes, such as fraud, deception, theft, abuse of power, misuse of power, tax evasion and money laundering.<sup>28</sup> Corruption exists in both public and private sectors, and in all aspects of life, with no exception.

Before setting out a strategy to combat this scourge, it's necessary to understand how corruption comes about. Thorough diagnosis is the first step to finding an efficient treatment and cure.

But identifying the reasons behind corruption is not a simple task. Not only are they diverse and numerous, they vary from one society or state to another, according to their values, regimes, customs and traditions, as well as political, economic and security conditions. A final factor is the adequacy of a state's legal system, as well as the efficiency of the institutions mandated to enforce it.

In Lebanon, the majority of citizens believe, rightly or wrongly, that a large percentage of public sector employees is corrupt.<sup>29</sup> Studies and opinion polls show that corruption affects almost all sectors of life, both public and private. To what exact degree is difficult to determine because of a lack of reliable data. According to a 2016 report by the Arab Barometer, 44% of Lebanese people consider corruption one of the main problems affecting the economy. According to a 2019 report by the Arab Barometer, only 28% of Lebanese citizens believe the government is cracking down on corruption. What's more, 91% say that corruption is found within state institutions to a large or medium extent, and only 20% trust the government, parliament, and the judiciary system.


25. Lebanon Penal Code, Decree Law no. 340 dated 1/3/1943 and its amendments.

26. Public officials Regulations, Decree Law no. 112 dated 12/6/1959 and its amendments.

27. Article 1(d) of the Whistleblowers' Protection Law No. 83 of 2018.

28. The National Assessment of the Risks of Money Laundering and Terrorist Financing (2019) included corruption among high-risk money laundering crimes

29. Arab Barometer V. November 2019. Lebanon Country Report. Huseyin Ceyhoun. 2016. Lebanon: Five Years after the Arab Uprisings, Findings from the Arab Barometer. Wave 4 Lebanon Country Report. Transparency International. 2016. People and Corruption: Middle East and North Africa Survey. Sami Atallah, Lebanese Center for Policy Studies. September 2012. Arab Barometer II, Lebanon Country Report.



Generally, corruption thrives where public money is concentrated. In Lebanon, public procurement, the granting of licenses for business activities and collection of all kinds of taxes and fees are the areas where corruption is concentrated. However, as we've seen, corruption is not necessarily limited to financial exchange; it can also be found in administrative and political transactions. Administrative corruption impacts access to and quality of public services, thus contributing to waste in public money. At the political level, corrupt individuals might take advantage of their authority to sway supposedly independent state bodies, or influence the regulation of the public and private sectors, and the relationships between them. Corrupt individuals might pass legislation or other decisions that legitimize and protect their corrupt practices.

Since the end of the Lebanese Civil War in the early 1990s, the procurement for public works contracts and public supply contracts issued by public administrations, public institutions and major municipalities has been one of the areas most vulnerable to corruption. Especially affected are sectors where oversight is limited and spending is high and frequent, for example electricity and public works.<sup>30</sup> The risk of corruption is also high in public revenue collection (taxes, customs and real estate fees) as well as in public services like healthcare, social security, safety, personal status, and court services.<sup>31</sup> This underscores the fact that while financial, administrative, and political transactions in Lebanon are especially prone to corruption, it also seriously affects the quality of people's lives, especially those with limited income.

Lebanon's reputation abroad is also impacted by the taint of corruption. Lebanon scored 28 points out of 100 on Transparency International's Corruption Perceptions Index (CPI).<sup>32</sup> This score is not only lower than the global average of 43; it's also lower than the average in the Arab world of 34.5 points. Lebanon ranked 137th out of 180 countries. Lebanon also scores low on the World Bank's "Control of Corruption" index,<sup>33</sup> as well as in the Global Competitiveness Report issued by the World Economic Forum (WEF). The report shows that the rate of bribery and number of unofficial payments is higher than both regional and international levels. The WEF report also highlights significant lack of transparency of government policymaking, weak judicial independence and an almost complete lack of public trust in politicians.<sup>34</sup>

<sup>30</sup>. Daniel Sanchez. The Lebanese Center for Policy Studies. 2018. Combating Corruption, a Necessary Step toward Improving Infrastructure. Reinoud Leenders. 2012. Spoils of Truce: Corruption and State-Building in Postwar Lebanon. Charles Adwan. 2004. Corruption in Reconstruction: The Cost of 'National Consensus' in Post-War Lebanon.

<sup>31</sup>. Transparency International. 2016. People and Corruption: Middle East and North Africa Survey. Global Corruption Barometer.

<sup>32</sup>. Transparency International. Lebanon score. Corruption Perceptions Index 2019.

<sup>33</sup>. World Bank. Lebanon Score. Control of Corruption Index 2018.

<sup>34</sup>. World Economic Forum. Lebanon Score. The Global Competitiveness Report 2019.



## • Influencing Factors

Corruption spreads or contracts depending on a variety of factors. Of course, no country, people, or society is either totally honest or totally corrupt. Individuals, whether public officials or not, men or women, religious or non-religious, and of any age, color, or belief, are exposed to all kinds of temptations, and find various justifications to engage in corrupt practices.<sup>35</sup> What's more, there is no causal relationship between a state's wealth and its integrity, nor between the presence of democracy and the absence of corruption. Rather, there is an inverse relationship between factors that contribute to the spread of corruption and efforts made to control them. Put simply, when an effort is made to control corruption, corruption declines; when efforts are suppressed, corruption increases.

In light of what appears to be national consensus on the existence of high levels of corruption in Lebanon, it is necessary to explore the key influencing factors of corruption. Evaluations, research and consultations show various overlapping factors. Some factors appear to be historical: for one thing, the legacy of the Ottoman Empire has been politically and economically influential since the declaration of the State of Greater Lebanon in 1920, throughout the French Mandate and the multiple subsequent stages of the Lebanese Republic independence in 1943. Further, a complex web of power alliances played out regionally as well as in Lebanon during the civil war, in the post-Taif period beginning in 1990, after liberation in 2000, and subsequently.

In this highly complex geopolitical context, prone to factional considerations and subjective interpretations, the National Anti-Corruption Strategy focuses on the factors with a direct impact on the current reality of corruption in Lebanon in the scientific sense of the word. The Strategy also takes into account the efforts made in recent years to control corruption and reduce its impact.

The factors that affect corruption in Lebanon are political, economic, social, legislative and institutional, with sectarianism as a common denominator. From an anti-corruption perspective, the challenge posed by sectarianism is not about the factional diversity that characterizes Lebanon, nor the feeling of strong affiliation that most Lebanese have for their sects, nor to the desire of the sects to be represented in the country's ruling system. All of this constitutes an added value for Lebanon, and makes it a unique model of cultural diversity, civil peace and coexistence at a time when the region and the world are witnessing dangerous factional conflicts and the emergence of isolationism and hostile tendencies towards the "other."

35. Kendra Dupuy and Siri Neset U4. 2018. The cognitive psychology of corruption. Micro-level explanations for unethical behavior.





## a) Political Factors

Political factors are related to the formation of the political authority in the country and how it exercises its role. Three prominent political factors affect corruption in Lebanon. The first is the weak political will of the successive governments since the 1990s to fight corruption. This has delayed the state's engagement in concentrated reforms in this field, and allowed corruption to become more prevalent and an accepted part of the political landscape, used to gain loyalty, expand influence, and ensure a piece of the pie in the state's institutions and projects. The second factor is that political sectarianism gives primacy to sectarian considerations in decisions regarding the public administration and money. The third factor is the failure to complete electoral reform that could achieve accurate representation and enhance politicians' accountability to citizens and each other in accordance with the principles of democracy.

In recent years, there have been positive steps to address some of these political factors. The most important of these is perhaps enhanced political will to fight corruption. This has become a national priority and has translated into unprecedented official commitments. This positive development is reflected in President Michel Aoun's inaugural address in 2016, Prime Minister Saad El-Din Al-Hariri's ministerial statements of the 2016 and 2019 governments, Prime Minister Hassan Diab's ministerial statement of the 2020 government, the cumulative work of the Ministerial Anti-Corruption Committee and its supporting Technical Committee in successive governments since 2011, and finally, parliament's legislative and oversight actions including the enactment of specialized legislations in 2015, 2017, 2018, 2019 and 2020, and the adoption of the country's budgets in 2017, 2018 and 2019 after a 12-year hiatus. In this new phase, political parties, through their ministers and members of parliament, have explicitly articulated anti-corruption concrete actions. Significantly, these parties had never before agreed to fight corruption, and anti-corruption efforts have never been part of their political discourse.


Nevertheless, political will still needs to be strengthened, and translated into tangible reforms that is palpable to citizens. Without strong political will to fight corruption, Lebanon will not be able to develop and implement the necessary anti-corruption public policies, and corruption will remain an accepted means for political competition.

Another step to mitigate political factors that contribute to corruption has been the enactment and implementation of the new electoral law of 2018. This improved representation by partially adopting the principle of proportional representation, with the goal of strengthening the relationship between voters and elected representatives based on the sense of citizenship. But this progress, however important, is still not enough. The national debate – on which further steps could achieve better political representation and democratic accountability – is ongoing. It's clear, though, that electoral reform must be coupled with reforms to enhance public engagement in policy making on all levels. This is especially true given current deficiencies in the transparency of government policymaking, according to that Lebanon's lower-than-average transparency score in the Global Competitiveness Report.<sup>36</sup>

Finally, sectarianism remains a political factor hindering the fight against corruption. There is general reluctance to initiate a mechanism aimed to abolish political sectarianism, despite

<sup>36</sup> Lebanon scored 3.1 points on the World Bank's Transparency of Government Policymaking Index for 2017-2018; i.e. below the global average of 4.15 points and the regional average of 3.94 points.





it being a principle enshrined nearly thirty years ago in the Lebanese constitution. Clearly, ongoing political sectarianism influences the priorities of the various political powers, and prevents political parties from performing proper oversight and prosecution duties.

## **b) Economic Factors**

Economic factors are ones associated with the production, distribution, exchange and consumption of goods and services. Two main economic factors affect corruption in Lebanon. The first lies in the difficulty of doing business<sup>37</sup> and weak economic competitiveness<sup>38</sup> which can cause investors and private sector entities alike to resort to corruption as a means both to facilitate their daily business with government departments, and also to build relationships with decision makers to secure their market shares. The second factor relates to Lebanon's economic model, which has failed to foster sustainable development and has contributed to the worst economic crisis in Lebanon's recent history. The economic model has also contributed to a deterioration of public services and high rates of unemployment and poverty, undermined purchasing power, and increased the burden of taxes and fees which has itself contributed to the spread of corruption. To illustrate this point, when Lebanese citizens saw the economic opportunities available to them shrinking, they felt compelled to resort to bribery, *wasta* (connections) and favoritism to obtain jobs, establish business enterprises and secure basic needs. According to the 2019 Arab Barometer, nearly 95% of Lebanese people say it is necessary to have *wasta* to obtain employment, and 76% think they have to pay a bribe to benefit from public services.<sup>39</sup> These two economic factors have undermined citizens' trust in the state and increased their feeling of inequality, which increases the likelihood that they will neglect their duties, violate laws and regulations, and resort to corruption to achieve personal benefits that are contrary to the public interest.

Despite recent initiatives to enhance economic competitiveness – including a draft law on competitiveness and various tax and customs reforms – as well as governmental efforts to improve Lebanon's economic situation, the desired progress has not been achieved. On the contrary, Lebanon is facing an unprecedented economic crisis with a severe financial crunch. Official figures shared by the government show that production decreased by 6.9% in 2019 compared to 1.9% in 2018, with an expected additional decline by around 14% by the end of 2020. This is exacerbated by the shortage of USD. The economic contraction has heavily burdened non-oil imports and depressed consumer demand, while prices of consumables skyrocket, business volume shrinks and the inflation rate soars.


## **c) Social Factors**

Social factors are the relationships citizens have with each other and with the state, the values that govern these relationships and the behaviors that result. Generally speaking, there are two main social factors that affect corruption in Lebanon. The first is the prioritization of personal interests over any other considerations while dealing with the government. The second is the prioritization of factional affiliation over national affiliation. These two factors are closely related to the political and economic factors as previously discussed.

<sup>37</sup>. Lebanon scored 54.3 points on the World Bank's Ease of Doing Business Index in the year 2020, which ranges from zero to 100, and ranks 143rd out of 190 countries.

<sup>38</sup>. Lebanon scored 56.3 on the World Economic Forum's Global Competitiveness Index in 2019, which ranges from zero to 100, and ranks 88th out of 141 countries.

<sup>39</sup>. Arab Barometer V. November 2019. Lebanon Country Report



Gaining unlawful personal benefits has become an accepted practice in society, undermining the value system and contributing to a culture that normalizes corrupt behavior. What's more, people's prioritization of sectarian, political, regional, and familial affiliations over national affiliation undermines solidarity and damages the unified national will to fight corruption. As we've seen, a large percentage of Lebanese citizens do not have positive attitudes towards the state and its institutions. Lebanese people perceive the public administration negatively: they point to it as the main body of corruption that drains their money through taxes without providing any quality services in return. As a result, citizens tend to violate laws and override rulings, not only to circumvent cumbersome restrictions, but also to preserve their financial resources and punish the state they see as exploitative.

Given a culture in which individual interests prevail, there is a general lack of social awareness of the negative consequences of corruption. Until now, people have tended to accept corruption practices, and sometimes even considered them legitimate means to increase social status, without considering whether the act in question is right or wrong.<sup>40</sup>

Social elites have long sought to draw attention to and address these problems. However, despite several initiatives, including in the late 1990s and in 2015, the movement toward anti-corruption has never turned into a purposeful and organized popular movement until the October 17, 2019 uprising. This uprising set the foundation for a new phase of the relationship between the citizens and the state. One of the most prominent developments in this field is perhaps the media's increased role in highlighting cases of corruption and exerting pressure against it, including through social media. However, the impact of the media remains limited and is presently unable to significantly reduce the influence of social factors. This is perhaps because there hasn't been sufficient time to gauge the media's influence, or perhaps because media polarization continues to reflect political polarization in Lebanon.

#### **d) Legislative Factors**

Legislative factors refer to the integrity and efficacy of the legislative anti-corruption system. There are two main legislative factors that affect corruption in Lebanon. The first one is ineffective implementation of existing legislation, and the second are major legislative gaps which must be addressed.

A set of laws directly relevant to the fight against corruption were enacted in recent years. These include the Anti-Corruption Law in the Public Sector, the establishment of the National Anti-Corruption Institution, legal efforts to implement the UNCAC obligations, as well as other legal provisions to enhance the efficiency of criminal prosecution. This new set of legislation was preceded by the Right of Access to Information Law No. 28 of February 10, 2017, considered the most solemn legal commitment to transparency currently on the books in Lebanon. This set of legislation – together with the Whistleblowers' Protection Law No. 83 and the Law on Transparency in the Oil and Gas Sector, both of October 18, 2018 – constitutes a qualitative leap forward in the process of achieving the National Anti-Corruption Strategy Objectives.

<sup>40</sup> Dr. Randa Antoun. The Lebanese Transparency Association and the United Nations Development Programme. 2009. Towards a National Anti-Corruption Strategy.



Other notable s indirectly related to fighting corruption include the following:


- the Ombudsman Law No. 664 of February 4, 2005;
- Law No. 32 of October 16, 2008, which expands the mandate of the Special Investigation Commission;
- Law No. 27 on the Agreement for the Establishment of the International Anti-Corruption Academy of November 24, 2015;
- the Fighting Money Laundering and Terrorist Financing Law No. 44 of November 24, 2015, which listed corruption among the original crimes of money laundering, in line with the international standards;
- Law No. 53 of November 24, 2015 authorizing the Lebanese government to accede to the 1991 International Convention for the Suppression of the Financing of Terrorism;
- Law No.55 of October 27, 2016 on the Exchange of Information for Tax Purpose;
- the Electoral Law No. 44 of June 17, 2017;
- Law No. 48 Regulating Public-Private Partnership of September 7, 2017;
- the e-Transactions and Data Protection Law No. 81 of October 10, 2018; and
- the Law on Declaring the Cross-Border Transportation of Money No. 42 of November 24, 2015.

There is also a robust set of specialized anti-corruption draft laws and legislation, and other laws with provisions concerning asset declaration, combating illicit enrichment, banning conflict of interests, establishing an e-government, reforming public procurement, recovering stolen public assets, determining the appointment mechanism of first category and senior positions in public administrations, and lifting the judicial immunity of members of Parliament and ministers.

## **e) Institutional Factors**

Institutional factors refer to decisions taken by the executive authority and public administration in general, as well as to the administrative, oversight and judicial practices of the relevant state bodies in the process of of their duties. There are four main institutional factors that affect corruption in Lebanon.

The first is the simple fact that the Lebanese legislation that regulates public administration dates back to 1959. The failure to periodically update this structure has deprived the public service of its ability to exercise its basic function, which is regularly responding to the needs of the public. As the public sector has weakened, the private sector has become more sophisticated and able to offer better and faster services. To expedite their dealings with public institutions, citizens must resort to various legal and illegal means to get the service they are accustomed to in the private sector. The situation has become a breeding ground for corruption, turning otherwise normal routines into illicit dealings between citizens and public employees. A simple transaction in a public administration must go through many different departments and divisions due to overlapping practices and procedures; employees may seek financial gain by taking payment from a citizen eager to have paperwork expedited as fast as possible.



Lebanon's antiquated administrative procedures are exemplified by complex bureaucracy – red tape – which has significantly contributed to the spread of corruption, as public employees seek to abuse their position for private gain. As discussed, the long transaction processes and the fact that most public employees are not endowed with the power to simplify complex procedures on a case-by-case basis compel citizens to employ corruption measures in order to obtain efficient public services. What's more, frequently public officials are not trained to handle citizens' needs in a professional manner, and there are few or no channels for addressing potential conflicts, like ombudsmen or administrative reviews. These factors add to the corruption in public administrations. The failure to implement an e-government platform and the lack of information technology and communication systems between the various public administration institutions have only added to the problem.

Lebanese law stipulates that the following oversight and disciplinary bodies are responsible for monitoring public administrative and financial performance: the Civil Service Board, Central Inspection, the Court of Accounts, and the Higher Disciplinary Board. But since their establishment, circumstances have prevented these bodies from conducting adequate oversight over public institutions' administrative performance. The most important of these circumstances is perhaps the government's failure to develop laws in accordance with international standards used for similar bodies that would empower these bodies from carrying out their managerial duties. Another obstacle is the lack of human and financial resources, and modern means to enable these bodies to perform their duties. Finally, poor coordination and political interference have limited their effectiveness in fighting corruption in public administration.

Low wages and salaries add to the problem. Despite a public salary scale adjustment in 2018, twenty years overdue, low salaries continue to contribute to corruption. Current salaries fail to take into account the true cost of living; there is also a lack of any mechanism for periodic salary increases to ensure a decent livelihood for public sector employees. Further, salaries and wages among public administration employees are unfairly distributed due to a differential in contractual formulas with the administration. Disparities have been recorded between and within various institutions and departments.

Another problem is the failure to peg an employee's salary or wage to the employee's actual performance. Regulations governing public careers in Lebanon currently do not provide for such a condition. They have become outdated and are incompatible with the current global advancements, particularly in comparison with private institutions, where employees are rewarded for their performance and sense of initiative. Long-stagnant salaries and wages are out of date. Remuneration schemes should be introduced that reflect an employee's actual performance within their administration.

A third institutional factor, complementary to the previous two, is the faulty nature of the appointment and promotion system in the public service. Laws enshrine a process for staff recruitment and filling vacant positions, but the reality is starkly different. Any appointment or recruitment in any category (fourth, third, second, and first) is often inconceivable without consulting a quota formula dictated by political, religious and administrative interferences. The government has perpetuated this by informally putting a commissioning concept in place. According to this commissioning concept, which has no legal grounds, any individual can be assigned to a vacant position based on favoritism, whether or not they are qualified



for the role. This practice is an example of the proliferation of administrative corruption: the majority of vacant positions in public administration are filled this way. The process for promotion is similarly flawed, and in need of overhaul.

A lack of mobility within the public administration and institutions has exacerbated the problem of corruption. Employees tend to become owners of the positions they hold, exploiting them as they wish. This frequently becomes a part of their daily interactions with citizens and other parties.

A final institutional factor is the inability on the part of the oversight and judicial bodies to adequately detect and prosecute corruption. This is evidenced by the small number of corruption cases heard by the courts, and the even smaller number of convictions, according to the available data included in the annexes to this document.

In recent years, the state has had some success in addressing these institutional factors. For instance, it has:

- simplified procedures in some ministries;
- launched electronic services related to tax and real estate transactions and the one-stop shop systems;
- referred some public procurement operations to the Tenders Administration;
- developed standard bidding documents;
- restructured some ministries;
- set up mechanisms to construct model government buildings;
- launched job description projects and institutional performance assessment systems;
- and
- automated the procedures within some courts, ministries, and other institutions.

In addition, the Council of Ministers issued Decision No. 9 in May 2017, approving the report of the Ministerial Committee established pursuant to Decision No. 59 of 2016 to study the adoption by the Council of Ministers of the mutual consent agreement method and prepare and submit appropriate proposals to the Council of Ministers. The Council of Ministers also approved Decision No. 12 on April 12, 2010, establishing a mechanism for appointing first and second category employees. A number of other decisions seek to hold judicial employees and appointees, like judges, lawyers, judicial assistants, and police officers, accountable for their actions, with consequences including suspension. Finally, decisions have been made to launch criminal prosecutions against and arrest a number of people who embezzled public funds. These efforts frequently include international cooperation, especially in the recovery of stolen funds.



## Part II: Elements of the Strategy

The first part of the Strategy analyzes the reality of corruption and anti-corruption efforts currently at work in Lebanon. Using this as a foundation, the second part lays out the elements of the Strategy. These include the Strategy's Vision, Mission, and the three main Objectives of the Strategy. Further, the targeted results consist of seven Outcomes, divided into thirty-four Outputs, formulated in accordance with the Results-Based Management principles and presented in detail in the Implementation Framework Matrix attached herein.

### • The Vision and the Mission

Lebanon's political leaders have never reached such a clear consensus on combating corruption until recent years. This has been a result of societal demands that the issue be addressed, especially in light of major challenges facing the country in a context of increasing regional and international instability. Further, a new conviction has emerged, both internally and among Lebanon's partners, that any economic recovery and quality of life improvement cannot be achieved without a real commitment to fighting corruption. To effectively fight corruption, it must be a national goal that everyone has the responsibility to work toward. Anti-corruption efforts can also be a means to reaching sustainable development, based on an ambitious Vision and a clear Mission, with specific Objectives that contribute to achieving concrete progress.

First, the National Anti-Corruption Strategy's Vision has been formulated to express the aspirations of the Lebanese people, both in Lebanon and abroad, to build a prosperous society with sustainable development standards, and a democratic country embracing the principles of good governance. The implementation of this ambitious Vision requires constant attention at various levels, especially when it comes to combating corruption, a prerequisite for prosperity. This correlates to the government's Vision for Stabilization, Growth, and Employment,<sup>41</sup> whose third pillar paints the fight against corruption as the most vital structural reform. Corruption is the very antithesis of the rule of law and values of integrity, and thus a major obstacle to building a state capable of achieving development, high quality, and modernity. The Strategy's Vision envisages the future of Lebanon after the success of anti-corruption efforts; the Vision will be a driver for the various other strategies seeking to elevate the country to the ranks of leading nations.

