Republic of Lebanon

Anti Corruption
National Strategy

Final Evaluation Report

The National Anti-Corruption Strategy

2020 - 2025

The Independent Evaluation of Lebanon's National Anti-Corruption Strategy 2020–2025 was prepared by an independent expert contracted by UNDP, with funding from the European Union and the Government of the Kingdom of Denmark, ensuring the independence and objectivity of the assessment in line with internationally recognized standards and practices, and in accordance with a recommendation by the Technical Anti-Corruption Committee supporting the Ministerial Anti-Corruption Committee, chaired by the Minister of State for Administrative Reform, Dr. Fadi Makki.

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Foreword

In times of crisis, integrity becomes a prerequisite for state recovery and for restoring citizens' trust in public institutions. From this perspective, combating corruption emerges as a steadfast national choice and an essential reform pathway, indispensable for promoting transparency and accountability and for entrenching good governance.

This independent evaluation report of the National Anti-Corruption Strategy 2020–2025 comes at a pivotal national moment, in a context that calls for an objective reflection on a reform trajectory that, over recent years, has constituted one of the main pillars for advancing integrity, transparency, and accountability in Lebanon. The report represents a milestone to review achievements, document the challenges encountered during implementation, and draw lessons learned that can contribute to the development of public policies and enhance the effectiveness of national efforts aimed at preventing and combating corruption.

The strategy was designed and implemented under exceptionally difficult circumstances, marked by political fragility, financial collapse, a global pandemic, economic contraction, and rising security tensions. These conditions cast a heavy shadow over the capacities of the state and its institutions, as well as over the broader reform environment. Nevertheless, the strategy provided a unifying national framework that sustained momentum in the fight against corruption and reinforced its status as a non-negotiable national priority, regardless of mounting challenges and pressures.

The importance of this report lies not only in documenting the implementation of the strategy over the 2020–2025 period, but also in serving as a tool for institutional accountability, learning, and continuous improvement. It offers a realistic assessment of progress based on internationally recognized standards, highlights strengths and achievements, and sheds light on gaps and constraints that have hindered the attainment of certain expected results, particularly regarding results-based monitoring, the availability of baselines and quantitative indicators, and the sustainability of resources and institutional capacities.

A defining strength of this report lies in its independent nature. Rather than constituting a routine evaluative exercise, it was conducted by independent experts in accordance with international standards and best practices, thereby enhancing the objectivity, credibility, and reliability of its findings, while reinforcing a pioneering approach to independent evaluation and evidence-based institutional learning.

The evaluation constitutes an integral component of good governance, fostering a culture of evidence-based institutional learning and providing data to improve planning, inform decision-making, set priorities, and enhance impact and sustainability in future phases. The report also underscores that behavioral challenges are a critical determinant of implementation effectiveness, calling for the adoption of behavioral science approaches and their systematic integration into the design of policies and programs. These insights, alongside other lessons learned, will be considered in the development of the new phase of the National Ant-Corruption Strategy 2026-2030 to strengthen interventions and improve the quality of outcomes achieved.

The report demonstrates that the National Anti-Corruption Strategy 2020–2025 was not merely a technical document, but the product of a long-term institutional and participatory process that contributed to building national consensus around anti-corruption priorities and responded fundamentally to public demands for greater transparency, integrity, and accountability. The evaluation further shows that the strategy was grounded in a robust methodology aligned with international standards and best practices, and that it provided an advanced framework for strategic planning in the field of anti-corruption.

At the same time, the report notes that the implementation of the strategy has led to promising progress in several areas, particularly in the development of a specialized legislative framework for combating corruption; enhancing transparency through access to information and digital publication in key sectors; launching fundamental reforms in public procurement; establishing the National Anti-Corruption Commission; and strengthening the roles of several oversight bodies. There have also been emerging indications of increased attention to more preventive approaches, including sectoral corruption risk management and the expansion of policy dialogue and civic advocacy on issues of integrity and accountability.

However, the report also clearly indicates that progress has been uneven, and that a number of reforms have yet to translate into tangible improvements in citizens' trust or into a measurable reduction in corruption, as reflected in international indicators. Limited human and financial resources, weak and irregular institutional coordination, incomplete implementation frameworks, and the absence of an integrated national monitoring and evaluation system have all constrained implementation effectiveness and the ability to measure results in a consistent and accurate manner.

In this context, it is important to commend the efforts of the Ministers who led the Ministry of State for Administrative Reform over the years, as well as the contributions of various national partners involved in developing and supporting the implementation of the strategy. We also extend our sincere thanks and appreciation to all partner government entities and stakeholders in public administrations, institutions, and oversight and judicial bodies for their commitment and cooperation in supporting the strategy's implementation and accompanying its various processes, despite the challenges and complexities they faced. We further express our deep gratitude to the United Nations Development Programme for its technical support and specialized assistance, and to the European Union and the Government of the Kingdom of Denmark for their generous funding of this reform process, which has contributed to sustaining and advancing it.

As we reaffirm the current government's commitment to continuing national efforts to combat and prevent corruption, we believe that the next phase requires building on achieved progress while addressing the shortcomings identified by the evaluation, particularly by strengthening coordination among relevant entities, enhancing follow-up and monitoring mechanisms, addressing gaps in resources and capacities, and institutionalizing a more comprehensive and sustainable preventive approach. In this regard, the 'Reinventing Government 2030' programme, launched in 2025, represents a key reform lever for modernizing public administration and enhancing its efficiency and transparency through accelerated digital transformation, the development of e-government services, and the strengthening of data and systems integration, thereby reducing corruption incidence and reinforcing the integrity and accountability framework. We emphasize that combating corruption is not a temporary or sectoral commitment, but a strategic national choice and a fundamental pillar for building a just, effective, and capable state.

Accordingly, we hope that this independent evaluation report will serve as a practical reference to support national dialogue on future priorities and contribute to guiding efforts toward more effective, integrated, and sustainable policies and interventions, serving the public interest and strengthening Lebanon's capacity to advance along the path of consolidating integrity, transparency, and accountability.

Dr. Fadi Makki
Minister of State for Administrative Reform

Executive Summary

This final independent evaluation aimed to **assess the results achieved through the implementation of Lebanon's National Anti-Corruption Strategy (NACS) 2020–2025**, using six internationally recognized criteria: relevance, coherence, effectiveness, efficiency, impact, and sustainability. The evaluation examined the extent to which the Strategy responded to national priorities and international commitments, how well the implementation of its components was coordinated across the public administration and stakeholders, and whether its actions produced measurable results towards the three objectives, enhancing transparency, activating accountability, and ending impunity, along with the related expected outcomes. It also considered the adequacy of resources mobilized, the operational capacity of implementing bodies, and the likelihood that reforms initiated under NACS will be sustained beyond the current cycle. The findings draw on a combination of document review, stakeholder consultations, field visits, and survey data, providing a well-rounded view of both progress achieved and ongoing challenges – despite certain limitations outlined in the report. In particular, staff turnover and weak institutional memory in some entities affected the continuity and accessibility of relevant information, which in turn limited the depth of analysis in certain areas. The recommendations were formulated with a forward-looking perspective, aimed at informing the development of future strategies.

Key findings

The NACS 2020–2025 is the culmination of a long-term institutional and participatory process that began in 2011. Over nearly a decade, this process fostered sustained consensus among key institutional and non-governmental stakeholders and laid the foundation for appropriate governance mechanisms to support a national anti-corruption agenda. The Strategy emerged not only as a technical framework but also as a reflection of growing public demand for integrity and accountability. Following the widespread social uprisings of 2019 and the general call to address systemic corruption, the NACS gained renewed momentum and was formally adopted in 2020. Its adoption marked a pivotal moment, signalling both national commitment and a structured roadmap for mobilizing international support toward reform.

The Strategy document underpinning the NACS 2020–2025 is built on a solid methodological foundation, aligned with international standards and best practices in anti-corruption policy design. It offers a clear and contextually grounded definition of corruption, accompanied by a diagnostic analysis of its root causes and systemic drivers. These elements are coherently linked to expected outcomes and outputs through a well-articulated theory of change. The Strategy adopts a comprehensive approach, integrating a clear implementation and follow-up mechanism and a structured implementation plan. It also included an indicative monitoring and evaluation (M&E) framework aligned with strategic objectives; however, this framework required further development to incorporate baselines and targets. This level of methodological rigor positions the NACS as a commendable regional model for strategic anti-corruption planning.

The implementation of the NACS 2020–2025 unfolded within an exceptionally complex and volatile context, marked by acute political instability, financial collapse, economic contraction, and regional insecurity. Understanding this environment is essential when assessing results, not only to calibrate expectations but also to recognize the constraints faced by public institutions and reform actors. In light of these conditions, the achievements registered under the Strategy, however partial or uneven, reflect a commendable effort to uphold reform momentum and institutional resilience. The ability of key stakeholders to advance transparency, accountability, and anti-corruption measures amid such adversity deserves recognition and continued support.

The follow-up mechanism on the implementation of the NACS was robust in design – intended to ensure ownership, coordination, and strategic oversight – and largely succeeded in steering the Strategy's implementation. However, some structures deviated from their original design, and others were not fully operationalized, including mechanisms for regular coordination with non-governmental actors and donors. Despite these shortcomings, the follow-up mechanism remained relevant and functional within the given context, playing an important role in ensuring institutional continuity in anti-corruption efforts.

A notable limitation in the implementation of the NACS 2020–2025 lies in the absence of a comprehensive monitoring framework for the implementation framework, including baseline data and time-bound targets linked to selected indicators. While the Strategy introduced a unique process for reporting achievements, it did not establish a fully operational results-based monitoring system with a dedicated monitoring and evaluation framework to track progress in implementation. Qualitative reporting through annual reports was nonetheless conducted and provided a valuable foundation for analysis. Civil society contributions and international assessments complemented this picture, yet access to reliable data and consistent measurement remains a challenge.

The implementation of the NACS 2020–2025 reflected a concerted effort to align with its core strategic objectives – namely, enhancing transparency, activating accountability, and ending impunity. Promising progress was achieved in advancing transparency, notably through digital publication of information on public procurement, the release of key administrative information, and the operationalization of practical systems and procedures to ensure access to information in line with the Access to Information and Public Procurement Laws adopted during the implementation of the NACS. These initiatives contributed to a more open governance environment and laid the foundation for gradual institutional culture change. The National Anti-Corruption Commission was established and several oversight bodies – such as the Public Procurement Authority, the Court of Accounts, and the Central Inspection – strengthened their capacity to detect corruption during the implementation of the NACS. However, their ability to pursue these efforts remains significantly constrained by the absence of robust institutional mechanisms and chronic resource shortages. Oversight institutions continue to face deficits in operational autonomy, financial allocations, and specialized human capital, which hinder their ability to conduct investigations, monitor compliance, and ensure enforcement. Furthermore, the lack of institutionalized and regular coordination and collaboration among oversight bodies contributes to weakening the overall accountability framework. Without effective coordination and collaboration, adequate staffing, and digital infrastructure, accountability efforts risk remaining symbolic rather than systemic. Strengthening these institutions with clear and coherent mandates, adequate resources, and inter-agency coordination frameworks is essential to transform oversight into credible deterrence and restore public trust in Lebanon's accountability architecture. As for impunity, a cautiously positive shift was observed in the final two years of the Strategy, marked by increased public scrutiny, demand for justice, and an increased number of prosecutions for corruption crimes, especially for illicit enrichment. Nevertheless, conviction rates for corruption-related offenses remained low, and citizen confidence in the judiciary and public administration continued to erode.

The evaluation found reasonably consistent indications that several expected outcomes of the NACS 2020–2025 have been advanced in a meaningful way. **First, Lebanon's specialized anti-corruption legislative framework has undergone significant transformation**, marked by the concrete amendments and adoption of landmark laws on asset and interest declarations and the punishment of illicit enrichment, whistleblower protection, asset recovery, right of access to information and the establishment of the National Anti-Corruption Commission (NACC). While implementation has faced delays, important efforts have been made to activate and operationalize these laws. In addition, other key pieces of legislation have been adopted in the area of anti-corruption, while they may not be directly attributed to the NACS 2020-2025, they were considered within the broader process and structured dialogue initiated around the Strategy. Notably, this includes Law No. 306 (2022), which amended the 1956 Banking Secrecy Law, and Law No. 84 (2018) on Enhancing Transparency in the Petroleum Sector. **Second, the public procurement system underwent a substantial reform,** with the adoption of a new law and the establishment of the Public Procurement Authority, introducing mechanisms to enhance transparency and integrity in public spending. **Third, oversight bodies have begun to strengthen their role in corruption detection**, supported by the introduction of modern auditing and control methodologies. **Fourth, a growing adherence to sector-specific corruption risk management approaches** has emerged, signalling a shift toward preventive approaches within the public administration. **Fifth, the NACS has created a structured space for policy dialogue and civic advocacy, enabling non-governmental actors to engage more actively in promoting integrity and social accountability.** However, **the evaluation found limited evidence of progress in strengthening integrity and transparency policies and measures in the judiciary and strengthening its capacities to effectively combat corruption**. Key reforms related to judicial independence – across the judicial, administrative, and financial branches – remain pending, and measures to improve transparency and efficiency within the court system are still underdeveloped. **Similarly, introducing tangible integrity policies and measures in the civil service remains limited,** with major reforms and concrete mechanisms to enhance transparency and performance yet to be institutionalized.

The evaluation also highlighted the need to institutionalize **regular and coordinated mechanisms for consultation and collaboration with non-governmental actors – including civil society, media, academia, and the private sector as part of the existing follow-up mechanisms of the NACS and as initially foreseen in its mandate -** and **enhancing regular donor coordination** to ensure that financial and technical assistance effectively supports the holistic and balanced implementation of the Strategy. Strengthened coordination mechanisms will help foster synergies, avoid duplication, and promote complementarities across donor interventions. Equally important is the need to invest in **specialized capacity-building on integrity and anti-corruption** through a more systematic engagement of existing training centers such as the National School of Administration, Institute of Finance Basel Fuleihan and the Judicial Studies Institute in cooperation with the National Anti-Corruption Commission. Their limited integration into NACS programming has resulted in missed opportunities to develop integrity and anti-corruption structured learning. A critical finding relates to the urgent need to **address budgetary and staffing gaps** to ensure that institutions are adequately resourced to implement the anti-corruption reform agenda. These institutions must be strategically anchored within a broader national reform planning framework that aligns NACS priorities with development and sectoral objectives under a unified government plan. This requires coherent budget allocations and the establishment of a permanent management and monitoring system to ensure sustained implementation and evaluation. Finally, the evaluation highlighted the imperative of developing a national measurement system for corruption, enabling evidence-based monitoring and adaptive policymaking. It also emphasized the importance of **leveraging policy space** not only to enact legal reforms, but to also advance preventive anti-corruption policies – moving beyond a strictly legalistic approach toward a more systemic and preventive anti-corruption model.

Despite these achievements, international indicators continue to reflect persistent public mistrust and limited progress in corruption perception in Lebanon, **suggesting that formal reforms have yet to translate into widespread public confidence**. Nevertheless, there are emerging signs of institutional culture change, particularly in relation to transparency and procedural reform. These include early efforts to embed risk identification and management practices within public administration, in particular at the sectoral level – indicating a gradual shift toward preventive measures and institutional safeguards against corruption.

Recommendations

Recommendations on the NACS implementation mechanisms

Strategic alignment and planning

- **Strengthen integration with economic and development priorities, national and sectoral planning in order** to reinforce coherence and long-term impact. It is recommended to strengthen the integration of the updated anti-corruption strategy with future national reform frameworks, future public administration reform agenda and sectoral planning frameworks. Developing a national development or vision document remains essential to anchor strategic frameworks – such as the NACS – within broader operational plans and budgetary processes. This would enable more effective prioritization, resource allocation, and institutional commitment across sectors. Targeted training and support should be provided to public institutions to build strategic planning capacities, ensuring they acquire the necessary competencies to contribute meaningfully to both the development and execution of the strategy.

Risk management and adaptive implementation

- **Embed structured risk analysis and mitigation mechanisms** within the follow-up mechanism and implementation plan of an updated Strategy. This will enhance its relevance and responsiveness, enabling institutions to proactively navigate uncertainties and adapt to Lebanon's volatile context.

Follow-up mechanism of the NACS

- **Recentre the follow-up mechanism of the NACS around the strategic outcomes and annual work planning** to enhance coordination among responsible entities working toward common results. This outcome-based approach would improve information exchange, collaboration, and result measurement. This would also encourage stakeholders to engage not only in the implementation of their respective initiatives but also in the broader strategic framework, fostering a more integrated and coherent approach to anti-corruption reform. In this context, a Monitoring and Evaluation Team should be formally established and empowered to play a cross-cutting role in tracking progress across outcomes, facilitating data collection, and supporting evidence-based decision-making. Annual work plans should be developed in line with the NACS objectives and serve as operational tools to translate strategic priorities into actionable activities, timelines, and adequate resource allocations.
- **Strengthen institutional continuity and knowledge transfer mechanisms** in order to ensure strategic coherence and preserve institutional memory. As such, the Technical Committee could develop Terms of Reference of committee members to clarify their roles and responsibilities and establish a formalized induction and handover protocol for newly appointed members. This should include: i) a concise briefing package summarizing previous meetings, key decisions, implementation challenges, and unresolved issues; ii) access to relevant documentation, including meeting minutes, progress reports, and strategic updates; iii) a designated focal point or secretariat tasked with maintaining continuity and facilitating onboarding. Additionally, the Com-

mittee should consider activating a fixed meeting schedule aligned with its original mandate (e.g., quarterly sessions), to reinforce regular oversight and enable timely decision-making. Stabilizing representation and improving knowledge transfer will enhance the Committee's responsiveness and its ability to guide the strategy's implementation effectively.

- **Institutionalize regular and structured collaboration with non-governmental stakeholders – including civil society organizations, private sector actors, academia, and media – within the governance framework of the NACS.** This could be achieved through formal structured dialogue convened on a regular basis, with clear agendas and a documented process, as originally mandated by the decision establishing the Ministerial and Technical Committees**.** Future iterations of the Strategy should establish clear modalities for stakeholder engagement, to inform strategic direction and policy coherence, assigning roles in M&E processes, such as contributing to progress reviews, risk assessments, and validation of findings.

Monitoring and Evaluation (M&E) framework

- **Develop a comprehensive monitoring and evaluation (M&E) framework for the NACS** that includes periodic evaluation reports and clearly defined Specific, Measurable, Achievable, Relevant, and Time-bound (SMART) indicators, with established baseline and targets to be achieved, to enable early identification of implementation challenges, support timely corrective actions, and reinforce accountability mechanisms. Given the limited specialized capacities within public institutions, collaboration with civil society organizations and academic institutions should be leveraged to support data collection, analysis, and evidence-based reporting. This approach will contribute to more informed decision-making and foster a culture of transparency and continuous improvement.

Implementation gaps

Address in any future iteration of an anti-corruption strategy the implementation gaps of the NACS 2020-2025 pertaining to:

1. Strengthening implementation mechanisms for specialized anti-corruption legislation and completing the legislative framework

To consolidate Lebanon's anti-corruption framework, it is essential to support and update the implementation mechanisms of specialized legislation – such as laws on asset disclosure, access to information, whistleblower protection, and public procurement – while simultaneously pursuing the completion of the broader legislative framework and supporting the National Anti-Corruption Commission (NACC) in its work, which is based on activating the relevant mechanisms. Recommendations include:

- Enhance the enforcement of the Asset and Interest Disclosure and Illicit Enrichment Law by equipping the NACC with forensic auditing capacity to detect discrepancies, strengthening secure digital infrastructure for declaration submissions, and moving towards establishing automated cross-checking systems with tax, property, and banking databases to support verification. The NACC should also be granted direct access to these data to effectively carry out its review and verification functions. Furthermore, the NACC should publish information on levels of compliance and instances of incorrect or incomplete disclosures to enhance transparency and public accountability.
- Increase institutional compliance with the Access to Information Law by providing enhanced training and guidance to public entities, ensuring timely responses to information requests, and promoting the publication of mandatory information (i.e. key administrative documents such as decrees, decisions, instructions, circulars, annual reports, and financial operations above a defined threshold), as well as the proactive disclosure of additional information (e.g. budgets, procurement, and staffing) across all public entities.
- Operationalize the Whistleblower Protection Framework by building on the existing institutional setup and addressing key coordination and implementation gaps through: clarifying institutional roles following the appointment of the NACC; facilitating multiple channels for whistleblowers – either directly to the NACC, via the centralized WBPO in Beirut (managed by the Court of Cassation Public Prosecution), or through the Court of Cassation Public Prosecution, the Financial Public Prosecution, or the Appellate Public Prosecution in all governorates, as per the 2020 legal amendment; strengthening coordination mechanisms between the NACC, Public Prosecution, Security Forces and the Civil Service Board (CSB) to ensure timely and effective management of disclosures, physical protection measures, and safeguards against professional retaliation in public employment; and finalizing and implementing standard operating procedures (SOPs) for both the NACC and WBPO, including secure and confidential reporting channels (e.g. hotline, encrypted email, online portal), reassignment protocols, and confidentiality guarantees.
- Consider initiating steps toward operationalizing the Asset Recovery Framework, including the gradual activation of the recovery unit within the NACC and the establish-

ment of the National Fund for recovered assets. This could be complemented by the development of preliminary procedures for tracing, freezing, and repatriating stolen assets, in alignment with international standards and national priorities.

- Strengthen enforcement and transparency mechanisms under the Public Procurement Law by ensuring full compliance through the application of uniform publication standards across all procuring entities. This includes the mandatory use of the Public Procurement Authority (PPA) website for publishing procurement notices, contract awards, tender documents, and implementation status updates. To reinforce transparency and accountability, introduce performance scorecards to monitor each entity's adherence to disclosure obligations under the PPL. These scorecards should be publicly accessible and updated regularly, allowing for comparative benchmarking and civil society oversight.
- Amend the Law on Combating Corruption in the Public Sector to explicitly extend its provisions to cover corruption in the private sector. This expansion should include provisions on the liability of legal persons, revolving door restrictions, and whistleblower protection mechanisms in the private sector, thereby addressing critical regulatory gaps and aligning with international standards such as UNCAC. Consequently, the mandate of the NACC should be broadened to encompass oversight and enforcement functions related to private sector integrity, enabling a more comprehensive and cross-sectoral approach to corruption prevention and accountability.
- Consider initiating preparatory steps towards amending the 2015 Ombudsman Law to institutionalize an independent mechanism for receiving, investigating, and resolving citizen complaints. The law should clearly define the Ombudsman's mandate, powers, and procedures.

2. Developing and adopting a comprehensive framework of integrity policies in the civil service that complements existing legislation and creating synergies with Anti-Money laundering frameworks

This framework would strengthen Lebanon's anti-corruption architecture beyond legal compliance; it should prioritize preventive measures, behavioural change, and institutional coherence. Specifically, it should include:

- Develop a dedicated and unified policy framework on conflict-of-interest management to identify, disclose, and sanction conflicts of interest across public entities, complemented by mandatory training for public officials.
- Adopt mechanisms to embed integrity standards into recruitment, promotion, compensation procedures (including integrating mandatory conflict of interest screening), as well as performance evaluations, and formalize partnerships with public training institutes and the National Anti-Corruption Commission to co-develop integrity curricula, and embed mandatory training modules into onboarding, promotion, and continuous training frameworks for public officials at all levels.
- Establish a comprehensive national framework to assess the adoption and implementation of integrity policies and measure their impact within public institutions, with the

National Anti-Corruption Commission responsible for its oversight and implementation. The system would need to be anchored in a set of standardized indicators or a national integrity index, enabling comparative analysis and evidence-based decision-making. It should track progress on key reforms – such as asset and interest declarations, access to information, whistleblower protection, and conflict of interest management – while identifying bottlenecks and areas for improvement. The system must include clear methodologies, institutional reporting obligations, and mechanisms for civil society engagement, with public dissemination of findings to reinforce transparency and accountability.

- Implement a mechanism for Regulatory Impact Assessment from an anti-corruption perspective to anticipate and mitigate corruption vulnerabilities in legal frameworks by developing a standardized RIA methodology to assess corruption risks in draft laws and existing legislation, and training legal drafters and parliamentarians on corruption-sensitive legislative design.
- Strengthen the linkages between corruption and Anti-Money Laundering efforts including through national risk assessment focused on corruption-linked money laundering – particularly involving politically exposed persons (PEPs) – integrating corruption indicators into financial intelligence analysis and reporting, promoting parallel financial investigations in corruption cases, and enhancing coordination between the Special Investigation Commission, NACC and the judicial authorities to ensure timely intelligence sharing, joint case development, and coherent enforcement.
- Develop a comprehensive policy and set of procedures to promote internal control and corruption risk management in public administration, building on lessons learned and tools piloted in selected entities, while ensuring scalability and contextual relevance.
- Establish and activate specialized internal audit units and develop clear guidelines for their work within the public administration, ensuring the institutionalization of this function and assigning clear responsibilities for following up on and implementing the recommendations issued in audit reports.

3. Enhancing institutional effectiveness and operational capacities to support anti-corruption efforts

| National Anti-Corruption Commission (NACC)

To consolidate the progress achieved since the establishment of the National Anti-Corruption Commission (NACC) and ensure its long-term effectiveness, the following measures are recommended:

- Complete and activate the staffing structure of the Commission through the Civil Service Board's implementation of the competitive examination stipulated in Law No. 175/2020, ensuring adequate human resources, technical expertise, and administrative continuity.
- Transition from reliance on volunteers and ad hoc support to a sustainable institutional model backed by national budget allocations and coordinated donor engagement.

- Develop and adopt a comprehensive and publicly available set of performance indicators and outcome-based metrics to assess the NACC's impact across its core mandates, particularly in corruption detection, investigation, and enforcement.
- Establish a periodic review mechanism to monitor progress, identify bottlenecks, and inform strategic adjustments.
- Strengthen the NACC's outreach to citizens through accessible complaint mechanisms, public reporting tools, and digital platforms.
- Deepen regional cooperation and knowledge exchange with peer institutions to enhance institutional learning and build capacities of NACC members and staff.

Public Procurement Authority (PPA), Procuring Units and Complaint Authority

- Expedite the full staffing and appointment of members of the PPA Board of Directors to ensure adequate technical and administrative capacity to fulfil its mandate.
- Disseminate clear guidance on the role of the PPA to prevent procedural delays and resource strain caused by misinterpretation.
- Finalize and institutionalize job descriptions and competency frameworks for procurement units within buying entities to ensure functional alignment.
- Establish and activate the Complaints Authority as a priority, providing a formal and independent mechanism for grievance redress, bidder protection, and corruption detection.
- Strengthen efforts to professionalize the procurement workforce through actions such as launching a national training strategy targeting procurement staff at both central and local levels. This should include modules on integrity standards, risk detection, and legal compliance, as well as certification pathways and continuous learning programs to build a cadre of specialized procurement professionals.
- Integrate periodically feedback loops from civic oversight and civil society tracking initiatives into procurement planning and evaluation processes.
- Develop a monitoring and evaluation framework to track progress in transparency and integrity in public procurement, including periodic surveys targeting public officials and the private sector.

Court of Accounts

- Modernize the oversight mechanisms of the Audit Bureau in line with international standards for external auditing and public accountability, drawing on lessons learned from recent reforms and the experiences of comparable institutions. This update should be undertaken alongside a review of the Audit Bureau Law to expand its powers, strengthen its independence, enable it to conduct performance audits, and adopt innovative practices for real-time expenditure oversight, with particular attention to highrisk spending areas.