Alternatively, the Mission lays out the specific goal that the National Anti-Corruption Strategy seeks to achieve, meant to contribute directly to the accomplishment of the Vision. It also sets the general orientation of the Strategy, balanced between inclusiveness and specialization. Because corruption impacts public assets and the general public good, the Mission seeks to provide a broad platform of action to address the issue. Further, the Mission establishes that by addressing this issue, it's possible to safeguard citizens' rights and access to decent livelihood opportunities. Finally, the Mission emphasizes the need for the highest possible level of cooperation, coordination, and engagement between the concerned parties.

<sup>41</sup> The Lebanese government's Vision for Stabilization, Growth and Employment. Economic Conference for Development through Reforms with the Private sector (CEDRE). April 2018.

## The Vision

A prosperous society where the rule of law and integrity prevail; and a democratic, fair, and transparent state that manages the affairs of the country and invests its resources in a way that meets the requirements of development, quality, and modernity.

## The Mission

To protect public funds and public affairs from corruption, to safeguard the rights of citizens and provide them with a decent livelihood through the concerted efforts of the legislative, executive, and judicial authorities and with the participation of public administrations, institutions, municipalities, trade unions, civil society, the private sector, and the media.

## The Objectives

- 1) Enhancing Transparency
- 2) Activating Accountability
- 3) Ending Impunity

### • The Objectives

The Mission reflects the three major Objectives that the National Anti-Corruption Strategy aims to achieve. They are the main pillars of the anti-corruption system in Lebanon: enhancing transparency, activating accountability, and ending impunity. These three Objectives are in line with Lebanon's obligations under the UNCAC, as well as Sustainable Development Goal 16: Peace, Justice and Strong Institutions, as shown in the discussion of each Outcome.

Achieving the Objectives will contribute to establishing the rule of law, ensuring equality of the rights and duties of all citizens, optimizing the use and preservation of domestic resources, enhancing economic competitiveness and sustainable development, attracting investment, ensuring equal opportunity, reducing poverty and unemployment, protecting national security, and promoting trust between citizens and the government.

All of this will help improve Lebanon's ranking in international indicators, as well as its ability to engage in regional and international efforts towards the achievement of the Mission through the implementation of the Vision. Together, these are aimed at building a prosperous society with sustainable development standards and a democratic country embracing the principles of good governance.





## I – Enhancing transparency

‘Transparency’ implies openness, clarity, and unambiguousness. Transparency is a principle to which both public and private sectors should adhere, albeit in different ways. Practically speaking, transparency means making information available to the public, i.e. citizens or foreigners who wish to learn about the work of public authorities. There are minor exceptions to this that allow for the withholding of certain information but this should be limited to a minimum, and should not be applied to matters of public interest and public assets. Generally, the more transparency there is, the narrower the margin of corruption is and vice versa: chaos, secrecy, and information concealment facilitate corruption and make it harder to detect.


As described in Part I, Lebanon has achieved some progress in this field in the recent years. In the hope of achieving even more progress, the National Anti-Corruption Strategy has identified enhancing transparency as a primary Objective, for the significant role it plays in increasing public trust in both the state and the private sector, and its role as a catalyst for accountability, integrity protection, and eradicating corruption. Greater transparency will be achieved via the pursuit of seven Outcomes: through the completion and implementation of specialized legislations (Outcome 1); achievement of integrity in public functions (Outcome 2), public procurement (Outcome 3); judicial system (Outcome 4), and oversight bodies (Outcome 5); taking into account the necessary controls; giving due consideration to the role of society in fighting corruption (Outcome 6); and turning the transparency principle into specific policies and practices in all sectors according to the respective characteristics of each, including the private sector (Outcome 7).

These goals are in line with the three purposes of the UNCAC which Lebanon has committed to implement. Transparency is particularly relevant to the first and third of these purposes. First, given that transparency is a prerequisite for preventing and combating corruption, enhanced transparency would align well with the UNCAC’s first purpose: to “promote and strengthen measures to prevent and combat corruption more efficiently and effectively.” Further, the UNCAC’s third purpose – to “promote integrity, accountability, and proper management of public affairs and public property” – is impossible to achieve in non-transparent environments where information can be easily withheld and manipulated, responsibilities evaded and decision-making regarding matters of public money and public affairs distorted.

Moreover, the first Objective of the Strategy is in line with the UN’s Sustainable Development Goals. Especially relevant are the following:

- the sixth target of the sixteenth goal which calls on states to “develop effective, accountable, and transparent institutions at all levels” (16.6);
- the tenth target of the sixteenth goal is related to ensuring “public access to information...” (16.10); and
- the fourth target of the sixteenth goal, especially related to significantly reducing “illicit financial flows...” (16.4), suggests that the public and private sectors-including the financial and banking institutions-must be included within the principle of transparency.






The first Objective of this Strategy, to enhance transparency, is also in line with the adherence requirements of international initiatives such as the Open Government Partnership (OGP) and the Extractive Industries Transparency Initiative (EITI), in addition to many regional and international recommendations including those issued by the ACINET, the Financial Action Task Force (FATF), the Organization for Economic Co-operation and Development (OECD), the Group of Twenty (G20), and the 2016 Anti-Corruption Summit in London.

## **II – Activating accountability**

Accountability is a complex concept, and an integrated system. Developing such a system of accountability initially requires identifying responsibilities and enabling the concerned parties to undertake them, in both the public and private sectors. This process involves two main stages: (1) Answerability, or mechanisms by which someone understands their area of responsibility, and to whom they report; and (2) Enforcement, or mechanisms used to determine whether there has been improper behavior, how to address it, and how to penalize it, if necessary. Practically speaking, accountability is not limited to acts of corruption. Rather, it extends to all types of omission, negligence, and other crimes, and requires fair and effective answerability and enforcement mechanisms, including political, administrative, financial, oversight, judicial, and even social mechanisms (in the form of so-called social accountability). Accountability becomes even more difficult when related to corruption cases due to their secrecy and complexity, as well as their frequent connection to influence networks. Generally, particular obstacles to accountability with regards to acts of corruption can include the misuse of bank secrecy, and constitutional and legal immunity, especially in cases where there is a lack of sufficient mechanisms to overcome them and an absence of specialized agencies and bodies.

Lebanon already has the legal system necessary to hold accountable perpetrators of corruption, their partners and those involved with them, including the legal persons of private law. The country's public administration, judicial sector, and oversight bodies include many professionals and experts able to activate these laws. In order to fully mobilize existing laws and competencies, as well as develop them further to address their deficiencies, the National Anti-Corruption Strategy has identified activating accountability as its second Objective. This Objective supports the establishment of the rule of law, improvement of individual and institutional performance, implementation of principles of reward and punishment, protection of integrity, and the fight against corruption. This second Objective will be translated into tangible results via the pursuit of seven Outcomes: the completion and activation of specialized legislations (Outcome 1); the incorporation of more effective mechanisms for answerability and enforcement in the public function (Outcome 2) and public procurement (Outcome 3); support for all components of the judicial system (Outcome 4) and oversight bodies (Outcome 5) according to their respective roles, so as to foster accountability away from undue influence, while providing support to enable the community to fulfill its role, including in terms of social accountability (Outcome 6); and finally through the translation of the accountability principle into specific policies and practices in all sectors, including the private sector (Outcome 7).



These Outcomes are in line with the three purposes of the UNCAC which Lebanon has committed to implementing. Especially relevant is the first purpose – to “promote and strengthen measures to prevent and combat corruption more efficiently and effectively” – because greater accountability mechanisms clearly contributes to these aims. The Outcomes of the second Objective are also clearly in line with the third purpose of the convention: to “promote integrity, accountability, and proper management of public affairs and public property.” Finally, the second Objective of the Strategy is in line with the UN’s Sustainable Development Goals, namely the fifth target of the sixteenth goal which calls on states to “significantly reduce corruption and bribery in all their forms” (16.5) and the sixth target of the sixteenth goal related to “developing effective, accountable and transparent institutions at all levels” (16.6).

### III – Ending impunity

Impunity is the most serious consequence of the lack of rule of law. It is an extremely dangerous phenomenon that threatens the security and stability of societies, in particular when it has become common practice and part of the prevailing culture. Impunity can cause people to resort to the law of the jungle, and further, can erode the social contract at the foundation of the state which governs the relationship among citizens, and between citizens and the government. As history has shown, impunity can even result in wars and conflict, the collapse of entire states and regimes, as well as regional destabilization. Accordingly, impunity is considered a serious threat to international peace and security, as well as to any efforts towards sustainable development. This is especially true for corruption crimes,<sup>42</sup> major corruption crimes in particular,<sup>43</sup> due to their role in encouraging and facilitating the perpetration of other crimes. These can include all types of smuggling, terrorism and human trafficking, and various practices associated with organized crime.<sup>44</sup> Preventing impunity in corruption crimes, including the punishment of corrupt people and recovery of stolen assets, regardless of their status, can help guarantee equality before the law. As such, preventing impunity is considered evidence of the seriousness of anti-corruption efforts, and a key element of social security and stability.

This document has shown that the majority of citizens believe that the state fails to impose the law. Further, the majority of citizens believe that impunity has become the rule rather than the exception, especially when it comes to corruption crimes involving people with authority, or others close to them. This appears to be consistent with the international indicators on the rule of law, fighting corruption, and citizens’ trust in the state and the politicians. Citizens’ mistrust in the state also coincides with the accumulation of deficiencies in Lebanon’s economic model, and with the deteriorating relationship between the state and the citizens, which has led to the emergence of loose social values and behaviors tolerant of corruption. Frequently, people justify corruption – calling it “shatara” (cleverness) – thereby promoting clientelism which protects corrupt people and allows them to escape punishment. The low number of prosecutions and convictions in corruption cases, despite the proliferation of traditional and social media that highlighting instances of corruption, points to insufficient follow up.

<sup>42</sup>. United Nations. 8346th Security Council Meeting: Maintenance of International Peace and Security. September 10, 2018.

<sup>43</sup>. United Nations Office on Drugs and Crime. Lima, Peru. 3-5 December 2018. Concept Note. Global Expert Group Meeting on Corruption involving Vast Quantities of Assets.

<sup>44</sup>. Center for the Study of Democracy. 2010. Examining the Links between Organized Crime and Corruption.



The National Anti-Corruption Strategy has identified the prevention of impunity as its third Objective to help restore trust in the state, initiate action, and create the conditions for a new phase in Lebanon, where equality before the law is upheld within the framework of an integrated system to safeguard integrity and fight corruption. The third Objective will translate into tangible results via the pursuit of seven Outcomes: the passage and activation of specialized legislation (Outcome 1); complementing the ongoing work to enhance the integrity of public functions (Outcome 2); public procurement (Outcome 3); support for each component of the judicial system (Outcome 4) and oversight bodies (Outcome 5). Further, there will be provision for resources and conditions needed to prosecute corrupt high level officials and those involved with them, impose severe punishment, and recover stolen assets. This will be carried out in concert with community-level efforts to address distorted values and behaviors that allow for impunity, working toward preventing it (Outcome 6). The seventh Outcome will address gaps in the policies and practices of each sector, including the private sector, which are used to protect corruption and thus undermine the prestige of the state and the rule of law (Outcome 7).

This Objective is in line with the three purposes of the UNCAC which Lebanon has committed to implementing. Especially relevant is its second purpose, to promote, facilitate, and support “international cooperation and technical assistance in the prevention of and fight against corruption, including asset recovery.” It is also in line with the UN’s Sustainable Development Goals, especially the third target of the sixteenth goal which calls on states to “promote the rule of law at the national and international levels and ensure equal access to justice for all” (16.3) and the fourth target of the sixteenth goal related to strengthening “the recovery and return of stolen assets and [combating] all forms of organized crime” (16.4). Finally, this Objective aligns with the fifth target of the sixteenth goal, related to the substantial reduction of “corruption and bribery in all their forms” (16.5).

## • Targeted results

The three Objectives of the National Anti-Corruption Strategy are reflected in an interconnected network of results that will be implemented between 2020 and 2025. These results consist of seven targeted Outcomes divided into thirty-four targeted Outputs. Each Output has been assigned a timeframe and key responsible parties. These targeted results are formulated according to Results-based Management, and are included in the Implementation Framework Matrix. Progress in their implementation will be measured according to the indicators and methodology shown in the Monitoring and Evaluation Matrix. The two matrices, attached herein, provide the guidance necessary to develop detailed action plans to implement the Strategy.



## **Outcome 1:**

### **Specialized Anti-Corruption Legislation Completed in Accordance with International Standards and better Implemented**

The first Outcome of the National Anti-Corruption Strategy aims to facilitate the drafting and application of specialized anti-corruption legislation, as called for by the UNCAC which is the most comprehensive and legally binding framework on all States Party to the Convention, including Lebanon. This Outcome includes support for the implementation of laws that have been enacted, for example, through the promulgation of the necessary application decrees and decisions, the development of training and awareness programs, and other tools that ensure the proper application of the laws. The first Outcome also seeks to re-focus attention on legislative bills and draft laws that have been developed but not yet enacted, with the goal of passing and enforcing the laws as soon as possible. Additionally, this Outcome includes support for the development of other legal provisions to complete a specialized anti-corruption legislative system, provides necessary support to the authorities in finalizing these provisions in a participatory manner drawing on international expertise and comparative experience, and then provides support their effective implementation. After the specialized anti-corruption laws have been enacted and implemented, the first Outcome will include the establishment and activation of institutional mechanisms to conduct periodic reviews of the laws in terms of their integrity and effectiveness. The legislative framework is dynamic and requires periodic revision according to a number of rubrics. First, legislative bills, draft laws, and even laws in force must be measured using specialized evaluation and diagnostic tools including the UNCAC Compliance Review and Gap Analysis (UNCAC Gap Analysis), Next, the legislative system must be put through the assessments required for Lebanon's participation in new international conventions such as the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. Finally, the Corruption Risk Assessments can help address legislative gaps and shortcomings that allow corruption to continue. This also includes the incorporation of the fight against corruption within the criteria of the Regulatory Impact Assessment. The first Outcome will be achieved through the implementation of seven Outputs:

**Output 1.1: National Anti-Corruption Institution established and activated**

**Output 1.2: An updated and effective system for combating illicit enrichment established and implemented**

**Output 1.3: Whistleblowers' Protection Law effectively implemented**

**Output 1.4: Effective conflict of interest management system established and implemented**

**Output 1.5: Right of Access to Information Law effectively implemented**

**Output 1.6: An effective system for recovering stolen public assets established and implemented**

**Output 1.7: Specialized anti-corruption legislations and their effectiveness periodically assessed and reviewed**

These seven Outputs will be achieved according to a detailed action plan to be developed based on the Areas of Work and Timelines indicated in the Implementation Framework attached herein, and carried out by key responsible parties. The action plan will be revised and updated in light of changes, according to the approved national follow up mechanism on the implementation of the Strategy.



## **Outcome 2:**

### **Higher Levels of Integrity in Public Function Achieved**

The second Outcome of the National Anti-Corruption Strategy is focused on the integrity of public officials. It does not include the general reform of the public service system, as this is a major national project that goes beyond the fight against corruption. Clearly, the implementation of modern human resource management in the public sector, and the creation of a work environment that inspires productivity and where employees are rewarded based on their performance would contribute to combating corruption. However, the fact that such efforts do not currently exist does not justify the prevalence of corruption. Hence, states seeking to enhance public officials' integrity should work to modernize and develop the entire system, which requires more time and resources, while concurrently paying special regard to specialized measures that would limit corruption. This is the intended target of the second Outcome of this Strategy: to eliminate role ambiguity at the institutional and individual levels, and take specialized measures to enhance integrity in accordance with the provisions of the UNCAC and other relevant international principles. The Outcome is directed at all people of public law, and public officials in the broad sense, as well as those who are not subject to the Civil Service Board mandate, including public institutions, ad hoc committees such as the Beirut Port Committee, independent bodies, councils and funds, the Central Bank, the municipalities and their unions, in addition to non-civil corps such as the army, Internal Security Forces, General Security, and State Security. This Outcome requires the adoption of job descriptions according to a comprehensive review of the structures and cadres. Further, the Outcome requires the implementation of necessary legal and procedural measures for the appointment, promotion, training, motivation, assessment, and accountability of employees, and the provision of sufficient means to encourage them to adhere to ethical behavior. In addition, the Outcome includes support, via legislative amendments and training programs, for the Civil Service Board in its role as the main body responsible for public service. Also, the Outcome includes the development of mechanisms and tools for the Board members and employees to carry out their roles. This will be carried out independently from efforts related to the centralization or decentralization of public service administration and public sector human resources, which requires an in-depth review to take the necessary decisions in this regard, The lack of decisions based on careful consideration contributes to a state of chaos that can be used to justify the neglect of the recommendations of the Civil Service Board, thus undermining confidence in the administration and threatening its ability to perform its duties. The second Outcome will be achieved through the implementation of four Outputs:

**Output 2.1: Roles and responsibilities of public officials clearly defined within a modern structure of the overall public sector**

**Output 2.2: Standards of transparency and merit applied and respected in the appointment of employees/interns/volunteers and their transfer, promotion, compensation, and fringe benefits**

**Output 2.3: A modern and integrated system to promote ethical behavior in public administrations, institutions, and municipalities established and implemented**

**Output 2.4: Independence and effectiveness of the Civil Service Board enhanced**

These four Outputs will be achieved according to a detailed action plan to be developed based on the Areas of Work and Timelines indicated in the Implementation Framework attached herein, and carried out by key responsible parties. The action plan will be revised and updated in light of changes, according to the framework of the approved national follow up mechanism on the implementation of the Strategy.



### **Outcome 3:**

## **Public Procurement System Less Vulnerable to Corruption**

The third Outcome of the National Anti-Corruption Strategy pertains to the public procurement system theoretically, regardless of whether it is currently being executed in practice centrally through the Tenders Administration. The Outcome proposes specialized measures that would help make public procurement of all kinds less vulnerable to acts considered crimes under Lebanese law and the UNCAC. As is the case for the previous Outcome related to the integrity of the public service, this Outcome does not incorporate all the changes needed to reform the entire public procurement system in Lebanon. The Strategy complements, but does not replace, the major national project to align Lebanon's public procurement system with international standards, enable it to provide the requirements of balanced development, attract investment, stimulate the economy, and achieve sustainable development. Accordingly, the Outcome will support and contribute to the overall effort to elaborate a clear and unified vision leading to a comprehensive law that governs the oversight and audit of public procurement as per international standards and national need. In parallel, it will work to develop measures to enhance transparency and promote competition in public procurement activities carried out under current laws and regulations. Further, it will support the independence and effectiveness of the Tenders Administration in ending corruption, enhancing oversight, control, and audit of procurement at all stages of the procurement process whether centralized or decentralized, referring directly to the structures responsible for conducting public procurement without the need to refer to the Tenders Administration; building specialized knowledge among employees and management, and providing them with tools and modern technologies such as standard bidding documents and e-procurement; developing and implementing appropriate internal controls, special codes of ethics, and provisions to prevent conflicts of interest; revising the methods by which committees are established and their work organized; and adopting fairer and more effective mechanisms to deal with objections. The third Outcome will be achieved through the implementation of four Outputs:

**Output 3.1: Centralized and decentralized public procurement more transparent and competitive**

**Output 3.2: Clear and effective oversight, control, and auditing mechanisms adopted and implemented at all stages of centralized and decentralized public procurement**

**Output 3.3: Tender administration better able to reduce corruption in public procurement within its mandate**

**Output 3.4: A comprehensive law that fosters public procurement, its oversight and audit as per international standards approved and implemented**

These four Outputs will be achieved via a detailed action plan to be developed based on the Areas of Work and Timelines indicated in the Implementation Framework attached herein, and carried out by key responsible parties. The action plan will be revised and updated in light of changes, according to the framework of the approved national follow up mechanism on the implementation of the Strategy.



## **Outcome 4:**

### **A Judicial System more Impartial and Capable of Fighting Corruption**

In its fourth Outcome, the National Anti-Corruption Strategy places particular focus on the role of the judicial system in fighting corruption. This system is essential to the process of fighting corruption. Its many components – judges, judicial courts, administrative courts, financial courts, and military courts, judicial police assistants, councils, and other departments – perform activities related to detection, prosecution, and deterrence. Further, by fighting corruption in accordance with principles of human rights and the rule of law, these institutions can serve to increase citizens', investors', and the general public's trust in the state. This Outcome respects judicial independence, and supports and builds on recent efforts to develop judicial work. However, it is primarily focused on two complementary fields related to Lebanon's obligations in the framework of the UNCAC. The twelfth article of the UNCAC calls for the reinforcement of the integrity of the judiciary in accordance with international principles, including the Bangalore Principles,<sup>45</sup> and provides for a series of measures aiming for greater effectiveness in the prosecution of corruption crimes, along with relevant legislative and organizational amendments and training programs. The targeted work also includes enhancing the transparency of the courts and their departments – this will reduce the risk of corruption in transactions and enhance the efficacy of the judicial system in the fight against corruption. The fourth Outcome will be achieved through the implementation of four Outputs:

**Output 4.1: Judicial independence Strengthened as per international standards**

**Output 4.2: Integrity of the judiciary reinforced to enhance trust in the judicial power**

**Output 4.3: Work of the courts and their departments is more transparent**

**Output 4.4: Highest levels of legal, procedural, and technical capacities achieved in the prosecution of corruption crimes**

These four Outputs will be achieved according to a detailed action plan to be developed based on the Areas of Work and Timelines indicated in the Implementation Framework attached herein, and carried out by key responsible parties. The action plan will be revised and updated in light of changes, according to the framework of the approved national follow up mechanism on the implementation of the Strategy.

<sup>45</sup>. The Bangalore Principles of Judicial Conduct. 2002.





## **Outcome 5: Oversight Bodies More Specialized and Effective in Fighting Corruption**

The Fifth Outcome of the National Anti-Corruption Strategy will be an increased capability of Central Inspection, the Higher Disciplinary Committee, and the Court of Accounts to fight corruption, according to international standards including those issued by the International Organization of Supreme Audit Institutions (INTOSAI). This will be a twofold process including the development of the legislative and regulatory frameworks of each of these bodies, and the development of their capacities to fulfill their roles. The Strategy provides these bodies with the necessary human, financial, and technical resources, within the scope of their mandates and jurisdictions in accordance with current laws and regulations. This will contribute to better application of the amended legislative and regulatory frameworks in future. A stronger Central Inspection, Higher Disciplinary Committee, and Court of Accounts will complement efforts to activate the Ombudsman Law, including the appointment of an Ombudsman and providing them with the necessary resources to start their work. Stronger oversight bodies and institutions will also complement other efforts to integrate and activate internal audit structures and mechanisms within public administration, which will in turn reduce the burden on central oversight bodies. Finally, stronger oversight bodies will continually develop internal control mechanisms to best reflect a changing environment, and encourage better compliance. This Outcome is also aimed at institutionalizing and activating coordination and cooperation among the various components of the oversight system, both existing and new. The fifth Outcome will be achieved through the implementation of six Outputs:

**Output 5.1: Central Inspection modernized and its capacities to detect and fight corruption enhanced**

**Output 5.2: The Higher Disciplinary Committee is modernized and its capacities to fight corruption enhanced**

**Output 5.3: Court of Accounts law modernized and its capacities or ability to detect and fight corruption enhanced**

**Output 5.4: The Ombudsman Law effectively implemented**

**Output 5.5: Internal audit integrated and activated in the public sector**

**Output 5.6: Coordination and cooperation to enhance oversight bodies' role institutionalized and effective**

These six Outputs will be achieved according to a detailed action plan to be developed based on the Areas of Work and Timelines indicated in the Implementation Framework attached herein, and carried out by key responsible parties. The action plan will be revised and updated in light of changes, according to the framework of the approved national follow-up mechanism on the implementation of the Strategy.





## **Outcome 6:**

### **Society Empowered to Participate in Promoting and Fostering a Culture of Integrity**

The sixth Outcome of the National Anti-Corruption Strategy emphasizes the central role of society in fighting corruption. Here, the term 'society' includes individuals, organizations, and all types of associations, unions, schools, universities, religious institutions, and the media. These societal forces can play a pivotal role in reshaping values and behaviors that impact daily life, and creating an environment that either enables or reduces corruption. These efforts must be complemented by political will, and a legal system and institutions that encourage good behavior and prevent corruption from becoming an attractive option for citizens struggling to meet their basic needs in terms of work, health, education, and security. But this should not detract from society's role in promoting and fostering a culture of integrity, through social accountability, encouraging political will, developing a legal system, and promoting institutional capacities, as well as holding all institutions accountable in terms of their responsibilities. This would require action at many societal levels, including individuals and organizations: each must play a role in fighting corruption, and participate in a national index, similar to those in other countries, that measures integrity and corruption. This Outcome also calls for the education and sensitization of societal components through various campaigns, as well as the inclusion of anti-corruption materials in basic, secondary, vocational, and university education curricula and programs. Work will also be done to involve associations, syndicates or unions, and civil society organizations in anti-corruption efforts by providing them with space to work in this field and cooperating with them to build capacities and promote joint cooperation and collective action. In parallel, this Outcome also depends on the participation of journalists, media professionals, and the media, including social media, as well as clerics and religious institutions. The sixth Outcome will be achieved through the implementation of five Outputs:

**Output 6.1: Citizens more aware of the impacts of corruption on their lives and conscious of their role in confronting it**

**Output 6.2: Integrity values and behaviors better fostered among future generations**

**Output 6.3: Associations, syndicates or unions, religious institutions, and civil society organizations more capable of engaging in social accountability and promoting a culture of integrity**

**Output 6.4: Journalists and media professionals more capable of highlighting cases of corruption and reform efforts to counter them**

**Output 6.5: A national index to measure integrity and corruption defined, and disseminated and periodic publication of its results**

These five Outputs will be achieved according to a detailed action plan that will be developed based on the Areas of Work and Timelines indicated in the Implementation Framework attached herein, and by key responsible parties. The action plan will be revised and updated in light of changes, according to the framework of the approved national follow up mechanism on the implementation of the Strategy.



## **Outcome 7:**

### **Preventive Measures against Corruption Integrated at the Sectoral Level**

The seventh and final Outcome involves a gradual integration of the institutionalized corruption prevention platform into specific sectors to ultimately cover all the branches of the public sector as well as the private sector. Dividing up the prevention plan according to sector allows for the concentration of the limited resources in specific areas, the building of specialized capabilities and developing solutions according to the specific type of corruption prevalent in each sector. This type of specialization will increase the likelihood of tangible success, felt by citizens and workers in those sectors and those dealing with them.

This Outcome aims to gradually simplify transactions between the public administration and public service users within the framework of a standard methodology, as well as to support sectors and sub-sectors in assessing the risk of corruption and developing plans to mitigate those risks according to specialized UNDP methodology.<sup>46</sup> Supporting pilot projects will then be launched to implement selected measures from these corruption risk mitigation plans. The successes and failures of these projects will be studied to develop a framework for this Outcome, and eventually, an institutionalization of this methodology in the selected sectors and its promotion in the Lebanese public sector. In addition, support will be provided to the private sector so that it becomes an active partner in corruption prevention. This will be accomplished by the private sector's adoption of special measures in accordance with the UNCAC and international recommendations and corporate governance good practices,<sup>47</sup> and its compliance with the standards of integrity in the private sector, including ISO 37001.<sup>48</sup> The seventh Outcome will be achieved through the implementation of four Outputs:

**Output 7.1: Transactions between public administration and public service users simplified and transparent**

**Output 7.2: Corruption risk management methodologies and tools incorporated in a first sample of public administrations, institutions, and municipalities**

**Output 7.3: Corruption risks reduced in priority areas and sectors**

**Output 7.4: The private sector as an active partner in corruption prevention**

These four Outputs will be achieved according to a detailed action plan to be developed based on the Areas of Work and Timelines indicated in the Implementation Framework attached herein, and by key responsible parties, as specified. The action plan will be revised and updated in light of changes, according to the framework of the approved national follow up mechanism on the implementation of the Strategy.

<sup>46</sup>. United Nations Development Program. 2018. Conceptual Framework. Corruption Risk Assessment at Sectoral Level

<sup>47</sup>. Center for International Private Enterprise. US Aid. 2009. Corporate Governance: The Intersection of Public and Private Reform

<sup>48</sup>. International Organization for Standardization. 2016. Anti-Bribery Management Systems

## Conclusion

The National Anti-Corruption Strategy provides a realistic, practical, and scalable national roadmap for the period between 2020 and 2025. While it is the first of its kind in the history of the Lebanese Republic, it should not be the last and must be followed by continuous and concerted anti-corruption efforts that build on previous successes and benefit from the lessons learned.


This conclusion reviews the most important prerequisites for the effective implementation of this roadmap, determines the mechanism that will be adopted to implement the Strategy, and highlights the benefits to Lebanon at national, regional, and international levels upon successful implementation. The conclusion is based on the previous sections of the document: the introduction outlines the Strategy's general context and explains its development course and methodology; Part I provides an overview of corruption in Lebanon with a scientific definition of corruption and related concepts, and examines the critical factors contributing to its occurrence in the current Lebanese context and the efforts made to combat it in past years; and Part II includes the Strategy's Vision, Mission, and Objectives. Finally, detailed targeted results are shown in the attached Implementation Framework and Monitoring and Evaluation Matrices.

### • Prerequisites for Success

The National Anti-Corruption Strategy, a result of years of complex, difficult work, is unprecedented in terms of its institutionalization, specialization, and participatory nature. However, it is but a starting point. The Strategy alone is not enough to translate the political promises and official obligations into reality, nor to meet the expectations of the Lebanese people in this regard, nor to achieve stability, growth, and sustainable development or create job opportunities. It is now necessary to move as quickly as possible to the crucially important implementation stage, which will require careful consideration of the prerequisites necessary to achieving success. These prerequisites are the elements that will contribute to the creation of a suitable environment for the implementation of the Strategy. They include political will, enhanced democracy, enhanced economic competitiveness, strengthened state institutions, openness to partnerships of various kinds, and sufficient financial and human resources.

#### a- Political will

The Strategy's success depends on the maintaining the political will to fight corruption, which has developed in recent years and been expressed by the President of the Republic, the Speaker of Parliament, the Prime Minister, and various political forces inside and outside the government. However, the political will to fight corruption needs to be expressed in deed, as well as word. There is a need for steadfast national political leadership, at the state and sectoral levels, that is aware of the hotbeds of corruption and of its grave effects on state and society. Political leadership must set a good example for officials and citizens, be convinced and determined, and have sufficient power to make decisions to enhance transparency and



activate accountability. Further, the government must have the power to crack down on the perpetrators of corruption and those involved with them, prosecute them in swift order, and recover their assets acquired through corrupt means.

## **b- Democracy**

Lebanon is one of the region's rare democracies where freedom is widely guaranteed and individual initiative is valued. The Lebanese democratic system is a result of the sacrifices of many generations and represents solid ground for coexistence. It also provides a means for fighting corruption if activated at all levels, in accordance with the Constitution and National Reconciliation Accord. Lebanon's democratic system would allow for the following anti-corruption efforts: a start on abolishing political sectarianism, establishing the Senate, developing public policies and practices to provide the greatest possible protection of public freedoms and human rights, pursuing reforms that would contribute to administrative decentralization and to the establishment of an electoral system that achieves correct and balanced representation, and – eventually – achieving full citizenship where everyone possesses equal rights and obligations.

## **c- Strong institutions**

In modern societies, corruption is correlated with weak or no state institutions. Thus, success in combating corruption depends on the existence of strong, transparent, effective, and accountable institutions at all levels. These institutions must uphold the rule of law and human rights, and give due consideration to the fight against corruption.

The starting point should be the constitutional institutions and their three branches (legislative, executive, and judicial) which need support in order to fully perform their role and cooperate with each other. However, these three branches must at the same time be independent from one another at the same time, i.e. while Parliament performs its legislative function and oversees the work of the executive branch, the executive branch runs the affairs of the country, provides necessary services to citizens and secures the proper functioning of the public facilities, while operating under the supervision of the judicial authority, which in turn ensures the enforcement of the laws and regulations in effect and controls the delicate balance between the legislative and executive authorities. This general institutional environment is the most likely to provide the prerequisites for success, given that it (1) contributes to strengthening the specialized institutions that play a role in fighting corruption, including the oversight, judicial, and security bodies, (2) takes necessary action to enhance their independence and accountability mechanisms, (3) provides them with the necessary resources for their work, (4) builds their capacities through training and qualification programs focused on anti-corruption and designed in accordance with the principles of coordination, integration, and synergy between all training bodies,<sup>49</sup> and (5) reviews and restructures them, and consider whether to merge, abolish, or create complementary bodies, especially given that existing bodies were established in far different conditions than those currently prevailing.

<sup>49</sup> For example, the initiative of the Network of Civil Service Training in Lebanon, which includes several public administrations in addition to training services providers in the public sector, including, but not limited to: the Office of the Minister of State for Administrative Reform, the Institute for Judicial Studies, the Institute of Finance Basil Fuleihan, the National Institute of Administration, the Educational Center for Research and Development, the Directorate of Education in the Lebanese Army, the Training Center of the Central Bank, the Airport Security Enhancement Training Center, the Customs Training Center, the Institute of Internal Security Forces, the National Training Center of the General Security, Libnor Training Center, and the National Council for Scientific Research.



## **d- Openness to partnerships**

Based on Lebanon's history fighting corruption, it's clear that anti-corruption efforts must not be limited to only one body, ministry, or committee. Hence, establishing effective partnerships on many levels must be an essential element in to any anti-corruption effort.

This includes, on the one hand, partnerships between state institutions, to complement traditional work mechanisms with new ways of cooperation, through specialized memoranda of understanding and joint task forces etc. These partnerships provide significant added value in the fight against corruption and help improve performance, rationalize the use of resources, enhance coordination, and avoid duplication.

On the other hand, this includes partnerships with parties other than state institutions,<sup>50</sup> such as the private sector and civil society, universities and research centers, media and artistic production companies, religious institutions, specialized organizations, and friendly states at the regional and international levels.<sup>51</sup> All these entities can bring new expertise to state institutions, expand their pool of financial and human resources, aid in promoting a culture of integrity and collective action, enhance internal compliance at companies, associations, and non-governmental institutions, and practice social accountability and popular control. They also can contribute independent sources of data and information.

## **e- Financial and human resources**

No policy or strategy can achieve its goals without the necessary resources. This includes financial budgets and appropriate oversight mechanisms, in addition to specialized human resources including experts in the law, economics, politics, administration, society, and statistics, etc. Fighting corruption falls within the purview of a wide range of stakeholders. It is the duty of the state, as well as regional and international partners who wish to support stability, job creation, and sustainable development in Lebanon, to provide these stakeholders with the resources they need. First in line should be the state institutions mentioned in the National Anti-Corruption Strategy, all the way down to associations and other non-profit community-based institutions listed in the Implementation Framework Matrix.

Resources invested in the fight against corruption can be considered a profitable investment, because they would benefit of the state and society. These resources would be used to protect public assets, and prevent them from being acquired by corrupt people. These resources may even lead to the recovery of stolen state resources. In addition, state resources would create the conditions necessary to attract internal and external investments, enhance the partnership between the public and private sectors, and guide the performance of the state in general for the benefit of citizens and society as a whole.

<sup>50</sup>. Articles 5 and 13 of the United Nations Convention against Corruption.

<sup>51</sup>. Article 1(b) and Article 5 and some articles of Chapter 6 of the United Nations Convention against Corruption.



- **A National follow-up mechanism on the implementation of the Strategy**

A special national follow-up mechanism on the implementation of the Strategy is also needed. This follow-up mechanism would be responsible for leading and coordinating efforts to implement the Strategy, monitor its progress, and conduct the necessary assessments to make adjustments, and take appropriate measures to enhance communication and cooperation with the various other parties, the public, and external and supportive donors.

Comparative experiences show that the best mechanisms are institutionalized through formal decisions clearly defining their functions, report to top state authorities, include the main bodies responsible for the implementation, are compatible with the institutional structure of the state, and are open to partnerships and cooperation with the rest the concerned parties. However, comparative experiences also confirm that most instances where the task of developing and implementing national anti-corruption strategies was assigned to only one institution, whether a ministry or an independent anti-corruption body, have proved unsuccessful. This is because such a task requires the concerted and simultaneous efforts of several institutions, provided they are led and coordinated by an expert and legitimate party accountable before citizens. The responsibility for the success or failure of the implementation of such strategies, and public policies in general, lies primarily with the executive authority.

Therefore, the executive authority should be assigned responsibility in this regard, and entrusted with the task of following up on the implementation of the Strategy through a special national mechanism, held accountable according to a clear monitoring and evaluation plan. This mechanism should be supported by an independent body responsible for overseeing these efforts, which might take the form of an independent committee of qualified specialists and experts, a national anti-corruption institution, or independent community efforts.

Building on this knowledge, Lebanon established the Ministerial Anti-Corruption Committee and its supporting Technical Committee in 2011. This committee has been tasked with many responsibilities, but its primary task is “overseeing the development of a national anti-corruption strategy and a relevant implementation plan and defining the necessary government policies and objectives for its implementation.” The committee’s other tasks include (1) following up on the implementation of Lebanon’s obligations under UNCAC, (2) promoting and coordinating its participation in the ACINET, (3) coordinating with donors and relevant international and regional organizations, and (4) following up on the legislative process in anti-corruption issues. The Technical Committee has been tasked with supporting the Ministerial Committee. Examples of its assignments include conducting a self-evaluation of the implementation of the UNCAC, activating Lebanon’s participation in the review mechanism, and coordinating the collection and evaluation of relevant legislative provisions and the regular participation in regional and international anti-corruption activities, in particular those related to the work of the ACINET and implementation of the UNCAC. The tasks of the Technical Committee also include submitting recommendations when the Ministerial Committee seeks assistance in making decisions.

These two committees adopted a participatory approach, in theory and practice. This approach is based on Article 2(3) and (5) of the Decision on establishing the Technical Committee, which emphasized that it should “hold periodic consultations with members of Parliament, representatives of the civil society, the media, the private sector, and relevant regional and



international bodies to benefit from their expertise, experiences, and views” and “present the proposals, prepare the studies and reports, and organize the activities and consultations necessary to develop a national anti-corruption strategy and an implementation plan.” This approach has already been implemented on many occasions, especially while developing the National Anti-Corruption Strategy.

As indicated in the introduction to this document, this mechanism, comprising the Ministerial Anti-Corruption Committee and its supporting Technical Committee, has succeeded in accomplishing many of the tasks entrusted to it, in spite of political bickering and media outbidding, the scarcity of resources available to it, the limited political support it has received over five governments and ministers, and the climate of instability prevailing in the country and the region. The dual-committee mechanism has been demonstrated to be successful in many regional and international forums, and has been used in other countries.<sup>52</sup>

As such, this document builds upon the dual-committee mechanism as the special national mechanism in charge of following up on the implementation of the Strategy, while introducing necessary amendments enabling it to play this new role in the next stage, after the Strategy has been developed, consistent with its current roles linked to the implementation of the Strategy.

First, the Ministerial Anti-Corruption Committee should be modified in terms of form. The membership of the committee shall be modified to improve its representation at the political and institutional levels. This modification should also be reflected in the composition of the Technical Committee, to include representatives of the concerned parties in accordance with the National Anti-Corruption Strategy.

Second, the committees should be modified in terms of its tasks. The tasks of the two committees shall be modified by clear provisions on (1) the leadership and coordination of the Strategy implementation, (2) monitoring and evaluation, (3) communication and cooperation with the various concerned parties. The decision on the establishment of the Ministerial Committee explicitly stipulates that it is responsible for supervising the development of the Strategy implementation plan, while the Technical Committee plays a supporting role.

The head of the Technical Committee should establish task forces to develop this plan, including an action plan for each of the seven Outcomes targeted in the Strategy, along with their budgets and measurement indicators. The head of the Technical Committee should also submit to the Ministerial Committee a progress report every six months, according to the Monitoring and Evaluation Matrix and the indicators of the seven action plans. The report shall also include recommendations for pursuing the implementation of the Strategy, enhancing or correcting it in order to make the necessary decisions. An annual report shall be submitted to the President of the Republic, the Speaker of Parliament, and the Prime Minister, and made available to the public.


In conclusion, this document shows the importance of the National Anti-Corruption Strategy within the framework of the reform policies, the Lebanese government’s Vision for Stabilization, Growth, and Employment, efforts made to achieve the UN’s Sustainable Development Goals. It also indicates the most important prerequisites for success. Ultimately, it sets a practical vision for the transition to the implementation stage, in an institutional, participatory, and sustainable manner corresponding to national and international anti-corruption contexts.

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52. Egypt and other countries.



# Matrix of the Implementation Framework of the National Anti-Corruption Strategy 2020-2025

1. Specialized Anti-Corruption Legislation Completed in Accordance with International Standards and better Implemented			
Outputs	Areas of Work	Timeline	Key responsible parties
 <p><b>1.1 A National Anti-Corruption Institution established and activated</b></p>	Developing and implementing the necessary decrees and decisions to appoint the members of the Institution and activate it	Short	Council of Ministers/Ministry of Justice/Ministry of State for Administrative Reform/National Anti-Corruption Institution (upon its establishment)/Civil Service Board
	Providing the Institution with the necessary financial resources to carry out its duties	Short	
	Providing specialized training programs for the members of the Institution	Short	
	Setting the Institution's by-laws, rules of procedure, and code of conduct	Short	
	Appointing the Institution's administrative staff and providing them with specialized training programs	Short	
	Developing the Institution's programs of work, supporting their implementation, and publishing periodic reports on their implementation	Yearly	
	Developing and implementing a communications and information plan for the Institution	Yearly	
<p><b>1.2 An updated and effective system for combating illicit enrichment established and implemented</b></p>	Implementing the Council of Ministers' decisions regarding the establishment of audit committees to detect persons suspected of breaching the Illicit Enrichment Law in force (Law No. 154 dated 27/12/1999)	Short	Parliament/Council of Ministers/ Ministry of Finance/ Ministry of Foreign Affairs/ Ministry of Justice/Ministry of State for Administrative Reform/National Anti-Corruption Institution (upon its establishment)
	Enacting the draft law amending the illicit enrichment law, including provisions related to financial disclosure	Short	
	Developing and implementing the necessary decrees and decisions for the establishment of the system	Short	
	Training relevant employees on the proper enforcement of the law	Medium	
	Automating the financial disclosure system	Medium	
	Implementing a national campaign to collect asset declarations in accordance with the new law	Medium	



<b>1.3 Whistle-blowers' Protection Law effectively implemented</b>	Developing and implementing the necessary decrees and decisions for the establishment of the law	<b>Short</b>	<b>Council of Ministers/Ministry of Justice/Ministry of Finance/Ministry of State for Administrative Reform/National Anti-Corruption Commission Institution (upon its establishment)</b>
	Allocating the necessary budget to provide rewards and assistance to whistleblowers	<b>Short</b>	
	Establishing and activating effective whistleblowing mechanisms	<b>Short</b>	
	Training relevant employees on the proper enforcement of the law	<b>Short</b>	
	Implementing a national campaign to encourage whistleblowing in accordance with the new law	<b>Short</b>	
<b>1.4 An effective conflict of interest management system established and implemented</b>	Retrieving the Conflict of Interest bill presented to the Council of Ministers for review and update	<b>Short</b>	<b>Parliament/Council of Ministers/Ministry of Justice/Ministry of State for Administrative Reform/Civil Service Board/Court of Accounts/Central Inspection/National Anti-Corruption Institution (upon its establishment)</b>
	Enacting the draft law on management of conflict of interest	<b>Medium</b>	
	Developing and implementing the necessary decrees and decisions for the establishment of the system	<b>Long</b>	
	Developing and adopting an action plan supporting the implementation of the Conflict of Interest Law	<b>Every 2 years</b>	
	Training the relevant employees on the proper enforcement of the law	<b>Long</b>	
	Implementing the action plan supporting the application of the Conflict of Interest Law and publishing periodic reports on its implementation	<b>Long</b>	
<b>1.5 The Right of Access to Information Law effectively implemented</b>	Developing and implementing the necessary decrees and decisions for the application of the law	<b>Short</b>	<b>Council of Ministers/Ministry of Justice/ Ministry of State for Administrative Reform/Central Inspection/Council of State/National Anti-Corruption Institution (upon its establishment)</b>
	Assigning information officers in all administrations subject to the law and establishing a national network of information officers	<b>Short</b>	
	Training the relevant employees on the proper enforcement of the law	<b>Short</b>	
	Developing and adopting an action plan supporting the implementation of the Right of Access to Information Law	<b>Every 2 years</b>	
	Implementing the action plan supporting the implementation of the Right of Access to Information law and publishing periodic reports on its implementation	<b>Medium</b>	
	Building the capacities of the National Anti-Corruption institution to carry out its tasks as per the law	<b>Medium</b>	

<p><b>1.6 An effective system for recovering stolen public assets established and implemented</b></p>	Revising existing legislative bills related to the recovery of assets and incorporating them into an integrated text	Short	<p>Parliament/Council of Ministers/Ministry of Foreign Affairs/Ministry of Justice/Ministry of State for Administrative Reform/Public Prosecution/Central Bank/Special Investigation Commission/National Anti-Corruption Institution (upon its establishment)</p>
	Enacting a law to recover stolen public assets	Short	
	Developing and implementing the necessary decrees and decisions for the establishment of the system	Short	
	Training the relevant employees on the proper enforcement of the law	Medium	
	Creating a map of funds suspected of being smuggled out of Lebanon, and launching the tracing process	Short	
<p><b>1.7 Specialized anti-corruption legislation and their effectiveness periodically assessed and reviewed</b></p>	Determining if there is need to develop of other anti-corruption legislations; in particular the legislative bill aiming at modifying the mandate of the Special Investigation Commission established under the Law on Fighting Money Laundering and Terrorist Financing No. 44 dated 24/11/2015	Short	<p>Parliament/Council of Ministers/Ministry of Justice/Ministry of State for Administrative Reform/Higher Judicial Council/Council of State/National Anti-Corruption Commission (upon its establishment)</p>
	Forming and training a specialized national team to conduct periodic assessments and reviews based on international conventions	Short	
	Conducting a comprehensive assessment of anti-corruption legislation and the effectiveness of its implementation and publishing a report on the findings	Every 3 years	
	Establishing and activating a mechanism to assess the risks of corruption in legislative bills, draft laws, and in existing legislation	Medium	
	Establishing and activating a Regulatory Impact Assessment mechanism from an anti-corruption perspective	Medium	
	Establishing and activating a consultation mechanism with civil society and the private sector regarding the reviews and assessments to be carried out by the national team	Medium	
		Medium	