- Expedite the appointment of judges and the recruitment for vacant positions within the Court of Accounts to strengthen institutional capacity and ensure timely execution of its oversight mandate.
- Institutionalize clear and standardized protocols for the referral of criminal violations, ensuring systematic follow-up with judicial authorities and Parliament.
- Build specialized capacities in forensic auditing, procurement oversight, and digital analytics supported by peer learning and technical exchange with international counterparts.
- Expand digital transparency tools – such as open data platforms and interactive dashboards – and proactively publish thematic and annual audit reports.
- Lead the development of a national evaluation framework that integrates performance dashboards, sectoral scorecards, and periodic impact assessments to monitor the effectiveness of public spending.

Central Inspection

- Develop the law related to the establishment of the Central Inspection Bureau.
- Accelerate staff recruitment within the Central Inspection to enable the institution to effectively carry out its mandate and fulfil its oversight responsibilities.
- Develop standardized audit protocols and inspection cycles across sectors to shift from reactive to risk-based oversight, prioritizing high-risk areas and systemic vulnerabilities.
- Scale up pilot performance auditing initiatives into a national performance audit program, incorporating sectoral risk matrices and corrective action plans.
- Formalize collaboration with the Court of Accounts and other oversight bodies to ensure audit complementarity, shared intelligence, and coordinated follow-up.
- Establish a professional development framework for inspectors, including certification in forensic auditing, digital analytics, and emerging oversight methodologies.
- Integrate the Central Inspection's digital platforms with national systems for budgeting, procurement, and service delivery to enable cross-sectoral analytics and real-time monitoring.
- Link the Central Inspection Bureau to the database of entities under its oversight as a step toward implementing digital auditing.

Higher Disciplinary Authority

- Accelerate adoption of the draft law to modernize the Committee's mandate, staffing, and referral mechanisms.
- Establish binding coordination agreements and referrals protocols with Central Inspection, Civil Service Board, and ministries to ensure timely and substantiated case transmission.

- Publish summaries of annual reports and disciplinary decisions to enhance public trust and institutional visibility while ensuring the necessary confidentiality and data protection.
- Mobilize international support to strengthen operational capacity, including digital case management.

Civil Service Board

- Develop a comprehensive Code of Conduct for public officials that establishes clear and enforceable standards for ethical behaviour, professional integrity, and accountability. The Code should include provisions addressing conflicts of interest, gift acceptance, and post-employment restrictions; guidelines that promote transparency, impartiality, and responsible use of public resources; and include enforcement mechanisms such as disciplinary procedures and confidential reporting channels. To ensure consistent application, mandatory and continuous training modules should be introduced across institutions, and the Code should be fully integrated with existing legal frameworks – including asset and interest disclosure systems – to reinforce coherence and institutional credibility.
- Develop integrity-based human resources management systems, including risk screening, ethics training, and whistleblower protection protocols.
- Deliver targeted training for Civil Service Board personnel in anti-corruption standards, digital HR tools, and strategic workforce planning.
- Enable the Civil Service Board to conduct an updated, comprehensive survey of public sector employees, regardless of their mode of recruitment (competitive examination or contractual appointment).

4. Consolidating institutional coordination and collaboration

- Improve coordination on the civil service reform by leveraging the newly appointed Inter-Ministerial Committee on Administrative Reform as a strategic platform to harmonize mandates, streamline reform efforts, and promote a unified vision for administrative modernization. The roles of OMSAR, the Civil Service Board, and the NACC should be clearly defined within this framework, particularly in relation to advancing integrity reforms in the civil service.
- Institutionalize structured coordination among oversight bodies and with the NACC by establishing a formal, multi-institutional mechanism for collaboration at both operational and strategic levels. This should include joint coordination mechanisms, shared strategic planning frameworks, and interoperable digital information systems to facilitate data sharing, joint investigations, and coherent follow-up on audit and control findings. The NACC must be systematically integrated into the work of key oversight institutions – including the Court of Accounts, Central Inspection, and Civil Service Board – to ensure a unified response to systemic corruption risks.

5. Advancing judicial reform and anti-corruption enforcement

- Prioritize the enactment of laws on the independence, integrity and effectiveness of judicial, administrative, and financial courts.
- Institutionalize transparent criteria for judicial appointments and performance evaluations, supported by a publicly accessible and mandatory code of conduct and continuous ethics training.
- Institutionalize transparency and public reporting through annual publication of judicial annual activity reports, as mandated by the Access to Information Law, including performance metrics, case statistics, and disciplinary actions.
- Assess and scale up promising initiatives for the electronic distribution of judicial files, ensuring nationwide implementation and system interoperability.
- Launch a national digitalization roadmap for court case management, with clear timelines, budget allocations, and follow-up mechanisms.
- Establish citizen-facing structures in courthouses to facilitate access to information, provide guidance, and enable grievance redress. In parallel, accelerate reforms in forensic medicine and commercial registry management to reduce discretionary practices and improve service quality, and develop a unified framework for judicial oversight that integrates short-term monitoring tools with long-term institutional accountability systems.
- Enhance legal and technical capacity to prosecute corruption by designing national specialized training programs for judges, prosecutors, and oversight bodies (especially the NACC) in forensic auditing, financial investigations, asset tracing, and cross-border cooperation. In parallel, institutionalize coordination between oversight bodies, the NACC, and the Public Prosecution to ensure timely and effective prosecution of corruption cases.

6. Strengthening institutionalized coordination, structured collaboration, and co-creation with non-governmental actors

- Institutionalize structured policy dialogue with the private sector on key priority areas, including public procurement integrity, by establishing a formal and recurring mechanism led by the Public Procurement Authority (PPA) with participation from private sector stakeholders (including business associations, chambers of commerce, sectoral federations, and civil society observers). This platform should hold regular consultation cycles to: (i) discuss procurement reforms, integrity standards, and implementation challenges, including feedback on Standard Bidding Documents (SBDs), supplier obligations, and digital platform usability; and (ii) jointly develop integrity tools such as supplier codes of conduct, whistleblower protection protocols tailored to private sector realities, and collective action initiatives such as Integrity Pacts. The platform should commit to publishing dialogue outcomes and policy recommendations to reinforce transparency and demonstrate responsiveness to stakeholder concerns.
- Institutionalize collaboration with academic observatories to advance research on corruption within universities and support the anti-corruption strategy – particularly the

work of the NACC, oversight bodies, and OMSAR – through rigorous research and the use of advanced statistical tools. This collaboration should aim to i) support postgraduate research and advanced studies on corruption dynamics, institutional vulnerabilities, and reform impact, with a focus on the national context; ii) leverage the expertise of established observatories and exchange of data to generate sectoral diagnostics, integrity risk assessments, and policy briefs that inform national strategies; iii) create joint research platforms and data-sharing protocols between public institutions and universities to enhance transparency and analytical capacity; iv) embed academic findings into policymaking cycles, including the design of training modules, public awareness campaigns, and performance indicators.

7. Providing the necessary conditions and resources to support the implementation of future iterations of anti-corruption

- Strengthen domestic resource commitments by prioritizing anti-corruption reform in national budgeting processes. This includes increasing financial allocations to oversight institutions, the judiciary, and the NACC, with particular attention to digital infrastructure, institutional modernization, and operational capacity. A more strategic and transparent budgeting approach is needed to align resource with NACS priorities and ensure sustainable implementation.
- Address human resources and operational gaps with immediate efforts to assess and address critical shortages in staffing, technical expertise, and basic operational tools across public institutions involved in NACS implementation.
- Establish a regular formalized donor coordination mechanism on anti-corruption reforms and expand support to underfunded reform areas. Building on the Strategy's role as a coordination framework, this mechanism should ensure that financial and technical assistance is strategically aligned, effectively distributed, and responsive to evolving needs. A joint platform within the NACS implementation structure could help harmonize support across pillars and reduce disparities in the implementation of NACS outputs.

8. Strengthen sustainability of reforms and visibility of results achieved

- Accelerate institutionalization and mainstreaming of integrity and anti-corruption measures are systematically embedded across the public administration. This requires sustained capacity building, effective inter-agency coordination, and integration into standard operating procedures. To ensure long-term impact, sustainability strategies for donor-supported initiatives need to be developed, aiming to secure institutional uptake and reinforce national ownership of reform efforts.
- Enhance strategic public communication by adopting a coordinated communication strategy to disseminate NACS objectives, milestones, and achievements. This should include media outreach, media partnerships, and developing digital platforms to improve visibility, counter misinformation, and foster public buy-in.

1 Introduction

1.1 Context

1. The Republic of Lebanon launched its **first Anti-Corruption Strategy in 2020**[1]. This national strategy is designed to foster three strategic objectives: enhancing transparency, activating accountability, and ending impunity which are translated into seven outcomes: 1) Specialized Anti-Corruption Legislation Completed and Implemented in Accordance with International Standards, 2) Higher Levels of Integrity in Public Function Achieved, 3) Public Procurement System Less Vulnerable to Corruption, 4) A Judicial System More Impartial and Capable of Fighting Corruption, 5) Oversight Bodies More Specialized and Effective in Fighting Corruption, 6) Society Empowered to Participate in Fostering and Promoting a Culture of Integrity, 7) Preventive Measures against Corruption Integrated at the Sectoral Level. The NACS provided a **unified national vision on required anti-corruption reforms.**

2. The Strategy was developed through a cumulative process led by the Ministerial Anti-Corruption Committee and its supporting technical committee, both established

1- Decision of the Council of Ministers No. 7/2020 in December 2011. 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. **The development of the NACS 2020–2025 was itself a significant institutional achievement**, shaped by a multi-year, consultative process that brought together diverse actors across government and society. Far from being a purely technical exercise, the Strategy emerged through iterative dialogue, structured coordination, and sustained commitment from national stakeholders, even amid profound political, economic, and social instability. In this sense, the Strategy represents not only a policy framework but also the outcome of a broader state-building effort, laying the groundwork for reform in a particularly challenging period.

3. It is important to highlight at the onset that Lebanon's capacity to implement its National Anti-Corruption Strategy (NACS) between 2020 and 2025 was severely constrained by a **multidimensional crisis and persistent political instability**. Over this period, the country endured frequent cabinet reshuffles, prolonged caretaker governments, and extended institutional vacuums – most notably a two-year absence of a fully empowered executive authority after 2022. While governments were nominally formed, including those led by Tammam Salam (2014–2016), Saad Hariri (2016–2019), Hassan Diab (2020), and Najib Mikati (2021), many operated with limited mandates or were paralyzed by sectarian gridlock and lack of parliamentary consensus. In October 2019, the Hirak movement in Lebanon erupted as a spontaneous, nationwide protest against decades of entrenched corruption, economic mismanagement, and sectarian governance. This led to the resignation of Prime Minister Saad Hariri's Government in late 2019, followed by the formation of a technocratic cabinet led by Hassan Diab in early 2020, which subsequently resigned after the Beirut port explosion. Prime Minister Najib Mikati took office in September 2021 after 13 months of caretaker governance. The crisis peaked in 2020, when Lebanon faced a convergence of economic collapse, financial paralysis, and the COVID-19 pandemic. GDP contracted by 20 percent, inflation exceeded 50 percent, and the Lebanese pound lost over 80 percent of its value, devastating household purchasing power and pushing over half the population into poverty[2]. The banking sector froze, credit flows halted, and public revenues collapsed, widening the fiscal deficit and crippling basic service delivery. The Beirut Port explosion in August 2020 further compounded the crisis, causing massive human and infrastructural losses. These overlapping emergencies created a context of acute institutional dysfunction, severely undermining the operationalization of NACS expected outcomes, delaying coordination mechanisms, and weakening the effectiveness of oversight bodies. The election of President Joseph Aoun and appointment of Prime Minister Nawaf Salam in early 2025 marked a potential turning point in Lebanon's political trajectory, formally ending a prolonged caretaker period. Their leadership has sparked cautious optimism among reform advocates. However, the legacy of systemic paralysis remains deeply entrenched. Despite renewed political commitments, the persistent lack of adequate financial, human, and institutional resources continues to pose significant risks to the sustained implementation of the National Anti-Corruption Strategy (NACS).

2- https://lebanon.un.org/2020-UN-Lebanon-Annual-Results-Report

January 2025

Turning point

New leadership and cautious optimism

The election of President Joseph Aoun and appointment of Prime Minister Nawaf Salam in early 2025 marks a potential turning point in Lebanon's political trajectory, formally ending a prolonged caretaker period.

2022-2024

Institutional vacuum

Absence of a fully empowered executive authority

Extended periods of institutional vacuums and the absence of a fully empowered executive authority undermine operationalization of NACS expected outcomes, delaying coordination mechanisms, and weakening the effectiveness of oversight bodies.

May 2020

Institutional achievement

Adopting the National Strategy

The Council of Ministers adopts the National Anti-Corruption Strategy 2020-2025 following a multi-year, consultative process that brought together diverse stakeholders through iterative dialogue, structured coordination, and sustained commitment.

October 2019

Political crisis

October 17 Uprisings

The eruption of nationwide protests in October 2019 against decades of entrenched corruption and mismanagement leads to the resignation of Prime Minister Saad Hariri's government.

February 2016

Launch phase

Beginning the development of the Strategy

The drafting process begins based on the reports and recommendations produced during a preparatory phase, through a consultative process involving government and civil society actors.

December 2011

Reform milestone

Establishment of the specialized committees

The establishment of the Ministerial Anti-Corruption Committee and its supporting technical committee lays the institutional framework and the first roadmap for developing the National Strategy.

Objectives and scope

4. This final independent evaluation aims to assess the key results achieved during the implementation of Lebanon's National Anti-Corruption Strategy (2020–2025). It seeks to identify strengths, gaps, and areas for improvement to inform the revision of the strategy for the forthcoming five-year cycle. The evaluation is conducted at the outcome level, focusing on the extent to which the seven strategic outcomes were achieved and analyzing how the corresponding outputs contributed to their realisation.

5. The evaluation covers the full implementation period, from the official adoption of the strategy in May 2020 through September 2025.

Methodology and approach

6. In line with the UN Evaluation Group Norms and Standards and the internationally recognized OECD-DAC Evaluation Criteria, this independent evaluation is guided by six core dimensions. **Relevance** examines whether the NACS addresses nationally identified priorities and responds to pressing anti-corruption challenges. **Coherence** assesses the extent to which the strategy aligns with other national policies, institutional mandates, and external support mechanisms. **Effectiveness** focuses on the achievement of intended outcomes and the degree to which objectives have been met. **Efficiency** evaluates the optimal use of resources in delivering results, including financial, human, and institutional capacities. **Impact** considers the broader changes generated by the NACS, including shifts in institutional behaviour, public trust, and governance performance. Finally, **Sustainability** determines whether the results are likely to endure over time, supported by institutionalization, capacity development, and continued political commitment (see Annex 4).

7. Pursuant to the decision to conduct an independent evaluation of the National Anti-Corruption Strategy 2020–2025, Ms. Sana Al Attar, independent evaluator, was commissioned by the United Nations Development Programme (UNDP), with funding from the European Union and the Government of the Kingdom of Denmark.

   This evaluation was conducted during the period extending from 1 August to 6 October 2025, following a mixed-methods approach combining both quantitative and qualitative data collection and analysis to ensure the triangulation of information collected from different sources and stakeholder groups, thereby increasing the validity of the findings. As such, data and information were collected through:

   › **Desk review:** Analysis of documents related to the National Anti-Corruption Strategy, including relevant laws, regulations and national monitoring reports and reviews as well as analysis of national, regional and international quantitative data, civil society, International Financial Institutions and development partners reports.

   › **Interviews and consultations with key informants:** Interviews conducted with representatives from various groups of stakeholders including central administration, civil society and private sector through physical meetings and online meetings conducted in Beirut in September 2025.

   › **Online surveys:** Three anonymous online surveys were disseminated to inform the assessment of progress made under the National Anti-Corruption Strategy and to identify areas for improvement. The surveys targeted a diverse range of stakeholders, including government institutions directly involved in the Strategy's implementation, non-governmental actors such as civil society organizations, private sector representatives, and academic institutions, as well as international development partners providing technical and financial support.

8. The draft evaluation report was presented to the Technical Anti-Corruption Committee, where the results and recommendations were discussed and observations were provided thereon. Following a review of the comments and the incorporation of those deemed appropriate and relevant, a copy of the report was submitted to the Ministerial Anti-Corruption Committee for review and feedback, thereby contributing to greater alignment with the national institutional anti-corruption framework, without prejudice to the independence of the evaluation.

9. The recommendations were formulated with a forward-looking orientation, grounded in the evaluation's findings and stakeholder consultations. They are intended to inform the iterative development of future strategies by drawing on lessons learned, identifying systemic gaps, and proposing actionable improvements.

10. Despite the valuable insights generated through this evaluation, **several limitations affected its overall scope and depth**. The compressed timeframe and the limited availability of key stakeholders – posed challenges to inclusive and comprehensive engagement. Furthermore, in some cases, the evaluation team was able to gather only limited input from stakeholders due to staff turnover and institutional information gaps, which affected both the availability and continuity of relevant data. As a result, certain sections of the analysis are less detailed, reflecting the uneven levels of responsiveness and documentation across stakeholder institutions. In addition, the absence of a midterm review further constrained the ability to assess progress midway through the Strategy's implementation. Furthermore, restricted access to quantitative data, baseline indicators, and defined targets limited the evaluation's ability to measure outcomes against planned benchmarks. At the time of the evaluation, only two annual progress reports (2021 and 2024) had been finalized, while the third was still under preparation. Although preliminary findings were shared, the evaluation team did not have access to a complete monitoring picture from March 2024 to December 2025. Furthermore, given the Evaluation's focus on the outcomes of the National Anti-Corruption Strategy 2020–2025, certain areas related to anti-corruption – falling outside the Strategy's formal scope – were not analysed in depth. These include for instance broader public financial management, financial and banking sector governance, state-owned enterprises, and anti-money laundering efforts. The broader scope of this diagnostic is anticipated to complement the current evaluation by providing a more comprehensive picture of Lebanon's anti-corruption framework and shedding light on reforms that remain pending.

2
Evaluation

2.1 Relevance and coherence

11. **Anti-corruption efforts, as outlined in the National Anti-Corruption Strategy (NACS) 2020–2025, were reflected in successive cabinets' formal policy statements. However, these commitments were not systematically linked to national operational planning or budgeting frameworks.** In Lebanon, the cabinet declaration – also known as the ministerial statement/ministerial declaration البيان الوزاري – serves as a formal policy statement outlining each cabinet's priorities and commitments and is considered to be a pivotal tool of strategic planning and political signalling. It outlines the incoming government's policy priorities, reform commitments, and governance vision, effectively functioning as a short- to medium-term strategic roadmap. While not legally binding, it carries significant weight in shaping priorities, guiding donor engagement, and framing parliamentary confidence votes. In the context of anti-corruption strategy implementation, the cabinet declaration is especially critical: it determines whether the government formally endorses NACS direction and measures. When declarations omit or vaguely reference these elements, it signals weak political will and undermines strategic co-

herence. The ministerial declarations reflected varying degrees of engagement, ranging from explicit references to key measures to broader affirmations of commitment to reinforcing oversight and accountability to combat corruption in the current government, which could undermine political support to implement the NACS in all its components. Furthermore, the ministerial statements remain limited in their effectiveness as tools for strategic planning and for aligning government resources with national priorities. They are not accompanied by a detailed implementation roadmap or a corresponding budget framework, which limits their operational impact and highlights a broader gap in strategic planning to translate political commitments into actionable implementation in government actions. In terms of high-level political commitment, it is worth noting that the Presidential oath of the 2025 elected President Joseph Aoun reaffirmed a clear dedication to anti-corruption and judicial reform – particularly with regard to strengthening judicial independence, activating the Judicial Inspection Authority, simplifying trial procedures, and accelerating the issuance of rulings[3].

12. **Anti-corruption has been prioritized across strategic reform frameworks, with the NACS 2020-2025 serving as a key driver of reform – though challenges remain in coordination and national ownership.** The Reform, Recovery and Reconstruction Framework (3RF)[4] launched in December 2020 following the Beirut Port explosion, explicitly recognizes that anti-corruption is central to Lebanon's recovery and reform process, and supports the implementation of the National Anti-Corruption Strategy through targeted actions. These include strengthening judicial independence, operationalizing oversight institutions (such as the Public Procurement Authority, the Civil Service Bureau and the Courts of Audit), enforcing the Access to Information Law and its Action Plan, and advancing public procurement reform. Additional priorities involve implementing corruption risk management programs and operationalizing the Whistleblower Protection Law. To coordinate these efforts, a dedicated Working Group on Anti-Corruption, Public Financial Management, Public Procurement, Civil Service, and Public Administration Reform[5] was established. It brings together key public institutions and international development partners such as the Public Procurement Authority (PPA), the Civil Service Board and the National Anti-Corruption Commission (NACC), and serves as a platform for needs identification, strategic planning of interventions, and coordination among stakeholders. However, according to the 2024 Working Group's conclusions[6], enhanced coordination among donors and stakeholders remains a key challenge to avoid fragmentation and ensure effective reform implementation. The Group also emphasized the need for a more inclusive approach to foster national ownership, particularly through stronger engagement of public administration and civil society actors. In addition, it highlighted the importance of future interventions on administrative reform to be further aligned with existing opportunities offered by National Anti-Corruption Strategies[7].

13. **The National Anti-Corruption Strategy (NACS) 2020–2025 has demonstrated strong alignment with Lebanon's international and regional anti-corruption commitments**, notably the United Nations Convention against Corruption (UNCAC) and the Arab An-

3- https://www.presidency.gov.lb/posts/khtab-alqsm-althy-alqah-reys-aljmhwryh-alamad-jwzaf-awn-fy-mjls-alnwab-bad-qsm-alymyn-aldstwryh
4- The Reform, Recovery and Reconstruction Framework (3RF):
https://www.lebanon3rf.org/sites/default/files/2023-05/Lebanon-Reform-Recovery-and-Reconstruction-Framework-3RF.pdf
5- https://www.lebanon3rf.org/civil-service-and-public-administration-reform
6- Minutes of Meeting, January 11, 2024 - https://view.officeapps.live.com
7- Ibid.

ti-Corruption Convention. Lebanon became a State Party to the UNCAC in 2009 and ratified the Arab Anti-Corruption Convention in 2019, committing to harmonize its national legal framework with the provisions of both instruments. The NACS document has therefore relied on UNCAC as a foundational reference for defining corruption, identifying risk areas, and structuring its strategic analysis. Its outcomes and outputs are designed to ensure alignment with – and fulfilment of – Lebanon's international obligations. In this context, one of the key outcomes is the development and implementation of specialized anti-corruption legislation in accordance with international standards (outcome 1). This includes addressing critical legal gaps such as the absence of comprehensive whistleblower and witness protection, access to information, asset recovery legislation, and conflict of interest regulation, as well as establishing a centralized institution for combating corruption (National Anti-Corruption Commission). This requires introducing legislative amendments to the anticorruption laws, particularly Law No. 175/2020 in light of recommendations emerging from Lebanon's participation in the UNCAC review mechanism. To ensure sustained progress, Lebanon should institutionalize a regular and transparent review process – one that aligns with UNCAC's self-assessment protocols and peer review cycles. This would enable the identification of persistent gaps and facilitate the enactment of targeted legal reforms necessary to strengthen Lebanon's compliance with international anti-corruption standards.

14. **The NACS 2020–2025 is grounded in a comprehensive approach and a coherent architecture of expected outcomes and outputs**. It articulates a clear definition of corruption aligned with international standards and reflects how these standards are embedded in Lebanese legislation. The strategy also presents a diagnostic overview of the corruption landscape, past reform efforts, and remaining gaps – forming the basis for its outcome framework. Anchored in a Theory of Change, the strategy outlines a logical progression from problem identification to desired impact. It recognizes systemic challenges such as public distrust, perceived corruption in public employment, procurement, and service delivery (e.g., health and social security), and the judiciary's limited capacity to prosecute corruption. These issues inform four core outcomes aimed at enhancing integrity in public functions (outcome 2), strengthening the integrity of the public procurement system (outcome 3), promoting a more impartial and capable judiciary (outcome 4), and advancing preventive measures against corruption at sectoral levels (outcome 7). The Strategy document also identifies enabling and constraining factors – such as legislative gaps, bureaucratic inefficiencies, and weak oversight – which shape two additional outcomes: completing specialized anti-corruption legislation (outcome 1) and strengthening oversight (outcome 5), in addition to a dedicated output to promoting administrative simplification and transparency (output 7.1). The strategy further emphasizes cross-cutting engagement and awareness-raising to foster a whole-of-society approach to anti-corruption (outcome 6). Moreover, the NACS adopts a comprehensive and integrated methodology that combines both cross-cutting and sector-specific approaches. It emphasizes that the fight against corruption must occur at two complementary levels: first, at the national level through overarching legal and procedural reform and second, at the sectoral level, where tailored measures can be gradually introduced to reflect the specificities of each sector. In line with Results-Based Management (RBM) principles, the outcomes of the strategy are supported by a set of defined outputs and an implementation plan that outlines key

areas of work, timelines, and responsible entities. Additionally, the NACS includes an initial monitoring and evaluation (M&E) matrix that identifies key results indicators aligned with strategic objectives, complemented by an M&E plan specifying the type and frequency of data to be collected to support ongoing monitoring efforts. However, the current framework presents several limitations. Notably, no baselines, milestones, or targets were defined, which hinders the ability to measure progress over time[8]. Furthermore, the indicators included in the strategy are formulated only at the level of strategic objectives, without corresponding indicators at the outcome level, thereby limiting the capacity to assess the effectiveness and impact of specific interventions (see section 2). This dual-level approach – combining cross-cutting reforms with sector-specific measures – and the overall robust methodology applied in developing the strategy represent a **noteworthy regional best practice**. It reflects a holistic and inclusive vision for sustainable anti-corruption reform, grounded in both institutional coherence and contextual responsiveness. Survey results further reinforce this assessment, indicating a broadly positive understanding of the NACS across stakeholder groups. Among public administration respondents, 50 percent rated their understanding of the strategy as "very clear" and 50 percent as "somewhat clear." Non-governmental actors reported similarly high levels of familiarity, with 30 percent indicating a "very clear" understanding and 70 percent a "somewhat clear" understanding. Responses from international development partners showed that 50 percent had a clear understanding of the expected results and objectives of the NACS, while the remaining 50 percent reported a somewhat clear understanding. Importantly, stakeholders also affirmed that the strategy's outcomes are clearly defined and address relevant anti-corruption priorities and challenges. 96 percent of public administration respondents and 80 percent of non-governmental actors either agreed or strongly agreed that the NACS outcomes are well-articulated and aligned with Lebanon's governance risks. Among international development partners, 75 percent confirmed that the strategy was responsive to sector-specific vulnerabilities and proposed targeted interventions. Furthermore, respondents broadly agreed that the 34 outputs defined under the NACS were relevant to achieving its seven expected outcomes. All international development partners (100 percent) affirmed this alignment. Among non-governmental actors, 85 percent agreed or strongly agreed. Furthermore, 81 percent of public administration respondents confirmed a strong alignment of the strategy with national priorities and with their organizational priorities. These findings suggest that the strategic orientation and relevance of the NACS are widely recognized and generally aligned with national and sectoral priorities.

15. **The governance mechanism of the NACS showed a robust design, however, in practice, certain structures have deviated from their originally intended design, others have not been operationalized and overall, there were significant gaps in frequency of meetings.** The governance mechanisms of the NACS were established to ensure ownership, coordination, effective measurement, and risk management of results achieved. However, in practice, certain structures have deviated from their originally intended design, others have not been operationalized, and the frequency of meetings has fallen short of the prescribed schedule, affecting strategic oversight and continuity.