## 2. Higher Levels of Integrity of Public Function Achieved

Outputs	Areas of Work	Timeline	Key responsible parties
<b>2.1 Roles and responsibilities of public officials clearly defined within a modern structure of the overall public sector</b>	Revising existing job descriptions to clarify roles and responsibilities, and address existing corruption risks	Short	<b>Parliament/Council of Ministers/Ministry of State for Administrative Reform/Civil Service Board/Central Inspection</b>
	Developing and implementing an action plan to address corruption risks as a result of the absence/ambiguity of job descriptions within the current structure	Medium	
	Developing a public policy for restructuring the public sector including councils, public institutions, and other public administrations not subject to the Civil Service Board mandate, in compliance with the requirements of good governance and sustainable development	Medium	
	Developing and enacting the necessary laws to implement public policy to restructure the public sector	Long	
	Developing, adopting, and classifying job descriptions within the framework of each new structure as it is approved	Long	

<p><b>2.2 Standards of transparency and merit applied and respected in the appointment of employees/ interns/ volunteers, and their transfer, promotion, compensation and fringe benefits</b></p>	<p>Reviewing and developing a recruitment mechanism for first- and second-category positions, and considering the adoption of a law to determine an appointment mechanism based on transparent and objective criteria</p>	<p><b>Short</b></p>	<p><b>Parliament/Ministry of State for Administrative Reform/ Civil Service Board/Central Inspection/Ministry of National Defense/Ministry of Interior and Municipalities</b></p>
	<p>Establishing and implementing a system of evaluation for the productivity and performance of public officials, and applying a reward and punishment principle accordingly</p>	<p><b>Short</b></p>	
	<p>Establishing and implementing mechanisms to ensure that standards of transparency and merit are respected while (1) designing competitive examinations and announcing results, and (2) in the appointment and/or recruitment of interns or volunteers in all government departments, including non-civil corps</p>	<p><b>Medium</b></p>	
	<p>Filling the vacant positions in all public administrations through the appointment of personnel or officers in charge, or other mechanisms including commissioning as mentioned in the personnel regulations; filling first-and second-category positions through established mechanism of recruitment, ensuring non-contradiction with policies and laws that restrict or prevent this</p>	<p><b>Medium</b></p>	
	<p>Monitoring compliance with the laws and formal mechanisms related to the recruitment of employees/interns/volunteers, and the transfer and promotion of public officials including those in non-civil positions, and preparing an annual report on violations to begin necessary legal proceedings</p>	<p><b>Yearly</b></p>	
	<p>Establishing pre-defined criteria to regulate and reduce, to the maximum possible extent, commissioning in public administrations, institutions, and municipalities</p>	<p><b>Medium</b></p>	
	<p>Evaluating the productivity and performance of employees in every public administration and institution, and providing the relevant agencies with a report that includes assessment outcomes and the resulting rewards and penalties</p>	<p><b>Yearly</b></p>	
	<p>Developing and enacting legal provisions and regulations on the acceptance of gratuities and gifts of all kinds</p>	<p><b>Medium</b></p>	
	<p>Developing and enacting special regulations that set criteria for the formation of committees and compensation of their members</p>	<p><b>Medium</b></p>	

<p><b>2.3 A modern and integrated system to to promote ethical behavior in public administrations, and institutions, and municipalities established and implemented</b></p>	<p>Reviewing, developing, and adopting a Code of Ethics for all public officials, regardless of whether they are under the mandate of the Civil Service Board</p>	<p><b>Short</b></p>	<p><b>Council of Ministers/Ministry of State for Administrative Reform/ Civil Service Board/Central Inspection Bureau/National Anti-Corruption Institution (upon its establishment)</b></p>
	<p>Designing and implementing a campaign to disseminate the Code of Ethics to public administrations, institutions, and municipalities, and raising the awareness of stakeholders on the Code's content</p>	<p><b>Medium</b></p>	
	<p>Establishing mechanisms to monitor compliance with the Code, including guidance and training, and taking measures to stimulate implementation, grant rewards, and impose penalties accordingly</p>	<p><b>Medium</b></p>	
	<p>Assigning an employee or committee in each public administration, institution, and municipality to follow up on the implementation of the Code, monitor compliance, and submit a report recommending any necessary action; and linking these employees together in a national network</p>	<p><b>Medium</b></p>	
	<p>Developing and implementing a specialized training program for these employees and committee members assigned to follow up on the implementation and monitor compliance with the Code</p>	<p><b>Medium</b></p>	
<p><b>2.4 Independence and effectiveness of the Civil Service Board enhanced</b></p>	<p>Developing a report on the possible expansion of the Civil Service Board's jurisdiction, and proposing alternative measures to enhance the integrity of public officials not subject to its oversight</p>	<p><b>Medium</b></p>	<p><b>Parliament/Council of Ministers/Civil Service Board/Ministry of State for Administrative Reform</b></p>
	<p>Revising the Civil Service Board Law and enacting the necessary amendments to update and develop it in accordance with international standards</p>	<p><b>Long</b></p>	
	<p>Developing and implementing the necessary decrees and decisions to enhance the independence and effectiveness of the Civil Service Board</p>	<p><b>Long</b></p>	
	<p>Developing and implementing a training program for Civil Service Board employees in accordance with the new law and related decrees</p>	<p><b>Long</b></p>	
	<p>Enhancing the Civil Service Board's internal capacities to fight corruption</p>	<p><b>Long</b></p>	
	<p>Incorporating anti-corruption material into the training programs of the National Institute of Administration</p>	<p><b>Medium</b></p>	



### 3. Public Procurement System Less Vulnerable to Corruption

Outputs	Areas of Work	Timeline	Key responsible parties
<b>3.1 Centralized and decentralized public procurement more transparent and competitive</b>	Establishing an optional standard e-platform (pending a mandatory platform) for the announcement of public procurement tenders, and publishing the bidding documents and contract awards to enable stakeholders to obtain information on all types of public procurement	<b>Short</b>	
	Establishing a public database on the unified e-platform, including information on the suppliers and awarded contracts as per the applicable laws	<b>Medium</b>	
	Supporting the adoption and effective implementation of e-procurement mechanisms	<b>Medium</b>	
	Supporting all public administrations, institutions, and municipalities, in developing and publishing mandatory annual public procurement plans	<b>Short</b>	
	Encouraging administrations including public institutions and municipalities to publish their annual procurement plans, bidding documents and contract awards of all public procurement operations they have conducted	<b>Short</b>	<b>Council of Ministers/Ministry of Finance/Ministry of State for Administrative Reform/Tenders Administration at the Central Inspection</b>
	Revising and adopting clear, integrated, and standardized documents (general and specific standard bidding documents) according to the Public Procurement Law	<b>Short</b>	
	Redesigning the paperwork formalities at all stages of public procurement and substituting them with electronic documents whenever possible (or upon the adoption of e-procurement)	<b>Medium</b>	
	Strengthening controls to restrict consensual agreements and related exceptions, to the maximum possible extent, in accordance with the regulations in force, and updating them when needed	<b>Medium</b>	

<p><b>3.2 Clear and effective oversight, control, and auditing mechanisms adopted and implemented at all stages of centralized and decentralized public procurement</b></p>	<p>Reviewing and adopting Codes of Ethics for all concerned employees and actors involved in public procurement</p>	<p><b>Short</b></p>	<p><b>Council of Ministers/ Parliament/Ministry of Finance/Ministry of State for Administrative Reform/Tenders Administration at Central Inspection/Court of Accounts/ State Council</b></p>
	<p>Dedicating specific training sessions on integrity within all training programs related to public procurement – including oversight and audit – for relevant employees in both public and private sectors</p>	<p><b>Yearly</b></p>	
	<p>Revising, adopting, and disseminating practical and procedural manuals on centralized and decentralized public procurement, and on the supervision, oversight, and auditing of all its operations at all stages</p>	<p><b>Medium</b></p>	
	<p>Implementing the laws in force, standardizing mechanisms related to the categorization of suppliers and consultants, and developing provisions of exclusion from participation in centralized and decentralized public procurement</p>	<p><b>Short</b></p>	
	<p>Establishing a database available to public officials involved in public procurement, including information on suppliers and contracts awarded to them</p>	<p><b>Medium</b></p>	
	<p>Establishing and adopting clear mechanisms of supervision of the decentralized public procurement cycle</p>	<p><b>Short</b></p>	
	<p>Developing provisions to deal with complaints and objections in a fair, transparent, specialized, and timely manner</p>	<p><b>Short</b></p>	
	<p>Strengthening internal controls to ensure integrity of public procurement operations carried out in public administrations, institutions, and municipalities</p>	<p><b>Medium</b></p>	
	<p>Encouraging suppliers to develop and implement internal controls requirements, compliance measures, and anti-corruption programs for public procurement from the private sector side</p>	<p><b>Medium</b></p>	

<b>3.3 Tenders Administration better able to reduce corruption in public procurement within its mandate</b>	Making the necessary legal and regulatory amendments to activate the Tenders Administration in fighting corruption	Medium	<b>Council of Ministers/ Parliament/Ministry of Finance/ Tenders Administration at Central Inspection/Ministry of State for Administrative Reform</b>
	Strengthening the institutional, human, and financial capacities of the Tenders Administration	Medium	
	Developing and implementing a training program for Tenders Administration employees on corruption risk assessment and detection in public procurement	Short	
	Developing a guide for public procurement committees established by the Tenders Administration, with directives that take into account standards of integrity and transparency	Short	
	Enabling the Tenders Administration to study, analyze, and provide feedback on objections submitted to it	Short	
	Applying e-procurement procedures to the Tenders Administration regarding the public procurement operations that fall within its mandate	Medium	
<b>3.4 A comprehensive law that fosters public procurement, its oversight and audit as per international standards approved and implemented</b>	Finalizing the Methodology for Assessing Public Procurement Systems (MAPS) taking into consideration prior assessments in order to identify the needed requirements to develop a public procurement system from an anti-corruption perspective	Short	<b>Council of Ministers/ Parliament/Ministry of Justice/ Ministry of Finance/Ministry of State for Administrative Reform/Tenders Administration at Central Inspection/Court of Accounts</b>
	Developing and implementing a mechanism to engage private sector and civil society in elaborating or introducing legal or regulatory amendments to existing legal provisions that govern public procurement	Short	
	Enacting a new and modern public procurement law in compliance with best international standards and recommendations	Short	
	Developing and implementing the necessary decrees and decisions to approve and apply the law	Medium	
	Issuing guidelines to interpret the public procurement law upon its enactment	Medium	
	Developing and implementing training programs on the new law for all employees and actors involved in public procurement, in both public and private sectors	Medium	
Revising the laws periodically to avoid conflict of powers between institutions in charge of public procurement, redefining these powers, and determining the duties when necessary	Yearly		





## 4. A Judicial System more Impartial and Capable of Fighting Corruption

Outputs	Areas of Work	Timeline	Key responsible parties
<b>4.1 Judicial independence Strengthened as per international standards</b>	Developing and adopting accurate scientific standards for the transfer of judges, and applying a schedule of periodic transfers	Short	<b>Higher Judicial Council/ Council of State/Ministry of Justice/Ministry of State for Administrative Reform/ Parliament</b>
	Promoting cooperation between relevant authorities to maintain material and moral guarantees for judges	Short	
	Establishing and adopting a mechanism that ensures the non-transfer of judges appointed by Council of Ministers' decision	Short	
	Improving security in courthouses security and enhancing the security of judges	Short	
	Preparing and enacting a comprehensive law to enhance judicial independence as per international standards	Short	
	Developing and implementing the necessary decrees and decisions to strengthen judicial independence	Medium	

<p><b>4.2 Integrity of the judiciary reinforced to enhance trust in judicial power</b></p>	Revising, developing, and adopting codes of ethical conduct for judges, judicial assistants, and experts, with practical implementation guides for each	Short	<p>Higher Judicial Council/ State Council/Ministry of Justice/Ministry of State for Administrative Reform/ Parliament</p>
	Designing and implementing a campaign to disseminate the codes of ethical conduct and their guidelines manual to concerned actors and those who deal with them	Short	
	Establishing mechanisms to monitor compliance with the codes including guidance and trainings, measures to stimulate their implementation, and granting rewards and imposing punishments accordingly	Short	
	Modernizing the Judicial Inspection Authority and enhancing its human resources and technological capacities	Medium	
	Establishing and adopting modern systems for the assessment of judicial work	Short	
	Establishing and adopting a transparent and equitable system for the distribution of judges among judicial committees and committees of a judicial nature	Medium	
	Activating the publication of disciplinary measures including the removal of judges for disciplinary violations	Short	
	Issuing and publishing annual reports on the work of the judiciary	Short	
	Strengthening the information and communications capacities of the Higher Judicial Council and the Council of State	Short	
<p><b>4.3 Work of courts and their departments is more transparent</b></p>	Establishing a clear and integrated schedule of court sessions and reducing the time between them	Short	<p>Higher Judicial Council/ State Council/Ministry of Justice/Ministry of State for Administrative Reform/ Parliament</p>
	Establishing and enacting amendments to legal provisions, in order to expedite the resolution of lawsuits according to a clear schedule	Short	
	Controlling, activating, and updating the forensic systems, and looking into the accountability of diagnosis, providing solutions, and raising examination costs	Medium	
	Establishing structures in courthouses responsible for the receiving citizens, and providing them with information and guidance	Medium	
	Simplifying procedures and enhancing transparency and accountability in the management of the Commercial Register	Medium	
	Introducing information technology into judicial systems and automating court procedures	Medium	
		Medium	

<p><b>4.4 Highest levels of legal, procedural, and technical capacities achieved in the prosecution of corruption crimes</b></p>	<p>Studying the establishment of specialized jurisdiction, public prosecution offices, and judicial police specialized in fighting corruption</p>	<p><b>Short</b></p>	<p><b>Parliament/Higher Judicial Council/Council of State/Ministry of Justice/Public Prosecution/Special Investigation Commission/National Anti-Corruption Institution (upon its establishment)</b></p>
	<p>Establishing and enacting legislative amendments to bridge gaps and avoid conflict of powers in the legislation related to the procedures of prosecution of corruption crimes; and overcoming obstacles, especially those related to immunity and bank secrecy</p>	<p><b>Short</b></p>	
	<p>Studying the enhancement of constitutional and legal provisions organizing the Supreme Council for the Prosecution of Presidents and Ministers</p>	<p><b>Short</b></p>	
	<p>Developing and implementing a program to activate the Supreme Council for the Prosecution of Presidents and Ministers</p>	<p><b>Medium</b></p>	
	<p>Strengthening the human resource capacities of the judiciary, especially in the courts and tribunals in charge of prosecution of corruption crimes</p>	<p><b>Medium</b></p>	
	<p>Developing modern techniques to enhance the role of the public prosecutors in supervising preliminary investigations</p>	<p><b>Medium</b></p>	
	<p>Introducing a legislative amendment enforcing a deadline for the administration to answer authorization requests to prosecute employees; this will include the provision that if deadlines are not met, authorization is granted automatically</p>	<p><b>Medium</b></p>	
	<p>Establishing an administrative unit within the Council of State to follow up on the implementation of its decisions, document cases of non-compliance with its provisions, and submit subsequent reports to the concerned constitutional authorities</p>	<p><b>Medium</b></p>	
	<p>Improving the theoretical and practical curricula in the Institute of Judicial Studies, and incorporating new study materials and methods for fighting corruption in related fields such as public finance, accounting, information, communications, and the environment</p>	<p><b>Medium</b></p>	
	<p>Developing and implementing a capacity-building program on international judicial cooperation: mutual legal assistance mechanisms, asset recovery, extradition</p>	<p><b>Medium</b></p>	



## 5. Oversight Bodies more Specialized and Effective in Fighting Corruption

Outputs	Areas of Work	Timeline	Key responsible parties
<b>5.1 Central Inspection modernized and its capacities to detect and fight corruption enhanced</b>	Conducting a systematic assessment of Central Inspection's current capacities in the anti-corruption field	Short	Parliament/Central Inspection/ Ministry of State for Administrative Reform/ National Anti-Corruption Institution (upon its establishment)
	Developing and implementing a comprehensive plan to strengthen anti-corruption capacities within Central Inspection	Short	
	Filling vacant positions at Central Inspection cadre and expanding it with the necessary technical expertise, subject to non-contradiction with policies and laws that restrict or prevent this	Medium	
	Introducing information and communication technology tools to enhance the transparency and effectiveness of Central Inspection's work	Medium	
	Developing a mechanism to receive and resolve complaints raised to Central Inspection	Medium	
	Revising and enhancing performance evaluation systems for Inspectors General and linking them to a transparent reward and punishment mechanism	Medium	
	Developing and enacting necessary legal provisions to enhance the role and independence of Central Inspection, reinforce its oversight capacities to the maximum possible extent, and enable it to fulfill its tasks in terms of holding public officials accountable for misconduct and administrative violations	Medium	
	Updating Central Inspection's capacities enhancement plan to meet the requirements of subsequent amendments made to the legal provisions governing its work	Long	

<p><b>5.2 The Higher Disciplinary Committee is modernized and its capacities to fight corruption enhanced</b></p>	<p>Filling vacant positions of the Higher Disciplinary Committee cadre and providing them with the necessary technical expertise, subject to non-contradiction of policies and laws that restrict or prevent this</p>	<p><b>Medium</b></p>	<p><b>Parliament/Higher Disciplinary Committee/Ministry of State for Administrative Reform/National Anti-Corruption Institution (upon its establishment)</b></p>
	<p>Developing and enacting the necessary legal provisions to activate the Higher Disciplinary Committee in fighting corruption by enhancing its mandate and developing its structure to enable it to better carry out its duties</p>	<p><b>Medium</b></p>	
	<p>Amending the human resources structure of the Higher Disciplinary Committee and introducing new positions to meet the requirements of subsequent amendments made to the legal provisions governing its work</p>	<p><b>Long</b></p>	
	<p>Developing and implementing a comprehensive plan to enhance the capacities of the Higher Disciplinary Committee, in accordance with subsequent amendments made to the legal provisions governing its work</p>	<p><b>Yearly</b></p>	
<p><b>5.3 The Court of Accounts is modernized and its capacities to detect and fight corruption enhanced</b></p>	<p>Communicating the special reports issued by the Court of Accounts to: the President of the Republic, the Speaker of Parliament, the Prime Minister and the members of Parliament; and publishing them on its website and in the media</p>	<p><b>Short</b></p>	<p><b>Parliament/Court of Accounts/Ministry of State for Administrative Reform/National Anti-Corruption Institution (upon its establishment)</b></p>
	<p>Conducting a systematic assessment of the current capacities of the Court of Accounts in detecting and fighting corruption</p>	<p><b>Short</b></p>	
	<p>Developing and implementing a comprehensive plan to strengthen the capacities of judges, advisors, and employees of the Court of Accounts</p>	<p><b>Yearly</b></p>	
	<p>Filling the vacant positions in the Court of Accounts cadre and expanding it with necessary technical expertise, subject to non-contradiction with the policies and laws that restrict or prevent this</p>	<p><b>Medium</b></p>	
	<p>Taking the necessary legislative and administrative measures to expand the Court of Accounts' control capacity to the maximum possible extent and grant it power to oversee performance</p>	<p><b>Medium</b></p>	
	<p>Establishing systems at the Court of Accounts to assess the quality of its work, supplies, and services implemented and provided for the benefit of entities subject to its control</p>	<p><b>Medium</b></p>	
	<p>Issuing the necessary organizational provisions for the preparation of accounts of bodies subject to control, identifying and unifying bookkeeping methods and submitting them to the Court of Accounts for audit and review, while updating the methods of control, enhancing its techniques, and adopting international auditing standards in order to expedite the control process and increase its effectiveness</p>	<p><b>Medium</b></p>	
	<p>Activating the ex-post judicial control of accounts and employees, and raising the value of fines imposed by the Court of Accounts on public officials for violations committed in proportion to the impact of damages and losses affecting public funds</p>	<p><b>Medium</b></p>	

<b>5.4 The Ombudsman Law effectively implemented</b>	Appointing the Ombudsman in accordance with Law No. 664 of 05/02/2005	<b>Short</b>	<b>Council of Ministers/The Ministry of State for Administrative Reform/Ombudsman (Upon appointment)</b>
	Developing and implementing the necessary decrees and decisions to apply the law	<b>Medium</b>	
	Providing the Ombudsman with the necessary human and financial resources to carry out their duties	<b>Medium</b>	
	Providing a specialized training program for the Ombudsman and its assisting body	<b>Yearly</b>	
	Implementing a national awareness campaign to introduce the Ombudsman role	<b>Medium</b>	
	Developing and adopting a guide on the work regulations and procedures of Ombudsman and its assisting body	<b>Medium</b>	
	Developing and implementing the Ombudsman's program of work, and publishing periodic reports	<b>Yearly</b>	
<b>5.5 Internal audit integrated and activated in the public sector</b>	Evaluating the internal audit status including analyzing current legal and regulatory framework, in order to provide recommendations for the incorporation of the internal audit function into administrations, including public institutions and municipalities	<b>Short</b>	<b>Council of Ministers/Ministry of Finance/Ministry of State for Administrative Reform/Central Inspection/Court of Accounts</b>
	Raising awareness of the importance of the internal audit function of the main oversight institutions (Central Inspection and the Court of Accounts)	<b>Short</b>	
	Conducting a capacity needs assessment and recommending an institutional framework for the internal audit unit (jobs, recruitments, etc.)	<b>Medium</b>	
	Developing an internal audit strategy, an internal audit charter, as well as manuals and brochures based on international standards and best practices	<b>Medium</b>	
	Providing relevant training to the Ministry of Finance and concerned administrations	<b>Medium</b>	
	Supporting the periodic development of internal audit reports	<b>Yearly</b>	
	Establishing and training a joint committee for permanent coordination and exchange of information between oversight bodies	<b>Medium</b>	
<b>5.6 Coordination and cooperation to enhance oversight bodies' role is institutionalized and effective</b>	Supporting joint strategic planning among oversight bodies	<b>Medium</b>	<b>Council of Ministers/Ministry of Finance/Ministry of State for Administrative Reform/Central Inspection/Court of Accounts/National Anti-Corruption Institution (upon its establishment)/Ombudsman (upon appointment)</b>
	Automating the linkages of files examined by oversight bodies and establishing a common database	<b>Medium</b>	
	Supporting oversight bodies in enhancing their communication mechanisms with citizens using traditional and digital means	<b>Medium</b>	
		<b>Medium</b>	



## 6. Society Empowered to Participate in Promoting and Fostering a Culture of Integrity

Outputs	Areas of Work	Timeline	Key responsible parties
<p><b>6.1 Citizens more aware of the impacts of corruption on their lives and conscious of their role in confronting it</b></p>	<p>Designing and implementing a national media campaign to raise awareness on the need to preserve public assets and property, and citizens' rights and obligations in this regard</p>	<p><b>Short</b></p>	<p><b>Parliament/Ministry of Interior and Municipalities/Ministry of Culture/Ministry of Information/Ministry of State for Administrative Reform/National Anti-Corruption Institution (upon its establishment)</b></p>
	<p>Developing and implementing an awareness program to educate citizens on the concepts of corruption and its impact on both development and their daily lives; as well as their role as citizens and the institutions' role in fighting it</p>	<p><b>Medium</b></p>	
	<p>Organizing dialogues at local levels, in cooperation with municipalities, on ways to enhance transparency in municipal work, presenting efforts made to that end, and obtaining suggestions from residents in this regard</p>	<p><b>Yearly</b></p>	
	<p>Designing awareness-raising and empowerment activities to highlight the impact of corruption on women and children, and the role of women in confronting corruption at all levels</p>	<p><b>Medium</b></p>	
	<p>Cooperating with advertising and production companies and the media to integrate the values of integrity, honesty, and good citizenship into their work</p>	<p><b>Medium</b></p>	
	<p>Incorporating integrity and anti-corruption values and concepts into the curricula of primary and secondary education institutions</p>	<p><b>Medium</b></p>	
<p><b>6.2 Integrity values and behaviors better fostered among future generations</b></p>	<p>Developing specific anti-corruption/governance programs or integrating stereotypical curricula or educational content on integrity, governance, ethics, and anti-corruption into the programs of the higher education institutions</p>	<p><b>Medium</b></p>	<p><b>Ministry of Education and Higher Education/Ministry of Culture/Ministry of Information /Ministry of State for Administrative Reform/National Anti-Corruption Institution (upon its establishment)</b></p>
	<p>Developing specific anti-corruption/governance programs or integrating stereotypical curricula or educational content on integrity, governance, ethics and anti-corruption into the programs of the technical and vocational education institutions</p>	<p><b>Medium</b></p>	
	<p>Establishing and supporting a national network of student integrity clubs at the Lebanese University and private universities</p>	<p><b>Medium</b></p>	
	<p>Promoting research on enhancing integrity and fighting corruption at the school and university levels</p>	<p><b>Medium</b></p>	



<p><b>6.3 Associates, syndicates or unions, religious institutions, and civil society organizations more capable of engaging in social accountability and promoting a culture of integrity</b></p>	Providing guidance, support, and encouragement to integrate good governance principles and practices into the activities of associations, syndicates, and other nonprofit organizations	<b>Long</b>	<p><b>Ministry of Interior and Municipalities/Ministry of Information/Ministry of State for Administrative Reform/National Anti-Corruption Institution (upon its establishment)</b></p>
	Establishing and adopting effective mechanisms to promote the participation of organizations, syndicates, and other components of civil society in the implementation of the national strategy and the oversight of its progress	<b>Short</b>	
	Providing a specialized training program to build the capacity of civil society to support implementation of the national strategy and oversee its implementation	<b>Yearly</b>	
	Supporting the establishment of a national network that brings together activists, representatives of organizations, syndicates, and other components of civil society, as a platform for cooperation, coordination, and capacity building in the fight against corruption	<b>Short</b>	
	Supporting Parliament in holding hearings and dialogues between members of parliament and citizens on efforts to fight corruption	<b>Medium</b>	
	Revising the legal provisions, regulations, and prevailing practices that restrict the rights and freedoms guaranteed by the constitution, including strict provisions regarding defamation, libel, and slander	<b>Medium</b>	
<p><b>6.4 Journalists and media professionals more capable of highlighting cases of corruption and reform efforts to counter them</b></p>	Providing a specialized training program to strengthen the capacities of journalists and media professionals to cover anti-corruption efforts, and encourage their independent contributions to promoting and fostering a culture of integrity	<b>Yearly</b>	<p><b>Ministry of Information/Ministry of State for Administrative Reform/National Anti-Corruption Institution (upon its establishment)</b></p>
	Developing and disseminating a Code of Ethics and Professional Conduct for journalists and media professionals	<b>Medium</b>	
	Encouraging the media to devote sufficient time and space to building a culture of integrity, and enhancing cooperation to provide them with accurate information	<b>Medium</b>	
	Training journalists in investigative journalism techniques in a professional and objective manner	<b>Yearly</b>	
	Developing and adopting a national index that monitors corruption, according to international standards and specialized methodologies	<b>Medium</b>	
	Conducting a national research project on corruption and developing national indicators to monitor its development and measure the Strategy's impact	<b>Short</b>	
<p><b>6.5 A national index to measure integrity and corruption defined and disseminated, and periodic publication of its results</b></p>	Establishing an anti-corruption portal to gather and share useful information on corruption with citizens and professionals	<b>Medium</b>	<p><b>Council of Ministers/Central Administration of Statistics/Ministry of State for Administrative Reform/National Anti-Corruption Institution (upon its establishment)</b></p>
	Surveying opinions of representatives of organizations, syndicates, private sector organizations, and civil society on important issues related to fighting corruption	<b>Short</b>	





## 7. Preventive Measures against Corruption Integrated at the Sectoral Level

Outputs	Areas of Work	Timeline	Key responsible parties
<b>7.1 Transactions between public administration and public service users simplified and more transparent</b>	Establishing units responsible for the receiving and providing information to citizens, and providing guidance to citizens and all those who deal with the public administrations, institutions, and municipalities	Medium	<b>Ministry of State for Administrative Reform/Ministry of Interior and Municipalities/all relevant ministries (each within its area of competence)/Mediator of the Republic (upon activation)</b>
	Applying a single-window system or one-stop shop in public administrations, institutions, and municipalities	Medium	
	Improving the quality of waiting areas within the public administrations, institutions, and municipalities and developing electronic systems to reduce waiting time and improve citizens' experience	Medium	
	Simplifying administrative procedures, standardizing related transactions and disseminating them in relevant administrations, as well as through a dedicated electronic portal	Medium	
	Establishing a digital platform for an open government that places citizens at the center of its interests and provides a single-window or one-stop shop for all government services provided to citizens, private sector, and all other parties, including administrations at the local level	Medium	
	<b>7.2 Corruption risk management methodologies and tools incorporated in a first sample of public administrations, institutions, and municipalities</b>	Raising awareness and increasing specialized knowledge of all administrations including public institutions and municipalities	
Establishing and training task forces in selected administrations, including public institutions and municipalities, on corruption risk management		Short	
Supporting these task forces in conducting and publishing corruption risk assessments, and organizing dialogues and meetings to discuss findings		Short	
Supporting these teams in proposing and disseminating risk mitigation plans and conducting dialogues and meetings		Medium	
Providing financial and technical support for the implementation of selected measures to reduce the risks of corruption based on completed assessments and prepared plans		Medium	
Supporting these teams in monitoring and evaluating the progress in implementing the risk mitigation plans		Medium	
Developing and publishing periodic reports on the progress achieved in corruption risk management according to the mechanism adopted in the Strategy		Yearly	
Extending the scope of action to cover other administrations in a second phase		Medium	
Extending the scope of action to cover other administrations in a third phase		Long	


			Short	
<b>7.3 Corruption risks reduced in priority areas and sectors</b>	Enhancing the implementation of the Law on Transparency in the Oil and Gas Sector		Medium	
	Reducing corruption risks in hospitalization system and supply chain of drugs, medical equipment, and supplies		Medium	
	Improving corporate governance of banks and the relationship between the Central Bank and the Executive Authority		Medium	
	Reducing corruption risks in permits issue procedure by the Ministry of Energy and Water		Medium	
	Reducing corruption risks in procedures developed for the equivalence of school and university certificates and formalities of private schools and universities		Medium	
	Reducing corruption risks in customs transactions, especially import		Medium	
	Reducing corruption risks in objection and appeal on taxation		Medium	
	Reducing corruption risks in Land Registry transactions		Medium	
	Reducing corruption risks in the rules of procedures of various committees at the Ministry of Environment		Medium	
	Reducing corruption risks in mechanisms for granting construction and investment certificates and oversight of the work of quarries and crushers at the Ministry of Environment		Medium	
	Implementing the Integrated Solid Waste Management Law		Medium	
	<b>7.4 The private sector as active partner in corruption prevention</b>	Developing and enacting legislative provisions complementing the legal system aiming at fighting corruption in the private sector		Medium
		Designing, through a participatory process, a Code of Good Practices to prevent corruption in the private sector and establishing a motivation and oversight mechanism		Medium
Revising the Companies Law and related legal provisions to promote the adoption of good governance measures			Long	
Encouraging the private sector to spread anti-corruption culture and adhere to the principles of transparency, integrity, and accountability			Short	
Enhancing transparency and accountability in public-private partnerships			Medium	
Developing and adopting appropriate incentives to encourage collective action with a view to enhancing integrity and anti-corruption; i.e. integrity pacts and declarations of commitment to the principles of the United Nations Global Compact			Medium	
Establishing a joint public-private mechanism to enhance corporate governance in the private sector companies			Long	

Parliament/Council of Ministers/ National Anti-Corruption Institution (upon its establishment)/Ministry of State for Administrative Reform/ all relevant ministries and administrations (each within its area of competence)

Parliament/Council of Ministers/Ministry of Industry/ Ministry of Finance/Ministry of Economy and Trade/Ministry of State for Administrative Reform/Central Bank/High Council for Privatization

# Matrix of Monitoring and Evaluation of the National Anti-Corruption Strategy 2020-2025

Objectives	Indicators	Data Source	Baseline	Targeted Level						
				2020	2021	2022	2023	2024	2025	
<b>Enhancing transparency</b>	Percentage of commitment of "administrations" in the mandatory publication of Information as per the definition of the Access to Information Law provisions	The administrations' websites	To be determined based on a study carried out by the Ministry of State for Administrative Reform within 3 months							Percentage of 100% of commitment
	Number of public procurement contracts published in a transparent manner	The concerned public administrations	To be determined based on a study carried out by the Ministry of State for Administrative Reform within 3 months							100% Increase
	Clarity of the process of interaction between public service users, ministries, public institutions and municipalities, and the rights and obligations of both parties	Surveys completed by public service users	To be determined based on a baseline survey							



Objectives	Indicators	Data Source	Baseline	Targeted Level						
				2020	2021	2022	2023	2024	2025	
<b>Activating accountability</b>	Number of public officials who received training on the specialized anti-corruption legislations	The Technical Anti-Corruption Committee	"Zero"							3,000
	The level of compliance with the provisions of Chapters II and III of the UNCAC	The Technical Anti-Corruption Committee	To be determined based on a study carried out by the Ministry of State for Administrative Reform within 3 months							Full compliance
	The quality of the internal control systems at the ministries, public institutions, and municipalities	The Technical Anti-Corruption Committee	To be determined based on a study carried out by an independent advisory body							Based on the study
<b>Ending impunity</b>	The number of investigators and judges trained on investigating corruption crimes	The Technical Anti-Corruption Committee	"Zero"							500
	The number of convictions for corruption crimes among public officials of the second category and higher	The Higher Judicial Council	To be determined based on a study carried out by the Higher Judicial Council							Based on the study
	The value of the proceeds of corruption crimes for which a recovery process is initiated on behalf of the State	The Technical Anti-Corruption Committee	To be determined based on a study carried out by the Ministry of Justice within 3 months							Based on the study

## Monitoring and Evaluation Plan

Activity	Target	Timeline	Action	Implementing Party
Institutionalization	Establishing a national team trained on monitoring and evaluation	Within 3 months of the approval of the Strategy	The president of the Technical Anti-Corruption Committee issuing a decision establishing the team and providing it with intensive training sessions	The Technical Anti-Corruption Committee
Primary data	Collecting data to determine the baseline of the indicators	Within 6 months of the approval of the Strategy	Conducting the surveys, questionnaires, and studies	The Technical Anti-Corruption Committee and other relevant parties
Monitoring	Analyzing the progress of the Strategy using the Implementation Framework Matrix and related action plans	Every 6 months	The team monitors the work and prepares a progress report based on an approved template	The National Monitoring and Evaluation Team
Risk management	Reducing the risks that can affect the Strategy	Yearly	The team identifies and assesses the risks, proposes ways to mitigate them, and develops and updates a matrix for it	The National Monitoring and Evaluation Team
Periodic assessment	Reviewing or assessing performance using the Implementation Framework Matrix and related action plans	Yearly	The committee studies the reports and information submitted to it, and takes decisions to ensure proper implementation	The Ministerial Anti-Corruption Committee
Reports	Documenting and publishing the Strategy's activities and their outcomes	Yearly in addition to a final report	Developing a report that summarizes key activities and the progress of carrying out the Implementation Framework Matrix, stating the challenges, risks, and recommendations for the development of the next Strategy	The Ministerial Anti-Corruption Committee and its supporting Technical Committee




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## Annexes

### Annex 1:

#### **Proposals of the Sub-committee on the on the development of the National Anti-Corruption Strategy - By virtue of the Decision of the Minister of State for Administrative Reform 174 dated 18/02/2016**

### 1. Proposals to the public authority


#### a. Proposals to the legislative authority

1. Prioritize the enactment of the draft laws and bills submitted to Parliament and that contribute to curbing the corruption phenomenon, and in particular the laws on:
  - The establishment of an independent national anti-corruption committee
  - Whistleblowers' Protection
  - the Court of Accounts
  - Central Inspection
  - Public Procurement
  - the Civil Service Board
  - Public Accounting
  - Illicit Enrichment
2. Develop and enact necessary new bills based on an independent, scientific anti-corruption needs assessment, particularly in relation to the judicial reform (judiciary, administrative, financial, and of the Military Tribunal) as well as to the Competition Law and to the Higher Disciplinary Committee Law, and expedite the drafting of a law to prevent conflict of interest.
3. Update the real estate laws and regulations, particularly those related to the identification of public property in unsurveyed areas (Decision No. 144 dated 10/6/1925) and to the management and sale of the private state immovable property (Decision No. 275 dated 25/5/1926), and standardize them where necessary.
4. Separate Cabinet from Parliament posts.



## **b. Proposals to the executive authority**

1. Coordinate cooperation and information exchange between the Court of Accounts, Central Inspection, the Civil Service Board, and the Higher Disciplinary Committee, as well as reinforce their powers, activate their roles, and provide them with competent employees.
2. Commit to the implementation of the laws related to the appointment, transfer, and promotion of employees without interfering in the promotion process, which falls within the competence of the Civil Service Board. Seniority, grades, diplomas, and professional background should be used as criteria in this regard.
3. Develop and adopt public awareness programs for ministries such as the Ministry of Information, Culture, Education and Higher Education, Social Affairs, Youth and Sports, etc.
4. Set an example by preserving public funds, transparency and credibility, properly implementing tasks and duties, and recognizing rights.
5. Standardize mechanisms related to the categorization of suppliers and contractors, and the exclusion of some from participation in public procurement, and establish an open database comprising information on the number of projects undertaken by the contractors each year, their respective values, locations, etc.
6. Adopt and classify job descriptions to clearly define the roles and responsibilities of public officials, evaluate their performance, and apply the reward and punishment principle.
7. Adopt a new salary scale based on job descriptions inclusive of all functional sectors.
8. Establish and adopt new codes of ethics for employees and disseminate them to all public administrations.
9. Conduct anti-corruption awareness campaigns and call on syndicates and civil society bodies to participate.
10. Enact the draft Law on Conflict of Interest in the Council of Ministers.
11. Assign ministerial portfolios based on the fields of specialization of the candidates.
12. Comply with the provisions of the Law of Public Sector Employees promulgated by Decree Law No. 112/1959 and its amendments, regarding the appointment, promotion, advancement, transfer, secondment, and retirement of public officials.
13. Fill vacant positions in public administrations and institutions, particularly senior positions.
14. Recognize the Civil Service Board as the only body responsible for appointments in the official administrative cadre, public administrations, and municipalities, and address the root causes of informal labor in the public sector.

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15. Form a national multidisciplinary team to establish a digital platform for an open government that places citizens at the center of its interests and provides a single-window or one-stop shop for all government services provided to citizens, private sector, and all other parties, including administrations at the local level.
  16. Conduct a survey among the representatives of syndicates and civil society to gather information on issues related to fighting corruption.
  17. Develop general and specific standard bidding documents for the public procurement of works, supplies, and services carried out by the various public administrations through tenders, requests for proposals, and consensual agreements.
  18. Enhance the capacities of the public administrations, both in terms of quantity and quality, to increase their autonomy in conducting effective oversight and supervising the contractors in public procurement, thus reducing commissioning and costs.
  19. Implement Law 664 of 5/2/2005 on the appointment of the Ombudsman and their assisting body, and implement the relevant application decrees.
  20. Develop and adopt a national indicator that monitors the corruption phenomenon, according to international standards and methodologies.
  21. Adopt the concept of Open Data and call on ministries to appoint information officers, establish websites, and implement the Right of Access to Information Law.

### **c. Proposals to the Judicial authority**

1. Give a free hand to the judiciary to prosecute and punish perpetrators away from any political, partisan, or other interference.
2. Improve the theoretical and practical curricula in the Institute of Judicial Studies and incorporating new study materials and methods on fighting corruption in related fields crucial to the Lebanese judiciary such as public finance, accounting, information, communications, and the environment.
3. Adopt accurate scientific standards for the transfer of judges and apply a schedule of periodic transfers.
4. Distribute judges among judicial committees and committees of judicial nature in a transparent and equitable manner.
5. Expedite the resolution of lawsuits and deliver judgments in a timely manner.
6. Establish a clear and integrated schedule of court sessions and reduce the time between them.
7. Give due consideration to corruption cases and address them without delay, and activate the role of the Judicial Inspection Authority.

## **2. Proposals to oversight bodies and the Higher Disciplinary Committee**

### **a. General proposals**

Corruption poses a dangerous threat to public administration activities. Thus, it is imperative for state officials to fight it and contain its negative social and economic impacts as much as possible, by strengthening the role of administrative and financial oversight bodies and granting them sufficient independence, in addition to extending their powers to address distortions, curb the risks to public administrations, secure public funds, and ensure their proper use. The role of oversight bodies in this field is based on the following:

#### **1. Providing the necessary legal foundations to ensure effective oversight**

Oversight bodies must be supported by an adequate and integrated legal system to ensure effective oversight; nonexistent or ambiguous existing laws and regulations would provide an opportunity for senior public officials to use their discretion to cloak corrupt acts and obtain illicit private gains. It is therefore necessary for higher oversight bodies to highlight these legal deficiencies, and coordinate with state authorities (the Parliament and Council of Ministers) to address their root causes by both developing new provisions and amending and improving the existing ones. This will address shortcomings and remove ambiguity, in accordance with the modern scientific concepts of proper legal and administrative work, based on the principles of justice, impartiality, and fairness.

#### **2. Establishing a suitable environment for effective oversight**

The higher oversight bodies should work to establish a suitable environment for effective oversight in cooperation with forces of society including intellectuals, opinion leaders, and those considered social elites, in addition to civil society bodies active in the fight against corruption. Together, these entities should work to raise awareness at the level of the public administrative body, private institutions, and various sectors and segments of society about the dangers of widespread administrative and financial corruption, its negative impacts on public life and economic recovery plans, and on the implementation of social programs and the achievement of the desired results.

#### **3. Improving reform tools and development programs**

Higher oversight bodies should intensify their cooperation with authorities to restructure, enhance, and increase the capacity of the public administration to reflect the tasks and objectives assigned to it. Oversight bodies should provide public administration with the necessary human and financial capacities with the goal of improving its performance and increasing its productivity at the lowest possible cost and effort. Further, oversight bodies should continue to cooperate and coordinate amongst themselves, as well as with public administrative bodies and judicial bodies responsible for the investigation and sentencing of corruption acts. Such cooperation would help contain corruption, limit its outcomes, and punish corrupt individuals.



#### 4. Modernizing oversight methods and techniques

In the light of the information revolution and the development of business, information, and communications technology, oversight bodies should work to benefit from these advancements in order to improve oversight methods and techniques. Oversight bodies should incorporate new technologies into their work, as well as train employees in the efficient use of modern methods and techniques. Inclusion of new technology could enhance the work of the oversight bodies to help guarantee full transparency, speed, and accuracy.

### b. Special proposals

#### 1. Court of Accounts

- Strengthen the power and capacities of the Court of Accounts and grant it the power to monitor performance, establish systems for the assessment of the quality of works, supplies, and services provided to the administration, and last, extend its oversight to all parties involved in the management of public funds
- Fill vacant positions of the judiciary, oversight, administrative, and technical cadres of the Court of Accounts.
- Activate the ex-post judicial control of accounts and employees, and raise the value of fines imposed by the Court of Accounts on public officials for the violations committed, in proportion to the impact of damages and losses affecting public funds
- Communicate the special reports issued by the Court of Accounts to the President of the Republic, the Speaker of Parliament, the Prime Minister, and members of Parliament, and publish them on its website and in the media.
- Issue necessary organizational provisions for preparing the accounts of the bodies subject to control, identify and unify the bookkeeping methods and submit them to the Court of Accounts for audit and review, while at the same time update the methods of control, enhance its techniques and adopt international auditing standards, in order to expedite the control process and increase its effectiveness.

#### 2. Civil Service Council

- Adopt a public sector salaries policy according to well-defined and clear scientific, economic, and social criteria, and expedite the enactment of laws related to the various salary scales as a means of reducing corruption including the acceptance of bribes, gratuities, and gifts of all sorts.
- Establish new foundations for the Lebanese public administration, develop and modernize outdated work cadres, and issue the necessary legal provisions including on civil aviation, the media, housing, communications, etc.
- Establish a system of incentives in the public sector where employees are rewarded based on their productivity and performance, that commits the administration to providing the relevant agencies with an assessment of each employee and the allowances they receive.



- Fill vacant positions in accordance with the established legal mechanisms through appointing personnel, or appoint officers in charge or commissioning and other mechanisms mentioned in the personnel regulations, and prohibiting commissioning.
- Simplify administrative procedures and standardize related transactions.
- Apply the single-window system or one-stop shop in public administrations, institutions, and municipalities.

### 3. Central Inspection

- Enhance the role and independence of Central Inspection to enable it to fulfill its duties to hold public officials accountable for misconduct and administrative violations.
- Activate the role of the Tenders Administration, providing it with the necessary specialized human resources, granting it the necessary power to ensure the transparency of public procurement, and strengthening its independence and ability to detect deficiencies and collusions among bidders before awarding the contracts.
- Adopt a performance evaluation system for public officials, develop periodic reports on their efficiency, and impose penalties on them when necessary.

### 4. Higher Disciplinary Committee


- Activate the role of the Higher Disciplinary Committee by enhancing its mandate and developing its structure to enable it to carry out its duties.
- Amend the human resources structure of the Higher Disciplinary Committee and introducing new positions as needed.

## 3. Common and miscellaneous proposals

### a. Proposals to the media

Official and private media play a pivotal role in raising citizens' awareness and empowering them to fight corruption.

1. All types of media must participate in promoting a culture of integrity and anti-corruption; investigative journalism must be encouraged
2. Raise public awareness to encourage citizens to reject dealing with corrupt individuals or falling into their corrupt practices.
3. Highlight important corruption cases and portray them in an objective and scientific manner.