8- It is worth noting that the strategy document does foresee the collection of baseline data by assigning to the Technical Anti-Corruption Committee and other relevant parties the responsibility of conducting surveys, questionnaires, and studies within six months of the strategy's approval.

First, the Ministerial Anti-Corruption Committee[9] and its supporting Technical Committee[10], played a pivotal role in overseeing and guiding the NACS 2020-2025 development and execution. In terms of the committee functioning and continuity, the Committees have convened less frequently than originally stipulated in the decisions of the Presidency of the Council of Ministers, which required meetings every three months. In practice, Technical Committees meetings have occurred on an annual basis, with documented sessions held in 2020, 2022, 2024, and 2025. Further examination of participant lists reveals that while overall attendance rates have remained high, the institutional representation has varied significantly from year to year. Only a core group of selected representatives have consistently participated throughout the five-year strategy period. There was greater stability in representation between the 2022 and 2024 meetings, followed by notable changes in 2025. Although this fluctuation does not inherently pose a problem - provided institutional memory is preserved and proper handover and induction processes are in place – consultations revealed that newly appointed members, while generally well-informed about the strategy itself, did not always possess sufficient background on previous meetings, implementation challenges, or unresolved issues. **This gap has limited their ability to fully engage in strategic discussions or contribute to continuity in decision-making**. Overall, consultations highlighted the relevance and effectiveness of the governance mechanism of the NACS. It provided an effective process to coherently pursue the implementation of the NACS. The survey to public administration, showed that 4 percent of respondents considered the mechanism very effective and 44 percent rated it as moderately effective, acknowledging its positive role while noting challenges in coordination and follow-up. The role of Office of State for Administrative Reform (OMSAR) as the Committee's secretariat was widely commended during consultation. Responses to the survey for public administration, indicate a broadly positive assessment of the coordination efforts provided by OMSAR, in its role as Chair of the Technical Committee supporting the Ministerial Committee for Anti-Corruption. Specifically, 72 percent of respondents rated OMSAR's coordination as "good," while 20 percent considered it "excellent." These results reflect a strong institutional recognition of OMSAR's role in facilitating inter-agency collaboration and supporting the implementation of the NACS. Despite a very complex political, social and economic context including political tensions, media pressure, limited resources, and inconsistent political support, the governance structure of the NACS effectively carried out many of the responsibilities assigned to them it. **Most importantly, it sustained commitment and technical stewardship and maintained continuity in advancing the strategy's implementation**. While the Ministeri-

9- The Ministerial Committee was established and periodically reviewed through a series of decisions issued by the Presidency of the Council of Ministers. Decision No. 156 (2011) formally created the Committee, chaired by the Prime Minister and deputized by the Minister of State for Administrative Reform, with participation from the Ministers of Finance, Justice, and Interior. Its mandate included developing the national anti-corruption strategy, following up on Lebanon's national and international commitments, and coordinating with international development partners. Decision No. 69 (2017) temporarily added the newly created Minister of State for Anti-Corruption, though this was later annulled following the ministry's dissolution. Decision No. 139 (2021) re-established the Committee and tasked it with overseeing the implementation and monitoring of the NACS 2020–2025. Decision No. 21 (2024) added the President of the newly created National Anti-Corruption Commission as an observer. Most recently, Decision No. 73 (2025) reaffirmed the Committee's role in developing and implementing anti-corruption strategies, while expanding its responsibilities to include engagement with civil society, the private sector, media, and academia in support of national anti-corruption efforts.

10- The Technical Committee supporting the Ministerial Anti-Corruption Committee was established and periodically reviewed through a series of decisions issued by the Presidency of the Council of Ministers. Its primary role is to provide technical and expert guidance to the Ministerial Committee, including validation of proposals and strategic inputs. It was first established by Decision No. 157/2011 and chaired by the Office of the Minister of State for Administrative Reform (OMSAR). Its membership included representatives from the Presidency of the Council of Ministers, Ministry of Finance, Ministry of Justice, Ministry of Interior and Municipalities, High Judicial Council, Central Inspection, Civil Service Bureau, Court of Accounts, Public Prosecutor at the Court of Cassation, Financial Public Prosecution, High Disciplinary Authority, Central Bank, and OMSAR. Decision No. 108/2014 added the State Council to the Committee's membership. Decision No. 68/2017 temporarily included a representative from the Office of the Minister of State for Anti-Corruption, though this was annulled following the dissolution of the ministry.

Decision No. 140/2021 re-established the Technical Committee with the same membership, and Decision No. 172/2021 added a representative from the Special Investigation Unit at the Central Bank. Decision No. 108/2024 further expanded the Committee to include representatives from the Public Procurement Authority and the National Anti-Corruption Commission. Finally, Decision No. 74/2025 reaffirmed the Committee's role and updated its mandate to support the development and implementation of anti-corruption strategies, in addition to its previous responsibilities. These now include engagement with civil society, the private sector, media, and academic institutions in support of national anti-corruption efforts.

al and to a greater extent the Technical Committee played a clear and visible role in steering the implementation of the NACS – particularly by convening the appropriate thematic groups and ensuring the production of annual progress reports – it did not fully activate several of its other mandated functions[11]. Notably, the Committees fell short in fostering structured consultations and joint partnership with non-governmental stakeholders, including civil society organizations, the private sector, universities, and media and academia. Furthermore, it did not play a substantive role in coordinating with donors on supporting the implementation of the NACS. These gaps limited the Committee's ability to promote inclusive engagement and strategic alignment across the broader anti-corruption ecosystem.

Secondly, the NACS document originally foresaw the establishment of **dedicated task forces** centred on outcomes to develop annual work plans for each of the seven targeted outcomes, accompanied by corresponding budgets and measurement indicators. In practice, however, this structure was not operationalized as intended. Instead, ad hoc task forces[12] were formed on a case-by-case basis to address specific issues, rather than through an outcome-oriented structure. While the task forces played an essential role in advancing the issues they were mandated to address, they did not constitute adequate mechanisms for coordinating coherent and consistent progress across all strategic objectives and outcomes. This ad hoc approach **underscores the need for a shift in mindset – from issue-based responses to a results-based focus.** Establishing structured task forces aligned with each strategic outcome would have not only enhanced coherence but also provided a platform for collective efforts across institutions. **Such a shift would have fostered shared ownership, enabled targeted resource allocation, and strengthened accountability in achieving the NACS objectives**.

Thirdly, a Monitoring and Evaluation Team (M&E) was foreseen to be appointed upon the president of the Technical Anti-Corruption Committee decision within three months of the approval of the Strategy. However, this structure was not formally established, resulting in the absence of a comprehensive Monitoring and Evaluation (M&E) framework. **The lack of clearly defined indicators, baselines, and targets has hindered the ability to systematically track progress and assess results**. While OMSAR assumed the responsibility of coordinating the development of annual progress reports, the overall monitoring function remained suboptimal. It is worth noting, however, that there is an overall positive outlook regarding the support provided by OMSAR in this area. Survey responses from public administration officials evaluating OMSAR's role in monitoring and evaluation show that 56 percent rated the support as "good" and 28 percent as "excellent." These results reflect a strong institutional appreciation for OMSAR's contribution to monitoring and strategic follow-up under the National Anti-Corruption Strategy. In addition, the Strategy had formally assigned the National M&E Team the mandate to assess risks, propose mitigation measures, and develop and update a risk matrix. These components were not operationalized during implementation. Given Lebanon's highly volatile and sensitive context, the absence of a dedicated and functioning risk mitigation plan, along with the lack of systematic identification of potential risks, significantly limits the Strategy's ability to anticipate and respond to contextual shifts or emerging challenges. Strengthening this dimension in future iterations would

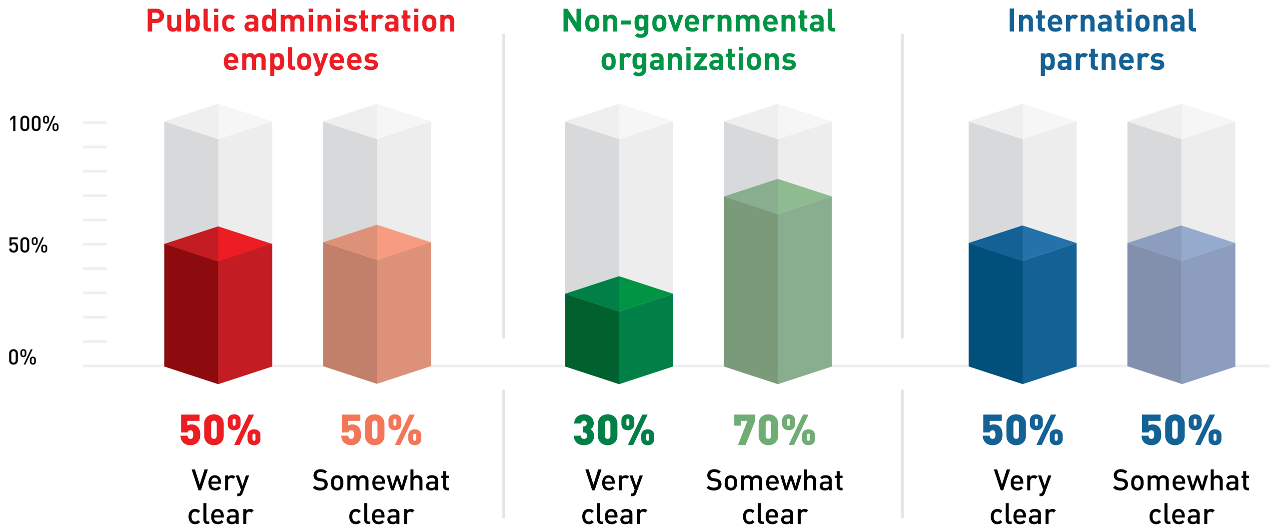
11- Article 2 of Decision No. 73/2025 on Ministerial Anti-Corruption Committee and Article 3 of Decision no.74/2025 on the Technical Committee supporting the Ministerial Anti-Corruption Committee.

12- Seven working groups were reported as having been established under the NACS framework. These included: Compliance of Anti-Corruption Laws with international standards (initially established in 2020 and extended in 2022), Effective Implementation of the Whistleblower Law (2020), Implementation of the Access to Information Law (2020), Establishment of the National Anti-Corruption Commission (2020), Youth Participation (2024), Gender Lens in Anti-Corruption Efforts (2024), and Private Sector Integrity (2025).

enhance the strategy's responsiveness and adaptability. Overall, consultations with stakeholders highlighted that coordination with OMSAR across these structures was notably fluid, it however reinforced the perception that the monitoring and follow-up on implementation of Strategy is primarily the responsibility of OMSAR rather than being a shared institutional responsibility. In addition, this perception may have contributed to a diminished level of engagement in the strategic steering of the Strategy. As a result, many stakeholders concentrated primarily on implementing the initiatives within their direct remit, while broader strategic frameworks and the overarching objectives of the NACS were, at times, overlooked.

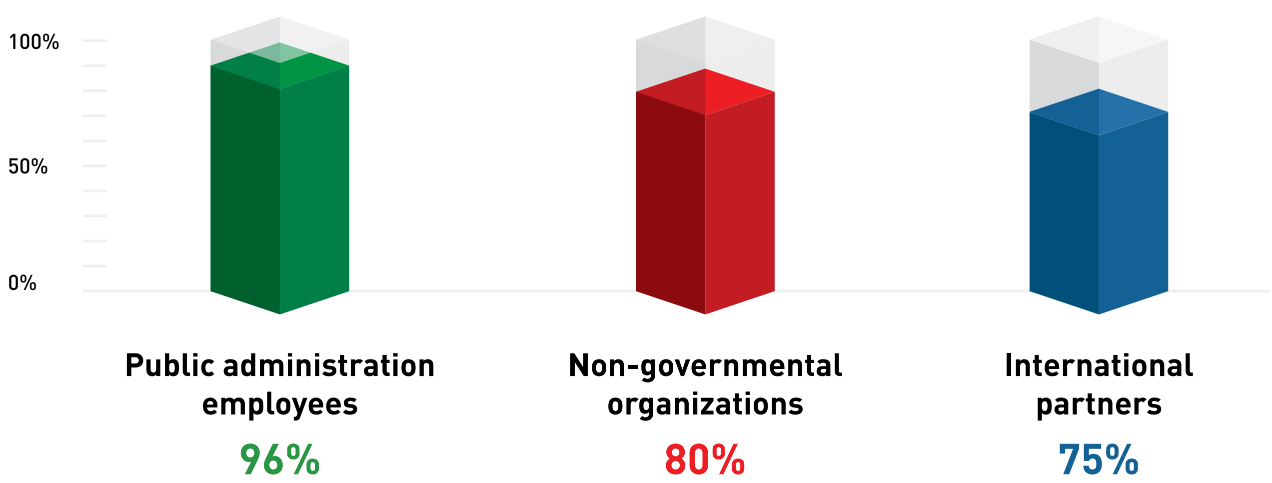
Level of understanding of the goals of the National Anti-Corruption Strategy

Percentage of participants who rated their understanding as "somewhat clear" and "very clear"



Outcomes clearly defined and aligned with governance risks

Percentage of respondents who 'agree' or 'strongly agree'



16. **Diverse non-governmental stakeholders were actively involved in the design of the NACS 2020-2025; however, their participation and collaboration were not institutionalised in regular and coordinated manner.** Civil society organizations (CSOs), private sector actors, academia, and media representatives contributed to shaping the strategic priorities and thematic focus areas, as evidenced by the strategy document. However, regular and coordinated collaboration with non-governmental actors was not operationalized, despite being explicitly mandated by the decision establishing the Ministerial and Technical Committees as previously mentioned. Such collaboration could have been particularly valuable in supporting feedback loops based on independent analysis and assessments of institutional performance. Moreover, these stakeholders could have contributed meaningfully to the design of monitoring tools and mechanisms. The absence of formal platforms or coordination mechanisms limited their ability to engage in monitoring and follow-up. It was reported to the Evaluation Team, however, that non-governmental actors were involved in specific task forces, most notably in the compliance of the legal framework including in conducting the self-assessment exercise of the UNCAC and in the last 2 years in the establishment of the working group on youth, gender lens in anti-corruption and private sector engagement. While this reflects a degree of operational inclusion, it remains ad hoc and does not substitute for structured process to engage with non-governmental actors on a regular basis. To reinforce inclusivity and shared ownership, future iterations of the Strategy should consider reactivating multi-stakeholder participation within the Committees of the NACS. This could take the form of formal roles within structured dialogue platforms convened on a regular basis, with a clear agenda and a documented process. Such integration would strengthen transparency, accountability, and sustained engagement across sectors.

Recommendations

Strategic alignment and planning	• **Strengthen integration with economic and development priorities, national and sectoral planning in order** to reinforce coherence and long-term impact, it is recommended to strengthen the integration of the updated anti-corruption strategy with future national reform framework, future public administration reform agenda and sectoral planning frameworks. Developing a national development or vision document remains essential to anchor strategic frameworks – such as the NACS – within broader operational plans and budgetary processes. This would enable more effective prioritization, resource allocation, and institutional commitment across sectors. Targeted training and support should be provided to public institutions to build strategic planning capacities, ensuring they acquire the necessary competencies to contribute meaningfully to both the development and execution of the strategy.
Risk management and adaptive implementation	• **Embed structured risk analysis and mitigation mechanisms** within the follow-up mechanism and implementation plan of an updated Strategy. This will enhance its relevance and responsiveness, enabling institutions to proactively navigate uncertainties and adapt to Lebanon's volatile context.
Follow up mechanism of the NACS	• **Recentre the follow-up mechanism of the NACS around the strategic outcomes and annual work planning** to enhance coordination among responsible entities working toward common results. This outcome-based approach would improve information exchange, collaboration, and result measurement. This would also encourage stakeholders to engage not only in the implementation of their respective initiatives but also in the broader strategic framework, fostering a more integrated and coherent approach to anti-corruption reform. In this context, a Monitoring and Evaluation Team should be formally established and empowered to play a cross-cutting role in tracking progress across outcomes, facilitating data collection, and supporting evidence-based decision-making. Annual work plans should be developed in line with the NACS objectives and serve as operational tools to translate strategic priorities into actionable activities, timelines, and adequate resource allocations.

Follow up mechanism of the NACS	• **Strengthen institutional continuity and knowledge transfer mechanisms** in order to ensure strategic coherence and preserve institutional memory. As such, the Technical Committee could develop Terms of Reference of committee members to clarify their roles and responsibilities and establish a formalized induction and handover protocol for newly appointed members. This should include: i) a concise briefing package summarizing previous meetings, key decisions, implementation challenges, and unresolved issues; ii) access to relevant documentation, including meeting minutes, progress reports, and strategic updates; iii) a designated focal point or secretariat tasked with maintaining continuity and facilitating onboarding. Additionally, the Committee should consider activating the fixed meeting schedule aligned with its original mandate (e.g., quarterly sessions), to reinforce regular oversight and enable timely decision-making. Stabilizing representation and improving knowledge transfer will enhance the Committee's responsiveness and its ability to guide the strategy's implementation effectively.
	• **Institutionalize regular and structured collaboration with non-governmental stakeholders – including civil society organizations, private sector actors, academia, and media – within the governance framework of the NACS.** This could be achieved through formal structured dialogue convened on a regular basis, with clear agendas and a documented process, as originally mandated by the decision establishing the Ministerial and Technical Committees**.** Future iterations of the Strategy should establish clear modalities for stakeholder engagement, to inform strategic direction and policy coherence, assigning roles in M&E processes, such as contributing to progress reviews, risk assessments, and validation of findings.

2.2 Effectiveness and efficiency

Achievements and areas for improvements in implementing the NACS

17. **Achievements and results attained with the NACS have been systematically documented and transparently shared nonetheless; the current monitoring framework could be further strengthened to present progress achieved with further clarity and better highlight the challenges encountered.** In fact, the monitoring of achievements under the NACS 2020 was conducted within the framework of developing two annual progress reports[13], which involved structured steps to compile and assess implementation data. In the given context, these reports represent an achievement in itself an important exercise in transparency and results-based monitoring, especially as they are publicly accessible and contribute to broader accountability efforts. While the strategy does not yet include a formal monitoring plan with outcome-level performance indicators, the reports nonetheless offer a valuable form of appraisal, complemented by qualitative narratives on achievements. The inclusion of a color-coded assessment[14] - as an alternative to progress indicators- adds a visual dimension to progress tracking, though the methodology and criteria behind the coding have not been fully clarified. Consultations indicated that some government and non-governmental actors experienced challenges in interpreting the color codes consistently, which may have limited the system's effectiveness leaving room for varied interpretations. Enhancing clarity around the assessment approach could further strengthen stakeholder engagement and reinforce confidence in the reporting framework. In addition, while the annual progress reports offer useful insights into implementation status, they do not systematically provide analysis on the challenges encountered or the lessons learned throughout the process. This limits opportunities for reflection and adaptive learning, both of which are essential for refining strategic approaches and strengthening institutional responses. Include narrative analysis on challenges and lessons learned could further support in contextualizing the color coding. Integrating such analysis into future reporting cycles could enhance the value of the reports as tools for continuous improvement, while also fostering a more open and constructive dialogue among stakeholders. Furthermore, carrying out a mid-term evaluation would have further enhanced this learning process. Such an exercise could have provided decision-making bodies – the Ministerial and Technical – with timely insights into the progress and challenges of the NACS, enabling them identify areas requiring adjustments or interventions, and support evidence-based steering and the adoption of corrective measures.

18. **Up to 2024 the NACS demonstrated a limited level of implementation across all seven outcomes**. Analysis of the annual progress reports indicates that, as of March 2024, the implementation NACS reflected a limited level of advancement. All seven strategic outcomes were assessed within the yellow to red range of the color-coded system, suggesting that while certain foundational steps had been initiated, substantial progress remained limited across key areas. The narrative pointing out to partial implementation, with several outputs delayed. The reports provide a useful snapshot of progress,

13- First Progress Report on the Implementation of the National Anti-Corruption Strategy May 2020 – September 2021 https://omsar.gov.lb/NACS_First-Progress-Report_Final and Second Progress Report on the Implementation of the National Anti-Corruption Strategy October 2021 – March 2024. https://omsar.gov.lb/NACS_Second-Progress-Report_Final

14- The color coding used in the annual reports on the implementation of the strategy is interpreted as follows: the 2 shades of green: Fully Achieved or On Track, indicating that the outcome or output has been completed or is progressing as planned; Yellow: Partially Achieved or Delayed, meaning some progress has been made but there are delays or partial implementation; Orange: very limited progress has been achieved the outcome/outputs has been initiated but lacks sufficient progress or clarity to determine its trajectory; Red: Not Achieved or Off Track, signifying that the outcome/outputs has not started or is significantly behind schedule.

clarifying the assessment criteria (using percentage for instance) and linking them more explicitly to measurable indicators could enhance the clarity and utility of the annual reports to supporting more targeted follow-up actions. Moreover, developing progress reports every six months – as initially planned in the strategy document – could further support responsible parties in understanding progress made, identifying challenges, and adjusting implementation efforts in a timely and coordinated manner.

19. **The NACS 2020-2025 served to effectively lay the groundwork for foundational steps to update and harmonize the legal and institutional anti-corruption framework and served as a platform for collaboration and coordination among key institutions, political actors and non-government actors in this regard.** These efforts were carried out within the scope of its first strategic outcome: "Specialized Anti-Corruption Legislation Completed in Accordance with International Standards and Better Implemented. This outcome is composed of **7 outputs** related to the establishment of the National Anti-Corruption Commission and update or enactment of anti-corruption laws on illicit enrichment, whistleblower protection, management of conflict of interest, access to information, asset recovery and periodic review of the anti-corruption legislative framework[15]. The Second annual report on the implementation of the NACS[16] showed that there is **moderate and uneven progress** in the implementation of the 7 outputs of this outcome with foundational steps initiated across all outputs, but none have reached full implementation or maturity. Among the outputs under Outcome 1, the most notable progress has been observed in three areas: the establishment of the National Anti-Corruption Commission (Output 1.1), the effective application of the Law on the Right of Access to Information (Output 1.5), and review of specialized anti-corruption legislation (Output 1.7). Four dedicated task forces were established to advance the outputs under this outcome, each focusing on a strategic priority: the Harmonization of Anti-Corruption Laws (launched in 2020 and extended in 2022), the Effective Implementation of the Whistleblower Law (2020), the Implementation of the Access to Information Law (2020), and the Establishment of the National Anti-Corruption Commission (2020). This approach demonstrated a strong commitment to translating strategic objectives into actionable reforms, while fostering institutional ownership and cross-sectoral collaboration around key reforms of the NACS.

    One of the most significant achievements during the reporting period was the formal establishment and phased activation of the National Anti-Corruption Commission (NACC), which was officially established first under the framework of Law No. 175/2020 Combating Corruption in the public sector and establishing the National Anti-Corruption Commission (NACC)[17]. Its members were then appointed under Decree No. 8742 dated 28/01/2022[18], and its members began their work after taking the legal oath in February 2022.

    The establishment of the National Anti-Corruption Commission (NACC) marked a pivotal institutional reform however its effective operationalization faced significant delays related to the approval of its by-laws and initiating recruitment competitions

15- Full titles of the outputs are as follows: 1.1 A National Anti-Corruption Institution established and activated, 1.2 An updated and effective system for combating illicit enrichment established and implemented, 1.3 Whistleblowers' Protection Law effectively implemented, 1.4 An effective conflict of interest management system established and implemented, 1.5 The Right of Access to Information Law effectively implemented, 1.6 An effective system for recovering stolen public assets established and implemented, 1.7 Specialized anti-corruption legislation and their effectiveness periodically assessed and reviewed.
16- Second Report on the Implementation of the National Anti-Corruption Strategy October 2021 – March 2024. Page 16
17- Law-on-Fighting-Corruption-in-the-Public-Sector-and-the-Establishment-of-the-National-Anti-Corruption-Commission-175-Year-2020-1.pdf
18-Decree No. 8742 dated 28 January 2022, http://77.42.251.205/Law.aspx?lawId=289159

for its staff. While fully aligned with constitutional principles, its senior officials were appointed outside the customary confessional power-sharing framework, through an electoral process led by senior judges from the judicial, administrative, and financial courts. This approach represents a distinctive effort to safeguard the independence and legitimacy of public institutions within the Lebanese context. Since 2022, the NACS has started delivering on its core mandates including the management of asset and interest disclosures (it received in 2024 a total number of 19,741 disclosures[19]) , the promotion of legal accountability for illicit enrichment, the monitoring of compliance with the right to access information Law (and published in 2023 an annual report[20] highlighting in particular the major obstacles hindering individuals' access to information), promoting a culture of integrity in society including in higher education and the initiation of regional cooperation while finalising the adoption of its internal governance framework, procedures and integrity standards in early 2024 as highlighted in its annual reports[21]. These efforts were pursued in the absence of a fully operational staffing framework, necessitating reliance on volunteers and support from international development partners to bridge the gap. Looking ahead, this situation may affect the NACC's implementation capacity, continuity, and institutional outreach. Despite the valuable efforts undertaken by the NACC, there remains a notable lack of performance indicators to systematically assess its impact – particularly in the areas of corruption detection and investigation. While the Commission has advanced key mandates and initiated awareness campaigns, the absence of measurable benchmarks and outcome-based metrics limits the ability to evaluate its effectiveness, monitor progress, and identify areas for improvement. In terms of scope of its mandate as well the NACC would need to cover the current gaps related to corruption in the private sector. The evaluation team was however informed that the NACC is considering expanding its mandate to include the private sector, as part of a broader legal reform aimed at addressing corruption beyond the public sector. In fact, the current legislative framework presents notable gaps in areas related to private sector corruption such as corporate liability and whistleblower protection within the private sector. Addressing these shortcomings is essential to ensure alignment with international standards and to promote a more comprehensive anti-corruption approach.

20. **In terms of legislative outputs related to anti-corruption, there has been notable achievements, particularly with the adoption of key laws and amendments that strengthen Lebanon's legal framework in line with international standards.** Since 2011, the development of Lebanon's national anti-corruption strategy has catalyzed a process of shared understanding around the legal reforms required to combat corruption effectively. This collaborative momentum led to the adoption of several key laws even before the strategy was formally endorsed—underscoring that these achievements are not isolated, but rather traceable to the groundwork laid during the strategy's development phase. These legislative instruments now stand as foundational pillars in Lebanon's anti-corruption architecture. They reflect meaningful progress toward harmonizing national efforts with international and regional commitments and demonstrate that strategic dialogue can yield tangible institutional outcomes even ahead of formal policy adoption. These include:

19- Distributed as follows: 2,367 members of municipal and elective councils, 16,749 administration employees, 625 Judges. 2024 NACS Annual report, NACC-Third-Annual-Report-year-2024.pdf
20- https://www.nacc.gov.lb/First-Annual-Report-on-the-Level-of-Implementation-of-the-Right-of-Access-to-Information-Law.pdf
21- https://nacc.gov.lb/commission-documents-new/?commission_document=annual-reports

- **The Asset and Interest Disclosure and Illicit Enrichment Law (Law No. 189/2020).**[22] One of the key achievements of Law No. 189/2020 lies in its establishment of a legal framework that enables the prosecution of corruption based on illicit enrichment grounds. The law has reportedly led to a number of prosecutorial actions, including investigations initiated by the National Anti-Corruption Commission and judicial authorities. A critical feature of Law No. 189/2020 is its requirement for public officials to submit asset and interest declarations, thereby laying the groundwork for detecting illicit enrichment. However, this mechanism could be significantly enhanced by publicly disclosing the list of officials who have failed to comply or provided incorrect information which might require introducing legislative amendments to the law 189/2020 accordingly, and by equipping the National Anti-Corruption Commission (NACC) with the authority and resources to investigate discrepancies. Publicizing non-compliance would not only reinforce transparency but also empower civil society and media actors to hold officials accountable. Strengthening the NACC's auditing expertise of disclosure would further empower it to effectively leverage asset declarations as a tool for accountability. An important feature of the Law is that it includes declaration of interest (Article 2) that generate income or not but that could pose a risk of bias and impartiality.