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4. Raise citizens' awareness of their rights, urge them to report corrupt individuals and inform them of the process of filing complaints upon discovery of corruption cases.
  5. Broadcast radio and television programs and issue specialized publications on corruption issues and anti-corruption measures.

#### **b. Proposals to educational institutions**

1. Integrate content on integrity and anti-corruption into educational programs and curricula.
2. Raise awareness of the need to preserve the public funds and the property of the public administration and to manage them judiciously.

#### **c. Proposals to the private sector and economic bodies**

1. Enhance competition as a means of limiting monopolistic agreements among suppliers and restricting the recourse to single source procurement to cases of extreme necessity.
2. Encourage the private sector to foster a culture of anti-corruption and to adhere to the principles of integrity, transparency, and accountability, all the while highlighting the importance of the partnership between the public and private sectors.
3. Strengthen corporate governance in the private sector.
4. Enact the Public and Private Partnership Law.

**While these proposals should be implemented, comparative experiences emphasize the importance of concentrating efforts on priority sectors at a first stage, taking into account the extent of corruption in these sectors and relying on scientific analysis and on a participatory approach. Such sectors may include: customs, taxes, cadastre departments, energy, and environment.** This approach can include:

- Monitoring instances of corruption in each sector, diagnosing them, and determining their causes and costs.
- Identifying the strengths, weaknesses, opportunities, and threats (SWOT analysis).
- Setting well-defined and achievable objectives in the short, medium, and long terms and determining measures that should be taken to engage all concerned parties in the fight against corruption, namely oversight bodies, law enforcement agencies, governmental bodies, and civil society organizations.
- Establishing practical mechanisms for the implementation of the stated objectives, monitoring their implementation, and revising them periodically.

## Annex 2

### **Proposals for a national anti-corruption strategy (November 2013)**

**Prepared by the committee tasked with the development of proposals for the national anti-corruption strategy and established by the Minister of State for Administrative Reform's Decision No. 85 dated April 19, 2013**

As part of Lebanon's efforts to fight corruption and within the framework of its endeavors to implement the UNCAC, His Excellency the Minister of State for Administrative Reform, Mohammad Fneish, formed a committee to develop proposals for the National Anti-Corruption strategy [Decision No. 85 dated 19/4/2013 (Document 1) amended by Decision No. 104 dated 9/5/2013 (Document 2)], composed of the following members: Judge Arlette Jreissati, Antoine Gebran, Judge Nada Al-Asmar, Judge Abdallah Ahmad, Judge Jad Maalouf, Judge Bassam Wehbe, Attorney Ali Berro, Attorney Charbel Sarkis, Nasser Asrawi, and Salim Maksour. The Minister asked the UNDP-ACIAC to support the work of this Committee, and this has been done through the provision of technical advice and logistic support with the participation of Arkan El-Seblani, Hussein Hassan, and Karine Badr.

The Committee held eight meetings from 3/6/2013 to 10/12/2013, at the Office of the Minister of State for Administrative Reform (OMSAR), outside official working hours. In order to facilitate and expedite the work, the committee established a focus group to revise, adapt, and categorize members' proposals. The focus group held three special meetings from 26/7/2013 to 6/8/2013 and submitted its recommendations to the committee which reviewed, revised, and adopted them in the form of an introduction and six sections as follows:

- (1) Completing the legislative framework to prevent and fight corruption
- (2) Supporting the integrity of public officials
- (3) Strengthening oversight and accountability systems
- (4) Preventing corruption in administrative transactions
- (5) Preventing corruption in public procurement
- (6) Raising awareness of the society and engaging it in the efforts to promote integrity and fight corruption

His Excellency the Minister of State for Administrative Reform reviewed the Committee's proposals and approved their publication for use as a platform for developing a national anti-corruption strategy in Lebanon.




## Introduction

The development of a National Anti-corruption Strategy in Lebanon is critical to streamlining anti-corruption efforts and increasing their effectiveness to achieve outcomes that support the establishment of a state of law and institutions and respond to the citizens' aspirations for a better life. The Strategy has been developed in light of growing internal calls to limit the spread of corruption and of Lebanon's endeavors to fulfill its relevant international obligations related to the UNCAC, and to activating its regional presence within the framework of the ACINET.

The committee tasked with developing proposals for the National Anti-Corruption Strategy considered that the success of such a strategy depends on genuine will on the part of the political, economic, and social leaders in Lebanon to reform; will that translates into policies, laws, regulations, and procedures consistent with international standards that help create tangible practices. The committee considered that progress in the fight against corruption can begin despite insufficient conditions and that this strategy is required for any progress given that it constitutes a starting point to consolidate the foundations of integrity in public and private sectors, including in terms of compliance with the principles of transparency, responsibility, and accountability.

In this context, the committee developed its proposals for a national anti-corruption strategy, and recommended the following:

- Develop an effective and enforceable national anti-corruption strategy coordinated between relevant stakeholders which entrenches the principles of community participation, rule of law, and good governance, and prevents the wasting of public funds.
- Formally adopt the proposals of the committee and start work on publishing and implementing them while working to integrate them into the national strategy upon its development.
- Draw on the accumulated experience of the Ministry of State for Administrative Reform to elaborate an integrated process for developing this strategy, taking into account regional and international recommendations regarding the development, implementation, and monitoring of national anti-corruption strategies, including the Sanaa Recommendations 2010 (Document 3) and the Kuala Lumpur Declaration 2013 (Document 4).
- Find a permanent mechanism to conduct periodic assessment of Lebanon's commitment to the UNCAC, given the importance of this assessment in informing the Strategy and monitoring the progress made, and completing the self-evaluation as soon as possible to cover Chapters II (Preventive Measures) and V (Asset Recovery) of the Agreement, after Chapters III (Criminalization and Law Enforcement) and IV (International Cooperation) have been successfully assessed.
- Promote cooperation with UNDP to support the implementation of all the above recommendations and work to encourage the broad participation of donors and regional and international organizations in these efforts, especially the **ACINET**.




In addition, the committee stresses that the national strategy should (1) include preventive, punitive, and awareness-raising measures, (2) adopt sectoral approaches by identifying priority sectors and supporting them to enhance their integrity and protect them from corruption, and finally (3) combine rules-based approaches – that set rules and sanction non-implementation – and values-based approaches that seek to foster honest behavior among all concerned parties in the state and society.

## Proposals

### 1. Complete the legislative framework to prevent and fight corruption

1. Issue anti-corruption laws, including in particular the following draft laws and bills: the Right of Access to Information, the Whistleblowers' Protection, the Establishment of a National Anti-Corruption Institution, Public Procurement, and Illicit Enrichment.
2. Implement the provisions of the UNCAC and giving due legal course to the two draft laws on (a) the Conflict of Interest, and (b) amending some articles of the Penal Code, the Code of Criminal Procedure, and the Code of Civil Procedure, in conformity with the provisions of the UNCAC.
3. Draft and issue a law that regulates the asset recovery process giving effect to the UNCAC provisions.
4. Amend Article 64 of the Court of Accounts Law to allow the publication of its final reports ,and communicate them to the President of the Republic, the Speaker of Parliament, the Prime Minister, and the Ministers and Members of Parliament.
5. Issue the necessary laws and regulatory decrees to structure or restructure public administrations and institutions where necessary, including (a) the Ministry of Information, (b) the Ministry of Culture, (c) the Railways and Joint Transport Authority, and (d) the Public Corporation for Housing, (e) the Port of Beirut, and (f) the High Relief Commission.
6. Reconsider the legal system that governs public finances and replace it with specialized laws that meet the needs and oversight requirements of modern financial management, provided that separate laws are issued for budget preparation, public procurement, and public accounting
7. Update the financial laws and regulations that govern the municipalities' work and standardize them where necessary.
8. Update the financial laws and regulations that govern the work of the public institutions and standardize them where necessary.

- 
9. Update the laws and regulations related to the identification of public property in unsurveyed areas (Decision No. 144 dated 10/6/1925) and to the management and sale of the private state immovable property (Decision No. 275 dated 25/5/1926), and standardize them where necessary.
  10. Give due course to the e-government executive program, including the adoption of the e-signature and other relevant legislations.


## **2. Support the integrity of public officials<sup>53</sup>**

1. Develop codes of ethics for public sector employees and for judiciary employees, update existing codes, and establish effective mechanisms to ensure adherence to them
2. Adopt an equitable salary policy based on competency that ensures decent livelihoods for public sector employees and evolves according to a clear and specific scientific mechanism, and create an incentive system linked to the productivity and performance of public sector employees.
3. Publish the salaries and allowances of public officials and establish effective systems that allow the disclosure of their financial status.
4. Provide employees who are in contact with citizens with a badge that identifies them, and require them to wear it during official working hours.

## **3. Strengthen oversight and accountability systems**

1. Fill vacant positions – especially first- and second-grade positions – in the judiciary and the public sector and in the boards of directors of public institutions and regulatory bodies, in accordance with transparent criteria based on the principles of efficiency and specialization, and within the framework of a universal approach to modernize the public administrations and institutions.
2. Establish a mechanism to prosecute ministers and public office holders in charge of public spending and allow them to be tried before ordinary courts where necessary.
3. Publish the implementation of revenues and expenditures of the public administrations, institutions, municipalities, and legal persons of public law in a timely and continuous manner in order to facilitate access to them, and adopt a mechanism to ensure compliance with the publication requirement.
4. Establish and activate internal control units within administrations, public institutions, and municipalities which fall under the mandate of the Court of Accounts.
5. Amend laws regulating the work of oversight bodies in order to enhance their role, especially Central Inspection and the Court of Accounts, and increase coordination between them.

<sup>53</sup>. The United Nations Convention against Corruption includes a broad definition of “Public Official”. See Article 2 (a).


- 
6. Appointing an Ombudsman and an assisting body in accordance with Law 664 of 5/2/2005, and issue the necessary provisions, where necessary, to help them carry out their duties.

#### **4. Prevent corruption in administrative transactions**

1. Develop one or more paper and electronic manuals to (a) provide citizens with information regarding any transaction they wish to carry out in official administrations, including details of required documents, methods of submission, fees and payment methods, transactions processes, completion times, etc., and (b) allow citizens to submit complaints to the competent authority, according to the content of the transactions and the distribution of functions, if a transaction is delayed or blocked.
2. Apply a single-window system or one-stop shop in the public administrations.
3. Redesign and simplify administrative procedures and reduce the administrative burden, thus contributing to a reduction of discretion and thereby corruption.
4. Facilitate the electronic submission and follow-up of transactions for citizens.
5. Putting studies prepared in the public sector, along with the databases, geographic information systems and legal provisions at the disposal of concerned parties to support decision-making in public administrations and institutions, to ensure the proper functioning of public facilities.

#### **5. Prevent corruption in public procurement**

1. Improve the skills of public officials responsible for public procurement, at the following levels:
  - financial, administrative, and economic planning
  - needs identification of each administration
  - public procurement operations
  - conflict management in public procurement
  - performance standards and measurement indicators formulation
  - monitoring of the implementation of operations
  - internal and external audit methods development
  - accounting
  - transferring the reception process from a purely formal procedure to an actual reception with precise criteria consistent with the provisions of the bidding documents.
2. Develop and issue new general and specific standard bidding documents for public procurement of works, supplies, and services carried out by public administrations, taking into consideration what has already been achieved.
3. Enhance competition as a means of limiting monopolistic agreements and exclusive agencies and restrict repeated recourse to single source procurement to cases of extreme necessity.

- 
4. In parallel with the enactment of a public procurement law that respects the principles of transparency and effectiveness, work to redesign the stages and procedures of public procurement transactions to simplify and clarify them, in order to contribute to a reduction in discretion and thereby corruption.
  5. Standardize the mechanisms related to the categorization of suppliers and contractors and to the exclusion from participation in public procurement, and establish an open database comprising information on the number of projects undertaken by the contractors each year, their respective values, locations, etc.

## **6. Raise awareness in Lebanese society and engaging it in the effort to promote integrity and fight corruption**

1. Engage civil society and business community institutions and bodies active in the national fight against corruption.
2. Launch a campaign to educate society on the dangers of widespread corruption and urge citizens to report corrupt individuals.
3. Give due consideration to World Anti-Corruption Day (9 December) and engage in various awareness-raising activities on the risks of corruption and to the efforts aimed to spread a culture of anti-corruption.
4. Compile existing studies and conduct other studies where necessary on corruption and its negative repercussions on the state of institutions, democracy, and growth, and identify areas with the highest levels of corruption.
5. Integrate content on anti-corruption values and mechanisms into the educational programs and curricula at all levels of education.
6. Promote cooperation between official bodies and the media to spread a culture of anti-corruption and encourage investigative journalism.
7. Encourage the private sector to spread a culture of anti-corruption and to adhere to the principles of integrity, transparency, and accountability, all the while highlighting the importance of the partnership between public and private sectors.



### Annex 3:

## Decisions related to the Ministerial Anti-Corruption Committee and its supporting technical committee

Decision No. 156/2011 dated 27/12/2011

### Establishing a Ministerial Anti-Corruption Committee

The President of the Council of Ministers,

Based on Decree No. 5817 dated 13/6/2011 (Appointing Mr. Najib Mikati, President of the Council of Ministers),

Based on Correspondence 446/S/2011 dated 15/12/2011, issued by the Minister of State for Administrative Reform,

Based on the requirements of public interests,

Decides the following:

**Article 1:** Establishing a ministerial anti-corruption committee, headed by the President of the Council of Ministers, and the Minister of State for Administrative Reform as a deputy, and composed of the following members:

- Minister of Finance
- Minister of Justice
- Minister of Interior and Municipalities

**Article 2:** The committee shall be assigned the following tasks:

- Oversee the development of a National Anti-Corruption Strategy and an implementation plan therefore as well as indicating the government's policies and objectives necessary for the implementation of the Strategy.
- Monitoring Lebanon's commitments to the United Nations Convention Against Corruption, including participation to the Conference of State Parties of the Convention and to its open-ended working groups and to the activities of the Convention's implementation Review Mechanism.
- Strengthen Lebanon's participation in the Arab Anti-Corruption and Integrity Network (ACINET) and coordinate official participation to its activities.
- Coordinate with donors as well as with regional and international organizations that provide support to Lebanon's efforts to fight corruption to ensure effective cooperation.
- Follow up on the legislative process in all matters relating to corruption and effective enforcement through coordination with the Minister of State for Parliamentary Affairs.



Decision No. 156/2011 dated 27/12/2011

**Establishing a Ministerial Anti-Corruption Committee** (continues)

**Article 3:** The committee shall be convened by its chairman at least once every three months, or as often as deemed necessary, to discuss the relevant topics on its agenda. The committee may invite any person whose opinion is deemed necessary to participate in its meetings.

**Article 4:** The committee shall be assisted in its work by a supporting technical committee placed under its supervision.

**Article 5:** The Office of the Minister of State for Administrative Reform shall act as the secretariat of the committee.

**Article 6:** This decision is informed as it deems necessary.

Beirut, 27/12/2011

**Najib MIKATI**  
President  
Council of Ministers



**Decision No. 157/2011 dated 27/12/2011 and its amendments**  
**Establishing a Technical Committee Supporting the Ministerial**  
**Anti-Corruption Committee**

The President of the Council of Ministers,

Based on Decree No. 5817 dated 13/6/2011 (Appointing Mr. Najib Mikati, President of the Council of Ministers),

Based on Decision No. 156/2011 dated 27/12/2011 (Establishing a Ministerial Anti-Corruption Committee),

Based on correspondence 446/S/2011 dated 15/12/2011, issued by the Minister of State for Administrative Reform,

Based on the requirements of public interests,


Decides the following:

**Article 1:** Establishing a Technical committee supporting the Ministerial Anti-Corruption Committee, headed by the Minister of State for Administrative Reform, and composed of the following members:

- Economic and development advisor to the President of the Council of Ministers
- Representative from the Ministry of Justice
- Representative from the Ministry of Finance
- Representative from the Ministry of Interior and Municipalities
- Representative from the Higher Judicial Council
- Representative from the Public Prosecution
- Representative from the Court of Audit
- Representative from the Central Inspection
- Representative from the Civil Service Council
- Representative from Higher Disciplinary Council
- Representative from the Administrative Reform
- Representative from the Central Bank of Lebanon
- Members of the Committee shall be appointed by the heads of administrations or by the Minister in charge.

**Article 2:** The committee shall be assigned the following tasks:

- Conduct the self-assessment for the implementation of the United Nations Convention Against Corruption and ensure the participation of Lebanon in the Convention's Implementation Review Mechanism.



**Decision No. 157/2011 dated 27/12/2011 and its amendments**  
**Establishing a Technical Committee Supporting the Ministerial**  
**Anti-Corruption Committee (continues)**

- Coordinate the compilation of legal texts and documents and any information related to fighting corruption available at the different institutions in the Lebanese State and assess the said information to use it by the Committee to carry out its mandate.
- Conduct regular consultations with Members of Parliament and with representatives of civil society organizations, the media, the private sector, and regional and international partners to benefit from their expertise, experience, and views.
- Attend, systematically, regional and international conferences and meetings on anti-corruption including activities organized by the Arab Network Against Corruption (ACINET) and those related to the implementation of the United Nations Convention Against Corruption.
- Submit proposals, carry out studies and reports, and organize activities and consultations, as deemed necessary, to develop a National Anti-Corruption Strategy and an implementation plan therefore.
- Provide required recommendations to support the work of the Ministerial Committee and advise the latter on any decision required needing consideration.

\



**Decision No. 108/2014 dated 30/04/2014**

**Adding a member representing the State Shura Council in the Established Technical Committee by virtue of Decision No. 157/2011 dated 27/12/2014**

The President of the Council of Ministers,

Based on Decree No. 11216 dated 15/2/2014 (Appointing Mr. Tamam Salam, President of the Council of Ministers),

Based on Decision No. 156/2011 dated 27/12/2011 (Establishing a Ministerial Anti-Corruption Committee),

Based on Decision No. 157/2011 dated 27/12/2011 (Establishing a Technical Committee Supporting the Ministerial Anti-Corruption Committee),

Based on Decision No. 71/2014 dated 27/3/2014 amending the name of the representative of the Presidency of the Council of Ministers in the established committee by virtue of Decision No. 157/2011 dated 27/12/2011 (Establishing a Technical Committee Supporting the Ministerial Anti-Corruption Committee),

Based on correspondence 6268/2014 dated 9/4/2014 by the State Shura Council,

Based on the correspondence 142/S/2014 dated 23/04/2014, by the Minister of State for Administrative Reform,

Decides the following:

**Article 1:** Judge Samih Maddah, representative of the State Shura Council, shall be added to the established committee by virtue of Decision No. 157/2011 dated 27/12/2014 (Establishing a Technical Committee Supporting the Ministerial Anti-Corruption Committee).

**Article 2:** This decision is informed as it deems necessary.

Beirut, 30/04/2014

**Tamam Salam**  
President  
Council of Ministers



Decision No. 184 dated 13/11/2012

Establishing a technical sub-committee to respond to the self-assessment  
(United Nations Convention Against Corruption)

The Minister of State for Administrative Reform,

Based on Decree No. 5818 dated 13/6/2011 (cabinet formation),

Based on the President of the Council of Minister's Decision No. 156/2011 dated 27/11/2011  
(on establishing a Ministerial Anti-Corruption Committee).

Based on the President of the Council of Minister's Decision No. 157/2011 dated 27/11/2011  
(on establishing a Technical Committee supporting the Ministerial Anti-Corruption  
Committee).

Based on the requirements of public interests,

Decides the following:

**Article 1:** Establishing a technical sub-committee from among the members of the technical  
committee supporting the Ministerial Anti-Corruption Committee, as follows:

- |                           |           |
|---------------------------|-----------|
| - Judge Arlette Jreissati | President |
| - Mr. Antoine Gebran      | Member    |
| - Judge Nada Al Asmar     | Member    |
| - Judge Bassam Wehbe      | Member    |
| - Mr. Salim Maksour       | Member    |
| - Lawyer Charbel Sarkis   | Member    |



**Decision No. 184 dated 13/11/2012**


**Establishing a technical sub-committee to respond to the self-assessment  
(United Nations Convention Against Corruption) (continues)**

**Article 2:** The committee is tasked to prepare the required answers for the self-assessment within the set deadline, no later than the second half of next December, and to submit the required report to the Minister of State for Administrative Reform to take the necessary actions.

**Article 3:** Lawyer Charbel Sarkis shall act as the secretariat of the committee.

**Article 4:** This decision is informed as it deems necessary.

Minister of State for Administrative Reform  
**Mohammad Fneish**



**Decision No. 85 dated 19/4/2013 and its amendments**  
**Establishing a committee tasked to develop proposals for the National  
Anti-Corruption Strategy**

The Minister of State for Administrative Reform,

Based on Decree No. 5818 dated 13/6/2011 (cabinet formation),

Based on the President of the Council of Minister's Decision No. 157/2012 dated 27/11/2011 (on establishing a Technical Committee, headed by the Minister of State for Administrative Reform, supporting the Ministerial Anti-Corruption Committee),

Decides the following:

**Article 1:** Establishing a technical committee to support the Minister of State for Administrative Reform:

Judge Arlette Jreissati	(Ministry of Justice)
Mr. Antoine Gebran	(Civil Service Council)
Judge Nada Al Asmar	(Discriminatory Public Prosecution)
Judge Jad Maalouf	(Ministry of Justice)
Judge Bassam Wehbe	(Court of Accounts)
Lawyer Ali Berro	Advisor to the Minister of State for Administrative Reform
Lawyer Charbel Sarkis	Legal Advisor to the Minister of State for Administrative Reform
Mr. Nasser Issrawi	Head of the Technical Coordination Unit at the Ministry of State for Administrative Reform





**Decision No. 85 dated 19/4/2013 and its amendments**  
**Establishing a committee tasked to develop proposals for the National  
Anti-Corruption Strategy** (continues)

**Article 2:** The committee is tasked to develop proposals for the National Anti-Corruption Strategy and its implementation plan as per the decision of the Prime Minister.

**Article 3:** The committee is granted a period of two months to finalize the required, and to submit its proposals to the Minister of State for Administrative Reform in preparation to be presented to the relevant ministerial committee.

**Article 4:** The Ministry of State for Administrative Reform shall act as the secretariat of the committee.

**Article 5:** This decision is informed as it deems necessary.

Minister of State for Administrative Reform  
**Mohammad Fneich**



Decision No. 63 dated 23/5/2014

Establishing a sub-committee for the assessment of the implementation by Lebanon of asset recovery measures included in Chapter V of the United Nations Convention against Corruption

The Minister of State for Administrative Reform,

Based on Decree No. 11217 dated 15/2/2014 (cabinet formation),

Based on Legislative Decree No. 112 dated 12/6/1959 (Civil Servants Regulations),

Based on Decree No. 3950 dated 27/4/1960 and its amendments (Compensation and Assistance Regulations),

Based on Decision No. 157/2011 dated 27/12/2011 (Establishing a Technical Committee Supporting the Ministerial Anti-Corruption Committee) and its amendments,

Based on the Council of Minister's Decision No. 4 dated 31/3/2014 (Delegating the Minister of State for Administrative Reform establishing internal and external committees from public administrations),

After approval from all line presidents,

Decides the following:

**Article 1:** Establishing a sub-committee, from among the members of the technical committee established by virtue of Prime Minister's Decision No. 157/2011, for the assessment of the implementation by Lebanon of asset recovery measures included in Chapter V of the United Nations Convention against Corruption, as follows:



**Decision No. 63 dated 23/5/2014**

**Establishing a sub-committee for the assessment of the implementation by Lebanon of asset recovery measures included in Chapter V of the United Nations Convention against Corruption (continues)**

<b>Name</b>	<b>Monthly Remuneration</b>	<b>Total Remuneration</b>
Judge Said Mirza (President)	750.000 L.L.	3.000.000 L.L.
Judge Arlette Jreissati	750.000 L.L.	3.000.000 L.L.
Judge Nada el Asmar	750.000 L.L.	3.000.000 L.L.
Mrs. May Najjar	750.000 L.L.	3.000.000 L.L.
Mr. Walid El Chaaer	750.000 L.L.	3.000.000 L.L.
Lawyer Charbel Sarkis (Secretary)	750.000 L.L.	3.000.000 L.L.
<b>Total</b>	<b>3,750.000 L.L.</b>	<b>15.000.000 L.L.</b>

**Article 2:** The committee is granted a period of four months to develop a report on the matter and to submit it to the Minister of State for Administrative Reform.

**Article 3:** This decision is considered effective from the date of its issuance.

**Article 4:** The mentioned remuneration is granted as per the following: Part (1) of the Clause (3) of Chapter (18), Functions (160), item (13), section (3), sub-section (9), expenses of Minister of State for Administrative Reform.

**Article 5:** This decision is informed as it deems necessary.

Minister of State for Administrative Reform  
**Nabil de Freige**



**Decision No. 64 dated 23/5/2014**

**Establishing a sub-committee for the assessment of the implementation by Lebanon of the preventive measures included in Chapter II of the United Nations Convention against Corruption**

The Minister of State for Administrative Reform,

Based on Decree No. 11217 dated 15/2/2014 (cabinet formation),

Based on Legislative Decree No. 112 dated 12/6/1959 (Civil Servants Regulations),

Based on Decree No. 3950 dated 27/4/1960 and its amendments,

Based on the Council of Minister's Decision No. 4 dated 31/3/2014 (Delegating the Minister of State for Administrative Reform establishing internal and external committees from public administrations),

Based on Decision No. 157/2011 dated 27/12/2011 (Establishing a Technical Committee Supporting the Ministerial Anti-Corruption Committee) and its amendments,

Decides the following:

**Article 1:** Establishing a sub-committee, from among the members of the technical committee established by virtue of Prime minister's Decision No. 157/2011 and its amendments, for the assessment of the implementation by Lebanon of preventive measures included in Chapter II of the United Nations Convention against Corruption, as follows:

<b>Name</b>	<b>Monthly Remuneration</b>	<b>Total Remuneration</b>
Judge Bassam Wehbe (President)	750.000 L.L.	3.000.000 L.L.
Mr. Antoine Gebran	750.000 L.L.	3.000.000 L.L.
Judge Ziad Ayoub	750.000 L.L.	3.000.000 L.L.
Mr. Hussein Ramlawi	750.000 L.L.	3.000.000 L.L.
Lawyer Charbel Sarkis (Secretary)	-----	-----
<b>Total</b>	3.000.000 L.L.	12.000.000 L.L.



**Decision No. 64 dated 23/5/2014**

**Establishing a sub-committee for the assessment of the implementation by Lebanon of the preventive measures included in Chapter II of the United Nations Convention against Corruption (continues)**

**Article 2:** The committee is granted a period of four months to develop a report on the matter and to submit it to the Minister of State for Administrative Reform.

**Article 3:** This decision is considered effective from the date of its issuance.

**Article 4:** The mentioned remuneration is granted as per the following: Part (1) of the Clause (3) of Chapter (18), Function (160), item (13), section (3), sub-section (9), expenses of Minister of State for Administrative Reform.

**Article 5:** This decision is informed as it deems necessary.

Minister of State for Administrative Reform  
**Nabil de Freige**



**Decision No. 174 dated 18/02/2016**

**Establishing a Committee for the development of a National Anti-Corruption Strategy**

The Minister of State for Administrative Reform,

Based on Decree No. 11217 dated 15/2/2014 (Cabinet Formation)

Based on the United Nations Convention Against Corruption that Lebanon joined as per Law No. 33 dated 16/10/2008,

Based on the President of the Council of Minister's Decision No. 156 dated 27/12/2011 (on establishing a Ministerial Anti-Corruption Committee)

Based on the President of the Council of Minister's Decision No. 157 dated 27/12/2011 (on establishing a Technical Committee supporting the Ministerial Anti-Corruption Committee),

Based on the joint meeting of the two above mentioned committees headed by the Prime Minister on 14/1/2016,

Decides the following:

**Article 1:** A focus group is established from the members of the Technical Committee as follows:

- **Judge Said Mirza**, Legal Advisor of the Prime Minister, as President
- **Judge Nada Al-Asmar**, Discriminatory Public Prosecution
- **Judge Bassam Wehbe**, Public Prosecution at the Court of Audit
- **Judge Carl Irani**, Legal Advisor at the Ministry of Interior and Municipalities
- **Dr. Walid al-Shaer**, Head of the legal and follow up of complaints department at the Ministry of Finance
- **Mr. Charbel Sarkis**, Secretary of the committee, Advisor to the Minister of State for Administrative Reform, as Secretary



**Decision No. 174 dated 18/02/2016**

**Establishing a Committee for the development of a National Anti-Corruption Strategy (continues)**

**Article 2:** The committee is tasked to develop a national Anti-Corruption Strategy and a plan for its implementation.

**Article 3:** The committee, within the framework of its mandate, can conduct consultative meetings with Members of Parliament, civil society, and the private sector to receive their opinions and comments.

**Article 4:** The committee is granted a period of four months, renewable, to achieve the required and to submit its report to the Minister of State for Administrative Reform, in preparation to present the proposed Strategy to the relevant ministerial committee.

**Article 5:** Each member of the committee shall be reimbursed on a monthly basis to be disbursed as per Part (1), Clause (3), Chapter (18), Function (160), item (13), section (3), sub-section (9), expenses of the Minister of the State for Administrative Reform as follows:

<b>Name</b>	<b>Monthly Remuneration</b>	<b>Total Remuneration</b>
Judge Said Mirza	750.000 L.L.	3.000.000 L.L.
Judge Nada Asmar	750.000 L.L.	3.000.000 L.L.
Judge Bassam Wehbe	750.000 L.L.	3.000.000 L.L.
Dr.Walid al Shaer	750.000 L.L.	3.000.000 L.L.
Judge Carl Irani	750.000 L.L.	3.000.000 L.L.
Lawyer Charbel Sarkis	750.000 L.L.	3.000.000 L.L.
<b>Total</b>	<b>4.500.000 L.L.</b>	<b>18.000.000 L.L.</b>



**Decision No. 174 dated 18/02/2016**

**Establishing a Committee for the development of a National Anti-Corruption Strategy (continues)**

**Article 5:** This decision shall be informed as it deems necessary and considered effective from the date of its issuance based on the rules.

Minister of State for Administrative Reform  
**Nabil de Freige**





**Decision No. 70 dated 04/04/2019**

**Committee to update and reformulate the plan of the National Anti-Corruption Strategy as appropriate**

**Republic of Lebanon**

Council of Ministers

General Secretariat

Record Number: 7

Decision Number: 70

Year: 2019

**From the Record of the Council of Ministers**

Location: Grand Serial

Day: Thursday

Date: 04/04/2019

**Subject:** Presentation of the Minister of State for Administrative Reform the Plan of the National Anti-Corruption

**Documents:**

- Law No. 33 dated 16/10/2008 [Authorizing the Lebanese Government to accede to the United Nations Convention Against Corruption (UNCAC)]
- Decision of the President of the Council of Minister's No. 156 dated 27/12/2011 (on establishing a Ministerial Anti-Corruption Committee)
- Decision of the President of the Council of Minister's No. 157 dated 27/12/2011 (on establishing a Technical Committee supporting the Ministerial Anti-Corruption Committee)
- Decision of the Minister of State for Administrative Reform No. 174 dated 18/2/2016 (on establishing a focus group for the development of a National Anti-Corruption Strategy from the members of the technical committee supporting the Ministerial Anti-Corruption Committee).
- Correspondence from the Minister of State for Administrative Reform No. 109/S/2019 dated 18/3/2019.



**Decision No. 70 dated 04/04/2019**

**Committee to update and reformulate the plan of the National Anti-Corruption Strategy as appropriate (continues)**

**Decision of the Cabinet:**

The Cabinet reviewed the above-mentioned documents,

Indicating that the Minister of State for Administrative Reform considers corruption as constituting a stubborn obstacle to the state building project and fighting it is one of the major reform areas on which all Lebanese unanimously agree,

And, since the ministerial statement of the 'Government of Action', committed to undertake structural reforms, including the approval of the National Anti-Corruption Strategy,

And, since implementing the aforementioned Strategy and its implementation plan constitutes one of the commitments of Lebanon in the framework of the United Nations Convention Against Corruption (UNCAC) to which Lebanon became a State party officially on 22 April 2009, and which states in its Article 5 that "Each State Party shall, in accordance with the fundamental principles of its legal system, develop and implement or maintain effective, coordinated anti-corruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency, and accountability,"

And since, approving the Strategy contributes to the achievement of the Sustainable Development Agenda (specifically Goal 16: Peace, Justice, and Strong Institutions), and form a basic lever for the Lebanese government's vision of stability, growth, and job opportunities and feeds into achieving the decisions and outcomes of the economic conference for development through reforms with institutions, known as the "CEDRE" conference,

Accordingly, the Minister of State for Administrative Reform, presents the draft National Anti-Corruption Strategy and its implementation framework to:



**Decision No. 70 dated 04/04/2019**

**Committee to update and reformulate the plan of the National Anti-Corruption Strategy as appropriate (continues)**

1. Approve it officially and adopt all necessary means to circulate among all parties related to its implementation
2. Assign the Minister of State for Administrative Reform to form working teams to follow up on the implementation, monitoring, and assessment of all related efforts as deemed necessary. The Ministry of State for Administrative Reform shall submit a progress report on the implementation of the Strategy every three months and a final report at the end of the year on results achieved.
3. Entrust the Ministry of State for Administrative Reform to develop a detailed budget for the implementation of the Strategy and its implementation plan, to be submitted to the Presidency of the Council of Ministers for approval, and to provide the necessary resources for it.
4. Request each ministry to assign a liaison officer who is responsible for coordinating the relation between the relevant Ministry or institution and the working teams established to follow up on the implementation of the strategy, and to monitor and assess it.

Accordingly,

After deliberation;



**Decision No. 70 dated 04/04/2019**

**Committee to update and reformulate the plan of the National Anti-Corruption Strategy as appropriate (continues)**

The Council of Ministers decides to establish a committee headed by the Prime Minister and comprising the deputy prime minister, Minister of Finance, Minister of Interior and Municipalities, Minister of State for Presidential Affairs, Minister of Justice, Minister of State for Parliamentary Affairs, and Minister of State for Administrative Reform, tasked to update the strategy herein and reformulate it when required, after receiving the comments sent from different ministries within a week to the Minister of State of Administrative Reform to study them, before submission to the above mentioned committee and then present it to the Council of Ministers

**Judge Mahmoud Makkieh**

Secretary General of the Council of Ministers

**Informed Parties:**

- Deputy Prime Minister
- Ministers
- Ministry of Finance
- Ministry of Interior and Municipalities
- Ministry of Justice
- Office of the State Minister of Administrative Reform
- General Directorate of the Council of Presidency
- General Directorate of the Council of Ministers
- National Archive Institute
- IT Department
- Archives

Beirut 05/04/2019



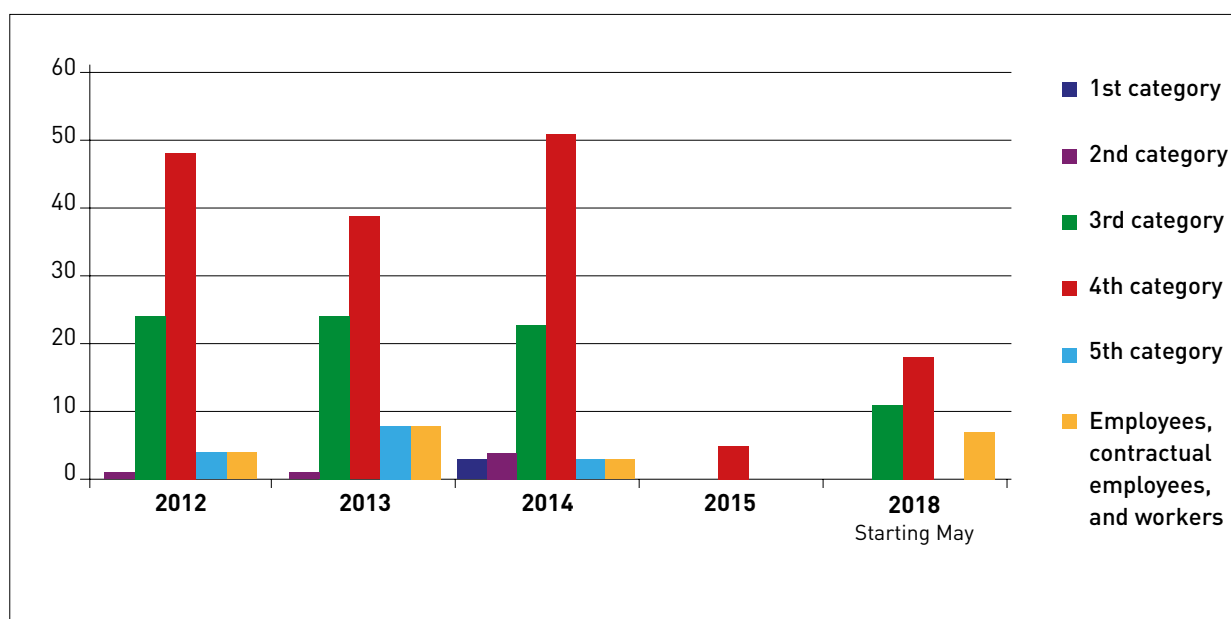
## Annex 4:

### Official Statistics from Central Inspection, the Higher Disciplinary Committee, and the Special Investigation Commission

#### 1) Statistics from Central Inspection on the penalties imposed on public officials, employees, contractual employees, and workers by category between 2012 and 2018

	2012	2013	2014	2015	2018 (starting May)	Total per category
<b>1st category</b>	0	0	3	0	0	3
<b>2nd category</b>	1	1	4	0	0	6
<b>3rd category</b>	24	24	23	0	11	82
<b>4th category</b>	48	39	51	5	18	161
<b>5th category</b>	4	8	3	0	0	15
<b>Employees, contractual employees, and workers</b>	4	8	3	0	7	22
<b>Total of the year</b>	81	80	87	5	36	289

#### 2) Statistics from the Higher Disciplinary Committee of the cases referred to it and decisions issued between 2013 and 2018



- **Number of convicted public officials**

The Higher Disciplinary Committee convicted 102 public officials and employees during this period.

- **Type of penalties:**

<b>1. Dismissal and removal:</b> 17 public officials and employees	<b>2. Other penalties:</b> Demotion (from 1 to 12 grades) Delaying “upgrading” Suspension Warning
	<b>1 official and employee</b>

- **Table showing the cases referred to the Higher Disciplinary Committee during the period 2013 - 2016 according to the referring party and grade of the referred public official**


Year	Number of Cases	Referring Party	Categories
2013	9	Central Inspection (4) Other sources or references (5)	4th Category and below
2014	11	Central Inspection (5) Other (6)	4th Category (7) 3rd Category (3) 1st Category (1)
2015	9	Central Inspection (0) Other (9)	4th Category and below (8) Notary Public (1)
2016	10	Central Inspection (0) Other (10)	4th Category and below (9) Notary Public (1)

- **Table showing the cases referred to the Higher Disciplinary Committee and Criminal Courts at the same time**

Public administration	Crime	Result
Public official (4th category) in Customs Administration	Embezzlement	To date, no final criminal judgment has been pronounced. Disciplinary decision of dismissal has been issued.
Notary Public in Ministry of Justice	Failure to pay due amounts; Numerous complaints referred to the Criminal Courts	Decision of permanent dismissal by the Higher Disciplinary Committee. No judgment has been pronounced.



Employee at the South Lebanon Water Establishment	Embezzlement	Decision of permanent dismissal by the Higher Disciplinary Committee. No final criminal judgment has been pronounced.
Teacher	Tampering with official examinations	Decision of demotion (by four grades) by the Higher Disciplinary Committee. No criminal judgment has been pronounced.
Teacher	Tampering with official examinations	Decision of demotion (by two grades) by the Higher Disciplinary Committee. No criminal judgment has been pronounced.
Assistant real estate registrar	Bribery and obstruction of citizens' transactions	Decision of dismissal by the Higher Disciplinary Committee. No criminal judgment has been pronounced.
Teacher	Malpractice	Decision of dismissal by the Higher Disciplinary Committee. No criminal judgment has been pronounced.
Municipal treasurer	Tampering with receipts	Decision of dismissal by the Higher Disciplinary Committee. No criminal judgment has been pronounced.
Customs comptroller	Bribery	Decision of demotion (by six grades) by the Higher Disciplinary Committee. No criminal judgment has been pronounced to date.
Customs comptroller	Bribery	Decision of demotion (by six grades) by the Higher Disciplinary Committee. No criminal judgment has been pronounced to date.
Customs comptroller	Bribery	Decision of demotion (by four grades) by the Higher Disciplinary Committee. No criminal judgment has been pronounced to date.
Employee in the Establishment of The Water of Beirut and Mount Lebanon	Bribery, terminating subscriptions, blackmailing	Decision of demotion (by two grades) by the Higher Disciplinary Committee. Criminal Judgment of non- prosecution for lack of evidence.
Public official (4th category) In Ministry of Interior	Stealing election funds	Decision of demotion (by 12 grades) by the Higher Disciplinary Committee. No criminal judgment has been pronounced.
Municipal official	Issuing false attestations	Demotion by two grades



33 customs officials (assistant comptrollers, clerks, and customs police officers)	Related to the Bassam Jaber tax evasion case worth billions of Lebanese pounds	Decision of demotion (by two grades) by the Higher Disciplinary Committee. No criminal judgment has been pronounced to date (the senior officials involved have not been referred to the Higher Disciplinary Committee despite its request).
Treasurer in the Forzol Municipality	Embezzlement	Declared innocent by the Criminal Court. Decision of non-punishment by the Higher Disciplinary Committee based on the criminal judgment.

- **Categories of public officials against whom disciplinary decisions were issued in 2013**

Decision no.	Category
1/2013	Municipal police officer – Rabieh Municipality
2/2013	Worker – Directorate General for Political Affairs and Refugees
3/2013	Employee – South Lebanon Water Establishment (4th category)
4/2013	Two forest guards – Jezzine Municipality, Ein Majdaline
5/2013	Municipal police officer – El-Mina Municipality
6/2013	Notary Public – Beirut
7/2013	Data entry officer – Ministry of Interior and Municipalities (4th category)
8/2013	Contractual doctor – Ministry of Health
9/2013	Clerk – Cadre of the Ministry of Finance (4th category)
10/2013	Administrative Secretary – Ein Saadeh Municipality

- **Categories of public officials against whom disciplinary decisions were issued in 2014**

Decision no.	Category
1/2014	Notary Public – Ghobeireh
2/2014	Accountant – North Governorate (4th category)
3/2014 and 4/2014	Tax collector – Bouarej Municipality (5th category)
5/2014	Director General of Cooperatives – Ministry of Agriculture (1st category)
6/2014	Teacher – Private Education Department, Ministry of Education and Higher Education Teacher (attaché) – Mount Lebanon Educational Area
7/2014	Municipal police officer – Municipality of Bhanine Al-Rihaniya and Mazraat Artousa





• **Categories of public officials against whom disciplinary decisions were issued in 2015**

Decision no.	Category
1/2015	Land surveyor – Cadastre Bureau, District of Metn (4th category)
2/2015	Teacher – Ministry of Education and Higher Education cadre (4th category)
3/2015	Worker – Saida Municipality
4/2015	Assistant comptrollers, clerks, and police officers – Customs Administration Cadre
5/2015	Treasurer – Forzol Municipality (4th category)
6/2015	Doctor – Ministry of Health Head of the Service of Public Health (2nd category)
7/2015	Treasurer – Makseh Municipality (4 <sup>th</sup> category)
8/2015	Treasurer – Takrit Municipality (4 <sup>th</sup> category)
9/2015	Workers – Beirut Water Establishment (4 <sup>th</sup> category)

• **Categories of public officials against whom disciplinary decisions were issued in 2016**

Decision no.	Category
1/2016	Worker – Beirut Water Establishment
2/2016	Comptroller – Customs Administration Cadre (3rd category)
3/2016	Worker and firefighters – Beirut Firefighting Unit
4/2016	Teacher – Ministry of Education and Higher Education Cadre
5/2016	Comptrollers – Customs Administration (3 <sup>rd</sup> category)
6/2016	Teachers – Ministry of Education and Higher Education
7/2016	Guards – Beirut Municipality
8/2016	Teachers – Ministry of Education and Higher Education
9/2016	Municipal guard
10/2016	Contractual employee, and Head of the Administrative Department in the Slaughterhouse Service – Beirut Municipality
11/2016	Clerk – Eineb Municipality
12/2016	Firefighter Corporal
13/2016	Assistant real estate registrar (3rd category)

• **Decisions issued by the Higher Disciplinary Committee in 2017**

Decision No.	Public Administration	Offenses	Position/t of the refer public offi
1/2017	Investment Development Authority of Lebanon	Falsification of private and official documents in order to obtain unlawful compensation	Employee

2/2017	Electricité du Liban	Financial and administrative violations on duty Meter alteration and tampering/interfering with the work of another department and in matters outside his competence Unlawfully receiving a payment in the form of a cheque to his name	Technical Specialist	Dismissal
3/2017	Electricité du Liban	Financial and administrative violations on duty (meter tampering)	Employee	Request for prosecution dismissed for lack of evidence
4/2017	Electricité du Liban	Financial and administrative violations on duty (issuing electricity meter change vouchers without performing due examination)	Technical Specialist	15-day salary deduction
5/2017	Chiyah Municipality	Breach of laws and regulations Engaging in business and paid jobs other than his job in civil service	Tax Collector	Demotion by 2 subgrades
6/2017	Broummana Municipality	Collecting municipal taxes from some taxpayers and issuing false receipts Tampering with receipts with the aim of embezzling public funds	Tax Collector	Suspension
7/2017	Beirut Municipality	Repeated misconduct	Corporal Firefighter	Demotion from Corporal Firefighter to Firefighter
8/2017	Rafik Hariri University Hospital	Selling expired cancer drugs Issuing fake drug invoices Not including all drugs in the accounting system Using and selling generic drugs as an alternative to brand drugs without the knowledge of the physicians, and replacing them with unlicensed medicines that are not registered at the Ministry of Public Health	Head of Section	Suspension
9/2017	Port Authority of Saida	Financial and administrative violations, and failure to repay an advance of two billion Lebanese pounds	Director of Service	Suspension
10/2017	Beirut Municipality –Engineering Service – Buildings Department	Exceeding his established mandate and exploiting his position, and acting as a mediator between two persons to complete the transaction of permit for building a fence and unlawfully obtaining money from the concerned persons	Engineer	Dismissal