- **The Access to Information Law (Law No. 28/2017) and amendments by Law No. 233/2021[23] and its implementing decree No. 6940/2020**[24]. This law stands out as a key achievement under the NACS 2020–2025. Its implementation has yielded promising results, particularly in institutional uptake. According to the 2023 first Annual Report on Implementation[25], more than half of the 190 institutions surveyed[26] - and 75 percent of local administrations – did not appoint a dedicated information officer. Furthermore, 76 percent of these entities reported responding to the information requests they received. While the overall volume of requests remains limited (only 44 percent of survey institutions mentioned receiving a request for information), these figures reflect growing institutional responsiveness. Nonetheless, important gaps persist, notably, in the interpretation of the law by public administration and, more widely, in public awareness, which remains low. The publication of mandatory information (i.e. key administrative documents such as decrees, decisions, instructions, circulars, annual reports and financial operations beyond 50 million Lebanese Lira as per Chapter 2 of the Law) remains limited, with 38 percent of national-level administrations and 41 percent of local administrations reporting that they do not publish this information. Gaps also remain in the proactive sharing of additional information (e.g. budgets, procurement, staffing) across all public entities. The lack of digital infrastructure and functional websites across many public administrations has hindered the effective sharing of information. Sustained efforts are needed to institutionalize disclosure practices, enhance citizen engagement, and reinforce the law's role as a cornerstone of participatory governance. While Lebanon has adopted a National Digital Transformation Strategy 2020-2030[27] which aimed amongst other to bolster the public sector digitalization, however progress in implementation re-

22- Assets-and-InterestsDeclaration,and-thePunishment-of-illicitEnrichment-Law-189-16/10/2020.pdf
23- Law-No.-28-10/2/2017-amended-by-Law-No.-233-dated-16/7/2021.pdf
24- nacc.gov.lb/wp-content/uploads/2023/11/Reg-6940_2020.pdf
25- NACC, First Annual Report on the Implementation of the Right to Access Information Law (2023), nacc.gov.lb/First-Annual-Report-on-the-Level-of-Implementation-of-the-Right-of-Access-to-Information-Law.pdf
26- Which constitutes 61% of the targeted institutions.
27- https://omsar.gov.lb/DT-NationalStrategy-2022

mains limited due to lack of human and financial resources. It is important to note that the State Council has enabled litigants to invoke the provisions of the above-mentioned law by declaring its jurisdiction to examine appeals submitted before it challenging decisions that refuse to provide the requested documents or information, even before the establishment of the independent administrative body referred to in Article 19 of this law which is the National Anti-Corruption Commission (NACC).

Implementation of the Access to Information Law

Source: First Annual Report on the Implementation of the Access to Information Law (2023)

50%+

of all 190 institutions surveyed have not appointed a dedicated information officer

75%

of local administrations have not appointed a dedicated information officer

76%

of institutions responded to the requests they received (despite the limited volume of requests)

38%

of national-level administrations do not publish mandatory information required under the Access to Information Law (i.e. key administrative documents such as decrees, decisions, instructions, circulars, etc..)

41%

of local administrations do not publish mandatory information required under the Access to Information Law (i.e. key administrative documents such as decrees, decisions, instructions, circulars, etc..)

It has played a pivotal role in reinforcing the application of the Access to Information Law through its decisions. In several rulings[28], the Council has affirmed the binding nature of the Law and clarified the obligations of public administrations to disclose information upon request. These decisions have helped operationalize the law by setting legal precedents that compel compliance, particularly in cases where institutions failed to respond or unjustifiably withheld information. Such jurisprudence strengthens the normative framework and provides citizens and civil society actors with legal recourse, thereby enhancing the enforceability of transparency standards. Furthermore, with regard to the law's obligation requiring public administrations to publish their annual reports, it is worth noting that the State Council was among the first institutions to comply with this requirement by making its report publicly available on its official website. After the establishment of the NACC, the review of decisions rejecting requests for access to information – whether explicit or implicit – became part of its mandate, whereby it examines such cases, investigates them, and issues the appropriate decisions. In accordance with Law No. 175/2020 on combating corruption in the public sector and establishing the NACC, and in line with the provisions of the Access to Information Law No. 28/2017 and its amendments, the NACC began exercising its monitoring role over the implementation of this law by issuing a series of decisions and circulars related to receiving complaints, reviews, and appeals concerning its application. In this context, the NACC responsibilities include examining explicit or implicit administrative refusals to provide information, investigating them, and issuing binding decisions within the legal deadlines; providing advice to the competent authorities on any matter related to the application of the law; preparing an annual report highlighting the main obstacles that hinder individuals' access to information, in addition to special reports when necessary, which are published electronically on the NACC official website; and contributing to public awareness on the importance of the right of access to information and how to exercise it, as well as training public officials and administrators on enabling individuals to obtain information and promoting a culture of transparency. These efforts demonstrate that the NACC has come to play a central role in ensuring that public administrations comply with their legal obligations regarding transparency and in strengthening citizens' trust in public institutions.

- **The Whistleblower Protection Law[29] (Law No. 83 dated 10 October 2018), further reinforced by the amended Law No. 182 dated 12 June 2022**. This Law represents an important step by defining legal safeguards for individuals reporting wrongdoing. However, its operationalization remains limited. The Whistleblower Protection Office (WBPO) was initially established and managed by the General Prosecutor prior to the appointment of the NACC, pursuant to the amended legal framework. Once the NACC was established, whistleblowers have multiple channels for submitting disclosures and protection requests – either directly to the NACC, via the centralized WBPO, or through regional public prosecution offices. Despite this institutional setup, two principal challenges remain. First, coordination mechanisms between

28- Decision No. 179 / 2020–2021, dated 30 March 2021.
- Decision No. 387 / 2021–2022, dated 6 April 2022.
- Summary Proceedings (Judge Carl Irani), Decision No. 69 / 2023–2024, dated 14 November 2023.
- Summary Proceedings (Judge Carl Irani), Decision No. 627 / 2022–2023, dated 24 July 2023.
- Summary Proceedings (Judge Nicolas El Tabet), Decision No. 628 / 2022–2023, dated 24 July 2023.

29- Law-No.-83-dated-10/10/2018-amended-by-Law-No.-182-dated-12/6/2020.pdf the NACC, Public Prosecution, competent security authorities, and the Civil Service Board (CSB) require significant strengthening to ensure effective physical protection and safeguards against professional retaliation for whistleblowers. Given its mandate over public sector personnel management, the CSB is well-positioned to support the enforcement of professional safeguards against retaliation. Establishing formal protocols between the NACC and the Civil Service Board could enable timely intervention in cases of workplace reprisal, ensure the preservation of whistleblower confidentiality, and facilitate the reassignment or protection of vulnerable staff. Such coordination would also reinforce institutional accountability and help embed a culture of integrity within the public administration. Second, the Whistleblower Protection Framework has yet to be fully operationalized at both the NACC and WBPO levels. This includes finalizing standard operating procedures (SOPs) and establishing secure, accessible reporting channels such as hotlines, encrypted email systems, and online portals. According to research by Transparency International Lebanon and the Lebanese Centre for Policy Studies[30] confirms that uptake has been minimal, largely due to fear of reprisal and low trust in institutional safeguards. In fact, WBPO remains inactive and lacks public contact channels, such as a hotline or official website therefore providing a secure and safe entry point to receive and process complaints confidentially remains limited. Furthermore, the physical protection measures are not defined with sufficient specificity, nor are the modalities for guaranteeing their implementation clearly articulated. In addition, as mentioned both the NACC and Public Prosecution may receive whistleblower disclosures, yet there is no codified mechanism to coordinate approaches between both institutions.

- **Consistent efforts have been made to review legislation to ensure its alignment with international standards**, notably through the work of the dedicated task force and in accordance with review mechanisms under international conventions such as the United Nations Convention against Corruption (UNCAC), involving CSOs in its work. However, these efforts have not extended to the establishment and activation of a mechanism for Regulatory Impact Assessment from an anti-corruption perspective. Nor has a system been put in place to assess corruption risks in legislative proposals, draft laws, or existing legislation. This gap limits the ability to anticipate and mitigate corruption vulnerabilities embedded in legal frameworks and undermines the preventive dimension of legislative reform.
- Several other key pieces of legislation have been adopted in the area of anti-corruption. While they may not be directly attributed to the National Anti-Corruption Strategy (NACS) 2020-2025, they were considered within the broader process and structured dialogue initiated around the Strategy. Notably, this includes **Law No. 306 (2022), which amended the 1956 Banking Secrecy Law, and Law No. 84 (2018) on Enhancing Transparency in the Petroleum Sector.**

21. In terms of **remaining gaps under this outcome**, two critical systems have yet to be effectively established and implemented. First, despite efforts to address the issue of conflict of interest in public procurement, no comprehensive policy has yet been established in this regard. It is worth noting that the Public Procurement Authority places great importance on the issue of conflict of interest in its oversight and guid-

30- **Strengthening Whistleblower Protection:** A Key to Accountability in Lebanon ance work, and it has recently issued a Code of Professional Conduct for individuals working in public procurement within procuring entities and their contractors alike. Nevertheless, the absence of a **comprehensive system for managing conflicts of interest (Output 1.4)** continues to undermine institutional integrity. While certain issues – such as the **prohibition of gift acceptance** (Penal Code Articles 351 and 352) and **restrictions on transitioning from public office to private entities** (Civil Servant Statute, Decree No. 112/1959, Articles 98 and 100) and conflict of interest in procurement , are addressed within the legal framework, **no formal mechanisms** have been adopted to systematically **identify, prevent, or sanction conflicts of interest** across public entities. Although **interest disclosures** are nominally included within **financial and asset declarations**, they remain insufficiently regulated and inconsistently enforced. As such, the **Court of Accounts** and the **Central Inspection Bureau** do not include the **detection of conflicts of interest** as part of their oversight controls. Similarly, the **National Anti-Corruption Commission (NACC)** does not currently have a specific mandate or operational role in this regard. Second, despite the adoption of Law No. 214 dated 08 April 2021 on the Recovery of Stolen Public Assets and Crimes of Corruption[31], **an effective system for asset recovery remains unimplemented**. The law provides for the establishment of a dedicated recovery unit within the NACC to manage and a National Fund for the Management and Investment of Assets under Recovery or Recovered Related to Crimes and Proceeds to manage recovered assets during the freezing or seizure phase. However, as of 2025, both structures remain inactive, and no operational framework has been put in place to trace, freeze, or repatriate illicitly acquired fund. In addition, certain provisions of Law No. 175/2020 require to be further harmonised with the requirements and conditions of the United Nations Convention against Corruption, particularly with regard to the independence of the NACC.

22. In addition, although not explicitly addressed within the outputs of the NACS 2020–2025 framework, **the link between anti-corruption efforts and anti-money laundering remains limited**. The Middle East and North Africa Financial Action Task Force (MENA-FATF) 2023 Mutual Evaluation Report on Lebanon's AML/CFT measures[32] underscores a critical gap: Lebanon lacks a comprehensive understanding of money laundering and terrorist financing risks associated with corruption at senior levels of government. This includes insufficient analysis of politically exposed persons (PEPs), weak integration of corruption-related risks into financial intelligence processes, and the underutilization of parallel financial investigations. Such deficiencies in strategic analysis hinder the country's ability to design targeted mitigation measures, particularly in sectors prone to abuse of power, illicit enrichment, and political interference. In the absence of a robust, risk-based approach that explicitly addresses high-level corruption, Lebanon's anti-money laundering framework remains fragmented and reactive, rather than preventive.

23. **Overall, Lebanon's anti-corruption efforts have largely relied on a legalistic approach, with limited emphasis on proactive policymaking**. While the adoption of laws such as those on asset disclosure and illicit enrichment represents important progress, the absence of a broader policy framework has hindered strategic coherence and institutional uptake. This is particularly evident in the area of conflict-of-interest

31- Recovery-of-Assets-Derived-from-Corruption-Crimes Law.pdf
32- https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-mer/MENAFATF-MER-Lebanon-2023.pdf.coredownload.inline.pdf

management, where the lack of a dedicated policy has delayed the development of preventive mechanisms, training protocols, and sector-specific guidelines. On the one hand, a legalistic approach ensures formal compliance and legal clarity; on the other, it risks becoming static and reactive, failing to adapt to evolving governance challenges or promote behavioural change. A more policy-driven strategy could have accelerated the creation of tailored tools, fostered inter-agency coordination, and embedded integrity standards across public institutions – ultimately strengthening Lebanon's capacity to prevent corruption rather than only respond to it.

24. **The NACS 2020-2025 did not generate sufficient momentum to deliver notable institutionalized results to promote integrity in institutional culture of the civil service.** Work in this areas within the scope of Outcome 2 on 'Higher Levels of Integrity of Public Function Achieved', composed of **4 outputs**[33] focusing on clearly defining roles and responsibilities of public officials, ensuring standards of transparency and merit applied in appointment, transfer, promotion, compensation and fringe benefits of public officials, promoting ethical behaviour in public administrations, institutions, and municipalities and supporting the effectiveness and independence of the Civil Service Board. The Second annual report on the implementation of the NACS[34] showed very limited progress in the implementation of the 4 outputs of this outcome. Most of the associated outputs were rated between orange and red on the performance scale. This indicates either partial implementation with significant delays or critical gaps in execution.

    Progress includes the completion of a comprehensive census of public employees, which provides a foundational dataset on employment and detected unlawful contractual arrangements paving the way for a more comprehensive civil service restructuring. While the evaluation team was informed of the existence and overarching mandate of the Interministerial Committee for Administrative Reform led by the Deputy Prime Minister - namely, to enhance the efficiency, transparency, and effectiveness of Lebanon's public administration -no information could be retrieved regarding its specific decisions or timeline for a comprehensive civil service restructuring. At the time of the review, Lebanon had just launched a landmark initiative entitled "Reinventing Government 2030". Coordinated by OMSAR, this initiative seeks to modernize state institutions, rebuild trust between the state and its citizens, and lay the foundations for a new social contract rooted in transparency, innovation, and digital transformation. While still in its early stages, the initiative could be an opportunity to initiate a bold shift in Lebanon's administrative reform trajectory, offering a strategic framework to address longstanding inefficiencies and governance gaps through a forward-looking, citizen-centric approach. In Lebanon, civil service reform is jointly shaped by the mandates of the OMSAR and the CSB, though coordination between them remains limited and often fragmented. OMSAR leads on strategic planning, administrative modernization, including digital transformation and anti-corruption frameworks. It has spearheaded projects to strengthen human resource capacities in the civil service, develop performance appraisal systems, and promote merit-based recruitment. Meanwhile, the CSB holds formal authority over recruitment, classification, and career progres-

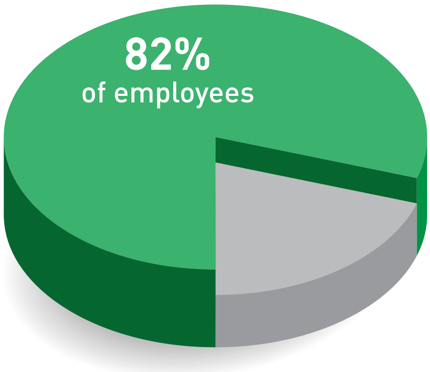
33- The exact titles of outputs are as follows: 2.1 Roles and responsibilities of public officials clearly defined within a modern structure of the overall public sector, 2.3 Standards of transparency and merit applied and respected in the appointment of employees/interns/volunteers, and their transfer, promotion, compensation and fringe benefits, 2.3 A modern and integrated system to promote ethical behavior in public administrations, institutions, and municipalities established and implemented , 2.4 Independence and effectiveness of the Civil Service Board enhanced.

34- Second Report on the Implementation of the National Anti-Corruption Strategy October 2021 – March 2024. Page 22 sion within the public sector. It is responsible for enforcing civil service laws, managing examinations, and overseeing personnel files. Despite overlapping objectives, the lack of a unified reform framework has led to duplicated efforts and blurred institutional roles, particularly in areas such as job standardization, ethics enforcement, and performance evaluation. **Strengthening coordination between OMSAR and CSB is essential to ensure coherent, integrity-driven civil service reform.**

In 2020, the Lebanese Parliament passed Law No. 7 to **formalize a mechanism for appointing senior officials in the public administration and institutions**. However, the law was annulled by the Constitutional Council following a constitutional review initiated by President of the Republic. This legal setback temporarily stalled efforts to institutionalize merit-based appointments. Nonetheless, in 2025, the Council of Ministers issued Decision No. 32, reactivating and amending the mechanism coordinated by OMSAR, the CSB, in collaboration with relevant ministries to reinforce transparency and meritocracy in senior public sector recruitment. The decision was accompanied by a detailed report documenting the number of positions announced and filled and confirming that standardized criteria were applied with precision and transparency. These developments reflect a renewed commitment to integrity in public employment. A survey conducted in 2021[35], revealed that 82 percent of civil servants did not believe promotions were based on merit, with nearly 39 percent attributing advancement to nepotism. Additionally, 46 percent of respondents indicated that they either lacked, or were unaware of, a code of conduct or employee handbook within their administration. Among the 208 respondents familiar with formal complaint mechanisms, approximately 40 percent stated they would never use them, even in cases of mistreatment or discrimination – underscoring a deep mistrust in institutional safeguards. This sentiment was further echoed by the 55 percent who said they would not file a complaint with the Central Inspection. While the evaluation did not benefit from an updated civil servant survey, consultations clearly revealed widespread distrust – among both public officials and non-governmental actors – toward merit-based recruitment, complaint mechanisms, and integrity standards in the administration. These findings point to an urgent need for systemic reform and confidence-building measures.

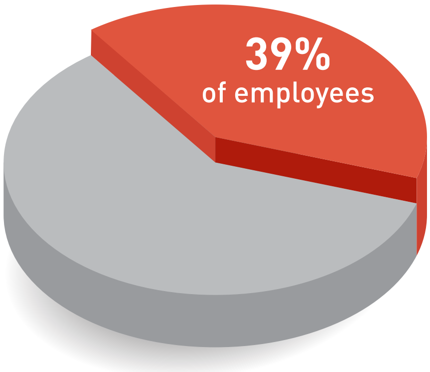
35- Youth4Governance, Phase II – civil servants' perception of the public administration, https://www.youth4governance.org/wp-content/uploads/2021/09/Public_Administration_Presentation.pdf

Believe promotions are not based on merit and competence



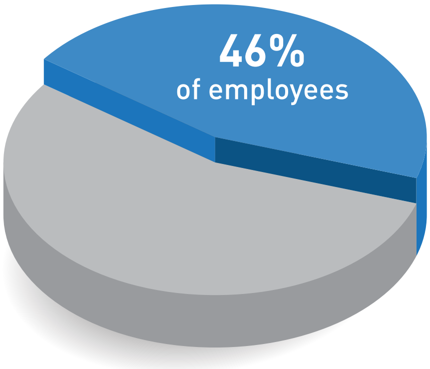
82% of public sector employees do not believe that promotions are awarded fairly based on competence

Attribute advancement in public employment to nepotism



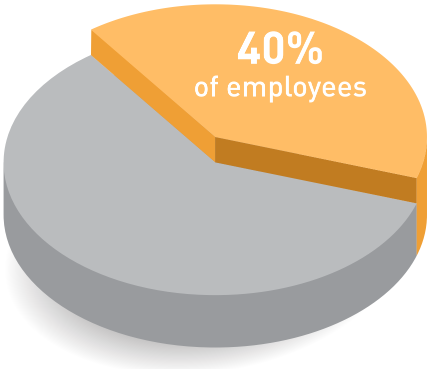
39% explicitly attribute advancement to nepotism, reflecting an entrenched institutional culture

Did not have a code of conduct within their administration or unaware of its existence



46% either lacked or were unaware of a code of conduct within their administration

Would never file formal complaints even in cases of discrimination



40% would not file formal complaints, revealing widespread distrust in institutional oversight

55%

Would not file a complaint with the Central Inspection Bureau

55% indicated they are unwilling to submit a complaint to the Central Inspection Bureau, reflecting widespread distrust in complaint mechanisms in the Lebanese public sector

25. **Despite the strategic emphasis on promoting integrity within public institutions, several critical gaps persist that undermine progress under Outcome 2**. The absence of a fully operational system for evaluating the productivity and performance of public officials – alongside the lack of a consistent reward and accountability framework – limits incentives for ethical conduct and professional excellence. Weak monitoring of compliance with recruitment, promotion, and transfer procedures, particularly for non-permanent civil service positions (contractual workforce), risks perpetuating favouritism and eroding trust in public service. The continued reliance on commissioning without clear criteria across administrations and municipalities further exacerbates opacity in staffing practices. Moreover, the lack of legal provisions regulating the acceptance of gifts and gratuities, and the absence of standardized rules for committee formation and member compensation, leave room for discretionary practices that may conflict with integrity norms. Most notably, the absence of a unified Code of Conduct[36] defining expected behaviours and integrity standards – coupled with insufficient training and enforcement mechanisms – prevents the institutionalization of a shared ethical culture. If left unaddressed, these weaknesses could entrench informal practices, weaken accountability, and hinder the emergence of a merit-based, public administration with high integrity standards. As for strengthening the effectiveness and independence of the CSB, this requires a multi-pronged approach beginning with legislative amendments to its foundational law and the issuance of related regulatory instruments. Such reforms would clarify and reinforce the CSB's mandate, particularly in relation to merit-based recruitment, oversight of public sector appointments, and disciplinary procedures. In parallel, targeted capacity building for CSB personnel - especially in anti-corruption standards, and integrity-based human resource management - is essential to ensure that the institution can fulfil its role credibly and proactively. Enhancing both the legal framework and operational competencies of the CSB would position to lead efforts in promoting integrity in the civil service.

26. **An important insight emerging from the evaluation is that Lebanon's existing training institutions have not yet been fully mobilized within the framework of the NACS and its implementation**. Despite the centrality of integrity promotion in public service reform, the strategy has not effectively mobilized specialized training entities such as the Finance Institute Basil Fuleihan, the National School for Administration (ENA-Lebanon), and the Judicial Studies Institute under the Higher Judicial Council. These institutions possess the mandate and technical capacity to deliver targeted training on ethics, transparency, and accountability across the civil service and judiciary. Their limited integration into NACS programming has resulted in fragmented efforts and missed opportunities to institutionalize integrity standards through structured and continuous learning. To address this gap, the future strategy should prioritize formal partnerships with these institutions, co-develop integrity curricula, and embed mandatory training modules into onboarding, promotion, and continuing education frameworks for public officials at all levels.

36- Several institutions, including the Court of Accounts, the Internal Security Forces, and the National Anti-Corruption Commission, have developed their own internal codes of conduct. The Central Inspection has also prepared a draft code of conduct of its own. However, these individual efforts do not eliminate the need for a unified national code of conduct that clearly defines integrity standards, expected behaviours, and enforcement mechanisms across all components of the public sector. Therefore, a unified framework is necessary to ensure consistency, accountability, and institutional coherence.

27. **The NACS 2020–2025 supported significant coordinated reforms aimed at improving transparency and integrity in public procurement.** These efforts were implemented under Outcome 3 'Public Procurement System Less Vulnerable to Corruption', which comprises **4 outputs**[37] focusing on revising the legal framework, activating the Public Procurement Authority strengthening oversight, control, and auditing mechanisms. Recognizing the high corruption risks associated with procurement, the NACS elevated public procurement to a standalone outcome, signalling a strong commitment to reform in this area. It is important to note that, Lebanon adopted a dedicated Public Procurement Reform Strategy for the period 2022–2024[38], which pursued broader objectives including competitiveness, efficiency, transparency, and integrity. This strategy featured a specific pillar on transparency, with outputs aligned to those of the NACS. The reform process was coordinated by the Institute of Finances Basil Fuleihan (IOB), as stated in Public Procurement Reform Strategy for the period 2022–2024. The Public Procurement Authority then coordinated these reforms after its establishment, noting that it began its duties as of 29/7/2022. However, consultations revealed limited integration of the Institute within the NACS governance structure, despite its strategic role in training and its valuable feedback on implementation challenges. A more structured involvement could have fostered stronger coordination and responsiveness, particularly in addressing practical obstacles to the enforcement of procurement laws and integrity safeguards.

28. **Under the framework of Public Procurement Law (PPL) 244/2021, Lebanon has made notable strides in reforming its procurement system in line with international standards**. Key achievements include the establishment of an independent administrative authority responsible for regulating, monitoring, and overseeing public procurement, providing technical support, and operating the central electronic platform as well as the clear definition of integrity standards, conflict of interest provisions, and penalties for violations across sectors and disclosure of beneficial ownership. The PPA plays a central role in organizing, supervising, and enhancing the quality management of public procurement in coordination with relevant administrations. Its responsibilities include proposing public procurement policies, promoting openness, competition, and transparency – particularly through the management of the central electronic platform. The Authority oversees the collection and publication of annual procurement plans, announcements, and proceedings, and may suspend procedures in cases of inefficiency. It also regulates framework agreements, consolidates procurement data in a central database, maintains a public record of exclusion decisions, and proposes standard documents and templates to guide procurement processes.

29. In practice, **important efforts have been achieved to improve the transparency of public procurement.** Mandatory publication of procurement notices, requirements, and status updates on the PPA website[39] represents a promising step, complemented by increased social accountability through civil society initiatives such as tracking

37- The exact titles of outputs are as follows: 3.1 Centralized and decentralized public procurement more transparent and competitive, 3.2 Clear and effective oversight, control, and auditing mechanisms adopted and implemented at all stages of centralized and decentralized public procurement, 3.3 Tenders Administration better able to reduce corruption in public procurement within its mandate, 3.4 A comprehensive law that fosters public procurement, its oversight and audit as per international standards approved and implemented.
38- Approved by the Council of Ministers on May 20, 2022 (Decision no.66), https://institutdesfinances.gov.lb/sites/default/files/2024-06/Lebanon-PPR-strategy-Final-April22-Approved-by-COM-Eng-1_0.pdf
39- https://www.ppa.gov.lb/ar/tenders?page=1

platforms[40] and awareness guides on the new PPL[41]. However, a 2023–2024 survey[42] conducted by the IOB across 68 procuring entities revealed significant gaps in compliance with the transparency requirements of the PPL[43]. Only 11.8 percent of institutions publish all procurement-related information as mandated, while 13.2 percent publish none. The majority fall in between: 35.3 percent publish only the announcement/invitation to tender, and 29.4 percent publish both the announcement and contract award. Regarding publication channels, 84.1 percent of entities report announcing contracts awarded at least once per year on the PPA website, which is encouraging. However, reliance on other platforms is lower: 63.6 percent use their own websites, 18.2 percent publish in local newspapers, and only 6.8 percent use the Official Gazette. This suggests that while the PPA website is becoming a central hub, many entities still lack consistent practices or awareness regarding comprehensive publication. Further efforts are needed to ensure uniform compliance across all procuring entities. This analysis is corroborated by findings from the civil society Gherbal Initiative[44], which examined a sample of procurement operations and revealed that less than 10 percent of public administrations announced their bids, highlighting a widespread lack of compliance with the publication obligations set forth in Public Procurement Law 244/2021.

Transparency in public procurement: level of information publication

Source: Institute of Finances Basil Fuleihan Survey (2023 – 2024) –
Respondents: 68 entities

13.2%

No information published
no disclosure of any procurement operations

35.3%

Announcement only
publish the tender invitation without the contract award

29.4%

Announcement + contract award
partial publication covering two stages

11.8%

Full publication
meet all transparency requirements under the law

40- The Monaqasa.org, platform was launched to monitor, track, and publish all announced bids. This platform allows all visitors (individuals, small and medium-sized enterprises, oversight bodies, researchers, etc.) to search within the bids and view their statuses; whether still active, awarded, or cancelled, along with the names of the winning bidders, contract values, and other relevant information. https://monaqasa.org/about_monaqasa
41- https://elgherbal.org/reports/Rg4oWYGJwSwwUE7KrqjP
42- Status of Implementation of Lebanon's Public Procurement Law 244/2021 and Assessment of skills' gaps and training needs, Finance and Economic Institute Basel Fuleihan, https://institutdesfinances.gov.lb/sites/default/files/2025-02/2024-Report
43- The Public Procurement Authority is legally the responsible entity authorized to publish data on public procurement, and it is currently in the process of preparing a detailed and documented report on public procurement operations covering the period from 29 July 2022 to 31 December 2024.
44- Gherbal Initiative Report, "Two Years into the Implementation of the Public Procurement Law Monitoring Public Procurement in Lebanese Public Administrations From 01/08/2023 to 01/08/2024", https://elgherbal.org/reports/k25yGh4UO3wU11Fi36zX

30. **The full operationalization of the PPA continues to face challenges**. As of 2025, Board members had not yet been nominated, and staff recruitment was still pending. Efforts have been made to finalize job descriptions for board members and staff, and according to information received by the Evaluation Team, these were expected to be issued in 2025 and would be followed by the launch of the recruitment process. However, persistent challenges remain in establishing procurement units within buying entities, particularly due to the absence of clear job descriptions and competency frameworks. Despite these constraints, the PPA has developed Standard Bidding Documents (SBDs) for consultancy services[45], with additional SBDs for works and goods under development. It has also issued procurement manuals for receiving and tender committees[46] and introduced a model integrity declaration that is now mandatory for suppliers and PPA staff[47]. Misinterpretation of the PPA's advisory role[48] by senior officials has led to procedural delays and resource strain, as ministers and directors general systematically request prior review of tender documents by the regulatory authority highlighting the need to improve awareness raising on the PPL and the role of PPA.

31. **The Complaints Authority – mandated by PPL 244/2021 – has not yet been operationalized, leaving a critical anti-corruption gap in Lebanon's procurement system**. Without a functioning mechanism to receive, assess, and resolve procurement-related grievances, bidders are deprived of a formal channel to challenge irregularities, undermining accountability and enabling impunity. This absence weakens trust in public procurement, discourages fair competition, and obstructs the detection and correction of corrupt practices, particularly in high-risk sectors. Operationalizing the Complaints Authority is therefore essential to safeguard integrity, enforce legal protections, and ensure that procurement processes are subject to independent scrutiny.

32. **Professionalizing public procurement through targeted training of specialized staff within both the PPA and procuring entities** is essential to reducing corruption risks and ensuring the effective implementation of PPL 244/2021. While introductory training has been delivered, it remains insufficient to build the depth of expertise required to navigate complex procedures, uphold integrity standards, and detect irregularities. Without a well-trained procurement workforce, institutional and technical gaps persist, leaving room for misinterpretation, procedural errors, and manipulation. Strengthening capacity across all levels is therefore not just a technical necessity—it is a strategic anti-corruption imperative that empowers institutions to apply the law consistently, resist undue influence, and foster a culture of transparency and accountability.

33. **Progress in institutionalizing judicial integrity under the NACS 2020–2025 has remained limited with key measures facing implementation delays.** These measures were implemented within the scope of Outcome 4 on 'A Judicial System More Impartial and Capable of Fighting corruption' composed of **four outputs** related to judicial independence, integrity of judiciary, transparency in the work of courts, and strengthened capacities for prosecution of corruption[49]. The Second annual report on the implemen-

45- https://www.ppa.gov.lb/ar/listing-pages/committees-guides
46- Ibid.
47- https://www.ppa.gov.lb/ar/listing-pages/templates
48- Stipulated in Article 76-19 of the PPL
49- The exact title so the outputs are as follows: 4.1 Judicial independence Strengthened as per international standards, 4.2 Integrity of the judiciary reinforced to enhance trust in judicial power, 4.3 Work of courts and their departments is more transparent, 4.4 Highest levels of legal, procedural, and technical capacities achieved in the prosecution of corruption crimes.

tation of the NACS[50] showed very limited progress in the implementation of the 4 outputs of this outcome, most of them being rated between orange and red on the performance scale except for the output related to strengthened capacities for prosecution of corruption that is rather on the yellow scale.

34. **Despite reiterated commitments by successive governments and encouraging efforts in terms of policy dialogue, the adoption of a new law for the organisation of the judiciary that would enshrine the structural independence and efficiency of the judicial courts has not yet been achieved**. Justice sector reform has nonetheless remained a consistent priority across national strategies and international cooperation frameworks as mentioned previously (Annex 1). In this context, the launch of the Justice Forum in February 2024 marked a pivotal milestone that created a unified platform for assessing systemic challenges and developing a national roadmap for reform[51]. Efforts to reform Lebanon's three main judicial branches – judicial, administrative, and financial – have gained momentum in recent years. Two separate bills aimed at strengthening the independence of the judicial and administrative courts were developed. **The first, concerning judicial courts**, was voted by Parliament on 31 July 2025 and submitted to the President of the Republic for promulgation. However, on 12 August 2025, President returned the law with a formal request for amendments, citing procedural and substantive concerns that could undermine its enforceability, which has therefore delayed its enactment. The draft law however reportedly introduced provisions aimed at strengthening the independence of the High Judicial Council, notably through revised election processes for its members and enhanced integrity safeguards, including cooling-off periods. It also established transparent procedures for the appointment and renewal of judges and reinforced the role of the Judicial Inspection Authority in monitoring performance and complaints. As for the bill on the **independence of administrative courts**, it remains in debate in the competent parliamentary committee and has yet to be debated and voted by Parliament. Meanwhile, the proposed revision of the law governing financial courts – namely, the Court of Accounts Law – has not yet been completed in committees and not yet submitted to Parliament, despite its strategic importance in reinforcing oversight and accountability mechanisms. Advancing a comprehensive legal framework that guarantees judicial independence, integrity and effectiveness remains a cornerstone for meaningful anti-corruption reform and the broader rule of law agenda. On 30 July 2025, the Higher Judicial Council approved a sweeping judicial reshuffle involving 524 judges across various judicial posts. These appointments were the result of two months of intensive deliberations and were reached by consensus among Council members, reportedly free from political interference. The reshuffle was formally referred to the Ministers of Justice, Finance and Defence, the Prime Minister and President of the Republic to be promulgated by decree in accordance with legal procedures. The newly appointed judges assumed their posts at the start of the judicial year on 16 September 2025. The Council also adopted short-term oversight measures to monitor the performance of newly assigned judges. These steps reflect a commitment to strengthening judicial accountability and restor-

50- Second Report on the Implementation of the National Anti-Corruption Strategy October 2021 – March 2024. Page 22

51- On 29 February 2024, Lebanon marked a pivotal milestone in its justice sector reform with the launch of the Justice Forum, jointly initiated by the Minister of Justice, the Presidents of the Higher Judicial Council the State Council, and the President of Parliament's Administration and Justice Commission. Supported by UNDP and the EU, the Forum aims to develop a national roadmap through inclusive thematic groups, addressing core challenges such as judicial independence, institutional effectiveness, and public trust. Senior officials emphasized the need for comprehensive legislation, independent judges, and adequate resources, while international partners reaffirmed their support contingent on Lebanon's commitment to reform. The Forum reflects a collective recognition of the urgency to strengthen justice delivery and uphold the rule of law in Lebanon. https://www.lebanon3rf.org/justice-forum ing public confidence in Lebanon's justice institutions. Nonetheless, the weakness of the binding legal framework enshrining judicial independence remains a critical gap in Lebanon's anti-corruption architecture. Furthermore, the evaluation team was unable to obtain any substantive information regarding the criteria used for judicial appointments or the mechanisms in place for performance evaluation. While ethical principles for the judiciary are understood to exist, there was no clear evidence presented to the Evaluation team of a formally adopted or consistently applied code of conduct and associated trainings. This limitation constrained the team's ability to assess the extent to which merit-based selection and accountability frameworks are being effectively applied. Furthermore, although the issuance and publication of annual judicial activity reports was foreseen in the NACS, and mandated by the Access to Information Law, the absence of such reporting has hindered public visibility into the judiciary's performance and operations. This gap highlights the pressing need to institutionalize practices that foster transparency, strengthen accountability, and rebuild trust in justice institutions.

35. **Reform measures aimed at enhancing the performance and transparency of courts and affiliated judicial administrations have fallen short of achieving tangible results, despite being formally included in the NACS 2020–2025.** These measures included: establishing a clear and integrated program for scheduling court hearings and reducing delays between them; adopting legal amendments to expedite case resolution through defined timelines; modernizing and regulating forensic medicine systems to ensure diagnostic accountability and improve service quality; creating citizen-facing structures for reception, guidance, and information within courthouses; simplifying procedures and enhancing transparency in the management of the commercial registry; and introducing digital technologies to automate judicial workflows and court operations including digitalize court case management these measures were designed to address challenges related to paper-based management system , length of proceedings, high rate of pending cases, the high number of appeals, and the insufficient number of judges allocated to courts. In July 2023, the Minister of Justice took the initiative to establish a committee tasked with activating the electronic distribution mechanism for judicial files. The committee began its work and achieved some progress in implementing a specific mechanism within the Beirut Execution Bureau[52] , aimed at enhancing transparency in the Court operations. However, the evaluation team did not receive further information regarding the committee's progress or the scope of implementation beyond the Beirut Enforcement Court, which limited the ability to assess its broader impact on transparency and scalability. Furthermore, information tracked by Transparency International Lebanon shows that digitalizing court case management has not started[53]. While these reforms were designed to achieve the overarching output of making the work of courts and their affiliated administrations more transparent their non-implementation continues to hinder institutional efficiency of the judiciary. The absence of progress in these areas also limits the judiciary's contribution to Lebanon's broader anti-corruption efforts, particularly in reducing discretionary practices and ensuring equitable access to justice.

52- Procedural reforms were initiated following the mapping of corruption risks in case enforcement based on a Strategic Corruption Risk Mapping (SCRM) methodology conducted within outcome 7 on preventive measures against corruption (see below).
53- https://thereformshub.org/blog/39

36. **Some promising steps have been taken to enhance Lebanon's legal, procedural, and technical capacities to prosecute corruption cases, in the framework of the NACS, but further efforts are still needed**. During the reporting period, several high-profile corruption cases were brought to prosecution, signalling a degree of institutional responsiveness. This was particularly the case with the significantly increased use of the newly enacted crime of Illicit Enrichment in 2020, also provided for by the NACS. However, in parallel, corruption allegations and high-profile cases also revealed politicization of anti-corruption cases. Legal actions were initiated not only against alleged perpetrators but also against judges involved in pursuing these investigations – raising serious concerns about judicial independence and retaliatory measures, as highlighted by the 2024 Bertelsmann Stiftung's Index (BTI) report for Lebanon [54]. In parallel, the Public Prosecutor at the Court of Cassation executed multiple international judicial requests related to corruption, grounded in the United Nations Convention against Corruption and the principle of reciprocity. A key legislative milestone was the enactment of Law No. 306 in 2022, which amended the 1956 Banking Secrecy Law. This reform reinforced Lebanon's anti-money laundering and anti-corruption framework, improved tax compliance, and addressed financial evasion. Crucially, it authorized judicial authorities, including public prosecutors, tax administrations, the NACC, and the Special Investigation Unit, to lift banking secrecy and access bank accounts under defined conditions. Institutional oversight also advanced, with the State Council[55] (i.e. the administrative court) adopting a more assertive stance on public spending. It affirmed the binding nature of the Court of Accounts decisions and issued a landmark ruling establishing that ministers may be held personally liable on their own assets for mismanagement of public funds. In a further step toward high-level accountability, the Public Prosecutor transmitted files to Parliament in July 2025 received from the Court of Accounts. These files included recommendations to initiate legal proceedings against a sitting Member of Parliament who previously held ministerial office. Subsequently, Parliament convened and formally lifted the Member's immunity, thereby enabling his prosecution, indictment and future trial. In the same session, Parliament also established an ad-hoc investigating committee in alleged corruption of several former ministers of telecommunication. Further specialized training is urgently required to strengthen the capacity of key actors to detect, investigate, and prosecute corruption across Lebanon's institutional landscape in particular for the NACC, oversight bodies such as the Court of Accounts and Central Inspection, and members of the judiciary. Targeted training should cover forensic auditing, financial investigations, asset tracing. It should also address procedural coordination, evidence handling, and cross-border cooperation.

37. **The NACS 2020–2025 allowed to emphasize the importance of oversight bodies within the national anti-corruption architecture, and initial steps were taken to activate their role in combating corruption.** Work in this area was conducted within the scope of Outcome 5 on 'Oversight bodies are more specialized and effective in fighting corruption' composed of **6 outputs** related to the Central Inspection, the Higher Disciplinary Committee, the Court of Accounts, the Ombudsman, internal audit and cooper-

54- 2024 Bertelsmann Stiftung's Index (BTI) report for Lebanon, BTI 2024 Lebanon Country Report: BTI 2024

55- Decision of the Lebanese State Council in a review concerning former Minister Mohammad Safadi (2023): The Council affirmed, in the course of responding to a plea based on Article 70 of the Constitution, that this provision does not preclude accountability before the competent judicial authorities when the act is of a criminal nature or involves a clear violation of financial laws. It further held that the minister bears personal responsibility for any expenditures incurred in contravention of budgetary appropriations or of the law. This position was clearly reflected in a legal analysis of the Council's jurisprudence published by The Legal Agenda. https://legal-agenda.com ation and coordination amongst oversight bodies[56]**.** The Second Annual Report on the Implementation of the NACS[57] showed varied levels of progress in the implementation of the outputs of this outcome. As such, the NACS 2020–2025 identified oversight bodies as central pillars in Lebanon's anti-corruption architecture. While some progress was noted – particularly in enhancing the role of the Central Inspection and the Court of Accounts – most initiatives remain at early or limited stages of implementation.

38. **The Central Inspection has undergone modernization efforts, with its capacity to detect and respond to corruption strengthened through a series of strategic and digital initiatives**. The Central Inspection (CI) developed a strategic plan (2021–2026) aimed at reinforcing its effectiveness including through modernizing the work of the CI and building the capacities of the inspectors to carry out internal audit tasks in accordance with international standards. As such, it has deployed digital tools for oversight such as the IMPACT platform (Inter-Ministerial and Municipal Platform for Assessment Coordination and Tracking) that supervised the COVID related response and DAEM program that aims to financially support vulnerable families in Lebanon and that included features such as a hotline-based complaints centre and a full-scale inspection form to assess vulnerabilities and risks across public administration. These initiatives demonstrated the CI commitment to promoting transparency and accountability across public institutions. The IMPACT Open Data website further reinforces this role by offering public access to data collected through one of Lebanon's most comprehensive national digital surveys, conducted in collaboration with ministries and municipalities. Furthermore, in 2023, the CI started piloting auditing exercises and identified risk matrixes, such as the one conducted at Ftouh Keserwan Governmental Hospital, reflecting efforts to align with international standards and supporting discussion with the Hospital management, and more broadly with the Ministry of Public Health, on necessary reforms and measuresrelated to public hospitals. Consultations conducted during this evaluation, highlighted that this has also prompted a dialogue with the Court of Accounts on complementarity with the compliance audits it conducts and strengthening of cooperation between the two oversight bodies. In 2025, the Central Inspection began carrying out an internal audit mission at the Beirut and Mount Lebanon Water Establishment, with the aim of uncovering deficiencies in the institution's operations and proposing the necessary recommendations to improve performance. Overall, the CI evolving role marks a promising shift toward institutionalized assessments of compliance, performance, and financial integrity and further stakeholder engagement in designing corrective action. This effort needs to be sustained through a systematized approach through standardized audit protocols that ensure consistency across institutions and sectors, regularized inspection cycles to move from reactive to proactive oversight, integrated data systems linking audit findings with budgeting, procurement, and service delivery metrics in addition to capacity-building for inspectors in forensic auditing, sector-specific standards, and digital tools. Looking ahead, revising the law that established the CI could be considered as part of broader efforts to modernize its role and expand its mandate to include public administrations that are not currently subject to its oversight. Furthermore, the Central Inspection (CI) could strengthen its

56- The exact titles of the outputs are as follows: 5.1 Central Inspection modernized and its capacities to detect and fight corruption enhanced, 5.2 The Higher Disciplinary Committee is modernized and its capacities to fight corruption enhanced, 5.3 The Court of Accounts is modernized and its capacities to detect and fight corruption enhanced, 5.4 The Ombudsman Law effectively implemented, 5.5 Internal audit integrated and activated in the public sector, 5.6 Coordination and cooperation to enhance oversight bodies' role is institutionalized and effective.

57- Second Report on the Implementation of the National Anti-Corruption Strategy October 2021 – March 2024. Page 22 proactive communication by more systematically publicizing the controls it has conducted, along with key findings and recommendations. This would contribute to building trust in oversight, promoting social accountability and strengthening transparency.

39. **The Court of Accounts has initiated a strategic development process to reinforce its institutional role in public financial oversight and accountability, but further support still required to strengthen its role in detecting corruption**. During the period under review, the Court of Accounts has begun to reassert its role as a cornerstone of public financial oversight. The publication of the multi-year audit report (2020–2024)[58] marked a symbolic turning point. Its evolving digital presence, including the launch of an official website and public access to reports, including the current development of a 2025 annual report signals a commitment to transparency that was needed. The Court of Accounts has demonstrated growing institutional capacity to detect and address corruption through its judicial decisions, advisory opinions, and audit reports. It has actively engaged in training and technical workshops focused on the new Public Procurement Law and forensic auditing. In line with international standards, the Court has begun transitioning toward ex-post control and performance auditing, developed annual audit plans supported by peer collaboration with the French Court of Accounts. In exercising its judicial oversight, the Court has issued rulings that imposed financial penalties on ministers and officials found responsible for mismanagement of public funds, and referred criminal violations uncovered during its audits to the competent judiciary. On the accounting front, the Court finalized the audit of state accounts and judicial decisions for the years 1995 to 2005 and 2017 to 2020. It also produced thematic reports on treasury advances, grants and loans, and the regulation of the telecommunications sector. These efforts reflect a gradual but meaningful shift toward proactive financial oversight and accountability, which is a necessary step towards reinforcing the Court's role as a key player in anti-corruption efforts. Looking ahead, it remains highly relevant to revisit and revise the Law governing the Court of Accounts, as originally envisioned in the NACS 2020–2025. The strategy called for modernizing the Court's mandate in line with international best practices, including strengthening its independence, expanding its audit scope on performance and compliance audits. A key priority is the specialization of its auditors, enabling the Court to move beyond formalistic reviews toward more substantive ex-post controls and performance evaluations. Alongside the traditional role of reviewing accounts after expenditures, innovative international practices have emerged that rely on real-time auditing of expenses as they occur, thereby reducing corruption risks and enhancing transparency. In this context, the Court of Accounts could consider adopting similar measures, especially in light of Lebanon's major upcoming challenges, notably reconstruction programs and economic reforms, where the need for advanced oversight mechanisms grows to match the expected scale of spending and to ensure immediate accountability before judicial authorities and Parliament. These reforms would also strengthen the dual role of the Court of Accounts – combining its function as a financial judicial body with powers to examine financial violations and issue rulings, and its role as an independent external audit authority of the State, tasked with monitoring financial and administrative performance and issuing objective reports that reinforce transparency and accountability.

58- https://coa.gov.lb/en/reports

40. **The NACS 2020–2025 did not provide sufficient operational space for achievements related to targeted measures to strengthen the institutional capacities of the Higher Disciplinary Committee**. The Higher Disciplinary Committee (HDC), functioning as an administrative court with judicial character, holds extensive authority to adjudicate disciplinary violations across Lebanon's public sector. Its jurisdiction covers permanent, temporary, and contractual employees in public administrations, municipalities, and independent agencies, with the power to impose any sanction prescribed by applicable personnel laws – including dismissal and termination of service. The Committee submits annual reports to the President of the Republic, reinforcing its formal accountability role; however, key highlights of these reports are not publicly accessible which does not allow to have a clear understanding on its performance. Despite its potential to serve as a key actor in Lebanon's anti-corruption architecture, the Committee remains underutilized due to limited financial, human and technical resources, declining referral rates, weak integration with other oversight bodies and lack of publicly accessible information on its work. In fact, given that the Committee's activation relies on referrals from entities such as the Central Inspection, the Civil Service Board, and ministers, it is imperative to establish robust collaboration mechanisms that ensure timely and substantiated case transmission. Without such coordination, the Committee risks remaining a symbolic actor rather than a functional pillar of administrative accountability. Notably, the Committee reported it was preparing a draft law aimed at modernizing its staffing structure and operational framework in line with principles of effectiveness, independence, and contemporary oversight standards and expanding the range of entities authorized to refer cases. The Evaluation Team could not however retrieve any updates on the status of this law. An important insight emerging from this evaluation is that the Higher Disciplinary Committee has received minimal support from international donors – particularly when compared to other oversight bodies. Combined with its limited financial resources, external support could have further supported efforts to modernize the Committee and expand its operational capacity.

41. **Promoting internal control and establishing an ombudsman remain two key gaps that were not achieved under this outcome**. The practical application of internal control remains limited, highlighting the need to strengthen institutional frameworks and develop clear mechanisms that ensure its effectiveness and sustainability within public administrations. Consultations have also shown that initiatives to establish specialized internal audit units are still scarce, which calls for enhancing institutional capacities and developing clear guidelines for the work of these units. As for the Ombudsman's Office, the law enacted in Lebanon in 2015 represented an important step toward consolidating oversight mechanisms and protecting citizens' rights. However, its implementation remains weak and requires fundamental amendments and restructuring to ensure alignment with international standards and best practices.

42. **The institutionalization of effective collaboration and coordination among oversight bodies and with the NACC has shown limited progress under the implementation of the NACS 2020–2025**. Effective anti-corruption efforts require not only strong individual oversight bodies, but also sustained and institutionalized collaboration among them. While some promising ad hoc initiatives have emerged – such as joint cooperation between the Central Inspection and the Court of Accounts – these remain frag-

mented and lack a formalized framework. The lack of coordination is evident both at the operational level – in terms of sharing findings and recommendations – and at the strategic policy level, where structured dialogue to identify gaps and synergies remains limited. This is further compounded by the absence of digital linkages between information systems, which hinders data integration and cross-institutional collaboration. The absence of a regular and institutionalized coordination mechanism limits the ability of oversight institutions to share information, align strategic planning, and build interoperable systems. Initiatives such as the formation and training of a joint committee for continuous coordination, the development of shared strategic planning, the automation and linkage of oversight files, and the creation of a unified database are essential steps toward institutional synergy. Moreover, strengthening communication channels with citizens through both traditional and digital means reinforces transparency and public trust. Without embedding these practices into a formal structure, Lebanon's oversight architecture appears to be operating in silos, undermining the coherence and impact of its anti-corruption strategy. Furthermore, strengthening collaboration with the NACC is essential to ensure coherence and impact across Lebanon's anti-corruption efforts. Collaboration and cooperation between NACC and oversight institutions should be strengthened. This includes establishing formal channels for data sharing, joint investigations, and harmonized reporting mechanisms. Enhanced collaboration would also allow for better follow-up on audit findings, more effective enforcement of asset declaration obligations, and a unified response to systemic risks such as in public procurement. Ultimately, institutionalizing this coordination is key to moving beyond fragmented interventions to structured actions. In addition, this contributes to facilitating the processes of data collection and the publication of periodic reports on the state of corruption and the measures taken to address it by the NACC.

43. **The NACS 2020–2025 created a unique space for society participation in anti-corruption efforts** Work in this area was conducted within the scope of Outcome 6 on 'society empowered to participate in fostering and promoting a culture of integrity' composed of **5 outputs** related to raising awareness of citizens on fighting corruption and how they can contribute to it, fostering integrity values within the youth, promote social accountability, media participation in in fighting corruption and highlighting reforms, establishing a national index to measure integrity and corruption. [59]

44. **The NACS 2020–2025 reform agenda has created a structured space for policy dialogue and civic advocacy, enabling non-governmental actor to play a more active and structured role in promoting integrity and social accountability**. Civil society organizations (CSOs), professional associations, and academic institutions have demonstrated growing capacity to influence reform trajectories, mobilize public engagement, implement social oversight mechanisms. A non-exhaustive selection of impactful initiatives includes, Transparency International Lebanon (LTA) successfully advocated for the inclusion of beneficial ownership provisions in the Public Procurement Law, aligning Lebanon with international transparency standards, Legal Agenda has led sustained campaigns for judicial independence, including through legal analysis and public mobilization.

59- The exact titles of the outputs are as follows: 6.1. Citizens more aware of the impacts of corruption on their lives and conscious of their role in confronting it, 6.2. Integrity values and behaviours better fostered among future generations, 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, 6.4. Journalists and media professionals more capable of highlighting cases of corruption and reform efforts to counter them, 6.5. A national index to measure integrity and corruption defined and disseminated, and periodic publication of its results.

In addition, CSO implemented initiatives to promote social accountability, such as LTA's Rehub a digital oversight tracker to monitor public sector performance and transparency. Gherbal Initiative developed the Monqassat platform, which publishes procurement data and exposes irregularities in public tenders. Furthermore, civil society contributed to awareness-raising and cultural change. For example, the NACC partnered with LTA to deliver youth-focused campaigns on Access to Information (ATI) and Whistleblower Protection. These efforts have helped foster a culture of reporting misconduct and civic responsibility. Professional bodies have also taken proactive steps. The Beirut Bar Association established a dedicated anti-corruption unit to support legal advocacy and facilitate reporting mechanisms. Importantly, Lebanon's engagement with the UNCAC review mechanism has offered a unique opportunity for civil society to participate in the self-assessment stage – a process that, while not mandatory under UNCAC, has proven to be a genuine platform for policy dialogue. This engagement has allowed civil society actors to contribute substantively to the identification of gaps, propose reforms, and validate findings, thereby reinforcing the credibility and inclusiveness of the review process. As highlighted in section 1, while civil society engagement in specific initiatives is evident, its institutionalized participation in the effective implementation of the NACS remains limited.

45. **The NACS 2020–2025 has actively supported the development of frameworks aimed at promoting integrity values among future generations**. As part of its implementation, the Strategy encouraged a range of educational initiatives, including the integration of integrity and anti-corruption themes into university curricula. Notably, the NACC signed Memorandum of Understanding with several universities – including the American University of Beirut (AUB) and the Lebanese University – to promote anti-corruption education and civic engagement. the Lebanese University launched a dedicated master's program on anti-corruption, while the Sagesse University designed a mandatory anti-corruption course to be included in undergraduate programs. In addition, several universities – including Université Saint Joseph (USJ) and the American University of Beirut (AUB) – have established governance observatories to support research, policy dialogue, and civic engagement. These initiatives represent promising steps toward embedding integrity in academic culture and empowering youth as future agents of change. furthermore, the Youth4Governance program, further exemplifies student participation in public sector reform, offering hands-on experience in governance and transparency initiatives. However, the Evaluation Team was informed that, as of the time of review, no formal programs on ethics or anti-corruption had yet been developed within the school education system. Sustained efforts will be needed to extend integrity education to earlier stages of learning and ensure long-term impact**.** In 2024, within the framework of the NACS, a dedicated youth task team, composed of seven members, was established to develop a Youth Action Plan to support its implementation. The plan, titled "A Society Empowered to Participate in Fostering and Promoting a Culture of Integrity," includes a mechanism for the follow-up, implementation, and evaluation of its activities.