• **Decisions issued by the Higher Disciplinary Committee in 2018**

<b>Decision No.</b>	<b>Public Administration</b>	<b>Offenses</b>	<b>Position/title of the referred public official</b>	<b>Summary of the decision</b>
1/2018	Hasbaya Governmental Hospital	Financial violations	Former Director	Case closed – employee resignation
2/2018	Mount Lebanon Governorate	Administrative violations	Head of Department	Dismissal
3/2018	Improvement Tax Department, Directorate of Revenues, Ministry of Finance	Administrative violations resulting from a problematic superior-subordinate relationship	- Head of Department - Tax Assessor	Disciplinary prosecution dismissed and case closed as “unfounded”
4/2018	Bekaa Water Establishment	Unjustified absence from work for 24 days	Employee	Promotion delayed for 12 months
5/2018	South Lebanon Water Establishment	Financial violations	Employee with the title of “Treasurer”	Suspension
6/2018	Ministry of Justice – Notary Public	Administrative violations resulting from the notary carrying out her duties in two different offices within her department	Notary Public	Suspension for 15 days
7/2018	Bekaa Water Establishment	Financial and administrative violations	Head of Service	Disciplinary prosecution dismissed and case closed – employee resignation
8/2018	Cadastre Bureau, General Directorate of Land Registry and Cadastre, Baabda	Administrative and financial violations and encroachment of public properties	- Land surveyor - Worker (with the title of “Technical assistant”)	- Unpaid suspension for six months - Suspension
9/2018	Beit El Din Municipality	Misconduct and administrative violations	Municipal police officer	Dismissal

10/2018	Ministry of Interior and Municipalities – Directorate General of Personal Status	Tampering and falsification of the Civil Status Register no. 18/Al Oyouun-Akkar	Contractual employee	Case closed for lack of employee status
11/2018	Railway and Public Transportation Authority	Misconduct, administrative violations, and repeated absence without legitimate excuse	Employee	Dismissal
12/2018	South Lebanon Water Establishment	Collecting water fees from taxpayers without depositing them in the Establishment's fund	Employee	Disciplinary prosecution discontinued and case closed by employee resignation
13/2018	North Lebanon Water Establishment	Misconduct, administrative violations, and tampering with lab results	Head of Section	Demotion
14/2018	Beirut Municipality	Misconduct, administrative violations, and unjustified absence from work	First Guard	Demotion by one subgrade
15/2018	Rafik Hariri University Hospital	Fraud and embezzlement of funds belonging to patients at the Rafik Hariri University Hospital	Accountant	Removal
16/2018	Ministry of Justice	Administrative violations	Notary public	Suspension for one month
17/2018	Chekka Municipality	Administrative and financial violations	Former treasurer	Unpaid suspension for six months
18/2018	Ministry of Justice	Embezzlement of funds, falsification of decisions, disbursement and withdrawal of funds from banks, and engagement in money laundering through purchasing of movable and immovable property and smuggling certain amounts	Bailiff	Removal
19/2018	Bekaa Water Establishment	Falsifying timesheets	Head of Service	No disciplinary penalty imposed for lack of violation
20/2018	Rafik Hariri University Hospital	Financial and administrative violations and tampering with cancer drugs	- Director General - Head of Service - Head of Department	Misconduct case closed, case deposited at the Public Prosecution at the Court of Cassation to take necessary action regarding the concerned persons dismissed from service

21/2018	South Lebanon Water Establishment	Tampering with subscribers' receipts and embezzling the Establishment's funds	Tax Collector	Suspension
22/2018	Ministry of Environment	Accused of taking a bribe to complete the transaction of "renewing a sand washing plant investment in Marjeyoun"	Contractual employee with the title of "Engineer"	Disciplinary penalty dismissed as "unfounded"
23/2018	Electricité du Liban	Financial and statutory violations, in particular his responsibility for the loss of bills from the arrears section in the Chiyah Department, and embezzlement of public funds	Employee with the title of "Technical expert"	Dismissal
24/2018	Governmental Hospital of Beirut Quarantina	Financial violations (falsification and embezzlement)	Employee with the title of "accountant"	Suspension
25/2018	Ministry of Finance – Directorate General of Customs	Neglect of duty	Clerk	Case closed for lack of violation as per the decision of the Council of State
26/2018	Ain Saade Municipality	Embezzlement of municipal funds	Tax Collector	Dismissal
27/2018	Kabiit Municipality	Administrative and financial violations	Treasurer	Suspension
28/2018	Rafik Hariri University Hospital	Non-compliance with management directives and repeated misconduct	Controller	Promotion delayed for three months as per the decision of the Central Inspection no. 204/2008, dated 21/10/2008, served to be sufficient
29/2018	Ministry of Justice	Non-compliance with professional ethics and manners in the relationship with the ministry where he works	Notary Public	Suspension for two months
30/2018	The Litani River Authority	Fraud and embezzlement of public funds and ensuring water supply to non-subscribers	Employee with the title of "First trainer"	Suspension

31/2018	Southern Mount Lebanon Water Establishment	Financial violations: ensuring water supply to some citizens and collecting money from them while neglecting his job and failing to report and control violations	Employee	Promotion delayed for three months for administrative violations. Case closed as "unfounded" regarding the remaining issues
32/2018	Ghobeiry Municipality	Repeated misconduct and violations to the service and regulations	Police officer	Promotion delayed for three months
33/2018	Beirut Municipality	Misconduct with direct manager and colleagues, unresponsiveness to administrative investigations, and repeated absence without a legitimate excuse	Head of Section	Promotion delayed for four months

### 3] Some of the cases referred to the Special Investigation Commission at the Central Bank until 31/12/2018:

Date	Position of the suspect(s)	Concerned sector	Corruption crime	Decision of the Special Investigation Commission
2008	A number of public officials and other persons	Body under a ministry	Embezzlement of public funds Abuse of confidence Cheque fraud	Lifting banking secrecy on accounts before the competent judicial authorities Freezing of bank accounts Notifying the concerned banks Case referred to the Public Prosecution at the Court of Cassation.
2009	Employees of an intermediary company dealing with a public utility	Public utility	Embezzlement of public funds Falsification of documents	Lifting banking secrecy on accounts before the competent judicial authorities Case referred to the Public Prosecution at the Court of Cassation

2010	A public official and his family members	Public utility	Abuse of authority Embezzlement of public funds	Lifting banking secrecy on accounts before the competent judicial authorities. Freezing of bank accounts Case referred to the Public Prosecution at the Court of Cassation
	A company agent	A private company owned by a public institution	Abuse of confidence Abuse of authority Embezzlement of public funds	Lifting banking secrecy on accounts before the competent judicial authorities Freezing of bank accounts Addressing a letter to the Minister of Finance to instruct the specialized cadastre departments to order the attachment of the properties and sections owned by the concerned persons Case referred to the Public Prosecution at the Court of Cassation
2012	A number of employees	Public institution	Embezzlement of public funds Abuse of office	Providing information to a security institution through the Public Prosecution at the Court of Cassation
	A company employee	Private company owned by a public institution	Abuse of confidence Embezzlement of public funds	Lifting banking secrecy on accounts before the competent judicial authorities Freezing of bank accounts Case referred to the Public Prosecution at the Court of Cassation
2013	Head of a body (under a ministry) and his family members	Body under a ministry	Influence peddling Embezzlement of public funds	Lifting banking secrecy on accounts before the competent judicial authorities. Freezing of bank accounts Requesting a foreign financial intelligence unit to freeze the accounts of one of the accused persons at one of the foreign country's banks until the receipt of a letter from Lebanon's judiciary Case referred to the Public Prosecution at the Court of Cassation
	Car dealer with the help of his wife	Directorate at a ministry	Embezzlement of public funds Falsification of documents	Lifting banking secrecy on accounts before the competent judicial authorities Freezing of bank accounts Case referred to the Public Prosecution at the Court of Cassation
2014	Officer	Military institution	Abuse of authority Influence peddling	Lifting banking secrecy on accounts before the competent judicial authorities Freezing of bank accounts Case referred to the Public Prosecution at the Court of Cassation

2014	Owner of a fuel distribution company and other persons	Military institution and a hospital	Embezzlement of public funds Falsification of documents	Lifting banking secrecy on accounts before the competent judicial authorities Freezing of bank accounts Case referred to the Public Prosecution at the Court of Cassation
2015	Owners of an exchange company	Body under the Presidency of the Council of Ministers	Embezzlement of public funds	Providing information to a security institution through the Public Prosecution at the Court of Cassation
2016	Officers and others	Military institution	Embezzlement of public funds Trading in influence	Lifting banking secrecy on accounts before the competent judicial authorities Freezing of bank accounts Case referred to the Public Prosecution at the Court of Cassation
	A number of employees	Public administration	Embezzlement of public funds	Lifting banking secrecy on accounts before the competent judicial authorities Freezing of bank accounts Case referred to the Public Prosecution at the Court of Cassation
2017	Retired officer, military institution adviser and others	Military institution	Abuse of authority Influence peddling Accepting bribes	Lifting banking secrecy on accounts before the competent judicial authorities Freezing of bank accounts Case referred to the Public Prosecution at the Court of Cassation Re-establishing banking secrecy on accounts and lifting freezes as per the letter addressed by the Public Prosecution at the Court of Cassation
2018	Public officer and others	Public utility	Embezzlement of public funds	Lifting banking secrecy on accounts before the competent judicial authorities Case referred to the Public Prosecution at the Court of Cassation




## Annex 5:

### The three phases of consultations between 2016 and 2019 and the adoption and Implementation phase

#### Phase 1 (March 2016-January 2017)

1	29/03/2016	<b>Mr. Abdel Hafiz Mansour</b> , Secretary of the Special Investigation Commission at the Central Bank
2	05/04/2016	<b>Dr. Fouad Zmokhol</b> , President of Association of Lebanese Business People in the World (RDCL World)
3	12/04/2016	<b>Mr. Antoine Wakim</b> , Board Member at the National Social Security Fund and Dr. Fouad Zmokhol
4	14/04/2016	<b>Mr. Arkan El-Seblani</b> , Chief Technical Advisor and Regional Project Manager, Anti-Corruption and Integrity in Arab Countries, UNDP
5	14/04/2016	<b>MP Ghassan Moukheiber</b> , Chairman of the “Parliamentarians Against Corruption” organization
6	19/04/2016	<b>Mr. Abdo Medlej</b> , President of “Sakker El Dekenne” NGO
7	19/04/2016	<b>Mr. Yehia Hakim</b> , Secretary of the board, Lebanese Transparency Association
8	26/04/2016	<b>Mr. Mohamad Fneich</b> , Minister of State for Administrative Reform in the presence of his consultants Judge Abdallah Ahmad and Attorney Ali Berro
9	27/04/2016	<b>MP Robert Ghanem</b> , Chairman of the Administration and Justice Parliamentary committee
10	04/05/2016	<b>MP Dr. Atef Majdalani</b> , Chairman of the Public Health Parliamentary committee
11	11/05/2016	<b>MP Ibrahim Kanaan</b> , Chairman of Finance and Budget Parliamentary committee
12	16/05/2016	<b>MP Mohamed Kabbani</b> , Chairman of the Public Works, Transportation, Energy and Water Committee Parliamentary committee
13	01/06/2016	<b>Mr. Mohamed Choucair</b> , Chairman of the Federation of the Chambers of Commerce, Industry and Agriculture, heads of economic bodies, members and directors of the Chambers and Eng. Maroun Helou, President of the Lebanese Contractors Syndicate
14	07/06/2016	<b>Judge Jean Fahd</b> , President of the Higher Judicial Council, and members: Presidents Marwan Karkabi, Akram Baasiri, Habib Al Hadthi, Afif Al Hakim, and Mohamad Mortada
15	10/06/2016	<b>Judge Chukri Sader</b> , President of the Council of State
16	13/06/2016	<b>Mr. Nabil De Freij</b> , Minister of State for Administrative Reform, Vice Chairman of the Ministerial Anti-Corruption Committee, Chairman of the Technical Committee



<b>17</b>	11/07/2016	<b>Mr. Arkan El-Seblani</b> , Chief Technical Advisor and Regional Project Manager, Anti-Corruption and Integrity in Arab Countries, UNDP
<b>18</b>	25/07/2016	
<b>19</b>	10/08/2016	
<b>20</b>	15/09/2016	
<b>21</b>	18/10/2016	
<b>22</b>	23/01/2016	<b>Dr. Inaya Ezzeddine</b> , Minister of State for Administrative Reform

## Phase 2 (January 2018-April 2018)

<b>1</b>	29/01/2018	First meeting with the representatives of the Ministries of Health, Environment, Education, Energy and Water, Finance and Tenders Administration
<b>2</b>	30/01/2018	<b>Dr. Walid Al Chaar</b> , Head of the Tax Legislation Department, Ministry of Finance
<b>3</b>	12/02/2018	Second meeting with the representatives of the Ministries of Health, Environment, Education, Energy and Water, Finance and Tenders Administration
<b>4</b>	15/02/2018	<b>Mrs. Lina Yamout</b> , Chief of Service of Environmental Guidance, Ministry of Environment
<b>5</b>	19-20/02/2018	High level workshop on “Strengthening the role of the judicial system in the framework of the National Anti-Corruption Strategy (NACS)”
<b>6</b>	22/02/2018	<b>Mr. Badri Daher</b> , Director General of the Customs Administration
<b>7</b>	05/03/2018	A preliminary meeting with the Economic and Social Council (ECOSOC)
<b>8</b>	06/03/2018	Mr. Youssef Saad, Senior Procurement Officer, Ministry of State for Administrative Reform
<b>9</b>	06/03/2018	<b>Mr. Najib Korban</b> , Senior ICT Project Manager, Ministry of State for Administrative Reform
<b>10</b>	08/03/2018	<b>Mr. Jean Allieh</b> , Director General of the Tenders Administration
<b>11</b>	08/03/2018	<b>Mr. Georges Maarawi</b> , Director General of the Directorate General of Land Register and Cadastre
<b>12</b>	08/03/2018	<b>Mr. Badri Daher</b> , Director General of the Customs Administration
<b>13</b>	09/03/2018	<b>Dr. Walid Al Chaar</b> , Head of the Tax Legislation Department, Ministry of Finance
<b>14</b>	09/03/2018	<b>Dr. Najat Gerges Jadaoun</b> , Ministry of Education and Higher Education



15	14/03/2018	<b>Extensive meeting with the representatives of:</b> <ul style="list-style-type: none"> <li>• Lebanese Transparency Association</li> <li>• Sakker El Dekkene</li> <li>• Koulouna Irada</li> <li>• Lebanese League of Women in Business</li> <li>• Lebanese Oil and Gas Initiative (LOGI)</li> <li>• Finance Expert Association in Lebanon</li> <li>• Lebanese Center for Public Studies</li> <li>• Legal Agenda (Al Mufakkira Al Qanuniyya)</li> <li>• Economic and Social Council (ECOSOC)</li> <li>• Association of Certified Fraud Examiners Lebanon</li> <li>• UN Global Compact Local Network- Lebanon</li> <li>• American University of Beirut</li> <li>• Lebanese University</li> <li>• Antonine University</li> <li>• Notre Dame University</li> <li>• Saint Joseph University</li> </ul>
16	15/03/2018	<b>Mr. Badri Daher</b> , Director General of the Customs Administration
17	16/03/2018	<b>Mr. Paul Welton</b> , Lead Governance Specialist, World Bank's Governance Global Practice
18	21/03/2018	<b>Mr. Nizar Saghieh</b> , Legal Agenda
19	21/03/2018	<b>Ms. Lina Abou Mrad</b> , National E-health Program Director, Ministry of Health
20	21/03/2018	<b>Ms. Aurore Feghali</b> , Director General of Oil, Ministry of Energy and Water
21	22/03/2018	<b>Ms. Lina Yamout</b> , Chief of Service of Environmental Guidance, Ministry of Environment
22	23/03/2018	<b>Ms. Lina Yamout</b> , Chief of Service of Environmental Guidance, Ministry of Environment
23	26/03/2018	<b>Ms. Rima Koteiche</b> , Financial Management Specialist, World Bank
24	26/03/2018	<b>Mr. Talal Salman</b> , Project Manager, Technical Assistance for Fiscal Management and Reform, UNDP
25	27/03/2018	<b>Mr. Samer Hankir</b> , Human Resources Management Support Project, Ministry of State for Administrative Reform
26	28/03/2018	<b>Brigadier General Assaad Al-Tufaili</b> , Chief of the Higher Council of Customs, members of the Council and representative of its supporting task force
27	10/04/2018	<b>Mr. Ali Berro</b> , Project to support the Right of Access to Information, Ministry of State for Administrative Reform
28	18/04/2018	Employees at the Ministry of State for Administrative Reform
29	18/04/2018	<b>Judge Samir Hammoud</b> , State Prosecutor
30	18/04/2018	<b>Dr. Marwan Qronfol</b> , Director General's Office, Ministry of Telecommunications
31	20/04/2018	<b>Ms. Diana Kaissi</b> , Lebanese Oil and Gas Initiative (LOGI)
32	20/04/2018	<b>Mr. Rony Richa</b> , UN Global Compact Local Network-Lebanon

### Phase 3 (April 2019-September 2019)

The Ministry of State for Administrative Reform's task force, represented by Mrs. Natacha Sarkis and Mr. Ali Berro, and supported by the UNDP, represented by Mr. Arkan El-Seblani, held the following meetings with the representatives of the ministries to discuss their observations on the draft National Anti-Corruption Strategy 2020-2025:

1	03/05/2019	<b>Mrs. Lamia Moubayed, Rana Rizkallah and Dr. Jihane El-Khoury</b> , Ministry of Finance
2	03/05/2019	<b>Judge Rana Akoum</b> , Ministry of State for Presidential Affairs
3	13/05/2019	<b>Dr. Walid Al-Naqeeb</b> and <b>Lieutenant Colonel Wajdi Kulaib</b> , Ministry of Interior and Municipalities
4	20/05/2019	<b>Judge Ayman Ahmed, Judge Rana Akoum, Judge Jad Maalouf</b> , Ministry of Justice
5	24/05/2019	<b>Dr. Abdel Halim Fadlallah, Dr. Muhammad Tay and Dr. Hussein Al-Ezzi</b> , Ministry of State for Parliamentary Affairs
6	27/05/2019	<b>Mr. Bassam El-Jouni</b> , Ministry of Industry
7	02/07/2019	<b>Mr. Razi Al-Hajj</b> , Ministry of Economy and Trade
8	13/09/2019	<p><b>Joint meeting of the representatives of the ministries:</b></p> <ul style="list-style-type: none"> <li>• <b>Rana Rizkallah, Dr. Jihane El-Doueihy and Dr. Jihane El-Khoury</b>, Ministry of Finance</li> <li>• <b>Lieutenant Colonel Wajdi Kulaib</b>, Ministry of Interior and Municipalities</li> <li>• <b>Judge Ayman Ahmed and Judge Jad Maalouf</b>, Ministry of Justice</li> <li>• <b>Dr. Hussein Al-Ezzi</b>, Ministry of State for Parliamentary Affairs</li> <li>• <b>Mr. Bassam El-Jouni</b>, Ministry of Industry</li> <li>• <b>Mr. Razi Al-Hajj</b>, Ministry of Economy and Trade</li> <li>• <b>Mrs. Natacha Sarkis</b>, Ministry of State for Administrative Reform</li> <li>• <b>Mr. Ali Berro</b>, Ministry of State for Administrative Reform</li> </ul> <p>In the presence of the <b>UNDP representatives:</b></p> <ul style="list-style-type: none"> <li>• <b>Mr. Arkan El-Seblani</b></li> <li>• <b>Mrs. Diana Vartanian</b></li> </ul>
9	20/09/2019	<b>Mrs. Lamia Moubayed and Rana Rizkallah</b> , Ministry of Finance
10	20 meetings between June and September 2019	<b>Between the Ministry of State for Administrative Reform and the UNDP task forces</b>



## Adoption and roll-out phase (February 2020-May 2020)

The Minister of State for Administrative Development Affairs, Damianos Kattar, and the Ministry's task force initiated a series of technical meetings and workshops with the UNDP experts, MP Ghassan Moukheiber, and Mr. Arkan El-Seblani, in order to update the National Anti-Corruption Strategy 2020-2025 based on the latest developments and prepare it to be submitted to the Council of Ministers for adoption:

1	During February 2020	<p>Technical workshops between the Ministry of State for Administrative Reform's task force headed by the Minister of State for Administrative Reform and UNDP experts</p>
2	02/03/2020	<p>Meeting of the Technical Committee supporting the Ministerial Anti-Corruption Committee, chaired by the Minister of State for Administrative Reform, to brief it on the developments regarding the adoption of the National Anti-Corruption Strategy and to adopt the national plan on the implementation of Right of Access to Information Law.</p> <p><b>Participants from the Committee:</b></p> <p><b>Chairman of the Committee:</b></p> <ul style="list-style-type: none"> <li>• Damianos Kattar (Minister of State for Administrative Reform)</li> </ul> <p><b>Members of the Committee (according to the order of the ministries and public administrations as per the Decision on the Establishment of the Committee):</b></p> <ul style="list-style-type: none"> <li>• Retired Judge Said Mirza (on behalf of the Presidency of the Council of Ministers)</li> <li>• Judge Rana Akoum (on behalf of the Ministry of Justice)</li> <li>• Mr. Louay Chehade (on behalf of the Ministry of Finance)</li> <li>• Lieutenant Colonel Dr. Wajdi Kulaib (on behalf of the Ministry of Interior and Municipalities)</li> <li>• Judge Helene Iskandar (on behalf of the Higher Judicial Council)</li> <li>• Judge Emilie Kallas (on behalf of the Public Prosecution at the Court of Cassation)</li> <li>• Judge Bassam Wehbe (on behalf of the Court of Accounts)</li> <li>• Judge Georges Attieh (on behalf of the Central Inspection)</li> <li>• Antoine Gebran (on behalf of the Civil Service Board)</li> <li>• Mr. Ali Merhi (on behalf of the Higher Disciplinary Board)</li> <li>• Mr. Boutros Kanaan (on behalf of the Central Bank)</li> <li>• Judges Carl Irani and Lama Yaghi (on behalf of the Council of State)</li> <li>• Mrs. Natacha Sarkis (Secretary of the Committee/on behalf of the Ministry of State for Administrative Reform)</li> </ul> <p><b>Participants from outside the Committee:</b></p> <ul style="list-style-type: none"> <li>• Attorney and former MP Ghassan Moukheiber (Expert appointed by UNDP and OECD)</li> <li>• Mr. Ali Berro (on behalf of the Ministry of State for Administrative Reform)</li> </ul>
3	During March and April 2020	<p>Completion of the technical workshops between the Ministry of State for Administrative Reform's task force headed by the Minister of State for Administrative Reform and the UNDP experts</p>





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