46. **NACS established a framework to support media in exposing corruption and promoting priority reforms.** Throughout the reporting period, Lebanese media played a pivotal role in highlighting corruption sources and risks across sectors, providing in-depth analysis of corruption dynamics and in amplifying reform initiatives with potential for systemic change[60]. However, in 2025, Lebanon witnessed escalating tensions around the space for investigative journalism uncovering cases related to corruption and financial governance as documented by Amnesty International,[61] calling for urgent measures to safeguard the independence of media. In parallel with broader efforts to strengthen media integrity, several Lebanese universities have taken proactive steps to institutionalize investigative journalism as a tool for anti-corruption[62].

47. **The NACS 2020–2025 allowed to activate a culture of sectoral risk management in the public administration.** Work in this area was conducted within the scope of Outcome 7 on 'Preventive Measures against Corruption Integrated at the Sectoral Level' to composed of **4 outputs** related to administrative simplification of public services, corruption risk analysis and management as well as engagement of private sector[63]. Most actions under this outcome were centered on piloting corruption risk assessment methodologies and tools across targeted sectors. These initiatives aimed to identify vulnerabilities, streamline procedures, and institutionalize preventive measures. The implementation of the Sectoral Corruption Risk Management (SCRM) methodology in Lebanon has led to tangible reforms across several public institutions, notably the Lebanese University and key ministries. At the Lebanese University, a task force of 36 members was established to lead the process, resulting in an action plan aimed at reforming administrative decisions, revising mandates and procedures, and redesigning the university's website to reflect the right of access to information. The University also initiated the development of an electronic system for registration and for public procurement. In parallel, SCRM efforts within the Ministry of Justice and the Ministry of Economy and Trade have produced concrete outputs, including a unified inspectors' guide, reengineering of business processes, and updates to administrative decisions to embed anti-corruption measures. The Ministry of Economy's website has been revamped, and its consumer protection complaint system is being upgraded in line with SCRM recommendations. Additionally, a corruption risk assessment was conducted at the Beirut Execution Court, with ongoing consultations to develop an electronic random case assignment system. The Ministry of Industry has similarly adopted changes to administrative procedures, integrating anti-corruption safeguards and issuing a standardized guide to support consistent and transparent decision-making field visits by staff. Critical gaps persist in two areas: administrative simplification of public services and engagement of the private sector. These dimensions are essential to building a preventive and sustainable anti-corruption framework, yet they remain

60- Examples include Executive dedicated in 2020 a special report of its paper magazine on corruption. Later, it launched in 2022 a televised dialogue series titled "Lazem Taaref Ta Tuhaseb" (You Must Know to Hold Accountable). The series featured Lebanese and international experts, public officials, and civil society representatives. It spotlighted the role of individuals and institutions in preventing and combating corruption to advance sustainable development. Topics included public procurement, asset recovery, illicit enrichment, forensic auditing, banking secrecy, and financial disclosure. These episodes contributed to raising public awareness and deepening specialized knowledge on key issues central to Lebanon's recovery and reconstruction discourse.

61- Cases such as the summoning of investigative outlets such as Daraj Media and Megaphone News—following their reporting on financial governance and Central Bank appointments. Lebanon: Authorities must immediately dismiss complaint against independent media outlets - Amnesty International

62- Notably, Saint Joseph University (USJ) launched a university diploma in investigative journalism aimed at promoting evidence-based reporting and fostering independent, ethical media practices. The Lebanese University, in collaboration with civil society partners, developed a dedicated module within its Faculty of Media, offering practical training and publication opportunities in outlets such as An-NaharInvestigative Journalism As A Tool For Fighting Corruption, And Promoting Transparency And Accountability: The Role Of The Faculty Of Media At The Lebanese University | Daleel Madani. These efforts complement international initiatives like "Investigation Lebanon", which provide tailored support to journalists covering transparency and institutional reform. Investigation Lebanon | Lebanon | CFI Médias

63- The exact titles of the outputs are as follows: 7.1. Transactions between public administration and public service users simplified and more transparent, 7.2. Corruption risk management methodologies and tools are incorporated in a first sample of public administrations, institutions, and municipalities, 7.3 Corruption risks reduced in priority areas and sectors 7.4 The private sector as active partner in corruption prevention underdeveloped across most sectors. Administrative procedures continue to be complex and opaque, limiting citizen access and institutional efficiency. The administrative simplification would need to be prioritized in reform efforts of public services as a core operational pillar of public sector reform. While simplification directly contributes to anti-corruption efforts by reducing discretionary power and enhancing transparency, its impact extends far beyond the integrity agenda. Streamlined procedures, digitized service delivery, and standardized decision-making processes are foundational to improving institutional efficiency, restoring citizen trust, and enabling inclusive access to services. Moreover, private sector engagement – while recognized as a strategic priority – has not been systematically mobilized, leaving untapped potential for co-ownership of integrity reforms.

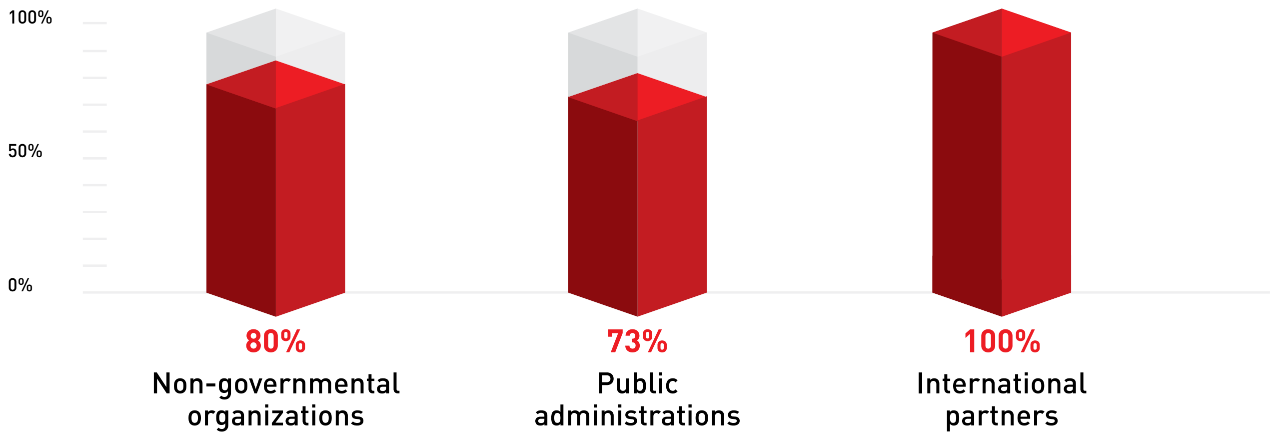
48. **The financial, human, and material resources allocated to the implementation of the NACS 2020–2025 remain insufficient**, largely due to the country's prolonged economic, political, and security crisis. The collapse of Lebanon's financial system – marked by the severe devaluation of the Lebanese pound and the erosion of public revenues – resulted in a major deficit in state capacity, rendering institutions unable to finance even basic operations. Respondents of the survey conducted during this evaluation shows that across the public administration, non-government and international development partners lacks financial and human capacity is considered the number one challenges to the NACS effective implementation. Specifically, 80 percent of non-governmental actors and 73 percent of public administration respondents identified financial constraints as a key challenge, while 75 percent of non-governmental actors and 69 percent of public administration respondents pointed to human resource limitations. Notably, 100 percent of international development partners cited both financial and human capacity gaps as critical barriers, underscoring the urgent need for targeted institutional support and resource mobilization to sustain reform efforts. The consultations and field visits to public administrations confirmed a number of structural and operational challenges that warrant urgent attention. Despite the commitment expressed by several institutions, the evaluation identified persistent gaps in information systems, critical shortages in human resources, and unmet needs in basic operational capacities. As such, all oversight institutions currently face vacant positions that remain unfilled – both at the decision-making level (e.g. their boards) and within their technical and administrative staff – which significantly limits their operational capacities.

49. **Beyond the crisis context, Lebanon's public budgeting system remains opaque and fragmented, with limited programmatic budgeting** and weak alignment between strategic planning and actual resource flows. Therefore, it is not possible to assess the precise resources dedicated to NACS implementation. This challenge is compounded by the absence of a dedicated budget line for anti-corruption reforms and the lack of integrated performance-based budgeting mechanisms. In fact, Lebanon's scores 17/100 on the 2023 Open Budget Index[64], placing it 103rd out of 125 countries. The survey highlights that key budget documents – such as the Pre-Budget Statement, In-Year Reports, Mid-Year Review, Year-End Report, and Audit Report – are either not produced or not made publicly available. These findings underscore the structural limitations in Lebanon's budget system, which hinder transparency, accountability, and

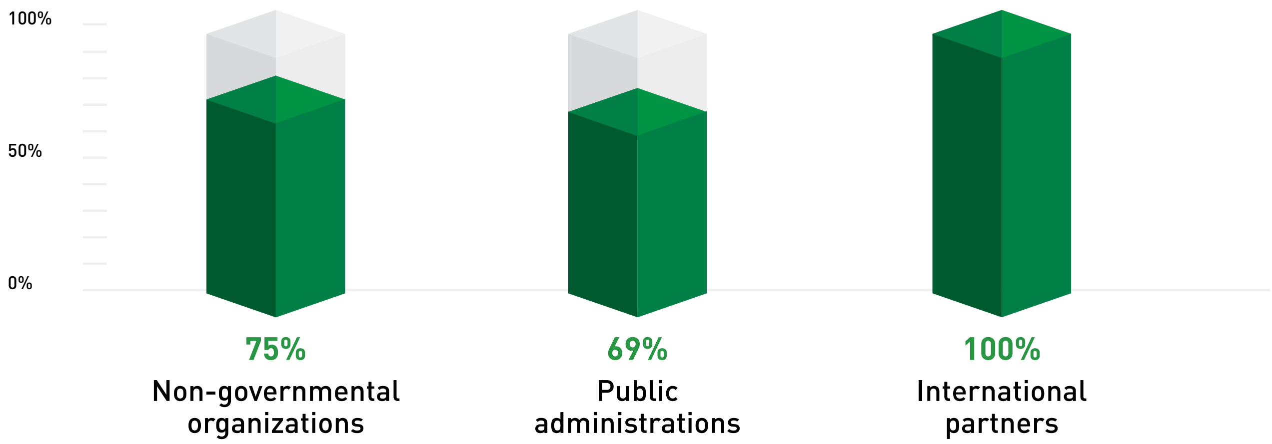
64- https://internationalbudget.org/sites/default/files/country-surveys-pdfs/2023/open-budget-survey-lebanon-2023-en.pdf the ability to track strategic reforms like the NACS. Strengthening fiscal governance and integrating anti-corruption priorities into medium-term expenditure frameworks remains an urgent institutional need. The ongoing Diagnostic of Governance and Corruption conducted by the IMF is expected to provide valuable insights and recommendations on this fiscal governance and public financial management, which falls outside the scope of the current evaluation.

Barriers to implementation of the National Anti-Corruption Strategy – resource gaps

Financial deficit as a significant challenge



Human resource limitations as a major barrier



Public budget transparency – Open Budget Index 2023

17
out of 100

Ranked 103rd out of 125 countries – indicating a sharp decline in fiscal transparency

50. **Donor support has played a critical role in maintaining core state functions and advancing selected anti-corruption reforms under the NACS,** namely from European Union Delegation, DANIDA, GIZ, UNDP, AFD, Expertise France, and the World Bank. The Strategy has served as a valuable framework for clarifying national priorities and allowing international assistance to support a clear roadmap for reform. However, this support could not meet the full funding and human resource requirements needed to implement all NACS actions effectively. Consultations revealed that outputs under NACS which received international support often achieved tangible progress, notably in public procurement reform, modernization of the Court of Accounts, the Central Inspection, the PAA and activation of the NACC, and the harmonization of the legal framework, strengthening of risk management, support to civil society engagement, social oversight and accountability. More recently, donor engagement is helping to catalyse momentum around urgent civil service reforms. Conversely, components of the Strategy that did not receive external support showed little to no advancement. For example, the Higher Disciplinary Board which lacked dedicated funding and technical assistance, lagged significantly in developing innovative approaches, including digital infrastructure. Or the Ombudsman law which did not receive any support and therefore did not progress. This disparity underscores the critical importance of sustained and coordinated resource mobilization to ensure balanced progress across all pillars of the Strategy. **In fact, to ensure that all components of the NACS benefit from sustained progress, there is a pressing need to strengthen coordination with development partners, both to optimize financial and technical assistance and to promote a more comprehensive and balanced approach to reform implementation**. However, looking ahead, and to ensure the sustainability of reform efforts, the government should secure higher domestic financial allocations to support implementation and institutional capacity.

51. Given the critical role of anti-corruption reform in Lebanon's economic recovery and reconstruction, the draft 2026 draft budget allocations to oversight institutions and the judiciary, raise concern. **Despite repeated commitments to strengthen accountability and transparency, the budget reflects a continued under-prioritization of these sectors**. Allocations remain insufficient to support the operationalization of key reforms, particularly in areas requiring digital infrastructure, institutional modernization, and judicial independence. This funding gap risks undermining the momentum of NACS implementation and constraining Lebanon's ability to meet its international obligations under UNCAC. While donor support has helped sustain select initiatives, the lack of domestic resource commitment signals a persistent challenge to advancing anti-corruption efforts in a meaningful and systemic way.

Recommendations

Implementation gaps	In the upcoming update of the National Anti-Corruption Strategy, it is imperative to address the gaps that affected the implementation of the 2020-2025 strategy, through:
1. **Strengthening implementation mechanisms for specialized anti-corruption legislation and completing the legislative framework**	To consolidate Lebanon's anti-corruption framework, it is essential to support and update the implementation mechanisms of specialized legislation – such as laws on asset disclosure, access to information, whistleblower protection, and public procurement – while simultaneously pursuing the completion of the broader legislative framework and supporting the National Anti-Corruption Commission (NACC) in its work, which is based on activating the relevant mechanisms. Recommendations include: • Enhance the enforcement of the Asset and Interest Disclosure and Illicit Enrichment Law by equipping the NACC with forensic auditing capacity to detect discrepancies, strengthening secure digital infrastructure for declaration submissions, and moving towards establishing automated cross-checking systems with tax, property, and banking databases to support verification. The NACC should also be granted direct access to these data to effectively carry out its review and verification functions. Furthermore, the NACC should publish information on levels of compliance and instances of incorrect or incomplete disclosures to enhance transparency and public accountability. • Increase institutional compliance with the Access to Information Law by providing enhanced training and guidance to public entities, ensuring timely responses to information requests, and promoting the publication of mandatory information (i.e. key administrative documents such as decrees, decisions, instructions, circulars, annual reports, and financial operations above a defined threshold), as well as the proactive disclosure of additional information (e.g. budgets, procurement, and staffing) across all public entities. • Operationalize the Whistleblower Protection Framework by building on the existing institutional setup and addressing key coordination and implementation gaps through: clarifying institutional roles following the appointment of the NACC; facilitating multiple channels for whistleblowers – either directly to the NACC, via the centralized WBPO in Beirut (managed by the Court of Cassation Public Prosecution), or through the Court of Cassation Public Prosecution, the Financial Public Prosecution, Cassation Public Prosecution, the Financial Public Prosecution, or the Appellate Public Prosecution in all governorates, as per the 2020 legal amendment; strengthening coordination

	Cassation Public Prosecution, the Financial Public Prosecution, or the Appellate Public mechanisms between the NACC, Public Prosecution, Security Forces Prosecution in all governorates, as per the 2020 legal amendment; strengthening coordination mechanisms between the NACC, Public Prosecution, Security Forces and the Civil Service Board (CSB) to ensure timely and effective management of disclosures, physical protection measures, and safeguards against professional retaliation in public employment; and finalizing and implementing standard operating procedures (SOPs) for both the NACC and WBPO, including secure and confidential reporting channels (e.g. hotline, encrypted email, online portal), reassignment protocols, and confidentiality guarantees. • Consider initiating steps toward operationalizing the Asset Recovery Framework, including the gradual activation of the recovery unit within the NACC and the establishment of the National Fund for recovered assets. This could be complemented by the development of preliminary procedures for tracing, freezing, and repatriating stolen assets, in alignment with international standards and national priorities. • Strengthen enforcement and transparency mechanisms under the Public Procurement Law by ensuring full compliance through the application of uniform publication standards across all procuring entities. This includes the mandatory use of the Public Procurement Authority (PPA) website for publishing procurement notices, contract awards, tender documents, and implementation status updates. To reinforce transparency and accountability, introduce performance scorecards to monitor each entity's adherence to disclosure obligations under the PPL. These scorecards should be publicly accessible and updated regularly, allowing for comparative benchmarking and civil society oversight. • Amend the Law on Combating Corruption in the Public Sector to explicitly extend its provisions to cover corruption in the private sector. This expansion should include provisions on the liability of legal persons, revolving door restrictions, and whistleblower protection mechanisms in the private sector, thereby addressing critical regulatory gaps and aligning with international standards such as UNCAC. Consequently, the mandate of the NACC should be broadened to encompass oversight and enforcement functions related to private sector integrity, enabling a more comprehensive and cross-sectoral approach to corruption prevention and accountability.
1. **Strengthening implementation mechanisms for specialized anti-corruption legislation and completing the legislative framework**	

1. **Strengthening implementation mechanisms for specialized anti-corruption legislation and completing the legislative framework**	• Consider initiating preparatory steps towards amending the 2015 Ombudsman Law to institutionalize an independent mechanism for receiving, investigating, and resolving citizen complaints. The law should clearly define the Ombudsman's mandate, powers, and procedures.
2. **Developing and adopting a comprehensive framework of integrity policies in the civil service that complements existing legislation and creating synergies with Anti-Money laundering frameworks**	This framework would strengthen Lebanon's anti-corruption architecture beyond legal compliance; it should prioritize preventive measures, behavioural change, and institutional coherence. Specifically, it should include: • Develop a dedicated and unified policy framework on conflict-of-interest management to identify, disclose, and sanction conflicts of interest across public entities, complemented by mandatory training for public officials. • Adopt mechanisms to embed integrity standards into recruitment, promotion, compensation procedures (including integrating mandatory conflict of interest screening), as well as performance evaluations, and formalize partnerships with public training institutes and the National Anti-Corruption Commission to co-develop integrity curricula, and embed mandatory training modules into onboarding, promotion, and continuous training frameworks for public officials at all levels. • Establish a comprehensive national framework to assess the adoption and implementation of integrity policies and measure their impact within public institutions, with the National Anti-Corruption Commission responsible for its oversight and implementation. The system would need to be anchored in a set of standardized indicators or a national integrity index, enabling comparative analysis and evidence-based decision-making. It should track progress on key reforms – such as asset and interest declarations, access to information, whistleblower protection, and conflict of interest management – while identifying bottlenecks and areas for improvement. The system must include clear methodologies, institutional reporting obligations, and mechanisms for civil society engagement, with public dissemination of findings to reinforce transparency and accountability.

2. **Developing and adopting a comprehensive framework of integrity policies in the civil service that complements existing legislation and creating synergies with Anti-Money laundering frameworks**	• Implement a mechanism for Regulatory Impact Assessment from an anti-corruption perspective to anticipate and mitigate corruption vulnerabilities in legal frameworks by developing a standardized RIA methodology to assess corruption risks in draft laws and existing legislation, and training legal drafters and parliamentarians on corruption-sensitive legislative design. • Strengthen the linkages between corruption and Anti-Money Laundering efforts including through national risk assessment focused on corruption-linked money laundering – particularly involving politically exposed persons (PEPs) – integrating corruption indicators into financial intelligence analysis and reporting, promoting parallel financial investigations in corruption cases, and enhancing coordination between the Special Investigation Commission, NACC and the judicial authorities to ensure timely intelligence sharing, joint case development, and coherent enforcement. • Develop a comprehensive policy and set of procedures to promote internal control and corruption risk management in public administration, building on lessons learned and tools piloted in selected entities, while ensuring scalability and contextual relevance. • Establish and activate specialized internal audit units and develop clear guidelines for their work within the public administration, ensuring the institutionalization of this function and assigning clear responsibilities for following up on and implementing the recommendations issued in audit reports.
3. **Enhancing institutional effectiveness and operational capacities to support anti-corruption efforts**	**National Anti-Corruption Commission (NACC)** To consolidate the progress achieved since the establishment of the National Anti-Corruption Commission (NACC) and ensure its long-term effectiveness, the following measures are recommended: • Complete and activate the staffing structure of the Commission through the Civil Service Board's implementation of the competitive examination stipulated in Law No. 175/2020, ensuring adequate human resources, technical expertise, and administrative continuity. • Transition from reliance on volunteers and ad hoc support to a sustainable institutional model backed by national budget allocations and coordinated donor engagement.

	• Develop and adopt a comprehensive and publicly available set of performance indicators and outcome-based metrics to assess the NACC's impact across its core mandates, particularly in corruption detection, investigation, and enforcement. • Establish a periodic review mechanism to monitor progress, identify bottlenecks, and inform strategic adjustments. • Strengthen the NACC's outreach to citizens through accessible complaint mechanisms, public reporting tools, and digital platforms. • Deepen regional cooperation and knowledge exchange with peer institutions to enhance institutional learning and build capacities of NACC members and staff.
3. **Enhancing institutional effectiveness and operational capacities to support anti-corruption efforts**	**Public Procurement Authority (PPA), Procuring Units and Complaint Authority**
	• Public Procurement Authority (PPA), Procuring Units and Complaint Authority • Expedite the full staffing and appointment of members of the PPA Board of Directors to ensure adequate technical and administrative capacity to fulfil its mandate. • Disseminate clear guidance on the role of the PPA to prevent procedural delays and resource strain caused by misinterpretation. • Finalize and institutionalize job descriptions and competency frameworks for procurement units within buying entities to ensure functional alignment. • Establish and activate the Complaints Authority as a priority, providing a formal and independent mechanism for grievance redress, bidder protection, and corruption detection. • Strengthen efforts to professionalize the procurement workforce through actions such as launching a national training strategy targeting procurement staff at both central and local levels. This should include modules on integrity standards, risk detection, and legal compliance, as well as certification pathways and continuous learning programs to build a cadre of specialized procurement professionals. • Integrate periodically feedback loops from civic oversight and civil society tracking initiatives into procurement planning and evaluation processes.

	• Develop a monitoring and evaluation framework to track progress in transparency and integrity in public procurement, including periodic surveys targeting public officials and the private sector.
	Court of Accounts
3. **Enhancing institutional effectiveness and operational capacities to support anti-corruption efforts**	• Modernize the oversight mechanisms of the Audit Bureau in line with international standards for external auditing and public accountability, drawing on lessons learned from recent reforms and the experiences of comparable institutions. This update should be undertaken alongside a review of the Audit Bureau Law to expand its powers, strengthen its independence, enable it to conduct performance audits, and adopt innovative practices for realtime expenditure oversight, with particular attention to highrisk spending areas. • Expedite the appointment of judges and the recruitment for vacant positions within the Court of Accounts to strengthen institutional capacity and ensure timely execution of its oversight mandate. • Institutionalize clear and standardized protocols for the referral of criminal violations, ensuring systematic follow-up with judicial authorities and Parliament. • Build specialized capacities in forensic auditing, procurement oversight, and digital analytics supported by peer learning and technical exchange with international counterparts. • Expanding digital transparency tools – such as open data platforms and interactive dashboards – and proactively publishing thematic and annual audit reports. • Lead the development of a national evaluation framework that integrates performance dashboards, sectoral scorecards, and periodic impact assessments to monitor the effectiveness of public spending.
	Central Inspection
	• Develop the law related to the establishment of the Central Inspection Bureau. • Accelerate staff recruitment within the Central Inspection to enable the institution to effectively carry out its mandate and fulfil its oversight responsibilities.

	• Develop standardized audit protocols and inspection cycles across sectors to shift from reactive to risk-based oversight, prioritizing high-risk areas and systemic vulnerabilities. • Scale up pilot performance auditing initiatives into a national performance audit program, incorporating sectoral risk matrices and corrective action plans. • Formalize collaboration with the Court of Accounts and other oversight bodies to ensure audit complementarity, shared intelligence, and coordinated follow-up. • Establish a professional development framework for inspectors, including certification in forensic auditing, digital analytics, and emerging oversight methodologies. • Integrate the Central Inspection's digital platforms with national systems for budgeting, procurement, and service delivery to enable cross-sectoral analytics and real-time monitoring. • Link the Central Inspection Bureau to the database of entities under its oversight as a step toward implementing digital auditing.
3. **Enhancing institutional effectiveness and operational capacities to support anti-corruption efforts**	**Higher Disciplinary Authority**
	• Accelerate adoption of the draft law to modernize the Committee's mandate, staffing, and referral mechanisms. • Establish binding coordination agreements and referrals protocols with Central Inspection, Civil Service Board, and ministries to ensure timely and substantiated case transmission. • Publish summaries of annual reports and disciplinary decisions to enhance public trust and institutional visibility while ensuring the necessary confidentiality and data protection. • Mobilize international support to strengthen operational capacity, including digital case management.
	Civil Service Board
	• Develop a comprehensive Code of Conduct for public officials that establishes clear and enforceable standards for ethical behaviour, professional integrity, and accountability. The Code should include provisions addressing conflicts of interest, gift acceptance, and post-employment restrictions; guidelines that promote transparency, impartiality, and responsible use of public resources; and include enforcement mechanisms such as disciplinary procedures and confidential reporting channels. To ensure consistent application, mandatory and continuous

3. **Enhancing institutional effectiveness and operational capacities to support anti-corruption efforts**	training modules should be introduced across institutions, and the Code should be fully integrated with existing legal frameworks – including asset and interest disclosure systems – to reinforce coherence and institutional credibility. • Develop integrity-based human resources management systems, including risk screening, ethics training, and whistleblower protection protocols. • Deliver targeted training for Civil Service Board personnel in anti-corruption standards, digital HR tools, and strategic workforce planning. • Enable the Civil Service Board to conduct an updated, comprehensive survey of public sector employees, regardless of their mode of recruitment (competitive examination or contractual appointment).
4. **Consolidating institutional coordination and collaboration**	• Improve coordination on the civil service reform by leveraging the newly appointed Inter-Ministerial Committee on Administrative Reform as a strategic platform to harmonize mandates, streamline reform efforts, and promote a unified vision for administrative modernization. The roles of OMSAR, the Civil Service Board, and the NACC should be clearly defined within this framework, particularly in relation to advancing integrity reforms in the civil service. • Institutionalize structured coordination among oversight bodies and with the NACC by establishing a formal, multi-institutional mechanism for collaboration at both operational and strategic levels. This should include joint coordination mechanisms, shared strategic planning frameworks, and interoperable digital information systems to facilitate data sharing, joint investigations, and coherent follow-up on audit and control findings. The NACC must be systematically integrated into the work of key oversight institutions – including the Court of Accounts, Central Inspection, and Civil Service Board – to ensure a unified response to systemic corruption risks.
5. **Advancing judicial reform and anti-corruption enforcement**	• Prioritize the enactment of laws on the independence, integrity and effectiveness of judicial, administrative, and financial courts. • Institutionalize transparent criteria for judicial appointments and performance evaluations, supported by a publicly accessible and mandatory code of conduct and continuous ethics training.

5. **Advancing judicial reform and anti-corruption enforcement**	• Institutionalize transparency and public reporting through annual publication of judicial annual activity reports, as mandated by the Access to Information Law, including performance metrics, case statistics, and disciplinary actions. • Assess and scale up promising initiatives for the electronic distribution of judicial files, ensuring nationwide implementation and system interoperability. • Launch a national digitalization roadmap for court case management, with clear timelines, budget allocations, and follow-up mechanisms. • Establish citizen-facing structures in courthouses to facilitate access to information, provide guidance, and enable grievance redress. In parallel, accelerate reforms in forensic medicine and commercial registry management to reduce discretionary practices and improve service quality, and develop a unified framework for judicial oversight that integrates short-term monitoring tools with long-term institutional accountability systems. • Enhance legal and technical capacity to prosecute corruption by designing national specialized training programs for judges, prosecutors, and oversight bodies (especially the NACC) in forensic auditing, financial investigations, asset tracing, and cross-border cooperation. In parallel, institutionalize coordination between oversight bodies, the NACC, and the Public Prosecution to ensure timely and effective prosecution of corruption cases.
6. **Strengthening institutionalized coordination, structured collaboration, and co-creation with non-governmental actors**	• Institutionalize structured policy dialogue with the private sector on key priority areas, including public procurement integrity, by establishing a formal and recurring mechanism led by the Public Procurement Authority (PPA) with participation from private sector stakeholders (including business associations, chambers of commerce, sectoral federations, and civil society observers). This platform should hold regular consultation cycles to: (i) discuss procurement reforms, integrity standards, and implementation challenges, including feedback on Standard Bidding Documents (SBDs), supplier obligations, and digital platform usability; and (ii) jointly develop integrity tools such as supplier codes of conduct, whistleblower protection protocols tailored to private sector realities, and collective action initiatives such as Integrity Pacts. The platform should commit to publishing dialogue outcomes and policy recommendations to reinforce transparency and demonstrate responsiveness to stakeholder concerns.

6. **Strengthening institutionalized coordination, structured collaboration, and co-creation with non-governmental actors**	• Institutionalize collaboration with academic observatories to advance research on corruption within universities and support the anti-corruption strategy – particularly the work of the NACC, oversight bodies, and OMSAR – through rigorous research and the use of advanced statistical tools. This collaboration should aim to i) support postgraduate research and advanced studies on corruption dynamics, institutional vulnerabilities, and reform impact, with a focus on the national context; ii) leverage the expertise of established observatories and exchange of data to generate sectoral diagnostics, integrity risk assessments, and policy briefs that inform national strategies; iii) Create joint research platforms and data-sharing protocols between public institutions and universities to enhance transparency and analytical capacity; iv) embed academic findings into policymaking cycles, including the design of training modules, public awareness campaigns, and performance indicators.
7. **Providing the necessary conditions and resources to support the implementation of future iterations of anti-corruption.**	• Strengthen domestic resource commitments by prioritizing anti-corruption reform in national budgeting processes. This includes increasing financial allocations to oversight institutions, the judiciary, and the NACC, with particular attention to digital infrastructure, institutional modernization, and operational capacity. A more strategic and transparent budgeting approach is needed to align resource with NACS priorities and ensure sustainable implementation. • Address human resources and operational gaps with immediate efforts to assess and address critical shortages in staffing, technical expertise, and basic operational tools across public institutions involved in NACS implementation. • Establish a regular formalized donor coordination mechanism on anti-corruption reforms and expand support to underfunded reform areas. Building on the Strategy's role as a coordination framework, this mechanism should ensure that financial and technical assistance is strategically aligned, effectively distributed, and responsive to evolving needs. A joint platform within the NACS implementation structure could help harmonize support across pillars and reduce disparities in the implementation of NACS outputs.

Monitoring and Evaluation (M&E) framework

- **Develop a comprehensive monitoring and evaluation (M&E) framework for the NACS** that includes periodic evaluation reports and clearly defined Specific, Measurable, Achievable, Relevant, and Time-bound (SMART) indicators, with established baseline and targets. This framework should enable early identification of implementation challenges, support timely corrective actions, and strengthen accountability mechanisms. Given limited specialized capacities within public institutions, collaboration with civil society organizations and academic institutions should be leveraged to support data collection, analysis, and evidence-based reporting, thereby promoting informed decision-making and a culture of transparency and continuous improvement.

3 Impact and sustainability

52. **The implementation of Lebanon's first NACS marked a pivotal milestone in formalizing the country's commitment to integrity reforms**. It laid the groundwork for legislative, institutional, and procedural changes aimed at enhancing transparency, activating accountability, and ending impunity. However, assessing its impact remains challenging due to the absence of a comprehensive national data and performance indicators and the exceptional multi-crisis context in which it unfolded – including economic collapse, institutional paralysis, and regional instability.

53. **International indicators and external assessments highlight however limited changes in citizen's perception, global indicators and reports**. Lebanon's CPI score has stagnated in the low 20s (out of 100), ranking 150th globally in 2024. Also, as shown by the Arab Barometer report in 2024, when asked to identify the most pressing issue facing Lebanon, a plurality of 33 percent of respondents cited the economic situation, followed closely by 29% who pointed to corruption[65]. Furthermore,

65- https://www.arabbarometer.org/wp-content/uploads/AB8-Lebanon-Country-Report-EN.pdf

Lebanese citizens report the lowest levels of trust in their government compared to all other surveyed countries in the region. Only 7 percent say they have "quite a lot" or "a great deal" of trust in the government, while a striking 76 percent express no trust at all. This deep mistrust extends across key institutions: just 13 percent trust the legal system, 9 percent trust parliament, and only 8 percent express trust in the prime minister. These figures reflect a profound crisis of confidence in Lebanon's governance structures and underscore the urgency of institutional reform and transparency[66]. 82 percent of respondents believe that corruption is widespread at the national level, with an additional 15 percent perceiving it as moderately present. 69 percent say the government is not taking any meaningful steps to combat corruption, reflecting deep public scepticism toward institutional accountability and reform efforts. This reflects persistent perceptions of entrenched corruption and limited enforcement, despite formal reforms.

In terms of global analysis and indicators, the impact of anti-corruption efforts in Lebanon remains limited. The Worldwide Governance Indicators of the World Bank[67], reveal a consistent and troubling decline across five of the six dimensions of governance and with a sharper decline in 2023 compared with data of 2018 and 2013. Most notably, the Control of Corruption score decreased from 28.22 to 22.44 out of 100, confirming entrenched governance failures and ineffective accountability mechanisms. According to the World Justice Project's 2024 Rule of Law Index[68], Lebanon continues to face significant challenges in combating corruption across all branches of government. The country's overall score for "Absence of Corruption" remains stagnant at 0.36, placing it 113th out of 142 countries globally. Sub-factor scores reveal deeper institutional weaknesses: the executive branch scored 0.33, ranking 123rd globally and last in the region, while the legislative branch scored a mere 0.16, placing Lebanon 126th globally and again last regionally. In contrast, the police and military sub-sector scored 0.52, indicating relatively stronger integrity safeguards. These findings suggest that while some progress has been made in operational sectors, systemic corruption – particularly at the political and legislative levels – continues to undermine reform credibility and public trust.

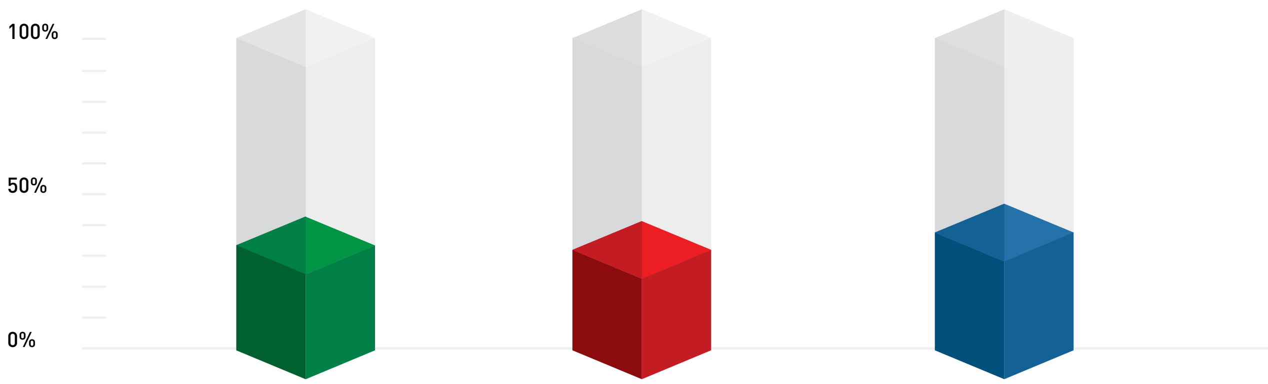
The data reinforces the need for Lebanon to accelerate implementation of its National Anti-Corruption Strategy (NACS), strengthen judicial independence, and institutionalize regular monitoring aligned with UNCAC review mechanisms. International assessments consistently recommend substantially strengthening these efforts to address systemic governance vulnerabilities and restore trust in public administration. The World Bank's 2024 Systematic Country Diagnostic[69] highlights Lebanon's "collapsing governance" an considers that despite NACS adoption " major "breakthroughs in combating corruption and improving accountability and transparency remain elusive the NACS". According to IMF, Lebanon 2023 Article IV Consultation Report, reforms should aim at "strengthening transparency and accountability, addressing governance vulnerabilities, and generating a strong buy-in from the population, which views the crisis as the result of systemic corruption".[70]

66- Ibid.
67- https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access
68- https://worldjusticeproject.org/rule-of-law-index/country/2024/Lebanon/Absence%20of%20Corruption/
69- https://documents1.worldbank.org/curated/en/099092024170038879/pdf/BOSIB1db9263530b91b68b16e8047550793.pdf
70- https://www.imf.org/en/publications/cr/issues/2023/06/28/lebanon-2023-article-iv-consultation-press-release-staff-report-and-statement-by-the-535372

First: Arab Barometer 2024 – Citizens’ priorities and trust in government

Source: Arab Barometer Report 2024

Most prominent issue facing Lebanon (citizens’ perspectives)



Economic situation	Corruption	Other issues
33%	**29%**	**38%**

69% of citizens believe that the government is not taking any meaningful steps to combat corruption

82% believe that corruption is widespread at the national level

15% believe that corruption is only moderately present

Lebanese citizens’ trust in government (lowest regional level)

7%

trust the government “quite a lot” or “a great deal”

versus

76%

express ‘no trust at all’ in the government

13% trust the legal system

9% trust the parliament

8% trust the Prime Minister

Second: International indicators on anti-corruption and governance

Source: Transparency International 2024, World Justice Project 2024, World Bank WGI 2023

Corruption Perceptions Index (CPI) - 2024

20

out of 100

ranked 150th globally

Rule of Law Index - 2024

0.36

out of 1.00

ranked 113th out of 142 countries

Control of Corruption Index: Comparison between 2013, 2018, and 2023

Control of Corruption

Declined from 28.22% to 22.44% ▼

2013	28.22%
2018	23.14%
2023	22.44%

Rule of Law Index – Sub-factors scores for 'Absence of Corruption' 2024

Executive authority (Government)

0.33

ranked 123rd globally – lowest regionally

Legislative authority (Parliament)

0.16

ranked 126th globally – lowest regionally

Police and military

0.52

best among sectors

54. Based on the evidence presented in Section 2, despite notable implementation challenges, **the NACS has contributed meaningfully to Lebanon's anti-corruption landscape.** It laid critical legislative foundations through the adoption of key laws on access to information, whistleblower protection, asset declaration, and public procurement – establishing a specialized framework for prevention, detection, and prosecution, albeit with uneven enforcement. It also fostered institutional awareness, with ministries and oversight bodies beginning to integrate integrity tools such as risk mapping and transparency portals, while civil society engagement around corruption issues has visibly increased. Furthermore, NACS enhanced policy coherence by serving as a unifying framework for donor coordination, technical assistance, and national planning – helping to align previously fragmented efforts across sectors and stakeholders.

55. The NACS 2020–2025 is anchored in three strategic objectives: enhancing transparency, activating accountability, and ending impunity. In its pursuit of **transparency**, the Strategy aimed to institutionalize openness by improving public access to government information and fostering trust in state institutions. Initiatives, as highlighted in section 2, such as the launch of a centralized public procurement website, the publication of thematic audit reports by the Court of Accounts and launch of websites and transparency portals across several ministries demonstrate initial progress. On the **accountability front**, NACS contributed to clarifying institutional mandates and promoting oversight mechanisms, including whistleblower protections and integrity tools. Nonetheless, enforcement capacities remain limited. The third pillar – **ending impunity –** remains the most politically sensitive and structurally constrained. Despite the prosecution of select high-profile cases, judicial independence continues to be undermined, and convictions remain rare. These dynamics underscore the need for sustained political will, institutional safeguards, and civic engagement to ensure that anti-corruption efforts move beyond symbolic gestures toward meaningful reform.

56. Strategic public communication plays a critical role in raising awareness fostering civic engagement on reforms implemented under the NACS. Despite notable efforts, the strategy's specific objectives, achievements, and impact remain insufficiently conveyed, limiting public understanding and buy-in. In fact, 78 percent of respondents from civil society organizations consider communication regarding the progress made in implementation of the NACS to be limited, insufficient, or entirely unavailable. Similarly, 87.5 percent of development partners also find communication efforts to be inadequate, highlighting a significant gap in public communication and stakeholder engagement.

57. Addressing this communication gap is vital to reinforcing institutional legitimacy, building trust, and mobilizing collective support for anti-corruption initiatives. A participatory communication strategy supported by adequate resources could be developed. This strategy should ensure that updates, progress data, and key findings are shared regularly through accessible digital platforms, including annual or biannual reports, interactive dashboards, and targeted outreach campaigns designed in partnerships with media outlets to amplify outreach.

58. The institutionalization and mainstreaming of anti-corruption measures remain essential to ensuring the long-term sustainability and credibility of reform efforts in Lebanon. Sustainability depends on whether results can endure over time, supported by robust institutional capacity and sustained political commitment. While some progress has been made – such as the establishment of the National Anti-Corruption) Authority capacity development action plan, which introduced elements of institutionalization including standard operating procedures, digital infrastructure, and stakeholder engagement – these efforts are not sufficiently reflected in other actions implemented within the NACS. Findings from consultations reveal that Lebanon's limited human resources and overreliance on donor funding and support continue to undermine institutional uptake and the sustainability of reforms. Without dedicated funding, specialized personnel, and cross-sectoral ownership, anti-corruption gains risk remaining episodic rather than systemic. Institutionalization must therefore be reinforced through strategic investment, integrated planning, and inclusive governance to ensure that reforms are not only initiated – but embedded, scaled, and sustained over time.

Recommendations

- Accelerate institutionalization and mainstreaming of integrity and anti-corruption measures are systematically embedded across the public administration. This requires sustained capacity building, effective inter-agency coordination, and integration into standard operating procedures. To ensure long-term impact, sustainability strategies for donor-supported initiatives need to be developed, aiming to secure institutional uptake and reinforce national ownership of reform efforts.
- Enhance strategic public communication by adopting a coordinated communication strategy to disseminate NACS objectives, milestones, and achievements. This should include media outreach, media partnerships, and developing digital platforms to improve visibility, counter misinformation, and foster public buy-in.

Annexes

Annex 1. Public administrations, civil society organisations and international partners engaged in online consultations and in-person meetings

Central Inspection
Civil Service Board
Court of Accounts
Higher Disciplinary Authority
Ministry of Justice
Ministry of Economy and Trade
Ministry of Finance
Office of the Minister of State for Administrative Reform
Public Procurement Authority
Council of State
High Judicial Council
Judicial Inspection
Public Prosecutor's Office at the Court of Cassation
Financial Public Prosecutor's Office
Presidency of the Council of Ministers
National Anti-Corruption Commission
Banque du Liban (Central Bank of Lebanon)
Special Investigation Commission at Banque du Liban
Institute Basil Fuleihan for Finance and Economics
Lebanese University
Ministry of Interior and Municipalities
Tripoli Bar Association
Beirut Bar Association
Gherbal Initiative
Transparency International – Lebanon
Democracy Reporting International

Lebanese Association for Taxpayers' Rights and Interests
Certified Anti-Corruption Experts in Lebanon
Executive Magazine
Arab NGO Network for Development
Nahnoo
Direct Act
Maharat Foundation
Publish What You Pay
Lebanese Foundation for Permanent Civil Peace
Université La Sagesse (Sagesse University)
Lebanese American University (LAU)
Lebanese Center for Policy Studies (LCPS)
Youth Against Corruption
Association of Certified Fraud Examiners – Lebanon Chapter
Governance and Citizenship Observatory at the American University of Beirut (AUB)
The Federation of Chambers of Commerce, Industry and Agriculture in Lebanon
European Union (EU)
United Nations Development Programme (UNDP)
German Agency for International Cooperation (GIZ)
Danish International Development Agency (DANIDA)
United Nations Office on Drugs and Crime (UNODC)
Expertise France (French Agency for International Technical Expertise)

Annex 2 . Summary of ministerial statements related to anti-corruption and judiciary reforms

Based on Decree No. 6156 dated January 21, 2020, His Excellency Hassan Diab was named Prime Minister.

http://www.pcm.gov.lb/arabic/subpg.aspx?pageid=20908

The Ministerial statement of the **Dr. Hassan Diab Government**:

The government reaffirms its commitment to judicial reform and strengthening the independence and effectiveness of the judiciary. This includes enacting laws related to judicial organization and independence, not limited to enhancing autonomy alone, but also ensuring a comprehensive and integrated approach that addresses transparency, integrity, and oversight mechanisms within the judiciary. It further commits to working toward the adoption of these laws and ensuring proper supervision of their implementation.

The government reaffirms its commitment to adopting and implementing the National Anti-Corruption Strategy and accelerating its execution, including the appointment of the National Anti-Corruption Commission and the provision of necessary resources to enable it to carry out its mandate. Issuing implementing decrees for the Access to Information Law and the Whistleblower Protection Law to strengthen transparency and corruption detection. Advancing the draft Illicit Enrichment Law, supported by updated evidence and data, to facilitate the recovery of unlawfully acquired assets obtained through illegal means or converted without legal justification. In cooperation with Parliament, finalizing or amending relevant legislative proposals aimed at combating corruption in both the public and private sectors, particularly through:

1. Lifting banking secrecy
2. Promoting transparency
3. Criminalizing illicit enrichment among public officials
4. Strengthening the role of oversight and audit institutions
5. Amending Article 13 of the Code of Criminal Procedure to facilitate the granting of judicial authorizations in line with accountability requirements.

http://www.pcm.gov.lb/Library/Images/Hok76Ministers/w76n.pdf

Based on Decree No. 8375 dated 10 September 2021, His Excellency Najib Mikati was appointed Prime Minister. Based on Decree No. 8376 dated 10 September 2021; His Excellency formed the government.

http://www.pcm.gov.lb/arabic/subpg.aspx?pageid=25339

The Ministerial statement of **Mr. Najib Mikati Government** "Together for Recovery" commits to "issuing enforceable provisions for the implementation and follow-up of existing anti-corruption laws, particularly those related to public procurement. It also affirms the completion of appointments to the National Anti-Corruption Commission, the activation of oversight bodies to enable them to fulfil their roles in detecting and preventing corruption, and the continuation of necessary procedures for conducting criminal financial audits of Banque du Liban accounts. Furthermore, it pledges to undertake financial audits across ministries, independent institutions, councils, and public funds, in accordance with the provisions of the law and the requirements of transparency and accountability".

http://www.pcm.gov.lb/Bayan-Wizari-Maan-lil-inkaz

Based on Decree No. 52 dated 8 February 2025, His Excellency Nawaf Salam was appointed Prime Minister. Based on Decree No. 53 dated 8 February 2025; His Excellency formed the government.

http://www.pcm.gov.lb/arabic/subpg.aspx?pageid=13587

The Ministerial statement of **Judge Nawaf Salam Government** "Reform and recovery" emphasizes the strengthening of judicial independence as a cornerstone of reform. It commits to enacting laws related to the **organization and autonomy of the judiciary**, ensuring that reforms go beyond structural changes to include transparency and integrity mechanisms, oversight and accountability within the judiciary, and protection from political interference. It commits to enacting laws related to the organization and autonomy of the judiciary.

The statement also commits to strengthening oversight institutions and reinforcing accountability mechanisms to effectively combat corruption and public sector waste.

http://www.pcm.gov.lb/Bayan-Wizari-Islah-wa-inkaz

Annex 3. Surveys for the Evaluation of the National Anti-Corruption Strategy in Lebanon (2020–2025)

1. Survey for Public Administrations

Stakeholder knowledge, strategic relevance, implementation effectiveness and efficiency

1. **How familiar is your administration with the content, objectives, and outcomes of the National Anti-Corruption Strategy (2020–2025)?** (Very familiar, Quite familiar, Moderately familiar, Slightly familiar, Not familiar)

2. **Did your administration contribute to the implementation of the National Anti-Corruption Strategy?** (Yes, No)

3. **Please specify the outcomes your administration has supported:** (Outcome 1: Specialized Anti-Corruption Legislation Completed and Implemented in Accordance with International Standards; Outcome 2: Higher Levels of Integrity in Public Function Achieved; Outcome 3: Public Procurement System Less Vulnerable to Corruption; Outcome 4: A Judicial System More Impartial and Capable of Fighting Corruption; Outcome 5: Oversight Bodies More Specialized and Effective in Fighting Corruption; Outcome 6: Society Empowered to Participate in Fostering and Promoting a Culture of Integrity; Outcome 7: Preventive Measures against Corruption Integrated at the Sectoral Level)

4. **To what extent do you have a clear understanding of the expected results of the National Anti-Corruption Strategy (2020–2025)?** (Clear understanding, Somewhat clear understanding, No clear understanding)

5. **To what extent is the National Anti-Corruption Strategy (2020–2025) aligned with national priorities, particularly with your administration's orientations and objectives?** (Highly aligned, Moderately aligned, Not aligned, Do not know/not sure)

6. **What are the main issues that the National Anti-Corruption Strategy (2020-2025) aims to address?** (Select all that apply) (Abuse of power, Bribery, Illicit enrichment, Obstruction of justice, Money laundering, Embezzlement of public funds, Abuse of influence, Conflict of interest, Other (please specify))

7. **Are the three objectives and seven outcomes of the National Anti-Corruption Strategy (2020–2025) clearly defined and sufficient to address national anti-corruption priorities and related challenges?** (Strongly agree, Agree, Neutral, Disagree, Strongly disagree)

8. **Have the Strategy's objectives related to enhancing transparency, activating accountability and ending impunity been translated into concrete actions? Please assess the following aspects using a scale from 1 (very poor) to 5 (very effective)** (Implementation of transparency mechanisms within public administration; Establishment of accountability frameworks across public institutions; Strengthening the detection and prosecution of corruption and ending impunity; Enhancing community engagement in anti-corruption efforts; Development of formal mechanisms to monitor and track progress in anti-corruption and integrity efforts; Other (please specify))

9. **Which outcomes of the Strategy have achieved the most tangible results? Please rate each outcome from 1 (least tangible results) to 5 (most tangible results):** (Outcome

1: Specialized Anti-Corruption Legislation Completed and Implemented in Accordance with International Standards; Outcome 2: Higher Levels of Integrity in Public Function Achieved; Outcome 3: Public Procurement System Less Vulnerable to Corruption; Outcome 4: A Judicial System More Impartial and Capable of Fighting Corruption; Outcome 5: Oversight Bodies More Specialized and Effective in Fighting Corruption; Outcome 6: Society Empowered to Participate in Fostering and Promoting a Culture of Integrity; Outcome 7: Preventive Measures against Corruption Integrated at the Sectoral Level)

10. **Were your administration's responsibilities in implementing the outputs of the National Anti-Corruption Strategy (2020-2025) aligned with your mandate and functions?** (Very clear, Somewhat clear, Not very clear, Not clear at all, Not applicable)

11. **To what extent were your responsibilities in implementing the outputs of the National Anti-Corruption Strategy (2020–2025) aligned with your mandate and functions?** (Fully aligned, Partially aligned, Not aligned, Not applicable)

12. **Were the financial resources allocated within your administration's budget sufficient to implement the outputs of the National Anti-Corruption Strategy? (Very sufficient, Sufficient to some extent, Not sufficient, Not sufficient at all, Not applicable)**

13. **Were the available human resources within your administration sufficient in terms of number and technical specialization to implement the outputs of the National Anti-Corruption Strategy?** (Very sufficient, Sufficient to some extent, Insufficient, Not sufficient at all, Not applicable)

14. **Did your administration assign a focal point or establish a dedicated unit to follow up on the implementation of the National Anti-Corruption Strategy?** (Yes, No)

15. **If yes, please indicate the number of staff directly involved in implementing and monitoring the outputs of the National Anti-Corruption Strategy.**

16. **Does your administration have the following capacities to support the implementation of the National Anti-Corruption Strategy?** (Legal and institutional anti-corruption framework, Corruption prevention and control measures, Risk assessment, Internal audit, Information technology and data analysis)

17. **Which capacities were lacking or insufficient within your administration, and how did these gaps affect the effective implementation of the outputs of the National Anti-Corruption Strategy?**

18. **In your opinion, what were the main factors that contributed to the successful implementation of the outputs of the National Anti-Corruption Strategy (2020–2025)? (Select up to three)** (Strong political will and leadership commitment, Existence of an adequate legal and regulatory framework, Adequate allocation of financial and human resources, Implementation capacity of responsible public entities, Cooperation and dialogue among stakeholders, Other (please specify))

19. **What are the main challenges and obstacles that have hindered the effective implementation of the outputs of the National Anti-Corruption Strategy (2020–2025)?** (Select all that apply) (Lack of clarity in the strategy's implementation framework, Weak coordination among relevant public administrations, Gaps in anti-corruption legis**lation**

and integrity standards, Insufficient financial resources, Shortage of qualified human resources, Limited technical capacities within existing human resources, Lack of coordination among relevant units, Other challenges (please specify))

20. **Are there any lessons learned – positive or negative – that your administration would like to share?**

Institutional coordination and participation

21. **Did your administration participate in any of the following committees or working groups?** (Ministerial Anti-Corruption Committee, Technical Anti-Corruption Committee, National Task Team to support the establishment of the National Anti-Corruption Commission, National Task Team on the compliance of Lebanese Laws with International Standards, National Task Team to support the implementation of the Whistleblower Protection Law, National task Team to support the implementation of the Access to Information law, None).
22. **How would you evaluate the level of coordination and cooperation among the public administration entities involved in implementing the National Anti-Corruption Strategy in Lebanon (2020–2025)?** (Very effective – Coordination is well-structured and positively impacts implementation; Good – There is noticeable cooperation, despite some challenges; Limited – Coordination exists in some areas but requires further development; Ineffective – Weak cooperation or absence of clear coordination mechanisms; Do not know/cannot assess at this time)
23. **How would your administration assess its coordination with other administrations involved in implementing the National Anti-Corruption Strategy (2020-2025)?** (Very effective – Coordination is well-structured and positively impacts implementation; Good – There is noticeable cooperation, despite some challenges; Limited – Coordination exists in some areas but requires further development; Ineffective – Weak cooperation or absence of clear coordination mechanisms; Do not know/cannot assess at this time)
24. **How effective is the national mechanism for monitoring the implementation of the Strategy, including the Ministerial Anti-Corruption Committee and the Technical Anti-Corruption Committee?** (Very effective – Clearly achieves its objectives and positively impacts implementation; Moderately effective – Plays a positive role but faces some coordination or follow-up challenges; Limited effectiveness – Contributes partially but requires structural or functional improvements; Ineffective – Does not play a clear role or negatively affects implementation; Do not know/cannot assess at this time)
25. **How would you assess the coordination efforts provided by the Office of the Minister of State for Administrative Reform in its capacity as Chair of the Technical Committee Anti-Corruption Committee?** (Excellent, Good, Acceptable, Weak)
26. **How would you assess the monitoring and evaluation support provided by the Office of the Minister of State for Administrative Reform in its capacity as Chair of the Technical Committee Anti-Corruption Committee?** (Excellent, Good, Acceptable, Weak)
27. **What measures can be taken to strengthen coordination in implementing the National Anti-Corruption Strategy (2020–2025)?**

28. **What measures can be taken to strengthen monitoring and evaluation in implementing the National Anti-Corruption Strategy (2020–2025)?**

29. **How would you assess the effectiveness of participation of non-governmental actors in implementing the National Anti-Corruption Strategy (2020–2025)?** (Excellent – Active and impactful participation that supports implementation; Good – Positive contribution, though improvements are needed; Acceptable – Limited or inconsistent participation; Weak – Minimal or unclear contribution; Do not know/cannot assess at this time)

30. **What measures can be taken to enhance the participation of non-governmental actors in implementing the National Anti-Corruption Strategy?**

Impact and communication

31. **31. Has your administration observed any of the following changes resulting from the implementation of the National Anti-Corruption Strategy (2020–2025)?** (Select all that apply)

    At the institutional level: (Changes in policies or procedures to strengthen corruption prevention and integrity, Changes in internal policies or procedures to enhance transparency, Changes in policies or procedures to activate accountability, Measures introduced to reduce impunity, Increased awareness of corruption risks within public administrations, Greater participation in corruption prevention initiatives within public administrations, Improved coordination and cooperation among public administrations, Improved coordination and cooperation among oversight bodies, Improved coordination and cooperation among judicial entities, Other (please specify))

32. **Has your administration observed any of the following changes resulting from the implementation of the National Anti-Corruption Strategy (2020–2025)? (Select all that apply)**

    At the individual level: (Changes in behavior among public administration employees, Changes in citizen behavior when interacting with public administrations, Increased reporting of corruption by public administration employees, Increased reporting of corruption by citizens, Other (please specify))

33. **How would you assess the effectiveness of communication regarding progress in implementing the National Anti-Corruption Strategy (2020–2025), including achievements and challenges?** (Very effective and comprehensive, Moderately effective but requires improvement, Limited and insufficient, Non-existent, Do not know/insufficient information)

34. **What measures can be taken to improve communication and enhance awareness of efforts made in implementing the National Anti-Corruption Strategy (2020–2025)?** (Select all that apply) (Develop a participatory communication strategy with adequate support for implementation, Provide information and data regularly through digital platforms, Ensure clarity of messages and content in reports, Use modern communication tools and channels, Collaborate with media outlets, Engage civil society organizations, Other (please specify))

Strategic priorities and future support for prevention and combating corruption

35. **If the current Strategy is updated, what should be its main strategic priorities?** (Please select up to three options) (Increase transparency and simplify administrative procedures to ensure access to effective public services, Establish integrity standards in public sector recruitment, Strengthen integrity in public procurement to ensure transparency and reduce conflicts of interest and corruption, Build partnerships with the private sector to enhance its role in corruption prevention and reporting, Safeguard judicial independence and strengthen accountability systems, Adopt clear transparency policies in judicial institutions including publication of decisions and statistics, Empower internal control units and activate risk management systems, Strengthen coordination among oversight and judicial bodies, Develop preventive approaches based on risk analysis in vulnerable sectors and at the municipal level, Other (please specify))

36. **If the current Strategy is updated, how can implementation, monitoring, and evaluation mechanisms be improved?**

37. **Do you have any additional comments or suggestions you would like to share at the end of this survey?**

2. Survey for Civil Society Organizations

Stakeholder knowledge, strategic relevance, implementation effectiveness and efficiency

1. **How familiar is your organization with the content, objectives, and outcomes of the National Anti-Corruption Strategy (2020–2025)?** (Very familiar, Quite familiar, Moderately familiar, Slightly familiar, Not familiar)

2. **Did your organization contribute to the implementation of the National Anti-Corruption Strategy?** (Yes, No)

3. **Please specify the outcomes your administration has supported:** (Outcome 1: Specialized Anti-Corruption Legislation Completed and Implemented in Accordance with International Standards; Outcome 2: Higher Levels of Integrity in Public Function Achieved; Outcome 3: Public Procurement System Less Vulnerable to Corruption; Outcome 4: A Judicial System More Impartial and Capable of Fighting Corruption; Outcome 5: Oversight Bodies More Specialized and Effective in Fighting Corruption; Outcome 6: Society Empowered to Participate in Fostering and Promoting a Culture of Integrity; Outcome 7: Preventive Measures against Corruption Integrated at the Sectoral Level)

4. **To what extent do you have a clear understanding of the expected results of the National Anti-Corruption Strategy (2020–2025)?** (Clear understanding, Somewhat clear understanding, No clear understanding)

5. **To what extent are the three objectives of the National Anti-Corruption Strategy (2020–2025) aligned with national priorities and sectoral policies?** (Highly aligned, Moderately aligned, Not aligned, Do not know/not sure)

6. **Which sectors should have been prioritized in the National Anti-Corruption Strategy (2020–2025)? (Select up to three)** (Justice, Civil service, Public finance, Health, Education, Energy, Water, Municipalities, Private sector, Other sectors (please specify))

7. **What are the main issues that the National Anti-Corruption Strategy (2020-2025) aims to address? (Select all that apply)** (Abuse of power, Bribery, Illicit enrichment, Obstruction of justice, Money laundering, Embezzlement of public funds, Abuse of influence, Conflict of interest, Other (please specify))
8. **Are the three objectives and seven outcomes of the National Anti-Corruption Strategy (2020–2025) clearly defined and sufficient to address national anti-corruption priorities and related challenges?** (Strongly agree, Agree, Neutral, Disagree, Strongly disagree)
9. **Were the 34 outputs of the National Anti-Corruption Strategy (2020–2025) designed and structured in a way that enables the achievement of the seven expected outcomes?** (Strongly agree, Agree, Neutral, Disagree, Strongly disagree)
10. **Have the Strategy's objectives related to enhancing transparency, activating accountability and ending impunity been translated into concrete actions? Please assess the following aspects using a scale from 1 (very poor) to 5 (very effective)** (Implementation of transparency mechanisms within public administration; Establishment of accountability frameworks across public institutions; Strengthening the detection and prosecution of corruption and ending impunity; Enhancing community engagement in anti-corruption efforts; Development of formal mechanisms to monitor and track progress in anti-corruption and integrity efforts; Other (please specify))
11. **Which outcomes of the Strategy have achieved the most tangible results? Please rate each outcome from 1 (least tangible results) to 5 (most tangible results):** (Outcome 1: Specialized Anti-Corruption Legislation Completed and Implemented in Accordance with International Standards; Outcome 2: Higher Levels of Integrity in Public Function Achieved; Outcome 3: Public Procurement System Less Vulnerable to Corruption; Outcome 4: A Judicial System More Impartial and Capable of Fighting Corruption; Outcome 5: Oversight Bodies More Specialized and Effective in Fighting Corruption; Outcome 6: Society Empowered to Participate in Fostering and Promoting a Culture of Integrity; Outcome 7: Preventive Measures against Corruption Integrated at the Sectoral Level)
12. **Were you effectively engaged by public administrations in the design of initiatives under the National Anti-Corruption Strategy (2020–2025)?** (Strongly agree – We were actively engaged in the design phases; Agree – We were engaged to a reasonable extent; Neutral – Unable to assess the level of engagement; Disagree – Engagement was limited and insufficient; Strongly disagree – No engagement took place; Not applicable – Our organization is not concerned)
13. **If your organization participated in the design of initiatives under the National Anti-Corruption Strategy (2020–2025), what was the nature of this participation?** (Consultative or coordination meetings – e.g., meetings with public entities, ministerial working groups, or technical committees; Planning or analytical workshops – e.g., contributing to defining objectives, setting performance indicators, or problem analysis; Written or technical contributions – e.g., preparing reports, submitting written inputs, conducting ex-ante or ex-post assessments; Community engagement and outreach efforts – e.g., organizing community dialogues or stakeholder meetings; Other (please specify))

14. **How would you assess the effectiveness of the initiatives you participated in that contributed to the implementation of the National Anti-Corruption Strategy (2020–2025)?** (Public awareness initiatives (e.g., media campaigns, dissemination of educational materials); Reporting mechanisms or development of complaint systems; Provision of technical or institutional support; Monitoring or evaluation of initiatives; Other (please specify))

15. **Were your organization's roles and responsibilities in implementing the outputs and initiatives of the National Anti-Corruption Strategy (2020–2025) clearly defined?** (Very clear, Somewhat clear, Not very clear, Not clear at all)

16. **Did your organization participate in capacity-building initiatives related to the implementation of the National Anti-Corruption Strategy (2020–2025), provided by public administrations, donors, or international/regional organizations?** (Yes, No)

17. **If yes, please specify the type of initiative and the extent to which your organization benefited:** (Specialized training programmes; Analytical or applied workshops; Conferences and awareness-raising events; Other (please specify and indicate level of benefit))

18. **Did these initiatives contribute to strengthening your organization's role in anti-corruption efforts?** (Strongly agree, Agree, Neutral, Disagree, Strongly disagree)

19. **In your view, were the public financial resources allocated through the national budget sufficient to support the effective implementation of the outputs of the National Anti-Corruption Strategy?** (Very sufficient, Sufficient to some extent, Not sufficient, Not sufficient at all)

20. **In your view, were the available human resources within public administrations sufficient in terms of number and technical specialization to implement the outputs of the National Anti-Corruption Strategy? (**Very sufficient, Sufficient to some extent, Not sufficient, Not sufficient at all)

21. **Which capacities were lacking or insufficient within public administrations, and how did these gaps affect the effective implementation of the outputs of the National Anti-Corruption Strategy?**

22. **In your opinion, what were the main factors that contributed to the successful implementation of the outputs of the National Anti-Corruption Strategy (2020–2025)?** (Select up to three) (Strong political will and leadership commitment; Existence of an adequate legal and regulatory framework; Adequate allocation of financial and human resources; Implementation capacity of responsible public entities; Cooperation and dialogue among stakeholders; Other (please specify))

23. **What are the main challenges and obstacles that have hindered the effective implementation of the outputs and initiatives of the National Anti-Corruption Strategy (2020–2025)? (Select all that apply)** (Lack of clarity in the strategy's implementation framework; Weak coordination among relevant public administrations; Gaps in anti-corruption legislation and integrity standards; Insufficient financial resources; Shortage of qualified human resources; Limited technical capacities within existing human resources; Lack of coordination among relevant units; Other challenges (please specify))

24. **What challenges has your organization faced in relation to the implementation of the National Anti-Corruption Strategy (2020–2025), and are there any lessons learned you would like to share?**

Institutional coordination and participation

25. **How would you assess coordination and cooperation with public administrations involved in implementing the National Anti-Corruption Strategy in Lebanon (2020–2025)?** (Very effective – Coordination is well-structured and positively impacts implementation; Good – There is noticeable cooperation, despite some challenges; Limited – Coordination exists in some areas but requires further development; Ineffective – Weak cooperation or absence of clear coordination mechanisms; Do not know/cannot assess at this time)

26. **What challenges does your organization face in coordinating with public administrations?**

27. **How would you evaluate the level of coordination and cooperation among public administrations involved in implementing the National Anti-Corruption Strategy (2020–2025)?** (Very effective – Coordination is well-structured and positively impacts implementation; Good – There is noticeable cooperation, despite some challenges; Limited – Coordination exists in some areas but requires further development; Ineffective – Weak cooperation or absence of clear coordination mechanisms; Do not know/cannot assess at this time)

28. **What measures can be taken to strengthen coordination in implementing the National Anti-Corruption Strategy (2020–2025)?**

29. **How would you assess the effectiveness of participation of non-governmental actors in implementing the National Anti-Corruption Strategy (2020–2025)?** (Excellent – Active and impactful participation that supports implementation; Good – Positive contribution, though improvements are needed; Acceptable – Limited or inconsistent participation; Weak – Minimal or unclear contribution; Do not know/cannot assess at this time)

30. **What measures can be taken to enhance the participation of non-governmental actors in implementing the National Anti-Corruption Strategy?**

Impact and communication

31. **Has your organization observed any of the following changes resulting from the implementation of the National Anti-Corruption Strategy (2020–2025)?** (Select all that apply)

    At the institutional level: (Changes in policies or procedures to strengthen corruption prevention and integrity, Changes in internal policies or procedures to enhance transparency, Changes in policies or procedures to activate accountability, Measures introduced to reduce impunity, Increased awareness of corruption risks within public administrations, Greater participation in corruption prevention initiatives within public administrations, Improved coordination and cooperation among public administrations, Improved coordination and cooperation among oversight bodies, Improved coordination and cooperation among judicial entities, Other (please specify))

32. **Has your organization observed any of the following changes resulting from the implementation of the National Anti-Corruption Strategy (2020–2025)? (Select all that apply)**

    At the individual level: (Changes in behavior among public administration employees, Changes in citizen behavior when interacting with public administrations, Increased reporting of corruption by public administration employees, Increased reporting of corruption by citizens, Other (please specify))

33. **How would you assess the effectiveness of communication regarding progress in implementing the National Anti-Corruption Strategy (2020–2025), including achievements and challenges?** (Very effective and comprehensive, Moderately effective but requires improvement, Limited and insufficient, Non-existent, Do not know/insufficient information)

34. **What measures can be taken to improve communication and enhance awareness of efforts made in implementing the National Anti-Corruption Strategy (2020–2025)? (Select all that apply)** (Develop a participatory communication strategy with adequate support for implementation, Provide information and data regularly through digital platforms, Ensure clarity of messages and content in reports, Use modern communication tools and channels, Collaborate with media outlets, Engage civil society organizations, Other (please specify))

Strategic priorities and future support for prevention and combating corruption

35. **If the current Strategy is updated, what should be its main strategic priorities? (Please select up to three options)** (Increase transparency and simplify administrative procedures to ensure access to effective public services, Establish integrity standards in public sector recruitment, Strengthen integrity in public procurement to ensure transparency and reduce conflicts of interest and corruption, Build partnerships with the private sector to enhance its role in corruption prevention and reporting, Safeguard judicial independence and strengthen accountability systems, Adopt clear transparency policies in judicial institutions including publication of decisions and statistics, Empower internal control units and activate risk management systems, Strengthen coordination among oversight and judicial bodies, Develop preventive approaches based on risk analysis in vulnerable sectors and at the municipal level, Other (please specify))

36. **If the current Strategy is updated, how can implementation, monitoring, and evaluation mechanisms be improved?**

37. **Do you have any additional comments or suggestions you would like to share at the end of this survey?**

3. Survey for International Development Partners

Stakeholder knowledge, strategic relevance, implementation effectiveness and efficiency

1. **How familiar is your organization with the content, objectives, and outcomes of the National Anti-Corruption Strategy (2020–2025)?** (Very familiar, Quite familiar, Moderately familiar, Slightly familiar, Not familiar)

2. **Did your organization contribute to the implementation of the National Anti-Corruption Strategy?** (Yes, No) If yes, please specify the outcomes your administration has supported: (Outcome 1: Specialized Anti-Corruption Legislation Completed and Implemented in Accordance with International Standards; Outcome 2: Higher Levels of Integrity in Public Function Achieved; Outcome 3: Public Procurement System Less Vulnerable to Corruption; Outcome 4: A Judicial System More Impartial and Capable of Fighting Corruption; Outcome 5: Oversight Bodies More Specialized and Effective in Fighting Corruption; Outcome 6: Society Empowered to Participate in Fostering and Promoting a Culture of Integrity; Outcome 7: Preventive Measures against Corruption Integrated at the Sectoral Level)

   Please describe the specific outputs you have supported within the Strategy:

3. **Please specify the types of support your organization has provided (Select all that apply):** (Funding – Financial contributions to support implementation activities; Capacity building – Training, workshops, and institutional strengthening; Technical assistance and policy advice – Expert input on reforms, systems, and legal frameworks; Advocacy and public engagement – Campaigns, awareness-raising, and stakeholder mobilization; Research and analysis – Studies, assessments, and data collection to inform the implementation of the strategy; Monitoring and evaluation support – Tools, methodologies, or participation in performance tracking; Digital tools and infrastructure – Support for e-governance, transparency portals, or reporting systems; Convening and dialogue facilitation – Hosting multi-stakeholder forums or consultations; Other forms of support (please specify))

4. **To what extent do you have a clear understanding of the expected results of the National Anti-Corruption Strategy (2020–2025)?** (Clear understanding, Somewhat clear understanding, No clear understanding)

5. **To what extent do you believe the National Anti-Corruption Strategy (2020–2025) was relevant and responsive to the specific corruption risks and governance challenges faced by high-risk sectors in Lebanon?** (Highly relevant – The strategy clearly addressed sector-specific vulnerabilities and proposed targeted interventions; Moderately relevant – Some sectoral risks were considered, but gaps remain in coverage or depth; Minimally relevant – Sector-specific challenges were only partially addressed or overlooked; Not relevant – The strategy lacked focus on high-risk sectors and did not respond to their unique challenges; Do not know/cannot assess)

6. **Are the seven outcomes of the National Anti-Corruption Strategy (2020–2025) clearly defined and address appropriately Lebanon's anti-corruption priorities and challenges?** (Strongly agree; Agree; Neutral; Disagree; Strongly disagree)

7. **How relevant were the 34 outputs outlined in the National Anti-Corruption Strategy**

(2020–2025) to achieving the seven expected outcomes? (Highly relevant; Relevant; Neutral; Not relevant)

8. **Have the Strategy's objectives related to enhancing transparency, activating accountability and ending impunity been translated into concrete actions? Please assess the following aspects using a scale from 1 (very poor) to 5 (very effective)** (Implementation of transparency mechanisms within public administration; Establishment of accountability frameworks across public institutions; Strengthening of systems for detecting and prosecuting corruption, with a focus on ending impunity; Increased community engagement in anti-corruption initiatives; Promotion of a culture of integrity across all sectors of society; Development of formal tools and mechanisms to monitor and evaluate progress in anti-corruption and integrity-building efforts; Other (please specify))
9. **In your opinion, which outcomes of the strategy have yielded the most tangible results? Please rate each outcome on a scale from 1 (least tangible results) to 5 (most tangible results):** (Outcome 1: Specialized Anti-Corruption Legislation Completed and Implemented in Accordance with International Standards; Outcome 2: Higher Levels of Integrity in Public Function Achieved; Outcome 3: Public Procurement System Less Vulnerable to Corruption; Outcome 4: A Judicial System More Impartial and Capable of Fighting Corruption; Outcome 5: Oversight Bodies More Specialized and Effective in Fighting Corruption; Outcome 6: Society Empowered to Participate in Fostering and Promoting a culture of Integrity; Outcome 7: Preventive Measures against Corruption Integrated at the Sectoral Level)
10. **In your view, are the public financial resources allocated through the national budget sufficient to support the effective implementation of the outputs outlined in the National Anti-Corruption Strategy (2020-2025)?** (Fully sufficient; Sufficient to some extent; Not at all sufficient)
11. **In your view, were the available human resources in the public administration sufficient in terms of number and technical specialization to implement the outputs of the National Anti-Corruption Strategy (2020-2025)?** (Very sufficient; Sufficient to some extent; Insufficient; Completely insufficient)
12. **In your assessment, which specific technical capacities were insufficient or missing within the public administration, and how did these gaps hinder the effective implementation of the outputs of the National Anti-Corruption Strategy (2020–2025)?**
13. **In your opinion, what were the enabling factors that effectively supported the implementation of the National Anti-Corruption Strategy (2020–2025)? Please select all that apply:** (Strong political will and leadership commitment; Willingness to foster partnerships with non-governmental actors; Existence of robust and capable institutions; Adequate allocation of financial and human resources; Other (please specify))
14. **In your opinion, what challenges have hindered the effective implementation of the National Anti-Corruption Strategy (2020–2025)?** Please select all that apply: (Lack of clarity in the strategy's implementation framework; Weak coordination among relevant public administrations; Gaps in anti-corruption legislation and integrity standards; Insufficient financial resources; Shortage of qualified human resources; Limited technical capacities within existing human resources; Other (please specify))

Institutional coordination and participation of non-governmental actors

15. **How would you evaluate the level of coordination and cooperation among the public administration entities involved in implementing the National Anti-Corruption Strategy in Lebanon (2020–2025)?** (Very effective – Coordination mechanisms are well-established, inter-agency collaboration is strong, and implementation efforts are synergistic; Good – Cooperation is evident and contributes to implementation, though some gaps or inefficiencies remain; Limited – Coordination exists but is fragmented or inconsistent across institutions; Ineffective – There is minimal or no coordination, with unclear roles and weak collaboration)

16. **What specific measures or institutional mechanisms do you recommend to strengthen coordination and collaboration amongst the public administration entities involved in the implementation of the National Anti-Corruption Strategy (2020–2025)?**

17. **How would you assess the effectiveness of participation of non-governmental actors (e.g., civil society organizations, academia, media, private sector) in the implementation of the National Anti-Corruption Strategy (2020–2025)?** (Excellent – Participation is active, strategic, and has significantly contributed to the achievement of key outputs; Good – Engagement is generally positive and constructive, though there are areas for improvement; Acceptable – Participation is present but sporadic or limited in scope and influence; Poor – Engagement is weak, unclear, or largely absent; Do not know/cannot assess at this time)

    Optional: Please share any relevant good practices, successful collaborations, or innovative approaches involving non-governmental actors.

Impact and communication

18. **Has your organization observed any direct or indirect changes resulting from the implementation of the National Anti-Corruption Strategy in Lebanon (2020–2025)?** (Select all that apply)

    Institutional-level changes: (Reforms in policies or procedures to strengthen corruption prevention and integrity; Enhanced internal transparency mechanisms (e.g., disclosure practices, open data); Activation of accountability frameworks (e.g., performance audits, disciplinary systems); Measures introduced to reduce impunity (e.g., enforcement of sanctions, legal reforms); Increased awareness of corruption risks within public administration; Expanded participation of public institutions in anti-corruption initiatives; Improved coordination and cooperation among the public administration; Strengthened collaboration among oversight bodies (e.g., audit institutions, anti-corruption commissions); Enhanced coordination among judicial entities; Other (please specify))

    Individual-level changes: (Behavioral changes among public administration employees (e.g., ethical conduct, reporting); Changes in citizen behavior when interacting with public institutions (e.g., demand for transparency); Increase in citizen whistleblowing/reporting of misconduct and corruption; Other (please specify))

19. **How would you assess the effectiveness of communication regarding progress in implementing the National Anti-Corruption Strategy (2020–2025), including achievements, challenges, and lessons learned?** (Very effective – Communication is compre-

hensive, timely, and accessible across all relevant platforms; Moderately effective – Key information is shared, but there are gaps in consistency, reach, or clarity; Limited – Communication is sporadic, lacks depth, or fails to reach key stakeholders; Non-existent – No visible communication efforts have been observed; Do not know/insufficient information to assess)

20. **What measures do you recommend to improve communication and increase public awareness of efforts made in implementing the National Anti-Corruption Strategy (2020–2025)? (Select all that apply)** (Develop a participatory communication strategy with adequate resources for implementation; Share updates and data regularly through digital platforms (e.g., annual or biannual reports); Ensure clarity, accessibility, and relevance of messages in official reports and briefings; Utilize modern communication tools (e.g., social media, infographics, interactive dashboards); Strengthen partnerships with media outlets to amplify outreach; Engage civil society organizations in co-designing and disseminating communication; Other (please specify))

Strategic priorities and future support for prevention and combating corruption

21. **If a new National Anti-Corruption Strategy is developed, what should be its strategic priorities? (Please select up to three options that you consider most critical)** (Increase transparency and streamline administrative procedures to improve citizens' access to quality public services; Establish and enforce integrity standards in public sector recruitment and employment; Strengthen integrity in public procurement to promote transparency and prevent conflicts of interest and corruption; Foster partnerships with the private sector to enhance its role in corruption prevention and reporting; Safeguard judicial independence and reinforce accountability mechanisms to uphold the integrity of judicial decisions; Implement clear transparency policies in judicial operations, including the publication of rulings and performance statistics; Empower internal control units and introduce risk management systems to improve self-monitoring within public institutions; Promote integration and coordination among oversight and judicial bodies for a more effective and unified justice system; Develop preventive strategies based on risk assessments in vulnerable sectors and at the municipal level; Other (please specify))

22. **Looking ahead, what key priorities do you foresee supporting to strengthen anti-corruption efforts and integrity systems?**

23. **Do you have any final comments or suggestions?**

Annex 4. Criteria and key questions for evaluating the NACS

Criteria	Key Objectives	Key Questions to be Addressed
Relevance	• Assess whether the NACS outcomes were clearly defined, achievable, and logically linked to outputs and activities. • Examine the relevance of goals and measures in light of Lebanon's corruption landscape (2020–2025) and the Strategy's theory of change. • Review how strategic objectives, outcomes, and indicators targeted high-risk sectors and enabled localized anti-corruption action. • Evaluate the NACS responsiveness to emerging national priorities and evolving contexts.	• To what extent is the NACS and its strategic objectives designed to respond to the national priorities and corruption challenges during the period 2020-2025? • To what extent is the NACS aligned with Lebanon's international and regional commitments? • To what extent did the NACS adapt to an evolving national, regional and international context?
Coherence	• Assess the horizontal and vertical coherence of the NACS with national policies and anti-corruption initiatives. • Examine alignment between NACS and Lebanon's legal and institutional frameworks for preventing and combating corruption. • Identify complementarities and synergies with related strategies—including governance reforms, money laundering prevention, and asset recovery mechanisms.	• To what extent is the anti-corruption legal and institutional frameworks coherent with the NACS? • Is the NACS coherent with national governance policies?
Effectiveness	• Assess the extent of implementation of NACS at the macro level (strategic objectives and outcomes). • Identify and analyse key results achieved through the strategy's execution. • Highlight strengths, weaknesses and gaps in implementation.	• To what degree was the NACS expected results achieved? • What were the major factors influencing the achievement or non-achievement of the objectives? • To what extent is the governance mechanism that has been established for the implementation and monitoring of the NACS effective?

Criteria	Key Objectives	Key Questions to be Addressed
Efficiency	• Assess whether financial, human, and material resources dedicated to NACS were used efficiently. • Examine how resource allocation contributed to achieving the strategy's intended results. Note: This evaluation does not include a full cost-benefit analysis or financial audit.	To what extent were the resources (human, material and financial) used efficiently to achieve the expected outcomes of the NACS?
Impact	• Assess the influence of NACS implementation on the state of corruption in Lebanon. • Highlight observable changes, if available, using international and national indicators. • Note: A full impact assessment is not feasible within the current timeframe (less than 5 years); focus remains on early signs of institutional and behavioural or perception changes.	• What changes (regulatory, institutional and behavioural), did the Strategy bring? • To what extent has the NIACS been successful in reducing corruption and has it contribute to strengthening good governance?
Sustainability	• Analyse whether NACS results can be sustained over time. • Review the strength of behavioural, legal, and institutional frameworks supporting long-term impact. • Assess the level of stakeholder ownership and commitment to preserving and advancing anti-corruption outcomes.	• What are the factors that will allow the sustainability of the results obtained? • To what extend are stakeholders empowered and committed to anti-corruption initiatives?

Republic of Lebanon

Anti Corruption
National Strategy